

SUDBURY
INTEGRATED NICKEL
OPERATIONS
A GLENCORE COMPANY

Tailings Policy

Sudbury Integrated Nickel Operations (Sudbury INO) operates nickel-copper mines, a concentrator and a smelter in the Sudbury area. Nickel and copper concentrates are shipped from the concentrator to smelters in Ontario and Quebec for processing and metal extraction. We operate and maintain wastewater treatment systems and tailings impoundment areas with associated control structures.

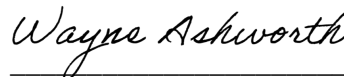
Sudbury Integrated Nickel Operations are **committed** to the protection of public health and safety as well as the natural environment for present and future generations. In accordance with globally accepted best practices, including the Global Industry Standard on Tailings Management (ICMM 2020) and Glencore's *Protocol 14 – Tailings Storage Facility and Dam Management* (2019), we will meet this commitment through the implementation of policies and practices by providing the resources to:

- **Locate, design, construct, operate, decommission and close** tailings facilities in a manner such that structures are stable, wastewater and tailings are managed within designated locations, and all aspects of tailings management are in compliance with Sudbury INO's **Sustainability Policy**, legislative requirements and conform to sound engineering practice, the MAC TSM Guiding Principles, the MAC Tailings Management Framework and commitment to stakeholders
- **Responsibly manage** wastewater and tailings management systems in conformity with the **Operations, Maintenance and Surveillance Manual**, with the objective of minimizing harm
- **Allocate appropriate resources** to support all levels of tailings management activities
- **Establish** an ongoing program of **review and continual improvement** to manage health, safety and environmental risks associated with the wastewater and tailings management system
- Take **responsibility** for implementing this framework through the commitments and actions of its employees
- **Conduct an annual senior management** review of the performance of the wastewater and tailings management system
- **Consult with Communities of Interest** on the performance of the wastewater and tailings management system, taking into account their considerations relating to the tailings facility management

This policy applies to employees, contractors, service providers and persons working on behalf of the Sudbury Integrated Nickel Operations



Peter Xavier
Vice President,
Sudbury Integrated Nickel Operations



Wayne Ashworth
Head of Nickel Assets
Glencore Nickel

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