

SUDBURY
INTEGRATED NICKEL
OPERATIONS
A GLENCORE COMPANY

HSEC & Human Rights Sustainability Policy

Sudbury Integrated Nickel Operations is committed to ensuring the long term viability and continued success of our business as well as supporting the sustainability of our local communities.

We aim to operate safe workplaces that are injury free, and to enhance the well-being of employees, contractors and communities.

We maintain a safe workplace that is based on mutual respect, fairness and integrity.

We aim to preserve the long-term health, function, and viability of the natural environments affected by our operations through investments in our businesses to improve their performance, and to ensure the efficient use of resources such as water and energy.

We recognize our responsibility to identify, assess and manage the impacts, risks, benefits and opportunities of our products throughout their life-cycle

We contribute to the social and economic development of sustainable communities associated with our operations through investment in skills, education, health, social and enterprise development that will lead to economic benefits and sustainable livelihoods in any particular region.

We aspire to the highest standards of business conduct, set out in our Glencore Code of Conduct, to protect and enhance our corporate reputation and ensure ongoing access to mineral resources.

We work to develop and maintain relationships with our stakeholders to minimize risk to them, our operation, and secure an ongoing license to operate. We aim to create mutual benefits for stakeholders, working in partnership with the various parties who have an interest in, or are affected by our business.

These goals will be achieved with reference to the following:

- Glencore - Our Values, Code of Conduct, HSEC and Human Rights policies and Standards, Anti-Corruption Policy, Risk Management Framework
- Sudbury Integrated Nickel Operations - Tailings Policy
- Sudbury Integrated Nickel Operations - Environmental Policy
- Sudbury Integrated Nickel Operations - Health and Safety Policy
- Sudbury Integrated Nickel Operations - Community Policy
- Sudbury Integrated Nickel Operations - Occupational Hygiene Policy
- Sudbury Integrated Nickel Operations - Workplace Harassment and Violence Policy

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Peter Xavier

Vice President,

Sudbury Integrated Nickel Operations,

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