

SUDBURY
INTEGRATED NICKEL
 OPERATIONS
 A GLENCORE COMPANY

Health & Safety Policy

Our top priority is the health and safety of our workforce, host communities, contractors and others who may be impacted by our operations. We must identify, manage, mitigate or eliminate health and safety risks in our business.

This Health and Safety Policy articulates the fundamental elements of Glencore's approach to health and safety management wherever we operate. It outlines our ongoing commitments to our workforce, their families, local communities and wider society.

This policy applies to all employees and contractors.

All individuals that enter our sites have an obligation to work in a safe and healthy manner and to look out for one another. Our workforce must report any unsafe acts or conditions to management who will follow up and rectify.

Our Code of Conduct and Values guide our behaviours in everything we do. Safety is our first value and our top priority. We never compromise on safety.

Our health and safety ambition is zero fatalities, serious injuries and occupational illnesses. We believe our people have the right to go home safe and healthy to their families and their communities at the end of the day. We are committed to identifying and adopting measures to help us achieve this goal and we openly engage with industry peers and other key stakeholders to improve and share best practices.

We expect our leaders to demonstrate a visible commitment to health and safety and to be committed to having a competent workforce that is equipped with the right tools and level of awareness to manage the hazards and risks within their work environment.

The implementation of comprehensive health and safety management systems, our SafeWork programme, and where appropriate process safety is central to protecting people's health and safety. We continually improve our systems so they remain current and reflect leading practice.

We implement risk management processes, through which we systematically identify, assess, and manage health and safety hazards and credible risk scenarios associated with our operation. We are committed to providing adequate Health, Safety, Environment and Community (HSEC) emergency and crisis management capability across our organization.

We assess the hazards of our products in accordance with UN Globally Harmonised System of Hazard Classification and Labelling or equivalent relevant regulatory systems, and encourage safe and responsible transport handling and use.

We promote, educate and support our workforce in making healthy lifestyle choices and recognising the importance of good mental health. We expect everyone entering our site to be fit for work, free of fatigue and not under the influence of alcohol or drugs that may impair their ability to work safely.

We work with employees who have been injured and when safe to do so, encourage them to return to work.

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We implement health surveillance systems to support the early detection of adverse health impacts in our workforce and monitor the potential health and safety impacts of our operations on communities with the aim of minimising adverse impacts on them. We achieve this through collaboration with our local communities and agencies to identify and implement initiatives that improve health in those communities.

We systematically assess leading and lagging health and safety indicators to track the integrity and performance of controls. We also build our people's capability to undertake high quality investigations to identify direct causes and contributing factors of incidents, implement corrective actions and share the learnings to prevent repeat incidents. We implement assurance processes through which we test suitability, design and implementation effectiveness of our controls and alignment with the International Council on Mining and Metals (ICMM) Performance Expectations.

DocuSigned by:



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Peter Xavier
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A Glencore Company

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