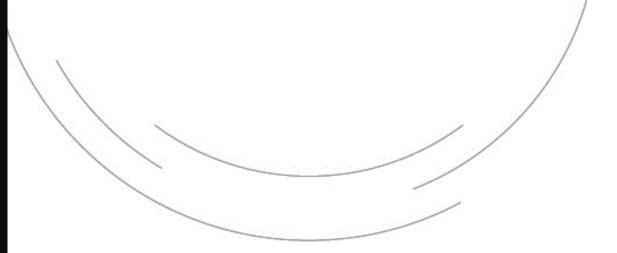
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POLICY



Health and Safety Policy

All Operations Policy



SUDBURY INTEGRATED NICKEL OPERATIONS ^ GLENCORE COMPANY

Health and Safety Policy

Introduction

Our top priority is the health and safety of our workforce, host communities, contractors and others who may be impacted by our operations. Health and safety of our workforce, host communities, contractors and others who may be impacted by our operations is our top priority.

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 commitment to our workforce, their families, local communities, and wider society.

Who does this apply to?

This policy applies to all employees, and contractors under Glencore's direct supervision, working for a Glencore office or industrial asset directly or indirectly controlled or operated by Glencore. All individuals that enter our sites have an obligation to work in a safe and healthy manner and to look out for one another. This also includes reporting any unsafe acts or conditions to management who will follow up and rectify.

Our Commitment

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. We believe our people have a right to go home safe and healthy to their families and their communities, every day. Our health and safety ambition is zero fatalities, serious injuries and occupational illnesses. 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 visible leadership and commitment in protecting health and safety of our people. We achieve this with implementing Glencore's SafeWork program, comprehensive health and Safety management systems, and where appropriate process safety. We implement risk management processes to systematically identify, assess, and manage health and safety hazards and credible risk scenarios associated with our operations. This approach supports in continual improvement of systems and programs, so they remain current and reflect leading practice. We develop competent workforce that is equipped with knowledge and awareness to identify, manage, mitigate, or eliminate the hazards and risks within their work environment and our business.

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

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. To achieve this, we promote, educate, and support our workforce in making healthy lifestyle choices and recognising the importance of good mental health. We work with employees who have been injured and, when safe to do so, encourage them to return to work.

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 these impacts. We achieve this through collaboration with our local communities and government 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 effective and sustainable corrective actions and share the learnings to prevent repeat incidents. We implement assurance processes through which we test the suitability, design and implementation effectiveness of our controls and alignment with the International Council on Mining and Metals (ICMM) Performance Expectations.



Peter Xavier, Vice President Sudbury Integrated Nickel Operations A Glencore Company

ID: SUD-SD-POL-001	Owner: Sustainability Manager	Version: 0	Page 2 of 2
Review period:1 Year	Revised on: 01 Jan 2023	Next Review: 01 Jan 2024	Status: Approved
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