

# GLENCORE

30 April 2014

Mr. Pierre Gratton  
President and CEO  
The Mining Association of Canada  
1105 - 350 Sparks Street  
Ottawa, ON K1R 7S8

Dear Mr. Gratton,

Re: Letter of Assurance, Glencore Canada Nickel Assets

On April 30<sup>th</sup> 2014, Glencore Canada's Nickel Department (the Company) completed its verification of our 2013 Self-Assessment under the Towards Sustainable Mining (TSM) initiative for our Sudbury Integrated Nickel Operation (INO) and our Raglan Mine. As required by the Mining Association of Canada (MAC), third party verification of our TSM performance at our operating facilities in Canada is undertaken on a three year cycle.

Our verifiers, Rubinoff Environmental and MORCOM conducted the assurance using standard techniques based on those outlined in ISO 19011, *The Guidelines for Quality and Environmental Management Systems Auditing*, including the principles of auditing with due professional care, objectivity and systematic procedures. The verification was conducted in accordance with the MAC TSM Terms of Reference for Verification Service Providers.

The scope of the 2013 assurance process included six TSM protocols:

- Crisis Management Planning (Toronto, Sudbury and Raglan)
- Aboriginal and Community Outreach
- Safety and Health
- Tailings Management
- Energy and Greenhouse Gas Emissions Management
- Biodiversity Conservation Management

The verification consisted of interviews, data analysis, site visits, and the examination on a sample basis other evidence relevant to management's assertion of conformance to the requirements of the TSM Performance Indicators.

The findings of the assurance exercise are documented in three reports for each of the two operations and the Toronto office.

The review concluded that the TSM results for the period ending December 31, 2013 fairly state the company's performance, with the following findings as a result of the verification:

## **Sudbury INO**

- *Biodiversity Conservation Management* – Biodiversity Conservation Reporting was decreased from AAA to A as there is no evidence that public reporting on biodiversity conservation has been independently verified/reviewed (either internal or external).
- *Tailings Management – Operation, maintenance and surveillance (OMS) manual* was increased from B to A as the Tailings, Surface Water & Waste Rock Control Dams (Onaping Area Mines and Mill) OMS Manual is in conformance with the MAC Developing an Operating, Maintenance and Surveillance Manual for Tailings and Water Management Facilities.

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## Raglan Mine

- *Aboriginal and Community Outreach - Reporting* was increased from AA to AAA since COI feedback on engagement and dialogue processes and outcomes was actively sought and reported publicly by Raglan Committee.
- *Tailings Management – Tailings management policy and commitment* was reduced from AA to B as there is no evidence that the policy was communicated to the COI and the internal audit did not specifically assess whether the tailings management policy and commitment was in conformance with MAC's A Guide to the Management of Tailings Facilities.
- *Tailings Management – Tailings management system* was reduced from AAA to A as the internal audit did not specifically assess whether the implementation of the tailings management system was in conformance with MAC's A Guide to the Management of Tailings Facilities.
- *Tailings Management – Annual tailings management review* was reduced from A to C as no periodic formal reviews of the tailings management system is performed.

We acknowledge and agree with these findings and have modified our evaluation accordingly.

Yours truly



Scott Yarrow  
Vice President, Sustainability  
Glencore