TSM Summary Assessment Report

Facility Information

Name of company	Glencore
Name of facility	Canadian Copper Refinery
Address	220 Durocher ave, Montréal-Est, QC
Country of operation	Canada
Products/metals produced on site	Copper
Types of operations included in scope:	
Mining	☐
Concentrate blending	☐
Smelting	☐
Refining	☒
Other *(please explain)*	
Types of infrastructure included in scope:	
Roads	☐
Rails	☐
Ports	☐
Other *(please explain)*	☐

Vérifier and Verification Information

Name(s) of verifier(s)	Guillaume Carle Evelyne Desaulniers Meriem Raach Mélanie Rousseau
Name(s) of verifier(s') firm(s)	EEM Gestion ESS Inc.
Date(s) of verification activities (dd/mm/yyyy – dd/mm/yyyy)	30/05/2023 – 30/06/2023
Verification period	2022-2023
Summary of the verification methodology	The audit was carried out in accordance with the principles set out in the following standards and documents:

	• *ISO 19011:2018 – Guidelines for auditing management systems; and,* • Mining Association of Canada Audit Service Provider Mandate (revised November 19, 2021). The tasks and activities undertaken during the verification process are summarized below: • *Prior to the audit, copies of the facility self-assessments and supporting documentation were made available to EEM Gestion ESS Inc.;* • *Evidence was collected through interviews and submitted documents;* • *The information collected was evaluated based on the criteria set out in the performance standard protocols evaluated;* • *A closing meeting was held during each block of interviews.* This audit report, which contains the audit conclusion and the audit statement, has been produced.
Summary of the verification activities	• A kick-off meeting was held to prepare the audit; • The client submitted documentation for review by the auditors; • An opening meeting was held; • Collection of evidence was conducted by videoconference; • Working notes were taken by the auditors; • A representative number of external communities of interest listed by Glencore – Horne were sampled, according to the Squeglia c=0 method for an acceptable quality level of 90%; • A closing meeting was held; and, • The present report was produced.

Criterion	Rating	Comments
Indigenous and Community Relationships		
1. Community of Interest (COI) Identification	AA	The documented process includes the identification of: • Under-represented COI within the local context. • COI whose interest in the operation may be indirect and issues-based (e.g., provincial, national, and international NGOs). COIs are invited to provide input into how the facility identifies COI.
2. Effective COI Engagement and Dialogue	AA	Engagement processes are reviewed with COI to ensure they can effectively participate in identifying issues and opportunities and influence decisions that may interest or affect them. The facility has a consistent history of meaningful engagement with COI. Processes include consideration for COI identified as under-represented. Processes to build the capacity of COI to allow them to effectively participate in dialogue exist. COI contribute to periodic reviews of engagement processes to allow continual improvement. COI feedback on engagement and outcomes is actively sought and publicly reported. Opportunities exist for COI to provide feedback on public reporting.
3. Effective Indigenous Engagement and Dialogue	N/A	There is no Indigenous Communities that are directly affected by CCR's activities.
4. Community Impact and Benefit Management	AA	Processes are in place to avoid or mitigate prioritized adverse impacts that incorporate collaborative decision making with relevant COI. The identification and prioritization of opportunities to optimize benefits for COI consider opportunities that: a. Benefit a broad spectrum of the community. b. Can be self-sustaining beyond the productive life of the facility. Processes are in place to optimize benefits for COI that incorporate collaborative decision making with relevant COI. Decisions on how to direct contributions made by the facility to the community are made collaboratively with COI.

		In collaboration with COI, where possible, the facility regularly measures and analyzes the trends of identified prioritized adverse impacts. The facility also regularly measures and analyzes opportunities to optimize benefits and work with COI to prioritize and adaptively manage how gaps are addressed.
5. COI Response Mechanism	A	There is a response mechanism in place with a clear process to receive, manage and respond to COI grievances, comments, and requests, which: a. Captures reported incidents, concerns, and feedback. b. Assesses and determines which grievances require remedy. c. Responds in a timely manner. d. Is accessible. CCR have a process to track issues and concerns raised by COI, including status. CCR communicate status updates. COI are proactively and clearly informed on how to access the facility's response mechanism.
Safety and Health		
1. Commitments and Accountability	A	Commitments are defined and authorized by senior management and consistent with the intent of the MAC Safety and Health Framework. There is a process in place to ensure that employees, contractors, and suppliers who work at the facility are aware of the company's safety and health commitments. Accountabilities and responsibilities are understood at all levels. *However, no internal or external audit has been carried out in the last 3 years.*
2. Planning and Implementation	AAA	A documented safety and health management system is established, implemented, and maintained that incorporates: a. Objectives and targets, with supporting plans to achieve them. b. Hazard identification, risk assessment (HIRA) and control processes. c. Identification of high consequence hazards and related critical controls. d. An industrial hygiene program. e. Defined roles and responsibilities for safety and health management. f. Workplace inspections (e. g., Maintenance of safety and health records). Resources are assigned to establish, implement, maintain, and improve the safety and health management system and validate effectiveness of controls.

		An external audit has been conducted to determine whether planning and implementation of the safety and health management system meets the requirements of Level A. The industrial hygiene program is subject to the oversight of a qualified hygienist.
		Facility-specific and especially hazardous tasks have been identified, and critical controls for those tasks identified through an established controls identification methodology (e.g., bowtie analysis).
3. Training, Behaviour and Culture	AAA	The commitment to safety and health is visibly embedded throughout the facility.
		Facility management visibly demonstrates commitment with one-on-one interactions with employees.
		Trainers are assessed for effectiveness.
		A program is developed to support worker's mental health and provide assistance when required.
4. Monitoring and Reporting	AA	An internal audit has been conducted to determine whether the safety and health data and information collection, compilation and reporting meets the requirements of level A.
		Thresholds and triggers related to the performance of critical controls are in the process of being developed and implemented, with some thresholds and triggers already in place.
		The monitoring and audit programs include a focus on critical controls.
		Health and safety performance is reported to the public at least annually. The 2021 and 2022 SD reports show OHS performance in addition to the number of safety interactions, hours of training provided, "super good moves", "good moves" and initiatives (reportable accident frequency, time loss accident frequency). Additionally, SD report are mailed to citizens. *https ://www.glencore.ca/fr/ccr/developpement-durable* *https://www.glencore.ca/fr/ccr/developpement-durable/sante-securite* *https ://www.glencore.com/.rest/api/v1/documents/static/63d21a4e-30f6-40ca-b0f6-00ec64a718cf/GLEN_2022_sustainability_report.pdf* *However, no external audit has been carried out to determine whether the collection, compilation and reporting of health and safety data and information meets Level A requirements.*

5. Performance	AA	Performance targets are set for both leading and lagging indicators.
		Senior management regularly reviews site performance objectives and improvement plans.
		CCR benchmarks its safety and health performance against its peers.

Crisis Management and Communications Planning - FACILITY		
1. Crisis Management and Communications Preparedness	YES	A Crisis Management and Communications Plan is in place.
		Credible threats and risks have been identified for the company and are reviewed annually and shared with the Corporate Office. Intervention protocols are established to address the identified risks.
		A general Crisis Management Team has been set up, including staff on duty. Team alert mechanisms are tested weekly and mechanisms to alert employees are tested annually.
2. Review	YES	The Crisis Management and Communications Plan is regularly reviewed and updated, and if needed, particularly when new people join the Crisis Management Team. The plan is shared with Corporate Office.
3. Training	YES	CCR conduct simulation exercises in the Conference Room annually as well as a full simulation regularly.

Crisis Management and Communications Planning - CORPORATE		
1. Crisis Management and Communications Preparedness	NO	The Crisis Management and Communications Plan is not a controlled document and is not systematically reviewed.
2. Review	NO	The general crisis management and communications plan is not regularly reviewed and updated when there is a change of personnel of those associated with implementation of the crisis management and communications plan, when there is a change in business (e.g., a new mine), and/or every 18-24 months.
3. Training	YES	Simulation exercises are conducted annually with the Norfalco Team.

Preventing Child and Forced Labour

1. Preventing Forced Labour	YES	There are processes in place that are commensurate to jurisdictional risks to ensure forced labour, including bonded or indentured or involuntary prison labour is not used.
2. Preventing Child Labour	YES	There are processes in place that are commensurate to jurisdictional risks to ensure that no child under the age of 18 is engaged in work which by its nature or the circumstances in which it is carried out is likely to jeopardize the health, safety or morals of young persons as defined in national law or regulation.

Climate Change

1. Corporate climate change management	A	There is a demonstrated corporate climate change strategy that is supported by defined actions, including integration of the strategy into business planning for existing activities and in considerations for new projects.
2. Facility climate change management	AAA	An energy and GHG emissions management system is put in place. The energy and GHG emissions management system has been subject to an internal and external audit. In addition, key performance indicators relating to the reduction of energy consumption are assigned, compensations are integrated into the management system and active partnerships are maintained with certain communities of interest on the management of climate impacts.
3. Facility performance targets and reporting	A	Energy and/or GHG emissions performance targets have been set for several years. Public reporting takes place on energy and/or GHG emissions using recognized and externally verified quantification methodologies. Information on the facility's assessment of potential physical climate impacts and plans or actions to manage the associated risks is shared publicly and updated as assessments or plans are updated.

Biodiversity Conservation Management

1. Corporate biodiversity conservation commitment, accountability, and communications	A	There is demonstrated senior management commitment, consistent with the intent of the TSM Mining and Biodiversity Conservation Framework and to the application of the mitigation hierarchy to achieve stated biodiversity outcomes. The commitment to biodiversity conservation has been communicated to relevant employees, contractors and facility-level COI. Roles, responsibilities and accountabilities for implementation of the commitment are clear. Resources have been assigned to support implementation of the commitment. *However, no internal or external audit has been carried out in the last 3 years.*
2. Biodiversity conservation planning and implementation	AAA	Biodiversity conservation management has been integrated into the facility's broader operational strategy.
3. Biodiversity conservation reporting	A	Internal and external reports on Biodiversity conservation are products. External report is available here: Sustainability (glencore.com)

Water Stewardship

1. Water Governance	A	There is a demonstrated senior management commitment to water stewardship that is consistent with the intent of the TSM Water Stewardship Framework. The commitment to water stewardship has been communicated to relevant employees, contractors and water related, facility-level COI. Roles, responsibilities, and accountabilities are defined. *However, no internal or external audit has been carried out in the last 3 years.*
2. Operational Water Management	A	A systematic approach to operational water management has been established and implemented. A site-wide water balance has been prepared for the facility. Water balances are updated on a pre-defined frequency and incorporate monitoring data. A water monitoring program addresses both surface water and groundwater, including both water quality and quantity parameters for the monitoring program has been informed by identified risks. Controls have been established based on identified risks and are those controls being implemented.

		Response and contingency plans have been established for water-related risks and incidents. Relevant employees and contractors have been provided with training that is in accordance with their roles and responsibilities. Controls have been established based on identified risks and are those controls being implemented. Response and contingency plans have been established for water-related risks and incidents. Relevant employees and contractors have been provided with training that is in accordance with their roles and responsibilities. *However, no internal or external audit has been carried out in the last 3 years.*
3. Watershed-scale Planning	AAA	CCR participates in Collaborative Monitoring at the watershed scale.
4. Water Reporting and Performance	A	Progress on actions to achieve objective(s) or target(s) are regularly tracked and reported to facility-level senior management. Public reporting on water includes performance relative to established objectives and targets. Sustainable Development Reports are available here: https ://www.glencore.ca/fr/ccr/developpement-durable At the time of writing this report, the 2022 version was being approved for publication. 2021 version is available on website.
Responsible Sourcing (for compliance with ICMM)		
1. Corporate Governance and Ethical Conduct	Yes	CCR has elements in place to address: • Legal compliance; • Code of Conduct; • Combat against bribery and corruption; • Political contributions; • Transparency of taxes, ownership and transfer pricing; • Accountabilities and reporting; and, • Engagement Corporate communities of interest.

2. Integration of Sustainable development into business strategy and decision-making	Yes	The principles of sustainable development are integrated into CCR's strategy and decision-making. The CCR applies Glencore's supply chain policy. Due diligence processes are in place and used to identify risks associated with the activities and practices of facilities and supply chain partners with the goal of preventing negative impacts. CCR is certified LBMA and LME.
3. Respect of human and labor rights	Yes	CCR has the elements required for: • Compliance with the UN Guiding Principles on Business and Human Rights; • Due diligence – conflict and high-risk areas; • Resettlement; • Security and human rights; • Labor rights; • Employee remuneration and employment conditions; and, • Women, diversity, and mining.
4. Environmental performance	Yes	CCR has the elements required for: • Risk management, environment; • Closure; • Pollution prevention and waste management; • Hazardous substances; and, • Circular economy.
5. Social, economic and institutional Development	Yes	CCR has a local procurement policy
Responsible Sourcing (for compliance with Copper Mark)		
1. Corporate Governance and Ethical behavior	Yes	CCR has the elements in place to ensure: • Legal compliance; • Combat against bribery and corruption; and, • Transparency of taxes, ownership and transfer pricing.
2. Integration of Sustainable development into business strategy and decision-making	Yes	CCR applies Glencore's supply chain policy. This policy raises awareness among contractors and suppliers to operate responsibly, in compliance with standards of ethics, health and safety, human rights and social and environmental performance comparable to the standards to which CCR subscribes.

3. Respect of human and labour rights	Yes	CCR has the elements required for: • Compliance with the UN Guiding Principles on Business and Human Rights; • Due diligence – conflict and high-risk areas; • Resettlement; • Security and human rights; • Labor rights; • Employee remuneration and employment conditions; and, • Women, diversity, and mining.
4. Environmental Stewardhip	Yes	CCR has the elements required for: • Risk management, environment; • Closure; and, • Pollution prevention and waste management.
5. Social, Economic and Institutional Development	N/A	There is no cultural heritage or craft and small-scale mining on the site or near CCR. A corporate cultural heritage standard is in place.

Statement of Verification

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The external verification was conducted in accordance with the TSM Verifier Terms of Reference and, accordingly, consisted primarily of interviews, data analysis, and examination (on a sample basis) of other evidence relevant to management's assertion of conformance to the requirements of the TSM performance indicators.	☒ The external verification was conducted in accordance with the TSM Verifier Terms of Reference.
The scores indicated in this report are verified as being accurate based on the evidence reviewed during the external verification of this facility.	☒ The scores in this report are considered accurate based on this verification.
Limitations	No limitations were encountered during this external verification.
Additional comments	-
Name of verifier	Guillaume Carle Evelyne Desaulniers Meriem Raach

	Mélanie Rousseau
Date of statement of verification	July 10th, 2023
Verifier signature	