

**Glencore's full statements in response to questions from The Narwhal between Nov. 14-24, 2023**

This exchange has been formatted for ease of reading.

**The Narwhal's initial questions:**

- The Elk Valley coal mines are a source of water pollution that's affecting a transboundary watershed. How will Glencore's purchase affect ongoing efforts to address this pollution? Will Glencore meet or exceed Teck's planned investments?
  
- I understand the pollution could be subject to an international inquiry under the 1909 Boundary Waters Treaty between Canada and the U.S., with a reference coming potentially by the end of the year. What is Glencore's position on such an inquiry?

**Glencore response:**

At this stage, I would like to point you to our commitment on water quality treatment technologies that can be found in our press release (attached). We are not going to comment on your second point.

**The Narwhal's follow up questions:**

I've heard from some organizations that say the planned sale of the Elk Valley mines is "alarming" and have raised concerns about Glencore's record and in particular have noted:

- that in 2022 Glencore pled guilty to bribery, corruption, and market manipulation charges
- concerns about Glencore's "terrible record" on environmental and human rights
- concerns about the Columbia Falls Aluminum Plant, a Superfund site and cause of legacy pollution on the Flathead River in Montana and say Glencore has resisted removing toxic aluminum plant waste and adequately cleaning up that site

How does Glencore respond to these concerns?

**Glencore's response:**

Q: that in 2022 Glencore pled guilty to bribery, corruption, and market manipulation charges

A: "Glencore is a different company today and is committed to being a company that creates value for all stakeholders by operating transparently under a well-defined set of values, with openness and integrity at the forefront.

"Glencore has taken significant action over the last several years towards implementing a world-class Ethics and Compliance Programme built around risk assessment, policies,

procedures, standards and guidelines based on international best practice, associated training and awareness initiatives as well as monitoring systems.

“Under the terms of our resolutions with the DOJ, we have appointed two independent compliance monitors evaluate the effectiveness of our Programme (including an assessment of our culture) and internal controls over a three year period. We are required to facilitate the monitors’ access to all information of the Company (and its subsidiaries), including documents and resources, records, facilities and employees as reasonably requested by the monitors that fall within their mandate, subject to applicable laws.”

Further information can be found at: [Investigations \(glencore.com\)](#)

Q: concerns about Glencore's "terrible record" on environmental and human rights

A: “Our assets are located in diverse contexts, some in highly developed countries with strong legal and political frameworks, and others in more challenging socio-political circumstances with a history of conflict, limited basic services, and weak rule of law. We require our industrial assets to adopt an inclusive community approach informed by the local context. As a member of the societies where we operate, we work in partnership with government, civil society and development agencies to share knowledge, build capacity and contribute to enduring social and economic outcomes.

“We aim to respect human rights and seek to learn about the traditions, cultures, perspectives and development priorities of people with whom we engage, to build trusting and constructive long-term relationships, and to contribute to the social and economic development of affected people and society more widely.

“Glencore is committed to upholding the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We recognise and uphold the rights of our workforce to a safe workplace, freedom of association, collective representation, collective bargaining, fair compensation, job security and development opportunities. Through our policies, standards, and processes, we are committed to respecting human rights in accordance with the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the UNGPs and the UN Global Compact.”

Regarding the environment, the following links will take you to our environmental policy and SD report. Please do take the time to go through both: [Environmental+Policy.pdf \(glencore.com\)](#) and [GLEN\\_2022\\_sustainability\\_report.pdf \(glencore.com\)](#)

Q: concerns about the Columbia Falls Aluminum Plant, a Superfund site and cause of legacy pollution on the Flathead River in Montana and say Glencore has resisted removing toxic aluminum plant waste and adequately cleaning up that site. How does Glencore respond to these concerns?

A: "After it permanently closed the facility in 2015, Columbia Falls Aluminum Company (CFAC) demolished the buildings on the site and worked cooperatively with the US Environmental Protection Agency, the Montana Department of Environmental Quality (MDEQ) and the community to thoroughly assess site conditions and evaluate remedial options according to applicable standards. After extensive public input, EPA will select a set of remedies to address site issues. CFAC will continue to work cooperatively with EPA and MDEQ to fulfill its obligations to the community and under applicable law. CFAC looks forward to returning the site back to productive reuse. Glencore will continue to ensure that CFAC has the resources it needs to meet its obligations."

Key points to note:

Bullet points:

- In 2021, CFAC conveyed 722 acres of property along the Flathead River to Montana Fish, Wildlife and Parks for a new Bad Rock Canyon Wildlife Management Area.
- CFAC closed the site in 2015, demolition of the site infrastructure began in 2015 and was complete in 2019
- CFAC initiated and formed a Community Liaison Panel consisting of stakeholders that included members of the public, local business leaders, elected officials from the nearby municipality of Columbia Falls, congressional representatives and regulators.
- CFAC has held 14 meetings of the Community Liaison Panel since 2015. EPA representatives have participated in 13 of those meetings.

The minutes and of each public meeting and all key site documents are available on CFAC's web site. As well all generated site investigation reports are listed.

- CFAC has sent out 22 community updates to a mailing list averaging 650 recipients.
- In 2021, CFAC performed early remedial work, with EPA and MDEQ approval, to safely return the Flathead River flow to its natural channel.
- CFAC has voluntarily monitored the drinking water wells of nearby residents since 2015. Results show that the wells have not been impacted by the site.
- CFAC conducted significant investigations at the site with over 1,000 soil samples, 400 groundwater samples, 200 surface, water samples, 100 off-site samples and 70 sediment samples to thoroughly evaluate the issues.

### **The Narwhal's follow up questions:**

Thanks for these comments. I have just a couple more questions that I'm hoping you can respond to by end of day Nov. 23.

First, I mentioned concerns about Glencore's human rights record. Do you have anything to add to your comments in response to the Business and Human Rights Resource Centre [report](#) that mentions 70 allegations of human rights abuses against mining projects Glencore is involved

with between 2010 and 2022, including the bribery and market manipulation charges, environmental impacts and allegations of poor working conditions?

Additionally, does Glencore have any comments in response to the situation in Quebec, where the provincial government is planning to spend \$88.3 million to support the relocation of some 200 families that currently live in an area contaminated by a local copper smelter, owned by Glencore, as [CBC reported in March](#)?

And, finally, I understand in B.C., that Glencore [owes about \\$8.5 million in security](#) payments to cover the estimated reclamation liability at three of its mines. Why has the company not fully paid these securities? And will Glencore fully bond the Elk Valley mines as part of the purchase agreement?

**Glencore's response:**

Q: First, I mentioned concerns about Glencore's human rights record. Do you have anything to add to your comments in response to the Business and Human Rights Resource Centre [report](#) that mentions 70 allegations of human rights abuses against mining projects Glencore is involved with between 2010 and 2022, including the bribery and market manipulation charges, environmental impacts and allegations of poor working conditions?

A: Ainslie, please see my initial responses to you which can be found below in our first email exchanges

Q: Additionally, does Glencore have any comments in response to the situation in Quebec, where the provincial government is planning to spend \$88.3 million to support the relocation of some 200 families that currently live in an area contaminated by a local copper smelter, owned by Glencore, as [CBC reported in March](#)?

A: The expansion of the buffer zone between the 100 year old smelter and the community is an initiative of the Québec Government that Glencore supports. This urban planning project is in addition to our long term plan to upgrade the facility with the latest technology and to further reduce the smelter's environmental footprint. Glencore has committed C\$500m to this project.

Q: And, finally, I understand in B.C., that Glencore [owes about \\$8.5 million in security](#) payments to cover the estimated reclamation liability at three of its mines. Why has the company not fully paid these securities? And will Glencore fully bond the Elk Valley mines as part of the purchase agreement?

A: Every year each site calculates the estimated cost for its reclamation and discloses this to the Government of British Columbia in the annual reclamation report. For 3 of our 4 sites the estimated cost of closure is higher than the current reclamation security in the mine permits. This year, the BC Government has asked for the difference which is due March 31 2024. It will be bonded.

In terms of EVR, we will ensure that EVR complies with all applicable requirements regarding bonding. This is set out in one of our commitments that we announced last week.