

CASE STUDY

Glencore eliminates audit findings with Nimonik Compliance Software

Location: Ontario and Quebec, Canada

Industry: Mining, Shipping, and Metals Refining

"Auditors love Nimonik! It's a one-stop shop. No need to flip through endless papers and folders, it's all in one place: obligations, reviews, history, etc." - Moe Moreau, Glencore Canada.



Customer Profile

<u>Glencore plc</u> is a Swiss multinational commodity trading and mining company with headquarters in Baar, Switzerland. The current company was created through a merger of Glencore with Xstrata on 2 May 2013. Its assets include copper, coal, nickel and zinc and lead mining, processing, smelting and recycling operations and projects.

Sudbury INO has operations including exploration, two underground mines (Fraser and Nickel Rim South), Strathcona Mill and the Sudbury Smelter, which are all located in the Sudbury basin. The Sudbury Smelter processes the nickel-copper concentrate as well as custom feed materials to produce a nickel matte, which is sent to port facilities in Quebec City and then to Glencore's <u>Nikkelverk</u> refinery in Norway.

Problem: Growing and still managing compliance on disparate technologies like Excel and Sharepoint, Glencore needed a solution that could grow and help it stay in compliance with growing obligations.

Comprehensive Compliance

Solution: In 2010, they decided to implement Nimonik's solution for <u>regulatory and standards compliance</u>. Nimonik has continuously supported Glencore Sudbury INO as a compliance solution partner since 2010.

Benefits of Nimonik at Glencore Sudbury Integrated Nickel Operations

- A "one stop shop" for all compliance obligations
- minimal compliance findings over the last 5 years
- Internal and external audits are a "breeze"

About Maurice "Moe" Moreau



Moe Moreau
Environmental Management
Systems Lead at
Glencore Sudbury INO

Chemical Engineer Maurice "Moe" Moreau's journey with Glencore started 27 years ago in 1996 with a company called Falconbridge which eventually became Xstrata and finally, Glencore. Moe first started in the technical department before moving around to various positions including staff and training departments before finally landing with the environment team as a coordinator and eventually to lead, managing all six sites, ISO certifications and all regulatory and legal affairs including the Port of Quebec Facility.

Moe belongs to the Sudbury, Nickel Integrated Operations group, a 1300 person team that covers two underground mines, a concentrator, a smelter and exploration group and the previously mentioned port facility all reporting into a Vice President of Nickel Operations.





Moe Moreau Responsibilities

For Moe, there's one direct report (a document manager) but a host of dotted line relationships,

"I have one person as a document manager, but everyone in the environmental works closely with me because I manage all the systems and they have to maintain compliance to all the requirements of those systems and make sure that they are from an operational perspective, meeting regulations, staying on top of things, and that our programs are always continually improving with the plans that are in place.

I drive the whole process but indirectly there are a lot of people that feed into the systems in order to get the excellent work done every year."

A World of Constant Change

As Glencore continued to grow and as the mining industry continued to modernize and move towards strong EHS practices, there were challenges of keeping up to date with many changes to its legal obligations.

Comprehensive Compliance

Historically, regulatory monitoring and compliance were done through Microsoft Excel and Sharepoint and reading government publications. Other teams used a variety of solutions that did not talk to each other. Moe explained to Nimonik that,

"We live in an evolving world, with everything always changing and so it is difficult to stay on top of all the regulations and legislation that apply to us. We're managing it all in Excel with so many people having their hands in the pie, so it quickly became a really big issue. On top of that, we had people moving around to other departments or leaving".

It was around 2010, that Glencore Sudbury INO decided it needed a central system that could help meet all its obligations. A core business objective for all Glencore sites is to maintain a certified environmental management system (ISO 14001) that could help maintain compliance across their operations. To achieve this, it is critical that Sudbury INO accurately and precisely monitor changes and alert appropriate people and teams when compliance gaps emerge. Moe clearly stated that,

"Back in 2010, there were areas where we were falling short. Internally we had many meetings and brought together many subject matter experts who helped conclude that we really needed a system that would really bring it all together for us."

The Need for Better Compliance Solution

Nimonik was founded in 2008 with the idea that organizations would face growing regulatory burdens and would struggle to keep on top of their obligations. Most companies in 2008 were still using homegrown solutions to track their requirements in laws, regulations and standards. Excel was the usual suspect, but more and more companies recognized that it was not a long term solution.

Expertise in Canadian Law

While Sudbury INO evaluated many systems, what differentiated Nimonik was its expertise in Canadian law as it was, and remains, a Canadian company. Nimonik could act as a compliance partner to Glencore Sudbury INO and many ideas and feedback from the Glencore team made it into Nimonik's product development.

Together, Nimonik visited the Glencore Sudbury locations and attentively listened to the EHS team's business requirements, allowing the delivery of a comprehensive solution for compliance. One notable feature that Glencore Sudbury INO requested and which is still a core part of Nimonik is the logging of all revisions of regulatory changes. These logs have proved invaluable during audits as Glencore Sudbury INO and all Nimonik customers can point to the records of their reviews of regulatory change and demonstrate an ongoing effort to maintain compliance.



Consolidating Systems into One Comprehensive Solution

As Glencore the first step was utilizing Nimonik as a central repository for all their legal and regulatory obligations which then evolved into a solution that could track updates, and even provide a historical look at changes. Moe outlined how,

"It is really great to have a comprehensive platform for documentation, tracking, reporting and assigning responsibilities to individuals."

Evolving from a single administrator 13 years ago to today, the platform has numerous users who are "subject matter experts" and who are responsible for compliance at the two mines, the smelter, Mill and the port operations. Users can have personalized access to the system and can play a leadership role for their environmental area, allowing Moe to delegate and supervise compliance across the board.

Moe explained how the Nimonik solution has evolved over time,

"At Glencore Sudbury INO, Nimonik's solution was great from the start and sufficient for Glencore. It is stable and ready for use out of the box, but we have expanded and personalized the system over the years to match our needs. In addition, Nimonik has continued to improve their platform which has added tremendous value for us."

Beyond the actual day-to-day use of the platform, Glencore experienced first hand the willingness of the Nimonik product management team to listen to requests and for the customer success organization to deliver an amazing customer experience.

For example, in 2019, Glencore Sudbury INO senior management gave Moe the green light for an ambitious consolidation project: "*put everything on one system!*" The first place Moe turned to was his trusted solution provider Nimonik, who helped map out an ambitious 8 month project and how Nimonik's platform could help Glencore achieve its goals of consolidating their environmental management systems.

At the time, Glencore Sudbury INO had two registers and two structures for their different assets in Nimonik and outside of Nimonik. Sudbury INO had legal registers for our exploration operations, the concentrator, and one mine in the Nimonik system, but the port operations were still managing their obligations in Excel. So Moe decided to standardize and centralize the data. At the time, Sudbury had two separate certified systems, but Glencore had tasked Moe with consolidating the certifications and integrating the required data in one system.

Moe explained that

"Nimonik worked very closely with us on the environmental management system consolidation project, every level of the Nimonik organization did an excellent job and really helped make the initiative a success."

Comprehensive Compliance

The end result for Glencore was a single source of truth: one compliance register instead of two, amalgamation of operations, everything integrated and delivered on time. Moe also provided a great overview of this project during a webinar with Nimonik, "How to merge two environmental management systems".

The Benefits of Nimonik

Glencore Subdury INO has gained numerous advantages with Nimonik. First and foremost, their ISO 14001 audits - both internal and external - have continuously resulted in minimum findings. Nearly all ISO 14001 audits turn something up, which requires costly follow-up and actions - becoming a proactive compliance organization brings tremendous cost savings.

As a mining operation with a smelter and a port operation, Moe stated that

"Sudbury INO has a lot of obligations! We are members of numerous organizations like the International Council of Mining (ICMM) and Mining Association of Canada, who all impose various obligations on their members. In addition to the regulatory requirements, a mining operation has a lot of items to track for compliance. Nimonik is fantastic at making those external obligations easy to track.

Auditors love it! It's a one-stop shop. No need to flip through endless papers and folders, it's all in one place: obligations, reviews, history, etc."



Comprehensive Compliance

Next Steps

The next step for Glencore Sudbury INO's use of Nimonik is to add all of their permits and internal documents to the Nimonik compliance solution. Nimonik does the hard work of extracting the requirements in these PDFs and then Glencore can issue action items and ensure that they remain manage all compliance tasks in a single location. Sudbury INO is also planning to integrate registers and compliance actions for both the safety group and the human resources group in the next year.

Moe closed out his conversation with Nimonik by explaining,

"We've seen so many benefits from the perspective of legislation and regulations, now we're stepping up even further, and using it for other obligations, permits and everything else! I can see it as a broad auditing and compliance solution to help us across all of our regulated areas - from environment to safety to HR and cybersecurity. We would like to ensure we have 100% coverage of our compliance obligations for the entire organization"

Conclusion

Nimonik is very grateful for the long relationship with Sudbury INO and Moe's team. Over the past 13 years, Nimonik and Glencore have worked together to improve the software and bring compliance best practices to companies across the mining industry, across Canada and internationally. The journey is not over and with the addition of more compliance requirements, additional permits and documents and more users - Nimonik plans to continue to add value and help Sudbury INO move towards proactive compliance.

To learn more about how Nimonik can help your organization embark on this journey of proactive compliance, do not hesitate to contact us at info@nimonik.com

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