

Responses provided by Glencore and MRN

Dated November 3, 2025, Voices

In October 2025, Voices reached out to Glencore and Mineração Rio do Norte (MRN) and asked the two companies to provide statements in response to the concerns raised by Voices in regards to transparency and security at the tailing management at MRN.

Glencore responded on October 24, 2025:

“MRN is an independently operated joint venture in which Glencore has a 45% non-controlling stake. For joint ventures we do not control or operate, we seek to assert our influence to encourage them to act in a manner consistent with our policies, such as through representation on the board.”

Attached to Glencore’s response was the response provided by **Mineração Rio do Norte (MRN)** dated October 22, 2025:

“Mining activities in the area where MRN operates are subject to an environmental licensing framework, which mandates comprehensive studies on the potential impacts of proposed activities and stipulates environmental and social performance conditions with which every licensee must comply. MRN operates in strict adherence to Brazilian laws and regulations, and its environmental management system is certified to ISO 14001. MRN discloses information on its Tailings Dam System, which is publicly available to all stakeholders on the website: <https://gistm.mrn.com.br/>”

“Please see below some technical clarifications to the points raised in your letter:”

Self-Rescue Zones

- “There are no residences, urban facilities, or communities within the Self-Rescue Zones (ZAS) mapped by MRN, as confirmed by an independent consultancy.”
- “According to Brazilian legislation, the ZAS encompasses the region corresponding to a inundation wave arrival time of 30 minutes or a distance of 10 km. Given their location more than 23 km from

MRN's tailings dams, the 2018 PAEBM (Emergency Action Plan for Mining Dams) did not identify risks to these communities, contrary to what is stated in your letter.“

- “PAEBMs are validated by external audits and submitted to the National Mining Agency (ANM), resulting in the issuance of Declarations of Conformity and Operability.”

Dam Safety

- “MRN emphasizes that its tailings structures have been assessed as meeting legislative requirements for stability and possess current Declarations of Stability Conditions for all 27 tailings reservoirs and two sediment dams.”
- “The company adheres to legislation regarding credible dam break studies, and all changes in structure classification were made in compliance with Brazilian legislation.”
- “MRN's operations are frequently inspected by federal licensing agencies, with an official report issued after each inspection. In 2024 and 2025, MRN underwent six inspections by the primary licensing and oversight bodies, IBAMA and ICMBio, which found no deviations in the fulfillment of its obligations.”
- “MRN also maintains a robust, 24-hour monitoring system for its reservoirs and dams. This system includes daily inspections, InSAR monitoring, over 1,000 installed sensors, and remotely activated sirens.”

Water Quality

- “The Brazilian Federal Prosecution Service initiated a legal proceeding to investigate MRN's alleged responsibility for turbidity in streams and lakes in the region. A comprehensive investigative procedure (Public Civil Inquiry) was opened and conducted over a six-year period.”
- “The legal proceeding concluded that there was no evidence or indication that MRN's operations caused pollution in the allegedly impacted water bodies. Based on these findings, the investigation reaffirmed MRN's compliance with legal standards. The Inquiry has since been formally closed.”
- “MRN maintains a solid Water Control and Monitoring Program, which monitors over 245 sampling points distributed across surface water, springs, groundwater, effluents, streams, lakes, the Trombetas River, and tubular wells, both within and surrounding MRN's operational areas and inside

the forest. The program includes monthly inspections of underground and surface waters, and inspections of springs three times a year.”

- “The Program’s analyses are reported to regulatory and environmental agencies. Analyses conducted in 2024 demonstrate compliance with legal standards.”
- “Local communities actively participate in sample collection and receive detailed analysis results monthly, ensuring accessibility.”

Community Relations

- “We disagree with statements from the 2021 report referenced in your letter in relation to information sharing with communities.”
- “Information from the PAEBMs is shared with communities through visits, seminars, educational booklets, and drills, with the participation of the municipal Civil Defense. In 2024, four orientation seminars and one emergency drill were conducted. In 2025, PAEBM seminars were hosted in the communities of Boa Vista, Saracá, and Boa Nova.”
- “During these sessions, communities are informed about the Tailings Management System, monitoring efforts, and the safety tools implemented for the structures.”
- “MRN maintains a routine of meetings, dedicated dialogue forums, and various other daily engagement initiatives. These platforms facilitate a continuous exchange of information and help foster active listening to community needs and existing demands”