

# RCMS® Statement of Conformity

## NorFalco (A Glencore Company)

100 King Street West, 69th floor,  
Toronto, Ontario, Canada

*has been found by Midland Engineering Limited to conform to  
the requirements of the*

### American Chemistry Council's Responsible Care Management System®

Technical Specification: RC101.07

Scope: All Responsible Care® / EHS&S activities associated with  
Marketing and Distribution of Sulfuric Acid.

Certificate Number: MEL2503-05

Issue Date: 20 March 2025

Lead Auditor:  
Greg Underwood

Approved By:

*Shelley Wickman*

Shelley Wickman, VP



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MEL asp-011



Midland Engineering, Ltd

American Chemistry Council – Chemistry Industry Association of Canada  
Responsible Care® Certification/Verification Model

Submitted by Greg Underwood, Midland Engineering, LTD to CIAC

As part of the RCMS® audit of NorFalco (A Glencore Company), 2025

<b>Audit team's conclusions about the effectiveness of the management system:</b>	
	Based on the results of the audit, the audit team determined that the management system was effectively implemented and maintained per defined requirements and is deemed capable of achieving expected outputs.
✓	Based on the results of the audit, the audit team determined that the management system was effectively implemented and maintained per defined requirements and is deemed capable to achieve expected outputs, except as noted in the nonconformities.
	Based on the results of the audit, the audit team determined that the management system was not effectively implemented and maintained per defined requirements nor deemed capable to achieve expected outputs. The audit team recommendation is for "Certification Review".

<b>Audit team's conclusions about the effectiveness of the CIAC Other Responsible Care® Requirements and commitment to Responsible Care® Ethic and Principles:</b>	
✓	Based on the results of the audit, the audit team determined that the CIAC Other Responsible Care Requirements and commitment to Responsible Care Ethic and Principles were effectively implemented and maintained per defined requirements and is deemed capable to achieve expected outputs.
	Based on the results of the audit, the audit team determined that the CIAC Other Responsible Care Requirements and commitment to Responsible Care Ethic and Principles were effectively implemented and maintained per defined requirements and is deemed capable to achieve expected outputs, except as noted in the nonconformities.
	Based on the results of the audit, the audit team determined that the CIAC Other Responsible Care Requirements and commitment to Responsible Care Ethic and Principles were not effectively implemented and maintained per defined requirements nor deemed capable to achieve expected outputs. The audit team recommendation is for "Certification Review".

A- Description of Company, Audited Facilities, Process and Scope of Audit

NorFalco (A Glencore Company) is the Merchant Marketer of parent company (Glencore) sulfuric acid in North America. The audit took place at Glencore Canada Corporation headquarters at 100 King Street West, 69<sup>th</sup> Floor, Toronto, Ontario M5X 2A1

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B- Summary of the evidence relating to:

- the capability of the management system to meet applicable requirements and expected outcomes.
- the internal audit and management review process.

Confirmed that Norfalco (A Glencore Company) effectively identified and manages relevant hazards and risks related to their business. The company provided evidence of regular, ongoing improvements in their operation / management system. Their systems for customer and service provider management are very effective / robust. Commercial partner selection and oversight are also well developed and effective. The company ensures compliance with regulatory and non-regulatory requirements. An effective internal audit process was confirmed. The top management at the company are knowledgeable, engaged and fully supportive of the Responsible Care management system.

C- Summary of the evidence relating to:

- the capability of the Other Responsible Care Requirements and commitment to Responsible Care Ethics and Principles to meet applicable requirements and expected outcomes.

The Norfalco (A Glencore Company) Executive Senior VP was interviewed regarding Leadership and Management commitment to the Responsible Care Principles and the implemented management system. It was confirmed that top management at the organization understands Responsible Care requirements / expectations and ensures the operation follows the Guiding Principles. Top management is well informed, regularly updated and effectively monitors the performance of their management system. The organization supports and participates in CIAC events / committees. Employee Responsible Care training stresses three key commitments:

- Principles – guide judgment and decisions every day
- Codes of Practice – Operations/Stewardship/Accountability
- Plan-Do-Check-Act Cycle – for continuous improvement

The company's training, communications and guidance documentation help to ensure an effective and ethical Responsible Care management system.

- Observations on public engagement and communication of the Worst Case Scenario – not applicable to Norfalco (A Glencore Company), they are a sales office located in Toronto
- Summary and observations of off-site meeting with Community Representatives – not applicable to Norfalco (A Glencore Company), they are a sales office located in Toronto

- Successful (excellent/Best) Practices to be shared – not applicable to Norfalco (A Glencore Company), they are a sales office located in Toronto

**Non-Conformities Identified:**

A process for assessing stakeholder communications effectiveness was not found. NorFalco (A Glencore Company) conducts customer and service provider screening and periodic visits, however, assessing NorFalco's (A Glencore Company) communications effectiveness is not specifically included in those processes.

**Opportunities for improvement identified:**

It would be useful to include physical and cyber security, as well as terrorism, in the NorFalco (A Glencore Company) Risk Manager application.

Additional interested parties should be added to the NorFalco (A Glencore Company) list, including US regulatory authorities, NorFalco's insurer and Midland Engineering Ltd.

Ensure that NorFalco's prioritized risks are taken into account when establishing goals, objectives and targets. Also ensure that the required timeframes, responsibilities, and resources for accomplishment are documented.

It would be useful to review and confirm the planned frequency of internal audits. The frequency should be based upon the results of previous audits, the organization's risks and management system changes.

Indigenous Code Elements are not applicable to Norfalco (A Glencore Company), they are a sales office located in Toronto.

Norfalco (A Glencore Company) responded to the minor non-conformance. The lead auditor reviewed and accepted the response. Evidence of correction was provided.

Based on the results of the audit, Norfalco (A Glencore Company) receives a "Pass". The audit team recommends that Norfalco (A Glencore Company) be issued an RCMS® Statement of Conformity.

Auditor(s): Greg Underwood, lead auditor

Date: March 20, 2025