

# RESPONSIBLE SUPPLY CHAIN REPORT

NORICKEL GROUP  
2024





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by the Board of Directors  
of MMC Norilsk Nickel  
Minutes No. GMK/16-pr-sd dated 26.05.2025

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Change Committee  
of MMC Norilsk Nickel's Board of Directors  
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by the Management Board  
of MMC Norilsk Nickel  
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"In the context of rapidly changing market demands, supply chain management is not only a key driver of sustainable business growth but also an essential lever for ensuring safety and efficiency. At Nor Nickel, we systematically apply sustainability standards at every stage of the supply chain. This enables us to comply with regulatory requirements and industry standards while building long-term partnerships with our suppliers.

We expect our contractors to follow the same principles of workplace safety, environmental responsibility, and respect for human rights, as set out in our Supplier Code of Conduct. Incorporating mandatory health and safety requirements into contractual arrangements, along with conducting due diligence on suppliers, helps ensure effective risk management and transparency across the entire supply chain.

The development of responsible supply chains is not just a challenge but a strategic opportunity to build a safe, environmentally focused, socially responsible, and competitive business capable of adapting to the evolving demands of today's global market".

Stanislav Seleznev,  
Vice President for Ecology and Industrial Safety at MMC Norilsk Nickel





# About the Nornickel Group

The Nornickel Group<sup>1</sup> (“Nornickel”, the “Group”, or the “Company”) is a leader in the Russian metals and mining industry, the world’s largest producer of palladium, and one of the leading global producers of nickel, platinum, copper, cobalt, and other metals. Nornickel is a vertically integrated holding company boasting a full production cycle – from ore mining to refining – along with its own energy, transportation, and support assets as well as research and development capabilities.

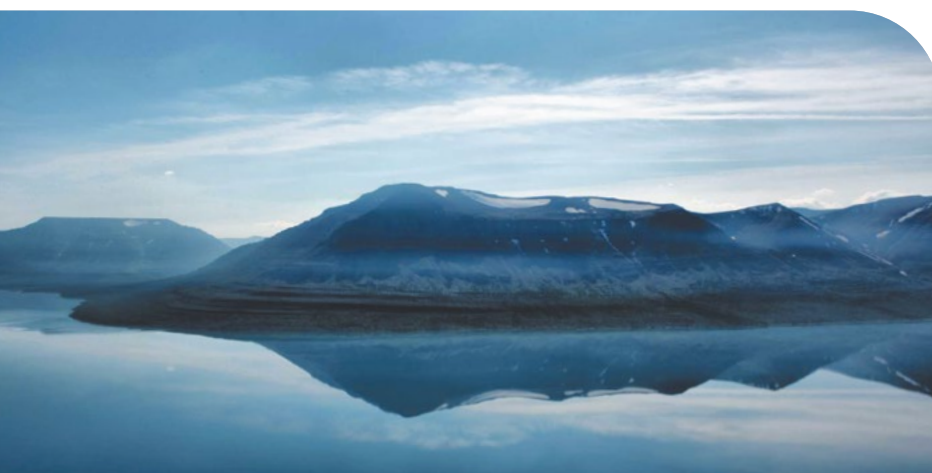
The Norilsk Nickel Group’s Responsible Supply Chain Report (the “Report”) covers the Company’s production assets located in Russia<sup>2</sup>.

Until **September 2024**, the organisational structure of the Company’s production assets in Russia included the following divisions: Norilsk, Kola, and Trans-Baikal.

In September 2024, two divisions – Norilsk and Kola, which comprised the Group’s core operating assets – were merged into the Polar Division to enhance Nornickel’s operational efficiency and financial stability, streamline internal processes, and break down organisational silos. The **updated organisational structure** of the Company’s production assets now includes the Polar and Trans-Baikal Divisions.

The production processes of each division are described in more detail in [MMC Norilsk Nickel’s 2024 Annual Report](#) and the [Norilsk Nickel Group’s 2024 Sustainability Report](#), as well as in the relevant sections of the Company’s corporate website.

# About the Report



Since 2008, Nornickel has kept its stakeholders<sup>3</sup> informed about the Group’s supplier selection processes and procurement practices through disclosures in its annual and sustainability reports.

Since 2023, the Company has published annual responsible supply chain reports disclosing its approach to managing relevant aspects and presenting the results of supplier assessments. These reports, along with accompanying brochures, are available in Russian and English on the Company website and addressed to a wide range of stakeholders.

<sup>1</sup> The Nornickel Group includes PJSC MMC Norilsk Nickel and its subsidiaries.

<sup>2</sup> The Report covers the Group’s Russian entities.

<sup>3</sup> Stakeholders are individuals, legal entities, groups, associations, and other organisations whose interests may be affected by the Company’s operations, as well as parties that may influence the Company.

## Responsible supply chain disclosure drivers

The Company takes a responsible approach to supply chain management and builds a transparent supplier engagement framework. In its approach to supply chain management, Nornickel is guided by PJSC MMC Norilsk Nickel’s Supplier Code of Conduct (the “Code”) and Responsible Sourcing Policy (the “Policy”), which take into account, among other things, the recommendations of the Guidance of the Organisation for Economic Co-operation and Development (the “OECD Guidance”)<sup>1</sup>. These documents formalise the Company’s commitment to ethical conduct and social and environmental responsibility. In disclosing information related to responsible supply chain, the Company is guided by national and international standards, customer expectations, and industry practices.

Nornickel advances its responsible supply chain practices in line with its mission to supply the world with non-ferrous metals, efficiently and safely using natural and financial resources. Notably, supply chain transparency is one of the targets set out in Nornickel’s Sustainable Social Development Strategy. Moreover, fostering sustainable engagement with suppliers not only aligns with the Group’s strategy but also strengthens the Company’s competitive position and enhances customer trust and loyalty towards its products.



“We consider responsible supply chains a strategic area that offers new opportunities to develop and enhance our internal processes. In today’s global economy, where sustainability and social responsibility performance are becoming essential measures of success, productive collaboration with partners who share our values is critical. By focusing on responsible supply chains, Nornickel is able to maintain its leadership while unlocking additional opportunities to increase transparency and strengthen partnerships.”

**Anton Berlin,**  
Vice President – Head of the Sales Division at MMC Norilsk Nickel

During the reporting period, Nornickel received a number of sustainability-related enquiries from its customers. Three quarters of these requests included questions about responsible supply chains, highlighting the importance of this topic within the overall framework of customer expectations and requirements.

## Report structure

The Report consists of two sections and contains information on Nornickel’s activities in responsible supply chain management regarding:

**mineral raw materials (Section 1)** – the section describes the Group’s mineral supply chain Due Diligence Management System and the supplier due diligence findings in 2024;



Mineral supplier due diligence is a process through which the Company assesses mineral suppliers for compliance with the OECD Guidance

**goods, works, and services (Section 2)** – the section describes Nornickel’s approach to the management of a responsible supply chain for goods, works, and services as well as the findings of a supplier sustainability assessment in 2024.



The sustainability survey of suppliers of goods, works, and services is used to assess their compliance with the requirements of the Code

<sup>1</sup> OECD Guidance means the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

# Approach to managing a responsible supply chain

Nornickel takes a responsible approach to working with both suppliers and customers, partnering only with those who comply with applicable laws and regulations, ensure safe working conditions for their employees, and meet the Company's environmental requirements.

Responsible supply chain management enables Nornickel to promote the sustainability agenda among its suppliers, encourage their compliance with the respective corporate standards set out in the Code and Policy, manage associated risks, and increase the level of mutual trust.

## The Group relies on a systemic approach to responsible supply chain management, which includes the following

**Monitoring of industry requirements and practices for a responsible supply chain** – looking into national requirements and international initiatives, potential risks and opportunities associated with them, and stakeholder expectations

**Supply chain analysis** – monitoring supplier activities and assessing their compliance with the Company's requirements set out in the Code and Policy

**Responsible supply chain disclosure** – publishing the findings following supplier due diligence and sustainability assessment

**Development of corporate documents and systems** – regulating responsible supply chain management and assessing suppliers for compliance with the requirements of the Company and a number of standards along with Russian and global best practices

**Supplier engagement** – managing a dialogue with suppliers, including through due diligence, assessment against sustainability criteria, development of action plans, and training on sustainability and responsible supply chain principles

**Environmental impact** is assessed throughout the life cycle of procured products: production, transportation, storage, use, and disposal. Nornickel requires its contractors to have a functioning environmental management system in place and

ensure that all goods and services supplied comply with the requirements of applicable environmental laws.

Given the potential negative environmental impact of cargo in transit, the master agreement with the Company's suppliers sets requirements for cargo packaging. Goods to be shipped must meet the cargo standards and requirements of GOST 26653-2015 Preparation of general cargoes for transportation and GOST 15846-2002 Production for transportation to the areas of the Far North and similar regions.

Packaging, labelling, transportation, and storage. Mandatory requirements are established for the transport containers and product packaging that should ensure cargo integrity during multiple transshipments and transportation to the Far North.

# Corporate responsible supply chain documents

In 2021, the Board of Directors approved the corporate documents describing the key principles of responsible supply chain management:

- [PJSC MMC Norilsk Nickel's Responsible Sourcing Policy](#), setting out Nornickel's approach to environmental, social, and corporate governance aspects throughout its supply chain;
- [PJSC MMC Norilsk Nickel's Supplier Code of Conduct](#), outlining the Company's approach to ensuring that its suppliers adhere to ethical sustainability principles.

The Policy is aimed at ensuring that suppliers meet the Company's sustainability criteria. It sets out Nornickel's responsible supply chain management principles applicable to both the Group and its suppliers.

The Code outlines the requirements and expectations for suppliers to conduct their activities in line with the Company's sustainability principles. As part of responsible supply chain management, Nornickel conducts supplier due diligence and assesses their compliance with the requirements of the Code. If a supplier fails to fully meet certain Code requirements, Nornickel identifies risks in the supply chain<sup>1</sup>. If the level of risk is not reduced following corrective actions, the relationship with the supplier may be reconsidered.

The Policy and the Code were communicated to stakeholders and published in Russian and English on the Company website.



<sup>1</sup> For a detailed description of risks, please see Subsection 1.2 ([Identification and Assessment of Mineral Supply Chain Risks](#)).



# Management of the responsible supply chain for minerals, goods, works, and services

As part of responsible supply chain management, the Group divides its suppliers into two categories.

## Mineral suppliers<sup>1</sup>

### Responsible mineral supply chain

✎ The System is described in more detail in [Section 1](#) of the Report.

The supply chain Due Diligence Management System (the “System”) sets out the procedure for conducting mineral supplier due diligence to identify risks related to the supply of minerals from conflict areas, human rights violations, money laundering, fraud, and corrupt practices.

In 2021, the System was rolled out at the Kola site of the Polar Division, and in 2022–2023, at entities at the Trans-Baikal Division and the Polar Division's Norilsk site.



The Company continuously improves the System by regularly updating and enhancing its due diligence tools to ensure a high level of transparency and efficiency in its supplier due diligence processes.

The System aims to ensure and monitor mineral suppliers’ compliance with Nornickel’s requirements set out in the Code and Policy and the applicable standards and initiatives.

The System places a particular focus on mitigating sustainability and operational risks in the supply chain – from working conditions to strengthening social stability in the regions, including areas where minerals are mined and processed.

<sup>1</sup> The Group’s mineral suppliers include suppliers of mined minerals (primary processed material which has never been previously refined) and suppliers providing minerals transportation, their processing and loading/unloading services.



## Suppliers of goods, works, and services<sup>1</sup>

### Responsible supply chain for goods, works, and services

✎ The approach to assessing suppliers of goods, works, and services against sustainability criteria is described in more detail in [Section 2](#) of the Report.

In 2023, the Company established its approach to assessing sustainability practices of suppliers of goods, works, and services, which is based on sustainability principles and supplier requirements described in the Policy and the Code.

Assessment envisages a survey and includes an analysis of the supplier operations’ ESG component.



The key purpose of the survey is to monitor the suppliers’ compliance with Nornickel’s corporate ESG standards set out in the Code and Policy.

<sup>1</sup> Suppliers of goods, works, and services include all of the Group’s supplier categories.



# Supplier engagement



Nornickel purchases over 40 aggregated procurement categories ranging from heavy industrial equipment to food.

The procurement procedures are set out in the Regulations on the Product Procurement Procedure for Nornickel Group Entities and in the local procurement regulations of the Group's entities.

Nornickel's procurement process is certified to ISO 9001 and ISO 14001.

## Cooperation with local manufacturers

One of the priority areas in supplier engagement is a focus on procurement from local manufacturers to provide social support for Nornickel's operating

regions. As a result, the volume of materials and services procured from local entities in 2024 increased as follows:

### in the Krasnoyarsk Territory

by 88% year-on-year

### in the Murmansk Region

by 108.6% year-on-year

### in the Trans-Baikal Territory

by 188.2% year-on-year

Engagement with local producers to support the sale of agricultural products helps create new jobs, modernise and strengthen the infrastructures of traditional sectors of the economy, and organise high-quality storage, processing, and distribution of products. This has a positive impact on the economic well-being of indigenous peoples of the North and encourages their pursuit of self-development and self-sufficiency. Such engagement provides a comprehensive approach to addressing sustainable development challenges across the region as a whole.



One of the Company's communication channels for [supplier engagement](#) is the Suppliers section on its website, which provides key information on procurement principles and procedures, planned procurement requirements, and announcements and invitations to participate in tenders.



In 2024, entities at the Trans-Baikal Division and the Polar Division's Norilsk site launched Telegram channels to promptly notify suppliers about upcoming procurements. These channels provide updates on the entities' needs for various materials and services.

## Supply agreements to include the responsible supply chain requirements

Nornickel expects its counterparties to comply with the sustainable development requirements that the Group itself adheres to. Standard forms of agreements and contracts, as well as the General Contracting Terms and Conditions, were amended to include a clause requiring compliance with the Company's sustainability requirements listed in the Code. This clause also informs suppliers about the opportunity to report to Nornickel's Corporate Trust Line, which is the Company's principal grievance mechanism<sup>1</sup>. In 2024, over 10 thousand agreements<sup>2</sup> were concluded using standard forms.

Nornickel's sustainable development requirements are set out in the Code and Policy and are covering the following:

- Human rights and labour relations;
- Environmental protection;
- Occupational health and safety;
- Anti-corruption.

To prevent corruption, supply agreements also include an anti-corruption clause to ensure that both parties are on the same page as regards zero tolerance for corruption. The clause establishes an obligation to promptly inform the other party of any potential corruption risks identified and relevant checks conducted as well as provides grounds for contract termination or other liability

if the counterparty violates the anti-corruption clause or is found to have engaged in unlawful activities.



## Procurement automation

Nornickel uses a single automated SAP SRM<sup>1</sup> electronic platform for supplier relationship management.

The SAP SRM platform is an efficient tool to handle centralised and decentralised procurement activities for the Group's entities.

For potential suppliers and partners, the platform offers access to online procurement information across all product categories. The system also enables users to generate and download procurement reports and other necessary documents, which greatly facilitates the document flow with suppliers.

SAP SRM access is free and requires no electronic signature to sign up and use the system. The Group relies on electronic workflow to streamline mutual settlements.

To raise market awareness and attract new suppliers, in 2024, SAP SRM was integrated with one of the top federal electronic trading platforms (as ranked by RAEX), which complies with the highest Russian and international standards for security and fault tolerance.

<sup>1</sup> SAP SRM means System Analysis Programme for Supplier Relationship Management.

<sup>1</sup> The Corporate Trust Line is described in more detail in the Corporate Trust Line subsection on [page 12](#).

<sup>2</sup> Agreements with suppliers of the Group's Russian assets.

Supplier risk identification

- Responsible supply chain management involves identifying supplier risks using<sup>1</sup>:
- responsible supply chain management procedures;
  - a mechanism (separate from responsible supply chain management) to check counterparties for reliability, solvency, and financial stability (“reliability check”).

Components of supplier risk identification



The reliability check is a part of the contracting procedure (beyond the System) applicable to the Group's potential suppliers. Thus, supply chain risk identification precedes the contracting procedure.

This check is aimed at confirming that the counterparty is reliable in terms of compliance with applicable laws and contractual obligations and is not exposed to any corruption risks. In addition to reviewing the supplier's registration, operational, and financial data, Nornickel analyses the information provided by the supplier and publicly available information about their business reputation, management, and business environment.

Based on the reliability check, the Company decides whether to cooperate with the respective counterparty going forward. Existing suppliers are also subject to a reliability check if more than 12 months have passed since the previous one.

The Company maintains a register of unreliable counterparties. Detailed information about the register, including the grounds for inclusion, the procedure for submitting appeals by listed parties, and the contact details of the employees responsible for maintaining the register, is available on Nornickel's website<sup>2</sup>.

Training on responsible supply chain

Training for suppliers

The Company focuses on raising its suppliers' awareness of sustainable development and the responsible supply chain. As part of supplier relationship management, the Company pays special attention to working meetings with suppliers' managers and employees to clarify Nornickel's responsible supply chain standards and requirements, as well as to explain the mineral supply chain due diligence process and the sustainability survey of suppliers of goods, works, and services.

Personnel training

In 2024, the Company launched a corporate training programme focused on Nornickel's sustainable development, which introduces key concepts of sustainability. The course also explains why Nornickel places particular emphasis on environmental protection, social responsibility, and corporate governance transparency and outlines the projects being implemented to support sustainable development. In 2024, over 17 thousand Nornickel employees were trained under the programme.

<sup>1</sup> Identification and assessment of risks associated with the mineral supply chain are described in more detail in the Assessment of Mineral Supply Chain Risks subsection on [page 19](#).

<sup>2</sup> The register of unreliable suppliers (in Russian) is described in more detail on the [Company website](#).



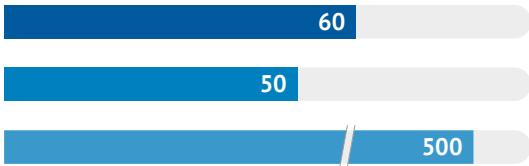
In addition to this educational initiative, during the reporting period, an extended online training course on responsible supply chain was developed and launched on the Nornickel Academy internal educational platform. The course covers various aspects of responsible supplier conduct, helps participants gain a deeper understanding of approaches and best practices for building responsible supply chains, and introduces internal documents and processes related to the responsible sourcing of minerals, goods, works, and services at Nornickel.



In 2024, Nornickel employees directly involved in conducting due diligence on mineral suppliers and assessing the sustainability performance of suppliers of goods, works, and services completed the responsible supply chain training course.

More than 18 thousand Group employees completed sustainability and responsible supply chain trainings in 2024

Participants by training area in 2024<sup>1</sup>



- In-depth responsible sourcing trainings
- Trainings on standards covering responsible sourcing matters
- General ESG training, including responsible sourcing sections

The year-on-year increase in the number of trained employees and total training hours in 2024 was driven by the launch of a sustainability training course, which was completed by over 17 thousand employees.

Received training in responsible supply chain, excluding those who completed the sustainability course

>600 people

The total number of training hours on responsible supply chain amounted to

>1.8 thousand

In 2025, the Company plans to engage a wider range of participants in responsible supply chain trainings.

Nornickel employees responsible for the implementation and oversight of responsible supply chain management procedures also regularly attend in-depth trainings on responsible supply chain. In 2024, Nornickel conducted a total of 15 trainings on responsible supply chain for managers and employees of entities at the Trans-Baikal Division and the Polar Division's Norilsk and Kola sites<sup>2</sup>.

<sup>1</sup> Excluding employees who completed the sustainability training course.

<sup>2</sup> The trainings also covered employees of internal mineral suppliers that are part of the Group.





## Corporate Trust Line

✉ The CTL procedure is described in more detail in Section XX of Nornickel's Sustainability Report.

In 2010, Nornickel set up its Corporate Trust Line (the "CTL") to provide the Group's managers with objective and reliable information about identified cases of abuse, theft, corruption, fraud, and other violations in a timely manner to support effective decision making. This enables timely and prompt response to identified issues and helps prevent their recurrence.

Stakeholders may also report any violations of law and the Company's internal policies to the CTL. Reports may be submitted anonymously and are handled in such a way as to ensure confidentiality, objectivity, and impartiality and to prevent retaliation against whistleblowers.

In addition, issues may be reported to the Corporate Trust Line using virtual assistants on the Nika and Supernika<sup>1</sup> platforms. This service is available to employees of the Group's entities.

Reports are handled in accordance with the Company's approved Procedure for the Corporate Trust Line. Report statistics are reviewed by the Board's Audit Committee and published in Nornickel's sustainability reports. CTL reports are also sent to the Group's entities.

In 2024, the CTL received 52 reports from contractor and subcontractor employees, classified under the Responsible Sourcing topic. This topic covers complaints and reports containing information about violations committed by employees of suppliers, contractors, and subcontractors working at the Company's facilities or providing services to the Group's entities. For all the reports containing confirmed violations, corrective actions were taken to remedy the situation and eliminate negative consequences.

### Issues may be reported via multiple channels:

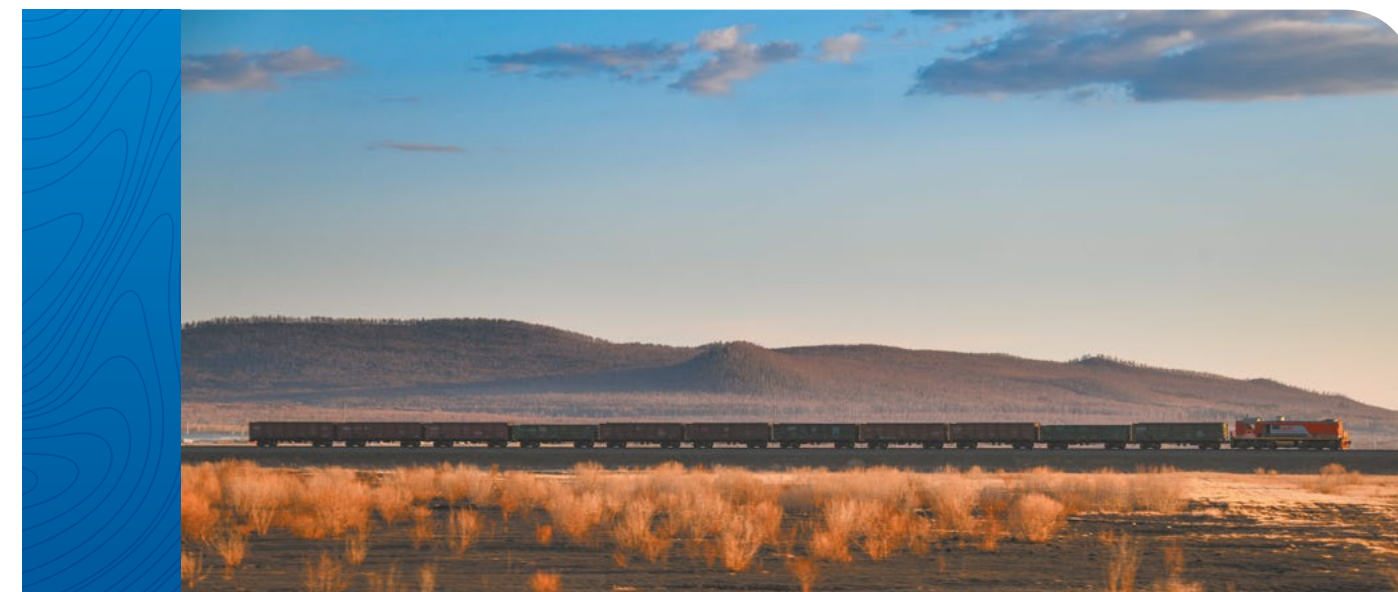
@ by e-mailing the corporate address [skd@nornik.ru](mailto:skd@nornik.ru)

🌐 by filling out a contact form on the CTL page of the Company website: <https://nornickel.com/sustainability/corporate-hotline/>

☎ by calling 8 (800) 700-19-41, 8 (800) 700-19-45

✉ by sending a letter to 1st Krasnogvardeysky Drive 15, Moscow, Russia, 123100, Corporate Trust Line

<sup>1</sup> Nika and Supernika are platforms aimed at creating a shared digital environment for Company employees, including a feedback feature.



## Summary of the Group's responsible supply chain results in 2024



The Company was named a finalist at the MINEX Forum's Russian Mining Excellence Awards in the Sustainability Project category for its initiative to develop a responsible supply chain management system at MMC Norilsk Nickel.



The implementation of the Company's Socially Sustainable Development Strategy, which aims to build transparency across the supply chain, is ongoing.



Due diligence checks were conducted on mineral suppliers of entities at the Polar Division's Norilsk and Kola sites, including internal suppliers that are part of the Group. No risks were identified in the supply chains following the due diligence process.



Entities at the Polar Division's Norilsk and Kola sites were assessed by an independent auditor for compliance with the RMI<sup>1</sup> JDDS<sup>2</sup> standard as well as the OECD Guidance.



An assessment was held for the sustainability practices of the largest suppliers of goods, works, and services for compliance with the Code requirements, showing a compliance rate of 48%.



A comprehensive online training course on responsible supply chain was launched on the Nornickel Academy internal educational platform.

<sup>1</sup> RMI – Responsible Minerals Initiative.

<sup>2</sup> JDDS – Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc.



# Section 1. Management of the responsible mineral supply chain

## 1.1. Mineral supply chain Due Diligence Management System

The System was developed in accordance with the following standards:

- [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#);
- [London Metal Exchange Red Flag Assessment Template](#);
- [Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc](#) (JDDS), developed by international copper, lead, and zinc associations, the Nickel Institute, and the Responsible Minerals Initiative;
- Pilot Cobalt Refiner Supply Chain Due Diligence Standard, developed jointly by the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCME), the [Responsible Cobalt Initiative](#) (RCI), and the [Responsible Minerals Initiative](#) (RMI);
- [Standard for Responsible Mining of the Initiative for Responsible Mining Assurance](#) (IRMA);
- [Performance Expectations of the International Council on Mining and Metals](#) (ICMM);

- [Due Diligence Guidelines for Responsible Mineral Supply Chains of the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters](#) (CCCME);
- The draft Consolidated Mining Standard developed by the [Consolidated Mining Standards Initiative](#) (CMSI), which integrates the requirements of the Copper Mark<sup>1</sup>, ICMM, the World Gold Council<sup>2</sup>, and the Mining Association of Canada<sup>3</sup>.

Nornickel annually reviews the System's performance and, when necessary, updates its standards and approaches based on the findings of due diligence and external assessments, updates to applicable standards, and best practices in sustainability and supply chain management.

The following flow chart illustrates how the System operates, showing the five steps of the due diligence process<sup>4</sup>.

Nornickel's mineral supply chain Due Diligence Management System under the OECD Five-Step Framework



<sup>1</sup> Copper Mark JDDS. For more details, please see [www.coppermark.org](http://www.coppermark.org).  
<sup>2</sup> For more details, please visit the official website of the World Gold Council [www.gold.org](http://www.gold.org).  
<sup>3</sup> For more details, please visit the official website of the Mining Association of Canada [www.mining.ca](http://www.mining.ca).  
<sup>4</sup> The System's methodology is based on the OECD Five-Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain.

<sup>1</sup> Conflict-Affected and High-Risk Areas.

## Management framework and responsible parties

In line with the Code, Policy, and the OECD Guidance, Nornickel has established a mineral supply chain due diligence management framework within the Group.

At the Head Office level, the Sustainable Development Department is responsible for the development, monitoring, and coordination of the System's implementation. Among other things, it is tasked with drafting and approving regulations governing supplier engagement<sup>1</sup>. This Department also provides necessary guidance on the System's operation to divisions.

At the divisional level, the System is implemented by the sustainability units of the Group's entities. Different steps of the System's implementation also involve the Head Office's and divisions' departments responsible for procurement, production, and safety, the Risk Management Service, as well as legal, corporate relations, marketing, and public relations departments.

The System underlies the internal mineral supplier due diligence standards (the "standards") developed at two entities at the Polar Division's Norilsk site, one at the Polar Division's Kola site, and one at the Trans-Baikal Division. These standards are aimed at ensuring responsible mineral supply chain management and the compliance with the OECD Guidance and LME's requirements. Each standard factors in divisional entities' specifics, governs interactions between business units, and defines the responsible parties and their responsibilities.

The employees in charge of managing the System are responsible for the following key tasks:

- Developing and aligning amendments to the Policy, Code, and other regulations and guidelines as part of the System;
- Organising and coordinating the implementation of the System, as well as monitoring and assessing its performance;
- Ensuring that employees involved in the mineral supply chain are familiar with the requirements of corporate documents and internal standards for responsible supply chains;

- Informing mineral suppliers about the Code requirements and providing consultations when necessary;
- Identifying and assessing supply chain risks and conducting due diligence on mineral suppliers in line with the divisional System standards;
- Developing risk management plans in cooperation with suppliers and overseeing their implementation;
- Preparing reports: internal reports on mineral supply chain due diligence for management, including performance assessment and risk management results, as well as public annual responsible supply chain reports<sup>2</sup>;
- Developing and providing training for employees involved in the operation of the System;
- Organising independent audits of mineral suppliers;
- Ensuring that Nornickel's products comply with the LME's responsible sourcing requirements.

If necessary, mineral supplier due diligence may involve a relevant unit or function of two entities at the Polar Division's Norilsk site, one at the Polar Division's Kola site, and one at the Trans-Baikal Division, depending on their area of activity. The responsible supply chain is discussed by the Sustainable Development and Climate Change Committee of the Company's Board of Directors.

## Mineral supply controls and transparency

Nornickel regularly monitors mineral flows throughout its supply chain and continuously improves mechanisms to ensure the transparency and quality of on-site material acceptance procedures. The System complements the existing supply chain controls by ensuring compliance with the OECD Guidance.

The Group's entities rely on their internal controls to monitor minerals flows from suppliers. Each of Nornickel's metals and mining assets has its own system for the acceptance and accounting of raw materials, ensuring control over their quality and quantity.

Mineral supply controls are run by production units and internal business units involved in material acceptance and processing. Material acceptance and verification of quality and quantity are conducted

to confirm that no conflicts exist under supply agreements and the applicable national regulations for the acceptance of consumer and non-consumer goods in terms of quality and quantity.

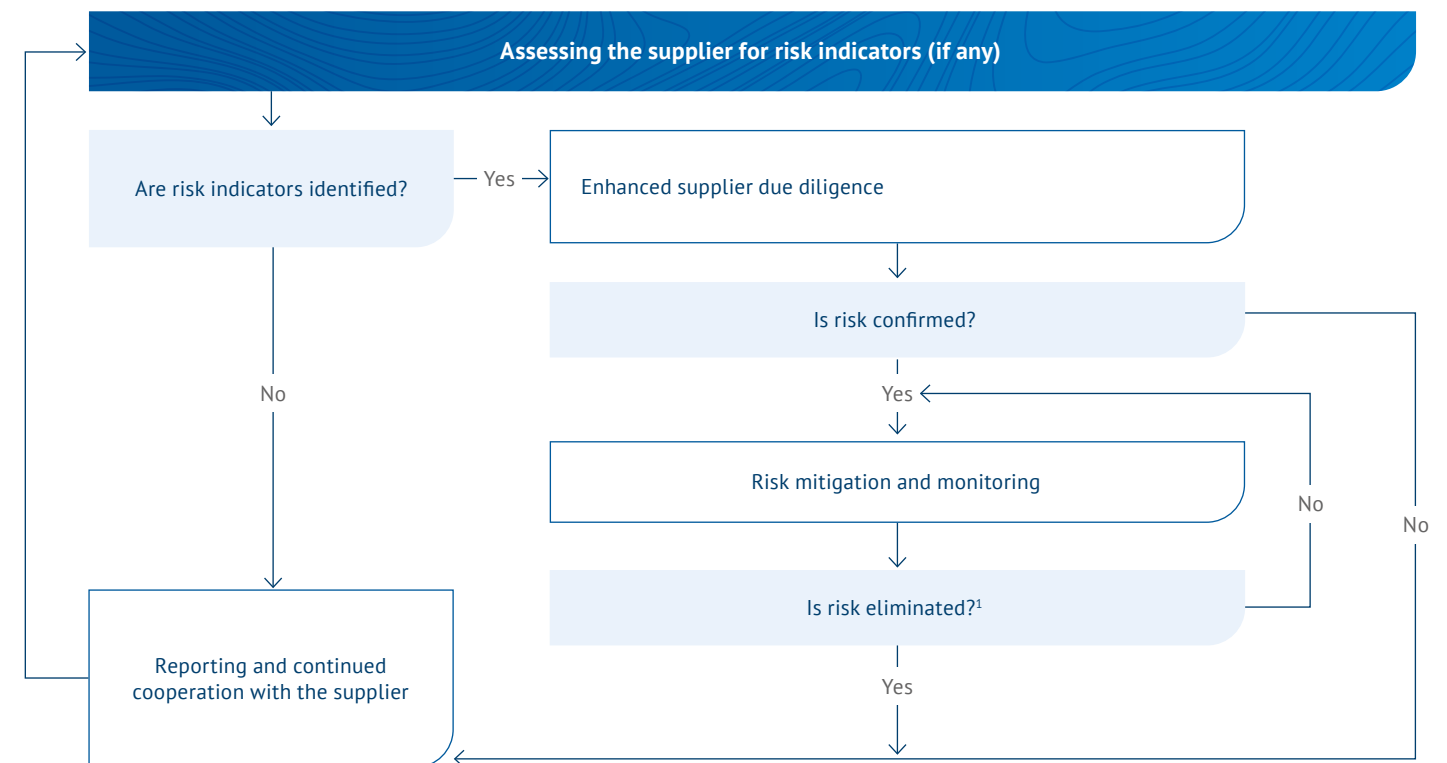
This verification covers suppliers' primary accounting documents as well as shipping documents.

All relevant documents and data related to the accounting and transportation of raw materials are retained by Nornickel for at least five years, in accordance with the applicable regulatory and procedural guidelines governing record keeping and archiving. Mineral supplier due diligence records are also stored in electronic files on the Company's servers.

## 1.2. Identification and assessment of mineral supply chain risks

The process of identifying mineral supply chain risks includes several steps.

The Group's overall mineral supply chain due diligence and risk management flow chart



<sup>1</sup> Regulations on engagement with mineral suppliers during supplier due diligence.

<sup>2</sup> All documents received from suppliers and generated by the Company are retained for at least five years.

<sup>1</sup> If a risk is identified and confirmed, the Company assesses its exposure and cooperates with the supplier to develop a risk mitigation plan. In some cases, if a confirmed risk is deemed unacceptable to the Group, cooperation with the supplier may be reconsidered.



The first step in mineral supplier due diligence is identifying risk indicators in the mineral supply chain. These indicators highlight potential risks associated with mineral extraction, transportation, and production. If the first step identifies risk indicators, the Company conducts enhanced due diligence of the supplier to identify and confirm risks (if any). If the risk is confirmed, the Company assesses its exposure and cooperates with the supplier to develop risk mitigants. Once these have been implemented, the Company decides whether to continue working with the supplier.

Each step of due diligence relies on the specifically designed tools described below.

### Identification of risk indicators in the mineral supply chain

Under the System, the key risk indicator relates to minerals originating from or being transported via a CAHRA area, those originating from a country that has limited known mineral reserves, as well as counterparties being financially or legally connected to supplies from a CAHRA area. The supplier's failure to formally accept the Code, or a set of submitted documents that does not allow for an assessment of the supplier's compliance with the Code, are also considered risk indicators.

#### Identification of risk indicators in the mineral supply chain



To identify risk indicators, Nornickel first identifies suppliers, the minerals supplied, and all the elements of the supply chain, and then assesses compliance with the Code.

To identify risk indicators, the Group uses the following tools:

- Know Your Supplier Questionnaire;
- Supplier Code of Conduct Compliance Questionnaire;
- Supply Chain Mapping Questionnaire;
- CAHRA Assessment Tool.

#### Know Your Supplier Questionnaire

To identify risk indicators, Nornickel distributes Know Your Supplier Questionnaires among its suppliers. In addition to collecting up-to-date information about the owners of mineral suppliers, the Know Your Supplier Questionnaire covers the following:

- Nature of the counterparty's core business and geography;
- Minerals supplied;
- Applicable licences (if any);
- Key sub-suppliers;
- Supply chain management approach.

#### Supplier Code of Conduct Compliance Questionnaire

As part of mineral supplier due diligence, Nornickel also assesses how well they comply with Nornickel's Code based on the completed Supplier Code of Conduct Compliance Questionnaire and a package of supporting documents confirming the degree of compliance.

The form is structured to incorporate the Code's requirements and determine the current status of the supplier's ESG practices, including as regards responsible supply chains. Based on the completed questionnaires, Nornickel gains a better understanding of its supply chain and helps promote ESG practices among suppliers.

#### Supply Chain Mapping Questionnaire

This tool is a form used to provide more details on the mineral supply chain, specifically the Group's direct suppliers and sub-suppliers. The form shows the existing mineral supply chain for the specific division entity with details on material sources broken down by supplier. The data collected through this Questionnaire help establish the number of suppliers, whether they are part of the Group,

the type, volume, and origin of minerals delivered in the selected period, as well as potential supplier risks under the OECD Guidance.

### The Questionnaire enables Nornickel to map the mineral supply chain in a holistic way and to identify inherent potential risks.

#### CAHRA Assessment Tool

The CAHRA Assessment Tool reviews more than 150 countries for corrupt practices, money laundering, political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure, widespread violence, human rights violations, and violations of national or international law. The tool uses 12 indices and indicators (including those recommended by the RMI) to determine whether a country is on the CAHRA list.

### Assessment of mineral supply chain risks

If risk indicators are identified, the Company performs enhanced risk-based due diligence on the supplier.

Nornickel's internal mineral supplier due diligence standards, developed in line with the OECD Guidance, determine the following potential risks that may arise in the supply chain:

- Serious human rights violations, including cruel, inhuman, or degrading treatment, any forms of torture and forced labour, the worst forms of child labour, other gross human rights violations, war crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide;
- Direct or indirect support to non-state armed groups;
- Direct or indirect support to security forces who illegally control, tax, or extort money or minerals at points of access to mine sites, along transportation routes, or at points where minerals are traded, as well as in favour of second- and higher tier mineral suppliers relative to Nornickel;
- Bribery and fraudulent misrepresentation of the origin of minerals;
- Money laundering;
- Non-payment of taxes, fees, and royalties to governments.

If a risk is identified and confirmed, the Company assesses its exposure and cooperates with the supplier to develop a risk mitigation plan. In some cases, if a confirmed risk is deemed unacceptable to the Group, the relationship with the supplier may be reconsidered.

Nornickel also conducts monitoring of those suppliers that were subject to an enhanced due diligence (due to risk indicators identified previously). This monitoring procedure includes gathering data on the suppliers' operations and conducting on-site audits (if necessary), including where minerals are actually mined, transported, and processed.

To perform enhanced due diligence, Nornickel has designed dedicated tools and procedures based on industry best practices and considering their applicability in the Russian Federation:

- Supplier Risk Assessment Tool;
- Gathering information from public sources;
- Third-party verifications and audits commissioned by the Company.

#### Supplier Risk Assessment Tool

An enhanced due diligence includes assessing the supplier for risk exposure (if any) and the level of risks. The System's risk-based approach relies on the risks identified under the OECD Guidance.

This assessment is conducted using a supply chain risk assessment tool, which contains a list of risks and corresponding assessment criteria used to determine the level of risk exposure. This procedure enables the Company to develop and implement the respective risk mitigants.

#### Gathering information from public sources

To obtain more detailed information about suppliers, the Company gathers and analyses data on their operations from public sources. To this end, the Company additionally studies audit reports and reports from public organisations and government agencies relating to suppliers' operations, as well as industry publications, news articles, and information from counterparties. In addition to reviewing documentary evidence, the Company also engages with representatives of local communities and organisations.

### Independent verification of suppliers

Nornickel may initiate independent verification involving third-parties to gain insight into how its suppliers actually mine, transport, process, and export minerals. Such audits seek to identify and assess adverse consequences arising from both potential and actual risks.

### Risk assessment frequency

Given the changing geopolitical landscape and the need to update its counterparty requirements in a timely manner, the Group conducts mineral supplier risk assessments, including checks on whether an area is on the CAHRA list, on an annual basis or whenever material changes occur in the supply chain.

Divisions are responsible for producing internal reports on mineral supply chain due diligence, including performance assessment and risk management results. The Sustainable Development Department at Nornickel's Head Office produces Group-level due diligence and monitoring reports.

### Supplier due diligence in 2024

Nornickel's mineral supply chain due diligence involves assessing any and all suppliers, whether internal or external<sup>1</sup>. The key distinctive feature of the Company's mineral supply chain is that most of its mineral suppliers are internal (part of the Group).

In 2024, due diligence checks were conducted on 12 mineral suppliers<sup>2</sup> of entities at the Polar Division's Norilsk and Kola sites, including four external suppliers. Among the external suppliers, two that underwent assessment were transportation service providers, one was a mining company, and one was engaged in processing (crushing) operations.

In 2024, mineral supplier due diligence identified no risk indicators or risks.

## 1.3. Management plan for mineral supply chain risks

### Action plan following risk confirmation and risk management strategy

At this step, responsible parties, including the management team, use the Risk Decision Matrix to decide whether to cooperate with the respective supplier going forward. The decision depends on the level of confirmed risk.

The next step is to develop a Risk Management Plan (the "Plan") should the risks be confirmed at the previous risk identification and assessment steps. The Plan is required for the supplier to eliminate the risks confirmed.

The risk management procedure and development of the Plan begin with notifying Nornickel's management of the risk confirmation following an enhanced due diligence.

Then, the Group develops the Plan in cooperation with suppliers and, where necessary, other stakeholders, such as representatives of local communities. The Plan should clearly specify the risk mitigation goals, timelines, and performance indicators, as well as the responsibilities of all the parties involved and possible corrective actions. The Plan needs to be approved by the Company's management.

Based on the level of risk exposure and the cooperation decision made, the responsible parties determine the response timelines and reporting procedures for management to follow up on the Plan, as well as develop a list of risk mitigants. Each risk mitigant implies specific actions to be taken and relies on the required internal resources. The Plan prioritises the most efficient solutions, taking into account suppliers' human, logistical, and financial resources.

The choice of an approach to developing the Plan depends on the risk exposure established during an enhanced due diligence and affects the deadlines for supplier notification and risk mitigation, the type (remote or in-person) and frequency of progress assessments, and whether Nornickel's internal resources are required.

The overall success of the Plan hinges on stakeholder engagement, which requires the mandatory involvement of the supplier's management throughout its implementation. Under the Plan, the supplier must submit progress reports to the responsible sustainability manager at Nornickel.

Where critical risks need to be addressed, suppliers must continuously report to the respective business units at divisions and, where necessary, to the Sustainable Development Department at Nornickel's Head Office, the Board of Directors, and the Management Board.

Upon the expiration of the deadlines set out in the Plan, Nornickel reviews the supplier's progress. If the supplier fails to achieve the approved targets, the Group may either continue cooperation, provided that a new risk management plan is developed, or reconsider its relationship with the supplier.

Since no confirmed risks were identified for mineral suppliers, the Company did not initiate the above action plan procedure in 2024.

In supply chain risk management, the System standards allow for the engagement of external stakeholders. The decision to involve them depends on the nature, severity, and specifics of the identified risks and is aimed at improving the effectiveness, adequacy, and measurability of relevant risk management measures.

<sup>1</sup> External suppliers are those that are not part of the Group.

<sup>2</sup> The Trans-Baikal Division entity did not conduct due diligence, as it has no mineral suppliers.



## 1.4. Independent audit of the mineral supply chain

The Company regularly undergoes independent industry verifications and assessments to ensure compliance with the OECD Guidance, enhance the System's efficiency, increase stakeholder confidence in Nornickel's supply chain, and assure its transparency.

In the first quarter of 2024, entities at the Polar Division's Norilsk and Kola sites<sup>1</sup> were assessed by an independent auditor for compliance with the RMI JDDS standard as well as the OECD Guidance. The assessment primarily covered aspects such as environmental protection, social impact, occupational health and safety as well as transparency in the responsible supply chain, including the origin and transit of minerals. The audit confirmed that the entities comply with the applicable standards. As of the end of 2024, most of the corrective actions under the plan were completed.

### Reporting to the London Metal Exchange

Every year, Nornickel submits Red Flag Assessment reports to the LME to confirm its compliance with the LME's responsible sourcing requirements. In the second quarter of 2024, the Company provided such reports for five LME-listed Nornickel metal brands, all of which were accepted by the LME.

### ISO certification

In addition to supply chain assessments, the Group's business units, including the Head Office and entities at the Polar Division's Norilsk and Kola sites, have their management systems certified under the following international standards<sup>2</sup>:

- ISO 9001:2015 Quality management systems;
- ISO 14001:2015 Environmental management systems;
- ISO 45001:2018 Occupational health and safety management systems.



## Section 2. Management of the responsible supply chain for goods, works, and services

### 2.1. Assessment of the suppliers' sustainability practices

An approach to assessing suppliers'<sup>1</sup> sustainability practices takes into account stakeholder expectations, standards, and regulatory recommendations, such as:

- queries from the Company's customers regarding a responsible supply chain;
- recommendations for public joint stock companies to disclose non-financial information regarding their operations, issued by the Bank of Russia, including recommendations on disclosures related to the management of a sustainable supply chain;
- A Guide for Issuers: How to Comply with Best Sustainability Practices, drafted by Moscow Exchange, including responsible supply chain management practices;
- draft Sustainability Reporting Standard of the Russian Ministry of Economic Development;
- RAEX ESG ranking covering responsible supply chains;

- [EcoVadis](#)<sup>2</sup> rating, which evaluates companies' practices in building a responsible supply chain;
- Standard for Responsible Mining ([Initiative for Responsible Mining Assurance](#), IRMA), which covers suppliers of goods, works, and services, among others;
- [International Financial Reporting Standards \(IFRS\) S1 and S2](#), developed by the [International Sustainability Standards Board](#) (ISSB), including requirements on supply chain transparency;
- the [Global Reporting Initiative](#) (GRI) standard that creates a sustainability reporting framework, including indicators on supplier relations and making supply chains more sustainable.

<sup>1</sup> Suppliers of goods, works, and services include all of the Group's supplier categories.

<sup>2</sup> EcoVadis is a platform for corporate social responsibility and sustainable procurement ratings.

<sup>1</sup> The entities are the Group's internal mineral suppliers.

<sup>2</sup> For more details on other compliance certificates of the management system, please visit the [Company website](#).



## 2.2. Approach to assessing the sustainability practices of suppliers of goods, works, and services

In 2023, the Company expanded the scope of suppliers subject to assessment for compliance with the Code requirements (the “assessment”) by including, in addition to mineral suppliers,

suppliers of goods, works, and services. Nornickel conducts the assessment using the Supplier Self-Assessment Questionnaire (the “Questionnaire”).



The Questionnaire serves as an important tool for building suppliers’ capacity in sustainable development and fostering open dialogue. Along with assessing the maturity of suppliers’ practices, it also promotes the sustainability agenda among suppliers by providing recommendations for further improvement.

### The assessment system was rolled out in phases:

#### 1. 2023 – pilot assessment:

- a pilot survey of a supplier sample<sup>1</sup> was conducted;
- feedback was analysed and the assessment methodology was initially refined.

#### 2024 – expansion of the assessment coverage:

- **the supplier sample size more than doubled<sup>2</sup>;**
- the wording of the Questionnaire was updated to better align with the Code requirements and reflect stakeholder demands customers, regulatory requirements, ESG ratings);
- additional questions were included in the Questionnaire to account for the industry-specific context of suppliers;
- questions were expanded to verify not only the availability of regulatory documents but also their practical implementation.

<sup>1</sup> The largest external suppliers of the Group’s Russian assets in terms of payment amounts in 2022.

<sup>2</sup> In 2023, the survey covered 14% of the Group’s total procurement volume; in 2024, more than 35%.

## 2.3. Methodology for assessing the suppliers’ sustainability practices

### The Questionnaire comprises three key sections

**E**

#### Environmental

environmental protection, waste management, climate policy

**S**

#### Social

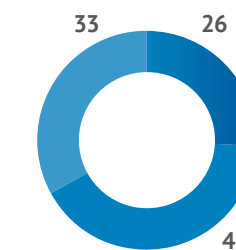
occupational health and safety, human rights

**G**

#### Governance

corporate governance, anti-corruption, process transparency

### Structure of the Supplier Self-Assessment Questionnaire, %



■ Environmental  
■ Social  
■ Governance

The assessment of suppliers begins with the completion of a questionnaire covering sustainability-related topics. Responses are analysed for the quality of data provided, and additional supporting documents<sup>1</sup> may be requested where necessary. Based on the maturity of the supplier’s practices, each question is scored, and a weighted average is then calculated for each section: environmental, social, and governance. To reflect the supplier’s industry profile, the scores are adjusted using appropriate factors to produce a final assessment of the maturity of the supplier’s sustainability practices. Where needed, suppliers are offered consultations to help implement the recommended improvements and enhance the effectiveness of their management processes – ultimately strengthening their competitiveness and business resilience.

### The Company provides comprehensive support to suppliers by:

- clarifying assessment requirements and methodology, including through consultation calls;
- assisting with the preparation of required documents;
- offering recommendations to improve sustainability practices.

The Company welcomes a proactive approach from suppliers and strives to make the assessment process transparent and user-friendly.

<sup>1</sup> All documents received from suppliers and generated by the Company are retained for at least five years.

<sup>2</sup> Expenditure contracts with mutual obligations.



In the second half of 2025, Nornickel plans to conduct another assessment of a sample of suppliers of goods, works, and services.



The sample will include external suppliers (i.e. those not part of the Group) that had valid contracts with the Group in 2024<sup>2</sup>. The Company conducts the assessment by sending the Questionnaire to the suppliers included in the sample.

Suppliers may also volunteer to participate in the survey by sending a request to [social\\_report@nornik.ru](mailto:social_report@nornik.ru).



The subject line of the e-mail should read “Responsible Supply Chain Supplier”, and the message should include the supplier’s name, INN (taxpayer identification number), and details of contracts with the Group that were active in 2024. Upon receipt of the request, the supplier will be checked for compliance with the sampling criteria, and if compliance is confirmed, a Questionnaire will be sent to them.



2.4. Assessment of the suppliers’ sustainability practices: results

In 2024, Nornickel assessed a sample of its largest suppliers of goods, works, and services, accounting for

>35%

of the Group’s total procurement volume

A total of

94%

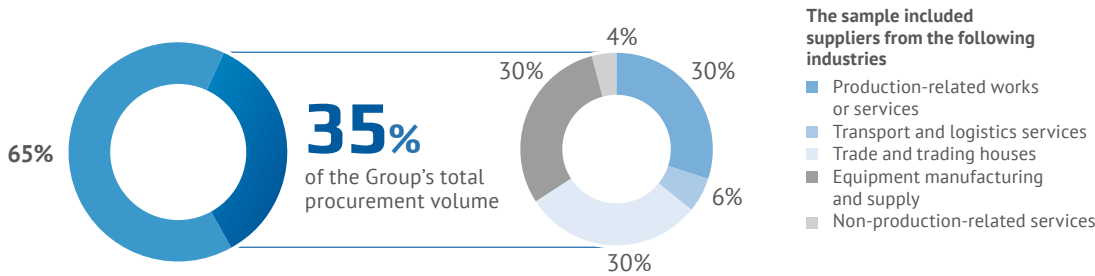
of sample suppliers participated in the survey

Based on the results of the 2024 assessment, the overall compliance rate of the suppliers’ sustainability practices with the Code requirements as set out in the Questionnaire was

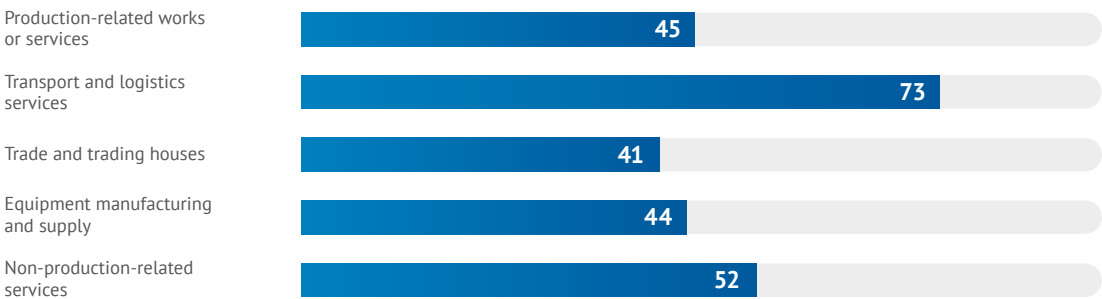
48%<sup>1</sup>

<sup>1</sup> In 2023, the overall compliance rate of the suppliers’ sustainability practices was 68%. It is important to note that the results of the 2023 and 2024 surveys are not fully comparable, as the composition of the supplier sample changes from year to year. In addition, the 2024 sample size more than doubled (from 14% of total suppliers in 2023 to 35% in 2024), and both the Questionnaire and the assessment methodology were updated, which influenced trends in certain metrics.

<sup>2</sup> Peer companies from the 2023 and 2024 samples.



Maturity assessment of sustainability practices by industry, %



Overall sustainability maturity assessment of the supplier sample, %



During the reporting period, the supplier sample included companies that had also participated in the 2023 survey<sup>2</sup>. As a result of the follow-up assessment conducted a year later, changes were observed in the evolution of these suppliers’ sustainability agendas. In particular, environmental performance metrics improved, while scores for the social and governance dimensions saw a slight dip. These trends were driven by changes in the assessment methodology and updates to the Questionnaire, which placed greater emphasis on the actual sustainability practices implemented by suppliers rather than simply verifying the existence of formal policies and codes.

Most of the suppliers surveyed during the reporting period are privately held companies, and therefore the regulatory requirements and stakeholder expectations regarding their non-financial reporting are lower compared to public companies. However, despite the absence of mandatory requirements, the survey results indicate a sufficient level of maturity in the suppliers’ sustainability practices, taking into account their non-public status.

2.5. Plans for further engagement with suppliers of goods, works, and services

Going forward, Nornickel plans to further develop the Questionnaire by refining its structure and questions based on the results of the annual supplier assessment and stakeholder expectations. Next year, the Company plans to conduct another supplier assessment and explore mechanisms that increase supplier engagement in sustainability matters. In addition, Nornickel will continue

to advance educational initiatives aimed at raising supplier awareness of the sustainability agenda and responsible supply chain requirements. Expanded information and methodological support will help suppliers better understand and apply sustainability principles in their operations, promoting transparency and enhancing their own practices.



# Standards compliance index



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<sup>1</sup> Chapter 3.4: Mining and CAHRA of the Standard for Responsible Mining of the Initiative for Responsible Mining Assurance.



Report section	OECD Guidance	CCCMC Guidelines	IRMA	Page	Comments
Management framework and responsible parties	Describe the supply chain due diligence management framework	7.1.2. Structure internal management to support supply chain due diligence	3.4.3.2. Assessments to follow a recognised risk assessment methodology and to be carried out by competent professionals  3.4.2.2. Company's approach to human rights, maintaining documentation on minerals, assigning responsible parties, managing the grievance mechanism  3.4.3.3. Assessments to be based on credible evidence  3.4.6.1. Reporting to senior management	18	Nornickel has the Human Rights Policy of MMC Norilsk Nickel available on the Company website at <a href="https://nornickel.com/sustainability/social-responsibility/human-rights/">https://nornickel.com/sustainability/social-responsibility/human-rights/</a>
Mineral supply controls and transparency	Describe the control system over the supply chain and the recordkeeping system	7.1.3. Establish a system of controls and transparency over the mineral supply chain	3.4.3.3. Assessments to be based on credible evidence	20	
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Report section	OECD Guidance	CCCMC Guidelines	IRMA	Page	Comments
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Risk assessment frequency	–	7.3.1. Report findings of the supply chain risk assessment to the designated senior management of the company	3.4.3.4. Risk assessments to be updated regularly  3.4.6.1. Reporting to senior management	24	
Supplier due diligence in 2024	Publish the results of risk assessments	–	3.4.4.3. Adhere to the IRMA corporate social responsibility requirements if risks to human rights are identified	25	No human rights risks confirmed in the reporting period
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1.4. Independent audit of the mineral supply chain	Independent third-party audits	7.4. Carry out independent third-party audit at identified points in the supply chain	–	26	
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# Abbreviations

CAHRA	Conflict-Affected and High-Risk Areas
CCCMC	<a href="#">China Chamber of Commerce of Metals, Minerals &amp; Chemicals Importers &amp; Exporters' Due Diligence Guidelines for Responsible Mineral Supply Chains</a>  The guidelines of the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters regarding the due diligence process for responsible mineral supply chains
Code	<a href="#">PJSC MMC Norilsk Nickel's Supplier Code of Conduct</a>
CTL	Corporate Trust Line
EcoVadis	A platform for corporate social responsibility and sustainable procurement ratings
EITI	Extractive Industries Transparency Initiative
ESG	Environmental, social, and governance
GOST	State standard (of Russia)
GRI	<a href="#">Global Reporting Initiative</a>
Head Office	PJSC MMC Norilsk Nickel's Head Office
IFRS	International Financial Reporting Standards
IRMA	<a href="#">Initiative for Responsible Mining Assurance</a>
ISO	<a href="#">International Organization for Standardization</a>
ISSB	<a href="#">International Sustainability Standards Board</a>
JDDS	<a href="#">Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc</a>
LME	<a href="#">London Metal Exchange</a>
Minerals	Mineral raw materials containing nickel, cobalt, and copper
MMC	Metals and mining company



OECD	<a href="#">↗ Organisation for Economic Co-operation and Development</a>
OECD Five-Step Framework	<a href="#">↗ OECD Guidance Five-Step Framework for Risk-Based Due Diligence for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas</a>
OECD Guidance	<a href="#">↗ OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas</a>
PJSC	Public joint stock company
Plan	Risk Management Plan
Policy	<a href="#">↗ PJSC MMC Norilsk Nickel's Responsible Sourcing Policy</a>
Questionnaire	Supplier Self-Assessment Questionnaire
RAEX	Russia's largest credit rating agency, which publishes an ESG ranking of companies covering the responsible supply chain
Report	The Norilsk Nickel Group's Responsible Supply Chain Report
RMI	<a href="#">↗ Responsible Minerals Initiative</a>
SAP SRM	System Analysis Programme for Supplier Relationship Management
System	Mineral supply chain Due Diligence Management System

# Disclaimer

The information contained herein relies on the data available to PJSC MMC NORILSK NICKEL (the “Company”) as at the date of this 2024 Responsible Supply Chain Report (the “Report”). After this Report was prepared, the Company's operations as well as forecasts and overview of the current situation presented in the Report may have been affected by external or other factors, including the escalation of the geopolitical conflict in Ukraine, sanctions imposed by the United States, the European Union, the United Kingdom, and other nations against the Russian Federation as well as Russian individuals and legal entities, the Russian Federation's response to sanctions, economic and other measures introduced to maintain the economic and financial stability of the Russian Federation, and other factors beyond the Company’s control.

The Report discloses the Company's short-, medium-, and long-term goals and plans. All plans and intentions outlined in this Report are provisional and subject, among other things, to a number of economic, political, and legal factors, including the factors mentioned above, beyond Nornickel's control. Forward-looking statements are subject to risks and uncertainties as they refer to events and depend on circumstances that may or may not occur in the future. Forward-looking statements are not guarantees of the Company's future operational and financial performance, and actual results of the Company’s operations, its financial position, liquidity, prospects, growth, strategy,

and the development of the industry in which the Company operates may differ materially from those expressed or implied by the forward-looking statements contained in this Report. The Company hereby disclaims any liability for any loss resulting from the use of this Report, and assumes no obligation to update any forward-looking statements contained herein.

Statements regarding the industry in which MMC Norilsk Nickel operates as well as the Company's position relative to its competitors are based on publicly available information published by other metals and mining companies or obtained from trade and business organisations and associations. Such data and statements have not been verified by independent experts, and the financial and operating performance metrics of the Company's competitors used to assess and compare positions may have been calculated differently from the method used by MMC Norilsk Nickel.

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