



Contents

About the Nor Nickel Group	2	Section 1. Management of the responsible mineral supply chain	14
About the Report	2	1.1. Mineral supply chain Due Diligence Management System.....	14
Approach to managing a responsible supply chain	4	1.2. Identification and assessment of mineral supply chain risks.....	17
Corporate responsible supply chain documents	5	1.3. Management plan for mineral supply chain risks.....	21
Management of the responsible supply chain for minerals, goods, works, and services	6	1.4. Independent audit of the mineral supply chain.....	22
Mineral suppliers.....	6	Section 2. Management of the responsible supply chain for goods, works, and services	23
Suppliers of goods, works, and services.....	7	2.1. Assessment of the suppliers' sustainability practices.....	23
Supplier engagement	8	2.2. Approach to assessing the sustainability practices of suppliers of goods, works, and services.....	24
Procurement automation.....	8	2.3. Methodology for assessing the suppliers' sustainability practices.....	25
Supply agreements to include the responsible supply chain requirements.....	9	2.4. Assessment of the suppliers' sustainability practices: results.....	26
Supplier risk identification.....	10	2.5. Plans for further engagement with suppliers of goods, works, and services.....	27
Training on responsible supply chain.....	10	Standards compliance index	28
Corporate Trust Line.....	12	Abbreviations	33
Summary of the Group's responsible supply chain results in 2024	13	Disclaimer	35

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

RECOMMENDED FOR APPROVAL
by the Sustainable Development and Climate
Change Committee
of MMC Norilsk Nickel's Board of Directors
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APPROVED
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 Nornickel, 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 Group¹ (“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.

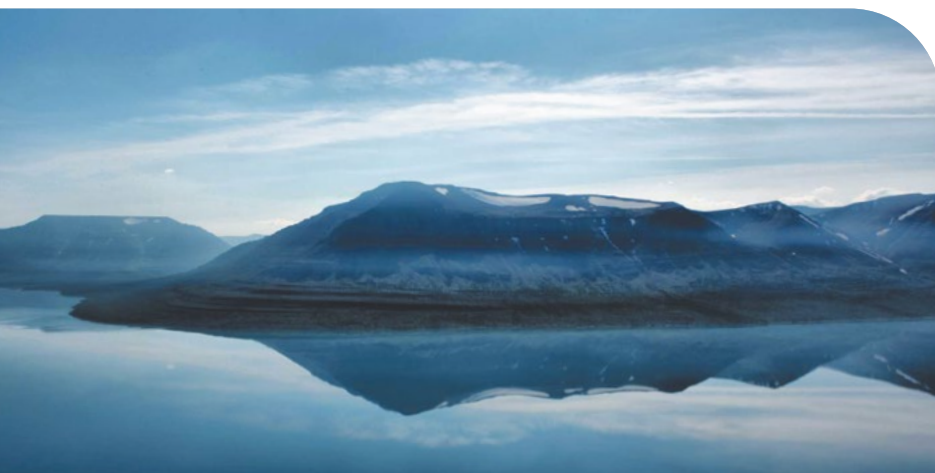
The Norilsk Nickel Group’s Responsible Supply Chain Report (the “Report”) covers the Company’s production assets located in Russia².

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 stakeholders³ 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.

¹ The Nornickel Group includes PJSC MMC Norilsk Nickel and its subsidiaries.

² The Report covers the Group’s Russian entities.

³ 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”)¹. 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

¹ 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.