

Supplier risk identification

- Responsible supply chain management involves identifying supplier risks using¹:
- 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 website².

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.

¹ 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](#).

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



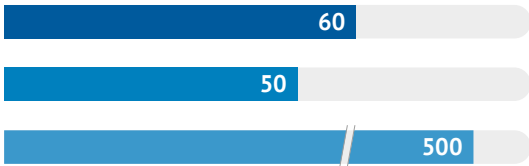
In addition to this educational initiative, during the reporting period, an extended online training course on responsible supply chain was developed and launched on the Nornickel Academy internal educational platform. The course covers various aspects of responsible supplier conduct, helps participants 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 2024¹



- 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 sites².

¹ Excluding employees who completed the sustainability training course.

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