



## 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.