

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 suppliers¹

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.

¹ 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 services¹

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.

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