

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 sample¹ was conducted;
- feedback was analysed and the assessment methodology was initially refined.

2024 – expansion of the assessment coverage:

- **the supplier sample size more than doubled²;**
- 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.

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

² 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

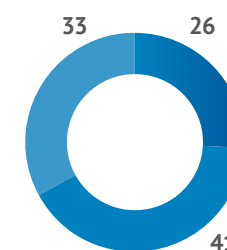
occupational health and safety, human rights

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 documents¹ 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.

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

² 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 2024². 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.



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.