

## 1.4. Independent audit of the mineral supply chain

The Company regularly undergoes independent industry verifications and assessments to ensure compliance with the OECD Guidance, enhance the System's efficiency, increase stakeholder confidence in Nornickel's supply chain, and assure its transparency.

In the first quarter of 2024, entities at the Polar Division's Norilsk and Kola sites<sup>1</sup> were assessed by an independent auditor for compliance with the RMI JDDS standard as well as the OECD Guidance. The assessment primarily covered aspects such as environmental protection, social impact, occupational health and safety as well as transparency in the responsible supply chain, including the origin and transit of minerals. The audit confirmed that the entities comply with the applicable standards. As of the end of 2024, most of the corrective actions under the plan were completed.

### Reporting to the London Metal Exchange

Every year, Nornickel submits Red Flag Assessment reports to the LME to confirm its compliance with the LME's responsible sourcing requirements. In the second quarter of 2024, the Company provided such reports for five LME-listed Nornickel metal brands, all of which were accepted by the LME.

### ISO certification

In addition to supply chain assessments, the Group's business units, including the Head Office and entities at the Polar Division's Norilsk and Kola sites, have their management systems certified under the following international standards<sup>2</sup>:

- ISO 9001:2015 Quality management systems;
- ISO 14001:2015 Environmental management systems;
- ISO 45001:2018 Occupational health and safety management systems.



## Section 2. Management of the responsible supply chain for goods, works, and services

### 2.1. Assessment of the suppliers' sustainability practices

An approach to assessing suppliers'<sup>1</sup> sustainability practices takes into account stakeholder expectations, standards, and regulatory recommendations, such as:

- queries from the Company's customers regarding a responsible supply chain;
- recommendations for public joint stock companies to disclose non-financial information regarding their operations, issued by the Bank of Russia, including recommendations on disclosures related to the management of a sustainable supply chain;
- A Guide for Issuers: How to Comply with Best Sustainability Practices, drafted by Moscow Exchange, including responsible supply chain management practices;
- draft Sustainability Reporting Standard of the Russian Ministry of Economic Development;
- RAEX ESG ranking covering responsible supply chains;

- [EcoVadis](#)<sup>2</sup> rating, which evaluates companies' practices in building a responsible supply chain;
- Standard for Responsible Mining ([Initiative for Responsible Mining Assurance](#), IRMA), which covers suppliers of goods, works, and services, among others;
- [International Financial Reporting Standards \(IFRS\) S1 and S2](#), developed by the [International Sustainability Standards Board](#) (ISSB), including requirements on supply chain transparency;
- the [Global Reporting Initiative](#) (GRI) standard that creates a sustainability reporting framework, including indicators on supplier relations and making supply chains more sustainable.

<sup>1</sup> Suppliers of goods, works, and services include all of the Group's supplier categories.

<sup>2</sup> EcoVadis is a platform for corporate social responsibility and sustainable procurement ratings.

<sup>1</sup> The entities are the Group's internal mineral suppliers.

<sup>2</sup> For more details on other compliance certificates of the management system, please visit the [Company website](#).