

Standards compliance index



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| About the Nornickel Group | – | – | – | 5 | |
| About the Report | Describe the methods for disclosing supplier information to supply chain participants Report annually on supply chain due diligence | 7.5. Report on process and results of supply chain risk management | 3.4.6.2. Annual public reports | 5 | All Extractive Industries Transparency Initiative (EITI) required data disclosed in the Company's annual reports |
| Approach to managing a responsible supply chain | – | – | – | 7 | Nornickel developed and deployed its own risk assessment system containing the steps recommended by the OECD Guidance and the IRMA |
| Corporate responsible supply chain documents | Describe the supply chain management policy | 7.1.1. Adopt and communicate the company's responsible sourcing policy to suppliers and the public | – | 8 | |
| Management of the responsible supply chain for minerals, goods, works, and services | – | – | – | 9 | |
| Supplier engagement | Provide information on capability training for affected stakeholders | 7.1.4. A supply chain policy to be incorporated into contracts and/or agreements with suppliers | – | 10 | |
| Procurement automation | – | – | – | 11 | |
| Supply agreements to include the responsible supply chain requirements | – | – | – | 11 | |
| Supplier risk identification | – | – | – | 12 | |

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| Training on responsible supply chain | Provide information on capability training for affected stakeholders | – | – | 13 | |
| Corporate Trust Line | – | 7.1.5. Establish a grievance mechanism | 3.4.2.2. Company approach to human rights, maintaining documentation on minerals, assigning responsible parties, managing the grievance mechanism | 14 | |
| Summary of responsible supply chain results in 2024 | – | – | – | 15 | |
| Section 1. Management of the responsible mineral supply chain | – | – | – | 16 | |
| 1.1. Mineral supply chain Due Diligence Management System | – | – | – | 16 | |

¹ Chapter 3.4: Mining and CAHRA of the Standard for Responsible Mining of the Initiative for Responsible Mining Assurance.

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| Management framework and responsible parties | Describe the supply chain due diligence management framework | 7.1.2. Structure internal management to support supply chain due diligence | 3.4.3.2. Assessments to follow a recognised risk assessment methodology and to be carried out by competent professionals 3.4.2.2. Company's approach to human rights, maintaining documentation on minerals, assigning responsible parties, managing the grievance mechanism 3.4.3.3. Assessments to be based on credible evidence 3.4.6.1. Reporting to senior management | 18 | Nornickel has the Human Rights Policy of MMC Norilsk Nickel available on the Company website at https://nornickel.com/sustainability/social-responsibility/human-rights/ |
| Mineral supply controls and transparency | Describe the control system over the supply chain and the recordkeeping system | 7.1.3. Establish a system of controls and transparency over the mineral supply chain | 3.4.3.3. Assessments to be based on credible evidence | 20 | |
| 1.2. Identification and assessment of mineral supply chain risks | – | – | – | 20 | |
| Identification of risk indicators in the mineral supply chain | Describe the risk assessment methodology | 7.2.1. Engage with suppliers to identify risks and confirm basic source information of materials 7.2.2. Undertake enhanced due diligence to identify risks in the supply chain 7.2.3. Assess risks of adverse impacts under the CCCMC Guidelines 7.3.4. Undertake additional risk assessments for risks requiring mitigation, or after a change of circumstances | 3.4.1.1. Conduct analysis to determine whether an area is on the CAHRA list 3.4.2.1. Respect for human rights 3.4.3.1. Assess the risks, their roots and whether they may lead to infringement of human rights 3.4.3.4. Risk assessments to be updated regularly | 21 | Nornickel does not operate in CAHRA, but performs enhanced supplier due diligence if it identifies risk indicators associated with CAHRA |

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| Assessment of mineral supply chain risks | Describe the risk assessment methodology | – | 3.4.1.2. Undertake the additional due diligence steps if an area is on the CAHRA list 3.4.3.1. Assess the risks, their roots and whether they may lead to infringement of human rights | 23 | |
| Risk assessment frequency | – | 7.3.1. Report findings of the supply chain risk assessment to the designated senior management of the company | 3.4.3.4. Risk assessments to be updated regularly 3.4.6.1. Reporting to senior management | 24 | |
| Supplier due diligence in 2024 | Publish the results of risk assessments | – | 3.4.4.3. Adhere to the IRMA corporate social responsibility requirements if risks to human rights are identified | 25 | No human rights risks confirmed in the reporting period |
| 1.3. Management plan for mineral supply chain risks | – | – | – | 25 | |
| Action plan following risk confirmation and risk management strategy | Describe the steps taken to manage risks Describe the risk management strategy Describe the efforts made to monitor and track performance of risk management | 7.3.2. Devise a risk management plan and choose a strategy 7.3.3. Introduce a risk management plan | 3.4.4.1. Develop and implement a risk management plan 3.4.4.2. Collaborate with relevant stakeholders to develop risk mitigants 3.4.5.1. Monitor the effectiveness of the risk management plan 3.4.5.2. Cease operations, mitigate the impact, and monitor due diligence activities in case of human rights violations | 25 | In the reporting period, the Company had no interaction with representatives of local communities as part of risk management plans development due to the absence of confirmed risks related to mineral suppliers |
| 1.4. Independent audit of the mineral supply chain | Independent third-party audits | 7.4. Carry out independent third-party audit at identified points in the supply chain | – | 26 | |
| Section 2. Management of the responsible supply chain for goods, works, and services | – | – | – | 27 | |

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| 2.2. Approach to assessing the sustainability practices of suppliers of goods, works, and services | – | – | – | 28 | |
| 2.3. Methodology for assessing the suppliers' sustainability practices | – | – | – | 29 | |
| 2.4. Assessment of the suppliers' sustainability practices: results | – | – | – | 30 | |
| 2.5. Plans for further engagement with suppliers of goods, works, and services | – | – | – | 33 | |

Abbreviations

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| CAHRA | Conflict-Affected and High-Risk Areas |
| CCCMC | China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters' Due Diligence Guidelines for Responsible Mineral Supply Chains The guidelines of the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters regarding the due diligence process for responsible mineral supply chains |
| Code | PJSC MMC Norilsk Nickel's Supplier Code of Conduct |
| CTL | Corporate Trust Line |
| EcoVadis | A platform for corporate social responsibility and sustainable procurement ratings |
| EITI | Extractive Industries Transparency Initiative |
| ESG | Environmental, social, and governance |
| GOST | State standard (of Russia) |
| GRI | Global Reporting Initiative |
| Head Office | PJSC MMC Norilsk Nickel's Head Office |
| IFRS | International Financial Reporting Standards |
| IRMA | Initiative for Responsible Mining Assurance |
| ISO | International Organization for Standardization |
| ISSB | International Sustainability Standards Board |
| JDDS | Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc |
| LME | London Metal Exchange |
| Minerals | Mineral raw materials containing nickel, cobalt, and copper |
| MMC | Metals and mining company |