

08 Responsible business conduct



Respect for human rights

GRI 2-23 / SASB EM-MM-210a.3 / TNFD Gc

GRI 14.25.2, 14.25.3, 14.25.4

Nornickel has a longstanding reputation as a responsible employer and a reliable partner for all stakeholders. It upholds high standards of responsible business conduct and respects the rights of every person involved in its operations.

The Company has zero tolerance for any form of discrimination as well as the use of forced or child labour, and ensures equal opportunities for all employees to exercise their labour rights. Nornickel does not operate in, nor does it source raw materials from, conflict-affected or high human rights risk areas.

Respect for human rights is an integral part of the Company's sustainability commitment. Nornickel consistently enhances its relevant practices, evaluates the results achieved, and analyses progress to drive further development. All up-to-date information about the initiatives implemented and results achieved in this area are available on the [human rights page](#) and in the [public reports on human rights on the Company website](#).

Nornickel's commitment to human rights

In its activities, Nornickel places particular emphasis on the human rights it considers a priority. The Company's approaches, principles, and commitments in this area are set out in its internal documents.



The right to life, liberty, privacy, and the security of person as well as freedom of movement



Right to occupational health and safety



Right to protection from discrimination



Rights to the protection of family, motherhood, and childhood



Right to a reasonable limitation of working hours and paid leave



Right to a healthy environment



[PJSC MMC Norilsk nickel's Business Ethics Code](#)



[PJSC MMC Norilsk Nickel's Occupational Health and Safety Policy](#)



[PJSC MMC Norilsk Nickel's Freedom of Association Policy](#)



[PJSC MMC Norilsk Nickel's Human Rights Policy](#)



[PJSC MMC Norilsk Nickel's Personal Data Processing Policy](#)



[PJSC MMC Norilsk Nickel's Policy Regarding Support for Small and Medium Enterprises](#)



[Equal Opportunities Programme](#)



[Working Conditions Policy](#)



Right to freedom of association and collective bargaining



Rights to work, just and favourable remuneration, favourable working conditions, and social security



Rights of local and indigenous communities



A requirement for counterparties to respect human rights as part of supply chain responsibility commitments



[PJSC MMC Norilsk Nickel's Community Engagement Policy](#)



[Policy of Engagement with Indigenous Small-Numbered Peoples](#)



[PJSC MMC Norilsk Nickel's Environmental Policy](#)



[PJSC MMC Norilsk Nickel's Responsible Sourcing Policy](#)



[PJSC MMC Norilsk Nickel's Environmental Impact Assessment Policy](#)



[PJSC MMC Norilsk Nickel's Supplier Code of Conduct](#)



[PJSC MMC Norilsk Nickel's Stakeholder Engagement Policy](#)



Applicable to the rights of Company employees (▲), employees of suppliers and contractors (▲), local communities (▲) and indigenous small-numbered peoples (▲).

The 2030 Socially Sustainable Development Strategy and the 2031 Environmental and Climate Change Strategy, both approved by the Board of Directors, are closely linked to respect for human rights. The Company's key focus areas and initiatives aim to create comfortable working conditions, support employee health, unlock professional potential in line with the demands of the future economy, and enhance the quality of life for employees, local communities, and indigenous peoples while seeking to improve environmental conditions.

The Company adheres to high human rights standards, ensuring the compliance of its operations with Russian laws as well as applicable international standards and commitments.

Its corporate approach is grounded in compliance with the Constitution and legal codes of the Russian Federation along with the UN Guiding Principles

Human rights due diligence

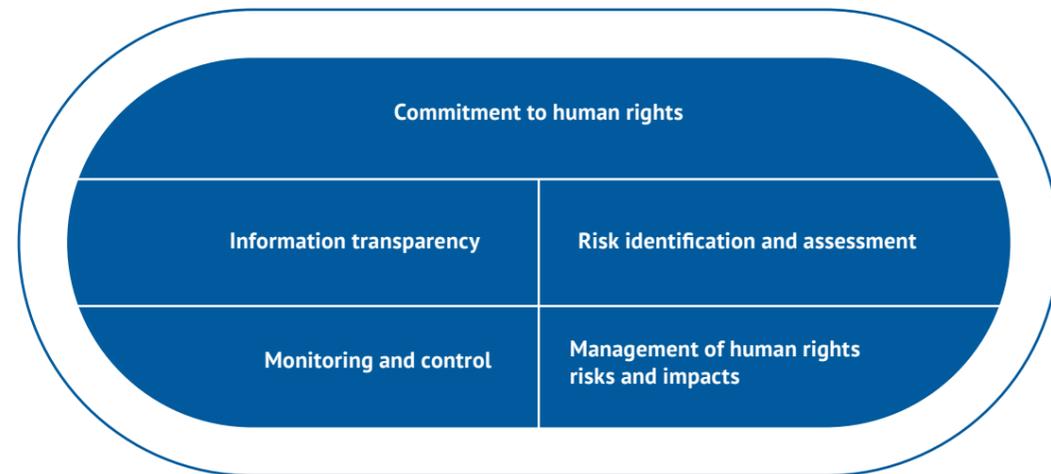
In 2024, Nornickel continued enhancing its human rights due diligence system (HR DDS), which consists of five key elements. The purpose of the HR

on Business and Human Rights (UNGPs). Nornickel also takes into account best practices from industry initiatives and is guided by international law¹.

The Company's top management is responsible for ensuring respect for human rights. To enhance engagement in sustainability management – including human rights protection – the system of annual team KPIs for senior management includes health and safety metrics. Specifically, the "Achievement of the H&S plan (including FIFR)" target has a weight of 30%.

Topics such as employee remuneration and motivation, working conditions, and work-related injuries are regularly reviewed by the Board of Directors and its relevant committees. In addition, the Company implements cross-functional initiatives aimed at protecting employee rights and achieving its strategic goal of zero work-related fatalities. As part of these efforts, programmes to build a strong safety culture are developed and implemented; for more details, please see the [Workplace Safety](#) section.

DDS is to prevent, mitigate, and remedy adverse impacts on human rights.



Key areas for improving the human rights due diligence system in 2024

Classification of reports and complaints	Methodology for assessing integrated human rights risk ²	Risk assessment at the Group entity level
The team behind the Corporate Trust Line (CTL) speak-up programme has implemented and tested a system for classifying reports. Each incoming report is assigned an appropriate category and subcategory depending on its topic and the human rights potentially involved	An integrated human rights risk assessment system was developed. The system incorporates an analysis of reports received via the CTL, the results of the "Let Everyone Be Heard. What Do You Think?" engagement survey, and non-financial reporting quantitative indicators	Integrated risk is assessed individually for each of the Group's production facilities, allowing for the prioritisation of areas where corrective and mitigating measures should be developed and implemented in relation to: <ul style="list-style-type: none"> Group entities with the highest human rights risks human rights most frequently exposed to violation risks across the Company as a whole processes that require systemic change



For details on the development of the HR DDS in the reporting year, please see [Nornickel's 2024 Human Rights Report](#).

Human rights training

GRI 410-1 | GRI 14.14.2

All Company employees are familiarised with [PJSC MMC Norilsk Nickel's Human Rights Policy](#) and are subject to the relevant provisions of the Policy.

In 2024, the Company launched a human rights training course that covers not only theoretical foundations but also practical case studies of rights violations that employees may encounter – both in performing their job duties and in everyday life.

The course is mandatory for Security employees and is taken in addition to separate, dedicated curriculum based on training programmes developed

by authorised federal executive authorities. These programmes are also intended, among others, for employees of third-party security providers, who must successfully pass a final qualification exam to be eligible to work as private security guards.

The programmes cover topics such as the lawful use of physical force or weapons, providing medical assistance, psychological training, and protecting life and health, among other key aspects. Subsequently, employees of security providers undergo periodic annual assessments. Nornickel's security units organise training sessions and drills for contractor security guards. In 2024, a total of 630 training sessions were conducted for Security employees.

The human rights course is not provided to employees of third-party security providers.

203

number of Company employees responsible for physical security

58%

percentage of Company employees responsible for physical security who completed the human rights training course in 2024



¹ For a full list of documents, please see [Nornickel's 2024 Human Rights Report](#).

² The integrated human rights risk reflects the current level of risk associated with each right, as well as any positive or negative trends, and can be used to further monitor the effectiveness of the HR DDS.

Grievance policy

GRI 2-16, 2-25, 2-26, 207-2 / TNFD Gc

Corporate Trust Line

Nornickel's Corporate Trust Line (CTL) is a core grievance mechanism, enabling all stakeholders to submit complaints and reports across a broad range of topics including violation of human rights, protection of assets and corporate interests, prevention of abuse, theft, and other violations. The CTL helps ensure transparency in stakeholder engagement and supports the mitigation of risks related to potential conflicts or unethical practices.

It covers all Company units and Group entities and maintains uniform standards in handling reports and enabling a prompt response to emerging concerns.

The Company has in place the [Procedure for the Corporate Trust Line of PJSC MMC Norilsk Nickel](#), which defines roles and responsibilities, guiding principles, a description of the business process, associated risks, and relevant KPIs.

Operational profile of the Corporate Trust Line

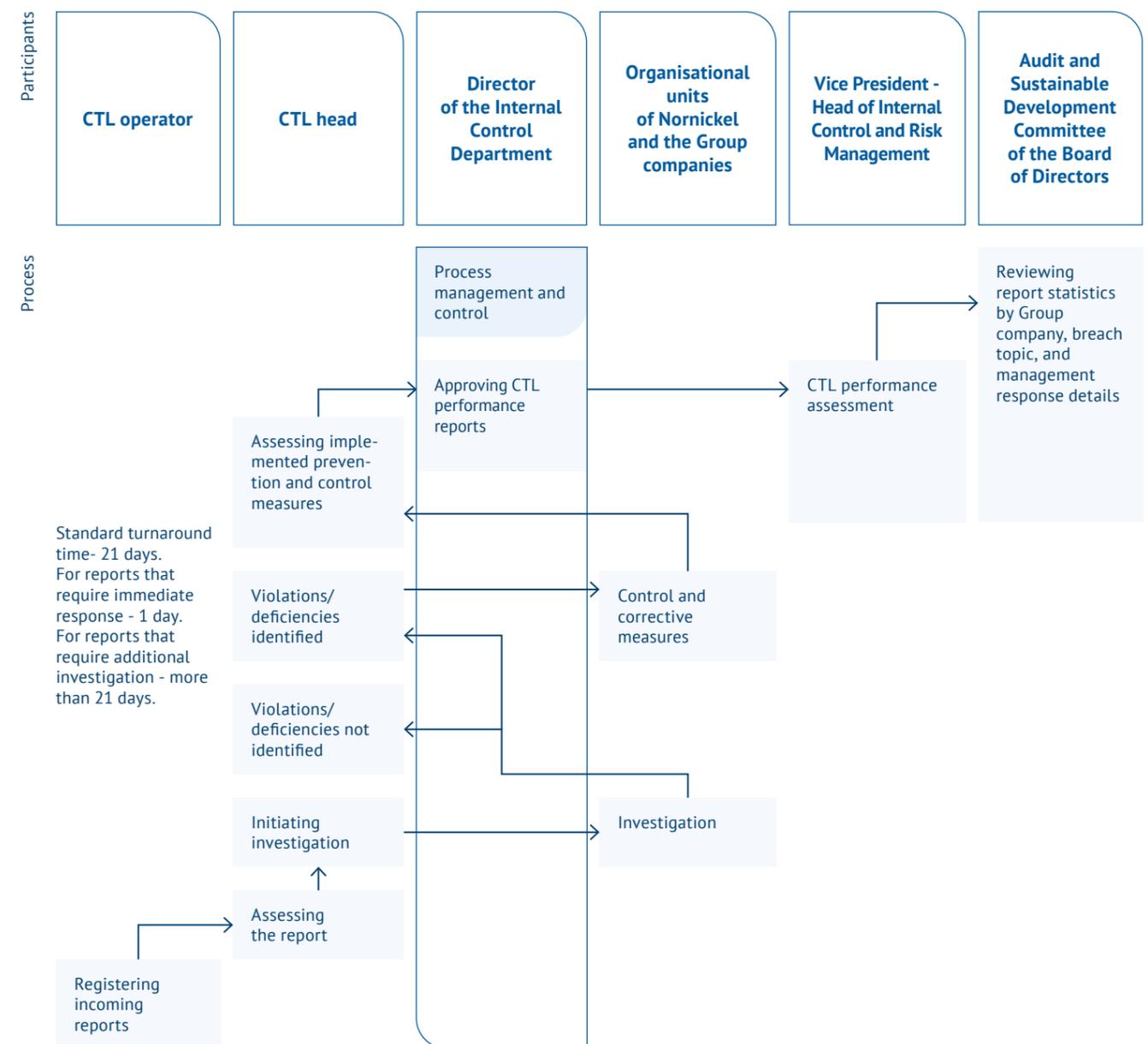
Key principles	<ul style="list-style-type: none"> Guaranteed confidentiality for reporting persons Independent consideration of reports Timely and unbiased consideration of all incoming reports, regardless of the position or tenure of the individual involved
Organisational structure	The CTL operates within the remit of the Internal Control Department
Employees responsible for the operation of the CTL	<ul style="list-style-type: none"> CTL operators – initial processing of reports Head of the CTL – coordination of activities, generation of reports Director of the Internal Control Department – general oversight and strategic guidance of the CTL's activities
Functions of organisational units	The Company's units that receive a request from the CTL are responsible for verifying the reported information, taking corrective actions, and submitting a follow-up report to the CTL. They are also promptly informed about the outcomes of the report review to support further oversight and decision making
Involvement of independent experts	The Sustainable Development Department coordinates the engagement of independent experts, including for complaint consideration and mediation, if requested by the reporting person ¹
Feedback	Reporting persons are provided with confirmation of the registration of their complaint/report, along with the option to complete a feedback form on the consideration and resolution process ²
Reporting	The Head of the CTL prepares a document containing report statistics by Group enterprise and by topic to inform unit heads and members of the Audit Committee of the Board of Directors.
CTL performance evaluation	<ul style="list-style-type: none"> Vice President – Head of Internal Control and Risk Management Audit Committee of Nornickel's Board of Directors Company employees covered by the "Let Everyone Be Heard. What Do You Think?" engagement survey via the questionnaire containing two questions about the CTL's performance

¹ In 2024, no requests to engage independent experts were submitted by reporting persons, and no external experts were engaged.
² An analysis of CTL interactions with reporting persons in 2024 showed that over 90% of reporting persons were satisfied with the response to their reports. Additional follow-up measures were taken for each unsatisfactory feedback, including with the involvement of experts from relevant functions, and follow-up communications with the reporting persons.

The Corporate Trust Line operates in strict accordance with the established procedure rules, ensuring the prompt and unbiased consideration of incoming reports. The standard turnaround time – from the moment a report is registered by a CTL operator to the review of investigation results by the responsible manager – is 21 business days. However, in certain cases (such as reports that require urgent response or situations that require in-depth analysis), the process may be accelerated or slowed down as needed.

If the reported information is confirmed, a set of corrective actions is initiated, including control measures, remediation of identified violations, and mitigation of potential consequences. When violations are identified, the Company addresses them while also developing measures to prevent similar cases in the future.

System for registering and reviewing reports submitted to the Corporate Trust Line



Contacts of the Corporate Trust Line

✉ skd@nornik.ru

☎ +7 (800) 700-19-41;
+7 (800) 700-19-45

Supernika mobile app (for Norinickel employees)

🌐 <https://nornickel.com/sustainability/corporate-hotline/>

📍 1st Krasnogvardeysky Drive 15, Moscow, Russia, 123112, Corporate Trust Line of MMC Norilsk Nickel

Information about the Corporate Trust Line is made available to employees via the intranet portal, the Company's website, information screens, physical stands, posters, and payslips.

Operational statistics of the Corporate Trust Line in 2024

1,279 reports

were received in 2024 (-38.5% y-o-y). The decrease in the number of reports is attributed to the launch of initiatives aimed at resolving employee concerns promptly on the ground. Employees are encouraged to raise their concerns with their immediate or higher-level managers to help improve the effectiveness of addressing violations or deficiencies. If the issue is not resolved, the employee may contact the Corporate Trust Line

651 reports

were accepted for consideration in 2024

696 reports

were resolved and closed in 2024 (26% confirmed, 74% not confirmed)¹

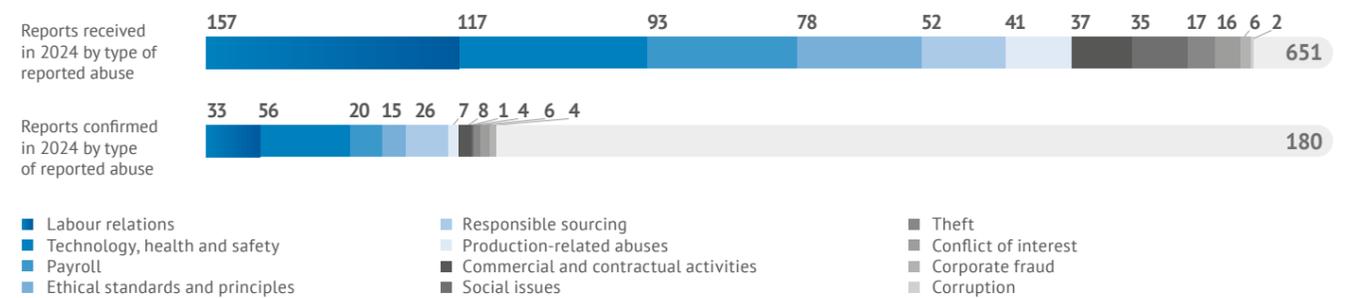
Corrective actions were taken to address all identified deficiencies. These measures included:

- purchasing and installing necessary equipment
- repairing premises and equipment
- remedying deficiencies across production and welfare facilities
- establishing claim management with counterparties, including sanctions for non-compliance with contract terms
- executing documents for allowance, compensation, and bonus payments
- providing employees with tools and PPE
- amending work and rest schedules
- holding regular team meetings to clarify concerns related to remuneration or organisational changes
- organising the work of commissions focused on resolving conflicts of interest and conflict situations
- holding employees at fault accountable through disciplinary action, including withholding bonuses.



As at 1 January 2024 and 31 December 2024, 146 and 101 reports were at the processing stage, respectively.

Breakdown of reports by type in 2024



In 2024, the Corporate Trust Line and the Sustainable Development Department continued their collaborative efforts to advance the Company's human rights agenda. As part of this work, an automated system was introduced to classify incoming reports by category and subcategory. For more details, please see [Norinickel's 2024 Human Rights Report](#).



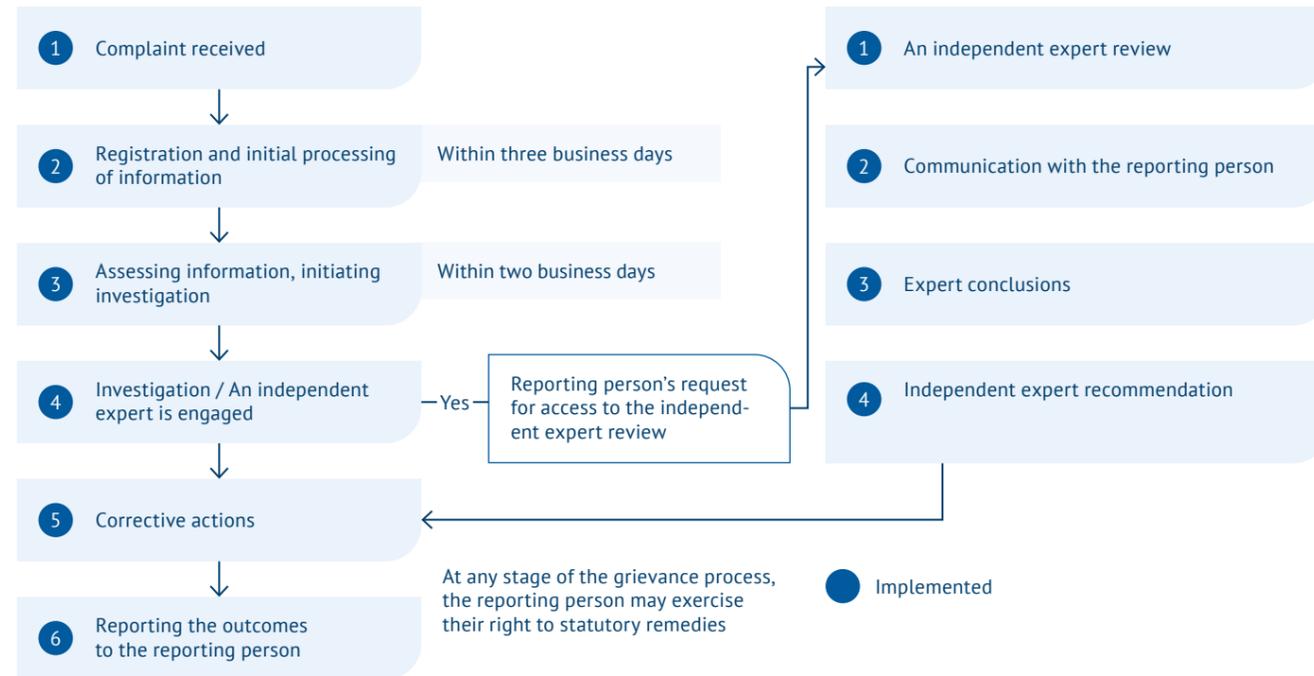
Grievance mechanism

Norinickel's grievance mechanism (GM) is a tool available to both Company employees and external stakeholders, including local residents in the regions where the Company operates, employees of suppliers and contractors, and indigenous communities.

The grievance mechanism is designed to facilitate the search for common ground, including with the involvement of an independent expert where appropriate. This approach helps ensure that the interests of all parties are taken into account and supports the prevention of conflict escalation. This mechanism does not replace existing public or corporate mechanisms for rights protection but serves as an additional tool for resolving disputes. Its use is entirely voluntary and does not in any way limit the right of citizens or organisations to seek recourse through government authorities to protect their legitimate interests.

¹ Including the reports still pending at the beginning of 2024.

Grievance process flow



Standard turnaround times for grievances

Through the Corporate Trust Service – up to 21 business days
Through community liaison offices, Company managers, and other channels – up to 30 calendar days

The Company does not retaliate against reporting persons who raise concerns, meaning that no disciplinary action or sanction is taken. Reporting person status is regularly monitored at all levels to detect any cases of undue pressure.

Upon receipt of a complaint, the relevant Company unit is identified to verify the information, assess the need for additional data, and consider engaging independent experts or referring the case to government agencies.¹

The GM's effectiveness is assessed on an ongoing basis through feedback from reporting persons and regular analysis of satisfaction levels, as well as annually through stakeholder consultations in the Company's regions of operation and the "Let Everyone Be Heard. What Do You Think?" survey.

In 2024, particular attention was paid to standardising the process for handling complaints received through various channels and introducing unified operating principles. The Company continues to analyse incoming reports, identify systemic issues, and enhance feedback mechanisms to ensure timely responses and maintain a high level of stakeholder trust.

Updated Policy of Engagement with Indigenous Small-Numbered Peoples

In 2024, Nornickel updated its corporate document on engagement with indigenous minorities, emphasising their right to independently determine their development priorities. The Company recognises the vulnerability of these communities and is committed to considering their interests in its operations. It provides indigenous minorities with an accessible grievance mechanism through which they can report any trespassing, desecration, or destruction of sacred sites or burial areas by Company employees or contractors. The Company responds to such reports without delay and takes appropriate measures. The operation of the GM in the context of engagement with indigenous minorities is overseen by a third party (an independent expert).

¹ Done by the respective individuals or legal entities themselves: the Company does not forward reports to government authorities.

Business ethics and anti-corruption

Nornickel's anti-corruption approach

In conducting its core operations and building business relationships with stakeholders, Nornickel adheres to the principles of honest and ethical business conduct and maintains a zero-tolerance approach to all forms and manifestations of corruption at every level of the organisation.

The Company complies with [anti-corruption laws of the Russian Federation and other countries where it operates](#) and is guided by [international legal standards](#) and internal regulations listed in [Nornickel's 2023 Sustainability Report](#).

Key internal regulations on anti-corruption

- [PJSC MMC Norilsk Nickel's Code of Conduct and Ethics for Members of the Board of Directors](#)
- [PJSC MMC Norilsk Nickel's Anti-Corruption Policy](#)
- [PJSC MMC Norilsk Nickel's Supplier Code of Conduct](#)
- [Business Ethics Code of PJSC MMC Norilsk Nickel](#)

Nornickel's corporate codes, policies, and regulations define the key principles and focus areas of the Company's anti-corruption efforts, govern the management of corruption risks, and set standards of conduct for employees, suppliers, contractors, customers, and other stakeholders.

Anti-corruption: allocation of responsibilities

The roles and responsibilities within the anti-corruption compliance system are detailed in [PJSC MMC Norilsk Nickel's Anti-Corruption Policy](#).

The anti-corruption compliance team at Nornickel's Head Office provides advisory and methodological support on anti-corruption matters, develops procedures and mechanisms for managing corruption risks, and, within its remit, designs approaches to building corporate culture, promoting corporate values, and upholding ethical conduct. Individual KPIs are set annually for each member of the compliance team.

Reporting corruption

Any stakeholder may report suspected corruption anonymously via several available communication channels (for more information, please see the [Grievance Policy](#) section).

Nornickel guarantees protection for employees who report suspected corruption from retaliation, discrimination, or any form of pressure, including dismissal, reduced bonuses, or demotion.



Results of anti-corruption efforts in 2024

GRI 205-3 / SASB EM-MM-510a.1 / UNCTAD D.2.1/ MED-43

GRI 14.22.4

The Company has an anti-corruption compliance system in place to promote zero tolerance for violations of business ethics, bribery, and corruption. A range of internal initiatives is carried

out on a regular basis to enhance the system's effectiveness, including the review and update of the Company's anti-corruption procedural documents.

Measures aimed at developing and improving the anti-corruption compliance system in 2024



A mechanism for informing counterparties of the Company's anti-corruption requirements and principles¹ was adapted and launched



A training campaign on mitigating corruption risks when engaging with counterparties was delivered to Group employees responsible for implementing anti-corruption compliance procedures



Measures were taken to assess the effectiveness of controls implemented to mitigate corruption risks at the Group



A framework for tracking inquiries from regulatory and supervisory authorities regarding anti-corruption compliance across the Group was established



The development phase for automating the conflict of interest management module was launched²



An employee questionnaire survey was conducted to evaluate the state of corruption and the effectiveness of anti-corruption initiatives at the Company's branches and representative office



Measures were taken to monitor and assess compliance with the legal requirements of the Russian Federation regarding the employment of and contracting with former government officials

For more than 10 years, Norinickel has been a signatory to the Anti-Corruption Charter of Russian Business, and, as part of this commitment, biennially

presents a public statement affirming its adherence to anti-corruption standards.

In 2024, MMC Norilsk Nickel confirmed its leadership in the Anti-Corruption Ranking of Russian Business and received the highest **AAA+++** rating as a company with the most robust anti-corruption safeguards in place.

In addition, the Kola site's metals and mining enterprise, which participated in the ranking for the first time in 2024, demonstrated strong anti-corruption performance with an **AA+** rating and is focused on incorporating expert recommendations for improving its existing anti-corruption measures.

Statistics on incidents of corruption in 2024

5

- total number of confirmed incidents of corruption
- number of confirmed incidents in which employees were disciplined for corruption (four of them dismissed)

0

confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption in 2024

RUB 3.1 mln

total amount of corruption-related fines imposed on the Company or its employees, paid or payable (i.e. acknowledged and not contested by the penalised party) in 2024

2

public legal cases regarding corruption brought against the Company or its employees or closed during the reporting period

Throughout the reporting period, joint efforts of Norinickel's Security Service and law enforcement agencies resulted in initiating:

- four criminal cases against seven Norinickel Group employees on charges of commercial bribery
- one criminal case against a Norinickel Group employee on charges of petty bribery.

Court verdicts were issued in two of the cases under Article 204 of the Criminal Code of the Russian Federation ("Commercial Bribery"), with five employees found guilty of the offences they were charged with.

Employee communication and training on anti-corruption

GRI 205-2

GRI 14.22.3

Communication and training on anti-corruption are a cornerstone of the Company's anti-corruption compliance system. The Company continuously works to strengthen this component, employing a wide range of tools to embed the principles of integrity in everyday actions of all Group employees. Accordingly, anti-corruption communication and training initiatives for employees are carried out in line with the approved annual plan. Specifically:

- Internal communication channels are used to facilitate regular broadcasts and publications, including information on:

- anti-corruption practices
- amendments to internal documents
- achievements and upcoming events related to anti-corruption compliance

- Concise memos summarising regulatory documents are developed
- Training programmes are designed and updated to ensure all employees, across all levels, are trained

Communication and training events at the Company³

New employee hires	Briefing on anti-corruption Familiarisation with PJSC MMC Norilsk Nickel's Anti-Corruption Policy Signing an addendum to the employment contract outlining employees' anti-corruption obligations
All employees	Anti-Corruption remote learning course
HR employees	Course on anti-corruption compliance for HR services
Members of governance bodies	Anti-Corruption for Managers remote learning course

¹ The information materials are fully automated and available to every counterparty with whom an agreement is signed, via a link included in the anti-corruption clause.

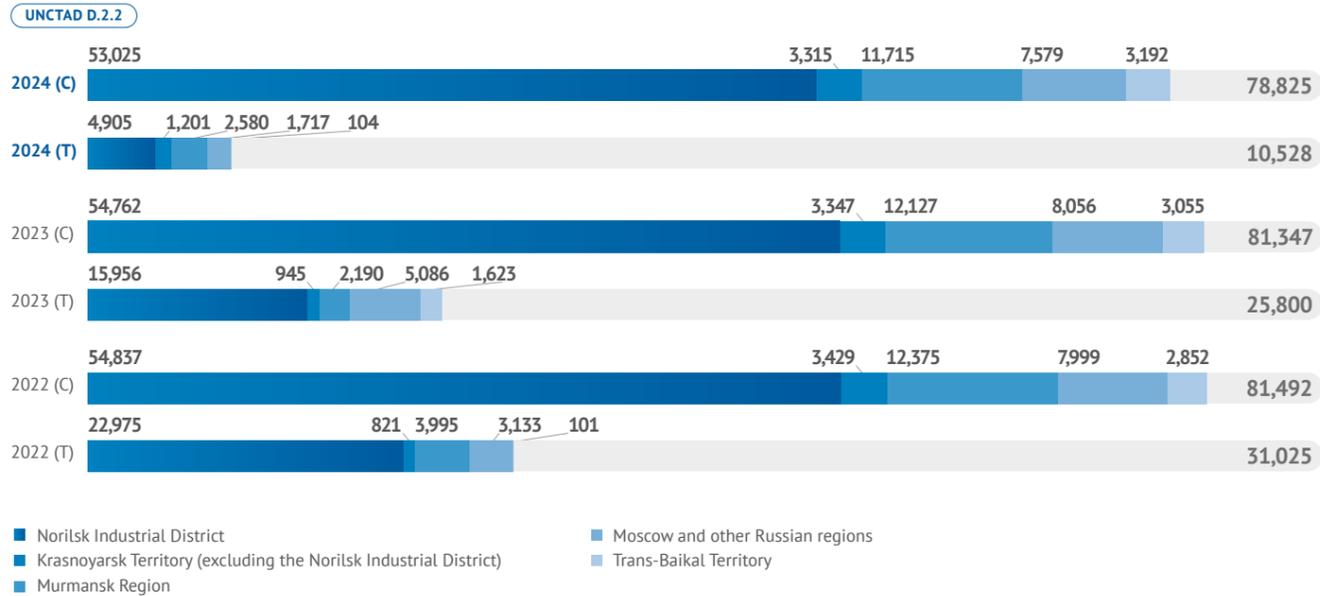
² Scheduled for completion in 2025–2026.

³ The listed online courses are available at any time on the Norinickel Academy corporate platform.

In addition, in 2024, an educational campaign was held to minimise corruption risks when engaging with counterparties, targeting Group

employees responsible for implementing anti-corruption procedures as well as legal teams across the Norinickel Group.

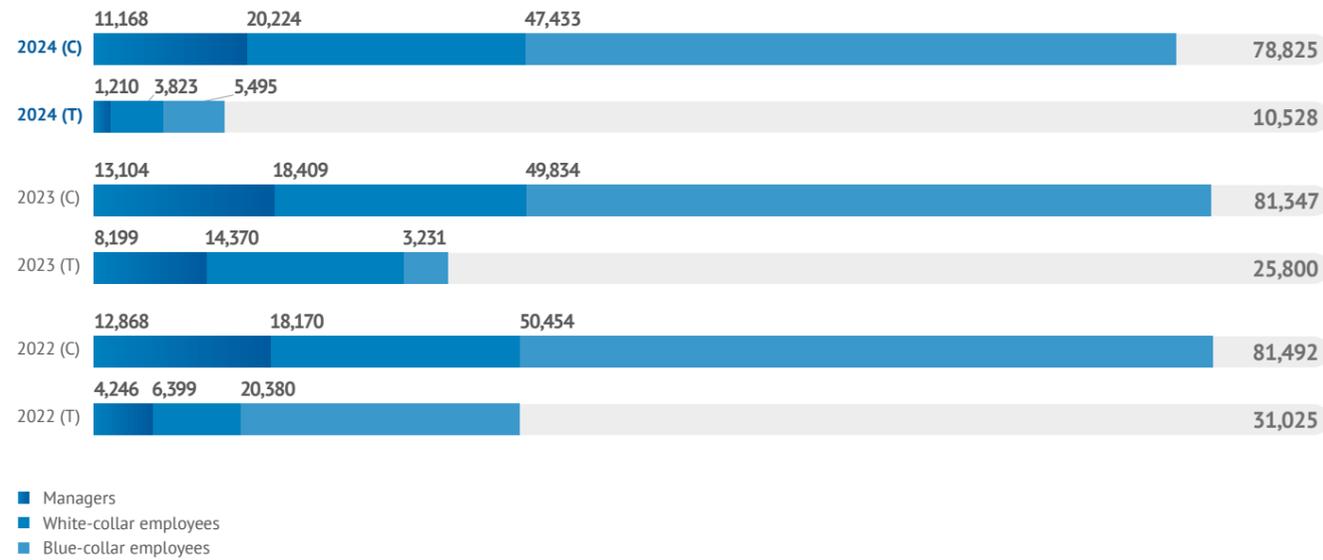
Number of employees that the Group's anti-corruption policies and procedures were communicated to (C) and that received training (T) on them in 2022-2024, by region of operation¹



Indicators	Norilsk Industrial District			Krasnoyarsk Territory (excluding the Norilsk Industrial District)			Murmansk Region			Moscow and other Russian regions			Trans-Baikal Territory			Total		
	2022	2023	2024	2022	2023	2024	2022	2023	2024	2022	2023	2024	2022	2023	2024	2022	2023	2024
Share of employees that the Group's anti-corruption policies and procedures were communicated to	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Share of employees that received training on anti-corruption policies and procedures	0.42	0.29	0.093	0.24	0.28	0.36	0.32	0.18	0.22	0.39	0.63	0.23	0.04	0.53	0.03	0.38	0.32	0.13

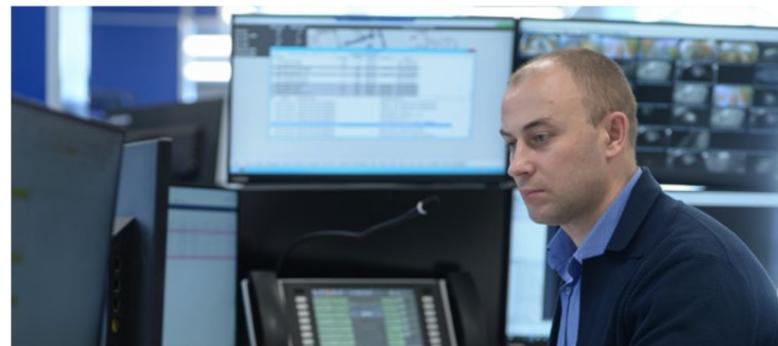
¹ The decrease in the number of employees that have received training on anti-corruption policies and procedures was due to organisational changes: the remote learning course was updated at the end of 2022 and assigned to all Company employees to be completed by the end of Q1 2023. Accordingly, there was no need for training on this scale in 2024, and the course was only assigned to newly hired employees.

Number of employees that the Group's anti-corruption policies and procedures were communicated to (C) and that received training (T) on them in 2022–2024, by category



Indicators	Managers			White-collar employees			Blue-collar employees			Total		
	2022	2023	2024	2022	2023	2024	2022	2023	2024	2022	2023	2024
Share of employees that the Group's anti-corruption policies and procedures were communicated to	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Share of employees that received training on anti-corruption policies and procedures	0.33	0.63	0.11	0.35	0.78	0.19	0.4	0.06	0.12	0.38	0.32	0.13

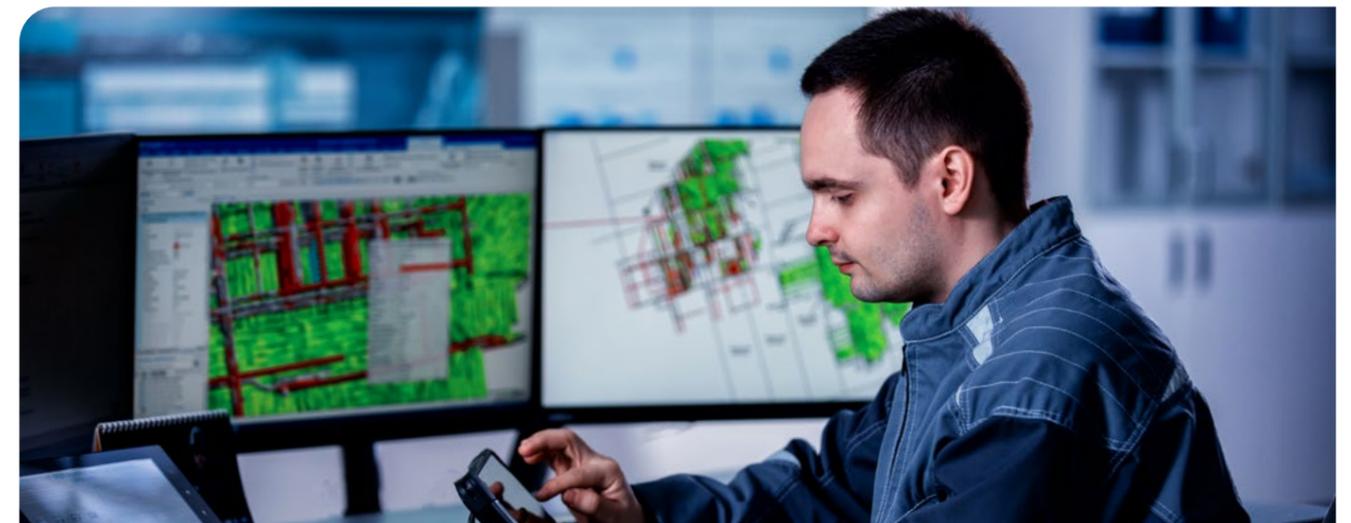
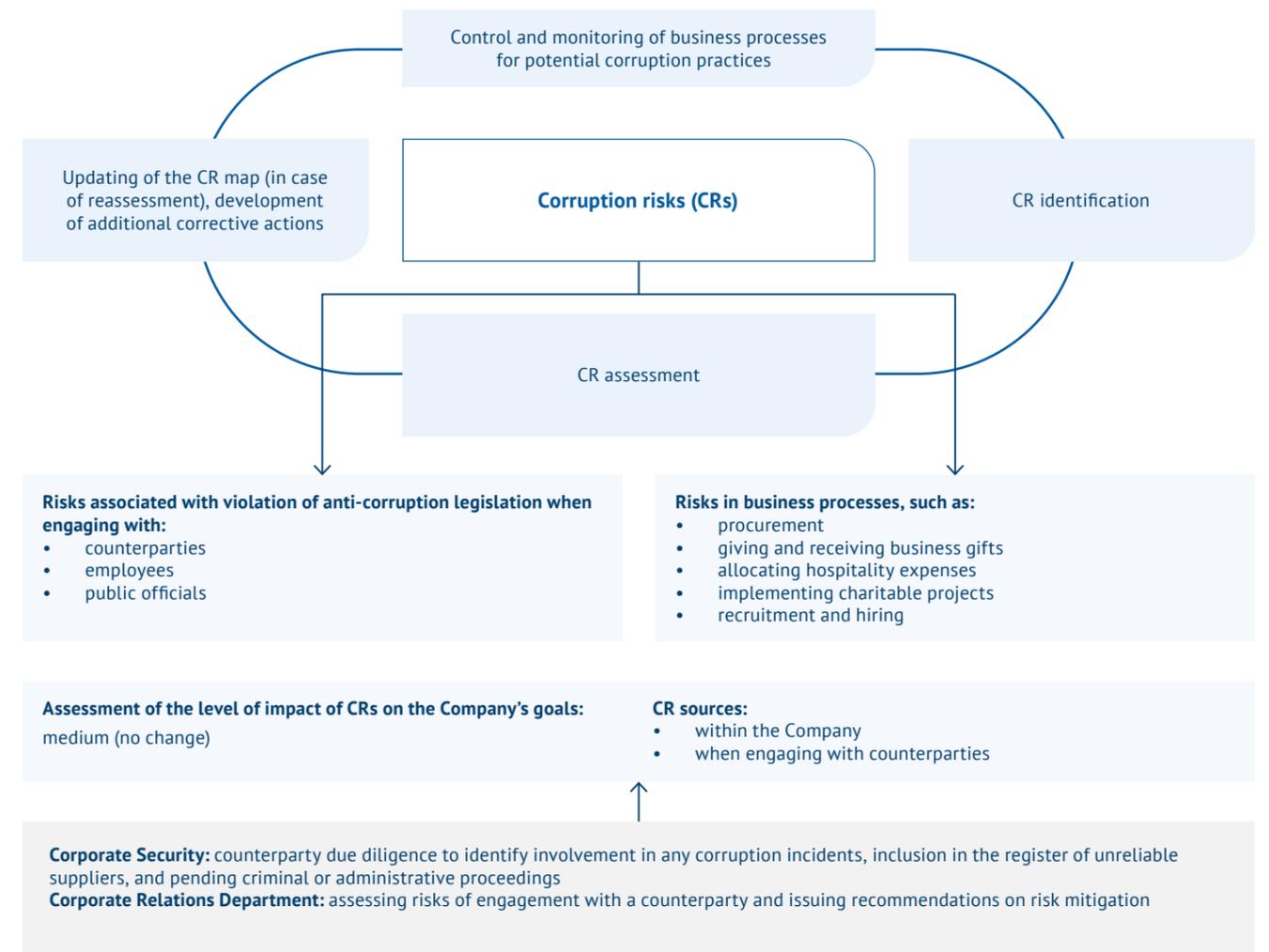
Corruption risk management at Nornickel



GRI 205-1 GRI 14.22.2

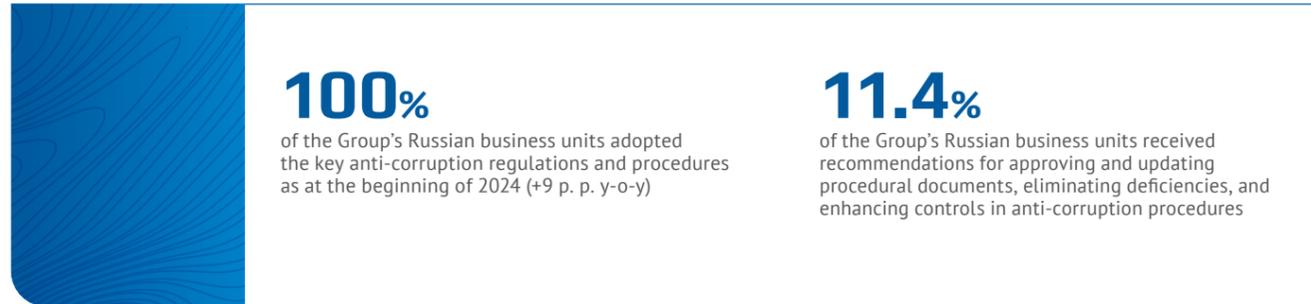
Corruption risks are included in Nornickel's corporate risk register and are managed on a regular basis through processes such as identification, assessment, control, and monitoring, along with timely response and corrective actions where necessary.

Corruption risks (CRs)



Results of anti-corruption monitoring in 2024

✓ An initiative was put in place to oversee the practical enforcement of anti-corruption procedures across the Norinickel Group



Managing conflicts of interest

Norinickel's key principles for managing conflicts of interest



Norinickel places particular emphasis on the timely identification and prevention of conflicts of interest.

<p>Regulations on the Prevention and Management of Conflicts of Interest at MMC Norilsk Nickel</p> <p>require employees to disclose any conflicts of interest that may arise in performing their job duties if personal interests are involved</p>	<p>Standard declaration form approved at MMC Norilsk Nickel</p> <p>completed by candidates applying for vacant positions at the Company and by individuals entering into independent contractor agreements</p>
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The Norilsk Nickel Group set up standing conflict of interest commissions to enhance the effectiveness of managing conflicts of interest and improve corporate culture.

In 2024, Norinickel developed and published an interactive memo on conflict of interest management, available on its corporate portal.

Measures to ensure compliance with antitrust laws

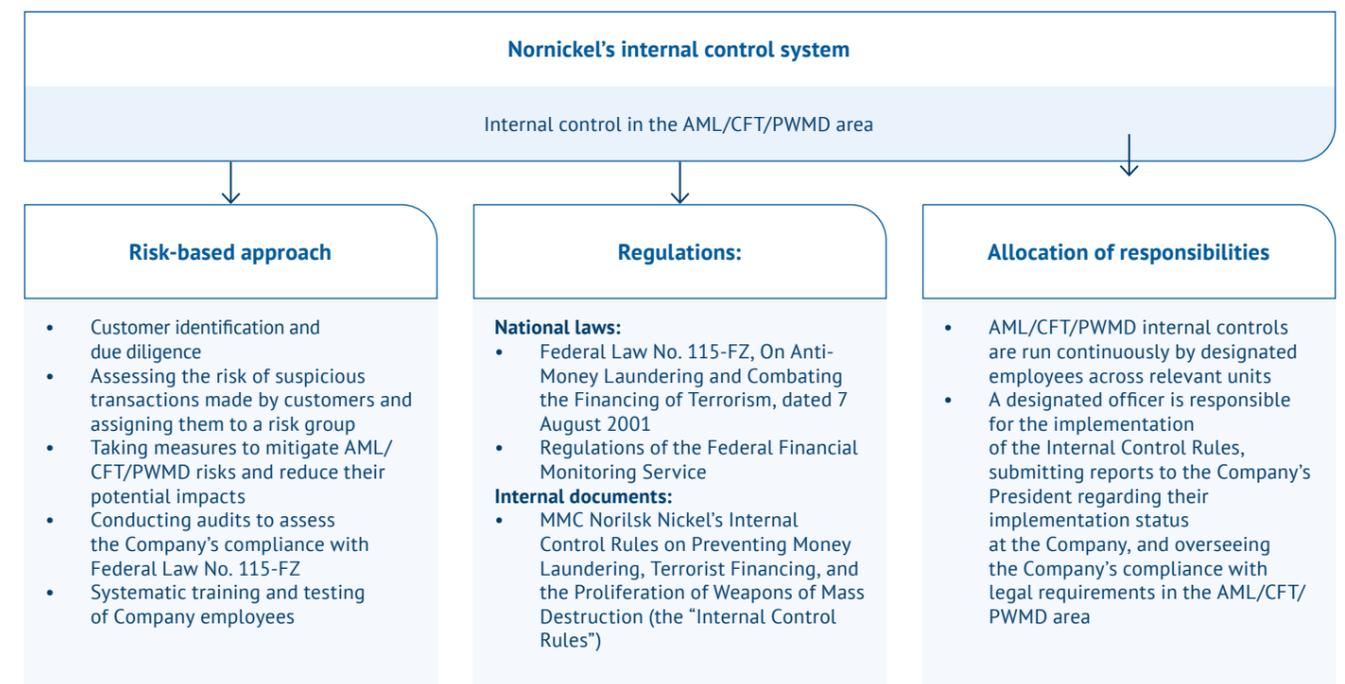


Norinickel maintains an antitrust compliance system aligned with Federal Law No. 135-FZ, On Protection of Competition, dated 26 July 2006.

Corporate Security identifies unfair competition risks as part of counterparty due diligence.

In 2024, no significant violations of antitrust legislation involving Norinickel were recorded.

Anti-money laundering, combating the financing of terrorism and proliferation of weapons of mass destruction



Responsible supply chain



At every stage of the supply chain, Norinickel adheres to ethical standards and the principles of sustainable business conduct, prioritising environmental protection, social responsibility, and corporate governance. The Company promotes key sustainability principles among its suppliers of raw materials, goods,

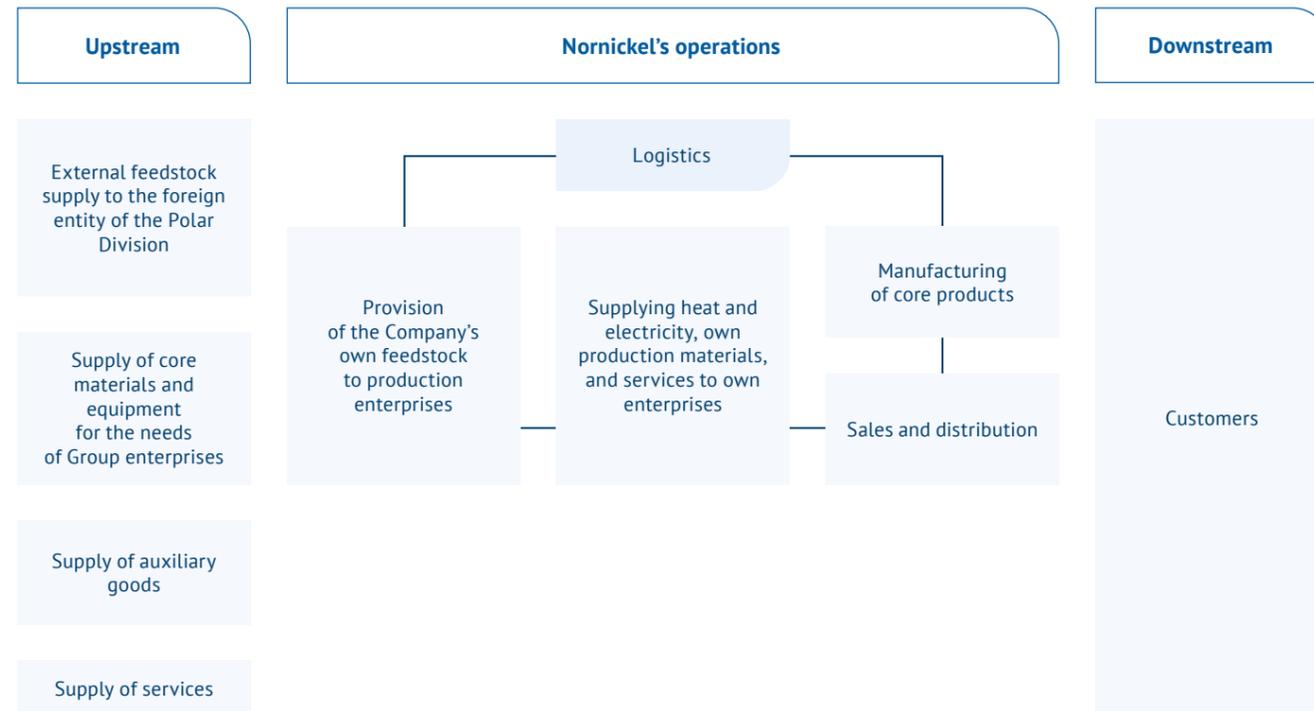
works, and services, encouraging them to comply with established standards and guidelines, manage relevant risks, and respond to increasing consumer demands. Committed to openness and transparency in responsible supply chain management, the Company publishes relevant reports¹ on an annual basis.

The Company has in place [PJSC MMC Norilsk Nickel's Responsible Sourcing Policy](#) (the "Policy") and [Supplier Code of Conduct](#) (the "Code"), which reflect the Company's principles for building and managing a responsible supply chain. Other internal documents related to the responsible supply chain are listed in [Norinickel's 2023 Sustainability Report](#) and are publicly available on the [Company website](#).

In 2024, the Company launched a training course on responsible supply chains, aimed at familiarising Group employees with Norinickel's relevant internal documents and processes as well as fostering an understanding of the key approaches and best practices in building responsible supply chains. Details on the training activities conducted in 2024 are available in [Norinickel's 2024 Responsible Supply Chain Report](#).

Key elements of Norinickel's supply chain

GRI 2-6, TNFD Ra



Engagement with suppliers to manage a responsible supply chain

When establishing business relationships, suppliers are expected to comply with the [Code](#). In addition, Norinickel expects its suppliers to adhere to the principles outlined in the [Policy](#) and meet the requirements of applicable laws and regulations, universally recognised principles, norms of international law, and international treaties.

include an anti-corruption clause that affirms the implementation of anti-corruption measures and reflects the Company's commitment to fostering a corporate culture that does not tolerate any form of corruption.

If suppliers refuse to comply with the [Code](#) or clearly fail to demonstrate progress in meeting its requirements, Norinickel may reconsider its relationship with such suppliers.

The [General Contracting Terms and Conditions](#) as well as [standard forms of master agreements and contracts with suppliers](#), were amended to include a clause requiring compliance with the Company's sustainability requirements listed in the Code. This clause also informs suppliers about the opportunity to contact [Norinickel's Corporate Trust Line](#), which is the Company's principal grievance mechanism. In addition, supply contracts

Nornickel's approach to assessing sustainability practices of all supplier categories takes into account stakeholder expectations, standards, and regulatory recommendations, including:

- A Guide for Issuers: How to Comply with Best Sustainability Practices, drafted by Moscow Exchange, including responsible supply chain management practices
- 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 chain².

When assessing suppliers for compliance with responsible supply chain principles, the Company categorises them into two groups: mineral suppliers³ and suppliers of goods, works, and services⁴.

¹ Norinickel's 2024 Responsible Supply Chain Report is available on the Company website at: https://www.nornickel.com/upload/files/ru/investors/reports-and-results/annual-reports/responsible_supply_chain_report_2024-eng.pdf.

² Appendix to Letter of the Bank of Russia No. IN-06-28/49 dated 12 July 2021.

³ Mineral suppliers in this section means suppliers, shippers, and processors of nickel-, cobalt-, and copper-containing minerals.

⁴ Suppliers of goods, works, and services in this section means all categories of the Group's suppliers.

Engagement with mineral suppliers

Mineral suppliers' compliance with the Code is monitored through the due diligence management system (the "System").

The System is aligned with the following requirements and guidance

The System is aligned with the following requirements and guidance

The Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance")

LME's responsible sourcing requirements and recommendations

Standards and principles of leading sustainability initiatives in the industry: ICMM, IRMA, RMI (including JDDS) as well as the Chinese Due Diligence Guidelines for Responsible Mineral Supply Chains of the China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC)

Queries from the Company's customers

The system is designed to identify potential risks affecting the sustainability and transparency of mineral supply chains and to mitigate risks highlighted in the OECD Guidance, including supply of minerals from conflict areas, human rights violations, money laundering, fraud, and corrupt practices.

The tools provided by the System allow for the collection of additional data on participants in the mineral supply chain, including information about their environmental, social, and governance (ESG) practices and approaches.

Since 2021, the System has been rolled in phases across individual enterprises of the Polar and Trans-Baikal Divisions. For instance, standards for mineral supplier due diligence were approved, regulating due diligence procedures, interactions between organisational units, and allocation of powers and responsibilities.

The Company has been conducting annual due diligence on mineral suppliers since 2021. In the reporting period, the exercise covered

mineral suppliers of the Polar Division's enterprises. Following due diligence on 100% of mineral suppliers for the Group's Russian assets, no confirmed risks or risk indicators were identified. Since Trans-Baikal Division enterprises had no suppliers in this category, due diligence was not carried out.

Engagement with suppliers of goods, works, and services

Since 2023, the Company has been assessing the sustainability practices of its suppliers of goods, works, and services for compliance with the Code's requirements. The assessment process envisages a survey and includes an analysis and assessment of the supplier operations' ESG component. In 2024, the Company conducted an assessment of a sample of its largest suppliers¹ of goods, works, and services, accounting for 35% of the Group's total procurement volume. The survey results are disclosed in detail in [Nornickel's 2024 Responsible Supply Chain Report](#).

¹ The largest external suppliers of the Group's Russian assets in terms of payment amounts in 2023.



Nornickel maintains an open dialogue with suppliers when conducting due diligence or assessing sustainability practices, aiming to build their capabilities. The Company pays particular attention to raising suppliers' awareness, including by holding training sessions, clarifying the requirements and details of mineral supply chain due diligence procedures and the sustainability survey for suppliers of goods, works, and services, and providing support to suppliers during due diligence and survey.

Procurement

Procurement is carried out in accordance with the Company's established procedures and policies. Uniform procedures apply to both centralised procurement and independent procurement by Head Office units, Company branches, and Group

enterprises. Depending on the budgeted cost, procurement can be organised either as a tender, simple procurement, or simplified procurement. Procurement procedures involve collective procurement bodies at various levels.

Nornickel's primary focus is on improving the effectiveness of procedures for identifying reliable suppliers of high-quality products who guarantee supplies at a fair market price.

Counterparty due diligence in procurement activities

Nornickel regularly conducts mandatory due diligence on its current and potential contractors to verify their reliability, solvency, and financial stability². The procurement process includes controls for compliance with sustainability

requirements. For a description of the key stages of procurement procedures, including a list of regulatory documents and the monitoring process for non-financial factors, please see [Nornickel's 2023 Sustainability Report](#).

² Due diligence is mandatory if at least one of the following conditions applies: the counterparty has not previously undergone due diligence; more than 12 months have passed since the last review; or the procurement involves a major purchase. The process includes an analysis of the counterparty's registration data, financial and operational performance, management team, beneficiaries, and business environment, as well as a check for inclusion on restricted lists.



>13.7 thousand suppliers

registered in SAP SRM at the end of 2024 (+1.6 thousand suppliers y-o-y). The Company engages with original equipment manufacturers (OEMs) to accredit them in SAP SRM

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Registration in SAP SRM is free of charge, does not require a digital signature, and imposes no additional obligations



Suppliers' personal accounts within the SRM system allow counterparties to manage document flow, track task progress across stages, share files, and exchange instant messages

Ensuring procurement efficiency and transparency

The Company has implemented an SAP SRM automated solution for supplier relationship management ("SAP SRM"), which helps enhance transparency in supplier selection and increase competition in procurement procedures.



Current and prospective suppliers can use SAP SRM to communicate online with procurement teams across all product categories and access up-to-date information about upcoming procurements

In 2024, the Company signed over 4.7 thousand agreements/contracts (+0.5 thousand y-o-y) for centralised procurement of materials and equipment worth around

RUB 93.6 billion

In the reporting year, Nornickel completed 20 pilot tests of equipment and materials, including 10 successful tests. Another five pilot tests are currently underway.

In addition, the Company website has a dedicated [Suppliers](#) section, containing key information about the Group's procurement principles and procedures and planned needs. The section also features a register of unreliable counterparties as well as announcements and invitations to participate in procurement procedures.



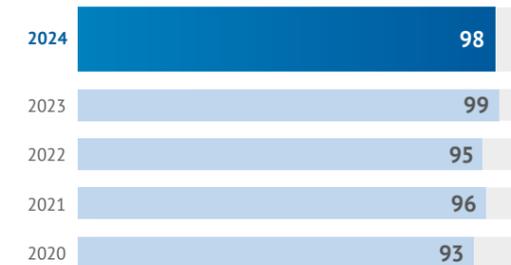
Breakdown of the Nornickel Group's suppliers and contractors with respect to centralised procurement (number of companies)



■ Domestic suppliers and contractors
■ Foreign suppliers and contractors

Domestically sourced goods, works, and services in total procurement of goods, work, and services (%)¹

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Nornickel fosters relationships with manufacturers of equipment and materials that have the greatest impact on its ability to achieve strategic goals. In an effort to boost the share of domestic manufacturers, Nornickel has developed a centralised pilot testing procedure aimed at increasing competition and replacing imported materials and equipment with Russian-made alternatives. Foreign suppliers are mainly engaged for supplying unique equipment or systems that do not have Russian alternatives.

¹ Data are collected for procurement of materials and equipment only. Centralised tracking by supplier location is not maintained for other procurement categories.

Product quality and supply reliability

Product quality assurance

The interests of product consumers and society at large have always been and remain a top priority for Norinickel. In quality management, the Company adheres to the principles outlined in ISO 9001:2015.

Quality-related goals and objectives are aligned with corporate strategic goals and approved by management based on annual performance reviews of the Corporate Integrated Management System. Norinickel's overall approach to quality management is grounded in strict compliance with applicable laws, standards, and regulations; effective risk management; continuous production improvement and technological development; and a strong focus on enhancing customer satisfaction with product and service quality.

In manufacturing, Norinickel ensures that its products meet the requirements of regulatory documents while also considering customer-specific demands – improving chemical composition, appearance, and packaging – as well as expanding the product range and venturing into new product segments. In 2024, the Polar Division shipped copper concentrate compliant with TU 07.29.11-040-49156713-2024 to China, introduced new nickel grades – NORINICKEL PLATING GRADE and NORINICKEL HIGH PURITY – for electroplating and superalloy production, and produced nickel sulphate at its Kola site.

Norinickel's Corporate Integrated Management System

CIMS training

In 2024, more than 170 employees from the Polar Division's enterprises² and the Group's transport divisions were trained in environmental safety, environmental reporting, environmental impact assessment, and requirements of ISO standards.



To enhance the competitiveness and marketability of its products and services, ensure production safety, and improve supply reliability, the Company has implemented a Corporate Integrated Management System ("CIMS")¹, which is evolving in compliance with ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018.

Customer satisfaction at the Company is governed by [PJSC MMC Norilsk Nickel's Quality Policy](#), which is aligned with internal documents and corporate standards.

In 2024, a number of recertification and surveillance audits were conducted across MMC Norilsk Nickel. The audits confirmed that the CIMS complies with ISO standards (with the compliance certificates available on the [Company website](#)).

Ensuring reliable and uninterrupted supplies

Norinickel's system for product supply planning and monitoring, close coordination between its sales and production units, own cargo fleet, and regular customer feedback ensure the reliable and uninterrupted supply of Norinickel products.

The Company's sales strategy is focused on securing a stable position in the market. Norinickel aims to maintain a balanced distribution of nickel supplies across various end-use sectors. As the world's largest producer of palladium, the Company prioritises direct long-term contracts with end consumers to help stabilise the palladium market while promoting market development, in particular, through efforts to explore and implement new applications and uses for palladium.

One of the key focus areas of the 2024–2026 Operational Efficiency Programme is to expand the Company's presence in external markets.

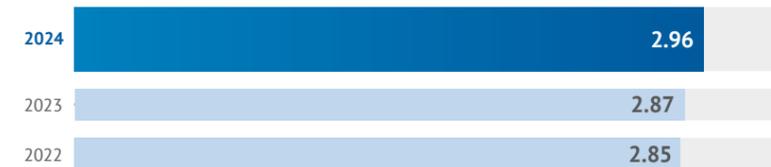
Throughout the history of Norinickel, it has never failed to meet its obligations to deliver products to consumers.

Information on the consumer properties of each product is provided in the relevant specifications and contract documents, in full compliance with Russian and international laws.

Customer satisfaction

Norinickel annually assesses customer satisfaction through questionnaire surveys. Compliance with contractual obligations is audited and analysed on a regular basis.

Customer satisfaction score (points)



The Company has set a target customer satisfaction level of at least 2.50 points on a three-point scale. Survey results from 2022 to 2024 consistently exceeded this benchmark, reflecting Norinickel's robust performance. Each year, Norinickel develops a comprehensive action plan focused on enhancing customer satisfaction.



30 complaints and reports

regarding the quality of the Company's products and services were received in 2024 and resolved out of court

24 complaints

were found to be unsubstantiated; however, all consumers' reports and suggestions were considered, with corrective actions developed in response to 16 complaints (including 10 unsubstantiated ones)

¹ The Kola site has in place an integrated management system (IMS) compliant with ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018.

² Within the IMS framework.