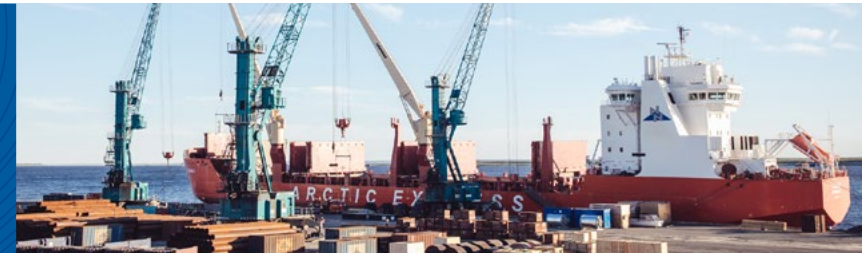


Responsible supply chain



At every stage of the supply chain, Nornickel 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,

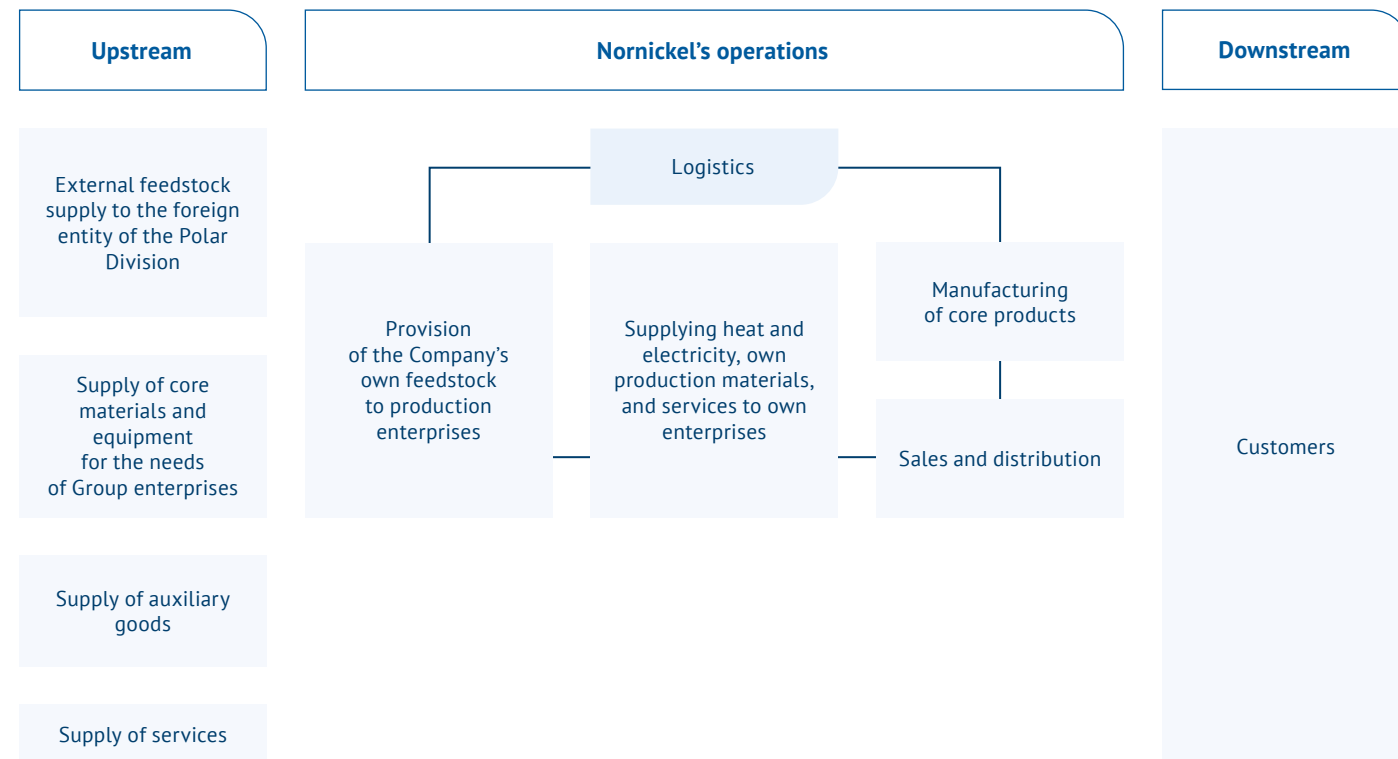
works, and services, encouraging them to comply with established standards and guidelines, manage relevant risks, and respond to increasing consumer demands. Committed to openness and transparency in responsible supply chain management, the Company publishes relevant reports¹ on an annual basis.

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 [Nornickel'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 Nornickel'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 [Nornickel's 2024 Responsible Supply Chain Report](#).

Key elements of Nornickel'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, Nornickel 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.

If suppliers refuse to comply with the [Code](#) or clearly fail to demonstrate progress in meeting its requirements, Nornickel 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 [Nornickel's Corporate Trust Line](#), which is the Company's principal grievance mechanism. In addition, supply contracts

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.

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 Nornickel'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

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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.

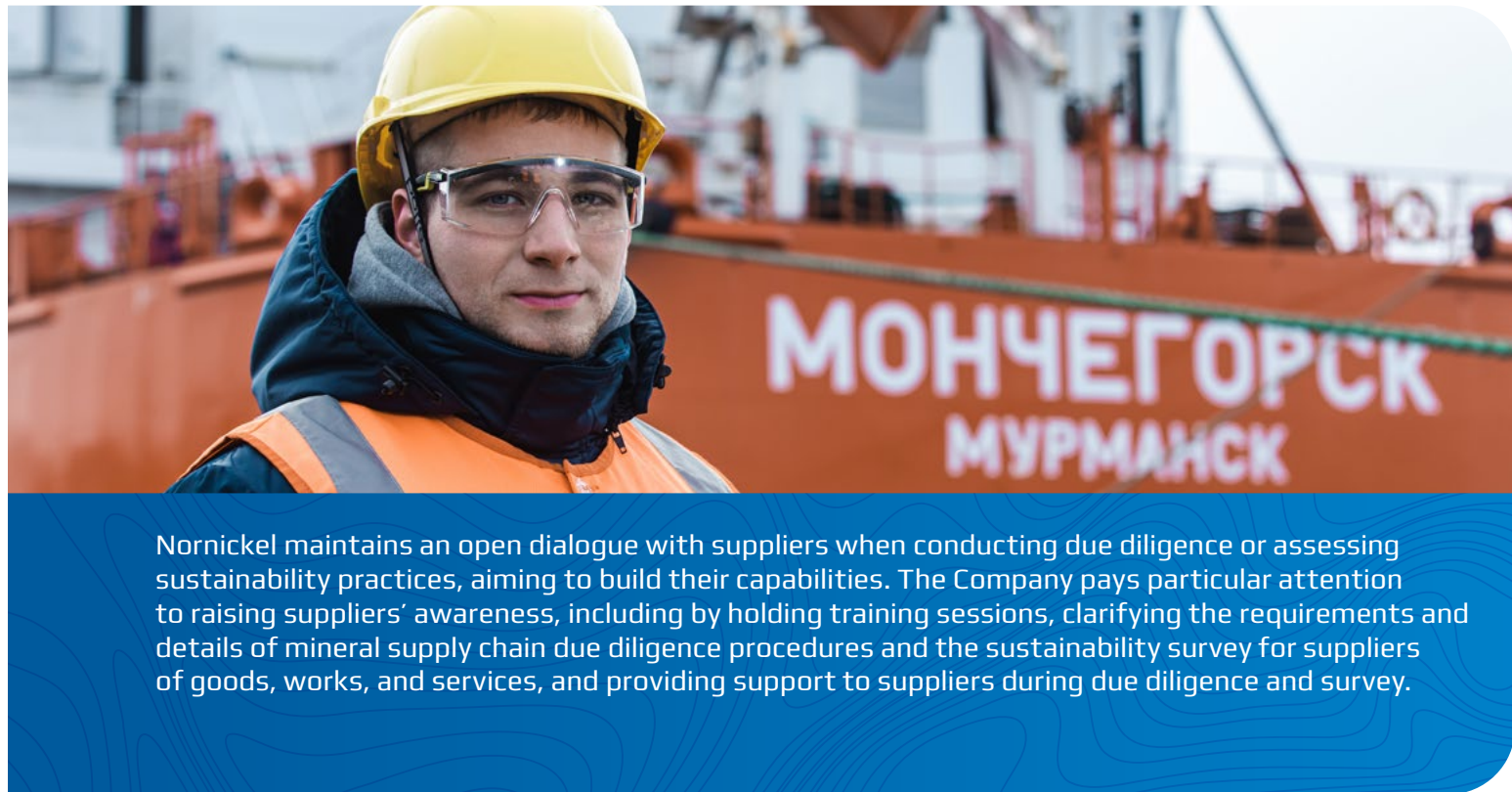
The Company has been conducting annual due diligence on mineral suppliers since 2021. In the reporting period, the exercise covered

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

0

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



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, Norinickel completed 20 pilot tests of equipment and materials, including 10 successful tests. Another five pilot tests are currently underway.

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.

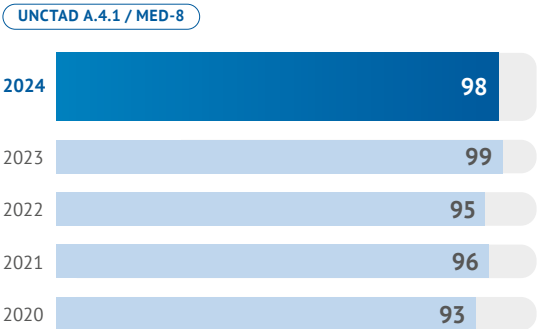
In addition, the Company website has a dedicated [Suppliers](#) section, containing key information about the Group's procurement principles and procedures and planned needs. The section also features a register of unreliable counterparties as well as announcements and invitations to participate in procurement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



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



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



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 Nor Nickel. 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. Nor Nickel'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, Nor Nickel 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 – NORICKEL PLATING GRADE and NORICKEL HIGH PURITY – for electroplating and superalloy production, and produced nickel sulphate at its Kola site.

Nor Nickel'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

Nor Nickel'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 Nor Nickel products.

The Company's sales strategy is focused on securing a stable position in the market. Nor Nickel 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.

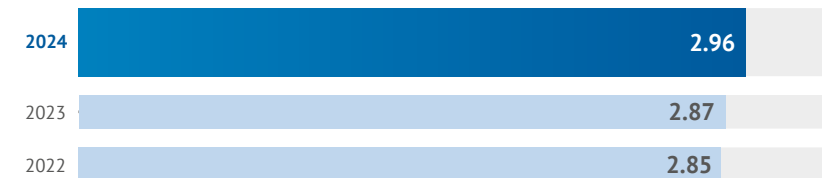
Throughout the history of Nor Nickel, it has never failed to meet its obligations to deliver products to consumers.

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

Nor Nickel 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 Nor Nickel's robust performance. Each year, Nor Nickel 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.