

Contribution to upholding the rights of supplier employees

CHRB B.1.4.b, B.1.7

The Company has in place the Supplier Code of Conduct of PJSC MMC Norilsk Nickel and Responsible Sourcing Policy of PJSC MMC Norilsk Nickel, setting out Nornickel's approach to environmental, social, and corporate governance issues throughout its supply chain. The documents set out the principles and commitments that the Company's suppliers are expected to follow in their operations, including a zero-tolerance approach to human rights violations.

Such violations include:

Any forms of torture, cruel, inhuman, and degrading treatment

Other gross human rights violations and abuses such as widespread sexual violence

Any forms of forced or compulsory labour

War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide

The worst forms of child labour



Standard forms of agreements and contracts, as well as the General Contracting Terms and Conditions with suppliers, were amended to include a clause requiring compliance with the requirements listed in PJSC MMC Norilsk Nickel's Supplier Code of Conduct. This paragraph also informs providers about:

- the need to recognise and commit to generally accepted principles in human rights, labour relations, environmental protection, and anti-corruption, as stipulated by international regulations, and in particular, the UN Global Compact;
- the opportunity to report to Nornickel's Corporate Trust Line, which is the Company's principal grievance mechanism.

For more details, please see the Remedies and Grievance Mechanisms section.

As part of responsible supply chain management, Nornickel conducts annual due diligence on 100% of its suppliers, processors, and transporters of minerals, with human rights risks assessed using the OECD Guidance. Where such risks are identified and verified through audits, a corrective action plan is put in place. Should the risk escalate to a level deemed unacceptable, the contractual relationship with the supplier may be reconsidered. No relevant risks were confirmed under this system of audits from 2021 through the end of 2024.

UNGPs RF A2.3

The Company interacts with suppliers, including through training sessions and consultations, to raise awareness of responsible supply chain practices and strengthen their preparedness for due diligence and sustainability assessments.

For more details on how Nornickel manages its responsible supply chain, please see Nornickel's 2024 Responsible Supply Chain Report.

Contacts and sources of information about the report

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- vk.com/nornickel\_official
- youtube.com/user/NornikOfficial
- rutube.ru/channel/24161124/

Corporate website

https://nornickel.com/

Human rights at Nornickel

https://www.nornickel.com/upload/files/ru/investors/reports-and-results/annual-reports/nn\_human\_rights\_2024-eng.pdf

Nornickel's by-laws

https://nornickel.com/investors/disclosure/corporate-documents/#corporate-codes-and-policies

Nornickel's 2024 Sustainability Report

https://www.nornickel.com/upload/files/ru/investors/reports-and-results/annual-reports/annual\_report\_of\_pjsc\_mmc\_norilsk\_nickel\_2024-eng.pdf

Nornickel's 2024 Responsible Supply Chain Report

https://www.nornickel.com/upload/files/ru/investors/reports-and-results/annual-reports/responsible\_supply\_chain\_report\_2024-eng.pdf

Nornickel's 2024 Climate Change Report

https://www.nornickel.com/upload/files/ru/investors/reports-and-results/annual-reports/climate\_change\_report\_2024-eng.pdf