



# RESPONSIBLE SUPPLY CHAIN REPORT BROCHURE

NORNICKEL GROUP  
2023



Nornickel Group<sup>1</sup> (“Nornickel” or the “Company”) is a leader of the Russian metals and mining industry, ranks No. 1 among the world’s producers of palladium and high-grade nickel, and is one of the major producers of platinum, copper, cobalt, and other metals globally.



The brochure contains an executive summary of the Company’s Responsible Supply Chain Report (the “Report”). [The Report](#) is available in Russian and English on the Company’s website.

Nornickel develops its responsible supply chains in accordance with its mission, which is to supply the world with non-ferrous metals, efficiently and safely using natural resources and equity. The development

of the responsible sourcing practice ensures compliance with responsible supply chain requirements and standards, including the LME and OECD Guidance, and customer requests.

## Summary of responsible supply chain results in 2023

- the Company’s Board of Directors approved the Company’s Sustainable Social Development Strategy, with an objective to ensure supply chain transparency in terms of social criteria;
- due diligence checks were conducted on mineral suppliers of Norilsk Division and Kola MMC. No risks were identified in supply chains following the due diligence;
- a pilot assessment was held for sustainability practices of the largest suppliers of goods, works and services for compliance with the requirements [PJSC MMC Norilsk Nickel’s Supplier Code of Conduct](#) (the “Code”).

<sup>1</sup> Nornickel Group includes PJSC MMC Norilsk Nickel and its subsidiaries.

<sup>2</sup> Norilsk Division includes inter alia Polar Subdivision of PJSC MMC Norilsk Nickel (“Polar Division”) and Medvezhy Ruchey LLC.

## Approach to managing a responsible supply chain

In 2021, the Board of Directors approved the corporate documents describing the key principles of responsible supply chain management:



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



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

The Company relies on a systemic approach to supply chain management, which includes the following

1

Monitoring of requirements and best practices for a responsible supply chain

2

Development of corporate responsible supply chain documents and management systems

3

Supply chain analysis and assessing supplier compliance with the Company’s requirements

4

Interaction with suppliers, in particular as part of due diligence and assessment of supplier sustainability practices

5

Responsible supply chain disclosure

For the purpose of managing its responsible supply chain, Nornickel divides its suppliers into two categories.



Mineral suppliers<sup>1</sup>



Suppliers of goods, works and services<sup>2</sup>



## Responsible mineral supply chain

The Company has a supply chain Due Diligence Management System (the "System"), which sets out the procedure of mineral suppliers due diligence against risks related to the supply of minerals from conflict areas, human rights violations, money laundering, fraud, and corrupt practices.

➔ A detailed overview of the System and supplier due diligence results can be found in section 1 of the Report.

The System aims to ensure and monitor mineral suppliers' compliance with Nornickel's corporate standards and the applicable international standards and initiatives.

In 2021, the System was deployed at Kola MMC and rolled out in 2022 to Polar Division and Bystrinsky GOK. In Q4 2023, the System was integrated into the practices of Medvezhy Ruchey LLC.

<sup>1</sup> The Company's mineral suppliers include suppliers of mined minerals (primary processed material which has never been previously refined) and suppliers providing minerals transportation, their processing and loading/unloading services. For the purpose of this document, minerals mean mineral raw materials containing nickel, cobalt, and copper.

<sup>2</sup> Suppliers of goods, works and services include all of the Company's supplier categories.

## Responsible supply chain for goods, works and services

In 2023, Nornickel established its approach to assessing sustainability practices of suppliers of goods, works and services, which is based on sustainability principles described in the Code. The assessment process envisages a survey and includes analysis and assessment of the supplier operations' ESG component.

The key purpose of the survey is to assess the suppliers' compliance with the Company's corporate environmental, social and governance standards (ESG maturity).

### Overall ESG maturity of suppliers



According to the pilot assessment, the overall compliance level of suppliers' ESG practices against the requirements set out in the questionnaire is

**68%**

Most of the surveyed suppliers are private companies. Even though there are no mandatory requirements for such companies to make non-financial disclosures, survey results confirm their fairly high ESG maturity.

➔ The approach to sustainability surveys of suppliers of goods, works and services is described in more detail in section 2 of the Report, along with the findings of the pilot survey.

## Training

**In 2023, responsible supply chain trainings were attended by both the Company's employees and its suppliers.**

Nornnickel focuses on raising its suppliers' awareness of sustainable development and the responsible supply chain, and holds training sessions in this area. The training sessions aim to foster knowledge of the Company's internal

policies and processes, and also of updates in the requirements of regulators and standards. Nornnickel's employees also regularly attend trainings on responsible sourcing.

The total number of participants trained exceeded

**>380**

The total number of responsible supply chain training hours amounted to

**2,236**



## Corporate Trust Line



In 2010, Nornickel set up its [Corporate Trust Line](#) (the "CTL"), which handles stakeholder reports on violations of law and the Company's corporate policies.

Issues may be reported anonymously and must be treated in such a way as to assure confidentiality, objectivity and impartiality, and to prevent retaliation against whistle-blowers.

In 2023, the CTL received 113 reports related to responsible sourcing from contractor and subcontractor employees. For all the reports containing confirmed violations, corrective actions were carried out to remedy the situation and eliminate negative consequences.

Responsible supply chain management enables Nornickel to promote the sustainability agenda among its suppliers, to encourage their compliance with the respective corporate standards, and to manage the associated risks and increase the level of trust in business.



