



Procurement and responsible supply chain

Management approach

Nornickel takes a responsible approach to working with suppliers and customers for its products, making sure that its partners comply with applicable laws and regulations, ensure safe working conditions, and are passionate about caring for the environment. The Company expects its counterparties to comply with international and Russian best practices in sustainability and responsible supply chain management (RSCM).

The following key documents guide procurement and responsible supply chain management at Nornickel:

- [Supplier Code of Conduct](#)
- [Responsible Sourcing Policy](#)
- [Business Ethics Code](#)
- [Human Rights Policy](#)
- [Policy on Managing the Health and Safety of Contractors](#)
- Internal corporate procurement standards

To mitigate operational and financial risks and costs as well as improve supply reliability and cadence, the Company applies procurement policies. At the end of 2025, there were 52 category procurement policies in place, four of which were updated during the year.

The Company has also implemented a Procurement Excellence Programme approved for 2025, aimed at:

- optimising the costs of inventory, works, and services (zero inflation);
- meeting working capital targets in terms of inventory reduction;
- increasing supplier competition;
- increasing transparency and strengthening control of procurement procedures.



Procurement

Nornickel engages with suppliers via open tender procedures. Nornickel's procurement system focuses on timely and fully meeting the Company's needs for required materials and services of specified quality and at an acceptable price.

standards of fair competition and the principles of avoiding conflicts of interest. To maximise procurement effectiveness and transparency, the Company's procurement activities are mostly centralised at its Head Office through automated systems and electronic trading platforms.

As the Company aims to work with reliable suppliers meeting their obligations regarding delivery dates and the quantity and quality of products supplied, during the procurement procedure, all suppliers undergo mandatory qualification screening against formalised criteria and rules.

Procurement process

Nornickel's procurement process is certified to ISO 9001, ISO 14001 and ISO 45001. Supplier performance evaluation procedures have also been developed taking these standards into account. A heightened emphasis is placed on building relationships with suppliers whose equipment is unique and critical for the stable operation of the Group's production facilities.

Depending on the budgeted cost, procurement can follow a tendering, simple, or simplified procedure. Based on the materiality and parameters of purchases, the qualification results and the winning bidder in the procurement process are approved by the collective procurement body composed of representatives from various functions of Nornickel. The contract with the winning bidder is signed in accordance with the approved results of the procurement procedure. All of the Group's centralised procurement transactions are detailed on the [Company website](#).

Nornickel gives preference to local suppliers to provide social support to its operating regions. Along with saving jobs, this policy supports unique enterprises whose continuous operation is essential to both the well-being of their employees and the wider social fabric of local communities.

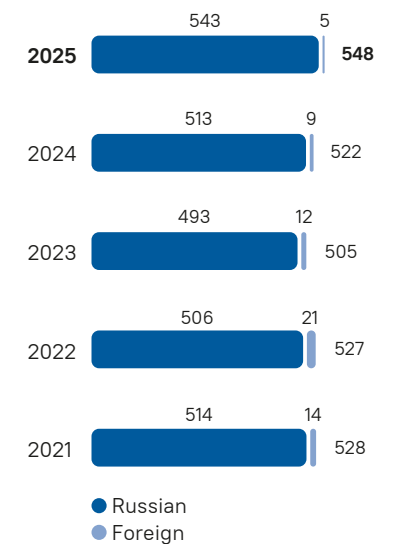
The Company procures over 40 aggregated purchasing categories, from heavy industrial equipment to food. In doing so, Nornickel provides equal competitive opportunities for large, medium, and small businesses alike, guided by generally accepted

In 2025, procurement by collective bodies of the Head Office (tender committee, tender commissions) totalled about RUB 133 billion.

Nornickel has in place the [Corporate Trust Line](#) that can be used by any stakeholder to report any violations.



Supplier companies in centralised procurement





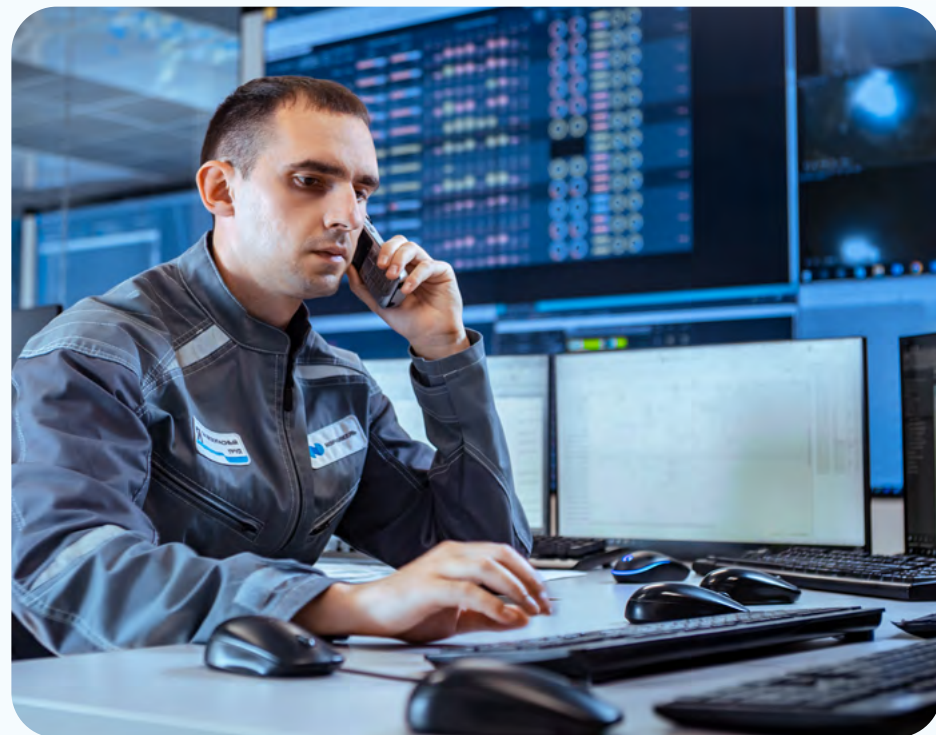
Supplier engagement

Sign-up for Nornickel's procurement management system is free of charge and does not impose any obligations on users.

One of the channels used by the Company to interact with suppliers is the Suppliers section on its website, containing key information on the procurement principles and procedures, planned needs as well as announcements and invitations to participate in tenders.

Nornickel procurement specialists are active members of the professional community in their respective purchasing categories, attending industry exhibitions and participating in conferences.

Efficient and convenient communications with suppliers at Nornickel are enabled through its procurement management system that gives suppliers anytime access to information about the Company's procurement procedures. In 2025, 1,801 suppliers were added to the system, with more than 15.5 thousand suppliers accredited in total as at year-end. The Company also engages with original equipment manufacturers (OEMs) to accredit them on this e-platform.



One of the Company's priorities in driving supplier engagement is to provide robust feedback mechanisms, which are also implemented, improved, and enhanced in the supplier's personal account in the procurement management system. Designed for communicating with counterparties during contract execution, the system is continuously improved to optimise and boost performance for all users. Suppliers can get updates on Nornickel's procurement procedures and opportunities by communicating online with procurement teams in all product categories in Nornickel's procurement management system.

In their personal accounts, counterparties can manage the documents generated for contract purposes, track work stages, and exchange files and instant messages with contract managers to request clarifications and accelerate

communication. The service helps to keep suppliers better informed about contract execution progress while also ensuring transparency of transactions and significantly speeding up daily communication between the parties. All supply terms and conditions are specified in the contracts or agreements signed with suppliers.

The supplier's personal account also enables sign-up for other services, such as electronic document management, factoring, and dynamic discounting, forging a wider partnership.

Nornickel is also working on expanding and supplementing the list of services and consolidating them in the personal account to develop relationships with counterparties.

In addition, the Company has implemented and is operating an electronic document management solution for suppliers to speed up mutual settlements and add transparency to the process.

Nornickel seeks to create a common information space and set of values with its counterparties. The Company employs a proprietary multi-tier system to evaluate its suppliers.

The corporate Responsible Sourcing Policy in place sets out Nornickel's approach to promoting ESG throughout the supply chain.

In addition to the Policy, Nornickel maintains the Supplier Code of Conduct, which sets out its approach to ensuring suppliers' compliance with sustainability principles. Several provisions of the Code further reinforce the requirements of Russian laws establishing mandatory standards comparable to stakeholder requirements regarding responsible supply chain management.

If a counterparty faces difficulties signing up or using the system, they can seek help and advice:

- via e-mail suppliers@nornik.ru
- or by phone at:
 - +7 495 783 0045 ext. 6 (for calls within Moscow);
 - 8 800 700 5911 ext. 6 (toll-free federal number).



In these documents, Nornickel affirms that modern slavery, child labour, and forced labour are unacceptable in its operations and across its supply chain.

Provisions of the Policy and the Code are incorporated into supplier contracts: standard forms of contracts and master agreements as well as General Contracting Terms and Conditions were amended to include a clause with a requirement to comply with the Company's sustainability requirements listed in the Code. This clause also informs suppliers of the opportunity to report concerns to the Corporate Trust Line, which is Nornickel's principal grievance mechanism.

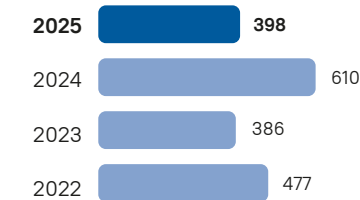
The Company has developed and launched an online course on responsible supply chain management on the Nornickel Academy internal platform. More than 390 people completed the course in the reporting period.¹

The Company pays particular attention to raising suppliers' awareness of responsible supply chain management. As part of its engagement with suppliers, the Company holds meetings to explain Nornickel's RSCM requirements and details of supply chain due diligence procedures and sustainability assessments.

Responsible mineral supply chain

The Company has in place a Mineral Supply Chain Due Diligence Management System (DDMS) focused on identifying potential risks affecting the sustainability of business processes in the mineral supply chain while also minimising risks relating to human rights, money laundering, fraud, corruption, and misinformation about minerals.

Employees trained on responsible supply chain, people



¹ The training also covers employees of internal mineral suppliers that are part of the Group.



The DDMS is driven by the following requirements and recommendations:

- Responsible Sourcing Policy and Supplier Code of Conduct
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- LME's responsible sourcing requirements
- Standards of leading industry-specific and sustainability initiatives: RMI¹ / JDDS,² RCI,³ CCCMC,⁴ IRMA,⁵ ICMM,⁶ and CMSI⁷
- Requirements of the Company's customers

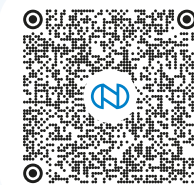
Responsible supply chain for goods, works, and services

The Company performs an annual assessment of its suppliers providing goods, works, and services, based on sustainability criteria. The assessment, conducted through a questionnaire survey, verifies the compliance of suppliers' sustainability practices with the Code requirements. The Company uses the results to identify areas for improvement in supplier RSCM activities. The supplier self-assessment questionnaire (SSAQ) is divided into E (Environmental), S (Social), and G (Governance) sections.

Since the launch of the assessment process, the Company has been consistently expanding the supplier sample: in the reporting period, the survey covered 44% of the Group's purchases (vs 35% in 2024).⁹ According to the survey findings, the average level of suppliers' compliance with the requirements as set out in the questionnaire is 44%. The results indicate a sufficient level of maturity in suppliers' sustainability practices, considering the SSAQ's stronger focus on the practical implementation of sustainability and responsible supply chain management.

The results of the 2024 and 2025 surveys are not fully comparable, as the composition of the supplier sample changes from year to year.

The Company's plans and progress in responsible supply chain management are further detailed in the [Responsible Supply Chain Report](#), which has been published annually since 2023.



For more details see the [Responsible Supply Chain Report](#)

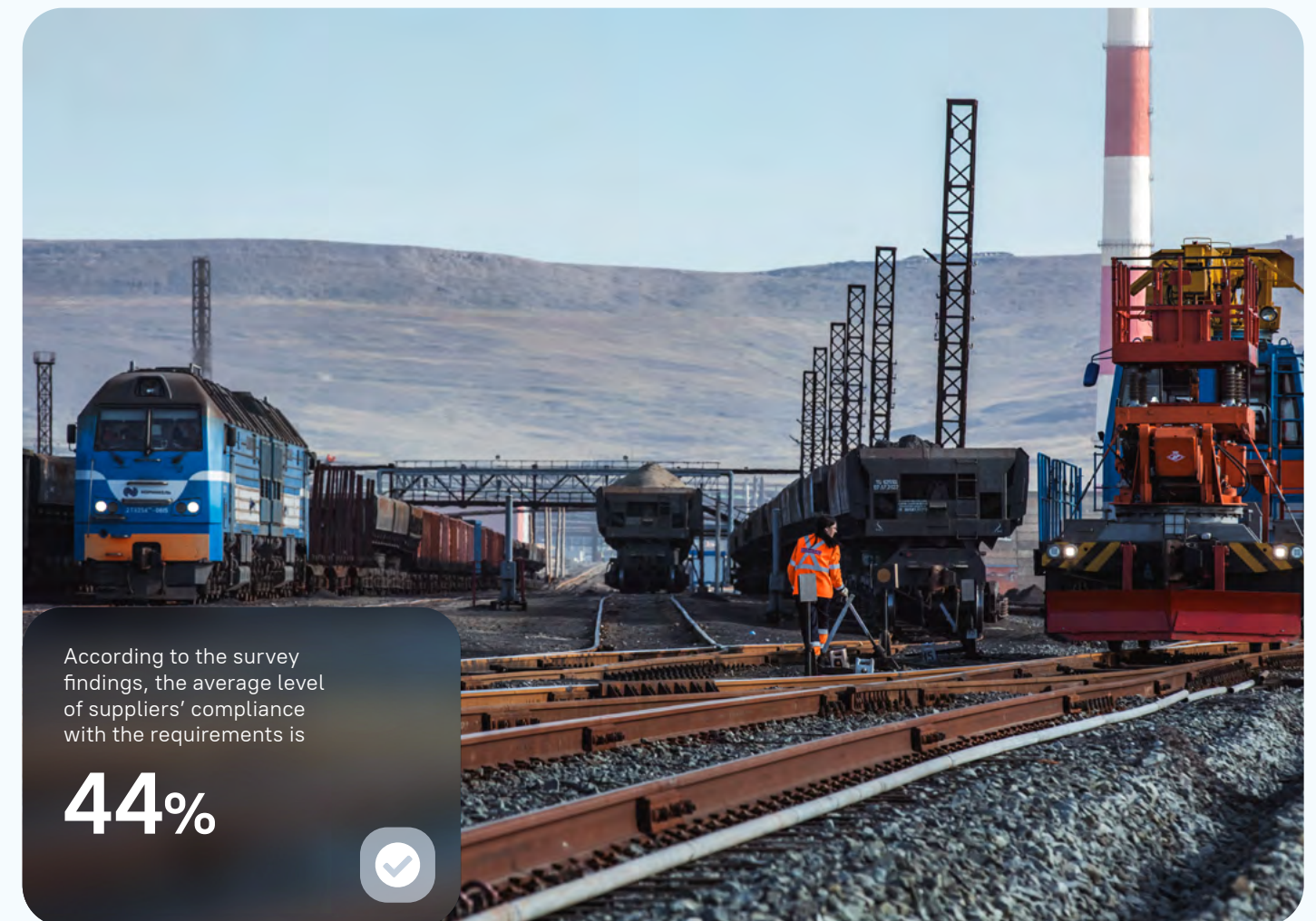
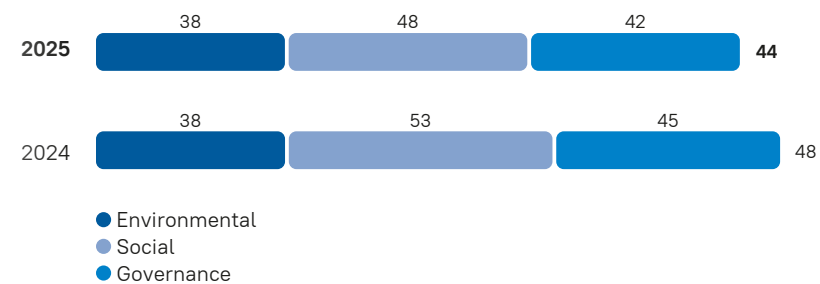
Given the risk of potential negative environmental impact of cargo in transit, the Company's master agreement sets explicit requirements for cargo packaging. Goods to be shipped must meet the cargo standards and requirements of GOST 26653-2015 Preparation of general cargoes for transportation and GOST 15846-2002 Production for transportation to the areas of the Far North and similar regions. Packaging, labelling, transportation, and storage. Mandatory requirements are established for the transport containers and product packaging that should ensure cargo integrity during multiple transshipments and transportation to the Far North.

Environmental impact is assessed throughout the life cycle of procured products: production, transportation, storage, use, and disposal. Nornickel requires its counterparties to have a functioning environmental management system in place and to ensure that all services and products delivered by them comply with local environmental laws.

In 2025, the Company conducted due diligence covering 100% of mineral suppliers⁸ at the Norilsk and Kola sites, identifying no supply chain risks.



Suppliers' compliance with the requirements as set out in the self-assessment questionnaire, %



According to the survey findings, the average level of suppliers' compliance with the requirements is

44%



¹ Responsible Minerals Initiative.
² Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc, developed by international copper, lead, and zinc associations, the Nickel Institute, and the Responsible Minerals Initiative.
³ Responsible Cobalt Initiative.
⁴ China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters.
⁵ Initiative for Responsible Mining Assurance.
⁶ International Council on Mining and Metals.
⁷ Consolidated Mining Standards Initiative.
⁸ Mineral suppliers include suppliers of mined minerals (primary processed material that has never been previously refined) and suppliers providing minerals transportation, processing, and loading/unloading services. "Minerals" are minerals containing nickel, cobalt, and copper.
⁹ The sample includes the largest external suppliers (those outside the Group) of the Group's Russian assets in terms of payment amounts in the year preceding the year when the survey takes place.