



**NORNICKEL**

**APPROVED**

**By resolution of the Board of Directors  
of PJSC MMC Norilsk Nickel**

(passed on 07.10.2021 No. GMK\30-pr-sd)

**SUPPLIER CODE OF CONDUCT  
PJSC MMC Norilsk Nickel**

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## 1. Objective

PJSC MMC Norilsk Nickel (the "Company") implements responsible sourcing practices in its supply chains and abides by the undertakings set out in the Company's Responsible Sourcing Policy (the "Policy") as well as other Company policies related to environmental, social and governance ("ESG") matters and the Business Ethics Code of PJSC MMC Norilsk Nickel.

The Company's Supplier Code of Conduct (the "Code") applies to all business units that are part of Norilsk Nickel Group (jointly referred to as "Nornickel") in which the Company, directly or indirectly, holds more than 50% of the authorised capital, subject to the restrictions and requirements of the applicable law.

To ensure ESG-compliant sourcing across Nornickel's supply chains, suppliers are required to adhere to the Code. Moreover, Nornickel expects its suppliers to adhere to the principles set out in the Policy and to comply with the requirements of the applicable laws and regulations, general principles, international laws and international treaties, including the ones listed in Clause 8.2 hereof.

The Code is comprised of four chapters covering Nornickel's supplier requirements relating to:

- Responsible sourcing of raw materials;
- Environment;
- Human rights, labour rights and health & safety;
- Corporate governance.

The Code includes a chapter on implementation guidance for suppliers as well as a reference to the established grievance mechanism that can be used by suppliers to report violations or concerns pertaining to the Code.

Depending on the significance and priority of the suppliers' compliance, the Code's requirements are subdivided into the following provisional categories:

a) Nornickel's **mandatory requirements**, compliance with which is the most important and highest priority for suppliers. The suppliers must also ensure their suppliers, contractors and subcontractors comply with the mandatory requirements. These requirements are phrased in the Code using the word "must".

b) Nornickel's **target requirements**, which the suppliers should observe taking into account the priority of mandatory requirements. These requirements are phrased in the Code using the word "should".

c) Nornickel's **expectations**, which the suppliers should observe taking into account the priority of mandatory and target requirements. These requirements are phrased in the Code using the word "should aim to".

Nornickel conducts regular assessments of suppliers' conformance with the requirements set out in the Code, which may include audits of supplier sites.

If the Suppliers refuse to follow the Code's requirements or do not exhibit continuous improvement with respect to such compliance, Nornickel may review its relations with such suppliers.

Assessments will be performed annually, or as significant changes in the relevant supply chain occur. As part of the assessment, Nornickel or an independent company

commissioned directly by Nornickel will conduct an audit of ESG risks in the supply chain and audits of production facilities (refiners, smelters, processing units and mines) for suppliers of the relevant categories. Nornickel determines the frequency of the Suppliers' compliance assessment and appoints the officers responsible for such an assessment in line with the documents adopted within the framework of the performance hereof.

## **2. Scope**

The Code applies to all of Nornickel's suppliers, contractors and subcontractors (the "Suppliers") in the supply chain of raw materials<sup>1</sup>, goods, works and services in accordance with the terms and conditions of the agreements concluded with the Suppliers, or under other documents adopted in pursuance of this Code.

Nornickel may require the Suppliers to provide evidence of their conformance with the Code and such evidence must be provided on request. Nornickel is committed to engaging with its Suppliers on ESG-related matters in an open and transparent way to promote responsible sourcing practices and to address potential barriers. To achieve this, Nornickel provides Implementation Guidance to its Suppliers as set out in Chapter 6.

## **3. General information**

The Policy and Nornickel's Due Diligence Management System (DDMS) are modelled on international good practice guidance and standards such as the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance") and the OECD Five-Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain. Nornickel is committed to continuously meeting customer, industry and stakeholder expectations with regards to responsible sourcing and to promoting ESG requirements across its supply chains.

Compliance with the Code forms an integral part of Nornickel's commitment to responsible sourcing. The requirements contained herein are fundamental principles of ethical and sustainable business practices. Suppliers are expected to implement the documents specified in Section 8 hereof and comply with the requirements of key industry standards and general market expectations with regards to ESG and responsible sourcing.

## **4. Regulatory framework**

Nornickel's supplier requirements are based on responsible sourcing standards, initiatives and frameworks in addition to the legal and regulatory requirements of the Russian Federation and applicable international laws and conventions, including those specified in clause 8.2 hereof.

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<sup>1</sup> The process of bringing a raw mineral to the consumer market involves multiple actors and generally includes the extraction, transport, handling, trading, processing, smelting, refining and alloying, manufacturing and sale of end product. The term supply chain refers to the system of all the activities, organisations, actors, technology, information, resources and services involved in moving the mineral from the extraction site downstream to its incorporation in the final product for end consumers. (source: OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas).

## 5. Supplier requirements

### 5.1. Responsible sourcing

Suppliers of raw materials **must** take effective and adequate action to address Annex II risks of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance") incorporating the following:

Step 1. Establish strong corporate management systems for supply chain due diligence, which includes adopting and communicating to the public a responsible sourcing policy aligned with the OECD Guidance; structuring internal management to support supply chain due diligence; establishing a system of controls and transparency over the supply chain, including the identification of upstream suppliers; establish a company-level or industry-wide grievance mechanism enabling any affected stakeholder to raise concerns regarding the circumstances of extraction, trade, handling and export of natural resources.

Step 2. Identify and assess risks in the supply chain, including the mapping of the factual circumstances of the supply chain such as the origin of raw materials and the activities of suppliers and how suppliers are connected in the respective network of supply chain tiers.

Step 3: Design and implement a strategy to respond to identified risks, including risk mitigation plans

Step 4: Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain.

Step 5: Publicly report on supply chain due diligence policies and practices, results of supply chain risk assessments and steps taken to manage risks<sup>2</sup> with due regard to business confidentiality. If a supplier is based in an EITI country, it should report on conformance with EITI requirements in that country and, where relevant, provide a link to the latest EITI report, or the company's relevant submission for the purpose of EITI reporting. If the supplier is in a country that is not an EITI member, it should disclose information on steps taken to provide transparency on payments and other matters in line with the aims of EITI.

Nornickel reserves the right to request disclosures on supply chain risks from its suppliers.

Suppliers **should** expand the risk scope of their due diligence management system beyond Annex II of the OECD Guidance to consider the full ESG-related risk spectrum.

Suppliers should **aim to** ensure that their mine tier suppliers undergo independent third-party certifications, such as by the Initiative for Responsible Mining Assurance (IRMA) or equivalent.

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<sup>2</sup> ESG risk management (risk management process) is a continuous process that includes identification, analysis, assessment and/or prioritisation of risks, as well as planning and execution of risk response plans, development and implementation of risk management measures, control over the execution of action plans and monitoring (assessment) of the effectiveness of the risk management process in environmental, social responsibility and corporate governance.

## 5.2. Environment

Suppliers **should** implement effective and adequate environmental policies and procedures in line with international standards, including that of the International Council on Mining and Metals (ICMM) and IRMA, where applicable.

### 5.2.1. Environmental management

Suppliers **must** comply with all applicable environmental laws and regulations and obtain all required certification, permits, licenses and or approvals. Suppliers **must** implement effective and adequate policies and management systems to proactively monitor, reduce and prevent negative impacts from their operations on the environment, including air, water and soil.

Suppliers **should** certify their environmental management systems according to ISO 14001:2018 or an equivalent standard.

The environmental policies, procedures and management systems of suppliers **should** promote environmental responsibility within their own supply chains.

Suppliers should **aim to** support the development, application and diffusion of environmentally friendly technologies.

### 5.2.2. Energy efficiency

Suppliers **must** manage the energy used in their operations efficiently and responsibly. Suppliers **must** collect and report data on energy consumption as required by applicable laws and regulations and provide relevant data to Nornickel upon request to meet Nornickel's own reporting requirements.

Suppliers **should** use energy-efficient technologies as applicable. Suppliers **should** use renewable energy sources, preserve and, where possible, optimise their energy consumption and improve energy efficiency.

Suppliers should **aim to** assess their operations and identify opportunities for energy efficiency related modernisation projects to reduce their energy consumption and advance the transition to renewable energy sources.

### 5.2.3. Climate change and GHG emissions reduction

Suppliers **must** develop climate change-related risk assessments to design effective and robust policies and procedures and implement strategies to reduce greenhouse gas (GHG) emissions.

Suppliers' policies and procedures **should** inter alia set targets for achieving net zero emissions to meet the goals of the Paris Agreement and commit to regularly publishing their GHG emission reduction targets to report on their progress. Suppliers **should** calculate GHG emissions in line with the requirements of the Greenhouse Gas Protocol. Suppliers **should** implement a methodology for life cycle assessment (LCA) of the carbon footprint of their products supplied to Nornickel and provide relevant data to Nornickel upon request verified by an internationally recognised third party acceptable to Nornickel.

Suppliers should **aim to** support scientific research and relevant governmental and non-governmental organisations to monitor GHG emission impacts in areas of their operations. Suppliers should **aim to** disclose financial information in line with the Task Force on Climate-related Financial Disclosures (TCFD).

#### 5.2.4. Biodiversity

Suppliers **must** minimise negative impacts on biodiversity through their operations.

Suppliers operating in protected areas of high biodiversity importance **should** develop and publish a biodiversity impact and action plan (or any other document describing a scope of measures and approaches to conserve biodiversity). Suppliers **should** carry out comprehensive reviews of their operations to assess potential negative impacts on biodiversity. Suppliers located or operating in areas of high biodiversity significance **should** develop and implement a biodiversity impact monitoring process as well as an action plan and report on the outcomes (if applicable).

Suppliers should **aim to** engage with organisations that are active in biodiversity conservation and participate in programmes focused on preserving and improving the protection of local biodiversity.

#### 5.2.5. Tailings and waste

Suppliers **must** implement appropriate waste handling management processes, including waste reduction and minimising negative impacts on the environment and local communities, where applicable. Suppliers **must** ensure safe tailings management throughout the full life cycle and take all necessary steps to avoid accidents, including risk assessment and regular audits.

Suppliers **should** implement effective and adequate tailings and waste management policies and procedures in line with the Global Industry Standard on Tailings Management. Suppliers **should** promote the reuse and recycling of materials and packing.

Suppliers should **aim to** continuously improve their tailings and waste management processes by using the technological tools available.

#### 5.2.6. Water stewardship

Suppliers **must** use water resources efficiently and sustainably and reduce negative impacts on water through their operations. Suppliers **must** avoid using water resources in regions with water scarcity.

Suppliers should develop and implement a water risk management approach and publicly communicate their commitments to water stewardship. Suppliers **should** raise awareness and provide training to their employees to promote education on water stewardship.

Suppliers should **aim to** engage with relevant government and non-governmental organisations to advance integrated and effective water management governance.

### 5.3. Human rights, labour rights and health & safety

#### 5.3.1. Human rights

Suppliers **must** prevent human rights abuses or violations in their businesses and across their supply chains.

##### 5.3.1.1. Serious human rights abuses

Suppliers **must** prevent any forms for serious human rights abuses or violations, including torture and cruel, inhuman or degrading treatment, sexualised violence or

harassment, war crimes or other serious violations of international humanitarian law, crimes against humanity or genocide. Suppliers **must** have effective and adequate policies in place to demonstrate their commitment to respecting human rights and human rights defenders and to conduct human rights due diligence across their supply chains to assess and mitigate potential serious human rights abuses or violations, and appropriately record these actions. Suppliers **must** implement processes to remedy adverse impacts on human rights resulting from their operation or contribution. Suppliers **must** ensure that they do not support or finance, directly or indirectly, armed groups and/or local conflicts in conflict-affected and high-risk areas. Suppliers **must** raise awareness and provide training to their employees and relevant external stakeholders to eliminate serious human rights abuses within their operations and the local communities. Suppliers **must** implement an effective grievance mechanism available to internal and external stakeholders to report human rights violations on a confidential and, if chosen, anonymous basis without fear of retaliation.

Suppliers **should** suspend or terminate, depending on the outcomes of mitigating actions taken, engagement with their Suppliers if they are found to be in violation of this requirement. Suppliers **should** support relevant international standards and organisations and publicly communicate that they do not tolerate serious human rights abuses in their operations or supply chain.

Suppliers should **aim to** support capacity-building and collaborative educational initiatives within their industry to prevent serious human rights abuses.

#### **5.3.1.2. Security and human rights**

Suppliers **must** ensure that any engagement of security forces is in line with the Voluntary Principles on Security and Human Rights. Suppliers **must** review and monitor public or private security forces engaged in their operations to ensure that they have not been and are not implicated in or responsible for serious human rights abuses or violations.

Suppliers **should** publicly commit to the Voluntary Principles on Security and Human Rights. Suppliers **should** implement effective and adequate risk assessments to identify, assess and mitigate potential security risks for the employees and local communities with respect to their operations. Suppliers **should** engage with representatives of relevant civil society, government or international organisations to minimise or avoid negative impacts associated with the presence of security forces on mine sites related to their operations.

Suppliers should **aim to** collaborate with communities in their areas of operation that were previously affected by violence committed by security forces and take the necessary steps to prevent repeated occurrence.

#### **5.3.1.3. Modern slavery**

Suppliers **must** prevent any form of forced labour, human trafficking or modern slavery, defined by the International Labour Organisation as "all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily", in their operations as well as their own supply chains. Suppliers **must** have effective and adequate policies and procedures in place and conduct human rights due diligence to identify, assess and mitigate forced labour, human trafficking and modern slavery risks. Suppliers **must** ensure that their employees do not pay any fees, costs or expenses related to their employment and can freely leave

and enter relevant company facilities. Suppliers **must** ensure that employees understand the terms of their employment, this includes providing the terms of employment in the required language, which they are free to terminate. Suppliers **must** ensure that none of their workers are coerced to work by the use of violence or intimidation, debt bondage, threats of denunciation to immigration authorities or retention of wages or identity papers. Suppliers **must** also regularly review any recruitment agencies and labour brokers they may use to confirm conformance with applicable laws and ethical recruitment practices as outlined in this section.

To identify potential risks within their own operations, suppliers **should** proactively engage with vulnerable employee groups and create open communication channels encouraging their staff to report concerns through appropriate mechanisms.

Suppliers should **aim to** engage with relevant government bodies and non-governmental organisations to promote ethical and transparent recruitment practices and assist local and global efforts in eliminating modern slavery and human trafficking.

#### **5.3.1.4. Child labour**

Suppliers **must** prevent child labour in their operations as well as their own supply chains. Suppliers **must** take necessary steps to prevent the employment of:

- workers under the legal age to enable them to finish compulsory education;
- workers under 18 years of age for night shifts, overtime or employment or work that may be hazardous for health, safety or morals, or under applicable legal requirements, whichever is higher, if they do not contradict national laws.

Suppliers **must** ensure that the length of the working day (shift) for workers under 18 years of age does not exceed the limits prescribed by the labour laws. In the event that Suppliers identify child labour in their operations, they **must** take corrective actions in the child's best interest. Suppliers **must** have effective and adequate policies and procedures in place to prevent child labour in their own operations and their supply chains.

Suppliers **should** protect children's development, health and safety by providing tailored training to its employees on issues associated with child labour and the rights of legally employed young workers.

Suppliers should **aim to** support children's rights and the abolition of child labour through engagement with relevant governmental and non-governmental organisations.

#### **5.3.2. Labour rights**

##### **5.3.2.1. Freedom of association**

Suppliers **must** guarantee their employees the right to join a trade union, the right to strike and the right to representation through a trade union in collective bargaining or, where trade unions rights are limited, provide workers with alternative representation mechanisms. Suppliers **must** also make every effort to provide their trade unions or alternative representation mechanisms with the necessary premises, facilities, equipment and communication channels they require to perform their functions. Suppliers **must** seek to reach collective bargaining agreements in good faith and without undue delays.

Suppliers **should** publicly disclose the proportion of employees that are covered by a collective bargaining agreement.

Suppliers that operate in a country where freedom of association is limited by law should **aim to** engage with the relevant authorities to encourage worker representation.

#### **5.3.2.2. Working conditions**

Working hours, wages, overtime payments, leave and benefits for all employees, including student workers and interns, **must** meet or exceed legal requirements and be paid on time. Suppliers **must** provide their employees with safe, maintained and appropriate accommodation, access to water and any other reasonably necessary or legally required facilities.

Suppliers **should** provide accommodation and facilities for their workers, including private lactation rooms, as part of supporting labour activities for the duration of works in cases stipulated by the applicable laws. Suppliers **should** carry out regular assessments of wages paid to ensure they allow for a decent living standard. Suppliers **should** ensure an open and safe environment for employees to discuss their working conditions with management.

Suppliers should **aim to** publish information on its remuneration structure and incentive systems on a regular basis.

#### **5.3.2.3. Equal opportunities**

In their operations and in their supply chains, suppliers **must** prohibit any discrimination or persecution on the basis of gender, sexual orientation, union activity, political views, religion, age, social status, cultural background, ethnicity, nationality, education or disability. Suppliers **must** also prohibit all physical, verbal or sexual abuse, or threats thereof, or any other types of harassment, including psychological.

Suppliers **should** implement effective and adequate human resources policies and procedures to prevent discrimination and harassment and ensure fair and transparent recruitment practices in their own operations and their supply chain. Suppliers **should** implement compensation models that reflect equal pay for equal work. All disciplinary incidents and measures taken **should** be documented.

Suppliers should aim to support their employees in their career progression through training and professional development opportunities.

#### **5.3.3. Local communities**

##### **5.3.3.1. Indigenous rights**

Suppliers **must** treat local and indigenous communities and lands with respect and dignity, help preserve indigenous traditions and support indigenous practices of using natural resources as well as the use and restoration of renewable biological resources, recognise and apply the process of free, prior and informed consent of indigenous peoples before implementing any project in the territories of traditional living and economic activities of local indigenous groups. Suppliers **must** prevent the involuntary resettlement of local communities and any unlawful use of land, forests and waters. Suppliers **must** promote work and trade opportunities for indigenous people to improve living standards. Suppliers **must** implement effective remediation processes where local communities have experienced negative impact through their operations.

Suppliers **should** develop a meaningful partnership with local and indigenous communities within the remit of their operations and engage in an ongoing dialogue to foster cooperation.

Suppliers should **aim to** implement an appropriate grievance mechanism allowing members of the indigenous community to report concerns or violations of applicable law or company policies.

#### **5.3.4. Health & safety**

Suppliers **must** create a safe and healthy workplace and working environment and protect the general public against any negative health and safety impact resulting from their operations. Suppliers **must** conduct risk assessments of occupational health and safety covering their employees and contractors, including specific threat and risk reviews for pregnant employees, and implement appropriate safety procedures and tracking tools designed to achieve zero workplace accidents. Suppliers **must** manage, handle and label hazardous substances appropriately and ensure product quality and safety as required by law. Employees must receive adequate personal protective equipment and have the right to stop carrying out tasks they believe could endanger their life or health. Suppliers **must** train employees on health and safety processes within their operations. Suppliers **must** certify their health and safety management system according to ISO 45001:2018 or equivalent.

Suppliers **should** raise awareness of health and safety, including mental health, among its staff and across their supply chains. Suppliers **should** report accidents and near accidents to inform their health and safety management systems.

Suppliers should **aim to** implement rehabilitation programmes for employees involved in workplace accidents or who are affected by occupational health issues.

### **5.4. Corporate governance**

#### **5.4.1. Anti-corruption, financial and tax crimes, sanctions compliance**

Suppliers **must** implement effective and adequate policies and procedures to comply with applicable laws and regulations relating to fraud, anti-corruption, anti-money laundering, tax crimes and combating the financing of terrorism. Suppliers **must** prohibit facilitation payments. Suppliers **must** conduct appropriate due diligence to identify, assess and mitigate any potential bribery or financial crime risks in their operations and commercial activities with their counterparties or third parties. Suppliers **must** implement guidelines regarding gifts and entertainment to prevent their employees from offering, accepting incentives, advantages, or anything of value that could unduly influence their decisions or those of their counterparties. Suppliers **must** prevent breaches of sanctions regimes in their jurisdictions.

Suppliers **should** raise the awareness of their relevant employees and provide them with the necessary anti-corruption training.

#### **5.4.2. Fair competition**

Suppliers **must** comply with relevant antitrust legislation. Suppliers **must** implement accessible and transparent procurement processes and systems. Suppliers **must** avoid price fixing and other unfree or unfair business practices. Suppliers **must** avoid conflicts of interest and implement effective and adequate policies and procedures to ensure that actual, potential or perceived conflicts of interest are identified, assessed and, where possible, mitigated.

### 5.4.3. Confidentiality and data protection

Suppliers **must** collect, store, process and transfer data in compliance with applicable laws and documents specified in clause 8.2 hereof. Suppliers **must** protect intellectual property and confidential information. Suppliers **must** provide tailored training to relevant employees covering their rights and obligations with regards to data protection and confidentiality.

### 5.4.4. Ethical principles

The Company expects its Suppliers to adhere to ethical principles, such as personal responsibility, honesty, decency and professional competence, which reflect the moral principles, professional and business values and standards of Nornickel employees.

## 6. Implementation guidance

As part of its commitment to responsible business practices, Nornickel aims to develop long-term relationships with its suppliers based on shared values and common goals.

This implies that Nornickel's suppliers adhere to principles that are consistent with those set forth in this Supplier Code of Conduct, which is based on internationally recognised standards as well as Nornickel's internal policies and commitments. All suppliers are expected to proactively engage their own supply chain where relevant and implement similar standards in a manner that is appropriate to their circumstances. Note that if local legislation differs from the expectations presented in this document, suppliers should adhere to whichever sets a higher standard if it does not violate the requirements of national legislation.

Nornickel is aware that meeting these standards requires time and that their development and adoption is a process of continuous improvement. Therefore, Nornickel rates its requirements based on the significance and priority of compliance by the Suppliers with this Code according to Chapter 1 hereof. In the spirit of open and constructive dialogue, Suppliers are encouraged to reach out to ask questions if clarifications are needed and to inform Nornickel of any challenges or barriers they may face. Nornickel can be reached either by sending an e-mail to [suppliers@nornik.ru](mailto:suppliers@nornik.ru) or by phone +7 (495) 783-00-45, ext. 6 (for Moscow); 8 (800) 700-59-11, ext. 6 (toll-free federal number). Nornickel offers tangible support to its supply partners: by working together we will achieve a more sustainable future.

The implementation guidance provided is based on a comprehensive system informed by recognised good practices, such as the OECD Due Diligence Guidance Five-Step Framework for Risk-Based Due Diligence and provides concrete examples of Nornickel's expectations.

First, Suppliers are expected to build strong **corporate management systems** and ensure senior level commitment to responsible business conduct. For example, in order to meet the requirements with regards to working conditions, suppliers must have an employee hiring system based on written contracts that include all key aspects of their employment. Furthermore, suppliers should develop a clearly articulated non-discrimination policy and train staff and managers to understand what this entails in relation to their function.

Second, Suppliers are expected to **identify and assess risks** and adverse impacts. For example, to satisfy Nornickel's requirements on issues surrounding corruption, financial and tax crimes, as well as export controls and sanctions compliance, suppliers must conduct appropriate due diligence on their operations. Where potential risks are identified, suppliers should carry out a more in-depth assessment and take corrective actions.

Third, Suppliers are expected to find ways to **mitigate risks** related to compliance with principles and requirements described herein. For example, to meet the requirements on issues related to employee health and safety, suppliers must have clear safety plans and must regularly test their effectiveness. In order for the system to be effective it must include incident and accident reduction targets and constant monitoring.

Fourth, Suppliers are expected to track performance and **verify** results. For example, in order to protect the environment and reduce negative impacts. Suppliers must set clear environmental performance targets which must be independently assured on a regular basis.

Last, Suppliers are expected to engage with the public and communicate how impacts are addressed. For example, to meet Nornickel's standards with regards to human rights, suppliers must publicly commit to respecting human rights and in particular those of vulnerable groups that might be marginalised if adversely impacted by suppliers' operations. Employees, Suppliers and the general public must be informed of the existence of a grievance mechanism to report any misconduct and adverse impacts deriving from business operations. The reporting of the supplier's performance can occur within existing formats, such as annual reports or sustainability reports.

## **7. Grievance mechanism**

Nornickel established a Corporate Trust Line to enable internal and external stakeholders to report violations of the law or internal Company policies. The Corporate Trust Line can be reached by sending an e-mail to [skd@nornik.ru](mailto:skd@nornik.ru) or by phone 8 (800) 700-19-41; 8 (800) 700-19-45. The message can also be sent via a designated form on the Company website, Corporate Trust Line section: <https://www.nornickel.ru/sustainability/corporate-hotline/>. Reports can be made anonymously and will be reviewed on a confidential and independent basis. Retaliation will not be tolerated.

## **8. References**

The following Company's regulatory documents and other normative acts were used for the development of this Supplier Code of Conduct:

### **8.1. Corporate by-laws**

- Anti-Corruption Policy
- Antitrust Compliance Policy
- Biodiversity Policy
- Business Ethics Code
- Environmental Policy
- Environmental Impact Assessment Policy
- Equal Opportunities Programme
- Freedom of Association Policy
- Human Rights Policy

Indigenous Rights Policy  
Occupational Health and Safety Policy  
Personal Data Processing Policy  
Renewable Energy Sources Policy  
Responsible Sourcing Policy  
Support for Small and Medium Enterprises Policy  
Working Conditions Policy

## **8.2. Laws of the Russian Federation, international law and other regulations**

International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and its Follow-up  
Ten Principles of the UN Global Compact  
Voluntary Principles on security and human rights, developed in 2000 jointly by governments of the United States and the United Kingdom, companies and non-governmental organizations as part of a dialogue on security and human rights  
UK Modern Slavery Act  
Code of Conduct for Law Enforcement Officials (adopted by General Assembly on 17 December 1979)  
The Worst Forms of Child Labour Convention of the ILO (No. 182)  
The Holidays with Pay Convention of the ILO (No. 132)  
The Minimum Wage Fixing Convention of the ILO (No. 26)  
The Weekly Rest (Commerce and Offices) Convention of the ILO (No. 106)  
The Weekly Rest (Industry) Convention of the ILO (No. 14)  
Indigenous and Tribal Peoples Convention of the ILO (No. 169)  
The Minimum Age Convention of the ILO (No. 138)  
The Discrimination (Employment and Occupation) Convention of the ILO (No. 111)  
The Equal Remuneration Convention of the ILO (No. 100)  
The Freedom of Association and Protection of the Right to Organise Convention of the ILO (No. 87)  
The Occupational Health and Safety Convention of the ILO (No. 155)  
Convention on the Rights of the Child (adopted by General Assembly on 20 November 1989)  
The OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions  
The UN International Bill of Human Rights  
Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc, jointly developed by The Copper Mark, the International Lead Association (ILA), the Nickel Institute (NI), the International Zinc Association (IZA) and the Responsible Minerals Initiative (RMI)  
Basic Principles on the Use of Force and Firearms by Law Enforcement Officials (adopted by the UN Congress)  
The ICMM Mining Principles (cl. 4.2.)  
The Greenhouse Gas Protocol, jointly developed by World Resources Institute and World Business Council for Sustainable Development  
Regulation (EU) 2016/679 dated 27.04.2016 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation)  
The Task Force on Climate-related Financial Disclosures (TCFD) recommendations

The China Chamber of Commerce of Metals, Minerals and Chemicals Importers & Exporters (CCCMC) Chinese Due Diligence Guidelines for Responsible Mineral Supply Chain

The International Chamber of Commerce (ICC) practical tools – The ICC Antitrust Compliance Toolkit

The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas

The ICMM Good Practice Guidance for Mining and Biodiversity

The ICMM Practical Guide to Catchment-Based Water Management for the mining and metals industry

The UN Guiding Principles on Business and Human Rights

The Initiative for Responsible Mining Assurance (IRMA) Standard for Responsible Mining (Chapter 3.4)

The China Chamber of Commerce of Metals, Minerals and Chemicals Importers & Exporters (CCCMC) Pilot Cobalt Refiner Supply Chain Due Diligence Standard

Standard ISO 14001:2015 Environmental management systems. Requirements with guidance for use

Federal Law of the Russian Federation On Guarantees of the Rights of Indigenous Ethnic Groups of the Russian Federation (No. 82-FZ)

Federal Law of the Russian Federation On Wildlife (No. 52-FZ)

Federal Law of the Russian Federation On Protection of Competition (No. 135-FZ)

Federal Law of the Russian Federation On Licensing of Certain Activities (No. 99-FZ)

Federal Law of the Russian Federation On Personal Data (No. 152-FZ)

Federal Law of the Russian Federation On Counteracting Corruption (No. 273-FZ)

Federal Law of the Russian Federation On Sanitary and Epidemiological Welfare of the Population (No. 52-FZ)

Federal Law of the Russian Federation On Territories of Traditional Nature management of Indigenous Peoples of the North, Siberia, and the Far East of the Russian Federation (No. 49-FZ)

Federal Law of the Russian Federation On Environmental Protection (No. 7-FZ)

London Metal Exchange Red Flag Assessment Template.

### **Annex 1. Abbreviations**

Term	Definition
ESG	Environmental, social and corporate governance
DDMS	Due Diligence Management System
OECD 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
EITI	Extractive Industries Transparency Initiative
ICMM	International Council on Mining and Metals
IRMA	Initiative for Responsible Mining Assurance