



НОРНИКЕЛЬ

APPROVED
by the Board of Directors
of PJSC MMC Norilsk Nickel
(Minutes No. GMK/30-pr-sd dated
07.10.2021)

RESPONSIBLE SOURCING POLICY PJSC MMC Norilsk Nickel

1. Objective

PJSC MMC Norilsk Nickel (the "Company" or "Nornickel") is committed to ethical and sustainable business practices, which includes responsible sourcing of raw materials, goods, services and environmental, social and corporate governance ("ESG") related priorities in its wider supply chain. Nornickel's Responsible Sourcing Policy (the "Policy") confirms its commitment to continuously carry out appropriate supply chain due diligence in line with the applicable law of the Russian Federation, widely recognised principles and standards of international law, international treaties of the Russian Federation, and voluntary commitments. Nornickel communicates the Policy to its employees and suppliers by way of posting the Policy on the Company's website and through other communication channels.

The structure of the Policy reflects the Company's priorities with regards to responsible sourcing and its approach to risk management ¹ in its broader supply chain, including those suppliers that are Nornickel's subsidiaries. Specifically:

- Section 5.1 of the Policy outlines Nornickel's approach to responsible sourcing, including of raw material supplies, in line with the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("OECD Guidance");
- Sections 5.2, 5.3 and 5.4 of the Policy provide an overview of ESG priorities of particular relevance to the Company's responsible supply chain management;
- Section 6 focusses on the Company's due diligence management system for ensuring responsible sourcing across Nornickel's supply chain modelled on the OECD Five-step Framework for Risk-Based Due Diligence ("OECD Framework") described in Annex I of the OECD Guidance.

2. Scope

This Policy covers all Nornickel sourcing activities related to the selection of suppliers, contractors and subcontractors ("Suppliers") in the supply chain of raw

¹ Risk Management (Risk Management Process) is a continuous process that includes identification, analysis, evaluation and/or prioritisation of risks, as well as planning and execution of risk response plans, development and implementation of risk management activities, control over the execution of Action Plans and monitoring (assessment) of the effectiveness of the risk management process related to environmental, social and corporate governance (ESG) issues.

materials², goods, works and services. The provisions of the Policy apply to all business units that are part of Norilsk Nickel Group (jointly referred to as "Nornickel") in which Nornickel, directly or indirectly, holds more than 50% of the authorised capital, subject to the restrictions and requirements of the applicable law.

Requirements and expectations for Suppliers are reflected in the Nornickel Supplier Code of Conduct ("the Code").

3. General information

As Russia's leading metals and mining company and one of the world's largest producers of raw materials and refined products, the Company acknowledges its responsibility to advance ethical and sustainable business practices within the industry to benefit its employees and the global community. This is why Responsibility is one of Our Values.

Nornickel's commitments to responsible sourcing as outlined in this Policy start within its own operations and extend to its suppliers. Nornickel requires its Suppliers to act in accordance with the Nornickel Supplier Code of Conduct, which should be read in conjunction with the responsible sourcing principles and standards described in Section 5 of this Policy. Nornickel is committed to fostering long-term engagements with its suppliers and organises Supplier training and/or capacity-building initiatives, as required.

Where necessary, Nornickel works with Suppliers and external stakeholders to develop effective, appropriate and measurable improvement plans to increase the suppliers' ability to implement requirements contained in the Supplier Code of Conduct.

The Nornickel Supplier Code of Conduct also offers requirements and recommendations to Nornickel's Suppliers to ensure they can meet the requirements contained therein and work together towards more responsible supply chains across the industry.

To support transparent and open communication on priorities concerning responsible sourcing beyond its operations, the Company actively engages with relevant stakeholders and organisations. Most importantly, Nornickel's Corporate Trust Line serves as a grievance and remediation mechanism for internal and external stakeholders, enabling them to confidentially report any concerns relating to Nornickel's responsible sourcing practices without fear of retaliation.

4. Regulatory Framework

This Policy is based on recognised responsible sourcing standards, initiatives and frameworks such as the OECD Guidance and is in line with the legal and regulatory requirements of the Russian Federation as well as applicable international laws and conventions.

²The 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. Nornickel's responsible sourcing principles and standards

5.1. Responsible Sourcing

5.1.1. Human rights

Recognising the risks of adverse human rights impacts and conflict associated with the extraction, trade, handling and export of raw materials from conflict-affected and high-risk areas, Nornickel will neither tolerate nor in any way assist with, contribute to, facilitate the commission by any party of or profit from any forms of human rights violations or abuses in its supply chains. This includes:

- cruel, inhuman and degrading treatment, any forms of torture;
- any forms of forced or compulsory labour;
- the worst forms of child labour;³
- other gross human rights violations and abuses, such as globally widespread sexualised violence;
- war crimes or other violations of international humanitarian law, crimes against humanity or genocide.

5.1.2. Security forces

Nornickel will not tolerate any direct or indirect support to public or private security forces or their affiliates, who may exercise control illegally or be involved in illegal taxing or extortion in connection with the extraction, transport, trade, handling or export of raw materials in its supply chain. If Nornickel or any company in its supply chain contracts public or private security forces, Nornickel strives to ensure that such security forces comply with, and expects its Suppliers to comply with, the Voluntary Principles on Safety and Human Rights.⁴

5.1.3. Financial crime and transparency

Nornickel will not commit, and will ensure that its employees, affiliates or agents will not commit any actions such as giving or receiving a bribe, assistance in bribery, commercial bribery, assistance in commercial bribery, and other actions violating any domestic and international anti-corruption laws. Nornickel aims to disclose payments to governments in relation to the extraction, trade, processing, transportation and export of raw materials in line with Extractive Industries Transparency Initiative (EITI) requirements⁵.

5.1.4. Stakeholder engagement

Nornickel is committed to engaging with external stakeholders and relevant governmental and non-governmental organisations to manage risks associated with the extraction, trade, handling and export of raw materials or the presence of public or private security forces in its supply chain and to promote transparency, proportionality and accountability in payments made to security forces in its supply chain.

³ As defined in the ILO Convention (No. 182) concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour;

⁴ The 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 organisations as part of a dialogue on security and human rights.

⁵ EITI - Extractive Industries Transparency Initiative.

If Nornickel finds a Supplier to be in violation of any of the above principles, it will implement an appropriate risk mitigation strategy which may include suspending or discontinuing its engagement with the Supplier depending on the risks identified and corrective actions taken.

5.2. Environmental protection

Nornickel adheres to its commitments regarding responsible environmental management, energy efficiency, minimising the company's impact on biodiversity, water, air and soil; and sustainable tailings and waste management as set out in the Company's policies and Business Ethics Code and extends the commitments to its supply chain.

5.3. Social responsibility, occupational health and safety

Nornickel is committed to respecting human rights, the rights of indigenous people in the territories of their traditional living and economic activities, including the right of free, prior and informed consent, and the rights of human rights defenders and monitoring and eliminating risks of human rights abuses, labour law violations, human trafficking, modern slavery and child labour across its supply chains.

Nornickel is committed to creating a safe and healthy working environment for its employees, assessing occupational health and safety risks, and promoting relevant safety practices through its supply chain. Nornickel ensures that its working conditions meet the highest standards, in particular with regards to health and safety, and requires its Suppliers to do the same.

When conducting its business Nornickel, abides by social, occupational health and safety commitments set out in the Company's policies and Business Ethics Code.

5.4. Corporate governance

Nornickel conducts business in an ethical and transparent manner to prevent bribery and corruption, fraud, money laundering, financing of terrorism and tax crimes in Nornickel's transactions across its supply chain in line with the corporate governance commitments set out in the Company's policies and Business Ethics Code.

6. Due diligence management system

6.1. Five-step framework

The Company has established a comprehensive Due Diligence Management System ("DDMS") and overarching Due Diligence Procedure to manage risks in its supply chain in line with stakeholder expectations, leading industry practices and the internationally-recognised good practice framework of the OECD Guidance — the Five-Step Framework for Risk-Based Due Diligence. Based on this framework. The Company:

6.1.1. Establishes strong systems of responsible sourcing management, including:

- the publicly available Responsible Sourcing Policy and the Nornickel Supplier Code of Conduct, specifying requirements for Suppliers;
- internal management structures to support supply chain due diligence and efficiently communicate critical information to internal and external stakeholders;
- a system of controls and transparency over the supply chain, including the identification of upstream Suppliers; and

– Nornickel’s Company Trust Line that any affected stakeholder can use to raise concerns regarding the circumstances of extraction, trade, handling and export of raw materials and ESG risks in the Company’s supply chain more broadly.

6.1.2. Implements a process to manage supply chain risks, including:

- conducting supply chain risk assessments;
- a review of risks related to sourcing from conflict-affected and high-risk areas; and
- mapping of the factual circumstances of the supply chain.

6.1.3. Designs and implements measures to respond to any identified risks, including:

- communicating the results of supply chain risk assessments to senior management;
- using the Corporate Risk Management System;
- developing measurable risk mitigation plans, which can include training of Suppliers and other capacity-building projects;
- monitoring processes for the implementation of corrective actions; and
- reporting the results of risk management to senior management.

6.1.4. Ensures audits of identified risks by independent third parties auditing the Company’s supply chain due diligence practices.

6.1.5. Commits to report publicly on (subject to the requirements of guidelines and regulations related to the handling of Nornickel’s confidential information and trade secrets):

- required supply chain due diligence policies and practices;
- grievances received and addressed;
- the results of supply chain risk assessments; and
- risk management activities.

Nornickel aims to disclose such information in line with EITI requirements and principles.

6.2 Roles and responsibilities

To confirm the Company’s commitment to responsible sourcing and effective supply chain due diligence, the Company entrusts Senior Vice President for Sustainable Development with responsibility for the implementation of the DDMS.

The Company focuses on the following responsibilities:

- Approval of supplier regulatory requirements and tools that are part of the DDMS;
- Monitoring and review of the effectiveness of DDMS at least annually;
- Regular implementation:
 - Informing Suppliers and the Company employees of the supplier requirements;
 - Conducting supply chain risk assessments;

- Developing supply chain risk management measures;
- DDMS assessment and audit;
- Reporting results of supply chain risk assessment and mitigation to senior management;
- Communicating and, as required, coordinating with customers on supply chain risks assessments;
- Preparing the annual report on responsible supply chain due diligence;
- Updating regulatory requirements and tools based on the annual review;
- Developing/overseeing employee training on DDMS.