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| <b>POLITIIKKA</b><br><br><br><br><br>Versio 7<br>Julkaisu pvm 7.7.2026 | <b>SUPPLIER CODE OF CONDUCT</b><br><br><br><br><br>Laatija 16 Hankintapalvelut<br>Hyväksyjä Mikkola, Marko | <div data-bbox="1225 107 1372 241">  <br/> <b>NORNICKEL</b> <br/> <small>HARJAVALTA</small> </div> <div data-bbox="1433 96 1500 134">1 (2)</div> |
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## Norilsk Nickel Supplier Code of Conduct

For ensuring a responsible conduct not only with legal but also with ethical, social, and environmental issues this Code of Conduct summarizes the requirement to which Norilsk Nickel Harjavalta Oy (hereinafter referred to as "Norilsk") is committed and which Norilsk also requires its suppliers (hereinafter referred to as "Supplier") to commit.

Nornickel is required to comply with the requirements of the Cybersecurity Act (NIS2). These requirements also apply to Nornickel's suppliers who process its data, have access to its information networks, use its systems, provide digital services to it, or whose activities may affect its cybersecurity or business continuity.

### Compliance with legislation

Supplier shall comply with current applicable legislation and regulations.

### Human and labor rights

The Supplier shall comply with the core conventions of the International Labour Organization (ILO) and respect internationally recognized human rights. The use of child labour, forced labour, and labour linked to any form of punishment is strictly prohibited. The Supplier shall treat its employees fairly, equally, and with respect, and shall comply with all applicable labour laws and regulations.

### Working environment and safety

The supplier must ensure the safety and safe working conditions of its employees. Suppliers shall also work actively to prevent accidents and work-related injuries. A supplier shall offer its employees applicable protective devices and training. Working in Nornickel plant area requires Suppliers commitment to EHS service provider guidance in force time to time.

### Environment

The Supplier shall minimize the adverse environmental impacts of its operations and to pursue energy efficiency and continuous improvement in all aspects of its business activities. The supplier must ensure that the permits required for operational activities are kept up to date.

### Cybersecurity and information security

The supplier shall protect Nornickel's data, systems, and equipment in accordance with the requirements of the Cybersecurity Act (NIS2). The supplier shall ensure that its personnel act securely and receive the necessary cybersecurity training. The supplier must maintain adequate continuity and contingency plans to ensure the continuation of operations despite potential cyber incidents. The supplier must ensure that its devices and software are up to date and that data is managed securely. The supplier must ensure that access control and data processing are organized in a secure manner and with appropriate safeguards.

### Business Integrity

The supplier must comply with the rules of competition law and any kind of corruption or bribery will be prohibited. Bookkeeping shall be done as requested in applicable laws. The supplier must respect patents and copyright laws. The supplier must not disclose confidential information to third parties.

### Outsourcing and supplier's supply chain

Suppliers must ensure that the supplier's supply chain complies with this or similar kind of Code of Conduct. The supplier must assess cybersecurity risks related to its subcontractors and ensure that such subcontractors comply with Nornickel's information security requirements. The Supplier shall notify Nornickel if any cybersecurity-related

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| Versio 7              | Laatija 16 Hankintapalvelut     |                                                                                                                                      |       |
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risks arise within its supply chain. This requirement applies in particular to Suppliers providing IT services, software, automation, or process control systems, as well as critical equipment and maintenance services.

#### **Follow-up and enforcement**

The supplier shall immediately notify Nornickel of any breach or a suspicion of any breach of these ethical rules. In case of any information security incidents, suspected data breaches, malware infections, lost or stolen devices, and other cybersecurity-related risks supplier shall inform via email to [tietoturva@nornickel.fi](mailto:tietoturva@nornickel.fi) and by phone to Nornickel's contact person without delay. Supplier shall assist Nornickel in investigating such incidents. The supplier shall not take any action against any person who, in good faith, seeks advice or reports a violation or a potential violation.

Date

Signature:

Name:

Role:

Company Name: