

Distribution: Public Status:

published 4.7.2025

Public Due Diligence Report

Reporting period of this report is from March 1st 2024 to 15th of June 2025.

1 Company Information

Norilsk Nickel Harjavalta Oy (NNH) is a significant and diverse refiner of nickel metal and chemicals. Our job is to produce the base and precious metals needed by society in an efficient and safe manner. We promote sustainability and we recognize our responsibility towards the environment, people and society. NNH is a part of the global Norinickel Group. Our facilities are located in Harjavalta suurteollisuuspuisto at Teollisuuskatu 1, 29200 Harjavalta, Finland.

2 Audits

NNH has undergone a Responsible Minerals Assurance Process (RMAP) Assessment for Cobalt. First follow-up audit was held in our Harjavalta refinery from 20th to 21st of June 2022. At this time we were audited against both Responsible Minerals Assurance Process Cobalt Standard of 2022 and Joint Due Diligence Standard for Copper, Lead, Nickel and Zinc of 2021.

NNH received a) updated RMI conformant cobalt refinery status on 21st of June 2022. Our company's identification is CID003390 and b) for the first time, conformant nickel refinery status against the Joint Due Diligence Standard for Nickel with the identification number CID004008.

The next follow-up audit was made on the 1st to 3rd of July 2024.

At the time of writing this report, the scheduled next follow-up audit is planned to be taking place during from the 29th of July to 1st of August 2025.

3 Supply Chain Policy

NNH has established a supply chain policy which is fully aligned with the third edition of OECD Due Diligence Guidance.

You can find our Supply Chain Policy in our website.

4 NNH Due Diligence Management System

NNH has developed and implemented a management system to ensure its operations due diligence. The management systems consist of the following:

- NNH Managing Director and NNH management team, are responsible for the Due Diligence management system.
- Manager – Raw Materials and customers, is in charge of risk management, identification of the risks, mitigation measures and identification of red flags. Risk analysis results and risk mitigation plan are presented to NNH management team by the manager.
- The management team is responsible for arranging training for all relevant employees.
- NNH Managing Director and HR Director are responsible for the NNH grievance system.
- All the records are placed in the NNH documentation system.

5 Risk assessment and management

NNH CAHRA procedure is done to each individual raw material purchased to NNH and it consists from the following steps:

Define the supply chain and logistic route from mine to NNH

- a) Define the mine, concentrating plant, smelter of this raw material.
- b) Define the logistics route from mine to NNH including all used ways of transportation, warehouses, operators and geographical locations.
- c) Use purchase agreement and transportation data or the plan for transportation and the chain of custody data.

Analyze whether there is a risk along the chain of custody

- a) Use EU Conflict Minerals / CAHRA map, RMI's Global Risk Map and Section 1502 of U.S. Dodd Frank Act to assess whether the logistics route passes through CAHRA-area.
 1. EU Conflict Minerals / CAHRA map (<https://www.cahraslist.net/cahras#COD>) is used as source of potential High Risk Areas. When raw material either is being produced in a country on the list or passes through the country on its way towards NNH, a red flag is raised.
 2. RMI's Global Risk Map (<http://www.responsiblemineralsinitiative.org/minerals-due-diligence/risk-management/rmi-global-risk-map/>) is used as source of potential High Risk Areas. When raw material either is being produced in a country on the list or passes through the country on its way towards NNH, a red flag is raised. NNH uses Extreme and High risk levels on the RMI's Global Risk Map during the CAHRA evaluation.
 3. Section 1502 of U.S. Dodd Frank Act. The countries under this Act are: the Democratic Republic of Congo, Angola, Burundi, Central African Republic, Republic of Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia.

When raw material either is being produced in a Dodd Frank Act country or it passes through the country on its way towards NNH, a red flag is raised.

b) The following criteria of Red flags are used

Red flag locations of origin and transit:

1. The mineral originates from or has been transported through a conflict-affected or high-risk area.
2. The mineral is claimed to originate from a country that has limited known reserves or stocks, likely resources or expected production levels of the mineral (i.e. the declared volumes of the mineral from that country are out of keeping with its known reserves or expected production levels).
3. The mineral is claimed to originate from a country through which minerals from conflict-affected and high-risk areas are known or reasonably suspected to transit.
4. The mineral is claimed to originate from recyclable/scrap or mixed sources and has been refined in a country where minerals from conflict-affected and high-risk areas is known or reasonably suspected to transit.

Supplier red flags:

1. Suppliers or other known upstream companies operate in one of the abovementioned red flag locations of mineral origin and transit or have shareholder or other interests in suppliers of the mineral from one of the abovementioned red flag locations of mineral origin and transit.
2. Suppliers or other known upstream companies are known to have sourced the mineral from a red flag location of mineral origin and transit in the last 12 months.

Red flag circumstances taken into account

Anomalies or unusual circumstances are identified through the information collected in Step 1 which give rise to a reasonable suspicion that the material may contribute to conflict, or serious abuses associated with the extraction, transport or trade of material. Report the found red flag areas or operators.

c) Enhanced Due Diligence

If NNH finds/raises a Red flag(s) in its supply chain, enhanced due diligence process, as defined in the Cobalt Refiner Supply Chain Due Diligence Standard is applied to address the Red flag(s).

Conduct Know Your Supplier analysis

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- a) Use ownership data of the participating companies / organizations along the chain of custody.
- b) Gather data of the beneficial owners of all the companies operating at the value chain starting from the mine until the NNH, including all transportation and warehousing companies.
- c) Check whether any of the beneficial owners are noted at any of the ban lists of nations on the logistic chain of custody or UN black list. When there are beneficial owners that are ban listed, evaluate risks and consequences to the deliveries, NNH as company and Nornickel Group as company.
- d) Include the analysis with red flags, risks and consequences found in the summary for the NNH Management Team.

NNH Management Team assessment on NNH Raw Material Due Diligence in the Supply Chain

Management Team is presented yearly summary 1H of the year

Manager – Raw Materials and customers - defines and produces:

- Risk analysis report per raw material,
- Individual raw material mitigation plan and
- Summary Presentation for the Management Team of NNH

NNH Management Team confirms the action plan for NNH and summarizes NNH's success on the Due Diligence in the Supply Chain.

By doing the previous, NNH Management Team produces NNH's Yearly report on the Due Diligence in the Supply Chain.

CAHRA evaluation results (March 1st 2024 to 15th of June 2025.)

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Identified Red flags and actions

We found one Red Flag that was due to the location of the supplier. As Enhanced Due Diligence, two On Ground Assessments were made. Assessment Criteria's used were the Joint Due Diligence Standard, RMAP's Cobalt Standard and OECD's DD Guidance. Based on these On Ground assessments and their reported findings, there is no basis for elevated risk. And no further mitigation actions are needed.