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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 Nornickel 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. The company conducting the audits has been Arche Advisors and the Auditor was Kaido Katalsepp.

NNH received a) updated RMI conformant cobalt refinery status of 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. The company

conducting the audits has been Arche Advisors and the Auditor was Kaido Katalsepp.

All RMI audit Summary Assessment Reports are attached here as Appendices of this Public Report.

At the time of updating this report, the scheduled follow-up audit has been made between the 29th of July and the 1st of August 2025. The audit summary report has not been published.

3 Supply Chain Policy

NNH has established a Supply Chain Policy which is fully aligned with the third edition of the OECD Due Diligence Guidance.

You can find our Supply Chain Policy in the following link [Supply Chain Policy](#)*:

**In a case this link does not work, you can find the working link on the same web page than this report.*

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. This applies for every new employee and the retraining is mandatory on every second year for the employee's that work and operate with our Nickel and Cobalt containing raw materials.

- NNH Managing Director and HR Director are responsible for the NNH grievance system. The whistleblowing channel can be accessed on the following link:
<https://nornickel.ilmoituskanava.fi/#/>
- All the records are placed in the NNH documentation system. The retention time of the records is minimum 5 years.

5 Risk assessment and management

NNH Due Diligence Risk Evaluation 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 Due Diligence Risks 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

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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

NNH management Team will assess the effectiveness and performance of the NNH Due Diligence process by reviewing it on annual basis:

- The review includes the data along the chain of custody and contains at least the following:
 - Review of the Due Diligence Risks Evaluation results made for each raw material
 - Know Your Supplier analysis
 - CAHRA Assessment Tools results per nation along the Chain of Custody
 - Supplier Risk Assessment data
 - In a case of a risk, the planned risk mitigation plan according to the Risk Mitigation Matrix
 - Per raw material and supplier
 - Results of the data received through the NNH Grievance and Feedback Channel
- This review is to be done every year.
 - And in a case of a potential new raw material, this management review must be made prior making of the new supply agreement.
- During the review, decisions to conduct Risk Mitigation actions, including potential stop of deliveries and co-operation are made and recorded.

Management team will also review and conclude on:

- Overall evaluation of the management system's effectiveness and performance in the scope and the methodology used.
- The results and conclusion made will assist the Management Team to conclude of the needed actions and at the same time assess the validity of the NNH Supply Chain Policy.

During the management team meeting:

- a) The Manager – Raw Materials, presents the summary report of the made risk analyses and assessments per raw material including the risks found and the proposed mitigation plan.

- b) NNH Management Team confirms the action plan individual items for NNH. And concludes and decides on the overall evaluation of the management system's effectiveness and performance on the NNH Due Diligence in the Supply Chain.

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

Due Diligence Risks Evaluation Results (March 1st 2024 to 15th of June 2025.)

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During the assessment period, Norilsk Nickel Harjavalta Oy processed feed from Nornickel Groups own assets and from third party suppliers. Raw materials were sourced from two countries during the Assessment period.

Vast majority of the raw materials are primary / mined raw materials. But we did receive also recycled raw materials from third party suppliers.

The Risk assessment was made according to NNH DUE DILIGENCE RISKS EVALUATION PROCESS. That is also described in general level in this report at paragraph 5.

- When following our Due Diligence Risk Evaluation process, we co-operated with our third-party suppliers by reviewing together our Supply Chain Policy with them.
 - We received their formal acknowledgement of complying to our Supply Chain Policy.
- And we updated our Know Your Supplier Analysis of them, including the review of beneficial owners.
 - Amongst our suppliers are companies that are third party Certified by the RMI and companies that source only recycled material as their feed.
- We found one Red Flag that was due to the location of the supplier in Russia. Russia holds RMI Risk Map Category Extreme.
- Due to the found Red Flag, two On Ground Assessments were contracted from a competent 3rd party auditor. This on-ground assessment was made as needed resulting Enhanced Due Diligence action.
 - Assessment Criteria 's used in the On Ground assessments were the Joint Due Diligence Standard and RMAP 's Cobalt Standard and OECD 's DD Guidance.
 - Based on these On Ground assessments and review on their reported findings: No actual or potential adverse impact risks were found during the On Ground Assessments. Some minor "Just do" status corrective actions were registered during

the audits, but they were not targeting Due Diligence in the Raw materials.

- The follow-up on the audits minor findings was agreed to be made during the forecastable 1-year follow-up on-ground assessments.
- As Conclusion, we decided to have no further risk mitigation actions due to the found Red Flag. And the co-operation continued on a normal level during the on-ground assessments.
- Currently there are no known sanctions that are targeted or in place towards Norilsk Nickel Harjavalta Oy or PJSC MMC Norilsk Nickel in the EU, US or UK.
- NNH has not received any cases reported via the Grievance system on the assessment period
 - Link to the system is <https://nornickel.ilmoituskanava.fi/#/>

Based on the data received and discussions had during the Management Review:

- The NNH Due Diligence System is operating based on the NNH Guidance and the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.
- The management system's assessments, evaluations and on-ground assessments were made according to our Guidance. During the Year 2025 we did revise our Guidance to better serve and fulfill the detailed requirements. This resulted in the re-assessments and evaluations amongst other on two service providers on the Chain of custody, where the Red Flag was earlier noticed. Currently we find the management system to operate effectively in the scope and according to the tools defined in our Guidance.
- We evaluated, based on the received feedback, our Supply Chain Policy and made minor formal changes to it.
- The updated Public report and the NNH Supply Chain Policy can be published on the Company's website.

APPENDIX 1: RMAP summary assessment report 2024.

Responsible Minerals Initiative
www.responsiblemineralsinitiative.org



September 10, 2024

Juha Parkkinen,
Norilsk Nickel Harjavalta Oy
Teollisuuskatu 1
Harjavalta, Finland, 29200

Dear Juha Parkkinen,

Thank you for your participation in the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP).

The RMI has reviewed the process and results of **Norilsk Nickel Harjavalta Oy's** Responsible Minerals Assurance Process Assessment for **Joint Due Diligence (JDD) Standard for Copper, Lead, Nickel and Zinc (2022)** and **Cobalt Due Diligence Standard (2021)**. Assessment scope included **Nickel and Cobalt**. The assessment was conducted at the following location on the following dates:

Norilsk Nickel Harjavalta Oy
Teollisuuskatu 1
Harjavalta, Finland, 29200
July 01 – July 03, 2024

Based on the Assessor's findings and the RMI's quality control review process, **Norilsk Nickel Harjavalta Oy** is conformant with the Assessment Standard for **Joint Due Diligence (JDD) Standard for Copper, Lead, Nickel and Zinc (2022)** and **Cobalt (2021)**. The review covers only the facility listed above and the next assessment should take place on or before 07/03/2024. Your conformant status will be updated on the RMI's publicly available website shortly. The list of currently RMAP Conformant companies is published and maintained on RMI's website.

Please note that any findings designated "conform with continual improvement" will need to be addressed before the time of your next assessment. If they are not closed at that time, then they will be categorized as non-conformant findings.

Thank you for participating in the Responsible Minerals Assurance Process.

Sincerely,
Responsible Minerals Initiative

APPENDIX 2: RMAP summary assessment report 2022.

Responsible Minerals Initiative
www.responsiblemineralsinitiative.org



May 06, 2024

Juha Parkkinen,
Norilsk Nickel Harjavalta Oy
Teollisuuskatu 1
Harjavalta, Finland, 29200

Dear Juha Parkkinen,

Thank you for your participation in the Responsible Minerals Initiative (RMI) Responsible Minerals Assurance Process (RMAP).

The RMI has reviewed the process and results of **Norilsk Nickel Harjavalta Oy's** Responsible Minerals Assurance Process Assessment for **Joint Due Diligence (JDD) Standard for Copper, Lead, Nickel and Zinc (2022)** and **Cobalt Due Diligence Standard (2021)**. Assessment scope included **Nickel and Cobalt**. The assessment was conducted at the following location on the following dates:

Norilsk Nickel Harjavalta Oy
Teollisuuskatu 1
Harjavalta, Finland, 29200
June 20 – June 21, 2022

Based on the Assessor's findings and the RMI's quality control review process, **Norilsk Nickel Harjavalta Oy** is conformant with the Assessment Standard for **Joint Due Diligence (JDD) Standard for Copper, Lead, Nickel and Zinc (2022)** and **Cobalt (2021)**. The review covers only the facility listed above and the next assessment should take place on or before 06/21/2023. Your conformant status will be updated on the RMI's publicly available website shortly. The list of currently RMAP Conformant companies is published and maintained on RMI's website.

Please note that any findings designated "conform with continual improvement" will need to be addressed before the time of your next assessment. If they are not closed at that time, then they will be categorized as non-conformant findings.

Thank you for participating in the Responsible Minerals Assurance Process.

Sincerely,
Responsible Minerals Initiative