

Bettercoal, Uniper and Russian Coal

Assessments of operations, buyers' decisions and the
lives of people living beside mining

Natalia Zubkova — author and investigative journalist.

Final editorial decisions and responsibility rest with Natalia Zubkova.

EN PDF V04 • 28 October 2026

In my own words. 28 October 2026



Natalia Zubkova

Since 2019, when residents of Kiselyovsk appealed to be resettled in Canada, I have learned first-hand what it means to face pressure for my work as a journalist and environmental campaigner.

First came the vile articles about me. Then the threats, including announcements of my ‘execution’. Eventually, there was an actual attack. There were also several road accidents during that period, the circumstances of which still raise questions for me. I cannot claim that they were deliberately organised. But at the time, against the backdrop of everything that was happening, I

perceived them as another possible threat.

Until I left Russia in 2021, I lived under this pressure. Then came Georgia. Now I am in Germany.

And now I read an article by the energy company Uniper and discover that, in September 2019, its representatives visited Kiselyovsk as part of a Bettercoal mission. In the very year when we were trying to make the whole world hear us.

They were there. They saw for themselves how close to our homes coal was being mined. They wrote about it on their website.

They did not speak to me.

And purchases of Russian coal continued. After the visit, in subsequent years — and, as the company itself reported in March 2022, deliveries under existing contracts continued even after Russia’s full-scale invasion of Ukraine began.

It is difficult to describe what I felt when I read this. Shock. Anger. And a question: what did the things you saw mean to you? What changed after you returned? For the company — and for the people who remained living beside the open-pit mines?

I left. But that did not make my life straightforward or safe in every respect.

In Germany, too, I face things that I experience as psychological pressure: rudeness, disregard, the feeling that no one is listening. In institutions, at the bank, at the Jobcenter. After surgery in hospital, I felt that I was being left without adequate pain relief or the attention I needed.

I cannot know every individual’s motives. But when you are a refugee, speak little German and depend on other people’s decisions, it is especially difficult to get your words taken seriously.

I am not the only one living through temporary accommodation, supervision by security staff that I do not understand, and indifference to our problems. My daughter is living through it too.

And I desperately want to ask: what have I done that is so wrong that I have ended up in this situation?

My flat remains in Russia. In my assessment, coal mining has caused it to lose its value. I have lost contact with my older children: my impression is that they regard contact with me as dangerous. I no longer have my old home, my old family life, or the foundation from which I could calmly build a future.

And all I did was report that black snow was falling in my town.

Frank Plümacher, who previously chaired Bettercoal's Board of Directors, is now Uniper's Human Rights Officer. I want to ask him: how has the experience of Kiselyovsk's residents informed your work to protect those rights? What does protecting human rights mean to you when you are facing a real person with a story like this?

I am not claiming that Uniper is responsible for every episode of my life. But I have questions for a company that bought Russian coal and whose representatives saw my town with their own eyes.

What would you do now in my place? How would you build a life? How would you secure your child's future?

I myself still do not know how to go on living with all of this.

That is why tomorrow, 29 October, I am going to picket Uniper in Düsseldorf. I want to be heard. And I want answers.

About the preparation of this research

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Final editorial decisions and responsibility rest with Natalia Zubkova.

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Abstract

This research compares Bettercoal's public assessments, Uniper documents, Russian regulatory statements and court decisions. Its central question is how information on specific operations moved from assessment and an improvement plan to monitoring and the buyer's decisions. It examines KRU, SUEK, SDS-Ugol, Taldinskaya Mining Company, the early stages of KTK's and TalTEK's participation, the Listvyazhnaya disaster, the visit to Kiselyovsk and the story of journalist Natalia Zubkova in detail.

Methods: documentary analysis, verification of document details and sites, reconstruction of the chronology, comparison of editions of the rules, verification of numerical tables and analysis of the provenance of testimony. The main period is 2015–2022; the organisation's history begins in 2012, and subsequent documents are examined up to 28 October 2026.

The research establishes assessment itineraries, specific subsequent violations and court decisions, published plan statuses, Uniper's use of assessments and the continuation of Russian purchases after the visit. It identifies the documents needed to examine decisions between site visits. The four plans published in July 2022 contain 210 items, of which 65 were verified. Findings for individual mines are distinguished from those for a group of companies.

Keywords: Bettercoal; RECOSI; Uniper; Kuzbass; Listvyazhnaya; residents' rights; industrial safety; supply chain; improvement plans; Natalia Zubkova.

Natalia Zubkova is the author and an investigative journalist who participated in some of the events described. Details of those involved in preparing the research appear at the beginning of this publication.

Abbreviations and terms

Bettercoal

Coal-producer assessment programme; the legal entity's historical name.

RECOSI

Responsible Commodities Sourcing Initiative – the current name of the organisation that manages Bettercoal.

CIP

Continuous Improvement Plan – an improvement plan following assessment.

ESG

Environmental, social and governance issues.

HSSE

Health, Safety, Security and Environment.

HRO

Human Rights Officer.

TAC

Technical and Advisory Committee.

HIF

Hazardous industrial facility.

MAC / dBA

Maximum allowable concentration / unit of A-weighted sound level.

Verified / awaiting verification

Different plan-implementation statuses: completion verified by an assessor, and completion reported but awaiting verification.

DOC / CLM

Stable identifiers for a document and a claim.

PDF page

File page number starting at one; printed pagination is given separately where it differs.

1. Scope of the research and research questions

Bettercoal's public report names Listvyazhnaya mine among the sites visited during the November 2017 site assessment. The SDS-Ugol group's improvement plan was agreed in May 2018. A disaster occurred at the mine in November 2021. In March 2025, the Prosecutor General's Office announced the judgment against the group's executives and the court's finding of a failure to act in July–November 2021. This sequence poses a verifiable question: what safety information was received between the assessment and the disaster, who considered it, and what measures were taken? DOC-020, p. 4–7; DOC-021.

The same question arises from the perspective of residents of mining areas. In May 2020, Uniper published an account of its September 2019 visit to Kiselyovsk and the proximity of mining operations to homes. Purchases of Russian coal continued in subsequent years. Connecting these circumstances means tracing decisions after the visit: requirements for operations, changes to plans, verification results and the buyer's commercial actions. Documents recording these transitions are precisely the subject of this research. DOC-001; DOC-003, p. 54; DOC-004, p. 74; DOC-005, p. 46, 93.

The object of the research is Bettercoal's coal-producer assessment and monitoring system, its use by Uniper and the activities of the Kuzbass operations examined. The subject is the correspondence between stated rules, documented assessments, regulatory and court information, subsequent decisions, and residents' access to that information.

The study addresses six questions. Who set the rules and controlled the procedure? Which operations were assessed, and which sites were visited? What problems were recorded in the reports, and what violations did state authorities identify? How was plan implementation monitored? How did the buyer use the information received? Could residents and journalists safely report what was happening and obtain a substantive response?

The main period is 2015–2022: Russian site assessments, the 2019 visit, the disaster and the suspension of the Russian programme. Documents from 2012 explain the organisation's origins. Documents from 2023–2026 are used to verify its continuity, current responsibilities and subsequent court findings. The geographical focus is Kemerovo Region, particularly Kiselyovsk and the operations explicitly named in the reports. Russia-wide purchasing figures retain their original scope.

The author, Natalia Zubkova, is a journalist and a participant in some of the events described. Her testimony about her work, threats, departure and subsequent life is a source in its own right. The research identifies when it is referring to her personal experience, a publication by another organisation, or a court decision. This preserves the human meaning of the story while allowing the provenance of each assertion to be checked.

The research accompanies the article ‘Responsible Coal: Documents and People’, Russian version V11. The article sets the narrative sequence. Here, the documents, methods of comparison, numerical data and questions requiring an organisational response are examined in detail. The matrix in the appendix allows readers to move from an article section to the research chapter and the relevant source page.

2. Verification method and organisation of evidence

2.1. Unit of analysis

The unit of analysis is an assertion about a specific actor, site and time. For example: assessors visited a particular mine; a court suspended particular work; a company reported a particular purchasing share. Before comparison, the legal entity, production site, event date, document date and subject of the decision are recorded. A shared group trading name is insufficient: an incident at a mine requires a separate entry establishing its inclusion in the site visit or a document establishing its relationship to the operator.

2.2. Selection and preservation of materials

The starting corpus comprises the 80 bibliography entries in V11, preserved Bettercoal public reports, Uniper corporate reports, British registry forms, court decisions, regulatory publications and material about the author’s persecution. Working dossiers are used to locate documents. A finding is based on the document located, rather than on an assertion in a dossier. Additional documents receive new numbers following the original sequence; article numbers are not reused.

SHA-256 hashes are calculated for saved files. The register separately records the original address, archived address, local filename and acquisition method. A hash allows the integrity of a saved file to be checked. Provenance is checked against the publisher’s address, details within the document and consistency with other publications. A copy of a court decision hosted by an aggregator is explicitly identified as such. An access-error page is retained in the technical log, but is not included in the corpus as the text of the document sought.

2.3. Reading and comparison

PDF text was extracted page by page. Table images and scanned forms are checked visually: the order of numbers during extraction may differ from the column order. For HTML, the title, date and substantive content are recorded. The date within a court ruling

takes precedence over an aggregator's automatically generated heading. Different publications of the same statement are grouped into a single chain of provenance.

Each main card contains a question, the claim as formulated, the document and precise location, a necessary short excerpt, its translation, the comparison result and a finding. The scope field specifies the site and period to which the finding applies. General limitations are explained here; the chapters discuss particular documents and results.

2.4. Timing and applicable rules

The violation date, inspection date, decision date and publication date are distinguished. A circumstance established by a court in 2025 concerning 2021 is entered in the 2021 chronology, with a separate note on when the court established it. A particular recipient's knowledge requires a document showing receipt or consideration of information. The Code edition is checked for each site visit; 2025 requirements are used for a present-day submission, rather than to assess the 2017 procedure.

2.5. Numerical data

Purchasing shares are transcribed with their original category and denominator. The Latvia footnote is taken into account for 2019 and 2020. For improvement plans, the sum of the three statuses is checked against the total number of items. Items reported by the producer and independently verified items are presented separately. Financial balances are taken at year-end; expenditure covers the year. These measures are given separate tables and charts.

Charts are constructed from the accompanying data tables. Bars start at zero. Missing values remain blank with an explanation. Statuses are distinguished by labels and hatching. Each line in a diagram represents a specific relationship: a role, Board membership, an assessment or ownership of a site. A supply relationship requires its own documentary basis.

2.6. Testimony, translation and personal data

Natalia's personal testimony is reproduced with attribution and a date. CPJ and RSF publications are analysed with regard to whom they interviewed and which reports they cited. Matching accounts are not treated as multiple independent eyewitnesses. No interviews, field inspections or expert examinations were conducted as part of this work. The cadastral inspection was carried out by the author of a separate document in 2019.

Short quotations are presented in the document's language and in Russian. Numbers, the subject of decisions and the degree of certainty are preserved. Public appendices exclude private addresses, contact details, information about the daughter's health, account access details and other unrelated personal data. The cadastral page is used in a separately prepared copy with personal data redacted.

The research cut-off date is 28 October 2026. The meeting and answers to questions for the picket were still awaited on that date. This work does not create evidence that new requests have been sent; the list at the end has been prepared for a submission.

3. What the sources establish

Bettercoal's public reports are the principal documents on the scope of site visits, assessment-team members, published findings and the organisation of improvement plans. The full report and public summary differ in extent. The first page of the SDS report explicitly states that the full document is confidential and available to Bettercoal members. The research therefore distinguishes published group ratings from the requested allocation of findings by site. DOC-020, p. 1.

Uniper's annual reports show how the company itself described purchases, the use of assessments and the Russia group's work. Registry forms record directors' appointments and the end of their terms. Election as Board Chair and appointment as a director are treated as separate events. Their sequence is reconstructed from several documents, while the question of when the Chair's responsibilities began is left for the addressee.

Court decisions allow the subject of a dispute, the assessment of evidence and the final decision in a particular case to be reconstructed. Where a fine was overturned, that outcome is recorded. A prosecution announcement about a judgment and the full judgment differ in extent. A later civil court decision may recount circumstances of a criminal case; where such material is used, the specific document from which they were obtained is identified.

Regulatory statements published by a trade outlet retain that transmission history. Vesti PB cites Rostekhnadzor's press service; the Union of Industrial and Environmental Safety Specialists' pages publish statements on inspections. They establish the published substance of the measures, while the official records themselves are needed to reconstruct all orders and their implementation. DOC-034; DOC-037; DOC-041.

The Volza trade database is used as a lead for requesting transaction history. Fortum's answer is considered in the context of the question about Listvyazhnaya, and the SDS group entry within its own scope. Comparing supplies requires a matching seller, buyer, period and consignment. In the supply diagram, an open question is distinguished from a confirmed link of participation in Bettercoal.

The persecution history draws on the original publication featuring the photomontage, the author's testimony, CPJ and RSF publications, and interviews from the time. A human rights organisation's publication confirms the content of its appeal and the information it gathered. Its own interviews are distinguished from retellings of reports. The illustration featuring fire and the private message threatening burning are two different sources.

The archived copy of Uniper's article is dated separately from the article itself. It preserves text that the reader can compare with the reports. The material does not state why the availability of the original address changed. The register specifies which version was preserved and how it was obtained.

4. Bettercoal and RECOSI: establishment, governance and funding

4.1. Who established the initiative

On 18 April 2012, seven founders announced Bettercoal: DONG Energy, EDF, Enel, E.ON, GDF SUEZ, RWE and Vattenfall. Fortum was named as the first new member. The press release linked the creation of a common system to mining's effects on workers, neighbouring communities and the environment. It envisaged common requirements and regular site assessments by external specialists, with results provided to member companies. BSR participated in establishing the initiative. Joachim Löchte was named as the first Chair. DOC-066, p. 1–2.

This arrangement matters for the research: buyers agreed a common way of obtaining supplier information. The original document combines a promise of changes on the ground with the sharing of results among members. Evaluating the outcome must therefore include two sides: what the assessor found at an operation, and what the buyer did with the information received.

4.2. Legal continuity

Companies House records incorporation on 28 February 2012, company number 07968009 and the form private company limited by guarantee without share capital. The name BETTERCOAL was in use until 22 November 2023; the current name is Responsible Commodities Sourcing Initiative Ltd. The register retains the same number. The coal programme continues to use the name Bettercoal. DOC-055, sections Company type, Incorporated on, Previous company names; DOC-063, p. 2.

The register gives a registered office in Hildenborough; RECOSI publishes a contact address on Shelton Street in London. These are treated as two different details in the research. The organisation's name change is accounted for in all tables, so that an

appointment to RECOSI in 2025 does not appear to be an appointment to a separate body unconnected with the earlier programme.

4.3. Allocation of responsibilities

The 2021 annual report distinguishes the Board of Directors, secretariat, Members' Committee and Technical Advisory Committee. The Board provides strategic leadership. The secretariat handles day-to-day work. The Members' Committee considers plan progress and action in cases of non-performance. The technical committee provides expert advice on the standard and procedures; it includes representatives of civil-society organisations, academia, mining companies and Bettercoal members. DOC-056, p. 13.

In October 2021, members approved governance changes. At year-end, the Board approved changes to the assessment system, including a four-year cycle and deferring the right to call a company a Bettercoal Producer until after a site assessment and agreement of a plan. These decisions affect the meaning of the status: historical profiles recording early participation must be read under the rules of their time. DOC-056, p. 12–13.

The governance page preserved on 28 October 2026 lists 11 directors. The Chair is Gerda Frans of ENGIE; the Vice-Chair is Taco Douma of RWE Generation. Uniper is represented by Nadja Wendler. The Board also lists representatives of BEW, EnBW, Enel, ResInvest Commodities, Jera Trading, ONYX Power and Vattenfall, and Executive Director Katie Warrick. The relationship register and diagram show company representation and the distinction between the Board and the Russia Working Group. DOC-014, Board of Directors.

RECOSI's Articles of Association, filed in December 2023, explain who votes and appoints the leadership. At a general meeting, each member has one vote. Associate members and programme participants may attend and speak, but may not vote. An ordinary resolution requires a simple majority of members present and voting; a special resolution requires a 75% majority. The meeting quorum is one third of the membership, rounded up. This is the allocation of voting rights under this edition of the Articles; earlier membership and rules are examined through historical documents. DOC-069, provisions 11.2, 15.2, 16.1–16.3, PDF pp. 8, 10.

The Board must comprise six–twelve directors, including the Executive Director; the Articles allow up to two independent directors. The Board gathers members' proposals, selects candidates and nominates them for election by the organisation's members. Directors are normally elected for three years. The organisation's executive head automatically serves on the Board during their tenure. The directors appoint the Chair and Vice-Chair from among themselves; they may also terminate those appointments. DOC-069, provisions 21.1–21.5, 23.1–23.4, PDF pp. 12–14.

The Board appoints the executive head, who implements the strategy approved by the Board. The Board may delegate powers to committees, approves their terms of reference and budgets, and receives their reports. Board decisions are taken by a majority where a quorum is present, or by a unanimous written decision. Reconstructing a particular decision therefore requires not only the directors' names, but also the minutes, the identities of those voting and the allocation of responsibilities then in force. DOC-069, provisions 25.1, 27–28, PDF pp. 14, 16.

4.4. Money: expenditure and balances

In its 2021 report, Bettercoal identifies annual fees from members and associate members as its funding source. That year, the organisation also moved to a model in which producers pay for site assessments. Expenditure is grouped into four items: secretariat — £395,000; assessments, plan monitoring, online platform and standard — £143,000; internal governance — £19,000; communications — £14,000. The published items total £571,000. This is calculated by adding those rows, rather than taken as a separate income figure. DOC-056, p. 22, printed pp. 42–43.

The explanation of 2021 expenditure explicitly states that there were no site assessments because of the pandemic. Programme costs included remote plan monitoring, revision of the rules and development of the platform. This expense item therefore cannot be used as the cost of Russian site visits. Allocation by country and specific assessment requires contracts, invoices and an analytical breakdown.

The 2017–2022 balance sheets show cash at bank and total assets less current liabilities at year-end. The values are brought together in a separate table and chart using consistent units. A balance sheet describes the financial position on a date; it does not replace an annual Income Statement. All sets examined contain a statement that an Income Statement was not filed under section 444 of the Companies Act 2006. DOC-070–DOC-075, p. 4 of each file.

RECOSI's new 2025 report, published on 17 August 2026, reports 14 funding members. It separately lists RECOSI expenditure of £572,950, internal governance of £25,279, the Bettercoal programme at £117,637, the gas programme at £80,422, and communications and stakeholder engagement at £49,602. These total £845,890. Producers pay for assessments, and RECOSI pays third-party assessors. These categories are shown in a separate table: the programme structure has expanded, so the figures are not joined to the four 2021 items in a continuous series. DOC-083, p. 12; DOC-087.

4.5. Chapter findings

The organisation was established by buyers, is funded through membership fees and uses producer-funded assessments. Governance, technical expertise and programme implementation are allocated to different bodies. Checking the influence of funding on a particular assessment requires contracts and documents appointing the assessor. The following chapters examine the available selection rules and specific Russian assessments; the question of who paid for each Russian assignment is included in the requests.

5. The Code, assessment and verification of implementation

5.1. Applicable rules

Bettercoal linked assessment to its own Code. In version 1.1, requirements cover lawful operations, workers' and residents' rights, safety, pollution, waste, land use and closure of operations. This version was approved on 28 June 2017. KRU's November 2015 and May 2017 visits predate that approval. The version 1.1 requirements table is therefore used for subsequent monitoring and comparison of issues, rather than as a list of rules automatically applied to earlier site visits. Fully reconstructing the earlier assessments requires the first Code edition and identification of the version specified in the assessor's contract. DOC-053, PDF 7; DOC-043, p. 5–6.

Provision 1.1 of version 1.1 requires compliance with applicable law. Provision 2.2 concerns reporting violations and grievances, and provides for protection of complainants. Provision 6.9 requires management of health and safety risks. Sections 7, 9 and 10 address effects on residents, resettlement, waste, pollution and biodiversity. These topics allow reports to be compared with specific circumstances: explosive dust in a mine working, exceedances in residential areas, residents' complaints or the condition of a waste-rock dump. Provision numbers and pages are given in the requirements table. DOC-053, p. 12, 14, 22–25, 28–29.

Version 2.0 was published in March 2021. Bettercoal's annual report describes its introduction and translation into Russian. That year, the Board also changed the reassessment cycle: the previous range of three to five years was replaced with a four-year period. The timetable in an early report and a later general procedure may therefore differ. The research distinguishes a planned reassessment date from a site visit actually carried out. DOC-065; DOC-056, p. 12, 20.

5.2. Letter of Commitment and joining procedure

Early reports explicitly explain why an assessment could precede a producer's Letter of Commitment. Such a letter became a requirement following the 2017 process revision. For example, Taldinskaya Mining Company's desktop assessment is dated October 2016, its letter August 2017 and its site visit November 2018. KRU's report records a November 2017 letter, although the first visits took place in 2015. DOC-043, p. 5; DOC-045, p. 5.

Later producer profiles sometimes give different engagement start dates. KRU's timeline begins in April 2015 and SUEK's in August 2017, while the public reports date their letters to November and September 2017 respectively. An answer requires the letters themselves and an explanation of the event each profile denotes. Site-visit and plan-agreement dates in the table are taken from the assessment descriptions; the differing early registration dates are retained among the requests. DOC-010; DOC-050.

5.3. What happened after the site visit

Assessors reviewed documents, visited selected sites and spoke with stakeholders. Findings formed the basis of a Continuous Improvement Plan, or CIP. The producer was to report implementation of items, and the assessor to verify the evidence submitted. The full report and monitoring materials were available through the members' information-sharing system. The public report provided a condensed description. This distinction is stated on the first page of the SDS report. DOC-020, p. 1, 5, 7.

In its 2019 report, Uniper stated that Russian producers were reporting on implementation of their improvement plans at least twice a year. What reports arrived between visits, what did they contain, and what decisions followed? A public summary of closed-item counts shows the resulting status, but reconstructing action at a specific mine requires the communications themselves, supporting material and the assessor's decisions. DOC-003, PDF p. 63 / printed p. 61.

The current January 2024 guidance describes the questionnaire, assessor selection, site visit, report, plan and follow-up monitoring. The October 2025 rules allocate the weighting of an assessor's proposal between the technical component — 70% — and the financial component — 30%. A producer may object to an assessor for a substantiated reason, such as a conflict of interest. These documents describe the current procedure; the corresponding historical guidance is needed for the Russian visits. DOC-061, p. 11, 19–21, 30; DOC-064, p. 7–9.

5.4. Compliance ratings and urgency — different scales

The SDS report's key contains four levels: Meets — full compliance with convincing evidence of implementation; Substantially Meets — largely compliant, but with some gaps; Partially Meets — work has begun, but implementation is incomplete; Misses — work has not begun or there is a systemic failure. For the SDS group, section 2.2, 'Reporting violations / grievances', was rated Misses, while section 6.9, 'Health and safety', was rated Partially Meets. DOC-020, p. 6, 10.

The same page states that there were no findings in the Immediate Resolutions category, requiring immediate action. This characterises the urgency of a particular category. An adverse compliance rating for a section nevertheless appears in the table. Both results must be read together. Allocating findings to mines requires the full report identifying sites and the action plan. The complete table page and its key are included in the appendices.

5.5. Complaints, their handling and consequences

The procedure dated 19 June 2025 provides for complaints about the organisation, its representatives, producers and assessors. Events more than five years old are among the grounds for refusing admissibility. On the research date, 28 October 2026, events in November 2021 still fall within that period. Questions concerning ongoing consequences and earlier events must be put to the organisation with precise dates. DOC-063, p. 2–4.

The procedure permits submissions in a local language, although English is preferred. Confidentiality may be requested; the circumstances can sometimes identify a complainant. The stated acknowledgement period is ten working days, followed by an admissibility decision. The indicative period for proposing a resolution is 60 calendar days. An appeal must be lodged within twenty working days. Review takes place within the programme's structure, involving the technical committee and Board. This describes the current mechanism; it is not evidence that a particular submission by Natalia has been considered. DOC-063, p. 3–6.

A documented example of participation ending is the announcement concerning JSC Shubarkol Komir dated 24 June 2019: following the November 2017 assessment, the parties decided to disengage because the plan could not be implemented under the strategic and economic circumstances then prevailing. The 2025 report again describes a site visit to Shubarkol in the fourth quarter, and an assessment of Black Royalty Minerals. The report states that completion of both processes was planned for 2026. This history shows why disengagement and subsequent return must be recorded as separate events. DOC-059; DOC-083, p. 17.

Chapter findings. The system provides for more than a single site visit: it includes subsequent reporting, verification of implementation and status changes. For Russian operations, this intervening documentary record is precisely what is needed to answer the research’s central question. In the requirements table, each incident is paired with a specific request concerning verification and results.

5.6. Status, logo and consequences of non-performance

The claims and logo guidance dated 23 January 2023 prohibits producers and buyers from describing participation as certification, accreditation or endorsement. The right to use the status is tied to a completed site assessment and an agreed plan, with no open Immediate Resolutions issues. Where claims are misleading, the secretariat requires correction and may restrict logo use. DOC-054, pp. 3, 5, 8–11.

The policy dated 23 April 2025 provides for disengagement in cases of missed commitments and deadlines, failure to report against the plan, false information or an insufficient response to enquiries after a risk event. The secretariat may agree deadline extensions where circumstances are explained; reminders and an appeal procedure are specified. DOC-062, pp. 3–6. To examine decisions in the Russian period, the edition then in force and decisions for each producer are requested.

6. Russian producers: sites, assessments and violations

6.1. KRU: open-pit mine visits and the 2019 inspection

Bettercoal’s public report covers six Kuzbassrazrezugol open-pit mines: Kedrovsky, Mokhovsky, Bachatsky, Krasnobrodsky, Taldinsky and Kaltansky. The list of actual visits names Krasnobrodsky in November 2015, and Bachatsky and Taldinsky in May 2017. James McNally and Yelena Borovikova of SLR Consulting conducted the assessment. The overall scope and the visit itinerary are distinguished here. DOC-043, p. 5.

The report’s findings noted weaknesses in stakeholder engagement: the list of organisations and people lacked contact details and engagement analysis. At the same time, assessors described water- and energy-management practices and environmental measures. There were no findings in the Immediate Resolutions category. These results concern the KRU assessment within its stated scope. DOC-043, p. 8–9.

On 14 May 2019, Rostekhnadzor’s press-service statement was published concerning an inspection of 70 hazardous industrial facilities at six KRU branches and the separate Salair Mining Production structural unit. More than 200 violations were identified. At Bachatsky, operation of a loading and unloading facility — transfer point No. 2 of open-pit mine No. 5 — was suspended for one month. At Krasnobrodsky, mining and drilling along the roof of the Moshchny seam of open-pit mine No. 7 were suspended for three months. The statement reports liability of the company and 142 officials. This was an inspection of several sites, while the suspensions concerned specific work. DOC-034.

Bachatsky and Krasnobrodsky therefore appear both in Bettercoal’s visit list and in the subsequent regulatory statement. The period between these dates was a period of plan implementation. What inspection information did assessors receive, which items did they change, and what evidence of remediation did they require? Answering requires the monitoring log, KRU’s communications after the inspection and the assessor’s corresponding decisions.

6.2. Vakhrushevsky field and a separate penalty overturned

Case A27-110/2019 concerns JSC Coal Company Kuzbassrazrezugol, taxpayer number (INN) 4205049090, state registration number (OGRN) 1034205040935. It examined requirements relating to coal-beneficiation waste from OUKNS-4 at the Krasnobrodsky branch’s Vakhrushevsky field and payments for 2013–2015. The company linked use of the material to land rehabilitation. The court considered the legal status of the waste’s actual placement and the payer’s duties. The first-instance decision of 16 May 2019 and the appeal of 31 July survived cassation; the cassation ruling was issued on 20 November 2019. DOC-035.

This dispute concerns waste management. It cannot be added to industrial violations from another inspection as a single numerical measure. For Bettercoal, the substantive question is how assessors checked the purpose of the material being placed, permits and subsequent court findings.

In a different case, No. 12-71/2019, Belovo District Court on 27 June 2019 overturned a 10,000-rouble fine concerning rules for operating gas-cleaning installations at the Bachatsky branch. The court terminated proceedings because the circumstances underlying the penalty had not been proved. The research records this incident as an overturned decision, rather than an established fine that remained in force. DOC-036, concluding part of the decision.

6.3. SUEK: mines visited and a preparatory working

In May 2018, assessors visited the Taldinskaya-Zapadnaya-1 and Taldinskaya-Zapadnaya-2 mines, the mines named after V. D. Yalovsky and A. D. Ruban, and the Zarechny open-pit mine. The team named comprises Paul Mitchell, Julija Menise and Tatiana Vasenko. The plan was agreed in March 2019. The report describes meetings with trade unions, city representatives and workers' associations, as well as findings concerning closure planning, engagement with business partners and biodiversity conservation. DOC-044, p. 5–6, 9.

An inspection on 13 February 2020 at JSC SUEK-Kuzbass' Ruban mine identified deposits of explosive coal dust, deficiencies in support systems and breaches of equipment explosion-protection requirements. Rostekhnadzor prohibited development of assembly roadway No. 816 — a preparatory mine working — and cargo transport along haulage roadway No. 818. The materials were referred to court. The statement was published on 25 February by the Union of Industrial and Environmental Safety Specialists, citing the regulator. DOC-037.

In the separate sanitary case No. 12-328/2019, Kemerovo Regional Court on 17 June 2019 upheld a 10,000-rouble fine against JSC SUEK-Kuzbass. The court found an exceedance of the average daily maximum permissible concentration of nitrogen dioxide in a residential area by a factor of 2.7, and of the permissible maximum night-time noise level in a bedroom by 1.3 dBA. It considered arguments about sampling points and sources of impact. One measurement beside the haul road was not used, while measurements in the residential area were found admissible. DOC-038.

In the first incident, the site matches the mine visited. In the second, the document establishes the same legal entity's liability and an impact on a residential environment; a connection to the Ruban mine cannot be inferred from the paragraphs' proximity. The request to Bettercoal must separately address industrial safety in the named working and consideration of the sanitary decision in the company's plan.

6.4. SDS-Ugol: a positive public description and the ratings table

The group report lists actual visits to the head office, the Salek and Vostochny sites in Kiselyovsk, Chernigovets and Listvyazhnaya. The wider scope list also includes other group operations. The visit took place in November 2017; the plan was agreed in May 2018. Interviewees included regulators, trade unions, civil-society organisations and residents of several settlements. Establishing who selected interviewees and how their safety was ensured requires the interview programme and confidentiality rules for that visit. DOC-020, p. 4–5.

The March 2018 corporate announcement describes the result positively. Bettercoal's public table, published in January 2019, also contains Misses for reporting violations and grievances, and Partially Meets for health and safety. These are group ratings. They must be compared with the corporate account as two parts of the published picture, preserving both the good practices noted by assessors and the outstanding work. DOC-048; DOC-020, p. 6–8.

At JSC Chernigovets' Yuzhnaya mine, Kemerovo District Court on 12 February 2018 suspended development of a transport working in the Vladimirovsky-II seam for ten days. Circumstances listed in the ruling include insufficient stone-dusting, support-system breaches and inadequate dust protection. The suspension period is linked to the prohibition of 8 February. Yuzhnaya is within the group report's overall scope, but is not named among mines actually visited. DOC-039; DOC-020, p. 4–5.

What specific problems lay behind the ratings for sections 2.2 and 6.9? When were they resolved, who verified this, and what documents confirm implementation? I request the full report and improvement plan identifying which findings relate to each mine.

6.5. Taldinskaya Mining Company

The report covers and lists as visited the Taldinskaya-Yuzhnaya and Kyrgayskaya mines. The November 2018 visit was conducted by The Dragonfly Initiative: Julija Menise, Tatiana Vasenko, Vladimir Simov and Peter Whitbread-Abrutat. The plan was agreed in September 2019. Strengths included anti-corruption measures and record-keeping; findings concerned personal protective equipment, sanitary conditions, handling oils and chemicals, and public reporting. DOC-045, p. 5, 8.

On 2 November 2020, Prokopyevsk District Court heard case No. 5-142/2020 concerning JSC Shakhtoupravleniye Taldinskoye-Yuzhnoye. Following the 27 October inspection, development of a conveyor roadway was suspended for seven days. The decision names hazardous dust, deficiencies in water sprays and supports, and fire-prevention measures. The company's representative reported that the violations had been remedied; the court ordered suspension. A document confirming subsequent verification of implementation should be requested separately. DOC-040.

6.6. KTK and TalTEK: early stage of the programme

Bettercoal profiles record KTK's participation as beginning in January 2020 and TalTEK's in February 2021. The profiles examined place them at an early stage, before a completed site assessment. Their violations are considered as information relevant to selection and initial assessment. DOC-046; DOC-047.

The inspection of PJSC Kuzbasskaya Toplivnaya Company's Karakansky-Yuzhny site ran from 28 January to 17 February 2021. The regulatory statement names 44 violations, including a danger zone that had not been properly documented and marked, and departures from project designs. A temporary prohibition was imposed from 10 February; the court suspended work in the danger zone for 60 days. The 24 February publication gives total fines of 439,000 roubles. DOC-041.

According to Rostekhnadzor's press-service statement, reproduced by PravoTEK on 12 January 2022, an inspection of LLC Razrez TalTEK on 23–28 December 2021 identified breaches of bench and safety-berm parameters. On 30 December, Novokuznetsk District Court suspended mining in the danger zone for 90 days. The full court decision is needed for the documentary appendix; the register preserves the source of the regulator's statement. DOC-042.

6.7. What the four plans show as at July 2022

KRU has 58 published items: 20 verified, 23 reported completed and awaiting verification, and 15 open. SUEK has 40: 17, 8 and 15 respectively. SDS has 49: 16, 11 and 22. Taldinskaya Mining Company has 63: 12, 12 and 39. The four profiles total 210 items: 65 verified, 54 awaiting verification and 91 open. The underlying values table and chart appear below. DOC-010; DOC-050; DOC-011; DOC-051.

The counting unit is a plan item, rather than a legal violation. Items differ in nature and severity between groups. 'Awaiting verification' is distinguished from verified implementation. Following suspension of engagement in April 2022, the profile date 'July' describes the published summary; the actual verification dates of individual items require monitoring logs.

Chapter findings. The comparisons establish specific matches of sites and legal entities, but distinct events over time. Assessors visited the named KRU open-pit mines, Ruban mine, Listvyazhnaya and Taldinskaya-Yuzhnaya. Yuzhnaya is within the group scope. KTK and TalTEK were at an early stage. This approach allows questions about oversight to be addressed to the precise procedure that existed at the time of an event.

7. Listvyazhnaya: from assessment to court findings

The mine's legal entity is LLC Shakhta Listvyazhnaya. The Prosecutor General's Office announcement of 25 March 2025 identifies it as a subsidiary of the SDS-Ugol holding company. Bettercoal's public report shows a visit to this mine in November 2017 and agreement of a group plan in May 2018. The relationship therefore runs through a specific site, rather than merely through the holding company's name. DOC-021; DOC-020, p. 4–5.

7.1. Sequence of events

Bettercoal's report scheduled the next assessment for November 2022. Plan monitoring was envisaged between visits. The 2021 annual report states that the pandemic prevented site assessments that year; engagement and review of materials continued remotely. These details describe how the organisation worked. The mine requires its own record of checks, communications and decisions. DOC-020, p. 5, 7; DOC-056, p. 3–4.

An explosion occurred on 25 November 2021. The Emergencies Ministry recorded 51 deaths, including five mine rescuers. DOC-089, PDF 34. The following day, Bettercoal reported contact with SDS, expressed condolences and stated its intention to establish the causes and necessary preventive measures. In December, the organisation held a webinar with leading independent assessors on Russian producers' plan statuses, to help buyers understand specific risks and improvement work. DOC-021; DOC-024; DOC-056, p. 20.

On 28 April 2022, Bettercoal announced the suspension of its Russian programme against the backdrop of Russia's invasion of Ukraine and associated risks. Programme-organised plan verification and the ability to use the status on the previous basis ended. The website publication is dated 3 May and contains the 28 April statement. These dates are distinguished in the chronology. DOC-079.

7.2. Judgment against the executives

According to the Prosecutor General's Office, Kemerovo's Central District Court found deliberate inaction by executives in July–November 2021: they failed to take the measures needed to bring the mine into compliance with industrial safety requirements. Mikhail Fedyaev is identified as the group's Board Chair and a shareholder, Gennady Alekseev as Chief Executive Officer and a Board member, and Anton Yakutov as Technical Director. Alekseev received five years and three months' imprisonment, Yakutov five years, and Fedyaev a suspended sentence of three years and six months. DOC-021.

On 21 April 2025, Interfax, citing the courts' press centre, reported that the judgment became final on 17 April and that no appeals had been lodged. Later civil decisions also refer to the final judgment against the executives. Kommersant's article records the

defence's position, disputing causation and the extent of managerial duties. The register distinguishes the official announcement, court document and journalistic account of the proceedings. DOC-022; DOC-023; DOC-084; DOC-085.

7.3. What the 2026 civil cases add

Kemerovo Regional Court decisions dated 26 March and 2 April 2026 address compensation claims arising from deaths. The court recounts material from the technical investigation and criminal cases. In particular, it mentions a final judgment concerning breaches of the rules for operating the Mikon III atmospheric and gas monitoring system. This is a separate documentary route to the issue of gas monitoring, alongside the general judgment against the executives. DOC-085, case No. 33-2951/2026; DOC-084, case No. 33-2762/2026.

Dates are taken from the decisions' text: the aggregator's headings show 25 March and 1 April respectively. The appendices do not reproduce families' personal circumstances, individual claim amounts or medical information. Verifying the causes of the accident requires the full technical investigation report and court decisions concerning the monitoring system. The civil decision preserves their account within the scope of the case considered.

7.4. What documentary record is needed between 2018 and 2021

Required: the mine-specific section of the improvement plan; all implementation reports with dates; assessors' observations on the information submitted; information about official inspections received by Bettercoal; decisions on deadline changes and extraordinary checks; December webinar materials; and results of the review promised after the accident. For each document, its recipient and receipt date matter. Publication of a court finding in 2025 concerns events in 2021, but does not replace evidence of what information assessors held earlier.

Chapter findings. The documents connect one mine with the 2017 visit, the 2018 plan, the accident and the court-established failure of executives to act in 2021. Bettercoal's public response and the December webinar are known. A substantive organisational answer must disclose checks and decisions between these points, and the results of the subsequent review.

8. Uniper: visit, purchases and decisions by governing bodies

8.1. Why a buyer needs assessments

In its 2019 report, Uniper explicitly explains its use of Bettercoal information: assessments form part of environmental, social and governance risk assessment and supply-chain monitoring. Printed page 52 / PDF page 54 contains both this statement and purchasing data. Printed page 61 / PDF page 63 refers to Russian producers' reporting on plans at least twice a year. This is a documented connection between the procedure and the buyer's work. DOC-003.

8.2. What the company saw in Kiselyovsk

Uniper's article 'The dilemma of investing in social and environmental remediation activities' describes a visit to Kiselyovsk in September 2019 as part of a Bettercoal mission. The company describes the proximity of mining to housing and the short time spent in the town. A longer conversation in Chuvashka was a separate part of the itinerary. The archived copy preserves discussion of resettlement, rehabilitation of disturbed land and the difficulties of choosing measures. DOC-001, May 2020 publication; archived snapshot dated 18 June 2020.

Uniper also wrote that the most severe impacts involved operations with which neither it nor Bettercoal engaged directly. This position should be read alongside its own description of the town. Which sites were meant, which suppliers were checked after the visit, and what changes were required? Answering requires the itinerary, site list, final memorandum and subsequent decisions.

The cadastral report dated 3 July 2019 provides a separate measurement. On 26 April, the engineer inspected a residential house and the nearest waste-rock dump; the distance from the nearest foot of the dump to the footprint of the house inspected was 461.98 metres. This measures a specific inspected house. The complete page, with personal data redacted, is appended to the research. DOC-080.

8.3. TDI and information about intimidation

TDI Sustainability's study was prepared for Bettercoal's Russia Working Group, established in December 2018. The document lists ENEL, ENGIE, ESB, Fortum, RWE, Uniper and Vattenfall. The work included a review of Russian- and English-language

material and a visit in September 2019. The authors described their task as gathering and explaining the context of reports by civil-society organisations and researchers. DOC-002, p. 2–3.

Page 4 states: “Finally, according to the rights group, FERN, intimidation of local environmental campaigners by coal companies is reportedly prevalent in Kuzbass.” The information is attributed to FERN; TDI relays it. The sentence concerns a regional problem. The recommendations include grievance mechanisms and the ability to express concerns safely. DOC-002, p. 4, 6–7.

The question for those commissioning the work is how this information was translated into action: who was responsible for interviewees’ safety, how complaints were checked, and what measures could be taken. The report’s publication date — February 2020 — is distinguished from the 2019 visit and the threats against Natalia reported later.

8.4. Three purchasing figures

Shares of Uniper’s direct contractual purchases were 35.1% for 2019, 29.9% for 2020 and 22.6% for 2021. The first two categories include Latvia; the third is labelled Russia. The chart uses separate bars with full category labels. The percentages describe purchases under direct contracts, rather than company profits. DOC-003, p. 54; DOC-004, p. 74; DOC-005, p. 46, 93.

The 2022 annual report states that Russian purchases ended in August. This means that purchases continued after the visit and into part of 2022. Assessing a specific consignment requires a contract, legal entities and origin information. Country-level reporting does not allocate purchases among mines. DOC-006, PDF p. 41 / printed p. 37.

8.5. What the 94.48% result means

On 19 May 2021, under agenda item 4 at Uniper’s meeting, shareholders approved the Supervisory Board’s actions in 2020. Votes in favour totalled 305,116,131 out of 322,950,342 valid votes — 94.48%; votes against totalled 17,834,211. The percentage’s denominator is valid votes on this item. The document states the subject of the vote alongside the result. DOC-081, p. 1.

The critical shareholders’ counterproposal opposed approval, including for reasons relating to coal-chain responsibility and human rights. It shows the substance of the public criticism, while the official record shows the subject and outcome of the meeting’s decision. Both documents, read separately, matter when relating this to purchases. DOC-019, p. 2–3.

8.6. Suppliers: what can be shown in a diagram

Question 39 from Fortum shareholders in 2022 concerns Listvyazhnaya. The answer states that Fortum and Uniper had not bought coal from this supplier in recent years; years and a legal entity are not separately specified. Volza lists the SDS group among suppliers to Uniper Global Commodities SE, but the public profile does not disclose comparable dates or mines of origin. These records are therefore placed in the table of commercial relationships to be checked. DOC-052, p. 16; DOC-077.

I ask Uniper to disclose its purchasing history with SDS-Ugol: years, sellers' legal entities, volumes and mines of origin. The same details are needed for KRU and other names in the trade directory. Material concerning other global suppliers must undergo the same checks before being added to the diagram.

Chapter findings. Uniper's own documents connect the visit, public observations, use of assessments and continued purchases by country. The vote concerns approval of the Supervisory Board's actions. The next level of verification is supplier-specific decisions and the origins of consignments.

9. People, responsibilities and documented relationships

In this chapter, a line between two names always represents a defined relationship: employment, Board membership, conducting an assessment or ownership of a production site. The period is stated beside the source. Commercial information still requiring consignment-specific documents is placed in a separate requests table.

9.1. Frank Plümacher

The imprint of Uniper's 2017 report identifies Plümacher as Executive Vice President HSSE & Sustainability. The report was published in May 2018. HSSE encompasses health, occupational safety, security and environmental protection; Sustainability refers to sustainable development. The document confirms this professional role before the Kiselyovsk visit. The precise start date must be established from the appointment, rather than the reporting year. DOC-078, final PDF page, p. 17.

Uniper's 2019 report dates his election as Bettercoal Board Chair to April and describes a three-year appointment. Registry form AP01 records his appointment as a director on 18 June 2019. Election as Chair and appointment as a director are different events. I request clarification of the sequence of these decisions and the date on which he began exercising the Chair's responsibilities. DOC-003, p. 54; DOC-076, p. 1.

Plümacher's governance involvement is reflected in signed accounts. The 2019 balance sheet was approved on behalf of the Board on 30 June 2020, and the 2020 balance sheet on 20 May 2021. The pages bear the name F. Pluemacher. The signature confirms approval of the accounts; specific decisions about Russian mines must be sought in Board minutes and supporting materials. DOC-072, p. 4; DOC-073, p. 4.

In the foreword to Bettercoal's 2021 annual report, he speaks as Chair. A short statement defines his public position: "Site assessments are central to the work of Bettercoal". The same foreword states that the pandemic prevented teams from returning to sites in 2021. The Board updated the Code and rules, while the organisation continued remote work on plans. This provides a specific question for the Chair: how was the adequacy of that monitoring assessed, and when was the need for an extraordinary site visit discussed? DOC-056, p. 3–4, 12.

Another document reveals Uniper's practical involvement in the secretariat's work. The Dutch Coal Covenant report for September 2017–October 2018 describes seconding a Uniper employee for two years to support improvement-plan monitoring. It also states that Uniper's Supervisory Board regularly received information on responsible coal

sourcing. The document publishes Plümacher's comment on a visit to Colombia. This was a separate visit; its information is not transferred to the Russian delegation. DOC-088, p. 24.

Form TM01 records the end of his directorship on 27 November 2025. On 3 December, RECOSI announced Gerda Frans as the new Chair and thanked Plümacher for six years of leadership. At the research date, Uniper presents him as Head of HSSE & Sustainability and Human Rights Officer. In his published statement, he links this work to early identification, assessment and mitigation of human rights and environmental risks in the company's value chains. DOC-068; DOC-013; DOC-015.

Why he is an addressee. Plümacher connects historical leadership of Bettercoal during the visit and disaster with Uniper's current human rights function. The documents provide grounds to ask him about Board work, materials received, risk assessment and arrangements for considering a submission today.

1. What Russian-plan reports reached the Board in 2019–2021, and which matters were discussed with your involvement? Please provide the minutes and appendices for those items.
2. How did the Board assess remote monitoring in 2021? What information could trigger an extraordinary visit, and was such a need considered for SDS?
3. What decisions were taken after the disaster and the December webinar? Where are the results of the promised review?
4. Since what date have you been Human Rights Officer? Who will consider Natalia's submission, within what time frame and with what written outcome?

9.2. Nadja Wendler

The EGPES 2024 conference report identifies Wendler as Vice President, Sustainability at Wintershall Dea AG. PDF page 15 contains her statement: "Governments, industry leaders, innovators, and communities must unite in a shared mission for a sustainable future, leaving no one behind." DOC-058, PDF p. 15 / printed pp. 26–27.

By 3 December 2025, RECOSI described Wendler as Uniper's Senior Vice President Sustainability and a new Board member. The registry form gives her appointment as a director as 27 November. Her start at Uniper is a separate date; establishing it precisely requires the appointment document. Her 2025 role is not projected back onto Russian events in 2017–2022. DOC-067, p. 1; DOC-013.

In the current structure, the Board is responsible for strategic governance, while the secretariat handles day-to-day work. Wendler represents Uniper on the Board and heads the company's sustainability function. This offers two routes for a submission: consideration of historical risks within Uniper, and discussion of document disclosure and procedures at RECOSI. DOC-014.

Why she is an addressee. The questions for Wendler concern present-day work on the consequences of past purchases and residents' participation in considering a submission. Her published call to take communities into account is compared with the specific request to hear Natalia and provide a documented answer.

1. When did you take charge of sustainability at Uniper, and what responsibilities did you receive for historical supply-chain risks and residents' submissions?
2. Are you prepared to raise disclosure of Russian plans and monitoring with RECOSI's Board, assign a responsible person and give a deadline?
3. How will residents who remained with the consequences of mining after purchases ended participate in the process?
4. What safe methods of submitting testimony and receiving feedback are available to Natalia today?

9.3. Other participants in governance and assessments

Joachim Löchte is named as Chair in the initiative's 2012 founding announcement. Gerda Frans, Head of ESG at ENGIE Global Energy Management & Sales, was announced as RECOSI Chair in December 2025. Taco Douma of RWE Generation remained Vice-Chair. Katie Warrick heads the organisation's executive work. These roles differ: the Board governs and oversees, while executive management runs activities. DOC-066; DOC-013; DOC-014.

Russian assessment-team membership is taken from the reports themselves: James McNally and Yelena Borovikova — KRU; Paul Mitchell, Julija Menise and Tatiana Vasenko — SUEK and SDS; Julija Menise, Tatiana Vasenko, Vladimir Simov and Peter Whitbread-Abrutat — Taldinskaya Mining Company. Assessment participation means carrying out the stated work. Establishing who later verified a particular plan item requires a task-allocation log. DOC-043, p. 5; DOC-044, p. 6; DOC-020, p. 5; DOC-045, p. 5.

Uniper's published account of Kiselyovsk confirms the participation of company representatives. The delegation's individual members, allocation of roles and list of recipients of the final report remain the subject of a specific request. The visit diagram does not substitute named executives for unidentified participants.

9.4. How to read the diagrams

Diagram A shows professional appointments and governing bodies by date. Diagram B shows the buyer's confirmed use of assessments and purchases by geographical category; potential seller-buyer pairs are listed separately for verification. Diagram C connects

producers with sites visited. Diagram D places changes in time. Arrows represent their labelled relationship or a procedural sequence; the disaster's causal links are determined by court and technical documents, rather than arrow direction.

Chapter findings. Governance and professional relationships, assessment-team membership, sites visited and Uniper's use of the system are confirmed. A commercial connection to a particular Russian mine requires supply documents. An executive's personal involvement in a decision requires minutes, a signature, an instruction or a dated communication.

10. Natalia Zubkova: work, pressure and consequences



Natalia is the author of the appeal and a direct participant in this part of the story. Her words of 28 October 2026 are reproduced in the appendix in full, following the agreed article version. Below, events are compared with publications from the relevant time. Personal testimony describes lived experience; external publications show when information became public and who sought its verification.

Natalia Zubkova

10.1. Residents' appeal and material available to read

Kiselyovsk residents' appeal to the Prime Minister of Canada was published by Novosti Kiselyovska on 8 June 2019. Ecodefense's 2020 report cites this video in notes 17 and 75. In the preserved Russian version, these are PDF pages 5 and 15. This traces the subsequent report's use of material from Natalia's outlet. Establishing precisely what the delegation received before September 2019 requires correspondence about the transfer of material. DOC-008, p. 5, 15.

On 26 August 2019, Sibir.Realii reported that the mayor had contacted prosecutors over the journalist's interviews with residents. The article concerns pressure surrounding information gathering and journalistic work. A letter to prosecutors must be distinguished from the opening of proceedings and a court decision. DOC-025.

10.2. Threats and a publication featuring fire

In its publication of 3 March 2021, CPJ — the Committee to Protect Journalists — relays Natalia's account of anonymous threats to burn her alive in August 2020 and her submission to the Investigative Committee. On 21 August 2020, the Bez Tsenzury blog published 'An "attempt on Zubkova's life" is being prepared'. The page contains a montage featuring fire, and the text ridicules reports of threats. The account name and platform are established from the page; identifying the person behind the account requires a separate document. DOC-026; DOC-032.

The blog publication and the original threatening message are two different documents. The image included in the appendix shows the nature of the public harassment. Information on the correspondence and its dates relies on specific preserved excerpts and Natalia's publication 'Two Realities'. This work does not claim to have verified the entire set of 27 screenshots. DOC-033.

10.3. Attack, departure and closure of the outlet

CPJ reported that an unidentified person attacked Natalia while she was walking her dog on 25 February 2021 and threatened her and her children. The organisation spoke to Natalia by telephone. This publication is a dated record of her account and of a professional organisation's appeal for the journalist's protection. It also describes its own requests for comment. Those requests were made by CPJ, not by the author of this research. DOC-026.

On 10 March 2021, Reporters Without Borders called on the federal authorities to protect Natalia and conduct an independent investigation. The article mentions her 6 March video appeal concerning complaints to the police, FSB and Investigative Committee. The organisation offered its own assessment of persecution by local authorities. CPJ's and RSF's accounts of the same attack are not treated as two independent eyewitness testimonies. DOC-027.

On 26 April 2021, Sibir.Realii reported that Natalia had left Russia roughly a week earlier. The outlet included both her explanation of her fear for her safety and the Investigative Committee's position that it had visited her as a victim in a case concerning obstruction of journalistic work. On 23 May, Novosti Kiselyovska's closure was reported, for the editor's family's safety and to enable other projects. DOC-028; DOC-029.

10.4. What is compared with Bettercoal's work

The timeline first places public appeals and the 2019 visit, followed by the February 2020 TDI report, August 2020 threats, and reports of an attack and departure in 2021. This sequence determines the questions about knowledge. What material was received before the visit? Who tracked subsequent publications? Were retaliation risks considered during conversations with residents and grievance handling? Each answer requires a document with a receipt date and a specific action.

The Black Snow press kit is used as a description of the film and the director's project. This work does not claim to have viewed the entire film or checked scenes against timestamps. DOC-030.

Chapter findings. The story includes specific dated reports of pressure, threats, an attack, forced departure and closure of an outlet. External publications record Natalia’s account and organisations’ responses. Establishing perpetrators and instructions requires investigation materials. Assessing buyers’ and Bettercoal’s responses requires documents showing receipt of information and subsequent measures.

11. Discussion and conclusions

11.1. What the comparisons reveal

The research establishes several different relationships. The legal register links Bettercoal and RECOSI through one registration number. Annual reports and appointment forms connect executives with governing bodies. Public assessment reports identify Russian operations and mines actually visited. Court decisions and regulatory statements record specific circumstances at those operations. Uniper’s reporting shows use of assessments and purchases by country. Each link has its own source.

The principal analytical result is the ability to examine not only the site-visit itinerary but also the work between visits. Bettercoal provided for plans and implementation monitoring; Uniper reported regular updates. Requesting half-yearly reports, assessors’ decisions and Board materials therefore tests the stated procedure against specific examples. For Listvyazhnaya, this record is particularly important between May 2018 and November 2021.

11.2. What results the organisation presents

The July 2022 summaries give 65 verified items out of 210 in four Russian plans. They allow the published status to be checked, but do not openly allocate every item to a mine or provide evidence of its implementation. As at 31 December 2025, RECOSI’s report lists 279 items: 66 closed, 30 awaiting verification and 183 open. They concern six producers. The report was published on 17 August 2026 (DOC-087). DOC-083, p. 18.

The 2022 and 2025 figures are not combined into a single ‘progress’ series: they concern different producers and periods. Similarly, RECOSI’s 2025 expenditure includes the gas programme and expanded organisational activities; it cannot be presented directly as growth in spending solely on Russian coal assessment. The financial table retains the category names.

11.3. Governance, transparency and residents' participation

Buyers participate in the organisation's governance and funding, receive assessment results and use them for their own supply checks. Producers implement plans and pay for assessments under current rules. Public summaries give residents part of the results. To verify a change in conditions beside a particular house or the safety of a particular mine working, a resident needs a more detailed operation-specific report and action plan. This is a practical question of information access.

Natalia's story poses a second question: how to obtain this information and report a problem safely. The Code includes grievance handling, the TDI report relays information about intimidation, and CPJ and RSF publish reports about a particular journalist. Completing the comparison requires records of incoming reports, procedures for protecting interviewees and decisions concerning them.

11.4. Final answers

Who governed and paid? Corporate members established and funded the organisation; leadership and membership changes are confirmed by the register and reports. A payer-by-payer breakdown of contributions requires disclosure.

What was assessed? Public reports provide overall scope and visit lists. They show findings and a number of good practices. The site table preserves the distinction between the entire group and a mine visited.

How were subsequent violations taken into account? Official inspections and court decisions, periodic plan reporting and certain Bettercoal public responses are known. Reconstructing specific action on each violation requires monitoring logs and dated decisions.

What changed in purchasing? Direct contractual purchases of Russian coal continued after the visit; Uniper reported that they ended in August 2022. The origins of individual consignments require contracts and shipping documents.

What happened to the journalist? Her testimony, publications about threats, the attack and departure, and professional organisations' appeals have been preserved. The question for companies is when they received this information, who considered it, and how they ensured the safety of residents' reports.

Table 1. Events, inspections, decisions and publications

The date on which an organisation received information requires separate evidence; publication does not replace an incoming document.

Event: date	Published	Participant	What happened	Document	Significance
28.02.2012	Registry entry	Bettercoal Ltd	Incorporation, No. 07968009	DOC-055	Legal starting point
18.04.2012	18.04.2012	Seven companies; Bettercoal	Announcement establishing the initiative	DOC-066	Founders and stated aims
November 2015; May 2017	Public assessment report	KRU; SLR	Visits to three open-pit mines	DOC-043, p. 5	Before Code 1.1 approval
28.06.2017	Code 1.1	Bettercoal	Version 1.1 approved	DOC-053	Approval date; applies from publication
November 2017	09.01.2019	SDS; Bettercoal	Site visit, including Listvyazhnaya and Vostochny	DOC-020, p. 4–5	Visit to specific sites
12.02.2018	Ruling text	Kemerovo District Court; Yuzhnaya	Development suspended for 10 days	DOC-039	Incident within the group's overall scope
May 2018	09.01.2019	SDS; Bettercoal	Improvement plan agreed	DOC-020, p. 5	Start of the plan-monitoring period
May 2018	Public assessment report	SUEK; assessors	Visit to five sites	DOC-044, p. 5–6	Itinerary including Ruban mine
November 2018	Public assessment report	Taldinskaya Mining Company	Visit to two mines	DOC-045, p. 5	Assessment itinerary
April / 18.06.2019	2019 report / AP01	Frank Plümacher	Election as Chair / appointment as director	DOC-003, p. 54; DOC-076	Different roles and registration events
26.04.2019	03.07.2019	Cadastral engineer	Inspection of a house and waste-rock dump; 461.98 m	DOC-080	A specific house, not the author's flat

Event: date	Published	Participant	What happened	Document	Significance
2019 inspection	14.05.2019	Rostekhnadzor; KRU	More than 200 violations; specific work suspended	DOC-034	After the 2015–2017 visits
08.06.2019	08.06.2019; cited in 2020	Residents; Novosti Kiselyovska	Appeal to the Prime Minister of Canada	DOC-008, p. 5, 15	Residents' public material
17.06.2019	Decision text	Kemerovo Regional Court; SUEK	Fine for air pollution and noise upheld	DOC-038	Separate legal entity and measurements
27.06.2019	Decision text	Belovo District Court; KRU	Gas-cleaning fine overturned	DOC-036	Overturning retained in the findings
September 2019	May 2020	Uniper representatives; Bettercoal	Visit to Kiselyovsk	DOC-001	Subsequent public account of the visit
13.02.2020	25.02.2020	Rostekhnadzor; Ruban mine	Development and cargo transport prohibited	DOC-037	Specific preparatory work
September 2019 and source review	February 2020	TDI; working group	Report on social and environmental problems	DOC-002	Reports of intimidation included
August 2020	21.08.2020; 03.03.2021	Natalia; blog; CPJ	Threats in testimony; publication featuring fire	DOC-032; DOC-026	Threat distinguished from publication
02.11.2020	Ruling text	Prokopyevsk District Court	Development suspended at Taldinskaya-Yuzhnaya	DOC-040	Seven days
28.01–17.02.2021	24.02.2021	Rostekhnadzor; KTK	44 violations, danger-zone work suspended	DOC-041	Early stage of the programme
25.02.2021	03.03 and 10.03.2021	Natalia; CPJ; RSF	Reports of an attack and threats	DOC-026; DOC-027	Dated external publications
Roughly one week before 26.04.2021	26.04.2021	Natalia	Reported leaving Russia	DOC-028	Date interval retained
19.05.2021	Official meeting result	Uniper shareholders	94.48% in favour of approving the Supervisory Board's actions	DOC-081, p. 1	Subject: actions in 2020

Event: date	Published	Participant	What happened	Document	Significance
July–November 2021	25.03.2025	SDS executives; court	Period of inaction established by the court	DOC-021	Circumstance date distinguished from publication
25.11.2021	State report for 2021	Listvyazhnaya	Disaster, 51 deaths	DOC-089, PDF 34	Event and subsequent judicial assessment
26.11.2021	26.11.2021	Bettercoal	Contact with SDS, statement about reviewing the causes	DOC-024	Public response
December 2021	Report for 2021	Bettercoal; lead assessors	Webinar on Russian plans	DOC-056, p. 20	Materials and decisions requested
30.12.2021	12.01.2022	Court; Razrez TalTEK	Danger-zone work suspended for 90 days	DOC-042	Regulator's statement; full decision requested
28.04.2022	03.05.2022	Bettercoal	Russian programme suspended	DOC-079	Overall programme status
July 2022 summary	July 2022	Four producers	Plan status published	DOC-010, 011, 050, 051	Individual verification dates require a log
August 2022	2022 annual report	Uniper	End of Russian coal purchases	DOC-006, p. 41	Company's commercial action
22.11.2023	Registry entry	Bettercoal / RECOSI	Change of legal name	DOC-055	Registration number retained
25.03.2025	25.03.2025	Central District Court; Prosecutor General's Office	Judgment against three executives	DOC-021	Circumstances of July–November 2021
19.06.2025	Procedure document	RECOSI	New complaints procedure	DOC-063	Five-year criterion and deadlines
27.11.2025	December 2025	Plümacher; Wendler; RECOSI	End / start of a director's term	DOC-067; DOC-068	Historical and current roles distinguished
31.12.2025	17.08.2026	RECOSI	Results as at 2025	DOC-083, p. 18; DOC-087	279 items, a different sample

Event: date	Published	Participant	What happened	Document	Significance
26.03; 02.04.2026	Court decision texts	Kemerovo Regional Court	Civil appeals concerning consequences of the disaster	DOC-085; DOC-084	References to technical and criminal-case materials
28.10.2026	28.10.2026	Natalia	Preparing a submission for the 29 October picket	Personal testimony	Answers and meeting still awaited

Table 2. Producers, legal entities and sites

Site names are taken from the reports; the precise legal entity in a regulatory case is given separately.

Producer	Legal entity	Scope	Actual itinerary	Assessors	Edition	Sources
KRU	JSC Coal Company Kuzbassrazrezugol; INN 4205049090	Six group open-pit mines	Krasnobrodsky — November 2015; Bachatsky and Taldinsky — May 2017	SLR Consulting: James McNally, Yelena Borovikova	Early version before 1.1; precise edition requested	DOC-043, p. 5; DOC-035
SUEK	JSC SUEK-Kuzbass — entity in regulatory cases; SUEK group assessment	Several regions and group sites	Taldinskaya-Zapadnaya-1 and -2, Yalovsky, Ruban, Zarechny; May 2018	Paul Mitchell, Julija Menise, Tatiana Vasenko	1.1 published by the visit date; contractually specified edition requested	DOC-044, p. 5–6; DOC-037, 038
SDS-Ugol	SDS-Ugol holding company; LLC Shakhta Listvyazhnaya; JSC Chernigovets	Group, including Yuzhnaya and other sites	Head office, Salek / Vostochny, Chernigovets, Listvyazhnaya; November 2017	Paul Mitchell, Julija Menise, Tatiana Vasenko	1.1 published by the visit date; allocation of findings to individual mines requested	DOC-020, p. 4–5; DOC-021; DOC-039
Taldinskaya Mining Company	JSC Shakhtoupravleniye Taldinskoye-Yuzhnoye — entity in the court decision	Taldinskaya-Yuzhnaya and Kyrgayskaya	Both mines; November 2018	The Dragonfly Initiative: Julija Menise, Tatiana Vasenko, Vladimir Simov, Peter Whitbread-Abrutat	1.1 published by the visit date; contract requested	DOC-045, p. 5; DOC-040
KTK	PJSC Kuzbasskaya Toplivnaya Company	Early-stage participation from January 2020	No completed visit stated in the profile; regulatory inspection — Karakansky-Yuzhny	Not stated	Letter and applicable early-stage requirements requested	DOC-046; DOC-041
TalTEK	LLC Razrez TalTEK — entity in the regulatory statement	Early-stage group participation from February 2021	No completed visit stated in the profile	Not stated	Letter and applicable early-stage requirements requested	DOC-047; DOC-042

Table 3. Code 1.1 and incidents in Russia

DOC-053: version 1.1 approved on 28.06.2017. This table does not apply it retrospectively to KRU's 2015 and May 2017 visits.

Provision / page	Incident	Document	Known response	What needs to be established
1.1: legal compliance; p. 12	KRU: 2019 inspection, work suspensions	Regulatory statement DOC-034	Bettercoal's decision on the statement requested	Which orders were included in monitoring, and when was implementation verified?
2.2: reporting violations and grievances; p. 14	SDS: Misses for 2.2	Ratings table DOC-020, p. 6	Group plan; mine-specific measures requested	What grievance-mechanism deficiencies were remedied, and who verified this?
6.9: health and safety; p. 22	SDS: Partially Meets; Listvyazhnaya — 2017 visit and 2021 disaster	DOC-020; DOC-021; DOC-024	Post-disaster statement; December 2021 webinar	Which items concerned the mine, and what checks preceded the accident?
6.9: safety; pp. 22–24	Ruban mine: coal-dust explosion protection, 2020	DOC-037	Specific work prohibited, materials referred to court	What evidence of remediation did the assessor consider?
6.9: safety; pp. 22–24	Taldinskaya-Yuzhnaya: development, 2020	DOC-040	Seven-day court-ordered suspension	When was remediation confirmed and the plan changed?
7.1.6: resettlement and participation; p. 25	Kiselyovsk: mining close to homes	DOC-001; DOC-080	Observations and proposed measures published	What specific projects were agreed with residents and implemented?
9.2: waste; p. 28	Vakhrushevsky field and beneficiation waste	DOC-035	2019 court decisions	How is the court finding reflected in KRU's plan?
9.3: air and dust; p. 29	SUEK: NO ₂ exceedance in a residential area	DOC-038	Fine upheld	What measures and follow-up measurements demonstrate improvement?
10: biodiversity; p. 29 onwards	SUEK: findings on environmental protection	DOC-044, p. 9	Group plan	Which sites and indicators were used for verification?

Table 4. Underlying data: improvement plans

Corporate groups' plan items; statuses published in July 2022. Totals: 210 / 65 / 54 / 91.

Producer	Total	Verified	Awaiting verification	Open	Date / document
KRU	58	20	23	15	July 2022; DOC-010
SUEK	40	17	8	15	July 2022; DOC-050
SDS-Ugol	49	16	11	22	July 2022; DOC-011
Taldinskaya Mining Company	63	12	12	39	July 2022; DOC-051

Table 5. Underlying data: Uniper purchases

Values transcribed without recalculation. Tonnage and profits were not calculated.

Year	Category	Share	Unit / scope	Source
2019	Russia, including Latvia	35.1%	% of direct contractual purchases	DOC-003, PDF 54 / printed 52
2020	Russia, including Latvia	29.9%	% of direct contractual purchases	DOC-004, PDF 74
2021	Russia	22.6%	% of direct contractual purchases	DOC-005, PDF 46, 93

Table 6. Balance-sheet figures, 2017–2022

Values read from the original balance-sheet pages. These are balances at a date, not annual income.

At 31 December	Cash at bank and in hand, GBP	Total assets less current liabilities, GBP	Source / page
2017	334 450	231 696	DOC-070, PDF 4
2018	489 895	228 144	DOC-071, PDF 4
2019	338 480	310 078	DOC-072, PDF 4
2020	247 423	241 092	DOC-073, PDF 4
2021	223 482	172 103	DOC-074, PDF 4
2022	295 022	236 094	DOC-075, PDF 4

Table 7. Published expenditure: different reporting structures

Sum of rows for 2021: GBP 571,000; 2025: GBP 845,890. Categories changed between years; 2025 includes the gas programme.

Year	Original indicator name	Explanation	GBP	Source / PDF
2021	Secretariat	Secretariat	395 000	DOC-056, 22
2021	Assessments, CIP Monitoring, Online Platform, Bettercoal Standard	Assessments, plan monitoring, online platform and standard	143 000	DOC-056, 22
2021	Internal Governance	Internal governance	19 000	DOC-056, 22
2021	Communications	Communications	14 000	DOC-056, 22
2025	RECOSI Costs	RECOSI expenditure: secretariat, office management and programme development	572 950	DOC-083, 12
2025	Internal Governance	Internal governance	25 279	DOC-083, 12
2025	Bettercoal Programme	Bettercoal programme	117 637	DOC-083, 12
2025	RECOSI Gas Programme	RECOSI gas programme	80 422	DOC-083, 12
2025	Communications and Stakeholder Engagement	Communications and stakeholder engagement	49 602	DOC-083, 12

Table 8. Register of relationships and responsibilities

Each row establishes only the named relationship type. Appointments, membership, assessment payment and supply are recorded separately.

Person / organisation	Other party	Relationship type	Period	Document	Page	Established facts
Frank Plümacher	Uniper	Served as EVP HSSE & Sustainability	2017 report, published May 2018; also 2019 report	DOC-078; DOC-003	17; 54	Professional job title; start date requires an appointment record
Frank Plümacher	Bettercoal Board of Directors	Elected Chair	April 2019; stated three-year term	DOC-003	54	Election described by Uniper
Frank Plümacher	Bettercoal / RECOSI legal entity	Appointed director	18.06.2019; term ended 27.11.2025	DOC-076; DOC-068	1; 1	Dates in registry forms AP01 and TM01
Frank Plümacher	Bettercoal	Approved financial statements on behalf of the Board	30.06.2020; 20.05.2021	DOC-072; DOC-073	4; 4	F. Pluemacher signature on 2019 and 2020 balance sheets
Frank Plümacher	Uniper	Human Rights Officer	Confirmed at the research date	DOC-015	Human Rights Officer section	Public role description; appointment date requested
Nadja Wendler	Wintershall Dea AG	Vice President Sustainability	EGYPES 2024	DOC-058	15	Position and published statement
Nadja Wendler	Uniper	Senior Vice President Sustainability	Confirmed by 03.12.2025 announcement and current page	DOC-013; DOC-014	HTML	Precise start date requested
Nadja Wendler	RECOSI Board of Directors	Appointed director; represents Uniper	27.11.2025	DOC-067; DOC-013	1; HTML	Registry date and organisational announcement
Gerda Frans	ENGIE; RECOSI	Head of ESG; RECOSI Board Chair	Announcement of 03.12.2025	DOC-013	HTML	Two distinct functions
Taco Douma	RWE Generation; RECOSI	RWE representative; Vice-Chair	03.12.2025 announcement: remains in office	DOC-013	HTML	Original appointment date not established by this announcement

Person / organisation	Other party	Relationship type	Period	Document	Page	Established facts
Katie Warrick	Bettercoal / RECOSI	Executive head	2021 report; 2025 announcement; current structure	DOC-056; DOC-013; DOC-014	4; HTML	Executive work, separate from chairmanship
Joachim Löchte	Bettercoal	Chair	Founding announcement, 18.04.2012	DOC-066	1–2	Role at the announcement date
DONG Energy, EDF, Enel, E.ON, GDF SUEZ, RWE, Vattenfall	Bettercoal	Initiative founders	18.04.2012	DOC-066	1–2	Original list; historical names retained
Fortum	Bettercoal	First new member	18.04.2012	DOC-066	1–2	Separate from the seven founders
Uniper	Bettercoal	Uses assessments for supply verification and monitoring	2019	DOC-003	54	Company's stated use of results
Uniper	Uniper Supervisory Board	Regular information on responsible coal sourcing	Described in the September 2017–October 2018 report	DOC-088	24	Frequency stated; communication list and decisions require minutes
Uniper	Bettercoal secretariat	Seconded an employee for two years to monitor plans	Described in the September 2017–October 2018 report	DOC-088	24	Staff support; name and precise dates not stated
ENEL, ENGIE, ESB, Fortum, RWE, Uniper, Vattenfall	Bettercoal Russia Working Group	Members	Established December 2018; described February 2020	DOC-002	2	Working-group membership
Russia Working Group	TDI Sustainability	Commissioned the study	February 2020 report; September 2019 visit	DOC-002	2–3	Study and sources; payer of the individual invoice not disclosed
SLR Consulting / James McNally, Yelena Borovikova	KRU	Conducted the assessment	November 2015; May 2017	DOC-043	5	Team membership and site visits

Person / organisation	Other party	Relationship type	Period	Document	Page	Established facts
Paul Mitchell, Julija Menise, Tatiana Vasenko	SDS-Ugol	Conducted the assessment	November 2017	DOC-020	5	Site-visit team
Paul Mitchell, Julija Menise, Tatiana Vasenko	SUEK	Conducted the assessment	May 2018	DOC-044	6	Site-visit team
The Dragonfly Initiative / Julija Menise, Tatiana Vasenko, Vladimir Simov, Peter Whitbread-Abrutat	Taldinskaya Mining Company	Conducted the assessment	November 2018	DOC-045	5	Site-visit team
KRU	Krasnobrodsky, Bachatsky, Taldinsky	Producer's sites; visited by assessors	2015 and 2017	DOC-043	5	Assessment itinerary, not a supply contract
SUEK	Taldinskaya-Zapadnaya-1 and -2, Yalovsky, Ruban, Zarechny	Producer's sites; visited by assessors	May 2018	DOC-044	5–6	Assessment itinerary
SDS-Ugol	Salek / Vostochny, Chernigovets, Listvyazhnaya	Group sites; visited by assessors	November 2017	DOC-020	4–5	Assessment itinerary
SDS-Ugol	LLC Shakhta Listvyazhnaya	Subsidiary	2021 circumstances; statement of 25.03.2025	DOC-021	HTML	Corporate affiliation stated by the prosecution
JSC Chernigovets	Yuzhnaya mine	Operation / branch	Ruling of 12.02.2018	DOC-039	Ruling text	Legal entity in the case about a specific working
Taldinskaya Mining Company	Taldinskaya-Yuzhnaya and Kyrgayskaya	Assessment sites	November 2018	DOC-045	5	Both mines visited
Bettercoal	KRU, SUEK, SDS-Ugol, Taldinskaya Mining Company	Published improvement-plan statuses	July 2022	DOC-010; DOC-050; DOC-011; DOC-051	CIP profiles	Statuses of group items

Person / organisation	Other party	Relationship type	Period	Document	Page	Established facts
Bettercoal	KTK; TalTEK	Early-stage participation	January 2020; February 2021	DOC-046; DOC-047	Produce r profiles	Not a completed site assessment
Bettercoal	Russian producers	Suspended engagement	Statement of 28.04.2022; publication of 03.05.2022	DOC-079	HTML	Programme and plan verification
RECOSI members	RECOSI	Annual membership fees	2025: 14 members	DOC-083	12	General funding source; member-specific amounts not disclosed
Bettercoal producers	RECOSI → third-party assessors	Pay for assessments; RECOSI pays assessors	Rule disclosed in the 2025 report	DOC-083	12	Current-period payment arrangements
Uniper	'Russia' origin category	Purchases under direct contracts	2019–2021; Latvia included in 2019–2020	DOC-003; DOC-004; DOC-005	54; 74; 46, 93	Aggregate by origin; specific seller not named

Table 9. Commercial relationships requiring documentation

These rows are not included as established supplies in the main diagram.

Buyer	Potential seller / subject	Available information	Period, volume, site	Source	Documents requested
Uniper Global Commodities SE	KRU	Volza entry, commodity code 2701	Dates, volume and mine absent from the public entry	DOC-077	Contract, invoice, bill of lading, mine of origin and matching legal entity
Uniper Global Commodities SE	SDS-Ugol	Volza entry, commodity code 2701	Dates, volume and mine absent from the public entry	DOC-077	Purchasing history by legal entity and consignment
Fortum / Uniper	‘This supplier’ in the answer about Listvyazhnaya	Answer to question 39: no purchases in recent years	Years and legal entity not separately named	DOC-052, p. 16	Clarify the answer’s period and subject; do not substitute a specific mine for the group
Additional buyers and suppliers	Require an inventory	Materials not included in the verified set	—	—	Provide primary documents; match seller, buyer, dates and origin

Table 10. Correspondence with article V11

Baseline version: web-v11/article-ru.json. The checksum is preserved in article-baseline.json. Exact wording of each claim appears in the CLM cards and a separate CSV.

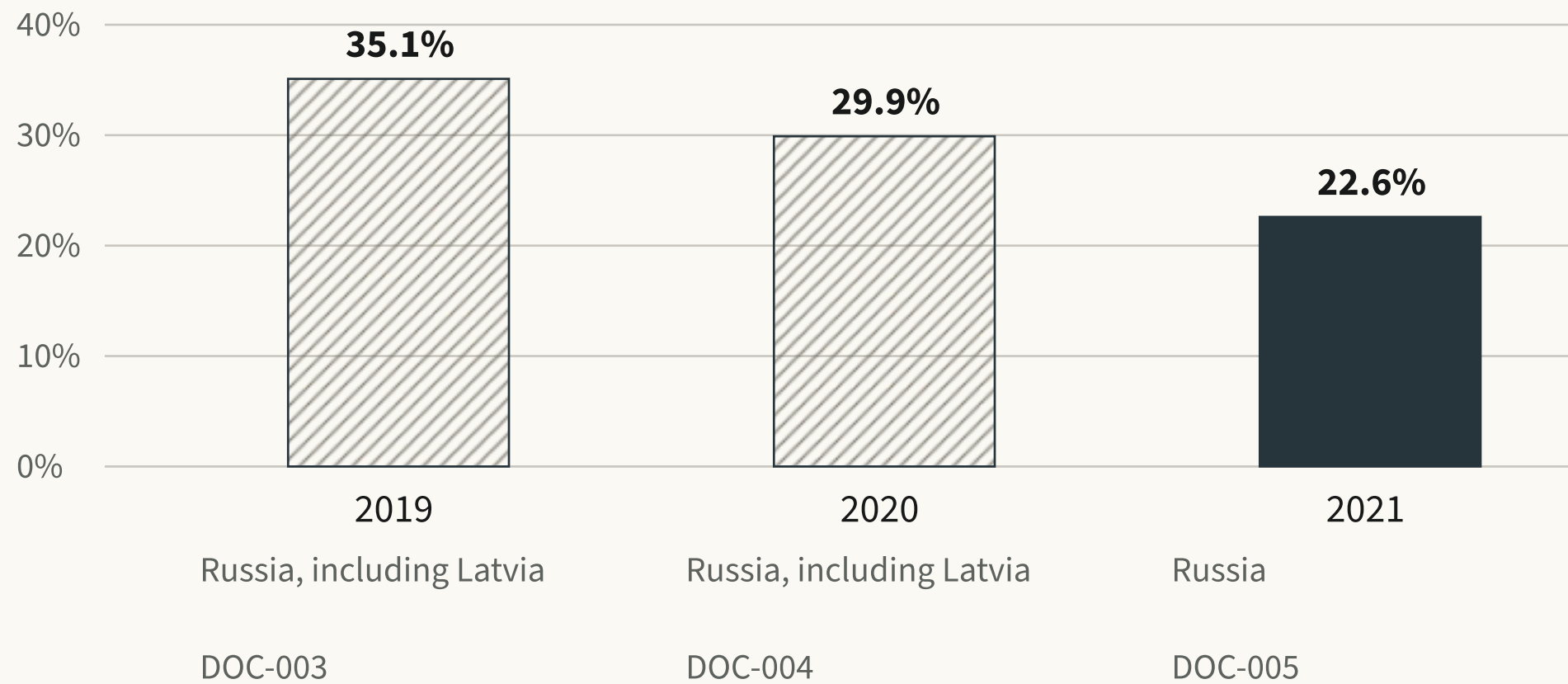
Article section	Chapter / cards	Sources and locations	Verification result
What the documents show (opening)	ch. 8; ch. 5; ch. 6; ch. 7; CLM-007; CLM-008; CLM-018; CLM-021; CLM-029; CLM-030	DOC-003: PDF 54, 63; DOC-020: PDF 4, 5; DOC-021: specified paragraphs / rows; DOC-089: PDF 34	The November 2017 itinerary and May 2018 plan are linked to the same mine; the judicial announcement describes inaction in July–November 2021. Uniper reported use of assessments and regular reporting.
Kiselyovsk: what Uniper saw (visit)	ch. 8; CLM-034; CLM-035	DOC-001: specified paragraphs / rows; DOC-080: specified paragraphs / rows	Uniper described a short visit to Kiselyovsk in September 2019 and mining close to homes. The engineer’s report establishes 461.98 m to the house inspected; this is not the author’s flat.

Article section	Chapter / cards	Sources and locations	Verification result
Bettercoal: buyers created their own assessment system (organization)	ch. 4; ch. 9; CLM-001; CLM-002; CLM-053; CLM-051; CLM-055	DOC-055: specified paragraphs / rows; DOC-066: PDF 1; DOC-069: PDF 10; DOC-088: PDF 24	Incorporation, seven original founders and voting rules in the 2023 edition are confirmed. The 2017/18 report discloses secretariat staff support and regular information for Uniper's Board.
Who pays for assessments, and what the accounts reveal (money)	ch. 4; CLM-045; CLM-046; CLM-047	DOC-070: PDF 4; DOC-071: PDF 4; DOC-072: PDF 4; DOC-073: PDF 4; DOC-074: PDF 4; DOC-075: PDF 4; DOC-056: PDF 22; DOC-083: PDF 12	Balance sheets contain balances at a date. The 2021 expenses total GBP 571,000, and the 2025 expenses GBP 845,890; categories differ. Individual payers' contributions require a breakdown.
What the Code promised — and how assessments were conducted (rules)	ch. 5; ch. 7; CLM-008; CLM-009; CLM-010; CLM-019; CLM-020; CLM-021	DOC-003: PDF 63; DOC-053: PDF 7; DOC-043: PDF 5; DOC-045: PDF 5; DOC-020: PDF 6, 10, 5	Code 1.1 was approved on 28.06.2017; KRU's early visits predate this. The letter became mandatory after the 2017 process revision. Compliance ratings and the immediate-action category are recorded separately.
KRU: the open-pit mines visited, more than 200 violations and a waste dispute (kru)	ch. 6; CLM-011; CLM-012; CLM-013; CLM-014	DOC-043: PDF 5; DOC-034: specified paragraphs / rows; DOC-035: specified paragraphs / rows; DOC-036: specified paragraphs / rows	The itinerary includes three named open-pit mines. The 2019 inspection identified more than 200 violations and suspended specific work. Waste dispute A27-110/2019 and the penalty overturned on 27.06.2019 are separate cases.
SUEK: hazardous coal dust, air pollution and noise (suek)	ch. 6; CLM-015; CLM-016; CLM-017	DOC-044: PDF 5, 6; DOC-037: specified paragraphs / rows; DOC-038: specified paragraphs / rows	Five sites visited in May 2018. Specific preparatory work and cargo transport prohibited at Ruban mine. Separate court incident concerning JSC SUEK-Kuzbass: NO ₂ ×2.7, noise +1.3 dBA; fine upheld.
SDS: a 'positive conclusion' and improvements still outstanding (sds-assessment)	ch. 6; ch. 5; ch. 7; CLM-018; CLM-019; CLM-020; CLM-021; CLM-022; CLM-054	DOC-020: PDF 4, 5, 6, 10; DOC-039: specified paragraphs / rows; DOC-048: specified paragraphs / rows	The corporate 'positive conclusion' (DOC-048) is compared with Misses for 2.2 and Partially Meets for 6.9 (DOC-020). The ratings concern the group; Yuzhnaya is within the overall scope, while Listvyazhnaya and Vostochny are named in the itinerary.
Listvyazhnaya: what the Bettercoal report said (assessment)	ch. 6; ch. 5; ch. 7; CLM-018; CLM-019; CLM-020; CLM-021; CLM-054	DOC-020: PDF 4, 5, 6, 10; DOC-048: specified paragraphs / rows	Listvyazhnaya is named as visited. The plan was agreed in May 2018. The two ratings concern the SDS group; the absence of Immediate Resolutions does not change their substance.
One mine, different documents (mine)	ch. 7; CLM-029; CLM-030; CLM-052	DOC-021: specified paragraphs / rows; DOC-089: PDF 34; DOC-084: specified paragraphs / rows; DOC-085: specified paragraphs / rows	The Emergencies Ministry records the disaster on 25.11.2021 and 51 deaths, including five rescuers. The prosecution reports the judgment against executives; the 2026 decisions cite a separate criminal case concerning Mikon III.
What Bettercoal did after the disaster (response)	ch. 7; CLM-031; CLM-032; CLM-033	DOC-024: specified paragraphs / rows; DOC-056: PDF 20; DOC-079: specified paragraphs / rows	A statement was published after the disaster on 26.11.2021; the December webinar is described in the annual report. Overall engagement was suspended on 28.04.2022. Results of the promised review are requested.

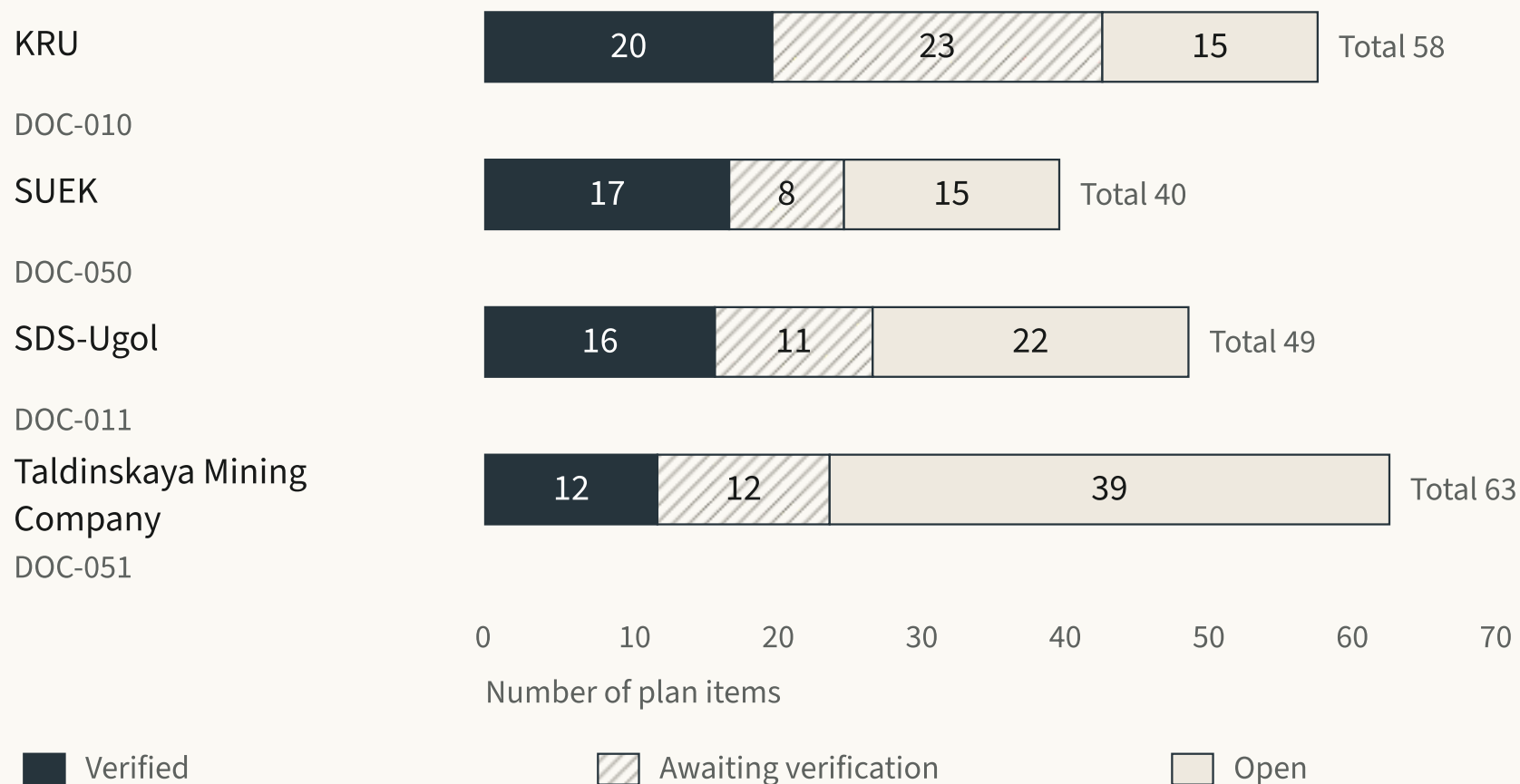
Article section	Chapter / cards	Sources and locations	Verification result
Listvyazhnaya and Bettercoal: events and dates (chronology)	ch. 6; ch. 7; CLM-018; CLM-021; CLM-029; CLM-030; CLM-031; CLM-032; CLM-033; CLM-052	DOC-020: PDF 4, 5; DOC-021: specified paragraphs / rows; DOC-089: PDF 34; DOC-024: specified paragraphs / rows; DOC-056: PDF 20; DOC-079: specified paragraphs / rows; DOC-084: specified paragraphs / rows; DOC-085: specified paragraphs / rows	Dates of the visit, plan, 2021 circumstances, disaster, response and subsequent judicial publications are distinguished.
Taldinskaya Mining Company: two mines and a development-work suspension (tmc)	ch. 6; CLM-023; CLM-024	DOC-045: PDF 5; DOC-040: specified paragraphs / rows	Two mines visited in November 2018; plan agreed in September 2019. Court suspension on 02.11.2020 concerns conveyor-roadway development for seven days.
KTK and TalTEK: early-stage participation and work suspensions (candidates)	ch. 6; CLM-025; CLM-026; CLM-027	DOC-046: specified paragraphs / rows; DOC-047: specified paragraphs / rows; DOC-041: specified paragraphs / rows; DOC-042: specified paragraphs / rows	KTK and TalTEK profiles describe an early stage. According to regulatory statements, work in danger zones was suspended for 60 and 90 days respectively.
What remained outstanding in four producers' plans (plans)	ch. 6; ch. 7; CLM-028; CLM-033	DOC-010: specified paragraphs / rows; DOC-050: specified paragraphs / rows; DOC-011: specified paragraphs / rows; DOC-051: specified paragraphs / rows; DOC-079: specified paragraphs / rows	Four July 2022 profiles: 210 items, 65 verified, 54 awaiting verification, 91 open. Statuses published after engagement was suspended; profile dates do not imply new site visits.
Code requirements and incidents in Russia (code-comparison)	ch. 5; ch. 6; CLM-009; CLM-012; CLM-013; CLM-016; CLM-017; CLM-019; CLM-020; CLM-022; CLM-024	DOC-053: PDF 7; DOC-034: specified paragraphs / rows; DOC-035: specified paragraphs / rows; DOC-037: specified paragraphs / rows; DOC-038: specified paragraphs / rows; DOC-020: PDF 6, 10; DOC-039: specified paragraphs / rows; DOC-040: specified paragraphs / rows	Table 3 compares specific Code 1.1 topics with incidents at operations. The version is not applied retrospectively to KRU visits. Allocation of group findings to mines is requested.
Suspension of participation and residents' complaints (limits-and-complaints)	ch. 7; ch. 5; CLM-033; CLM-049; CLM-050	DOC-079: specified paragraphs / rows; DOC-063: PDF 3; DOC-059: specified paragraphs / rows; DOC-083: PDF 17	The Russian programme's suspension is dated April 2022. As at 28.10.2026, November 2021 events fall within five years. The 2025 report schedules completion of two processes, including Shubarkol, for 2026.
After the visit: purchases and the shareholder vote (trade)	ch. 8; CLM-037; CLM-038; CLM-039	DOC-003: PDF 54; DOC-004: PDF 74; DOC-005: PDF 46; DOC-006: PDF 41; DOC-081: PDF 1	Direct purchasing shares — 35.1%, 29.9%, 22.6%; the first two include Latvia. 94.48% concerns approval of the Supervisory Board's actions in 2020. Uniper reports the end of Russian purchases from August 2022.

Article section	Chapter / cards	Sources and locations	Verification result
Who supplied Uniper: Fortum's answer and the limits of a trade database (suppliers)	ch. 8; CLM-040	DOC-052: PDF 16	Fortum question No. 39 concerns Listvyazhnaya; the answer uses 'this supplier' and 'past years'. Comparison with the trade database requires dates, legal entities and consignment origins.
The warning about intimidation was in the report (warnings)	ch. 8; ch. 10; CLM-036; CLM-044	DOC-002: PDF 4, 7; DOC-008: PDF 5, 15	TDI relays FERN's report of intimidation; Ecodefense's report cites videos from Natalia's outlet. This establishes information provenance, while its receipt date by the delegation requires correspondence and appendices.
My story in reports published at the time (natalia-record)	ch. 10; CLM-041; CLM-042; CLM-043; CLM-044	DOC-026: specified paragraphs / rows; DOC-032: specified paragraphs / rows; DOC-028: specified paragraphs / rows; DOC-008: PDF 5, 15	CPJ describes the attack, citing publications and an interview with Natalia. Sibir.Realii relays her account of departure. Each testimony's provenance is identified.
A threat to burn me alive — and a publication featuring fire (threat-image)	ch. 10; CLM-042	DOC-032: specified paragraphs / rows	A publication of 21.08.2020 featuring a fire montage is established. The origin of the private message announcing an 'execution' requires a separate original.
Frank Plümacher: Bettercoal Chair and Uniper Human Rights Officer (plumacher)	ch. 9; CLM-003; CLM-004; CLM-051; CLM-055; CLM-056	DOC-003: PDF 54; DOC-076: PDF 1; DOC-068: PDF 1; DOC-088: PDF 24; DOC-015: specified paragraphs / rows	Uniper dates election as Chair to April 2019; forms record appointment as director on 18.06.2019 and the end of the term on 27.11.2025. These are different events. His current Human Rights Officer role is confirmed by Uniper's page. Staff support and information for the Board are company actions.
Nadja Wendler: sustainability at Uniper and a seat on RECOSI's Board (wendler)	ch. 9; CLM-005; CLM-006; CLM-057	DOC-067: PDF 1; DOC-058: PDF 15; DOC-013: specified paragraphs / rows	The form records appointment as RECOSI director on 27.11.2025. The 03.12.2025 announcement names the SVP Sustainability role at Uniper. The EGPES 2024 programme identifies Wintershall Dea. Current responsibilities are not projected back onto Russian events in 2017–2022.
The questions I am taking to Uniper (questions)	Appendices B and C; personal testimony and prepared questions		The agreed questions and personal testimony are retained. At the article date, the meeting is only being requested; requests sent and answers received are added on the basis of supporting documents.

Figure 1. Shares of Uniper’s direct contractual purchases

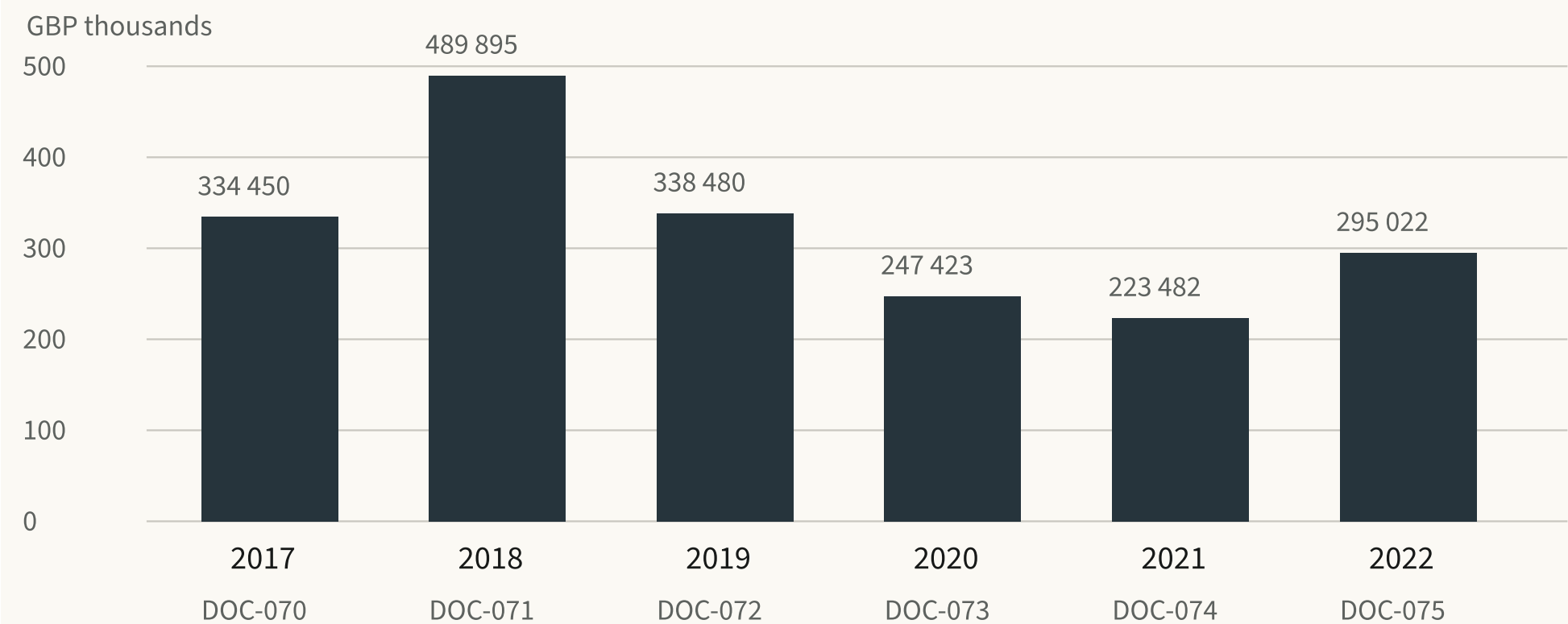


DOC-003, PDF 54; DOC-004, PDF 74; DOC-005, PDF 46, 93. Reported values without recalculation. 2019–2020 include Latvia; 2021 — Russia. Percentages, not tonnage or profits.

Figure 2. Status of four producers' improvement plans

DOC-010, DOC-050, DOC-011, DOC-051, CIP progress profiles, July 2022. Counts of group items are shown. Engagement suspended in April 2022. Items do not equal the number of legal violations.

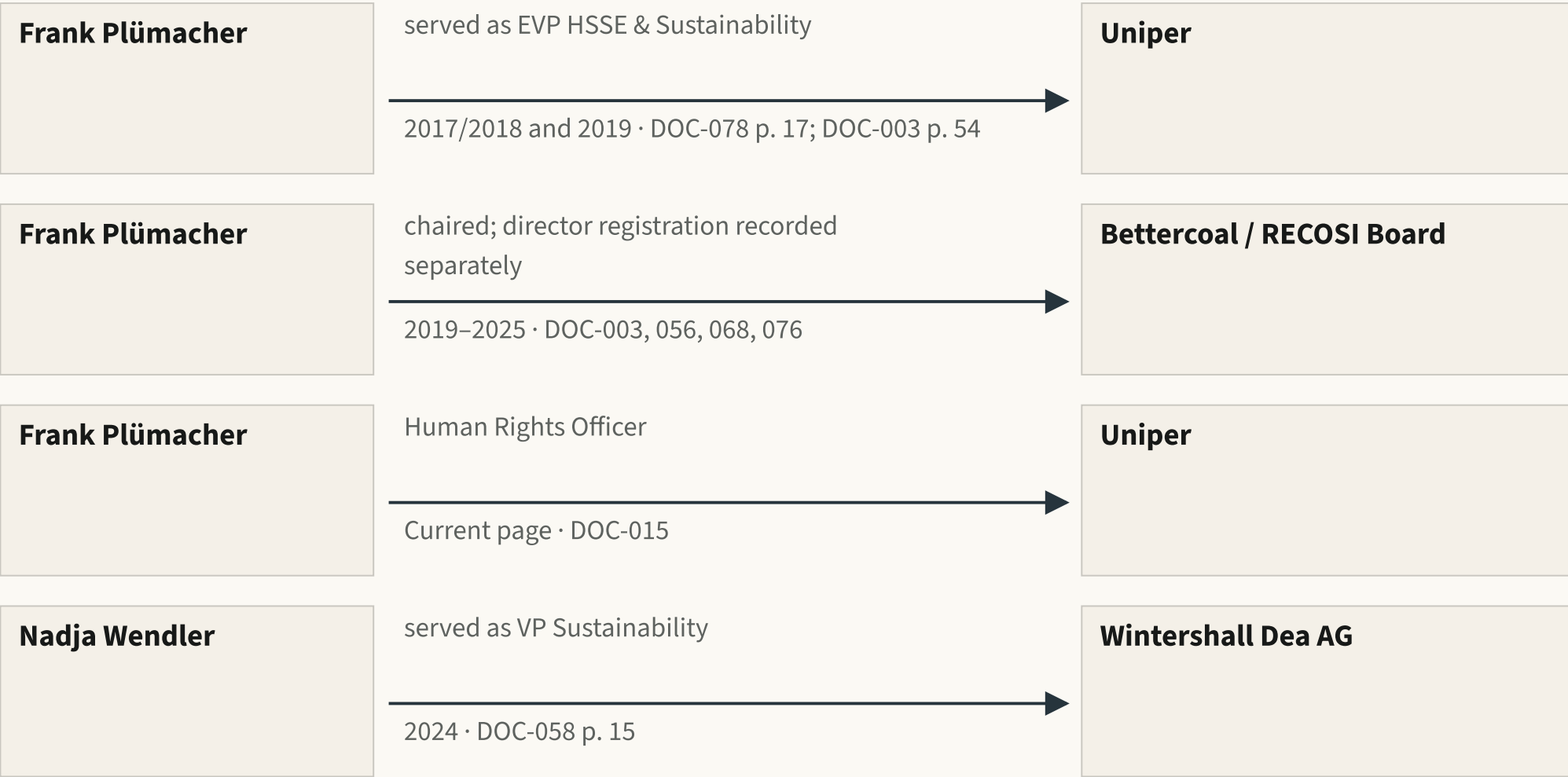
Figure 3. Bettercoal’s cash, 2017–2022



Values above bars are in GBP. Cash balance, not annual income.

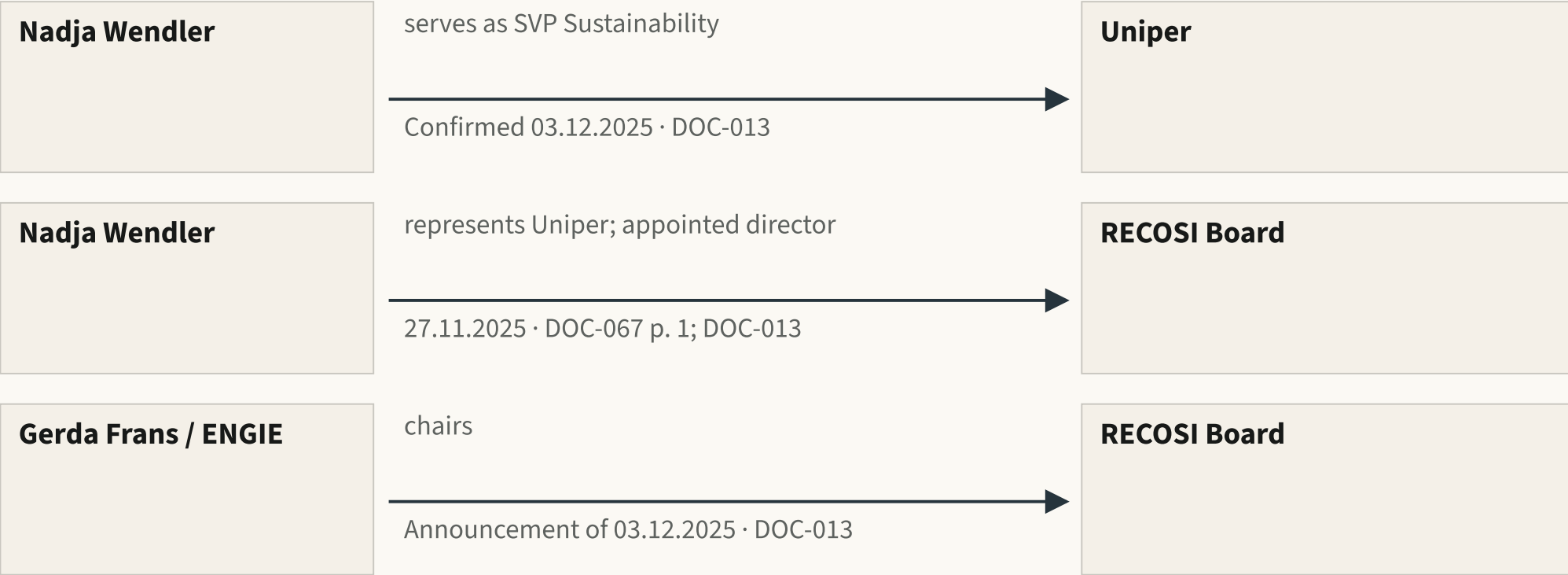
DOC-070–DOC-075, PDF 4 of each balance sheet. Cash at bank and in hand. Axis in GBP thousands; value labels in GBP. The same date each year — 31 December.

Figure 4. A. People, employers and the organisation’s Board — part 1



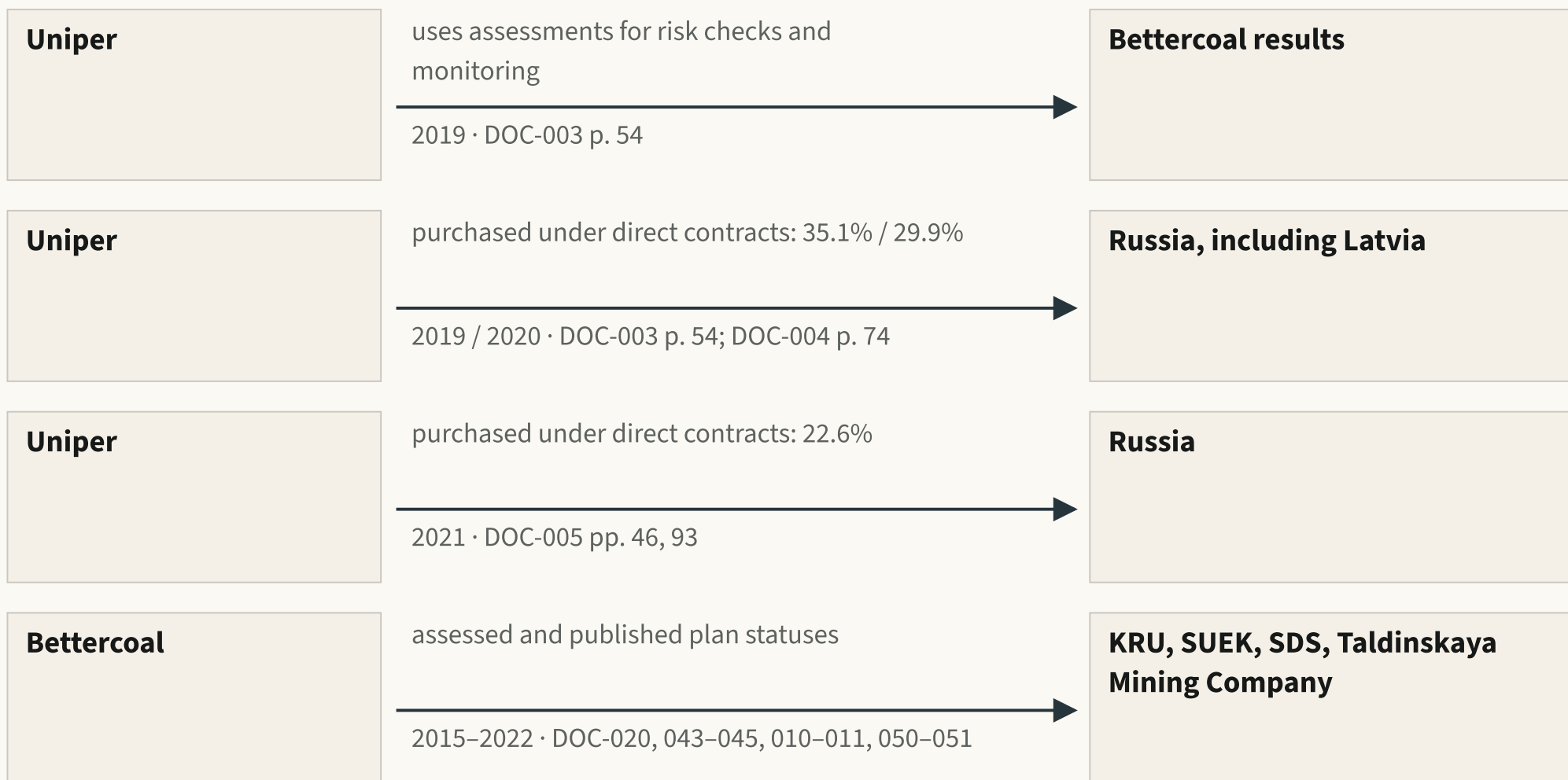
Lines denote positions and representation; start dates of individual employment roles are requested.

Figure 5. A. People, employers and the organisation’s Board — part 2



Lines denote positions and representation; start dates of individual employment roles are requested.

Figure 6. B. Confirmed information on purchases and assessments



Trade-database seller–buyer pairs are placed in the requests table. Mine-level origins require documents.

Figure 7. C. Producers and sites actually visited



Yuzhnaya mine — SDS overall scope, not the visit list. KTK and TalTEK — early-stage participation.

Figure 8. D. Key changes over time — part 1

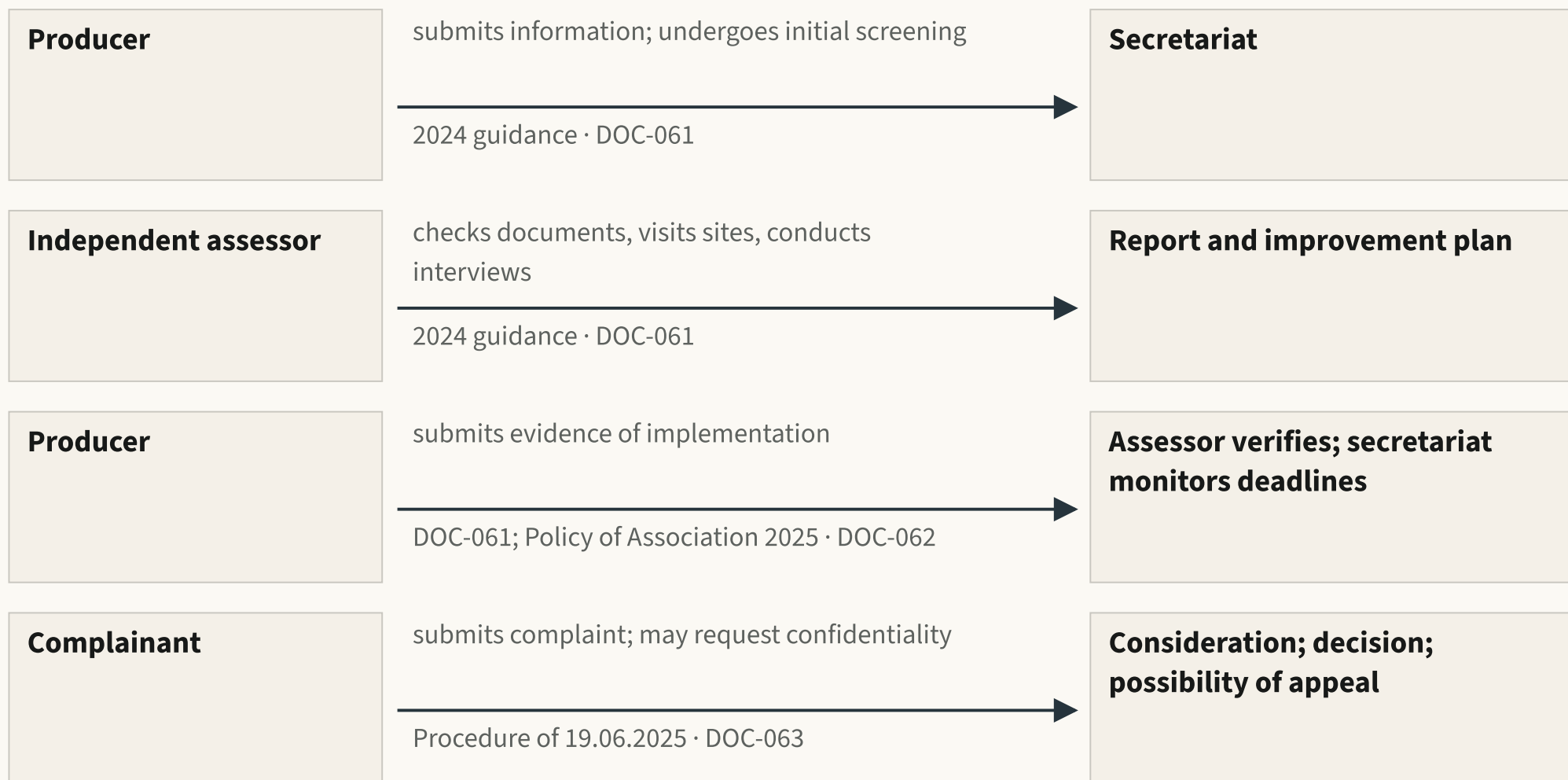
2012	Bettercoal Ltd; seven founders	incorporation and initiative established DOC-055; DOC-066
2015–2018	KRU; SDS; SUEK; Taldinskaya Mining Company	site assessments DOC-043; DOC-020; DOC-044; DOC-045
2019	Bettercoal Board; Kiselyovsk	Plümacher's chairmanship; separately — visit Uniper DOC-003 p. 54; DOC-001
2021	Bettercoal; Russian plans	remote monitoring; after the disaster — response DOC-056 pp. 3, 20; DOC-024

This is a chronological sequence. Personal involvement in specific decisions is checked against minutes.

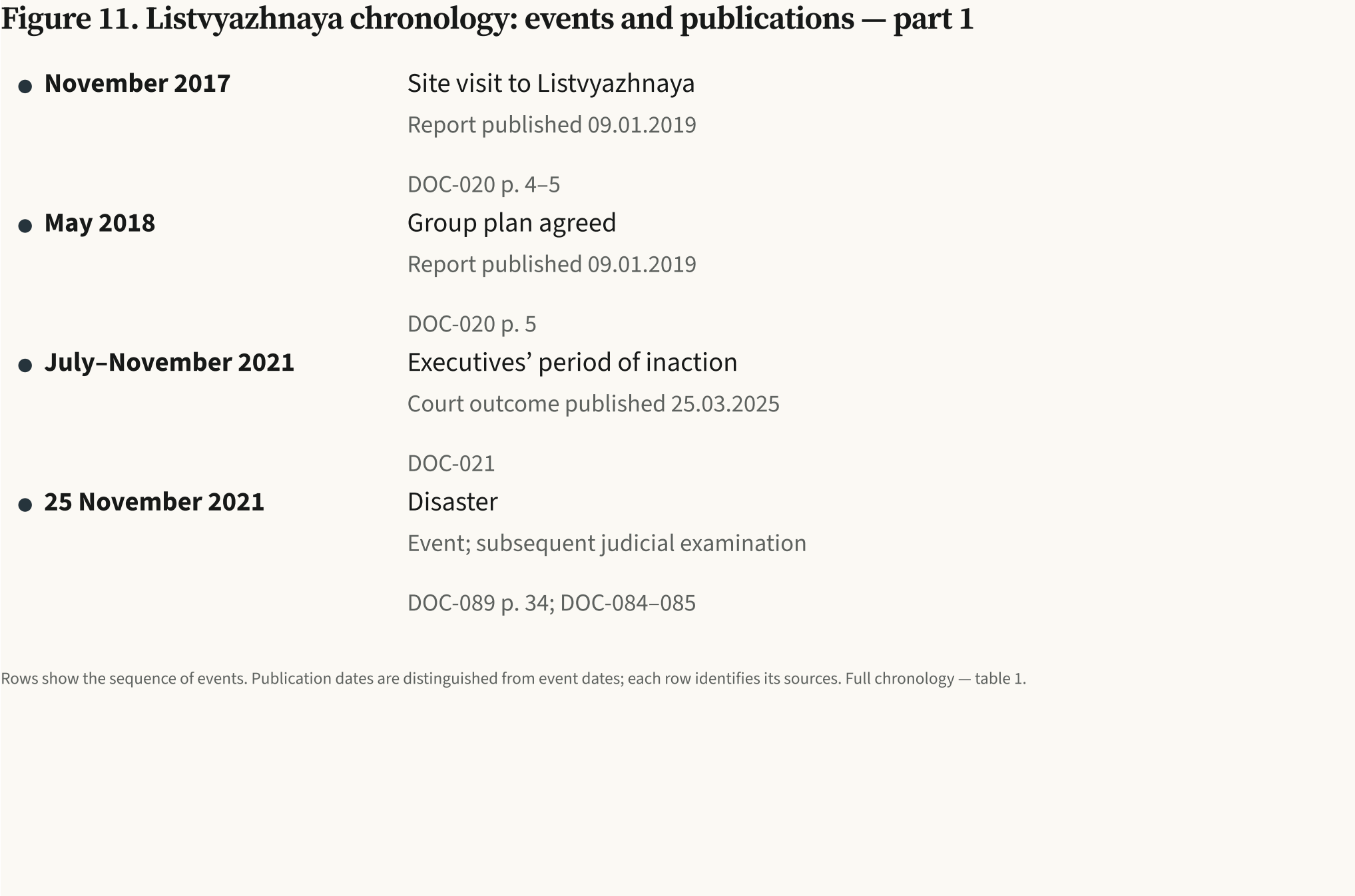
Figure 9. D. Key changes over time — part 2

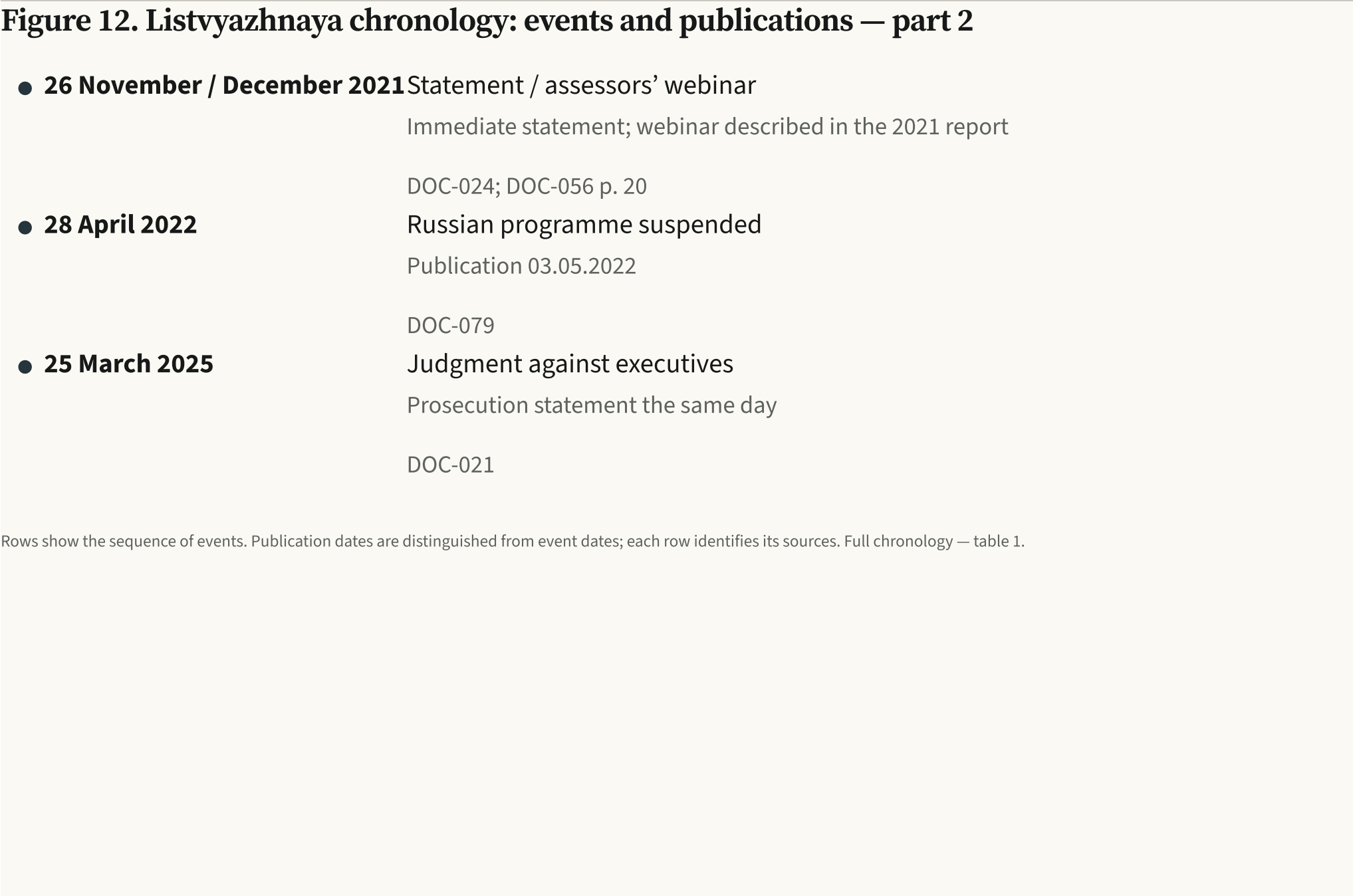
2022	Bettercoal / Uniper — separate decisions	April: programme suspended; August: purchases ended DOC-079; DOC-006 p. 41
2023 / 2025	RECOSI; Wendler's appointment	name change; later — Board membership change DOC-055; DOC-067; DOC-068

This is a chronological sequence. Personal involvement in specific decisions is checked against minutes.

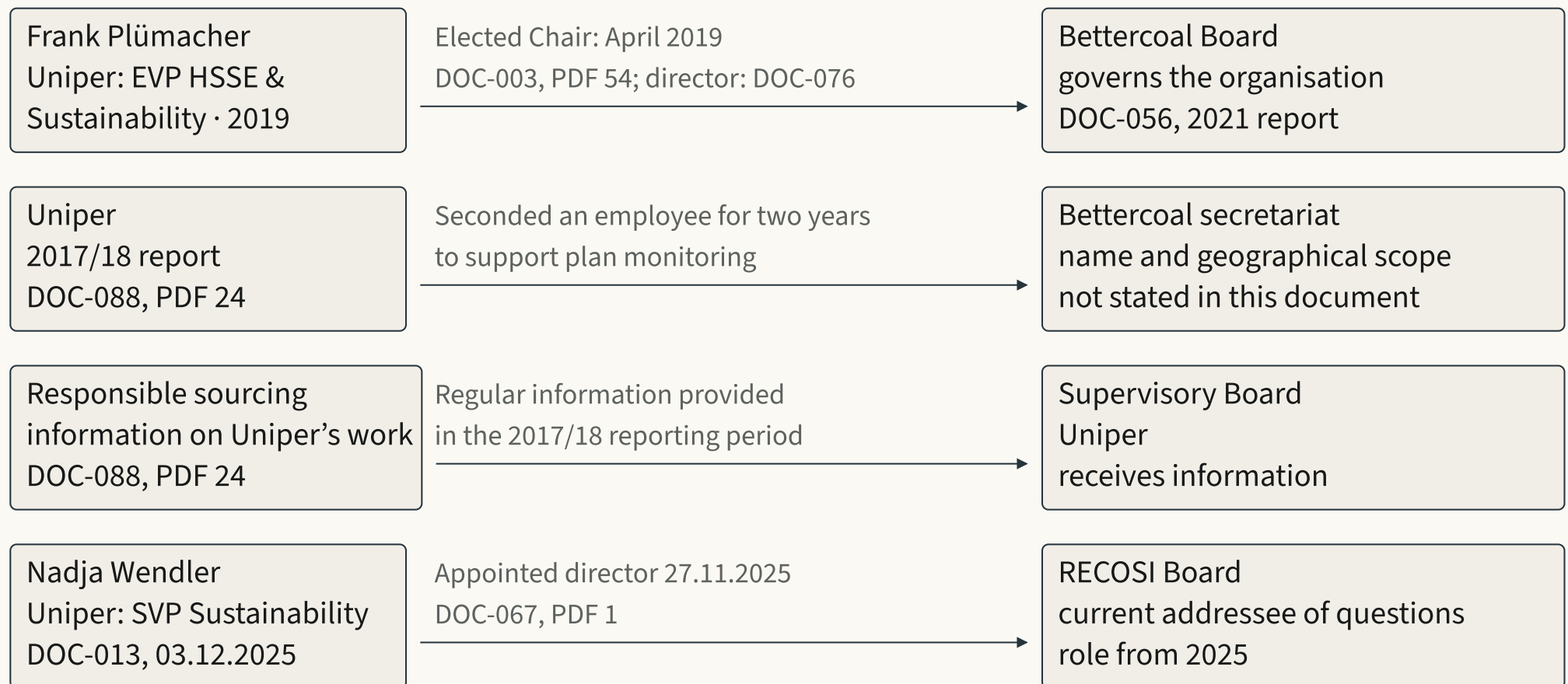
Figure 10. E. Assessment and complaints procedure under current rules

The diagram describes the 2024–2025 versions. Historical assessments are examined under the rules then in force.

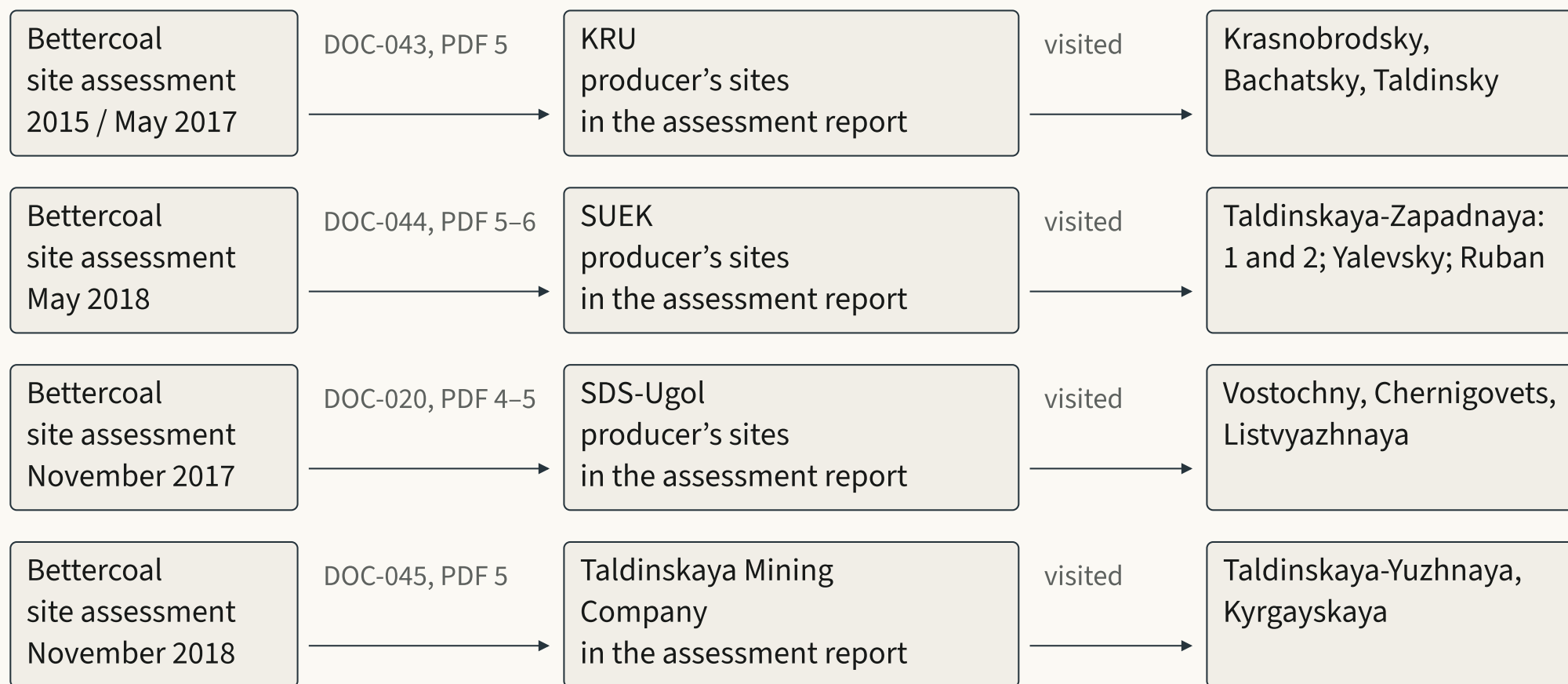




Rows show the sequence of events. Publication dates are distinguished from event dates; each row identifies its sources. Full chronology — table 1.

Figure 13. Overview, part 1. People, Uniper and Bettercoal / RECOSI bodies

Each line represents the named relationship in the stated period. The Board governs the organisation; the secretariat supports plan monitoring. Continued in the next figure: the Bettercoal programme, producers and sites. Commercial purchases are not shown here.

Figure 14. Overview, part 2. Programme, producers and sites visited

Lines: Bettercoal assessed the producer; assessors visited the specified sites. SUEK's itinerary also included Zarechny open-pit mine (DOC-044, PDF 5–6). Dates and documents relate to each row. Membership and assessment are separate from purchases.

12. Documents requested and status of submissions

Addressee	Documents	Purpose
RECOSI / Bettercoal	Full reports and site-specific plans for the four producers; historical Code editions and assessor contracts	To allocate findings to mines and establish precisely which rules applied
RECOSI / Bettercoal	Half-yearly reports, implementation evidence and assessors' decisions for 2017–2022; deadline-change log	To examine monitoring between site visits
RECOSI / Bettercoal	December 2021 webinar materials and results of the disaster review	To reconstruct the response after 25 November
Uniper	Itinerary, delegation list, organisers and accompanying persons; rules for conversations with residents; final visit memorandum	To reconstruct the Kiselyovsk visit and identify recipients of its findings
Uniper / RECOSI	Incoming Ecodefense materials, information on CPJ/RSF, complaint records and measures taken	To distinguish public availability from actual receipt
Uniper	Contracts and consignments for 2019–2022: seller, buyer, commodity, volume, date, mine of origin	To check the supply chain and Fortum's answer
Uniper / Frank Plümacher	Chair-election minutes, HRO appointment, Board materials on Russian risks	To establish precise responsibilities and personal involvement in decisions
Uniper / Nadja Wendler	Appointment date, responsibilities for historical risks, submission-handling procedure	For current consideration by a specific addressee
RECOSI	Historical Articles, appointment and voting rules; breakdown of fees, invoices and payment for Russian assessments	For a full picture of governance and funding
Regulators / courts / producers	Full inspection records, court-ordered work suspensions, implementation documents and Listvyazhnaya technical investigation	To check subsequent measures and causes against primary records
RECOSI	List of complaints concerning Russian events, anonymised decisions, application of the five-year limit	To examine the mechanism in practice and ongoing consequences

As at 28.10.2026, these are prepared requests. The research contains no evidence of dispatch or answers. These are to be added in a separate dated update.

13. Gaps and clarifications concerning the web article

The research is limited to preserved documents and verified passages. Some regulatory statements are available as press-service republications, while the full inspection record or court ruling is requested. For TDI, certain Uniper pages and the trade database, records of web reading have been preserved; the original PDF or complete export was not obtained in every case. The register separately identifies the storage method. Missing details are not filled with assumptions.

1. **New information:** RECOSI's 2025 report was published on 17 August 2026. Its results can be added to the article separately from the 2024 section. As at 31 December 2025, RECOSI's report lists 279 items: 66 closed, 30 awaiting verification and 183 open.
2. **Reference clarification:** in the preserved Russian Ecodefense report, video references appear on PDF pages 5 and 15, notes 17 and 75. Printed pagination and English-version pages differ.
3. **Clarification of the period in office:** Uniper's 2017 report was published in May 2018. It confirms Plümacher's stated position, but the precise appointment date must come from a personnel document.
4. **Profile discrepancies:** KRU's and SUEK's participation start dates in timelines differ from letter dates in assessment reports. The letters and an explanation of profile fields are needed.
5. **Additional court documents:** the decisions of 26 March and 2 April 2026 refer to the technical investigation and criminal cases. Dates are taken from within the documents, rather than aggregator headings.
6. **Uniper page:** the archived snapshot of 18 June 2020 is preserved. On 28 October 2026, the original cr.uniper.energy address was unavailable, while the archived copy opened. Verification details and translation appear in appendix A22.
7. **Additional supplier information:** included after checking primary documents and matching legal entities.

Article V11 and earlier PDFs are preserved. The list above records documentary additions and clarifications to the article.

14. Cards for material claims

CLM-001. The legal entity was incorporated on 28 February 2012 under No. 07968009; its name changed in November 2023.

Source and location: DOC-055, Company overview; Previous company names.

Document fields or entries: RESPONSIBLE COMMODITIES SOURCING INITIATIVE LTD. Company number 07968009. Incorporated on 28 February 2012. Previous company names: BETTERCOAL — 28 Feb 2012 – 22 Nov 2023.

Basis for the finding: The name, number and two dates are read from the corresponding fields of a single registry entry.

Verification outcome: Continuity of the organisation in the register.

Scope and further verification: The registered office does not establish the actual office location.

Comparison: Founding press release DOC-066.

CLM-002. The initiative's seven founders: DONG Energy, EDF, Enel, E.ON, GDF SUEZ, RWE, Vattenfall.

Source and location: DOC-066, PDF 1, paragraph after the opening statement.

Original excerpt: The initiative has been set up by founding members DONG Energy, EDF, Enel, E.ON, GDF SUEZ, RWE and Vattenfall, and aims to support on-the-ground changes to the benefit of workers, communities, businesses and the environment.

Basis for the finding: The sentence explicitly names seven founders; the next sentence identifies Fortum as the first new member.

Verification outcome: List at the announcement date, 18 April 2012.

Scope and further verification: Current names and membership do not replace the original list.

Comparison: DOC-055 and the current structure DOC-014.

CLM-003. Frank Plümacher was elected Bettercoal Chair in April 2019.

Source and location: DOC-003, PDF 54 / printed 52.

Original excerpt: In April 2019, Frank Plümacher, our Executive Vice President for HSSE & Sustainability, was elected to serve as Chairman of Bettercoal's Board of Directors for the next three years.

Basis for the finding: The sentence establishes the name, Uniper position, election as Chair, month and stated term. The registry appointment as director is examined separately in CLM-004.

Verification outcome: Uniper's announcement of the election and three-year term.

Scope and further verification: Registry appointment as director is a separate event.

Comparison: DOC-076, AP01, 18 June 2019.

CLM-004. Plümacher's appointment as director is dated 18 June 2019; his term ended on 27 November 2025.

Source and location: DOC-076, PDF 1, form AP01; visual reading of the scan.

Document fields or entries: Appointment of Director. Company Name: BETTERCOAL. Company Number: 07968009. Date of Appointment: 18/06/2019. Name: MR FRANK PLUMACHER.

Basis for the finding: The heading and form fields identifying the appointment, person and date are transcribed.

Source and location: DOC-068, PDF 1, form TM01.

Document fields or entries: Termination of a Director Appointment. Company Name: RESPONSIBLE COMMODITIES SOURCING INITIATIVE LTD. Date of termination: 27/11/2025. Name: MR FRANK PLUMACHER.

Basis for the finding: The form records the end of the directorship of the same legal entity.

Verification outcome: Registry events.

Scope and further verification: The start date of the Chair's actual responsibilities requires minutes.

Comparison: DOC-003 and DOC-013.

CLM-005. Nadja Wendler was appointed a RECOSI director on 27 November 2025.

Source and location: DOC-067, PDF 1, form AP01.

Document fields or entries: Appointment of Director. Company Name: Responsible Commodities Sourcing Initiative Ltd. Date of Appointment: 27/11/2025. Name: MS NADJA WENDLER.

Basis for the finding: The fields concern appointment as director, rather than the start of employment at Uniper. Personal details from the form are not included in the public copy.

Verification outcome: Appointment date.

Scope and further verification: The role is not projected back onto 2017–2022.

Comparison: Announcement of 3 December DOC-013.

CLM-006. EGPES 2024 identifies Wendler as Vice President Sustainability at Wintershall Dea.

Source and location: DOC-058, PDF 15 / printed 26–27, attribution beneath the statement.

Document fields or entries: Nadja Wendler / Vice President, Sustainability / Wintershall Dea AG

Basis for the finding: The attribution directly connects name, role and employer in the EGPES 2024 material.

Verification outcome: Position on the conference page.

Scope and further verification: The precise date of her move to Uniper requires a document.

Comparison: DOC-013 confirms Uniper by December 2025.

CLM-007. Uniper described using Bettercoal assessments for risk checks and supply monitoring.

Source and location: DOC-003, PDF 54 / printed 52.

Original excerpt: Bettercoal independently assesses the performance of coal mining operations against the ten principles of the Bettercoal Code. We use this information in our ESG due diligence process and in monitoring our supply chain.

Basis for the finding: ‘This information’ refers to the operation-assessment results in the preceding sentence. Both sentences are therefore included.

Verification outcome: Company’s stated use of the information.

Scope and further verification: A consignment-specific decision requires a separate document.

Comparison: Reporting frequency on PDF 63.

CLM-008. In its 2019 report, Uniper stated that Russian producers were reporting implementation of their improvement plans at least twice a year.

Source and location: DOC-003, PDF 63 / printed 61, continuation of the section on the Russia Working Group.

Original excerpt: These companies are currently reporting at least bi-annually on their continuous improvement plans. The RWG adopts a coordinated approach to monitoring suppliers' improvement plans, enhancing its members' country-context expertise, addressing risks arising from the country context, increasing the number of participating suppliers, and improving communications with key stakeholders.

Basis for the finding: This describes practice at the report date, rather than a universal rule for every year. Reference to the RWG establishes the Russian context.

Verification outcome: This describes Russian producers' reporting at the time in Uniper's report.

Scope and further verification: The actual sequence of communications requires a log and the reports themselves.

Comparison: SDS public report DOC-020, p. 7.

CLM-009. Code 1.1 was approved on 28 June 2017.

Source and location: DOC-053, PDF 7 / printed 6, section IV. Status and Effective date.

Original excerpt: This is Version 1.1 (2017) of the Bettercoal Code, which was approved by the Board of Directors on 28 June 2017 and is applicable from the date of publication.

Basis for the finding: The approval date and effective-date rule are stated separately. The reference has been corrected from PDF 3–5 to PDF 7.

Verification outcome: Temporal boundary of the edition.

Scope and further verification: KRU's 2015 and May 2017 visits are not assessed retrospectively against 1.1.

Comparison: DOC-043, p. 5.

CLM-010. The mandatory producer letter was introduced after the 2017 process revision.

Source and location: DOC-043, PDF 5, footnote to Step 1.

Original excerpt: Letter of Commitment only required after process review in 2017

Basis for the finding: The footnote explains why KRU's 2015 and May 2017 visits preceded the November 2017 letter.

Source and location: DOC-045, PDF 5, footnote to Step 1.

Original excerpt: Letter of Commitment only required after process review in 2017

Basis for the finding: The same footnote accompanies Taldinskaya Mining Company's historical sequence.

Verification outcome: The notes explain the sequence of early assessments.

Scope and further verification: A later letter date does not invalidate an earlier visit.

Comparison: Timeline discrepancies DOC-010 and DOC-050 are included in the request.

CLM-011. KRU: Krasnobrodsky was actually visited in 2015, and Bachatsky and Taldinsky in May 2017.

Source and location: DOC-043, PDF 5, Site-Assessment Scope.

Document fields or entries: Site-Assessment Scope: (November 2015) — Krasnobrodskiy Mine Site; (May 2017) — Batchatsky Mine; (May 2017) — Taldinsky Mine.

Basis for the finding: Specifically the site-visit entry is transcribed. The overall scope list of six open-pit mines appears above under a different heading.

Verification outcome: Assessment itinerary.

Scope and further verification: Six open-pit mines in the overall scope do not mean six visited.

Comparison: DOC-034 — subsequent 2019 inspection.

CLM-012. KRU's 2019 inspection identified more than 200 violations; specific work was suspended.

Source and location: DOC-034, statement of 14.05.2019, paragraphs on findings and suspensions.

English translation of the original excerpt: Following the inspection activities, regulatory officers drew up a report and issued an order to remedy more than 200 breaches of industrial safety requirements.

Original in Russian.

Basis for the finding: The count concerns the overall inspection of the operation.

Source and location: DOC-034, same statement, following paragraph.

English translation of the original excerpt: [...] operation and loading and unloading work at transfer point No. 2 of open-pit mine No. 5 of the Bachatsky Coal Mine branch were suspended for one month. Mining and drilling along the roof of the Moshchny seam at open-pit mine No. 7 of the Krasnobrodsky Coal Mine branch were suspended for three months.

Original in Russian.

Basis for the finding: The excerpt identifies the duration and limited subject of each suspension; it does not shut down every open-pit mine in its entirety.

Verification outcome: Regulator's press-service statement on the inspection of 70 sites.

Scope and further verification: The precise violation list and implementation require inspection records.

Comparison: Sites visited DOC-043; separate overturned penalty DOC-036.

CLM-013. Case A27-110/2019 concerns waste at the Vakhrushevsky field and payments for 2013–2015.

Source and location: DOC-035, ruling of 20.11.2019, account of the order.

English translation of the original excerpt: [...] submit to the Directorate an adjusted calculation of environmental impact charges for 2013–2015 concerning the placement of coal-beneficiation waste from OU KNS 4 of the Krasnobrodsky Coal Mine branch (Vakhrushevsky field).

Original in Russian.

Basis for the finding: The quotation identifies the calculation period, waste type, branch and field together.

Source and location: DOC-035, reasoning section.

English translation of the original excerpt: In dismissing the claims, the arbitrazh courts proceeded on the basis that the challenged orders complied with current legislation and that the rights and legitimate interests of JSC Coal Company Kuzbassrazrezugol had not been infringed.

Original in Russian.

Basis for the finding: Establishes the legal entity and the court's assessment of the challenged orders.

Verification outcome: Subject of the dispute, legal entity and outcomes at each judicial level.

Scope and further verification: This is a separate waste dispute, not a list of industrial violations.

Comparison: Code 1.1, section 9.2; DOC-053.

CLM-014. On 27 June 2019, KRU's fine concerning rules for operating gas-cleaning installations was overturned.

Source and location: DOC-036, operative part of the decision of 27.06.2019.

English translation of the original excerpt: The decision of the Russian Federation state inspector for environmental protection and natural resource use in Kemerovo Region, No. [redacted], dated 13 May 2019, issued against Joint Stock Company Coal Company Kuzbassrazrezugol in administrative-offence proceedings under part 3 of article 8.21 of the Russian Federation Code of Administrative Offences, shall be overturned. These proceedings shall be terminated under point 3 of part 1 of article 30.7 of the Russian Federation Code of Administrative Offences.

Original in Russian.

Basis for the finding: The date of the overturned decision, company concerned, article and both outcomes — overturning and termination — are given. The decision number is redacted in the published judgment.

Verification outcome: Penalty overturned, proceedings terminated.

Scope and further verification: Do not treat as a fine in force.

Comparison: Separate from the inspection DOC-034.

CLM-015. SUEK: assessors visited five sites in May 2018, including Ruban mine.

Source and location: DOC-044, PDF 5, Site-Assessment Scope.

Document fields or entries: Site-Assessment Scope (sites selected by the assessor following the methodology described in the Assessment Manual): Taldinskaya–Zapadnaya 1 underground mine; Taldinskaya–Zapadnaya 2 underground mine; Yalovskogo underground mine; Zarechny open pit; Rubana underground mine.

Basis for the finding: The list confirms five specific sites. The visit date is read from the next part of the report's table.

Source and location: DOC-044, PDF 6, Step 3.

Document fields or entries: Step 3: Site-Assessment — Completed in May 2018.

Basis for the finding: This entry supplements the site list on PDF 5 with the visit date.

Verification outcome: Assessment itinerary and team.

Scope and further verification: Group findings are not allocated to mines without the full report.

Comparison: DOC-037 — specific mine, 2020.

CLM-016. Development of assembly roadway 816 and cargo transport along roadway 818 were prohibited at Ruban mine.

Source and location: DOC-037, publication of 25.02.2020, paragraph on the official record.

English translation of the original excerpt: Inspectors of Rostekhnadzor's Siberian Directorate drew up a record temporarily prohibiting the development of assembly roadway No. 816 and cargo transport along haulage roadway No. 818.

Original in Russian.

Basis for the finding: The quotation identifies both prohibited activities. An assembly roadway is a preparatory mine working.

Verification outcome: Type of work and grounds for prohibition.

Scope and further verification: A statement that materials were referred to court is not the text of a court decision.

Comparison: DOC-044 — earlier site visit.

CLM-017. SUEK: the court upheld a fine for NO₂ exceeding the limit by a factor of 2.7 and maximum night-time noise by 1.3 dBA.

Source and location: DOC-038, decision of 17.06.2019, assessment of measurement results.

English translation of the original excerpt: [...] exceedance of the average daily maximum permissible concentration of nitrogen dioxide in ambient air in a residential area [...] by a factor of 2.7; exceedance of the permissible maximum night-time sound level in a residential house (bedroom) [...] by 1.3 dBA.

Original in Russian; address details omitted.

Basis for the finding: The substance, averaging period, noise-measurement location, time of day, figure and unit are preserved.

Source and location: DOC-038, operative part.

English translation of the original excerpt: The Leninsk-Kuznetsky City Court judge's decision of 15 April 2019 shall remain unchanged, and the appeal by counsel for JSC SUEK-Kuzbass shall be dismissed.

Original in Russian.

Basis for the finding: The appeal outcome concerns the city court's decision; the regional court ruled on the appeal.

Verification outcome: Residential-environment measurements and a 10,000-rouble fine.

Scope and further verification: Do not attribute the measurements specifically to Ruban mine.

Comparison: JSC SUEK-Kuzbass is named; DOC-044 covers the group.

CLM-018. SDS: Vostochny and Listvyazhnaya are named among sites visited.

Source and location: DOC-020, PDF 4, Site-Assessment Scope.

Document fields or entries: Site-Assessment Scope: SDS-Ugol corporate headquarters; Salek and Vostochnui Mines [...]; Chernigovets Mine [...]; Listvyazhnaya Mine [...].

Basis for the finding: Site addresses omitted. The list is taken from the visit entry, rather than the wider overall scope list.

Source and location: DOC-020, PDF 5, Step 3.

Document fields or entries: Step 3: Site-Assessment — Completed in November 2017.

Basis for the finding: Together, the two entries establish the sites and visit month.

Verification outcome: Connection of specific sites to the November 2017 visit.

Scope and further verification: Other sites in the overall scope were not automatically visited.

Comparison: Yuzhnaya within overall scope; DOC-039.

CLM-019. The SDS group was rated Misses for 2.2 and Partially Meets for 6.9.

Source and location: DOC-020, PDF 6, Overall performance; PDF 10, Annex 2.

Document fields or entries: Overall performance: Below are SDS Ugol's ratings against the Bettercoal Code. / Principle 2: 2.2 — Misses. / Principle 6: 6.9 — Partially Meets.

Basis for the finding: Columns were checked against the table image, rather than extracted-text order. Ratings concern the group; provision names are reporting violations/grievances and health/safety.

Verification outcome: Two group compliance ratings.

Scope and further verification: Do not allocate to an individual mine without a report identifying findings for each mine.

Comparison: Positive corporate description DOC-048.

CLM-020. The absence of Immediate Resolutions is recorded alongside adverse compliance ratings.

Source and location: DOC-020, PDF 6, Immediate Resolutions.

Original excerpt: There were no immediate resolutions found during the Assessment of Siberian Business Union Coal.

Basis for the finding: This is a separate results entry. The table on the same page contains Misses and Partially Meets; absence of the urgent category does not cancel them.

Verification outcome: Result for a separate urgency category.

Scope and further verification: Does not replace section 2.2 and 6.9 ratings.

Comparison: Ratings key on p. 10.

CLM-021. The SDS plan was agreed in May 2018.

Source and location: DOC-020, PDF 5, Step 4.

Document fields or entries: Step 4: Continuous Improvement Plan — Agreed in May 2018.

Basis for the finding: The row heading shows that the date concerns plan agreement, rather than the site visit.

Verification outcome: Date of group-plan agreement.

Scope and further verification: A Listvyazhnaya-specific item requires the full plan.

Comparison: Monitoring p. 7; profile DOC-011.

CLM-022. On 12 February 2018, Kemerovo District Court suspended development at Yuzhnaya for ten days.

Source and location: DOC-039, ruling of 12.02.2018, operative part.

English translation of the original excerpt: Find the legal entity JSC Chernigovets guilty [...] and impose a penalty suspending development of the Transport Working in the Vladimirovsky-II seam at the JSC Chernigovets branch — Yuzhnaya mine, at the address <...>, for 10 (ten) days.

Original in Russian.

Basis for the finding: ‘Transportnaya pech’ is the mine working’s name in the decision. The operation, seam, type of suspended work and duration are retained; the article uses the accessible explanation ‘development of a transport working’.

Verification outcome: Transport working in the Vladimirovsky-II seam; JSC Chernigovets.

Scope and further verification: Not the entire mine or an inclined shaft.

Comparison: SDS overall scope DOC-020.

CLM-023. Taldinskaya Mining Company: both mines visited in November 2018, plan agreed in September 2019.

Source and location: DOC-045, PDF 5, Site-Assessment Scope and Steps 3–4 entries.

Document fields or entries: Site-Assessment Scope: Taldinskaya–Yuzhnaya underground mine; Taldinskaya–Kyrgayskaya underground mine. Step 3: Site-Assessment — Completed in November 2018. Step 4: Continuous Improvement Plan — Agreed in September 2019.

Basis for the finding: Sites, visit and plan are read from different labelled entries in a single table.

Verification outcome: Assessment and plan dates.

Scope and further verification: Group findings do not replace a subsequent inspection of the working.

Comparison: DOC-040.

CLM-024. On 2 November 2020, conveyor-roadway development at Taldinskaya-Yuzhnaya was suspended for seven days.

Source and location: DOC-040, ruling of 02.11.2020, operative part.

English translation of the original excerpt: [...] impose an administrative suspension of conveyor roadway No. [redacted] development (from the flank), section No. [redacted], at: Russian Federation, <address>, JSC Shakhtoupravleniye Taldinskoye-Yuzhnoye, for 7 (seven) days.

Original in Russian.

Basis for the finding: Development of a specific working was suspended. Working and section numbers are redacted in the published decision; they are not reconstructed by guesswork.

Verification outcome: Specific work, duration and entity.

Scope and further verification: The company's statement of remediation is distinguished from implementation verification.

Comparison: DOC-045 — earlier assessment itinerary.

CLM-025. KTK and TalTEK were at an early stage of participation according to the published profiles.

Source and location: DOC-046, Timeline: Jan 2020.

Document fields or entries: Jan 2020. LETTER OF COMMITMENT & ASSESSMENT PLANNING. Signed letter of commitment to work towards meeting the expectations of the Bettercoal Code. Completed questionnaire to allow independent assessors to plan for on-site assessment.

Basis for the finding: The text describes preparation for KTK's visit, not its completion.

Source and location: DOC-047, Timeline: Feb 2021.

Document fields or entries: Feb 2021. LETTER OF COMMITMENT & ASSESSMENT PLANNING.

Basis for the finding: The same preparatory stage is recorded for Taltek Open Pit Mine Ltd.

Verification outcome: Participation start dates.

Scope and further verification: Do not describe as having completed a site assessment.

Comparison: Inspections DOC-041 and DOC-042.

CLM-026. KTK: the January–February 2021 inspection identified 44 violations and resulted in suspension of danger-zone work.

Source and location: DOC-041, statement of 24.02.2021, inspection findings.

English translation of the original excerpt: Inspection activities identified 44 breaches of mandatory industrial safety requirements.

Original in Russian.

Basis for the finding: The figure concerns the inspection of PJSC Kuzbasskaya Toplivnaya Company's Karakansky-Yuzhny open-pit mine.

Source and location: DOC-041, same statement, outcome of the referral to court.

English translation of the original excerpt: The court upheld Rostekhnadzor's Siberian Directorate's decision and ordered suspension of work in the danger zone at the mining section of the Karakansky-Yuzhny open-pit mine for 60 days.

Original in Russian.

Basis for the finding: The specific danger zone and suspension duration are stated.

Verification outcome: 60-day suspension, specific work.

Scope and further verification: Publication date does not replace the court ruling's date.

Comparison: DOC-046 — programme stage.

CLM-027. TalTEK: on 30 December 2021, the court suspended work in a danger zone for 90 days.

Source and location: DOC-042, Rostekhnadzor press-service statement on PravoTEK, 12.01.2022; final paragraph.

English translation of the original excerpt: Novokuznetsk District Court [...] on 30 December 2021 [...] suspended mining work in the danger zone at LLC Razrez TalTEK's hazardous industrial facility for 90 days.

Original in Russian.

Basis for the finding: The court, date, operation, work type and duration are preserved. The quotation was checked against the saved web-reading record; the full court decision remains requested.

Verification outcome: 23–28 December inspection and danger zone.

Scope and further verification: The full court decision remains requested.

Comparison: DOC-047 — early-stage participation.

CLM-028. The four July 2022 profiles contain 210 items: 65 verified, 54 awaiting verification, 91 open.

Source and location: DOC-010, CIP progress, July 2022.

Document fields or entries: Figures accurate as of: July 2022. Total assessment findings / changes to be implemented: 58. Changes implemented and independently verified: 20. Changes implemented and awaiting on-site verification: 23. Findings Open / changes still to be implemented: 15.

Basis for the finding: KRU: $20 + 23 + 15 = 58$. Combined totals of four profiles: 210 / 65 / 54 / 91.

Source and location: DOC-050, CIP progress, July 2022.

Document fields or entries: Figures accurate as of: July 2022. Total assessment findings / changes to be implemented: 40. Changes implemented and independently verified: 17. Changes implemented and awaiting on-site verification: 8. Findings Open / changes still to be implemented: 15.

Basis for the finding: SUEK: $17 + 8 + 15 = 40$. Combined totals of four profiles: 210 / 65 / 54 / 91.

Source and location: DOC-011, CIP progress, July 2022.

Document fields or entries: Figures accurate as of: July 2022. Total assessment findings / changes to be implemented: 49. Changes implemented and independently verified: 16. Changes implemented and awaiting on-site verification: 11. Findings Open / changes still to be implemented: 22.

Basis for the finding: SDS-Ugol: $16 + 11 + 22 = 49$. Combined totals of four profiles: 210 / 65 / 54 / 91.

Source and location: DOC-051, CIP progress, July 2022.

Document fields or entries: Figures accurate as of: July 2022. Total assessment findings / changes to be implemented: 63. Changes implemented and independently verified: 12. Changes implemented and awaiting on-site verification: 12. Findings Open / changes still to be implemented: 39.

Basis for the finding: Taldinskaya Mining Company: $12 + 12 + 39 = 63$. Combined totals of four profiles: 210 / 65 / 54 / 91.

Verification outcome: Sum of manually checked values; formula in the CSV.

Scope and further verification: Items do not equal violations; severity differs between companies.

Comparison: Summation of each status in data.mjs.

CLM-029. The judgment against SDS executives concerns inaction in July–November 2021.

Source and location: DOC-021, prosecution announcement of 25.03.2025, paragraph beginning ‘The court established’.

English translation of the original excerpt: The court established that from July to November 2021, Fedyaev, Alekseev and Yakutov, seeking benefits and advantages for themselves and other shareholders of JSC HC SDS-Ugol, deliberately failed to act and did not take the necessary steps to bring the mine operated by the subsidiary LLC Shakhta Listvyazhnaya into compliance with industrial safety requirements.

Original in Russian.

Basis for the finding: The sentence connects individuals, period, conduct and the mine’s legal entity. The source is the prosecution’s announcement of the court outcome.

Verification outcome: Period described by the prosecution with reference to the court.

Scope and further verification: Do not project these circumstances onto the 2017 assessment.

Comparison: DOC-020; DOC-084 and DOC-085 — subsequent judicial references.

CLM-030. The disaster occurred on 25 November 2021; 51 people died.

Source and location: DOC-089, Emergencies Ministry state report for 2021, PDF 34 / printed 34.

English translation of the original excerpt: On 25.11.2021, a methane explosion occurred in Belovo at LLC Shakhta Listvyazhnaya (JSC HC SDS-Ugol, coal mining). There were 157 casualties (including 51 mine rescuers), of whom 51 died (including 5 mine rescuers) and 106 were injured (including 46 mine rescuers).

Original in Russian.

Basis for the finding: The final state report separately identifies all casualties and deaths. The figure of 51 deaths, including five mine rescuers, is taken from this entry; the judgment announcement DOC-021 says only ‘several dozen’.

Verification outcome: Date and death toll.

Scope and further verification: Causes are analysed using separate technical and judicial materials.

Comparison: DOC-084; DOC-085.

CLM-031. Bettercoal issued a statement on 26 November 2021 and reported contact with SDS.

Source and location: DOC-024, publication of 26.11.2021.

Original excerpt: We are in communication with SDS-Ugol and have shared our sincerest condolences for the families, friends and colleagues of those who have lost their lives. [...] We will continue to engage with SDS-Ugol to understand the exact causes of the accident and the actions necessary to prevent such an accident in the future.

Basis for the finding: The first sentence reports contact already made; the second states an intention to continue work. It does not report the outcome of a future review.

Verification outcome: Public response and stated further engagement.

Scope and further verification: The review's results require its materials.

Comparison: December webinar DOC-056, p. 20.

CLM-032. A webinar of lead assessors on Russian plans took place in December 2021.

Source and location: DOC-056, PDF 20 / printed 38, Helping Bettercoal Members Monitor and Mitigate Risk.

Original excerpt: In December 2021, Bettercoal held a webinar with the independent Lead Assessors, to go through the status updates on the Continuous Improvement Plans for all Bettercoal Russian Producers.

Basis for the finding: The quotation identifies the webinar's month, participants, subject and Russian scope.

Verification outcome: Event and stated purpose of informing buyers.

Scope and further verification: Minutes and allocation of decisions to mines are requested.

Comparison: Response DOC-024; profile DOC-011.

CLM-033. Engagement with Russian producers was suspended from 28 April 2022.

Source and location: DOC-079, statement dated 28.04.2022; page published 03.05.2022.

Original excerpt: [...] we have therefore taken the decision to suspend Bettercoal's activities in Russia with immediate effect. [...] Bettercoal's third-party assessors will stop reviewing progress of Russian producers and Bettercoal will pause its engagement.

Basis for the finding: The statement date establishes the decision point; the text separately explains the consequences for plan verification.

Verification outcome: Overall programme measure.

Scope and further verification: The July profile date does not prove new verification after suspension.

Comparison: DOC-010, 011, 050, 051.

CLM-034. Uniper visited Kiselyovsk in September 2019 and described mining close to homes.

Source and location: DOC-001, archive of 18.06.2020, paragraph beginning ‘For example’.

Original excerpt: For example, while in Kuzbass in September 2019, as part of a Bettercoal mission, we managed to see the town of Kiselovsk, mentioned by the NGO Ecodefense as one of the most impacted by mining. Even if we stayed there for a very short time, it was sufficient to recognize how close to houses the mining operations are.

Basis for the finding: Two adjacent sentences confirm the timing, visit format, town and Uniper’s own observation.

Verification outcome: Company’s public account of the visit.

Scope and further verification: Delegation members and report recipients are requested.

Comparison: TDI DOC-002; measurement DOC-080.

CLM-035. The distance of 461.98 metres was measured from the nearest foot of the waste-rock dump to the house inspected.

Source and location: DOC-080, complete anonymised report page, 03.07.2019.

English translation of the original excerpt: Inspection on 26.04.2019 of the individual residential house [...] and the nearest waste-rock dump established: [...] Minimum distance to the footprint of the house inspected: 461.98 m.

Original in Russian; address and coordinates omitted.

Basis for the finding: The linked phrases establish the inspection objects and measurement unit. This is the house inspected, not the author’s flat. Complete public page — appendix A23.

Verification outcome: Subject of measurement and dates: inspection 26.04, report 03.07.2019.

Scope and further verification: This is not the distance to Natalia’s flat.

Comparison: Corporate description of the town DOC-001.

CLM-036. TDI relayed FERN's reports of intimidation of environmental activists.

Source and location: DOC-002, PDF 4, Emissions controls; reference ix leads to FERN on PDF 7.

Original excerpt: Finally, according to the rights group, FERN, intimidation of local environmental campaigners by coal companies is reportedly prevalent in Kuzbass.

Basis for the finding: The alleged actors, affected group, geography and attribution to FERN are retained. TDI relays a source's report; it does not acknowledge its own involvement in persecution.

Verification outcome: Provenance of the assertion and its regional scope.

Scope and further verification: Do not turn it into an admission of guilt by the commissioning party.

Comparison: Subsequent individual reports by CPJ and RSF.

CLM-037. Purchasing shares were 35.1%, 29.9%, 22.6%; the first two categories include Latvia.

Source and location: DOC-003, PDF 54 / printed 52, table and footnote 1.

Document fields or entries: Overall coal purchased via direct contract in 2019 by country of origin. Country of origin | % coal purchased. Russia¹ | 35.1. ¹ Includes coal from Latvia.

Basis for the finding: The heading defines the denominator; the footnote changes the geographical scope.

Source and location: DOC-004, PDF 74 / printed 73, table and footnote 1.

Document fields or entries: Coal purchased under direct contracts in 2020 by country of origin. Country of origin | % coal purchased. Russia¹ | 29.9. ¹ Includes coal from Latvia.

Basis for the finding: Only PDF 74 relates to this report.

Source and location: DOC-005, PDF 46 and 93 / printed 46 and 93.

Document fields or entries: Overall coal purchased via direct contract in 2021 by country of origin. Country of origin | % coal purchased. Russia | 22.6%.

Basis for the finding: The PDF 93 table repeats the indicator in the PDF 46 chart. Latvia is not named in this category's label.

Verification outcome: Values, denominator and change of scope.

Scope and further verification: Not tonnage, profits or a particular mine's share.

Comparison: Underlying data in purchases.csv.

CLM-038. Uniper reported that Russian purchases ended in August 2022.

Source and location: DOC-006, PDF 41 / printed 37.

Original excerpt: In this context, Uniper has not procured any more coal supplies from Russia since August 2022, which is also in line with Uniper's voluntary commitment in this regard from the first quarter of 2022.

Basis for the finding: This is the company's report that purchases actually ended, distinct from earlier statements of intent.

Verification outcome: Month of cessation according to the company's report.

Scope and further verification: Individual contracts require implementation documents.

Comparison: Earlier years' shares DOC-003–005.

CLM-039. 94.48% concerns approval of the Supervisory Board's actions in 2020.

Source and location: DOC-081, PDF 1, TOP 4; headings and results row.

Document fields or entries: Discharge of the members of the Supervisory Board for financial year 2020. TOP 4. Shares for which valid votes were cast: 322,950,342. Yes: 305,116,131; Quota: 94.48%. No: 17,834,211; Quota: 5.52%. Required majority reached.

Basis for the finding: The share is calculated from valid votes on item 4. The resolution concerned the Supervisory Board's actions, rather than a separate purchasing proposal.

Verification outcome: Subject, meeting date and result.

Scope and further verification: Not a vote specifically to continue Russian purchases.

Comparison: Counterproposal DOC-019.

CLM-040. Fortum's answer concerns the question about Listvyazhnaya and does not specify years.

Source and location: DOC-052, PDF 16, question 39 and first answer point.

Original excerpt: Did Fortum or Uniper get coal deliveries from this mine? [...] Neither Fortum or Uniper has been purchasing coal from this supplier in the past years.

Basis for the finding: 'This mine' in the question means Listvyazhnaya. The translation retains the indefinite period 'in recent years'. 'This supplier' cannot automatically be extended to all SDS group transactions.

Source and location: DOC-052, PDF 16, question 39, second answer point.

Original excerpt: Since the supplier in question is also a Bettercoal supplier, the Bettercoal secretariat is engaging with the company to understand the exact causes of the accident and the actions necessary to prevent such an accident in the future.

Basis for the finding: The substantive answer about the secretariat's stated engagement is retained.

Verification outcome: Answer wording and its temporal uncertainty.

Scope and further verification: Does not establish all purchases from the entire SDS group.

Comparison: Volza DOC-077 has a different scope and requires consignment documents.

CLM-041. On 3 March 2021, CPJ recorded Natalia's account of the 25 February attack.

Source and location: DOC-026, CPJ, 03.03.2021, paragraph about the evening of 25 February.

Original excerpt: In the evening of February 25, an unidentified hooded man in dark clothes attacked and threatened Zubkova, the chief editor and founder of the independent news website Novosti Kiselyovska, outside her home in southwestern Siberian city of Kiselyovsk, according to news reports and Zubkova, who spoke with CPJ in a phone interview.

Basis for the finding: The source explicitly identifies the information's provenance: publications and a telephone interview with Natalia. The quotation contains no precise private address.

Verification outcome: Dated interview and the organisation's public appeal.

Scope and further verification: Other retellings do not become new eyewitnesses.

Comparison: RSF DOC-027, publication of 10 March.

CLM-042. The image featuring fire was published by the Bez Tsenzury blog on 21 August 2020.

Source and location: DOC-032, heading, date and account byline; image within the publication.

English translation of document fields or entries: An 'attempt on Zubkova's life' is being prepared / 21.08.2020 / bezcenxury.

Original in Russian.

Basis for the finding: The date and account are read from the page heading. The fire montage is checked against the image itself in appendix A24; the text excerpt confirms publication details. The account holder's identity is not established.

Verification outcome: Provenance of the documentary illustration.

Scope and further verification: An account is not an identified individual; the publication is separate from the private threat.

Comparison: DOC-033 and DOC-026.

CLM-043. Natalia's departure from Russia was reported on 26 April 2021, roughly a week after she left.

Source and location: DOC-028, Sibir.Realii, 26.04.2021, article opening.

English translation of the original excerpt: [...] left Russia. Zubkova herself told Sibir.Realii's editorial team. The journalist declined to say which country she had moved to, but noted that she had done so a week earlier and was not yet planning to seek political asylum.

Original in Russian.

Basis for the finding: The departure information is explicitly attributed to Natalia. 'A week earlier' is counted from the 26 April publication; no precise calendar date is added.

Verification outcome: Testimony about the time of departure.

Scope and further verification: Do not infer a precise date; do not publish the current private address.

Comparison: DOC-029 — subsequent closure of the outlet.

CLM-044. Ecodefense's 2020 report cites Novosti Kiselyovska's video dated 8 June 2019.

Source and location: DOC-008, PDF 5, note 17; PDF 15, note 75.

English translation of the original excerpt: Kiselyovsk residents seek asylum from the Prime Minister of Canada. YouTube channel Novosti Kiselyovska, 8 June 2019, <https://www.youtube.com/watch?v=1Hru0InEvD4>.

Basis for the finding: The complete bibliographical entry confirms the outlet, video date and its use in the report. The same link appears in two notes.

Verification outcome: Use of the outlet's material in the report.

Scope and further verification: The report date does not prove that this precise text was provided before the visit.

Comparison: DOC-001 and request for pre-visit correspondence.

CLM-045. The 2017–2022 balance sheets contain cash balances and total assets less current liabilities.

Source and location: DOC-070, PDF 4, Balance sheet.

Document fields or entries: Balance sheet, 31 December 2017, £. Cash at bank and in hand: 334,450. Total assets less current liabilities: 231,696.

Basis for the finding: The heading, unit and two balance-sheet rows are transcribed; these are balances at a date, not annual revenue.

Source and location: DOC-071, PDF 4, Balance sheet.

Document fields or entries: Balance sheet, 31 December 2018, £. Cash at bank and in hand: 489,895. Total assets less current liabilities: 228,144.

Basis for the finding: The heading, unit and two balance-sheet rows are transcribed; these are balances at a date, not annual revenue.

Source and location: DOC-072, PDF 4, Balance sheet.

Document fields or entries: Balance sheet, 31 December 2019, £. Cash at bank and in hand: 338,480. Total assets less current liabilities: 310,078.

Basis for the finding: The heading, unit and two balance-sheet rows are transcribed; these are balances at a date, not annual revenue.

Source and location: DOC-073, PDF 4, Balance sheet.

Document fields or entries: Balance sheet, 31 December 2020, £. Cash at bank and in hand: 247,423. Total assets less current liabilities: 241,092.

Basis for the finding: The heading, unit and two balance-sheet rows are transcribed; these are balances at a date, not annual revenue.

Source and location: DOC-074, PDF 4, Balance sheet.

Document fields or entries: Balance sheet, 31 December 2021, £. Cash at bank and in hand: 223,482. Total assets less current liabilities: 172,103.

Basis for the finding: The heading, unit and two balance-sheet rows are transcribed; these are balances at a date, not annual revenue.

Source and location: DOC-075, PDF 4, Balance sheet.

Document fields or entries: Balance sheet, 31 December 2022, £. Cash at bank and in hand: 295,022. Total assets less current liabilities: 236,094.

Basis for the finding: The heading, unit and two balance-sheet rows are transcribed; these are balances at a date, not annual revenue.

Verification outcome: Comparable figure at 31 December each year, GBP.

Scope and further verification: A cash balance is not annual income.

Comparison: finance.csv; six original pages.

CLM-046. Expenditure under the 2021 report's four categories totals GBP 571,000.

Source and location: DOC-056, PDF 22 / printed 42–43, financial table.

Document fields or entries: Secretariat — £395,000; Assessments, CIP Monitoring, Online Platform, Bettercoal Standard — £143,000; Internal Governance — £19,000; Communications — £14,000.

Basis for the finding: Sum of four rows: $395,000 + 143,000 + 19,000 + 14,000 = \text{GBP } 571,000$. This is calculated from the published expenditure categories.

Verification outcome: $395000 + 143000 + 19000 + 14000$.

Scope and further verification: Categories differ from the 2025 structure.

Comparison: expenses.csv.

CLM-047. Expenditure under the five 2025 categories totals GBP 845,890.

Source and location: DOC-083, PDF 12, Finance.

Document fields or entries: RECOSI Costs — £572,950; Internal Governance — £25,279; Bettercoal Programme — £117,637; RECOSI Gas Programme — £80,422; Communications and Stakeholder Engagement — £49,602.

Basis for the finding: The five rows total GBP 845,890. Category names are retained; the gas programme is explicitly included.

Verification outcome: $572950 + 25279 + 117637 + 80422 + 49602$.

Scope and further verification: Includes the gas programme; this is not spending solely on Russian coal.

Comparison: expenses.csv; DOC-056 for the different 2021 structure.

CLM-048. As at 31 December 2025, RECOSI's report lists 279 items: 66 closed, 30 awaiting verification and 183 open.

Source and location: DOC-083, PDF 18, Continuous Improvement Plan progress, key and footnote *.

Document fields or entries: Bettercoal Producers in 2025: Six. Total findings 279. Findings closed — 66. Findings closed pending verification — 30. Findings open — 183. Data reflects information updated by December 31, 2025.

Basis for the finding: Categories were matched to figures using the original chart's colour key. Total: $66 + 30 + 183 = 279$.

Verification outcome: Statuses for six producers; visually checked key.

Scope and further verification: The sample differs from the four Russian profiles of 2022.

Comparison: Full-page image in the appendix. Report published on 17 August 2026 (DOC-087).

CLM-049. The 2025 complaints procedure contains a five-year criterion; November 2021 falls within it on 28 October 2026.

Source and location: DOC-063, PDF 3, Inadmissible Grievances.

Original excerpt: The following grievances will not be accepted as they are not within the scope of the Bettercoal Grievance Mechanism: [...] Events on which it is based occurred more than 5 years prior to the complaint.

Basis for the finding: A calendar calculation on 28 October 2026 gives a cut-off of 28 October 2021. November 2021 events still fall within that period.

Verification outcome: Criterion and calendar calculation of the 28.10.2021 cut-off.

Scope and further verification: The organisation decides whether a particular complaint is admissible.

Comparison: Request concerning ongoing consequences and historical events.

CLM-050. Shubarkol Komir's participation ended in 2019; the 2025 report again describes a site visit.

Source and location: DOC-059, publication of 24.06.2019, first paragraph.

Original excerpt: JSC Shubarkol Komir is no longer a Bettercoal Supplier as of today.

Basis for the finding: 'Today' refers to the publication date — 24 June 2019.

Source and location: DOC-083, PDF 17, Welcoming producers.

Original excerpt: Two site assessments took place in 2025: Shubarkol komir in Kazakhstan in Q4 of 2025; and Black Royalty Minerals Koornfontein in South Africa, also in Q4. Both processes are due for completion in 2026.

Basis for the finding: The report describes site visits already conducted and, separately, future completion of the processes. It does not claim completion had occurred.

Verification outcome: Two successive events concerning the named producer.

Scope and further verification: Do not confuse with the different legal entity Shubarkol Premium.

Comparison: The full path to restored status requires decisions.

CLM-051. Uniper seconded an employee to Bettercoal's secretariat for two years to monitor plans.

Source and location: DOC-088, PDF 24 / printed 24, right column, first paragraph.

Original excerpt: To support Bettercoal's Secretariat in the assessment program and processes, a Uniper employee has been seconded for a period of two years, supporting the monitoring of the Suppliers' Continuous Improvement Plans implementation.

Basis for the finding: The sentence establishes the employer, recipient of staff support, duration and task. It does not identify the plans' geographical scope.

Verification outcome: Staff support according to the 2017/18 report.

Scope and further verification: The document does not identify the employee or specific Russian tasks.

Comparison: DOC-003 — subsequent description of assessment use.

CLM-052. The 2026 court decisions cite the criminal case concerning the Mikon III system.

Source and location: DOC-084, decision of 02.04.2026, paragraphs about the final judgment of 28.05.2024.

English translation of the original excerpt: By a final judgment of Belovo City Court of Kemerovo Region dated 28.05.2024 in criminal case No. [redacted], the chief engineer of LLC Shakhta Listvyazhnaya, ФИО20, was found guilty of an offence under part 5 of article 274.1 of the Russian Criminal Code. During the trial in criminal case No. [redacted], the court established that ФИО20 had breached operating rules for the automated ASU AGK Mikon III control system, part of the Russian Federation's critical information infrastructure, causing harm to that infrastructure and grave consequences in the form of an accident at a hazardous industrial facility and major property damage to LLC Shakhta Listvyazhnaya, acting as part of an organised group and using his official position.

Original in Russian; the designation ФИО20 is retained as in the published decision.

Basis for the finding: The appellate decision cites a final criminal judgment and recounts the conduct and consequences established in that case. This is more than a mention of the system's name.

Source and location: DOC-085, decision of 26.03.2026, paragraph beginning 'During consideration of the criminal case'.

English translation of the original excerpt: During consideration of criminal case No. [redacted], the court established that ФИО22 had breached operating rules for the automated ASU AGK Mikon III control system, part of the Russian Federation's critical information infrastructure, causing harm to that infrastructure and grave consequences in the form of an accident at a hazardous industrial facility and major property damage to LLC Shakhta Listvyazhnaya, acting as part of an organised group and using his official position.

Original in Russian.

Basis for the finding: The second civil decision recounts the same criminal episode. This is another account of the court outcome, rather than a second independent technical study.

Verification outcome: Judicial account of a separate criminal episode.

Scope and further verification: The full judgment and technical report are needed to analyse all causes.

Comparison: Judgment against executives DOC-021 — a different subject.

CLM-053. Under RECOSI's 2023 Articles, members have one vote each; associate members and programme participants do not vote.

Source and location: DOC-069, PDF 10, provision 16.1; visual reading of the scan.

Original excerpt: Every Member shall have one vote on each resolution put to the vote at a general meeting, [...] Associates and Participants shall have no right to vote at any general meeting.

Basis for the finding: The excerpt confirms specifically the allocation of voting rights. Nomination of directors and appointment of the Chair are analysed separately in chapter 4 under provisions 21 and 23.

Verification outcome: The Articles distinguish voting members, associate members and programme participants.

Scope and further verification: Do not project this edition onto 2017–2022 decisions.

Comparison: DOC-056 — description of governance in 2021; DOC-014 — published Board membership.

CLM-054. SDS's corporate statement about a positive conclusion is compared with two adverse ratings in Bettercoal's public report.

Source and location: DOC-048, publication of 20.03.2018, first paragraph.

English translation of the original excerpt: As part of Bettercoal's assessment process, several JSC HC SDS-Ugol operations [...] namely JSC Salek (Vostochny open-pit mine), JSC Chernigovets and LLC Shakhta Listvyazhnaya, underwent audit procedures and received a positive conclusion of compliance with the Bettercoal Code.

Original in Russian.

Basis for the finding: The corporate announcement characterises the outcome as a positive conclusion of compliance.

Source and location: DOC-020, PDF 6, Overall performance; PDF 10, key.

Document fields or entries: SDS Ugol's ratings against the Bettercoal Code: 2.2 — Misses; 6.9 — Partially Meets.

Basis for the finding: The public report, published after the corporate announcement, discloses incomplete compliance with specific provisions. These are group ratings, not allocated to mines here.

Verification outcome: DOC-048 conveys the company's public wording; DOC-020 shows Misses for 2.2 and Partially Meets for 6.9. These results must be considered together.

Scope and further verification: Ratings concern the group. Identifying which findings relate to each mine requires the full report and plan.

Comparison: CLM-019 and CLM-020; appendix A3.

CLM-055. Uniper's Supervisory Board regularly received information on responsible coal sourcing, according to the Dutch Coal Covenant 2017/18 report.

Source and location: DOC-088, PDF 24 / printed 24, External Reporting.

Original excerpt: The company's Supervisory Board receives updates on Uniper's responsible coal procurement on a regular basis.

Basis for the finding: The recipient, topic and regularity of information are explicitly named. The contents of individual reports and information on specific violations must be established from those reports themselves.

Verification outcome: The document identifies the recipient and reporting regularity.

Scope and further verification: The materials provided and specific Board decisions require minutes and appendices.

Comparison: CLM-051: seconding an employee to the secretariat is a separate form of participation.

CLM-056. At the verification date, Uniper presents Plümacher as Executive Vice President and Human Rights Officer.

Source and location: DOC-015, Social responsibility page, name-and-role block; checked 28.10.2026.

Document fields or entries: Frank Plümacher / EVP Health, Safety, Security, Environment and Sustainability as well as Human Rights Officer (HRO) at Uniper

Basis for the finding: Name and role appear below the statement on the officer's duties. The block does not give the appointment start date.

Verification outcome: The company's official page names both positions beside his name.

Scope and further verification: The Human Rights Officer role's start date requires an appointment document.

Comparison: CLM-003 and CLM-004: historical Bettercoal appointments.

CLM-057. In December 2025, RECOSI described Wendler as Uniper's Senior Vice President Sustainability.

Source and location: DOC-013, RECOSI announcement of 03.12.2025, New Board Directors list.

Original excerpt: Nadja Wendler, Senior Vice President Sustainability, Uniper

Basis for the finding: The position appears in the announcement of new directors. The registry date of appointment to the Board is in CLM-005.

Verification outcome: Position and employer named in the new-director list.

Scope and further verification: The precise employment start date at Uniper requires a personnel document.

Comparison: CLM-005 — appointment as director on 27.11.2025; CLM-006 — position in 2024.

15. Sources and document register

A DOC number is retained on updating. Document date and acquisition date differ. SHA-256 verifies the integrity of a saved file, not its authenticity. The files below are in a separate sources archive; acquisition procedures are set out in appendix C. public-sources is a folder inside that archive. SHA-256 refers specifically to the supplied file; extracts and complete originals are identified separately. External links lead to sources; the cadastral link leads to appendix A23. DOC-086 is an alternative address for DOC-021's announcement, not separate corroboration. Gaps in numbering preserve the original article's numbering after duplicates were removed.

DOC-001. Uniper. The dilemma of investing in social and environmental remediation activities

Date: May 2020. **Used:** Archive of 18.06.2020, paragraph beginning 'For example'; HTML; archived snapshot dated 18 June 2020, 23:01:43 UTC.

https://web.archive.org/web/20200618230143id_/https://cr.uniper.energy/the-dilemma-of-investing-in-social-and-environmental-remediation-activities/

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T08:20:34.891Z.

Reviewed: Passages identified in claim card CLM-034.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-001-original.html. Saved source HTML of the public page; bytes unchanged; external resources not included

SHA-256 of supplied file public-sources/DOC-001-original.html:
c6dff9ba29ebe4115d0f039b7ded8f93f421183df94369413a0c3d2b1f1ad54c

CLM-034

DOC-002. TDI Sustainability. Environmental and Social Issues and the Coal Industry in Kuzbass, Russian Federation, and Focal Areas for Future Action

Date: February 2020. **Used:** PDF 4, Emissions controls; reference ix leads to FERN on PDF 7; PDF 2–3: visit; PDF 6–7: recommendations and sources.

https://www.uniper.energy/sites/default/files/2022-03/Bettercoal-in-Kuzbass_Public-Report.pdf

Acquisition: Textual web extraction. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim card CLM-036.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-002-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-002-extract.html:
a415f970fca7a7f29215a26462d4226edbb36ae0648f248455797c94b2e50abd

[CLM-036](#)

DOC-003. Uniper. Sustainability Report 2019

Date: Report for 2019; published in 2020. **Used:** PDF 54 / printed 52; PDF 63 / printed 61, continuation of the Russia Working Group section; PDF 54 / printed 52, table and footnote 1; printed p. 52 / PDF 54: purchases and Plümacher; printed pp. 60–61 / PDF 62–63: Russia; printed p. 76 / PDF 78: cr.uniper.energy.

https://www.uniper.energy/sites/default/files/2022-03/uniper_sustainability_report_2019_en.pdf

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-003, CLM-007, CLM-008, CLM-037.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-003.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-003.pdf:
d86923110278966f08438e93710bc2b4041ea971cb0ea4d1be054c554e348519

[CLM-003](#) · [CLM-007](#) · [CLM-008](#) · [CLM-037](#)

DOC-004. Uniper. Sustainability Report 2020

Date: Report for 2020. **Used:** PDF 74 / printed 73, table and footnote 1; printed p. 73 / PDF 74: 29.9%; printed p. 83 / PDF 84: conferences.

https://www.responsibilityreports.com/HostedData/ResponsibilityReportArchive/u/uniper-se_2020.pdf

Acquisition: Saved PDF. **Recorded preservation:** 2026-10-28T08:27:16.827Z.

Reviewed: Passages identified in claim card CLM-037.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-004.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-004.pdf:
5449dbae25505b3cd999bf2fd70368ba01e0feec88ecd8e100763e8c2263b1aa

[CLM-037](#)

DOC-005. Uniper. Sustainability Report 2021

Date: Report for 2021; published in 2022. **Used:** PDF 46 and 93 / printed 46 and 93; printed and PDF page numbers: 46, 77, 93.

https://www.responsibilityreports.com/HostedData/ResponsibilityReportArchive/u/uniper-se_2021.pdf

Acquisition: Saved PDF. **Recorded preservation:** 2026-10-28T08:27:20.880Z.

Reviewed: Passages identified in claim card CLM-037.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-005.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-005.pdf:
59c06c5e7b30f3b448ba465bebcdfaa9bcc570cb193a32d2a8182a4f368130

[CLM-037](#)

DOC-006. Uniper. Annual Report 2022

Date: Report for 2022; published in 2023. **Used:** PDF 41 / printed 37; printed p. 37 / PDF 41: August 2022; printed p. 118 / PDF 122: purchases within Bettercoal.

https://www.annualreports.com/HostedData/AnnualReportArchive/u/uniper-se_2022.pdf

Acquisition: Saved PDF. **Recorded preservation:** 2026-10-28T08:28:09.011Z.

Reviewed: Passages identified in claim cards CLM-038.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-006.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-006.pdf:
57fc5c9a8f7fcdf554eaf7d3626e7d0d703670861b5f566591bb00f5338

[CLM-038](#)

DOC-007. Council of the EU. EU adopts fifth round of sanctions against Russia over its military aggression against Ukraine

Date: 2022-04-08. **Used:** Ban on coal imports.

<https://www.consilium.europa.eu/en/press/press-releases/2022/04/08/eu-adopts-fifth-round-of-sanctions-against-russia-over-its-military-aggression-against-ukraine/>

Acquisition: Web reading / link from the baseline article. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The complete source file is not preserved in the working archive.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-008. Ecodefense! E. Solovyova, V. Slivyak. Race to the Bottom

Date: 2020. **Used:** PDF 5, note 17; PDF 15, note 75; PDF 5, 15; notes 17, 75.

<https://ecodefense.ru/wp-content/uploads/2020/10/race-to-the-bottom1.pdf>

Acquisition: Saved PDF. **Recorded preservation:** 2026-10-28T08:20:41.369Z.

Reviewed: Passages identified in claim cards CLM-044.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-008-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-008-extract.html:
150d455ff2c2823a67d635aafa933a7c7153501ca0ddeb2fcba5fe106bfb0890

[CLM-044](#)

DOC-009. Dachverband Kritische Aktionärinnen und Aktionäre. Klage gegen die Niederlande, Kohle-Lieferketten und Datteln 4: Unsere Fragen an den Vorstand von Uniper

Date: 2021-05-17. **Used:** Questions about coal imports from Russia.

<https://www.kritischeaktionae.de/uniper/klage-gegen-die-niederlande-kohle-lieferketten-und-datteln-4-unsere-fragen-an-den-vorstand-von-uniper/>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T08:23:56.410Z.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-010. Bettercoal. KRU — improvement-plan progress

Date: July 2022. **Used:** CIP progress, July 2022; 58 items: 20 verified, 23 awaiting verification, 15 open.

<https://www.bettercoal.org/kuzbassrazrezugol-coal-ojsc>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T08:28:05.435Z.

Reviewed: Passages identified in claim cards CLM-028.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-010-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-010-extract.html:
ab134c6b30023b80060479591e99e5c9c9671bd47838e9bc508648f63d15abe9

[CLM-028](#)

DOC-011. Bettercoal. Siberian Business Union Coal — CIP progress

Date: Data for July 2022. **Used:** CIP progress, July 2022; 49 items: 16 verified, 11 awaiting verification, 22 open.

<https://www.bettercoal.org/siberian-business-union-coal>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T08:28:05.437Z.

Reviewed: Passages identified in claim cards CLM-028.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-011-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-011-extract.html:
329459f794ec9d7240e34c394678a329b89c7422e15c838ee2b0453737b049a3

[CLM-028](#)

DOC-012. Bettercoal. Bettercoal Producers

Date: Checked on 28 October 2026; suspended since April 2022. **Used:** Suspension of engagement.

<https://www.bettercoal.org/bettercoal-producers>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T08:28:05.294Z.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-013. RECOSI. Changes to its Board of Directors

Date: 2025-12-03. **Used:** RECOSI announcement of 03.12.2025, New Board Directors list; leadership and organisational governance.

<https://www.recosi.com/news/recosi-announces-changes-to-its-board-of-directors>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T08:27:08.362Z.

Reviewed: Passages identified in claim cards CLM-057.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-013-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-013-extract.html:
5d498264c48ad090057ec4e2fde2b413ffff467fbc20fc76186e544995593cfd

[CLM-057](#)

DOC-014. RECOSI. Governance

Date: Composition as checked on 28 October 2026. **Used:** Board of Directors, technical committee and division of responsibilities.

<https://www.recosi.com/governance>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T08:23:54.414Z.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-015. Uniper. Social responsibility

Date: Checked on 28 October 2026. **Used:** Social responsibility page, name-and-role block; checked 28.10.2026; leadership and organisational governance.

<https://www.uniper.energy/sustainability/people-and-society/social-responsibility>

Acquisition: Web reading / link from the baseline article. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-056.

Preservation of the original: The complete source file is not preserved in the working archive.

Supplied file: public-sources/DOC-015-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-015-extract.html:
c675f043dedf3face8443d5e37b6cbec5d05fc7adc34a319b6f936cecca51080

[CLM-056](#)

DOC-016. Bettercoal. Governance

Date: Checked on 28 October 2026. **Used:** Leadership and organisational governance.

<https://www.bettercoal.org/governance>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T09:58:57.133Z.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-017. Bettercoal publishes its Annual Report 2018

Date: 2019-05-15. **Used:** Leadership and organisational governance.

<https://www.bettercoal.org/news/bettercoal-publishes-its-annual-report-2018>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T09:58:57.348Z.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-018. Bettercoal. Appointment of new Executive Director

Date: 2021-02-17. **Used:** Leadership and organisational governance.

<https://www.bettercoal.org/news/bettercoal-announces-appointment-of-new-executive-director-2>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T09:58:57.339Z.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-019. Uniper SE. Gegenanträge und Wahlvorschläge zur Hauptversammlung am 19. Mai 2021

Date: Counterproposal dated 4 May 2021. **Used:** PDF 3: the association of critical shareholders' proposal on agenda item 4.

https://www.uniper.energy/sites/default/files/2022-03/Gegenantraege_HV_2021.pdf

Acquisition: Web reading / link from the baseline article. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The complete source file is not preserved in the working archive.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-020. Bettercoal Assessment Public Report: Siberian Business Union Coal

Date: 2019-01-09. **Used:** PDF 4, Site-Assessment Scope; PDF 5, Step 3; PDF 6, Overall performance; PDF 10, Annex 2; PDF 6, Immediate Resolutions; PDF 5, Step 4; PDF 6, Overall performance; PDF 10, key; PDF 1: date; 4–5: sites and stages; 6: ratings and the Immediate Resolutions category; 10: ratings key.

<https://static1.squarespace.com/static/616d4f4a45c4cd5a0ed1a30d/t/62e194340e16f031d1ea08f5/1658950708972/Bettercoal-Public-Report-Siberian-Business-Union-Coal.pdf>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-018, CLM-019, CLM-020, CLM-021, CLM-054.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-020.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-020.pdf:
26e6ff8db1abd182ca173f55738fe4eb4bebdca4921818237f3cf9fd4918a6c3

[CLM-018](#) · [CLM-019](#) · [CLM-020](#) · [CLM-021](#) · [CLM-054](#)

DOC-021. Prosecutor General's Office: judgment against SDS-Ugol executives

Date: 2025-03-25. **Used:** Prosecution announcement of 25.03.2025, paragraph beginning 'The court established'; official announcement of the judgment.

<https://epp.genproc.gov.ru/ru/gprf/mass-media/news/main/e5606112/>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T12:11:10.387Z.

Reviewed: Passages identified in claim cards CLM-029.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-021-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-021-extract.html:
6e37b4925d939470a0acfafee23d52568c962ab490e34b1a204a84cca07066e

[CLM-029](#)

DOC-022. Interfax: judgment became final, no appeals lodged

Date: 2025-04-21. **Used:** Report citing the courts' press centre.

<https://www.interfax-russia.ru/siberia/news/osuzhdennye-po-delu-o-tragedii-na-shahte-listvyazhnaya-ne-stali-obzhalovat-prigovor>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T12:11:08.952Z.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-023. Kommersant: Failure to act results in sentences

Date: 2025-03-25. **Used:** Report on the trial; the defence's position.

<https://www.kommersant.ru/doc/7604419>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T12:11:09.379Z.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-024. Bettercoal: Accident at SDS-Ugol mine**Date:** 2021-11-26. **Used:** Publication of 26.11.2021; public response.<https://www.bettercoal.org/news/accident-at-sds-ugol-mine>**Acquisition:** Saved web page. **Recorded preservation:** 2026-10-28T08:28:05.740Z.**Reviewed:** Passages identified in claim cards CLM-031.**Preservation of the original:** The source file is preserved in the working archive; its checksum has been checked.**Supplied file:** public-sources/DOC-024-extract.html. Editorial text extract: not the complete original or a page imageSHA-256 of supplied file public-sources/DOC-024-extract.html:
0769f4195fccf059d5ec0a17bdac8e04f0462611cd7cc8ed97a860d96e19df06[CLM-031](#)**DOC-025. Sibir.Realii: mayor reports editor to prosecutors over interviews****Date:** 2019-08-26. **Used:** Letter and interview.<https://www.sibreal.org/a/30129098.html>**Acquisition:** Saved web page. **Recorded preservation:** 2026-10-28T12:11:09.370Z.**Reviewed:** Linked material; passages used are identified in the entry.**Preservation of the original:** The source file is preserved in the working archive; its checksum has been checked.**Supplied file:** File not included. No file is included in the public package; the source is available via the stated link when the website is accessible**DOC-026. CPJ: Russian journalist Natalia Zubkova in hiding following attack, death threats****Date:** 2021-03-03. **Used:** CPJ, 03.03.2021, paragraph about the evening of 25 February; telephone interview; information gathered by the article's author; requests for comment.<https://cpj.org/2021/03/russian-journalist-natalia-zubkova-in-hiding-following-attack-death-threats/>**Acquisition:** Saved web page. **Recorded preservation:** 2026-10-28T08:27:08.689Z.**Reviewed:** Passages identified in claim cards CLM-041.**Preservation of the original:** The source file is preserved in the working archive; its checksum has been checked.**Supplied file:** public-sources/DOC-026-extract.html. Editorial text extract: not the complete original or a page imageSHA-256 of supplied file public-sources/DOC-026-extract.html:
5b8ce1eb53e422b414d1f737f78ccdba1fc6f1540ab91a85e0c526d4af6908d9[CLM-041](#)

DOC-027. RSF: Journalist forced to flee Siberian hometown after years of harassment

Date: 2021-03-10. **Used:** Report on events and a statement in defence of the journalist.

<https://rsf.org/en/journalist-forced-flee-siberian-hometown-after-years-harassment>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T12:11:09.378Z.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-028. Sibir.Realii: journalist from Kiselyovsk leaves Russia

Date: 2021-04-26. **Used:** Sibir.Realii, 26.04.2021, article opening; direct interview.

<https://www.sibreal.org/a/31223397.html>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T12:11:09.370Z.

Reviewed: Passages identified in claim cards CLM-043.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-028-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-028-extract.html:
bc43565572a4a1dec9ce86490ba66b5ec8dd8685f60a8e9bf18f37f76ea51391

[CLM-043](#)

DOC-029. Radio Liberty: independent media outlet closed for editor's safety

Date: 2021-05-23. **Used:** Report on the closure.

<https://www.svoboda.org/a/31269102.html>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T12:11:08.931Z.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-030. Black Snow: press kit; Alina Simone

Date: 2024. **Used:** PDF 4: the director's account; the film has not been viewed.

<https://cineeco.pt/wp-content/uploads/2025/08/BLACK-SNOW-PRESS-KIT-2024.pdf>

Acquisition: Saved PDF. **Recorded preservation:** 2026-10-28T12:11:09.357Z.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-031. Uniper: Update on Uniper's Russian activities and way forward

Date: 2022-03-07. **Used:** Coal supply contracts and diversification of suppliers.

<https://www.uniper.energy/news/update-on-unipers-russian-activities-and-way-forward>

Acquisition: Web reading / link from the baseline article. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The complete source file is not preserved in the working archive.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-032. Bez Tsenzury. An 'attempt on Zubkova's life' is being prepared

Date: 21 August 2020. **Used:** Heading, date and account byline; image within the publication; original WordPress publication; account BEZCENXURY. The author's identity has not been established.

<https://bezcenxury.wordpress.com/2020/08/21/%d0%bd%d0%b0-%d0%b7%d1%83%d0%b1%d0%ba%d0%be%d0%b2%d1%83-%d0%b3%d0%be%d1%82%d0%be%d0%b2%d0%b8%d1%82%d1%81%d1%8f-%d0%bf%d0%be%d0%ba%d1%83%d1%88%d0%b5%d0%bd%d0%b8%d0%b5/>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T19:34:05.038Z.

Reviewed: Passages identified in claim cards CLM-042.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-032-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-032-extract.html:
0e1763fef2c7c0f94e7deaf0cb2e2df3b20d6c9be3af5e3144ae4213fbd03bc1

[CLM-042](#)

DOC-033. Natalya Zubkova. Two Realities

Date: Archive of material from 2019–2021. **Used:** Episode 08; archive A-15 — publication featuring the photomontage, A-67 — messages dated 17 August 2020.

<https://nataliazubkova.com/ru/work/propaganda-dezinformatsiya-rossiya-dve-realnosti/#threat-title>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T19:34:06.335Z.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-034. Rostekhnadzor: results of the KRU inspection, republished by Vesti Promyshlennoy Bezopasnosti

Date: 14 May 2019. **Used:** Statement of 14.05.2019, paragraphs on findings and suspensions; same statement, following paragraph; 70 hazardous industrial facilities; work restrictions at Bachatsky and Krasnobrodsky open-pit mines.

<https://vestipb.ru/indnews8492.html>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-012.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-034-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-034-extract.html:
1540149e6621d4241452fdef5768146fc794a8911a14b806b4a7b857e7ea6d7f

[CLM-012](#)

DOC-035. Arbitrazh Court of the West Siberian District. Case A27-110/2019

Date: 20 November 2019. **Used:** Ruling of 20.11.2019, account of the order; reasoning section; ruling Φ04-5045/2019; full text in the Kontur legal database.

<https://www.kontur-extern.ru/info/normativ/document/7/349076-postanovlenie-arbitrazhnogo-suda-zso-ot-20-11-2019-n-f04-5045-2019-po-delu-n-a27-110-2019>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-013.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-035-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-035-extract.html:
aaf53924248ea58d91435199597ef3b63021519a490c0b51fa35934e85b54a24

CLM-013

DOC-036. Belovo District Court. Case 12-71/2019

Date: 27 June 2019 — date in the text. **Used:** Operative part of the decision of 27.06.2019; decision of 13 May 2019 overturned; copy of the court decision on Sudact.

<https://sudact.ru/regular/doc/RHG0J3PWI1LQ/?page=8>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-014.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-036-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-036-extract.html:
54785f59058d505559c008006cf9e0df4cb0d26779ea2d7fb43d7b40bfd5c5b

CLM-014

DOC-037. Rostekhnadzor: violations at the A. D. Ruban mine

Date: 25 February 2020. **Used:** Publication of 25.02.2020, paragraph on the official record; Rostekhnadzor statement published by the Union of Industrial and Environmental Safety Specialists (SSPEB).

<https://www.uhsep.com/article/Technology/1625/>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-016.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-037-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-037-extract.html:
13d83ac728d5c46df1bf75a264111d1489761e308c24f347a4bb3ddc52258be6

[CLM-016](#)

DOC-038. Kemerovo Regional Court. Decision in case No. 12-328/2019

Date: 17 June 2019 — date within the decision. **Used:** Decision of 17.06.2019, assessment of measurement results; operative part; appeal against the Leninsk-Kuznetsky City Court decision of 15 April 2019. Copy on Sudact; the date in the aggregator's heading differs from the text.

<https://sudact.ru/regular/doc/v8NLvIFzOab/>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-017.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-038-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-038-extract.html:
f3ec4704fcf66cc92e6f227022b20dc532b6c0d6863942195e637c3de2908ed6

[CLM-017](#)

DOC-039. Kemerovo District Court. Ruling in case No. 5-50/2018

Date: 12 February 2018 — date within the ruling. **Used:** Ruling of 12.02.2018, operative part; JSC Chernigovets' Yuzhnaya mine: suspension of transport-working development. Copy on Sudact; the aggregator heading's date is incorrect.

<https://sudact.ru/regular/doc/LBJEAop5D7YP/>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-022.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-039-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-039-extract.html:
2d81dbdbfc9c36254ee9add11ac4b0452e6cf1ac8586a1e2ba2822e438591b06

[CLM-022](#)

DOC-040. Prokopyevsk District Court. Case 5-142/2020

Date: 2 November 2020 — date within the ruling. **Used:** Ruling of 02.11.2020, operative part; Taldinskaya-Yuzhnaya mine; the database heading gives 1 November.

<https://sudact.ru/regular/doc/b1riSoDaW0LJ/>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-024.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-040-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-040-extract.html:
cbbbf85a26f30c4f5163744436c1fe46f0b8571a698c451ac7dca14123be6c0f

[CLM-024](#)

DOC-041. Rostekhnadzor: Karakansky-Yuzhny open-pit mine

Date: 24 February 2021. **Used:** Statement of 24.02.2021, inspection findings; same statement, outcome of the court referral; Rostekhnadzor statement published by the Union of Industrial and Environmental Safety Specialists (SSPEB).

<https://www.uhsep.com/article/Technology/4911/>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-026.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-041-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-041-extract.html:
769f5f31fd06fb08f86e78206e05438fc77dfb9ca135bdd5c15fd699164bf9e2

[CLM-026](#)

DOC-042. Rostekhnadzor: work suspended at LLC Razrez TalTEK

Date: 12 January 2022. **Used:** Rostekhnadzor press-service statement on PravoTEK, 12.01.2022; final paragraph; regulator's press-service statement published by PravoTEK.

https://www.lawtek.ru/news/119276/sud_po_trebovaniyu_rostekhnadzora_pristanovil_vedeniye_gornyykh_rabot_v_opasnoy_zone_ooo_razrez_taltek

Acquisition: Web reading / link from the baseline article. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-027.

Preservation of the original: The complete source file is not preserved in the working archive.

Supplied file: public-sources/DOC-042-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-042-extract.html:
7c6d4dd324f47b3f768f690b586dc0db164fed742e910999664833952834c8e4

[CLM-027](#)

DOC-043. Bettercoal. Public Report: Kuzbassrazrezugol Coal Company OJSC

Date: Historical public report. **Used:** PDF 5, footnote to Step 1; PDF 5, Site-Assessment Scope; PDF 5: sites and dates; PDF 9–10: good practices and findings.

<https://www.bettercoal.org/s/Bettercoal-Public-Report-Kuzbassrazrezugol-Coal-Company-OJSC.pdf>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-010, CLM-011.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-043.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-043.pdf:
7618faccff0e270e62c02b2a0548e04bbd389e331b7f9f50ce767d908dd00d65

[CLM-010](#) · [CLM-011](#)

DOC-044. Bettercoal. Public Report: SUEK

Date: 31 January 2020. **Used:** PDF 5, Site-Assessment Scope; PDF 6, Step 3; PDF 5–6: scope and dates; PDF 9: areas for improvement.

https://www.bettercoal.org/s/Bettercoal-Public-Report-SUE_EN-z5np.pdf

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-015.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-044.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-044.pdf:
3d276b71eb9a66c46b26ba279a7c5d4b834674b8c93b1b9d3d6f36b75fe4644f

[CLM-015](#)

DOC-045. Bettercoal. Public Report: Taldinskaya Mining Company

Date: Historical public report. **Used:** PDF 5, footnote to Step 1; PDF 5, Site-Assessment Scope and Steps 3–4 entries; PDF 5–9: two mines, assessors, dates and findings.

https://www.bettercoal.org/s/Bettercoal-Public-Report_Taldinskaya-Mining-Company_English-xacf.pdf

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-010, CLM-023.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-045.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-045.pdf:
a0c6bdd81f124c6220347ba76723289483af53eb47de11f6beb49d3310ae9b23

[CLM-010](#) · [CLM-023](#)

DOC-046. Bettercoal. Kuzbasskaya Toplivnaya Company (KTK)

Date: Historical profile. **Used:** Timeline: Jan 2020; early-stage participation from January 2020.

<https://www.bettercoal.org/ktk>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-025.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-046-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-046-extract.html:
ee485fa9b6a57add5881841e5fbbe2bc22bfff36d82a62bc237d134291964ff17

[CLM-025](#)

DOC-047. Bettercoal. Taltek Group

Date: Historical profile. **Used:** Timeline: Feb 2021; early-stage participation from February 2021.

<https://www.bettercoal.org/taltek-open-pit-mine-ltd>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-025.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-047-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-047-extract.html:
6be45d5595afa4e585f9a4202057ecf6e019f249bba416906d621cdc60c47134

[CLM-025](#)

DOC-048. SDS-Ugol Holding Company becomes a partner of the international association Bettercoal

Date: 20 March 2018. **Used:** Publication of 20.03.2018, first paragraph; Rudmet, based on SDS-Ugol Holding Company material: the company's assessment of results and a list of required improvements.

<https://rudmet.net/news/8528/>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-054.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-048-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-048-extract.html:
94cc8e07ca5fa4a74f77e467f4fb77370431712d8911e685ecf919f9cdb4426e

[CLM-054](#)

DOC-050. Bettercoal. SUEK — improvement-plan progress

Date: July 2022. **Used:** CIP progress, July 2022; 40 items: 17 verified, 8 awaiting verification, 15 open.

<https://www.bettercoal.org/suek-jsc>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-028.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-050-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-050-extract.html:
d6f0c7e03143c346867969c597e8e6640821f6168ac65066916ced0c12f5cc6a

[CLM-028](#)

DOC-051. Bettercoal. Taldinskaya Mining Company — improvement-plan progress

Date: July 2022. **Used:** CIP progress, July 2022; 63 items: 12 verified, 12 awaiting verification, 39 open.

<https://www.bettercoal.org/taldinskaya-mining-company-llc>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-028.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-051-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-051-extract.html:
447157ffc8aa162f3eaac746e147976f0e554d47d491070b682b8090f4d545f2

[CLM-028](#)

DOC-052. Fortum. Answers to shareholders' advance questions

Date: 2022. **Used:** PDF 16, question 39 and first answer point; PDF 16, question 39, second answer point; PDF 16, question 39: answer on purchases following the question about Listvyazhnaya.

https://www.fortum.com/sites/default/files/investor-documents/vastauksia_osakkeenomistajien_ennakkokysymyksiin_fortumin_yhtiokokous_2022.pdf

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-040.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-052.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-052.pdf:
5869daa36125bb225986b1690679c02b990f89eabe26fd4bebbc80d31fe991a2

[CLM-040](#)

DOC-053. Bettercoal Code, version 1.1

Date: Approved 28 June 2017; July 2018 edition. **Used:** PDF 7 / printed 6, section IV. Status and Effective date; PDF 7: version history; PDF 12–32: requirements. Printed pagination is one lower than PDF pagination.

<https://www.bettercoal.org/s/resource-bettercoal-code-1.1-english>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-009.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-053.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-053.pdf:
80d7d26f2044492c905a8a871f619fa42dfc7e3ae7c2279f25d76c47bc3250e3

[CLM-009](#)

DOC-054. Bettercoal. Claims and Logo Use Guide

Date: 2023. **Used:** Rules on participation claims and logo use.

https://www.bettercoal.org/s/Bettercoal-Claims-and-Logo-Use-Guide_2023.pdf

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-054.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-054.pdf:
d1d160540d10810ad5c6cf208c8de1203ea0e8b3e6bb7cab800dd0cb3c8e3be1

DOC-055. Companies House. Responsible Commodities Sourcing Initiative Ltd

Date: Register checked on 28 October 2026. **Used:** Company overview; Previous company names; No. 07968009; incorporation and former name Bettercoal.

<https://find-and-update.company-information.service.gov.uk/company/07968009>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-001.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-055-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-055-extract.html:
1a769c5a37b8060801a91d0cbe425c2bc107bf485afb372415f7ca6282f8bee1

CLM-001

DOC-056. Bettercoal Annual Report 2021

Date: Published 28 July 2022. **Used:** PDF 20 / printed 38, Helping Bettercoal Members Monitor and Mitigate Risk; PDF 22 / printed 42–43, financial table; PDF 3–4: remote work; PDF 12–13: governance; PDF 20: Russia; PDF 22: finances. Two-page spreads, with two printed pages per PDF page.

<https://www.bettercoal.org/s/Bettercoal-Annual-Report-2021.pdf>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-032, CLM-046.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-056.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-056.pdf:
34890ee55d340862c5c89a37893661b4d4ed625bf748e4f5fd48f49f4b2d3f4c

[CLM-032](#) · [CLM-046](#)

DOC-058. EGYPTES 2024. Post Show Report

Date: 2024. **Used:** PDF 15 / printed 26–27, attribution beneath the statement; PDF 15 / printed pp. 26–27: Nadja Wendler, Wintershall Dea and her statement.

https://www.egyptes.com/media/v1oboqgi/psr_egyptes-2024_24-apr-2024.pdf

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-006.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-058.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-058.pdf:
54e40b3b2e0e54ac6c3a71ec98c8f0e063305e323ed3dc063e5cef992b4b3c77

[CLM-006](#)

DOC-059. Bettercoal. JSC Shubarkol Komir is no longer a Bettercoal Supplier

Date: 24 June 2019. **Used:** Publication of 24.06.2019, first paragraph; application of the Policy of Association because of an inability to implement the improvement plan.

<https://www.bettercoal.org/news/jsc-shubarkol-komir-is-no-longer-a-bettercoal-supplier>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-050.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-059-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-059-extract.html:
3f1d325c5d23b08e7c10faaed2432221f2d08b7d45666b43b7b1825f0499de76

CLM-050

DOC-060. RECOSI Annual Report 2024

Date: Report for 2024. **Used:** PDF 11: funding; PDF 14–16: programme results.

<https://static1.squarespace.com/static/65a1303a13bfdc12f7331a58/t/68de9211aecd0116c683a395/1759416849822/RECOSI%2BAnnual%2BReport%2B2024.pdf>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-060.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-060.pdf:
b33a228957495ed6f079b496d828317d57c739794e31c3b2046df4c12ecf01f8

DOC-061. Bettercoal Assessment Manual, version 2.0

Date: 1 January 2024. **Used:** PDF 11: payment; PDF 19–21: interviews; PDF 26–33: assessment, monitoring and confidentiality.

https://www.bettercoal.org/s/Bettercoal-Assessment-Manual_v2-wwdh.pdf

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-061.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-061.pdf:
6e2f55c6b63fbc1cf7f73aea51d37f4ed6356d1ec1f12da8822322e4c0c09e24

DOC-062. Bettercoal Policy of Association, version 2, revision 1

Date: 23 April 2025. **Used:** PDF 3–6: participation conditions, deadline extensions and disengagement.

<https://www.bettercoal.org/s/Bettercoal-Policy-of-Association-v2.pdf>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-062.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-062.pdf:
4104397b8c6546effc0d482171b88718c7034603d59994d88bea7cd06951e2ca

DOC-063. Bettercoal Grievance Mechanism, version 6

Date: 19 June 2025. **Used:** PDF 3, Inadmissible Grievances; PDF 3–6: admissibility, identity protection, deadlines and appeals.

<https://www.bettercoal.org/s/Bettercoal-Grievance-Mechanism-2025-msa8.pdf>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-049.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-063.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-063.pdf:
0a5dc56f341c3152b88f39d1c14cae4fb7175e6b668cc044b2ad0974d65da13

[CLM-049](#)

DOC-064. Bettercoal Lead Assessor Allocation Procedures, version 2

Date: October 2025. **Used:** PDF 7–9: assessor selection, conflicts of interest and payments.

https://www.bettercoal.org/s/Bettercoal-Lead-Assessor-Allocation-Procedures_v2_2025.pdf

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-064.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-064.pdf:

c1a83d069441f26f4e1d146914840bb446b0151e8a819f24a4b436c1aa2a0ec7

DOC-065. Bettercoal Code 2.0

Date: March 2021. **Used:** Later Code edition; not applied retrospectively in the article to the 2017–2018 site visits.

<https://www.bettercoal.org/s/BettercoalCode20-English.pdf>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-065.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-065.pdf:

7bfd9a05506f67a5a600f7d3dd6bf76f09b90ed0cdeb501ef3395d44b1ce62169

DOC-066. Bettercoal. Founding press release

Date: 18 April 2012. **Used:** PDF 1, paragraph after the opening statement; PDF 1–2: seven founders, the first company to join, the Chair and BSR's support.

https://public.euracoal.eu/download/Public-Archive/Library/Press-Releases/Bettercoal_press_release_final_18042012.pdf

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-002.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-066.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-066.pdf:

45f4aa2639376d9173c349621d8d102cebf0d7784e69036d7a95d4fb0ca33fbc

[CLM-002](#)

DOC-067. Companies House. Appointment of Nadja Wendler as a RECOSI director

Date: Appointment 27 November 2025; filed 19 December 2025. **Used:** PDF 1, form AP01; AP01, PDF 1.

<https://find-and-update.company-information.service.gov.uk/company/07968009/filing-history/MzQ5NTQwMDkxMmFkaXF6a2N4/document?format=pdf&download=0>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-005.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-067-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-067-extract.html:
f3ee249a3aa1c4be9f106f1c3727b148a1aa828dc1135ab713bcd6f16575f92d

[CLM-005](#)

DOC-068. Companies House. Termination of Frank Plümacher's directorship

Date: 27 November 2025; filed 15 December 2025. **Used:** PDF 1, form TM01; TM01, PDF 1.

<https://find-and-update.company-information.service.gov.uk/company/07968009/filing-history/MzQ5Mzk5OTA1M2FkaXF6a2N4/document?format=pdf&download=0>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-004.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-068.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-068.pdf:
7f58956a2002efd549c27a42fc3d5e4727181b2dbd669cab98c65d5eeb345d88

[CLM-004](#)

DOC-069. RECOSI. Articles of Association

Date: Filed 13 December 2023. **Used:** PDF 10, provision 16.1; visual reading of the scan; constitutional document at Companies House.

<https://find-and-update.company-information.service.gov.uk/company/07968009/filing-history/MzQwMzM2MTEyNmFkaXF6a2N4/document?format=pdf&download=0>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-053.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-069.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-069.pdf:
e0d9201ebb3ab5bbd4c0d62e1b2f0cd1b189ad94a58d01f2caa41d9eb3d9664b

[CLM-053](#)

DOC-070. Bettercoal. Financial Statements 2017

Date: 31 December 2017. **Used:** PDF 4, Balance sheet; PDF 4: balance sheet; PDF 6: members and guarantee.

<https://find-and-update.company-information.service.gov.uk/company/07968009/filing-history/MzIxMjAyNzQ0MmFkaXF6a2N4/document?format=pdf&download=0>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-045.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-070.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-070.pdf:
9cc9d850180942215c8f9447e4bb128cbabf9be8cd82d1a79bcf4c0e733a9603

[CLM-045](#)

DOC-071. Bettercoal. Financial Statements 2018

Date: 31 December 2018. **Used:** PDF 4, Balance sheet; PDF 4: abridged balance sheet, no Income Statement in the filed set.

<https://find-and-update.company-information.service.gov.uk/company/07968009/filing-history/MzIzODM0ODk1MWFkaXF6a2N4/document?format=pdf&download=0>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-045.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-071.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-071.pdf:
dfe4f5498bbc85c4b908f3af89eed06251f81a1de85919a3c99d8677d8ad91b7

CLM-045

DOC-072. Bettercoal. Financial Statements 2019

Date: 31 December 2019. **Used:** PDF 4, Balance sheet; PDF 4: balance sheet, approval 30 June 2020, signature on behalf of the Board — F. Pluemacher.

<https://find-and-update.company-information.service.gov.uk/company/07968009/filing-history/MzI3MzY3MDIzMWFKaXF6a2N4/document?format=pdf&download=0>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-045.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-072.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-072.pdf:
1affd70538c1e47d314df3355a635e72fe1d60674b281958570ec41e4a99e80f

CLM-045

DOC-073. Bettercoal. Financial Statements 2020

Date: 31 December 2020. **Used:** PDF 4, Balance sheet; PDF 4: balance sheet, approval 20 May 2021.

<https://find-and-update.company-information.service.gov.uk/company/07968009/filing-history/MzMwNDg5NDkzNWFKaXF6a2N4/document?format=pdf&download=0>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-045.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-073.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-073.pdf:
260b0dfd6242998824d3f347d1f24d660ce166264e6642a5439bf9a0caf58d5e

[CLM-045](#)

DOC-074. Bettercoal. Financial Statements 2021

Date: 31 December 2021. **Used:** PDF 4, Balance sheet; PDF 4: balance sheet; PDF 6: eight companies on the Board and the Executive Director.

<https://find-and-update.company-information.service.gov.uk/company/07968009/filing-history/MzM0ODlyOTcwMWFkaXF6a2N4/document?format=pdf&download=0>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-045.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-074.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-074.pdf:
ac2c591ea3b9241c075c42c19d8546c00d664486f063f366ae928857b2099b64

[CLM-045](#)

DOC-075. Bettercoal. Financial Statements 2022

Date: 31 December 2022. **Used:** PDF 4, Balance sheet; PDF 4: balance sheet; PDF 7: Board membership and members.

<https://find-and-update.company-information.service.gov.uk/company/07968009/filing-history/MzM4ODgxODczMmFkaXF6a2N4/document?format=pdf&download=0>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-045.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-075.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-075.pdf:
8fa1192d67d0c3384980759ecd468748dea214a5320afee5100df2233c19e002

[CLM-045](#)

DOC-076. Companies House. Appointment of Frank Plümacher as a Bettercoal director

Date: 18 June 2019; filed 27 June 2019. **Used:** PDF 1, form AP01; visual reading of the scan; AP01, PDF 1: appointment as director on 18 June 2019. Uniper's report dates election as Chair to April 2019; these are different roles and events.

<https://find-and-update.company-information.service.gov.uk/company/07968009/filing-history/MzIzNzk3ODcyOWFkaXF6a2N4/document?format=pdf&download=0>

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-004.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-076-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-076-extract.html:
49b7b16bf60df7bfcba1eaca9b89841f48e11f079a3916ce3301fc54a13db8a9

[CLM-004](#)

DOC-077. Volza. Suppliers of Uniper Global Commodities SE

Date: Page updated 26 September 2026. **Used:** Trade-data aggregator; the public table does not disclose individual shipment dates.

<https://www.volza.com/company-profile/uniper-global-commodities-se-451916/import/suppliers/>

Acquisition: Web reading / link from the baseline article. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The complete source file is not preserved in the working archive.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-078. Uniper. Sustainability Report 2017, Short version

Date: May 2018; reporting year 2017. **Used:** PDF 17, imprint.

https://www.uniper.energy/system/files/2024-04/uniper_group_sustainability_report_2017.pdf

Acquisition: Web reading / link from the baseline article. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The complete source file is not preserved in the working archive.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-079. Bettercoal suspends activities in Russia with immediate effect

Date: Statement dated 28 April 2022; page heading dated 3 May 2022. **Used:** Statement dated 28.04.2022; page published 03.05.2022; suspension of plan verification and of Russian producers' use of their status.

<https://www.bettercoal.org/news/bettercoal-suspends-activities-in-russia-with-immediate-effect>

Acquisition: Saved web page. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-033.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-079-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-079-extract.html:
aaaa693a62bb1458942ae94dd614edeb58323705740bd43c4f2cf17ceba459cb

[CLM-033](#)

DOC-080. Cadastral engineer's report dated 3 July 2019. Page 1 with personal data redacted

Date: 3 July 2019; inspection 26 April 2019. **Used:** Complete anonymised report page, 03.07.2019; full page 1: personal data, the inspected house's address, coordinates and signature redacted. The distance concerns the house inspected, not Natalia's flat.

#plate-23

Acquisition: Public copy with personal data redacted. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-035.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-080-public.png. Complete page with personal data redacted

SHA-256 of supplied file public-sources/DOC-080-public.png:
486cc2f3b9891bdaca843522c983d24579ce046d4e9287eafff3c3127b94857d

CLM-035

DOC-081. Uniper SE. Annual General Meeting on May 19, 2021 — Results of the Vote

Date: 19 May 2021; archived snapshot dated 21 May 2023, 16:25:34 UTC. **Used:** PDF 1, TOP 4; headings and results row; PDF 1, item 4. Valid votes: 322,950,342; in favour: 305,116,131; against: 17,834,211. Original address: https://www.uniper.energy/sites/default/files/2022-03/2021_AGM_Uniper_SE_Results_of_the_Vote_EN.pdf.

https://web.archive.org/web/20230521162534id_/https://www.uniper.energy/sites/default/files/2022-03/2021_AGM_Uniper_SE_Results_of_the_Vote_EN.pdf

Acquisition: Saved PDF. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Passages identified in claim cards CLM-039.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-081.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-081.pdf:
049e117496891b9d89a52e4eccc68cda59d695bfabbd6ca75013961e3700c7ce

CLM-039

DOC-082. Uniper. Sustainability resources — link to the article The dilemma of investing in social and environmental remediation activities

Date: Checked on 28 October 2026. **Used:** The former cr.uniper.energy address does not open; the later address /sustainability/dilemma-investing-social-and-environmental-remediation-activities redirects to Uniper's home page. Text and verification details are preserved in the working archive.

<https://www.uniper.energy/sustainability/sustainability-resources>

Acquisition: Web reading / link from the baseline article. **Recorded preservation:** The precise acquisition time was not recorded; verified passages are identified above.

Reviewed: Linked material; passages used are identified in the entry.

Preservation of the original: The complete source file is not preserved in the working archive.

Supplied file: File not included. No file is included in the public package; the source is available via the stated link when the website is accessible

DOC-083. RECOSI. Annual Report 2025

Date: Reporting year 2025; published 17.08.2026. **Used:** PDF 12, Finance; PDF 18, Continuous Improvement Plan progress, key and footnote *; PDF 17, Welcoming producers; PDF 10–12, 16–18.

<https://static1.squarespace.com/static/65a1303a13bfdc12f7331a58/t/6a82c9d4c6911b7d0ae857d4/1786956244393/RECOSI%2BAnnual%2BReport%2B2025.pdf>

Acquisition: Saved PDF. **Recorded preservation:** 2026-10-28T19:34:16.982Z.

Reviewed: Passages identified in claim cards CLM-047, CLM-048, CLM-050.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-083.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-083.pdf:
9252782d7bf490f75c469678981e3f0757c3eb979d146c2f4c38904b02a99c38

[CLM-047](#) · [CLM-048](#) · [CLM-050](#)

DOC-084. Kemerovo Regional Court. Appellate decision No. 33-2762/2026

Date: 02.04.2026 (date within the document). **Used:** Decision of 02.04.2026, paragraphs on the final judgment of 28.05.2024; reasoning section.

<https://sudact.ru/regular/doc/myR3PtM1MTg1/>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T19:34:19.448Z.

Reviewed: Passages identified in claim cards CLM-052.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-084-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-084-extract.html:
e23d26ac8712b9b5ea70f7bf65ee172b310c2e6bd77a60462281391da4299d0e

[CLM-052](#)

DOC-085. Kemerovo Regional Court. Appellate decision No. 33-2951/2026

Date: 26.03.2026 (date within the document). **Used:** Decision of 26.03.2026, paragraph beginning 'During consideration of the criminal case'; reasoning section.

<https://sudact.ru/regular/doc/KmSgPfaskYgW/>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T19:34:19.449Z.

Reviewed: Passages identified in claim cards CLM-052.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-085-extract.html. Editorial text extract: not the complete original or a page image

SHA-256 of supplied file public-sources/DOC-085-extract.html:
69b6a9cac0c58fc7abaf3ae9dc729d448a6709bddd9f4f81e70155a97c6926a6

[CLM-052](#)

DOC-086. Prosecutor General's Office. Announcement of the judgment against SDS executives; alternative address for DOC-021

Date: 25.03.2025. **Used:** HTML.

<https://epp.genproc.gov.ru/ru/gprf/mass-media/news/main/e5606112/>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T19:34:19.450Z.

Reviewed: Prosecution announcement of the judgment; alternative address for DOC-021.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-086-original.html. Saved source HTML of the public page; bytes unchanged; external resources not included

SHA-256 of supplied file public-sources/DOC-086-original.html:
108113d297fc3bc20b6efb584e0f9bfc0e7720af891ef2c78bcbaf390530b534

DOC-087. RECOSI. Publication of the 2025 annual report

Date: 17.08.2026. **Used:** HTML.

<https://www.recosi.com/news/recosi-launches-2025-annual-reportnbsp>

Acquisition: Saved web page. **Recorded preservation:** 2026-10-28T19:34:21.294Z.

Reviewed: RECOSI announcement of the report's release, heading and publication date.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-087-original.html. Saved source HTML of the public page; bytes unchanged; external resources not included

SHA-256 of supplied file public-sources/DOC-087-original.html:
4e1c5be32e4c92a634c350d8840798476a4abfb13dd88a03aabcd8dad1bbdb4a

DOC-088. Dutch Coal Covenant. Progress report 2017/18

Date: Reporting period: September 2017–October 2018. **Used:** PDF 24 / printed 24, right column, first paragraph; PDF 24 / printed 24, External Reporting; PDF 24.

<https://www.rwe.com/-/media/RWE/documents/09-verantwortung-nachhaltigkeit/nl/Progress-report-on-the-voluntary-agreement-2018.pdf>

Acquisition: Saved PDF. **Recorded preservation:** 2026-10-28T19:57:56.121Z.

Reviewed: Passages identified in claim cards CLM-051, CLM-055.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-088.pdf. Original public PDF, bytes preserved unchanged

SHA-256 of supplied file public-sources/DOC-088.pdf:
9f9d1fae72ef87183f35b0eecf41a91058a3b5b805da2649ba106c370b449a38

[CLM-051](#) · [CLM-055](#)

DOC-089. Russian Emergencies Ministry. State report ‘On the Protection of the Population and Territories of the Russian Federation from Natural and Technological Emergencies in 2021’

Date: 2022; reporting period 2021. **Used:** Emergencies Ministry state report for 2021, PDF 34 / printed 34; PDF 34: accident of 25.11.2021 and death toll.

https://53.mchs.gov.ru/uploads/resource/2022-09-13/2021-god_166308006554935819.pdf

Acquisition: PDF from the Russian Emergencies Ministry’s official website. **Recorded preservation:** 2026-10-28T20:54:20.530Z.

Reviewed: Passages identified in claim cards CLM-030.

Preservation of the original: The source file is preserved in the working archive; its checksum has been checked.

Supplied file: public-sources/DOC-089-PDF34.pdf. PDF page 34 extracted from the state report; original page unmodified

SHA-256 of supplied file public-sources/DOC-089-PDF34.pdf:
f2b3bdb6b004fe2171f28cd118eed8a19fb1fe6a6e887c1ef4118f88700524b

[CLM-030](#)

Appendix A. Documentary pages

Below are reproductions of key pages and excerpts. Document covers were not recreated. Highlighting on marked copies was added by the editors; the original is available through the register link. The cadastral report uses a complete page with personal data redacted.

A1. SDS sites visited and covered



- 'Pay-to-pollute' payments where the project owner pays for the 'right' to emit / discharge to the environment in accordance with its permits;
- Liabilities if the above environmental requirements are not met.

Upon termination or expiration of a subsoil licence, the licence holder must decommission the operation and comply with environmental protection and industrial safety requirements. This means that planning for closure typically only begins late in the mining lifecycle.

Mining operations are considered by Russian law to be hazardous industrial operations and are regulated by Federal Law "On Industrial Safety at Hazardous Industrial Facilities" (21 July 1997), which establishes a number of legal requirements relating to permitting and licensing, certification of equipment, training of specialists and ongoing compliance health and industrial safety requirements.

The Labour Code of the Russian Federation (2001) is the main legal act regulating working conditions of employees. In addition, there are numerous laws and regulations on specific areas such as minimum wage, social benefits, occupational health and safety, freedom of association, etc.

It is worth noting that Russia is not a member of the Extractive Industries Transparency Initiative (EITI), the global standard for promoting open and accountable management of oil, gas and mineral resources.

C. Assessment Information

Assessment Scope & Country	Russia: <ul style="list-style-type: none"> ▪ Salek / Vostochnui Openpit Mine ▪ Prokopjevskij Openpit Mine ▪ Kiselevskij Openpit Mine ▪ Sibenergougol Openpit Mine ▪ Chernigovets Openpit Mine ▪ Listvyazhnaya Underground Mine ▪ Yuzhnaya Underground Mine ▪ Pervomayskij Openpit Mine ▪ SDS-Ugol corporate headquarters
Site-Assessment Scope	<ul style="list-style-type: none"> ▪ SDS-Ugol corporate headquarters ▪ Salek and Vostochnui Mines (Bazovaya St., 6, Kiselevsk, Kemerovo region) ▪ Chernigovets Mine (Berezovskiy, Kemerovo region) ▪ Listvyazhnaya Mine (Gramoteino, Kemerovo region)
Step 1: Supplier Commitment	Completed in September 2017
Step 2: Desktop Review	Completed in September 2017

4

Documentary figure A1. SDS sites visited and covered. DOC-020, PDF p. 4. 2019-01-09. Raster rendering of the complete PDF page, with content unchanged. Full source.

A2. Dates, team and interviewees of the SDS assessment



Step 3: Site-Assessment	Completed in November 2017
Step 4: Continuous Improvement Plan	Agreed in May 2018 ²
Step 5: Re-Assessment	Planned for November 2022 ³
Assessment Team	Paul Mitchell (Lead Assessor), Julija Menise and Tatiana Vasenko

Stakeholders

The following organisations were interviewed as part of the Assessment:

- Russian Independent Union of Coal Industry Workers (Rosugleprof) at Salek / Vostochnui, Chernigovets and Listvyazhnaya sites;
- Federal Service of Ecological, Technological and Nuclear Control of the Russian Federation (RosTechNadzor);
- Federal Service of Control of Natural Resource Use;
- State Labour Inspectorate in Kemerovo Region;
- UN Development Programme;
- Civil organization 'Eco-defence';
- Centre for support of indigenous peoples of the North (CSIPN);
- Civil organization 'Revival of the village of Kazas and the Shor people'; and
- Inhabitants of Ananjino, Apanas, Kostenkovo villages.

The Assessment Team also attended a meeting between the local government representatives and inhabitants of the southern Kuzbass villages affected by coal mining operations (including SDS-Ugol mine sites) in Kostenkovo village.

² Timeline according to the previous Bettercoal Assessment Programme procedures.

³ The Assessment cycle is five years. See the [Assessment Manual](#) for more details.

A3. Ratings 2.2 and 6.9 alongside Immediate Resolutions



D. Supplier Performance

Supplier Performance is assessed against the 10 Principles of the [Bettercoal Code](#) and associated Provisions (1.1-10.7). The ratings are explained in Annex 2.

Overall performance

Below are SDS Ugol's ratings against the Bettercoal Code:

	Meets	Substantially Meets	Partially Meets	Misses
General Implementation Expectations				
Principle 1		1.1		
Principle 2		2.3	2.1	2.2
Business Ethics				
Principle 3				3.1
Principle 4			4.1	
Human Rights and Social Performance				
Principle 5		5.2	5.3	5.1, 5.4
Principle 6	6.2, 6.4	6.1, 6.3, 6.7	6.5, 6.6, 6.9	6.8
Principle 7			7.1	
Environment				
Principle 8			8.1	
Principle 9		9.1, 9.2, 9.3		
Principle 10	10.5, 10.6, 10.7	10.3, 10.4	10.1	10.2

Immediate Resolutions

An 'Immediate Resolution' is an action taken to address such eventualities and are different from other improvements identified by the Bettercoal Assessment Process as they are prioritised for completion in the Continuous Improvement Plan.

There were no immediate resolutions found during the Assessment of Siberian Business Union Coal.

Continuous Improvement

For each Provision that the Assessors identify a need for improvement, the Supplier will be responsible for implementing the steps recommended by the Assessors to ensure that it is continuously improving its systems, processes, procedures, and practices with the goal of full alignment with the requirements of the Code.

A3a. How to read the SDS group's ratings

	Meets	Substantially Meets	Partially Meets	Misses
General Implementation Expectations				
Principle 1		1.1		
Principle 2		2.3	2.1	2.2
Business Ethics				
Principle 3				3.1
Principle 4			4.1	
Human Rights and Social Performance				
Principle 5		5.2	5.3	5.1, 5.4
Principle 6	6.2, 6.4	6.1, 6.3, 6.7	6.5, 6.6, 6.9	6.8
Principle 7			7.1	
Environment				

Original excerpt, highlighting added by the editors. DOC-020, PDF 6. Complete page in the preceding appendix; source PDF in the supplied archive.

Table headings: Meets; Substantially Meets; Partially Meets; Misses. The key on PDF 10 is reproduced in A4.

2.2 Whistleblowing / Grievance: Misses. 6.9 Health & Safety: Partially Meets. These are SDS-Ugol group ratings.

On the same PDF page 6: 'There were no immediate resolutions found during the Assessment of Siberian Business Union Coal'. This is a separate urgency category; compliance ratings are shown in the table.

Comparison: the company's statement of 20.03.2018 characterises the result as a positive conclusion of compliance. Bettercoal's public report also contains the ratings shown. What problems lay behind them, when were they resolved, and who verified this?

Cards: CLM-019 · CLM-020 · CLM-054

A4. Key to compliance levels



Annex 2: Assessment Rating Options

Rating	Explanation
Meets	<p>Supplier's operating practices are fully aligned with the Code.</p> <p>There is strong evidence of implementation of the Suppliers' policies, systems, procedures and processes that enable alignment with the Code, and of a thorough understanding of the requirements of the Code Provisions.</p>
Substantially Meets	<p>The Supplier's practices are aligned mostly, but not fully, with the Code.</p> <p>The Supplier has policies, systems, procedures, and processes in place to enable alignment with the Code, but there are isolated incidents of gaps in implementation.</p>
Partially Meets	<p>The Supplier is demonstrating efforts to put in place the policies and practices to align with the Code, but implementation is at its early stages and is incomplete.</p> <p>For example, the Supplier has published a policy that aligns with a requirement of the Code, but the Assessment concludes that the policy is not being implemented fully or that the scope of the policy falls short of the coverage required by the Code.</p>
Misses	<p>The Supplier has not begun to put in place practices to align with Code, or there is systemic failure of the practices resulting in total misalignment with the Code.</p>

For more detailed information, see the [Assessment Manual](#).

Documentary figure A4. Key to compliance levels. DOC-020, PDF p. 10. 2019-01-09. Raster rendering of the complete PDF page, with content unchanged. Full source.

A5. KRU assessment itinerary



C. Assessment Information

Assessment Scope & Country	Russia: <ul style="list-style-type: none"> ▪ Kedrovskiy coal strip mine, ▪ Mokhovskiy coal strip mine, ▪ Bachatskiy coal strip mine, ▪ Krasnobrodskiy coal strip mine, ▪ Taldinskiy coal strip mine, ▪ Kaltanskiy coal strip mine.
Site-Assessment Scope	<ul style="list-style-type: none"> ▪ (November 2015) - Krasnobrodskiy Mine Site ▪ (May 2017) – Batchatsky Mine ▪ (May 2017) – Taldinsky Mine
Step 1: Supplier Commitment	Completed in November 2017*
Step 2: Desktop Review	Completed in April 2015
Step 3: Site-Assessment	Completed in November 2015 Reassessment visit in May 2017
Step 4: Continuous Improvement Plan	Agreed in November 2015
Step 5: Re-Assessment	Planned for first half of 2020
Assessment Team	James McNally and Yelena Borovikova (SLR consulting)

*Letter of Commitment only required after process review in 2017

Stakeholders

The following stakeholders were interviewed as part of the Assessment:

- KRU Corporate Management team
- Chairman of a Trade Union
- Director of Geology of the Department of Geology and Licencing of Kemerovo oblast
- Doctor of the local in-and-out clinic
- Principal of the secondary school No. 70 and specialists of the local administration
- Department of labour protection and industrial safety

Documentary figure A5. KRU assessment itinerary. DOC-043, PDF p. 5. Historical public report. Raster rendering of the complete PDF page, with content unchanged. Full source.

A6. SUEK assessment sites



C. Assessment Information

Assessment Scope & Country	<p>Russia:</p> <p>Zabaikalye region</p> <ul style="list-style-type: none"> ▪ Kharanorsky open pit ▪ Apsatsky open pit ▪ Vostochny open pit <p>Kemerovo region</p> <ul style="list-style-type: none"> ▪ Kirova underground mine ▪ Rubana underground mine ▪ Komsomolets underground mine ▪ Polysaevskaya underground mine ▪ Taldinskaya-Zapadnaya 1 underground mine ▪ Taldinskaya-Zapadnaya 2 underground mine ▪ Yalvskogo underground mine ▪ Zarechny open pit ▪ Kamyshtansky open pit ▪ 5 coal washing plants <p>Krasnoyarsk region</p> <ul style="list-style-type: none"> ▪ Borodinsky open pit ▪ Nazarovsky open pit ▪ Berezovsky open pit <p>Primorye region</p> <ul style="list-style-type: none"> ▪ Novoshakhtinskoye, <ul style="list-style-type: none"> ○ Pavlovsky open pit ○ Severnaya Depressia open pit ▪ Nekkovo open pit ▪ Coal washing plant <p>Buryatia region</p> <ul style="list-style-type: none"> ▪ Tugnuisky open pit ▪ Nikolsky open pit ▪ Coal washing plant <p>Khakasia region</p> <ul style="list-style-type: none"> ▪ Chernogorsky open pit ▪ Vostochno-Beisky open pit ▪ Izykhsky open pit ▪ Coal washing plant <p>Khabarovsk region</p> <ul style="list-style-type: none"> ▪ Bureinsky open pit ▪ Provoberezhny open pit ▪ Severnaya underground mine ▪ coal washing plants
Site-Assessment Scope* (following sampling methodology described in the Assessment Manual)	<ul style="list-style-type: none"> ▪ Taldinskaya –Zapadnaya 1 underground mine ▪ Taldinskaya –Zapadnaya 2 underground mine ▪ Yalvskogo underground mine ▪ Zarechny open pit ▪ Rubana underground mine

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Documentary figure A6. SUEK assessment sites. DOC-044, PDF p. 5. 31 January 2020. Raster rendering of the complete PDF page, with content unchanged. Full source.

A7. Dates and mines of Taldinskaya Mining Company



It is worth noting that Russia is not a member of the Extractive Industries Transparency Initiative (EITI), the global standard for promoting open and accountable management of oil, gas and mineral resources.

C. Assessment Information

Assessment Scope & Country	Russia: <ul style="list-style-type: none"> Taldinskaya – Yuzhnaya underground mine Taldinskaya – Kyrgayskaya underground mine
Site-Assessment Scope	<ul style="list-style-type: none"> Taldinskaya – Yuzhnaya underground mine Taldinskaya – Kyrgayskaya underground mine
Step 1: Supplier Commitment	Completed in August 2017*
Step 2: Desktop Review	Completed in October 2016
Step 3: Site-Assessment	Completed in November 2018
Step 4: Continuous Improvement Plan	Agreed in September 2019
Step 5: Re-Assessment	Planned for 2023
Assessment Team	The Dragonfly Initiative <ul style="list-style-type: none"> Julija Menise (lead assessor) Tatiana Vasenko Vladimir Simov Peter Whitbread-Aburat

*Letter of Commitment only required after process review in 2017

Stakeholders

The following stakeholders were interviewed as part of the Assessment:

- Russian Independent Union of Coal Industry Workers (Rosugleprof) at Taldinskaya-Kyrgayskaya and Taldinskaya -Yuzhnaya
- Russian Independent Union of Coal Industry Workers (Rosugleprof) - Prokopjevsk regional branch of Rosugleprof
- Federal Service of Ecological, Technological and Nuclear Control of the Russian Federation (RosTechNadzor) - Siberian Division Prokopyevsk subdivision
- Federal Service for Supervision of Consumer Rights Protection and Human Well-Being (RosPotrebNadzor) – Regional division of RosPotrebNadzor of Kemerovo region for cities Kiselevsk, Prokopjevsk and Prokopyevsk district.

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Documentary figure A7. Dates and mines of Taldinskaya Mining Company. DOC-045, PDF p. 5. Historical public report. Raster rendering of the complete PDF page, with content unchanged. [Full source.](#)

A8. Uniper: assessments, chairmanship and 2019 purchases

Our Bettercoal engagement

GRI 103-2, 102-12, 102-43, 414-12 In order to establish adequate measures to prevent, monitor, and mitigate these risks in the coal supply chain, we participate in Bettercoal, a not-for-profit initiative established by a group of major European utilities committed to a more responsible coal supply chain. Bettercoal's assurance system is centered around a supplier assessment process: Bettercoal independently assesses the performance of coal mining operations against the ten principles of the Bettercoal Code. We use this information in our ESG due diligence process and in monitoring our supply chain. Bettercoal's strategy is to prioritize its engagement and to work with mining companies in the countries that export the most coal to Europe to promote the joint remediation of actual impacts. Consequently, the focus of Bettercoal members, including us, has recently been on addressing supplier and country-specific systemic issues in Colombia and Russia.

In April 2019, Frank Plümacher, our Executive Vice President for HSSE & Sustainability, was elected to serve as Chairman of Bettercoal's Board of Directors for the next three years.

In 2019 we purchased 13.8 million tons of coal through direct contracts. The majority of the coal was purchased from Russia and Colombia, the two countries we have prioritized for our work with Bettercoal.

Overall coal purchased via direct contract in 2019 by country of origin

Country of origin	% coal purchased
Russia ¹	35.1
Colombia	23.8
USA	18.6
Other ²	8.3
South Africa	9.2
Australia	2.6
Mozambique	1.3
UK	1.1

¹ Includes coal from Latvia
² Origin not traceable

Coal mine in Colombia



In 2019 we purchased 55% of our coal from suppliers that have pledged to adhere to the Bettercoal Code of Conduct, up from 49% in 2018. Through our continued engagement with Bettercoal and our procurement practices, we aim to increase this percentage going forward.

Also in 2019, Bettercoal continued to monitor the continuous improvement plans of the three major coal mining companies in Colombia. Bettercoal's Colombia working group, which is chaired by Uniper, successfully built relationships with all stakeholders involved in this complex environment:

business, government, international NGOs, and local communities. Although monitoring of the improvement plans with mining companies will continue, Bettercoal has recognized that action is also required from other stakeholders, such as local or national authorities. Consequently, in 2019 the Colombia working group prioritized these issues and designed a plan to address them. Members of the group were planning to visit Colombia in the first half of 2020 to put the plan into action. However, the trip had to be postponed due to the coronavirus pandemic. A number of the planned meetings will instead be held virtually.

A9. Uniper: Russian programme and reporting frequency

visited their facilities, evaluated their operations in light of the Bettercoal Code, and drafted improvement plans for their practices. The assessors did not just interview representatives of the mining companies. They also engaged with a wide range of other stakeholders in nearby communities, government entities, civil society, and organizations such as the United Nations Development Programme (UNDP). These companies are currently reporting at least bi-annually on their continuous improvement plans.

The RWG adopts a coordinated approach to monitoring suppliers' improvement plans, enhancing its members' country-context expertise, addressing risks arising from the country context, increasing the number of participating suppliers, and improving communications with key stakeholders.

Bettercoal also organized a roundtable talk to engage Bettercoal Suppliers and other mining companies to debate potential areas for improvement, and encourage companies to share knowledge. Grievance mechanisms, mine closure issues and recultivation activities were among the topics discussed because participants deemed them material.

The RWG will continue its efforts in 2020, placing a particular emphasis on increasing

its direct engagement with Bettercoal Suppliers, fostering knowledge sharing among them, and deepening its relationships with local stakeholders.

Bettercoal: Colombia Working Group

Uniper chairs the Colombia Working Group (CWG). Colombia, which provides about 13% of Europe's coal, is another Bettercoal priority country. In 2019 the CWG actively engaged with all three Bettercoal Suppliers in the country: Cerrejón, Drummond Ltd and Prodeco. It assessed the mining companies' progress in implementing their individual improvement plans, including environmental, health and safety issues, and negotiations with unions, and addressed the situation of specific leaders of social movements. The CWG also defined priorities to address complex and systemic challenges related to mining in Colombia as, for example, fostering increased dialogue and access to clean water for affected communities since these issues require more long-term and pointed action. More information is available at <https://bettercoal.org/>.

The CWG also defined priorities and drew up a roadmap to address complex and systemic challenges related to mining in Colombia that require more long-term, concerted action. Drawing on the experiences and knowledge



Children attending safety lessons as part of the Uniproshka for Children project

gained in its first year, the CWG is currently prioritizing the issues it wants to address from 2020 onward. It will discuss these issues in depth with coal producers, government entities, civil society organizations, unions, and other stakeholders during its visit to Colombia in 2020. Next, Bettercoal and the CWG will design a specific action plan for the key areas in which Bettercoal and its members can add value and maximize positive impact.

Teaching kids about safety

Unipro, which operates our power generation business in Russia, has a proven record as a good corporate citizen of the communities and regions where its power stations are

located. In fact, in 2018, the Russian Ministry of Energy gave it an award for being one of the industry's "best socially oriented organizations." One of its stakeholder-engagement programs is "Uniproshka for Children," the purpose of which is to teach preschool and primary schoolkids how to be safe and take a responsible attitude toward themselves and other people. It also creates a welcome opportunity for Unipro employees to volunteer. The activities vary by location. Colleagues from Smolenskaya power station in western Russia, for example, conducted a water safety lesson for children from a local school. They explained how to stay safe near bodies of water covered with ice as winter ends and the ice begins to melt. In Sharypovo

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A10. 2020 purchases and the inclusion of Latvia

Coal supply chain issues and our Bettercoal engagement

GRI 102-12/43, 414-1/2 In order to establish adequate measures to prevent, monitor, and mitigate human rights risks in the coal supply chain, we participate in Bettercoal, a not-for-profit initiative established by a group of major European utilities committed to a more responsible coal supply chain. Bettercoal's assurance system is centered around a supplier assessment process: Bettercoal independently assesses coal mining operations' performance against the ten principles of the Bettercoal Code. We use this information in our environmental, social, and governance (ESG) due diligence process and in monitoring our supply chain. Bettercoal's strategy is to prioritize its engagement and to work with mining companies in the countries that export the most coal to Europe to promote the joint remediation of actual impacts. Consequently, the focus of Bettercoal members, including us, has recently been on addressing supplier- and country-specific systemic issues in Colombia and Russia. For 2021, Indonesia and South Africa will also be included among the focus countries.

The Bettercoal assessment program, which is based on the Bettercoal Code reviewed in

2020, encompasses a wide range of topics, including detailed provisions for human rights due diligence in conflict-affected areas. In response to the assessments, coal mining companies design continuous improvement plans, which are integral to Uniper's due diligence and risk management.

Coal purchased under direct contracts in 2020 by country of origin

Country of origin	% coal purchased
Russia*	29.9
Colombia	29.7
Kazakhstan	22.2
South Africa	7.8
USA	7.7
Australia	2.7
* Includes coal from Latvia	

Bogota, Colombia.



Documentary figure A10. 2020 purchases and the inclusion of Latvia. DOC-004, PDF p. 74. Report for 2020. Raster rendering of the complete PDF page; content unchanged. Full source.

A11. 2021 purchases

- > Overview
- > Planet
- > **People & Society**
- > Responsible Governance
- > Appendix

- Secure and affordable energy supply >
- Human rights** >
- Just transition >
- Health, safety, and well-being >
- Fair and attractive employer >
- Diversity, equity, and inclusion >
- Corporate citizenship >

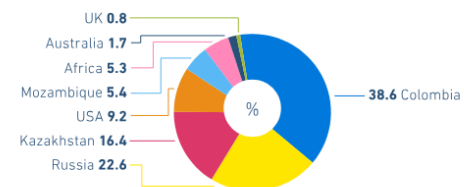
Uniper
Sustainability Report 2021

Coal supply chain issues and our Bettercoal engagement

GRI 102-37/43, 412-3, 414-1/2 In order to establish adequate measures to prevent, monitor, and mitigate human rights risks in the coal supply chain, we participate in Bettercoal, a not-for-profit initiative established by a group of major European utilities committed to a more responsible coal supply chain.

Bettercoal's assurance system is centered around a supplier assessment process: Bettercoal independently assesses coal mining operations' performance against the 12 principles of the Bettercoal Code 2.0. The code consists of a balanced set of ESG aspects, including detailed provisions for human rights due diligence in conflict-affected areas. In response to the assessments, coal mining companies design continuous improvement plans, which are integral to Uniper's due diligence and ESG risk management.

Coal purchased via direct contract in 2021 by country of origin



We track the proportion of coal we purchase under direct contracts from Bettercoal suppliers. In 2021, 71% of our directly purchased coal came from Bettercoal suppliers compared with 68% in 2020 (2019: 55%). Bettercoal has a country-prioritization strategy. In 2018 it therefore established working groups for Russia and Colombia. Their purpose is to better coordinate the monitoring of suppliers' continuous improvement plans and to facilitate dialogue between Bettercoal and relevant stakeholders. Uniper is chair of the Bettercoal Colombia working group and member of the Russia working group. Since Uniper's procurement of coal from Russia will cease after 2022, the future of Uniper's membership in the Russian working group is uncertain.

> Stakeholder engagement chapter

In line with our plan to expand our diversified gas business and progressively decarbonize it, we began to conduct ESG due diligence of individual projects and deals. We believe that working with strategic gas suppliers to mitigate ESG risks along the value chain can have significant positive impacts for communities involved and for the planet as a whole. Since 2020, we have been focusing on greenhouse gas (GHG) emissions transparency, including methane monitoring, as the most material issue to address.

Procurement of other goods and services

GRI 103-2/3, 412-3, 414-2 Uniper does business with thousands of suppliers every year. The selection of suppliers, contractors, and products is therefore a crucial step in the identification and prevention of human rights risks. Since 2016 Uniper expects its suppliers to comply with its Supplier Code of Conduct. In 2021 we introduced a spreadsheet tool to identify additional sustainability criteria, for example those related to the UN Sustainable Development Goals, for various product categories. Considering all tenders done in 2021, 13% included Sustainability Criteria. For 2022, the goal is to apply the Sustainability Criteria to 20% of all tenders. Germany's Act on Corporate Due Diligence Obligations in Supply Chains takes effect on January 1, 2023. This will ensure that our compliance will involve further improving our ability to identify products and service providers that might pose human rights risks, particularly in activities where service outsourcing is a common practice.

After selecting suppliers, we continually manage our relationship with them. Our management of the contractors who work at our operational assets focuses primarily on occupational health and safety, which is closely linked to human and labor rights protection. For example, we ask such contractors to be certified to ISO 45001, an internationally recognized standard for safety management systems, or to demonstrate that they have an adequate management system.

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Documentary figure A11. 2021 purchases. DOC-005, PDF p. 46. Report for 2021; published in 2022. Raster rendering of the complete PDF page; content unchanged. Full source.

A12. Vote: agenda item and 94.48%

Item of the AGM agenda	Shares for which valid votes were cast	Share of capital stock this represents	Yes	Quota	No	Quota
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Discharge of the members of the Supervisory Board for financial year 2020

Required majority reached

TOP 4	322,950,342	88.25%	305,116,131	94.48%	17,834,211	5.52%
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Documentary figure A12. Vote: agenda item and 94.48%. DOC-081, PDF p. 1. 19 May 2021; archived snapshot dated 21 May 2023, 16:25:34 UTC. Highlighting added by the editors; separate copy. Full source.

A13. Fortum's answer to question 39



16 (17)

environmental and human rights due diligence in relation to your business relationships with Norilsk Nickel? If yes, what are the results? If not, do you plan to conduct such due diligence? Please also state the reasons if you not conduct such due diligence.

- Fortum Recycling & Waste proceeds with its projects in Harjavalta, Finland, as initially planned. Both Fortum's pilot plant and our new plant under construction are investments in Finland, not in Russia, both are also 100% Fortum owned. Norilsk Nickel Harjavalta Oy, a company registered in Finland, is one of Fortum's counterparties in the cluster and one of the raw materials used is metal containing waste originating from e.g. Norilsk Nickel Harjavalta Oy site.
- As part of the investing process, Fortum has conducted its standard sustainability assessment addressing the activities of its counterparties. Fortum complies with all applicable laws and regulations, including sanctions, and is following the present situation closely. Neither Norilsk Nickel Harjavalta Oy nor its parent are currently sanctioned.
- The geopolitical situation further highlights the importance for investing in the Finnish and European battery value chain and thus the need for finding ways to sustainably improve the local availability of raw materials that are critical for the manufacture of batteries and help improve the recycling of industrial waste in Europe in general.

39. In November 2021 more than 50 miners were killed in a mine accident at the Listvyazhnaya mine in the Kemerovo region. Poor safety measures are the probable cause of the accident. Has Fortum or Uniper investigated the circumstances of the accident? Did Fortum or Uniper get coal deliveries from this mine?

- Neither Fortum or Uniper has been purchasing coal from this supplier in the past years.
- Both Fortum and Uniper are members of Bettercoal Initiative. Since the supplier in question is also a Bettercoal supplier, the Bettercoal secretariat is engaging with the company to understand the exact causes of the accident and the actions necessary to prevent such an accident in the future.

40. The Scarborough LNG gas in Australia project will produce levels of pollution which are equivalent to 15 coal-fired power stations and is planned in one of the most culturally and environmentally important areas of Western Australia. Are you aware of the climate impacts, risks for marine life and threats to 40.000-year-old Aborigine art which are linked to the gas extraction in Scarborough? Are you also aware of the two major court cases and local owner and public protests against the project in Australia? Will you cancel the sale and purchase agreement with the developer of the project, Woodside?

- We are aware of the court cases and the recent rejection of the supreme court against CCWA's (Conservation Council of Western Australia) challenges against Woodside's Scarborough project (1st March).

Documentary figure A13. Fortum's answer to question 39. DOC-052, PDF p. 16. 2022. Complete page; red-box highlighting added by the editors; source PDF preserved separately. Full source.

A13a. Exactly what Fortum was asked and what the company answered

39. In November 2021 more than 50 miners were killed in a mine accident at the Listvyazhnaya mine in the Kemerovo region. Poor safety measures are the probable cause of the accident. Has Fortum or Uniper investigated the circumstances of the accident? Did Fortum or Uniper get coal deliveries from this mine?

- Neither Fortum or Uniper has been purchasing coal from this supplier in the past years.
- Both Fortum and Uniper are members of Bettercoal Initiative. Since the supplier in question is also a Bettercoal supplier, the Bettercoal secretariat is engaging with the company to understand the exact causes of the accident and the actions necessary to prevent such an accident in the future.

Original excerpt, highlighting added by the editors. DOC-052, PDF 16. Complete page in the preceding appendix; source PDF in the supplied archive.

Question 39: ‘In November 2021 more than 50 miners were killed in a mine accident at the Listvyazhnaya mine in the Kemerovo region. Poor safety measures are the probable cause of the accident. Has Fortum or Uniper investigated the circumstances of the accident? Did Fortum or Uniper get coal deliveries from this mine?’ This is the shareholder’s wording.

Answer: ‘Neither Fortum or Uniper has been purchasing coal from this supplier in the past years. Both Fortum and Uniper are members of Bettercoal initiative. Since the supplier in question is also a Bettercoal supplier, the Bettercoal secretariat is engaging with the company to understand the exact causes of the accident and the actions necessary to prevent such an accident in the future.’

The question names the mine; the answer uses ‘this supplier’ and does not specify precise years. A purchasing history for the SDS group requires sellers, dates, volumes and mines of origin.

Cards: CLM-040

A14. Chair's foreword and the absence of site visits in 2021

FOREWORD FROM CHAIRMAN

2021 was another year when COVID-19 caused disruption and challenged all of us to review how we work and adapt to the changing global context. Site assessments are central to the work of Bettercoal, and we had hoped to get Lead Assessors back out on site in 2021. While this was not feasible, it has been positive to see the continued engagement from Bettercoal Producers, who have remained committed to the Bettercoal process through their Continuous Improvement Plans.

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FOREWORD FROM CHAIRMAN

Bettercoal

Annual Report 2021 04

We were pleased to welcome new member Grosskraftwerk Mannheim AG to our organisation this year. As an operator of hard-coal-fired power stations in Germany and generator of electricity and district heat, they have added value to our work, fully engaging in Bettercoal's work programme and encouraging suppliers to go through the assessment process. Our membership has been integral in motivating producers to undergo independent on-site assessments; we have assessed 69 mine sites to-date, over eight countries.

Bettercoal is grateful for the continued strong engagement and support of Members, as evidenced by their involvement in Bettercoal's Country Working Groups, which aim to monitor producers on their CIP progress, build in-depth country knowledge, and engage with local stakeholders. The active commitment of Members in our Colombia Working Group led to a positive virtual engagement programme in Colombia in 2021. We appreciate that so many stakeholders in Colombia met with Bettercoal over the two-month virtual engagement programme, where constructive discussions were held with stakeholders on the CWG's priority issues of fostering dialogue, water stewardship and responsible mine closure.

Bettercoal began 2021 with the launch of the new Bettercoal Code 2.0. The strengthening of due diligence and disclosure provisions were accompanied by the expansion of the Code to include two new principles on water stewardship and responsible mine closure and rehabilitation.

The new Code 2.0 ensures that Bettercoal remains the internationally recognised Standard for assessing, assuring and sustaining stringent ethical, environmental and social performance in the coal supply chain.

Over 2021, Bettercoal also underwent reviews and changes to its processes and structures. We continued the review of Bettercoal's governance and membership structures, with changes approved by Members at the Annual General Meeting. We also commenced a review of Bettercoal's assurance system, with initial changes recommended by the Technical and Advisory Committee and agreed by the Bettercoal Board in December. Bettercoal will be continuing this important work in 2022. These changes will help to ensure that Bettercoal is both strategically organised and sustainably equipped to continue its important work in raising standards in coal mining.

While 2021 posed challenges, I am pleased that Bettercoal has utilised this time to strengthen the Code, to review and update its governance and to start the important process of updating its assurance system.

We look forward to being back onsite in 2022 and, once again, meeting our stakeholders in-person.



Frank Plümacher
Chairman Bettercoal
Board of Directors



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Bettercoal

FOREWORD FROM CHAIRMAN

Documentary figure A14. Chair's foreword and the absence of site visits in 2021. DOC-056, PDF p. 3. Published 28 July 2022. Raster rendering of the complete PDF page; content unchanged. Full source.

A15. December 2021 webinar on Russian plans

COUNTRY WORKING GROUPS

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Russia Working Group

Bettercoal's Russia Working Group focused on developing a coordinated approach to the monitoring of Continuous Improvement Plans, and growing country and context expertise.

Facilitating the understanding of the Bettercoal Code and Guidance

As the foundation of our work, understanding and applying the Bettercoal Code and accompanying Guidance document to work towards continuous improvement in coal operations is key. Bettercoal translated and published the Bettercoal Code 2.0 and accompanying Guidance in Russian in 2021.

Biodiversity Management

Bettercoal aimed to engage in Member and Producer knowledge and expertise sharing around ESG challenges and best practice in coal mining. The RWG organised a webinar focused on Biodiversity Management, with topics including Biodiversity Conservation in Russia. Bettercoal Producers shared their perspective on challenges and their work on biodiversity management, while Bettercoal Members shared their experience of reclamation and biodiversity.

Helping Bettercoal Members Monitor and Mitigate Risk

In December 2021, Bettercoal held a webinar with the independent Lead Assessors, to go through the status updates on the Continuous Improvement Plans for all Bettercoal Russian Producers. This aimed to help Members understand the specific ESG issues identified, and the performance improvements being worked towards in specific coal operations to align with the Bettercoal Code.

In 2022, the work of the RWG and Bettercoal's engagement with Russian coal producers was paused. Bettercoal's statement can be found [here](#).

EXTERNAL ENGAGEMENT

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Bettercoal focused on virtual engagement programmes in 2021 due to the restrictions of the COVID-19 pandemic, successfully hosting webinars and participating in dialogue events that contributed to knowledge sharing on sustainability improvements across the coal supply chain, biodiversity management, Just Transition, and how the Bettercoal Code and assessment process can help organisations make ESG improvements in their coal supply chain.

Bettercoal continued to share content on its platforms, covering mining issues in Colombia, the UN Global Compact, and the importance of promoting a responsible coal supply chain.

Looking ahead to 2022, Bettercoal will continue to expand its work with stakeholders to hold an in-person engagement programme as well as foster dialogue and contribute on key topics, such as the Just Transition.



Documentary figure A15. December 2021 webinar on Russian plans. DOC-056, PDF p. 20. Published 28 July 2022. Raster rendering of the complete PDF page; content unchanged. Full source.

A16. Uniper employee in the secretariat and information provided to the Board



"The trip to Colombia with the Bettercoal Delegation helped me to get a broader picture of the impact of coal mining and I see with great interest that addressing these issues result in actions of the mining companies. The contribution of mining companies to the peace building process is one of the identified necessities and key requirements. Bettercoal suppliers in Colombia recently participated in a dialogue between the oil&gas and mining trade associations with the leadership of Commission for the Clarification of Truth, Reconciliation and Non-Repetition."

Frank Plümacher, Executive Vice President Sustainability & HSSE

To support Bettercoal's Secretariat in the assessment program and processes, a Uniper employee has been seconded for a period of two years, supporting the monitoring of the Suppliers' Continuous Improvement Plans implementation. This is part of a more active engagement of Bettercoal Members into the organisation's efforts.

Uniper also participated as an Observer in one of Bettercoals site assessment end of 2017 to get a clearer picture of mining standards in the US.

Uniper has held periodic discussions with several NGOs focused on ESG issues, particularly those relating to human rights along the coal supply chain. This group-wide campaign to meet, and engage with, relevant international NGOs and local groups active in Europe started in August 2017.

External Reporting

Uniper discloses the volumes of coal purchased annually for its own consumption, divided by country of origin, in its annual online sustainability report.²¹ The company's Supervisory Board receives updates on Uniper's responsible coal procurement on a regular basis.

²¹ For Uniper's 2017 Sustainability Report, see: <https://cr.uniper.energy/en/business-integrity/>

Documentary figure A16. Uniper employee in the secretariat and information provided to the Board. DOC-088, PDF p. 24. Reporting period: September 2017–October 2018. Complete page; red-box highlighting added by the editors; source PDF preserved separately. Full source.

A16a. Uniper employee and information for the Supervisory Board

To support Bettercoal's Secretariat in the assessment program and processes, a Uniper employee has been seconded for a period of two years, supporting the monitoring of the Suppliers' Continuous Improvement Plans implementation. This is part of a more active engagement of Bettercoal Members into the organisation's efforts.

Uniper also participated as an Observer in one of Bettercoals site assessment end of 2017 to get a clearer picture of mining standards in the US.

Uniper has held periodic discussions with several NGOs focused on ESG issues, particularly those relating to human rights along the coal supply chain. This group-wide campaign to meet, and engage with, relevant international NGOs and local groups active in Europe started in August 2017.

External Reporting

Uniper discloses the volumes of coal purchased annually for its own consumption, divided by country of origin, in its annual online sustainability report.²¹ The company's Supervisory Board receives updates on Uniper's responsible coal procurement on a regular basis.

Original excerpt, highlighting added by the editors. DOC-088, PDF 24. Complete page in the preceding appendix; source PDF in the supplied archive.

Upper box. To support Bettercoal's secretariat in its assessment programme and procedures, a Uniper employee was seconded there for two years to help monitor suppliers' implementation of improvement plans.

Lower box, External Reporting section. The company's Supervisory Board regularly receives updates on Uniper's responsible coal sourcing.

The intervening paragraphs describe observing an assessment in the USA and contacts with NGOs. The two highlighted relationships are recorded separately: secretariat support and information provided to the Supervisory Board. The seconded employee's name, employment dates and the plans' geographical scope are not stated in this excerpt.

Cards: CLM-051 · CLM-055

A17. RECOSI expenditure for 2025



A18. 2025 results: read using the key



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PROGRAMMES CONTINUED

Bettercoal Members' Implementation and Reporting Obligations (MIRO)

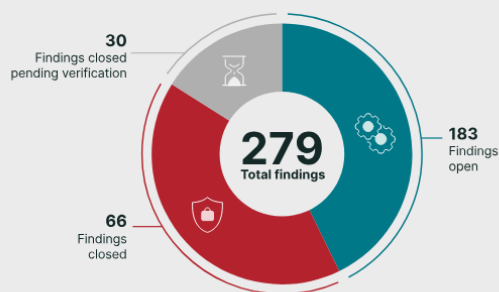
The proportion of coal purchased from Bettercoal Producers fell from 51% in 2024 to 37% in 2025, with a corresponding increase in coal purchased from non-Bettercoal Producers through direct contracts. This was not driven by any change in the number of Bettercoal Producers, which remained stable over the year. Rather, it reflects a change in sourcing by a limited number of Members; while the majority of Members' sourcing patterns remained broadly unchanged from the previous year.

This also reflects a wider dynamic: as total Member coal purchasing volumes have fallen substantially since 2018, the MIRO percentages are now more sensitive to sourcing decisions by individual Members

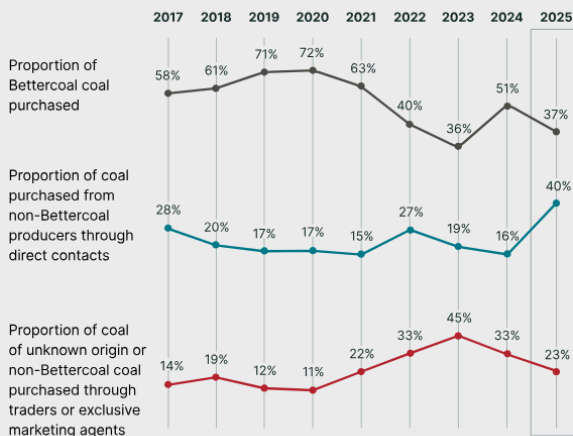
than in earlier years, when purchasing was spread across a larger volume base. This continued decline in coal purchasing reflects our Members' ongoing energy diversification strategies. In response, we are ensuring the Bettercoal Programme evolves alongside our Members' changing needs. The development of

the Bettercoal Desktop Assessment Process (see page 17) is one example of this evolution, providing producers with an earlier, more cost-effective entry point into the Programme and strengthening engagement across the supply chain even as purchasing volumes change.

Continuous Improvement Plan progress*



MIRO**



Bettercoal Producers in 2025: Six.

* Data reflects information updated by December 31, 2025.

** Data based on the information of Bettercoal Programme Members, reported by July 2026.

[Introduction](#)
[About RECOSI](#)
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[Financials & Performance](#)
[Programmes](#)
[Join Us](#)

Documentary figure A18. 2025 results: read using the key. DOC-083, PDF p. 18. Reporting year 2025; published 17.08.2026. Raster rendering of the complete PDF page, with content unchanged. Full source.

A19. Code 1.1: participation and reporting violations



- 2.1.12. Companies will identify the range of stakeholders who may be potentially affected and stakeholders who may be interested in their actions and consider how communicating about the operation might facilitate mutual understanding. Companies will develop and implement a stakeholder engagement plan that is scaled to the operation's risks and impacts and development stage, and is tailored to the characteristics and interests of the various stakeholders, including host governments, civil society, the private sector, and the affected communities. Where applicable, the stakeholder engagement plan will include differentiated measures recommended by interested parties to allow the effective participation of those identified as disadvantaged or vulnerable. Companies will use monitoring tools to provide early warning of potential challenges in the relationships among companies, communities, and other stakeholders.

2.2. Whistle-blowing and Grievance Mechanisms

- 2.2.1. Companies will provide a protected internal disclosure (whistle-blowing) mechanism that encourages Employees and stakeholders to report any activity that is contrary to the company's principles and ensures the protection of the whistle-blower.
- 2.2.2. Companies will have an operational grievance mechanism and fully support and cooperate with all, judicial and nonjudicial, local and international, traditional or national grievance and remedy mechanisms, where they already exist.
- 2.2.3. Companies will provide a grievance mechanism for employees (and their organisations where they exist) to raise workplace concerns related to any standard covered by this Code. It will, whether in parallel or integrated, ensure a grievance mechanism for other stakeholders, with special emphasis on the most vulnerable persons, groups, and organisations. The grievance mechanism shall be legitimate, accessible, predictable, equitable, transparent, Rights-Compatible, and a source of continuous learning as defined by the UN Guiding Principles on Business and Human Rights. The mechanism shall allow for anonymous complaints to be raised in a safe environment, addressed independently, and should not impede access to other judicial or administrative remedies that might be available under the law or through existing arbitration procedures, or substitute for grievance mechanisms provided through Collective Bargaining agreements.
- 2.2.4. As appropriate, the grievance mechanism will be developed in consultation with the stakeholder groups for whose use it is intended, and will focus on dialogue as the means to address and resolve grievances.
- 2.2.5. Companies will communicate to their employees that no employee shall suffer demotion, penalty, or other adverse consequences for voicing a concern, including refusing to pay a bribe or facilitation payment, even if this action may result in the enterprise losing business. Both employee-focused and Community-focused mechanisms should allow for possible anonymity.

2.3. Mine Closure

13

Documentary figure A19. Code 1.1: participation and reporting violations. DOC-053, PDF p. 14. Approved 28 June 2017; July 2018 edition. Raster rendering of the complete PDF page, with content unchanged. Full source.

A20. Code 1.1: health and safety



- 6.8.2. Companies will provide equal pay for work of equal value.²¹
- 6.8.3. Companies will pay employees a premium rate in accordance with applicable laws for work performed beyond the standard established hours. Activities requiring overtime work will be accepted voluntarily and will be infrequent in nature.
- 6.8.4. Companies will ensure that employees are not forced to buy goods and services from the company's own shops and facilities. Companies should ensure that these goods and services are not offered above market price.

6.9. Health and Safety

- 6.9.1. Companies will provide safe and healthy working conditions for employees and contracted workers, in accordance with ILO's occupational Health and Safety standards including health and safety conventions, recommendations, guidelines, and codes of practice; ILO Convention 176; and its associated Recommendation 183, along with the ILO Code of Practice on Safety and Health in Underground Coalmines. These conditions include but are not limited to:
- the minimisation, so far as reasonably practicable, of the causes of workplace Hazards;
 - appropriate safeguards between employees and all machinery, including mobile equipment;
 - appropriate monitoring systems for methane emissions inside mines;
 - adequate and appropriate labelling and storage of all chemicals and cleaning materials;
 - methods to protect employees and contracted workers from exposure to airborne particles and chemical fumes;
 - the identification and provision of appropriate Personal Protective Equipment (PPE) free of charge and the verification that it is current, worn, and used correctly;
 - workstations that are designed as appropriate to the task performed and to minimise occupational health risks, such as the need to exert excessive physical force, maintain an awkward posture for extended periods of time, or repetitively strain muscles, tendons, ligaments, or joints;
 - adequate lighting, ventilation, air quality, and temperatures (where safe noise levels cannot be guaranteed, protection should be provided);
 - adequate workplace hygiene at all times by conducting regular routine cleaning; safe and accessible potable drinking water and sanitary facilities for food storage;

²¹ In addition, compensation should preferentially be based on hours worked and not on production or piecework, as production rates are frequently beyond an individual worker's control, and these systems of compensation encourage the bypassing of safety procedures.

Documentary figure A20. Code 1.1: health and safety. DOC-053, PDF p. 22. Approved 28 June 2017; July 2018 edition. Raster rendering of the complete PDF page, with content unchanged. [Full source.](#)

A21. Code 1.1: air, dust and biodiversity



the final effluent criteria are consistent with guideline values as indicated in the IFC EHS mining guidelines.³⁵

9.3. Emissions to Air

- 9.3.1. Companies will, as defined by the IFC PS 2 Guidelines, quantify significant direct emissions from the facilities and mobile sources owned or controlled within the physical operational boundary (point source and fugitive), as well as indirect emissions associated with the off-site production of energy used by the company,³⁶ to an acceptable degree of accuracy. Companies will conduct quantification of Greenhouse Gas emissions in accordance with national standards, internationally recognised methodologies, and good practice.³⁷
- 9.3.2. Companies will develop and implement operating procedures related to minimising fugitive emissions from tailings facilities, waste dumps, stockpiles, and other exposed areas; and dust control associated with blasting, through the best available processes.
- 9.3.3. Companies will fully integrate dust control into operating procedures, particularly associated with blasting, drilling, and material transport and dumping.
- 9.3.4. Companies will implement adequate operating procedures and plans to prevent, detect, and in a timely manner, combat the outbreak and spreading of fires in operating and abandoned mines.

10. Principle 10. Companies shall integrate practices that protect and support biodiversity and ecosystem services impacted by their operations, throughout the life cycle of the mine.

10.1. General

- 10.1.1. Companies will undertake a comprehensive assessment of direct and indirect operational impacts and dependencies on biodiversity and ecosystem services and identify any significant residual impacts. This process will consider relevant threats to biodiversity and ecosystem services, especially focusing on habitat loss, degradation, and fragmentation; invasive alien species; overexploitation; hydrological changes; nutrient loading; and pollution. This process will also take into account the differing values attached to biodiversity and ecosystem services by affected communities and, where appropriate, other stakeholders.
- 10.1.2. Companies will seek to avoid impacts on biodiversity and ecosystem services. When avoidance of impacts is not possible, measures to minimise and mitigate impacts,

³⁵ The IFC EHS Guidelines for mining provide a minimum set of water quality effluent or discharge water quality standards that should be adopted in the absence of local or national guidelines and are intended to protect existing water quality. This is where operations/projects need to determine up front what their water discharge and treatment design criteria should entail.

³⁶ Project-induced changes in soil carbon content or aboveground biomass and project-induced decay of organic matter may contribute to direct emissions sources and shall be included in this emissions quantification where such emissions are expected to be significant.

³⁷ Estimation methodologies are provided by the Intergovernmental Panel on Climate Change, various international organisations, and relevant host country agencies.

A22. Uniper's account of visiting Kiselyovsk

Human rights May 2020

The dilemma of investing in social and environmental remediation activities

In times of Europe's coal phase out and global climate activism, it is essential to ensure and demonstrate that the remaining coal coming here is supplied responsibly.

As many know, we purchase this commodity mainly from Colombia and Russia, two countries where cumulative impacts of mining operations affected, and still do affect hundreds of people, mainly vulnerable rural communities with little access to effective remedies.

For example, while in Kuzbass in September 2019, as part of a Bettercoal mission, we managed to see the town of Kiselovsk, mentioned by the NGO Ecodefense as one of the most impacted by mining. Even if we stayed there for a very short time, it was sufficient to recognize how close to houses the mining operations are. Even more telling was the visit to the village of Chuvashka, where locals have been struggling for years with several local mining operators, whose community relations practices seemed quite underdeveloped.

As a result of the trip, we are now in contact with local stakeholders to support the transformation of inevitable resettlement activities in sustainable development programs. Moreover, we are looking into opportunities to give back to nature former mining areas which are now abandoned since the nineties and could be turned into new forests and grazing lands, following circular economy approaches which would then benefit both the environment and the local communities.

Documentary figure A22. Uniper's account of visiting Kiselyovsk. DOC-001. May 2020. Image of the preserved HTML; external styling not restored; highlighting added by the editors. Full source.

Highlighted passage and the preceding sentence: 'For example, while in Kuzbass in September 2019, as part of a Bettercoal mission, we managed to see the town of Kiselovsk, mentioned by the NGO Ecodefense as one of the most impacted by mining. Even if we stayed there for a very short time, it was sufficient to recognize how close to houses the mining operations are.'

The company then describes visiting Chuvashka. In the next paragraph, Uniper reports contacts with local stakeholders on resettlement and consideration of opportunities to rehabilitate abandoned mining areas. These paragraphs are preserved in the image.

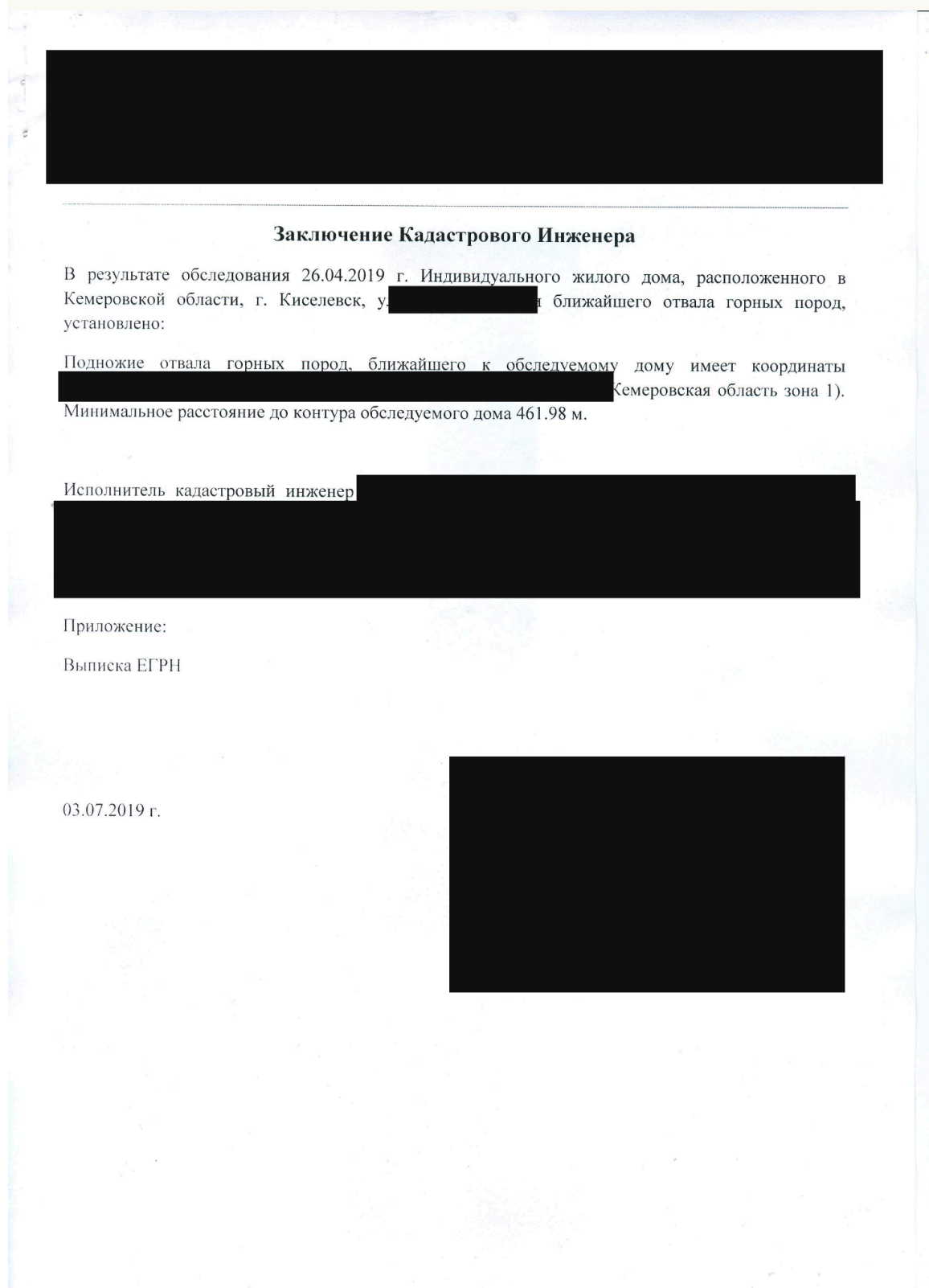
What the document shows: Uniper itself identifies the place, month, mission and its observation of mining beside homes. Individual delegation members are not named here. See CLM-034.

Source: Uniper, *The dilemma of investing in social and environmental remediation activities*. The page gives May 2020; the precise publication day is not stated. Archived snapshot: 18 June 2020, 23:01:43 UTC. Open archived copy. Original address.

Address check on 28 October 2026: the original cr.uniper.energy address was unavailable; the host name did not resolve. The archived copy returned HTTP 200. The later www.uniper.energy address redirected to the home page when opened through web viewing; a separate automated request received HTTP 403. These results do not establish why availability changed.

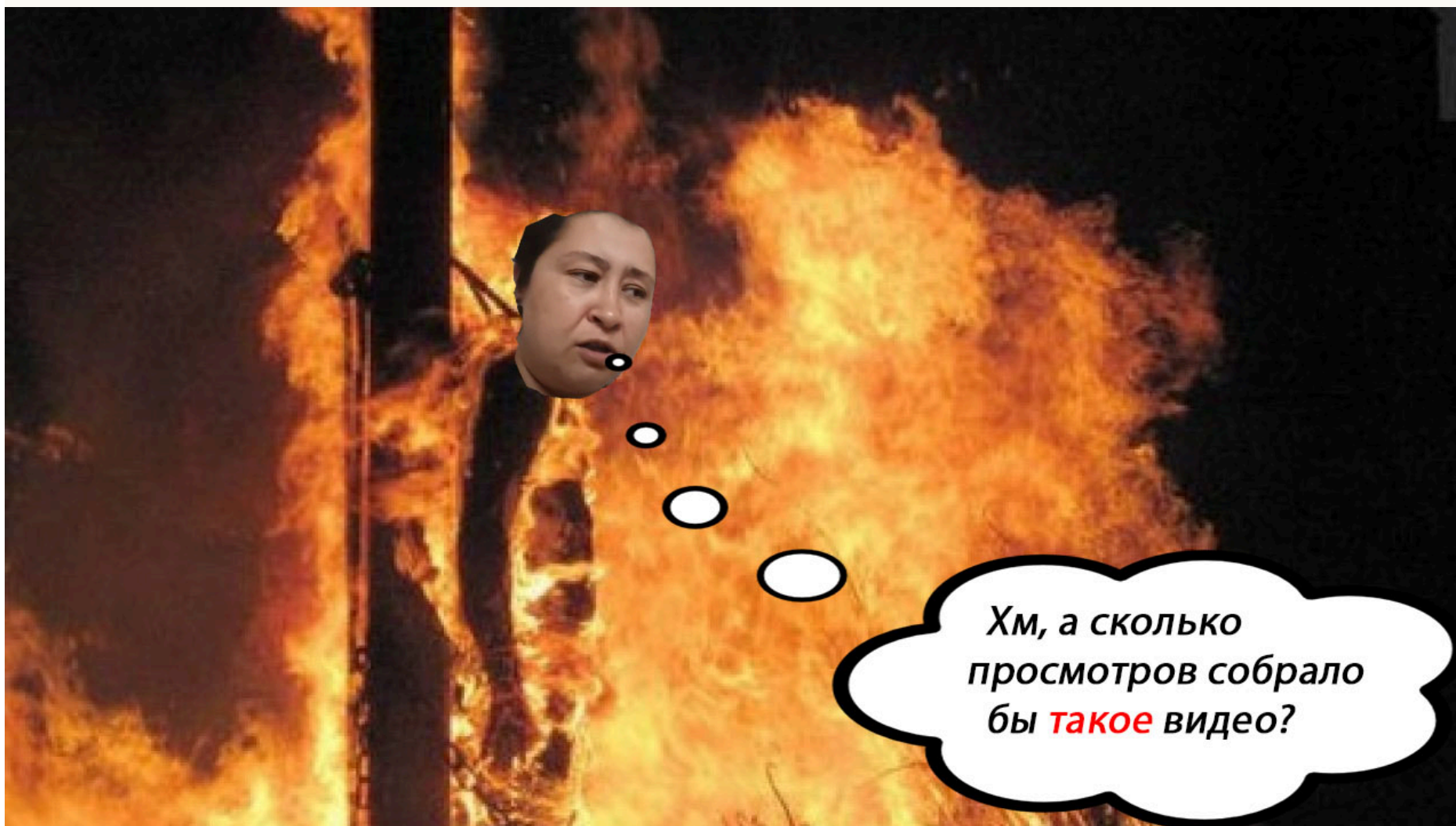
The image is a browser capture of the preserved source HTML. The text was not retyped; the website's external styling was not restored. Red underlining was added by the editors on a separate copy. The HTML and unhighlighted image are included in the sources package.

A23. The house inspected and the waste-rock dump: 461.98 metres



Documentary figure A23. The house inspected and the waste-rock dump: 461.98 metres. DOC-080, PDF p. 1. 3 July 2019; inspection 26 April 2019. Personal data redacted; complete page. Full source.

A24. Documentary publication featuring fire



Documentary figure A24. Documentary publication featuring fire. DOC-032. 21 August 2020. Image from the blog publication; not reconstructed. Full source.

A25. Balance sheet for 2017

BETTERCOAL (REGISTERED NUMBER: 07968009)

ABRIDGED BALANCE SHEET
31ST DECEMBER 2017

	Notes	2017 £	2016 £
FIXED ASSETS			
Tangible assets	4	778	1,251
CURRENT ASSETS			
Debtors		45,177	73,746
Cash at bank		334,450	235,562
		<u>379,627</u>	<u>309,308</u>
CREDITORS			
Amounts falling due within one year		148,709	115,613
NET CURRENT ASSETS		<u>230,918</u>	<u>193,695</u>
TOTAL ASSETS LESS CURRENT LIABILITIES		<u>231,696</u>	<u>194,946</u>
RESERVES			
Income and expenditure account		231,696	194,946
		<u>231,696</u>	<u>194,946</u>

The financial statements have been prepared and delivered in accordance with the provisions of Part 15 of the Companies Act 2006 relating to small companies.

All the members have consented to the preparation of an abridged Income Statement and an abridged Balance Sheet for the year ended 31st December 2017 in accordance with Section 444(2A) of the Companies Act 2006.

In accordance with Section 444 of the Companies Act 2006, the Income Statement has not been delivered.

The financial statements were approved by the Board of Directors on 27/6/2018 and were signed on its behalf by:

.....
 N Valerius - Director

The notes form part of these financial statements

A26. Balance sheet for 2018

BETTERCOAL (REGISTERED NUMBER: 07968009)

ABRIDGED BALANCE SHEET
31ST DECEMBER 2018

	Notes	2018 £	2017 £
FIXED ASSETS			
Tangible assets	4	305	778
CURRENT ASSETS			
Debtors		9,697	45,177
Cash at bank		489,895	334,450
		<u>499,592</u>	<u>379,627</u>
CREDITORS			
Amounts falling due within one year		271,753	148,709
NET CURRENT ASSETS		<u>227,839</u>	<u>230,918</u>
TOTAL ASSETS LESS CURRENT LIABILITIES		<u>228,144</u>	<u>231,696</u>
RESERVES			
Income and expenditure account		228,144	231,696
		<u>228,144</u>	<u>231,696</u>

The financial statements have been prepared and delivered in accordance with the provisions of Part 15 of the Companies Act 2006 relating to small companies.

All the members have consented to the preparation of an abridged Income Statement and an abridged Balance Sheet for the year ended 31st December 2018 in accordance with Section 444(2A) of the Companies Act 2006.

In accordance with Section 444 of the Companies Act 2006, the Income Statement has not been delivered.

The financial statements were approved by the Board of Directors on June 19th 2019 and were signed on its behalf by:



 N Valerius - Director

The notes form part of these financial statements

Documentary figure A26. Balance sheet for 2018. DOC-071, PDF p. 4. 31 December 2018. Complete balance-sheet page from the saved PDF. Full source.

A27. Balance sheet for 2019

BETTERCOAL (REGISTERED NUMBER: 07968009)

ABRIDGED BALANCE SHEET

31 December 2019

	Notes	31/12/19 £	£	31/12/18 £	£
FIXED ASSETS					
Tangible assets	4		1,494		305
CURRENT ASSETS					
Debtors		57,273		9,697	
Cash at bank		<u>338,480</u>		<u>489,895</u>	
		395,753		499,592	
CREDITORS					
Amounts falling due within one year		<u>87,169</u>		<u>271,753</u>	
NET CURRENT ASSETS			308,584		227,839
TOTAL ASSETS LESS CURRENT LIABILITIES			310,078		228,144
RESERVES					
Income and expenditure account			<u>310,078</u>		<u>228,144</u>
			310,078		228,144

The financial statements have been prepared and delivered in accordance with the provisions applicable to companies subject to the small companies regime.

All the members have consented to the preparation of an abridged Income Statement and an abridged Balance Sheet for the year ended 31 December 2019 in accordance with Section 444(2A) of the Companies Act 2006.

In accordance with Section 444 of the Companies Act 2006, the Income Statement has not been delivered.

The financial statements were approved by the Board of Directors and authorised for issue on 30 June 2020 and were signed on its behalf by:

F Pluemacher - Director

The notes form part of these financial statements

Page 2

Documentary figure A27. Balance sheet for 2019. DOC-072, PDF p. 4. 31 December 2019. Complete balance-sheet page from the saved PDF. Full source.

A28. Balance sheet for 2020

BETTERCOAL (REGISTERED NUMBER: 07968009)

ABRIDGED BALANCE SHEET
31 December 2020

	Notes	31/12/20 £	£	31/12/19 £	£
FIXED ASSETS					
Tangible assets	4		2,023		1,494
CURRENT ASSETS					
Debtors		1,541		57,273	
Cash at bank		<u>247,423</u>		<u>338,480</u>	
		248,964		395,753	
CREDITORS					
Amounts falling due within one year		<u>9,895</u>		<u>87,169</u>	
NET CURRENT ASSETS			239,069		308,584
TOTAL ASSETS LESS CURRENT LIABILITIES			241,092		310,078
RESERVES					
Income and expenditure account			<u>241,092</u>		<u>310,078</u>
			241,092		310,078

The financial statements have been prepared and delivered in accordance with the provisions applicable to companies subject to the small companies regime.

All the members have consented to the preparation of an abridged Income Statement and an abridged Balance Sheet for the year ended 31 December 2020 in accordance with Section 444(2A) of the Companies Act 2006.

In accordance with Section 444 of the Companies Act 2006, the Income Statement has not been delivered.

The financial statements were approved by the Board of Directors and authorised for issue on 20 May 2021 and were signed on its behalf by:

F Pluemacher - Director

The notes form part of these financial statements

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Documentary figure A28. Balance sheet for 2020. DOC-073, PDF p. 4. 31 December 2020. Complete balance-sheet page from the saved PDF. Full source.

A29. Balance sheet for 2021

BETTERCOAL (REGISTERED NUMBER: 07968009)

ABRIDGED BALANCE SHEET
31 December 2021

	Notes	31/12/21 £	£	31/12/20 £	£
FIXED ASSETS					
Tangible assets	4		1,660		2,023
CURRENT ASSETS					
Debtors		399,107		1,541	
Cash at bank		<u>223,482</u>		<u>247,423</u>	
		622,589		248,964	
CREDITORS					
Amounts falling due within one year		<u>452,146</u>		<u>9,895</u>	
NET CURRENT ASSETS			170,443		239,069
TOTAL ASSETS LESS CURRENT LIABILITIES			172,103		241,092
RESERVES					
Income and expenditure account			<u>172,103</u>		<u>241,092</u>
			172,103		241,092

The financial statements have been prepared and delivered in accordance with the provisions applicable to companies subject to the small companies regime.

All the members have consented to the preparation of an abridged Income Statement and an abridged Balance Sheet for the year ended 31 December 2021 in accordance with Section 444(2A) of the Companies Act 2006.

In accordance with Section 444 of the Companies Act 2006, the Income Statement has not been delivered.

The financial statements were approved by the Board of Directors and authorised for issue on 8 July 2022 and were signed on its behalf by:

F Pluemacher - Director

The notes form part of these financial statements

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Documentary figure A29. Balance sheet for 2021. DOC-074, PDF p. 4. 31 December 2021. Complete balance-sheet page from the saved PDF. Full source.

A30. Balance sheet for 2022

BETTERCOAL (REGISTERED NUMBER: 07968009)

ABRIDGED BALANCE SHEET
31 December 2022

	Notes	31/12/22 £	£	31/12/21 £	£
FIXED ASSETS					
Tangible assets	4		1,574		1,660
CURRENT ASSETS					
Debtors		490,118		399,107	
Cash at bank		<u>295,022</u>		<u>223,482</u>	
		785,140		622,589	
CREDITORS					
Amounts falling due within one year		<u>550,620</u>		<u>452,146</u>	
NET CURRENT ASSETS			234,520		170,443
TOTAL ASSETS LESS CURRENT LIABILITIES			236,094		172,103
RESERVES					
Income and expenditure account			<u>236,094</u>		<u>172,103</u>
			236,094		172,103

The financial statements have been prepared and delivered in accordance with the provisions applicable to companies subject to the small companies regime.

All the members have consented to the preparation of an abridged Income Statement and an abridged Balance Sheet for the year ended 31 December 2022 in accordance with Section 444(2A) of the Companies Act 2006.

In accordance with Section 444 of the Companies Act 2006, the Income Statement has not been delivered.

The financial statements were approved by the Board of Directors and authorised for issue on 13 July 2023 and were signed on its behalf by:

F Pluemacher - Director

The notes form part of these financial statements

Page 2

Documentary figure A30. Balance sheet for 2022. DOC-075, PDF p. 4. 31 December 2022. Complete balance-sheet page from the saved PDF. Full source.

A31. Judgment concerning the Mikon III system in the decision of 2 April 2026

Вступившим в законную силу приговором Беловского городского суда Кемеровской области от 28.05.2024 по уголовному делу № главный инженер ООО «Шахта Листвяжная» ФИО20 признан виновным в совершении преступления, предусмотренного ч. 5 ст. [274.1 УК РФ](#).

В ходе судебного разбирательства по уголовному делу № установлено, что ФИО20 допустил нарушение правил эксплуатации автоматизированной системы управления АСУ АГК «Микон III», относящейся к критической информационной инфраструктуре Российской Федерации, повлекшее причинение вреда этой критической информационной инфраструктуре Российской Федерации, а также тяжкие последствия в виде аварии на опасном производственном объекте и крупного материального ущерба ООО «Шахта «Листвяжная» организованной группой, с использованием своего служебного положения.

Image of an excerpt from the saved web page; highlighting added by the editors. DOC-084. Decision date: 02.04.2026; reasoning section. Full court decision. Unboxed image supplied in public-sources/DOC-084-court-original.png.

Kemerovo Regional Court cites the final judgment of Belovo City Court dated 28.05.2024: the chief engineer was found guilty under part 5 of article 274.1 of the Russian Criminal Code. The next paragraph describes breaches of operating rules for the Mikon III system and consequences established in the criminal case. The image contains these two paragraphs, without family or financial details of the civil dispute.

Card CLM-052: complete selected excerpt and analysis.

A32. The same criminal case in the decision of 26 March 2026

Вступившим в законную силу приговором Беловского городского суда Кемеровской области от ДД.ММ.ГГГГ по уголовному делу № <данные изъяты> ООО «Шахта Листвяжная» ФИО22 признан виновным в совершении преступления, предусмотренного ч. 5 ст. 274.1 УК РФ (л.д. 194-215 т.1).

В ходе рассмотрения уголовного дела № судом установлено, что ФИО22 допустил нарушение правил эксплуатации автоматизированной системы управления АСУ АГК «Микон III», относящейся к критической информационной инфраструктуре Российской Федерации, повлекшее причинение вреда этой критической информационной инфраструктуре Российской Федерации, а также тяжкие последствия в виде аварии на опасном производственном объекте и крупного материального ущерба ООО «Шахта «Листвяжная» организованной группой, с использованием своего служебного положения.

Image of an excerpt from the saved web page; highlighting added by the editors. DOC-085. Decision date: 26.03.2026; reasoning section. Full court decision. Unboxed image supplied in public-sources/DOC-085-court-original.png.

In another civil case, the regional court also recounts the criminal episode involving breaches of the Mikon III operating rules. This is a judicial account of the same episode, rather than a second independent technical investigation into the accident's causes. Anonymous identifiers are retained as in the court publication; they require no translation.

Card CLM-052: complete selected excerpt and analysis.

Appendix B. Natalia's questions for the picket

Tomorrow, 29 October 2026, I am going to hold a one-person picket outside Uniper in Düsseldorf. I want a meeting and a substantive conversation. Below are the questions I intend to ask. Today, I do not yet know whether company representatives will come out to speak to me, whether a meeting will take place or whether I will receive answers.

The visit to Kiselyovsk and conversations with residents

1. Did Uniper representatives visit Kiselyovsk in September 2019 as part of the Bettercoal delegation? Who exactly took part in the visit?
2. Who organised the visit to the town, drew up the itinerary and accompanied your delegation?
3. Did you meet residents of Kiselyovsk? If so, whom did you meet, who selected the interviewees, and what problems did they raise? If not, why not?
4. Could residents speak to you without representatives of coal companies or the local administration present?
5. Before the visit, were you aware of the appeal by Kiselyovsk residents to the Prime Minister of Canada dated 8 June 2019? Had you seen material published by Novosti Kiselyovska?
6. What material did you receive from Ecodefense before the visit? Did it include any of my articles or videos, or information about my work?
7. Was the possibility of meeting me, Natalia Zubkova, discussed? If so, what decision was made, and why did the meeting not take place?
8. In your article, you described how close mining operations were to residential homes. What conclusions did you draw about the consequences for residents, including children?

Assessments of operations, violations and verification

9. Listvyazhnaya was among the sites included in Bettercoal's 2017 site assessment. What deficiencies were identified at this particular mine, and what measures were included in the improvement plan?
10. How did Bettercoal check that these measures were implemented before the disaster of 25 November 2021? When was the last check, what did it find, and to whom were the results reported?
11. Did Bettercoal receive information about industrial safety violations at Listvyazhnaya in 2021? If so, how did it respond? If not, how was the assessment of such risks organised?
12. After the disaster, Bettercoal announced its intention to establish the causes and the preventive measures required. What were the results of this work? Where can the findings and decisions be consulted?

13. What specific requirements did you impose on suppliers after the visit? What did they have to change, by when, and who checked implementation?

Coal purchases

14. Why did Uniper continue buying Russian coal after visiting Kiselyovsk? How did what you saw affect purchasing decisions?
15. From which Russian producers and operations did you buy coal in 2019–2022? Can you provide information on the volumes and origins of supplies?

Persecution of journalists and activists

16. The TDI report for Bettercoal's working group discusses intimidation of environmental activists by coal companies. How did you respond to this information?
17. What measures did you put in place to enable residents and journalists to report violations to you without fear of persecution?
18. When did you learn of the threats and attacks against me? Did you consider the 2021 reports by CPJ and Reporters Without Borders? What action did you take?

Results, executives' decisions and a meeting

19. What specific changes for Kiselyovsk residents resulted from your visit and subsequent work? Can you identify projects and time frames and show documents confirming their implementation?
20. Frank Plümacher, how does your experience as Bettercoal Chair inform your current work as Uniper's Human Rights Officer? How do you assess the results of this work for residents of Russia's coal-mining regions?
21. Nadja Wendler, what action are you prepared to take as Uniper's sustainability executive and a member of RECOSI's Board of Directors to ensure substantive answers to these questions?
22. Are you prepared to meet me, listen to my story and provide written answers supported by documents?

But the most important question for me concerns my own life.

What did I do that was wrong back in Kiselyovsk, when I reported on black snow and on how people live beside coal operations? And what am I doing wrong here in Germany that means I have to live in these conditions?

I want you to listen to my story. What would you do in my place? How would you build your life from here and secure your child's future?

Appendix C. How to verify and reproduce the results

Shared primary-source archive: Bettercoal_Uniper_Research_RU_V03_sources.zip. This unchanged evidence corpus serves both language editions. Original filenames, Russian research metadata, public-sources, source-transfer.json and SHA256SUMS.txt are retained. It is not the editable source of EN_V04.

English-edition source archive: Bettercoal_Uniper_Research_EN_V04_sources.zip. It contains Bettercoal_Uniper_Research_EN_V04.html, editable English SVGs in visuals, CSV tables in datasets, claims-en.json, evidence-register-en.json, quote-language-review.json, production scripts and SHA256SUMS.txt. The HTML embeds all fonts and documentary images.

The delivery manifest SHA256SUMS_EN_V04.txt lists the PDF, English HTML, both archives and the change list with their checksums. No new public download URL is stated.

Reproducing EN_V04. Extract the English archive separately. Verify it with Verify-SHA256.ps1 or the Node verifier before editing. The HTML is the master: changes to SVG/CSV exports must also be made in their inline HTML counterparts. Follow README_EN.txt for scripts and dependencies. After rebuilding, update contents page numbers and verify DOC/CLM links.

Checking primary sources. Extract the shared archive separately. Verify public-sources against SHA256SUMS.txt and source-transfer.json. It contains supplied primary documents, redacted pages and labelled extracts; complete private documents are excluded. Its data.mjs, claims.json, evidence-register.json and content metadata describe Russian V03, not the editable English edition.

Checking numbers: each producer's three statuses must sum to its item total; the four plans total 210. Financial values are checked against page 4 of each balance sheet. Purchasing shares are checked against the category and footnote, not just the figure. Bar scales start at zero. A missing value is not replaced with zero.

Checking a claim: find its CLM in the correspondence table, open the card, then the DOC and specified page. For a court decision's date, use its internal heading. To match an operation, check the legal entity and type of work suspended. Establishing knowledge requires an incoming document with a receipt date.

SHA-256 verifies file integrity. source-transfer.json identifies the evidence files; the English manifest lists EN_V04 sources. Editing or re-exporting changes hashes: preserve earlier versions and regenerate the manifest. Rebuilding the English PDF leaves primary documents unchanged. External-address results are those recorded in the underlying research; they were not rechecked for EN_V04.

Appendix D. Availability of external addresses

Checks were conducted on 28 October 2026. The list records automated-request results, rather than proof that a publication was removed. HTTP 403, 429 and browser checks may indicate restrictions on automated access. The complete log, including accessible addresses and redirects, is included in the sources package. Saved copies are listed in the register.

DOC-002 — HTTP 403 / browser check. https://www.uniper.energy/sites/default/files/2022-03/Bettercoal-in-Kuzbass_Public-Report.pdf

DOC-003 — HTTP 403 / browser check. https://www.uniper.energy/sites/default/files/2022-03/uniper_sustainability_report_2019_en.pdf

DOC-006 — HTTP 503. https://www.annualreports.com/HostedData/AnnualReportArchive/u/uniper-se_2022.pdf

DOC-007 — HTTP 403 / browser check. <https://www.consilium.europa.eu/en/press/press-releases/2022/04/08/eu-adopts-fifth-round-of-sanctions-against-russia-over-its-military-aggression-against-ukraine/>

DOC-012 — HTTP 200 / browser check. <https://www.bettercoal.org/bettercoal-producers>

DOC-011 — HTTP 200 / browser check. <https://www.bettercoal.org/siberian-business-union-coal>

DOC-010 — HTTP 200 / browser check. <https://www.bettercoal.org/kuzbassrazrezugol-coal-ojsc>

DOC-015 — HTTP 403 / browser check. <https://www.uniper.energy/sustainability/people-and-society/social-responsibility>

DOC-016 — HTTP 200 / browser check. <https://www.bettercoal.org/governance>

DOC-019 — HTTP 403 / browser check. https://www.uniper.energy/sites/default/files/2022-03/Gegenantraege_HV_2021.pdf

DOC-017 — HTTP 200 / browser check. <https://www.bettercoal.org/news/bettercoal-publishes-its-annual-report-2018>

DOC-018 — HTTP 200 / browser check. <https://www.bettercoal.org/news/bettercoal-announces-appointment-of-new-executive-director-2>

DOC-024 — HTTP 200 / browser check. <https://www.bettercoal.org/news/accident-at-sds-ugol-mine>

DOC-031 — HTTP 403 / browser check. <https://www.uniper.energy/news/update-on-unipers-russian-activities-and-way-forward>

DOC-046 — HTTP 200 / browser check. <https://www.bettercoal.org/ktk>

DOC-047 — HTTP 200 / browser check. <https://www.bettercoal.org/taltekt-open-pit-mine-ltd>

DOC-051 — HTTP 200 / browser check. <https://www.bettercoal.org/taldinskaya-mining-company-llc>

DOC-050 — HTTP 200 / browser check. <https://www.bettercoal.org/suek-jsc>

DOC-059 — HTTP 200 / browser check. <https://www.bettercoal.org/news/jsc-shubarkol-komir-is-no-longer-a-bettercoal-supplier>

DOC-077 — HTTP 403 / browser check. <https://www.volza.com/company-profile/uniper-global-commodities-se-451916/import/suppliers/>

DOC-078 — HTTP 403 / browser check. https://www.uniper.energy/system/files/2024-04/uniper_group_sustainability_report_2017.pdf

DOC-082 — HTTP 403 / browser check. <https://www.uniper.energy/sustainability/sustainability-resources>

DOC-079 — HTTP 200 / browser check. <https://www.bettercoal.org/news/bettercoal-suspends-activities-in-russia-with-immediate-effect>

Additional link — No response: host name did not resolve. <https://cr.uniper.energy/the-dilemma-of-investing-in-social-and-environmental-remediation-activities/>

Additional link — HTTP 403 / browser check. <https://www.uniper.energy/sustainability/dilemma-investing-social-and-environmental-remediation-activities>

DOC-042 — No response: request timed out.

https://www.lawtek.ru/news/119276/sud_po_trebovaniyu_rostekhnadzora_priostanovil_vedeniye_gornykh_rabot_v_opasnoy_zone_ooo_razrez_taltek