



HUMAN RIGHTS REPORT

NORILSK NICKEL GROUP'S 2023



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INTRODUCTION

About Norilsk Nickel Group

Norilsk Nickel Group ("Nornickel", "Nornickel Group", the "Group" or the "Company")¹ is a leader of the Russian metals and mining industry, ranks No. 1 among the world's producers of palladium and nickel, and is one of the major producers of platinum, copper, cobalt and other metals globally. We are a vertically integrated holding group boasting a full production cycle, from ore mining

to refining, along with our own energy, transportation and support assets, as well as R&D capabilities.

Norilsk Nickel Group's Human Rights (the "Report") covers MMC Norilsk Nickel and its subsidiaries, including Russian companies of Norilsk, Kola, Trans-Baikal, Energy and Sales divisions, as well as other Group assets.

Our production facilities are located on the Taimyr Peninsula and in the Murmansk Region and Trans-Baikal Territory. The production processes of each division are described in more detail in Nornickel's [2023 Annual Report](#) and [Sustainability Report](#), as well as in related sections on the Company's official website.

About the Report

The Company plays an important role in the social and economic development of the regions where it operates, with its assets forming the backbone of local economies. Nornickel is a major employer (with the average headcount of 80,562 people in 2023) and is therefore bound to impact human rights across its footprint.

the Company's robust development, smooth operations, and implementation of large-scale projects. We value and respect the rights of our employees and all those involved in our operations.

The 2023 Human Rights Report is the second report of its kind in Nornickel's history. It complements the Company's [2023 Sustainability Report](#), outlines our human rights activities and shows how they are integrated into our business processes and broader sustainability initiatives.

The Report provides information on the Group's compliance with key international human rights standards: UN Guiding Principles on Business and Human Rights (UNGPs) and the Corporate Human Rights Benchmark (CHRB).

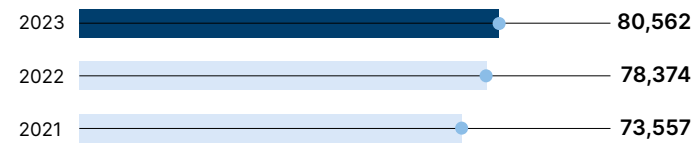
People are our key asset, which has been gaining in value in these days. It is our employees that work in the harsh Arctic environment to ensure

¹ Norilsk Nickel Group includes MMC Norilsk Nickel and its subsidiaries.

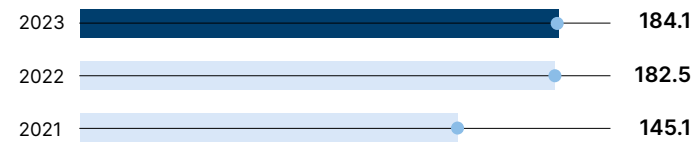


KEY HIGHLIGHTS

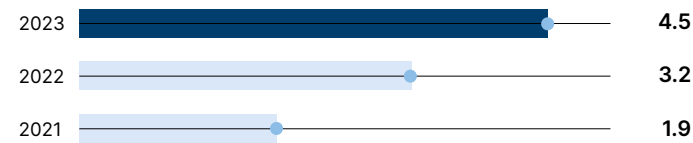
Nornickel Group's average headcount employees



Average monthly salary, group-wide RUB '000.



Spending on improvements in social and working conditions RUB bn



>67 thousand employees work beyond the Arctic Circle

In 2023, our average monthly salary was

2.5 times higher than Russia's average

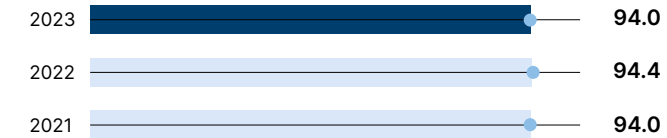
Throughout its duration from 2003 to 2023, the programme to improve social and working conditions saw

RUB 15.7 bn in investments, with overhauls carried out at 138 facilities in 2023



Freedom of association

Employees covered by collective bargaining agreements %

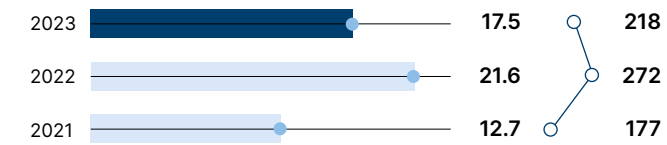


Respect for basic human rights

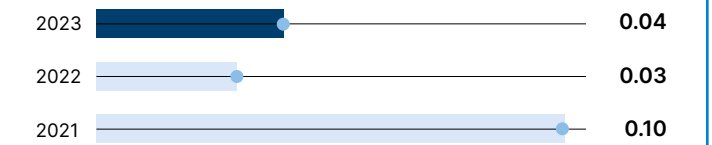
0 cases of forced, compulsory or child labour

Occupational health and safety

Health and safety expenses RUB bn



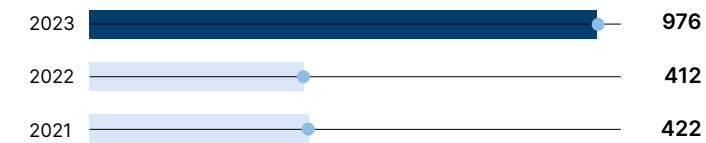
FIFR



Expenses per employee, RUB '000

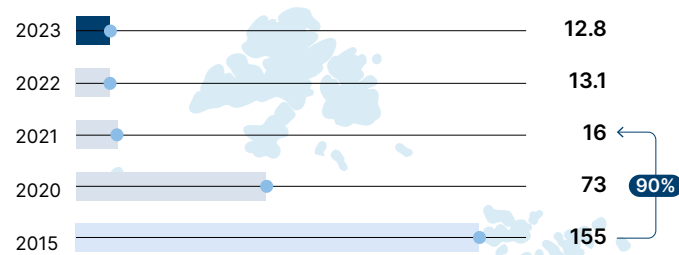
Indigenous peoples

Funding allocated to support indigenous peoples RUB mln



7 indigenous northern peoples (Sámi, Dolgan, Nenets, Enets, Nganasan, Evenk and Komi) reside in Nornickel's regions of operation

Environment

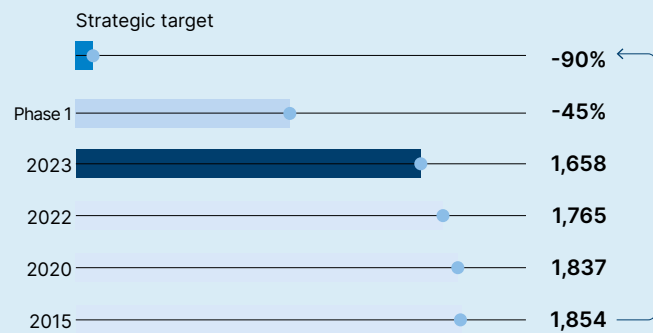


> 90%
reduction in SO₂ emissions vs the 2015 base



Kola Division

Norilsk Division



11%
reduction in SO₂ emissions vs the 2015 base

In October 2023, Nadezhda Metallurgical Plant launched comprehensive testing of the first line of sulphur dioxide recovery from off-gases generated by its flash smelters

COMMITMENT TO HUMAN RIGHTS

UNGPs RF A1.1

Statement of the Chairman of the Board of Directors

As enshrined by the Board of Directors in its strategic documents, Nornickel's key priorities are to ensure fair, comfortable and safe working conditions for our employees and to conserve and restore the environment for those residing in the regions where we operate.

Decent salaries, comfortable living conditions and self-fulfilment opportunities are key to making our Company sustainable going forward. Investing in human capital means investing in Nornickel's future.

Nornickel wholeheartedly respects human rights and freedoms in line with internationally recognised standards, specifically the UN Guiding Principles on Business and Human Rights, and consistently adopts best practices in its daily routines. These activities are directly supervised by relevant committees of the Board of Directors.

We believe that everyone is entitled to dignity, freedom and equal treatment regardless of race, gender, nationality, religion or social status. However, our focus is not limited to our own employees and immediate neighbours in the regions where we operate. We partner with indigenous peoples of the Taimyr and Kola peninsulas to preserve their culture and way of living as true custodians of the traditions of the Russian North. On top of that, we monitor our counterparties' human rights compliance and build our supply chain in a responsible and ethical manner.



Andrey Bougrov,
Chairman of the Board of Directors

UNGPs RF A1.3

Our human rights activities are guided by Russian laws and international regulations, as well as best corporate

practices. Since 2022, Nornickel has been developing its Human Rights Due Diligence System.

For more details, please see the [Human Rights Due Diligence Procedure section](#).

At Nornickel, we are aware of our responsibility for creating a fair and safe environment for all those involved in our operations. Respect for human rights is not only an ethical obligation, but also a key factor of sustainable business development.

Nornickel stance

CHRB A.1.3.b

The Company does not tolerate any forms of discrimination and does not use forced or child labour, giving every employee an equal opportunity to

exercise their labour rights regardless of gender, race, nationality, origin, financial, social, and occupational status, age, domicile, religion, political beliefs, and other circumstances not related to professional qualities.

No operations are run in, and no raw materials are procured from, conflict-affected and high-risk areas. Nornickel expects its suppliers and contractors to respect human rights throughout their operations¹.

Key human rights initiatives and declarations guiding Nornickel activities

Generally recognised international and Russian declarations, guidelines and initiatives

- Universal Declaration of Human Rights
- UN Global Compact
- ILO Declaration on Fundamental Principles and Rights at Work
- International Labour Organisation conventions
- OECD Guidelines for Multinational Enterprises
- Social Charter of the Russian Business

Russian laws and regulations

- Constitution of the Russian Federation
- Labour Code of the Russian Federation
- Federal Law No. 82-FZ On the Minimum Wage dated 19 June 2000, Federal Law No. 82-FZ On Safeguarding the Rights of Indigenous Minorities of the Russian Federation dated 30 April 1999, and other applicable federal laws

Practical recommendations

- UN Guiding Principles on Business and Human Rights (UNGPs)
- Guide for Integrating Human Rights into Business Management (UN Global Compact)
- International Financial Corporation's (IFC) Performance Standards on Environmental and Social Sustainability
- Voluntary Principles on Security and Human Rights (VPSHR)
- GRI Standards

Industry-specific initiatives

- Initiative for Responsible Mining Assurance (IRMA)
- ICMM Mining Principles

List of human rights priorities

UNGPs RF A1.2, UNGPs RF A2.2, UNGPs RF B1, UNGPs RF B2

Based on the applicable international standards and industry practices and the nature of our operations, we determined

the list of human rights to be prioritised. Human rights are to be maintained by employees, local communities, and

suppliers. For more details, please see the [Nornickel's Human Rights Achievements in 2023 section](#).

Types of human rights prioritised by Nornickel

Stakeholders	Employees	Local communities	Suppliers
List of human rights priorities by category	<p>Fundamental rights:</p> <ul style="list-style-type: none"> • Right to life • Right to freedom • Right to privacy and security of the person • Right to freedom of movement • Right to a healthy environment 	<p>Labour rights:</p> <ul style="list-style-type: none"> • Right to work • Right to fair and decent remuneration • Right to fair and favourable working conditions • Right to social security • Right to a reasonable work schedule • Right to regular paid leaves • Ban on forced labour <p>Right to safety, including occupational health and safety</p> <p>Freedom of association and collective bargaining</p> <p>Right to the protection of family, maternity and childhood</p> <p>Rights of employees and external stakeholders to a healthy environment</p>	<p>Requirements for suppliers to respect human rights as part of supply chain responsibility commitments</p>

¹ For more details, please see [the Responsible Supply Chain Report](#).

Human Rights Policy and Business Ethics Code

CHRB A.1.1, CHRB A.1.2.a, CHRB A.1.2.b, UNGPs RF A2.4, UNGPs RF C1.1

Nornickel's human rights activities are governed by the Company's by-laws, specifically by the Human Rights Policy.

Human Rights Policy

In 2021, MMC Norilsk Nickel's Human Rights Policy was updated and approved by the Company's Board of Directors.

Purpose of the Policy — prevent and minimise human rights violations across the Group and its supply chain.

Scope of the Policy: communicated to all stakeholders and applicable to all of the Company's production processes, including exploration, mining, smelting, refining, manufacturing of finished goods, marketing, sales and transportation of non-ferrous and precious metals.

Key terms of the Policy



The Group is committed to the principles and requirements of the Universal Declaration of Human Rights, UN declarations, ILO conventions, UN Sustainable Development Goals, International Financial Corporation's

Performance Standards on Environmental and Social Sustainability, UN Guiding Principles on Business and Human Rights (UNGPs), OECD Guidance, GRI Standards, Voluntary Principles on Security and Human Rights (VPSHR).

Nornickel's stakeholder engagement is aligned with ISO 26000:2010 and AA1000SES (2015) standards.

MMC Norilsk Nickel's Human Rights Policy is supported by the following codes, programmes and policies that cover a wide range of stakeholder rights:

- Business Ethics Code;
- Equal Opportunities Programme;
- Working Conditions Policy;
- Freedom of Association Policy;
- Community Engagement Policy;
- Indigenous Peoples' Rights Policy¹.

Business Ethics Code

MMC Norilsk Nickel's Business Ethics Code describes ethical principles, business values and professional standards binding on all Nornickel's employees, and specifies the Company's social commitments. It also describes and explains our values.

To help Nornickel's employees better understand the Code provisions, the Company developed a White Paper dedicated to key messages and values and what makes and keeps our team united.

Our values



In 2023, Nornickel conducted an internal group-wide survey to analyse the current state and changes in its corporate culture, as well as the progress made as part of measures to develop it in 2016–2023, with the following findings:

- the overall corporate culture assessment indicates its strengthening and homogeneity;

- the Company's actions have become more concerted and adapted to external changes and challenges;
- the Company's social engagement and focus on ensuring safety, fostering collaboration and encouraging innovation plays an important role in our corporate culture;
- employee engagement, vertical communications and the dialogue are all on the rise;

- care for people, collaboration, efficiency, safety, progress, initiative become prioritised.

Driven by changing environment and business priorities, including generational shift, we need to rethink our philosophy and elements of our corporate culture.

¹ Through the Company's official website, Nornickel's by-laws are made available to a wide range of stakeholders at <https://nornickel.com/investors/disclosure/corporate-documents/>.

Sustainable Social Development Strategy through 2030

In 2023, in line with the principles set out in its Human Rights Policy and Business Ethics Code, Nor Nickel's Board of Directors approved the Sustainable Social Development Strategy through 2030 (the "Strategy"). It centres around four strategic priorities:

- health and safety;

- talent management and corporate culture;
- development of technologies and products that help foster technological and social progress;
- involvement in the lives of local communities and society at large.

Respect for human rights is a basic principle that underlies our efforts when achieving the Strategy goals.

Strategy goals¹



Achieving zero fatalities and reducing workplace injuries and occupational diseases



Attracting young talent and experienced professionals and reducing employee turnover



Aligning working conditions with the needs of our staff



Minimising social risks in the Company's operations



Fostering sustainable social and economic development across the Company's footprint



Contributing to the well-being of society at large nationally and internationally



Developing technologies and products that help foster technological and social progress



Governance structure, responsibilities and oversight of human rights

CHRB A.2.4

Nornickel's governance structure makes sure that human rights concerns remain addressed by the management. Information on corporate risks related to human rights violations is included in our annual reports to be monitored by the Board of Directors and the Management Board of MMC Norilsk Nickel.

Two committees of the Company's Board of Directors are empowered to follow up on the Sustainable Social Development Strategy through 2030 and the Human Rights Policy. The Sustainable Development and Climate

Change Committee reviews draft policies, standards and initiatives aimed at effective and efficient implementation of human rights principles. The Audit Committee reviews reporting on complaints received through the Corporate Trust Line.

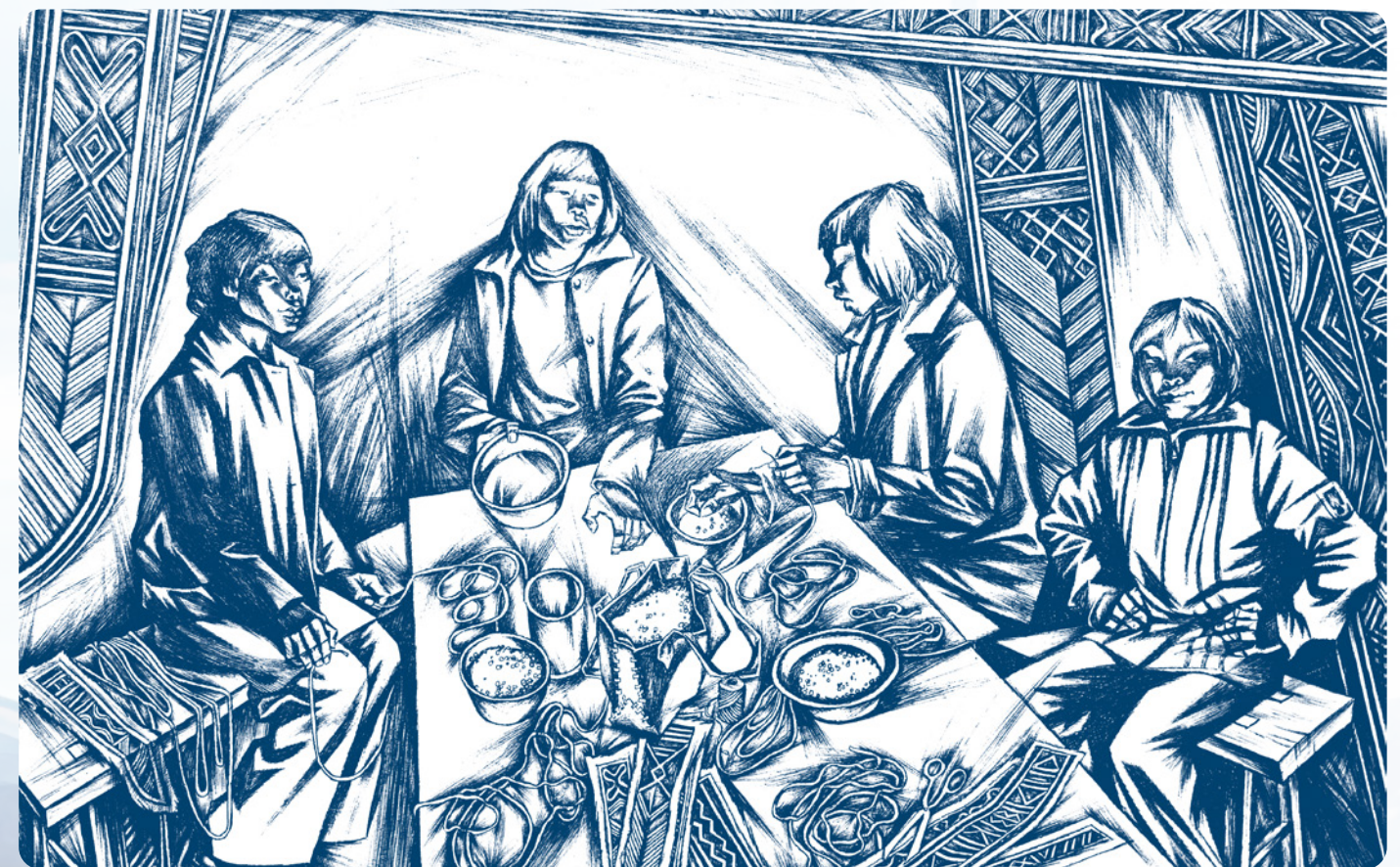
CHRB A.2.3, B.1.2

To make the top management committed to human rights protection, health and safety indicators were included in the annual team KPIs (with a relative weight of 25 to 30%), which tracks the overall performance under an action plan aimed

at eliminating fatalities in the Company's operations, subject to the application of a FIFR-linked zero (malus) factor. Protecting the right to life and safe work is an absolute priority for Nornickel.

Other employee incentives related to meeting the Company's human rights obligations or targets include rewards payable from 2023 onward for any workplace risks identified.

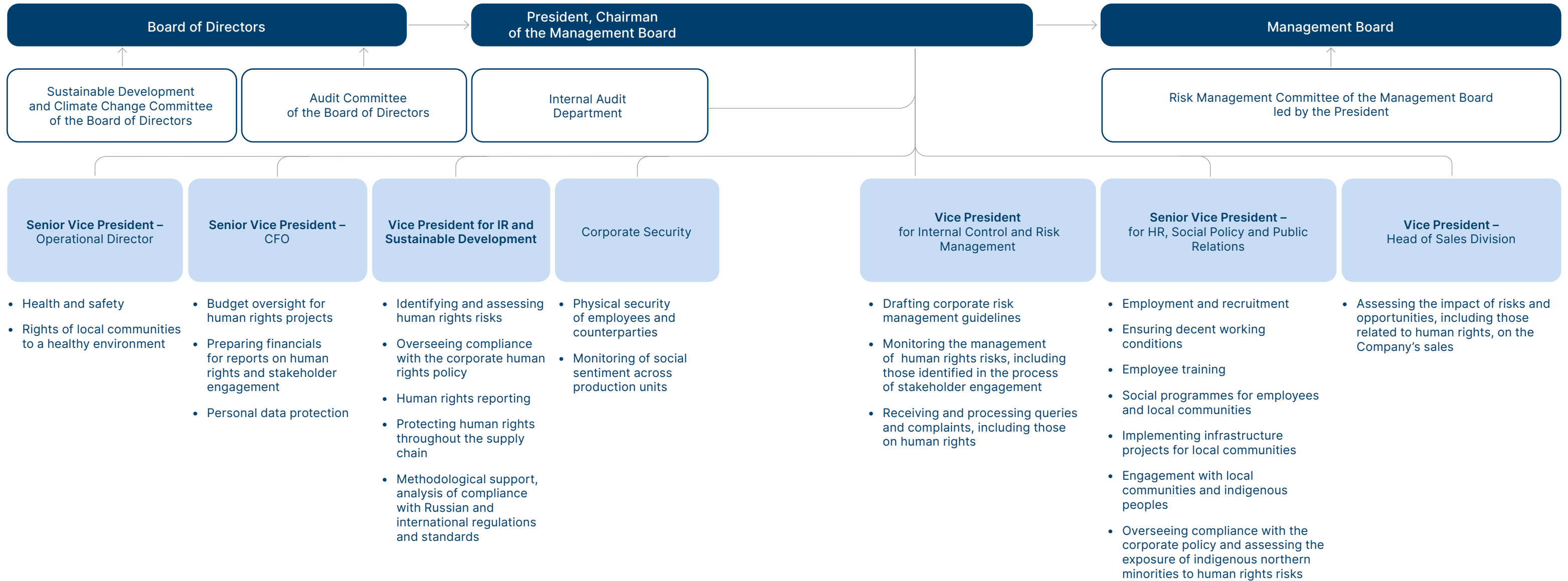
➔ For more details, please see the [Identification and Assessment of Human Rights Risks and Impacts section](#).



¹ For the full list of goals outlined in the Company's Sustainable Social Development Strategy, see [the 2023 Sustainability Report](#).

Governance structure, responsibilities and oversight of human rights¹

CHRB A.2.1, CHRB A.2.2, CHRB B.1.1

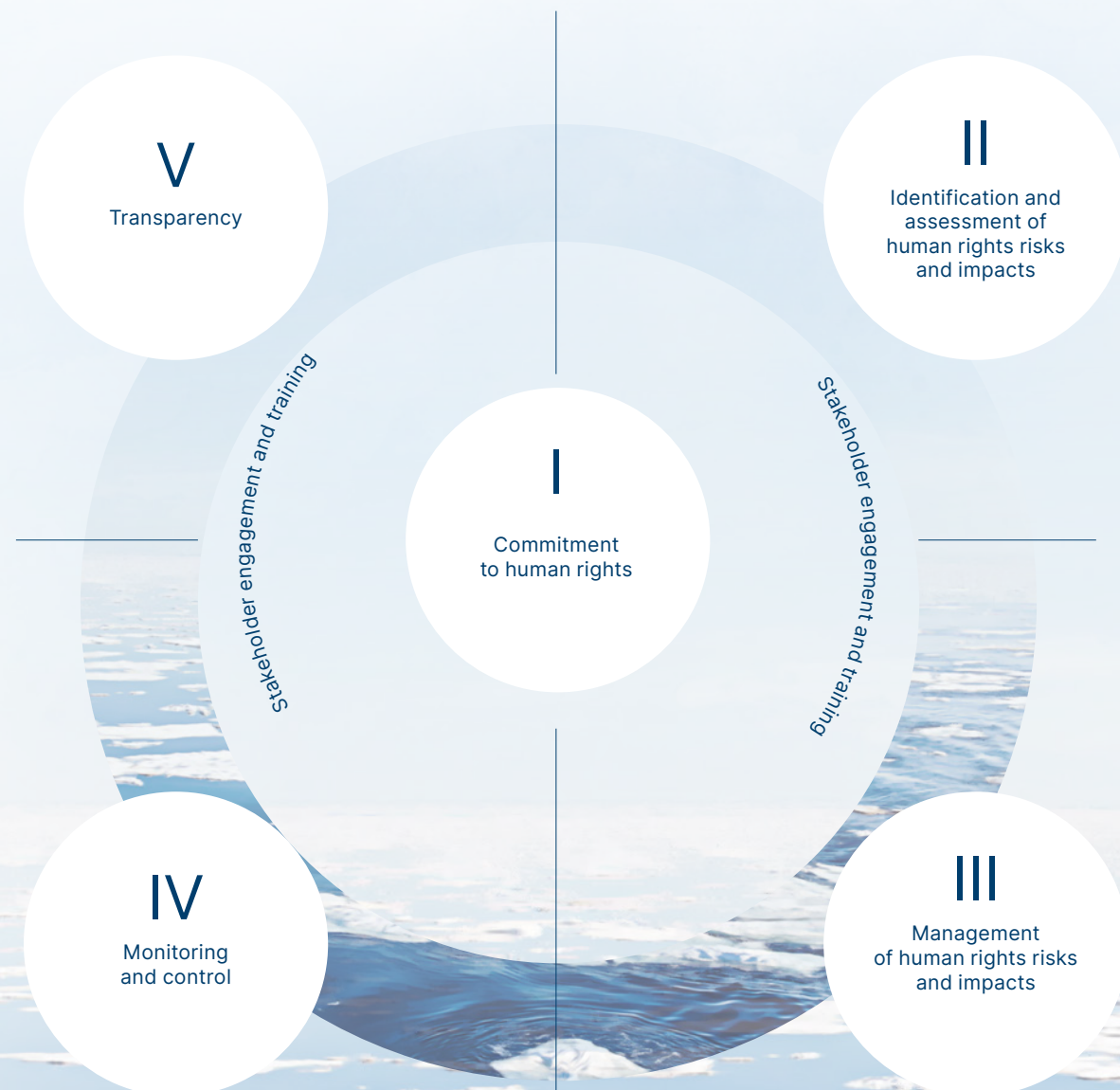


¹ For the key functional responsibilities at different governance levels, please see the Human Rights Policy available on the Company's official website at https://www.nornickel.com/upload/iblock/df8/PJSC_MMC_Norilsk_Nickel_Human_Rights_Policy.pdf.

HUMAN RIGHTS DUE DILIGENCE PROCEDURE

Since 2022, Nornickel has been developing the Human Rights Due Diligence System based on the UN Guiding Principles on Business and Human Rights (UNGPs).

Commitment to human rights



The system includes a set of initiatives for identifying, assessing, managing, and monitoring risks of human rights violations in order to prevent, mitigate, and eliminate any negative impacts on human rights.

Stakeholder engagement and training on protection of human rights are also an integral part of the system.

In 2023, the following initiatives were implemented to improve the Human Rights Due Diligence System:

- identifying risks of human rights violations based on complaints and reports received by the Corporate Trust Line;
- assessing risks of human rights violations with a breakdown by the Group key production facilities;
- analysing the outcomes of the large-scale engagement survey named "Let Everyone Be Heard. What Do You Think?" and discussing them with focus groups in order to develop

communication plans to increase employee loyalty and satisfaction by addressing their salient concerns (remuneration, bonuses, safety culture, etc.);

- monitoring the efficiency of ongoing measures to manage risks of human rights violations across individual production facilities of the Group.

In 2024, the Company plans to further develop the Human Rights Due Diligence System for Nornickel's business and functional units in Russia.

Identification and assessment of human rights risks and impacts

CHRB B.1.3

In 2023, Nornickel continued identifying and assessing risks and impacts on human rights. Following a preliminary assessment completed in 2022,¹ the Company conducted an in-depth

analysis of human rights risks and impacts based on complaints and reports received by the Corporate Trust Line. For the purposes of the assessment, the Company used the methodology of the Danish Institute for Human Rights (as recommended by IRMA).²

The general approach to identifying risks involved analysing complaints and reports received, classifying these by topic, and pinpointing rights violated.

¹ For more details on the preliminary assessment conducted in 2022, please see [Norilsk Nickel Group's 2022 Human Rights Report](#).

² For more details on the Danish Institute for Human Rights, please see the its official website at <https://www.humanrights.dk/>.

Approach to identifying risks of human rights violations



In 2023, to standardise the approach to analysing complaints and reports, the Company developed guidelines for a classifier to identify risks of human rights violations, including a description of human rights and, for each right, a list of categories and subcategories of events involving human rights violations. The incoming information is used for identifying, assessing and mitigating human rights risks.

CHRB B.2.1, B.2.2

The analysis helped map out and prioritise human rights within the Group¹ with a breakdown by operations, including the right to health, safe working conditions, protection from forced labour, and fair and decent remuneration.

Human rights risks in the mineral supply chain are identified through supplier due diligence as part of the Group's mineral

supply chain due diligence management system. In the reporting period, due diligence identified no risks. For a detailed description of Nornickel's approach to building a responsible supply chain, please see the [Responsible Supply Chain Report](#).

The list of the Company's key risks includes human rights risks. To mitigate these, Nornickel continuously monitors and controls observance of human rights at every stage of its operations.

Human rights risks embedded in the corporate risk management framework

Right	Related risks	Assessment of potential impact on the Company's goals
Employee right to safety, including occupational health and safety	Group fatality	Extremely high
	Strained social and labour relations	Medium
Requirements for suppliers to respect human rights as part of supply chain responsibility commitments	Failure to comply with the requirements put forward by leading ESG standards and associations	High
Rights of employees and external stakeholders to a healthy environment	Environmental damage caused by emergencies	Extremely high
Rights of local and indigenous communities	Risk of adverse impacts on the rights of local and indigenous communities	Low

¹ Nornickel employees.

The Company assesses risks and impacts of human rights violations, monitors and controls observance of human rights based on the following guidelines and best practices:

- UN Guiding Principles on Business and Human Rights, 2011;¹

- The Corporate Responsibility to Respect Human Rights: An Interpretive Guide, UNDP, 2012;²
- Human Rights Impact Assessment Guidance and Toolbox, Danish Institute for Human Rights, 2020.³

➔ For more details on the Company's risk management framework, please see [Nornickel's 2023 Sustainability Report \(Internal Control and Risk Management section\)](#).

Safety culture transformation project

Since 2022, the Company's employees have been involved in identifying risks associated with occupational

health and safety. In 2023, Nornickel implemented a unified incentive

system for identifying such risks, depending on employee involvement in risk management:

RUB 5,000
for identifying a risk and reporting it to their line manager

RUB 7,500
for developing a proposal on risk minimisation

RUB 10,000
for taking part in the proposal implementation

In the reporting year, 455 employees received cash rewards totalling

RUB 3.4 mln



¹ https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciplesbusinesshr_en.pdf.

² [The Corporate Responsibility to Respect Human Rights | United Nations iLibrary \(un-ilibrary.org\)](#).

³ https://www.humanrights.dk/sites/humanrights.dk/files/media/document/DIHR%20HRIA%20Toolbox_Welcome_and_Introduction_ENG_2020.pdf.

Management of human rights risks

CHRB B.2.3, UNGPs RF C4.1, 4.2

Integrated into all of Nornickel's business processes, its unified Corporate Risk Management Framework enables risk-oriented decision-making at various levels to achieve strategic and operational goals.

The Risk Management Service plays a crucial role in providing efficient guidance on integrating risk management into business processes, while risk owners are responsible for risk management.

The Risk Management Framework includes the Board of Directors, the Audit Committee of the Board of Directors, the Management Board

and the Risk Management Committee of the Management Board. It offers a conceptual, regulatory and methodological framework, organisational tools and information infrastructure to manage Nornickel's risks through an automated GRC (Governance, Risk and Compliance) system.

The Risk Management Framework also includes the Internal Audit Department, which annually assesses efficiency of risk management, and an internal control function, which provides guidance and participates in risk assessment of business processes.

The Company employs a consistent and holistic risk management approach which enables risk owners to identify, analyse, assess and rank risks in business units, develop and implement risk response plans, deliver on action plans to mitigate risks to an acceptable level (including mitigation in line with the Company's risk appetite metrics), prepare risk reports, and monitor changes.

For more details on initiatives aimed at risk mitigation and positive impact enhancement, please see the [Nornickel's Human Rights Achievements in 2023](#) section.

Monitoring and control of human rights risks

CHRB B.2.4

To monitor and control human rights risks, the Company reviews and analyses reports of the Corporate Trust Line and the grievance mechanism.

➔ [For more details, please see the Remedies and Grievance Mechanisms section.](#)

In addition, Nornickel regularly runs an engagement survey called "Let Everyone Be Heard. What Do You Think?" in the form of questionnaire. In 2023, the survey involved 57,145 employees, up 13% y-o-y. The engagement index at Nornickel amounted to 68% (up by 5 p.p. y-o-y).

Based on the results of the survey, the Company organises discussions and studies stakeholder opinions in focus groups. The insights gathered from the focus groups are then incorporated into communication campaigns and initiatives to improve employee engagement.

In 2023, a distinct focus was placed on studying engagement indices for occupational health and safety and human rights. This involved selecting and analysing questions from the questionnaire on these aspects.

The analysis revealed the aspects of human rights protection which are valued the most by Nornickel employees. These include a sense of social security due to the extensive benefits package, mutual respect within teams, workplace safety, and the freedom to openly discuss occupational safety risks.

63%
Human rights engagement index

66%
Health and safety engagement index

TRAINING AT NORNICHEL

CHRB B.1.5

Nornickel is building a training ecosystem based on the principles of relevance, accessibility, and innovation, which involves flexible, personalised training throughout the entire employee employment cycle.

The Company is committed to making sure employees can exercise their right to education and implements the Training Strategy for 2022–2025. For more details on the Training Strategy, please see the [2023 Sustainability Report](#).



Nornickel employees believe that the Company helps them determine areas for further training and development. Over the last seven years, satisfaction with this aspect has increased

by **24 p. p.**

rising from 33 to 57%.

Based on our "Let Everyone Be Heard. What Do You Think?" survey in 2018–2024



Human rights training

Employee training is a cross-cutting element of the human rights due diligence procedure and an important tool for building professional competencies of employees.

Human rights are integrated into training programmes on critical competencies, such as digital skills, occupational health and safety (OHS), sustainable development (ESG). In 2023, the share of training on critical competencies accounted for 50% of the overall

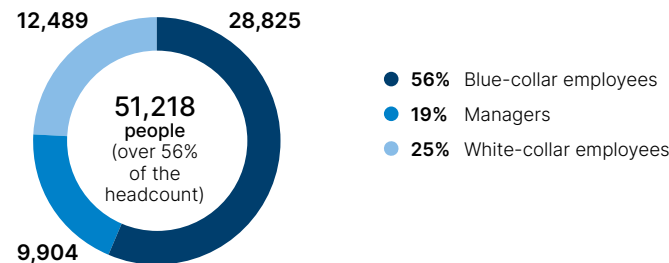
training.¹ Under the Training Strategy, training programmes targeting critical competencies involve all personnel categories. In the reporting year, more than 51,000 employees completed such training, covering topics directly impacting human rights protection.

¹ In man-hours. The following competencies are identified as critical for the Company: occupational health and safety, ESG, digital proficiency.

Critical competencies training indicators in 2023

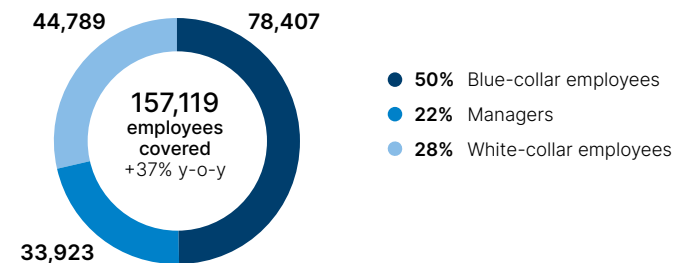
Employees covered by training programmes on critical competencies

people



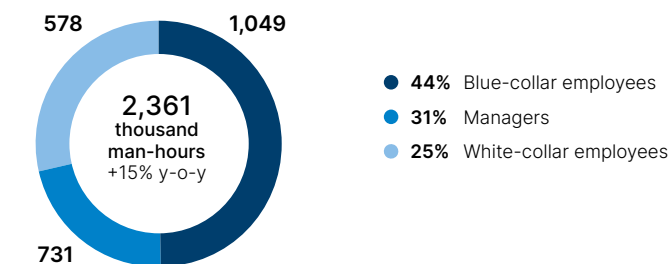
Employees covered by training programmes on critical competencies

man-events



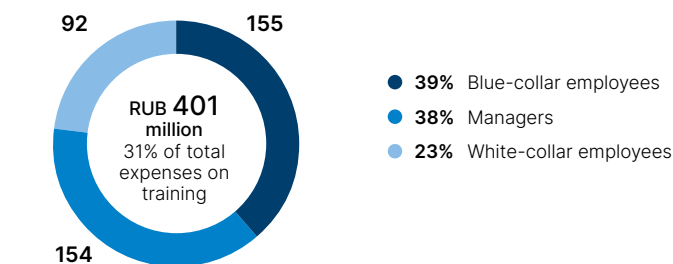
Training on critical competencies

'000 man-hours



Critical competencies training expenses

RUB mln



In line with the widespread digitalisation trend, the Company enhances employees' relevant skills through webinars, seminars, and other training events utilising various software and modern technologies.

Regarding sustainable development, Nor Nickel offers both general ESG courses and specialised ones, covering topics such as climate, corporate governance, and more. For the purposes of environmental education,

in 2023 the Company developed the Preserving Ecosystems platform,¹ an interactive tool for employees and other stakeholders to learn about and engage in issues of biodiversity and ecosystems in the regions where the Company operates. The website provides access to up-to-date data and educational materials, structured into nine sections.

OHS upskilling of Nor Nickel employees is carried out through briefings and training courses, including special

comprehensive programme modules factoring into the specifics of our operations. As another important OHS training tool, the Company has been implementing a project on the workplace safety culture coaching, which helps foster a safer working environment and employee behaviour and, ultimately, respect for the right to life, health and workplace safety.

Workplace safety culture coaching system

In 2022, Nor Nickel launched a new OHS project, the workplace safety culture coaching system. There are two training programmes currently on offer: Dynamic Risk Assessment and Behaviour-Based Safety Audit.

During training, employees acquire skills in risk identification, including dynamic workplace assessments, while managers develop competencies in communication through behavioural audits focused on occupational safety. For these training programmes, Nor Nickel engages external teachers. This inclusive approach to the training process, involving all stakeholders, is aimed at reducing the incidence of injuries.

In 2023, the Company held:



3,111 training sessions for 45,000 participants in Dynamic Risk Assessment

1,151 training sessions for 13,000 participants in Behaviour-Based Safety Audit

Human rights training for employees of security organisations

CHRB D.3.7

To ensure group-wide safety and physical security, 1,400 security personnel are employed daily (totalling more than 5,000 individuals). The Group relies on 20 major security service providers.

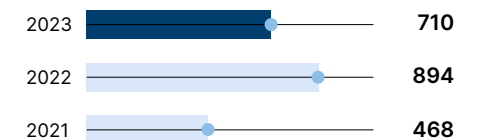
MMC Norilsk Nickel's Human Rights Policy addresses concerns regarding the use of force and firearms.

To become licenced, all private security officers are obliged to complete professional training programmes and pass a qualification exam as established by the Russian Government. Standard training plans for private security guards cover such topics as protecting the life and health of citizens, providing first aid to accident victims, and adhering to established rules and safety measures when handling weapons. Additionally, employees of security organisations are subject to annual checks or exams, to confirm their qualifications.

Regular on-site visits aim to inspect the activities of security organisations. In 2023, these inspections revealed no violations of human rights by employees of such organisations. Information on all incidents is communicated through the extensive network of situation rooms.

Nor Nickel's security units organise training sessions and drills for security officers, often in collaboration with law enforcement agencies. They also administer tests on laws and regulations pertaining to private security operations and arms in circulation.

Training sessions held for employees of security organisations



¹ For more details, please see <https://life.nornickel.com/>.

STAKEHOLDER ENGAGEMENT

CHRB B.1.8, CHRB B.1.4.a, UNGPs RF A2.1, UNGPs RF C2.2

Nornickel is committed to forging strong stakeholder relationships anchored in respect, trust, and mutual benefit, guided by ISO 26000:2010 and AA1000SES (2015) standards.

The Company's stakeholder engagement ethics, principles, and procedures are set out in MMC Norilsk Nickel's Stakeholder Engagement Policy, Business Ethics Code, Human Rights Policy, Community Engagement Policy, and other by-laws.¹

Constructive stakeholder engagement enables us to properly manage risks while efficiently integrating sustainability principles into our strategy.

CHRB B.2.5, UNGPs RF A2.3

The Company employs various interaction formats, including assistance in preparing documents and materials, training sessions, in-person meetings, public discussions and disclosures (corporate website, mass media).

Nornickel consistently gathers formal and informal feedback on its initiatives and events. Overall, stakeholder representatives positively assess the quality of the dialogue and believe it is conducted respectfully and considers the interests of all parties involved.

The Human Rights Report outlines the Company's engagement with stakeholders identified as at risk of human rights violations.

→ For more details on stakeholder engagement, please see the corresponding section of [Nornickel's 2023 Sustainability Report](#).

To increase employee awareness, improve trust between workers and the leadership, and raise employee engagement, Nornickel carried out the following activities in 2023:

- expanded and improved its communication channels (launched the Nornickel ESG Insights newsletter and Supernika corporate app);
- held Nornickel Live, a Q&A session with Vice Presidents, as well as live sessions at the Company's divisions, which gained over 25,000 viewers;
- held Corporate Dialogues featuring division heads and key executives (roughly 3,000 attendees);
- ran seven information campaigns on remuneration, bonuses, social support, and safety culture.

Supernika corporate app

SUPERNIKA is a shared digital environment for the Company employees offering accessible and secure communication channels (chats, audio and video calls, file and document exchange), corporate services (personal account, corporate programmes, career development assistance), as well as digital media features (news of Company facilities and projects, competitions) and career counselling options.

Over **50,000** employees of the Group are already using the app.



UNGPs RF C2.3

Employee engagement

Interests

- decent salaries
- favourable and safe working conditions
- social benefits and guarantees
- the Company's stability as an employer
- opportunities for personal and professional development

Interaction mechanisms

- joint commissions, committees and working groups, discussions with trade unions and labour councils, corporate communities
- offices for operating, social and labour matters, the Corporate Trust Line
- targeted polls, research focusing on engagement measurements and efficiency of social programmes
- corporate media, booklets, information screens and boards, online portal, mobile app

Engagement with local communities and indigenous peoples

Interests

- improvement of living standards for local communities
- employment of local population
- SME support
- training of highly skilled professionals
- environmental protection

Interaction mechanisms

- working and expert groups, commissions, committees and councils
- one-on-one negotiations, working meetings
- forums, conferences, fairs, and round table discussions

¹ All of the Company's by-laws are available on its official website at <https://www.nornickel.com/investors/disclosure/corporate-documents/>.

Nornickel is committed to an ongoing dialogue with local communities in its regions of operation, seeking to positively influence their quality of life. The Company focuses on fostering conditions for unhindered development and improving the social environment's appeal. The Company's priority in this field is to support local social initiatives, engage people in cooperation, and boost social capital. Nornickel supports numerous initiatives and activities as part of territorial development institutions' efforts, such as Norilsk

Development Agency, Monchegorsk Development Agency, Second School Centre for Community Initiatives of the Pechengsky District.

➔ For more details, please see [Nornickel's 2023 Sustainability Report and the Local Communities and Human Rights section of this Report.](#)

One of the most essential procedures for protecting the rights of indigenous peoples is the procurement of the Free, Prior and Informed Consent (FPIC), with Nornickel

pioneering the FPIC procedure in Russia's Arctic zone during the Tukhard residents' relocation. The Company completed the procedure in full compliance with international standards and plans to further spread this experience.

➔ For more details, please see the [Indigenous Peoples and Human Rights section.](#)

Interaction with suppliers and contractors

Interests	Interaction mechanisms
<ul style="list-style-type: none"> streamlining procurement as regards timelines and engagement procedures accessibility of procurement procedures participation in the Company's projects 	<ul style="list-style-type: none"> meetings, conferences, fairs, in-person and online negotiations long-term agreements (contracts) supplier assessment and surveying as part of the Mineral supply chain due diligence management system interaction through the Shipment Notice and SAP SRM portals

The Company rolls out a responsible supply chain to promote the sustainability agenda among its suppliers and encourage their compliance with the respective corporate standards. Since 2021, Nornickel has been employing the mineral supply chain due diligence management system through which the Company assesses mineral suppliers to make sure they comply with the OECD Guidance.¹ In 2023, the Company conducted a pilot assessment of sustainability practices of the suppliers of goods, works and services for compliance with the [Supplier Code of Conduct](#).

➔ For more details, please see the [2023 Responsible Supply Chain Report](#).



¹ OECD Guidance means the Organisation for Economic Co-operation and Development Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas.

REMEDIES AND GRIEVANCE MECHANISMS

Corporate Trust Line

Grievance policy

CHRB A.1.4, CHRB A.1.5, CHRB C.5, UNGPs RF C6.1

Corporate Trust Line

CHRB C.1

The principal query and claim management tool is the Company's Corporate Trust Line established in 2010.

CHRB C.4, UNGPs RF C6.2

For every stakeholder wishing to make a report, toll-free channels are available 24/7: telephone, email, online form on

the Company's website, or by sending a letter to the Trust Line. It handles reports on a wide range of matters related to violations of procedures and by-laws, including with respect to human rights, labour, production, social relations, etc.

The Company does not administrate any punishments or disciplinary actions and does not discriminate or retaliate against the persons who voice their concerns.

UNGPs RF C6.3

In 2023, MMC Norilsk Nickel developed and approved the new Procedure on the Corporate Trust Line.

Contacts of the Corporate Trust Line:

- skd@nornik.ru;
- +7 (800) 700-19-41;
- +7 (800) 700-19-45;
- <https://www.nornickel.com/sustainability/corporate-hotline/>;
- 15, 1st Krasnogvardeysky Drive, Moscow, 123100, Russia, Corporate Trust Line of MMC Norilsk Nickel.

New options introduced by the updated Procedure on the Corporate Trust Line

- Whistleblowers are provided with a confirmation of complaint/report registration (including information on standard handling time)¹
- Independent experts are engaged to review the grievance and develop corrective actions
- Whistleblowers and reported employees may be subject to an enquiry¹
- Whistleblowers are provided information on the decision made (response)¹
- Whistleblowers can fill in a feedback form to give their opinion on the consideration and settlement of a complaint (whistleblower satisfaction assessment)
- The Company may publish anonymised information on the subject of complaints and the results of their consideration

¹ Subject to consent/contact information.

The standard handling time from the registration of a complaint/report by the service operator to the review of the information received and the following assessment of the response by the Head of the Corporate Trust Line is 21 business days. Exceptions are made for complaints/reports that require immediate action or additional

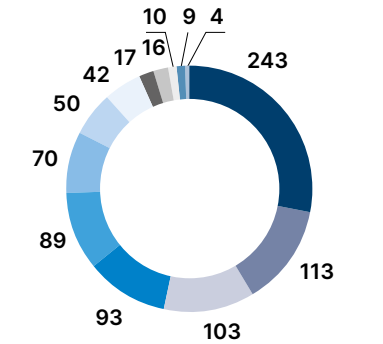
investigation. If a complaint/report is found justified, a set of control measures is taken, and if a violation is confirmed, steps are taken to correct the situation, eliminate any negative consequences, and inform those concerned.

The grievance statistics (broken down by Group company) are submitted to units in charge on a quarterly basis. The efficiency of the Corporate Trust Line is assessed by the Vice President for Internal Control and Risk Management, the Board's Audit Committee and employees. Questions on the Corporate Trust Line efficiency are included in employee engagement surveys.

CHRB C.8, UNGPs RF A2.5, UNGPs RF C6.4

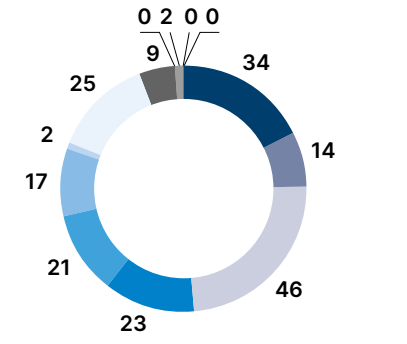
Complaints/reports in 2023 by type reported

Reports received in 2023 by type of reported abuse



- Labour relations
- Responsible sourcing
- Technology, health and safety abuses (excluding environment)
- Payroll abuses
- Ethics
- Production-related abuses
- Social issues

Reports confirmed in 2023 by type of reported abuse



- Commercial and contractual activities
- Conflict of interest (pre-conflict situation)
- Theft
- Corporate fraud
- Human rights and freedoms
- Corruption

Complaints/reports accepted for review in 2023

859 in total

Complaints/reports confirmed

193 in total

According to the 2023 survey results, **60%** of employees believe that the Corporate Trust Line considers all incoming complaints/reports timely and objectively, irrespective of the position of employees reported therein (up by 13 p.p. from 2021).

Based on our "Let Everyone Be Heard. What Do You Think?" survey in 2021-2024

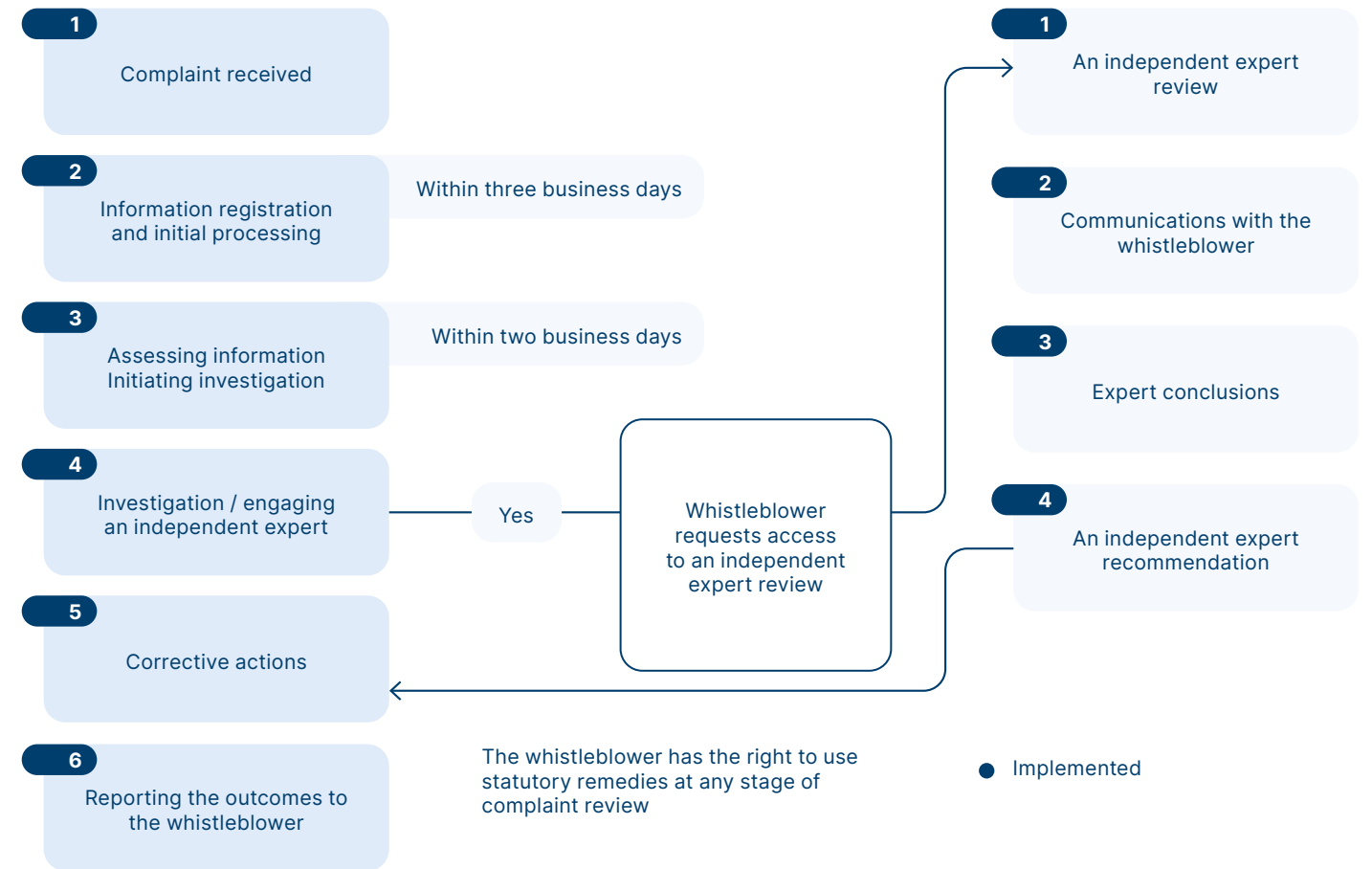
Grievance mechanism

CHRB C.2, CHRB B.1.6, CHRB C.7

The grievance mechanism is a corporate procedure geared towards external stakeholders (residents in the regions of operation, suppliers and contractors, indigenous communities, etc.), as well as towards the Company's employees.

The main purpose of the grievance mechanism is to efficiently address complaints and grievances received by the Corporate Trust Line or through other channels. It also aims to prevent, identify, and eliminate human rights risks.

The grievance mechanism procedure



Separate remedies are provided for the FPIC procedures concerning the construction of the new Tukhard settlement and the development of the Kolmozerskoye lithium deposit (for more details, please see the Remedies for Local and Indigenous Communities section).

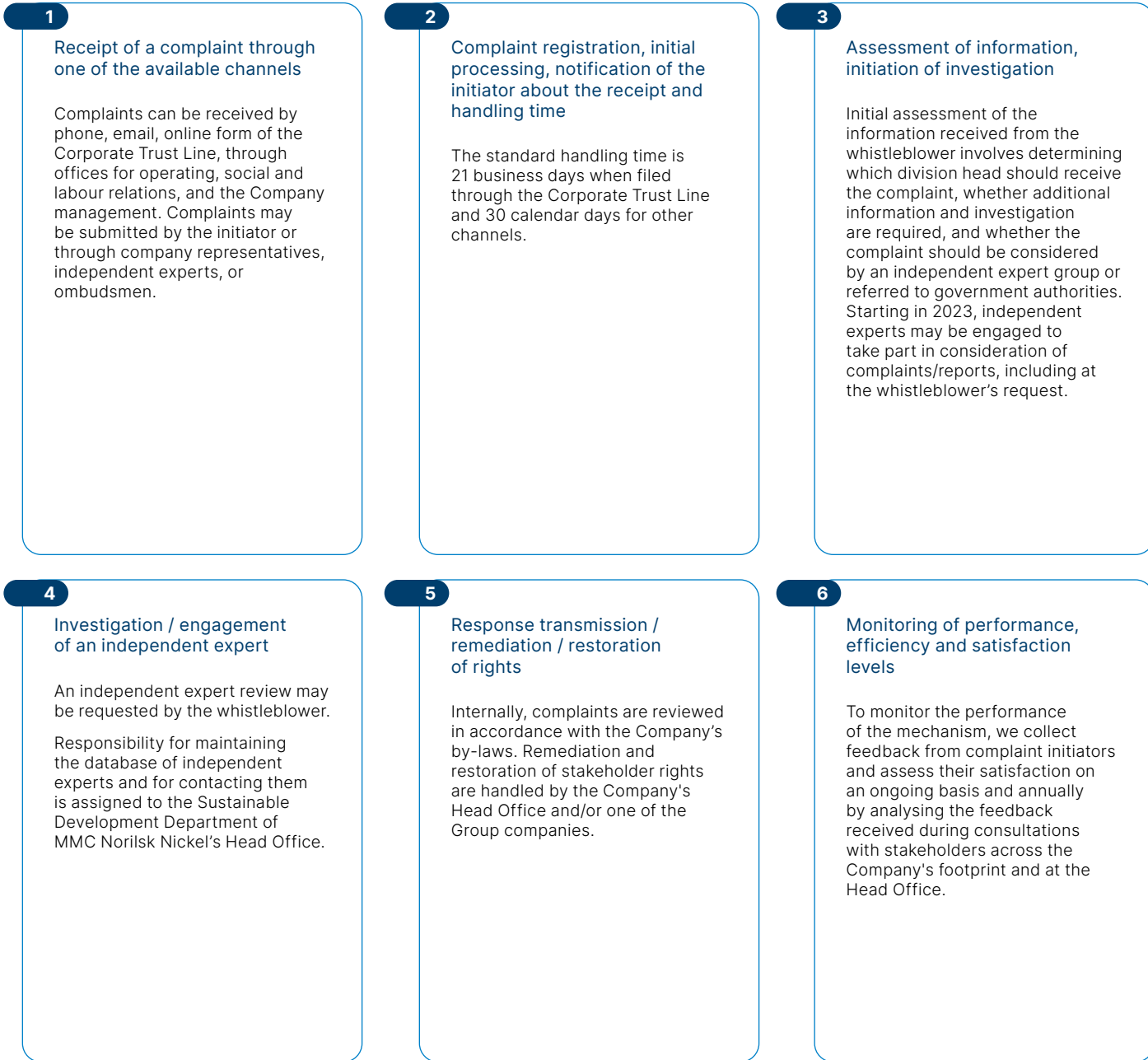
CHRB C.6

The new mechanism provides for pre-trial dispute resolution through dialogue and mediation, which is an alternative dispute resolution method based on finding a mutually acceptable solution through

the mediation of an impartial third party (independent expert). The mechanism does not replace any existing statutory or corporate rights protection mechanisms. It is not mandatory and does not limit the right to statutory remedies.

CHRB C.4

Stages of the grievance mechanism



CHRB C.3

In 2024, we intend to further improve our grievance mechanism by using robotics and process automation.

Remedies for local and indigenous communities

In line with [MMC Norilsk Nickel's Indigenous Peoples' Rights Policy](#) the Company ensures discussion and cooperation on issues affecting the interests of indigenous peoples in its regions of operation. Information on alleged human rights violations is also collected via Nornickel's Corporate Trust Line.

For the Free, Prior, and Informed Consent (FPIC) procedure regarding the construction of the new Tukhard settlement on the Taimyr Peninsula and the development of the Kolmozerskoye lithium deposit in the Murmansk Region, separate grievance mechanisms were in place. The procedure was run independently of the Company and involved an external human rights organisation, KMNSOYUZ¹.

0 cases of violations of indigenous rights in 2023

KMNSOYUZ

1. Receiving a complaint/report
2. Registering information, starting initial processing
3. Assessing information, initiating investigation
8. Discussing the situation with the whistleblower

Nornickel

4. Developing corrective actions (where necessary)
5. Preparing a report
6. Reporting to indigenous peoples
7. Fact checking

¹ The Union of Indigenous Peoples SOYUZ.



NORNICKEL'S HUMAN RIGHTS ACHIEVEMENTS IN 2023

Employees and human rights

UNGPs RF C4.3, UNGPs RF C6.5

Our Sustainable Social Development Strategy through 2030 aims to:

 <p>facilitate employee retention, professional growth and development</p>	 <p>achieve zero fatalities and reduce workplace injuries and occupational diseases</p>	 <p>foster sustainable social and economic development across the Company's footprint</p>
 <p>improve onboarding to welcome new employees and enhance engagement of seasoned professionals</p>	 <p>minimise social risks in the Company's operations</p>	 <p>contribute to the well-being of society at large nationally and internationally</p>
 <p>align working conditions with the needs of our staff</p>	 <p>attract young talent and experienced professionals and reduce employee turnover</p>	

The Company gives every employee an equal opportunity to exercise their basic and labour rights. We are also committed to addressing socially significant issues in all regions of our operations.

Working conditions

In accordance with the Russian Labour Code and the [Working Conditions Policy](#), the Company guarantees that:

- the working week shall not exceed 40 hours¹ and every employee shall be entitled to a minimum uninterrupted rest period of 42 hours per week;
- the working time for production staff shall not exceed 8 hours a day¹;
- for full-time employees working between 10:00 pm and 6:00 am, working time shall be reduced by one hour without the need to compensate therefor;
- employees shall be entitled to a minimum rest break of 30 minutes per every working day;
- employees shall be entitled to additional rest breaks due to specific process flow requirements and for production and labour management purposes;
- employees may work a second job outside their main working hours.

Our employees are entitled to a 28-day paid annual basic leave and additional paid annual leaves for those working in the Far North and equivalent areas, exposed to adverse and/or hazardous working conditions or otherwise. Our employees may reschedule or split up their leaves.

On an annual basis, the Company covers round-trip travel to a holiday destination for employees in the Far North and equivalent areas and their families, including associated baggage fees.

To ensure favourable and safe working conditions, Nornickel runs its dedicated Made with Care employee comfort programme. Key initiatives include renovating, repairing and building social infrastructure for employees, such as changing facilities, shower and toilet units, eating areas, etc.

As at the end of 2023, the Group companies operated more than 3,500 sanitary, amenity, sports and fitness, catering, healthcare, and recreational facilities with a total area of over 370,000 m². In the reporting year, the Company completed overhauls at 138 social facilities with a total area of 21,000 m² and improved social and working conditions for 8,598 employees.

As a result, Made with Care programme won international recognition from WOW!HR and Green Property Awards.

¹ Except for when a cumulative approach to time-keeping is used or when there are no fixed working hours or as otherwise provided by Russian labour laws, where employees may be requested to work outside their regular working hours.

Collective bargaining agreements

CHRB D.3.3

Nornickel and its Russian business units make sure that their employees are free to form and join trade unions of their choice, and respect their right to freedom of association and collective bargaining. Employees may exercise this right without prior authorisation and without fear of pressure, intimidation or retaliation.

22
collective bargaining agreements

signed by the Group's business units

94%

Nornickel employees covered by collective bargaining agreements

7.3%

of the Group's employees are members of trade unions

76.5%

of the Group's employees are represented by social and labour councils

Employee onboarding

Relocation

Due to the harsh climate conditions of the Group's production assets, many employees need to settle into a new job. Our Relocation programme facilitates onboarding and provides for a compensation package payable to new hires in the regions where the Company operates. Nornickel offers a one-time relocation allowance and covers moving expenses (including baggage fees), hotel accommodation and rental costs for employees and their families. Under the programme, the Company pays a relocation benefit and the highest possible bonus to those working in the Far North from the first day of employment as provided for by the collective bargaining agreement, and grants an additional paid leave for an employee to settle in during the first year of employment. As at the end of 2023, the programme covered 61 of the Company's employees, including 27 new participants who joined in the reporting year.

Relocation support

Nornickel also provides assistance in relocating newly hired employees, their family members and apprentices (candidates) with whom the Company has entered into professional training contracts to their place of work in Norilsk and the Taimyrsky Dolgano-Nenetsky Municipal District. The Company covers moving expenses and rental costs (for three years) in addition to lump sum payment for resettlement. With 1,900 employees joining the

relocation support programme in 2023, it now has a total of more than 4,600 participants.

Other onboarding tools include:

- regular welcome breakfasts;
- automated onboarding system facilitating HR management and available via the employee's online account (accessed by 17,100 employees in 2023);
- Our Values course at Nornickel Academy;
- memos, guides and videos on working with the Company as part of the Onboarding from A to Z course at Nornickel Academy.

These tools help new employees learn about the Company's business lines, geography and strategic priorities, recognise their business unit's contribution to the overall performance and embrace the corporate culture and values. 2023 saw over 3,500 managers and more than 1,000 supervisors involved in onboarding efforts, including all types of support and assistance.

The Company has a mentoring programme in place to help employees learn professional skills and integrate into the corporate culture, with seasoned professionals acting as mentors.

"In Good Company" is another corporate project that aims to promote creativity and professional growth and to build a community of young leaders aged under 35. As at the end of 2023, the programme's mobile app had over 6,600 registered users. The programme helps young talent gain valuable experience and forge a community of like-minded people where everyone can get help.

The Company offers fascinating career opportunities to best performers. Over the last seven years, satisfaction with this aspect has increased

by **27** p. p. rising from 29 to 56%.

Based on our "Let Everyone Be Heard. What Do You Think?" survey in 2018–2024

Staff and career development

To provide all employees with career and growth opportunities based on their opinions and proposals, Nornickel offers a 360-degree competency assessment along with individual development plans.

Employees at all levels who underwent a 360-degree competency assessment can join a 360-Degree Management programme for corporate and leadership competencies. Participants had the autonomy to choose learning topics



Guidebook for new employees

It is important that each new employee feels like part of the team and enjoys the support of their colleagues. Our guidebook is here to make your onboarding smooth and easy. It creates awareness about working with the Company, its operations, corporate regulations and narratives.

based on the results of the assessment, discussions with their supervisors, and individual development plans. The programme stands out for its format, which combines interactive training sessions, business simulations, and the practical review of real management cases. A total of 59 in-person training sessions were conducted in 2023 in Moscow, Norilsk, and Monchegorsk, with the participation of 1,081 employees. Furthermore, as part of the programme, all Company employees were also offered nine online workshops catering to skill development needs and garnering over 3,500 views.

Maternity and childhood protection

CHRB D.3.9

We bolster our employees' aspirations for a work-life balance. The Company creates a favourable environment for those on maternity or childcare leave and implements projects aimed at supporting and developing children of its employees, attesting to Nornickel's adherence to employees' right to the protection of family, maternity and childhood.

Financial aid and one-time payment allocation framework

Who is entitled	On what terms	How often	How much
Employees on maternity leave	Upon occurrence	One-time	Extra pay to make up for their fixed or average wages
Employees giving birth to or adopting a child (children)	Payable per child to one of the parents	One-time	RUB 20,000–30,000 depending on the region
Employees on leave to care for children up to three years of age	Payable per child in the specified age bracket	Monthly	RUB 3,500–5,000 depending on the region
Employees raising disabled children under the age of 18	Payable per disabled child	Quarterly	RUB 10,000–15,000 depending on the region

Nornickel provides employees' children aged 6 to 16 with discounted holiday tours. The programme offers the opportunity for parents to send their children to health resorts with favourable climate conditions. In 2023, a total of 1,592 kids of the Company's employees spent their summer holidays at a recreation camp in Anapa, while a children's sports team had a good time at the Universiade Village in Kazan.

Remuneration and social benefits

CHRB D.3.1

We show care for our employees by providing them with fair and decent remuneration, with an average monthly pay coming in at RUB 184,100 (2.5x the Russian average). The Company raised salaries by 6.1% in 2023 vs a 62% increase in 2018–2023, which is much above the inflation rate in Russia.

Nornickel also expands the range of social benefits and allowances to provide comprehensive support to employees.

In 2023, social expenses and benefits totalled

RUB 16.4 bn,

up 7.8% y-o-y. Travel and baggage VHI and health resort treatment accounted for the largest share in total expenses

In recognition for the Company's social efforts, employee satisfaction with the social package has increased

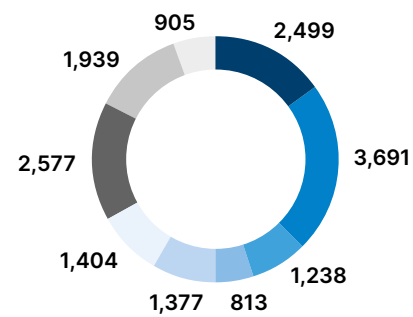
by 26 p. p.

over the last seven years, rising from 51 to 77%.

Based on our "Let Everyone Be Heard. What Do You Think?" survey in 2018–2024

Social expenses and benefits in 2023

RUB mln



- Health resort treatment and vacations of employees and their families
- Reimbursement of round trip travel expenses and baggage fees to employees and their families
- Pension plans
- Housing programmes
- Relocation assistance to new employees
- Social projects for employees (development of target categories, sporting events and holiday celebrations)
- Voluntary health and personal accident insurance
- Social payments
- Other social expenses

Digital Investor

In 2023, Nornickel launched its Digital Investor long-term incentive programme, where a digital financial asset (minetoken) is linked in value to a Nornickel share traded on the Moscow Exchange. This is the first corporate programme in Russia that gives employees an opportunity to use a new financial instrument and become an investor. These assets entitle employees to obtain additional income in the same amount as dividends on the Company's shares, as well as one-off proceeds from selling or redeeming their stake at maturity (after five years).

The programme covers all Nornickel employees who have worked with the Company for over one year.

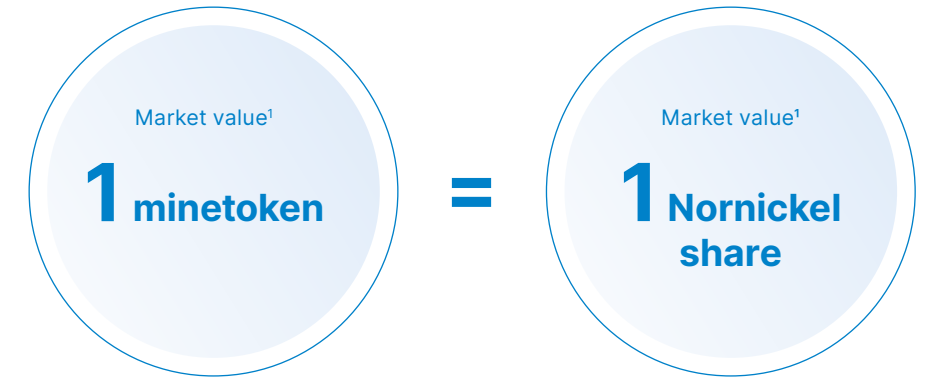
Minetokens are issued on the following terms:

1. 100% investment financing by Nornickel.
2. Participants are free to buy or sell digital financial assets after one year of ownership.
3. Income consists of regular payments and proceeds from selling digital financial assets to the issuer after five years in the amount equal to the market value of the Company's shares at the date of sale.

By creating and promoting such tools as Digital Investor, the Company maintains its social responsibility and implements a human capital development programme. As a result, employees become increasingly committed to the overall performance. The more productive and results-oriented employees are, the better the Company performs driving up the share price, which ultimately determines income from digital financial assets.

On top of that, Nornickel enables employees to get an insight into modern investment and learn the fundamentals of digital and financial literacy, which

creates a new employee engagement model turning hired workers into business partners. 2023 saw over 51,300 employees join the programme.



¹ When issued and matured.

Safety culture

CHRB D.3.4

The Company consistently develops new projects and carries on programmes aimed at enhancing safety culture, mitigating occupational diseases, and preventing workplace accidents.

According to the 2023 survey results,

56%

of employees believe that the Company does not put its staff into an unsafe working environment (up 21 p.p. over the last seven years).

Based on our "Let Everyone Be Heard. What Do You Think?" survey in 2018–2024



Work-related injuries

Indicator	2019	2020	2021	2022	2023
FIFR	0.08	0.08	0.10	0.03	0.04
LTIFR	0.32	0.21	0.38	0.58	0.65
Total number of work-related accidents under the Russian labour laws	44	31	53	71	83
Fatal workplace injuries	9	9	11	4	5
Occupational diseases	290	235	213	174	145


The growth of recordable accidents and lost time injuries (LTIFR) in 2023 was attributed to a change in our OHS approach with a view to combating non-disclosure practices.

Our top management seeks to develop new projects and initiatives working towards safe occupational conditions. Stanislav Seleznev, Vice President for Ecology and Industrial Safety, was personally involved in behaviour-based safety audit trainings, which in 2023 covered managers of the Group's branches and Russian business units, and each and every member of Nornickel's Management Board.

Care for health

We make every effort to protect the health of our employees, prevent diseases, and promote a healthy lifestyle, all in line with basic and labour rights (to life, health, security, and safe working conditions).

Nornickel has been running the corporate healthcare development project since 2019. It involves building a network of



Road safety management system

In April 2023, taking into account the increased safety risks of vehicle operation, the Company developed a corporate standard establishing unified requirements for road safety initiatives in production activities, including improving labour discipline and promoting safe driving culture.

To improve driving discipline and enhance driving culture, we trained 2,855 Nornickel employees, including 100% of high-risk drivers (1,318), and 287 contractor employees. 18 vice presidents and directors of Nornickel also took safe driving courses.

Workshop medical service

To address employee emergencies, take preventive measures, and monitor employee health, the Company has a workshop medical service. It is also responsible for identifying and assessing the risk of health hazards arising at the workplace, controlling health status, analysing the factors of occupational morbidity and ways to mitigate them.

corporate medical facilities in the Norilsk Industrial District, upgrading existing assets and creating new on-site medical aid posts with examination rooms. In 2021, the Company opened its first corporate healthcare centre in Norilsk, with two more to be commissioned in Talnakh and Kayerkan going forward.



New corporate healthcare centre in Dudinka

In June 2023, Nornickel opened its second corporate healthcare centre in the Arctic. Staffed and equipped to its full extent, it is set to enhance healthcare services in Dudinka where Nornickel has several thousand employees.

The centre is equipped with cutting-edge diagnostic tools and relies on the best practices to detect and cure diseases. It was integrated into the Company's unified digital system collecting data from all corporate healthcare centres and facilities, including Zapolyarye Health Resort.

>13,000
patients annually

22 resident staff

6 staff
on a permanent basis

9 primary health care referrals

90 patient visits per shift

Ongoing monitoring and medical check-ups in 2023

7,688 employees, including

1,512 specialist examination prescribed

333 under ongoing monitoring
28 occupational diseases detected

Healthy Heart

Nornickel embarked on the Healthy Heart programme in 2023.

It aims to reduce the number of hospital admissions, minimise morbidities, and improve the quality and length of employee lives.

The programme focuses on:

- screening to identify and monitor health status groups, take preventive measures, and provide advice;
- ongoing monitoring to identify those to be placed under doctor's care, schedule appointments on a quarterly basis, and urge patients to attend their appointments;
- training for paramedics in self-control skills and protocols to handle life-threatening cases.

Diabetes School

Nornickel pays special attention to detection and prevention of diabetes cases with a focus on knowledge and skills necessary for self-control and healthy lifestyles. Training includes self-control skills, therapy adjustments to specific living conditions, prevention of acute and chronic complications.

Nornickel embarked on the Diabetes School programme in 2023. It follows clinical guidelines, WHO recommendations and is based on the structured learning principle. Going forward, patients' penchant for medical check-ups and treatment is set to increase, also contributing to better life expectancy and fitness to work. The programme seeks to improve the quality of employee lives, making them more productive. We also expect to see fewer uncontrolled diabetes cases at our industrial sites.

IT healthcare projects

Since 2023, Nornickel has been running the medical self-diagnostic kits project aiming to protect employee's health. Software and hardware suites designed for quick health checks improve therapy efficiency and make it possible to assess patients' health status in absentia, which saves doctors' time and allows them to better manage specialist appointments.

The main target audience are office employees who rarely undergo medical check-ups.

The disease development risk assessment system is another high-tech corporate healthcare project seeking to predict and mitigate the risks of cardiovascular diseases, diabetes and other chronic diseases, as well as to inform patients about adverse factors likely to affect their lives, and to nudge employees to keep healthy.

In 2023, we managed to analyse medical data collected through regular check-ups and used on-site terminals to automate employee risk stratification based on the SCORE scale and to monitor the relationship between the prevailing cardiovascular disease risk factors and the resulting population risk of coronary heart disease.

Telemedicine – a health care service

Included in each employee's VHI package, Telemedicine provides an opportunity to see the doctor online from home at any time without queues and long waiting times, which makes access to healthcare services more comfortable.

One can seek advice from both general practitioners and specialist physicians. Emergency and scheduled consultations are available. In case of a severe disease, an alternative opinion may be requested from medical experts.

Appointments and communication with the doctor take place via the insured person's online account, where the history of visits and medical reports are stored.

Genome sequencing

Genome sequencing is included in our comprehensive health programme along with health resort treatment, VHI and corporate sports programmes. This is an advanced high-tech DNA analysis initiative providing personalised information about employees' health, multifactorial disease risks, cancer risks, as well as advice on disease prevention, nutrition care, optimal physical activity, selection of medications.

A total of 18,500 employees took part in the genome sequencing programme in 2020–2023, with another 3,500 people expected to join in 2024.

Remote advice on legal, psychological and financial issues

Mental health is equally important to the well-being and development of our employees. If one needs advice or support on legal, psychological and financial issues, this can be done remotely (by phone or video conference) as part of the Nornickel Will Support programme. When applicable, you can choose to consult with a qualified expert. Everyone who joins the service receives a personal account with secure access, where the history of consultations is saved.

Suppliers and human rights

Our Sustainable Social Development Strategy through 2030 aims to:



ensure supply chain transparency in terms of social criteria



contribute to the well-being of society at large nationally and internationally

CHRB B.1.4.b, B.1.7

MMC Norilsk Nickel's Supplier Code of Conduct sets out Nornickel's human rights requirements for suppliers:

1

Prevent human rights violations in their activities and supply chains

2

Implement processes to remedy adverse impacts on human rights arising from or through their activities

3

Have robust and adequate policies in place that demonstrate their commitment to human rights and govern human rights due diligence

4

Provide training to eliminate serious human rights violations arising from their activities or relating to local communities

5

Implement an effective grievance mechanism for stakeholders to report human rights violations on a confidential and, if necessary, anonymous basis

6

Ensure that the daily working time for employees aged under 18 years does not exceed the statutory limits

7

Provide their employees with safe and sound equipment access to water and all other amenities as required by local laws

8

Prohibit all physical, verbal or sexual abuse, or threats thereof, or any other types of harassment

Nornickel expects its suppliers to comply with the sustainable development principles in addition to a responsible approach to human rights. The Company's requirements are laid down in its Supplier Code of Conduct and form part of agreements with suppliers, including:

- ban on forced or child labour or discrimination;
- safe working conditions;

- freedom of association and collective bargaining.

The Company closely cooperates with suppliers to raise their awareness and willingness to due diligence. Nornickel provides responsible supply chain training and advice along with information materials.

UNGPs RF A2.3

Suppliers were also notified of the opportunity to report to Nornickel's Corporate Trust Line which is the Company's principal grievance mechanism ([the Remedies and Grievance Mechanisms section](#)).

➔ For more details on how Nornickel manages its responsible supply chain, please see [the Responsible Supply Chain Report](#).

Local communities and human rights

Our Sustainable Social Development Strategy through 2030 aims to:



attract young talent and experienced professionals, including to Russia's Far North



improve onboarding to welcome new employees and enhance engagement of seasoned professionals



minimise the Company's impact on local communities



foster sustainable social and economic development across the Company's footprint



contribute to the well-being of society at large nationally and internationally

Healthy environment

Nornickel respects the right of all people to a healthy environment and strives to reduce its environmental footprint in the regions where it operates, as well as to introduce environmental initiatives.

In October 2023, Nadezhda Metallurgical Plant launched its Sulphur Programme. Once the project reaches its target parameters, the Company will be able to meet 2024 statutory requirements for cutting pollutant emissions in Norilsk by at least 20%.

In 2025, sulphur dioxide emissions will be down by 45% from 2015, our baseline. The programme aims to deliver drastic cuts in sulphur dioxide emissions in Norilsk in order to make the air free from pollutants, coupled with a positive impact on public health.

In 2023, we also made an extensive research of biodiversity in the regions of our operations and continued with the programme for waste collection and land rehabilitation in Norilsk and other environmental initiatives.

➔ For more details, please see [the 2023 Sustainability Report](#).

Nornickel employees believe that the Company cares about the environment across its footprint. Over the last seven years, satisfaction with this aspect has increased

by **30** p. p.

rising from 30 to 60%.

Based on our "Let Everyone Be Heard. What Do You Think?" survey in 2018–2024

Healthy social environment

Nornickel respects the rights of local communities and runs a number of programmes to improve their living standards.

The World of New Opportunities is the Company's flagship programme (ongoing since 2015), which aims to improve the well-being of Arctic residents. In 2023, the programme embraced more than 15,000 people residing in the regions of our operations.

Key dimensions of the World of New Opportunities programme in 2023

Dimension	DEVELOP!	INVENT!	ACT!	CREATE!
Purpose	Support of public initiatives and development of local territories through building partnerships	Fostering of R&D creativity and the spirit of invention	Development and growth of service-based economy	Advanced development of regions
Programmes and projects	<ul style="list-style-type: none"> • We Are the City! social technologies forum • Socially Responsible Initiatives competition • World of Taimyr project competition • Travel grant competition • We Are the City! social engineering workshop • We Are the City! picnic • School Break educational project 	<ul style="list-style-type: none"> • IMAKE engineering marathon • IN'HUB international forum of innovators 	Accelerator for regional entrepreneurs and investment session	Projects of regional development institutions: Norilsk Development Agency, Second School Centre for Community Initiatives of the Pechengsky District, Monchegorsk Development Agency

The Company deems important to develop a youth ecosystem as an efficient tool for attracting, fostering and retaining young talent. Currently, we focus on engineering capabilities to upgrade our production facilities.

To this effect, Nornickel launched the Building the Future: Nurturing Engineering Talent project in 2023 with a view to igniting strong interest in engineering professions and career opportunities in the industry. As part of its educational

ecosystem, the Company develops multifaceted programmes tailored to various age groups, ranging from 5 to 35 years old.

Nornickel's youth ecosystem projects by age

Children (ages 5-17) and their parents

- Nornickel Lessons
- Guided tours to the Group's facilities
- School Break
- SVET ON
- LIGA IMAKE
- City of Professions
- Tsifronikel.Junior

Students (ages 18-24)

- Hands-on educational programmes in partnership with educational institutions
- Conquerors of the North
- Career Start-Up
- Polar College
- Bystrinsky GOK'S
- Generation FAST

Young talent (up to 35 years old)

- In Good Company
- First Arctic
- Those Who Care
- Plant of Goodness





➔ For more details on the World of New Opportunities programme, please see the [2023 Sustainability Report](#).



Indigenous peoples and human rights

CHRB A.1.3.a.EX; D.3.5

Strategic goals:

 minimise the Company's impact on local communities	 support the interests of indigenous northern minorities	 foster sustainable social and economic development across the Company's footprint	 contribute to the well-being of society at large nationally and internationally
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Nornickel respects the rights of indigenous peoples. The Company respects and exercises the right of indigenous peoples to a Free, Prior and Informed Consent (FPIC), creates platforms for an equal dialogue involving representatives of both indigenous peoples and the Company, including the Group's management, and implements sustainable development projects for indigenous peoples with a view to supporting the economy based on the traditional use of natural resources, improving rural ways of living, and fostering indigenous traditions and culture.

In 2021, Nornickel established a Coordinating Council for Interacting with Family (Tribal) Communities of Indigenous Northern Minorities supervised by the Company's Senior Vice President, Head of Norilsk Division. The Council brings together 57 tribal communities engaged in traditional economic activities on the Taimyr Peninsula.

Programme to support indigenous peoples

Since 2020, Nornickel has been implementing one of its largest programmes in terms of financing to support and promote indigenous peoples, with over RUB 2 bn earmarked for five years. In 2021–2023, the Coordinating Council for Interacting with Family (Tribal)

Communities of Indigenous Northern Minorities assigned an additional RUB 300 mln (RUB 100 mln annually) to support indigenous peoples and foster their traditional economic activities.

The Company covers expenses to transport agricultural products (reindeer meat, northern species of fish) from settlements and hunting/fishing facilities located in the Taimyrsky Dolgano-Nenetsky Municipal District (cities of Dudinka and Norilsk) to retail chains for further resale. Nornickel also supported a research to assess the water bioresources of the Yenisey and Khatanga rivers with a view to raising indigenous peoples' quotas.

2023 saw seven houses built and three first aid and obstetric facilities commissioned in Volochanka, Ust-Avam and Ust-Port. We also purchased five apartments in Dudinka for orphaned children.

Ongoing relocation of indigenous peoples in Tukhard

Nornickel was the first company in the Russian Arctic to obtain FPIC for launching the Tukhard relocation and development programme in line with the standard of responsibility of residents in

the Arctic zone of the Russian Federation and international requirements (the UN Declaration on the Rights of Indigenous Peoples, International Financial Corporation's Performance Standard 5 (Resettlement) and Performance Standard 7 (Indigenous Peoples)).

Following five months of the FPIC negotiations and three rounds of consultations, the residents of Tukhard consented to relocation, identified development priorities, chose the site for their new settlement, elected the Council of Representatives, and defined the terms of interaction with the Company in the design and construction process.

The agreement also caters to the needs of reindeer herders living in the Tukhard tundra and sharing close family, social, economic and cultural ties with the settlement.

The Company plans to complete the construction of the infrastructure and housing agreed with the residents of the new settlement, as well as the acquisition of apartments in Dudinka in the medium term.

Dialogue with representatives of indigenous peoples on the Kola Peninsula

In view of the planned Kolmozerskoye lithium deposit development, the Company used lessons learned in Tukhard to engage in a meaningful dialogue with the Sámi, Nenets, and Komi peoples.

We also held prior task force consultations with representatives of indigenous peoples residing in Lovozero and Krasnozhchelye (Murmansk Region) to inform local communities about the upcoming industrial project and invited them to join the FPIC process. Indigenous peoples took the lead in forming a working group of Sámi non-governmental and reindeer herding organisations which includes the Kola Sámi Association, Public Organisation of the Sámi People of the Murmansk Region, the Council of Indigenous Peoples under the Government of the Murmansk Region, and major reindeer herding farms.

In November 2023, the Company conducted an ethnological review of the Kolmozerskoye deposit development project, including environmental, sociological, ethnological and historical studies, assessment of potential impacts on the Sámi culture, traditional industries and reindeer herding practices, as well as recommendations to mitigate impacts on indigenous and reindeer-breeding peoples of the Murmansk Region and proposed sustainable development initiatives.

Youth development and capacity building of indigenous peoples

The Company takes special care of indigenous youth. Following a census held in 2023, young people accounted for 40% of Tukhard residents. Nornickel runs a number of initiatives focused on the younger generation. There were 56 indigenous students studying at the

Polar State University under the Students of Taimyr programme. We provided 11 rural educational institutions with an additional internet resource and installed satellite and office equipment.

The Social Diplomacy programme for indigenous peoples is an important capacity-building project being sponsored by the Group in cooperation with the Moscow State Institute of International Relations (MGIMO). Going forward, its participants will become leaders of their peoples capable of conducting a high-level dialogue with the state and the business community, and representing Russia's indigenous peoples on international platforms. The Company also sponsors workshops on indigenous peoples' rights held by the Union of Indigenous Peoples SOYUZ.



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→ youtube.com/user/NornikOfficial

Corporate website

→ <https://www.nornickel.com/>

Human rights at Nornickel

→ <https://www.nornickel.com/sustainability/social-responsibility/human-rights/>

Nornickel's by-laws

→ <https://www.nornickel.com/investors/disclosure/corporate-documents/#accordion-corporate-codes-and-policies>

Nornickel's 2023 Sustainability Report



Nornickel's 2023 Responsible Supply Chain Report



LIST OF ABBREVIATIONS

VHI	Voluntary health insurance
Kola MMC	Kola Mining and Metallurgical Company
ILO	International Labour Organisation
UN	United Nations
OHS	Occupational health and safety
Nickel	Nickel settlement
p.p.	Percentage points
FPIC	Free, Prior and Informed Consent
CHRB	Corporate Human Rights Benchmark
ESG	Environmental, Social and Governance
FIFR	Fatal Injury Frequency Rate
ICMM	International Council on Mining and Metals
IRMA	Initiative for Responsible Mining Assurance
KPI	Key performance indicator
LTIFR	Lost Time Injury Frequency Rate
SO ₂	Sulphur dioxide
SRM	Supplier relationship management
UNGPs	UN Guiding Principles on Business and Human Rights
VPSHR	Voluntary Principles on Security and Human Rights

GLOSSARY

Stakeholder engagement	the Company's activities aimed at identifying stakeholders' expectations and concerns and their engagement in decision-making process
Norilsk Nickel Group	MMC Norilsk Nickel and its subsidiaries
Complaint/report	message containing information on a current or potential issue pertaining to the Company's activities and raising a legitimate concern, as well as on an adverse impact on the Company's stakeholders and employees, violation of human rights, protection of assets and corporate interests, prevention of abuse, theft and other violations at the Company's business units
Stakeholders	individuals, legal entities, groups, associations and other organisations whose interests can be potentially affected by the Company's operations, as well as parties that can influence it
Minetoken	a digital financial asset linked in value to a share in MMC Norilsk Nickel
Mediation	method of alternative dispute resolution based on finding a mutually acceptable solution through the mediation of an impartial third party (independent expert)
Grievance mechanism	additional corporate procedure available to external stakeholders (local and indigenous communities, suppliers or contractors, etc.)
Business units	subsidiaries of MMC Norilsk Nickel
Human rights	rights that belong to every person in the world regardless of their origin, gender, ethnicity, religion, language and status
Human rights due diligence	set of measures that includes assessing impacts and risks in the value chain and conducting business responsibly in order to prevent and mitigate human rights abuses and hold businesses accountable for such abuses in which the businesses may be implicated through their own operations or relationships
Risk	the effect of uncertainty on objectives
Risk of human rights violations	potential adverse impact on right holders resulting in their rights being infringed or restricted and arising inadvertently from the Company's activities and/or violation of the Company's policies and codes by its employees

INDICATORS UNDER THE UN GUIDING PRINCIPLES ON BUSINESS AND HUMAN RIGHTS (UNGPS)

Criterion	Section/comment	Page
A — Governance of respect for human rights		
A1.1	section “Commitment to human rights”	5
A1.2	section “List of human rights priorities”	7
A1.3	section “Commitment to human rights”	5
A2 — Embedding respect for human rights		
A2.1	section “Stakeholder engagement”	22
A2.2	section “List of human rights priorities”	7
A2.3	section “Stakeholder engagement”, section “Suppliers and human rights”	22
A2.4	section “Human Rights Policy and Business Ethics Code”	8
A2.5	section “Corporate Trust Line”	26
B — Defining a focus of reporting		
B1	section “List of human rights priorities”	7
B2	section “List of human rights priorities”	7
B3	Nornickel defines salient human rights across its footprint	-
B4	The Company covers all salient human rights. No rights remain unaddressed	-

Criterion	Section/comment	Page
C — Management of salient human rights issues		
C1 — Specific policies		
C1.1	section “Human Rights Policy and Business Ethics Code”	8
C2 — Stakeholder engagement		
C2.1	The Company identifies 16 stakeholder groups. For more details on the Company’s approach to stakeholder engagement, please see the 2023 Sustainability Report	-
C2.2	section “Stakeholder engagement”	22
C2.3	section “Stakeholder engagement”	22
C3 — Assessing impacts		
C3.1	Social impacts, including respect for human rights, are subject to stakeholder scrutiny as follows from annual dialogues held in line with the international GRI Standards (for more details, please see the 2023 Sustainability Report). Based on the survey results, employee engagement is mostly driven by such factors as social security due to the extensive benefits package, mutual respect within teams, workplace safety, and the freedom to openly discuss safety risks	-
C3.2	The list of human rights priorities remained unchanged in 2023	-
C4 — Integrating findings and taking actions		
C4.1	section “Management of human rights risks”	18
C4.2	section “Management of human rights risks”	18
C4.3	Described in more detail in section “Nornickel’s human rights achievements in 2023”	-
C5 — Tracking performance		
C5.1	Respect for human rights is prioritised by the Company	-
C6 — Remediation		
C6.1	section “Remedies and grievance mechanisms”	25
C6.2	section “Remedies and grievance mechanisms”	25
C6.3	section “Remedies and grievance mechanisms”	25
C6.4	section “Remedies and grievance mechanisms”	26
C6.5	The Company’s response to issues reported to the Corporate Trust Line is described in more detail in section “Nornickel’s human rights achievements in 2023”	-

INDICATORS UNDER THE CORPORATE HUMAN RIGHTS BENCHMARK (CHRB)

Indicator	Section/comment	Page
A: Governance and policy commitments		
A.1 Policy commitments		
A.1.1 Commitment to respect human rights	section "Human Rights Policy and Business Ethics Code"	8
A.1.2.a Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	section "Human Rights Policy and Business Ethics Code" For more details, please see MMC Norilsk Nickel's Human Rights Policy	8
A.1.2.b Commitment to respect the human rights of workers: Health and safety and working hours	section "Human Rights Policy and Business Ethics Code" For more details, please see MMC Norilsk Nickel's Human Rights Policy	8
A.1.3.a Commitment to respect human rights particularly relevant to the sector: Land, natural resources and indigenous peoples' rights	section "Indigenous peoples and human rights" For more details, please see MMC Norilsk Nickel's Human Rights Policy	43
A.1.3.b Commitment to respect human rights particularly relevant to the sector: Security	section "Commitment to human rights"	6
A.1.4 Commitment to remedy	section "Corporate Trust Line"	25
A.1.5 Commitment to respect the rights of human rights defenders	sections "Corporate Trust Line", "Stakeholder engagement"	25
A.2 Board level accountability		
A.2.1 Commitment from the top	section "Governance structure, responsibilities and oversight of human rights"	12
A.2.2 Board responsibility	section "Governance structure, responsibilities and oversight of human rights"	12
A.2.3 Incentives and performance management	section "Governance structure, responsibilities and oversight of human rights"	11
A.2.4 Business model strategy and risks	section "Governance structure, responsibilities and oversight of human rights"	11
B: Embedding respect and human rights due diligence		
B.1 Embedding respect for human rights in company culture and management systems		
B.1.1 Responsibility and resources for day-to-day human rights functions	section "Governance structure, responsibilities and oversight of human rights"	12
B.1.2 Incentives and performance management	section "Governance structure, responsibilities and oversight of human rights"	11

Indicator	Section/comment	Page
B.1.3 Integration with enterprise risk management	section "Identification and assessment of human rights risks and impacts"	15
B.1.4.a Communication/dissemination of policy commitment(s): Workers and external stakeholders	section "Stakeholder engagement"	22
B.1.4.b Communication/dissemination of policy commitment(s): Business relationships	section "Suppliers and human rights"	39
B.1.5 Training on human rights	section "Human rights training"	19
B.1.6 Monitoring and corrective actions	section "Remedies and grievance mechanisms"	27
B.1.7 Engaging and terminating business relationships	section "Suppliers and human rights"	39
B.1.8 Approach to engaging with affected stakeholders	section "Stakeholder engagement"	22
B.2 Human rights due diligence		
B.2.1 Identifying human rights risks and impacts	section "Identification and assessment of human rights risks and impacts"	16
B.2.2 Assessing human rights risks and impacts	section "Identification and assessment of human rights risks and impacts"	16
B.2.3 Integrating and acting on human rights risks and impact assessments	section "Management of human rights risks"	18
B.2.4 Tracking the effectiveness of actions to respond to human rights risks and impacts	section "Monitoring and control of human rights risks"	18
B.2.5 Communicating on human rights impacts	section "Stakeholder engagement"	22
C: Remedies and grievance mechanisms		
C.1 Grievance mechanism(s) for workers	section "Remedies and grievance mechanisms"	25
C.2 Grievance mechanism(s) for external individuals and communities	section "Remedies and grievance mechanisms"	27
C.3 Users are involved in the design and performance of the mechanism(s)	section "Remedies and grievance mechanisms"	26
C.4 Procedures related to the grievance mechanism(s) are equitable, publicly available and explained	section "Remedies and grievance mechanisms"	25
C.5 Prohibition of retaliation for raising complaints or concerns	section "Remedies and grievance mechanisms"	25
C.6 Company involvement with state-based judicial and non-judicial grievance mechanisms	section "Remedies and grievance mechanisms"	27

Indicator	Section/comment	Page
C.7 Remedying adverse impacts	section "Remedies and grievance mechanisms"	27
C.8 Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	section "Corporate Trust Line"	26
D: Company human rights practices		
D.3.1 Living wage ¹	section "Employees and human rights", subsection "Remuneration and social benefits"	34
D.3.2 Transparency and accountability ¹	Nornickel discloses production results and accounting statements prepared under the RAS and IFRS on the Company's website	-
D.3.3 Freedom of association and collective bargaining ¹	section "Employees and human rights", subsection "Collective bargaining agreements"	32
D.3.4 Health and safety: Fatalities, lost days, injury, occupational disease rates ¹	section "Employees and human rights", subsection "Safety culture"	35
D.3.5 Indigenous peoples' rights and Free, Prior and Informed Consent ¹	section "Indigenous peoples and human rights"	43
D.3.6 Land rights: Land acquisition ¹	The Company lends and acquires land plots for production and administrative buildings and its operations in general. Nornickel focuses on the rehabilitation of all land affected by construction, mining and emissions caused by its operations, and carries out regular audits of plant and mine closure plans (for more details, please see Nornickel's 2023 Sustainability Report)	-
D.3.7 Security ¹	section "Training at Nornickel"	21
D.3.8 Water and sanitation ¹	In 2023, no major impact of Nornickel's operations on water bodies was identified; water withdrawal was within the pre-approved limits. The Company has in place water stewardship goals for the future (e.g., keeping water recycling and reuse rates above 80%). To reduce its environmental impact, the Company implements environmental initiatives and programmes (e.g., the maintenance and operation of the auxiliary fleet which serves to prevent river water contamination)	-
D.3.9 Women's rights ¹	section "Employees and human rights", subsection "Maternity and childhood protection"	33
E: Response to serious allegations		
E.1 The company has responded publicly to the allegation	There were no serious allegations against the Company in the reporting year	-
E.2 The company has investigated and taken appropriate action		
E.3 The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)		

¹ In own extractive operations.

DISCLAIMER

The information contained herein relies on the data available to MMC Norilsk Nickel as at the date of this 2023 Human Rights Report. After this Report was prepared, the Company's operations as well as forecasts and overview of the current situation presented herein may have been affected by external or other factors, including the escalation of the geopolitical conflict in Ukraine, sanctions imposed by the United States, the European Union, the United Kingdom and other nations against the Russian Federation, Russian individuals and legal entities, Russian Federation's response to sanctions, economic and other measures introduced to maintain the economic and financial stability of the Russian Federation, and other factors beyond the Company's control.

The Report discloses the Company's short-, medium-, and long-term goals and plans. All plans and intentions outlined herein are provisional and subject, among other things, to a number of

economic, political and legal factors, including the factors mentioned above, beyond Nornickel's control. Forward-looking statements are subject to risks and uncertainties as they refer to events and depend on circumstances that may or may not occur in the future. Forward-looking statements are not guarantees of the Company's future operational and financial performance, and actual results of the Company's operations, its financial position, liquidity, prospects, growth, strategy, and the development of the industry in which the Company operates may differ materially from those expressed or implied by the forward-looking statements contained herein. The Company hereby disclaims any liability for any loss resulting from the use of this Report, and assumes no obligation to update any forward-looking statements contained herein.

Statements regarding the industry in which MMC Norilsk Nickel operates, as well as the Company's position relative

to its competitors are based on publicly available information published by other metals and mining companies or obtained from trade and business organisations and associations. Such data and statements have not been independently verified, and the financial and operating performance metrics of the Company's competitors used to assess and compare positions may have been calculated differently from the method used by MMC Norilsk Nickel.

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