



APPROVED
by resolution of the Board of Directors
of PJSC "MMC "Norilsk Nickel"
No. GMK/31-pr-sd of September 18, 2017

Freedom of Association Policy

Objective

PJSC "MMC "Norilsk Nickel" (the "Company" or "Nornickel") respects the rights and trade union freedoms of the Company's employees. The Company guarantees that every employee has the right to join a trade union and the right to be represented by a trade union in collective bargaining.

Scope

The Company takes all the necessary and reasonably possible steps to cause all subsidiaries to comply with the key principles and provisions of this Policy.

General information

The Company operates in the Russian Federation, which has ratified International Labour Organisation's Convention No. 87 concerning *Freedom of Association and Protection of the Right to Organise* and Convention No. 98 concerning *Application of the Principles of the Right to Organise and to Bargain Collectively*.

In accordance with the laws of the Russian Federation, employees are free to join or not join a trade union.

This document should be read in conjunction with the Human Rights Policy, the Working Conditions Policy and other by-laws of the Company.

Commitments

The Company takes every effort to enable its trade unions to perform their functions by providing them, at no cost, with office and document storage premises, furniture, communication facilities and office equipment, as well as a possibility to post information in places to which all employees have access.

When operating outside the Russian Federation, in a territory where trade union rights are limited, the Company undertakes to ensure that employees are treated in a fair way in accordance with applicable laws and global best practices.