



APPROVED

**by resolution of the Board of Directors
of PJSC MMC Norilsk Nickel**

passed on February, 2, 2018 No. GMK/3-pr-sd

Indigenous Rights Policy

Objective

PJSC MMC Norilsk Nickel (the "Company", or "Nornickel") respects the rights, traditions, long-standing values and interests of indigenous peoples inhabiting the Company's regions of operation, and fulfils its commitments to further strengthen and develop the relations that benefit both parties.

Nornickel shares the principles specified in Article 7 of Convention No. 169 of the International Labour Organization (ILO), according to which indigenous peoples shall have the right to decide their own priorities for the process of development as it affects their lives, beliefs, institutions and spiritual well-being and the lands they occupy or otherwise use, and to exercise control, to the extent possible, over their own economic, social and cultural development. This Policy defines the Company's key commitments in respect of indigenous rights and states its mission as follows:

- respecting indigenous lands;
- supporting indigenous practices of using natural resources;
- engaging in renewable biological resources restoration programmes;
- helping to preserve indigenous traditions;
- promoting indigenous trades;
- providing social support to indigenous peoples with a view to achieving modern living standards.

This Policy should be read in conjunction with the Code of Business Conduct, Human Rights Policy, and Local Community Relations Policy.

Scope

This Policy is applicable to all Nornickel employees. The Company takes all the necessary and reasonably possible steps to cause its subsidiaries to comply with the key principles and provisions of this Policy. The Company also expects its contractors to comply with the principles and provisions of this Policy.

Nornickel contributes to indigenous rights protection and improved quality of life for indigenous peoples and promotes their development in its regions of operation. Nornickel factors in their interests, views and preferences, as well as

history, culture, traditions, way of life and historical heritage. The Company acknowledges that building long-term mutually beneficial relations with indigenous peoples plays an important role in ensuring sustainable development of the Company and indigenous regions.

Regulatory framework

The Company is guided by the Indigenous and Tribal Peoples Convention (Convention No. 169) of the International Labour Organization, Federal Law On Safeguarding the Rights of Indigenous Minorities of the Russian Federation, Federal Law On Areas of Traditional Natural Resources Use of Indigenous Small-Numbered Peoples of the North, Siberia and Far East of the Russian Federation, and local laws across the Company's regions of operation.

Responsibility

This Policy was approved by the Company's Board of Directors and is subject to periodic review to ensure compliance with international indigenous rights standards as well as applicable Russian and international laws and regulations.

The Company's management is committed to complying with indigenous rights requirements of Russian and international laws and regulations. All Nornickel employees are committed to supporting the Company's respective efforts to ensure an effective dialogue with indigenous peoples.

Commitments

Nornickel seeks to develop partnerships with indigenous peoples in its regions of operation. The Company is committed to diligently ensuring discussion of, and cooperation on, matters concerning indigenous peoples in its regions of operation through consulting with non-governmental institutions acting on behalf of indigenous peoples.

The Company has identified the following key commitments:

Research and assessment

– identifying groups of indigenous peoples likely to be affected by the Company's activities.

Effective dialogue

– continuously communicating with indigenous peoples to safeguard their interests and meet their needs;
– engaging in comprehensive discussions and using cooperation mechanisms to build relationships based on mutual respect;
– preventing potential adverse effects on indigenous peoples by making management decisions with due regard to indigenous values and views at every stage of the mining and production cycle.

Monitoring

- monitoring changes to laws and international standards on indigenous rights.

Development and active cooperation

- cooperating with indigenous peoples to identify and address relevant local community issues to ensure a positive long-term impact;
- promoting social and economic development of indigenous peoples;
- promoting social, economic and cultural rights of indigenous peoples.

Reporting

- regularly providing true and up-to-date information about implementation of this Policy as part of annual corporate social responsibility reports.

Updating

- updating this Policy on a regular basis in accordance with Russian and international indigenous rights standards.

Initiatives

The Company discloses information about its participation in activities involving indigenous peoples as well as other indigenous rights initiatives in its corporate social responsibility and annual reports.

Alleged indigenous rights violations in the Company's regions of operation must be reported to Nor Nickel's Corporate Trust Service by phone at +7 800 700 1941 or +7 800 700 1945 or by email at skd@nornik.ru.