



Norilsk Nickel

Tailings Storage Facilities Disclosure

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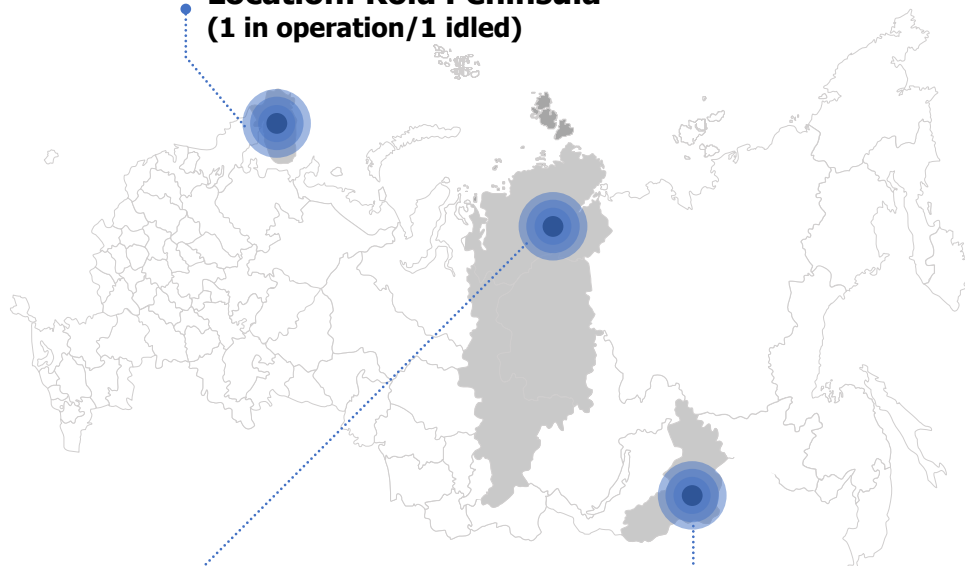
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Norilsk Nickel Tailings Facilities Overview

- The disclosure contained herein has been certified by Sergey Diachenko, Chief Operating Officer of MMC Norilsk Nickel

Kola MMC

Location: Kola Peninsula
(1 in operation/1 idled)



Polar Division

Location: Taymir Peninsula
(4 in operation)

Bystrinsky project

Location: Chita region
(1 in operation)

Key Facts:

- Norilsk Nickel operates 6 tailing dams** (5 upstream, 1 downstream) owned by the Company
- All tailing dumps have safety zones** and are located far from production sites and local communities
- No environmental accidents have been recorded** in the past 5 years
- No orders have been received from the government agencies** mandating to fix any potential accident issues
- Mandatory **comprehensive** internal and external (including independent experts and government agencies) **audits are conducted regularly**
- Each facility has an emergency plan certified by the government's agency**

Overview of Norilsk Nickel's Operating Tailing Facilities

Tailing storage facility	Hazard Class (facility ⁽¹⁾ /waste ⁽²⁾)	Status	Raising method	Launch into operation	Most recent independent expert review
Talnakh Concentrator's tailings facility	Hazard Class 2/5	Operating	Upstream	2017	2019
Nadezhda Metallurgical Plant's tailings facility	Hazard Class 2/4	Operating	Downstream	Phase 1 – from 1979 to 1981 Phase 2 –1989	2016
Lebyazhye tailings facility	Hazard Class 2/5	Operating	Upstream	Section 1 – 1983 Section 2 – 2005	2018
Tailings Facility No. 1	Hazard Class 2/5	Operating	Upstream	1948	2018
Zapolyarny Concentrator's tailings facility	Hazard Class 1/5	Operating	Upstream	1965	2019
Bystrinsky GOK's tailings facility	Hazard Class 2/5	Operating	Upstream	2019	2019

(1) According to the Resolution of the Government of the Russian Federation On the Classification of Hydraulic Structures, Hazard Class 1 is defined as extremely high hazard and Hazard Class 4 as low.

(2) According to the Order of the Ministry of Natural Resources and Environment of the Russian Federation On the Approval of the Criteria for Classifying Wastes as Hazard Classes, Class 1 is defined as hazardous, Class 5 is defined as practically non-hazardous.

Tailings Monitoring System/ Safety Management System

Tailing dams' integrity has been always at the forefront of the Company's safety agenda. Nor Nickel regularly monitors its tailings facilities to ensure their safe operation, aiming to prevent any adverse environmental impact

Norilsk Nickel dams' safety management system:

- In full compliance with the domestic legislation and standards
- Covers all stages of dams' life cycle (design, construction, operation and closure)
- Includes regular monitoring as well as internal and external audits
- Safety Declaration for each hydraulic structure is updated and approved by government agency every 5 year
- Each tailing dam has its emergency plan

Tailing storage facility	State authority/ frequency of inspections	Internal monitoring/audits
All tailing storage facilities	Environmental, Industrial and Nuclear Supervision Service of Russia (Rostekhnadzor) <ul style="list-style-type: none">• For hazard class 2 – no more than once a year• For hazard class 1 - 2-4 times a year	<ul style="list-style-type: none">• Internal monitoring - daily• Internal audits - at least quarterly• Pre-flood season inspections - annually

No environmental accidents have been recorded in the past 5 years

Emergency Plans for Tailing Dams

- As required by the Russian law, contingency (emergency) plans (ERP) have been developed for all operating tailings storage facilities
- The assessment of potential damage, which is conducted as part of safety declaration prepared for each tailings dam, suggests that risks of adverse impact on communities, eco-systems, and critical infrastructure in case of a disaster or the tailings dam failure are minimal
- The public warning system is in place
- Nor Nickel has all necessary material and financial resources required for the prompt fixture of a damage and prompt response to an emergency at its tailings dams, including a sufficient fleet of excavators, dump trucks and other vehicles (as outlined in the ERPs)

Tailing storage facility	State authority Approving emergency plan	Emergency team	Emergency supervisor	Training schedule
All Company's tailing storage facilities	Environmental, Industrial and Nuclear Supervision Service of Russia (Rostekhnadzor)	Tailing storage facility's emergency and rescue team	Responsible supervisor – head of hydraulic structures department	Regularly (up to 3-6 times a year)

Appendix (1/2)

Talnakh Concentrator's tailings facility



Lebyazhye tailings facility



Nadezhda Metallurgical Plant's tailings facility



Tailings Facility No. 1



Appendix (2/2)

Zapolyarny Concentrator's tailings facility



Bystrinsky GOK's tailings facility



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