

Appendix 1

APPROVED
by order of
Vice-President - Head of Internal
Control and Risk Management Unit
PJSC MMC Norilsk Nickel
No. GMK-11/002-r dated 22 May 2023

Procedure

on the Corporate Trust Line of
PJSC MMC Norilsk Nickel

(as amended No.GMK-44/002-r dated June 17, 2024, No.GMK/092-p dated June 20, 2024,
No.GMK-11/001-r dated July 05, 2024, No.GMK/121-p dated September 24, 2024)

Document Code: PBP GK NN RM.1.4-2023
Replaces: PBP GK NN 47-RM.1.4.1-2022
Effective from: 22 May 2023

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1. Scope and limits of application

1.1. The Procedure on the Corporate Trust Line of MMC Norilsk Nickel (the "Procedure") shall determine the procedure for receiving, registering, recording and checking complaints and messages received by the Corporate Trust Line (CTL) of MMC Norilsk Nickel (the "Company") regarding negative impacts on stakeholders as a result of the activities of the Company / Russian business units that are part of Nor Nickel Group ("Russian business units"), human rights violations or other situations related to the activities of the Company / Russian business units and causing reasonable concern of stakeholders, and regarding the protection of assets and corporate interests, prevention of abuse, theft and other violations (including violations of the Company's policies referred to in Appendix A hereto) in the business divisions of the Company or Russian business units.

1.2. This Procedure also stipulates the process for informing whistleblowers of the outcomes of reviewing their complaints/messages, reporting on the CTL performance, and responsibility for the Corporate Trust Line business process.

1.3. This Procedure applies to employees of the Company and Russian business units involved in the Corporate Trust Line business process (the "BP").

1.4. This Procedure shall be updated, including upon changes in the organisational structure of the Company's Head Office (if such changes can impact the roles of the BP participants), following discussions with stakeholders and based on recommendations of auditors and consultants that provide audit and advisory services relating to ESG standards, and of the Company's internal auditors.

1.5. General rules for documenting operations, managing document flow and document safekeeping at the Head Office are set out in the Document Management Guidelines for MMC Norilsk Nickel's Head Office and the Regulation on the Document Pooling and Archiving Procedure for MMC Norilsk Nickel's Head Office and internal documents of the Company's standalone business units (SBUs) or Russian business units governing document management and archive-keeping.

2. Business process specifications

2.1. This Procedure describes the sequence of actions as part of the BP. The key BP specifications are shown in Table 1:

Table 1: Key BP specifications

BP specifications	
1	2
Business process purpose	To provide the Management of the Company, SBUs and Russian business units with objective and reliable information about negative impacts on stakeholders and alleged human rights violations, including reasonable concerns of stakeholders, violations of the Company's policies, cases of abuse, theft, corruption, corporate fraud and other violations in a timely manner to ensure effective decision-making
Business process owner	Head of the Corporate Trust Line (the "CTL"), Monitoring and Review Office (the "MRO"), Internal Control Department (the "ICD")
Business process inputs	Complaint/message received from a person who has become aware of cases of negative impacts on stakeholders, abuse, theft, alleged human rights violations or other violations related to the activities of the Company and its Russian business units, regardless of how it has been received
Business process outputs	<ul style="list-style-type: none"> – Information containing decision-making recommendations on corrective actions, eliminating or preventing negative impacts, human rights violations, compensations and other remedies for business divisions of the Head Office (the "HO"), SBUs, internal control and risk management functions of Russian business units, the management of the Company and its Russian business units; – CTL reports prepared for the HO business divisions, SBUs, internal control and risk management functions of Russian business units, the management of the Company and its Russian business units; – information prepared for the management of the Company and its Russian business units about the identified violations to ensure effective decision-making and eliminate negative impacts on stakeholders, human rights violations and disruptions in production, economic and financial operations; – information prepared for the monitoring of incoming complaints/messages; – information for reporting on the subject matter of complaints/messages and results of reviewing the same; – report on the CTL performance for the Audit Committee of the Board of Directors
Position in the CPM hierarchy	[RM.1]: Internal Control and Risk Management [RM.1.4]: Grievance Mechanism management

3. Principles of the Corporate Trust Line

The principles underlying the CTL include:

3.1. 24/7 free access to the telephone lines 8-800-700-1941 and 8-800-700-1945 for persons possessing information about actual and potential negative impacts on stakeholders as a result of the activities of the Company / Russian business units, alleged human rights violations or other situations relating to the activities of the Company / Russian business units and causing reasonable concern of stakeholders, as well as information about abuse, theft or other violations. Information can also be sent by filling out a contact form on the CTL page on the Company's website. Messages can be sent by e-mail to: skd@nornik.ru.

3.2. All complaints/messages without exceptions are accepted and registered by the CTL Information System running on Microsoft SharePoint (the "CTL IS").

3.3. All complaints/messages shall be processed and considered except when:

- the information is not related to the activities of the Company and its Russian business units;
- the complaint/message is uninformative;
- the complaint/message is an advertisement;
- the complaint/message contains information about the private life of the employees of the Company and Russian business units and is unrelated to their work at the Company / Russian business units.

3.4. Guaranteed confidentiality and anonymity for persons contacting the CTL, including via the CTL webpage¹. If additional data from the whistleblower is required in order to take prompt action, their contact details (mobile phone number, e-mail address) may be provided to the Vice President for Corporate and Economic Security following approval by the Head of the Internal Control Department, Head Office of MMC Norilsk Nickel (ICD), of a written request from the Vice President for Corporate and Economic Security.

3.5. The whistleblower must provide their personal data if the complaint/message pertains to payroll payments or other payments made by the Company / Russian business units to the whistleblower.

3.6. Inadmissibility of attempts to establish the identity of the whistleblower that wishes to remain anonymous, exert administrative or psychological pressure on them or any other retaliatory discrimination after his/her complaint/message to the CTL, including when running checks.

3.7. Forwarding the whistleblower's claim of undue administrative or psychological pressure or any other retaliatory discrimination after his/her complaint/message to the CTL and when running checks to the Investigation and Economic Security Department of MMC Norilsk Nickel's Head Office (the "I&ESD").

3.8. Providing the whistleblower with information on complaint/message registration (provided the whistleblower has made their contact details available) and

¹CTL page on the Company's website:
https://www.nornikel.ru/sustainability/corporate-hotline/index.php?sphrase_id=3270351.

with results of complaint/message consideration (at the whistleblower's request and provided the whistleblower has made their contact details available).

3.9. Independent consideration of complaints/messages. Independent experts may be engaged to take part in consideration of complaints/messages, including at the whistleblower's request.

3.10. Timely, objective and unbiased consideration of all incoming complaints/messages, except for cases listed in clause 3.3 hereof, irrespective of the position and employment period of the employee with the Company or its Russian business units reported therein.

3.11. Reported employees of the Company / Russian business units shall not be involved in the investigation (except for an enquiry provided for by clause 3.13 hereof).

3.12. Reporting employees of the Company / Russian business units and other stakeholders shall not be involved in the investigation (except for an enquiry provided for by clause 3.13 hereof).

3.13. Where necessary, reported and reporting employees of the Company / Russian business units and other whistleblowers (provided they have given their consent) can be subject to an enquiry as part of the investigation, with such enquiry complying with all confidentiality and personal data processing requirements.

3.14. Timely, objective and unbiased consideration of complaints/messages regarding improper conduct by the commission established by the Company's Vice President for Human Resources or the head of the SBU or Russian business unit that was assigned the task of checking the complaint/message.

3.15. This Procedure shall not limit the stakeholder's/whistleblower's right to apply to law enforcement agencies, courts, and supervisory authorities.

4. Business process operation procedure and its participants

4.1. The BP participants (roles) are shown in Table 2:

Table 2: BP roles and participants

No.	Role	Performed by	Functions
1	2	3	4
1.	Whistleblower	Person contacting the CTL	<ul style="list-style-type: none"> – submits to the CTL a report (complaint/message) (in any form) containing information on an actual or potential issue relating to the activities of the Company and Russian business units and causing legitimate concern, as well as on negative impacts on stakeholders as a result of the activities of the Company / Russian business units, alleged human rights violations or other situations relating to the activities of the Company / Russian business units and causing reasonable concern of stakeholders, as well as information on abuse, theft or other violations in business divisions of the Company and Russian business units
2.	Head of the ICD	Head of the ICD	<ul style="list-style-type: none"> – approves the subject attribute of the complaint/message; – decides whether ICD employees will check the complaint/message; – decides on when work on handling the complaint/message is completed; – determines the procedure to assess information about violations committed by the Head of the CTL or its operator or employees of the ICD or Risk Management Service (the "RMS") (except for the Head of the ICD and the Head of the RMS) for materiality of risks arising for the Company / Russian business units, selection of the best form to check the complaint/message, and resolution of the conflict of interest; – decides whether to inform the management of the Company, SBUs and Russian business units about the identified negative impacts or violations to ensure effective decision-making and eliminate negative impacts for the stakeholders, human rights violations, and negative consequences for production, economic and financial operations; – approves reports on the CTL operation to inform the management of the Company and Russian business units and the Board of Directors' Audit Committee, arranges for the preparation of anonymised information on subject

No.	Role	Performed by	Functions
1	2	3	4
			<p>matters of complaints/messages and results of their consideration / corrective actions to make such information publicly available;</p> <ul style="list-style-type: none"> – makes sure that internal and external stakeholders are aware of the CTL operation and can access it
3.	Head of the CTL	Head of the Corporate Trust Line, MRO of the ICD	<ul style="list-style-type: none"> – monitors the complaints/messages received, processed and registered in the CTL IS to make sure all the complaints/messages are duly registered; – assesses the information received for completeness, accuracy, relevance and value (usefulness), and for compliance with requirements set out in clause 3.3 hereof; – assigns to the complaint/message the status "Not subject to consideration"; – informs the Head of the ICD of new complaints/messages; – assigns the subject attribute of the complaint/message in consultation with the Head of the ICD; – sends requests for checks (along with a request for an independent expert review should the whistleblower ask for such an expert review) to the HO business divisions, the Company's SBUs and Russian business units to whom the issues raised in the complaint/message are reserved; – decides on whether to take up / dismiss a complaint/message; – extends the checking period at the request of the head of the business division of the Company, SBU or Russian business unit that was assigned the task of checking the complaint/message; – analyses and assesses the findings of checks of complaints/messages performed by business divisions of the Company, SBUs or Russian business units; – requests materials, information, explanations and documents related to the circumstances stated in the complaints/messages in addition to reports on control and corrective actions from heads of business divisions, SBUs and Russian business units;

No.	Role	Performed by	Functions
1	2	3	4
			<ul style="list-style-type: none"> - develops proposals to the Head of the ICD on the discontinuation of the complaint/message consideration; - assigns status "Monitoring discontinued / Violation confirmed (partially confirmed)" or "Monitoring discontinued / Violation not confirmed"; - if so requested by the whistleblower, sends a request for organising an independent expert review to the unit of the Company / Russian business unit responsible for the complaint/message consideration and informs the Sustainable Development Department about the whistleblower's request to organise an independent expert review; - if so requested by the whistleblower, coordinates a draft response on the results of the complaint/message consideration and proposals on corrective actions with the Company's business division, SBU / Russian business unit that was assigned the task of checking the complaint/message; - informs the Head of the ICD about the complaint/message check findings, their assessment, additional materials considered, and findings of the independent expert review, and proposes the complaint/message handling completion status; - develops proposals on corrective actions based on expert opinion of the Company's HO business divisions; - initiates the collection of feedback and monitors whistleblower satisfaction levels based on the Complaint/Message Consideration Feedback Forms received from whistleblowers (Appendix F hereto); - informs the Head of the ICD about complaints/messages on violations committed by the Head of the CTL or CTL operator or the employees of the ICD or the RMS; - informs the Vice President for Internal Control and Risk Management of complaints/messages on violations committed by the Head of the ICD or Head of the RMS; - informs the Company's President of complaints/messages about violations committed by the Vice President for Internal Control and Risk Management; - prepares reports on the effectiveness and results of complaint/message consideration and the overall performance of the CTL for the Board of Directors'

No.	Role	Performed by	Functions
1	2	3	4
			<p>Audit Committee, HO business divisions, the Company's SBUs, internal control and risk management functions of Russian business units, the Company's management, and Russian business units;</p> <ul style="list-style-type: none"> - sends approved reports on the CTL effectiveness and performance to the management of the Company, SBUs and Russian business units, information on identified impacts or violations to ensure effective decision-making and eliminate negative impacts on stakeholders and human rights violations, as well as negative consequences for production, economic and financial operations; - takes part in holding public consultations to build trust in the complaint/message consideration procedure
4.	CTL Operator	Manager / Chief Manager, MRO of the ICD	<ul style="list-style-type: none"> - receives, registers, additionally processes complaints/messages (collects additional information in available IT systems of the Company and from external sources); - requests additional documents, information and explanations related to the circumstances stated in the complaint/message in writing or orally, from whistleblowers (provided the whistleblower has made their contact details available); - prepares a complaint/message summary; - sends requests to check complaints/messages to the business divisions of the Company or Russian business units; - enters an extension of the check period in the CTL IS based on information from the Head of the CTL; - updates the whistleblower on the registration (provided the whistleblower has made their contact details available) and results of the complaint/message consideration and implementation of corrective actions (at the whistleblower's request and provided the whistleblower has made their contact details available); - makes the findings of the independent expert review available to the whistleblower; - requests, receives from the whistleblower and processes feedback on complaint/message consideration and on the whistleblower's satisfaction level

No.	Role	Performed by	Functions
1	2	3	4
			<p>(provided the whistleblower has made their contact details available and is available for contact);</p> <ul style="list-style-type: none"> – creates backup folders for complaints/messages in the CTL IS;
5.	Company business division, SBU or Russian business unit that was assigned the task of checking the message	Head of an HO business division of the Company, SBU or Russian business unit	<ul style="list-style-type: none"> – receives a request from the CTL; – checks the information contained in the complaint/message; – sends a request to the ICD to extend the period needed to fulfil the request of the Head of the CTL, stating the reasons for such a request; – provided the whistleblower gives their consent, requests and receives additional information from the whistleblower; – sends a request to the Sustainable Development Department to engage independent experts, and should the whistleblower request/approve the mediation process, coordinates with the whistleblower to arrange for unbiased fact checking, as well as for the purpose of explaining and approving the corrective actions discussed as part of the mediation effort; – develops a draft response to the whistleblower in cases when the whistleblower is to be provided with information on the results of the complaint/message consideration following checks (at the whistleblower's request and provided the whistleblower has made their contact details available) and sends it to the CTL; – submits to the CTL the findings from checking the complaint/message with documents attached (including an objective report on the findings based on the mediation process); – approves potential independent experts put forward by the Sustainable Development Department; – coordinates with the whistleblower (should the whistleblower request/approve the mediation process) as part of the mediation process to arrange for unbiased fact checking, as well as for the purpose of explaining and approving the corrective actions discussed with the independent experts as part of the mediation effort;

No.	Role	Performed by	Functions
1	2	3	4
			<ul style="list-style-type: none"> – develops and performs corrective actions, including based on recommendations of independent experts (if necessary)
6.	I&ESD	Vice President for Corporate and Economic Security	<ul style="list-style-type: none"> – receives a request or information from the CTL; – perform checks in case of information received from the CTL on undue administrative or psychological pressure or any other retaliatory discrimination of the whistleblower after his/her complaint/message to the CTL and when running checks pursuant to clause 3.7 hereof; – submits a report on the findings of the check of information contained in the complaint/message to the Internal Control and Risk Management Unit;
7.	Sustainable Development Department	Head of the Sustainable Development Department	<ul style="list-style-type: none"> – maintains a database of independent experts with a proven track record in business affairs and human rights, effective communication and mediation skills and competencies, and an established reputation in the community of independent experts; – sends a list of potential independent experts to the HO business division / the Company's SBU / Russian business unit responsible for the complaint/message consideration; – arranges for contracting independent experts in line with the Company's regulations and guidelines governing contracting and procurement; – develops terms of reference for an independent expert review of the complaint/message; – procures the findings of the independent expert following the complaint/message review and mediation; – submits the independent expert review materials to the Vice President for Internal Controls and Risk Management

4.2. BP operation procedure (sequence) and attributes are shown in Table 3:

Table 3: BP operation procedure (sequence) and attributes

N	Action	Description	Input	Output	Performed by	Deadline	Reference to the Appendix or corporate document
1	2	3	4	5	6	7	8
1.	Complaint/message receipt and registration in the CTL IS, whistleblower follow-up						
1.1	Receiving, processing (collecting additional materials on the complaint/message subject) and registering the complaint/message in the CTL IS	<ul style="list-style-type: none"> The CTL complaint/message submission channels shall include a telephone line with an answering machine and call recording hardware, e-mail and other means of information exchange (complaints/messages in hard copy, external (removable) media); complaints/messages submitted during the working hours from 9:00 am to 6:00 pm Moscow time shall be handled by the CTL operator, and those submitted outside of the working hours shall be automatically recorded by the answering machine; the answering machine greeting shall be as follows: "Hello! Welcome to the Corporate Trust Line of Norinickel Group. If you have information to report about any adverse impacts or alleged violations of human rights and the rights of other stakeholders, abuse, theft or other violations in the Company, please inform the operator or leave your message on the answering machine after hearing a sound signal. All conversations with the operator are recorded. Your voice message on the answering machine should not exceed five minutes. If you want to be updated on the results, please provide your contact details. Thank you for contacting the Corporate Trust Line."; 	Complaint/message received	Complaint/message registered in the CTL IS, backup folder created containing materials provided by the whistleblower and additional materials on the complaint/message subject retrieved from open sources or the systems of the Company / Russian business units	CTL Operator Head of the CTL	Within three (3) business days from the date of the complaint/message receipt	

N	Action	Description	Input	Output	Performed by	Deadline	Reference to the Appendix or corporate document
1	2	3	4	5	6	7	8
		<ul style="list-style-type: none"> – incoming complaints/messages shall be registered by the CTL operator in the CTL IS after preliminary assessment; – audio recorded complaints/messages, e-mails and other documents received by the CTL operator as part of additional data collection using the Company's information resources shall be stored in the CTL IS for ten (10) years; – the deadline for registering the received complaints/messages in the CTL IS and collecting additional information shall not exceed three (3) business days from the date of the complaint/message receipt; – the Head of the CTL shall monitor the complaints/messages received, processed and registered in the CTL IS to make sure all the complaints/messages are duly registered 					
1.2	Assessing the information received for completeness, accuracy, relevance and value (usefulness)	<ul style="list-style-type: none"> – Upon receipt of a complaint/message meeting the criteria set out in clause 3.3 hereof or a complaint/message that omits or lacks data necessary to initiate a check, the Head of the CTL shall assign it the status "Not subject to consideration"; – the Head of the CTL shall inform the Head of the ICD about the complaints/messages received by the CTL and assessment results of the complaints/messages received; – the Head of the CTL shall initiate a check of information contained in the complaint/message; 	Complaint/message registered in the CTL IS	<p>The list of complaints/messages that meet the criteria set out in clause 3.3 hereof and have been finalised;</p> <p>complaint/message summary;</p> <p>complaint/message check request (memo in case of the HO business divisions and the Company's SBUs or letter in case of Russian business units);</p>	Head of the CTL Head of the ICD CTL Operator	Within two (2) business days from the date the complaint/message is registered in the CTL IS	Appendix D hereto Appendix E hereto

N	Action	Description	Input	Output	Performed by	Deadline	Reference to the Appendix or corporate document
1	2	3	4	5	6	7	8
		<ul style="list-style-type: none"> – the description of the complaint/message and additional data obtained using the Company's information resources shall be included by the CTL operator in the complaint/message summary template attached hereto as Appendix D; – using a brief complaint/message description, the Head of the CTL shall in coordination with the Head of the ICD assign it a subject attribute in accordance with Appendix E; – the Head of the CTL shall use this attribute to send requests for checks (along with a request for an independent expert review² should the whistleblower ask for such an expert review) to the HO business divisions, the Company's SBUs and Russian business units to whom the issues raised in the complaint/message are reserved; – the CTL operator shall send requests for checks through the corporate document automatic management and control system of Nor Nickel Group (CDAMCS); – if the request for a check contains information included in the list of the Company's commercial secrets, the CTL operator shall send it through the CDAMCS, in which case it is classified as a commercial secret and marked 		information for the HO business division, the Company's SBU or Russian business unit to whom the issue raised in the complaint/message applies			

²The procedure for engaging independent experts is set out in clause [2.2](#) of Table 3 hereof.

N	Action	Description	Input	Output	Performed by	Deadline	Reference to the Appendix or corporate document
1	2	3	4	5	6	7	8
		<p>accordingly, or through secure communication channels;</p> <p>– the deadline for assigning a subject attribute to the complaint/message and sending requests for checks to the HO business divisions, the Company's SBUs and Russian business units shall not exceed two (2) business days from the date the complaint/message is registered in the CTL IS;</p> <p>where urgent checks are required (violations of OHS requirements, theft of assets, operation of tailing dumps), the information (an audio file / electronic document / summary) shall be sent by the Head of the CTL to the HO business divisions, the Company's SBUs / Russian business units within one (1) business day. Information on the operation of tailing dumps is additionally sent to the Senior Vice President – Operational Director</p>					
1.3	Following up with the whistleblower	The CTL operator shall forward to the whistleblower (provided the CTL operator has the whistleblower's contact details) a confirmation of the complaint/message registration, information on the standard complaint/message consideration time and/or a decision to take up / dismiss their complaint/message	Complaint/message registered in the CTL IS	Feedback sent to the whistleblower (provided the CTL operator has the whistleblower's contact details)	CTL Operator	Within one (1) business day from the date of the complaint/message registration	
2.	Information handling						

N	Action	Description	Input	Output	Performed by	Deadline	Reference to the Appendix or corporate document
1	2	3	4	5	6	7	8
2.1	Checking the information contained in the complaint/message	<ul style="list-style-type: none"> The deadline for checking submitted complaints/messages by the HO business divisions, the Company's SBUs and Russian business units shall be ten (10) business days from the date of the ICD request; the I&ESD shall perform checks in case of information received from the CTL on undue administrative or psychological pressure or any other retaliatory discrimination of the whistleblower after his/her complaint/message to the CTL and when running checks pursuant to clause 3.7 hereof; the results shall be submitted to the CTL in the form of reports and/or reviews and/or any other reporting documents with relevant attachments; if any violations or deficiencies described in the complaint/message or violations of human rights are identified, the results shall include the list of corrective actions taken to eliminate the same; if more time for checking the complaint/message is required, the head of the HO business division, the Company's SBU or Russian business unit who is responsible for the requested complaint/message check shall request an extension of the check period from the ICD, stating the reasons for such request, prior to the expiry of the initial deadline. Further 	<p>complaint/message summary;</p> <p>complaint/message check request (memo in case of the HO business divisions and the Company's SBUs or letter in case of Russian business units)</p>	Letter/memo describing the complaint/message check findings	I&ESD Head of the Company's business division or SBU / Russian business unit that received the complaint/message check request	Within ten (10) business days from the date of the ICD request. If an extension of the check period is requested and approved by the Head of the CTL, within such new deadline	

N	Action	Description	Input	Output	Performed by	Deadline	Reference to the Appendix or corporate document
1	2	3	4	5	6	7	8
		<p>to such request, the Head of the CTL shall set an updated deadline for completing the check. The CTL operator shall update the check period in the CTL IS accordingly;</p> <ul style="list-style-type: none"> - heads of the HO business divisions, the Company's SBUs and Russian business units shall make sure that all requested complaint/message checks are carried out, corrective actions (where necessary) are developed and implemented, the complaints/messages are duly reconsidered upon the submission of an appeal by the whistleblower, and all and any explanations and materials requested by the CTL staff are provided; - in cases where fact checking is required, the responsible officers shall engage the whistleblower and independent experts to procure additional information and develop an unbiased report on the check findings following the mediation effort; - the head of the HO business division, the Company's SBU / Russian business unit who is responsible for the requested complaint/message check shall draft a response to be provided to the whistleblower and submitted to the CTL; - by decision of the Head of the ICD, the information reported in the complaint/message may be checked by employees of the ICD in line with the ICD's remit 					

N	Action	Description	Input	Output	Performed by	Deadline	Reference to the Appendix or corporate document
1	2	3	4	5	6	7	8
2.2	Handling complaint/message check findings. Analysing and assessing the complaint/message check findings	<ul style="list-style-type: none"> The Head of the CTL shall analyse and assess the findings following the checks performed by the HO business divisions, the Company's SBUs / Russian business units, and shall draft proposals on corrective actions; if the available supporting documents are insufficient, there are signs pointing to deficiencies in the checking process, or no information is provided as to corrective action taken for any violations identified, the Head of the CTL shall request further materials and explanations required in addition to the findings of completed control and corrective actions; the Head of the CTL shall inform the Head of the ICD about the complaint/message check findings, their assessment, additional materials considered, and propose to complete the complaint/message consideration; the Head of the ICD shall consider the obtained materials and reports (reviews) on check findings as well as additional materials and explanations to decide on the discontinuation of the complaint/message consideration; based on the decision taken by the Head of the ICD, the Head of the CTL shall change the complaint/message status to either "Monitoring discontinued / Violation confirmed (partially confirmed)" or "Monitoring discontinued / Violation not confirmed"; 	Letter/memo describing the complaint/message check findings	Complaint/message handling completion report created in the CTL IS	Head of the CTL Head of the ICD Sustainable Development Department Head of the Company's business division, SBU or Russian business unit that received the message check request	Within five (5) business days upon receiving the complaint/message check findings and materials and explanations required in addition to the findings of completed control actions	(Appendix F hereto)

N	Action	Description	Input	Output	Performed by	Deadline	Reference to the Appendix or corporate document
1	2	3	4	5	6	7	8
		<ul style="list-style-type: none"> the CTL operator shall update the whistleblower on the results using the contact details provided by the whistleblower; the Head of the ICD decides whether to inform the management of the Company's JVs, SBUs and Russian business units about the identified negative impacts or violations to ensure effective decision-making and develop corrective actions to eliminate negative impacts for the stakeholders, human rights violations, and negative consequences for production, economic and financial operations; should the whistleblower additionally request an independent expert review, the Head of the CTL shall forward the expert review request to the HO business division, the Company's SBU / Russian business unit responsible for the complaint/message consideration; the Head of the CTL shall inform the Sustainable Development Department about the whistleblower's request for an independent expert review; upon receipt of a request for an independent expert review, the head of the HO business division, the Company's SBU / Russian business unit responsible for the complaint/message consideration shall contact the Sustainable Development Department by sending it a request for the engagement of independent experts and further cooperate with the Sustainable 					

N	Action	Description	Input	Output	Performed by	Deadline	Reference to the Appendix or corporate document
1	2	3	4	5	6	7	8
		<p>Development Department on matters related to such engagement;</p> <ul style="list-style-type: none"> – based on the database of independent experts with a proven track record in business affairs and human rights, effective communication and mediation skills and competencies, and an established reputation in the community of independent experts, the Sustainable Development Department shall send proposals on potential independent experts to be engaged and relevant employees of the HO business division, the Company's SBU / Russian business unit that received the complaint/message check request to the HO business division, the Company's SBU / Russian business unit responsible for the complaint/message consideration; – after receiving an approval of the proposed independent experts³ from the HO business division, the Company's SBU / Russian business unit responsible for the complaint/message consideration, the Sustainable Development Department shall follow the steps described in the Company's regulations and guidelines governing the contracting and 					

³An independent expert participating in the independent expert review of a complaint/message is selected pursuant to the Company's procurement regulations and guidelines. If the Company's procurement regulations and guidelines prescribe the application of competitive procurement procedures, approval of the list of candidates by the HO business division, the Company's SBU / Russian business unit responsible for the complaint/message consideration becomes advisory rather than mandatory.

N	Action	Description	Input	Output	Performed by	Deadline	Reference to the Appendix or corporate document
1	2	3	4	5	6	7	8
		<p>procurement of independent expert review services;</p> <ul style="list-style-type: none"> – the Sustainable Development Department shall develop terms of reference for the experts participating in the independent expert review of the complaint/message; – should the whistleblower request/approve the mediation process, the relevant HO business division, the Company's SBU / Russian business unit shall contact the whistleblower for unbiased fact checking, as well as for the purpose of explaining and approving the corrective actions discussed with the independent experts as part of the mediation effort; – the Sustainable Development Department shall procure the findings of the independent expert following the complaint/message review and mediation; the Sustainable Development Department shall submit the independent expert review materials to the Vice President for Internal Control and Risk Management; – the Head of the CTL shall inform the Head of the ICD about the complaint/message check findings, their assessment, additional materials considered, and findings of the independent expert review, and propose the complaint/message handling completion status; – the CTL operator shall make the findings of the independent expert review 					

N	Action	Description	Input	Output	Performed by	Deadline	Reference to the Appendix or corporate document
1	2	3	4	5	6	7	8
		<p>available to the whistleblower (provided the CTL operator has the whistleblower's contact details);</p> <ul style="list-style-type: none"> the CTL operator shall ask the whistleblower (provided the CTL operator has the whistleblower's contact details) about their satisfaction with the complaint/message review by sending a Complaint/Message Consideration Feedback Form (Appendix F hereto); the Head of the CTL shall collect feedback and monitor whistleblower satisfaction levels based on the Complaint/Message Consideration Feedback Forms received from whistleblowers 					
3.	Assessment and processing of information regarding reported violations committed by employees of the Internal Control and Risk Management Unit						
3.1	Handling information about violations committed by the Head of the CTL or its operator or employees of the Internal Control Department or the Risk Management Service (except for the Head of the ICD and the Head of RMS)	<ul style="list-style-type: none"> Within one (1) business day from the receipt a complaint/message on violations committed by the Head of the CTL or the CTL operator or the employees of the ICD or the RMS (except for the Head of the ICD and the Head of RMS), the Head of the CTL shall inform the Head of the ICD of such complaint/message in writing; the procedure for assessing complaints/messages with respect to the materiality of risks arising for the Company and selecting the most appropriate form to be used to check the reported information and resolve the 	Complaint/message from the whistleblower registered in the CTL IS	Report on the findings	Head of the CTL	Within fifteen (15) business days from the date the complaint/message is received	

N	Action	Description	Input	Output	Performed by	Deadline	Reference to the Appendix or corporate document
1	2	3	4	5	6	7	8
		conflict of interest shall be determined by the Head of the ICD;					
3.2	Handling information about violations committed by the Head of the ICD or the Head of the Risk Management Service	<ul style="list-style-type: none"> - Within one (1) business day from the receipt a complaint/message on violations committed by the Head of the ICD or the Head of the RMS, the Head of the CTL shall inform the Vice President for Internal Control and Risk Management of such a complaint/message in writing; - the procedure for assessing complaints/messages with respect to the materiality of risks arising for the Company / Russian business units and selecting the most appropriate form to be used to check the reported information and resolve the conflict of interest shall be determined by the Vice President for Internal Control and Risk Management 	Complaint/message from the whistleblower registered in the CTL IS	Report on the findings	Head of the CTL	Within fifteen (15) business days from the date the complaint/message is received	
3.3	Handling information about violations committed by the Vice President for Internal Control and Risk Management	<ul style="list-style-type: none"> - The Head of the CTL shall inform the Company's President of such complaint/message in writing within one (1) business day from the receipt thereof; - the procedure for assessing complaints/messages with respect to the materiality of risks arising for the Company and selecting the most appropriate form to be used to check the reported information and resolve the 	Complaint/message from the whistleblower registered in the CTL IS	Report on the findings	Head of the CTL	Within fifteen (15) business days from the date the complaint/message is received	

N	Action	Description	Input	Output	Performed by	Deadline	Reference to the Appendix or corporate document
1	2	3	4	5	6	7	8
		conflict of interest shall be determined by the Company's President					
4.	CTL reporting						
4.1	CTL reporting	<ul style="list-style-type: none"> At the request of the head of the HO business division, the Company's SBU, Russian business unit, or the internal control and risk management function of a Russian business unit submitted to the Head of the ICD, the Head of the CTL shall within fifteen (15) business days prepare draft reports on the CTL operation and submit the same to the Head of the ICD for approval; the Head of the ICD shall approve the said draft reports within three (3) business days; the Head of the CTL shall submit reports on the CTL operation approved by the Head of the ICD to the management of the Company and Russian business units; the Head of the ICD shall submit reports on the CTL operation to the Audit Committee of the Company's Board of Directors in accordance with its meeting schedule; if the Head of the ICD so decides, the Head of the CTL shall inform the management of the Company, SBUs and Russian business units on identified impacts or violations to ensure effective decision-making and eliminate negative 	Complaint/message handling completion report created in the CTL IS	<p>CTL reports prepared for the HO business divisions, the Company's SBUs, the internal control and risk management functions of Russian business units, the management of the Company and its Russian business units;</p> <p>information prepared for the management of the Company and its Russian business units about the identified violations to ensure effective decision-making and eliminate adverse impacts on stakeholders, human rights violations, and negative effects on production, economic and financial operations;</p> <p>information prepared for the monitoring of incoming complaints/messages;</p> <p>report on the CTL operation for the Audit</p>	Head of the CTL Head of the ICD	Within twenty-five (25) calendar days after the end of the reporting period	

N	Action	Description	Input	Output	Performed by	Deadline	Reference to the Appendix or corporate document
1	2	3	4	5	6	7	8
		<p>impacts on stakeholders and human rights violations, as well as negative consequences for production, economic and financial operations;</p> <p>– every year, the Head of the ICD shall submit reports on the CTL operation, including information on the subject matter of complaints/messages, whistleblower feedback (reviews) and the results of the complaint/message consideration (in anonymised form), for the purposes of drafting the Sustainability Report of Norilsk Nickel Group. Special attention is paid to complaints/messages from stakeholders:</p> <ul style="list-style-type: none"> ✓ regarding risks associated with the supply chain and described in Supplement II of the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas; ✓ regarding freedom of association; ✓ regarding human rights violations in local communities; ✓ regarding indigenous rights (including information submitted by independent experts); <p>– every year, the Head of the ICD shall submit reports on the CTL operation for the purposes of drafting the Annual Report of MMC Norilsk Nickel and make arrangements for the preparation of anonymised information on the received complaints/messages and results of their</p>		<p>Committee of the Board of Directors;</p> <p>information for reporting on the subject matter of complaints/messages and results of reviewing the same;</p> <p>information containing decision-making recommendations on corrective actions eliminating or preventing negative impacts, human rights violations, compensations and other remedies for the HO business divisions, SBUs, the internal control and risk management functions of Russian business units, the management of the Company and its Russian business units</p>			

N	Action	Description	Input	Output	Performed by	Deadline	Reference to the Appendix or corporate document
1	2	3	4	5	6	7	8
		consideration / corrective actions to make such information publicly available					

5. Key performance indicators of the business process

5.1. The key performance indicators of the business process are shown in Table 4:

Table 4. Key Performance Indicators for the BP

No.	Indicator	Unit of measurement	Indicator description, calculation formula	Information source, reporting document
1	2	3	4	5
1.	Timely processing of the complaints/messages received	%	<p>Compliance with the standard deadlines for processing complaints/messages.</p> <p>The ratio of complaints/messages processed within the standard deadline to the total number of complaints/messages received.</p> <p>Indicator value 100%</p>	CTL IS, report on CTL operation for the reporting period
2.	Quality processing of complaints/messages approved for further handling (number of refusals to check the complaint/message)	%	<p>Identification of the complaint/message subject matter by violation type and assignment of the complaint/message to the relevant function.</p> <p>The ratio of complaint/message checks performed by the Company's business divisions, SBUs and Russian business units that were assigned the complaint/message check request (excluding refusals to check a complaint/message due to incorrect identification of the violation type or misassignment of the business division, SBU or Russian business unit) to the total number of complaints/messages received.</p> <p>Indicator value 100%</p>	CTL IS, materials for the check findings, report on CTL operation for the reporting period
3.	Timely submission of reports on CTL operation to the relevant stakeholders	%	<p>Compliance with the established CTL operation reporting deadlines (providing information to the management of the Company, SBUs and Russian business units on CTL operation). The ratio of the number of reports drafted and submitted in due time to the total number of reports.</p> <p>Indicator value 100%</p>	CTL IS, report on the CTL operation with a breakdown by complaint/message subject matters and business divisions for the reporting period

6. Business process risks

6.1. The risks of the BP are shown in Table 5:

Table 5: BP risks

No.	Control objective	Risks	Control Procedures
1	2	3	4
1.	Submitting complete, correct or reliable information on identified cases of abuse, theft or other violations to the management of the Company / SBUs / Russian business units	<ul style="list-style-type: none"> – Failure to register a complaint/message received via one of the communication channels in the CTL IS; – assignment of a wrong subject attribute to a complaint/message; – assessment of the control action findings by business divisions / SBUs / Russian business units is erroneous, contains no supporting documents or such documents do not corroborate the findings; no corrective action taken to redress (resolve) the incident (situation, violation); – assignment of an inappropriate complaint/message handling completion status ("confirmed (partially confirmed)" / "not confirmed") 	<ul style="list-style-type: none"> – The Head of the CTL shall audit the number of complaints/messages received, processed and registered in the CTL IS once every three (3) business days; – the Head of the ICD shall approve the subject attribute of the complaint/message – the Head of the ICD shall oversee the completed analysis and assessment of the findings of the control actions performed by the Company's business divisions, SBUs or Russian business units; – the Head of the CTL shall analyse and assess the findings of the complaint/message checks performed by business divisions of the Company, SBUs or Russian business units; – the Head of the CTL shall submit a decision on completion of handling the complaint/message to the Head of the ICD for approval

7. CTL IS access rights

7.1. Full access rights to the CTL IS are reserved to the Heads of the ICD and the CTL.

7.2. The right to register incoming complaints and messages in the CTL IS and prepare requests is reserved to the operator and the Head of the CTL.

7.3. The right to view backup folders in the CTL IS is reserved to the Head of the MRO of the ICD.

7.4. The CTL information resources are the Company's property, with access rights and use procedures determined by the Head of the ICD.

8. Responsibility

8.1. The Head of the CTL of the MRO of the ICD shall be responsible for inadequate control of, or failure to control compliance herewith.

8.2. The Head of the CTL of the MRO of the ICD shall be responsible for failure to introduce amendments and changes hereto in a timely manner.

8.3. All BP participants shall be responsible for failure to respect the confidentiality and anonymity of the CTL whistleblowers (except as stipulated by clause 3.5 hereof).

Appendix A

Regulatory References

This Procedure shall refer to the following corporate and other regulatory documents:

No. 197-FZ dated 30 December 2001 Labour Code of the Russian Federation

Minutes of the Board of Directors PJSC MMC Norilsk Nickel's Anti-Corruption
No. GMK/31-pr-sd dated 18 September 2017 Policy

Minutes of the Board of Directors PJSC MMC Norilsk Nickel's Responsible Sourcing
No. GMK/30-pr-sd dated 07 October 2021 Policy

Minutes of the Board of Directors PJSC MMC Norilsk Nickel's Stakeholder
No. GMK/36-pr-sd dated 29 November 2021 Engagement Policy

Minutes of the Board of Directors PJSC MMC Norilsk Nickel's Human Rights Policy
No. GMK/36-pr-sd dated 29 November 2021

Minutes of the Board of Directors PJSC MMC Norilsk Nickel's Freedom of
No. GMK/36-pr-sd dated 29 November 2021 Association Policy

Minutes of the Board of Directors PJSC MMC Norilsk Nickel's Local Community
No. GMK/36-pr-sd dated 29 November 2021 Engagement Policy

Minutes of the Board of Directors PJSC MMC Norilsk Nickel's Indigenous Rights
No. GMK/36-pr-sd dated 29 November 2021 Policy

Minutes of the Board of Directors PJSC MMC Norilsk Nickel's Tailings Management
No. GMK/36-pr-sd dated 29 November 2021 Policy

Minutes of the Board of Directors PJSC MMC Norilsk Nickel's Business Ethics Code
No. GMK/35-pr-sd dated 18 December 2020

Minutes of the Board of Directors PJSC MMC Norilsk Nickel's Supplier Code Of
No. GMK/30-pr-sd dated 07 October 2021 Conduct

P GO 42-004-2019 Regulations on Preparing Records and
Managing Archives at the Head Office of MMC
Norilsk Nickel

P GMK-NN 112-004-2015 Regulations on the Prevention and
Management of Conflicts of Interest at MMC
Norilsk Nickel

Procedures on the Corporate Trust Line PJSC MMC Norilsk Nickel	PBP GK NN RM.1.4-2023
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PSP GO 47-001-2020	Regulations on the Internal Control Department
I GO 42-003-2019	Document Management Guidelines for the Head Office of MMC Norilsk Nickel
M NN RM.1.3-2024	MMC Norilsk Nickel Methodology for Identifying, Analysing, Assessing and Monitoring Regulatory Risk Related to Combating Insider Information Unlawful Use and Market Manipulation and Counteracting the Legalization (Laundering) of Proceeds of Crime, the Financing of Terrorism and Spread of Weapons of Mass Destruction
M NN CS.1.1-2024	Methodology for Managing Information Qualifying as a Trade Secret at MMC Norilsk Nickel

Appendix B

Abbreviations

BP	The Corporate Trust Line business process
HO	Head Office of PJSC MMC Norilsk Nickel
ICD	Internal Control Department, MMC Norilsk Nickel's Head Office
I&ESD	Investigation and Economic Security Department, MMC Norilsk Nickel's Head Office
Stakeholders	Individuals, legal entities, groups, associations and other parties external to the Company / Russian business units whose interests can be potentially affected by the Company's / Russian business units' activities, as well as parties that can influence them
Whistleblower	Person (including internal and external stakeholders) who contacts MMC Norilsk Nickel's Corporate Trust Line
CTL IS	CTL Information System based on Microsoft SharePoint software
CDAMCS	Corporate document automatic management and control system of Nor Nickel Group
Company	PJSC MMC Norilsk Nickel
Control actions	Control procedures ensuring reasonable assurance that complaints or messages submitted to MMC Norilsk Nickel's Corporate Trust Line are effectively handled
Corrective actions	Actions to eliminate negative impacts and consequences of violations, compensation, and other remedies to reimburse (or cooperate in order to reimburse) the damage arising from any negative impacts on stakeholders as a result of the activities of MMC Norilsk Nickel / Russian business units, human rights violations or other situations/violations/abuses related to the activities of MMC Norilsk Nickel / Russian business units
Independent expert	Third party engaged to independently assess the facts and provide access to remedies
Urgent checks	Issues requiring prompt check of the whistleblower's information (information about wrongdoing carrying a threat to people's life or health, production safety and operations, etc.)
SBU	MMC Norilsk Nickel's standalone business unit: branch / representative office
CTL Operator	Employees of the Monitoring and Review Office, Internal Control Department, MMC Norilsk Nickel's Head Office

Procedures on the Corporate Trust Line PJSC MMC Norilsk Nickel		PBP GK NN RM.1.4-2023
Checks	Control actions taken to check complaints and messages received via MMC Norilsk Nickel's Corporate Trust Line	
Russian business units	Russian organisations within the corporate structure that are part of Norilsk Nickel Group	
Head of the CTL	Head of the Corporate Trust Line, Monitoring and Review Office, Internal Control Department, MMC Norilsk Nickel's Head Office	
CTL	MMC Norilsk Nickel's Corporate Trust Line	
MRO	Monitoring and Review Office, Internal Control Department, MMC Norilsk Nickel's Head Office	

Appendix C

Terms and definitions

The following terms (as defined below) are used herein:

Business process owner	the Head of the Company or the head of the Company's division responsible for establishing the hierarchy, parameters and rules for the business process, achieving the business process's KPI targets, identifying and analysing business process risks in a timely manner, ensuring efficient implementation of control procedures aimed at mitigating business process risks, and having the resources and authority to manage and improve (optimise) the business process
Head office	MMC Norilsk Nickel's territorial business division with offices in Moscow, St Petersburg and Norilsk whose organisational structure was approved by the mandate of MMC Norilsk Nickel's President
Nornickel Group	MMC Norilsk Nickel and the entirety of operations forming Nornickel Group
Discrimination	violation of the rights, freedoms and legitimate interests of a person and citizen, based on gender, race, skin colour, nationality, language, ethnicity, property, family, social or official status, age, place of residence, attitude to religion, beliefs, membership or non-membership in public associations or any social groups
Complaint/message	report containing information on a current or potential issue pertaining to the Company's and Russian business units' activities and raising a legitimate concern, as well as on an adverse impact on the Company's / Russian business units' stakeholders and employees, violation of human rights, protection of assets and corporate interests, prevention of abuse, theft, and other violations (including of the Company's policies set out in Appendix A hereto) at the Company / Russian business units
Information	information (messages, data) irrespective of the form it is presented in
CTL Information System (CTL IS)	all information contained in the Microsoft SharePoint database and information technologies and technical means processing it
Conflict of interests	a situation in which personal interest (direct or indirect) of the Company's employee affects or may affect proper performance of his or her job duties, and in which a conflict between personal interests

	of the Company's employees and the rights and legitimate interests of the Company arises or may arise, which could result in damage to the interests of the Company
Mediation	method of alternative dispute resolution based on finding a mutually acceptable solution through the intermediary efforts of an impartial third party (independent expert)
Personal Data	any information relating to a directly or indirectly identified or identifiable natural person (personal data subject)
Pre-conflict situation	a situation in which the members of the Board of Directors or the Management Board of the Company, the Company's employees or representatives while performing their official or professional duties may have personal interest that could lead to a conflict of interest
Head of the Company	President, First Vice President, Senior Vice President, Vice President, managers reporting directly to the President of the Company
Head of Russian business unit	CEO of a Russian business unit, Director of a Russian business unit or Rector of a Russian business unit
Internal Control System	<p>a combination of organisational processes, policies and guidelines, control procedures, corporate culture principles and actions taken by the internal control entities to provide reasonable assurance that the Company will achieve:</p> <ul style="list-style-type: none"> - effectiveness and efficiency of its business; - reliability and validity of its corporate financial statements and management reporting; – compliance with the applicable laws and the Company's internal regulations
MMC Norilsk Nickel's Corporate Trust Line	activities to ensure the receipt and processing of complaints and messages from the employees of the Company and its Russian business units or external stakeholders on the protection of assets and corporate interests, prevention of abuse, theft and other violations, which fall within the remit of the Internal Control Department of MMC Norilsk Nickel's Head Office
Message summary	a written document summarising the complaint or message received via the CTL as regards completeness, accuracy, relevance and value (usefulness) of information, and containing

additional information obtained using the Company's automated resources

Business Unit

the Company's business unit responsible for specific processes, functions or works that participates in the Company's operations but is not a standalone entity within the Company

Settlement of conflict of interest

the implementation of measures and initiatives aimed at resolving pre-conflict situations and/or conflicts of interest

Appendix D**Complaint/message summary template**

No.	Classifier	Value
1	Message number	
2	Date and time of complaint/message receipt	
3	Communication channel	
4	Whistleblower	
5	Whistleblower contact information (if provided)	
6	Business division of the Company, branch, representative office or Russian business unit where a violation/attempt/intent has been recorded according to the whistleblower's complaint/message	
7	Classification of the impact from violation/attempt/intent	
8	Detailed description of the violation/attempt/intent	
9	Other details	
10	Decision by the Head of the CTL	
11	CTL Operator	
12	Head of the CTL	
13	Decision on the impact/violation/attempt/intent	

Appendix E**Classifier of complaints and messages received by the CTL**

Subject	Subject attribute, description of violation/attempt/intent
Remuneration and other payments to employees	Violation of the Russian labour laws and internal documents as regards payroll provisions (violations and mistakes related to payroll payments, violation of the validity of benefits and compensations related to working conditions, violations and mistakes in calculating deductions, violation of payment deadlines, etc.)
Social issues	Violation of the Company's / Russian business units' internal documents regulating the conditions for employee participation in social and corporate programmes, violations of terms of charitable programmes, etc.
Work relations	Breach of the information security policy, violation of the interaction procedure between business units when preparing reports and memos, violation of employee/vehicle search routines at the security gate. Inefficient use of the Company's / Russian business units' resources, inefficient monitoring of the safety of the Company's / Russian business units' property (violations of inventory or accounting procedures, deficiencies in the preparation of accounting documents, etc.)
Labour relations	Violation of regulatory and employment-related requirements (violation of the terms of the employment contract, failure to duly draw up / change work schedules, failure to schedule and maintain vacations, requiring employees to take on more duties than specified in their job descriptions, violation of the procedure to employ, transfer, dismiss employees, breach of job descriptions (failure to act, negligent attitude, etc.))
Production process, OHS requirements	Failure to comply with OHS, fire and environmental (emissions, footprint) safety requirements, violation of OHS and waste and tailings management regulations, standards, provisions, rules, failure to comply with the procedure and timely provide workers with personal protective equipment and tools, failure to monitor the condition of buildings, production facilities, equipment, etc.

Subject	Subject attribute, description of violation/attempt/intent
Commercial and contractual activities	Violation of the Company's / Russian business units' internal documents on procurement and contract execution procedures, violation of contract terms by the contractor/employee, contractor's conducting business in bad faith, etc.
Conflict of interest (pre-conflict situation)	Violation of the Company's / Russian business units' regulations on the prevention and management of pre-conflict situations and conflicts of interest
Combating insider information unlawful use and market manipulation	Unlawful use/distribution of insider information, non-compliance with the applicable laws and the Company's / Russian business units' internal documents as regards PUUIIMM, breaches of the procedure for maintaining the insider list, failure to comply with the procedure and timely disclose the issuer's inside information pursuant to article 8, part 1 of Federal Law No. 224-FZ, etc.
Acts of corruption	Actions showing signs of an administrative or criminal offence: bribery, abuse of power, commercial bribery or other illegal use by employees of their position against the legitimate interests of the Company / Russian Business Units in order to obtain benefits in the form of money, valuables or other property or property-related services, other property rights for themselves or for a third party or illegal provision of such a benefit to such person by other individuals, as well as acting in such a manner on behalf of or for the benefit of a legal entity
Theft	Attempted or completed encroachment on the Company's / Russian business units' tangible assets made by its employees or other persons, regardless of the form of such encroachment (theft, theft by deception or breach of trust (fraud), embezzlement, misappropriation, robbery, extortion, property damage, including wilful destruction or damage to property, motor vehicle theft, etc.), the amount and nature of damage caused
Corporate Fraud	Any and all profit-motivated criminal offences (or actions showing signs thereof) under Chapter 21 (Crimes against Property), Chapter 22 (Economic Crimes), Chapter 23 (Crimes against the Interests of Service in Commercial and Other Organisations) of the Russian Criminal Code committed by means of deception, breach of trust or abuse of office by the employees of Nor Nickel Group (internal corporate fraud) or third parties (external corporate fraud) that encroach on the property of Nor Nickel Group or cause damage to property. Illegal access to or disclosure of information qualifying as a

Subject	Subject attribute, description of violation/attempt/intent
	trade secret (article 183 of the Russian Criminal Code) and corruption-related crimes do not constitute corporate fraud ⁴
Ethics	Non-compliance with the Company's Business Ethics Code: Creation of a hostile work environment (unresolved conflicts; disrespect towards colleagues, managers and subordinates (abusive language, humiliation of honour and dignity, disrespect towards personal characteristics and opinion, etc.)), failure to observe morals and principles of equity when evaluating employees' professional abilities, knowledge and skills and establishing remuneration, benefits and compensations related to working conditions, administrative or psychological pressure on the whistleblower after his/her complaint or report to the CTL
Human rights and freedoms ⁵	Violation of freedom of association, human rights in local communities, indigenous rights, social, racial, national, age, religious, gender or other discrimination, violation of the right to the protection of family, maternity and childhood, right to privacy of correspondence, telephone conversations, postal, cable and other communications, dissemination of information about a person's private life without his/her consent, forced or child labour or other violations of internationally recognised human rights, which are understood to be at least those set out in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work
Responsible Sourcing ⁶	Concerns regarding the circumstances of extraction, trade, handling and export of natural resources and supply chains, including violations of human rights and MMC Norilsk Nickel's Responsible Sourcing Policy or Supplier Code of Conduct. Such concerns relate to the following risk categories under Supplement II of the OECD Guidance:

⁴ See List of Corruption-Related Crimes No. 23 (Ordinance by Russian Prosecutor General's Office No. 11/11, Ministry of Internal Affairs No. 11/11, Ministry of Internal Affairs No. 1 On the Introduction of Lists of Articles of the Russian Criminal Code Used for Statistical Purposes dated 17 January 2023).

⁵ If the subject matter of the complaint/message at the same time matches the attributes of "human rights and freedoms" and another subject specified in this appendix, the complaint/message qualifies as the other subject (rather than "human rights and freedoms").

⁶ This subject includes complaints and messages about violations made by employees of suppliers, contractors/subcontractors deployed at the Company's production facilities and rendering services to the Company / Russian business units in the processes of extraction, trade, handling, and exports, as well as raw materials supply chains.

Subject	Subject attribute, description of violation/attempt/intent
	<ul style="list-style-type: none"> – gross human rights violations associated with extraction, trade or handling of natural resources, including: <ul style="list-style-type: none"> ✓ any forms of abuse and cruel, inhuman or degrading treatment; ✓ any forms of forced or compulsory labour, i.e. work or services that a person does not voluntarily agree to or is coerced into on pain of punishment; ✓ the worst forms of child labour; ✓ human rights violations in the use of prison labour; ✓ other gross human rights violations and abuses such as sexual violence, which is widespread globally; – war crimes or other serious violations of international humanitarian law, crimes against humanity, or genocide; – direct or indirect support to non-state armed groups; – direct or indirect support to public or private security forces that illegally control mine sites, transportation routes and upstream actors in the supply chain; illegally tax or extort money or minerals at point of access to mine sites, along transportation routes or at points where minerals are traded; or illegally tax or extort intermediaries, export companies or international traders; – bribery and fraudulent misrepresentation of the origin of minerals; – money laundering; – non-payment of taxes, fees and royalties to governments

Appendix F**Complaint/Message Consideration Feedback Form
(whistleblower satisfaction assessment)**

1. Are you satisfied with the outcome of your complaint/message handling (has your issue been resolved)?

YES	Partially satisfied	NO
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Further comments:

--

2. Do you intend to re-submit your complaint/message (if you are partially satisfied or unsatisfied with the handling of your complaint)?

YES	NO	Hard to say
-----	----	-------------

Further comments

--

3. After receiving the results of complaint/message handling, will you apply to external control, supervisory or judicial bodies (if you are partially satisfied or unsatisfied with the handling of the complaint)?

YES	NO	Hard to say
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Further comments

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4. Was it difficult to find contact details for submitting complaints/messages (phone numbers, the Company's website, email)

NO	YES
----	-----

Further comments

--

5. How would you rate the interaction with CTL operators in the communication process
(if you had such interaction)

- 1 – unsatisfactory
- 2 – satisfactory
- 3 – good

Further comments

6. You can add your suggestions for improving the Corporate Trust Line