

HUMAN RIGHTS REPORT

Nornickel Group
2024



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About the Nornickel Group

The Norilsk Nickel Group (“Nornickel”, the “Group”, the “Nornickel Group”, or the “Company”) is a diversified metals and mining holding company, the world’s largest producer of palladium and metal nickel, and one of the leading global producers of platinum, copper, rhodium, and cobalt. Nornickel’s key competitive advantages include a vertically integrated production chain that spans a unique mineral resource base and a full production cycle, from ore mining to refining, along with its own energy, logistics, and infrastructure assets.

The Group’s production facilities are located in Russia, including in the Norilsk Industrial District, on the Kola Peninsula, in the Trans-Baikal Territory,

and in Finland. The Head Office of PJSC MMC NORILSK NICKEL (the Group’s parent company) is based in Moscow.

Nornickel holds leading positions among industrial companies operating in the Russian Arctic. The Company’s enterprises play a vital role in the development of Norilsk, Dudinka, Monchegorsk, and Zapolyarny, contributing to the social and economic development and stability of these cities.

About the Report

Nornickel plays a significant role in the social and economic development of its operating regions by creating jobs, building infrastructure, and implementing various initiatives to support local growth. However, the key factor driving the Company’s sustainable growth and success is the people living across Nornickel’s footprint. Working in the harsh climate of the Far North, Nornickel employees ensure uninterrupted production and bring ambitious projects to life. The hard work, professionalism, and dedication of its people lie at the heart of Nornickel’s achievements, driving the Company forward and securing its position as an industry leader.

Nornickel’s success would not be possible without a well-structured system that fosters respect for every individual involved in the Company’s operations. The Company fully acknowledges its responsibilities and upholds high social standards, placing particular emphasis on protecting labour rights, ensuring safe and comfortable working environment, and supporting the professional and personal growth of its people. Nornickel firmly believes that long-term success is only possible when every individual involved in its operations feels protected, respected, and engaged in a shared mission.

To demonstrate its commitment to international standards and national goals, the Company publishes its Human Rights Report, which complements the corporate Sustainability Report. This Report details the Company’s approach to upholding human rights, demonstrating how these principles are integrated into both daily operations and strategic initiatives. Nornickel’s 2024 Human Rights Report is the Company’s third publication of its kind, highlighting the consistency and continuity of its efforts in this area.

The Company’s Human Rights Report discloses information in compliance with the parameters and metrics outlined in key international human rights guidelines, such as the UN Guiding Principles on Business and Human Rights (UNGPs) and the Corporate Human Rights Benchmark (CHRB).

Disclosure boundaries in this Human Rights Report coincide with the boundaries outlined in [Nornickel’s 2024 Sustainability Report](#) in terms of key topics and aspects.

Key figures of the report

CHRB D.3.1

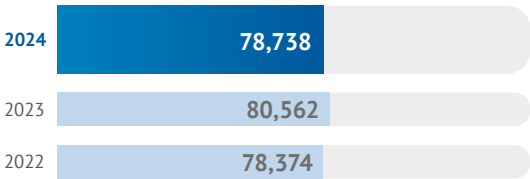
Throughout its duration from 2003 to 2024, the programme to improve workplace amenities saw investments totalling

RUB **21.7** billion

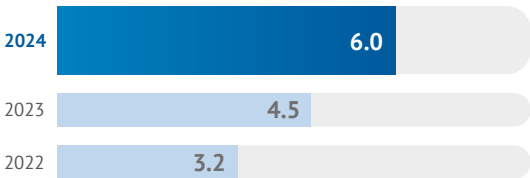
with overhauls carried out at

187 facilities in 2024

The Nornickel Group's average headcount

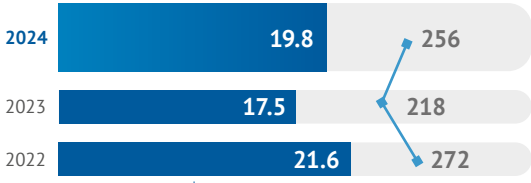


Spending on improvements in workplace amenities (RUB bn)



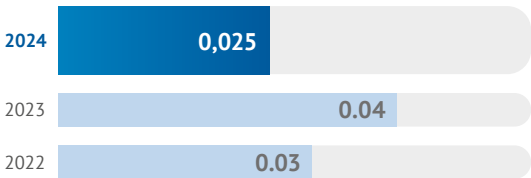
Health and safety

Health and safety expenses



■ Health and safety expenses, RUB bn
— Expenses per employee, RUB thousand

FIFR



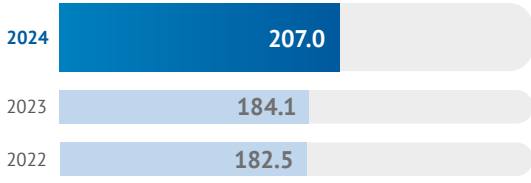
In 2024, average monthly pay at the Company was

2.1 times higher than Russia's average¹

Percentage of total employees covered by collective bargaining agreements

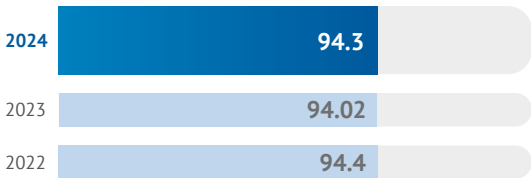
94.3 %

Average monthly salary (Group-wide) (RUB thousand)



Freedom of association

Percentage of total employees covered by collective bargaining agreements (%)



Respect for basic human rights

0 cases of forced, compulsory, or child labour



¹ Calculated with regard to the average nominal monthly salary accrued to the employees of organisations that are not small-sized enterprises in Russia. The minimum wage in the Nornickel Group is 2.1 times higher than the living wage applicable in Russia as at 1 January 2024.

Human rights at Nornickel between 2014 and 2024¹

	Key international and national milestones	Nornickel highlights
2014	Adoption of A Guide for Integrating Human Rights into Business Management (UN Global Compact)	<ul style="list-style-type: none">• Approval of the Health and Safety Strategy• Approval of the Company's first Anti-Corruption Policy by the Board of Directors• Approval of the Code of Conduct and Ethics for Members of the Board of Directors• Approval of the Human Capital Development Programme• Launch of a project to implement an employee performance management system and a 360-degree review• Signing of an agreement for the social and economic development of the Trans-Baikal Territory• Launch of the World of New Opportunities charitable programme
2015	The UN General Assembly developed 17 Sustainable Development Goals (SDGs) as a blueprint to achieve a better and more sustainable future for all	<ul style="list-style-type: none">• Introduction of the Accident Investigation corporate standard• Signing of a master agreement on cooperation during the preparation and staging of the 29th Winter Universiade in Krasnoyarsk in 2019• Launch of the Plant of Goodness corporate volunteering programme• Opening of the world's northernmost water park in Norilsk
2016		<ul style="list-style-type: none">• The Company's accession to the UN Global Compact• Taking part in drafting Norilsk 2030, a strategy for the city's social and economic development• Partnership agreement between the Company and the International University Sports Federation (FISU)• Launch of the personal donations programme for Company employees• Development of a social support programme for employees facing redundancy following Nickel Plant's shutdown in the Norilsk Industrial District
2017	Adoption of the UN Guiding Principles on Business and Human Rights as an international standard	<ul style="list-style-type: none">• Approval of the Human Rights Policy, the Company's first Community Engagement Policy, and the first Housing Programme Policy• Access to broadband internet connection in Norilsk• Creation of the Norilsk Development Agency• Update of the Company's Anti-Corruption Policy
2018	Adoption of the OECD Due Diligence Guidance for Responsible Business Conduct	<ul style="list-style-type: none">• Signing of an agreement with the Federal Agency for Ethnic Affairs on cooperation aimed at providing support to the indigenous small-numbered peoples of the North• Launch of the Leaders of Nornickel corporate development programme• Completion of the renovation of Norilsk Airport's runway
2019	Adoption of the Initiative for Responsible Mining Assurance (IRMA)	<ul style="list-style-type: none">• Launch of Your Home, a new housing initiative• Establishment of the Second School Centre, a specialised development institution in Nikel• Development of a social support programme for employees facing redundancy following the smelting facility's shutdown• Signing of an interregional cross-industry agreement for copper and nickel producers and their supporting industries for 2019–2022

UNGPs RF A1.1

	Key international and national milestones	Nornickel highlights
2020	<ul style="list-style-type: none">• Update of ICMM's Mining Principles• Issuance of the Russian President's Executive Order On the National Development Goals of the Russian Federation Through 2030• Publication of Russia's first Voluntary National Review of the progress made in the implementation of the 2030 Agenda for Sustainable Development	<ul style="list-style-type: none">• Approval of Nornickel's programme to support indigenous small-numbered peoples until 2024• Launch of the Nornickel Academy educational platform• Setting up a dedicated ethnological expedition to study the indigenous small-numbered peoples of the Taimyr Peninsula• Establishment of the Monchegorsk Development Agency• Involvement in the establishment of Women in Mining Russia (WIM Russia), a non-profit organisation that aims to promote professional development of women in the mining industry• Organisation of the World of Taimyr competition
2021	Adoption of the UN Women's Empowerment Principles	<ul style="list-style-type: none">• Signing of a four-party agreement on cooperation for comprehensive social and economic development of Norilsk for the period through 2024 and further through 2035• Launch of the free, prior, and informed consent (FPIC) procedure for the indigenous people living in Tukhard• Signing of a cooperation agreement with the Kola Sámi Association• Launch of an infrastructure service to create an air quality monitoring system in Norilsk as part of the City Online initiative
2022		<ul style="list-style-type: none">• Launch of a project to create a workplace safety culture coaching system• Revision of Nornickel's Golden Rules of Safety, OHS incentive programme, and employee awareness-raising initiatives• Launch of the Digital Healthcare project in Norilsk• Commencement of the Employee Relocation programme• Launch of the Tsifronikel.Junior educational project for the children of employees• Prior task force consultations with representatives of indigenous peoples in Lovozero
2023	Adoption of the new OECD Guidelines for Multinational Enterprises	<ul style="list-style-type: none">• Release of the Company's first public Human Rights Report• Launch of the Digital Investor corporate programme• Signing of a new agreement with the Murmansk Region for 2023–2025• Ethnicity expert review for the Kolmozerskoye project• Launch of the first stage of the Sulphur Project at Nadezhda Metallurgical Plant
2024	Issuance of the Russian President's Executive Order On the National Development Goals of the Russian Federation Through 2030 and for the Future Until 2036	<ul style="list-style-type: none">• Publication of the second Human Rights Report• Update of the Policy of Engagement with Indigenous Small-Numbered Peoples• Expansion of the Digital Investor programme for Company employees• Transfer of housing and new infrastructure to Taimyr settlements

¹ For more details on Nornickel's above projects related to the development of the human rights compliance system, social contributions to the operating regions, etc., please see the Company's prior sustainability reports, which are available on [its website](#).

Commitment to human rights

UNGPs RF A1.1, CHRB A.2.1

Statement of the Chairman of the Board of Directors

We are living in an era where corporate responsibility – to society, the environment, and each individual – is becoming a key driver of long-term sustainability for a business. At Norickel, respect for human rights is not just an obligation but a core value that underpins our corporate culture, informs our decisions, and guides our actions.

In 2024, as part of our ongoing efforts to strengthen the human rights due diligence system, we developed a methodology for assessing integrated human rights risk and launched a dedicated training programme for Group employees.

We remain firmly committed to advancing our social programmes and delivering on the goals of our 2030 Socially Sustainable Development Strategy, with a strong focus on enhancing employee well-being. In 2024, we allocated a record RUB 6 billion to the Made with Care programme, significantly improving workplace amenities for our employees. Equally important is fostering an environment that supports both professional development and personal growth. The Company operates

a comprehensive continuous learning system, further expanding its medical support initiatives, including access to health resort treatment. We are also continuing our Digital Investor project, which promotes employee engagement and improves financial literacy.

The Company places particular emphasis on the development of its host cities. The large-scale renovation of Norilsk is underway, with more than RUB 80 billion planned in investments by 2035. The programme includes the construction of new residential housing as well as social, cultural, and infrastructure facilities. We are also deepening our engagement with indigenous minority peoples. Updated in 2024, our corporate Policy of Engagement with Indigenous Small-Numbered Peoples is aligned with recognised international standards.

All of these efforts are aimed at ensuring the sustainable development of Norickel and strengthening our social licence to operate. And in this milestone year – our 90th anniversary – we wish to express our heartfelt gratitude to all our employees, partners, and local communities for their continued support and contributions to our shared initiatives.

Norickel's policy statement on human rights

CHRB A.1.3.b

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

Norickel complies with the national laws of the Russian Federation while adhering to international standards and corporate best practices in upholding and protecting human rights. The Company has implemented and continues to enhance its human rights due diligence system.

The Company is committed to providing a safe and comfortable working environment for everyone, fostering equitable engagement among employees, suppliers, partners, and other stakeholders.

Norickel's public policy statement on human rights

Norickel is committed to upholding the principles of equality, fairness, and respect for every individual's human rights. The Company does not tolerate any form of discrimination and prohibits the use of forced or child labour, both in its operations and throughout its supply chains. All employees – regardless of gender, ethnicity, place of residence, social status, age, beliefs, or any other factors not related to their professional abilities – are provided with equal opportunities to exercise their labour rights and realise their career potential.

The Company does not operate in, nor does it source raw materials from, conflict-affected or high human rights risk areas.

Norickel adheres to high standards of business ethics and expects its suppliers, contractors, and partners to take a similar responsible approach to human rights compliance. For more details, please see the [2024 Responsible Supply Chain Report](#).



Our values¹

People are the Company's key value. Throughout its operations spanning nine decades in the Far North, Norickel has built distinctive professional expertise that enables the Company to effectively navigate challenges of unprecedented scale and complexity while maintaining the highest standards of product quality.

These statements are consistent with Norickel's values



Efficiency

The Company's primary aspiration and a driving force behind the development of each employee's professional qualities



Safety

A fundamental priority shared by the Company and all employees



Care for people

The cornerstone of collaboration and interaction within our teams

¹ For more details on our corporate values, please see the link below: <https://norickel.ru/upload/iblock/buklet-po-cennostyam-181124.pdf>.

Key human rights initiatives and declarations guiding Nornickel activities

Generally recognised international and Russian declarations, guidelines, and initiatives	Russian legislation	Practical recommendations	Industry-specific initiatives
<ul style="list-style-type: none">• UN Universal Declaration of Human Rights• UN Global Compact• ILO Declaration on Fundamental Principles and Rights at Work• International Labour Organization Conventions• OECD Guidelines for Multinational Enterprises• Social Charter of Russian Business	<ul style="list-style-type: none">• 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 federal laws and regulations	<ul style="list-style-type: none">• UN Guiding Principles on Business and Human Rights (UNGPs)• Guide for Integrating Human Rights into Business Management (UN Global Compact)• International Finance Corporation's (IFC) Performance Standards on Environmental and Social Sustainability• Voluntary Principles on Security and Human Rights (VPSHR)• GRI Sustainability Reporting Standards	<ul style="list-style-type: none">• Initiative for Responsible Mining Assurance (IRMA)• ICMM's Mining Principles

List of human rights priorities



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

Guided by international standards and industry practices, and considering its operational profile, the Company has identified the key human rights that merit particular attention. These rights are applicable to Nornickel employees, local community members, and employees of the Company's suppliers.

Key human rights across Nornickel's operations

Affected stakeholder groups	Company employees	Local communities	Contractor employees
Human rights area	<p>Fundamental rights</p> <ul style="list-style-type: none">• Right to life• Right to liberty• Right to privacy and security of 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 just and favourable remuneration• Right to just and favourable working conditions• Right to social security• Right to a reasonable limitation of working hours• Right to periodic holidays with pay• Prohibition of forced labour <p>Rights to occupational health and safety</p> <p>Rights to freedom of association and collective bargaining</p> <p>Rights to the protection of family, maternity, and childhood</p> <p>Rights of employees and external stakeholders to a healthy environment</p>	Rights of local and indigenous communities	Human rights as part of supply chain responsibility commitments ¹



¹ For more details on human rights as part of supply chain responsibility commitments, please see PJSC MMC Norilsk Nickel's [Human Rights Policy](#), [Supplier Code of Conduct](#), and [Responsible Sourcing Policy](#).

Internal documents on human rights

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

Nornickel enforces its human rights policy through internal regulations designed to ensure adherence to international standards and national laws. The Company's Human Rights Policy is the key document governing its approach to protecting and promoting human rights.

Human Rights Policy

In 2021, [PJSC MMC Norilsk Nickel's Human Rights Policy](#) was updated and approved by the Company's Board of Directors.

PJSC MMC Norilsk Nickel's Human Rights Policy is the key document outlining the Company's principles, commitments, and mechanisms for protecting and upholding human rights. The Policy primarily aims to ensure compliance with Russian laws and regulations while also striving to uphold the principles and provisions of the Universal Declaration of Human Rights, ILO Conventions, the UN Guiding Principles on Business and Human Rights (UNGPs), and other recognised international standards, in order to prevent or minimise human rights violations across the Company's operations and supply chain.

The Policy's key focus areas



Labour rights



Non-discrimination



Workplace health and safety



Support for local and indigenous communities



Safety

PJSC MMC Norilsk Nickel's Human Rights Policy is supported by other internal regulations, which cover a broad range of rights and interests of all stakeholder groups, including:

- [Business Ethics Code of PJSC MMC Norilsk Nickel;](#)
- [Equal Opportunities Programme;](#)
- [Working Conditions Policy;](#)

- [PJSC MMC Norilsk Nickel's Freedom of Association Policy;](#)
- [PJSC MMC Norilsk Nickel's Community Engagement Policy;](#)
- [Policy of Engagement with Indigenous Small-Numbered Peoples.](#)

UNGPs RF A1.1

The Policy is reviewed by the Company's Board of Directors on a regular basis. No amendments were made to the Human Rights Policy in 2024. The current version of the Policy fully reflects Russian legislation, up-to-date international standards, and the Company's corporate commitments.



Impact of human rights risks on the Company's strategy and business model

CHRB A.2.4

When social aspects of operations, including those related to human rights, pose significant risks or have implications for the Company's operational resilience and business reputation, corporate governance bodies may initiate adjustments to the corporate strategy and, in some cases, even to the Company's business model and production chain.

The revision process may be initiated either by management, with proposals developed and submitted to the Board of Directors for approval, or by the Board of Directors, which may issue proposals as formal recommendations for subsequent implementation by management.

Nornickel's 2030 socially sustainable development strategy

One example is the adoption of the Socially Sustainable Development Strategy in 2023, which is guided, among other things, by the principles of the Company's Human Rights Policy and the Business Ethics Code. The document outlines the Company's key development areas in social responsibility. The strategy covers four priority areas that support both the Company's long-term development and broader societal progress, all of which are directly related to human rights: health and safety, talent management and corporate culture, development of technologies and products that help foster technological and social progress, and involvement in the lives of local communities and society at large. Risks associated with occupational safety, workforce shortages, and engagement with local communities prompted the Company to adopt a strategic document with a long-term planning horizon.

[For more details, please see Nornickel's 2024 Sustainability Report.](#)

Sulphur Project

Another example is the decision to implement the large-scale Sulphur Project aimed at dramatically reducing sulphur dioxide emissions across the Company's footprint, as health risks to local communities were assessed as high. As a result, this project has been included in both the Company's long-term development strategy and its environmental strategy. Since this ambition could not be achieved otherwise, the Company revised its business model and production chain accordingly. A number of production facilities on the Kola Peninsula were shut down, and the associated logistics flows were redirected. For more details on the implementation of the Sulphur Project and the associated process, please see the Company's 2019–2024 Sustainability Reports.

Governance structure, responsibilities, and oversight of human rights

CHRB A.2.4

The Company has in place a comprehensive governance structure to oversee human rights. Risks related to potential violations in this area are reviewed by the committees of MMC Norilsk Nickel's Management Board and Board of Directors through the analysis of regular risk reports and through the approval of the Company's annual public disclosures, including those on human rights. At the level

- of the Board of Directors, matters related to Nornickel's 2030 Socially Sustainable Development Strategy and Human Rights Policy are overseen by:
- the Sustainable Development and Climate Change Committee (responsible for reviewing and approving key policies, standards, and initiatives aimed at incorporating human rights principles into the Company's operations, as well as for reviewing the Company's public sustainability disclosures);
 - the Audit Committee (reviews reporting on complaints received through the Corporate Trust Line);
 - the Strategy Committee (reviews reporting on work-related injuries).

Human rights in KPIs

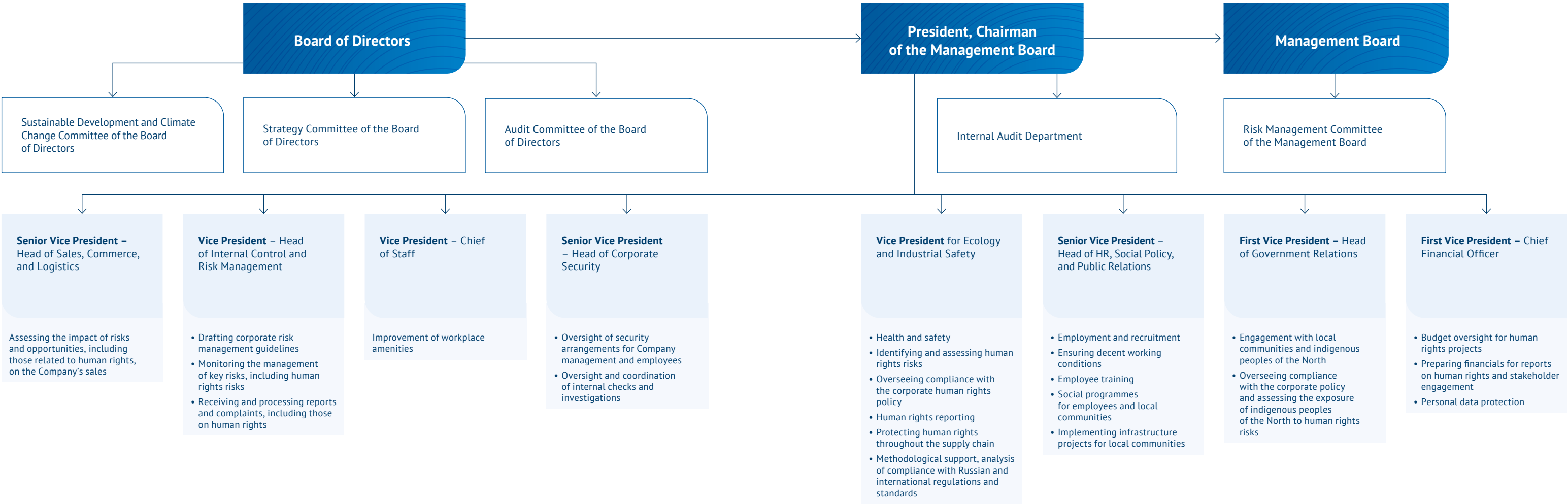
CHRB A.2.3, B.1.2

The Company's senior executives are actively engaged in upholding human rights, with this commitment reinforced by a system of collective annual key performance indicators (KPIs). The KPI structure includes an integrated occupational health and safety indicator, which has a specific weight of 30%.

Alongside systemic, management-level initiatives, the Company introduces additional employee incentives to reinforce safety culture and compliance with human rights principles. In particular, in 2023, the Company rolled out a system of rewards for identifying workplace risks. This initiative not only helps reduce the likelihood of accidents but also actively engages employees in fostering a safe working environment.

Governance structure, responsibilities, and oversight of human rights¹

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

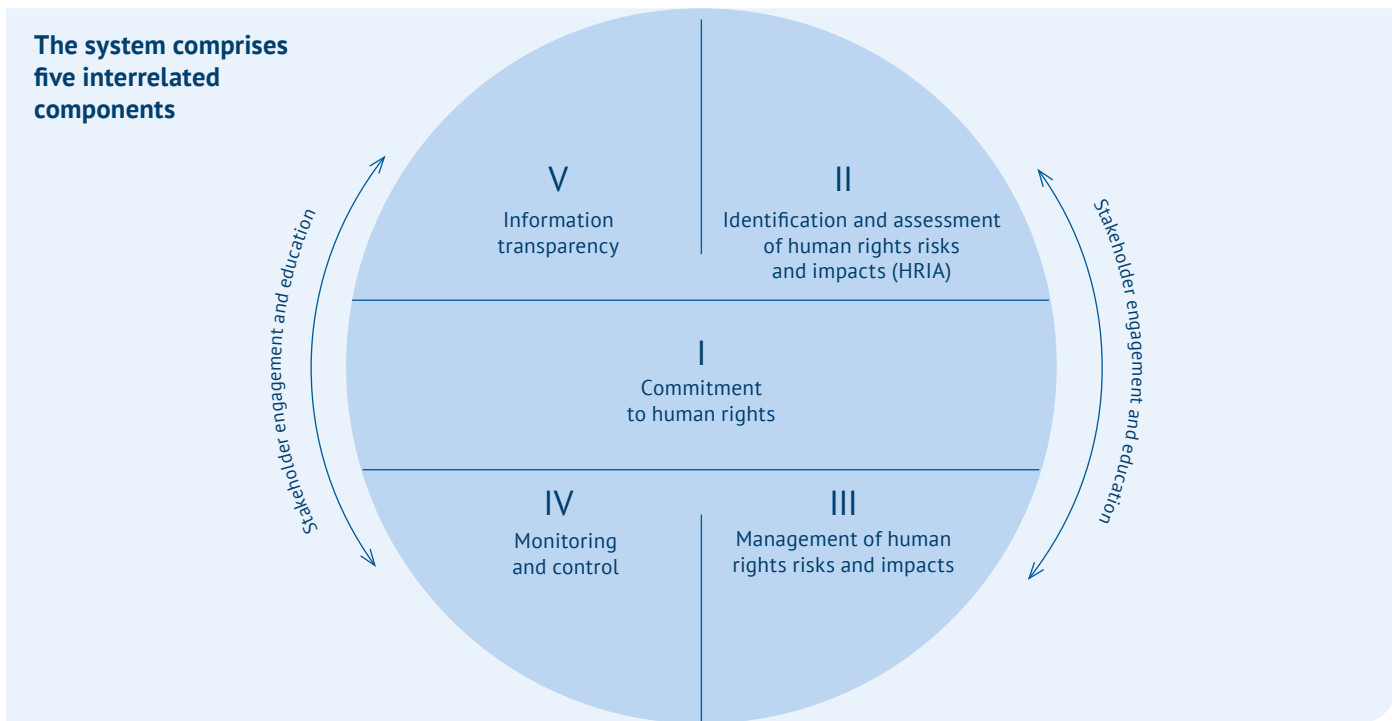


¹ For the key functional responsibilities at different governance levels, please see PJSC MMC Norilsk Nickel's Human Rights Policy available on the Company's official website at https://www.nornickel.com/upload/iblock/df8/PJSC_MMC_Norilsk_Nickel_Human_Rights_Policy.pdf.

Nornickel's human rights due diligence procedure

The human rights due diligence system in place at Nornickel is aligned with international standards and guided by the UN Guiding Principles on Business and Human Rights (UNGPs).

Nornickel's human rights due diligence system



- I. Commitment to human rights** is outlined in the [Company's Human Rights Policy](#), which outlines the fundamental principles of the Company's activities, commitments, and initiatives in upholding and protecting human rights. Alongside the Policy, the Company applies other corporate documents that cover human rights and the Company's commitments to specific groups of right holders.
- II. Identifying and assessing human rights risks and impacts** is a complex process that forms the basis for making a list of priority human rights risks and impacts across the Company's business units, followed by the implementation of appropriate corrective actions.
- III. Human rights risks and impacts are managed** based on assessments conducted at the level of business units identified as having the highest risk of human rights violations.

- IV. Monitoring and control** are carried out by the Sustainable Development Department based on information provided by the Company's business and other units regarding the measures implemented and results achieved in mitigating human rights risks.
- V. Information transparency** is ensured through responses to stakeholder queries regarding the upholding and protection of human rights as well as through the publication of corporate sustainability reports and human rights reports.

What was done in 2021–2024 as part of the human rights due diligence system?

1

Between 2021 and 2024, Nornickel adopted a number of key internal regulations, including the Human Rights Policy and the Stakeholder Engagement Policy adopted in 2021 as well as the Policy of Engagement with Indigenous Small-Numbered Peoples updated in 2024. These documents were approved by the Board of Directors and formally set out the Company's commitment to the principles of upholding and protecting human rights

2

Dedicated corporate documents, including a human rights classification and methodology, were developed to systematise and standardise the Company's approach to identifying potential risks and impacts

3

A significant step in the development of the due diligence system was the first human rights risk assessment conducted in 2022, covering aspects such as the right to health, the right to work, protection from forced labour, the right to life, and fair and adequate remuneration

4

The Company assessed its human rights index for the first time, based on an analysis of responses from engagement surveys. Survey findings are a key tool for assessing integrated human rights risk

5

The first dedicated human rights courses were launched for all Company employees, including security personnel in particular

6

Two public standalone human rights reports for 2022 and 2023 were released. This Report is the Company's third report reflecting the progress accumulated in this area

Improvements to the human rights due diligence system in 2024

The Company continues improving its human rights practices, regularly assessing its progress. The following was developed in 2024:

Classification of reports and complaints	Methodology for assessing integrated human rights risk	Risk assessment at the Group entity level
The Corporate Trust Line was expanded to include a query classification tool. Each incoming query is assigned an appropriate category and subcategory depending on its topic and the human rights potentially involved	A human rights risk assessment system was developed. The system incorporates an analysis of queries received via the Corporate Trust Line, the results of the Let Everyone Be Heard engagement survey, and non-financial reporting data	Integrated risk is assessed individually for each of the Group's production facilities, allowing for the prioritisation of areas where corrective and mitigating measures should be developed and implemented in relation to: <ul style="list-style-type: none"> Group entities with the highest human rights risks; human rights most frequently exposed to violation risks across the Company as a whole; processes that require systemic change

Nornickel not only consistently strengthens its internal human rights processes but also demonstrates high standards in its external practices. In 2024, the Company earned a finalist finish in the MINEX Forum's Russian Mining Excellence Awards, in the Sustainability Project category, for developing a human rights due diligence system. This achievement reflects the results of its comprehensive efforts to integrate risk assessment and management tools, enhance the transparency of internal processes, and actively engage with employees and stakeholders.

Identification and assessment of human rights risks and impacts

CHRB B.1.3, B.2.1, B.2.2, B.2.3, UNGPs RF C4.1, UNGPs RF C4.2

For more details on the system's operation, please see [Nornickel's 2024 Sustainability Report](#) (the Internal Control and Risk Management section).

The Company assesses risks and impacts of human rights violations, monitors and controls observance of human rights based on internationally recognised methodologies and guidelines, including:

- Human Rights Impact Assessment Guidance and Toolbox, Danish Institute for Human Rights (DIHR), 2020;
- UN Guiding Principles on Business and Human Rights (UNGPs), 2011.

Based on a survey and assessment carried out in 2022–2023, the Company conducted an in-depth study of current threats, taking into account complaints and reports received through the Corporate Trust Line and holding a series of meetings with employees across its regions of operation. The corporate risk management system covers human rights risks.

Key human rights risks

Right	Related risks	Assessment of potential impact on the Company's goals
Employee right to 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 ESG requirements put forward by customers, industry standards, associations and exchanges	High
Right 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

For more details on Nornickel's approach to building a responsible supply chain, please see [Nornickel's 2024 Responsible Supply Chain Report](#).

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 2024, mineral supplier¹ due diligence identified no risks.

Improvements to the methodology for identifying human rights risks

In 2024, Nornickel continued to improve its methodology for identifying and assessing human rights risks. These efforts included processing the results of the Let Everyone Be Heard engagement survey, analysing specific metrics featured in the Sustainability Report, and studying queries submitted through the Corporate Trust Line channels. In the reporting year, the risk assessment process based on incoming queries was automated through the initial classification of queries upon receipt, including the assignment of event categories and subcategories.

Category	X	Number of subcategories
20 Remuneration	4	Environmental pollution
9 Social benefits	6	Workplace health risks
3 Violation of privacy	5	Workplace amenities
17 Violations related to the management of labour processes	18	H&S requirements, personal protective equipment (PPE), production equipment
12 Violations of the work and rest schedule	3	Child labour
	13	Discrimination

Therefore, integrated human rights risk reflects both the level of risk associated with each human right and business unit as well as overall positive or negative trends, which can be used for ongoing monitoring of the due diligence system effectiveness.

Management of human rights risks

CHRB A.2.2, A.2.3

63%
Human rights engagement index

66%
Health and safety engagement index

At the level of corporate governance bodies, human rights risks are considered by the Risk Management Committee of MMC Norilsk Nickel's Management Board (in consolidated risk reporting), the Audit Committee of the Board of Directors (in consolidated risk reporting), the Strategy Committee of the Board of Directors (in reporting related to occupational safety and injuries), and the Sustainable Development and Climate Change Committee of the Board of Directors (in human rights reporting).

These bodies approve the relevant concepts, regulations, and guidelines while ensuring that organisational measures are in place and facilitating the necessary exchange of information between the Company's units.

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

The operation of the risk management system also involves the Internal Audit Department, which annually assesses the effectiveness of existing tools, and an internal control function, which provides guidance and participates in risk assessment of business processes.

In addition, Nornickel regularly runs an engagement survey called "Let Everyone Be Heard. What Do You Think?" in the form of a questionnaire. In 2024, the survey involved 58.1 thousand employees, up 1.7% y-o-y. The engagement index at Nornickel reached 67%.

Based on the results of the engagement 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.

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

In 2025, the Company plans to introduce a new index guided by its Care for People value, to assess working conditions, employee support and well-being, work-life balance, and other metrics important to employees.

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

Monitoring and control

CHRB B.2.4

To monitor and control human rights risks at the operational level, the Company reviews and analyses reports of the Corporate Trust Line and the Grievance Mechanism.

¹ The Group's mineral suppliers include suppliers of mined minerals (primary processed material which has never been previously refined) and suppliers providing minerals transportation, their processing and loading/unloading services.

Training at Nornickel

Human rights training

CHRB B.1.5

In the reporting year,
60 thousand employees received training on upholding and protecting human rights

Employee training is a key element of the human rights due diligence system and an important tool for building professional competencies of employees.

Sustainability is one of the key focus areas of training. Nornickel offers both basic sustainability training and dedicated courses, covering topics such as climate, corporate governance, and more.

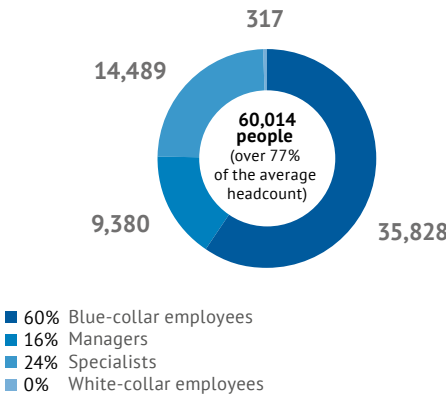
In 2024, the Company launched a corporate training course devoted to Nornickel's sustainable development, which also addresses the upholding and protection of human rights. By the year's end, over 15 thousand Company employees had been trained under the programme.

Particular emphasis in training is also placed on health and safety. Employees are offered briefings and comprehensive training courses, including dedicated modules tailored to the specifics of our operations.

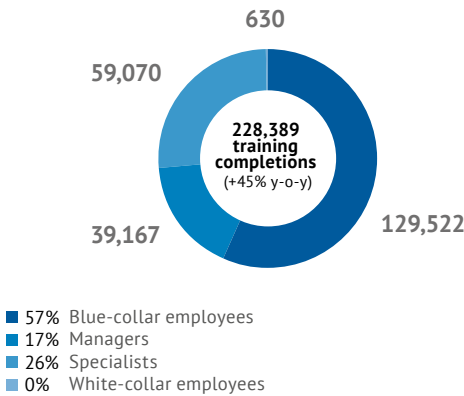
In line with the training strategy, training programmes targeting critical competencies involve all personnel categories, without exception. In the reporting year, 60 thousand employees received training on upholding and protecting human rights, demonstrating the Company's commitment to fostering a safe and sustainable working environment and contributing to the achievement of Russia's national goals.

Critical competencies¹ training indicators in 2024

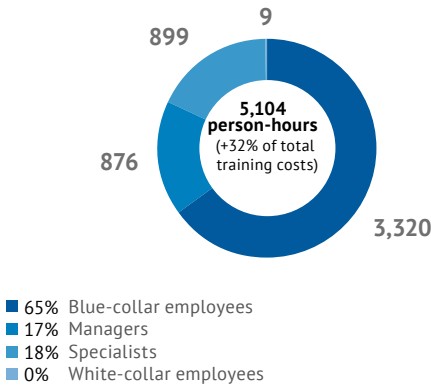
Employees covered by training programmes on critical competencies



Employees covered by training programmes on critical competencies (training completions)

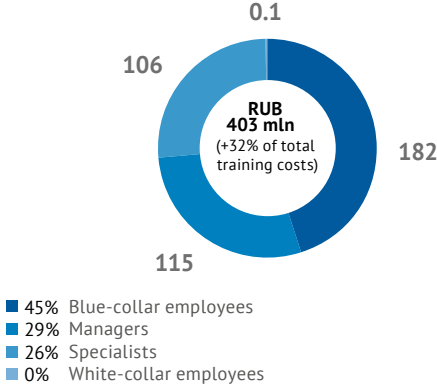


Training on critical competencies (thousand person-hours)



The Company actively fosters employee competencies, with a focus on modern challenges and emerging technology trends. Amid rapid digitalisation, training

Critical competencies training costs (RUB mln)



is delivered in various formats – from webinars to tailored courses powered by innovative software solutions and technologies.

of weapons. Security personnel are required to confirm their qualifications on an annual basis through periodic assessments.

Regular on-site visits to the facilities of Company branches and business units are conducted to inspect the activities of security providers. In 2024, these inspections revealed no violations of human rights by employees of such security organisations. All information on potential incidents is shared via a network of security operations centres. Additionally, experts from Nornickel's security units organise training sessions and drills for security personnel as well as tests on laws and regulations governing private security operations and arms in circulation. Representatives of law enforcement agencies also take part in the drills.

Special human rights training course

The course achieved a

96.2%

success rate, indicating improved legal literacy among employees with regard to human rights and reinforcing the principles of respect, inclusion, and fairness in the workplace

A total of

1.4 thousand

security personnel are involved daily across the Group's facilities to ensure their protection and physical security

Human rights training for employees of security providers

CHRB D.3.7

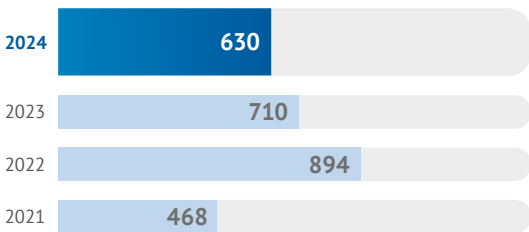
A total of more than

5 thousand

employees of 20 major security providers are engaged in this area

Among other provisions, PJSC MMC Norilsk Nickel's Human Rights Policy addresses concerns related to the use of force and firearms. As part of their professional training, all private security officers are required to complete dedicated programmes and pass a qualification exam, the requirements for which are established by the Russian Government. The training programme covers key topics such as protecting the life and health of citizens, providing first aid, and the safe handling

Training sessions held for employees of security providers



¹ The following competencies are identified as critical: occupational health and safety, ESG, digital proficiency / digital literacy.

Stakeholder engagement

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

Nornickel aims to foster relationships with all stakeholders based on respect, mutual trust, and a balance of interests. The Company is guided by global best practices and standards

for responsible engagement, including the recommendations of ISO 26000:2010 and AA1000SES (2015).

Nornickel’s internal regulations on stakeholder engagement



For more details on stakeholder engagement mechanisms, please see [Nornickel's 2023 Human Rights Report](#).

CHRB B.2.5, UNGPs RF A1.3

The Company organises dialogues, round tables, public discussions, and face-to-face meetings with stakeholders, while also creating various platforms for stakeholder engagement. In addition, Nornickel delivers educational programmes and trainings for employees and partners. Public disclosure also plays an important role: key information is published on the Company website, covered by the media, and included in public reports.

For more details on stakeholder engagement, including reports on stakeholder dialogues, please see [Nornickel's 2024 Sustainability Report](#).

UNGPs RF A2.3, UNGPs RF C2.3

The results of such engagements are incorporated into the Company’s strategic documents and internal policies. In particular, the Company developed and implemented a five-year plan to promote the social and economic development of Taimyr¹ based on consultations with the indigenous peoples of Taimyr. In addition, several provisions of the Company’s Policy of Engagement with Indigenous Small-Numbered Peoples, updated in 2024, are informed by the preferences of indigenous community members and reflect the engagement experience gained over the past five years.

¹ For more details, please see Nornickel's 2020–2024 Sustainability Reports.

Remedies and grievance mechanisms

Corporate trust line

Grievance policy

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

The Company’s Corporate Trust Line (CTL), established in 2010, is the Company’s key grievance mechanism.

A clearly structured process ensures that all submissions are reviewed objectively and impartially, with full respect for the rights of all parties involved. The Corporate Trust Line is designed to identify and prevent violations, uphold the highest standards of corporate ethics, and foster trust within the Company and among its partners.

CHRB C.4, UNGPs RF C6.2

The Corporate Trust Line covers all Company units and Group entities, enabling prompt responses to emerging challenges across the Company’s footprint and ensuring a consistent standard for handling complaints and reports.

The Corporate Trust Line is available to all stakeholders, whether they are employees, partners, customers, or representatives of external organisations. The Company investigates reports of potential violations, misconduct, or incidents that might cause financial or reputational damage. All reports are thoroughly reviewed, and any identified risks trigger appropriate corrective actions to ensure their mitigation and elimination.

Key operating principles of the Corporate Trust Line:



Contacts of the Corporate Trust Line

✉	skd@nornik.ru	📍	1st Krasnogvardeysky Drive 15, Moscow, Russia, 123112, Corporate Trust Line of MMC Norilsk Nickel
☎	8 800 700 1941 8 800 700 1945		
📱	Supernika mobile app (for Nornickel employees)		
🌐	https://nornickel.com/sustainability/corporate-hotline/		
			Information about the Corporate Trust Line is made available to employees via the intranet portal, the Company website, information screens, physical stands, posters, and payslips.

For more details, please see [Nornickel's 2023 Human Rights Report](#).

The Company does not administer any punishments, disciplinary action, discrimination, pressure, or retaliation against individuals who voice their concerns or report identified issues. The Company guarantees that reporting persons will not face any negative consequences as a result of reporting, regardless of their position, status, or manner of cooperation.

UNGPs RF C6.3

The service is governed by the [Procedure on the Corporate Trust Line of PJSC MMC Norilsk Nickel](#), which establishes clear rules for receiving, reviewing, and processing reports. The document ensures that the reporting person is provided with a response on the decision made and, once the review process is complete, the opportunity to complete a feedback form to assess satisfaction with the handling of the report. To enhance transparency,

the Company now publishes anonymised information on the content of reports and measures taken. If a report is confirmed as justified, audits are initiated. The information is brought to the attention of relevant units and officers to ensure timely response and prevent similar cases in future.

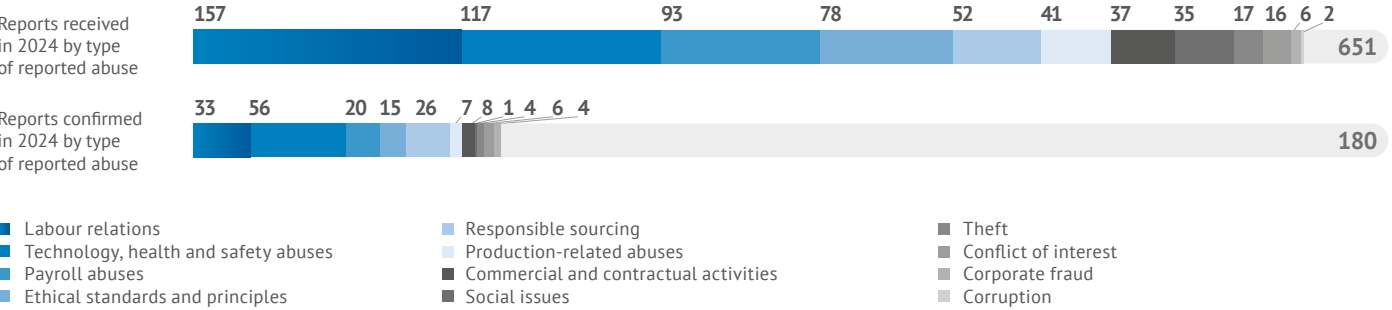
The performance of the Corporate Trust Line is reviewed annually by the Vice President – Head of Internal Control and Risk Management, including through the setting of KPIs, and is also considered at meetings of the Board's Audit Committee.

Key performance indicators of the business process:

- timely processing of complaints/reports accepted for review;
- proper processing of complaints/reports accepted for processing (number of refusals to investigate);
- timely preparation of reports on CTL performance to interested users.

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

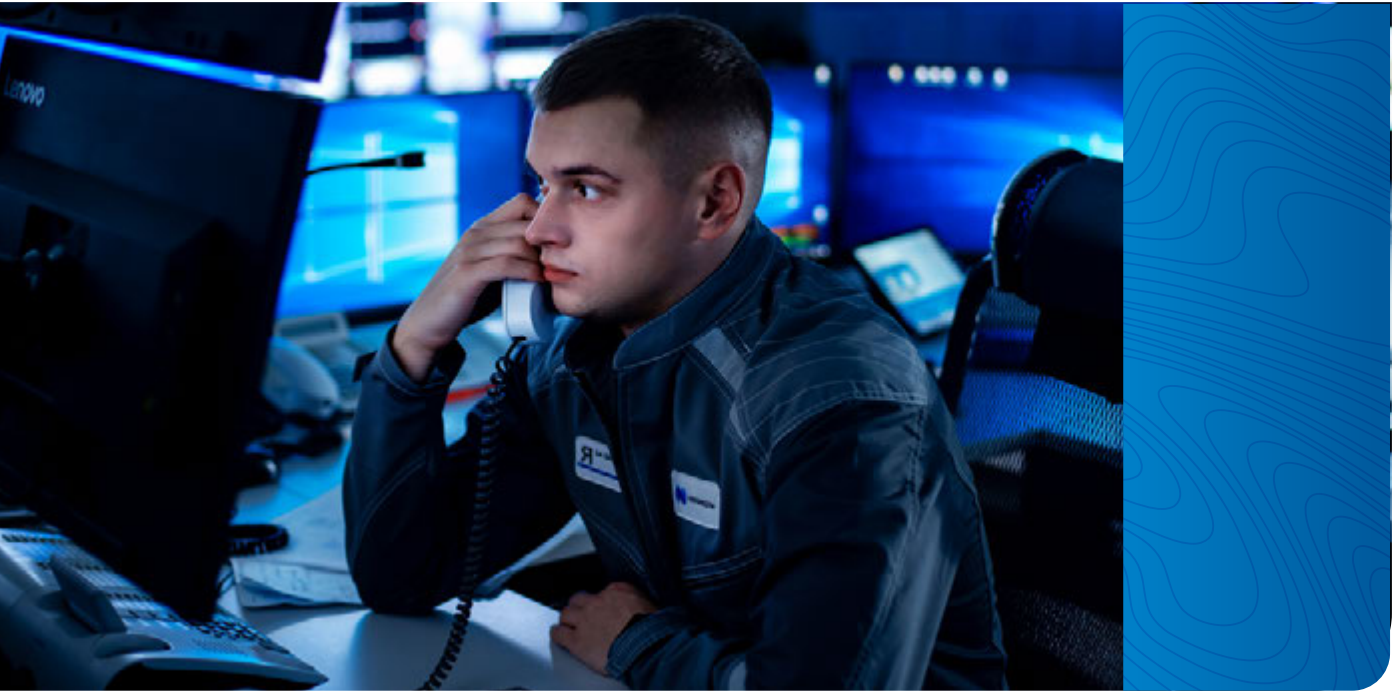
Complaints/reports in 2024 by type reported



Report statistics (broken down by Group entity and type of reported abuse) are submitted to relevant Company units, with CTL performance reviewed by the Board's Audit Committee.

As part of operating the Corporate Trust Line, a reporting person is provided with feedback at all report review stages: confirmation of registration of the complaint/report (including information on standard review timelines), information on the decision taken on the report or dismissal of the complaint/report, and the results of the report's review (if requested by the reporting person). If desired, the reporting person may assess the handling of the report.

The feedback received from applicants suggests that over 90% of reporting persons are satisfied with the handling of their reports. Additional follow-up measures were taken for each unsatisfactory feedback, including with the involvement of experts from relevant functions, and follow-up communications with the reporting persons.



Employees responsible for the operation of the Corporate Trust Line

Vice President – Head of Internal Control and Risk Management

Director of the Internal Control Department

CTL head

Grievance mechanism

CHRB C.2, CHRB B.1.6

The grievance mechanism is a corporate tool aimed at ensuring a transparent process for filing, reviewing, and addressing complaints related to the Company's operations.

CHRB C.7

The grievance mechanism is focused on both employees of Group entities and engagement with external stakeholders. Meanwhile, it does not replace the existing legal tools used to protect the interests of individuals and organisations. Participation in the procedure is at the reporting person's discretion and does not affect their right to resort to government human rights mechanisms.

The grievance mechanism procedure

CHRB C.6

The grievance mechanism offers stakeholders an additional opportunity to resolve conflicts through constructive dialogue and mediation. It provides an opportunity to address differences out of court.

CHRB C.3

Assessing the effectiveness of the grievance mechanism is a key component of the Company's corporate control system. Its operation is monitored at two levels.

Routine oversight

Implemented on an ongoing basis by analysing feedback from reporting persons and assessing the level of satisfaction with the grievance process and the results of decisions taken

In-depth analysis

Held annually as part of stakeholder consultations across the Company's footprint and through the Let Everyone Be Heard survey, designed to identify the principal challenges and expectations of local communities and partners

For more details on the grievance mechanism, please see [Nornickel's 2023 Human Rights Report](#).

¹ By the respective individuals or legal entities themselves; the Company does not forward reports to government authorities.

Remedies for local and indigenous communities

In 2024, the Company updated its Policy of Engagement with Indigenous Small-Numbered Peoples, strengthening mechanisms for dialogue and the protection of their rights. The new policy emphasises respect for the individual and collective rights of indigenous peoples, provides for additional due diligence measures, and is based on the following approaches:

- free, prior, and informed consent of indigenous minorities in line with standards and recommendations of the International Council on Mining and Metals;
- support and development of traditional trades;
- commitment to the principle of consultations in good faith.

To manage risks related to the violation of the rights of indigenous peoples, the Company implements a dedicated due diligence procedure. As part of its efforts to enhance approaches to engagement with the indigenous small-numbered peoples of the North, Nornickel is improving its feedback and response mechanisms, focusing on establishing a sustainable, constructive, and institutionalised process. A dedicated procedure is currently being developed to provide a clearer framework for handling complaints, including provisions for involving an independent Ombudsman. This development is guided by applicable Russian laws, corporate standards, and internationally recognised principles of responsible business conduct.



Nornickel’s human rights achievements in 2024

Respecting employee rights

UNGP’s RF C4.3, UNGPs RF C6.5

Nornickel gives every employee equal opportunities to exercise their labour rights. This includes non-discriminatory access to employment, equal opportunities for professional growth, a safe working environment, and protection from all forms of forced or unfair labour.


Throughout its operations, the Company consistently addresses socially significant challenges to improve working conditions and enhance the quality of life for employees and their families. Employee support

programmes in place at the Company provide access to healthcare services, educational and housing initiatives, and a range of social benefits.


Working conditions

CHRB A.1.2.b


In accordance with the Russian Labour Code and the Working Conditions Policy, the Company guarantees its employees the following.




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 day in line with the general rule




For full-time employees working between 10:00 pm and 6:00 am, working time shall be reduced by one hour, with no reduction in pay



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

Nornickel employees are entitled to a 28-day paid annual basic leave and additional paid leaves for those working in the Far North and equivalent regions, exposed to adverse and/or hazardous working conditions, or as otherwise provided by law. Employees may reschedule or split up their leaves, subject to agreement with their supervisors.

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

Made with Care

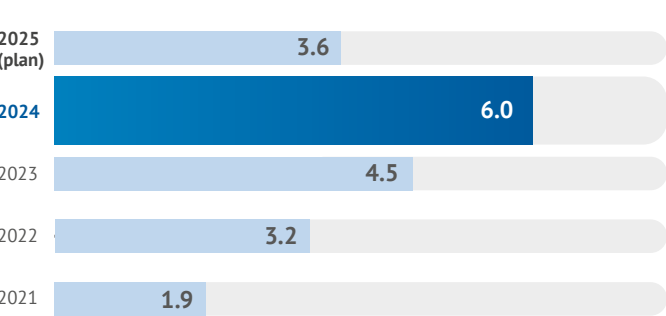
Nornickel believes that comfortable working conditions and workplace amenities reduce work-related injuries, enhance employee motivation and engagement, and improve their health.

For more than 20 years, the Company has been running Made with Care, a workplace welfare facility repair programme aiming to provide employees with comfortable working conditions.

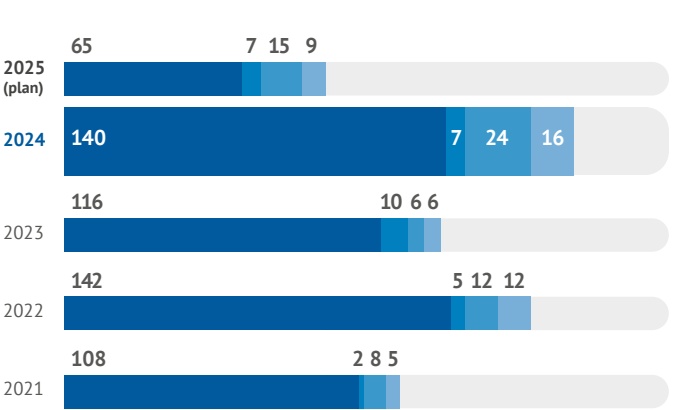
In 2024, the programme set a new record for the number of facilities renovated, the scope of work completed, and the number of employees whose working conditions were significantly improved.

Programme results for 2003–2024	Results for 2024	Plans for 2025
<ul style="list-style-type: none">• 1,035 welfare facilities repaired• 496 portable buildings purchased• Total costs: RUB 21.7 bn	<ul style="list-style-type: none">• 187 welfare facilities overhauled• Total area of repaired facilities: 25 thousand sq m• Workplace amenities improved for more than 11.8 thousand employees• The total cost of the works amounted to RUB 6 bn (net of VAT)	<ul style="list-style-type: none">• 96 welfare facilities repaired (22 thousand sq m)• Repair of several entrances, common use areas, and façades of administrative facilities• Planned costs: RUB 3.6 bn

Costs of the programme to improve workplace amenities (RUB bn)



Welfare facilities overhauled



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.

22
collective bargaining agreements signed by Group entities

94.3%
of Nornickel employees covered by collective bargaining agreements

6.8%
of Group employees are members of trade unions

76.2%
of Group employees are represented by social and labour councils

Collective bargaining agreement

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.

In 2024, the collective bargaining agreements of MMC Norilsk Nickel and three other Group entities were extended for three years. The updated agreements stepped up targeted support for certain employee categories (e.g. revising financial assistance limits, expanding guarantees for employees with disabilities, increasing reimbursement levels for employees' relocation costs after terminating their employment in the Far North, and more). During collective bargaining, representatives of employees and the employer agreed to extend for another three years the existing collective bargaining agreement, keeping all guarantees, compensations, and social programmes unchanged.

Maternity and childhood protection

CHRB D.3.9

Nornickel fosters conditions that enable employees to successfully balance their professional responsibilities with a fulfilling family life. The Company considers dismissal or discrimination based on pregnancy or marital status unacceptable, guarantees the right to parental leave, and provides support during childbirth and child-rearing. In addition, the Company carries out initiatives aimed at supporting and promoting the development of employees' children.



Terms of financial assistance and lump-sum payments

	Employee category	Terms	Frequency	Amount (RUB thousand)
Maternity	Employees on maternity leaves	Upon occurrence	In a lump sum	Top-up payment to match their fixed or average wages
Employees giving birth to or adopting a child	One of the parents	For each child	In a lump sum	20–30 (depending on the region)
Leave to care for children up to three years of age	Employees on childcare leave	Payable per child in the specified age bracket	Monthly	3.5–5 (depending on the region)
Per employee with a disabled child	Parents of a disabled child (up to 18 years of age)	For each disabled child	Quarterly	10–15 (depending on the region)

Nornickel supports the leisure and health of employees' children aged 8 to 14 by providing them with subsidised summer camp vouchers. The programme is aimed at organising recreation for unaccompanied children in specialised childcare facilities located in regions with favourable

climate conditions. In 2024, a total of 1,656 children of Nornickel employees spent their summer holidays at specialised childcare facilities, including a recreation camp in Anapa and a session for a sports team held at the Universiade Village in Kazan.



Health and safety

CHRB D.3.4

Employee health and safety is one of Nornickel's strategic priorities. This priority is set out in the Company's three corporate values, the 2030 Socially Sustainable Development Strategy,

Key Focus Areas in Occupational Health and Safety for 2023–2025, and MMC Norilsk Nickel's Occupational Health and Safety Policy.

Work-related injuries

Indicator	2020	2021	2022	2023	2024
FIFR	0.08	0.10	0.03	0.04	0.025
LTIFR	0.21	0.38	0.58	0.65	0.64
Total number of work-related accidents under the Russian labour laws	31	53	71	83	78 ¹
Fatal work-related injuries	9	11	4	5	3
Occupational diseases identified	235	213	174	145	139
Occupational disease rate (ODR)	2.21	1.94	1.49	1.21	1.18
Injury rate ²	0.28	0.48	0.61	0.69	0.66

Achieving zero fatalities is a public goal of the Company. The increase in lost time injury frequency rate (LTIFR) from 2020 is associated with a new approach to recording, classifying, and investigating accidents. Following another update to the Golden Rules of Safety, the Company has tightened penalties for concealing work-related accidents starting in 2021. In this way, Nornickel seeks to obtain complete information on all injuries in order to promptly analyse, respond, and mitigate health and safety risks.

Care for health

Nornickel also pays particular attention to the health of its employees by providing access to high-quality and timely medical care.

Multidisciplinary medical centres operate at the Kola site and in the Norilsk Industrial District for Group employees and their covered relatives, with appointments available under both VHI and CHI policies. Before starting their working day (shift), employees undergo pre-shift and pre-trip check-ups. Dental services are available at three medical aid stations at Nornickel's production sites.

¹ Excluding one accident until its work-related status and severity are determined.
² The injury rate is calculated per million hours worked and takes into account the number of individuals affected by work-related lost-time injuries or fatalities as well as the number of medical treatment cases without lost time (i.e. beyond first aid).

Corporate Healthcare project

The Company has in place the Corporate Healthcare project across its key regions of operation, designed to set up a network of advanced healthcare centres with the latest medical equipment and highly qualified professionals.

237 types of services

>5,000 thousand healthcare services provided

21.5 thousand general practitioners' visits

As at the end of 2024, 31 medical facilities and 4 healthcare centres were put into operation. Performance of healthcare facilities in the Norilsk Industrial District and the Kola site from December 2021 to 31 December 2024:

14 focus areas

31.2 thousand paramedic visits

4.3 mln pre-trip and pre-shift check-ups

Housing programmes

The Company runs housing programmes (Our Home / My Home and Your Home) offering employees the opportunity to acquire

apartments in the Moscow and Tver Regions, Krasnodar Territory, and Yaroslavl on special terms.

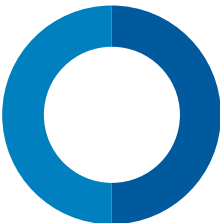
Our Home / My Home programme
Commercial lease agreements with a purchase option

Your Home programme
Sales and purchase agreement with payment by instalments

Participants: highly skilled and sought-after employees under 50 years of age with at least five years of continuous service, whose occupation/position falls within the priority focus areas.

Housing programmes co-financing mechanism

The Company pays up to 50% of the apartment cost, but in any case not more than RUB 3 million



The rest is paid by the employee within a certain period of employment with the Company (from five to ten years)

6,358

apartments provided to Norinckel employees since the start of the housing programmes (including 240 in 2024)

RUB

>28.8 bn

total investments in housing programmes (the purchase of apartments and infrastructure development)

24

business units and branches of the Norinckel Group covered by the programmes in Norilsk, the Taimyrsky Dolgano-Nenetsky Municipal District, Krasnoyarsk, and the Murmansk Region

Upholding the rights of local community members

For more details, please see Section 4.3, Rights of Indigenous Peoples.

As part of its commitment to respecting the rights of local communities, Norinckel identifies three key areas of focus: fostering a favourable social environment – through the management of positive social impacts and infrastructure projects; ensuring a favourable environmental context by reducing a negative environmental footprint; and a particular focus on engagement with indigenous communities.

Healthy social environment

For many years, Norinckel has prioritised creating conditions and opportunities for the residents of Norilsk, Monchegorsk, and other host areas.

Urban Environment Quality Index of the Russian Ministry of Construction, Housing, and Utilities is a tool for assessing the quality of the physical urban environment and the conditions for its development. The Index is assessed across 36 parameters, with an average score of 200 points for 2023 (out of a maximum of 360).

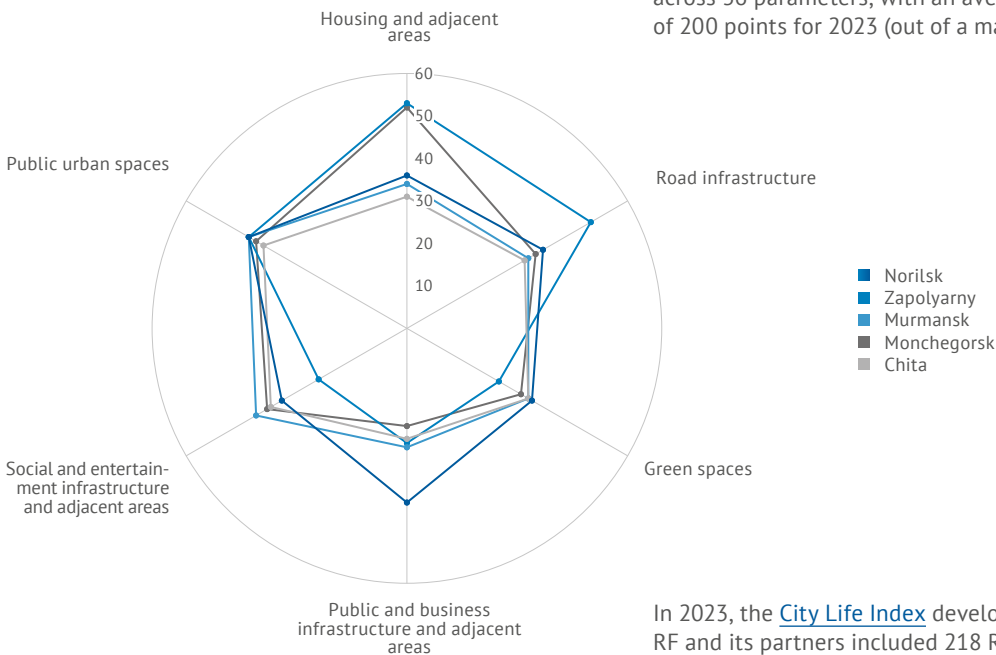
Monchegorsk
220 points

Norilsk
225 points

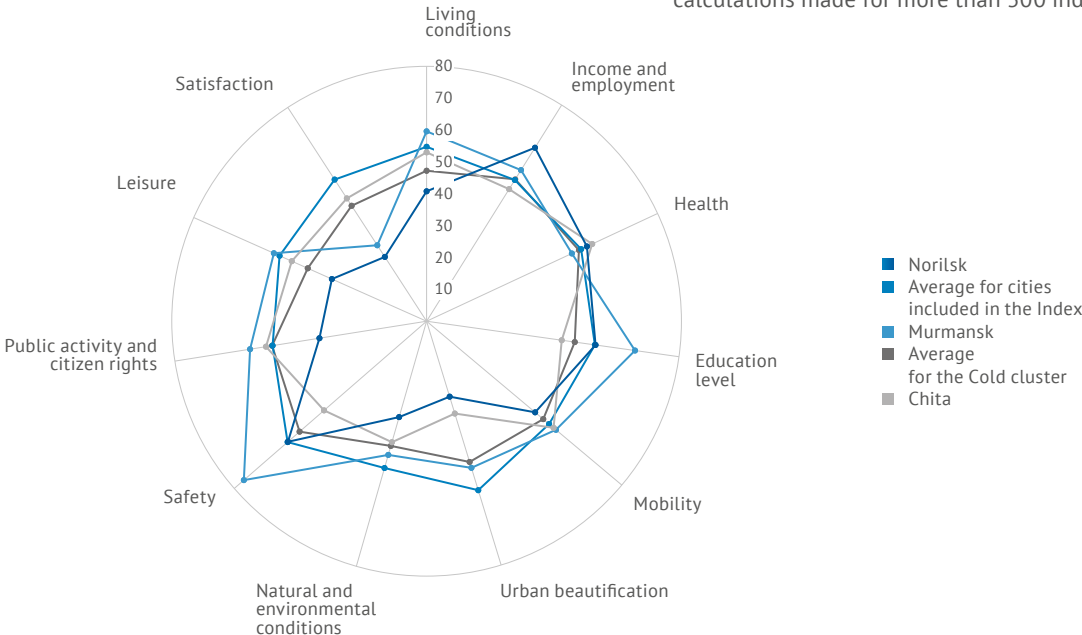
Zapolyarny
222 points

Murmansk
212 points

Chita
198 points



In 2023, the City Life Index developed by VEB. RF and its partners included 218 Russian cities, including Norilsk, Chita, and Murmansk, with assessments covering 11 focus areas and calculations made for more than 300 indicators.



The Company fosters dialogue with local communities, empowering residents to engage in decisions that impact their rights and interests. Through its ongoing support for urban development and entrepreneurship, the Company helps expand opportunities for self-fulfilment and a better quality of life for residents.

The World of New Opportunities flagship charitable programme run by Norickel since 2015 is the key tool to achieve this goal¹.

>21 thousand
people residing in the Company's regions of operations took part in the World of New Opportunities programme in 2024

4 dimensions
of the World of New Opportunities programme
DEVELOP!, INVENT!, ACT!, CREATE!

3 key target regions
the Krasnoyarsk Territory (Norilsk, Taimyrsky Dolgano-Nenetsky District), the Murmansk Region (Monchegorsk and the Pechengsky District), and the Trans-Baikal Territory (Chita and the Gazimuro-Zavodsky District)

RUB 388 mln
Total funding allocated in 2024

Activities of territorial development agencies

Local communities primarily engage in shaping the new appearance of their urban environments under Norickel's projects through urban

development agencies, which are established and supported by the Company.

Norilsk Development Agency

Monchegorsk Development Agency

Second School Centre for Community Initiatives of the Pechengsky District

These agencies offer educational, informational, advisory, marketing, and other forms of support to local residents; they also contribute to infrastructure development, the creation of business activity centres, and act as a liaison between government authorities and local

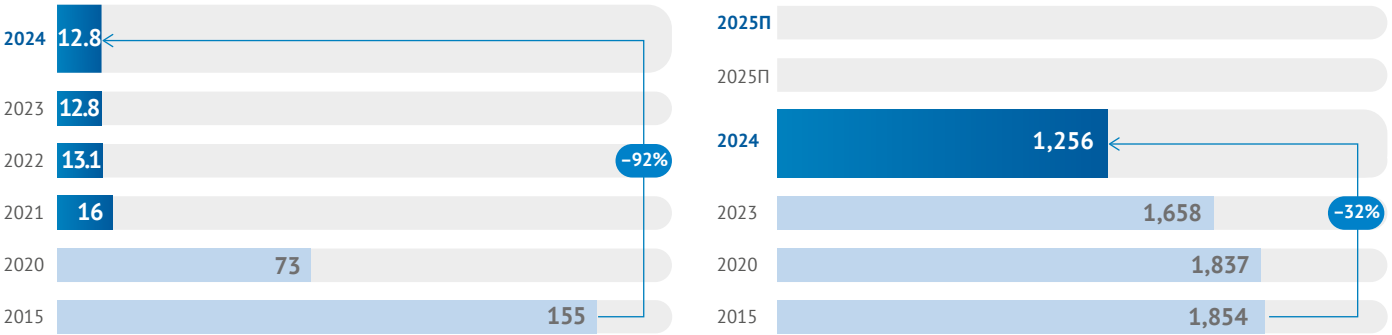
communities. They conduct large-scale population surveys and use the results to define the key areas of focus in their work.

Healthy environment

To improve local environmental conditions across its footprint, the Company is implementing a holistic Environmental and Climate Change Strategy. The Strategy covers all key areas related to the environment: air and water protection,

waste management, disturbed land rehabilitation, reforestation, and biodiversity conservation. To improve air quality in the Norilsk Industrial District and on the Kola Peninsula, the Company has been implementing the ambitious Sulphur Project¹ since 2015, aiming to phase out sulphur dioxide emissions by its Kola and Norilsk enterprises.

Results of the Sulphur Project



¹ For more details, please see the Company website at <https://norickel.com/sustainability/projects/sulphur/>.

By the end of 2021, all activities of the Sulphur Project at the Kola site had been completed, reducing emissions by more than 90% from a 2015 baseline. The project's activities at the Norilsk site are still ongoing. The first SO₂ capture and recovery

facilities were launched at Nadezhda Metallurgical Plant in 2023. In 2024, the Company succeeded in reducing emissions by 32% from a 2015 baseline, with the project still ongoing.

¹ For more details on the World of New Opportunities programme, please see the [programme's official website](#) and [the Company website](#) as well as a [dedicated article](#).

Air quality monitoring in Norilsk

In 2024, Nornickel created and launched an integrated air quality monitoring system for Norilsk residents. This is one of Russia's first projects and the first project in the Arctic zone enabling real-time assessment of urban air pollution levels.

To support the system's operation, 16 environmental monitoring stations were installed in the Norilsk Industrial District to measure the air content

of sulphur dioxide (SO₂), hydrogen sulphide (H₂S), carbon monoxide (CO), nitrogen dioxide (NO₂), and dust, as well as temperature, pressure and humidity. Information on the concentrations of measured substances is updated every 20 minutes, enabling residents to plan their day and avoid unnecessary outdoor activities during unfavourable meteorological conditions.

Rights of indigenous peoples

CHRB D.3.5

Nornickel acknowledges and respects both the collective and individual rights of the indigenous peoples as enshrined in Russian and international law. The Company honours the history, cultures, traditions, and ancestral lands of indigenous peoples – the Nenets, Enets, Dolgans, Nganasans, Evenks, and Sámi – recognising their distinctiveness, heritage, and ways of life inextricably tied to their natural environment.

Policy of engagement with indigenous peoples



In 2024, Nornickel's Board of Directors approved an updated

[Policy of Engagement with Indigenous Small-Numbered Peoples](#)

0 recorded cases of indigenous rights violations in 2024

Independent experts, tribal communities, and associations of indigenous minorities participated in updating the document, enabling the comprehensive alignment with international standards, the Company's experience in implementing support projects and programmes for indigenous minorities, and the specific needs and suggestions of the indigenous peoples of Taimyr and the Murmansk Region.

The implementation of the Company's policy of engagement with indigenous peoples, along with the integration of human rights-based approaches, enables Nornickel to build sustainable and trusting

relationships with indigenous communities. Nornickel continues to consistently advance initiatives for engagement with the indigenous small-numbered peoples of the North, building a sustainable framework to support their development and foster ongoing collaboration on joint projects.

In 2025, the programme's activities are focused on implementing the Company's Policy of Engagement with Indigenous Small-Numbered Peoples, with the aim of improving quality of life, developing social infrastructure, preserving traditional economic activities, and supporting indigenous culture.

Recognition and respect for self-determined development priorities

Acknowledgement of the vulnerability of indigenous minorities

Recognition of and respect for decision-making rights

Nornickel's commitments and principles regarding engagement with indigenous peoples

Commitment to culturally appropriate consultations, agreements, and disclosure of information

Advancing engagement with indigenous peoples

Funding of projects agreed with indigenous peoples

FPIC principle

CHRB A.1.3.a.EX

The FPIC principle lies at the heart of the Company's approach to engagement with indigenous peoples. This approach guarantees that:

- **free** engagement is free from intimidation, coercion, manipulation, or persecution;
- **prior** consent is sought at early stages of conceptualisation or development of project activities, and indigenous peoples have sufficient time to make an informed decision;
- **informed** participation is ensured through full disclosure of information regarding all material aspects of a proposed activity.

For more details on examples of obtaining FPIC from indigenous peoples, please see [Nornickel's 2023 Human Rights Report](#).

Programme to support indigenous peoples

In 2024, Nornickel completed its five-year programme to support the indigenous peoples of Taimyr. Performance under the programme was reviewed by the Sustainable Development and Climate Change Committee of MMC Norilsk Nickel's Board of Directors and at meetings of the Company's executive bodies. Its results were also presented to the wider public in early 2025. The Company spent over RUB 2 billion on the programme.

For more details on the performance under this programme, please see [Nornickel's 2024 Sustainability Report](#).

Achievements and performance



Living conditions
23% of the housing stock in Volochanka and Ust-Avam settlements was renovated, significantly improving living conditions



Medical care
First aid became more accessible, as the number of rural health posts in Taimyr settlements grew by 27%



Development of traditional trades
Traditional economic activities, such as reindeer herding and traditional crafts, are actively supported, contributing to the preservation of cultural traditions



Logistics and promotion of products
A robust infrastructure has been established to support the sale of products made by the indigenous peoples of Taimyr, contributing to the improvement of their economic well-being



In 2025, MMC Norilsk Nickel has remained committed to safeguarding the rights and supporting the development of the indigenous small-numbered peoples of the North through a range of focused initiatives in the following areas:

1. Liaison with federal institutions, e.g. an agreement with the Federal Agency for Ethnic Affairs (FAEA)

The Company engages in joint initiatives with the FAEA that focus on institutional development and the inclusion of indigenous minorities in decision-making processes concerning matters that impact their legitimate interests:

- The Indigenous Peoples of Russia – Social Diplomacy nationwide educational competition programme is aimed at enhancing the qualifications, leadership skills, and expert capacity of indigenous people;
- Support for expert workshops and analytical studies, including annual independent monitoring of business–indigenous peoples relations, based on the collective position of institutions representing the indigenous small-numbered peoples of the North.

2. Implementation of charitable programmes

Support for indigenous minorities is provided as part of the long-term corporate sustainable development program:

- The World of New Opportunities charitable programme provides institutional and infrastructural conditions for the sustainable development of communities across indigenous territories;

- The World of Taimyr grant competition aims to support initiatives led by indigenous minorities and non-governmental organisations in areas such as ethnic cultural development, environmental protection, education, traditional ways of life, and cultural and tourism projects.

3. Partnerships with indigenous associations and authorities of Russian regions

The Company is consistently strengthening its engagement with indigenous peoples through agreements with federal and regional indigenous associations as well as through support received from regional authorities.

Such engagement involves supporting agreed-upon projects, including initiatives aimed at:

- developing indigenous culture and traditional economic activities;
- organising and conducting socially significant events that foster interest in and help preserve traditional indigenous activities and culture;
- implementing infrastructure initiatives as part of long-term regional programmes for the social and economic development of Taimyr.

Indigenous Communities Coordination Council

In 2021, to foster systemic dialogue with the indigenous peoples of the Taimyrsky Dolgano-Nenetsky Municipal District and improve their quality of life, Nor Nickel established the Indigenous Communities Coordination Council, supervised by the head of the Norilsk Division. The Coordination Council oversees Nor Nickel's programmes to support the indigenous peoples of Taimyr. Community members may also provide feedback on the Company's initiatives and put forward their own suggestions. In total, the Council brings together 58 tribal communities engaged in traditional economic activities on the Taimyr Peninsula.

**RUB
400 mln**

additionally allocated by the Coordination Council to support tribal communities, ensure they have all the necessary supplies, and help them prepare for the hunting and fishing seasons in 2021–2024 (RUB 100 million annually)

The Company's Coordination Council, which includes representatives of tribal communities of Taimyr's indigenous peoples, implements targeted projects aimed at:

- facilitating traditional nature use by providing assistance to communities in preparation for the season of traditional economic activities (hunting, fishing);
- supporting educational initiatives – the Company has extended the Taimyr Students programme, which offers comprehensive assistance to indigenous students, into 2025.



Contribution to upholding the rights of supplier employees

CHRB B.1.4.b, B.1.7

The Company has in place the Supplier Code of Conduct of PJSC MMC Norilsk Nickel and Responsible Sourcing Policy of PJSC MMC Norilsk Nickel, setting out Nornickel's approach to environmental, social, and corporate governance issues throughout its supply chain. The documents set out the principles and commitments that the Company's suppliers are expected to follow in their operations, including a zero-tolerance approach to human rights violations.

Such violations include:

Any forms of torture, cruel, inhuman, and degrading treatment

Other gross human rights violations and abuses such as widespread sexual violence

Any forms of forced or compulsory labour

War crimes or other serious violations of international humanitarian law, crimes against humanity or genocide

The worst forms of child labour



Standard forms of agreements and contracts, as well as the General Contracting Terms and Conditions with suppliers, were amended to include a clause requiring compliance with the requirements listed in PJSC MMC Norilsk Nickel's Supplier Code of Conduct. This paragraph also informs providers about:

- the need to recognise and commit to generally accepted principles in human rights, labour relations, environmental protection, and anti-corruption, as stipulated by international regulations, and in particular, the UN Global Compact;
- the opportunity to report to Nornickel's Corporate Trust Line, which is the Company's principal grievance mechanism.

For more details, please see the Remedies and Grievance Mechanisms section.

As part of responsible supply chain management, Nornickel conducts annual due diligence on 100% of its suppliers, processors, and transporters of minerals, with human rights risks assessed using the OECD Guidance. Where such risks are identified and verified through audits, a corrective action plan is put in place. Should the risk escalate to a level deemed unacceptable, the contractual relationship with the supplier may be reconsidered. No relevant risks were confirmed under this system of audits from 2021 through the end of 2024.

UNGPs RF A2.3

The Company interacts with suppliers, including through training sessions and consultations, to raise awareness of responsible supply chain practices and strengthen their preparedness for due diligence and sustainability assessments.

For more details on how Nornickel manages its responsible supply chain, please see Nornickel's 2024 Responsible Supply Chain Report.

Contacts and sources of information about the report

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- rutube.ru/channel/24161124/

Corporate website

https://nornickel.com/

Human rights at Nornickel

https://www.nornickel.com/upload/files/ru/investors/reports-and-results/annual-reports/nn_human_rights_2024-eng.pdf

Nornickel's by-laws

https://nornickel.com/investors/disclosure/corporate-documents/#corporate-codes-and-policies

Nornickel's 2024 Sustainability Report

https://www.nornickel.com/upload/files/ru/investors/reports-and-results/annual-reports/annual_report_of_pjsc_mmc_norilsk_nickel_2024-eng.pdf

Nornickel's 2024 Responsible Supply Chain Report

https://www.nornickel.com/upload/files/ru/investors/reports-and-results/annual-reports/responsible_supply_chain_report_2024-eng.pdf

Nornickel's 2024 Climate Change Report

https://www.nornickel.com/upload/files/ru/investors/reports-and-results/annual-reports/climate_change_report_2024-eng.pdf

Abbreviations

AA1000SES	AA1000 Stakeholder Engagement Standard
CHI	Compulsory health insurance
CHRB	Corporate Human Rights Benchmark
CTL	Corporate Trust Line
ESG	Environmental, social, and governance
FIFR	Fatal injury frequency rate
FPIC	Free, prior and informed consent
FZ	Federal law
GRI	Global Reporting Initiative
ICMM	International Council on Mining and Metals
IFC	International Finance Corporation
ILO	International Labour Organization
IRMA	Initiative for Responsible Mining Assurance
ISO	International Organization for Standardization
KPI	Key performance indicator
LTIFR	Lost time injury frequency rate
PJSC	Public joint stock company
SO2	Sulphur dioxide
UN	United Nations
UNGPs	United Nations Guiding Principles on Business and Human Rights
VHI	Voluntary health insurance
VPSHR	Voluntary Principles on Security and Human Rights

Glossary

Business units	Subsidiaries of PJSC MMC NORILSK NICKEL
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 units
Corporate Trust Line	The Company's internal grievance mechanism for receiving and addressing complaints pertaining to breaches of ethics, security risks, and human rights violations
Grievance mechanism	Additional corporate procedure available to external stakeholders (local and indigenous communities, suppliers, or contractors, etc.)
Human rights	Rights that belong to every person in the world regardless of their origin, gender, ethnicity, religion, language, or 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
Human rights risk	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
Indigenous small-numbered peoples of the North	Peoples traditionally living within the Company's operating regions, who lead a traditional way of life and have a special legal status
Nornickel Group	PJSC MMC NORILSK NICKEL and its subsidiaries
Risk	The effect of uncertainty on objectives
Stakeholder engagement	The Company's activities aimed at identifying stakeholders' expectations and concerns and their engagement in the decision-making process
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

Indicators under the UN Guiding principles on business and human rights (UN Guiding Principles Reporting Framework)

Criterion	Section/Comment	Page
A – Governance of respect for human rights		
A1.1	Internal Documents on Human Rights	10
A1.2	List of Human Rights Priorities	8
A1.3	Stakeholder Engagement	20
A2 – Embedding respect for human rights		
A2.1	Stakeholder Engagement	20
A2.2	List of Human Rights Priorities	8
A2.3	Stakeholder Engagement; Contribution to Upholding the Rights of Supplier Employees	20 , 38
A2.4	Internal Documents on Human Rights	10
A2.5	Corporate Trust Line	21
B – Defining the focus of reporting		
B1	List of Human Rights Priorities	8
B2	List of Human Rights Priorities	8
B3	Nornickel defines salient human rights across its footprint	8
B4	The Company covers all salient human rights. No rights remain unaddressed	9
C – Management of salient human rights issues		
C1 – Specific policies		
C1.1	Internal Documents on Human Rights	10
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 2024 Sustainability Report	20
C2.2	Stakeholder Engagement	20
C2.3	Stakeholder Engagement	20
C3 – Assessing impacts		



Criterion	Section/Comment	Page
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 2024 Sustainability Report). Based on the survey results, employee engagement is mostly driven by factors such 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 2024	
C4 – Integrating findings and taking action		
C4.1	Management of Human Rights Risks	16
C4.2	Management of Human Rights Risks	16
C4.3	For more details, please see the Nornickel's Human Rights Achievements in 2024 section	26
C5 – Tracking performance		
C5.1	Respect for human rights is prioritised by the Company	
C6 – Remediation		
C6.1	Remedies and Grievance Mechanisms	21
C6.2	Remedies and Grievance Mechanisms	21
C6.3	Remedies and Grievance Mechanisms	21
C6.4	Remedies and Grievance Mechanisms	21
C6.5	The Company's response to issues reported to the Corporate Trust Line is described in more detail in the Nornickel's Human Rights Achievements in 2024 section	26

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	Internal Documents on Human Rights	10
A.1.2.a. Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	Internal Documents on Human Rights. For more details, please see MMC Norilsk Nickel's Human Rights Policy	10
A.1.2.b. Commitment to respect the human rights of workers: Health and safety and working hours	Internal Documents on Human Rights. For more details, please see MMC Norilsk Nickel's Human Rights Policy	10
A.1.3.a. Commitment to respect human rights particularly relevant to the sector: Land, natural resources, and indigenous peoples' rights	Rights of Indigenous Peoples. For more details, please see MMC Norilsk Nickel's Human Rights Policy	34
A.1.3.b. Commitment to respect human rights particularly relevant to the sector: Security	Commitment to Human Rights	6
A.1.4. Commitment to remedy	Corporate Trust Line	21
A.1.5. Commitment to respect the rights of human rights defenders	Corporate Trust Line	21
A.2. Board level accountability		
A.2.1. Commitment from the top	Governance Structure, Responsibilities, and Oversight of Human Rights; Stakeholder Engagement	12 , 20
A.2.2. Board responsibility	Governance Structure, Responsibilities, and Oversight of Human Rights	12
A.2.3. Incentives and performance management	Governance Structure, Responsibilities, and Oversight of Human Rights; Management of Human Rights Risks	12 , 16
A.2.4. Business model strategy and risks	Governance Structure, Responsibilities, and Oversight of Human Rights	12
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	Governance Structure, Responsibilities, and Oversight of Human Rights	12
B.1.2. Incentives and performance management	Governance Structure, Responsibilities, and Oversight of Human Rights	12
B.1.3. Integration with enterprise risk management	Identification and Assessment of Human Rights Risks and Impacts	16

Indicator	Section/Comment	Page
B.1.4.a. Communication/dissemination of policy commitment(s): Workers and external stakeholders	Stakeholder Engagement	20
B.1.4.b. Communication/dissemination of policy commitment(s): Business relationships	Contribution to Upholding the Rights of Supplier Employees	38
B.1.5. Training on human rights	Human Rights Training	18
B.1.6. Monitoring and corrective actions	Remedies and Grievance Mechanisms	21
B.1.7. Engaging and terminating business relationships	Contribution to Upholding the Rights of Supplier Employees	38
B.1.8. Approach to engaging with affected stakeholders	Stakeholder Engagement	20
B.2. Human rights due diligence		
B.2.1. Identifying human rights risks and impacts	Identification and Assessment of Human Rights Risks and Impacts	16
B.2.2. Assessing human rights risks and impacts	Identification and Assessment of Human Rights Risks and Impacts	16
B.2.3. Integrating and acting on human rights risks and impact assessments	Identification and Assessment of Human Rights Risks and Impacts	16
B.2.4. Tracking the effectiveness of actions to respond to human rights risks and impacts	Management of Human Rights Risks	16
B.2.5. Communicating on human rights impacts	Stakeholder Engagement	20
C: Remedies and grievance mechanisms		
C.1. Grievance mechanism(s) for workers	Remedies and Grievance Mechanisms	21
C.2. Grievance mechanism(s) for external individuals and communities	Remedies and Grievance Mechanisms	21
C.3. Users are involved in the design and performance of the mechanism(s)	Remedies and Grievance Mechanisms	21
C.4. Procedures related to the grievance mechanism(s) are equitable, publicly available, and explained	Remedies and Grievance Mechanisms	21
C.5. Prohibition of retaliation for raising complaints or concerns	Remedies and Grievance Mechanisms	21
C.6. Company involvement with state-based judicial and non-judicial grievance mechanisms	Remedies and Grievance Mechanisms	21
C.7. Remedying adverse impacts	Remedies and Grievance Mechanisms	21
C.8. Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	Corporate Trust Line	21

¹ In own extractive operations, which includes JVs.

Indicator	Section/Comment	Page
D: Company human rights practices		
D.3.1. Living wage ¹	Key Figures of the Report	2
D.3.2. Transparency and accountability ¹	Nornickel discloses production results and accounting statements prepared under the RAS and IFRS on the Company website	
D.3.3. Freedom of association and collective bargaining ¹	Respecting Employee Rights (the Collective Bargaining Agreement subsection)	28
D.3.4. Health and safety: Fatalities, lost days, injury, occupational disease rates ¹	Respecting Employee Rights (the Health and Safety subsection)	29
D.3.5. Indigenous peoples’ rights and free prior and informed consent (FPIC) ¹	Rights of Indigenous Peoples	34
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 consistent 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 2024 Sustainability Report	
D.3.7. Security ¹	Respecting Employee Rights (the Health and Safety subsection)	29
D.3.8. Water and sanitation ¹	In 2024, 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	Respecting Employee Rights (the Maternity and Childhood Protection subsection)	28
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 steps to prevent re-occurrence		
E.3. The company has engaged with affected stakeholders and taken appropriate actions to provide for or cooperate in remedy(ies)		

¹ In own extractive operations, which includes JVs.



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Review
by the UN Global Compact Network Russia
for MMC Norilsk Nickel’s 2024 Human Rights Report

The release of Nornickel’s Human Rights Report carries particular importance amid current global challenges and Russia’s evolving national priorities. In a world grappling with numerous conflicts resulting in various forms of human rights violations, while economies face a period of turbulence testing their resilience, socially responsible business conduct is evolving from being a mere component of corporate ethics into a strategic driver of sustainable growth.

Russia upholds internationally recognised human rights principles as ratified in its international treaties and, like many other nations, pursues its national sustainable development goals, including the promotion of decent work, environmental protection, and support for indigenous peoples.

For Nornickel, the Report’s publication is an opportunity not only to reaffirm its commitment to international standards but also to boost its reputation among investors, partners, and broader society. This is already the third Human Rights Report prepared by the Company in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs) and the Corporate Human Rights Benchmark (CHRB). In the Report, the Company also reflects and discloses its contribution to advancing Russia’s national projects.

The Company’s approach to upholding the rights of the indigenous peoples of the North deserves special recognition. Nornickel rolls out best practices across areas of traditional nature use, including the application of the free, prior, and informed consent (FPIC) procedure in strict compliance with international standards (ILO Convention No. 169, UN Declaration on the Rights of Indigenous Peoples). This approach allows Nornickel not only to comply formally with legal requirements but also to build partnerships with local communities through:

- regular consultations with indigenous communities throughout the project implementation period
- creation of special development foundations and support for traditional trades
- educational initiatives and programmes to preserve cultural heritage
- transparent grievance and remediation mechanisms.

To strengthen its contribution to the human rights agenda, we recommend that Nornickel more actively involve independent experts in assessing its operations, expand engagement with international organisations, and increase disclosure around corporate supply chain due diligence procedures, environmental impacts, and impacts on local communities. This review itself serves as an example of expert engagement, demonstrating the value of external assessments. Taking such steps will help enhance stakeholder confidence in the Company’s reporting and overall activities, reinforcing its position as a leader in corporate social responsibility.

In the current environment, publishing a human rights report is not merely a reporting exercise but a vital step towards building a sustainable, socially oriented business model. By aligning with international standards and embracing national priorities, Nornickel enhances its own reputation while fostering greater trust in Russian business both domestically and internationally. This commitment is reflected in the Ten Principles of the UN Global Compact, which cover human rights, labour, environment, and anti-corruption. Such an approach is particularly meaningful in today’s global context, highlighting the Company’s relentless focus on advancing the sustainability agenda and its commitment to corporate social responsibility, where the principle of caring for people is embedded as a top priority across all business processes and partnerships. Importantly, responsible

disclosure of information on human rights makes a substantial contribution to the reputational capital of both Norinickel and Russia as a whole.



Natalia Dorpeko
Executive Director
UN Global Compact Network Russia

Disclaimer

The information contained herein relies on the data available to PJSC MMC NORILSK NICKEL as at the date of this 2024 Human Rights Report. After this Report was prepared, the Company's operations as well as forecasts and overview of the current situation presented in the Report may have been affected by external or other factors, including:

- 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 as well as Russian individuals and legal entities;
- the Russian Federation's response to sanctions;
- economic and other measures introduced to maintain the economic and financial stability of the Russian Federation;
- 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 in this Report are provisional and subject, among other things, to a number of economic, political, and legal factors, including those beyond Norinickel'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 in this Report.

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. Information about the market share and other 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 verified by independent experts, 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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