



Sustainability Report 2022
Human Rights Report



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About the Report

MMC Norilsk Nickel is a Russian diversified metals and mining company, the world's largest producer of palladium and high-grade nickel, and a major producer of platinum, cobalt, copper, and rhodium.

Nornickel's operations may impact human rights across the Group's footprint. We value and respect the rights of all our employees, local communities, and other stakeholders.

and Human Rights (UNGPs), the Initiative for Responsible Mining Assurance (IRMA), the International Council on Mining and Metals (ICMM), and the Corporate Human Rights Benchmark (CHRB).

The Company's production facilities are located in Russia in the Norilsk Industrial District, on the Kola Peninsula and in the Trans-Baikal Territory, as well as in Finland.

It is the first time in the Company's history that we have published Norilsk Nickel Group's 2022 Human Rights Report to disclose our corporate approach to human rights. The Report outlines Nornickel's key human rights activities and shows how they are integrated into business processes and aligned with broader sustainability initiatives.

This Report complements [Nornickel's 2022 Sustainability Report](#).

The Company plays an important role in the social and economic development of the regions where it operates, and is a major taxpayer and employer (with the average headcount of 78,400 people in 2022). Most of the Group companies form the backbone of local economies.

This Report provides information on the Group's compliance with key international and industry human rights standards, such as the UN Guiding Principles on Business

Statement of the Vice President for Investors and Sustainable Development

At Nornickel, our commitment to human rights goes beyond mere compliance with the Constitution of the Russian Federation and the universally recognised principles of international law. It is our philosophy to unlock each employee's potential so that every our employee can live and work with dignity. The well-being of our workforce and all stakeholders is our highest value and our most vital asset in facilitating the Group's sustainable development.

Vladimir Zhukov,
Vice President for Investors and Sustainable Development



Nornickel and human rights agenda

Human rights in the sustainable development agenda

Human rights are rights that belong to every person in the world whatever their origin, gender, ethnicity, religion, language and status. According to the Universal Declaration of Human Rights, the core human rights include:

- Right to life
- Right to a fair trial
- Right to food
- Right to health
- Right to adequate housing
- Right to an adequate standard of living
- Right to education
- Right to family life
- Right to freedom from discrimination
- Right to freedom from slavery and forced labour
- Right to freedom from torture or cruel, inhuman or degrading treatment or punishment
- Right to freedom of association and collective bargaining
- Right to freedom of movement
- Right to freedom of opinion, expression, thought and religion
- Right to intellectual property
- Right to life, liberty and security of person
- Right to property
- Right to participate in cultural life
- Right to privacy
- Right to public participation
- Right to just and favourable conditions of work

The United Nations (UN) is a central human rights institution across the globe. One of the great achievements of the United Nations is the creation of a comprehensive body of human rights law – a universal and internationally protected code to which all nations can subscribe and all people aspire. The UN has defined a broad range of internationally accepted rights, including civil, cultural, economic, political and social rights. It has also established mechanisms to promote and protect these rights and to assist states in carrying out their responsibilities.

The foundations of this body of law are the Charter of the United Nations and the Universal Declaration of Human Rights. The United Nations has gradually expanded human rights law to encompass specific standards for women, children, persons with disabilities, minorities and other vulnerable groups, who now possess rights that protect them from discrimination that had long been common in many societies.

Human rights in the global sustainable development agenda

In 2015, the UN General Assembly adopted 15 Sustainable Development Goals (SDGs) which lie at the heart of the global 2030 Agenda. 17 goals are decomposed into

169 targets and 232 indicators nearly all of which are related to human rights and reflect the provisions of relevant international regulations.

While making progress towards SDGs, nations are also moving towards fulfilment of their obligations with respect to human rights.

13 SDGs are related to human rights



4 SDGs are indirectly linked to the human rights agenda



Human rights in business

Business enterprises can have a direct or indirect impact on the entire range of internationally recognised human rights of their own employees and employees along the supply chain, customers, local communities and end users of products or services.

In accordance with human rights principles and standards set out in international laws, nations assume obligations to protect human rights from infringement by third parties, including businesses, on their territory or jurisdiction. All business enterprises must respect and protect

human rights, which means they must not tolerate breaches of human rights and adversely impact their exercise. In case of breaches they must secure access to effective remedies based on court and out-of-court resolution mechanisms.

Protection of human rights in business



The underlying international documents setting out principles and approaches to human and labour rights for businesses are as follows:

- The UN Guiding Principles on Business and Human Rights (UNGPs) – UN recommendations for businesses, including public commitments to respect human rights, act with due diligence to avoid infringing on human rights and providing access to remedies;
- OECD (Organisation for Economic Co-operation and Development) Guidelines for Multinational Enterprises – recommendations on responsible business conduct for multinational enterprises;

- the International Labour Organisation Declaration on Fundamental Principles and Rights at Work – a basic document in labour rights regulating labour relations.

In addition to the underlying documents, there are also standards related to human rights of certain vulnerable groups, including, but not limited to, the Convention on the Elimination of All Forms of Discrimination Against Women, the United Nations Convention on the Rights of Persons with Disabilities, United Nations Declaration on the Rights of Indigenous Peoples, Declaration on the Rights of Persons Belonging to National or Ethnic,

Religious and Linguistic Minorities, the International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families, and other documents.

Nornickel's approach and commitments

Nornickel wholeheartedly respects and promotes human rights and freedoms in line with internationally recognised norms

and practices. We comply with Russian laws and principles and requirements of the international law, and seek to adopt best

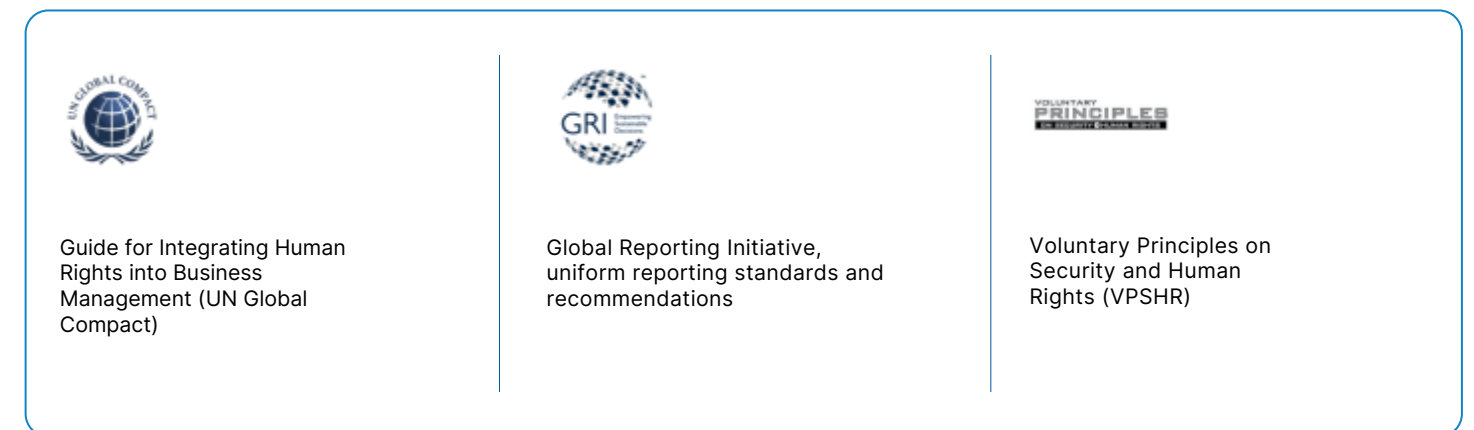
industry practices, recommendations and initiatives. To this effect, we have set up a human rights due diligence system.

Key human rights initiatives and declarations guiding Nornickel activities

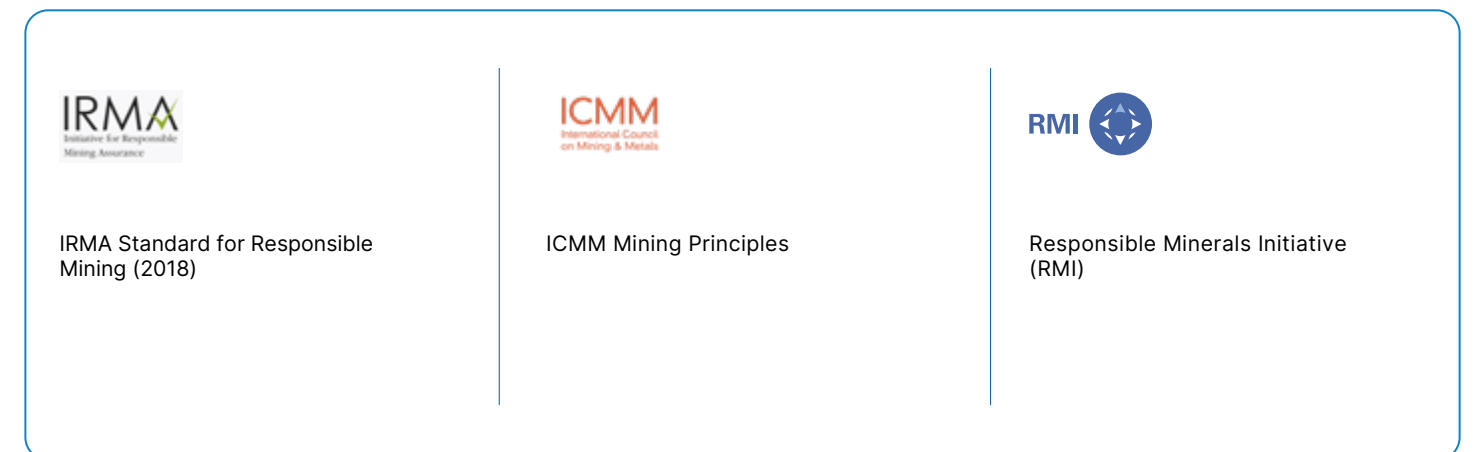
International and Russian initiatives



Practical recommendations



Industry-specific initiatives



Assessment of mining assets readiness for IRMA certification

In 2022, Nornickel held an independent assessment to understand the degree to which its mining assets are ready for IRMA certification. The independent assessment was conducted by ENSOR Management Consultants LLC (formerly a branch of Environmental Resources Management, an international consultancy firm), which has many years of track record in assessing and managing environmental and social risks. The assessment perimeter included eight key mines of Norilsk and Kola divisions. Their activities were assessed based on four principles: business integrity, planning for positive legacies, social responsibility, and environmental responsibility.

The assessment showed that in the event of an official certification exercise, the Company would have likely met the requirements of the IRMA Transparency level. In 2023, Nornickel will keep working to put into action a roadmap of corrective actions and ensure compliance with the IRMA requirements.



Nornickel stance

IRMA 3.1.7.2, IRMA 3.1.7.3, IRMA 3.1.8.1, ICMM PE 3.4

The Company does not tolerate any forms of discrimination and does not use forced or child labour, giving every employee an equal opportunity to exercise their labour rights regardless of gender, race, nationality, origin, financial, social, and occupational status, age, domicile, religion, political beliefs, and other circumstances not related to professional qualities.

CHRB A.1.3.b

No operations are run in, and no raw materials are procured from, areas involved in military conflicts. Nornickel expects its suppliers and contractors to respect human rights throughout their operations.



Statement from the Senior Vice President — Head of HR, Social Policy and Public Relations

Nornickel is a large business employing 80,000 people. They work at sites located in Russia's far-flung areas with harsh climate, and the nature of their work requires maximum concentration. Given our stringent requirements as an employer, we must show the same level of commitment, transparency and respect. That is why we place a strong emphasis on offering our employees decent salaries, comfortable living conditions and self-fulfilment opportunities. This is how we understand human rights. And it is our responsibility and commitment to uphold them.

Larisa Zelkova,
Senior Vice President — Head of HR, Social Policy and Public Relations



Statement from the Senior Vice President – Operational Director

Employee health and safety is our strategic priority. We strive to achieve zero fatalities.

Sergey Stepanov,
Senior Vice President – Operational Director



Statement from the Vice President for Federal and Regional Programmes

The aim of engaging with local communities and indigenous minorities is to develop regions where our sites are located and protect the right of local residents. We have put in place an entire system of providing stakeholders with access to a dedicated grievance mechanism to guarantee legal protection and ensure open feedback. Nornickel is actively investing in community development programmes. A comprehensive development plan for Norilsk is a great example of these efforts. Our responsible approach to human rights is also evidenced through such activities as obtaining indigenous peoples' free, prior, and informed consent to establishing a new Tukhard settlement, use of an independent grievance mechanism involving a human rights organisation, and extensive negotiations with local communities to get ready for the same process in the Murmansk Region.

Andrey Grachev,
Vice President for Federal and Regional Programmes

Governance, responsibilities and oversight

Nornickel seeks to ensure respect for human rights by putting in place effective management mechanisms and controlling the adequacy of decision-making processes.

The Company has a clear governance structure with a defined hierarchy for reporting and escalating concerns about human rights issues. The Board of Directors and the Management Board consider human rights risks when reviewing comprehensive reports.

CHRB A.2.4

The Sustainable Development and Climate Change Committee of the Board of Directors monitors the effectiveness and efficiency of major amendments to approved strategies, goals, programmes, projects and other significant initiatives adopted with regard to human rights. The Audit Committee regularly reviews reporting on complaints received through the Corporate Trust Line.

The Risk Management Service monitors key risk management initiatives, including those identified in the process of stakeholder engagement regarding the respect for and protection of human rights, and develops company-wide methodological principles and approaches to risk management. In case of a human rights violation, any stakeholder can contact the Corporate Trust Line and use a grievance mechanism.

→ For more details, please see the [Stakeholder Engagement section](#).

The Company conducts regular surveys of employees and the sentiment of local communities and indigenous peoples to assess engagement and listen to the interests, opinions and preferences of its stakeholders. The Company guarantees anonymity for whistle-blowers and respondents.

In 2022, the Company held the first-ever independent assessment of its impact on human rights, including an in-depth analysis of risks at the level of divisions and business units.

→ For more details, see the [Identification and Assessment of Human Rights Risks and Impacts section](#).

CHRB A.2.3, B.1.2

To integrate the engagement principle into sustainable development management, in particular as regards human rights, health and safety indicators linked to FIFR were included in the annual team KPIs of the top management (with a relative weight of 30%).

The Company also put in place incentives linked to the Company's human rights commitments and targets for managers

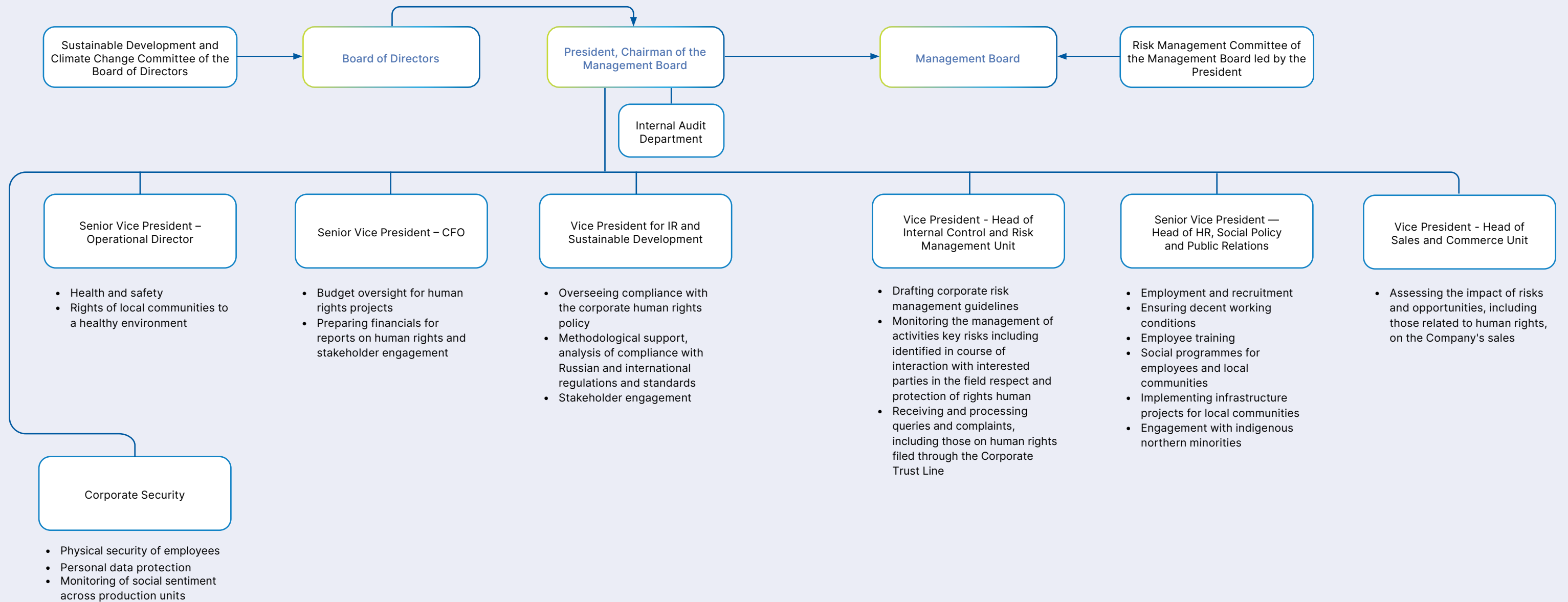
and white-collar employees. They include bonuses for identifying OHS and labour risks and proposals for their minimisation.

→ For more details, please see the [Employee Right to Safety, Including Occupational Health and Safety section](#).



Governance structure, responsibilities and oversight of human rights¹

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



¹ For the key functional responsibilities at different governance levels, please see the 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

Human Rights Due Diligence System

The human rights due diligence procedure is a mechanism for assessing impacts and risks in the value chain and conducting business responsibly in order to prevent, mitigate the risk of, and hold perpetrators

accountable for human rights abuses occurring in business operations and relationships. The procedure relies on the UN Guiding Principles on Business and Human Rights (UNGPs).

In 2022, Nornickel started comprehensive arrangements to develop and implement the Human Rights Due Diligence System for 2022–2024.

Key objectives of Nornickel's Human Rights Due Diligence System



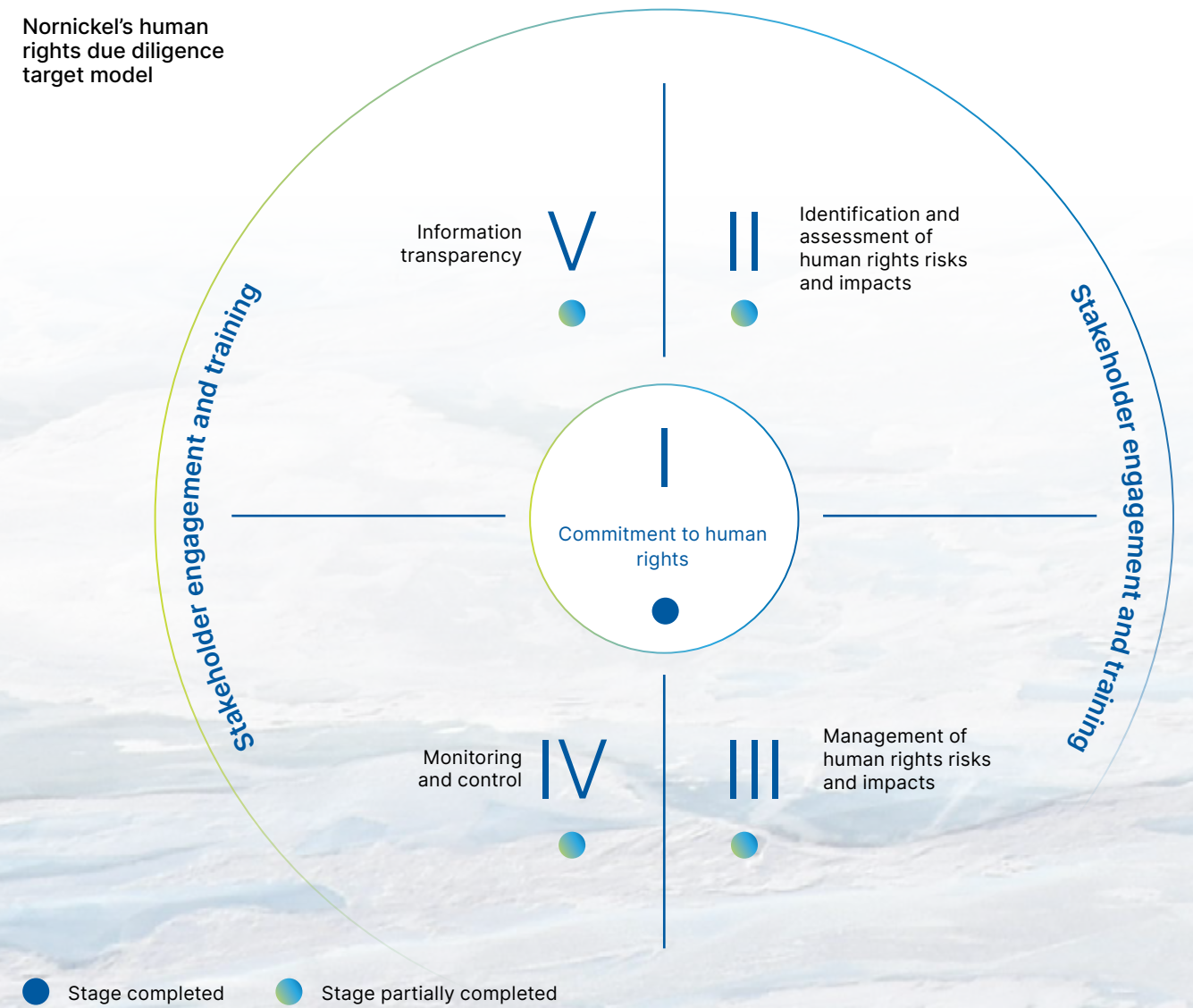
In 2022, Nornickel built a five-stage target model for the human rights due diligence procedure.

Each stage has a description of relevant measures, their timing and outcomes, and a specific architecture of dedicated documentation and responsible officers.

Stakeholder engagement (definition of stakeholder concerns and categories, engagement formats and frequency) and stakeholder training (definition of training formats, trainee categories and frequency of educational events) are embedded into all stages of the target model.

As at the end of 2022, the following initiatives had been implemented: all of the Stage I activities ([Commitment to Human Rights](#) section) and a majority of the Stage II activities ([Identification and Assessment of Human Rights Risks and Impacts](#) section). As at the Report publication date, the Stage III, IV, and V activities were underway, with plans to complete their implementation in 2023–2024.

Nornickel's human rights due diligence target model



Commitment to human rights

CHRB A.1.1, A.1.2.a, A.1.2.b
IRMA 1.3.1.1, 1.3.1.2
ICMM PE 3.1

Nornickel respects human rights and freedoms in accordance with the generally accepted standards, principles, initiatives and rules of international law and adheres

to the regulatory requirements adopted in Russia and other countries within the Company's footprint.

The Group has put in place a comprehensive structure of sustainability policies. The underlying principles, obligations, initiatives and management subjects in the realm of human rights

are described in MMC Norilsk Nickel's Human Rights Policy, which was updated in 2021¹ and approved by the resolution of Nornickel's Board of Directors.

MMC Norilsk Nickel's Human Rights Policy seeks to prevent and minimise human rights violations across the Group and its supply chain.

¹ MMC Norilsk Nickel's Human Rights Policy is available on the Company's website at https://www.nornickel.com/upload/iblock/df8/PJSC_MMC_Norilsk_Nickel_Human_Rights_Policy.pdf.

MMC Norilsk Nickel's Human Rights Policy applies to all of the Company's production processes, including exploration, mining, smelting, refining, manufacturing of finished goods, marketing and sales of non-ferrous and precious metals. The Policy:

- is binding on all employees of the Company;
- formalises the commitment of contractors and suppliers to comply with the Policy's principles and provisions, with similar requirements set out in the responsible supply chain documents and policies;
- makes references to international human rights documents, including the UN Universal Declaration of Human

Rights, ILO Conventions, UN Sustainable Development Goals, International Financial Corporation's Environmental and Social Performance Standards, UN Guiding Principles on Business and Human Rights (UNGPs), Voluntary Principles on Security and Human Rights (VPSHR), ISO 26000:2010 and AA1000SES (2015);

- is linked to other by-laws of the Company, including the Business Ethics Code, Equal Opportunities Programme, Working Conditions Policy, Freedom of Association Policy, Community Engagement Policy, and Indigenous Peoples' Rights Policy.

In 2021–2022, the architecture of Nornickel's sustainability policies¹ was significantly enhanced through the adoption of new policies, review of the existing by-laws, and organisation of stakeholder consultations on newly adopted policies with a focus on implementation initiatives and plans. According to the Company's internal estimates, the number of commitments enshrined in the policy architecture is in line with the above requirements.

Types of human rights prioritised by Nornickel

Employees	Local communities	Counterparties
<p>Fundamental rights</p> <ul style="list-style-type: none"> • Right to life • Right to freedom • Right to privacy and security of the 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 fair and decent remuneration • Right to fair and favourable working conditions • Right to social security • Right to a reasonable work schedule • Right to regular paid leaves • Ban on forced labour <p>Right to safety, including occupational health and safety</p> <p>Freedom of association and collective bargaining</p> <p>Right to the protection of family, maternity and childhood</p> <p>Rights of employees and external stakeholders to a healthy environment</p>	<p>Rights of local and indigenous communities</p> <p>Requirements for suppliers to respect human rights as part of supply chain responsibility commitments</p>

Through the Company's website, Nornickel's by-laws are made available to a wide range of stakeholders¹.

The Company's Sustainable Development Department exercises control over progress against Stage I of the target due diligence model.



Identification and assessment of human rights risks and impacts

CHRB B.1.3, IRMA 1.3.2.1, IRMA 3.3.1.1

In 2022, Nornickel initiated and completed its first ever preliminary assessment of human rights impact. For the purposes of the assessment, the Company used the methodology of the Danish Institute for Human Rights² (as recommended by IRMA), which was adapted to the operating activities

of Nornickel. Note that this methodology was developed as a general model for application. In line with the IRMA recommendations, assessments of impacts produced by individual production assets in large-scale mining projects may require a scale-up of the methodology subject to the company's size and severity of human rights risks and implications.

The assessment was carried out by the business units of Nornickel's Head Office (Moscow), Polar Division (Norilsk), Kola MMC (Murmansk), and GRK Bystrinskoye (Trans-Baikal Territory).

Stages and elements of human rights impact assessment

Stage 1. Policy assessment	Stage 2. Risk assessment	Stage 3. Impact assessment at the level of production units
<ul style="list-style-type: none"> • Detailed review of the architecture of Nornickel's sustainability policies and correlation between them, including analysis of compliance with the UN Guiding Principles on Business and Human Rights (UNGPs); • preliminary risk assessment; • analysis of legal and political landscapes in terms of human rights in the key markets; • analysis of gaps in the architecture of Nornickel's sustainability policies. 	<ul style="list-style-type: none"> • In-depth analysis of specific human rights risks and relevant mitigation/prevention measures; • preparations for the human rights due diligence procedure. 	<ul style="list-style-type: none"> • Assessment of human rights impacts at the level of divisions / production units, and analysis of relevant risks and tools used to prevent violations of human rights; • development of detailed mitigation, monitoring, control, prevention and remediation recommendations for divisions / production units; • development of recommendations on embedding human rights risk assessments into the corporate risk management framework based on the status-quo analysis at the level of divisions / production units.

¹ All of the Company's by-laws are available on its official website at <https://www.nornickel.com/investors/disclosure/corporate-documents/>

² Danish Institute for Human Rights <https://www.humanrights.dk>.

CHRB B.2.1, B.2.2, IRMA 1.3.3.3

Based on analysis of submitted documents and more than 100 interviews with the Company's employees and stakeholders, we identified key risks and impacts by the type of relevant human rights.

Nornickel's exposure to human rights risks in Russia is limited. The key focus areas are occupational health and safety and environmental impact. Risks related to local communities and safety are limited in the majority of cases.

Material human rights risks

Right	Risks	Impact assessment	Risk management measures	The Company's by-laws
Employee right to safety, including occupational health and safety	Group fatality	Extremely high	<ul style="list-style-type: none"> Enhance methodological support for health and safety functions Develop a system for assessing and managing production risks Ensure continuous and regular controls over compliance with the health and safety requirements Pursue continuous training 	<ul style="list-style-type: none"> Risk Management Policy Risk Management Regulations Corporate Risk Management Framework Regulations Human Rights Policy Stakeholder Engagement Policy Occupational Health and Safety Policy Regulations on the OHS Safety Management System Regulations on the Health and Safety Management System Responsible Sourcing Policy Supplier Code of Conduct Know Your Supplier questionnaire, including sustainability matters Standard supplier contract form Environmental Policy Environmental Impact Assessment Policy Climate Change Policy
	Strained social and labour relations	Medium	<ul style="list-style-type: none"> Conduct regular social monitoring Maintain dialogue with trade unions Monitor the activities of social partnership participants Develop and implement corporate social programmes to encourage long-term employment Provide information and communication support in case of emergencies Develop and implement the regional social policy Develop and implement programmes to improve living standards in the regions where the Company operates Collect pre-emptive data on potential social tensions in the labour force 	
Requirements for suppliers to respect human rights as part of supply chain responsibility commitments	Failure to comply with the requirements put forward by leading ESG standards and associations	High	Conduct due diligence of mineral feedstock suppliers ¹	

For more details on risk mitigation and positive impact enhancement initiatives in this area, please see the [Projects to Support Human Rights Principles and Key 2022 Highlights](#) section.

As a way to minimise its risks, the Company develops action plans to manage relevant risks and monitors performance under these plans on a regular basis. Based on the preliminary assessment, Nornickel's human rights impact on key stakeholders and the Company's exposure to human rights risks was scored as "Low".

The Company will continue improving the procedure for ongoing screening of human rights risks and impacts. In 2023, it plans to finalise the human rights impact assessment by considering the stakeholder opinions.

Right	Risks	Impact assessment	Risk management measures	The Company's by-laws
Rights of employees and external stakeholders to a healthy environment	Environmental damage caused by emergencies	Extremely high	<ul style="list-style-type: none"> Develop a comprehensive system of regulatory and procedural guidelines on environmental protection Deliver on environmental initiatives Implement the Environmental and Climate Change Strategy 	<ul style="list-style-type: none"> Environmental and Climate Change Strategy Indigenous Peoples' Rights Policy Community Engagement Policy Position Statement on Biodiversity Position Statement on Water Stewardship
Rights of local and indigenous communities	Risk of adverse impacts on the rights of local and indigenous communities	Low	<ul style="list-style-type: none"> Monitor impacts within and beyond the sanitary protection zones of relevant production facilities Hold regular discussions with stakeholders on legacy and outdated production facilities in the run-up to the implementation of growth plans and new projects Run programmes to support traditional trades, enable processing activities, and enhance housing, social and medical infrastructure in relevant settlements 	

¹ Hereinafter, mineral raw material suppliers means suppliers, transporters, and processors of nickel-, cobalt-, and copper-containing minerals mineral raw materials.

Management of human rights risks

Nornickel has a unified corporate risk management framework, which is integrated into all of the Company's business processes and allows for risk-oriented decision-making at various levels to achieve strategic and operational goals.

Similarly to risk owners who are responsible for risk identification and assessment and risk response based on preventive and other initiatives designed to effectively hamper the materialisation of relevant risks, the Risk

Management Service plays a crucial role in providing efficient methodological support to risk management.

The risk management structure offers a conceptual, regulatory and methodological framework, organisational tools and information infrastructure to manage Nornickel's risks through an automated GRC system. A consistent and holistic risk management approach enables risk owners to identify, analyse, assess and rank risks

in business units, develop and implement risk response plans, deliver on action level (including mitigation in line with the Company's risk appetite metrics), prepare risk reports, and monitor changes. For more details on the Company's risk management system, please see [Nornickel's 2022 Sustainability Report](#), Internal Control and Risk Management section.



Stakeholder engagement

CHRB B.1.8, IRMA 1.2.2.2, ICMM PE 10.1

To guarantee successful progress against all stages of human rights due diligence, we pay close attention to timely and efficient stakeholder engagement in a variety of formats, including preparation of materials, development of documents, awareness raising efforts (official website, mass media), training, personal meetings, public discussions, and report disclosures.

Stakeholder engagement is an ongoing process run by the Company to ensure timely and full recognition and consideration of all stakeholder interests and proposals, and respect for the rights of employees, shareholders, investors, business partners, local communities, indigenous peoples, Russian and international non-profit organisations. Nornickel puts a lot of effort into improving the quality of stakeholder relationships to build long-term mutually beneficial partnerships. As of today, the Company has not registered any grievances on disrespectful treatment of stakeholders.

The Company's stakeholder engagement ethics, principles and procedures are set out in Nornickel's Business Ethics Code, Human Rights Policy, Community Engagement Policy, etc¹. In 2021, Nornickel developed and approved its first ever Stakeholder Engagement Policy, which provides a description of engagement commitments, principles and management

vertical. The Company also complies with international stakeholder engagement standards.

The Company identifies, classifies and analyses stakeholders in line with AA1000SES.

Pursuant to Nornickel's Stakeholder Engagement Policy, in 2022 the Company started drafting annual Stakeholder Engagement Plans, which include an assessment of stakeholder impacts and interests, description of potential risks, actions taken by the Company and their timing, responsible officers, and annual reports on engagement results. The Plan is drafted by stakeholder engagement functions at the level of the Head Office, the Group's branches and Russian business units.

The Company develops and upgrades stakeholder engagement tools across its operations and geographies.

From the perspective of human rights, Nornickel places strong emphasis on its relationships with employees, local communities, indigenous peoples, suppliers and contractors, as these groups are particularly exposed to the Company's impacts and exert material influence on the Company's operations (for more details on the stakeholder map, interests and engagement tools, please see [Nornickel's 2022 Sustainability Report](#)).

Employee engagement

In its interactions with employees, Nornickel seeks to respect all fundamental and labour rights, rights to safety, occupational health, freedom of association and collective bargaining, and healthy environment, as well as rights to the protection of family, maternity and childhood. To this end, the Company uses various tools for maintaining an open dialogue, and considering employee opinions and interests.

We have established social partnerships regulating labour relations as a key tool to build dialogue with our people. Moreover, the Company has in place offices for social and labour relations, a response centre and task forces at divisions (for more details, please see the [Employee Right to Freedom of Association and Collective Bargaining and Employee Right to Safety, Including Occupational Health and Safety](#) section).

Nornickel continues to promote regular practices enhancing the dialogue between the Company's senior management and employees. In 2022, we staged Nornickel Live, a Q&A session; spring corporate dialogues; awareness-raising campaigns, and other events.

The programmes enjoy unabated popularity among employees. The live stream with the Company's vice presidents and the Corporate Dialogues were attended

¹ All of the Company's by-laws on human rights are available on its official website at: <https://www.nornickel.com/investors/disclosure/corporate-documents/>

respectively by over 15,000 and around 3,000 employees who asked more than 5,000 questions.

Special attention is paid to the building of communications on the most important topics. For example, in 2022 we held eight large-scale awareness-raising campaigns, including those related to human rights (salary hikes, additional payments, increases in performance bonuses, introduction of new Cardinal Safety Rules, the Nornickel Will Help programme, pulse surveys on engagement, voluntary health insurance, Decide Together – Act Together and Let Everyone Be Heard initiatives).

The high quality of engagement in such programmes is ensured through both a multi-channel approach (use of in-house communications and mobile components) and training of multiple internal speakers. In 2022, we trained over 1,000 internal speakers to maintain a live contact and engage with employees.

Communication between managers and employees and an open information environment help build trust, alleviate stress and boost employee motivation as proved by regular employee engagement surveys, assessments of social programme efficiency, and target polls.

→ For more details, please see [Nornickel's 2022 Sustainability Report, HR Management and Social Partnership section](#).

In building the Human Rights Due Diligence System, we interact with employees at all stages of the due diligence target model by holding consultations, updating information available on the website, providing services under the Corporate Trust Line.

→ For more details, please see the [Corporate Trust Line section](#).

Interaction with local communities and indigenous peoples

ICMM PE 9.3

Nornickel maintains an active dialogue and strives to keep well-established relations with local communities and indigenous peoples. High-quality contacts enable the Company to effectively manage risks, respect rights, and unlock new opportunities for bringing sustainability principles into life.

Our relations are underpinned by strict compliance with Russian laws, regional and municipal regulations, respect for the opinion of indigenous peoples, and social responsibility.

One of the Company's priorities is to ensure the sustainable development of regions by contributing to economic, social and environmental improvements and supporting the activities of local communities.

The key tools for interacting with local communities are dedicated development institutions, including the Norilsk Development Agency, the Second School Centre for community initiatives of the Pechengsky District, and the Monchegorsk Development Agency which aim to:

- promote the development of local communities by providing educational, informational, advisory, organisational and other types of support;
- draft proposals for municipal regulations with a view to creating favourable conditions for the development of local communities;

- create infrastructure and develop business activity hubs;
- provide assistance in promoting the brands and intellectual property products of local communities.

Other interaction tools include:

- Nornickel's participation in working and expert groups, commissions, committees, and councils;
- discussion of development plans for regions of operation;
- corporate and partnership programmes and projects;
- forums, conferences, exhibitions, and round table discussions.

Nornickel regularly holds events, conducts target research, surveys, organises focus groups and open dialogues for engaging local communities into the Company's operations.

One of the most essential procedures for protecting the rights of indigenous peoples is the procurement of the Free, Prior and Informed Consent (FPIC), with Nornickel pioneering the FPIC procedure in Russia's Arctic zone in full compliance with international standards

→ For more details, please see the [Rights of Local and Indigenous Communities section](#).

As part of the efforts to build the Human Rights Due Diligence System through a comprehensive set of measures, including interviews, polls, and consultations with

local communities and indigenous peoples, we are also upgrading the grievance mechanism.

→ For more details, please see the [Grievance Mechanism section](#).

Interaction with suppliers and contractors

Not only does Nornickel protect human rights throughout its organisation, but it also engages its suppliers and contractors in this process. The Company's objective is to prevent and minimise human rights violations across the supply chain.

The human rights principles and commitments of Nornickel's counterparties are set out in the Supplier Code of Conduct¹ and Responsible Sourcing Policy².

Recognising the risks of adverse human rights impacts and conflict associated with the extraction, trade, handling and export of raw materials from conflict-affected and high-risk areas, Nornickel will neither tolerate nor in any way assist with, contribute to, facilitate the commission by any party of or profit from any forms of human rights violations or abuses in its supply chains³.

Key tools used by the Company to interact with suppliers and contractors in 2022 included:

- conferences, forums, exhibitions, in-person and online meetings;
- long-term agreements (contracts);
- supplier assessments and surveys;

- interaction through the Shipment Notice and SAP SRM portals (with over 10,000 suppliers registered in the system in 2022).

The key novelty in 2021 was the introduction of risk-based due diligence with a focus on suppliers of mineral resources

→ For more details, please see [Nornickel's Responsible Supply Chain Report for 2021-2022](#)

Security is a matter of particular concern in our dealings with suppliers and contractors. Pursuant to Nornickel's Supplier Code of Conduct, suppliers are required to guarantee that any engagement of security providers is in line with the Voluntary Principles on Security and Human Rights. The providers should stay in contact with representatives of relevant organisations to mitigate or eliminate the adverse impacts of their security arrangements at production sites. Any force deployed should be proportional to the threat.

Across its supply chain, Nornickel takes a zero-tolerance approach to any kind of modern slavery, including forced and bonded labour, human trafficking, child labour, or any form of discrimination, and ensures that its suppliers prevent any violation of human rights in their operations or supply chains⁴.



¹ MMC Norilsk Nickel's Supplier Code of Conduct is available on the Company's official website at https://www.nornickel.com/files/en/suppliers/purchasing_policy/supplier-code-of-conduct-pjsc-mmc-norilsk-nickel.pdf.
² MMC Norilsk Nickel's Responsible Sourcing Policy is available on the Company's website at https://www.nornickel.com/upload/iblock/b45/responsible_sourcing_policy.pdf.
³ MMC Norilsk Nickel's Responsible Sourcing Policy is available on the Company's website at https://www.nornickel.com/upload/iblock/b45/responsible_sourcing_policy.pdf.
⁴ MMC Norilsk Nickel's Human Rights Policy is available on the Company's website at https://www.nornickel.com/upload/iblock/df8/PJSC_MMC_Norilsk_Nickel_Human_Rights_Policy.pdf.

Grievance policy

CHRB A.1.5, CHRB C.5, IRMA 1.4.1.1, IRMA 3.1.5.1, ICMM PE 9.3

The Company provides a mechanism for all stakeholders to submit their grievances and reports on a wide range of issues, including human rights and freedoms. The grievances and reports can be submitted either anonymously or with the indication of contact details. The Company does not administrate any punishments or disciplinary actions and does not retaliate against the persons who voice their concerns.

Corporate Trust Line

CHRB C.1, ICMM PE 3.4

The principal query and claim management tool is the Company's Corporate Trust Line, which was established in 2010 to quickly respond to stakeholder concerns.

Contacts of the Corporate Trust Line

- ✉ skd@nornik.ru
- ☎ +7 (800) 700-19-41
- ☎ +7 (800) 700-19-45
- 🌐 www.nornickel.com/sustainability/corporate-hotline/

CHRB C.4

For every stakeholder wishing to make a report, toll-free channels are available 24/7: telephone, e-mail, or online form on the Company's website. The line handles reports on a wide range of matters related to violations of procedures and by-laws, including with respect to human rights, labour, production, social relations, etc.

The standard report handling procedure takes 21 working days from the registration of the report in the information system to review by a dedicated function and assessment of the response given. There

is a different procedure in place for reports that require immediate action or additional investigation. If the report is found substantiated, a set of control measures is taken, and if a violation is confirmed, steps are taken to correct the situation, eliminate any negative consequences, and inform stakeholders.

CHRB C.8

In 2022, the Company began sorting human rights reports into a separate category. In 2022, we received five reports related to human rights and freedoms, with no abuses identified as a result of the

report investigations. In addition to that, the Company reviews reports on labour and social relations, commercial and contractual activities, compliance with OHS requirements, etc.

Reports confirmed in 2022 by type of reported abuse (159 in total)



Report statistics (broken down by Group company) are submitted to the units in charge on a quarterly basis. The efficiency of the Corporate Trust Line is assessed by the Vice President for Internal Control and Risk Management, the Board's Audit Committee and employees.

In late 2022, the Company prepared a draft update of the Corporate Trust Line Procedure, which sets out a procedure for informing applicants about the registration of their complaints or queries and the outcomes of the review upon the applicant's request and where contact details are

provided, and engaging independent experts in the review process, including upon the applicant's request.

Grievance mechanism

CHRB C.2

The grievance mechanism is an additional corporate procedure geared primarily towards external stakeholders (residents in the regions of operation, suppliers and contractors, communities of indigenous peoples,

etc.). Company employees and external stakeholders can use the existing channels for grievance purposes (telephone numbers, an online form on the Company's website or an e-mail, etc.).

The mechanism does not replace any existing statutory or corporate rights protection mechanisms.

CHRB C.6

The mechanism is geared towards pre-trial dispute resolution based on dialogue and mediation. It is not mandatory and does not limit the right to statutory remedies.

Reports received in 2022 by type of reported abuse (589 in total)



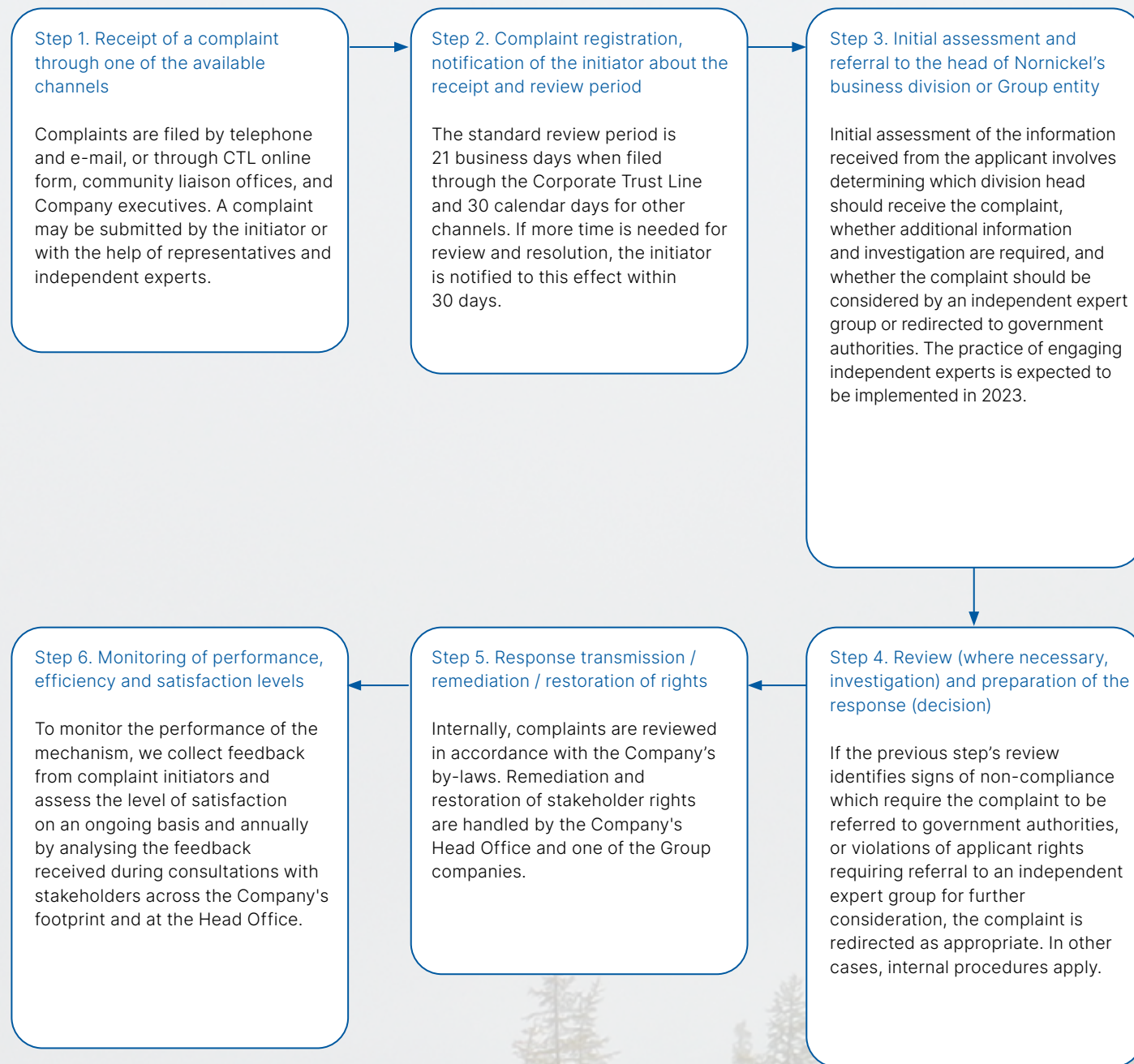
Receipt, review and management of grievances and reports on adverse impacts from the Company's operations

Objectives of the grievance mechanism

Early prevention, identification and elimination of human rights risks

CHRB C.4

The grievance mechanism includes six stages.

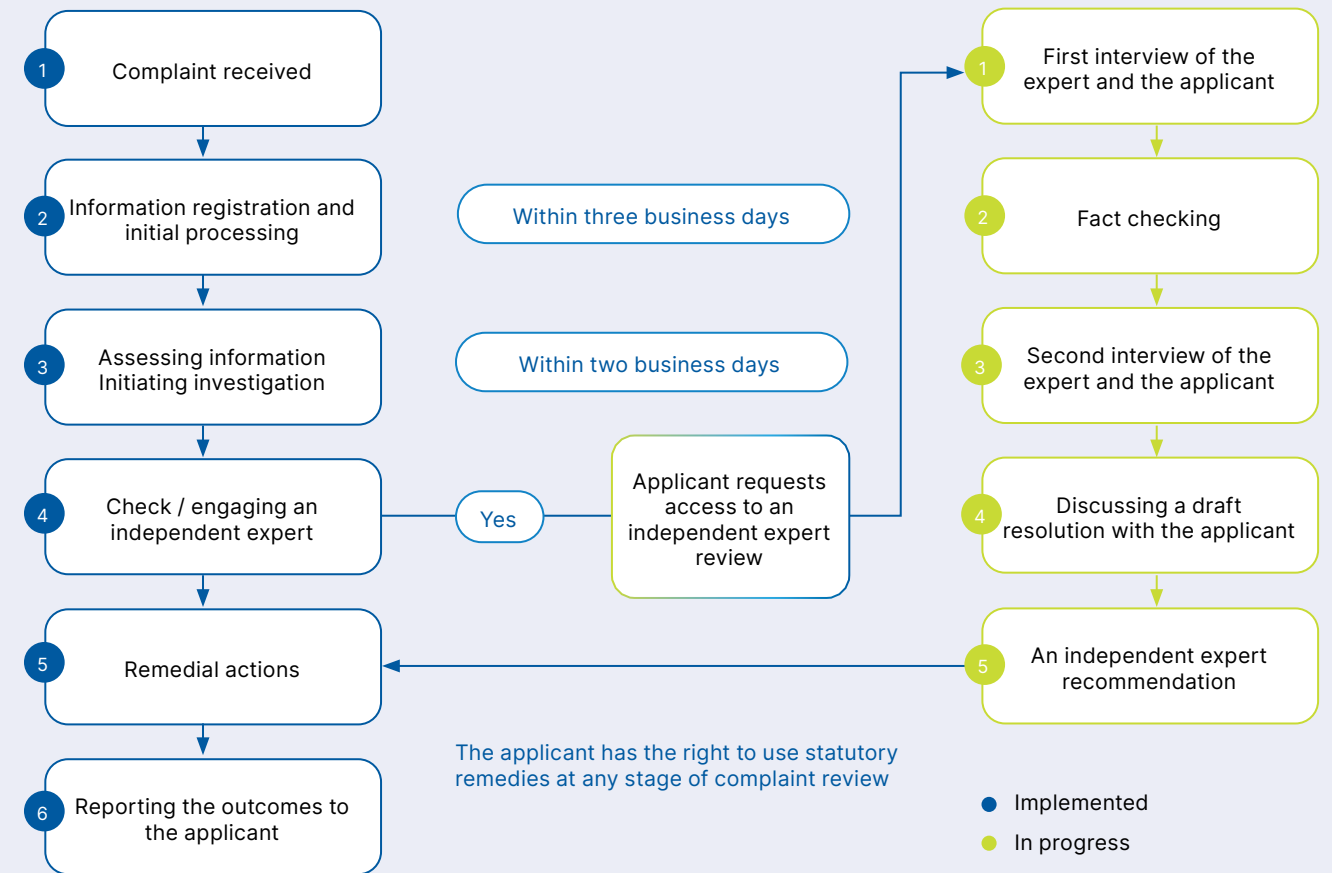


CHRB C.3

Having discussed the grievance mechanism with stakeholders, the Company plans to upgrade this mechanism and improve the efficiency

of stakeholder access to an independent expert review to obtain a full, credible, and objective third-party (independent) decision.

Target grievance mechanism model



Human rights training

CHRB B.1.5

One of the primary goals of the Human Rights Due Diligence System is to continuously communicate the importance of human rights and their implications for the business and employees, and to raise awareness about human rights in the Company. To achieve these goals, we offer our employees training in human rights.

In 2022, basic human rights training programmes for employees of the relevant units of the Company's Head Office and divisions focused on:

- relevance of human rights advocacy in the modern world;
- human rights in the mining and metals industry;
- risk assessment system, the Company's challenges and commitments in the realm of human rights;
- priority actions to embed respect for human rights into the Company's corporate culture;
- basic knowledge of and skills for human rights risk assessment, etc.

Nornickel also organised a standalone seminar for HR teams and relevant training for the Corporate Security employees

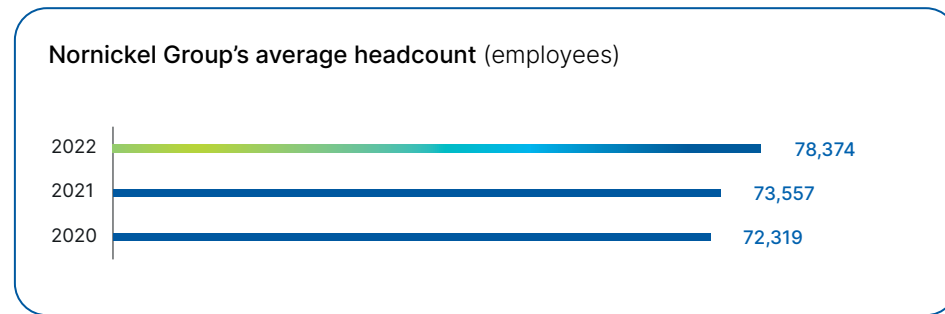
to ensure compliance with the Voluntary Principles on Security and Human Rights (VPSHR).

The Company's human rights programmes were attended by more than 150 of the Group's employees. The average duration of a training session was 1.5 hours. The Company plans to continue developing training modules and plans in the realm of human rights to enhance its employee outreach. The initiative is expected to be long-term to facilitate gradual and progressive development of corporate culture in the area of human rights and occupational safety.

Projects to support human rights principles and key 2022 highlights

Key results and indicators

Operating activities

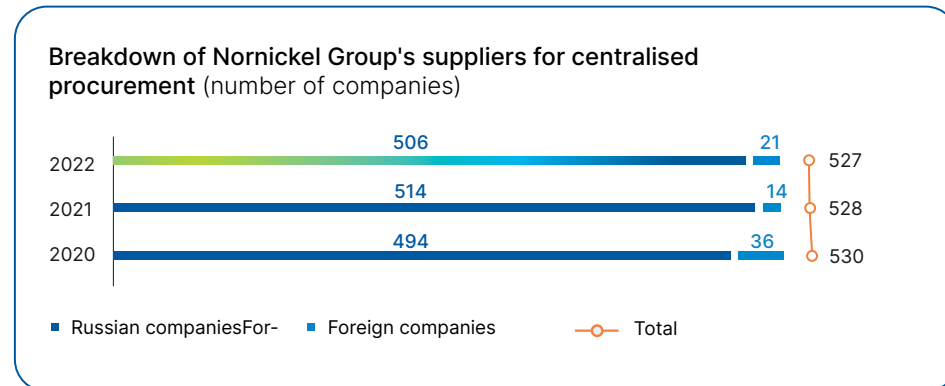


>60 thousand employees work beyond the Arctic Circle

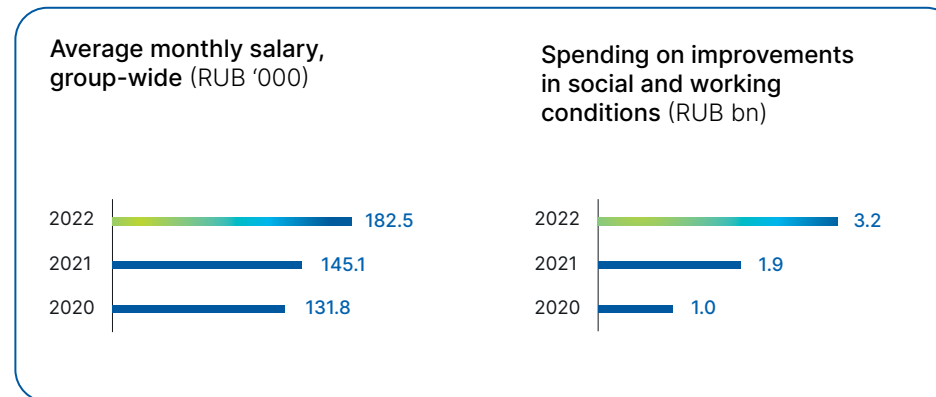
4.5 mln people residing in the regions of operation¹

5 towns and settlements where Nornickel is a mainstay of local economies

7 indigenous northern peoples (Sámi, Dolgan, Nenets, Enets, Nganasan, Evenk and Komi) reside in Nornickel's regions of operation



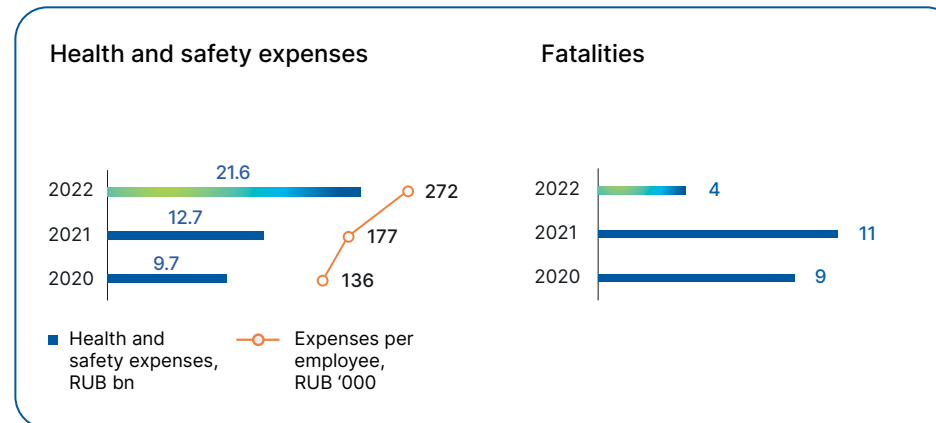
Decent working conditions



In 2022, an average monthly salary was **11,9** times higher than Russia's statutory minimum wage

Throughout its duration from 2003 to 2022, the programme to improve social and working conditions saw **13,4** bn rub in investments, with overhauls carried out

Occupational health and safety

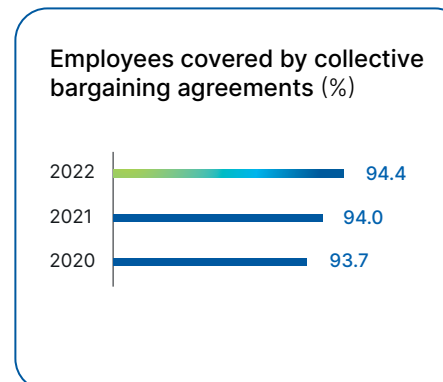


at **709** facilities

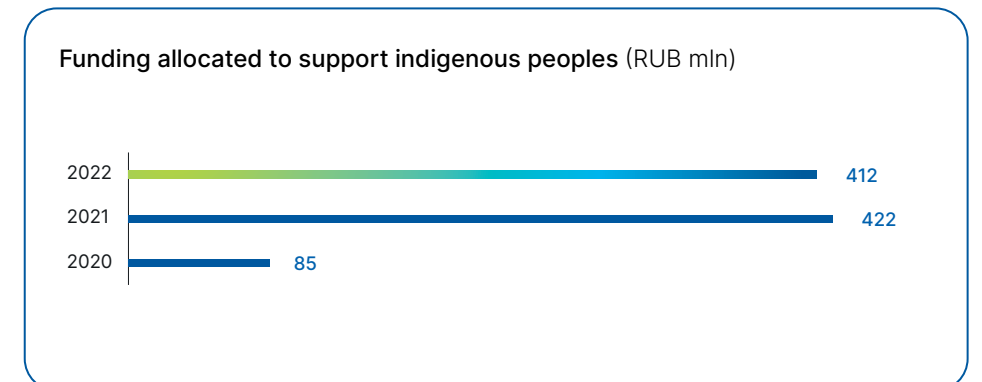
Environment

90% reduction of the Kola Division's annual SO₂ emissions as at the end of 2022 vs the 2015 base

Freedom of association



Indigenous peoples



¹ Data from the unified interagency statistical information system as at 1 January 2023 for the Murmansk Region and the Krasnoyarsk and Trans-Baikal territories is available at <https://www.fedstat.ru/indicator/61105>.

Key human rights achievements in 2021–2022

Category	2021–2022 achievements
Occupational health and safety	<ul style="list-style-type: none"> We are implementing a brand new programme to improve occupational safety and reduce accidents; we are running the Corporate Healthcare project in our regions of operation to provide a full scope of healthcare services to our employees and their families;
Healthy environment	<ul style="list-style-type: none"> The Sulphur Programme is ongoing, with Kola Division's SO2 emissions down 90% vs 2015; the programme is also at full swing at Norilsk Division; an air quality monitoring system has been launched in Norilsk to create a healthy environment for its residents;
Local communities and indigenous minorities	<ul style="list-style-type: none"> We completed Russia's first ever process of obtaining free, prior, and informed consent of northern indigenous peoples (Tukhard residents); a cooperation agreement for the social and economic development of Norilsk through 2024 and further through 2035 is in action. In 2022, we opened a new fire station, financed the overhaul of the Integrated Social Service Centre, made social payments for the purchase of housing for Norilsk and Dudinka residents relocating from Russia's Far North, and fulfilled our obligations to finance thermal stabilisation of soils under apartment buildings and social facilities; we allocated funding to help indigenous peoples (supporting trades and processing activities, enhancing housing, social and healthcare infrastructure in settlements) in the amount of RUB 412 mln in 2022;
Training	<ul style="list-style-type: none"> We organised the first comprehensive employee training course in human rights (over 150 trainees); we have put in place the Employee Training Strategy for 2022–2025 to build a training ecosystem (for more details, please see Nornickel's 2022 Sustainability Report, HR Management and Social Partnership section)
Responsible supply chain	<ul style="list-style-type: none"> The Company introduced a supply chain due diligence management system, among other things, to identify the risk of violating human rights and freedoms;
Stakeholder engagement	<ul style="list-style-type: none"> Nornickel drafts and implements annual Stakeholder Engagement Plans; reports on human rights are classified into a special category of complaints processed by the Corporate Trust Line, with improvements to the grievance mechanism ongoing;
Due diligence	<ul style="list-style-type: none"> Nornickel built a target model for the human rights due diligence and conducted a preliminary assessment of humans rights impact.

Basic employee rights

As a responsible employer, Nornickel seeks to create comfortable living conditions for its employees, which is impossible without protecting basic human rights (right to life, liberty, security of person, privacy, and freedom of movement).

Right to security of the person and privacy

We have put in place a comprehensive system to manage corporate security, including transportation, internal, facility and economic security along with procurement and counterparty selection transparency.

As a major employer, Nornickel regularly collects and stores massive volumes of personal data. In line with our Personal Data Processing Policy, we protect personal data of our employees and ensure their privacy by arranging for anti-virus protection, preventing information leaks, controlling removable media and analysing security events. The Company has established and is expanding a network of analytical situation centres.

Our Information Security Management System is subject to regular independent audits, including but not limited to the audit for compliance with personal data protection requirements. The system complies with ISO/IEC 27001:2013. In 2022, the audit at four Nornickel sites proved the high efficiency of corporate security management processes. The external auditor noted the facilities' high preparedness to new threats and challenges. The Company demonstrated risk control effectiveness and readiness for unexpected changes, confirming its ability to achieve goals related to securing production processes.

→ For more details, please see [Nornickel's 2022 Sustainability Report](#), Corporate Security section.

Occupational health

ICMM PE 5.1, IRMA 3.2.4.1, ICMM PE 5.2

The Company provide for the regular health monitoring of personnel. Employees undergo compulsory pre-employment examinations, and regular and ad hoc medical check-ups. The Company also set up medical aid posts performing pre-shift and pre-trip check-ups and providing medical assistance to employees upon request.

Those who are involved in hazardous operations are subject to additional examinations held at least once in five years by occupational pathology centres or other organisations authorised to conduct pre-employment and regular check-ups. These serve to assess occupational health fitness and determine if the disease is job-related. The Company provides such employees with personal protective equipment, wash-off and decontaminating agents, foods, milk, and other equivalent food products for therapeutic purposes in compliance with the applicable Russian laws and corporate policies.

Employees can consult geneticists as part of specialised genome sequencing tests taken by 15,000 people in 2020–2022.

In 2022, the Group's costs related to medical examinations and maintenance of medical aid posts amounted to

RUB **471** mln

and

RUB **276** mln
respectively

Making sure its employees and their families have an easy and quick access to quality healthcare is one of Nornickel's strategic goals to 2025. In the core regions of operation, we are running the Corporate Healthcare project to develop our own network of healthcare centres with the latest medical equipment and highly qualified professionals. They offer a full range of services (almost 250) rendered by medical professionals from across Russia.

In 2021, we launched the first corporate healthcare centre in Norilsk. The facility provides a variety of services focusing on Nornickel's voluntary healthcare insurance programme. It is equipped in line with European standards and has a medical information system in place.

Key centres included into the approved Corporate Healthcare programme



Central outpatient facility

- 16 December 2021
- 8/3 Sevastopolskaya Street
- 746.3 sq m
- 200 people per day
- 240 people per day (two-month advance appointment)

Talnakh	Central	Kayerkan	Dudinka
2023	2025	2023	2023
16 Kravtza Street	17 Moskovskaya Street	3A Shkolnaya Street	1 Korotkaya Street
1,863.3 sq m	4,071 sq m	504.2 sq m	400 sq m
Tender announcement	Terms of reference fine-tuned	Terms of reference fine-tuned	Tender

Address

Area

Planned number of patients served

Actual number of patients served

Project development stage

Commissioning date

In 2022, we completed the first stage of the programme to upgrade the Company's healthcare facilities and medical examination rooms for pre-trip and pre-shift check-ups, with the primary care services put in place.

- carry on with the programme to upgrade the network of healthcare facilities and medical examination rooms for pre-trip and pre-shift check-ups;
- look into the option of introducing shared medical records.

In addition to opening centres included in the approved Corporate Healthcare programme, we plan to do the following:

- develop small-scale healthcare departments in remote locations, such as Snezhnogorsk;
- create a Competence Centre for Corporate Healthcare;
- implement partnership projects to establish healthcare centres across our regions of operation to serve all local residents under the compulsory health insurance programme;

All of the Company's employees are covered by voluntary health insurance programmes. In addition, Nornickel enables its employees to insure one close relative at corporate rates. In 2022, we spent RUB 2,189 mln on VHI and personal accident insurance policies.

Our staff and their families can take advantage of discounted tours for health improvement and health resort treatment. In 2022, 25,587 people went on such tours, with the Zapolyarye Health Resort (Sochi) being the most popular destination. The

Company compensates their employees an average of about 86% of the trip voucher cost.

New staff support programme

Nornickel provides support to relocating employees, helping them settle into a new home. This includes financial aid and reimbursement of relocation expenses, baggage fees and living costs for the first three years. The Company also pays a one-time relocation allowance to help employees adapt at the new place of work.

Nornickel regularly offers its employees – many of whom work beyond the Arctic Circle – a wide range of benefits and social care support to make their living comfortable.

In 2022, the Company launched the Employee Relocation programme to ensure comprehensive assistance to employees

moving to another region, either as part of the same job or due to a change in job duties with their current employer or a different employer within the Group. The programme offers a dedicated relocation allowance.

➔ [For more details, please see the Labour Rights section.](#)

Housing programmes

We operate a combined Our Home / My Home and Your Home housing programmes to help our employees acquire ready-for-living apartments on special terms across Russia. Since the programme launch, Nornickel employees have received 5,842 apartments in Moscow and Tver regions, Krasnodar Territory and Yaroslavl. In 2022, the Company allocated RUB 1,065 mln to its housing programmes.

In addition to housing programmes, there is a Corporate Social Subsidised Loan Programme aimed at providing interest-free loans to the Company's employees to make a down payment and reimbursing a certain share of interest on their mortgage loan. Throughout its duration, 1,300 employees of the Company have benefited from subsidised loans.

Labour rights

No forced and child labour

We operate in countries with a mature legal framework. By observing applicable Russian laws, we automatically comply with most of the core ILO conventions on human rights ratified by our government. In particular, we do not tolerate any form of forced or child labour. In 2022, internal audits reported no incidents of child or forced labour. We also conduct relevant checks of suppliers.

➔ [For more details, please see the Requirements for Suppliers to Respect Human Rights as Part of Supply Chain Responsibility Commitments section.](#)

Employment, headcount by location and gender

Nornickel is among the principal employers in Russia, especially in the Norilsk Industrial District and Kola Peninsula. As a mainstay of local economies, the Company is pursuing a responsible policy which takes into account its impact on local labour markets.

In 2022, the Group's average headcount was 78,374 employees, of which 99% were employed at its Russian companies. A 6.5% y-o-y growth in the average headcount in 2022 was driven by the investment programme, organisational and technical changes (an expanded scope of works and services and the resulting personnel recruitment).

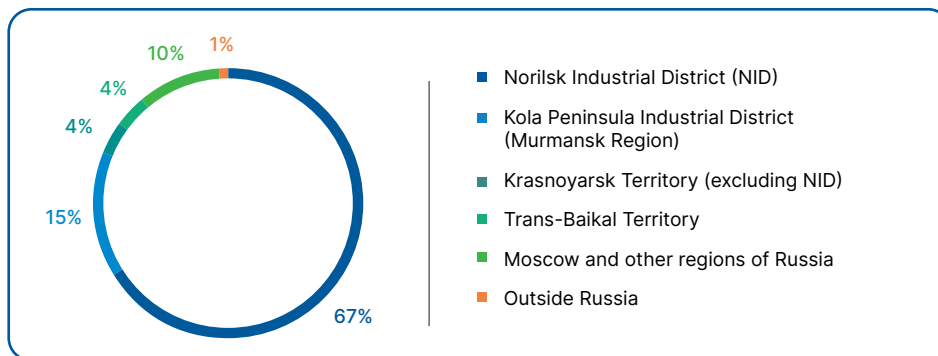


Unemployment in core regions of operation in 2022¹ (%)

Indicator	2022
Norilsk	0.2
Taymyrsky Dolgano-Nenetsky Municipal District	0.5
Krasnoyarsk Territory	0.8
Monchegorsk	1.2
Zapolyarny	0.8
Nickel	1.4
Murmansk Region	0.8

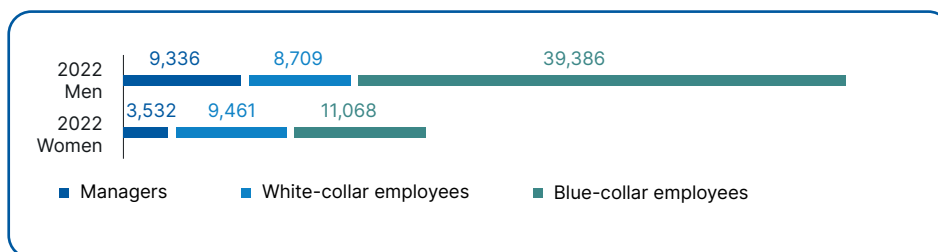
In 2022, unemployment was low across our geographical footprint – at 0.2–1.4%, which is also much lower than Russia's average unemployment rate of 3.9%².

Staff distribution in 2022



The majority of the Group's personnel is concentrated in the Norilsk Industrial District (67.0%) where most of the Group's production assets are located.

Personnel structure by gender and category in 2022, FTE³ (people)



Blue-collar employees account for the largest part of the workforce (over 60%) due to the nature of the Group's operations. Men make up more than 70% of the headcount due to the harsh working conditions in the climate of the Far North and the specifics of operations. Female workers prevail in the category of white-collar employees (more than 50%).

The proportion of women in the Management Board

40%

in managerial positions is

25%

CHRB D.3.9, IRMA 3.1.3.3, ICMM PE 3.8

In line with the Labour Code of the Russian Federation and relevant by-laws⁴, the Company prohibits any form of discrimination of women from any person, organisation or enterprise, including by applying sanctions in case of dismissal or

discrimination on the grounds of pregnancy or family status. We undertake to provide equal opportunities to men and women as required by the Russian labour laws. We are committed to ensuring respect for women rights at our sites to minimise their health risks.

Favourable working conditions

We seek to ensure the most favourable, fair and attractive working conditions for our people.

Made with Care comfort programme

Nornickel views comfortable workplace conditions and amenities as a key factor in reducing labour tensions and injuries, strengthening corporate culture and engagement, and enhancing employee health. To improve social and working conditions at production sites, we are running the Made with Care employee

comfort programme, which was updated in 2022. The programme focuses on improving working conditions and creating a comfortable environment for each employee through a consistent dialogue and care.

Benefits

Nornickel offers its employees a social security package, including various payments and benefits in excess of requirements in the Labour Code of the Russian Federation.

In 2022, we overhauled 171 social facilities, investing a total of RUB 3.2 bn.

Social expenses and benefits (RUB mln)



¹ As at the end of the reporting year.

² Source: Federal State Statistics Service (https://rosstat.gov.ru/labour_force).

³ Russian companies of the Group.

⁴ MMC Norilsk Nickel's Human Rights Policy is available on the Company's website at https://www.nornickel.com/upload/iblock/df8/PJSC_MMC_Norilsk_Nickel_Human_Rights_Policy.pdf.

On top of that, we implement social projects to support employees, strengthen their health and improve welfare. For example, we put in place the I Understand corporate welfare platform which employees can use on a voluntary and confidential basis to get online advice from psychologists, lawyers, personal finance experts and healthy lifestyle coaches in a variety of user-friendly formats.

Our top management seeks to collect employee feedback and assessment of on-site conditions. To identify areas for improvement at each site, we run an annual survey called "Let Everyone Be Heard. What Do You Think?". The survey brought about numerous positive changes in the Company's activities, including open dialogues, communication training sessions, engagement workshops and hands-on courses in corporate culture.

Fair remuneration and working hours

CHRB D.3.1, ICMM PE 3.5

Fair remuneration is an integral part of our HR policy. The average salary paid to Nornickel's employees is well above the average in the metals industry and across Russia in general¹.

Key remuneration indicators in 2022

Region	Remuneration package, RUB '000	Average monthly salary, RUB '000	Share of regional payroll in total payroll, %	Minimum monthly compensation to statutory minimum monthly wage ²	Statutory minimum wage ³ , RUB
Group average	194.7	182.5	100.0	-	-
Norilsk Industrial District (NID)	198.7	185.6	67.9	1.0	39,725
Kola Peninsula Industrial District (Murmansk Region)	139.7	128.3	10.9	1.0	35,142
Krasnoyarsk Territory (excluding NID)	103.5	98.5	2.6	1.0	24,446
Trans-Baikal Territory ⁴	179.6	170.4	3.4	1.62	22,919
Moscow and other regions	310.7	298.8	15.2	2.47	23,508

Working hours across all Nornickel's operations are in compliance with applicable Russian laws and international regulations, which is reflected in the Labour Conditions

Policy. Nornickel keeps track of actual working hours of each employee to ensure compliance with the Russian laws.

Equal rights and opportunities

ICMM PE 3.9

The UN Universal Declaration of Human Rights states that all human beings are born free and equal in their dignity and rights and everyone is entitled to all the rights and freedoms set forth in the Declaration, without distinction of any kind.

The Company does not tolerate any forms of discrimination leading to the breach of rights and interests of individuals or social groups based on their nationality, race, sex, religion, or other distinction.

Providing equal opportunities to all employee categories, non-discrimination and nurturing an environment propitious for professional development are Nornickel's priorities. To pursue these goals and fulfil our obligations, we combat discrimination in any form and offer educational and career building programmes.

Our ethical principles¹:

- building respect both inside and outside Nornickel;
- mutual respect at the workplace and teamwork;
- promoting equal opportunities;
- creating a friendly and stable working environment for our employees;
- fair performance evaluation, employment and promotion solely on the basis of professional abilities, knowledge, and skills.

Equal Opportunities Programme

The Equal Opportunities Programme has been running for over five years. It brings together a number of initiatives to offer equal work and employment conditions for all groups of its current and potential employees.

Support programmes for vulnerable population groups

To support selected population groups, the Company gives them hiring preference for vacancies, including:

- individuals with disability caused by an occupational incident or occupational disease during their employment with the Company;
- former employees of the Company who were made redundant;
- family members of employees who died as a result of a fatality or lost their professional capacity as a result of an occupational incident or disease during their employment with the Company; spouses, adult children and parents of such employees are entitled to a job in the Company within one month from the date of a job application, subject to the availability of a suitable position;
- graduates of secondary and vocational schools located in the regions where the Company operates, within the first year after graduation.

Employment programme for people with disabilities

The Company has created workplaces tailored for people with disabilities. According to the employment quotas that vary depending on the region and company size, the share of such employees starts from 2% of the average headcount, excluding employees involved in harsh, hazardous and/or dangerous work.

We provide necessary working conditions, including work and rest schedule, annual and additional paid leaves, and additional financial assistance for this category of employees.

Employee relocation

The Company launched the Employee Relocation programme on 1 January 2022. In addition to reimbursing travel expenses, baggage fees, living costs, and providing a one-time relocation allowance and additional leave for an employee to settle in, the programme provides for a relocation benefit (up to 40% of salary).

Career Start-Up programme

Launched in 2014, the Career Start-Up programme offers university students a unique opportunity to combine classroom knowledge with hands-on professional experience in real production conditions, evaluate their strengths and discover their future profession. The programme that targets final year students learning professions relevant for Nornickel provides for extended field and pre-graduation internships. As part of the programme, the Company and a student sign a fixed-term employment contract. In case of successful completion, students secure employment with the Group companies. In 2022, the programme welcomed 390 students from across Russia, and 57 Norilsk residents.

Every year, Polar Division stages the Conquerors of the North business game for students as part of the Career Start-Up programme. The game seeks to equip students with additional tools to develop competencies and skills needed to advance a career and build a project mindset and teamwork abilities.

¹ Source: Federal State Statistics Service, <https://eng.rosstat.gov.ru/labour>
² Minimum wages paid by the Company are gender neutral.
³ In line with Resolution No. 973 of the Russian Government dated 28 May 2022.
⁴ Calculated based on Bystrinsky GOK.

¹ MMC Norilsk Nickel's Business Ethics Code is available on the Company's official website at https://www.nornickel.com/upload/iblock/621/business_ethics_code.pdf.



The new programme offers a fresh perspective on our youth policy. Time has come to expand its scope, on the one hand, and merge some domains, on the other hand, thus creating the best environment for young employees to build ties through shared interests, develop professional competencies and creativity, and unlock their potential. That said, we certainly took into account the Company's strategic goals and current business requirement when designing the programme.

Irina Zhuykova,
Head of the Social Policy Department at Nornickel

New staff support programme

Many Nornickel employees come to Norilsk and the Taimyrsky Dolgano-Nenetsky Municipal District from other regions. As part of its support, the Company allocates financial aid and holds onboarding and team-building events for newly employed staff, including young specialists, workers, engineering staff, and managers relocating to the Company's regions of operation.

With 1,470 employees joining the relocation support programme in 2022, it now has a total of 3,224 participants. In 2022, Nornickel spent RUB 978 mln on relocation support to new hires.

In Good Company corporate youth programme

In 2022, we kicked off a new In Good Company programme for young employees aged under 35. The programme seeks to create a community of like-minded people where they can share interests and goals and support each other in pursuing them along four different tracks – Professional Practice, Social Practice, Growth and Creativity.

As part of the programme, the Company developed an online app – a social network in which users are free to choose any number of tracks and activities and interact with each other regardless of position, profession or location.

In 2023, the programme will cover students and young professionals taking internship in the Company.

➔ For more details on the programme, please see [Nornickel's 2022 Sustainability Report, Social Policy section](#).

Flexible recruitment practices

We are actively introducing remote working practices, local employment offices, and a shift-camp work arrangement offering comfortable camps, good infrastructure and nutrition. Other initiatives include cooperation with universities to attract talent to the Company.

We also seek to improve digital literacy of our people. For example, we developed the Digital Nornickel online platform and mobile app enabling our staff to take short educational courses in technology used by Nornickel.

Training and education

At Nornickel, training and development is a continuous process involving all employee categories. We provide extensive professional training and personal growth opportunities to our staff. We run mandatory and open educational programmes covering all units.

One of our priorities in 2022 is to build an accelerated training and development ecosystem for people who can contribute towards the Company's goals. The ecosystem became the centrepiece of Nornickel's Training Strategy for 2022–2025.

In 2022, we held 216,000 training man-sessions, up 87.8% y-o-y. The average number of training hours per employee (based on average headcount) is 85, per male employee – 95, per female employee – 62. Since 2020, the number of the Company's employees who completed training programmes has been steadily growing, which led to the rise in expenses on educational initiatives. The growth was mainly driven by online training which attracted more students thanks to increasing popularity and development of Nornickel Academy, lifting of COVID-19 restrictions, and return of a portion of employees to in-person learning.

➔ For more details, please see [Nornickel's 2022 Sustainability Report, HR Management and Social Partnership section](#).

Support to former employees

Ongoing assistance to former employees is part of the Company's corporate social policy. To support employees after they retire, Nornickel has put in place the Co-Funded Pension Plan, a corporate private pension programme. The programme envisages two pension plans – Parity and Corporate, which have different financing schemes depending on an employee category.

As at the end of 2022, it covered 10,406 employees across 23 Group companies, with 4,466 retirees already receiving pensions.

Nornickel's Veterans programme has been designed to support unemployed pensioners who permanently reside in Norilsk. The main eligibility criterion is the employee's length of service at the Company.

On top of that, the Pensioner Financial Aid Fund grants financial aid to former employees who retired prior to 10 July 2001 provided they had been employed by the Company's units for more than 25 years and permanently reside outside of the Norilsk Industrial District.

The Company additionally provides targeted assistance to its former employees and their families to pay for health improvement, medications and funeral services, and help those experiencing hardships.

Social benefits in case of production shutdown

To improve the environment across its regions of operation, Nornickel shuts down its facilities, for example, smelting and metallurgical operations in Nickel in 2020 and in Monchegorsk in 2021.

The social support programme for employees facing redundancies was developed following the decision to shut down the smelting facility in Nickel in 2019. The programme includes comfortable relocation to other sites, retraining, and pension plans. Later, it was extended to employees of the metallurgical shop in Monchegorsk.

In 2019–2022, a total of 995 people were enrolled in the programme, of which 63% signed employment contracts with Group companies and had the same level of pay during the first year, 37% decided to leave the Company or were dismissed with additional payments, and 353 attended training, re-training and upskilling programmes.

In 2020–2022, the Company invested RUB 1,636 mln in social programmes for employees facing redundancies.



Employee right to safety, including occupational health and safety

CHRB D.3.4, CHRB D.3.7, IRMA 3.2.4.1, ICMM PE 5.1, ICMM PE 5.2

The Company's senior executives view a healthy and safe working environment as a strategic priority; with that in mind, we carry on with programmes to prevent workplace accidents, mitigate occupational diseases, and develop a stronger safety culture.

To promote safety culture, the Company's management encourages its employees to get involved in operational health and safety management. Most of the Group's divisions and assets have joint health and safety committees (councils) made up of the management, employee and trade union representatives. In 2022, 712 representatives took part in over 11,500 audits and submitted almost 2,600 health and safety improvement proposals.

In 2022, Nornickel's sites completed external audits to confirm compliance of occupational health and safety management systems at the key assets with ISO 45001:2018 (Occupational Health and Safety Management System). The independent external auditor described the OHS management system as mature and well-established.

In view of hazardous factors identified at Nornickel's production facilities, the Company furnishes employees with personal protective equipment (PPE), including respiratory protection (respirators, gas masks), hearing protection (earmuffs, earplugs), eye protection (glasses/goggles with UV filters, visors), and skin protection items. The total cost of personal protective equipment in 2022 exceeded RUB 4.6 bn.

In 2022, we revised our Cardinal Safety Rules and OHS incentive programme and carried out awareness-raising activities for employees. From 2023, employees will be paid incentive compensation for identifying risks at their workplaces: RUB 5,000 for identifying a risk and reporting it to their line manager, RUB 7,500 for developing a proposal on risk minimisation, and RUB 10,000 for taking part in the proposal implementation. The risk-oriented approach was implemented in 2022 for pilot projects at Medvezhy Ruchey's Norilsk Concentrator: 462 risks were identified, of which 222 risks were detected by the blue-collar employees, and 101 risks were eliminated.

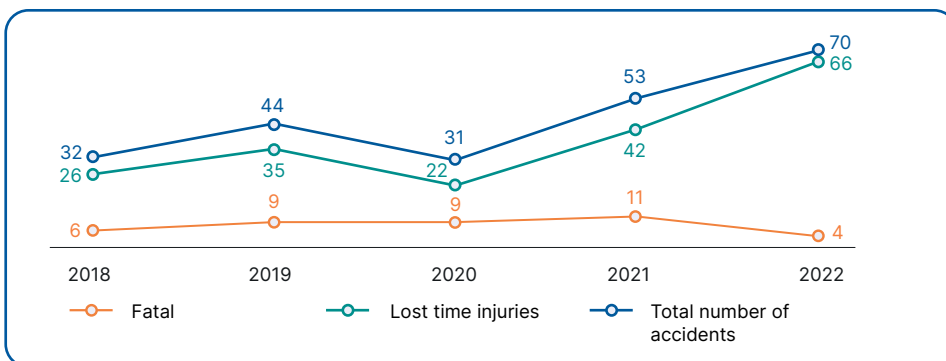
Improving the OHS mechanism does not only affect the Company's internal procedures. 2022 saw the revision of the standard regulating occupational health

and safety at all stages of working with contractors. As a result, the Company was able to improve the level of control and occupational safety for contractors operating at Nornickel's facilities. In 2022, the Company revised the general terms regarding health and safety that are included in agreements with contractors. The amendments focused on avoiding fatalities and non-compliance with the Cardinal Safety Rules, and encouraged contractors to be proactive on health and safety.

To improve occupational safety, we conduct briefings and implement OHS upskilling initiatives. In 2022, Nornickel launched a project to create a workplace safety culture coaching system at 18 of the Group's companies. At the end of the reporting period: 5,030 workers completed the Dynamic Risk Assessment programme, which was held 717 times, and 238 employees completed the Behaviour-Based Safety Audit programme, which was held 33 times.

The above measures foster employee motivation for safe workplace behaviour, accident prevention and mitigation of occupational health and safety risks.

Work-related accidents



Indicator	2020	2021	2022
Health and safety expenses, RUB bn	9.7	12.7	21.6
Health and safety expenses per employee, RUB '000	136	177	272
LTIFR	0.2	0.38	0.57
FIFR	0.08	0.1	0.034

For Nornickel's management, zero workplace fatalities is a key strategic priority¹. The Company keeps running dedicated programmes to prevent

workplace accidents and expects its suppliers to implement safety procedures and monitoring tools to achieve zero fatalities at work².

The increase in lost time injury frequency rate (LTIFR) from 2020 to 2022 is associated with a new approach to recording, classifying and investigating accidents, which helped improve the transparency and reliability of information provided.



Employee right to freedom of association and collective bargaining

CHRB D.3.3, IRMA 3.1.2.1, ICMM PE 3.4

At Nornickel, employees' right to freedom of association and collective bargaining is governed by MMC Norilsk Nickel's Freedom of Association Policy³. The Policy sets out the following principles:

- the Company recognises the right of its employees to establish, join, participate in and withdraw from trade unions in order to protect their interests and bargain collectively;
- the Company accedes to the exercise of employees' right to collective bargaining;
- the Company maintains neutrality towards all professional associations and other employee representations;

- the Company is committed to protecting its employees against any restriction of their freedom of choice, such as discrimination on the basis of race, skin colour, gender, ethnicity, language, religion, disability, political preference or any other feature.

Social partnership framework

The Company has a system of social partnership at its sites to align the interests of employees and employers in terms of the regulation of social and labour relations.

In 2019, Nornickel joined an interregional cross-industry agreement for copper and nickel producers and their supporting industries until 2025 (updated and extended in 2021).

As of the end of 2022, the agreement applied to 21 Group companies, including MMC Norilsk Nickel, covering 89.7% of the Group's employees.



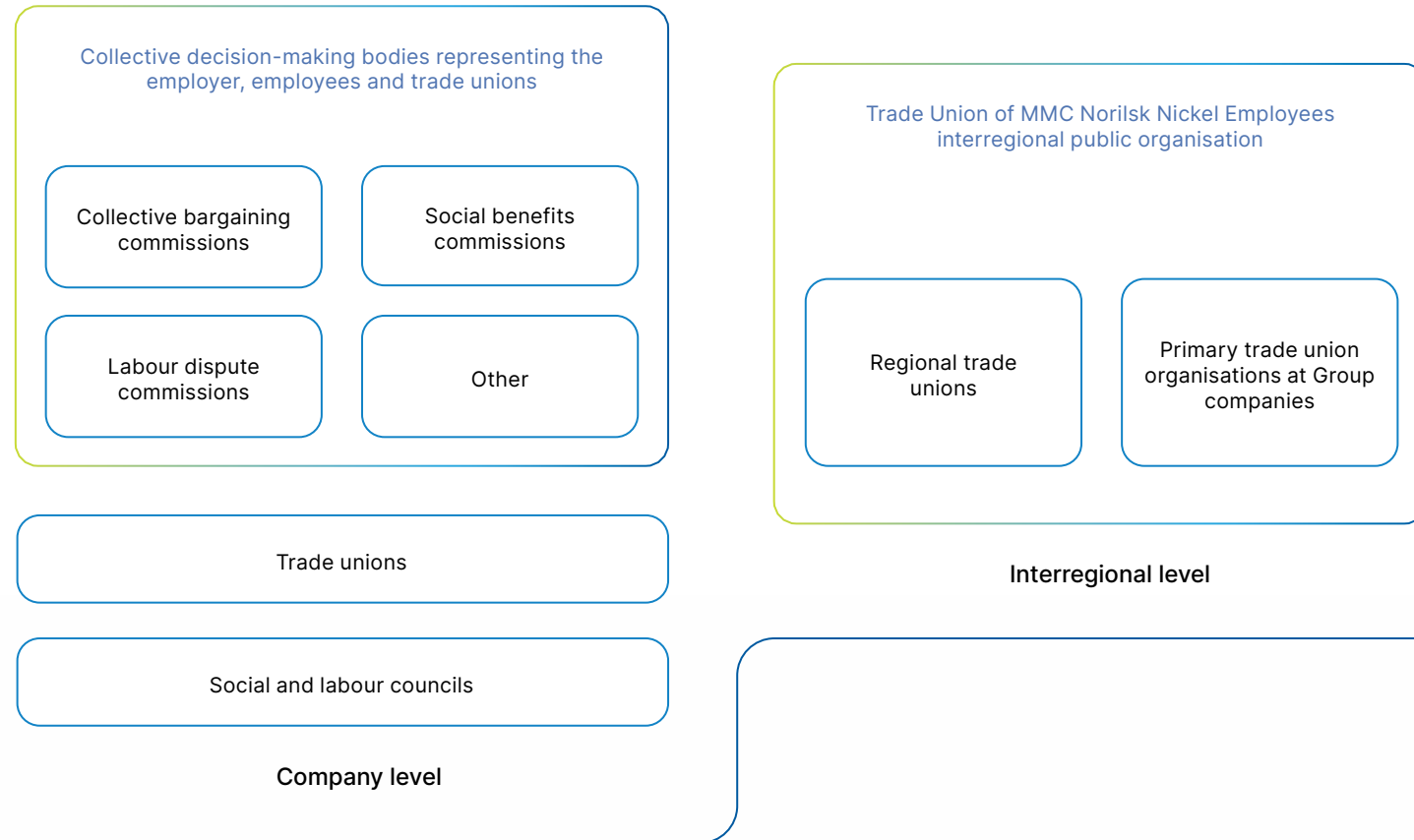
¹ This goal was made part of the updated Occupational Health and Safety Strategy for 2023–2025.

² MMC Norilsk Nickel's Supplier Code of Conduct is available on the Company's official website at https://www.nornickel.com/files/en/suppliers/purchasing_policy/supplier-code-of-conduct-pjsc-norilsk-nickel.pdf.

³ MMC Norilsk Nickel's Freedom of Association Policy is available on the Company's official website at

⁴ https://www.nornickel.com/upload/iblock/183/da6375mm02jan5ym16s3z4squqfzj0dr/pjsc_mmc_norilsk_nickel_freedom_of_association_policy.pdf.

Tools for considering employee interests



The Group companies are parties to

23 collective bargaining agreements

covering

94.4% of the Group's headcount.

As at the end of 2022

7.4% of all the Group's employees were members of trade unions

77% were represented by social and labour councils.

Employee right to the protection of family, maternity and childhood

We are committed to taking care not only of our employees, but also of their families.

Maternity protection

The Company retains salaries of employees on maternity leave and provides them with financial aid.

The Company provides financial assistance to employees giving birth to /adopting a child, to those raising disabled children under the age of 18, and employees or their family members suffering from a serious illness. In addition, the Company implements social programmes to support families, including family recreation and leisure, medical care, etc.

Employees on maternity and/or childcare leave and those back from leave (people)

Indicator	2020	2021	2022
Employees on maternity and/or childcare leave	1,617	1,528	1,526
Employees back from maternity and/or childcare leave over the year	653	771	592

Family recreation and rehabilitation programmes

Nornickel implements health improvement programmes for employees and their families, including recreation for children. In 2022, children of the Company's employees spent their summer holidays at a health resort and recreation camp on the Black Sea. Due to the temporary closure of Anapa Airport, the resort could only be reached by train. Thanks to the camp shift organisers, everything went smoothly, with children first arriving in Adler by regular

and charter flights. To further transport the children to Anapa, Nornickel together with its partners arranged a special train made up of 14 carriages. Nornickel was the first and only company to offer such a multimodal transportation experience.

The Company's social package includes discounted tours for health resort treatment and recreation of employees and their families, as well as reimbursement of round trip travel expenses and baggage fees (for the respective data, please see the [Labour Rights](#) section).



Rights of employees and external stakeholders to a healthy environment

Nornickel respects the right of all people to a healthy environment and strives to reduce its environmental footprint in the regions across its footprint, as well as to introduce environmental initiatives.

The Sulphur Programme yielded the most impressive results in the reduction of air emissions. Nornickel's goal is to deliver an industry-leading performance in cutting emissions.

Since 2016, the Sulphur Programme has resulted in the closure of three major outdated metallurgical facilities:

- 2016 – Nickel Plant in Norilsk;
- 2020 – Smelting Shop in Nickel;
- 2021 – Kola MMC's metallurgical shop in Monchegorsk.

The full shutdown of the obsolete copper line at the refining shop on the Kola Peninsula led to the complete elimination of transboundary

emissions. Between 2015 and 2021, Nornickel achieved a 90% reduction in sulphur dioxide emissions in Kola Division, which is above the target of 85%.

Following the closure of Nickel Plant in 2016, SO₂ emissions in Norilsk went down by 30%, while the number of newly detected cases of diseases demonstrated a drastic reduction.

Progress against Sulphur Programme in Norilsk:

- active implementation of Phase 1, launch of Sulphur Programme 2.0 at Nadezhda Metallurgical Plant: in 2022, we continued to build off-gas recycling facilities, sulphuric acid neutralisation line and related infrastructure, and carry out construction, installation and pre-commissioning works. Target - a 45% decline in total SO₂ emissions at Norilsk Division's facilities by 2023 (vs 2015);
- preparatory work is being carried out under Phase 2, launch of Sulphur Programme 2.0 at Copper Plant to capture furnace and converter gases. In 2022, the Company reviewed some of its design solutions taking into account import substitution of technologies and equipment. Target - a 90% reduction in total SO₂ emissions at Norilsk Division's facilities by 2030 (vs 2015).

In 2021, the Company rolled out an advanced air quality monitoring and forecasting system in Norilsk and Monchegorsk to inform residents about air quality in each district and in the city in general, as well as for plant dispatchers to promptly decide on changing the production process to prevent or minimise emissions. Readings will be transmitted online; dispersion visualisation is based on a mathematical model with a 24-hour forecast. In 2022, the Company completed the first stage of implementing the air quality monitoring and forecasting system in Norilsk and Monchegorsk.

Rights of local and indigenous communities

Rights of indigenous peoples

CHRB D.3.5, ICMM PE 3.6

Nornickel started operating in 1935 in the town of Norilsk. Today, the Company's key operations are concentrated within the perimeter of the existing assets, and, in some cases, they have an impact on the lives of indigenous peoples. Nornickel respects the rights, lands, economic

activities, traditional culture, historical heritage and interests of indigenous peoples, and directs its efforts towards strengthening and developing neighbourly relations.

Nornickel runs a due diligence system designed to assess the impacts of the Company's new industrial projects and

sustainability initiatives on the rights and lifestyles of indigenous peoples. In addition to that, there are dedicated independent procedures to review the grievances of indigenous communities on FPIC arrangements and preparations for the development of the Kolmozerskoye deposit (Murmansk Region) without the Company's interference.

Free, Prior and Informed Consent

CHRB A.1.3.a, IRMA 2.2.2.2, ICMM PE 3.2, ICMM PE 3.7

Free, Prior and Informed Consent (FPIC) is a right enshrined in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and Convention No. 169 of the International Labour Organisation (ILO) whereby indigenous communities can give or withdraw their consent to projects which can affect the interests, habitats and cultural heritage of such communities. FPIC enables indigenous peoples to have a say in decisions on project development, implementation, monitoring and assessment parameters.

Nornickel was the first company to launch the Free, Prior and Informed Consent process in the Russian Arctic with respect to the relocation of Tukhard residents from a sanitary protection zone¹ and further development of the respective area. The sanitary and living conditions of this community did not meet the requirements of applicable Russian laws. Hence, the Company proposed building a new settlement so that the local residents could relocate there. Tukhard residents agreed to join the FPIC procedure subject to certain conditions, including the decision whether they will relocate or not, choosing the site for their new settlement and determining

its social infrastructure, selecting the best architectural designs as part of an architectural competition, as well as participation in all stages of the relocation programme through the elected Council of Representatives of the settlement residents.

The FPIC procedure was carried out in full respect for the culture and customary decision-making processes of the Nenets people, indigenous minorities residing in Tukhard. The Company does not only seek to offer local residents safer and more comfortable living conditions, but also to contribute to the preservation of the traditional lifestyle and ethnic identity of indigenous communities.

Going forward, Nornickel intends to maintain an ongoing dialogue and look for compromises with the Sámi people, an indigenous minority occupying an area where the Company and its partners plan to develop a lithium deposit (Kolmozerskoye deposit, Lovozero District, Murmansk Region). Considering that the interests of indigenous people may be affected, the Company might use lessons learned from the relocation of Tukhard's residents to apply the FPIC procedure once again in 2023.



¹ In line with the existing legislation, people may not reside within the boundaries of sanitary protection zones and therefore cannot apply for permanent registration there.

To ensure effective engagement with indigenous peoples, Nornickel's Polar Division established the Coordinating Council of MMC Norilsk Nickel for Interacting with Family (Tribal) Communities of Indigenous Northern Minorities. Today, the Council brings together 53 tribal communities.

In 2021–2022, the World of Taimyr grant competition helped implement numerous projects for the preservation of long-standing traditions and for the development of territories where the Taimyr Peninsula indigenous minorities traditionally reside.

In 2020, we signed a Cooperation Agreement with the associations of indigenous peoples of the Russian Federation, Krasnoyarsk Territory, and Taimyrsky Dolgano-Nenetsky Municipal District.

Nornickel and the Peninsula's indigenous communities are running joint programmes to support traditional trades, healthcare, housing arrangements, education, culture, sports and tourism, with total financing coming in at more than RUB 2 bn.

➔ For more details on the Company's interaction with indigenous communities, please see [Nornickel's 2022 Sustainability Report](#), Development of Local Communities section.

Improving the living standards for local communities

ICMM PE 9.1

The Company pays close attention to the development of infrastructure in the regions where it operates, including by implementing the following projects:

- renovation of Norilsk's housing, upgrade of the utilities network, urban improvements, and development of social infrastructure;
- healthcare, culture, education, and sports projects, and initiatives to improve the urban environment in Monchegorsk, Zapolyarny and Nickel;
- culture, education and utilities projects in the Gazimuro-Zavodsky District, cultural and sports events, promotion of children's and youth sports and other initiatives in the Trans-Baikal Territory;
- construction of a fibre optic communication line in Norilsk to provide local residents with a stable internet connection;
- implementation of the Corporate Healthcare project (for more details, please see the [Basic Employee Rights](#) section).

In 2022, Nornickel's key programmes and initiatives aimed at improving the well-being of local communities included:

- World of New Opportunities, a charitable programme designed to support and promote public initiatives, develop social partnerships, introduce new social technologies and foster soft skills among local communities (in 2022, the World of New Opportunities programme counted around 40,000 participants from the Company's regions of operation);
- Plant of Goodness, a corporate volunteering programme bringing together the Company's expertise and its vast track record of social and environmental initiatives (in 2022, over 3,500 corporate volunteers were involved in more than 370 initiatives implemented as part of local community projects);
- programmes to support sports and fitness (in 2022, the sporting and fitness events drew a total of 24,000 employees, while corporate competition streams garnered over 60,000 views).

➔ For more details on the Company's projects in the regions of operation, please see [Nornickel's 2022 Sustainability Report](#), Development of Local Communities section.

Key dimensions of the World of New Opportunities programme in 2022

Dimension	Purpose	Programmes and projects
DEVELOP!	Support of public initiatives and development of local territories through building partnerships	<ul style="list-style-type: none"> • We Are the City! social technologies forum; • Socially Responsible Initiatives competition; • World of Taimyr project competition; • travel grant competition; • We Are the City! social engineering workshop; • We Are the City! picnic; • implementation of the Mobile E-education digital learning platform in the Murmansk Region; • School Break educational project.
INVENT!	Fostering of R&D creativity and the spirit of invention	<ul style="list-style-type: none"> • IMAKE engineering marathon; • IN'HUB international forum of innovators; • Arctic Wave festival of R&D discoveries.
ACT!	Development and growth of service-based economy	<ul style="list-style-type: none"> • Accelerator for regional entrepreneurs and investment session.
CREATE!	Advanced development of regions	<p>Projects of regional development institutions:</p> <ul style="list-style-type: none"> • Norilsk Development Agency; • Second School Centre for Community Initiatives of the Pechengsky District; • Monchegorsk Development Agency.



Ethnic groups of indigenous peoples in the regions of the Company's operation

Sámi

The Sámi, also called Lapp (a group of Finno-Ugric peoples), come from the ancient inhabitants of Europe. The Sámi are first mentioned at the end of the 8th millennium BC, when people from the North first settled on the coast of Fennoscandia.

What is special about the Sámi as an ethnic group is the fact that the traditional habitat of the Sámi population is currently part of several sovereign states, i.e. Norway (40,000 to 60,000 people), Sweden (17,000 to 20,000 people), Finland (6,000 to

8,000 people) and Russia (1,500 people). Currently, the majority of the Russian Sámi live in the Lovozero District, Murmansk Region.

The Sámi of the Kola Peninsula are a standalone ethnographic group called the Kola Sámi (or the Lapp). They belong to the economic and cultural type known for a combination of reindeer herding, fishing, hunting and a semi-nomad life turning into a sedentary one in the recent decades.

In Ancient Rus, the Sámi worshipped natural phenomena, trees and mountains, and they were thought to be noaidis (shamans) and soothsayers. Sámi fishermen still toss coins into rivers so that water spirits would grant them a rich haul of fish.

The principal social and economic unit of the Sámi is the siida, a local community.

Dolgans

The Dolgans are an indigenous people of the north of the Krasnoyarsk Territory. The majority of them live along the banks of the Kheta and Khatanga rivers of the Taimyrsky Dolgano-Nenetsky Municipal District. The Dolgans are considered to be the northernmost Turkic-speaking ethnic group. Their number is 8,200 people.

The Dolgan ethnic group was formed in the 19th – early 20th century embracing Evenks and Yakuts who moved there in the 18th century, and also local Evenks, some families of Enets and Zatundra peasants.

The traditional Dolgan livelihoods include nomad reindeer herding, hunting wild reindeer, fur trapping and fishing. In summer, the Dolgans can be found in the tundra with their reindeer herds, and in winter they move to the tundra forest belt. In present-day conditions, the Dolgan reindeer herding is developing as a collective production industry, and also as part of tribal and family enterprises. After a lot of the Dolgans turned to a sedentary life in the second half of the 20th century, their standalone families have been living in settlements made up of tract houses.

The Dolgans are good at arts and crafts, they make beads jewellery and decorate clothes and footwear with reindeer fur and beads. Reindeer and mammoth bone carving is quite popular among them.

The Dolgans belong to Tengrism, Shamanism and Russian Orthodox faiths.

Currently, the Dolgans are among the most urbanised peoples of Taimyr.

Nenets

The Nenets are a Samoyedic people of Russia living on the Eurasian coast of the Arctic Ocean from the Kola Peninsula to Taimyr. The daily life of the Nenets has remained unchanged for 8,000 years.

The Nenets consist of two ethnic subgroups, the European and the Asian (Siberian) Nenets. The European Nenets reside in the Nenets Autonomous Area of the Arkhangelsk Region, and the Siberian Nenets can be found in the Yamal-Nenets Autonomous Area and in the Taimyrsky Dolgano-Nenetsky Municipal District, Krasnoyarsk Territory. Smaller groups of the Nenets live in the

Khanty-Mansi Autonomous Area, Murmansk and Arkhangelsk regions, and also in the Republic of Komi.

The Nenets are also divided into the tundra and the forest ones, which speak different languages.

From among the indigenous peoples of the Russian North, the Nenets are the most numerous one, with their number reaching 49,600 people.

The traditional Nenets livelihood is reindeer herding in large herds. On the Yamal Peninsula, there are several thousand nomad Nenets herding about 500,000 reindeer.

The traditional Nenets housing is a conical yurt (mya). One mya is made of 40 poles covered with reindeer hides. Inside the yurt, each item and each place have their purpose assigned to them in the ancient times.

The Nenets faith is Shamanism. They believe that trees, mountains, lakes and rivers are inhabited by spirits.

Enets

The Enets are a Samoyedic indigenous people living in Russia. They are first mentioned back in the 15th century. The ethnogenesis of the Enets embraces both local tribes of Northern Siberia and the Samoyeds coming from the mid-Yenisey territory and from the Tom River basin and assimilating the local population.

The number of the Enets in Russia is 201 people. They mainly live in the Taimyrsky Dolgano-Nenetsky District. Despite the small number, the Enets are divided into two ethnic groups, the tundra and the forest ones, based on their settlement area, language and culture.

As regards the language and culture, the Enets are close to the Nganasans and the Nenets.

The Enets' principal dwelling is a conical yurt similar to that of the Nenets but smaller in terms of the covering.

The basic Enets' livelihoods are sedentary reindeer herding, hunting wild reindeer, fur trapping and fishing.

Currently, most of the young Enets people work in institutions of Taimyr settlements, and a minor part are engaged in traditional hunting and reindeer herding. Among the today's tundra inhabitants, Enets-Nenets families account for about 50%; as for the forest Enets, they have more than 70% mixed families.



Nganasans

The Nganasans are a Samoyedic indigenous people living in Siberia. They are the northernmost in the entire Eurasia, and one of the oldest indigenous people in the Arctic. They come from the most ancient population of Taimyr, Neolithic hunters.

Currently, the Nganasans inhabit the east of the Taimyrsky Municipal District, Krasnoyarsk Territory, and a territory managed by the municipal authorities of Dudinka. The Nganasans are divided into the western ones, the Avam Nganasans, with the centres in the settlements of Ust-Avam and Volochanka of Dudinka, and the eastern ones, the Vadeyev Nganasans, with the centre in the Novaya settlement of Khatanga. They differ in their family and tribe compositions and dialect features of the language. The number of the Nganasans registered in Russia is 687.

By now, most of the Nganasans have turned to non-traditional activities in stationary settlements. Reindeer hunting, fur trapping and fishing remain relevant for a minor part of them. The Nganasan women make leather out of reindeer hides. They also make national footwear, souvenir rugs, handicraft, and fur clothes for their hunters and fishermen. In the settlement of Volochanka, women work at the blue fox fur farm.

Among the religious Nganasans, there are both Orthodox Christians and adepts of the traditional cult.

Evenks

The Evenks (formerly Tungus) are an indigenous people of the Tungusic group living in Eastern Siberia. Their origin is traced back to the 1st millennium AD, when the local population of Eastern Siberia mixed with the Tungus tribes coming from Cisbaikalia and Transbaikalia. Several economic and cultural types of the Evenks formed as a result.

Currently, the Evenks inhabit quite a large territory, from the coast of the Sea of Okhotsk in the east to the Yenisey River in the west, from the Arctic Ocean in the north to Cisbaikalia and the Amur River in the south; outside Russia, the Evenks live in Manchuria (China) and Mongolia. The number of the Evenks registered in Russia is 39,226 people. About 50% of them live in Yakutia, 10% in the Krasnoyarsk Territory,

another 10% in the Khabarovsk Territory, and the rest in Buryatia, Amur Region, Irkutsk Region, and Trans-Baikal Territory.

The principal livelihoods of the Yenisey Evenks are taiga reindeer herding, hunting, and to a lesser extent seasonal fishing. The Evenks also developed cattle farming traditions adopted by southern groups of the Evenks from Mongolian groups.

The handicraft of the Evenks includes artistic bone and wood carving, metal working, beading, embroidery in silk, appliqué in fur and fabric, and birch bark embossing.



Komi

The Komi (formerly Zyrian) are a Finno-Ugric people living in Russia, the indigenous population of the Republic of Komi. There are 143,500 Komi in Russia, with most of them living in the Republic of Komi. The Komi also live in the Arkhangelsk, Murmansk, Kirov and Omsk regions, as well as in other regions of Russia, in small enclaves and mixing with the local population.

Their main ethnographic groups are Komi of the Vychegda River, Komi of the Vym River, Komi of the Izhma River, Komi of the Pechora River, Komi of the Luza River, Komi of the Sysola River and Komi of the Vashka and Mezen Rivers.

Their direct ancestors are ethnic-territorial groups of the Vychegda Perm, which were formed back in the 10–14th centuries based on the local tribes of hunters and fishermen as a result of their active contacts with Perm tribal groups coming from the Upper Kama River area. The ethnogenesis of the Komi was influenced by a number of neighbouring peoples, including the Veps, ancient Mari, ancestors of the Ob River Ugrians, East Slavs and others.

The Komi's traditional livelihood is arable farming (barley and rye). For their personal needs, they raised cattle, sheep and horses. The northern Komi (those of the Izhma River) herded reindeer, adopting this activity from the Nenets in the 17th century. Other ethnic groups of the Komi also engaged in fur trapping and fishing for valuable

species of fish and traded in the respective products. Their ancillary activities included berrying, nutting, and preserving birch sap and mushrooms (except for the Komi of the Izhma River). As for indoor activities, the Komi engaged in weaving, spinning, dyeing homespun cloths, cloth printing, dressing furs, making suede and footwear, hooping, and making spoons and mats.

The traditional Komi house is a log cabin on a high basement. In southern regions, they usually made one-storeyed houses. The northern Komi built two-storeyed houses at the end of the 19th century.

Most of the Komi are Orthodox Christians (since the end of the 14th century), some of them are Old Believers.



Requirements for suppliers to respect human rights as part of supply chain responsibility commitments

CHRB B.1.4.b, B.1.7, IRMA 1.3.3.3

The focus on ESG matters, including respecting human rights, is made not only within the Company but at each and every stage of the life cycle: Nornickel makes sure that the sustainability principles are observed in its relations with mineral suppliers and delivers high-quality products promoting innovations in its relations with consumers.

As regards responsible procurement, the Company has developed the Responsible Sourcing Policy, the Supplier Code of Conduct and other by-laws¹ and strictly abides by their provisions. If suppliers refuse to comply with the Code or, failing to do so, they do not clearly demonstrate their intention to address the deficiencies, the Company may reconsider its relationship with such suppliers.

In 2022, a provision on ESG compliance, which inter alia includes human rights, was added to 1,313 contracts and master agreements with suppliers.

To monitor suppliers' compliance with the requirements of the Supplier Code of Conduct and select the best suppliers based on the ESG criteria, Nornickel has introduced a special due diligence management system that helps assess suppliers against the ESG criteria, including those in human rights, and also check the extent of the suppliers' compliance. No risks were identified as a result of due diligence of mineral suppliers in 2022.

In 2021, Kola MMC became the first company in Russia that underwent an independent external audit for compliance with the RMI's ESG Standard, which confirmed that the Company's production is in full compliance with the national laws, health and safety requirements, and industrial, fire and environmental safety standards. In addition, the audit checked the human rights due diligence system. The audit reported no critical negative findings that would require an immediate response, and Kola MMC was reaffirmed as RMI Active in cobalt and nickel².

In 2023, the Company plans to introduce the Supplier Self-Assessment Questionnaire and the respective training for suppliers in the supply chain.

➔ For more details on the introduction of the supplier due diligence system, please see [Nornickel's Responsible Supply Chain Report for 2021–2022](#).

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vk.com/nornickel_official ➔

youtube.com/user/NornikOfficial ➔

Corporate website

<https://www.nornickel.com/> ➔

Human rights at Nornickel

<https://www.nornickel.com/> ➔

Nornickel's by-laws

<https://www.nornickel.com/> ➔

[Nornickel's 2022 Sustainability Report](#)

[Nornickel's Responsible Supply Chain Report for 2021–2022](#)

¹ All of the Company's by-laws are available on its official website at <https://www.nornickel.com/investors/disclosure/corporate-documents/>.

² Valid from 22 June 2022 to 31 January 2023.

List of abbreviations

CHI	Compulsory health insurance
CHRB	Corporate Human Rights Benchmark
COVID-19	Coronavirus disease
ESG	Environmental, Social and Governance
FIFR	Fatal-Injury Frequency Rate
FPIC	Free, Prior and Informed Consent
ICMM	International Council on Mining and Metals
ILO	International Labour Organisation
IRMA	Initiative for Responsible Mining Assurance
Kola MMC	Kola Mining and Metallurgical Company
KPI	Key performance indicators
LTIFR	Lost Time Injury Frequency Rate
NID	Norilsk Industrial District
OHS	Occupational health and safety
RMI	Responsible Minerals Initiative
SDGs	UN Sustainable Development Goals
SO2	Sulphur dioxide
SRM	Supplier relationship management
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

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 business units
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 and 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
Mediation	method of alternative dispute resolution based on finding a mutually acceptable solution through the mediation of an impartial third party (independent expert)
Norilsk Nickel Group	MMC Norilsk Nickel and the totality of operations forming Nornickel Group. Unless otherwise specified or required by the context, the terms "Company", "Group", "Nornickel" or "the Group companies" shall mean Nornickel Group
Risk	the effect of uncertainty on objectives
Stakeholder engagement	the Company's activities aimed at identifying stakeholders' expectations and concerns and their engagement in decision-making process
Stakeholders	individuals and legal entities or their groups having certain expectations about the Company or affected by its operations, influencing its managerial decisions while being themselves influenced by such decisions. Stakeholders include the Company's shareholders, investors, employees, suppliers, contractors, consumers, trade unions and other public organisations, mass media, residents of areas where the Company operates, and others

Indicators under the Initiative for Responsible Mining Assurance (IRMA). Critical requirements for human rights

Criterion	Section/comment	Page
Principle 1: Business integrity		
Chapter 1.2: Community and stakeholder engagement requirements		
1.2.2.2	section "Stakeholder engagement"	p. 21-23
Chapter 1.3: Human rights due diligence requirements		
1.3.1.1	section "Commitment to human rights"	p. 15-16
1.3.1.2	section "Commitment to human rights"	p. 15-16
1.3.2.1	section "Identification and assessment of human rights risks and impacts"	p. 17-19
1.3.3.3	section "Requirements for suppliers to respect human rights as part of the supply chain responsibility commitments" section "Identification and assessment of human rights risks and impacts" The Company liaisons with representatives of regulatory authorities whose engagement is required by the Russian laws (for instance, participation in court cases and accident and fatality investigation)	p. 17-19 , 52
Chapter 1.4: Complaints and grievance mechanism and access to remedy		
1.4.1.1	section "Stakeholder engagement" , subsection "Grievance policy"	p. 24-27

Criterion	Section/comment	Page
Principle 2: Planning and managing for positive legacies		
Chapter 2.1: Environmental and social impact assessment and management		
2.1.3.1	Divisions assess their environmental impact in line with national laws, including direct impact and impact in case of certain accidents, and have in place environmental action plans. Social impact assessment (including potential impact on communities and employees) is expected to be introduced in the future	-
Chapter 2.2: Free, Prior and Informed Consent (FPIC) requirements		
2.2.2.2	section "Rights of local and indigenous communities" , subsection "Free, Prior and Informed Consent"	p. 45-46
Chapter 2.4: Resettlement		
2.4.7.1	The relocation of Tukhard's residents will be performed fully in line with the FPIC procedure and in accordance with a relevant agreement signed with the Council of Representatives of the settlement. In autumn 2023, the Company plans to sign an agreement to reflect all the Plans referred to by the IRMA Guidance	-
Principle 3: Social Responsibility		
Chapter 3.1: Fair labour and terms of work		
3.1.2.1	section "Employee right to freedom of association and collective bargaining"	p. 41-42
3.1.3.3	In line with MMC Norilsk Nickel's Human Rights Policy, the Company ensures that its employees are protected at their workplaces against any form of physical, verbal or psychological harassment, aggression or threats from their colleagues and management. Women's rights: section "Labour rights" , subsection "Employment, headcount by location and gender"	p. 33-35
3.1.5.1	section "Stakeholder engagement" , subsection "Grievance policy"	p. 24-27
3.1.7.2	The Company has a ban on child labour	p. 8
3.1.7.3	The Company does not hire people aged under 18	p. 8
3.1.8.1	The Company has a ban on forced labour. The Company does not engage in human trafficking	p. 8
Chapter 3.2: Occupational health and safety requirements		
3.2.4.1. (critical requirement - a and b only)	section "Basic employee rights" , subsection "Occupational health" section "Employee right to safety, including occupational health and safety"	p. 31-32 , 40-41
Chapter 3.3: Community health and safety		
3.3.1.1	In 2022, the Company conducted a preliminary assessment of human rights impact, which included community health and safety (section "Identification and assessment of human rights risks and impacts")	C. 17-19

Criterion	Section/comment	Page
Chapter 3.4: Mining and conflict-affected or high-risk area requirements		
3.4.2.1	Nornickel does not operate in conflict-affected or high-risk areas and conducts a thorough analysis of its supply chain in this regard	–
Chapter 3.5: Security arrangements (requirements)		
3.5.1.2	Nornickel has not adopted a separate policy on security arrangements, including the use of force and firearms by security personnel. The Company complies with relevant Russian laws, which are aligned with the IRMA requirements	–

Indicators under the International Council on Mining and Metals (ICMM)

Performance Expectations (PE)

Indicator	Section/comment	Page
3. Human rights		
3.1 Respect human rights	section “Commitment to human rights”	p. 15–17
3.2 Avoid involuntary resettlement	The Company does not implement projects involving withdrawal of residents’ lands and compulsory resettlement. There have been no recorded disputes on land use with local communities. The Company seeks to improve living conditions for local residents: Nornickel was the first company to introduce the FPIC procedure for Tukhard’s residents in the Arctic (section “Rights of local and indigenous communities” , subsection “Free, Prior and Informed Consent”)	p. 45
3.3 Manage security while protecting human rights	The Company has in place a security matrix, including a risk component of assets’ physical security: part of the Company’s assets is protected by the National Guard of the Russian Federation, and Nornickel also relies on paid security services	–
3.4 Respect the rights of workers	section “Nornickel’s approach and commitments” section “Employee right to freedom of association and collective bargaining” section “Stakeholder engagement” , subsection “Grievance policy”	p. 8 , 24 , 41
3.5 Provide fair pay and working hours	section “Labour rights” , subsection “Fair remuneration and working hours”	p. 36–37
3.6 Respect indigenous peoples	section “Rights of local and indigenous communities” , subsection “Rights of indigenous peoples”	p. 45–47
3.7 Work to obtain Free, Prior and Informed Consent	section “Rights of local and indigenous communities” , subsection “Free, Prior and Informed Consent”	p. 45
3.8 Promote workplace diversity	section “Labour rights” , subsection “Employment, headcount by location and gender”	p. 35
3.9 Promote an inclusive workplace	section “Labour rights” , subsection “Equal rights and opportunities”	p. 37–38

Indicator	Section/comment	Page
4. Risk management		
4.1 Assess environmental and social risks	The Company assesses environmental and social risks for both new investment projects and significant operational changes, such as closure of production facilities in Nickel and Monchegorsk. The Company has implemented comprehensive social initiatives to mitigate arising risks (section "Labour rights", subsection "Social benefits in case of production shutdown")	-
4.2 Apply due diligence in conflict-affected or high-risk areas	Nornickel does not operate in conflict-affected or high-risk areas and conducts a thorough analysis of its supply chain in this regard	-
4.3 Systematically manage health, safety and environmental risks	The Company has in place a reliable risk management system based on guiding principles of international standards (including COSO and ISO), which covers inter alia management of risks and opportunities in sustainable development. For more details, please see Nornickel's 2022 Sustainability Report	-
5. Health and safety		
5.1 Continually improve health and safety	section " Basic employee rights ", subsection " Occupational health and safety "	p. 31-33 , 40-41
5.2 Provide health and safety training	section " Basic employee rights ", subsection " Occupational health and safety "	p. 31-33 , 40-41
9. Social performance		
9.1 Contribute to community development	section " Rights of local and indigenous communities ", subsection " Improving the living standards for local communities "	p. 46-47
9.2 Support local economic opportunities	Nornickel develops mutually beneficial relationships with local businesses in the regions where it operates. The synergies created as part of this cooperation and the integration of local businesses into the Group's production through long-term contracts contribute to the economic development of the regions and support for small and medium-sized enterprises across the Company's footprint. For more details, please see Nornickel's 2022 Sustainability Report	-
9.3 Conduct local stakeholder engagement	section " Stakeholder engagement ", subsection " Interaction with local communities and indigenous peoples " section " Stakeholder engagement ", subsection " Grievance policy "	p. 22-23
9.4 Collaborate on artisanal mining challenges	Not applicable	-
10. Stakeholder engagement		
10.1. Engage corporate stakeholders transparently	section " Stakeholder engagement "	p. 21-23

Position Statements (PS)

Commitment	Section/comment	Page
Indigenous peoples and mining: position statement		
1	section " Rights of local and indigenous communities " In 2020, the Company launched an ethnological review to assess the impact of the environmental incident at NTEC's HPP-3 on indigenous peoples. Following the review, certain communities received compensations and the Company developed sustainability measures in collaboration with representatives of indigenous minorities. Based on the review, Nornickel and associations of indigenous peoples signed a Cooperation Agreement through 2024. Total investment under the agreement exceeds RUB 2 bn	p. 45-51
2	The Company is committed to open discussion of matters pertaining to indigenous peoples and cooperation in the regions of its operation in the form of consultations with non-governmental organisations representing indigenous communities	-
3	Nornickel works closely with federal and regional authorities to protect the interests of indigenous peoples. The interaction (representatives, timeline, initiatives and risks) with indigenous communities is reflected in the Stakeholder Engagement Plan	-
4	section " Rights of local and indigenous communities ", subsection " Free, Prior and Informed Consent "	p. 45
5	Nornickel works closely with federal and regional authorities to protect the interests of indigenous peoples	-
6	Relevant conditions are covered by the FPIC procedure performed in line with international standards	-

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	section “Commitment to human rights”	p. 15–17
A.1.2.a Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	section “Commitment to human rights” For more details, please see MMC Norilsk Nickel’s Human Rights Policy ¹	p. 15–17
A.1.2.b Commitment to respect the human rights of workers: Health and safety and working hours	section “Commitment to human rights” For more details, please see the Working Conditions Policy ²	p. 15–17
A.1.3.a Commitment to respect human rights particularly relevant to the sector: Land, natural resources and indigenous peoples’ rights	section “Rights of local and indigenous communities” , subsection “Free, Prior and Informed Consent” For more details, please see MMC Norilsk Nickel’s Indigenous Peoples’ Rights Policy ³	p. 45
A.1.3.b Commitment to respect human rights particularly relevant to the sector: Security	section “Nornickel’s approach and commitments”	p. 6
A.1.4 Commitment to remedy	The Company is working on remedies to be included in the updated grievance mechanism	–
A.1.5 Commitment to respect the rights of human rights defenders	section “Stakeholder engagement”	p. 21

A.2 Board level accountability		
A.2.1 Commitment from the top	section “Governance, responsibilities and oversight”	p. 12–13
A.2.2 Board responsibility	section “Governance, responsibilities and oversight”	p. 12–13
A.2.3 Incentives and performance management	section “Governance, responsibilities and oversight”	p. 11
A.2.4 Business model strategy and risks	section “Governance, responsibilities and oversight”	p. 10
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	section “Governance, responsibilities and oversight” For more details on the allocation of responsibilities as regards human rights commitments, please see MMC Norilsk Nickel’s Human Rights Policy ¹	p. 12–13
B.1.2 Incentives and performance management	section “Governance, responsibilities and oversight”	p. 11
B.1.3 Integration with enterprise risk management	section “Identification and assessment of human rights risks and impacts”	p. 17–19
B.1.4.a Communication/ dissemination of policy commitment(s): Workers and external stakeholders	Through the Company’s official website, Nornickel’s by-laws are made available to a wide range of stakeholders. The HR Department makes sure that the Company’s employees are informed about, and comply with, its policies	–
B.1.4.b Communication/ dissemination of policy commitment(s): Business relationships	section “Requirements for suppliers to respect human rights as part of supply chain responsibility commitments”	p. 52
B.1.5 Training on human rights	section “Human rights training”	p. 27
B.1.6 Monitoring and corrective actions	The Company implements the following measures to monitor and assess the implementation of MMC Norilsk Nickel’s Human Rights Policy: <ul style="list-style-type: none"> • monitoring of the annual Stakeholder Engagement Plan implementation and results; • analysis of human rights activities for reporting in line with the ICMM Guidance; • conducting an independent verification of accounting of the Company’s key production units once every three years. MMC Norilsk Nickel’s Human Rights Policy was updated in 2021 	–
B.1.7 Engaging and terminating business relationships	section “Requirements for suppliers to respect human rights as part of supply chain responsibility commitments”	p. 52

¹ MMC Norilsk Nickel’s Human Rights Policy is available on the Company’s official website at https://www.nornickel.com/upload/iblock/df8/PJSC_MMC_Norilsk_Nickel_Human_Rights_Policy.pdf.

² The Working Conditions Policy is available on the Company’s official website at https://www.nornickel.com/files/en/corporate_documents/constituent_documents/Working-Conditions_Policy-en-new.pdf.

³ MMC Norilsk Nickel’s Indigenous Peoples’ Rights Policy is available on the Company’s official website at https://www.nornickel.com/upload/iblock/e61/qzo3cl1fy5uvx5y5e8kqjchkc0j1i91/pjsc_mmc_norilsk_nickel_indigenous_peoples_rights_policy.pdf.

¹ MMC Norilsk Nickel’s Human Rights Policy is available on the Company’s official website at https://www.nornickel.com/upload/iblock/df8/PJSC_MMC_Norilsk_Nickel_Human_Rights_Policy.pdf.

B.1.8 Approach to engaging with affected stakeholders	section “Stakeholder engagement”	p. 21–23
B.2 Human rights due diligence	Human rights due diligence has been implemented by the Company since 2022	
B.2.1 Identifying human rights risks and impacts	section “Identification and assessment of human rights risks and impacts”	p. 17–19
B.2.2 Assessing human rights risks and impacts	section “Identification and assessment of human rights risks and impacts”	p. 17–19
B.2.3 Integrating and acting on human rights risks and impact assessments	The Company currently manages health and safety and environmental risks (for more details, please see Nornickel's 2022 Sustainability Report). Going forward, Nornickel plans to streamline its processes for integrating and acting on human rights risks and impact assessments	–
B.2.4 Tracking the effectiveness of actions to respond to human rights risks and impacts	As at the end of 2022, the Company monitors compliance with regulatory and procedural guidelines on human rights. The other monitoring elements are to be adopted and implemented	–
B.2.5 Communicating on human rights impacts	As at the end of 2022, the Company maintains the human rights section of its website, cooperates with analytical agencies and searches for and selects partners and associations. The other communication elements are to be adopted and implemented	–
C: Remedies and grievance mechanisms		
C.1 Grievance mechanism(s) for workers	The principal grievance and claim mechanism for employees is the Corporate Trust Line launched in 2010	p. 24–27
C.2 Grievance mechanism(s) for external individuals and communities	External stakeholders can contact the Corporate Trust Line and use an additional grievance mechanism for external stakeholders implemented in 2022	p. 24–27
C.3 Users are involved in the design and performance of the mechanism(s)	section “Stakeholder engagement” , subsection “Grievance policy”	p. 26
C.4 Procedures related to the grievance mechanism(s) are equitable, publicly available and explained	section “Stakeholder engagement” , subsection “Grievance policy”	p. 24
C.5 Prohibition of retaliation for raising complaints or concerns	section “Stakeholder engagement” , subsection “Grievance policy”	p. 24
C.6 Company involvement with state-based judicial and non-judicial grievance mechanisms	section “Stakeholder engagement” , subsection “Grievance policy”	p. 25
C.7 Remedying adverse impacts	The Company and operations forming Nornickel Group take measures to prevent and eliminate violations of human rights at all units	–
C.8 Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	section “Stakeholder engagement” , subsection “Grievance policy”	p. 25

D: Company human rights practices		
D.3.1 Living wage ¹	section “Labour rights” , subsection “Fair remuneration and working hours”	p. 36
D.3.2 Transparency and accountability ¹	In 2022, the Extractive Industries Transparency Initiative (EITI) informed Nornickel that the process of the Company's joining was suspended. Nornickel discloses production results and accounting statements prepared under the RAS and IFRS on the Company's website. The Company also discloses public data on its tax payments broken down by type and country (for more details, please see Nornickel's 2022 Sustainability Report)	–
D.3.3 Freedom of association and collective bargaining ¹	section “Employee right to freedom of association and collective bargaining”	p. 41–42
D.3.4 Health and safety: Fatalities, lost days, injury, occupational disease rates ¹	section “Employee right to safety, including occupational health and safety”	p. 40–41
D.3.5 Indigenous peoples' rights and Free, Prior and Informed Consent ¹	section “Rights of local and indigenous communities” , subsection “Rights of indigenous peoples”	C. 45
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 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 2022 Sustainability Report)	–
D.3.7 Security ¹	section “Employee right to safety, including occupational health and safety”	p. 40–41
D.3.8 Water and sanitation ¹	In 2022, 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 (for instance, keeping water recycling and reuse rates above 80%). To reduce its environmental impact, the Company implements environmental initiatives and programmes (for example, the maintenance and operation of the auxiliary fleet which serves to prevent river water contamination). For more details, please see Nornickel's 2022 Sustainability Report	–
D.3.9. Women's rights ¹	section “Labour rights” , subsection “Employment, headcount by location and gender”	p. 35

¹ In own extractive operations.

E: Response to serious allegations

<p>E.1 The company has responded publicly to the allegation</p>	<p>In 2020, a backup diesel fuel storage tank at HPP-3 of NTEC failed due to unsealing. Following the completion of all measures to mitigate the consequences of the fuel spill, the Company developed its White Paper on NTEC's HPP-3 Incident Clean-Up and Response, which is intended for a wide range of stakeholders and aims to present the official position of the Company on the causes of the incident, the clean-up and compensatory measures taken, as well as organisational changes implemented to prevent similar incidents in the future</p>
<p>E.2 The company has investigated and taken appropriate action</p>	<p>Immediately after the incident at HPP-3, Nornickel and its partners initiated a technical investigation into the causes of the fuel spill, which included technical, organisational, and other causes. The incident mainly resulted from flaws in the design (1981) and construction (1984) of tank No. 5. Based on the investigation into the causes of the incident, the Company launched a set of measures aimed at improving industrial safety and mitigating physical risks as well as the odds of environmental incidents going forward</p>
<p>E. The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)</p>	<p>The incident did not affect the city and other local settlements, or involve any human casualties. The Company initiated an ethnological expert review to assess the impact on indigenous Northern minorities. The key impact was on the soil and water bodies near the tank farm</p>

For more details, please see the [White Paper on NTEC's HPP-3 Incident Clean-Up and Response](#).

For more details and video content on the clean-up operation following the incident at HPP-3, please see [the Company's official website at www.nornickel.com/sustainability/cleanup/](#)

Disclaimer

The information contained herein relies on the data available to MMC Norilsk Nickel as at the date of this Human Rights Report. After this Human Rights Report was prepared, the Company's operations as well as forecasts and overview of the current situation presented in the Human Rights Report may have been affected by external or other factors, including the 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, Russian individuals and legal entities, Russian Federation's response to sanctions, economic and other measures introduced to maintain the economic and financial stability of the Russian Federation, the COVID-19 pandemic and other factors beyond the Company's control. In particular, the United States, the European Union, the United Kingdom, and other nations have imposed export controls against the Russian Federation that restrict, among other things, supply of industrial equipment to the Russian Federation. These export controls may have a negative impact on the manufacturing capabilities of MMC Norilsk Nickel, should it be unable to purchase and deliver equipment to the Russian Federation.

The Human Rights Report discloses the Company's short-, medium-, and long-term goals and plans. All plans and intentions outlined in this Human Rights Report are provisional and subject, among other things, to a number of economic, political and legal factors, including the factors mentioned above, beyond Nornickel'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 MMC Norilsk Nickel operates may differ materially from those expressed or implied by the forward-looking statements contained in this Human Rights Report. MMC Norilsk Nickel hereby disclaims any liability for any loss resulting from the use of this Human Rights 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 independently verified, and the financial and operating performance metrics of MMC Norilsk Nickel'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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¹ In own extractive operations.