

2020

Occupational Health and Safety Policy

As a global leader in nickel and palladium production, **MMC Norilsk Nickel (the "Company")** strives to achieve excellence in occupational health and safety, being aware of its responsibility for protecting the lives and health of the employees throughout its operations.

The Company's objectives:

- create a safe and healthy environment through introducing advanced technologies and scientific achievements to the production processes, including mandatory internal reviews for safety compliance at feasibility and design stages, and by prioritising the lives and health of the employees as compared to operating performance;
- foster sustainable employee motivation for safe workplace behaviour and train employees in anticipation and prevention of workplace incidents.

To that end, the Company focuses on the following aims:

- improve occupational safety at the Company's production facilities by ensuring reliable, safe and accident-proof operation of the equipment;
- work to reduce risks, including harmful and hazardous occupational factors associated with threat to the lives and health of employees, and moving away from the practices of accident investigation to analysing incidents and managing risks inherent in employee activities, workplace conditions, and state of equipment and facilities;
- enhance the occupational health and safety management system in line with international best practices and global expertise tailored to the Company's circumstances and operations;
- improve the efficiency of industrial control over compliance with occupational health and safety requirements;
- instil and develop individual and collective responsibility of employees for compliance with occupational health and safety requirements;
- promote and actively introduce Russian and international best practices in fostering sustainable employee motivation for safe workplace behaviour and responsibility for their life and health and the lives and health of co-workers.

In occupational health and safety, the Company is committed to:

- ensuring compliance with federal and regional laws and regulations, international agreements, and industry standards and rules governing the Company's occupational health and safety activities, as well as other requirements the Company agreed to honour;
- managing risks related to occupational health and safety, carrying out special assessments of working conditions and developing and implementing programmes based thereon with a view to preventing workplace accidents and occupational diseases, and keeping employees informed about working conditions;
- taking steps to mitigate the risk of accidents, containing those if they occur, and preventing them from affecting areas outside the Company's production facilities;
- coordination with employees of the Company's hazardous production facilities and their representatives on matters related to occupational safety;
- consistently engaging all of the Company's employees in activities related to occupational health and safety, and taking measures to improve said engagement;
- introducing continuous training for employees in safe workplace conduct and fostering sustainable behavioural patterns focused on occupational health;
- ensuring continuous improvement of the occupational health and safety management system as a component of the Company's sustainable competitive edge;
- protecting employees from adverse health effects resulting from production activities, implementing effective work and rest schedules, improving social and working conditions at production facilities, and implementing effective means of collective and individual protection;
- putting in place mechanisms to compensate for the harm caused to employees as a result of adverse working conditions, implementing rehabilitation plans for employees involved in workplace accidents or affected by occupational diseases, and implementing specific health resort treatment programmes for employees;
- reviewing, adjusting and improving MMC Norilsk Nickel's Occupational Health and Safety Policy as needed;
- maintaining public accountability for occupational health and safety performance and implementing this Occupational Health and Safety Policy as part of a social partnership and direct dialogue between the employer and the employee.