



APPROVED
by resolution of the Board of Directors
of PJSC "MMC "Norilsk Nickel"
No. GMK/31-pr-sd of September 18, 2017

Working Conditions Policy

Objective

PJSC "MMC "Norilsk Nickel" (the "Company" or "Nornickel") undertakes to protect the rights of its employees and provide them with good working conditions. This Working Conditions Policy (the "Policy") defines the key elements of the Company's approach in this area.

This Policy should be read in conjunction with [the Health and Safety Policy](#) and other relevant policies.

Scope

This Policy is applicable to all Nornickel employees. The Company takes all the necessary and reasonably possible steps to cause its subsidiaries to comply with the key principles and provisions of this Policy. To the extent possible, the Company also expects its contractors to comply with the principles and provisions of this Policy.

General information

Nornickel's obligation to provide the employees with good working conditions is stipulated in the Company's collective bargaining agreement.

The working time across all Nornickel's operations is in compliance with applicable Russian laws and international regulations.

Nornickel uses a time-keeping system to keep track of actual working hours of each employee to ensure compliance with the laws of Russia and other jurisdictions where the Company operates.

Working time

The working time at Nornickel operations is subject to the following key conventions:

- the working week must not exceed 40 hours (except for when a cumulative approach to time-keeping is used or when there are no fixed working hours or as otherwise provided by Russian labour laws, when employees may be requested to work outside the regular working hours) and every employee is entitled to a minimum uninterrupted rest period of 42 hours per week;
- the working time for production staff must not exceed 8 hours a day (except for when a cumulative approach to time-keeping is used or when there are no fixed working hours or as otherwise provided by Russian labour laws, when employees may be requested to work outside the regular working hours);
- for full-time employees working between 10:00 pm and 6:00 am, working time is to be reduced by one hour without the need to compensate for this one hour;
- employees are entitled to a minimum rest break of 30 minutes per every working day. This time is not taken into account when calculating duration of an employee's working day. At some jobs, employees are entitled to additional rest breaks due to specific process flow requirements and for production and labour management purposes;
- employees may be requested to work overtime (only subject to their written consent, unless permitted otherwise by the applicable labour laws of Russia, when employees may be required to work overtime without their consent);
- overtime work must not exceed 4 hours during two consecutive days and 120 hours a year;
- employees are entitled to the paid job-protected annual basic and additional leaves;
- employees may work at a second job outside their main working hours. The second job may be taken by an employee with his or her principal or another employer, but it must not exceed 4 hours a day. When having a day-off at the principal place of employment, an employee may have a full-

time working day (shift) at the second job. The time worked at the second job within one month (or another period of time) must not exceed half of the monthly work time limit (or work time limit for another period) determined for relevant employee categories;

- the Company does not use forced labour;
- the Company does not use child labour and conducts thorough candidate checks before hiring staff to avoid using child labour.

Remuneration

Each employee's salary depends on several factors, including job position, level of complexity of job duties and his or her skills and qualifications.

The Company seeks to implement a remuneration structure, where each employee's remuneration would consist of the fixed (70%) and variable (30%) components, the latter attached to KPIs.

The average salary paid to Nor Nickel's employees is well above Russia's average, and can compete with salaries in peer companies.

Initiatives

The Company regularly publishes information on the remuneration package structure, incentive systems and average salary paid to employees in the corporate social responsibility and annual reports.