

Material topics	GRI disclosures	Norilsk Division	Kola Division ¹	Trans-Baikal Division	Energy Division	Sales Division ¹	Head Office	Other Group assets
Responsible exploration and land reclamation	–	●	●	●	●	●	●	●
Impact of transport on water bodies	–	●	●	●	●	●	●	●
Supply chain responsibility	308-1, 308-2, 414-1, 414-2	●	●	●	●	●	●	●
Corporate governance and risk management	2-9–2-20	●	●	●	●	●	●	●
Anti-corruption and business ethics	205-1, 205-2, 205-3	●	●	●	●	●	●	●
Respect for human rights (including those of indigenous minorities)	401-3	●	●	●	●	●	●	●
	402-1	●	●	●	●	●	●	●
	405-1	●	●	●	●	●	●	●
	406-1	●	●	●	●	●	●	●
	407-1	●	●	●	●	●	●	●
	408-1	●	●	●	●	●	●	●
	409-1	●	●	●	●	●	●	●
	411-1	●	●	●	●	●	●	●
413-2	●	●	●	●	●	●	●	

DEFINITION OF MATERIAL TOPICS

GRI 3-1, 3-2

Nornickel identifies material topics on an annual basis in accordance with the international GRI Standards, which

provide for a comprehensive assessment of sustainability impacts, taking into account feedback from stakeholders.

In 2023, the Company approved an appropriate procedure consisting of the following stages:

Stage	Description	Results
Stage 1. Identifying impacts	Nornickel's Sustainable Development Department supported by external consultants (the "Working Group") made a base list of the Company's actual and potential economic, environmental, and social impacts, including those related to human rights. This list includes 27 sustainable development impacts of the Company. Analysis of the Company's business context ¹ identified no impacts other than in 2022	List of 27 actual and potential impacts of the Company.
Stage 2. Assessing impacts	In an online questionnaire, external and internal stakeholders were asked to rate potential and actual impacts on a scale of 0 to 5 based on the key parameters recommended by the GRI Standards: <ul style="list-style-type: none"> likelihood/regularity of impact; severity of impact (including irreversibility of impact²); scope (scale) of impact. <p>The respondents were also given the opportunity to assess the quality of disclosure of material sustainability topics in the 2022 Sustainability Report and make comments and suggestions on topics of particular interest. This Reports reflects most of the comments.</p> <p>The Working Group analysed all the questionnaires for adequacy and completeness. Non-identifiable, partially completed, and improperly completed questionnaires were excluded from the final analysis.</p> <p>In 2023, 361 questionnaires (23% completed by external stakeholders, 77% completed by internal stakeholders) were taken into account to assess impacts. The number of questionnaires received and taken into account is 63.3% higher than in 2022</p>	361 questionnaires with impact assessments completed by stakeholders

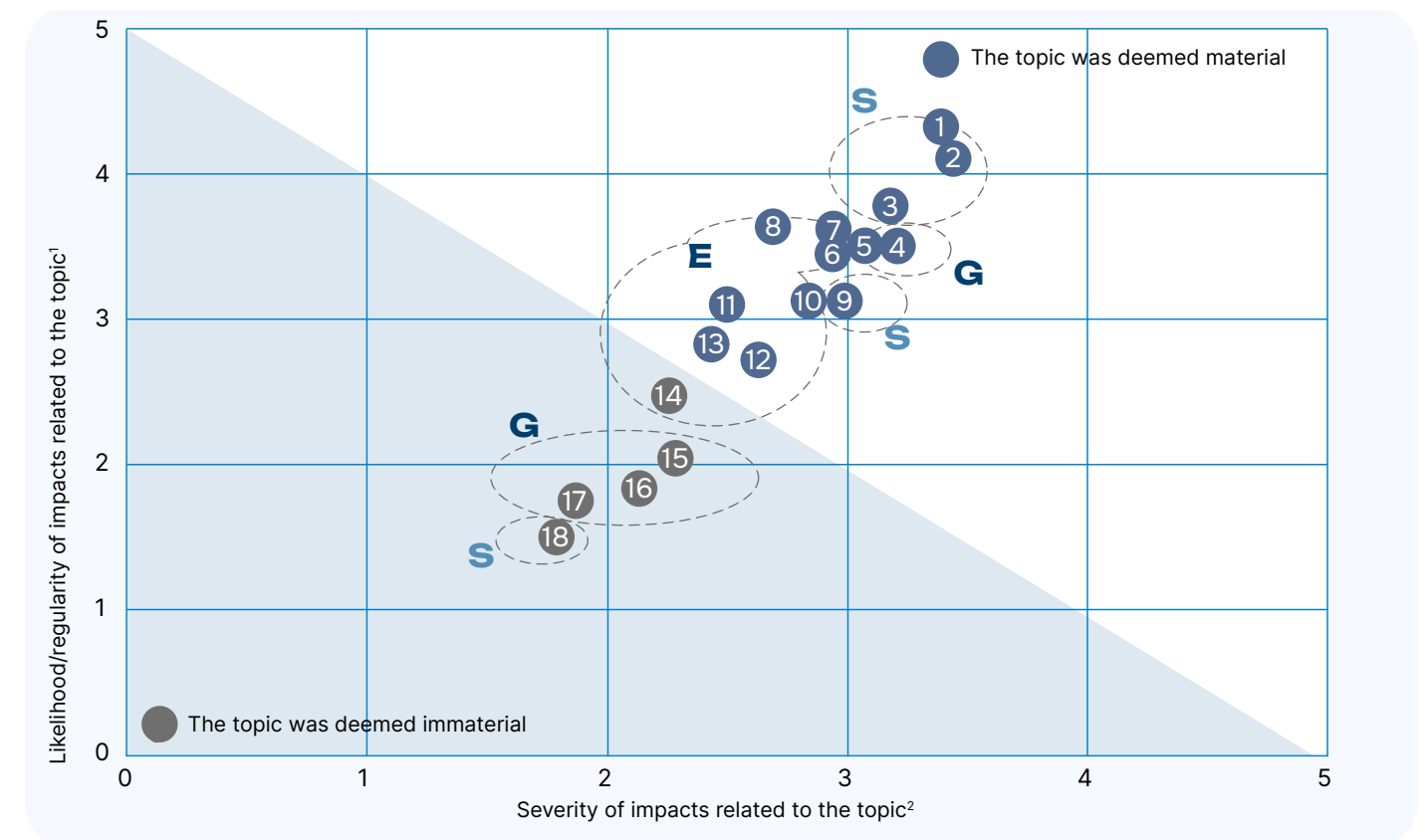
¹ Excluding foreign business units.

¹ Including core activities, business relationships, and sustainability context.

² Respondents assessed the irreversibility of impacts based on a Y/N scale.

Stage	Description	Results
Stage 3. Making a prioritised list of topics	<p>In the analysis of questionnaires completed by stakeholders, average scores were calculated for all impacts.</p> <p>For each impact, the severity of the impact was determined (average score for impact severity based on the irreversibility factor and impact scale (scope)), and the likelihood/regularity of the impact was assessed.</p> <p>All impacts were grouped into 18 topics in order to comprehensively analyse and subsequently generate a list of material topics.</p> <p>A materiality matrix reflecting the relative significance of the topics was plotted on the Severity of Impact and Likelihood/Regularity of Impact axes.</p> <p>The Company has set cut-off thresholds for the materiality boundary in the matrix. A value of 5.0 on the sum of coordinate values (rounded) was selected as the cut-off point – 50% of the maximum score. Topics falling below the boundary are deemed non-significant, but information on them is also presented in the Report in accordance with the needs of stakeholders. For immaterial topics, incomplete disclosure of GRI indicators is allowed</p>	List and matrix of 18 topics to be discussed with stakeholders in an open dialogue
Stage 4. Engaging in dialogue with stakeholders	The matrix of material topics generated in the third stage was presented to stakeholders in a dialogue held on 27 November 2023 in a mixed format (offline with a live webcast). Stakeholders reviewed the results and made recommendations on the Report and the details of topics disclosure in the Report	List of stakeholder recommendations to the Report
Stage 5. Finalising the list of material topics	The materiality matrix, which is a result of materiality assessment, was finalised	Finalised matrix with 13 material topics (see below)

Materiality matrix



Prioritised list of topics and associated impacts³

No.	Topic wording	Sustainability impacts
1	Training and education	Training and education
2	Employment and decent working conditions in the regions of operation	Employment and decent working conditions in the regions of operation
3	Contribution to the development of local communities	<p>Payment of taxes to budgets of various levels</p> <p>The Company's charitable activities targeting local communities (including indigenous minorities) and non-profit organisations to support sustainable development</p> <p>Development of housing, energy, and other infrastructure in the regions of operation</p> <p>Support for entrepreneurship in the regions of operation</p>
4	Contribution to the national industry through import substitution	Contribution to the national industry by promoting Russian technology
5	Innovation projects pursuing sustainable development goals	Innovation projects pursuing sustainable development goals

¹ On a scale of 0 to 5, where 0 means no impact and 5 means that impact occurs and is ongoing.

² The average value for the severity of impact (the parameter was assessed on a scale from 0 to 5, where 0 means no effect and 5 – critical effect) and scale and scope of impacts (the parameter was assessed on a scale from 0 to 5, where 0 means no impact and 5 – international scale).

³ Following the prioritisation, the first 13 topics were found to be material.

No.	Topic wording	Sustainability impacts
6	Climate change	Greenhouse gas emissions Development of a climate change monitoring system Metals production needed to combat climate change
7	Emissions	Emissions of sulphur dioxide and other pollutants
8	Waste management	Generation of industrial waste from operations
9	Occupational health and safety	OHS risks for employees and contractors Work-related injuries Occupational disease risks for employees and contractors
10	Biodiversity	Impact on biodiversity in the regions of industrial operations
11	Water consumption and wastewater discharge	Wastewater discharge to water bodies Water withdrawal from water bodies
12	Industrial environmental safety of production facilities (including tailing dumps)	Tailings risks Industrial environmental safety risks
13	Responsible exploration and land reclamation	Land disturbance
14	Impact of transport on water bodies	Pollution of water bodies by sea and river transport
15	Supply chain responsibility	Risks related to the violation of sustainability principles in the supply chain
16	Corporate governance and risk management	Risks related to inadequate corporate governance and risk management
17	Anti-corruption and business ethics	Corruption and business ethics risks
18	Respect for human rights (including those of indigenous minorities)	Risks related to the violation of employee and contractor rights (including wrongdoings, discrimination, etc.) Risks related to the violation of fundamental rights of local communities in the regions of operation (including indigenous minorities)

The final list of material topics contains a number of changes as compared to 2022:

- the most important material topics were Training and Education Employment and Decent Working Conditions in the Regions of Operation, and Contribution to the Development of Local Communities, which means that the importance of the Company's social programmes and commitments to key stakeholders is growing;

- a high level of importance of special topics was noted: Contribution to the National Industry through Import Substitution (the topic rose from the seventh position in 2022 to the fourth position in 2023), Innovation Projects Pursuing Sustainable Development Goals (the topic remained in the Top 5 in 2023) – new technologies created by the Company contribute to objectives of the ESG strategy;

- the topics Impact of Transport on Water Bodies and Supply Chain Responsibility were not included in the list of GRI's material topics for 2023.

→ [For the description of impacts related to material topics, please see the 2022 Sustainability Report.](#)

GRI CONTENT INDEX

Nornickel prepared the Report in accordance with the GRI Standards for the period from 1 January 2023 to 31 December 2023.

Disclosure number	Disclosure	Page/link	Assured by the auditor	Omission	Comments
GRI 1: Foundation 2021					
GRI 2: General Disclosures 2021					
1. The organisation and its reporting practices					
2-1	Organisational details	2, 16	Assured		Nature of ownership – private.
2-2	Entities included in the organisation's sustainability reporting	384	Assured		For a list of entities included in the financial statements of Norilsk Nickel Group, please see the Group's IFRS financial statements
2-3	Reporting period, frequency and contact point	2, 477	Assured		Financial and sustainability reporting is prepared annually for the calendar year. The date of this report is 23 May 2024.
2-4	Restatements of information	2	Assured		Information on changes in previous periods' data is provided in the report in the footnotes below the respective figures.
2-5	External assurance	2, 472	Assured		
2. Activities and workers					
2-6	Activities, value chain and other business relationships	16, 38, 351	Assured		There were no significant changes in the supply chain of the core production process in the reporting year. Due to sanctions imposed on the Russian Federation, the Company is in the process of revising its list of equipment and software suppliers.
2-7	Employees	78, 424	Assured		
2-8	Workers who are not full-time employees	424	Assured		The relations with such employees are mainly formalised through civil law contracts. Such contracts are usually made for temporary work, without any prevailing type of activity. There are no significant hiring fluctuations within the reporting periods, and the changes from one reporting period to another may be associated with an increasing number of FTEs (a part of the functions handed over to FTEs).
3. Governance					
2-9	Governance structure and composition	60, 77, 128, 174, 256, 290, 295, 301, 316, 343	Assured		