



Social risk

The risk relates to increased tension among the workforce due to the deterioration of social and economic conditions in the Company's regions of operation.

- Risk effect: **medium.**
- Risk source: **combined.**
- Risk level change: **none**

Key risk factors

- Projects that have an impact on headcount/staffing;
- failure of some employees and/or third parties to share the Company's values;
- limited opportunities for annual wage indexation;
- dissemination of false and inaccurate information about the Company's plans and operations among the Group's employees;
- reallocation of spending on social programmes and charity

Goals and strategic areas of the Company related to the risk

- Social responsibility:
- partnership with regional and local authorities to develop social infrastructure required to create safe and comfortable living environment for local communities;
 - contribution to the professional and cultural development of employees and building of the talent pool in the regions of operation;
 - ongoing charity programmes and projects

Key mitigants

- To manage this risk, the Company:
- strictly abides by the collective bargaining agreements made between the Group's companies and employees (22 bargaining agreements in total);
 - interacts with regional and local authorities, and civil society institutions;
 - fulfils its social obligations under public-private partnership agreements;
 - runs programmes in accordance with its corporate social policy and the World of New Opportunities charitable programme to support and promote regional public initiatives, including those geared towards the indigenous peoples of the Taimyr Peninsula, and the Plant of Goodness corporate volunteering programme;
 - puts in place infrastructure to enable accelerated development and improved quality of life across the Company's regions of operation in cooperation with the Norilsk Development Agency, the Second School Centre for community initiatives in the Pechengsky District, and the Monchegorsk Development Agency;
 - implements regular social monitoring across the Group's operations;
 - conducts opinion polls among Norilsk's communities to learn more about their living standards, employment, migration trends and general social sentiment, and identify major challenges;
 - implements social projects and programmes aimed at supporting employees and their families, as well as the Company's former employees;
 - engages in dialogues with stakeholders and conduct opinion polls while preparing public sustainability reports of the Group;
 - implements a set of social support initiatives for the personnel facing redundancies as part of Kola MMC's social programmes and develops roadmaps for the social and economic development of the Pechengsky District

TAX STRATEGY

GRI 207-1

Approach to taxation

Nornickel strictly complies with all applicable tax laws of the Russian Federation and other countries of operation¹, while also paying taxes and making other statutory budget payments in a full and timely manner.

The Tax Strategy Policy of Nornickel Group is the key document governing all taxation aspects, including operations of the tax function of MMC Norilsk Nickel and its subsidiaries and management of tax burden and risks.

Nornickel is committed to openness and transparency in its taxation aspects. The Company discloses relevant information for stakeholders on its corporate portal and takes a zero-tolerance approach to non-transparent corporate structures used for tax avoidance.

Group companies use market prices in their reports on intra-group transactions submitted for tax purposes. In line with the applicable transfer pricing laws, the Group complies with the basic

principles set out in the Organisation for Economic Cooperation and Development (OECD) Transfer Pricing Guidelines for Multinational Enterprises and Tax Administrations and follows the laws and regulations of Russia and other countries of operation.

Nornickel takes a conservative approach to all controversial tax issues arising in all jurisdictions across the Group's footprint. The Group considers unacceptable any use of aggressive tax planning schemes.

¹ The Group's foreign entities interpret applicable tax legislation and resolve controversial tax issues independently.



Tax management at Norilsk Nickel Group

GRI 2-9, 2-12, 2-13, 207-2



The tax strategy is developed and monitored by the Head of the Tax Department, who reports to Nornickel's Senior Vice President and CFO. The Company's Management Board approves the tax strategy and critical amendments made to the strategy from time to time.

The Tax Department prepares and communicates internal regulations (guidelines, explanations, information mails) based on the current legislation,

arbitration practice, regulatory clarifications and other circumstances. If necessary, the Tax Department requests specific clarifications from competent authorities or a reasoned opinion of the tax authority required for the companies participating in tax monitoring.

Additionally, the Tax Department is responsible for managing the tax risks of the Group's Russian entities. Tax reassessment and penalty cost

risk factors, contingent tax liabilities, and the opinion of an external auditor confirming the accuracy of tax information are presented in the [Consolidated Statements of the Company for 2023](#).

Cooperation with tax authorities

GRI 207-3

The areas where the Group interacts with tax authorities include:

- exercising tax control;
- seeking clarifications on existing legislation;
- entering into pricing agreements.

Nornickel regularly interacts with tax authorities in the real-time mode through a tax monitoring system, which provides access to the Company's tax and accounting data.

In 2023, the tax monitoring platform evolved in terms of penetration within the Group, while also improving the user

friendliness of its interface, data quality and information exchange speed. This tool proves high automation of reporting and transparency of tax processes.

>97%
of the Group's turnover monitored by tax authorities in real time since 2023

60%
reduction in the number of tax audits

2x
decrease in the number of document requests with corresponding time savings

¹ For more details, please see the [Consolidated Statements of the Company for 2023](#).

CORPORATE SECURITY

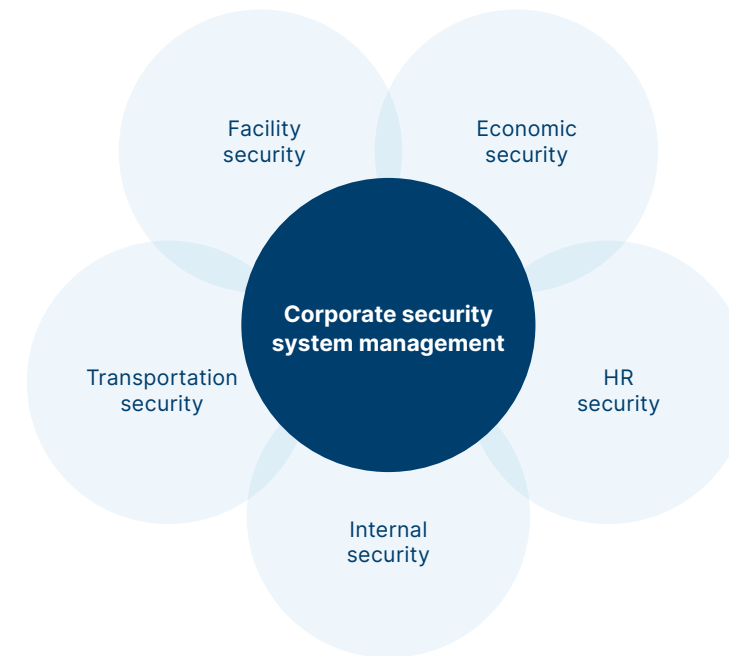
How has the Company's corporate security evolved over the past 20 years?

Corporate security improvements are one of the key drivers behind the resilience of Nornickel's business processes: in 2007, the Company developed professional competence standards for security employees; in 2017, Nornickel oversaw the establishment of the Club of Information Security in Industry, a cross-industry association; in 2018, the Group approved its Information Security Policy, and contributed to the creation of the National Association of International Information Security and drafting of the Security Charter for Critical Industrial Facilities; finally, in 2019, the Company piloted a system of analytical situation centres, which is currently gaining significant momentum. Given current external challenges, we reviewed our approach to information security to reflect continued pivot towards technological sovereignty and transition to a service-based model.



To minimise the Company's exposure to a wide range of risks, Nornickel employs a comprehensive approach suggesting integration of corporate security components into all business processes.

Corporate security components



The Corporate Security Unit manages security issues within the Company, including by coordinating the work of different business units, navigating government relations, monitoring production facilities, preventing incidents, and implementing modern technologies. In 2023, the Corporate Security Unit set up a new function responsible for coordinating the operation of unmanned aerial vehicles and anti-drone activities. Establishment of no-fly zones over categorised corporate facilities will enable security units to protect (where necessary) facilities from drones using cutting-edge technical solutions.

Nornickel is developing a network of analytical situation centres operated through a single analytical software platform for aggregating and processing information required to ensure the security of key business processes. In early 2024, a new segment of the system was put into operation, with Kola MMC joining the Group's corporate security ecosystem.

The regulatory framework for corporate security is defined by the Russian laws, applicable international norms, internal standards and Nornickel's by-laws.

In accordance with the Policy on Countering Corporate Fraud approved by the Board of Directors in 2022, the Company takes consistent steps to prevent, detect and combat abuses, corporate fraud, and corrupt practices. In the reporting year, these activities included:

- embedding violation indicators (signs of price fixing arrangements, conflict of interest, lobbying procurement participants, unjustified restrictions) into the system ensuring the economic security of procurement activities to form a comprehensive basis for abuse prevention;
- upgrading the counterparty due diligence methodology;
- developing a course on combating corporate fraud and integrating it into the Group's employee training framework. This course was successfully completed by the current employees of the Company.

Furthermore, in 2023 we addressed corporate security concerns associated with the implementation of strategic investment projects seeking to protect the legitimate economic interests of the Company in contractor relations, HR and facility security.

A dedicated Centre for Chemical and Forensic Research and Expertise equipped with cutting-edge analytical equipment started operating

on fundamentally new premises to address important economic security issues at production facilities. This helped significantly expand the Centre's remit, enabling it to run a wide range of chemical and analytical tests to provide technical assistance to manufacturing, control and analysis units in assuring product quality, investigating the causes of emergencies at production sites, conducting in-depth chemical, mineralogical and structural research of materials and substances

used in the development of new concentration and metallurgical solutions, and in exercising special external control over the quality and accuracy of non-ferrous and precious metal analysis. The Centre developed a comprehensive methodology for analysing and identifying metal-bearing materials, which earned praise from the International Platinum Group Metals Association.

Nornickel actively collaborates with business partners, metals and mining companies, government authorities and other stakeholders to enhance its corporate security. In 2023, the Company participated in a meeting of the International Platinum Group Metals Association, won a prize at the R&D conference "Transport Safety Formula. Law. Knowledge", and implemented federal security regulations.

In 2023, more than 520 training exercises, 242 joint drills and 22 dedicated tactical drills were held to ensure a high level of facility security workforce and equipment preparedness.

Ensuring information security

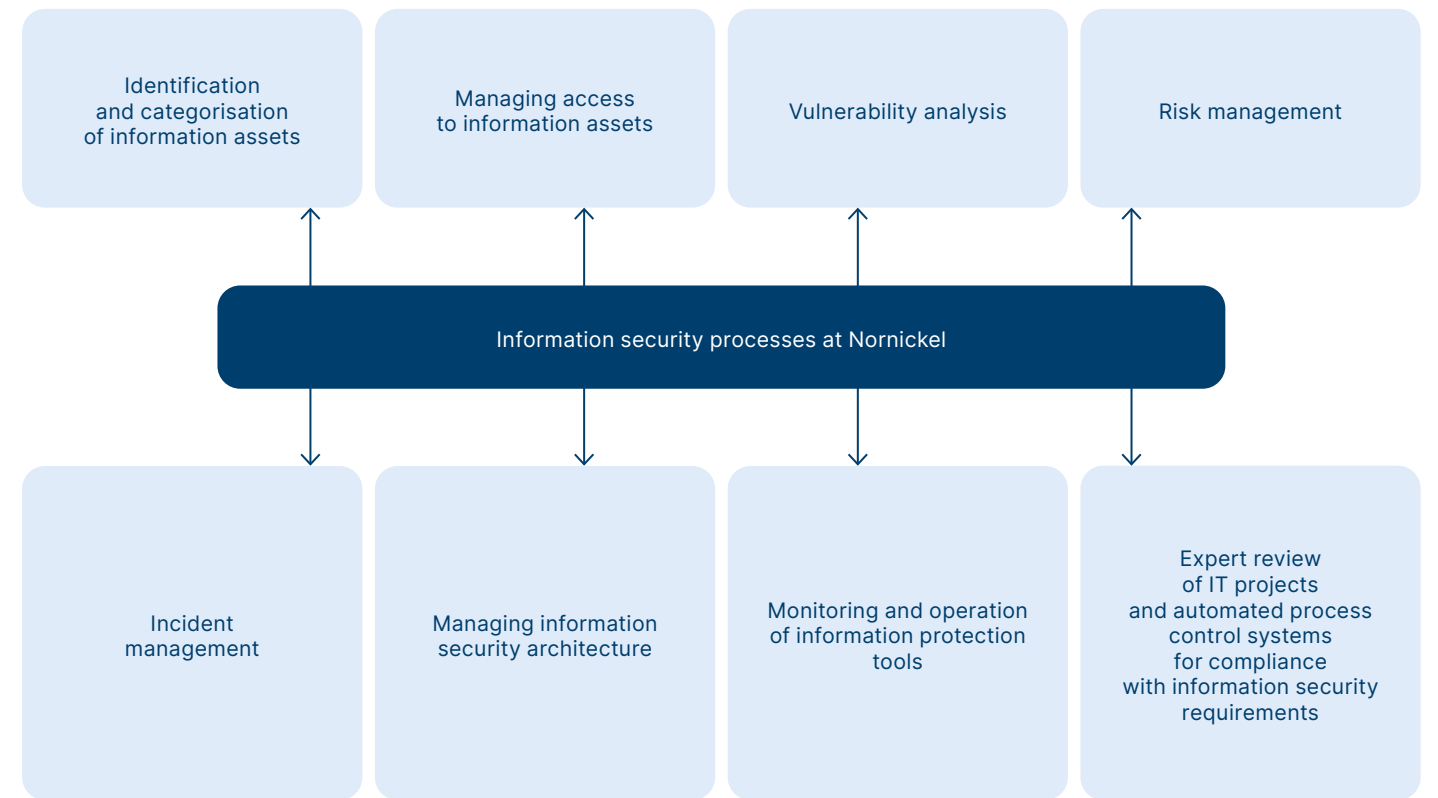
In 2023, the Company analysed existing external challenges and current trends in the Russian market to review its information security approach. Among other things, Nornickel reorganised its information security function, while also drafting and approving a strategy for its further development, which suggests continued pivot towards import substitution of information security solutions and transition to a service-based model.

Nornickel Sfera, the Company's subsidiary, possesses extensive technical competencies across core information and process security areas, and offers a full range of key services to the Group's facilities.

The Company takes consistent steps to protect the process infrastructure of its production sites and to mitigate risks. With cyber attacks increasingly numerous and sophisticated and some employees

continuing to work from home, additional measures are required to ensure the information security of corporate resources and infrastructure.

The Company has implemented all the necessary information security processes.



The operation of the Information Security Management System (ISMS) is governed by the Company's internal regulations (MMC Norilsk Nickel's Information Security Policy, information security guidelines and standards) in line with best global practices.

Nornickel's priority in ensuring the security of automated process control systems is implementing basic protection measures (tools and systems) at the greatest possible number of facilities and production sites equipped with automated process control systems. In the reporting year, the emphasis was placed on using domestic solutions.

The 2023 internal audit praised the information security function for its achievements in protecting automated control systems. The audit recommendations are expected to be implemented in 2024.

Cyber incidents are yet another focus area in the domain of information security. In order to deal with cyber incidents, the Company uses cutting-edge technical solutions, and keeps abreast of domestic and global cyber defence practices. Relevant procedures are regularly tested (at least once a quarter) to assess Nornickel's preparedness to respond to modern cyber attacks. Any employee who detects suspicious content or activity on corporate devices can report it to the information security function. Experts assess the possible negative impact on the Company's information systems and takes measures to prevent and eliminate the consequences of incidents.

New vulnerability management strategies were drafted and rolled out in the reporting year.

They seek to counter new types of attacks and provide for the continuous protection of the Company's systems, including by implementing the DevSecOps strategy focused on ensuring security throughout the software development lifecycle.

Personal data (including third party data) is protected in accordance with applicable Russian laws. The security experts employ a comprehensive range of organisational and technical tools, including anti-virus protection, prevention of information leaks, control of removable media, analysis of security events, and personnel training to raise awareness about compliance with personal data requirements. In 2023, personal data processing was aligned with the latest legal requirements and internal regulations.



Information security highlights for 2023

>6,000

audits conducted in response to information security grievances submitted by the Company's employees

>18,000

information security events handled



57

operated systems

underwent vulnerability analysis, with bottlenecks identified and remedies proposed

13

Group companies

aligned personal data processing with relevant legal requirements and internal regulations



ISO/IEC 27001:2013

Nornickel's Information Security Management System complies with ISO/IEC 27001:2013.

In 2023, five of Nornickel's sites confirmed the high efficiency of their information security management processes:

- Murmansk Transport Division;
- Kola Mining and Metallurgical Company (Kola Division);
- Nadezhda Metallurgical Plant (Norilsk Division);
- Copper Plant (Norilsk Division);
- Talnakh Concentrator (Norilsk Division).

The external auditor noted strong involvement of the management in the ISMS processes and preparedness of the facilities to respond to new threats and challenges.

A series of audits is planned for 2024 as part of transition to ISO/IEC 27001:2022.

Information security training

Raising employee awareness about data protection and digital hygiene is an important element of the information security management system pursuant to the Company's internal regulations¹. In 2023, Nornickel set a goal to enhance the culture of information security across the Group.

All new employees are familiarised with by-laws governing information security requirements and undergo additional induction training.

Every year the staff takes courses on the latest cyber threats and risks.

In 2023, there were about 95 scheduled and 19 unscheduled e-learning training sessions and on-site lectures for 34,104 Group employees.

Furthermore, the Company arranges regular drills dealing, among other things, with simulated phishing attacks and other user threats. The drill results are used to update employee instructions.

In addition, there are regular newsletters to inform the staff about current information security threats and digital hygiene rules.

34,104

Group employees

completed training sessions in 2023

Stakeholder engagement on information security

The Club of Information Security in Industry established at the initiative of Nornickel serves as a venue for sharing best practices and experiences in the realm of information security, and engaging in a public-private dialogue on relevant regulations. By the end of 2023, the Club had over 70

Russian companies as its members. The agenda covers the pressing issues of ensuring cyber security for businesses in the face of new challenges and threats.

In an attempt to give a boost to the information security market for the industrial sector, the Company held

meetings with developers and vendors of information security products and services, and entered into strategic partnership agreements with some of them.

¹ Rules of Raising Awareness in Information Security of MMC Norilsk Nickel.

RESPONSIBLE BUSINESS CONDUCT

Nornickel has traditionally been striving to strengthen its status as a responsible employer, a reliable supplier for Russian and foreign counterparts, and a partner for the regions of operation, local and indigenous communities. The Company sets the bar high for its employees and partners with respect to responsible business conduct, including string respect for human rights, zero tolerance to any form of corruption and all levels, counterparty screening in procurement, and roll-out of a responsible supply chain.



RESPECT FOR HUMAN RIGHTS

GRI 2-23/SASB EM-MM-210a.3

How has the Company's human rights agenda evolved over the past 20 years?

- The Company:
- does not tolerate any forms of discrimination;
 - does not use forced or child labour;
 - gives every employee equal opportunities to exercise their labour rights;
 - does not operate in areas involved in military conflicts and high-risk areas, nor procures mineral feedstock from such areas.

The Sustainable Social Development Strategy and the Environmental and Climate Change Strategy approved by the Board of Directors are closely linked to respect of human rights. The Company's strategic focus areas and relevant initiatives seek to provide comfortable working conditions, strengthen occupational health, offer opportunities for professional growth in line with the needs of the economy of the future, improve the quality of life for the Company's employees and local and indigenous communities, and foster a healthy environment.

The implementation of the strategy is closely related to achieving the UN Sustainable Development Goals and the objectives of Russia's national projects.

In 2023, Nornickel was included in the ranking of the World Benchmark Alliance, which confirms the Company's compliance with the Corporate Human Rights Benchmark (CHRB). Nornickel joined the world's 30 largest mining companies and became the only Russian company to significantly improve its rating in the mining sector. The Company ranked 28th out of 55 businesses in the mining industry.



Nornickel's commitment to human rights

Nornickel respects the rights of all people working in the Company, residing in the regions of its operation, and interacting with it throughout operational processes. Nornickel's human rights activities are governed by the Company's by-laws¹, including:

The document applies

- to protecting the rights of the Company's employees
- ▲ local communities
- employees of suppliers and contractors
- indigenous peoples

Business Ethics Code ○	Occupational Health and Safety Policy ○ ■	Community Engagement Policy ▲
Indigenous Peoples' Rights Policy ●	Human Rights Policy ○ ■ ▲ ●	Personal Data Processing Policy ○
Environmental Policy ○ ■ ▲ ●	Responsible Sourcing Policy ■	Equal Opportunities Programme ○
Freedom of Association Policy ○	Environmental Impact Assessment Policy ○ ■ ▲ ●	Supplier Code of Conduct ■
Working Conditions Policy ○ ■	Policy Regarding Support for Small and Medium Enterprises ▲	Stakeholder Engagement Policy ○ ■ ▲ ●

¹ Nornickel's by-laws are available on the [Company's official website](#).

In 2023, the Company approved an updated version of the Corporate Trust Line Procedure, worked to update the Stakeholder Engagement Policy and the Indigenous Peoples' Rights Policy, and drafted the Regulations to Carry

into Effect the Principles of Preventing, Reducing, and Mitigating Potential Impacts on Indigenous Minorities.

Human rights in the Company are respected in line with the applicable Russian laws, UN Guiding Principles

on Business and Human Rights, generally recognised standards, principles and recommendations, industry-specific initiatives, and international laws.

Top management is responsible for ensuring the respect of human rights in the Company. To engage executives into sustainable development management, in particular as regards human rights, occupational health and safety indicators linked to FIFR were included in the annual team KPIs

of the top management (relative weight of 30%). The most significant matters, such as remuneration, incentives, occupational health and safety or workplace injuries, are reviewed by the Board of Directors and relevant committees. The Company runs cross-functional initiatives to protect

human rights. For example, to achieve the strategic goal of zero workplace fatalities, the Company developed initiatives to enhance safety culture.

➔ For more details, please see the [Occupational Health and Safety](#) section.



Industry-specific initiatives

- Initiative for Responsible Mining Assurance (IRMA)
- Principles of the International Council on Mining and Metals (ICMM)

Russian legislation

- Constitution of the Russian Federation
- Labour Code of the Russian Federation
- Federal Law No. 82-FZ On the Minimum Wage dated 19 June 2000, Federal Law No. 82-FZ On Safeguarding the Rights of Indigenous Minorities of the Russian Federation dated 30 April 1999, and other federal laws



External human rights regulations and standards applied by Nornickel

Generally recognised international and Russian declarations, guidelines and initiatives

- UN Global Compact
- UN Universal Declaration of Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work
- International Labour Organisation conventions
- OECD Guidelines for Multinational Enterprises
- Social Charter of the Russian Business

Practical recommendations

- Guide for Integrating Human Rights into Business Management (UN Global Compact)
- Global Reporting Initiative, uniform reporting standards and recommendations (GRI)
- Voluntary Principles on Security and Human Rights (VPSHR)
- UN Guiding Principles on Business and Human Rights (UNGP)
- International Financial Corporation's (IFC) Environmental and Social Performance Standards

Respect for human rights across Nornickel's operations: approaches and key achievements

In 2023, the Company implemented an extensive range of activities and projects, including measures aimed at protecting the rights of the

- Company's employees
- employees of suppliers and contractors
- ▲ local communities
- indigenous peoples

Right to life, freedom, and privacy, freedom from arbitrary arrest, freedom of movement

Approaches and key achievements in 2023

- ■ 0 instances of child or forced labour in 2023;
- No restrictions imposed on employees' freedom of movement, provision of relocation assistance to employees in difficulty, and allocation of transportation subsidies to employees living beyond the Arctic Circle;
- ■ Protection of personal data and privacy of employees.
- ➔ For more details, please see the [Human Capital Development](#), [Occupational Health and Safety](#), and [Corporate Security](#) sections

Rights to the protection of family, maternity and childhood

Approaches and key achievements in 2023

- ■ Respect for the rights of mothers and pregnant women;
- Ensuring the necessary conditions for an employee to return to work from a maternity and/or childcare leave (in 2023, 623 employees returned to work after such leaves);
- Social (housing, healthcare and culture) programmes aiming to support families and provide them with leisure opportunities.
- ➔ For more details, please see the [Human Capital Development](#) section

Right to safety, including occupational health and safety

Approaches and key achievements in 2023

- ■ Continued commitment to zero tolerance towards workplace fatalities, development of a proactive risk-oriented approach aimed at preventing adverse events (implementation of unified cardinal safety rules, incentives for risk detection, etc.);
- ■ In 2023, health and safety expenses amounted to RUB 17.5 bn, or RUB 218,000 per employee.
- ➔ For more details, please see the [Occupational Health and Safety](#) section.

¹ For more details on the governance structure, responsibilities and oversight of human rights in the Company, please see the [2023 Human Rights Report](#).

Right to a reasonable work schedule and paid leave

Approaches and key achievements in 2023

- ■ The Company respects internal labour regulations, which are approved in consultation with the trade union organisation, and formalises employees' working hours;
- Employees are provided with paid job-protected annual basic and additional leaves.

→ For more details, please see the [Human Capital Development](#) section

Right to protection from discrimination

Approaches and key achievements in 2023

- ■ ▲ ● Zero tolerance towards discrimination on any grounds in the Company;
- ■ ▲ ● No reported cases of racial, gender, religious, political, social or other discrimination in 2023;
- ■ ▲ ● Development of social programmes to support diversity and inclusion (Norinickel's Youth Ecosystem, mentorship, etc.).

→ For more details, please see the [Human Capital Development](#) section

A requirement on counterparties to respect human rights as part of the supply chain responsibility commitments

Approaches and key achievements in 2023

- The supply chain due diligence management system seeks, among other things, to identify and mitigate various risks, including the risk of violating human rights and freedoms;
- Continued commitment to a zero tolerance approach towards any violations of human rights across the supply chain.

→ For more details, please see the [Supply Chain Responsibility](#) section

Right to freedom of association and collective bargaining

Approaches and key achievements in 2023

- 94.02% of employees are covered by collective agreements. The Group companies are parties to a total of 22 collective bargaining agreements;
- As at the end of 2023, 7.3% of the Company' employees were members of trade unions, while 76.5% were represented by social and labour councils.

→ For more details, please see the [Human Capital Development](#) section

Rights of local and indigenous communities

Approaches and key achievements in 2023

- ■ ▲ ● The Company has a wide range of programmes seeking to improve the living standards of local communities (for example, the World of New Opportunities with 15,000 participants and the Plant of Goodness with approximately 4,000 volunteers and 410 events);
- The Company respects the rights of indigenous peoples and seeks to improve their living standards. As part of interactions with the indigenous minorities, Norinickel abides by a number of agreements. In 2023, the Company allocated RUB 976 mln to finance projects for the indigenous northern minorities;

▲ ● The Company extends targeted support to educational institutions in the regions of its operation;

▲ ● The Company does not implement or plan to implement any business projects related to taking land from the population and forced relocation.

→ For more details, please see the [Development of Local Communities](#) section

Right to work, fair and adequate remuneration, favourable working conditions, and social security

Approaches and key achievements in 2023

- The average salary paid to Norinickel's employees is well above Russia's average, standing at RUB 184,100 per month (2023);
- The Company offers its employees a wide range of benefits and social assistance programmes (in 2023, the compensation package across the Group came in at RUB 196,800 per month, with the social assistance package accounting for 6% of this amount);
- The Company launched a new Digital Investor corporate programme seeking to provide participants with additional income sources (over 51,300 participants);

○ Norinickel put in place an updated version of the Made with Care employee comfort programme (in 2023, 138 facilities underwent repairs, with RUB 4.5 bn allocated to improve social and working conditions);

○ The Company takes steps to secure jobs for vulnerable population groups and people with disabilities;

○ The Company ensures equitable access to education for all categories of employees by offering them a wide range of training programmes;

○ In 2023, the average annual number of training hours per employee (based on average headcount) was 88, with the Company spending an average of RUB 16,820 per employee;

○ In 2023, the Company continued running the Our Home / My Home and Your Home housing programmes (since the start of the programmes, 6,118 apartments have been provided to employees).

→ For more details, please see the [Human Capital Development](#) section

Right to a healthy environment

Approaches and key achievements in 2023

○ ■ ▲ ● The Company continuously works to reduce its environmental footprint and implements a comprehensive environmental policy. In 2023, the Environmental and Climate Change Strategy was updated, and key focus areas of the Carbon Neutrality Strategy were identified;

○ ■ ▲ ● As part of the Sulphur Programme, SO₂ emissions in Kola Division have gone down by 90% since 2015; in 2023, the first stage of the Programme was launched at Nadezhda Metallurgical Plant;

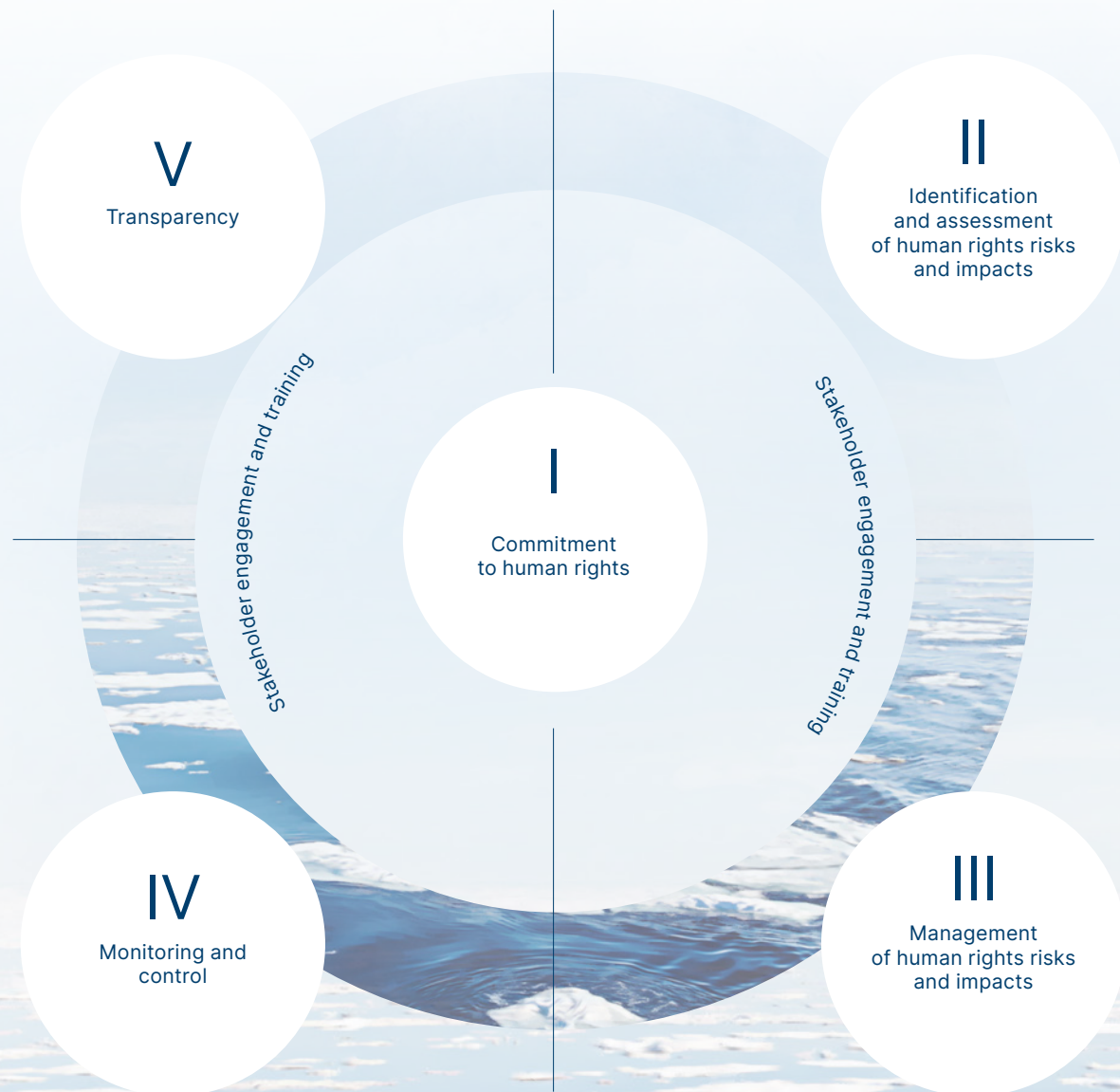
○ ■ ▲ ● In 2023, the Company continued to implement the air quality monitoring and forecasting system in Norilsk and Monchegorsk.

→ For more details, please see the [Environmental Protection](#) section



Human rights due diligence

In 2022, Nornickel started taking consistent steps to develop and implement the Human Rights Due Diligence System at all of its facilities in accordance with applicable international standards.



In 2023, the Company stepped up efforts to develop and put in place due diligence procedures, with an in-depth analysis run to identify and assess risks of human right violations by employees with a breakdown by operations.

The analysis helped map out top-priority human rights, including the right to health, safe working conditions, protection from forced labour, and fair and adequate remuneration. Identified social risks, which might be potentially associated with human right violations, have a significant impact on the Company's corporate risks.

➔ For more details, please see the [Internal Control and Risk Management](#) section.

As part of the annual survey "Let Everyone Be Heard. What Do You Think?", the Company monitors social satisfaction across its operations. Career opportunities, respect of health rights, favourable working conditions, and fair remuneration are among the survey's key focus areas.

The survey results are discussed in focus groups at the Company's production sites, after which an action plan and a communication campaign for the Company's employees are developed.

➔ For more details, please see the [2023 Human Rights Report](#)

For assessing risks of human right violations, Nornickel uses an engagement questionnaire, an important tool for monitoring and controlling progress against the Company's social policy and initiatives to prevent risks of social tensions.

To identify and mitigate risks in the supply chain, the Group put in place a mineral supply chain due diligence management system.

The Company operates a Corporate Trust Line available to both Nornickel's employees and external stakeholders, including local and northern indigenous communities, as well as contractors' employees.

➔ For more details, please see the [Grievance Policy](#) section.

Training

Human rights are integrated into training programmes on critical competencies (digital skills, occupational health and safety, sustainable development) completed by more than 51,000 employees in 2023.

All of the Company's employees, including the security personnel, are required to review MMC Norilsk Nickel's Human Rights Policy, after which they become

subject to the applicable provisions of the Policy. Personnel of the Corporate Security Unit and third-party security providers undergoes specialised training. All security employees are obliged to complete professional training programmes developed by relevant federal executive authorities for private security officers and pass a qualification exam. The programmes cover such topics as lawful use of physical force or weapons, medical assistance, psychological training, life and health protection, etc. Subsequently, employees of security organisations are subject to annual checks. Nornickel's security units organise training sessions and drills for security officers. In 2023, 710 training sessions were held for security employees.

➔ For more details, please see the [2023 Human Rights Report](#).

>51,000
employees
completed training programmes
on critical competencies
in 2023

710
training sessions
held for security employees
in 2023



GRIEVANCE POLICY

GRI 2-16, 2-25, 2-26, 207-2

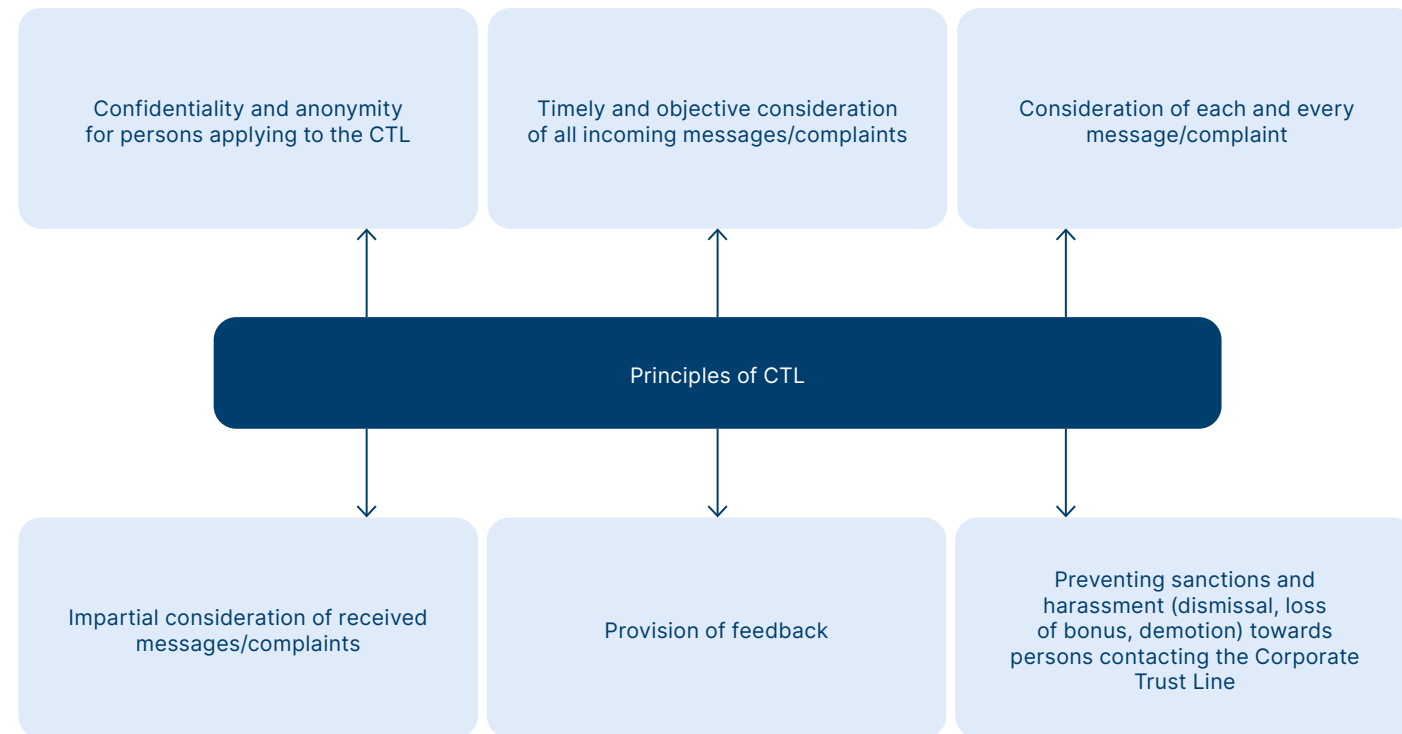
Over the past 20 years, the process of considering messages and complaints at Nornickel has become more systematic, transparent, and accessible to a wider audience. Grievance policy is seen as an important element in building communication, collecting feedback, ensuring human rights and freedoms, and increasing trust. The Company provides stakeholders with a variety of channels, including online forms, email, hotline, programmes, and feedback mechanisms that allow for prompt response to reported concerns and corrective actions.

Corporate Trust Line

In 2010, Nornickel set up its Corporate Trust Line ("CTL"). It is the first port of call for receiving and processing messages and complaints from the Company's stakeholders regarding negative impacts on stakeholders

as a result of the activities of the Company / Russian business units, human rights violations, or other situations relating to the activities of the Company / Russian business units and causing reasonable concern

of stakeholders, as well as information on the protection of assets and corporate interests, prevention of abuse, theft, and other violations. The CTL geography covers all business units of the Company and the Group's facilities.



The service is governed by the Procedure on the Corporate Trust Line, which was updated in 2023 to include the following provisions:

- applicants are provided with a confirmation of message/complaint registration (including information on standard consideration time) and a decision to take up their message/complaint (if contact details are available);
- independent experts are engaged to review the grievance and develop corrective actions;
- reported and reporting employees of the Company, as well as applicants who are not employed by the Company, may be subject to an enquiry (provided they have given their consent);
- applicants can fill in a feedback form to give their opinion on the consideration and settlement of a complaint (evaluation of the applicant's satisfaction);
- the Company has the right to publish anonymised information on the subject of complaints and the results of their consideration.

The CTL activities fall within the remit of the Internal Control Department. Officers responsible for the CTL are its operators and head along with the Director of the Internal Control Department. Having received a request from the Corporate Trust Line, the Company's business units verify incoming information, take corrective actions, and send the control results back to the CTL. Starting from 2023, the Sustainable Development Department was made responsible for working with independent experts to review messages/complaints and take relevant mediation effort (if requested by the applicant)¹.

The head of the Corporate Trust Line reports to heads of business units and members of the Audit Committee on the service's performance, including statistics on messages/complaints broken down by Group company and subject matter of messages/complaints.

CTL is subject to assessment by the Vice President for Internal Control and Risk Management, the Board's Audit Committee and employees taking part in an engagement survey named "Let Everyone Be Heard. What Do You Think?" (containing two questions about the work of the CTL).

Persons in charge of the CTL have individual KPIs such as timely and proper processing of incoming communications and reporting on CTL performance to interested users.

Any interested party can contact the Corporate Trust Line to make enquiries on a wider range of issues.

Toll-free 24/7 channels to receive messages/complaints:

Tel.: 8-800-700-19-41 and 8-800-700-19-45;

email: skd@nornik.ru;

online form at <https://www.nornickel.com/sustainability/corporate-hotline/>;

Supernika mobile app (for the Company's employees).

Messages and complaints can also be sent to the Corporate Trust Line of MMC Norilsk Nickel at 15, 1st Krasnogvardeysky Drive, Moscow, 123100, Russia.

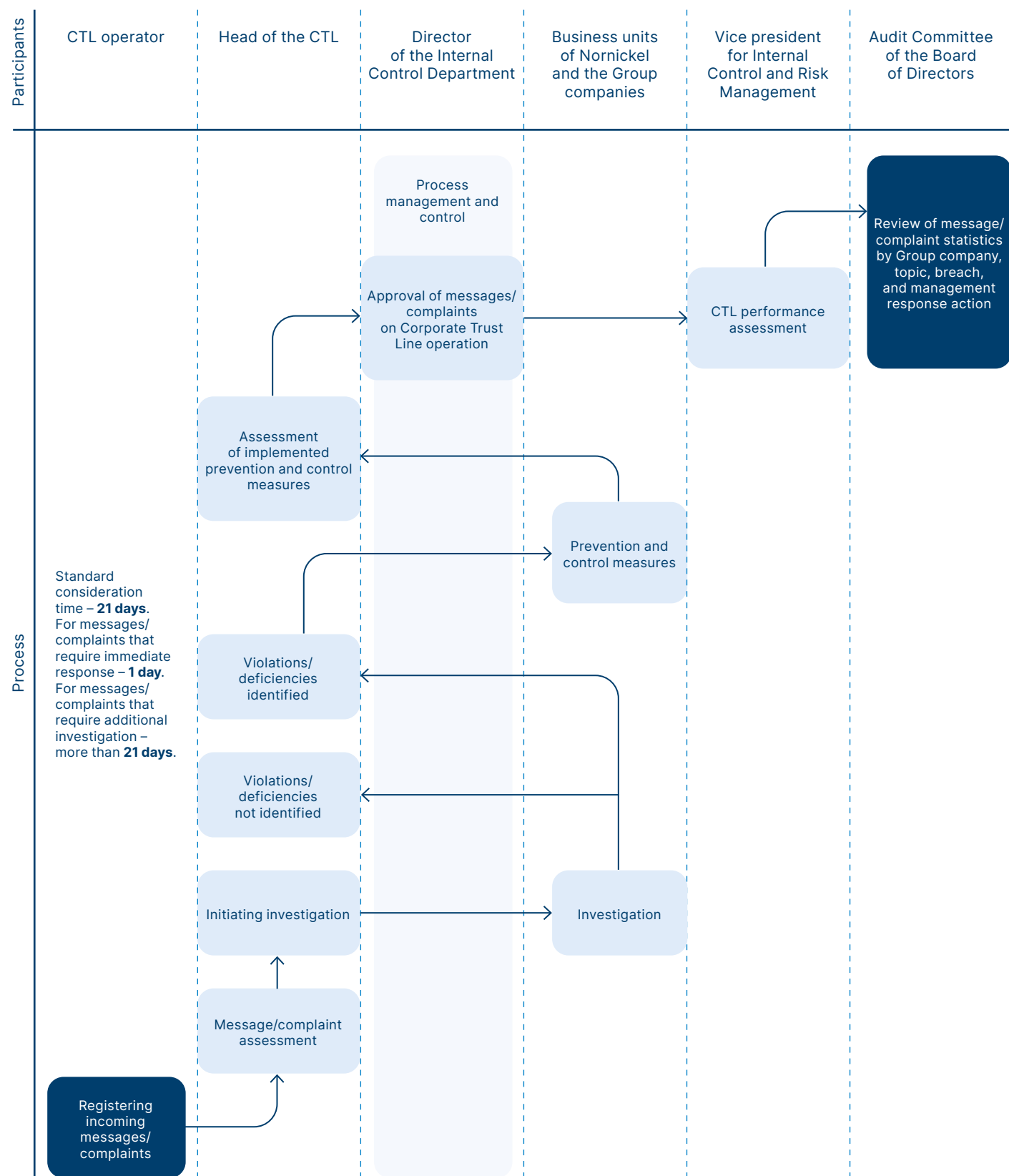
The standard consideration time from the registration of the message/complaint by the service operator to the review of the information received by the head of the service is 21 business days. Exceptions are made for messages/complaints that require immediate action or additional investigation.

If the message/complaint 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.

21 business day standard consideration time from the registration of the message/complaint by the service operator to the review of the information by the head of the service

¹ In 2023, independent experts were not engaged.

Framework for registering and reviewing messages/complaints by the Corporate Trust Line



In 2023, the Corporate Trust Line received

2,079 reports

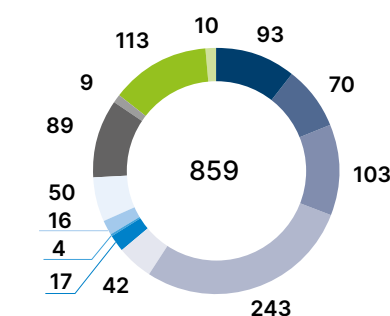
Information about the Corporate Trust Line is posted on the Company's intranet site and its official webpage and distributed to employees through information displays, stands, posters, and payslips.

In 2023, the Corporate Trust Line received 2,079 messages/complaints, with 859 accepted for review, 816 resolved and released from control (out of which 193 were confirmed and 623 not confirmed). The largest number of messages/complaints related to labour relations, responsible sourcing, and HSE. Corrective actions were taken for all identified deficiencies, including providing employees with the necessary personal protective equipment (PPE) and tools, repairing premises and equipment, preparing documents for payment of allowances and bonuses, amending job descriptions and work instructions, handling claims with counterparties, applying sanctions for non-compliance with contract terms, and other decisions.

As at 1 January 2023 and 31 December 2023, 103 and 146 messages/complaints were at the processing stage, respectively.

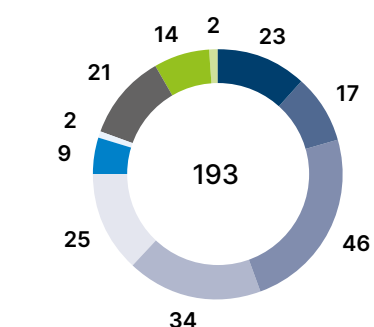
In 2023, eight applicants provided feedback on the review and settlement of their messages/complaints, with 87.5% giving a positive assessment of working with the Corporate Trust Line.

Messages/complaints received in 2023



- Payroll abuses
- Production-related abuses
- Technology, health and safety abuses (excluding environment)
- Labour relations
- Commercial and contractual activities
- Conflict of interest (pre-conflict situation)
- Corruption
- Theft
- Social issues
- Ethics
- Human rights and freedoms
- Responsible sourcing
- Corporate fraud

Messages/complaints confirmed in 2023



- Payroll abuses
- Production-related abuses
- Technology, health and safety abuses (excluding environment)
- Labour relations
- Commercial and contractual activities
- Conflict of interest (pre-conflict situation)
- Social issues
- Ethics
- Responsible sourcing
- Corporate fraud

In addition, in the reporting year, all incoming messages/complaints were systematised and classified in the context of human rights violations. In the short term, it is planned that the information obtained from the systematisation of messages/complaints

will be used by the Sustainable Development Department as part of human rights risk management.

➔ For more details, please see the [2023 Human Rights Report](#)

« Mutual understanding and trust are of paramount importance for effective teamwork. I appreciate that the Company's employees have an opportunity to contact the employer (either personally or anonymously) on a wide range of professional issues. Effective feedback helps resolve many problems. Not long ago, my colleagues and I, for example, drew our management's attention to the quality of workwear. We were heard and offered new PPE. I like that the dialogue between employees and the management is becoming increasingly more constructive over time

Andrey Shchetinin,

converter operator, grade 6, Nadezhda Metallurgical Plant, Polar Division of MMC Norilsk Nickel (length of service at the Company — 35 years)

Grievance mechanism

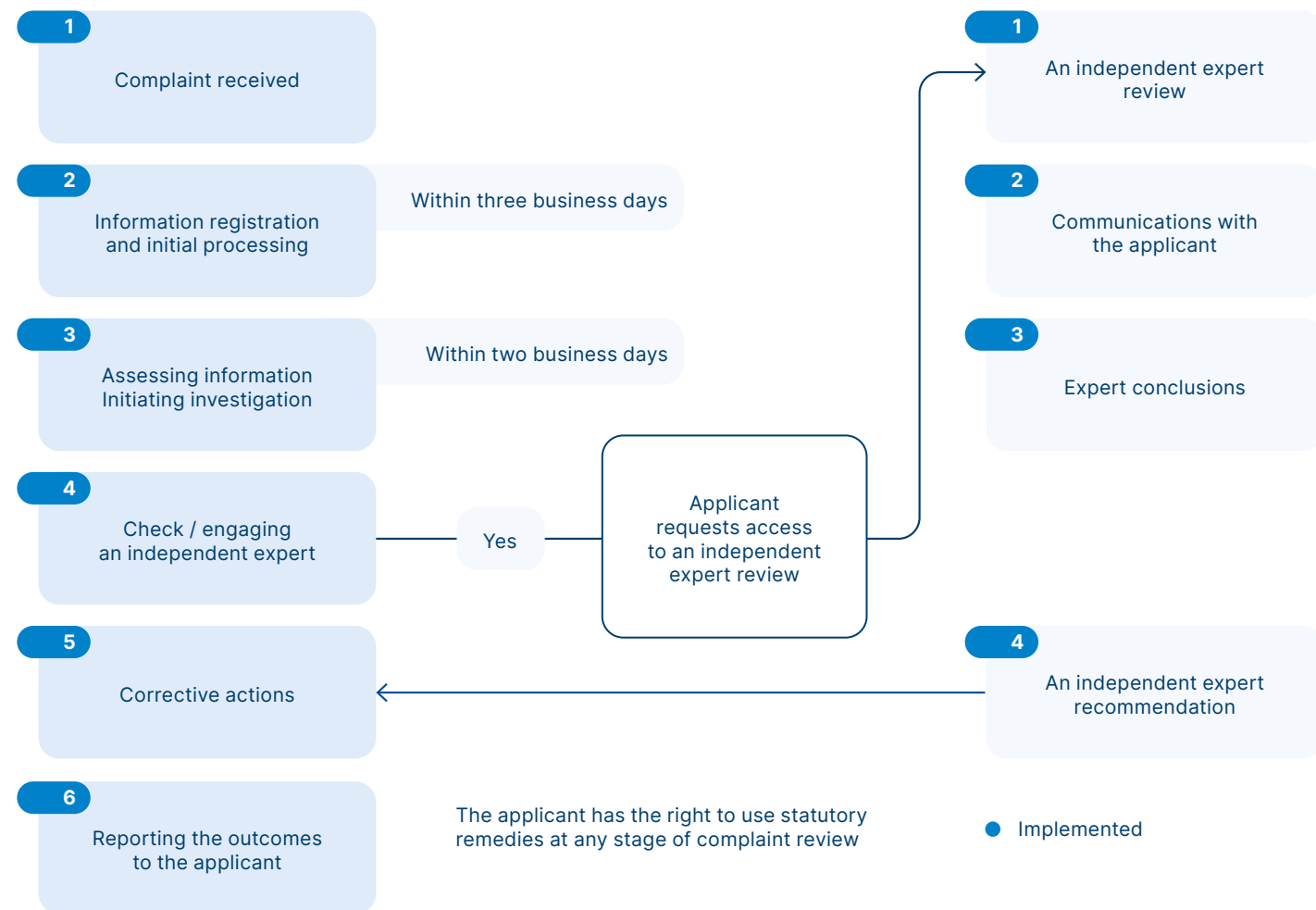
The grievance mechanism (the “Mechanism”) is a corporate procedure with a focus on:

- receipt, review, and management of grievances on adverse impacts from the Company’s operations;
- early prevention, identification, and elimination of human rights risks;

- pre-trial dispute resolution¹ based on dialogue and mediation.
- support of continuous improvements in the Company’s operations in order to strengthen the relationships between the Company and its stakeholders in the long run.

The Mechanism is geared primarily towards external stakeholders (residents in the regions of operation, suppliers and contractors, indigenous minority communities, etc.). The Mechanism does not replace any existing statutory or corporate rights protection mechanisms.

Grievance process flow



¹ The Mechanism is not intended to address any pre-existing social, economic, or cultural issues affecting local communities across the Company’s operations. The Company continues to resolve them using other mechanisms and social programmes.

Complaints are filed through CTL channels, community liaison offices, and managers of the Company and the Group companies. A complaint may be submitted by the initiator or with the help of company representatives and independent experts in case of any difficulties.

Upon receipt of the complaint, the relevant business unit of the Company is made responsible for checking incoming information, deciding on the need to procure additional information, and whether an independent expert group is required or the complaint shall be redirected to state authorities. This means that the grievance mechanism has three levels such as internal, independent (expert), and government.

In 2023, the Corporate Trust Line Procedure was updated to include regulations on cooperation with independent experts.

To monitor the performance of the mechanism, we collect feedback from complaint initiators and assess the level of satisfaction on an ongoing basis and annually by analysing the feedback received during consultations with stakeholders across the Company’s footprint and at the Head Office. The Corporate Trust Line remains the main grievance mechanism.

The development of the grievance mechanism is one of the steps to improve the 2023 Human Rights Due Diligence System (for more details, please see the [2023 Human Rights Report](#)).

¹ If more time is needed for review and resolution, the initiator is notified to this effect within 30 days.

Standard consideration time¹

21 business days
if a complaint was filed through CTL channels

30 calendar days
if a complaint was filed through community liaison offices or by addressing the Company’s executives, etc.

Grievance mechanism: indigenous peoples

In accordance with the [Indigenous Peoples’ Rights Policy of PJSC MMC Norilsk Nickel](#), the Company provides indigenous peoples with a mechanism for submitting anonymous or public grievances related to the Company’s operations. Once reviewed, these grievances are subject to settlement or serve as a basis for legal protection.

