

# GRIEVANCE POLICY

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

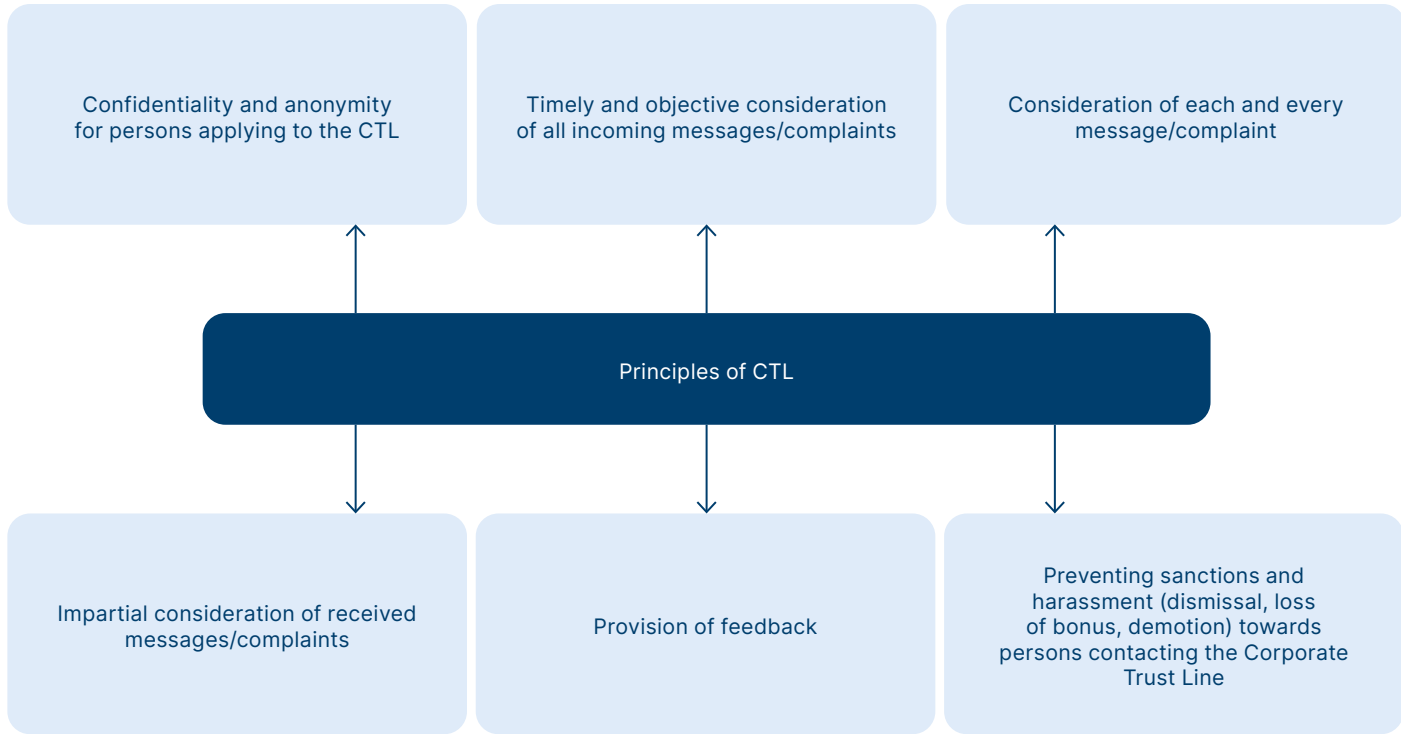
Over the past 20 years, the process of considering messages and complaints at Nornickel has become more systematic, transparent, and accessible to a wider audience. Grievance policy is seen as an important element in building communication, collecting feedback, ensuring human rights and freedoms, and 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)<sup>1</sup>.






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](mailto: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.

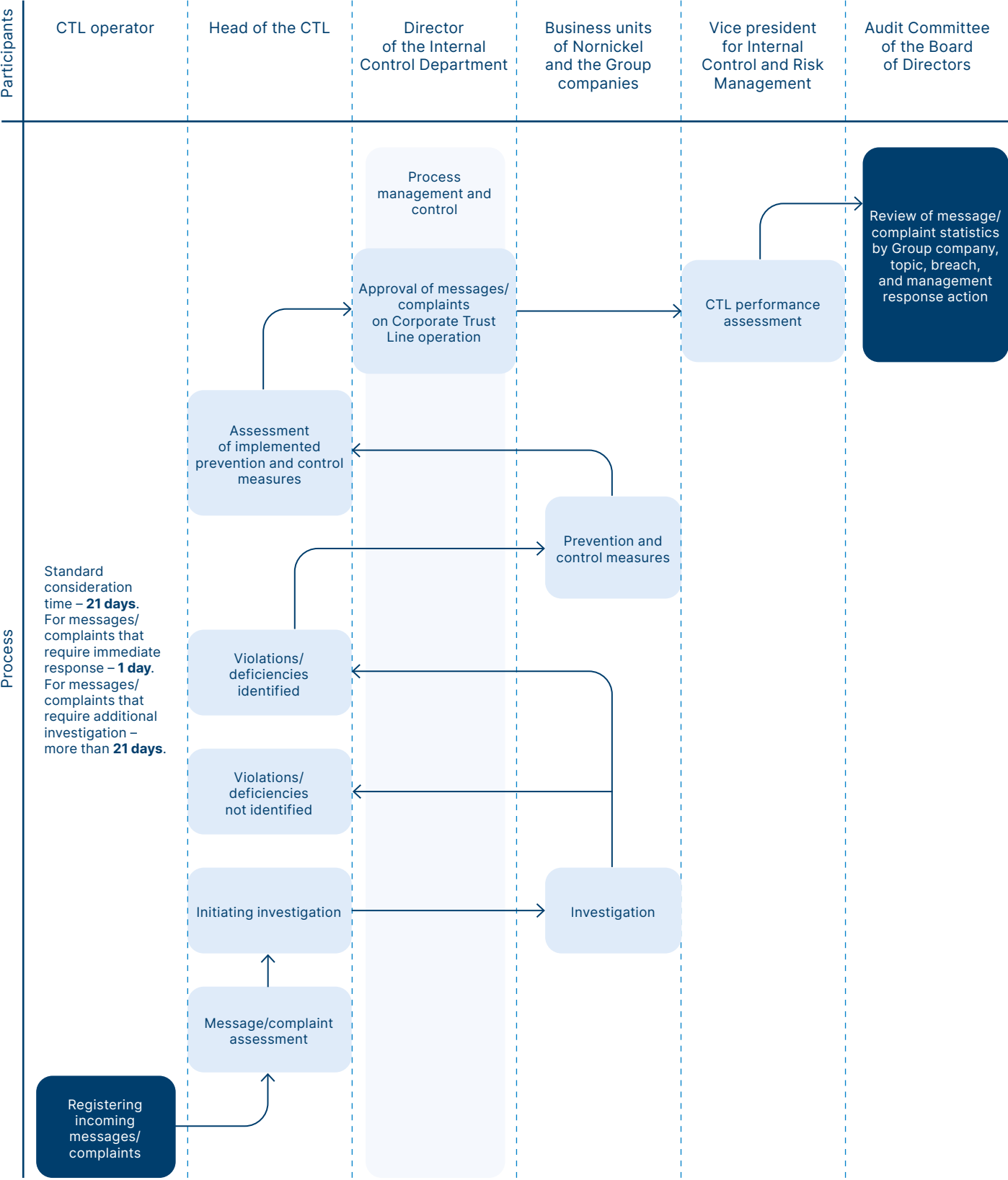
The standard consideration time from the registration of the message/complaint by the service operator to the review of the information received by the head of the service is 21 business days. Exceptions are made for messages/complaints that require immediate action or additional investigation.

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

<sup>1</sup> 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

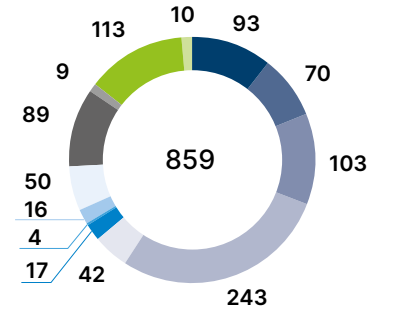
Information about the Corporate Trust Line is posted on the Company's intranet site and its official webpage and distributed to employees through information displays, stands, posters, and payslips.

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.

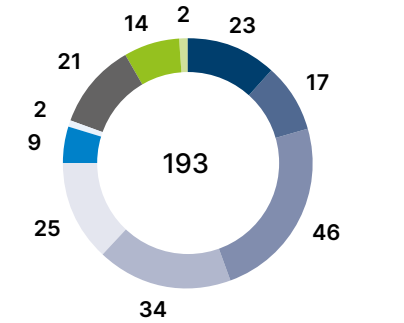
Messages/complaints received in 2023



- 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

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

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)
- Corruption
- Theft
- Social issues
- Ethics
- Human rights and freedoms
- Responsible sourcing
- Corporate fraud

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 resolution<sup>1</sup> 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.

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](#)).

Standard consideration time<sup>1</sup>

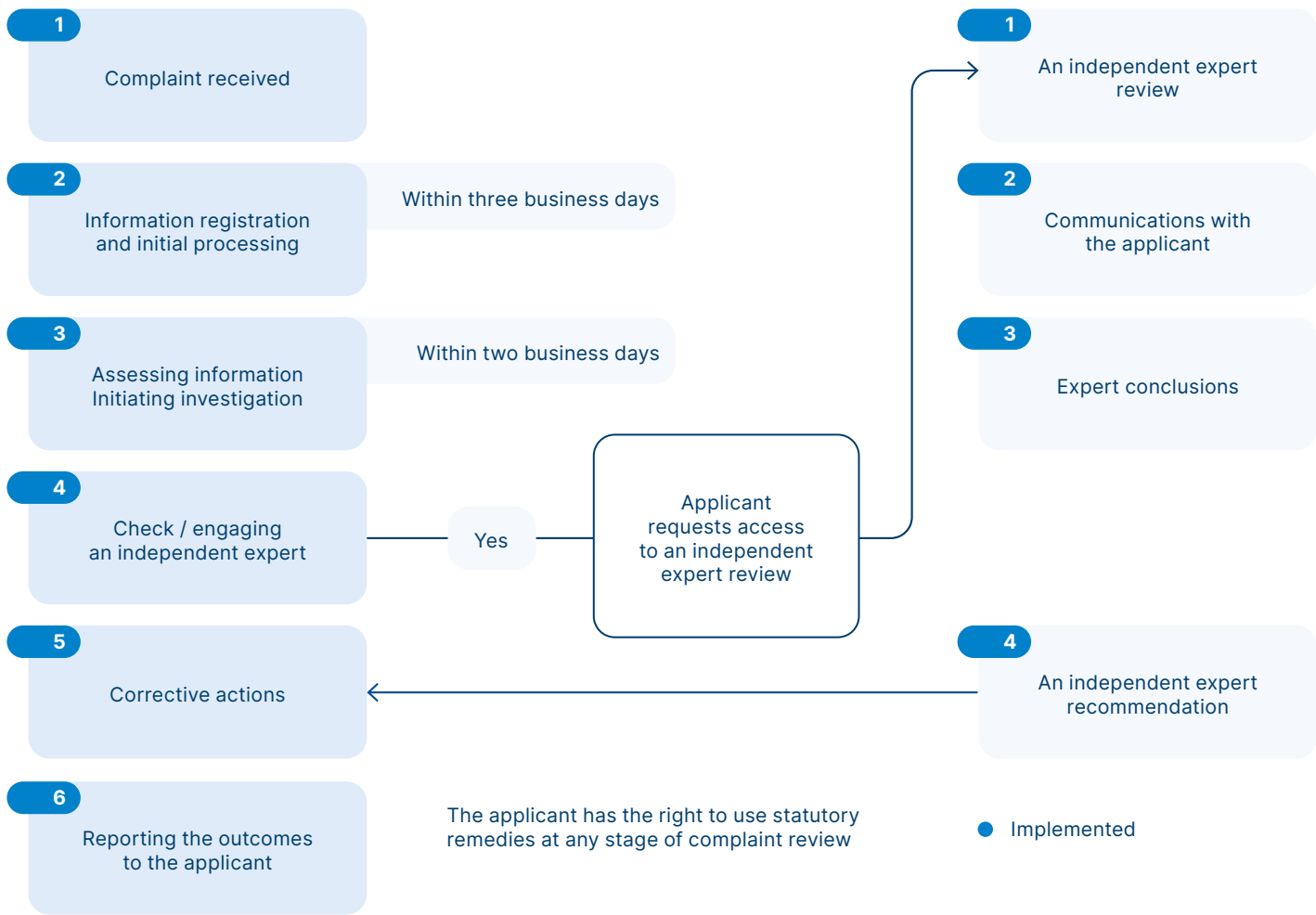
**21 business days**

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 process flow



<sup>1</sup> 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.

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

## 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.

