



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

## **Human Rights Policy**

### **Objective**

PJSC "MMC "Norilsk Nickel" (the "Company" or "Nornickel") respects human rights and freedoms, in their entirety, in accordance with international law and the Constitution of the Russian Federation. This Policy outlines the key principles underlying the Company's approach to the protection of human rights, as well as guarantees to the effect that these rights will be respected across the Company's operations. Nornickel takes appropriate company-wide measures to prevent and remedy violations of human rights whenever such violations are identified.

This Policy should be read in conjunction with the [Code of Business Conduct](#), the [Equal Opportunities Programme](#), the [Working Conditions Policy](#) and other related by-laws of the Company.

### **Scope**

This Policy covers all stages and processes throughout the production cycle, including exploration, production, concentration, refining, end products, marketing and sales of non-ferrous and precious metals, as well as the shutdown of operations and various production units, and applies to all divisions across the Company's footprint. The Company acknowledges that governments, within their jurisdiction, are required to protect human rights, and cooperates with government agencies in this matter.

The Company applies the principles of the Human Rights Policy to all stakeholders, including:

- Company employees;
- supplier and contractor employees;
- government and private contractors;
- local communities across the Company's geographic reach;

- other persons and groups of persons affected by the Company's operations or products.

### **General information**

Respect for human rights is one of the fundamental principles of Nor Nickel's operations, as also reflected in the Code of Business Conduct of the Company. These principles are an integral part of the Company's by-laws governing the HR, environmental and social matters.

The Company acknowledges that businesses play an important role in human rights protection. By pursuing its business objectives, Nor Nickel also contributes to the economic growth of the regions where it operates and to improving the quality of life in local communities.

### **Regulatory framework**

The Company complies with the laws of the Russian Federation and other countries of its presence and respects international human rights protection and labour standards set out in the *International Bill of Human Rights*, the *International Labour Organisation Declaration on Fundamental Principles and Rights at Work* and the *UN Guiding Principles on Business and Human Rights*.

The Company is a party to the UN Global Compact.

The Company's by-laws comply with international human rights protection standards and principles. The Company treats its employees in a manner that respects and promotes human rights and freedoms. The Code of Business Conduct of the Company sets rules against any form of discrimination and forced labour, giving every employee an equal opportunity to exercise their labour rights regardless of gender, race, nationality, origin, financial, social and occupational status, age, domicile, religion, political beliefs and other circumstances not related to professional qualities, and reflects the Company's commitment to a consistent approach to solving socially significant issues in all regions of the Company's presence.

### **Responsibility**

This Policy was approved by the Company's Board of Directors and is subject to periodic review to ensure compliance with international human rights protection standards, as well as Russian and international laws and regulations.

The Company's President is responsible for ensuring that Nor Nickel respects human rights and complies with this Policy.

The Company's management on all levels is committed to respecting human rights and complying with the Russian and international laws and internal regulations governing human rights policies. In addition, the Company has a clear management structure and escalation and reporting lines.

### **Commitments**

Nor Nickel seeks to prevent any violations of human rights by putting in place effective management mechanisms and controlling the adequacy of decision-making processes.

The Company has made a number of key commitments:

#### Communications

- Communicate the Human Rights Policy to all stakeholders, including employees and contractors
- Communicate and engage with those affected by the Company's operations
- Build contractual relations with other businesses and government agencies across the Company's footprint subject to the principles of human rights protection
- Maintain an ongoing dialogue with stakeholders taking into account their views on human rights
- Inform all stakeholders about the Corporate Trust Service as a mechanism for reporting any human rights violations

#### Analysis and Assessment

- Assess, on a regular basis, the potential impacts of the Company's operations on human rights

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- Embed a comprehensive human rights review, including impact assessment, into business processes
- Interact with stakeholders as impacts are assessed and violations are corrected

### Control

- Exercise control, on a regular basis, in order to prevent potential violations of human rights in the Company
- Monitor legislative developments across the Company's locations, as well as changes in international human rights protection standards

### Correction and Improvement

- Cooperate with public and law-enforcement authorities in addressing human rights
- Review, in a timely and unbiased manner, all reports received by the Corporate Trust Service
- Eliminate human rights violations
- Implement and maintain initiatives designed to create safe and favourable working conditions
- Improve human rights standards and practices to protect victims of human rights violations

### Reporting

- The Company publishes updated information about its commitment to the protection of human rights in accordance with the generally recognized international principles and laws across the Company's locations in its corporate social responsibility and annual reports

### Updating

- Update this Policy on a regular basis in accordance with the Russian and international human rights standards

### **Initiatives**

## **Human Rights Policy of MMC Norilsk Nickel**

The Company discloses information about its social partnership projects, human capital development and socially focused programmes as well as other human rights initiatives in its corporate social responsibility and annual reports.

Nornickel's Corporate Trust Service collects information about all human rights violations. The Company guarantees anonymity to all those who report to the Corporate Trust Service.