



APPROVED
by resolution of the Board of Directors
of PJSC MMC Norilsk Nickel
passed on February, 2, 2018 No.GMK/3-pr-sd

Environmental Impact Assessment Policy of PJSC MMC Norilsk Nickel

Objective

PJSC MMC Norilsk Nickel (the “Company” or “Nornickel”) is committed to mitigating its environmental impact and fostering sustainable development of regions across the Company’s footprint by ensuring sustainable use of natural resources, implementing environmental initiatives, and assessing its environmental and social impacts throughout the entire life cycle of its projects, from feasibility studies to production.

This Policy defines key elements of the Company’s integrated approach to environmental impact assessment with a view to maintaining favourable environmental conditions and a comfortable living environment for local communities and the Company’s employees.

This Policy should be read in conjunction with the Environmental Policy, Biodiversity Policy and other by-laws of the Company.

Scope

This Policy covers the Company’s environmental impact assessment carried out as part of feasibility studies, designing, construction, reconstruction, modernisation and operation at all stages of the production cycle, including exploration, production, enrichment, refining, production of end products, as well as the shutdown of mining facilities and production units in all divisions across the Company’s footprint. 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.

General information

The Company complies with applicable Russian and international laws, as well as the contracts and agreements with federal and local government authorities pertaining to social and environmental impact assessment. Nornickel seeks to mitigate its environmental impact and improve the quality of life of its employees and communities across its footprint.

Responsibility

The Company's President is in charge of this Policy. This Policy was approved by the Company's Board of Directors and is subject to periodic review to ensure compliance with Russian and international social and environmental impact assessment laws and regulations.

Commitments

Nornickel's environmental impact assessment is a tool to prevent or mitigate its environmental impact and associated social and economic effects. The Company is committed to interacting with its stakeholders and improving the quality of life of its employees and communities across the regions where it operates.

The life cycle of a production asset includes the feasibility study, designing, operation, and decommissioning following the depletion of resources. Environmental impact assessment (EIA) conducted as part of project designing is prescribed by Russian laws. It is required to prove that the project complies with all applicable laws and regulations. EIA is carried out in order to analyse environmental and social effects and forecast the impact of the Company's future operations if the project is implemented.

The Company has defined key commitments pertaining to project feasibility study and designing stages:

Feasibility study stage: analysis and assessment

- engineering and environmental surveys, which are a set of studies of natural environmental components, along studies of social and cultural environments near the potential site;
- assessment of as-is condition of natural environment components near the potential site;
- forecast of potential adverse environmental impact that may arise during the facilities construction and operation.

Feasibility study stage: assessment tools

- laboratory study of natural environment components;
- research to assess radiation safety;
- engineering surveys;
- study of physical impacts on the facility;
- comprehensive sanitary and epidemiological studies;
- analysis of demographic and social indicators, as well as geographic and climate conditions.

Designing stage: analysis and assessment

- development of the EIA programme;
- study of technological, technical, social, environmental and economic indicators of proposed design solutions;

- assessment of the resource potential of the project's territory and its environmental setting;
- review of alternative options for implementing the Company's construction or production projects;
- assessment of the scope and duration of the project's potential environmental impact;
- development of measures to monitor the project's environmental impact (where needed);
- development of steps and measures to mitigate environmental impact (where needed).

Stakeholder engagement

- building and maintaining an open dialogue with federal and local government authorities and NGOs based on mutual respect of interests and compliance with laws and regulations;
- initiating public discussions in the regions of potential future operations (as required).

Monitoring

- implementing the environmental monitoring and industrial control programme;
- implementing a programme for environmental monitoring at the Company's waste disposal facilities to assess their environmental impact;
- regular monitoring of air quality along the borders of sanitary protection zones;
- monitoring the condition of water bodies;
- monitoring changes in legislation and updating this Policy to ensure compliance with the laws of Russia and other countries where the Company operates.

Reporting

- providing data on the results of environmental monitoring and industrial control to government agencies;
- filing state statistics reports on environmental protection to government agencies;
- annually disclosing information on the progress towards goals, objectives, and completed environmental initiatives in corporate social responsibility and annual reports;
- filing reports on completed environmental initiatives to government agencies.