

### **List of Insider Information of PJSC MMC Norilsk Nickel (the "List")**

The Insider Information of PJSC MMC Norilsk Nickel as the issuer includes:

1. Information on convening and holding the General Meeting of Shareholders of the issuer, on declaring the General Meeting of Shareholders of the issuer void, as well as on the resolutions adopted by the General Meeting of Shareholders of the issuer or the party owning all the voting shares of the issuer.
2. Information on holding the Meeting of the issuer's Board of Directors and its agenda, as well as on specific resolutions adopted by the issuer's Board of Directors:
  - on the proposal for the General Meeting of Shareholders of the issuer to establish a particular date in the resolution on the payment (declaration) of dividends as of which the persons eligible to receive the dividends shall be determined;
  - on the placement and conversion of the issuer's securities;
  - on the determination or the procedure for determining the price for the placement of the issuer's shares or securities convertible into shares;
  - on the formation of the executive body of the issuer and the early termination (suspension) of its authority, including the authority of the managing organization or the manager;
  - on the inclusion of candidates in the list of the candidates for voting at the Annual General Meeting of Shareholders of the issuer on the issue of electing members to the Board of Directors of the issuer;
  - on recommendations in respect of the amount of dividends for the issuer's shares and the procedure for their payment;
  - on the approval of the issuer's internal documents;
  - on the consent to make a transaction, or on the subsequent approval of a transaction (or several related transactions) of the issuer, recognized as a major transaction and/or an interested party transaction in accordance with the laws of the Russian Federation, as well as another transaction (or several related transactions) the amount of which is 10 percent or more of the book value of the issuer's assets according to the data from the issuer's accounting (financial) statements as of the last reporting date (the closing date of the last completed reporting period determined in accordance with subclause 26 of clause 1, Article 2 of the Federal Law On Securities Market, preceding the date of adoption of the resolution on the consent to make the transaction, or the date of the transaction, if the resolution is adopted on its subsequent approval);
  - on the transfer of the authority of the issuer's Sole Executive Body to the managing organization or the manager, on the approval of the managing organization or the manager and the terms and conditions of the contract to be concluded by and between the issuer and the managing organization or the manager;
  - on the approval of the registrar to maintain the issuer's Share Register, the terms and conditions of the contract to be concluded with the registrar, in so far as it relates to the maintenance of the issuer's Share Register, as well as on termination of the contract with the registrar.

3. Information on the adoption of a resolution on the reorganization or liquidation of the security provider for the issuer's bonds.

4. Information on signs of bankruptcy of the issuer or the security provider for the issuer's bonds as provided for by Federal Law No. 127-FZ dated October 26, 2002 On Insolvency (Bankruptcy).

5. Information on the acceptance by the arbitration court of a bankruptcy petition in relation to the issuer, as well as on a ruling by the arbitration court to recognize the insolvency (bankruptcy) of the issuer, implementation of bankruptcy proceedings against the issuer, or the termination of bankruptcy proceedings against the issuer.

6. Information on the date as of which the persons eligible to exercise the rights attached to the issuer's securities are determined.

7. Information on the stages of the procedure for the issue of the issuer's securities.

8. Information on the suspension and resumption of the issue of the issuer's securities.

9. Information on the recognition of the bond program as void, on the recognition of the issue (additional issue) of the issuer's securities as void or invalid.

10. Information on the redemption of the issuer's securities.

11. Information on the registration of amendments to the resolution on the issue of securities in terms of changes to the scope of rights attached to the securities and/or the par value of the securities, including in the event they are consolidated or split up.

12. Information on the adoption of a resolution on the acquisition (occurrence of grounds for acquisition) by the issuer of the securities placed thereby.

13. Information on the accrued (declared) and/or paid out income on the issuer's securities, on other payments attributable to the holders of the issuer's securities, as well as on the intention to fulfil the obligation to make payments under the issuer's bonds, the rights to which are accounted in the issuer's share register.

14. Information on the inclusion by the Russian market operator of the issuer's securities in the list of securities admitted to on-exchange trading for the purpose of concluding purchase and sale contracts, including on listing the issuer's securities by the Russian exchange, or on the exclusion by the Russian market operator of the issuer's securities from the list of securities admitted to on-exchange trading for the purpose of concluding purchase and sale contracts, including on the delisting of the issuer's securities by the Russian exchange, as well as on the transfer of the issuer's securities from one quotation list to another one (on the exclusion of the issuer's securities from one quotation list and their inclusion in another one).

15. Information on the inclusion of the issuer's securities (securities of a foreign entity attaching the rights in respect of the securities of Russian issuers ("depository securities")) in the list of the securities admitted to trading on a foreign organized (regulated) financial market, including on the addition to quotation list of the specified securities by the foreign exchange, and on the exclusion of the issuer's securities (depository securities) from the list of securities admitted to trading on a foreign organized (regulated) financial market, including on the removal from quotation list of the specified securities by the foreign exchange.

16. Information on the issuer's failure to fulfil obligations to the holders of its securities.

17. Information on a party's acquisition of the right or termination of the party's right to, directly or indirectly (through controlled parties), independently or

jointly with other persons related thereto under a trust management agreement, and/or simple partnership, and/or agency, and/or shareholder agreement, and/or other agreement, the subject of which is the exercise of the rights attached to the issuer's shares, to dispose of a certain number of votes attached to the voting shares that constitute the issuer's authorized capital if the specified number of votes amounts to 5 percent, or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attached to the voting shares that constitute the issuer's authorized capital.

18. Information on an offer, including a competitive or mandatory offer for the acquisition of the securities received by the issuer in accordance with Chapter XI.1 of Federal Law No. 208-FZ dated December 26, 1995 On Joint Stock Companies, as well as on changes made to such offers.

19. Information on a notice of the right to claim the repurchase of the issuer's securities or on a claim for the repurchase of the issuer's securities received by the issuer in accordance with Chapter XI.1 of the Federal Law On Joint Stock Companies.

20. Information on the identification of errors in the issuer's disclosed reporting (accounting (financial) statements, consolidated financial statements, financial statements).

21. Information on the performance by the issuer or its controlled entity that is of material importance for the issuer, determined in accordance with clause 1.14 of the Regulations of the Bank of Russia No. 714-П (an "entity controlled by the issuer that is of material importance to it") of a transaction the amount of which is 10 percent or more of the book value of the issuer or of an entity controlled by the issuer that is material to it, according to the accounting (financial) statements of the issuer or the specified entity as of the last reporting date (the closing date of the last completed reporting period preceding the transaction date).

22. Information on the performance by the issuer or an entity controlled by the issuer that is of material importance to it of an interested party transaction that meets the criteria specified in clause 35.1 of the Regulations of the Bank of Russia No. 714-П.

23. Information on changes to the structure and/or the amount of the subject of pledge of the issuer's bonds with collateral, and information on changes in the event any are made to the structure and/or the amount of the subject of pledge of the issuer's mortgage-backed bonds if the changes are caused by the replacement of any claim secured by pledge comprising mortgage-backed bonds, or the replacement of other assets comprising mortgage-backed bonds, the cost (monetary value) of which amounts to 10 percent or more of the amount of the mortgage collateral of the bonds.

24. Information on the issuer's acquisition or termination of the right to, directly or indirectly (through controlled parties), independently or jointly with other parties related to the issuer under a trust management agreement, and/or simple partnership, and/or agency, and/or shareholder agreement, and/or other agreement, the subject of which is the exercise of rights attached to the shares of the entity whose securities are admitted to on-exchange trading, to dispose of a certain number of votes attached to the voting shares that constitute its authorized capital if the specified number of votes amounts to 5 percent, or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attached to the voting shares that constitute the authorized capital of the specified entity.

25. Information on the conclusion by the issuer's controlling party or by an entity controlled by the issuer of a contract providing for the obligation to acquire the issuer's securities.

26. Information on the creation and/or termination of the right of the holders of the issuer's bonds to claim early redemption of the issuer's bonds owned thereby.

27. Information on the assignment of a rating to the securities and/or their issuer, as well as on changes to the rating by a credit rating agency or other organization on the basis of a contract concluded with the issuer.

28. Information on the initiation of court proceedings regarding a dispute related to the issuer's incorporation, governance or participation in it (a "corporate dispute"), or other dispute, under which the issuer is a claimant or defendant, and the amount of claim is 10 percent or more of the book value determined according to the issuer's accounting (financial) statements as of the last reporting date (closing date of the last completed reporting period preceding the date of acceptance of the statement of claim by the court for hearing) (a "material dispute"), as well as on the adoption of the court ruling ending the proceedings regarding examining the merits of the corporate or material dispute, except for information specified in clause 41.6 of the Regulations of the Bank of Russia No. 714-П.

29. Information on the placement of bonds or other financial instruments that attach borrowing obligations to be fulfilled for the issuer's account outside the Russian Federation.

30. Information on a resolution by the Bank of Russia to release the issuer from the obligation to disclose information in accordance with Article 30 of the Federal Law On Securities Market.

31. Information on the acquisition (disposal) of the issuer's voting shares or depositary securities that attach a right in respect of the issuer's voting shares by the issuer or its controlled entity, except for cases when the issuer's voting shares (depositary securities that attach rights in respect of the issuer's voting shares) are acquired in the course of the placement of the issuer's voting shares or the acquisition (disposal) of the issuer's voting shares (depositary securities that attach rights in respect of the issuer's voting shares) by a broker and/or trust manager acting on its own behalf, but at the expense and in pursuance of the client's order.

32. Information on holding and the agenda of a General Meeting of Holders of the Issuer's Bonds, on the resolutions adopted by the General Meeting of Holders of the Issuer's Bonds, as well as on declaring the General Meeting of Holders of the Issuer's Bonds void.

33. Information on the determination by the bond issuer of a representative of the bondholders after registration of the bond issue.

34. Information on the date from which the authority of the representative of the bondholders comes into effect.

35. Information on the conclusion by the issuer of an agreement on the novation or the provision of compensation for release from obligations under the issuer's bonds.

36. Information on the emergence of the right of the holders of the issuer's convertible securities to claim for conversion of the issuer's convertible securities owned by them.

37. Information comprising the issuer's annual consolidated financial statements (financial statements), interim consolidated financial statements (financial statements) for the reporting period consisting of six months of the reporting year, as well as information contained in the auditor's reports prepared in respect of the

aforementioned statements, or other document prepared based on the audit of the interim consolidated financial statements (financial statements) in accordance with auditing standards.

38. Information contained in the issuer's annual reports, except for information previously disclosed.

39. Information comprising the issuer's interim accounting (financial) statements for the reporting period consisting of three, six or nine months of the reporting year, together with information contained in the auditor's reports prepared in respect of the aforementioned statements, if these statements have been audited, as well as information comprising the issuer's annual accounting (financial) statements, together with the auditor's report on them, if they have been audited.

40. Information contained in the reports of the issuers of issue-grade securities prepared for the reporting periods consisting of six and twelve months, except for information previously disclosed.

41. Information contained in the prospectus for the issuer's securities, except for information previously disclosed.

42. Information comprising the conditions for the placement of securities determined by the issuer in a separate document, except for information previously disclosed (in the absence of a prospectus for the securities or the absence of the placement conditions in the prospectus for securities).

43. Information on the issuer entering into a contract for strategic partnership or other contract (transaction), with the exception of contracts (transactions) provided for by clauses 21, 22 and 27 of this List, if the conclusion of such contract (transaction) may have a material impact on the price of the issuer's securities admitted to on-exchange trading (in respect of which an application for admission has been filed).

44. Information on the implementation of interim measures (including seizure) by the court, arbitration court, Federal Bailiff Service in respect of money or other assets owned by the issuer, its controller or a controlled entity that is of material importance to it, or by the provider of security for the issuer's bonds admitted to on-exchange trading (in respect of which an application for admission has been filed) other than the Russian Federation providing a state guarantee of the Russian Federation, or a constituent entity of the Russian Federation providing a state guarantee of a constituent entity of the Russian Federation, or a municipal entity providing a municipal guarantee amounting to 10 percent or more of the book value of the aforementioned entities as of the closing date of the last completed reporting year preceding the implementation of interim measures.

45. Information on a party's acquisition or termination of the right to, directly or indirectly (through controlled parties), independently or jointly with other persons related thereto under a trust management agreement, and/or simple partnership, and/or agency, and/or shareholder agreement, and/or other agreement, the subject of which is the exercise of rights attached to the shares of the provider of the surety, guarantee or collateral for the issuer's bonds admitted to on-exchange trading (in respect of which an application for admission has been filed), if the provider of the surety, guarantee or collateral for such bonds is other than the Russian Federation providing a state guarantee of the Russian Federation, or a constituent entity of the Russian Federation providing a state guarantee of a constituent entity of the Russian Federation, or a municipal entity providing a municipal guarantee, to dispose of a certain number of votes attached to the voting shares that constitute its authorized capital if the specified number of votes amounts to 5 percent, or has become more or

less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attached to the voting shares that constitute the authorized capital of the specified entity.

46. Information on the initiation of a criminal case (that is received by the issuer from preliminary investigation agencies or investigative agencies) in respect of a member of the management bodies of the issuer, its controlling entity, or an entity controlled by the issuer that is of material importance to it or the provider of security for the issuer's bonds admitted to on-exchange trading (in respect of which an application for admission has been filed).

47. Information contained in the materials on the basis of which the management bodies of the issuer, except for the General Meeting of Shareholders, adopt resolutions that may produce a material impact on the price of the issuer's securities admitted to on-exchange trading (in respect of which an application for admission has been filed), except for information previously disclosed.

48. Information on other events (actions) that, in the opinion of the issuer, produce a material impact on the value or quotation of its securities.