



in compliance with the Federal Law No. 224-FL of 27.07.2010 on preventing the illegal use of inside information and market manipulation and on amendments to certain legislative acts of the Russian Federation (hereinafter – the Law) PJSC «MMC «NORILSK NICKEL» suggests that the company’s insiders get acquainted with the information provided.

When evidencing the facts of violation of the procedure of inside information use you should inform about it via hot line: [+7 \(800\) 700-1941](tel:+78007001941), [+7 \(800\) 700-1945](tel:+78007001945) inside@nornik.ru.

This information will be useful for the company’s insiders and will make it possible for them to fulfill promptly and in due manner their obligations stipulated by the Law thus ensuring lawful interests of the company and its investors.

Moreover, you are welcomed to get acquainted with the company’s regulatory and procedural guidelines, adopted in accordance with the Law, the scope of insiders’ responsibilities and other information that could be useful in the process of execution of the law of the Russian Federation, regulating legal relations pertaining to preventing the illegal use of inside information and market manipulation.

Contact information

Contact person in charge of the Insiders’ List: Anna Lakiya.

If you have any questions with regard to insider status, obligations under the Law, please, dial [+7 \(495\) 787-04-41](tel:+74957870441), [+7 \(495\) 787-76-67](tel:+74957877667) ext. 3436, or send your question via e-mail to inside@nornik.ru.

This insider’s mail box (inside@nornik.ru) was created in order to provide insiders of PJSC «MMC «NORILSK NICKEL» with timely consulting on insider status, rights and responsibilities subject to the Law. We kindly ask you to read the following rules of using insider’s mailbox in order to ensure timely communication.

1. The insider’s mailbox serves to consult PJSC «MMC «NORILSK NICKEL» insiders on issues arising from their compliance with the Law.
2. Messages sent to the mailbox are reviewed and responded to by the Division for Preventing Illegal Use of Inside Information of the Compliance Office of the Corporate Department.
3. A message sent to the insider’s mailbox shall include sender’s e-mail for the future response.
4. Insider’s full name, for legal entities — company’s name, full name and job position of a person writing a message on behalf of the company shall be provided at the end of a message.
5. Messages sent with violations of any of the above rules shall not be reviewed.

In order to comply with the provisions of the Law, the company elaborated and adopted the following regulatory and procedural guidelines:



[Regulations on procedures for access to insider information PJSC MMC Norilsk Nickel, and rules for protection of insider information confidentiality and control over compliance with the requirements of laws related to combating insider information unlawful use and market manipulation \(approved by resolution of the Board of Directors of PJSC MMC Norilsk Nickel No.GMK/17-pr-sd dd. 22.06.2020\).](#)

PDF, 0.18 MB



[List of PJSC «MMC «NORILSK NICKEL» Inside Information \(Approved by the Order of the President PJSC “MMC “NORILSK NICKEL” N° GMK10-p of 16.02.2018\).](#)

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An insider shall be aware that:

From the date a person is included in the Company's insider list, certain restrictions shall be imposed upon such person as an insider, envisaged by [article 6](#) of the Law, the insider's responsibility shall be defined in [article 7](#) of the Law, and obligations envisaged by [article 10](#) shall be imposed upon them. Moreover, the law of the Russian Federation specifies administrative and penal responsibilities in compliance with [article 15.21](#) and [part 3 of article 15.35](#) of the Code of Administrative Offences of the Russian Federation and [article 185.6](#) of the Criminal Code of the Russian Federation.

In accordance with the Law and the Bank of Russia Instruction No. 5128-U of 22.04.2019, insiders shall, upon request from the Company, submit a notification of transactions effected by them with securities of the Company and information about derivative agreements that they entered into, the price of which depends on such securities (the "transactions") within the period specified in the request, but no later than ten (10) working days from the date of receiving the request.

If within the requested period insiders have not effected any transactions, they shall submit a notification that no transactions have been effected in response to the request.

Insiders shall provide the Company with their response either in form of an electronic document in the ".dbf", ".xls", ".xlsx", ".txt", or ".csv" format or in a paper-based form thereof.

Insiders shall provide the electronic version of the response to the request (on a CD or a flash drive) together with a paper-based form of the cover letter.

The electronic version of the response shall be signed with the electronic signature of the insider who is an individual or their empowered representative, or the head of the insider or their empowered representative, if the insider is a legal entity.

The paper-based form of the response consisting of more than one sheet shall be numbered and bound, and the reverse side of the last sheet shall bear certification specifying the number of bound sheets in figures and words, with the signature of the certifying person, their full name (including patronymic if any) and the date of certification. The response shall be signed by the insider who is an individual or the head of the insider if the latter is a legal entity or their empowered representative and shall contain information required to identify the insider.

If the response is forwarded by the insider's empowered representative, a document confirming the empowered representative's authority shall be attached thereto.

Securities

Securities of PJSC «MMC «NORILSK NICKEL», in respect of which a person included in the list of insiders of PJSC «MMC «NORILSK NICKEL» shall, upon the Company's request, provide information on effected transactions in accordance with article 10 of the Law.

Shares

Form, category (type): ordinary registered non-documentary shares
State registration number: 1-01-40155-F

Exchange bonds

Type, series and other identification characteristics of the securities, admitted to trading on securities market: Non-convertible interest-bearing documentary exchange bearer bonds of the 50-05 Series with imperative centralized storing

Identification Number of the issue: 4B02-05-40155-F

Date of including the Issuer's securities into the list of securities, admitted to trading on securities market by the Russian securities market trading organizer: 12.02.2014

Type, series and other identification characteristics of the securities, admitted to trading on securities market: Non-convertible interest-bearing documentary exchange bearer bonds of the 50-06 Series with imperative centralized storing

Identification Number of the issue: 4B02-06-40155-F

Date of including the Issuer's securities into the list of securities, admitted to trading on securities market by the Russian securities market trading organizer: 12.02.2014

Type, series and other identification characteristics of the securities, admitted to trading on securities market: Non-convertible interest-bearing documentary exchange bearer bonds of the 50-07 Series with imperative centralized storing

Identification Number of the issue: 4B02-07-40155-F

Date of including the Issuer's securities into the list of securities, admitted to trading on securities market by the Russian securities market trading organizer: 12.02.2014

Type, series and other identification characteristics of the securities, admitted to trading on securities market:

Non-convertible interest-bearing documentary exchange bearer bonds of the 5O-08 Series with imperative centralized storing

Identification Number of the issue: 4B02-08-40155-F

Date of including the Issuer's securities into the list of securities, admitted to trading on securities market by the Russian securities market trading organizer: 12.02.2014

Address and ways to submit notifications

The transaction details shall be submitted to the Company in one of the following ways as chosen by the insider:

1. by delivery to the Company expedition service (against the signature of the empowered representative) located at: 1-iy Krasnogvardeyskiy proezd, 15, Moscow, 123100, Russia, Compliance Office of the Corporate Department, PJSC «MMC «NORILSK NICKEL»;
2. by registered mail with the notice on receipt to the aforementioned address;
3. using software and hardware facilities and the internet.

The present text with the attached files is the unofficial translation of the Russian original version of the text with the attached documents, available on a Russian version of the website, and is published for information purposes only. In all legal matters, the Russian original version of the text with the attached documents applies. PJSC «MMC «NORILSK NICKEL» provides no warranty of any kind and expressly disclaims any liability regarding accuracy, completeness or timeliness of this translation. Only official versions of legal acts in Russian language are mandatory.