



APPROVED BY
Resolution of the Board of Directors of
PJSC MMC Norilsk Nickel
(Minutes No. GMK/36-pr-sd dated 29 November
2021)

PJSC MMC Norilsk Nickel Indigenous Peoples' Rights Policy

1. Scope

This Indigenous Peoples' Rights Policy of PJSC MMC Norilsk Nickel (hereinafter referred to as the Policy) sets forth the fundamental operating principles, obligations, initiatives, and management entities of PJSC MMC Norilsk Nickel (hereinafter referred to as the Company) and the Norilsk Nickel Group business units (hereinafter collectively referred to as the Group) regarding the respect for and protection of indigenous peoples' rights.

The requirements hereof shall be mandatory for the Company employees. This Policy applies to all the Norilsk Nickel Group business units in which the Company directly or indirectly owns more than 50% of the authorized capital (hereinafter referred to as NN BUs), subject to the restrictions and requirements of applicable laws.

2. General Information

The Company encourages respect for the rights of indigenous peoples and quality improvement of their life, supports their development in its regions of operation and complies with its commitments to strengthen and develop mutually beneficial relations. The Company takes into account the interests, views and preferences, as well as the history, culture, traditions, lifestyles and historical heritage of indigenous peoples. The Company acknowledges that building long-term and mutually beneficial relations with them is essential for the sustainable development of the Company and the regions where indigenous peoples live.

The Company fully shares the principles established in Article 7, Convention No. 169 of the International Labour Organization whereby indigenous peoples "shall have the right to decide their own priorities for the process of development as it affects their lives, beliefs, institutions and spiritual well-being and the lands they occupy or otherwise use, and to exercise control, to the extent possible, over their own economic, social and cultural development." This Policy determines the Company's key commitments regarding indigenous peoples' rights and includes accomplishment of the following objectives:

- respect indigenous lands;
- support the traditional natural resource use of indigenous peoples;
- assist in preserving the intangible cultural heritage of indigenous peoples;
- promote indigenous trades;

— provide social support to indigenous peoples with a view to achieving modern living standards and the highest possible level of physical and mental health.

This policy applies across all stages of the Company's production activities including exploration, extraction, smelting, refining, manufacturing of finished products, marketing and sale of non-ferrous and precious metals.

The Group also expects its contractors and suppliers to comply with the principles and provisions hereof.

3. Statutory Framework

3.1. The Group is guided by the federal and regional laws of the Russian Federation including the Federal Law on Safeguarding the Rights of the Minor Indigenous Peoples of the Russian Federation and the Federal Law on the Areas of the Traditional Natural Resource Use of the Minor Indigenous Peoples of the North, Siberia and the Far East of the Russian Federation, as well as the laws of other countries where it operates and recognized Russian¹ and international standards² related to interaction with minor indigenous peoples. The Policy also takes account of and is based on the UN Universal Declaration of Human Rights, the UN Declaration on the Rights of Indigenous Peoples, the Indigenous and Tribal Peoples Convention (No. 169) of the International Labour Organization, the UN Sustainable Development Goals, the International Finance Corporation's (IFC's) Performance Standards on Environmental and Social Sustainability, the UN Guiding Principles on Business and Human Rights (UNGPR), the GRI reporting standards as well as the Voluntary Principles on Security and Human Rights (VPSHR). The Group engages with stakeholders in a manner consistent with the recommendations³ of ISO 26000:2010 and AA1000SES, 2015.

3.2. This Policy shall be read in conjunction with:

- the Business Ethics Code of PJSC MMC Norilsk Nickel;
- Human Rights Policy of PJSC MMC Norilsk Nickel;
- the Local Community Relations Policy of PJSC MMC Norilsk Nickel;
- the Charity Work Regulations of PJSC MMC Norilsk Nickel and other policies of the Company.

4. Commitments and Principles

4.1. The Company and Russian business units within Norilsk Nickel Group (hereinafter referred to as NN RBUs) carry out regular assessment of the social impact of their operations including the life and activities of indigenous peoples and local communities.

¹ The Responsibility Standard for the residents of the Arctic zone of the Russian Federation for interaction with the minor indigenous peoples of the Russian Federation residing and performing traditional economic activities in the Arctic zone of the Russian Federation.

² IFC Performance Standards.

³ These standards are non-binding and do not require conformity certification.

4.2. The Company and NN RBUs conduct regular identification and assessment of potential and actual risks related to the human rights of indigenous peoples and the relevant impact made by the Company and NN RBUs.

4.3. The Company and NN RBUs make sure that the values and beliefs of indigenous peoples are taken into account when making managerial decisions at all production stages in order to avoid negative impact on minor indigenous peoples (IPs).

4.4. The Company and NN RBUs are committed to hold regular consultations with IPs in good faith and appropriate manner to reach agreement or consent on proposed measures. They also seek to settle differences in a constructive and transparent way.

4.5. The Company and NN RBUs are in regular contact with the representatives of indigenous peoples to safeguard their interests and needs, keep minutes of the meetings with the representatives of IPs and other local communities, ensure feedback following the analysis of the interests and needs of indigenous peoples and other local communities.

4.6. The Company and NN RBUs confirm their readiness to ensure the implementation of the principle of free, prior and informed consent (FPIC) of indigenous peoples in applicable cases in accordance with the standards and recommendations of the International Council on Mining and Metals (ICMM)⁴ and the procedure adopted by the Company.

4.7. The Company and NN RBUs provide indigenous peoples with access to the complaint management mechanism that enables resolution and redress of complaints related to the activities of the Company and NN RBUs. Applications may be submitted with the indication of the applicant's personal data or anonymously. The Company and NN RBUs do not tolerate any punishment, disciplinary action or retaliation against anyone who reports concerns and assists in investigating misconduct.

4.8. The Company and NN RBUs cooperate with the representatives of indigenous peoples in order to identify and address the interests and critical issues specific to indigenous peoples and local communities that may create a long-term positive impact.

4.9. The Company and NN RBUs support the social and economic development of indigenous peoples as well as IPs' social, economic and cultural rights.

4.10. The Company and NN RBUs develop projects focused on preventing unfavorable impact on indigenous peoples, regulate or compensate for unavoidable residual impact.

4.11. The Company and NN RBUs take actions to prevent and eliminate violations of indigenous peoples' rights across its businesses and departments.

4.12. The Company and NN RBUs maintain active and effective cooperation with government authorities and other external stakeholders in order to encourage the social, economic and institutional development of the communities in the regions of operation.

⁴ ICMM Good Practice Guide: Indigenous Peoples and Mining; ICMM Position Statement: Indigenous Peoples and Mining.

4.13. The Company and NN RBUs seek to avoid involuntary physical or economic relocation of families and communities and, where possible, follow the mitigation hierarchy. In cases where the relocation of indigenous peoples is necessary, the Company and NN RBUs recognize the right of indigenous peoples to return, if possible, to the places of their traditional residence when the reasons for the relocation are no longer in effect.

4.14. The Company and NN RBUs do not tolerate any discrimination against indigenous employees as regards, in particular, access to employment, equal pay for equal work, healthcare and social assistance, the right of association.

4.15. The Company and NN RBUs will not use force or coercion of any form in disregard of the human rights and key freedoms of indigenous peoples.

5. Governance

Management entity	Key functional responsibilities
1. Board of Directors	
The Company's Board of Directors	Approves this Indigenous Peoples' Rights Policy of PJSC MMC Norilsk Nickel and amendments hereto. Approves the Group's Sustainability Report including the respect for and protection of IPs' rights.
PJSC MMC Norilsk Nickel Board of Directors' Sustainability and Climate Change Committee	Provides the Board of Directors with opinions on assessment of the efficiency and quality of the creation and implementation of key projects on IPs. Monitors the quality and efficiency of the implementation of material amendments to the approved strategies, goals, programs, projects and other significant initiatives on IPs' rights. Prepares recommendations for the Board of Directors on achieving compliance with regulatory or legislative enactments and the requirements of standards and associations on IPs' rights.
2. Management Board	
PJSC MMC Norilsk Nickel Management Board	Considers the Group's Sustainability Report including the respect for and protection of IPs' rights.
PJSC MMC Norilsk Nickel Management Board's Risk Management Committee	Monitors the key risks including those identified while interacting with IPs. Ensures that appropriate response measures are in place to address the said key risks. Makes recommendations to the PJSC MMC Norilsk Nickel Management Board on the key risks including those identified while interacting with IPs.
3. The Company's Head Office Departments	

Management entity	Key functional responsibilities
Vice President for Federal and Regional Programs	<p>Ensures stakeholder engagement in the implementation of programs and projects focused on the sustainable development of the Company's regions of operation while implementing the Company's Indigenous Peoples' Rights Policy.</p> <p>Coordinates the activities of the Company's departments and NN RBUs as regards the Company's commitments on indigenous peoples' rights.</p>
Sustainable Development Department	<p>Participates in monitoring and analyzing changes in legislation and recognized international standards on sustainable development including engagement with IPs.</p> <p>Provides methodological support for compliance with recognized international sustainability standards including engagement with IPs.</p> <p>Conducts stakeholder analysis for inclusion in the Stakeholder Engagement Plan (hereinafter referred to as the SEP) for engagement with IPs.</p> <p>Prepares an annual consolidated SEP including IP engagement activities.</p>
Accounting, Taxation and Financial Reporting Department	<p>Organizes financial risk accounting in accordance with the International Financial Reporting Standards and other standards, reflects financial assessment of significant risks associated with IP engagement in the Group's financial statements.</p> <p>Prepares and certifies financial disclosures related to IP engagement.</p>
Economic Department	<p>Ensures budgeting and control over budget performance in the Company and RBUs including special budgets and provisions.</p> <p>Ensures information collection to prepare the Company's public reporting as part of its functional area.</p> <p>Ensures coordination of the activities of related functions in order to automate data input and processing as well as control procedures for planning, accounting and budget data monitoring.</p>
Federal and Regional Programmes Department	<p>Participates in analyzing the feasibility of entering into partnership agreements with all stakeholders in its domain and monitors their implementation.</p> <p>Engages stakeholders in implementing federal and regional projects/programs by the Company and NN RBUs.</p> <p>Ensures that the opinions of IPs and stakeholders affected by the Company's operations are taken into account.</p>

Management entity	Key functional responsibilities
	<p>Reviews issues considered at events with IP representatives, the results of IP engagement and commitments made.</p> <p>Participates in considering and settling complaints/requests from stakeholders, including IPs, as part of its functional responsibility area.</p> <p>Coordinates stakeholder engagement in the implementation of programs and projects focused on the sustainable development of the Company's regions of operation while implementing the Company's Indigenous Peoples' Rights Policy and biodiversity conservation measures.</p> <p>Ensures building long-term constructive relations with IPs, holding an efficient dialogue with IP representatives as well as discussion and interaction regarding issues critical to IPs in the regions of operation as part of the implementation of the Company's Indigenous Peoples' Rights Policy.</p>
Marketing Department	Assesses the impact of risks and opportunities associated with stakeholder engagement on the Company's sales activities.
Investor Relations Department	Assesses the impact of risks and opportunities associated with stakeholder engagement on the Company's investment attractiveness and compliance with the investors' requirements and expectations.
Environmental Department	<p>Engages with stakeholders, including IPs, on environmental issues, climate change, water management, biodiversity conservation, waste management, air and soil condition, remediating and/or offsetting adverse environmental impact within the Company's production facility footprint.</p> <p>Develops and implements environmental programs focused on ecosystem biodiversity conservation in the regions of operation.</p>
Social Policy Department	<p>Participates in interactions focused on social policy and sustainable development, engages with the stakeholders in the regions of operation, implements programs aimed at supporting initiatives valuable to the minor indigenous peoples of the North.</p> <p>Regularly analyses the social situation in the Company's regions of operation.</p> <p>Organizes annual surveys of the participants of social and charity programs to collect feedback.</p> <p>Participates in human rights risk management within its functional responsibility area.</p> <p>Participates in considering and resolving stakeholder complaints/requests within its functional responsibility area.</p>

Management entity	Key functional responsibilities
HR Department	Shapes and implements an overall corporate policy on engagement with social partners as regards social and labor relations.
Risk Management Service	<p>Monitors the implementation of key risk management activities including engagement with indigenous peoples.</p> <p>Develops overall corporate methodological approaches and principles related to risk management.</p> <p>Provides the PJSC MMC Norilsk Nickel Management Board's Risk Management Committee with consolidated information on managing key risks including IP engagement.</p>
Production Department Assets	<p>Coordinates the management of technical and operational risks that may affect stakeholders within the department's functional responsibility area.</p> <p>Participates in managing stakeholder engagement risks within its functional responsibility area.</p>
Public Relations Department	Interacts with the Company's units when publishing information related to stakeholder engagement on the Company's corporate website.
Internal Department Control	<p>Receives complaints/requests related to IP engagement submitted via the Corporate Trust Service (CTS), determines their accuracy, analyses and processes such information.</p> <p>Organizes and conducts audits of complaints/requests related to IP engagement received by the CTS.</p> <p>Monitors the status of control activities carried out as a result of the inspections initiated by the CTS.</p> <p>Informs the heads of the Company's departments and NN BUs, the business curators of NN RBUs and the curators of the Company's separate divisions about the statistics of requests submitted via the CTS and related to issues concerning IP engagement, systemic flaws and violations detected via the CTS.</p> <p>Ensures the accessibility of the complaint management mechanism.</p>
4. Company's Production Divisions and Business Units within the Norilsk Nickel Group	
NN BUs and the Company production divisions	<p>Participate in stakeholder engagement and the implementation of actions and initiatives on mitigating and managing risks identified during stakeholder engagement including indigenous peoples.</p> <p>Participate in considering and settling complaints/requests from stakeholders as part of their functional responsibility.</p>

6. Policy Implementation Monitoring and Assessment

The Company undertakes the following measures aimed at monitoring and evaluating the implementation of this Policy:

6.1. Monitors the implementation of the annual SEP and its results.

6.2. Analyzes activities related to indigenous peoples' rights for reporting in accordance with the International Council on Mining and Metals (ICMM) guidelines.

6.3. Every three (3) years, the Company undertakes an independent verification of the reporting documents of the Company's major production divisions by evaluating the results of stakeholder engagement as per the standard of the International Council on Mining and Metals (ICMM) individually for each production department.

7. Reporting

7.1. The Company reports on its IP engagement and IP rights protection activities in the Group's Sustainability Report and the Company's Annual Report for the respective year, as well as in other non-financial reports on economic, social and environmental performance in accordance with the Global Reporting Initiative (GRI) standards.

7.2. The Company seeks to disclose information⁵ in accordance with the standards of the Initiative for Responsible Mining Assurance (IRMA) and the commitments imposed by its membership in the International Council on Mining and Metals (ICMM), and the other standards adopted by the Company.

7.3. The Company considers the UN Global Compact and the UN Guiding Principles on Business and Human Rights for reporting on its stakeholder engagement activities including indigenous peoples.

8. Liability

Liability for late introduction of amendments hereto lies with the Vice President for Federal and Regional Programs.

9. General Provisions

This Policy is subject to a regular review by the Company's Board of Directors (at least every 5 years).

10. Terms, Definitions and Abbreviations

10.1. The following terms apply herein with their respective definitions:

⁵ Except for potentially sensitive information considered a trade or state secret, and information related to vulnerable groups and other stakeholders.

10.1.1. **Norilsk Nickel Group** means PJSC MMC Norilsk Nickel and the Norilsk Nickel Group business units.

10.1.2. **Stakeholders** means individuals and legal entities, groups and associations and other organizations external to the Company, whose interests may be affected by the Company's activities, as well as the parties that may influence the Company.

10.1.3. **Stakeholder Engagement Plan** is a list of activities ensuring that stakeholder engagement is efficiently managed.

10.1.4. **Intangible cultural heritage** means traditions, forms of representation and expression, knowledge and skills as well as associated tools, objects, artefacts and cultural spaces recognized by communities, groups and, in some cases, individuals as part of their cultural heritage.

10.1.5. **Production Unit** means a division (mine, plant or factory, etc) carrying out production and business activities resulting in products and/or services with its own corporate structure.

10.1.6. **Free, prior and informed consent (FPIC)** means the right recognized by the UN Declaration on the Rights of Indigenous Peoples that enables indigenous peoples to grant or refuse their consent for a project that affects their cultural heritage and is to be implemented in the area of their traditional residence and economic activity. FPIC also enables indigenous peoples to agree on the terms and conditions under which a project affecting their interests will be planned, designed, implemented, monitored and evaluated. The rights of minor indigenous peoples in the Russian Federation are guaranteed by the Constitution of the Russian Federation, Federal Law No. 82-FZ of April 30, 1999 *On Guarantees of the Rights of Minor Indigenous Peoples of the Russian Federation*, Federal Law No. 49-FZ of May 7, 2001, *On Territories of Traditional Nature Use by Minor Indigenous Peoples of the North, Siberia and the Far East of the Russian Federation*, Land Code No. 136-FZ of October 25, 2001 (Article 39.14), Russian Government Order No. 132-r of February 4, 2009 *On the Concept of Sustainable Development for Minor Indigenous Peoples of the North, Siberia and the Far East of the Russian Federation*, as well as regional laws.

10.1.7. **Underprivileged communities** means any group or part of a community with a higher risk of being discriminated against or being subject to other violations of rights, adverse impacts of economic crises, etc., as compared to other groups or the rest of the community.⁶

10.2. The following abbreviations are used herein:

Group	Norilsk Nickel Group
IP	Indigenous Peoples
NN BUs	Norilsk Nickel Group business units
UN	United Nations
SEP	Stakeholder Engagement Plan

⁶ As defined by the World Health Organization.

NN RBUs	Norilsk Nickel Group Russian business units
CTS	Corporate Trust Service
FPIC	Free, prior and informed consent
GRI	Global Reporting Initiative
ICMM	International Council on Mining and Metals
IFC	International Finance Corporation
IRMA	Initiative for Responsible Mining Assurance
UNGP	United Nations Guiding Principles on Business and Human Rights
VPSHR	Voluntary Principles on Security and Human Rights