

Information on IRC – R.O.S.T., the registrar of the Company and the acting Ballot Committee of MMC Norilsk Nickel

JSC IRC – R.O.S.T. (former R.O.S.T. Registrar merged with Independent Registrar Company in February 2019) was established in 1996. In 2003–2015, Independent Registrar Company was a member of Computershare Group, a global leader in registrar and transfer agency services. In July 2015, IRC changed its ownership to pass into the control of a group of independent Russian investors. In December 2016, R.O.S.T. Registrar and Independent Registrar Company, both owned by the same group of independent investors, formed IRC – R.O.S.T. Group of Companies. In 2018, Saint Petersburg Central Registrar joined the Group. In February 2019, Independent Registrar Company merged with JSC IRC – R.O.S.T. Ultimate beneficiaries of IRC – R.O.S.T. are individuals with a strong background in business management and stock markets. No beneficiary holds a blocking stake in the Group.

In accordance with indefinite License No. 045-13976-000001, IRC – R.O.S.T. keeps records of holders of registered securities.

Services offered by IRC – R.O.S.T. to its clients include:

- > Records of shareholders, interestholders, bondholders, holders of mortgage participation certificates, lenders, and joint property owners;
- > Meetings of shareholders, joint owners, lenders, company members, etc. Electronic voting
- > Postal and electronic mailing
- > Corporate consulting
- > Buyback of securities, including payments for securities repurchased
- > Proxy solicitation
- > Call centre services
- > Depositary and brokerage, including escrow agent services

IRC – R.O.S.T. invests a lot in development of proprietary high-tech solutions, e.g. remote online services for shareholders and issuers. The services enable them to obtain all legal documents electronically when requesting information from the registrar, preparing for and holding shareholders' meetings, including electronic voting, maintaining ownership rights or requesting document status updates, etc.

For shareholders' meetings, IRC – R.O.S.T. uses a dedicated automatic system to promptly and accurately process documents, count votes and produce any reports as may be required by regulatory standards or clients.

IRC – R.O.S.T. is committed to information security. The company follows its regularly revised and updated External and Internal Security Guidelines and the one-of-a-kind Risk Mitigation Programme covering both technology and management processes. IRC – R.O.S.T. Group is certified to ISO 9001:2015 Quality Management System (QMS).

Every fifth Russian issuer is serviced by registrars of IRC – R.O.S.T. Group. Its clients include public corporations (Rosatom, ROSCOSMOS, Transneft, Aeroflot, United Shipbuilding Corporation, ROSGEO, Garnizon, Morinformsystem-Agat, etc.) and large private companies (Polyus, NOVATEK, METALLOINVEST, MegaFon, Acron, United Wagon Company, ENEL, etc.).

Authorised representatives of the issuers are serviced in real time at the head office in Moscow or through a network of 67 representative offices located in 47 regions, including St.Petersburg, Norilsk, Krasnoyarsk, Samara, Chelyabinsk, Nizhny Novgorod, Perm, and Yekaterinburg.

IRC – R.O.S.T is an incumbent member of:

- > PARTAD (Professional Association of Registrars, Transfer Agents and Depositories)
- > Association of Banks of Russia (Association 'Russia')
- > NFA (National Finance Association), associate member
- > RSPP (Russian Union of Industrialists and Entrepreneurs)
- > Subcommittee 1 on the Security of Financial Transactions set up in coordination with the Bank of Russia

The IRC – R.O.S.T. executives are active members of the following dedicated committees:

- > RSPP Committee on Corporate Relations
- > RSPP Commission on Public Utility
- > Expert Council for Legal Support of Securities and Derivatives Market at the State Duma Committee on Financial Market
- > Bank of Russia's Committee on Registrar Standards
- > Central Depository User Committee
- > NP RTS Association
- > Coordination Council of PARTAD and the National Securities Market Association.

IRC – R.O.S.T. topped the National Rating Agency's independent registrar ranking for the second year running, leading in all key categories both in 2018 and 2017.

Since 2013, the Company has been consistently ranked on top of the key national ranking published by the Infrastructure Institute Fund for Financial Research in cooperation with PARTAD.