



Protecting and respecting human rights at Nornickel

December 2022



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Human rights and sustainability agenda



Human rights as part of the sustainability agenda

Human rights: UN fundamental principles

Human rights are rights inherent to all human beings, regardless of origin, gender, ethnicity, religion, language or any other status

The list of inalienable human rights includes:

- right to life, liberty and the security of person
- right to privacy
- right to work, right to education and many more

Respecting and protecting human rights is a key objective for the UN and most governments around the world



Human rights as part of the international sustainability agenda

In 2015, the UN General Assembly adopted **17 Sustainable Development Goals (SDGs)** underpinning the global sustainability agenda until 2030

13 SDGs are directly linked to human rights



Four SDGs are indirectly linked to the agenda for human rights protection and respect



Business and human rights

Key ESG principles:

protecting and respecting human rights is a comprehensive practice crucial to business sustainability

Responsible practices: protecting human rights across the production process and during interactions with local communities

Risk management: assessing and mitigating human rights risks associated with the Company's activities, and remediating potential adverse impacts

Impact management: preventing direct or indirect negative impacts from the Company's activities, while enhancing positive impacts

Human rights in Nornickel's sustainability strategy

Industry

Metals and mining companies are exposed to specific human rights risks

Geography

Nornickel's core assets are located in difficult terrains and climates and thus need to meet additional requirements for living and working conditions

Scale

The size of the Company, as well as the number of employees and other stakeholders, calls for a particular focus on protecting human rights

Reputation

Compliance with international standards is crucial to maintaining the Company's business reputation and securing its position in global supply chains

Compliance

To avoid legal risks, including risks of lawsuits, the Company must comply with Russian laws

Nornickel is the largest industrial company in the Russian Arctic and one of the world's major producers of platinum group metals and nickel

>73,000
employees

>500
suppliers and contractors across the supply chain

>60,000
people
work in the Arctic Circle

5
communities where Nornickel is a backbone enterprise

4.6
million people
reside in Nornickel's regions of operation¹

6
various indigenous northern minorities live in Nornickel's regions of operation

Source: Company data

1. Rosstat data as of 1 January 2022 for the Krasnoyarsk Territory, Murmansk Region and Zabaykalsky Territory.

Key human rights initiatives and declarations with which Nornickel seeks to comply

International and Russian initiatives

UN Global Compact



Social Charter of Russian Business



The Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy



United Nations Guiding Principles on Business and Human Rights (UNGPR)



Practical guidance

A Guide for Integrating Human Rights into Business Management (UNGC)



The Global Reporting Initiative, uniform reporting standards and guidelines



Voluntary Principles on Security and Human Rights (VPSHR)



Industry initiatives

IRMA Standard for Responsible Mining (2018)



ICMM's Mining Principles



The Responsible Mineral Initiative (RMI)



Nornickel's human rights priorities¹

Employees

1. Fundamental rights

- Right to life
- Right to liberty
- Right to the security of person and privacy
- Right to freedom of movement
- Right to a healthy environment

2. Labour rights

- Right to work
- Right to just and favourable remuneration
- Right to just and favourable working conditions
- Right to social security
- Right to a reasonable limitation of working hours
- Right to periodic holidays with pay
- Prohibition of forced labour

3. Rights to occupational health and safety

4. Rights to freedom of association and collective bargaining

5. Rights related to family, maternity and child protection

6. The rights of employees and external stakeholders to a healthy environment

Local communities

7. Community and indigenous rights

Counterparties

8. Requirements for counterparties to respect human rights in order to build a responsible supply chain

1. For more information broken down by type of human rights, see slides 19–40, Appendices: Examples of projects promoting human rights principles.

2021 highlights in protecting and respecting human rights

Key achievements

- Human Rights Policy updated
- New programme developed to improve workplace safety
- First FPIC¹ process in the Arctic
- Air quality monitoring system launched in Norilsk
- Corporate Healthcare project launched
- The Corporate Trust Line expanded to include a category for reports concerning human rights
- First comprehensive employee training on human rights (150 people)
- Supplier Code of Conduct developed and approved
- Responsible Sourcing Policy developed and approved

Performance highlights

Decent working conditions

RUB 145,100
average monthly salary
(2.3 times the average monthly wage in Russia²)

RUB 1.9 billion
total spending on improving living and working conditions

Health and safety

RUB 12.7 billion
total spending on occupational health

Freedom of association

94%
of Company employees covered by collective bargaining agreements

Local communities

RUB 421.5 million
projects to support indigenous peoples

Environment

-16%
reduction of SO₂ emissions in Nor Nickel's regions of operation versus 2020

Source: Company data

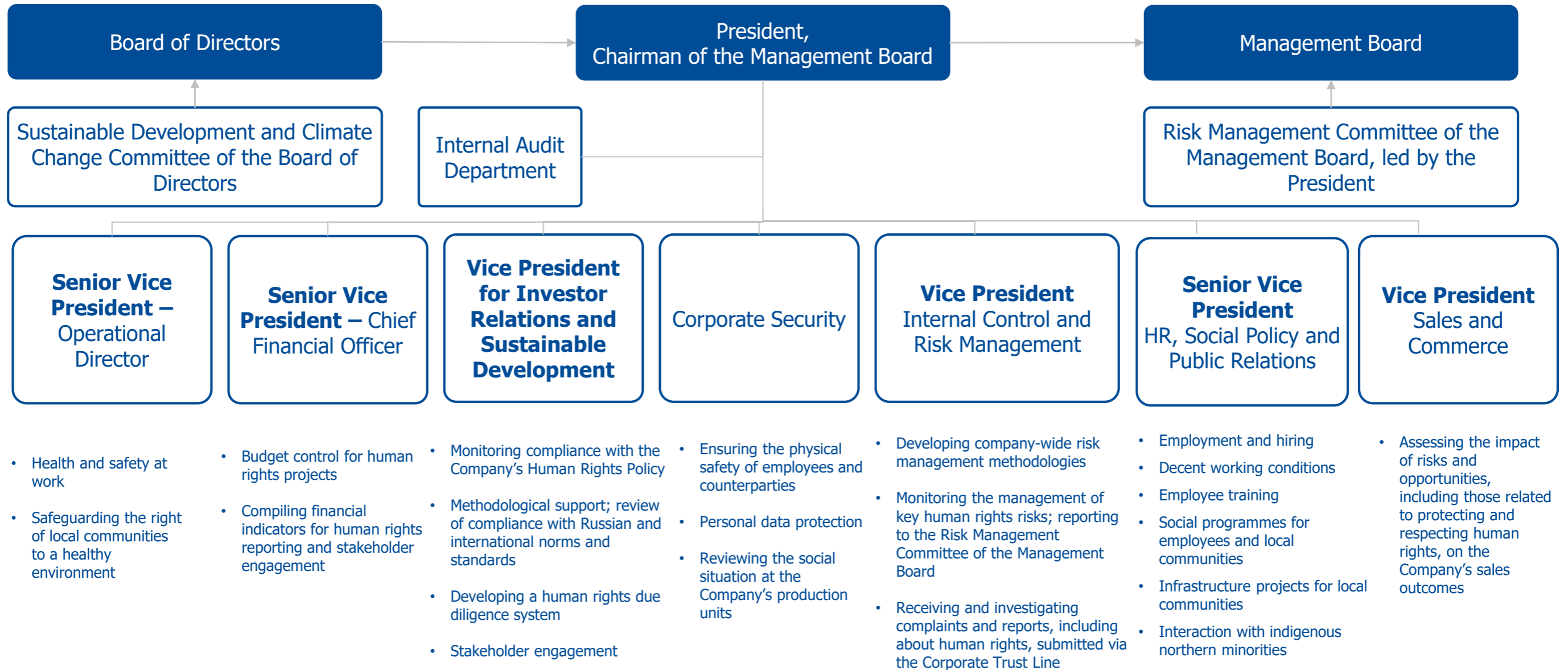
1. Free, prior and informed consent.

2. Russia's average monthly wage according to Rosstat.

Governance, responsibility and control structure



Human rights protection: Governance, responsibility and control structure*



Source: Company data

The key functional responsibilities of the Company’s governance bodies and managers are set out in the Human Rights Policy of MMC Norilsk Nickel https://nornickel.com/upload/iblock/95a/powuh4jf2f5xo2q3eawae438dhypreum/pjsc_mmc_norilsk_nickel_human_rights_policy.pdf

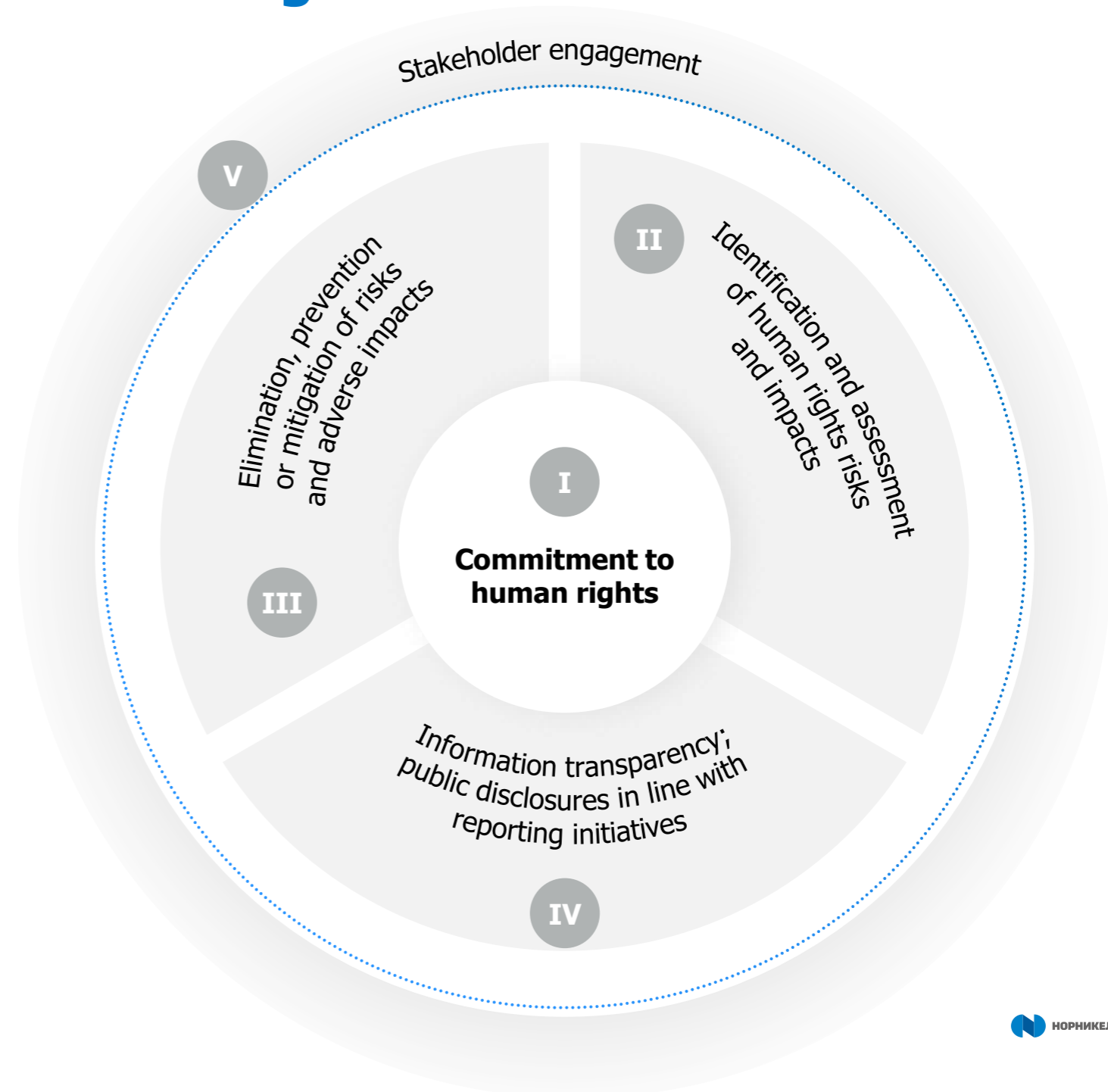
Human rights due diligence



A target state for Nornickel's human rights due diligence

Key goals of establishing a due diligence system at Nornickel

- Integrate human rights principles into policies and management systems
- Ensure uniform policies and procedures across all business segments
- Promote human rights as part of the corporate culture and human rights risk management system
- Assign officers responsible for human rights matters across the Company's organisational levels
- Provide ongoing training and raise awareness among employees; inform suppliers and contractors
- Build company-wide sustainability capabilities
- The due diligence system rollout was started in 2022 and is scheduled to be completed in late 2023



Roadmap for improving Nornickel's human rights due diligence system¹

Status as at
2022-end

I. Commitment to human rights

- 1.1. Company-wide human rights policy
- 1.2. Business process transformation plan in line with human rights principles
- 1.3. Human rights requirements for suppliers



II. Human rights risk assessment

- 2.1. Identification, analysis and assessment of human rights risks and impacts
- 2.2. Integration of human rights risks into the corporate risk management system
- 2.3. Due diligence management system and supplier due diligence



III. Prevention of human rights violations

- 3.1. Human rights risk factor register
- 3.2. Risk management action plan



IV. Monitoring and reporting

- 4.1. Reports on human rights protection and stakeholder engagement



V. Stakeholder engagement

- 5.1. Annual discussions or public consultations on the Company's ESG plans and performance
- 5.2. Improvement of the grievance mechanism
- 5.3. Free, prior and informed consent; public consultations with indigenous peoples



implemented planned / in progress

1. A human rights due diligence system is currently being established.

I. Commitment to human rights

Nornickel's key corporate human rights documents



Business Ethics Code



Human Rights Policy



Equal Opportunities Programme



Working Conditions Policy



Occupational Health and Safety Policy



Responsible Sourcing Policy



Supplier Code of Conduct



Community Engagement Policy



Indigenous Rights Policy



Freedom of Association Policy

■ The Company's internal regulations are available on its website and are accessible to a wide range of stakeholders

II. Human rights risk assessment (1/2)

Comprehensive assessment of human rights impacts is scheduled to be completed in 2023

Phase 1

Policy and risk assessment

2021–2022



- ✓ Preparing recommendations to adapt company policies and corporate regulations
- ✓ Embedding human rights into the Company's corporate culture

Phase 2

In-depth risk analysis and impact assessment at the production unit level

2023



- ✓ Running an in-depth cause and effect analysis
- ✓ Drafting targeted recommendations for mines and production sites regarding risk mitigation, as well as monitoring and control mechanisms, prevention of infringements, and remediation
- ✓ Publishing reports on human rights protection and stakeholder engagement

✓ implemented

✓ planned for 2023

II. Human rights risk assessment (2/2)

Requirements for suppliers to respect human rights as part of building a responsible supply chain

Nornickel contributes to preventing or minimising infringements of human rights across the supply chain

Nornickel's human rights principles and commitments are set out in its **Supplier Code of Conduct**¹ and **Responsible Sourcing Policy**,² adopted in 2021

For more details on the due diligence management system, please see slides 37–39

Nornickel does not use and will not tolerate the use of any forms of modern slavery at every stage of its supply chain, including forced or indentured labour, human trafficking, child labour, or any forms of discrimination, while requiring its suppliers to prevent infringements of human rights in their operations and across their supply chains³

The Company recognises the risks of adverse impact on human rights, including risks of conflicts associated with extracting, trading, handling, and exporting minerals from conflict-affected and high-risk areas, and will not tolerate, contribute to, or profit from, any form of human rights violations or abuse throughout its supply chains, including:

- cruel, inhuman and degrading treatment, or any forms of torture
- any forms of forced labour
- the worst forms of child labour
- other gross human rights violations and abuses, such as widespread sexual violence
- war crimes or other serious violations of international humanitarian law; crimes against humanity or genocide⁴

1. https://nornickel.com/upload/iblock/343/supplier_code_of_conduct.pdf

2. https://nornickel.com/upload/iblock/b45/responsible_sourcing_policy.pdf

3. Source: Human Rights Policy of MMC Norilsk Nickel

4. Source: Responsible Sourcing Policy of MMC Norilsk Nickel

III. Prevention of human rights violations

IV. Monitoring and reporting

III. Prevention of human rights violations

- ✓ Human rights risk factor register
- ✓ Risk management action plan

-
- Developing a risk and impact management action plan
 - Implementing immediate measures to mitigate human rights violations and ensuring remediation
 - Improving mechanisms to handle reports
 - Training in human rights protection

IV. Monitoring and reporting

- ✓ Reports on human rights protection and stakeholder engagement

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- Monitoring human rights risks and consequences
 - Monitoring the effectiveness of human rights due diligence
 - Monitoring the effectiveness of activities listed on the risk and impact management action plan for the reporting period
 - Publishing human rights reports

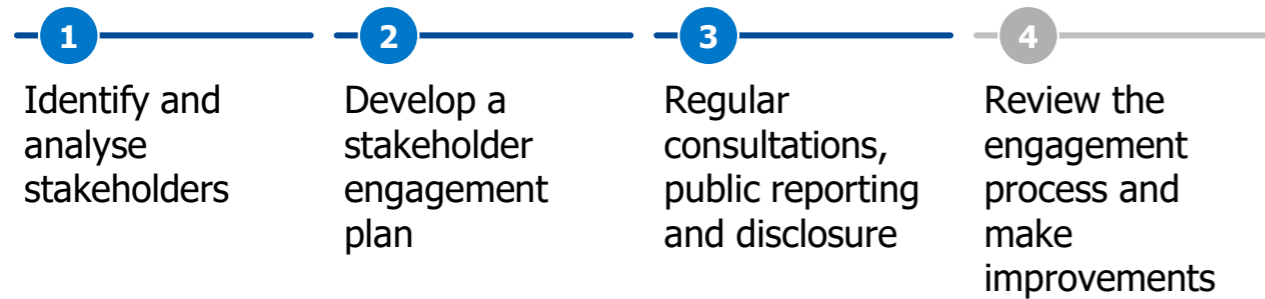
✓ implemented ✓ planned for 2023

V. Stakeholder engagement (1/4)

Nornickel maintains an active dialogue with its stakeholders across a range of sustainability aspects, **including human rights**

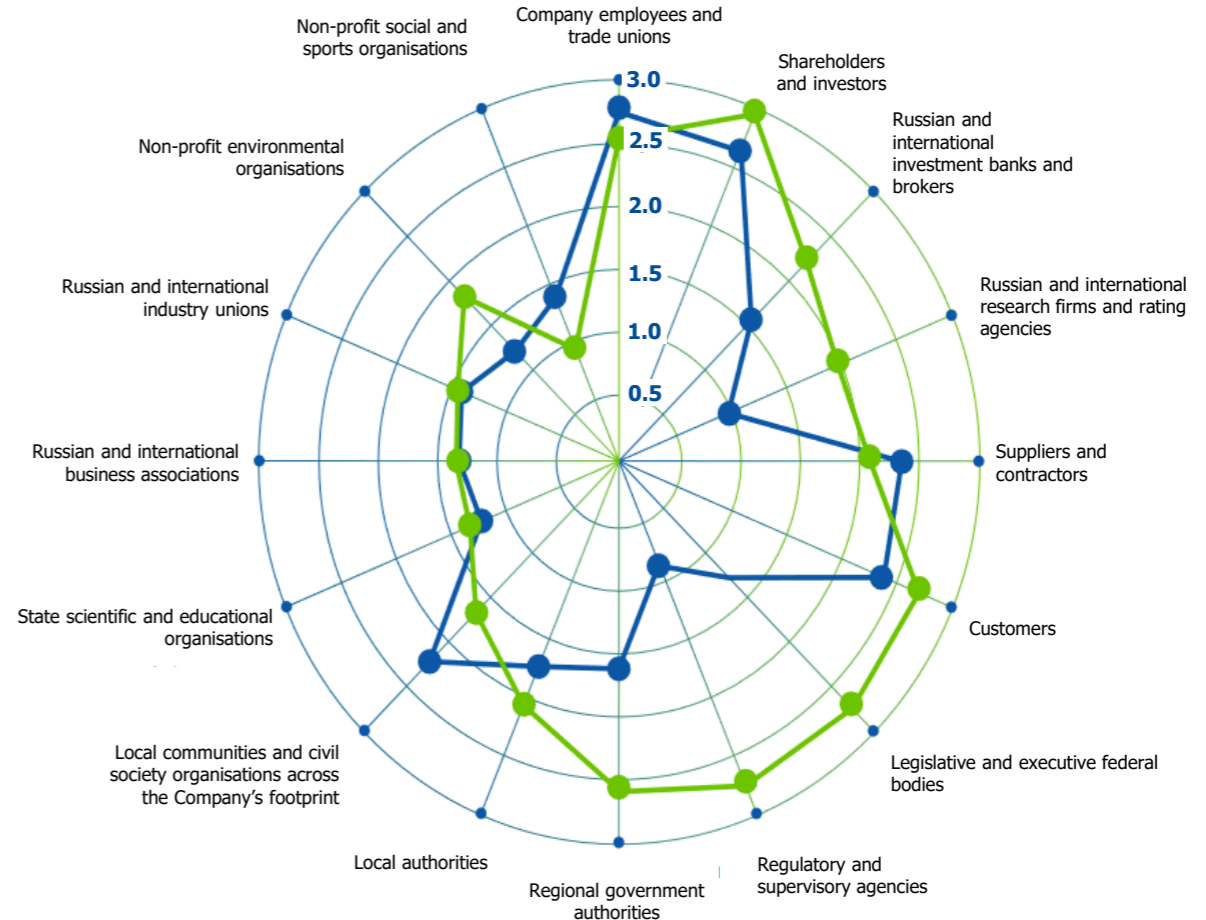
These efforts are focused on building mutually beneficial long-term relationships with stakeholders

Stakeholder engagement procedure



● implemented ● in progress

Nornickel's stakeholder map¹



● The impact of Nornickel Group's operations on the stakeholder

● The stakeholder's impact on Nornickel Group

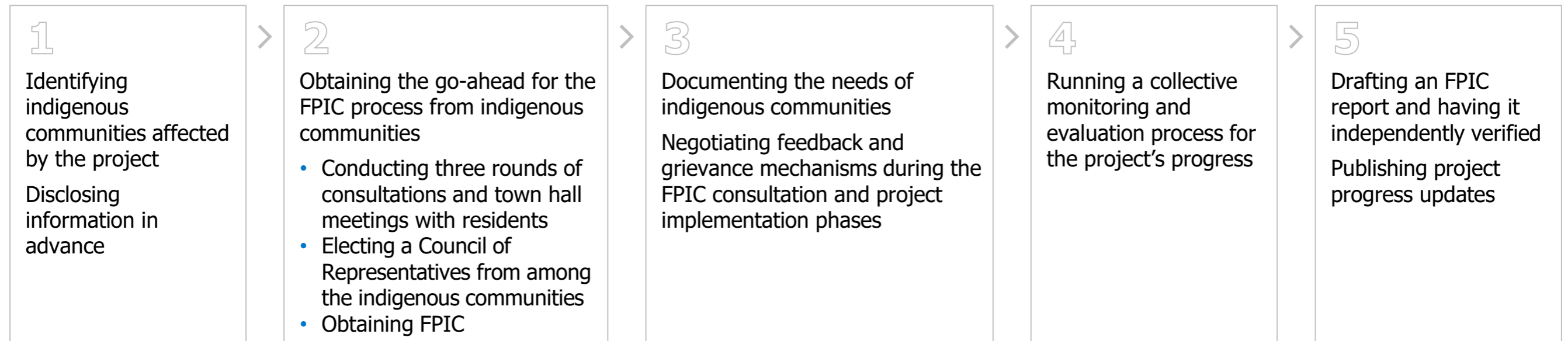
1. The map takes data from assessments conducted by managers from Nornickel's business units responsible for engaging with relevant stakeholder groups. Engagement on human rights complies with AA100 SES, IRMA and UNGP standards.

V. Stakeholder engagement (2/4)

Free, prior and informed consent

Free, prior and informed consent (FPIC) is a right outlined in the United Nations Declaration on the Rights of Indigenous Peoples and Convention No. 169 of the International Labour Organisation, which allows indigenous peoples to give or withhold their consent to a project that may affect their interests or territories, or cultural heritage. Furthermore, FPIC enables indigenous peoples to negotiate the conditions under which the project will be designed, implemented, monitored, and evaluated.

FPIC process



In October 2021, Nornickel ran an FPIC process for a relocation project at Tukhard, involving leading UN international experts

The process was based on the Standard of Responsibility for the Residents of Russia's Arctic Zone

As part of the process (three town hall meetings, consultations with experts and the election of the Council of Representatives), Tukhard residents:

- determined the terms under which they gave their consent to the Company to relocate
- signed an agreement regarding the Tukhard relocation and development programme at a meeting between Nornickel and the Council of Tukhard's Representatives
- chose the location and infrastructure of the new settlement
- the construction of a new settlement for 600 to 700 residents is scheduled for completion in 2026

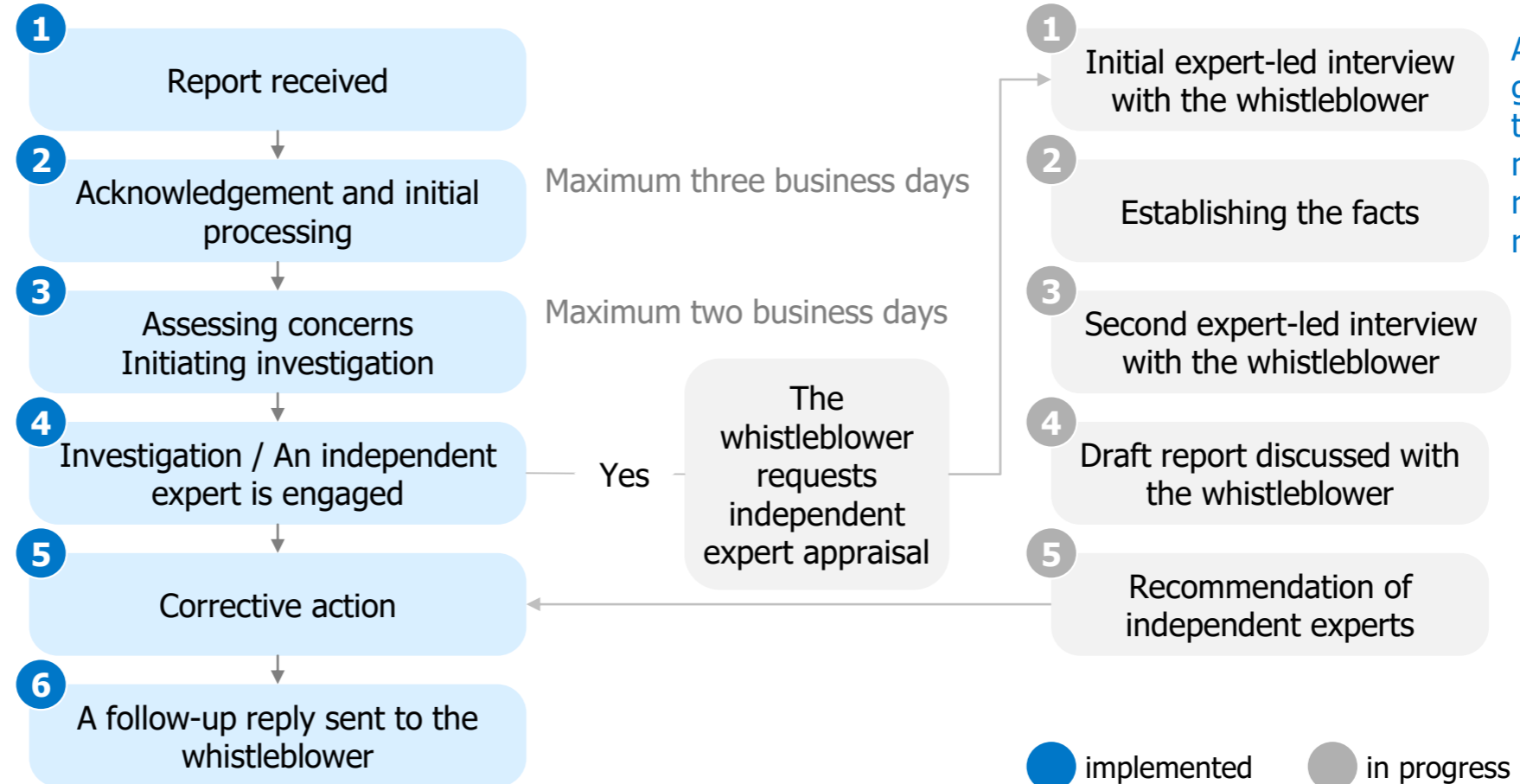
V. Stakeholder engagement (3/4)

Grievance mechanism

Grievance mechanism principles

- Accepting all reports without exception
- Keeping reports confidential and anonymous
- Keeping the whistleblower updated on the progress of their report
- Requesting independent review of reports
- Engaging independent experts to maintain a dialogue and negotiate solutions

Grievance mechanism operation¹



At any stage of the grievance process, the whistleblower may exercise their right to statutory remedies

Contact information for the Corporate Trust Line

✉ skd@nornik.ru

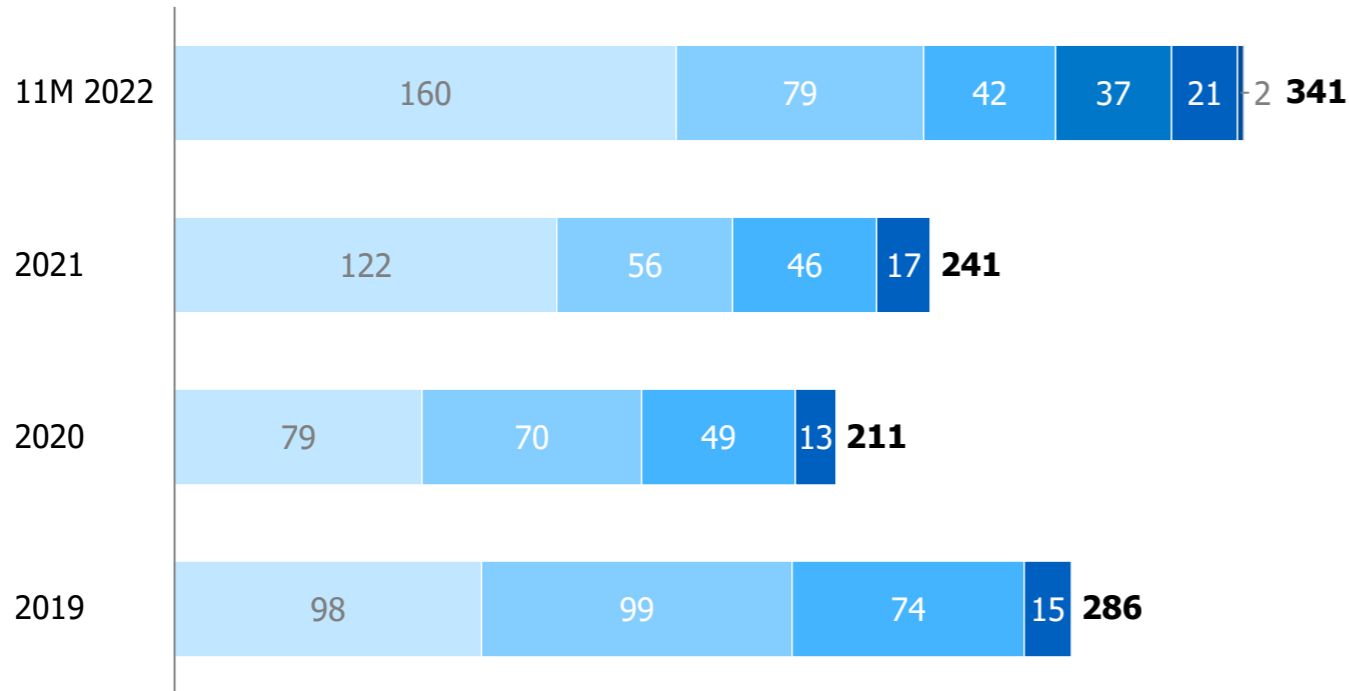
☎ +7 800 700 1941
+7 800 700 1945

🌐 <https://nornickel.com/sustainability/corporate-hotline/>

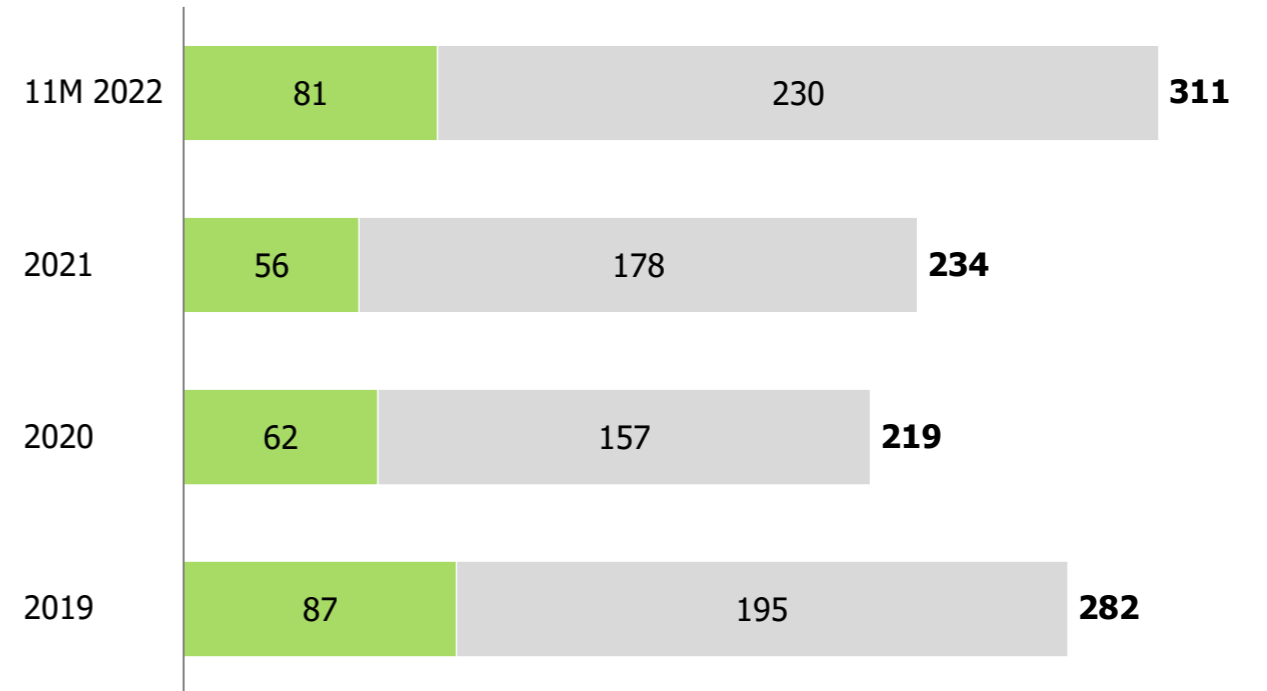
V. Stakeholder engagement (4/4)

Reports received and addressed

The number of human rights-related reports received



The number of human rights-related reports addressed by confirmation status



■ Labour relations
 ■ Payroll abuses
 ■ Social issues
 ■ Confirmed and reviewed
 ■ Not confirmed
■ Technology; health and safety abuses
 ■ Ethical standards and principles
 ■ Human rights and freedoms

Source: Company data

1. Data for 2022 are for 11 months.

2. The attributes for classifying reports into the Ethical Standards and Principles and Human Rights and Freedoms categories were first identified as part of the grievance mechanism in 2022.

3. The number of reports received during the year is not equal to the number of reports closed in the same year, with reports "under review" shown for the start and the end of the year.

Appendix

Examples of projects promoting human rights principles



1 Fundamental employee rights (1/2)

Nornickel safeguards all fundamental human rights and creates comfortable living conditions for its employees

- Preventing any form of discrimination or forced and child labour
- Supporting employees relocating for their job and running housing programmes
- Protecting employees' personal data and ensuring security of person

- **Prevention of forced and child labour**

0 cases of discrimination, or forced or child labour were identified in 2021 through internal audits

- **Housing programmes**

The Company regularly offers its employees, many of whom work in the Arctic Circle, a wide range of benefits and programmes to provide them with comfortable living conditions

In 2021, Nornickel spent **RUB 1,042 million** on housing programmes and **RUB 211 million** on relocation allowances to help new employees settle into their new communities

- **Upholding the right to privacy and the security of person**

Nornickel has a **Personal Data Policy** in place to protect human and civil rights and freedoms when processing personal data. The Company regularly takes external audits for compliance with personal data protection requirements

1 Fundamental employee rights (2/2)

Caring about employee health

- Regular checks of employee health, health improvement and health resort treatment programmes for employees and their family members
- Plans to provide employees and their families with quick and easy access to quality healthcare in line with the latest standards by 2025 under the Corporate Healthcare programme

Hazardous working conditions

- Provision of personal protective equipment, wash-off and decontaminating agents, as well as nutritious and healthy food products

COVID-19 response

- About 10,000 people worked remotely during the peak months of the pandemic
- Provision of personal protective equipment, tests, medical devices, and sanitiser products
- Purchase of medicines and medical equipment
- A vaccination awareness campaign amongst employees, a fully paid (average daily wage) extra day off after each vaccination (including booster)



2 Employee labour rights (1/5)

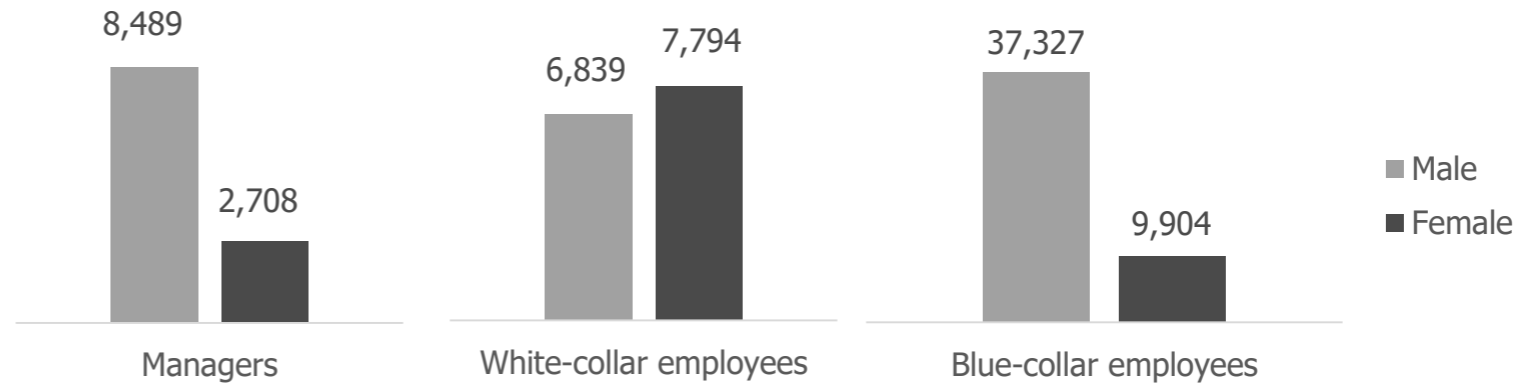
Employment by region and gender

Nornickel is one of the largest employers and taxpayers in Russia and is also a backbone enterprise

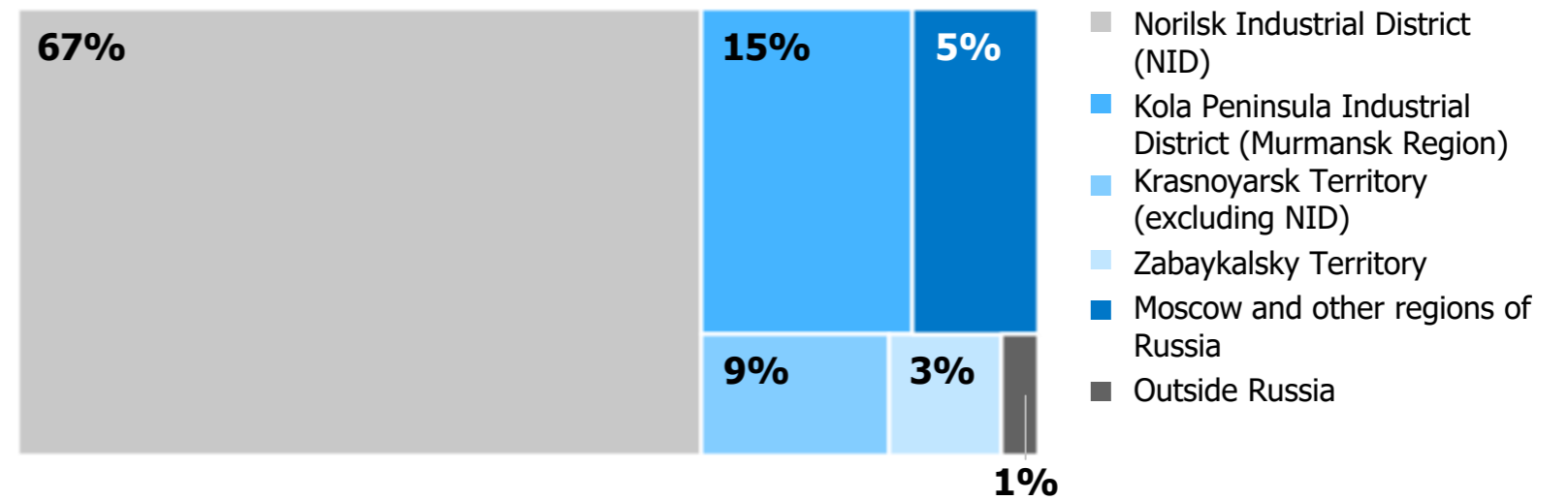
73,557 employees – the Group’s average headcount in 2021, with **99%** employed by its Russian entities

| Key cities and regions of operation | Unemployment rates in 2021 |
|---|----------------------------|
| Norilsk | 0.3% |
| Taimyrsky Dolgano-Nenetsky Municipal District | 0.7% |
| Monchegorsk | 1.7% |
| Zapolyarny | 1.6% |
| Nikel | 2.2% |

Breakdown of employees by gender and category in 2021



Breakdown of Group employees by region in 2021



2 Employee labour rights (2/5)

Decent working conditions and just remuneration

Nornickel ensures favourable terms of employment for its employees

- The average salary paid to Nornickel employees is well above Russia's average
- Our benefits package includes:
 - voluntary health insurance
 - discounted trips to health resorts for employees and their families
 - reimbursement of holiday travel expenses for employees and their families based in the Far North
 - assistance to employees relocating for their job
- Social programmes to support employees (the I Understand service, Doctor at the Office, psychological assistance, and the Let Everyone Be Heard programme)

Key 2021 remuneration indicators

| Region | Average monthly salary, RUB thousand | Ratio to the regional average |
|---------------------------------------|--------------------------------------|-------------------------------|
| Across the Group | 145.1 | 2.3 ¹ |
| Moscow and other regions | 291.9 | 2.6 |
| Norilsk Industrial District (NID) | 142.8 | 1.2 |
| Zabaykalsky Territory | 130.1 | 2.5 |
| Murmansk Region | 103.7 | 1.4 |
| Krasnoyarsk Territory (excluding NID) | 90.3 | N/A |

Source: Company data, Rosstat

1. The average salary at Nornickel Group vs Russia's average.

2 Employee labour rights (3/5)

Equal rights and opportunities

Nornickel ensures equal opportunities across all groups of employees, enforces non-discrimination and creates development opportunities

- Combatting any form of discrimination
- Running training and career programmes
- Running the Equal Opportunities Programme

Nornickel's Business Ethics Code establishes ethical business principles

- Build respect both inside and outside the Company
- Respect at the workplace and teamwork
- Promote equal opportunities
- Create a friendly and stable working environment
- Fair and impartial evaluation of employee performance; hires and promotions based solely on professionalism, knowledge and skills

Equal opportunities

- Women account for **40%** of seats on the Management Board and **41%** of managers and white-collar employees
- Nornickel is a key partner of the **Women in Mining Russia** association

Training and education

- Skill-based programmes targeting managers at various levels
- **More than 50,000** employees use the Nornickel Academy corporate education platform
- Partnerships with **25** higher education institutions across Russia, including for teaching engineering
- Annual career guidance projects covering **more than 29,500** school students
- Construction of an innovative children's education centre for up to **1,100** students in Norilsk (estimated project cost: **RUB 4 billion**)
- Corporate scholarships for university students and internships with Nornickel Group companies

Equal Opportunities Programme¹

The Company has a number of programmes in place to provide equal opportunities for work and employment for all groups of current and potential employees

- The Career Start-Up programme
- A support programme for new hires
- Flexible recruitment methods
- An employment programme for teenagers
- A programme for socially vulnerable groups
- A programme for disabled people

Source: Company data

1. https://nornickel.com/upload/iblock/995/Equal_Opportunities_Programme.pdf

2 Employee labour rights (4/5)

Social security

Nornickel offers its employees benefits and social support

- Discounted recreation and trips to health resorts for employees and their families
- Reimbursement of holiday travel expenses and baggage fees for employees and their families based in the Far North and territories equated thereto, when travelling to and from their holiday destinations
- Voluntary health insurance
- One-off financial assistance
- Complementary corporate pension plan

Housing programmes

- The **Our Home / My Home** programme, running since 2010
 - A combined programme that offers employees the opportunity to buy ready-to-move-in apartments on attractive terms in different regions with a favourable climate across the country
 - As at 2021, **3,826 apartments** had been provided to Nornickel employees
- The **Your Home** housing programme, running since 2019
 - The Company has bought a total of **2,103 turnkey apartments**
- **The Corporate Social Subsidised Loan Programme**
 - About **1,000 employees** have participated

Health improvement programmes

In 2021, more than **24,000 employees** were covered

Nornickel organises trips for the children of employees each year. In 2021, the Company organised a visit to the Black Sea coast as well as online summer camps for children from the Murmansk Region, Norilsk and Dudinka

Co-Funded Pension Plan

A private corporate pension programme

- As at the end of 2021, the programme covered **10,776 employees**, with **5,019 retirees** already receiving pensions

2

Employee labour rights (5/5)

Social guarantees for employees when closing production sites

Nornickel provides a full package of social benefits for employees made redundant by the closure of smelting facilities on the Kola Peninsula and in Norilsk

The Company ensures seamless internal transfer to other operations and also provides retraining and a pension plan

Shutdown of Nickel Plant

In August 2016, the Company closed Norilsk's Nickel Plant to reduce its adverse impact on local communities, supporting employees made redundant in the following ways:

- Setting up dedicated advice centres to help employees choose a new job
- Providing jobs for redundant employees
- Providing employees with vocational training at the Norilsk Nickel Corporate University
- Developing and implementing various social programmes, such as Metallurgy Veterans; paying allowances to vulnerable groups of employees and women for whom there were no available jobs matching their qualifications

By the end of 2016, **65%** of employees had been transferred to new roles within the Company, while more than **1,158** employees were retrained

Shutdown of the smelting shop in Nikel and the metallurgical shop in Monchegorsk

To improve local environmental conditions in the Murmansk Region, the Company shut down smelting operations in Nikel **in December 2020** and the metallurgical shop in Monchegorsk **in March 2021**

- Between 2019 and 2021, **1,388** employees were covered by the social support programmes, **698** of whom were re-employed by the Company on the same salary during the first year of employment
- In 2020, expenses under the social programme totalled **RUB 478.3 million**, with **RUB 402.1 million** paid to **241** dismissed employees as redundancy payments, severance pay or financial assistance

3

Employee rights to occupational health and safety

Nornickel is continuously improving and ensuring industrial and occupational safety across its operations

Programme to improve living and working conditions at production sites

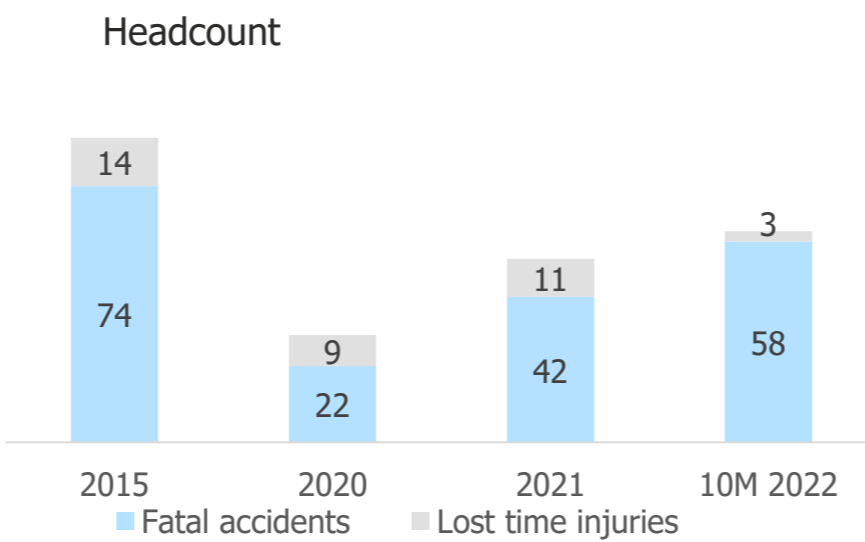
The Company enhances living and working conditions across its operations on a regular basis

- Since its launch in 2003, **416 social facilities** have been upgraded and **434 portable buildings** have been purchased, with total investments exceeding **RUB 6.5 billion**
- In 2022–2024, the programme’s budget will total **RUB 8.8 billion**, with **over 400 social facilities** planned to be repaired

Major occupational safety initiatives

- An initiative implemented to improve the transparency of accident reporting
- A company-wide KPI established to cut the total number of work-related accidents **by 20%**
- A project to transform safety culture piloted at Norilsk Concentrator
- Programmes implemented to upskill staff in operating hazardous facilities

Work-related accidents¹



| | 2019 | 2020 | 2021 |
|---|------|------|------|
| Health and safety expenses, RUB bn | 10.3 | 9.7 | 12.7 |
| Health and safety expenses per employee, RUB thousand | 140 | 136 | 177 |
| LTIFR | 0.32 | 0.2 | 0.38 |

Source: Nornickel’s Sustainability Report 2021

Note: 1. The increase in 2021 is due to the Company’s focus on making internal reporting more transparent to obtain as much information as possible, not only on fatalities and severe injuries but also on intermediate and minor injuries, as well as near-miss accidents.

4

Employee rights to freedom of association and collective bargaining

Nornickel's Freedom of Association Policy establishes business principles

- The Company recognises the right of its employees to establish, join, participate in, and withdraw from a trade union in order to protect their interests and engage in collective bargaining
- The Company respects employees' right to collective bargaining
- The Company maintains neutrality towards all professional associations and other organisations representing employees
- The Company protects employees from anything that limits their freedom of choice, such as discrimination based on race, skin colour, gender, origin, language, religion, disability, political preferences, or on any other grounds; loss of wages or termination of employment

Key elements of Nornickel's Social Partnership Framework as at 2021-end:

- A total of **23 collective bargaining agreements** covering **94%** of Nornickel employees
- **7.6%** of all Nornickel employees were members of trade unions, while **77.2%** were represented by social and labour councils
- Group companies have **collective decision-making bodies** representing the employer, employees and trade unions
- Membership of the **Yenisei Basin Trade Union of Russia's Water Transport Workers** (Krasnoyarsk)
- Participation in the **Interregional Cross-Industry Agreement for Copper and Nickel Producers and Production Support Providers** for 2019–2022
- **Social Partnership Agreements signed between MMC Norilsk Nickel and the Trade Union of MMC Norilsk Nickel Employees, an interregional public organisation, in 2020–2022**

5 Employee rights related to family, maternity and child protection

The Company's social policy focuses on supporting families, mothers and children

- Paid maternity and childcare leave
- Financial assistance paid for childbirth/adoption to employees bringing up disabled children under 18, or in the event that an employee or an employee's family member is diagnosed with a serious illness
- Health improvement programmes for employees and their families, including trips for children to children's health resorts (without their parents)
- Annual reimbursement of holiday travel expenses for employees and their non-working family members based in the Far North
- Providing employees with voluntary health insurance (VHI), including discounted VHI for their families
- Social programmes to support families and promote family leisure

Maternity and childcare leave

Nornickel continues to pay salaries to its employees on maternity leave and provides financial assistance to employees on childcare leave

| | 2019 | 2020 | 2021 |
|--|-------|-------|-------|
| Number of Nornickel employees on maternity and/or childcare leave | 1,664 | 1,617 | 1,528 |
| Nornickel employees back from maternity and/or childcare leave over the year | 892 | 653 | 771 |

Family recreation and health improvement programmes

The Company's benefits package includes discounted recreation and health resort treatments for employees and their families, as well as reimbursement of round trip holiday travel expenses and baggage fees for employees and their families based in the Far North and territories equated thereto

| | 2019 | 2020 | 2021 |
|---|-------|-------|-------|
| Spending on recreation and health resort treatment for employees and their families, RUB mln | 1,907 | 791 | 2,076 |
| Spending on reimbursing round trip holiday travel expenses and baggage fees for employees and their families, RUB mln | 3,150 | 2,706 | 3,295 |

6 The rights of employees and external stakeholders to a healthy environment (1/2)

Management system

- Nornickel's **Environmental Management System** has been in place since 2006
- The Company's **Environmental and Climate Change Strategy** was adopted in 2021 to dramatically **reduce air emissions**

Reducing the negative impact on local community health

Three major obsolete metallurgical assets shut down since 2016

- **2016** Nickel Plant in Norilsk
- **2020** Smelting shop in Nikel
- **2021** Kola MMC's metallurgical shop

-
- **Kola Division:** SO₂ emissions reduced by 90% since 2015, ahead of targets (an 85% reduction from a 2015 baseline)
 - **Norilsk Division:** SO₂ emissions reduced by 15% in 2021 vs a 2015 baseline, with the Sulphur Project in full swing

The **Sulphur Project** is Nornickel's flagship environmental project for sulphur dioxide capture and recovery, aiming to reduce SO₂ emissions in Norilsk **by 90% by 2025**

The first phase of an advanced air quality monitoring and forecasting system in Norilsk and Monchegorsk has been completed

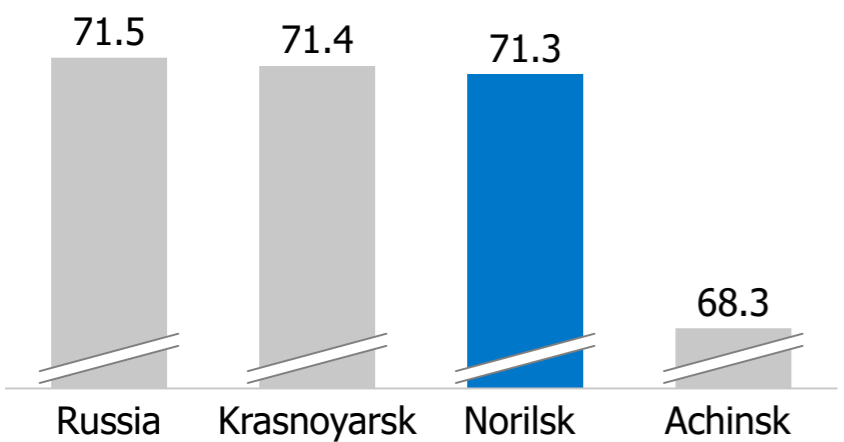
6

The rights of employees and external stakeholders to a healthy environment (2/2)

Nornickel respects everyone’s right to a healthy environment and seeks to provide such an environment to its employees and local residents by:

- implementing ambitious environmental projects
- consistently reducing its environmental footprint

Average life expectancy at birth in 2020¹



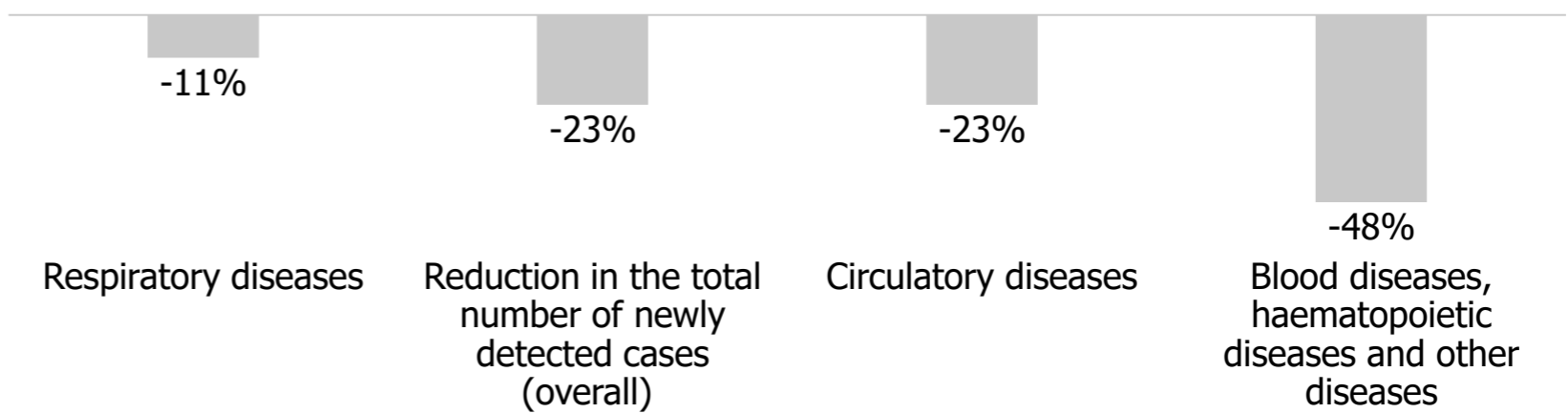
Reducing the negative impact on local community health

Rospotrebnadzor constantly scrutinises the impact of emissions on the health of the local population, as the healthcare system in the regions where the Company operates is almost entirely state-run

SO₂ emissions in Norilsk **have decreased by 30%–35%** since the Nickel Plant shutdown in 2016

The plant shutdown has also significantly reduced the number of new disease cases, according to Rospotrebnadzor data from 2019

Reduction in the total number of newly detected cases in Norilsk since 2016 (per 1,000 people)¹



Sources: Rosstat, Rospotrebnadzor
 Note: 1. Populations: Russia – 146.7 million, Norilsk – 183,000, Krasnoyarsk – 1.1 million, Achinsk – 106,000.

7 Community and indigenous rights (1/5)

Engagement with indigenous peoples

Nornickel respects the rights, ancestral lands, traditional trades and culture, historical heritage, and interests of indigenous peoples and seeks to enhance and foster good neighbourly relations

- Nornickel has in place a **Coordination Council** encompassing **52** communities from across the Taimyrsky Dolgano-Nenetsky District along with representatives of the Association of Indigenous Peoples of Taimyr and the Association of Indigenous Peoples of the Khatanga and Karaul Rural Settlements
- An indigenous peoples unit has been set up within the Polar Division

Ethnological expedition and support programme for indigenous peoples

In 2020, Nornickel joined forces with an independent group of scientists to run a **large-scale ethnological expedition**. A series of opinion polls was conducted, with local community representatives given the opportunity to voice their proposals for desired actions to support their traditional way of life, as well as compensatory measures in response to the petroleum product spill at CHPP-3

The survey covered a total of **670** people representing five major ethnic groups of indigenous peoples of the North (Dolgans, Nenets, Evenks, Enets, and Nganasans): **100** interviews were held with representatives of these peoples, and the opinions of community leaders were examined. Following the survey, the **Comprehensive Support Programme for Indigenous Peoples of the North through 2024** was developed

The World of Taimyr grant competition

The competition's grant funding totalled **RUB 46 million**. The Company supported **28** social impact **initiatives** run in 2021–2022

Grants were used to fund projects to preserve long-standing traditions, as well as to improve the indigenous territories of Taimyr

The winners included **six projects proposed by family (tribal) communities, two projects proposed by non-profit organisations, and 20 projects proposed by municipal and public institutions**



7 Community and indigenous rights (2/5)

Cooperation agreement

A **four-party agreement on interaction and cooperation with associations of indigenous peoples of the Russian Federation, the Krasnoyarsk Territory and the Taimyrsky Dolgano-Nenetsky Municipal District** was signed in September 2020

A **programme** to promote the socio-economic development of the Taimyrsky Dolgano-Nenetsky Municipal District in the Krasnoyarsk Territory will be run through 2024

The Programme provides for over **40 activities across seven focus areas** by 2024:

- Projects to support traditional trades
- Housing
- Healthcare
- Education and culture
- Sports and infrastructure
- Tourism
- Development and support via new and existing foundations



The programme spans **five years**, with its funding totalling about **RUB 2 billion**

7 Community and indigenous rights (3/5)

Improving quality of life

Nornickel helps communities maintain a sustainable economic position and contributes to improving the quality of life of local residents

- Continuously developing a framework for interaction with local communities
- Running charitable and grant programmes and competitions
- Supporting socio-economic development across its footprint
- Helping local communities adapt to climate change
- Complying with the principle of free, prior and informed consent

Improving the quality of life of local communities

In 2021, Nornickel’s key programmes and initiatives aimed at improving the quality of life of local communities included:

- The World of New Opportunities – a charity programme
- Plant of Goodness – a corporate volunteering programme
- programmes to support sports and fitness

Key focus areas of the World of New Opportunities programme in 2021

| Focus area | Programmes and projects | |
|------------|--|---|
| Develop! | We Are the City! social technologies forum | World of Taimyr project competition |
| | Socially Responsible Initiatives Competition | Peremena education project SVET ON online youth forum |
| Invent! | IMAKE engineering marathon | |
| Act! | Training course and investment session | Convention of Social Entrepreneurs from the Arctic |
| | | Norilsk business forum |
| Create! | Projects by regional development institutions: | |
| | Norilsk Development Agency | Second School Centre for Community Initiatives of the Pechengsky District Monchegorsk Development Agency |

7 Community and indigenous rights (4/5)

Improving the quality of life of local residents

Norilsk renovation

Under an agreement on the social and economic development of Norilsk, Nornickel will partner with the city administration, the government of the Krasnoyarsk Territory, and the Federal Ministry for the Development of the Far East and the Arctic to carry out a large-scale renovation of Norilsk

A comprehensive plan for the development of Norilsk through 2035 was approved in 2021

The renovation programme comprises:

- renovation of the housing stock
- development of social infrastructure
- upgrades of utilities
- provision of social payments for housing purchases for Norilsk-based residents relocating from the Far North



A total of **185 initiatives** are planned until 2035, covering almost **260 facilities**

Nornickel's total investment will amount to **RUB 81.3 billion**

7 Community and indigenous rights (5/5)

A favourable social environment

Corporate Healthcare programme

The **Corporate Healthcare** programme covers Nornickel’s major operating regions. The key centres listed on the approved programme of projects are:

| Centre | Scheduled commissioning dates |
|--|-------------------------------|
| The medical centre in the central part of Norilsk, with an in-house laboratory, dental department, and radiology centre, including MRI | 2024–2025 |
| Medical centre in the Talnakh District | 2023–2024 |
| Medical centre in the Kayerkan District | 2023–2024 |
| Medical centre in Dudinka | 2022 |
| Medical centre in Monchegorsk | 2023–2024 |
| MRI centre in Monchegorsk, preliminarily part of the government guarantee programme | 2022 |



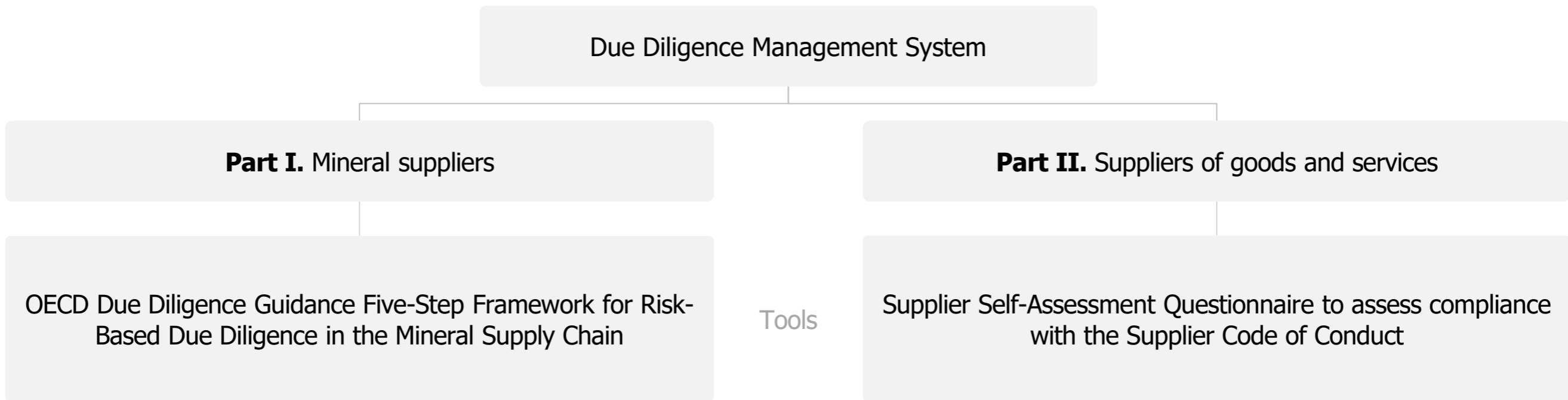
The first corporate medical centre was launched in Norilsk **in December 2021**. The centre offers a wide range of healthcare services, almost 250 in total. The clinic operates under the Z-Clinic brand, designed by the Group for the healthcare activities of the Zapolyarye Health Resort



Scope of Nornickel's Due Diligence Management System (1/3)

Nornickel pays particular attention to human rights risks when conducting supplier due diligence as part of the Due Diligence Management System

Our current due diligence management system collects basic information about suppliers, maps the supply chain, identifies red flags, and manages risks upon confirmation

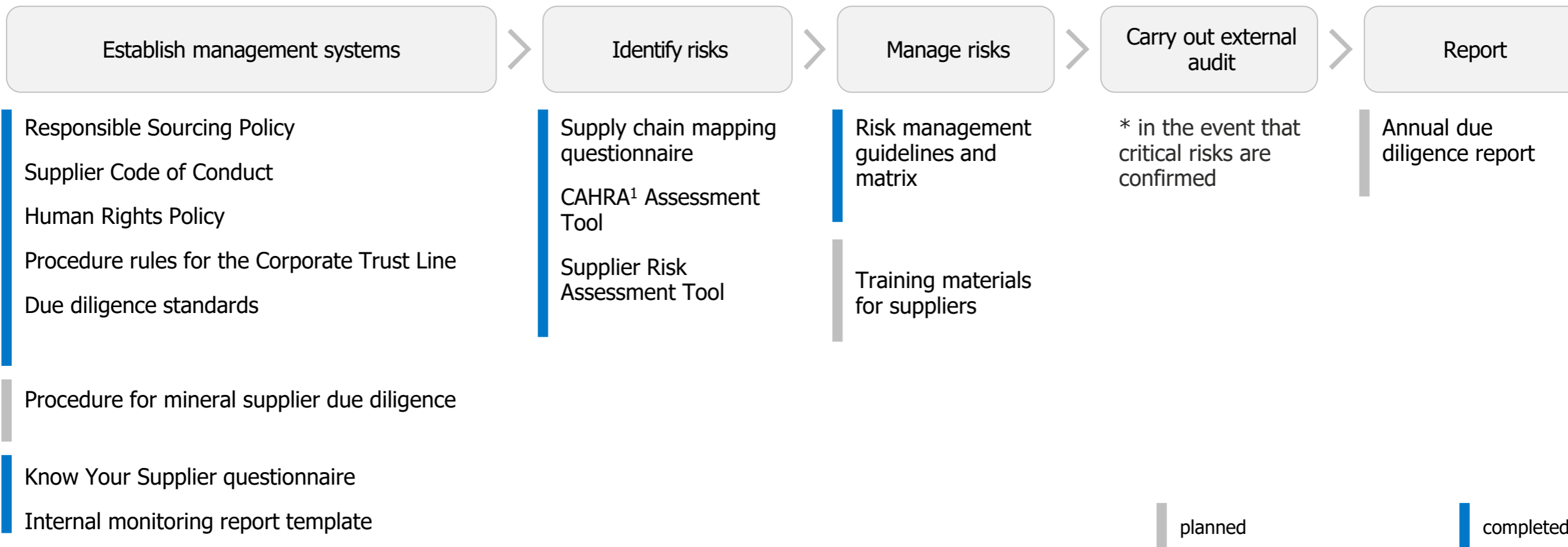




Nornickel's Due Diligence Management System process (2/3)

Responsible mineral supply chain

The Due Diligence Management System enables comprehensive due diligence of suppliers against ESG criteria, **including human rights**, as well as monitoring for supplier compliance with the Supplier Code of Conduct



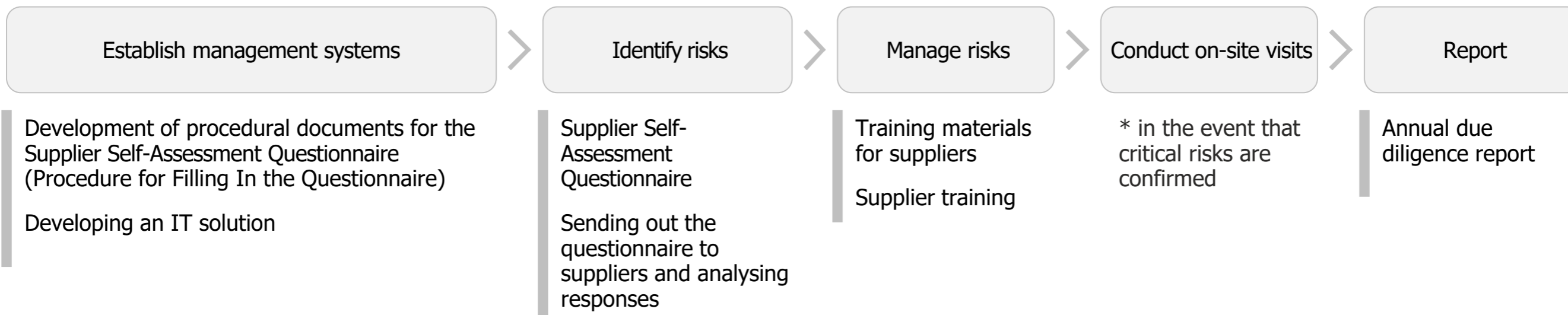
1. CAHRA – Conflict-Affected and High-Risk Areas.



Nornickel's Due Diligence Management System process (3/3)

Responsible supply chain

The Due Diligence Management System enables comprehensive due diligence of suppliers against ESG criteria, **including human rights**, as well as monitoring for supplier compliance with the Supplier Code of Conduct



planned

Further information on human rights at Nornickel



Nornickel's
Sustainability Report 2021



Nornickel's
Annual Report 2021



Human rights (website)

