

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. In April, 2019 a merger was completed with joint-stock company Petersburg Central Registrar Company. 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
- › Registration of issues of shares during initial offering by Joint-Stock Companies, and secondary offerings under closed subscriptions.

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 improved 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, JSC Okeanpribor Concern, 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 52 representative offices located in 47 regions, stretching from Kaliningrad to Kamchatka.

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

- > 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:

- > 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
- > National Settlement Depository's Registrars and Depository Engagement Committee
- > RSPP Committee on Corporate Relations
- > RSPP Commission on Public Utility
- > Central Depository User Committee

Since 2013, IRC – R.O.S.T. has been consistently ranked on top of the key national ranking of registrars published by the Infrastructure Institute Fund for Financial Research in cooperation with PARTAD. The company received the top spot in the independent ranking of registrars conducted by the National Rating Agency.