



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 Human Rights Policy

1. Scope

This Human 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 MMC Norilsk Nickel (hereinafter, the Company) and the Norilsk Nickel Group business units (hereinafter collectively referred to as the Group) regarding human 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 restrictions and requirements of applicable law.

2. General Information

The Company respects human rights and freedoms in accordance with the recognized standards, principles, initiatives and provisions of international law, and operates under the regulations set forth in the Russian Federation and other countries across the Company's footprint.

Implementation of this Policy shall contribute to the prevention or mitigation of human rights violations by the Company businesses, as well as along the entire supply chain.

The text of the Policy is available to all stakeholders on the Company's website. The Company is also proactively communicating the Policy to stakeholders using other relevant communication channels.

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

3. Statutory Framework

3.1. The Company is guided by the federal and regional laws of the Russian Federation, the laws of other countries within the Company's footprint, and the

recognized Russian¹ and international standards² with regard to stakeholder engagement. The Policy also takes account of and is based on the UN Universal Declaration of Human Rights, the UN Declarations, the International Labor Organization's (ILO's) Conventions, the UN Sustainable Development Goals (SDG), International Finance Corporation's (IFC's) Performance Standards on Environmental and Social Sustainability, the UN Guiding Principles on Business and Human Rights (UNGP), 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:

- Business Ethics Code of PJSC MMC Norilsk Nickel;
- Equal Opportunities Programme
- Working Conditions Policy
- Freedom of Association Policy of PJSC MMC Norilsk Nickel
- Local Community Relations Policy of PJSC MMC Norilsk Nickel;
- Indigenous Peoples' Rights Policy and other policies of PJSC MMC Norilsk Nickel.

4. Commitments and Principles

Recognizing the risks of adverse human rights impact and conflict associated with the extraction, trade, processing and export of raw materials from conflict-affected and high-risk areas, the Company and Russian business units within Norilsk Nickel Group (hereinafter referred to as NN RBUs) will neither tolerate nor contribute to or profit from any forms of human rights violation.

Labor Rights

4.1. The Company and NN RBUs do not use and will not tolerate the use of any forms of modern slavery across its supply chain, including forced or bonded labor, or human trafficking.

4.2. The Company and RBUs NN do not use child labor, i.e., labor performed by a person less than 18 years of age, at its hazardous production facilities, and do not engage persons less than 15 years of age to work at non-hazardous production facilities. The Company and NN RBUs undertake to engage all stakeholders, including government agencies, to eradicate child labor in operations related to raw materials extraction, processing and sale, if such violations occur.

4.3. If child labor is found to be used in production, the Company and NN RBUs shall remove the child from production operations and shall contribute, to the extent possible, to providing the child with access to activities appropriate for the child's age, specifically, education.

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/or 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.

4.4. The Company and NN RBUs create a safe and comfortable working environment where every employee is treated fairly and respectfully, and where the employees can fully use their skills and capabilities, contribute to business development and realize their potential to the fullest.

4.5. The Company and NN RBUs guarantee fair and satisfactory compensation to employees that ensures dignified existence for the employee and their family, with other additional social security means added as necessary.

4.6. The Company and NN RBUs recognize the right of their employees, workers, suppliers and counterparties to personal and family privacy, honor and dignity protection, to protection of personal data and preventing its transfer to third parties without their consent.

4.7. The Company and NN RBUs guarantee respect of the right to rest and leisure, including the right to reasonable work day limitation and paid periodic leave as per the labor legislation and the collective bargaining agreement.

4.8. The Company and NN RBUs recognize the right of their employees to freedom of associations, setting up professional unions and joining them to secure protection of their interests, and respects the employees' collective bargaining rights.

4.9. The Company and NN RBUs strive to secure protection of their employees against any manifestations of physical, verbal, sexual or psychological abuse, aggression or threats in the workplace from colleagues or management.

Non-Discrimination

4.10. Employees of the Company and NN RBUs are aware that they must treat their colleagues and job candidates with respect, and shall not tolerate discrimination based on a person's race, skin colour, gender, age, origin, language, religion, disability, political preferences, or based on any other grounds.

4.11. The Company and NN RBUs promote and support the freedom of opinion and belief without any discrimination.

4.12. The Company and NN RBUs will not tolerate discrimination against women in any form by any person, organization or business.

4.13. The Company and NN RBUs shall grant men and women equal rights and opportunities as per the labor laws of the countries where it operates.

4.14. The Company and NN RBUs prohibit discrimination against women, and prohibit (and will apply sanctions against) employee dismissal or discrimination based on pregnancy or marital status. The Company and NN RBUs maintain a responsible approach to the observance of women's rights across its businesses to mitigate health risks.

4.15. The Company and NN RBUs strive to provide to people with disabilities accessible information regarding the means, devices and assistive technologies facilitating their mobility, including new technologies, and other forms of assistance to create comfortable and equal workplace conditions.

4.16. The Company and NN RBUs guarantee that it will provide its employees with indiscriminate opportunities to training and development, including provision of time, equipment and training opportunities as required.

Working Conditions and Health

4.17. The Company and NN RBUs provide safe working conditions consistent with the sanitary requirements, standards and best practices, and requires that its suppliers, contractors and subcontractors do the same.

4.18. By adopting the employees' safety and health as the core value, the Company and NN RBUs guarantee that no production operation is to be performed unless it can be performed in a safe manner.

4.19. If an employee believes that an operation cannot be performed without a risk to their life and health, and the lives and health of their colleagues, the employee shall discontinue such operation and notify their line manager of the danger. The Company and NN RBUs guarantee that the employee having reported danger and discontinued work will not be subject to disciplinary action or other pressure.

4.20. The Company and NN RBUs perform regular reviews of workplace conditions by conducting a special working conditions assessment, assessment of professional risks and production control.

4.21. The Company and NN RBUs inform the employees of any dangers their work is related to, including health risks, and preventive and protection means.

4.22. The Company and NN RBUs ensure safe transportation, storage and use of chemical agents, physical and biological substances, and will take all requisite actions to maintain the employees' health.

4.23. The Company and NN RBUs maintain ongoing consultations with their employees and the representatives of such employees on securing safe working conditions.

Security Arrangements

4.24. If a production facility is located in an area with a high risk of conflicts or where a conflict may arise, the Company and NN RBUs promise to deny support to any parties capable of violating human rights or creating a human rights conflict.

4.25. The Company and NN RBUs will not tolerate any direct or indirect support to public or private security forces, non-state armed groups or their affiliates, who may be involved in illegal taxing or extortion, within the Company's production operations or supply chain.

4.26. If state-run or private security agencies are contracted to maintain security and protect the production facilities, the Company and NN RBUs shall be guided by the Voluntary Principles of Security and Human Rights and expect their suppliers across the entire supply chain to do the same.

4.27. The Company and NN RBUs will not tolerate the use of force, including use of fire arms or a disproportionate threat from in-house, private, or state-owned security services.

Local Communities and Minor Indigenous Peoples

4.28. The Company and NN RBUs identify groups of stakeholders, including local communities and minor indigenous peoples (MIP), and foster long-term relations with them based on respect and trust to promote mutual benefit and well-being.

4.29. The Company and NN RBUs assess their impact on the social sector and manage social risks arising throughout the entire business lifecycle, from the opening of new production sites to production facilities shutdown.

4.30. The Company and NN RBUs hold consultations with external stakeholders throughout the life cycle of their production divisions in order to prevent or minimize adverse impacts, taking into account the opinions of local communities and the MIP when making decisions that influence their lives and ensuring timely feedback.

4.31. The Company and NN RBUs shall respect the rights of minor indigenous peoples and avoid non-voluntary physical or economic relocation of families and communities.

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

4.33. The Company and NN RBUs do not practice the use of force or coercion in any form violating human rights and key freedoms of minor indigenous peoples and local population.

4.34. The Company and NN RBUs recognize each person’s right to a favorable environment, reliable information about its condition and compensation of damage caused to their health or property by environmental violations.

4.35. The Company and NN RBUs take actions to prevent and eliminate human rights violations across its businesses and departments. The Company and NN RBUs shall identify, and having identified, assess the degree of a human rights violation related to the Company’s operations, mitigate it and where necessary, compensate for the damage.

4.36. The Company and NN RBUs shall provide to stakeholders access to an application submission and review mechanism allowing to settle and providing legal remedy against complaints and proposals related to the Company, NN RBUs, and their operations. Applications may be submitted with the indication of the applicant’s personal data or anonymously. The Company and NN RBUs will not tolerate any punishment, disciplinary action or vengeance against any persons sharing their concerns and providing assistance in the investigation.

5. Governance

Management entity	Key functional responsibilities
1. Board of Directors	
The Company’s Board of Directors	Approves this PJSC MMC Norilsk Nickel Human Rights Policy, as well as amendments hereto. Approves the Group’s Sustainability Report, including with regard to human rights observance and protection
PJSC MMC Norilsk Nickel Board of Directors’ Sustainability and Climate Change Committee	Provides to the Board of Directors opinions on the assessment of the efficiency and quality of key human rights projects development and implementation. Monitors the quality and efficiency of implementing material amendments to the approved strategies,

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

	<p>goals, programs, projects and other significant human rights initiatives.</p> <p>Prepares recommendations for the Board of Directors on achieving compliance with regulatory or legislative enactments, requirements of human rights standards and associations.</p>
2. Management Board	
PJSC MMC Norilsk Nickel Management Board	Reviews the Group's Sustainability Report, including with regard to human rights observance and protection
PJSC MMC Norilsk Nickel Management Board's Risk Management Committee	<p>Monitors the key human rights risks, including those identified in stakeholder engagement.</p> <p>Ensures that appropriate response measures are in place to address the said key risks.</p> <p>Drafts recommendations for PJSC MMC Norilsk Nickel Management Board with regard to the key human rights risks, including those identified while interacting with the stakeholders.</p>
3. The Company's Head Office Departments	
Senior Vice President for Sustainable Development	<p>Develops, monitors and coordinates the implementation of the Company's sustainable development policy.</p> <p>Monitors the internal procedures, policies, organizational structure and business processes of the Company to establish compliance with the international standards on sustainable development and requirements of the international human rights associations and certifications.</p>
Sustainable Development Department	<p>Develops and implements the Sustainable Development Policy, including with regard to human rights observance and protection.</p> <p>Participates in monitoring and analyzing changes in legislation and recognized international standards related to sustainable development, including those related to the human rights, to ensure consistency with the Company's policies and practices.</p> <p>Provides methodological support for compliance with recognized international sustainable development standards, including with regard to human rights observance and protection.</p> <p>Conducts stakeholder analysis for their inclusion in the Stakeholder Engagement Plan (SEP) on human rights observance and protection.</p> <p>Prepares an annual consolidated SEP, including with regard to human rights observance and protection.</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 human rights observance and protection in the Group's financial reports.</p> <p>Prepares and certifies the disclosed financial indicators relating to stakeholder engagement, including with regard to the human rights observance and protection.</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 the opinions of the stakeholders affected by the Company's operations are taken into account.</p> <p>Analyses the matters considered during respective activities jointly with the stakeholders' representatives, the results of stakeholder engagement and assumed obligations.</p> <p>Participates in human rights risk management within its functional responsibility area.</p> <p>Participates in considering and settling complaints/inquiries from stakeholders as part of its functional responsibility area.</p>
Occupational Health and Safety Department	<p>Controls compliance with the H&S regulations and internal requirements.</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>
Corporate Security Department	<p>Organises and controls safety and security, monitors the social situation at the Company's production</p>

	<p>divisions and takes part in organising activities to promote work team stability.</p> <p>Controls and coordinates the activities of security companies contracted to provide security of the Company and the NN RBUs.</p> <p>Participates in human rights risk management within its functional responsibility area.</p> <p>Participates in reviewing and resolving stakeholder complaints/requests and in organising and conducting internal investigations within its functional responsibility area.</p>
Marketing Department	<p>Evaluates the influence of risks and opportunities relating to stakeholder engagement on the Company's marketing activities, including with regard to human rights observance and protection.</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>
Investor Relations Department	<p>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.</p>
Environmental Department	<p>Participates in the engagement with stakeholders with regard to the issues relating to the environment, climate change, water management, biodiversity preservation, waste management, air and soil condition, restoration and/or compensation of adverse environmental impact in the location areas of the Company's hazardous production facilities.</p> <p>Participates in human rights risk management within its functional responsibility area.</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>

		Participates in considering and resolving stakeholder complaints/requests within its functional responsibility area.
HR Department		<p>Controls the delivery and monitors the current corporate social programs falling within the competence of the Department, for the employees of the Company and the NN RBUs.</p> <p>Participates in interactions with government authorities, workers and other stakeholders on the matters of the corporate policy on labor organizations, salary, personnel incentives and corporate social programs that fall within the Department's competence.</p> <p>Participates in human rights risk management within its functional responsibility area.</p> <p>Participates in considering and settling complaints/applications from stakeholders as part of its functional responsibility area.</p> <p>Organizes and conducts training for employees with regard to human rights observance and protection.</p>
Risk Management Service		<p>Monitors delivery of actions aimed at managing the key risks, including those identified while interacting with the stakeholders with regard to human rights observance and protection.</p> <p>Develops overall corporate methodological approaches and principles related to risk management.</p> <p>Provides PJSC MMC Norilsk Nickel Management Board's Risk Management Committee with consolidated information on managing the key risks, including those identified while interacting with the stakeholders with regard to human rights observance and protection.</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>
Internal Audit Department		Conducts an internal independent audit of the risk management system efficiency, including with regard to human rights observance and protection.
Public Relations Department	Relations	Interacts with the Company's departments when publishing information related to stakeholder engagement on the Company's corporate website.
Internal Department	Control	Accepts complaints/applications related to stakeholder engagement received by the Corporate Trust Service

	<p>(CTS), determines the authenticity, analyses and processes incoming information.</p> <p>Organizes and conducts audits of complaints/applications related to stakeholder 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 mechanism for submitting and considering applications.</p>
4. Company's Production Divisions and Business Units within the Norilsk Nickel Group	
<p>NN BUs and the Company production divisions</p>	<p>Participate in stakeholder engagement, including with regard to human rights observance and protection, and in implementing actions and initiatives to mitigate and manage the human rights risks identified during stakeholder engagement.</p> <p>Participate in the human rights risk management within their functional responsibility area.</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 assessing the implementation hereof:

- 6.1. Monitors the implementation of the annual SEP and its results.
- 6.2. Analyses human rights activities for reporting purposes in accordance with the International Council on Mining and Metals (ICMM) Guide.
- 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 human rights activities in the Company's Sustainability Report and 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 takes into account the UN Global Compact and the UN Guiding Principles on Business and Human Rights for drafting the reporting documents on its stakeholder engagement activities.

8. Liability

The Senior Vice President for Sustainable Development is liable for late introduction of amendments and supplements hereto.

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:

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

10.1.2. **Discrimination** means violation of rights, freedoms and legitimate interests of people and citizens, giving advantages based on one's gender, race, skin colour, nationality, language, ethnicity, property, family, social and official status, age, place of residence, attitude to religion, beliefs, membership or non-membership in public associations or any social groups, as well as other circumstances unrelated to the business qualities of an employee.

10.1.3. **Stakeholders** means the individuals and legal entities, as well as 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.

10.1.4. **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 them 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,

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

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 legislation.

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

10.1.7. **Underprivileged Communities** means any group or part of the 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
NN RBUs	Norilsk Nickel Group Russian business units
CTS	Corporate Trust Service
GRI	Global Reporting Initiative
ICMM	International Council on Mining and Metals
IFC	Environmental and Social Performance Standards (the Environmental and Social Performance Standards of the 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

⁶ As defined by the World Health Organization.