

Commitment to human rights

UNGPs RF A.1.1, CHRB A.2.1

Statement of the Chairman of the Board of Directors

We are living in an era where corporate responsibility – to society, the environment, and each individual – is becoming a key driver of long-term sustainability for a business. At Nornickel, respect for human rights is not just an obligation but a core value that underpins our corporate culture, informs our decisions, and guides our actions.

In 2024, as part of our ongoing efforts to strengthen the human rights due diligence system, we developed a methodology for assessing integrated human rights risk and launched a dedicated training programme for Group employees.

We remain firmly committed to advancing our social programmes and delivering on the goals of our 2030 Socially Sustainable Development Strategy, with a strong focus on enhancing employee well-being. In 2024, we allocated a record RUB 6 billion to the Made with Care programme, significantly improving workplace amenities for our employees. Equally important is fostering an environment that supports both professional development and personal growth. The Company operates

a comprehensive continuous learning system, further expanding its medical support initiatives, including access to health resort treatment. We are also continuing our Digital Investor project, which promotes employee engagement and improves financial literacy.

The Company places particular emphasis on the development of its host cities. The large-scale renovation of Norilsk is underway, with more than RUB 80 billion planned in investments by 2035. The programme includes the construction of new residential housing as well as social, cultural, and infrastructure facilities. We are also deepening our engagement with indigenous minority peoples. Updated in 2024, our corporate Policy of Engagement with Indigenous Small-Numbered Peoples is aligned with recognised international standards.

All of these efforts are aimed at ensuring the sustainable development of Nornickel and strengthening our social licence to operate. And in this milestone year – our 90th anniversary – we wish to express our heartfelt gratitude to all our employees, partners, and local communities for their continued support and contributions to our shared initiatives.

Nornickel's policy statement on human rights

CHRB A.1.3.b

For more details, please see the [Nornickel's Human Rights Due Diligence Procedure](#) section.

Nornickel complies with the national laws of the Russian Federation while adhering to international standards and corporate best practices in upholding and protecting human rights. The Company has implemented and continues to enhance its human rights due diligence system.

The Company is committed to providing a safe and comfortable working environment for everyone, fostering equitable engagement among employees, suppliers, partners, and other stakeholders.

Nornickel's public policy statement on human rights

Nornickel is committed to upholding the principles of equality, fairness, and respect for every individual's human rights. The Company does not tolerate any form of discrimination and prohibits the use of forced or child labour, both in its operations and throughout its supply chains. All employees – regardless of gender, ethnicity, place of residence, social status, age, beliefs, or any other factors not related to their professional abilities – are provided with equal opportunities to exercise their labour rights and realise their career potential.

The Company does not operate in, nor does it source raw materials from, conflict-affected or high human rights risk areas.

Nornickel adheres to high standards of business ethics and expects its suppliers, contractors, and partners to take a similar responsible approach to human rights compliance. For more details, please see the [2024 Responsible Supply Chain Report](#).



Our values¹

People are the Company's key value. Throughout its operations spanning nine decades in the Far North, Nornickel has built distinctive professional expertise that enables the Company to effectively navigate challenges of unprecedented scale and complexity while maintaining the highest standards of product quality.

These statements are consistent with Nornickel's values



Efficiency

The Company's primary aspiration and a driving force behind the development of each employee's professional qualities



Safety

A fundamental priority shared by the Company and all employees



Care for people

The cornerstone of collaboration and interaction within our teams

¹ For more details on our corporate values, please see the link below: <https://nornickel.ru/upload/iblock/buklet-po-cennostyam-181124.pdf>.

Key human rights initiatives and declarations guiding Nornickel activities

Generally recognised international and Russian declarations, guidelines, and initiatives	Russian legislation	Practical recommendations	Industry-specific initiatives
<ul style="list-style-type: none">• UN Universal Declaration of Human Rights• UN Global Compact• ILO Declaration on Fundamental Principles and Rights at Work• International Labour Organization Conventions• OECD Guidelines for Multinational Enterprises• Social Charter of Russian Business	<ul style="list-style-type: none">• Constitution of the Russian Federation• Labour Code of the Russian Federation• Federal Law No. 82-FZ, On the Minimum Wage, dated 19 June 2000; Federal Law No. 82-FZ, On Safeguarding the Rights of Indigenous Minorities of the Russian Federation, dated 30 April 1999; and other federal laws and regulations	<ul style="list-style-type: none">• UN Guiding Principles on Business and Human Rights (UNGPs)• Guide for Integrating Human Rights into Business Management (UN Global Compact)• International Finance Corporation's (IFC) Performance Standards on Environmental and Social Sustainability• Voluntary Principles on Security and Human Rights (VPSHR)• GRI Sustainability Reporting Standards	<ul style="list-style-type: none">• Initiative for Responsible Mining Assurance (IRMA)• ICMM's Mining Principles

List of human rights priorities



UNGPs RF A1.2, UNGPs RF A2.2, UNGPs RF B1, UNGPs RF B2

Guided by international standards and industry practices, and considering its operational profile, the Company has identified the key human rights that merit particular attention. These rights are applicable to Nornickel employees, local community members, and employees of the Company's suppliers.

Key human rights across Nornickel's operations

Affected stakeholder groups	Company employees	Local communities	Contractor employees
Human rights area	<p>Fundamental rights</p> <ul style="list-style-type: none">• Right to life• Right to liberty• Right to privacy and security of person• Right to freedom of movement• Right to a healthy environment <p>Labour rights</p> <ul style="list-style-type: none">• 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 <p>Rights to occupational health and safety</p> <p>Rights to freedom of association and collective bargaining</p> <p>Rights to the protection of family, maternity, and childhood</p> <p>Rights of employees and external stakeholders to a healthy environment</p>	<p>Rights of local and indigenous communities</p>	<p>Human rights as part of supply chain responsibility commitments¹</p>



¹ For more details on human rights as part of supply chain responsibility commitments, please see PJSC MMC Norilsk Nickel's [Human Rights Policy](#), [Supplier Code of Conduct](#), and [Responsible Sourcing Policy](#).