

Internal documents on human rights

CHRB A.1.1, A.1.2.a, CHRB A.1.2.b, UNGPs RF A2.4, UNGPs RF C1.1

Nornickel enforces its human rights policy through internal regulations designed to ensure adherence to international standards and national laws. The Company's Human Rights Policy is the key document governing its approach to protecting and promoting human rights.

Human Rights Policy

In 2021, [PJSC MMC Norilsk Nickel's Human Rights Policy](#) was updated and approved by the Company's Board of Directors.

PJSC MMC Norilsk Nickel's Human Rights Policy is the key document outlining the Company's principles, commitments, and mechanisms for protecting and upholding human rights. The Policy primarily aims to ensure compliance with Russian laws and regulations while also striving to uphold the principles and provisions of the Universal Declaration of Human Rights, ILO Conventions, the UN Guiding Principles on Business and Human Rights (UNGPs), and other recognised international standards, in order to prevent or minimise human rights violations across the Company's operations and supply chain.

The Policy's key focus areas



PJSC MMC Norilsk Nickel's Human Rights Policy is supported by other internal regulations, which cover a broad range of rights and interests of all stakeholder groups, including:

- [Business Ethics Code of PJSC MMC Norilsk Nickel;](#)
- [Equal Opportunities Programme;](#)
- [Working Conditions Policy;](#)

- [PJSC MMC Norilsk Nickel's Freedom of Association Policy;](#)
- [PJSC MMC Norilsk Nickel's Community Engagement Policy;](#)
- [Policy of Engagement with Indigenous Small-Numbered Peoples.](#)

UNGPs RF A1.1

The Policy is reviewed by the Company's Board of Directors on a regular basis. No amendments were made to the Human Rights Policy in 2024. The current version of the Policy fully reflects Russian legislation, up-to-date international standards, and the Company's corporate commitments.



Impact of human rights risks on the Company's strategy and business model

CHRB A.2.4

When social aspects of operations, including those related to human rights, pose significant risks or have implications for the Company's operational resilience and business reputation, corporate governance bodies may initiate adjustments to the corporate strategy and, in some cases, even to the Company's business model and production chain.

The revision process may be initiated either by management, with proposals developed and submitted to the Board of Directors for approval, or by the Board of Directors, which may issue proposals as formal recommendations for subsequent implementation by management.

Nornickel's 2030 socially sustainable development strategy

One example is the adoption of the Socially Sustainable Development Strategy in 2023, which is guided, among other things, by the principles of the Company's Human Rights Policy and the Business Ethics Code. The document outlines the Company's key development areas in social responsibility. The strategy covers four priority areas that support both the Company's long-term development and broader societal progress, all of which are directly related to human rights: health and safety, talent management and corporate culture, development of technologies and products that help foster technological and social progress, and involvement in the lives of local communities and society at large. Risks associated with occupational safety, workforce shortages, and engagement with local communities prompted the Company to adopt a strategic document with a long-term planning horizon.

[For more details, please see Nornickel's 2024 Sustainability Report.](#)

Sulphur Project

Another example is the decision to implement the large-scale Sulphur Project aimed at dramatically reducing sulphur dioxide emissions across the Company's footprint, as health risks to local communities were assessed as high. As a result, this project has been included in both the Company's long-term development strategy and its environmental strategy. Since this ambition could not be achieved otherwise, the Company revised its business model and production chain accordingly. A number of production facilities on the Kola Peninsula were shut down, and the associated logistics flows were redirected. For more details on the implementation of the Sulphur Project and the associated process, please see the Company's 2019–2024 Sustainability Reports.