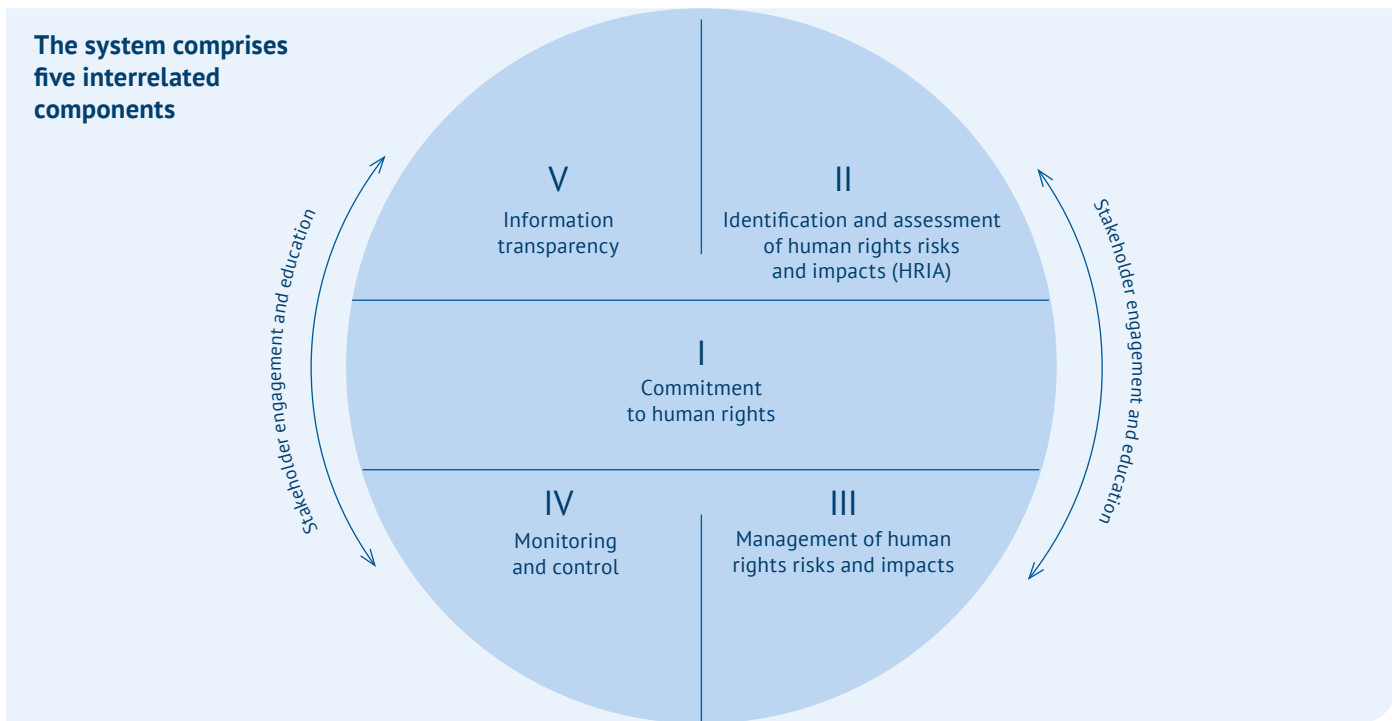


# Nornickel's human rights due diligence procedure

The human rights due diligence system in place at Nornickel is aligned with international standards and guided by the UN Guiding Principles on Business and Human Rights (UNGPs).

## Nornickel's human rights due diligence system



**I. Commitment to human rights** is outlined in the [Company's Human Rights Policy](#), which outlines the fundamental principles of the Company's activities, commitments, and initiatives in upholding and protecting human rights. Alongside the Policy, the Company applies other corporate documents that cover human rights and the Company's commitments to specific groups of right holders.

**II. Identifying and assessing human rights risks and impacts** is a complex process that forms the basis for making a list of priority human rights risks and impacts across the Company's business units, followed by the implementation of appropriate corrective actions.

**III. Human rights risks and impacts are managed** based on assessments conducted at the level of business units identified as having the highest risk of human rights violations.

**IV. Monitoring and control** are carried out by the Sustainable Development Department based on information provided by the Company's business and other units regarding the measures implemented and results achieved in mitigating human rights risks.

**V. Information transparency** is ensured through responses to stakeholder queries regarding the upholding and protection of human rights as well as through the publication of corporate sustainability reports and human rights reports.

## What was done in 2021–2024 as part of the human rights due diligence system?

1

Between 2021 and 2024, Nornickel adopted a number of key internal regulations, including the Human Rights Policy and the Stakeholder Engagement Policy adopted in 2021 as well as the Policy of Engagement with Indigenous Small-Numbered Peoples updated in 2024. These documents were approved by the Board of Directors and formally set out the Company's commitment to the principles of upholding and protecting human rights

2

Dedicated corporate documents, including a human rights classification and methodology, were developed to systematise and standardise the Company's approach to identifying potential risks and impacts

3

A significant step in the development of the due diligence system was the first human rights risk assessment conducted in 2022, covering aspects such as the right to health, the right to work, protection from forced labour, the right to life, and fair and adequate remuneration

4

The Company assessed its human rights index for the first time, based on an analysis of responses from engagement surveys. Survey findings are a key tool for assessing integrated human rights risk

5

The first dedicated human rights courses were launched for all Company employees, including security personnel in particular

6

Two public standalone human rights reports for 2022 and 2023 were released. This Report is the Company's third report reflecting the progress accumulated in this area

## Improvements to the human rights due diligence system in 2024

The Company continues improving its human rights practices, regularly assessing its progress. The following was developed in 2024:

Classification of reports and complaints	Methodology for assessing integrated human rights risk	Risk assessment at the Group entity level
The Corporate Trust Line was expanded to include a query classification tool. Each incoming query is assigned an appropriate category and subcategory depending on its topic and the human rights potentially involved	A human rights risk assessment system was developed. The system incorporates an analysis of queries received via the Corporate Trust Line, the results of the Let Everyone Be Heard engagement survey, and non-financial reporting data	Integrated risk is assessed individually for each of the Group's production facilities, allowing for the prioritisation of areas where corrective and mitigating measures should be developed and implemented in relation to: <ul style="list-style-type: none"> <li>Group entities with the highest human rights risks;</li> <li>human rights most frequently exposed to violation risks across the Company as a whole;</li> <li>processes that require systemic change</li> </ul>

Nornickel not only consistently strengthens its internal human rights processes but also demonstrates high standards in its external practices. In 2024, the Company earned a finalist finish in the MINEX Forum's Russian Mining Excellence Awards, in the Sustainability Project category, for developing a human

rights due diligence system. This achievement reflects the results of its comprehensive efforts to integrate risk assessment and management tools, enhance the transparency of internal processes, and actively engage with employees and stakeholders.