

# Indicators under the corporate human rights benchmark (CHRB)

Indicator	Section/Comment	Page
<b>A: Governance and policy commitments</b>		
<b>A.1. Policy commitments</b>		
A.1.1. Commitment to respect human rights	Internal Documents on Human Rights	<a href="#">10</a>
A.1.2.a. Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	Internal Documents on Human Rights. For more details, please see MMC Norilsk Nickel's Human Rights Policy	<a href="#">10</a>
A.1.2.b. Commitment to respect the human rights of workers: Health and safety and working hours	Internal Documents on Human Rights. For more details, please see MMC Norilsk Nickel's Human Rights Policy	<a href="#">10</a>
A.1.3.a. Commitment to respect human rights particularly relevant to the sector: Land, natural resources, and indigenous peoples' rights	Rights of Indigenous Peoples. For more details, please see MMC Norilsk Nickel's Human Rights Policy	<a href="#">34</a>
A.1.3.b. Commitment to respect human rights particularly relevant to the sector: Security	Commitment to Human Rights	<a href="#">6</a>
A.1.4. Commitment to remedy	Corporate Trust Line	<a href="#">21</a>
A.1.5. Commitment to respect the rights of human rights defenders	Corporate Trust Line	<a href="#">21</a>
<b>A.2. Board level accountability</b>		
A.2.1. Commitment from the top	Governance Structure, Responsibilities, and Oversight of Human Rights; Stakeholder Engagement	<a href="#">12</a> , <a href="#">20</a>
A.2.2. Board responsibility	Governance Structure, Responsibilities, and Oversight of Human Rights	<a href="#">12</a>
A.2.3. Incentives and performance management	Governance Structure, Responsibilities, and Oversight of Human Rights; Management of Human Rights Risks	<a href="#">12</a> , <a href="#">16</a>
A.2.4. Business model strategy and risks	Governance Structure, Responsibilities, and Oversight of Human Rights	<a href="#">12</a>
<b>B: Embedding respect and human rights due diligence</b>		
<b>B.1. Embedding respect for human rights in company culture and management systems</b>		
B.1.1. Responsibility and resources for day-to-day human rights functions	Governance Structure, Responsibilities, and Oversight of Human Rights	<a href="#">12</a>
B.1.2. Incentives and performance management	Governance Structure, Responsibilities, and Oversight of Human Rights	<a href="#">12</a>
B.1.3. Integration with enterprise risk management	Identification and Assessment of Human Rights Risks and Impacts	<a href="#">16</a>

Indicator	Section/Comment	Page
B.1.4.a. Communication/dissemination of policy commitment(s): Workers and external stakeholders	Stakeholder Engagement	<a href="#">20</a>
B.1.4.b. Communication/dissemination of policy commitment(s): Business relationships	Contribution to Upholding the Rights of Supplier Employees	<a href="#">38</a>
B.1.5. Training on human rights	Human Rights Training	<a href="#">18</a>
B.1.6. Monitoring and corrective actions	Remedies and Grievance Mechanisms	<a href="#">21</a>
B.1.7. Engaging and terminating business relationships	Contribution to Upholding the Rights of Supplier Employees	<a href="#">38</a>
B.1.8. Approach to engaging with affected stakeholders	Stakeholder Engagement	<a href="#">20</a>
<b>B.2. Human rights due diligence</b>		
B.2.1. Identifying human rights risks and impacts	Identification and Assessment of Human Rights Risks and Impacts	<a href="#">16</a>
B.2.2. Assessing human rights risks and impacts	Identification and Assessment of Human Rights Risks and Impacts	<a href="#">16</a>
B.2.3. Integrating and acting on human rights risks and impact assessments	Identification and Assessment of Human Rights Risks and Impacts	<a href="#">16</a>
B.2.4. Tracking the effectiveness of actions to respond to human rights risks and impacts	Management of Human Rights Risks	<a href="#">16</a>
B.2.5. Communicating on human rights impacts	Stakeholder Engagement	<a href="#">20</a>
<b>C: Remedies and grievance mechanisms</b>		
C.1. Grievance mechanism(s) for workers	Remedies and Grievance Mechanisms	<a href="#">21</a>
C.2. Grievance mechanism(s) for external individuals and communities	Remedies and Grievance Mechanisms	<a href="#">21</a>
C.3. Users are involved in the design and performance of the mechanism(s)	Remedies and Grievance Mechanisms	<a href="#">21</a>
C.4. Procedures related to the grievance mechanism(s) are equitable, publicly available, and explained	Remedies and Grievance Mechanisms	<a href="#">21</a>
C.5. Prohibition of retaliation for raising complaints or concerns	Remedies and Grievance Mechanisms	<a href="#">21</a>
C.6. Company involvement with state-based judicial and non-judicial grievance mechanisms	Remedies and Grievance Mechanisms	<a href="#">21</a>
C.7. Remedying adverse impacts	Remedies and Grievance Mechanisms	<a href="#">21</a>
C.8. Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	Corporate Trust Line	<a href="#">21</a>

<sup>1</sup> In own extractive operations, which includes JVs.

Indicator	Section/Comment	Page
<b>D: Company human rights practices</b>		
D.3.1. Living wage <sup>1</sup>	Key Figures of the Report	<a href="#">2</a>
D.3.2. Transparency and accountability <sup>1</sup>	Nornickel discloses production results and accounting statements prepared under the RAS and IFRS on the Company website	
D.3.3. Freedom of association and collective bargaining <sup>1</sup>	Respecting Employee Rights (the Collective Bargaining Agreement subsection)	<a href="#">28</a>
D.3.4. Health and safety: Fatalities, lost days, injury, occupational disease rates <sup>1</sup>	Respecting Employee Rights (the Health and Safety subsection)	<a href="#">29</a>
D.3.5. Indigenous peoples’ rights and free prior and informed consent (FPIC) <sup>1</sup>	Rights of Indigenous Peoples	<a href="#">34</a>
D.3.6. Land rights: Land acquisition <sup>1</sup>	The Company lends and acquires land plots for production and administrative buildings and its operations in general. Nornickel focuses on the consistent rehabilitation of all land affected by construction, mining, and emissions caused by its operations, and carries out regular audits of plant and mine closure plans. For more details, please see Nornickel’s 2024 Sustainability Report	
D.3.7. Security <sup>1</sup>	Respecting Employee Rights (the Health and Safety subsection)	<a href="#">29</a>
D.3.8. Water and sanitation <sup>1</sup>	In 2024, no major impact of Nornickel’s operations on water bodies was identified; water withdrawal was within the pre-approved limits. The Company has in place water stewardship goals for the future (e.g. keeping water recycling and reuse rates above 80%). To reduce its environmental impact, the Company implements environmental initiatives and programmes (e.g. the maintenance and operation of the auxiliary fleet which serves to prevent river water contamination)	
D.3.9. Women’s rights <sup>1</sup>	Respecting Employee Rights (the Maternity and Childhood Protection subsection)	<a href="#">28</a>
<b>E: Response to serious allegations</b>		
E.1. The company has responded publicly to the allegation	There were no serious allegations against the Company in the reporting year	
E.2. The company has investigated and taken steps to prevent re-occurrence		
E.3. The company has engaged with affected stakeholders and taken appropriate actions to provide for or cooperate in remedy(ies)		

<sup>1</sup> In own extractive operations, which includes JVs.



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**Review**  
**by the UN Global Compact Network Russia**  
**for MMC Norilsk Nickel’s 2024 Human Rights Report**

The release of Nornickel’s Human Rights Report carries particular importance amid current global challenges and Russia’s evolving national priorities. In a world grappling with numerous conflicts resulting in various forms of human rights violations, while economies face a period of turbulence testing their resilience, socially responsible business conduct is evolving from being a mere component of corporate ethics into a strategic driver of sustainable growth.

Russia upholds internationally recognised human rights principles as ratified in its international treaties and, like many other nations, pursues its national sustainable development goals, including the promotion of decent work, environmental protection, and support for indigenous peoples.

For Nornickel, the Report’s publication is an opportunity not only to reaffirm its commitment to international standards but also to boost its reputation among investors, partners, and broader society. This is already the third Human Rights Report prepared by the Company in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs) and the Corporate Human Rights Benchmark (CHRB). In the Report, the Company also reflects and discloses its contribution to advancing Russia’s national projects.

The Company’s approach to upholding the rights of the indigenous peoples of the North deserves special recognition. Nornickel rolls out best practices across areas of traditional nature use, including the application of the free, prior, and informed consent (FPIC) procedure in strict compliance with international standards (ILO Convention No. 169, UN Declaration on the Rights of Indigenous Peoples). This approach allows Nornickel not only to comply formally with legal requirements but also to build partnerships with local communities through:

- regular consultations with indigenous communities throughout the project implementation period
- creation of special development foundations and support for traditional trades
- educational initiatives and programmes to preserve cultural heritage
- transparent grievance and remediation mechanisms.

To strengthen its contribution to the human rights agenda, we recommend that Nornickel more actively involve independent experts in assessing its operations, expand engagement with international organisations, and increase disclosure around corporate supply chain due diligence procedures, environmental impacts, and impacts on local communities. This review itself serves as an example of expert engagement, demonstrating the value of external assessments. Taking such steps will help enhance stakeholder confidence in the Company’s reporting and overall activities, reinforcing its position as a leader in corporate social responsibility.

In the current environment, publishing a human rights report is not merely a reporting exercise but a vital step towards building a sustainable, socially oriented business model. By aligning with international standards and embracing national priorities, Nornickel enhances its own reputation while fostering greater trust in Russian business both domestically and internationally. This commitment is reflected in the Ten Principles of the UN Global Compact, which cover human rights, labour, environment, and anti-corruption. Such an approach is particularly meaningful in today’s global context, highlighting the Company’s relentless focus on advancing the sustainability agenda and its commitment to corporate social responsibility, where the principle of caring for people is embedded as a top priority across all business processes and partnerships. Importantly, responsible