

Grievance mechanism

CHRB C.2, CHRB B.1.6

The grievance mechanism is a corporate tool aimed at ensuring a transparent process for filing, reviewing, and addressing complaints related to the Company's operations.

CHRB C.7

The grievance mechanism is focused on both employees of Group entities and engagement with external stakeholders. Meanwhile, it does not replace the existing legal tools used to protect the interests of individuals and organisations. Participation in the procedure is at the reporting person's discretion and does not affect their right to resort to government human rights mechanisms.

The grievance mechanism procedure

CHRB C.6

The grievance mechanism offers stakeholders an additional opportunity to resolve conflicts through constructive dialogue and mediation. It provides an opportunity to address differences out of court.

CHRB C.3

Assessing the effectiveness of the grievance mechanism is a key component of the Company's corporate control system. Its operation is monitored at two levels.

Routine oversight

Implemented on an ongoing basis by analysing feedback from reporting persons and assessing the level of satisfaction with the grievance process and the results of decisions taken

In-depth analysis

Held annually as part of stakeholder consultations across the Company's footprint and through the Let Everyone Be Heard survey, designed to identify the principal challenges and expectations of local communities and partners

For more details on the grievance mechanism, please see [Nornickel's 2023 Human Rights Report](#).

<sup>1</sup> By the respective individuals or legal entities themselves; the Company does not forward reports to government authorities.

Remedies for local and indigenous communities

In 2024, the Company updated its [Policy of Engagement with Indigenous Small-Numbered Peoples](#), strengthening mechanisms for dialogue and the protection of their rights. The new policy emphasises respect for the individual and collective rights of indigenous peoples, provides for additional due diligence measures, and is based on the following approaches:

- free, prior, and informed consent of indigenous minorities in line with standards and recommendations of the International Council on Mining and Metals;
- support and development of traditional trades;
- commitment to the principle of consultations in good faith.

To manage risks related to the violation of the rights of indigenous peoples, the Company implements a dedicated due diligence procedure. As part of its efforts to enhance approaches to engagement with the indigenous small-numbered peoples of the North, Nornickel is improving its feedback and response mechanisms, focusing on establishing a sustainable, constructive, and institutionalised process. A dedicated procedure is currently being developed to provide a clearer framework for handling complaints, including provisions for involving an independent Ombudsman. This development is guided by applicable Russian laws, corporate standards, and internationally recognised principles of responsible business conduct.

