

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.

Complaints can be submitted through a variety of grievance channels: the Corporate Trust Line, offices for operational, social, and labour matters as well as direct contact with management of Company or Group entities. For the convenience of reporting persons, complaints may be submitted either in person or with the assistance of Company representatives or independent experts – a particularly important option for those who may face difficulties in filing a report on their own.

Once a complaint is received, the relevant Company unit is designated to conduct an initial review and assess whether additional information is required. If necessary, independent experts may be engaged, or the report may be referred to the relevant government authorities¹.

The Corporate Trust Line remains the primary and most accessible channel for filing complaints, ensuring timely review of reports and support for reporting persons throughout all stages of the process.

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

For more details

on the grievance

mechanism, please

see Nornickel's 2023

Human Rights Report.

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

Remedies for local and indigenous communities

In 2024, the Company updated its <u>Policy</u> of Engagement with Indigenous Small-Numbered <u>Peoples</u>, 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.



24 SUSTAINABILITY REPORT - 2024 NORNICKEL.COM

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