

# Stakeholder engagement

CHRB B.1.8, CHRB B.1.4.a, UNGPs RF A2.1, UNGPs RF C2.2

Nornickel aims to foster relationships with all stakeholders based on respect, mutual trust, and a balance of interests. The Company is guided by global best practices and standards

for responsible engagement, including the recommendations of ISO 26000:2010 and AA1000SES (2015).

## Nornickel’s internal regulations on stakeholder engagement



For more details on stakeholder engagement mechanisms, please see [Nornickel's 2023 Human Rights Report](#).

CHRB B.2.5, UNGPs RF A1.3

The Company organises dialogues, round tables, public discussions, and face-to-face meetings with stakeholders, while also creating various platforms for stakeholder engagement. In addition, Nornickel delivers educational programmes and trainings for employees and partners. Public disclosure also plays an important role: key information is published on the Company website, covered by the media, and included in public reports.

For more details on stakeholder engagement, including reports on stakeholder dialogues, please see [Nornickel's 2024 Sustainability Report](#).

By collecting feedback from meetings and events, the Company analyses the input and suggestions of stakeholders. This includes formal tools (surveys, questionnaires, expert assessments) as well as informal channels such as discussion feedback and open comments during meetings.

UNGPs RF A2.3, UNGPs RF C2.3

The results of such engagements are incorporated into the Company’s strategic documents and internal policies. In particular, the Company developed and implemented a five-year plan to promote the social and economic development of Taimyr<sup>1</sup> based on consultations with the indigenous peoples of Taimyr. In addition, several provisions of the Company’s Policy of Engagement with Indigenous Small-Numbered Peoples, updated in 2024, are informed by the preferences of indigenous community members and reflect the engagement experience gained over the past five years.

<sup>1</sup> For more details, please see Nornickel's 2020–2024 Sustainability Reports.

# Remedies and grievance mechanisms

## Corporate trust line

### Grievance policy

CHRB A.1.4, CHRB A.1.5, CHRB C.1, CHRB C.5, UNGPs RF C6.1

The Company’s Corporate Trust Line (CTL), established in 2010, is the Company’s key grievance mechanism.

A clearly structured process ensures that all submissions are reviewed objectively and impartially, with full respect for the rights of all parties involved. The Corporate Trust Line is designed to identify and prevent violations, uphold the highest standards of corporate ethics, and foster trust within the Company and among its partners.

CHRB C.4, UNGPs RF C6.2

The Corporate Trust Line covers all Company units and Group entities, enabling prompt responses to emerging challenges across the Company’s footprint and ensuring a consistent standard for handling complaints and reports.

The Corporate Trust Line is available to all stakeholders, whether they are employees, partners, customers, or representatives of external organisations. The Company investigates reports of potential violations, misconduct, or incidents that might cause financial or reputational damage. All reports are thoroughly reviewed, and any identified risks trigger appropriate corrective actions to ensure their mitigation and elimination.

### Key operating principles of the Corporate Trust Line:

- Guaranteed confidentiality for reporting persons
- Independent consideration of reports
- Timely and unbiased consideration of all reports submitted via the Corporate Trust Line

### Contacts of the Corporate Trust Line

	<a href="mailto:skd@nornik.ru">skd@nornik.ru</a>		1st Krasnogvardeysky Drive 15, Moscow, Russia, 123112, Corporate Trust Line of MMC Norilsk Nickel
	8 800 700 1941 8 800 700 1945		
	Supernika mobile app (for Nornickel employees)	<p>Information about the Corporate Trust Line is made available to employees via the intranet portal, the Company website, information screens, physical stands, posters, and payslips.</p>	
	<a href="https://nornickel.com/sustainability/corporate-hotline/">https://nornickel.com/sustainability/corporate-hotline/</a>		

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

The Company does not administer any punishments, disciplinary action, discrimination, pressure, or retaliation against individuals who voice their concerns or report identified issues. The Company guarantees that reporting persons will not face any negative consequences as a result of reporting, regardless of their position, status, or manner of cooperation.

UNGPs RF C6.3

The service is governed by the [Procedure on the Corporate Trust Line of PJSC MMC Norilsk Nickel](#), which establishes clear rules for receiving, reviewing, and processing reports. The document ensures that the reporting person is provided with a response on the decision made and, once the review process is complete, the opportunity to complete a feedback form to assess satisfaction with the handling of the report. To enhance transparency,

the Company now publishes anonymised information on the content of reports and measures taken. If a report is confirmed as justified, audits are initiated. The information is brought to the attention of relevant units and officers to ensure timely response and prevent similar cases in future.

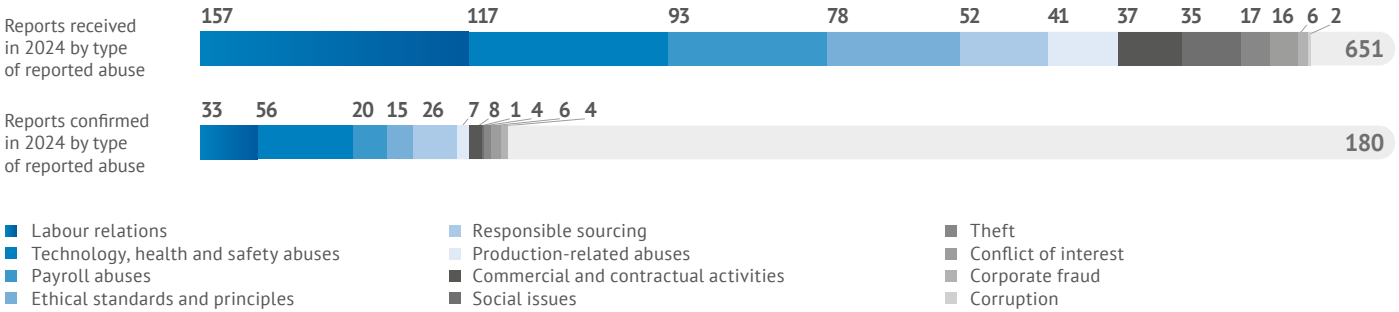
The performance of the Corporate Trust Line is reviewed annually by the Vice President – Head of Internal Control and Risk Management, including through the setting of KPIs, and is also considered at meetings of the Board's Audit Committee.

Key performance indicators of the business process:

- timely processing of complaints/reports accepted for review;
- proper processing of complaints/reports accepted for processing (number of refusals to investigate);
- timely preparation of reports on CTL performance to interested users.

CHRB C.8, UNGPs RF A2.5, UNGPs RF C6.4

Complaints/reports in 2024 by type reported



Report statistics (broken down by Group entity and type of reported abuse) are submitted to relevant Company units, with CTL performance reviewed by the Board's Audit Committee.

As part of operating the Corporate Trust Line, a reporting person is provided with feedback at all report review stages: confirmation of registration of the complaint/report (including information on standard review timelines), information on the decision taken on the report or dismissal of the complaint/report, and the results of the report's review (if requested by the reporting person). If desired, the reporting person may assess the handling of the report.

The feedback received from applicants suggests that over 90% of reporting persons are satisfied with the handling of their reports. Additional follow-up measures were taken for each unsatisfactory feedback, including with the involvement of experts from relevant functions, and follow-up communications with the reporting persons.



Employees responsible for the operation of the Corporate Trust Line

Vice President – Head of Internal Control and Risk Management

Director of the Internal Control Department

CTL head