

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

Stakeholder Engagement Policy

Business Ethics Code

Human Rights Policy

Community Engagement Policy

Policy of Engagement with Indigenous Small-Numbered Peoples

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.

UNGP's 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 Taimyr¹ 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.

¹ 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

skd@nornik.ru

8 800 700 1941
8 800 700 1945

Supernika mobile app (for Nornickel employees)

<https://nornickel.com/sustainability/corporate-hotline/>

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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.