

Indicator	Section/Comment	Page
D: Company human rights practices		
D.3.1. Living wage ¹	Key Figures of the Report	2
D.3.2. Transparency and accountability ¹	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 ¹	Respecting Employee Rights (the Collective Bargaining Agreement subsection)	28
D.3.4. Health and safety: Fatalities, lost days, injury, occupational disease rates ¹	Respecting Employee Rights (the Health and Safety subsection)	29
D.3.5. Indigenous peoples’ rights and free prior and informed consent (FPIC) ¹	Rights of Indigenous Peoples	34
D.3.6. Land rights: Land acquisition ¹	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 ¹	Respecting Employee Rights (the Health and Safety subsection)	29
D.3.8. Water and sanitation ¹	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 ¹	Respecting Employee Rights (the Maternity and Childhood Protection subsection)	28
E: Response to serious allegations		
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)		

¹ 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

disclosure of information on human rights makes a substantial contribution to the reputational capital of both Norinickel and Russia as a whole.



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Disclaimer

The information contained herein relies on the data available to PJSC MMC NORILSK NICKEL as at the date of this 2024 Human Rights Report. After this Report was prepared, the Company's operations as well as forecasts and overview of the current situation presented in the Report may have been affected by external or other factors, including:

- escalation of the geopolitical conflict in Ukraine;
- sanctions imposed by the United States, the European Union, the United Kingdom, and other nations against the Russian Federation as well as Russian individuals and legal entities;
- the Russian Federation's response to sanctions;
- economic and other measures introduced to maintain the economic and financial stability of the Russian Federation;
- other factors beyond the Company's control.

The Report discloses the Company's short-, medium-, and long-term goals and plans. All plans and intentions outlined in this Report are provisional and subject, among other things, to a number of economic, political, and legal factors, including those beyond Norinickel's control.

Forward-looking statements are subject to risks and uncertainties as they refer to events and depend on circumstances that may or may not occur in the future. Forward-looking statements are not guarantees of the Company's future operational and financial performance, and actual results of the Company's operations, its financial position, liquidity, prospects, growth, strategy, and the development of the industry in which the Company operates may differ materially from those expressed or implied by the forward-looking statements contained in this Report.

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