

System Analysis and Programme Development Governance, Risk and Compliance (SAP GRC): a SAP-based information system combining three main components – corporate governance, risk management and compliance.

Tailing dump: facility encompassing dedicated structures and equipment designed to store radioactive, toxic or other tailings resulting from the concentration process.

Top management: President, Senior Vice Presidents, Vice Presidents, members of the Management Board and heads of departments of MMC Norilsk Nickel;

directors of branches of MMC Norilsk Nickel and their deputies; sole executive bodies (directors, general directors) of the Group companies and their deputies.

Young talents: graduates of universities and colleges whose post-graduate experience does not exceed three years.

Stakeholder dialogue minutes

Nornickel has been historically engaged in dialogues with stakeholders while drafting sustainability reports. On 15 December 2022, the Company held a foresight dialogue themed “Who needs sustainable development?”¹.

Stakeholder foresight dialogue minutes:

Date and time: 15 December 2022, 10:00–12:00 am

Format: online conference

Programme:

Item 1. Report: “Nornickel’s contribution to preserving ecosystem biodiversity across its footprint. Safety culture transformation”

Item 2. Report: “Nornickel’s social strategy: goals, targets, and business priorities”

Item 3. Report: “Nornickel’s progress in addressing climate change: relevance for the stakeholders”

Item 4. Report: “Results of surveys to identify material topics for Nornickel’s 2022 Sustainability Report”

Item 5. Report: “Assessment of material topics disclosure in Nornickel’s 2021 Sustainability Report”

¹ For more details, please see the press release on the Company’s official website: <https://www.nornickel.ru/news-and-media/press-releases-and-news/v-nornikele-rasskazali-o-prioritetakh-dlya-ustoychivogo-razvitiya/type=news>. For more details on stakeholder proposals, please see the Definition of Material Topics and Stakeholder Recommendations sections.

ITEM 1. Report: “Nornickel’s contribution to preserving ecosystem biodiversity across its footprint. Safety culture transformation”

SPEAKERS:

Stanislav Seleznev

Vice President for Ecology and Industrial Safety at MMC Norilsk Nickel

Stanislav Seleznev spoke about a positive shift in the Company’s and employees’ mindset towards environmental and industrial safety.

In 2022, a number of projects were implemented in the field of preserving biodiversity, including the Big Scientific Expedition conducted in collaboration with the Russian Academy of Sciences. Such large-scale expeditions focused on biodiversity assessment had never been conducted in modern Russia before. Nornickel began to implement an agreement with the Russian Federal Agency for Fishery and has already released a substantial amount of rare and valuable fish species into water bodies. Among the unplanned activities, Stanislav Seleznev highlighted the initiative to save polar bears, which was successful. He also emphasised that Nornickel will continue to support specially protected natural areas. Stanislav Seleznev reiterated the Company’s intention to continue research in the field of biodiversity in the coming years and called on other companies to join in.

In his report, he touched upon the problem of atmospheric pollution resulting from the Company’s activities. Between 2015 and 2021, Nornickel made extensive progress as part of its Sulphur Programme and achieved a 90% reduction in sulphur dioxide emissions in its Kola Division. Two more stages of the Sulphur Programme are yet to be implemented. The first stage of them, which focuses on the sulphur dioxide recovery, has been underway at Nadezhda Metallurgical Plant for several years now. Nornickel is making every effort to launch the sulphuric acid production leveraging sulphur dioxide recovery at Nadezhda Metallurgical Plant before the end of 2023 and expects to see the first results as early as 2024. The second stage of the programme (to be implemented at Copper Plant) will be postponed due to the lack of specific technological equipment caused by the external economic and political headwinds.

Nornickel has revamped its approach and mindset towards injury prevention as part of its industrial safety management. As a

result, the ratio of accidents to fatalities changed in 2022, with the overall number of accidents almost doubling and the number of fatalities going down by more than two times. Stanislav Seleznev spoke about the start of a project to transform the Company’s safety culture. In 2022, Nornickel launched a project to train corporate coaches, who will then train the Company’s workers and engineering staff to identify and handle risks and will also help build interaction between workers and managers. Nornickel plans to continue developing the institute of corporate coaches and the safety culture, including through the use of initiatives leveraging technology.

Following Mr Seleznev’s report, additional questions were discussed about the impact of the conducted environmental research on the transformation of the Company’s environmental protection initiatives across its operations, the achievement of national sustainable development goals, and the implementation of the National Technology Initiative.

ITEM 2. Report: “Nornickel’s social strategy: goals, targets, and business priorities”

SPEAKERS:

Larisa Zelkova,

Senior Vice President – HR, Social Policy and Public Relations at MMC Norilsk Nickel

Larisa Zelkova talked about Nornickel’s new approach in the sphere of corporate social responsibly, reflected in the Company’s Sustainable Social Development Strategy. This approach covers the Company’s various projects and activities in areas that are socially significant and have public importance. Larisa Zelkova provided an overview of the most ambitious and impactful programmes that are part of

Nornickel’s wider Sustainable Social Development Strategy, such as the Norilsk renovation programme, corporate healthcare development, a special programme to provide infrastructure investment and support to indigenous peoples of the North, and a programme (named In Good Company) aimed

at developing talents and creating opportunities for employee professional and personal development.

Following Ms Zelkova’s report, additional questions were discussed on the Company’s approach to evaluating the effectiveness of social investments, the sustainability of the achieved results, the tasks set in this area, and their achievement.

ITEM 3. Report: “Nornickel’s progress in addressing climate change: relevance for the stakeholders”

SPEAKERS:

Vladimir Zhukov,

Vice President for Investor Relations and Sustainable Development at MMC Norilsk Nickel

Vladimir Zhukov highlighted the significance of the climate change topic for Nornickel and discussed the Company’s intention to follow a climate change adaptation strategy with a focus on managing physical risks. In his report, he presented global climate trends such as the transition to green energy sources, electrification of transportation, and the inevitable increase in physical risks caused by climate change.

Vladimir Zhukov shared insights into the Company’s approach to managing climate risks and provided an overview of Nornickel’s key tools for adapting to

the changing climate. In 2022, Nornickel partnered with the Obukhov Institute of Atmospheric Physics of the Russian Academy of Science to develop climate change scenarios and with experts from the Institute of Economic Forecasting of the Russian Academy of Sciences to develop long-term social and economic forecasts for the global economy. For the past two years, Nornickel has been developing monitoring systems for its buildings and structures built on permafrost, as part of its efforts to adapt to physical risks. The Company plans to equip about 1,500 facilities located in the Norilsk Industrial District with various

sensors that will transmit real-time data about any unfavourable changes in the foundations.

Following Mr Zhukov’s report, additional questions were discussed about the Company’s initiatives aimed at achieving its climate change goals and tools for assessing climate risks.

ITEM 4. Report: “Results of surveys to identify material topics for Nornickel’s 2022 Sustainability Report”

SPEAKERS:

Svetlana Ivchenko,

Head of the Sustainable Development Department of MMC Norilsk Nickel

Svetlana Ivchenko talked about the Company’s process for preparing non-financial reporting. Her report covered the reporting standards used, industry-specific standards for the metals and mining sector, as well as significant changes in the GRI standards.

Svetlana Ivchenko also discussed the changes in the process for identifying material topics, emphasising that topics are still selected based on their importance

to stakeholders and that the Company’s Sustainability Report provides a detailed and structured disclosure of these topics. Based on the results of the 2022 survey, the number of environmental topics identified as material increased, while the number of material topics related to governance decreased.

In conclusion, Svetlana Ivchenko thanked all stakeholders for their engagement with the Company, participation in surveys, and contribution to enhancing sustainable development practices at Nornickel.

Following Ms Ivchenko’s report, an additional question was discussed about the Company’s plans for implementing new non-financial reporting standards of the IFRS Foundation and the International Sustainability Standards Board (ISSB).

ITEM 5. Report: “Assessment of material topics disclosure in Nornickel’s 2021 Sustainability Report”

The participants were asked to rate the quality of the material topics disclosure in the Company’s 2021 Sustainability Report on a ten-point scale.

The participants then cast their votes.