

2022 tax payments breakdown¹ (RUB mln)

Indicator	Income tax	Mineral extraction tax	Licences and similar payments	Total
MMC Norilsk Nickel Group	68,114	66,334	23	134,471
South Cluster	4,394	5,989	0	10,383
Kola MMC Group	0	2,286	0	2,286
NN Harjavalta	137	0	0	137
GRK Bystrinskoye	112	457	0	569
Other mining businesses	546	0	0	546
Other non-metals businesses	1,172	0	0	1,172
Total	74,475	75,066	23	149,564

2022 tax payments by country (RUB mln)

Indicator	Income tax	Mineral extraction tax	Licences and similar payments	Total
Russia	73,166	75,066	23	148,255
Finland	137	0	0	137
Switzerland	1,035	0	0	1,035
Other countries	137	0	0	137
Total	74,475	75,066	23	149,564

Information on the Company's tax payments is disclosed in line with the Extractive Industries Transparency Initiative (EITI) requirements.

¹ Income tax payments are reflected in accordance with the taxpayer's belonging to the reporting segment. Income tax payments for the consolidated taxpayers group are, therefore, reflected in MMC Norilsk Nickel Group reporting segment due to the affiliation of the responsible member of the consolidated taxpayers' group to this segment. Here, MMC Norilsk Nickel Group means the operating segment which includes mining, processing and metallurgy operations, as well as transportation, energy, repair and maintenance services on the territory of the Taimyr Peninsula. Kola MMC Group means the operating segment which includes mining and processing operations, metallurgy, energy and mineral exploration operations on the territory of the Kola Peninsula. The data include Norilsk Nickel Harjavalta.

Business Ethics and Anti-Corruption

Nornickel is committed to conducting business in a transparent, honest and ethical manner. This approach is not only beneficial in building trust-based relationships with investors, partners,

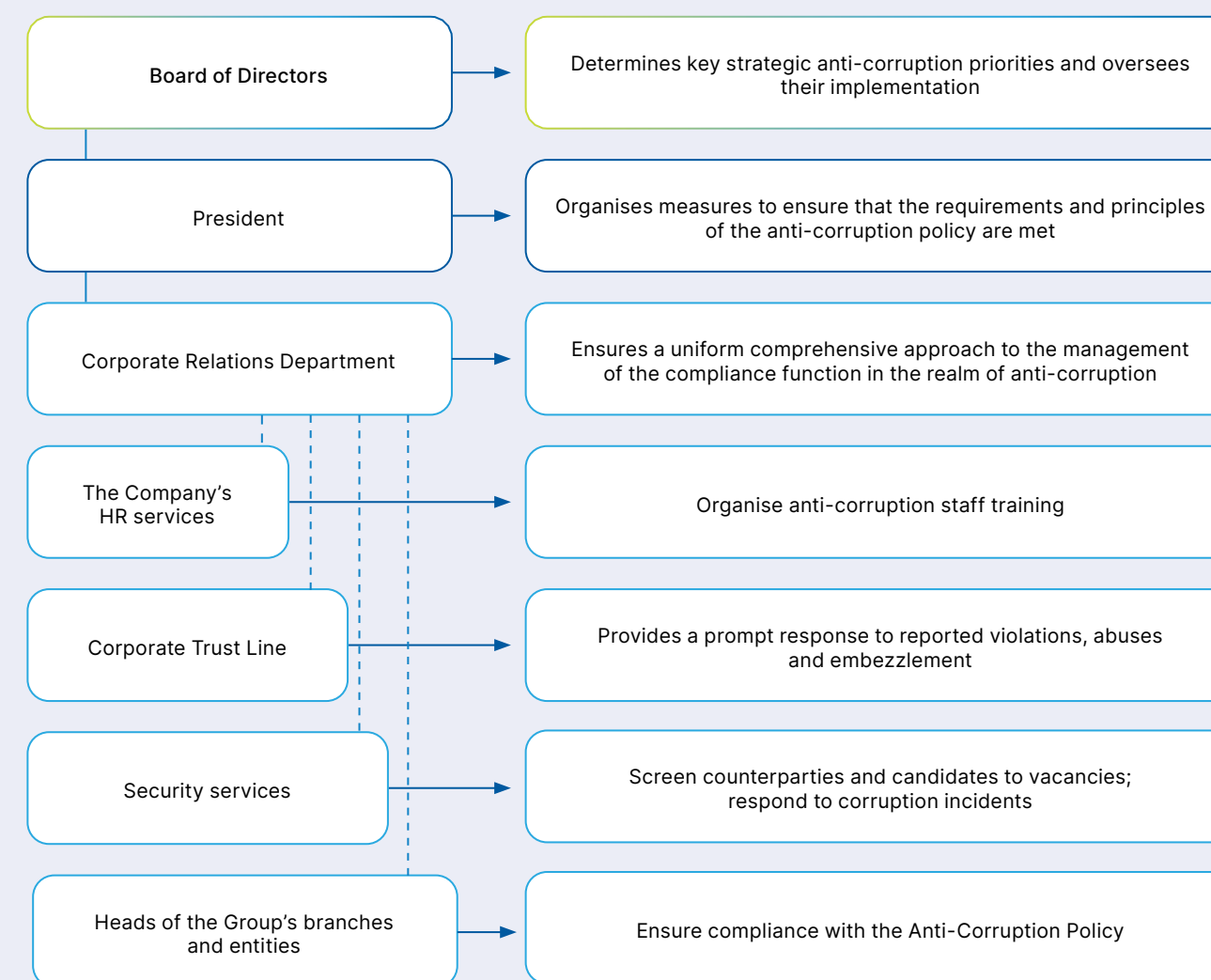
employees, and other stakeholders, but is also instrumental in improving social and economic conditions for the Company.

Nornickel sets the bar high for its employees and partners with respect to integrity and responsible business conduct, and has

zero tolerance to any form of corruption at all levels. With an anti-corruption and compliance framework in place, the Company works to eliminate any and all unethical and corrupt practices.

Anti-corruption practices: allocation of responsibility

GRI 2-9, 2-12, 2-13



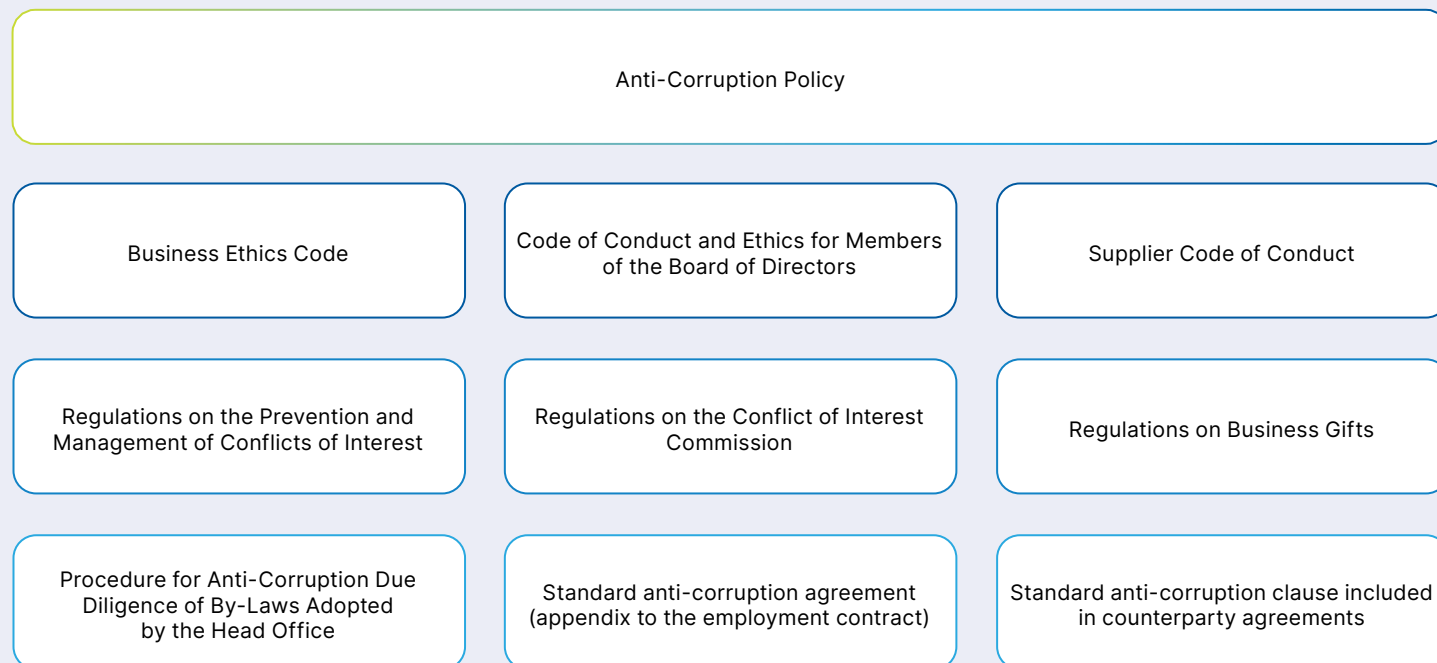
Guided by the United Nations Convention against Corruption, Nornickel also ensures compliance with Federal Law No. 273-FZ On Combating Corruption dated 25 December 2008.

Nornickel's Anti-Corruption Policy is the key internal document that governs the anti-corruption and corruption risk management efforts in the Company. The policy seeks to ensure compliance with

anti-corruption laws, as well as to prevent, identify and eliminate causes of corruption. The document applies to both Company employees and third parties, including foreign public officials and officials of public international organisations. The respective anti-corruption responsibilities are stipulated in agreements made with contractors or are expressly provided for by the applicable laws.

Nornickel Group's Russian business units adopt and implement their own anti-corruption regulations in line with the Company's anti-corruption policy. We also do our best to ensure our foreign operations comply with the key anti-corruption principles and requirements.

Key anti-corruption regulations



Our principles of business and ethical conduct are articulated in the Business Ethics Code that applies to the employees of all levels performing their job duties.

In 2014, Nornickel joined the Anti-Corruption Charter of the Russian Business. Once every two years, we submit a declaration to prove our compliance with anti-corruption

requirements as prescribed by the Anti-Corruption Charter of the Russian Business. Our anti-corruption initiatives are regularly covered in corporate press releases.

Every year, we take part in the Russian Business Anti-Corruption Rating compiled by the Russian Union of Industrialists and Entrepreneurs. Following a comprehensive

independent assessment in 2022, the Company received the highest A1 rating class. This is a proof of how much effort the Company's management invests in improving the anti-corruption system.

Preventing and fighting corruption

GRI 205-3, SASB EM-MM-510a.1

The key initiatives designed to develop and improve the anti-corruption compliance system in 2022 included:

- approving a uniform approach to the adoption of anti-corruption regulations and control mechanisms across the Group;
- conducting a training campaign on the basics of anti-corruption compliance for the Group's employees responsible for relevant practices;

- revising and updating the Company's anti-corruption regulatory and procedural guidelines.

In addition, the Company runs a wide range of internal initiatives on an annual basis.

In 2022, no corruption practices were revealed.

Focus areas



As regards the previously identified cases that involved Nornickel Group employees, court judgements were passed in 2022. Nornickel took disciplinary action in the form of dismissal against these employees in strict compliance with the law. Following convictions under these accusations, the Company conducted mandatory preventive talks with the staff on the unacceptability of law violations and zero tolerance for any unlawful acts, including corruption. The topics also cover the Business Ethics Code and the inevitability of penalty for any crimes¹.

Prevention efforts enable Nornickel to take adequate and timely action not just in identifying the wrongdoings, but also in avoiding them, which is one of the main goals of the Company's responsible units.

In addition, to further boost efficiency and improve anti-corruption performance, the employees of the Anti-Corruption Compliance Department at the Head Office are annually assigned individual performance indicators.

Corruption risk management

GRI 205-1

The Company performs an annual analysis of existing anti-corruption risks and ensures that business processes are monitored on a quarterly basis. The key risk areas are reviewed and the existing corruption risk map is updated as necessary. The Company identifies a number of key risks associated with the occurrence or possible occurrence of anti-corruption violations in its interactions with contractors, employees and government officials. Other sensitive areas include procurement, business gifts and hospitality expenses, charity projects, as well as the recruitment and hiring processes.

Nornickel aims to exclude any compliance risks, including contractor-related ones. To this end, Nornickel's Security Service performs a contractor due diligence review to identify corruption incidents or involvement in any corruption incidents, inclusion in the register of fraudulent suppliers and pending administrative proceedings. In case of negative findings, the Corporate Relations Department assesses the risk of relations with the contractor in question and recommends mitigants if applicable.

Regardless of the outcomes, the Company signs a standard master agreement containing an anti-corruption clause with all selected suppliers and contractors.

Anti-corruption monitoring

In 2022, we implemented an anti-corruption monitoring initiative to see how anti-corruption procedures are actually being put into practice across the Group. At the beginning of 2023, 91% of Russian business units of Nornickel Group adopted the key anti-corruption regulations and procedures. The Company continues to integrate anti-corruption procedures across the Group, including the newly created companies.

In 2022, to check compliance with Federal Law On Combating Corruption, we organised a random check across the Group's branches and Russian business units to look into procedures of entering into employment and contractor agreements with former government officials.

Following a previous internal audit into the efficiency of anti-corruption controls, the Group updated its anti-corruption regulatory and procedural guidelines while also eliminating the flaws in, and tightening control over preventive procedures.

Anti-corruption training

GRI 205-2

Nornickel provides regular training to its employees to raise awareness on anti-corruption practices. All new hires receive an induction briefing in this area. When recruited, they also need to familiarise themselves with the corporate Anti-Corruption Policy and sign an addendum to their employment contract that sets out anti-corruption responsibilities.

There is an online anti-corruption course taken by all employees and a dedicated course on compliance with anti-corruption laws for our HR function. The new approach to raising personnel awareness of anti-corruption procedures resulted in stronger employee training indicators in 2022. In addition, there was a major three-day training session for employees responsible for implementing anti-corruption procedures.

Educating and training employees on Nornickel's anti-corruption policies and practices in 2022, by region

Indicator	Norilsk Industrial District	Krasnoyarsk Territory (excluding the Norilsk Industrial District)	Murmansk Region	Moscow and other regions of Russia	Trans-Baikal Territory	Total
Number of employees made aware of the Group's anti-corruption policies and practices	54,837	3,429	12,375	7,999	2,852	81,492
Share of employees made aware of the Group's anti-corruption policies and practices, %	100	100	100	100	100	100
Number of employees trained on the Group's anti-corruption policies and practices	22,975	821	3,995	3,133	101	31,025
Share of employees trained on the Group's anti-corruption policies and practices, %	42	24	32	39	4	38

Educating and training employees on Nornickel's anti-corruption policies and practices in 2022, by category

KPI	Managers	White-collar employees	Blue-collar employees	Total
Number of employees made aware of the Group's anti-corruption policies and practices	12,868	18,170	50,454	81,492
Share of employees made aware of the Group's anti-corruption policies and practices, %	100	100	100	100
Number of employees trained on the Group's anti-corruption policies and practices	4,246	6,399	20,380	31,025
Share of employees trained on the Group's anti-corruption policies and practices, %	33	35	40	38

In 2022, the assessment of corruption-related risks² covered 81 business units, which is

98 % of the total number of the Group's business units.

¹ For more details, please see [Nornickel's 2021 Sustainability Report](#).

² Corruption-related risks were assessed for the aspects of anti-corruption activities significant for the Group.

Managing conflicts of interest

The Company pays special attention to timely identification and prevention of conflicts of interest. With the Regulations on the Prevention and Management of Conflicts of Interest at MMC Norilsk Nickel in place, the Company seeks to prevent and minimise the risk of employees' personal interests influencing

the business decision-making process. In addition, the Company approved the standard declaration form for reporting conflicts of interest, to be filled in by candidates applying for vacant positions and by individuals acting as independent contractors. There are also permanent Conflict of Interest Commissions working to ensure compliance with the principles of legality and improve corporate culture.

In 2022, we established a conflict of interest reporting process for the employees of Russian business units hired before the Regulations on the Prevention and Management of Conflicts of Interest came into effect.

Anti-money laundering and counter-terrorist financing initiatives

For the purposes of anti-money laundering / counter-terrorism financing / prevention of proliferation of weapons of mass destruction (AML/CFT/CPF), the Company has put in place internal controls in strict compliance with Russian laws and its own by-laws:

- Federal Law No. 115-FZ On Anti Money Laundering and Combating the Financing of Terrorism dated 7 August 2001;
- MMC Norilsk Nickel Internal Control Rules on Combating Money Laundering, Financing of Terrorism and Proliferation of Weapons of Mass Destruction.

- taking measures to mitigate the AML/CFT/CPF risks and their potential effects, among other things, by engaging all employees, within their competences, in identifying risk criteria for suspicious transactions;
- systematic employee training.

Other AML/CFT/CPF efforts include due diligence of customers prior to entering into contracts, identification of beneficial owners, analysis of customers' business reputation and other reasonable and available measures depending on the risk exposure.

In 2022, the Internal Control Rules were updated to reflect Federal Law amendments.

The key principle of internal control for AML/CFT/CPF purposes is the risk-based approach that covers:

- customer identification and due diligence;
- assessing the risk of suspicious transactions made by customers;
- assigning a risk group;



Grievance policy

GRI 2-16, 2-25, 2-26, 207-2

Corporate Trust Line

In 2010, Nornickel launched its Corporate Trust Line (CTL) as a primary tool to manage complains and queries. Available to a wide range of stakeholders, the line helps to quickly respond to their concerns relating to the protection of assets and corporate interests, prevention of abuse, theft and other violations.

The CTL is accountable to the Internal Control Department and operates in line with the Company's by-laws. Responsible for the service are its operator and head along with the Director of the Internal Control Department.

Report statistics (broken down by Group company) are submitted to units in charge on a quarterly basis. CTL performance is reviewed by the Board's Audit Committee. CTL is subject to assessment by the Vice President for Internal Control and Risk Management, the Board's Audit Committee and employees taking part in an engagement survey named "Let Everyone Be Heard. What Do You Think?".

Persons in charge of the CTL have individual KPIs such as a timely and proper processing of incoming communications and reporting on CTL performance to interested users.

Key principles

CTL is guided by the following principles designed to prevent retaliation against or pressure on whistle-blowers:

- guaranteed confidentiality for whistle-blowers;
- independent consideration of reports;
- timely and unbiased consideration of all incoming reports irrespective of the position and employment period of the person mentioned therein.

Any stakeholder may contact the CTL reporting both potential corruption and a wider range of matters related to violations of procedures and by-laws, including with respect to human rights, environment, labour relations, etc.



For everyone wishing to make a report, toll-free channels are available 24/7:

- +7 800 700 1941 and +7 800 700 1945;
- e-mail: skd@nornik.ru;
- online form at <https://www.nornickel.com/sustainability/corporate-hotline/>

The procedure provides for the operator to fully handle the report (from registration in the information system to review by a dedicated function and assessment of the response by the Head of the Corporate Trust Line) within 21 business days. The exceptions are reports that require immediate action or additional investigation. If found substantiated, the report triggers a set of control measures, and if a violation is confirmed, steps are taken to correct the situation, eliminate any negative consequences, and inform stakeholders.