

Public and media relations



Ranked **1**
in terms of mentions
in the media

The key channels used to relay information to the stakeholders and the public are the Company's official website www.nornickel.com, on which updates for stakeholders and general public are published, video and audio conferences, briefings, conference calls, and stakeholder meetings and dialogues. Nornickel regularly expresses its position – its senior management provides commentary to media outlets and it publishes press releases.

The Company has an efficient media communications system. In 2022, Nornickel was the top Russian metals and mining company in terms of mentioning in the media. The significant share of its publications covers social policy (14–15%). ESG matters have also gained greater focus over the last two years – the number of times they were mentioned increased from 2% in 2020 to 10% in 2022. Other most covered topics include environment, digitalisation, production development.

Dialogue with authorities and non-profit organisations



Represented in **25**
committees, commissions, expert
and working groups

The Company takes part in parliamentary sessions and round table discussion organised by the Federation Council and State Duma of the Federal Assembly of the Russian Federation, Government of the Russian Federation, Civic Chamber of the Russian Federation, Russian Union of Industrialists and Entrepreneurs, Chamber of Commerce and Industry of the Russian Federation, Association of Managers (an interregional public organisation), etc.

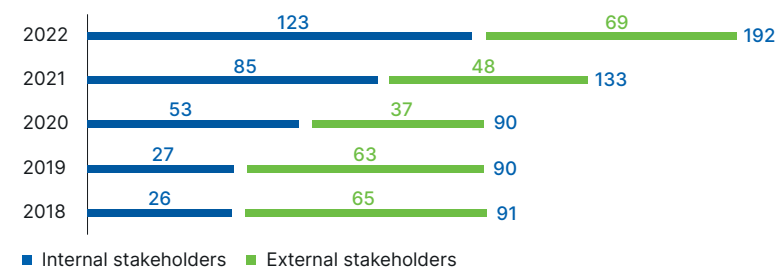
The Company's experts engage in debates on draft regulations organised by community councils of the federal executive bodies, anti-corruption due diligence, and regulatory impact assessments. All of that helps maintain a constructive dialogue with the government, cut administrative red tape and improve business climate in our country. Our representatives are also part of various working groups created by federal executive authorities to help implement the regulatory guillotine mechanism.

Dialogue in public non-financial reporting

192
stakeholders surveyed

Each year, Nornickel engages in dialogues with stakeholders while drafting sustainability reports and conducts surveys to define the material topics. In 2022, surveys covered 192 people, up by 44.4% from 2021.

Number of stakeholders surveyed as part of the efforts to define priority topics for the Sustainability Report in 2018–2022¹ (people)



¹ External stakeholders are representatives of regional and local authorities, communities, and non-profit organisations, while internal stakeholders refer to managers and employees of various levels from the Head Office, Polar Division, and Kola MMC.

Respect for human rights

GRI 2-23

SASB EM-MM-210a.3

Approach to respect for human rights

Recognition, respect and observance of human rights is a basic principle that underlies Nornickel's operations and is embedded in its corporate values, Human Rights Policy, and other Company's by-laws¹.

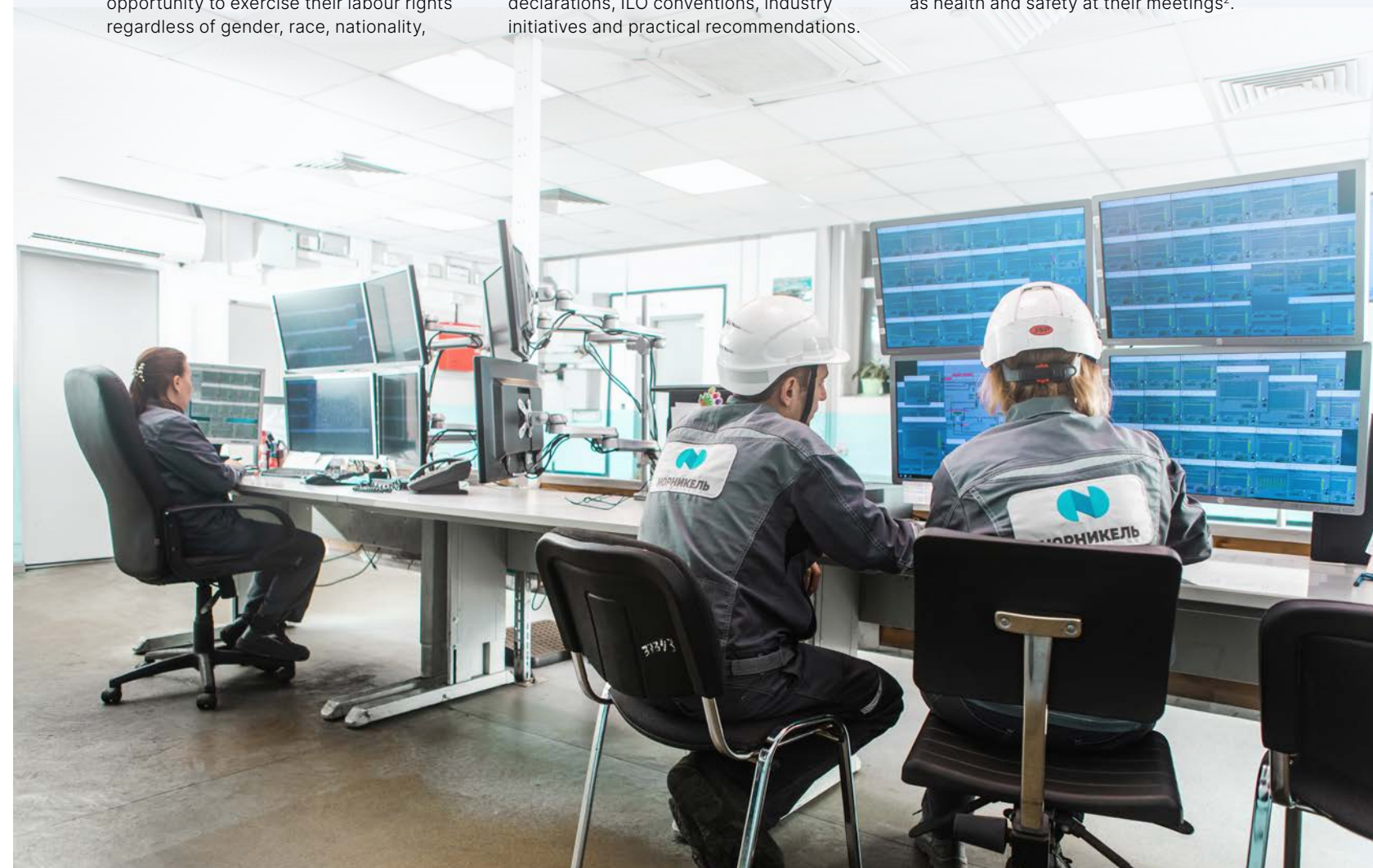
The Company does not tolerate any forms of discrimination and does not use forced or child labour, giving every employee an equal opportunity to exercise their labour rights regardless of gender, race, nationality,

origin, financial, social, and occupational status, age, domicile, religion, political beliefs, and other circumstances not related to professional qualities. No operations are run in, and no raw materials are procured from, areas involved in military conflicts.

Nornickel adheres to internationally recognised human rights norms and practices, including the core UN declarations, ILO conventions, industry initiatives and practical recommendations.

Russia ratified most core ILO conventions. Nornickel is required by law to abide by requirements established therein. Human rights are addressed in the Company's key by-laws.

The responsibility for human rights protection lays with the Company's senior management. The Board of Directors and its Committees consider key matters such as health and safety at their meetings².



¹ Nornickel's by-laws are available on the Company's official website.

² The distribution of responsibilities is shown on slide 10 of the publicly available presentation titled 'Protecting and respecting human rights at Nornickel'.

External human rights regulations and standards applied by Nornickel

Generally accepted international declarations and guidelines

- UN Universal Declaration of Human Rights
- International Labour Organisation's declarations on fundamental rights and principles at work
- OECD Guidelines for Multinational Enterprises
- UN Guiding Principles on Business and Human Rights

Russian legislation

- Constitution of the Russian Federation
- Labour Code of the Russian Federation
- Federal Law No. 181-FZ On the Occupational Health and Safety in the Russian Federation dated 17 July 1999, Federal Law No. 82-FZ On the Minimum Wage dated 19 June 2000, Federal Law No. 82-FZ On Safeguarding the Rights of Indigenous Minorities of the Russian Federation dated 30 April 1999, and other federal laws

Practical recommendations



Guide for Integrating Human Rights into Business Management (UN Global Compact)



Global Reporting Initiative, uniform reporting standards and recommendations



Voluntary Principles on Security and Human Rights (VPSHR)

International and Russian initiatives



UN Global Compact



Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy



UN Guiding Principles on Business and Human Rights (UNGPR)



Social Charter of the Russian Business

Industry-specific initiatives



IRMA Standard for Responsible Mining (2018)



ICMM Mining Principles



Responsible Minerals Initiative (RMI)



Protecting human rights at Nornickel. Regulations, approaches and key results

1 Business Ethics Code

2 Human Rights Policy

3 Equal Opportunities Programme

4 Working Conditions Policy

5 Occupational Health and Safety Policy

6 Personal Data Processing Policy

7 Freedom of Association Policy

8 Policy Regarding Support for Small and Medium Enterprises

9 Community Engagement Policy

10 Environmental Policy

11 Environmental Impact Assessment Policy

12 MMC Norilsk Nickel's Position Statement on Biodiversity

13 Renewable Energy Sources Policy

14 Indigenous Peoples' Rights Policy

15 Responsible Sourcing Policy

16 Supplier Code of Conduct

Right to life, freedom, and privacy, personal immunity, freedom of movement

Nornickel's by-laws

1 2 5 6

Approaches and key achievements in 2022

- In 2022, no cases of forced labour were registered;
- The Company does not restrict its employees' freedom of movement; it provides relocation assistance to employees in difficulty and allocates transportation subsidies to workers living beyond the Arctic Circle;
- The Company protects the personal data of its employees and protects them from arbitrary detention.

➔ For more details, please see the [Social Policy](#), [Occupational Health and Safety](#), and [Corporate Security](#) sections

Right to safety, including occupational health and safety

Nornickel's by-laws

1 2 3 5

Approaches and key achievements in 2022

- Nornickel confirms its zero tolerance approach to work-related fatalities; in 2022, the Company recorded the lowest ever number of work-related fatalities;
- In 2022, health and safety expenses amounted to RUB 20.6 bn, or RUB 270,000 per employee.

➔ For more details, please see the [Occupational Health and Safety](#) section.

Right to protection from discrimination

Nornickel's by-laws

1 2 3

Approaches and key achievements in 2022

- The Company does not tolerate discrimination on any grounds;

- In 2022, Nornickel had no reported cases of racial, gender, religious, political, social or other discrimination.

➔ For more details, please see the [HR Management and Social Partnership](#) section

Right to freedom of association and collective bargaining

Nornickel's by-laws

1 2 3 7

Approaches and key achievements in 2022

- The Company maintains a well-developed social partnership framework, with collective agreements covering 94.4% of the workforce. The Group companies are parties to a total of 23 collective bargaining agreements.
- As at the end of 2022, 7.4% of the Company's employees were members of trade unions, while 77% were represented by social and labour councils.

➔ For more details, please see the [HR Management and Social Partnership](#) section

Right to work, fair and adequate remuneration, favourable working conditions, and social security

Nornickel's by-laws

1 2 3 4

Approaches and key achievements in 2022

- The average salary paid to Nornickel's employees is well above Russia's average, standing at RUB 182,500 per month in 2022;
- The Company offers its employees a wide range of benefits and social assistance programmes (in 2022, the compensation package across the Group came in at RUB 194,700 per month, with the social assistance package accounting for 6% of this amount);
- Nornickel put in place an updated version of the Made with Care employee comfort programme (in 2022, 171 facilities underwent repairs, with RUB 3.2 bn allocated to improve social and working conditions);
- The Company takes steps to secure jobs for vulnerable population groups and people with disabilities.

➔ For more details, please see the [HR Management and Social Partnership](#) section

A requirement for counterparties to respect human rights as part of the supply chain responsibility commitments

Nornickel's by-laws

1 2 15 16

Approaches and key achievements in 2022

- The Company introduced a Supply Chain Due Diligence Management System to identify and mitigate a variety of risks, including the risk of violating human rights and freedoms;
- The Company underlines its commitment to a zero tolerance approach to any violations of human rights across the supply chain.

➔ For more details, please see the [Respect for human rights and Supply Chain Responsibility](#) sections

Right to education

Nornickel's by-laws

1 2 3 9

Approaches and key achievements in 2022

- The Company ensures equitable access to education for all categories of its employees by offering them a wide range of training programmes;
- In 2022, the average annual number of training hours per employee (based on average headcount) was 85, with the Company spending an average of RUB 21,113 per employee.
- The Company offers educational opportunities in the regions of operation as part of its World of New Opportunities programme;
- The Company provides targeted support to educational institutions across its geographies (cooperation with 30 institutions).

➔ For more details, please see the [HR Management and Social Partnership](#) section

Protection of family, maternity and childhood

Nornickel's by-laws

1 2 9

Approaches and key achievements in 2022

- The Company respects and protects the rights of mothers and pregnant women;
- The Company provides all the necessary conditions for an employee to return to work from a maternity and/or childcare leave (in 2022, 592 employees returned to work after such leaves);

- The Company's social programmes in the fields of housing, healthcare and culture aim to support and provide leisure opportunities for families.

➔ For more details, please see the [Social Policy](#) section

Right to a reasonable work schedule and paid leave

Nornickel's by-laws

1 2 4

Approaches and key achievements in 2022

- The Company complies with internal labour regulations, which are approved in consultation with the trade union organisation to establish the working hours of employees;
- Employees are entitled to paid job-protected annual basic and additional leaves;

➔ For more details, please see the [HR Management and Social Partnership](#) section.

Right to shelter, right to own property

Nornickel's by-laws

1 2 9 14

Approaches and key achievements in 2022

- The Company does not implement or plan to implement any business projects related to alienation of land and forced relocation;
- In 2022, the Company continued running the Our Home / My Home and Your Home housing programmes (since the start of the programmes, 5,842 apartments have been provided to the Company's employees).

➔ For more details, please see the [Social Policy](#) section

Right to a healthy environment

Nornickel's by-laws

1 2 10 11 12 13

Approaches and key achievements in 2022

- The Company continuously works to reduce its environmental footprint and implements a comprehensive environmental policy;

- As a result of Nornickel's Sulphur Programme, SO₂ emissions in Kola Division have gone down by 90% since 2015. The Company is now actively implementing the Programme in Norilsk Division;
- In 2022, the Company completed the first stage of implementing the air quality monitoring and forecasting system in Norilsk and Monchegorsk.

➔ For more details, please see the [Environmental Management](#) section

Rights of local and indigenous communities

Nornickel's by-laws

1 2 8 9 14

Approaches and key achievements in 2022

- The Company has a wide range of programmes to improve the living standards of local communities (for example, the World of New Opportunities programme with 30,000 participants and the Plant of Goodness project with 3,500 volunteers and 370 events);
- The Company respects the rights of indigenous peoples and seeks to improve their living standards. As part of interactions with the indigenous minorities, Nornickel abides by a number of agreements. In 2022, the Company allocated RUB 412 mln to finance assistance projects.

➔ For more details, please see the [Development of Local Communities](#) section

Human rights due diligence

To identify and assess any risks associated with direct or indirect human rights violations as a result of the Company's business operations and to take steps to prevent and/or minimise such risks, Nornickel applies the human rights due

diligence procedure based on the UN Guiding Principles on Business and Human Rights (UNGPR).

In 2022, the Company created a target model for this procedure to be implemented in five stages. Engagement with stakeholders and training are integrated into all stages.

Nornickel's human rights due diligence target model



As at the end of 2022, the following activities were implemented:

- Stage I activities were implemented in full: Commitment to human rights;
- Stage II activities were implemented to a significant extent: Identification and assessment of human rights risks and impacts;

- Activities of the following stages were implemented in part: Human rights risks and impact management, Monitoring and control, Information transparency.

The due diligence system rollout is scheduled to be completed in late 2024.

Human rights impact assessments

In 2022, Nornickel held a preliminary human rights impact assessment. An outline assessment of business and human rights risks in the Company's main jurisdictions was undertaken at the head office and division levels and involved interviews with employees and reviews of by-laws conducted by an independent expert organisation.

Stage	Activities
1. Policy assessment	<ul style="list-style-type: none"> • a comprehensive review of the architecture of Nornickel's policies and documents in sustainable development; • preliminary risk assessment; • analysis of legal and political landscapes in terms of human rights in key markets and operating environments; • analysis of deficiencies and opportunities for improvement by way of revising the documents to integrate human rights as an element of Nornickel's corporate culture;
2. Risk assessment	<ul style="list-style-type: none"> • an in-depth analysis of the risks and impacts prioritised at stage I (analysis of specific human rights risk areas and relevant prevention and control measures); • development of updates to the human rights risk identification and assessment methodology, a human rights due diligence procedure as adapted to Nornickel's needs, regulations and guidelines for future consideration within the Company and with stakeholders;
3. Impact assessment at the level of production units	<ul style="list-style-type: none"> • risk assessment and analysis at the division and production unit levels, preparation of a final report and presentation; • development of recommendations on managing risks related to human rights; • detailed discussion with stakeholders of all prioritised human rights risks and impacts from the Company.

It was concluded that the Company as a whole and broken down by divisions and production units had low human rights impact on its key stakeholders and low exposure to business and human rights risks in Russia. This report highlights some of the most important human rights initiatives and their outcomes in 2022.

- For more details on the progress of the human rights due diligence system and human rights impact assessment, please see [Nornickel's 2022 Human Rights Report](#).

Procedure to report human rights violations

Nornickel's Corporate Trust Line is the first port of call for reporting human rights violations. In addition, the Company conducts regular personnel surveys and local community sentiment research. The Company guarantees anonymity and confidentiality for whistleblowers and respondents. All employees

are kept thoroughly informed of this service through information displays and stands, payslips, corporate calendars and brochures. A brief description of the Corporate Trust Line is available on the Company's website.

In 2022, we held discussions with stakeholders on options for updating the corporate grievance mechanism. As a result, we received

recommendations on how to optimise the mechanism. As at the end of 2022, the Company revised the relevant regulations and improved the grievance mechanism.

- For more details, please see [the Corporate Trust Line and Grievance Mechanism subsections](#).

Human rights training

In 2022, the Company proceeded with its previously established plans to deliver basic training on human rights to the employees of the relevant units of the Head Office and companies/units of its divisions.

Some of the topics addressed include the importance of respect for and protection of human rights in the modern world, human rights in the metals and mining industry, the risk assessment system, challenges and commitments of the Company in the area of human rights, priorities to promote respect for human rights in the Company's corporate culture, basic knowledge of and skills for human rights risk assessment, etc. Nornickel also organised a standalone seminar for HR teams and relevant training for the Corporate Security employees to ensure compliance with the Voluntary Principles on Security and Human Rights (VPSHR).

The Company's human rights programmes were attended by more than 150 employees of the Group. The average duration of a training session was 1.5 hours.

Women in Mining Russia

Nornickel is a key partner of Women in Mining Russia (WIM Russia), a non-profit organisation that aims to promote professional development of women, raise awareness about engineering jobs, and develop a platform for professional communications. The organisation was named the Best Gender Equality Project at the Woman Who Matters award.

2022 was the second time WIM Russia held its Talented Woman in the Extractive Industry award ceremony in Moscow. The award received 388 entries, which is 64% more than in 2021. It brought together women from 40 Russian and CIS companies, with 20 coming out winners. Nornickel's employees received four out of ten nominations:

- Ambassador of the Year: Alexandra Nikolaeva (Dudar), manager, Management System Development Group, Darya Ermakova, chief expert, Sustainable Development Department (Kola MMC);
- Personal Achievement of the Year: Maria Korovina, dispatcher, Concentrator (Nornickel's Kola MMC), Zukhra Meshalkina, advisor to technical director (GRK Bystrinskoye);

- Breakthrough of the Year: Nadezhda Platonova, HSE director (GRK Bystrinskoye);
- Social Project of the Year: Anfisa Nikiforova, head of relations with indigenous minorities of the North, Nornickel's Polar Division.

15 women earned a Jury's Choice award. There were also Nornickel's employees among them:

- Larisa Bogdanova, grade 4 control console operator, GRK Bystrinskoye (Golden Idea of the Year);
- Olga Bondareva, head of procurement, Nornickel's Polar Division (Personal Achievement of the Year);
- Darya Shmakova, chief expert, gas treatment and recycling engineering support laboratory, Nornickel's Polar Division (Leader of the Future);
- Adelia Davlyatshina, grade 2 process engineer, Norilsk-Taimyr Energy Company (Personal Achievement of the Year);
- Maria Kalashnikova, head of hydrometallurgy laboratory, Gipronickel Institute (Inspiring Leader);
- Elena Pastushenko, expert in electrolysis of water solutions, Kola MMC (Golden Idea of the Year).

Occupational health and safety

Human capital

GRI 403-1

At Nornickel, we give priority to the life and health of employees over operational performance both when making management decisions and throughout the entire production. Nornickel's

Occupational Health and Safety Policy outlines the Company's commitment to creating a safe and healthy environment and fostering sustainable employee motivation for safe workplace behaviour.

Main occupational health and safety goals:

01

Zero catastrophic occupational accidents: prevent accidents at the Company's facilities that may have negative impact on people from across the Company's regions and the Company's production results

02

No work-related fatalities: zero tolerance to any work-related fatalities

03

Safe working conditions and mitigation of mining and processing risks

