

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



Health and safety management

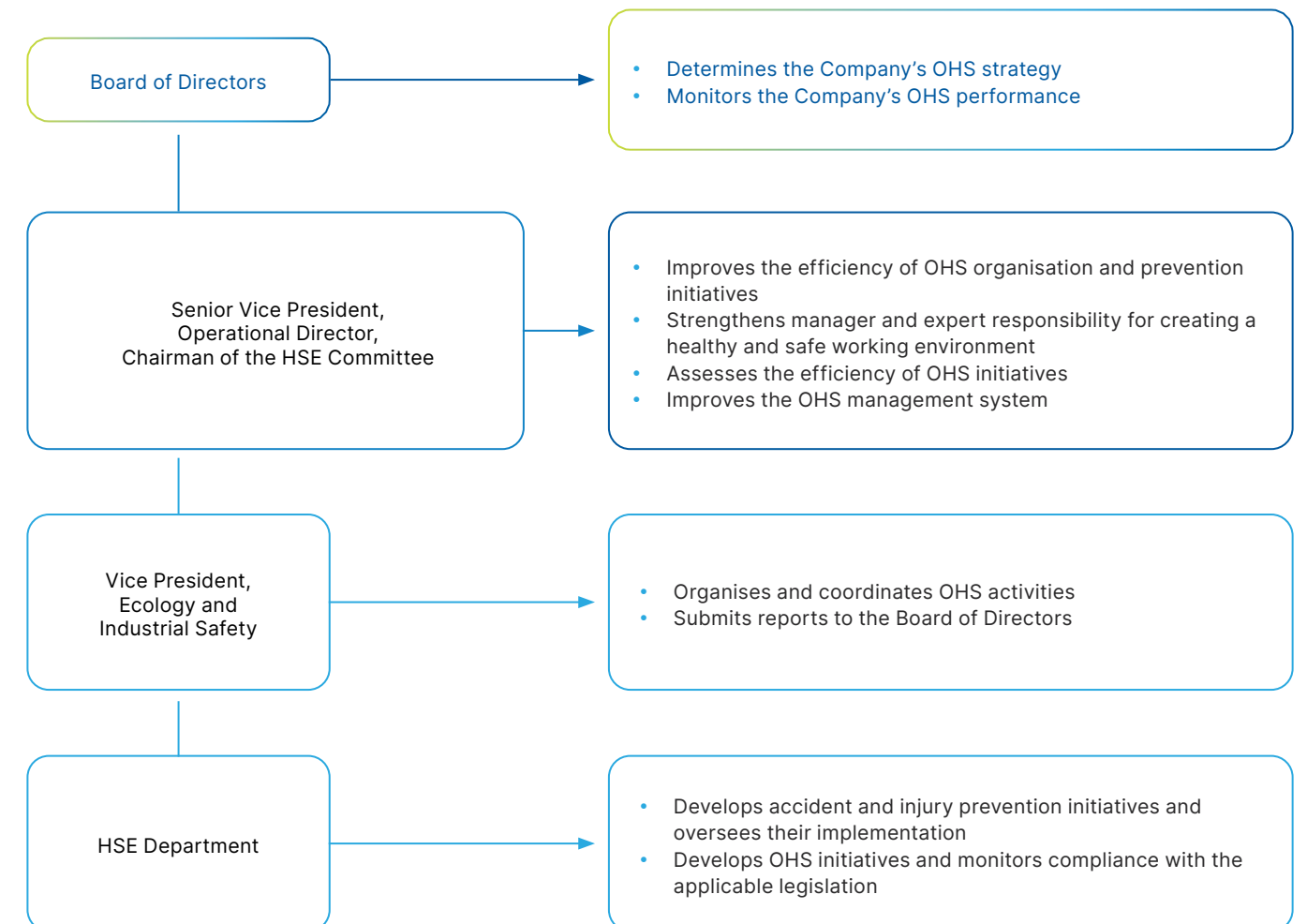
Occupational health and safety (OHS) at Nornickel covers all the Company's employees. It is governed by the Russian laws, international regulations and standards, and internal policies and regulations.

OHS regulations:



Occupational health and safety responsibilities are allocated among Nornickel's various governing bodies and business units in line with their terms of reference.

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



In 2022, the second surveillance audit was conducted at Nornickel's divisions. The audit results confirm that the Company's existing health and safety

management system conforms to ISO 45001:2018 Occupational Health and Safety Management System international standard.

Occupational health and safety certification

MMC Norilsk Nickel (Head Office, Polar Division, Polar Transport Division, Murmansk Transport Division)	ISO 45001:2018
Kola MMC	ISO 45001:2018
Pechengastroy LLC	ISO 45001:2018
Norilsk Nickel Harjavalta	ISO 45001:2018

Following the audits, Bureau Veritas Certification, the certification body, described the OHS management system as mature and well-established and found that the corporate systems of Nornickel's audited companies met the requirements of the standard.

Contractor safety management

GRI 403-1, 403-2, 403-5

2022 saw the revision of the standard regulating occupational health and safety at all stages of working with contractors. As a result, the Company was able to improve the level of control and occupational safety for contractors operating at Nornickel's facilities.

In the domestic market, Nornickel procures production and technical supplies under Master Agreements. As part of centralised procurement, a standalone agreement is signed with each contractor stating that the contractor recognises and commits to generally accepted principles in human rights (which include health and safety) and labour relations, as stipulated by international regulations and in particular the UN Global Compact.

In 2022, the Company revised the general terms regarding health and safety that are included in agreements with contractors. The current amendments focus on avoiding fatalities and non-compliance with the cardinal occupational safety rules and encourage contractors to be proactive on health and safety. This approach is better aligned with the Company's goals.

All works carried out by contractors in highly hazardous conditions are governed by the respective corporate standard. Work permits, operations certificates and work execution plans (process sheets, guidelines, etc.) must contain safety requirements to be met when organising and performing work. The Company checks compliance with these requirements during each shift.

Prior to commencement of work, contractors' staff receive pre-job and ad hoc health and safety briefing, including security measures set forth in work execution plans.

On the sites of its facilities, the Group holds regular joint inspections of compliance with safety requirements at work, and OHS council (committee) meetings involving contractor representatives. In case of failure to comply with OHS requirements, contractors are fined.

Workplace injuries

SASB EM-MM-320a.1

In 2022, we updated the procedure for collecting information on OHS incidents. These efforts helped improve transparency and quality of incident classification. The revised incident reporting procedure resulted in faster response times while the optimised incident classification opened up more opportunities for further data analysis. Root cause detection and investigation also had a major overhaul, which contributed to more effective incident prevention.

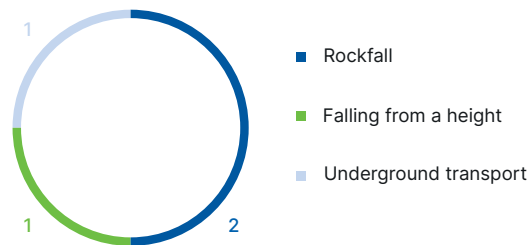


Key workplace injury indicators

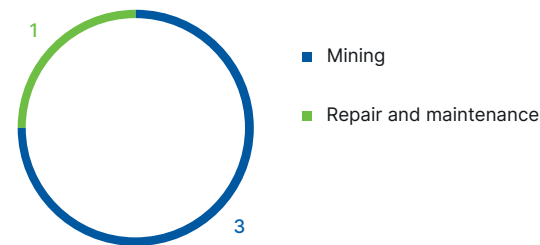
GRI 403-9, 403-10

Indicator	2018	2019	2020	2021	2022	Change in 2022 y-o-y, %
FIFR	0.05	0.08	0.08	0.10	0.03	-66
LTIFR	0.23	0.32	0.20	0.38	0.57	+49
Total workplace injuries as per Russian labour laws	32	44	31	53	70	+32
Fatal workplace injuries	6	9	9	11	4	-64
Minor injuries	1,043	1,000	788	314	187	-40
Occupational diseases	318	290	235	213	174	-18

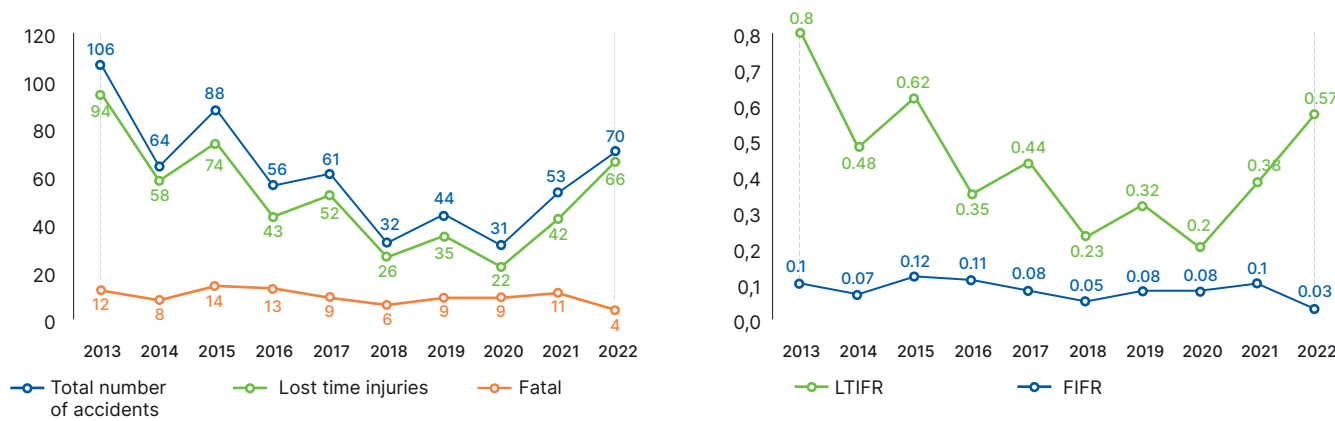
Number of fatalities by accident type in 2022



Number of fatalities by work type in 2022



Accidents and work-related injuries since 2013



In 2022, the Group had 66 lost time injuries, with lost time injury frequency rate (LTIFR) standing at 0.57. The most frequent reason for injuries was falling from heights. Nornickel's indicators in this area are in line with the average for the global mining industry.

In 2022, we recorded the lowest number of work-related fatalities. The Group reported four fatalities – this is seven cases fewer than in 2021. Two deaths were caused by rock falling in Kola and Norilsk Divisions, one man died as a result of falling from height, and one drift miner died in a mine accident when driving an electric locomotive.

All circumstances of the fatal accidents were thoroughly investigated and reported on to the Board of Directors.

Based on the results of investigations into the accidents involving rock falling in Kola and Norilsk Divisions, the Company developed and implemented technical measures to mechanise underground workings development, purchased a drilling rig for tunnelling (air core drilling) and mechanical posts for temporary supports and took a number of organisational measures to fulfil the requirements of mine surveyors.

To address the causes of falling from heights on work sites, a panel of workers was tasked to carry out an inspection to check the technical condition of overhead cranes, emergency evacuation routes and the available safety equipment. In 2022, the Company commenced the upgrade of overhead cranes to enable safe emergency evacuation of crane operators. These efforts will continue into 2023.

Following the investigation into the accident with a drift miner who was driving an electric locomotive in Kaula-Kotselvaara mine (part of Severny Mine), Nornickel arranged transportation of workers to workplaces, introduced control over unauthorised driving of electric locomotives and revised the mine railway infrastructure programme.

Nornickel expresses its deepest condolences to the families and friends of the victims and reiterates its commitment to making zero workplace fatalities a key strategic priority. The Company will continue with implementing its programmes to prevent workplace accidents.

OHS system development and mitigation of key risks

GRI 403-1, 403-2

As part of our strategic goal to reduce the occupational injury rate, the Company seeks to continuously improve the elements of its occupational health and safety framework. The changes cover all Operating Unit businesses and all production stages – from mining ore to making metals.

In 2022, we revised our cardinal safety rules, OHS incentive programme and employee awareness raising initiatives. From 2023, employees will be paid incentive compensation for identifying risks at their workplaces.

In the reporting year, Norilsk Concentrator (owned by Medvezhy Ruchey LLC) launched a safety culture transformation project underpinned by a risk-based approach.

As part of the project, it carried out:

- an audit of its safety culture and relevant processes;
- a strategic session to define key systematic measures;
- training at pilot workshops;
- work to improve its risk identification and assessment system.

The project helped identify 462 risks, out of which 101 were addressed, with 222 risks identified and reported by mining workers. The project will continue into 2023.

Anyone who identifies a life- and health-threatening risk must report it to the relevant senior manager to address it. If it is impossible to minimise the risk and continue to work safely, the exposed worker has the right to refuse to work if their

health and safety is at risk. The procedure for refusing to work is established by the standard "OHS Management System. Hazard Identification, Assessment and Management of Occupational Health and Safety Risks at PJSC MMC Norilsk Nickel". An employee who refuses to work is required to fill in a checklist and hand it over to their direct supervisor or, if the latter is temporarily unavailable, the relevant senior manager. To confirm acceptance, the supervisor or manager (as the case may be) must fill in, sign and return the tear-off part of the checklist to the worker and give him/her a new checklist. The refusal to work under life- and health-threatening conditions may not constitute grounds for imposing any sanctions on the worker.

In 2022, we continued our work to improve the Control, Management and Security Automated System (CMS AS) and integrate it into broader IT architecture:

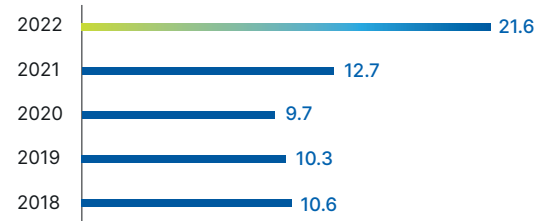
- more than five new algorithms implemented to enable notification of responsible persons via corporate email;
- integration between related systems (SAP ERP, SAP BW) and NIKA chatbot completed;
- The unified indicator framework for the corporate sustainability reporting, which is part of the Corporate Data Storage (CDS), successfully embedded to enable online annual report generation using the unified indicator framework for the corporate sustainability reporting with respect to the Group's injuries data.



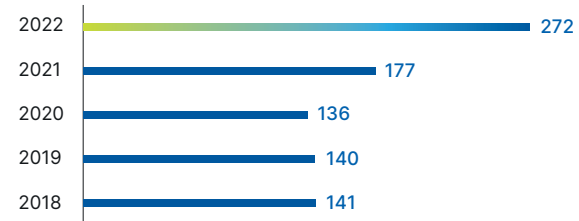
OHS control and prevention

To avoid workplace injuries, Nornickel regularly implements control and prevention activities.

Health and safety expenses (RUB bn)



Health and safety expenses per employee (RUB '000)



In 2022, health and safety expenses increased by 70% y-o-y to RUB 21.6 bn. The increase is due to the development and implementation of additional measures to improve labour conditions, growing headcount and higher costs of personal protective equipment (PPE).

Provision of Personal Protective Equipment

GRI 403-3

Due to the nature of its business, building an efficient operational health and safety system at Nornickel comes with the need to implement a range of organisational safety measures along with providing PPE to its employees exposed to hazardous and harmful workplace factors. Workplaces exposed to hazardous and harmful factors include underground work, operation

and maintenance of mining equipment and heavy self-propelled vehicles, extreme climate, etc.

In 2022, the Company purchased personal protective equipment worth more than

RUB **4.6** bn



Special assessment of working conditions

In 2022, a special assessment of working conditions covered more than 10,000 workplaces and over 15,000 employees, which amounted to approximately RUB 20.5 mln in expenses for the Group's operations.

A special assessment of working conditions helps identify hazardous production factors. Whenever these are identified, the Company furnishes employees with free personal protective equipment (PPE), including respiratory protection (respirators, gas masks), hearing protection (earmuffs, earplugs), eye protection

(glasses/goggles with UV filters, visors), skin protection (gloves, protective and regenerative creams, protective outerwear).

01

OHS monitoring system at each facility, including multi-phase production site control and ad hoc, targeted and comprehensive OHS inspections

02

Internal OHS management audits



04

Second-party OHS management audits (cross-company audits of the Group companies involving the OHS heads and experts from other Group companies)

03

Compliance and certification audits as part of ISO 45001:2018 management system

Health and safety competitions

Indicator	2018	2019	2020	2021	2022
Audits conducted:					
• by health and safety committees, '000	>30.9	>29.8	>48.5	>50.3	>47.7
• Target audits conducted by managers, senior specialists and committees of the Group's facilities and business units, '000	9.7	9.6	10.6	11.1	11.4
• Ad hoc audits, '000	15.7	15.5	27.0	23.0	21.9
• Number of comprehensive audits of health and safety and relevant management systems	149	126	164	182	174
Coupons removed from the books of employees violating health and safety requirements, '000	2.2	1.8	1.1	1.1	0.6
Employees subject to disciplinary action for the violation of health and safety requirements, '000	6.8	6.3	5	3.3	2.1
Employees with reduced bonus payments, '000	>13.0	>11.9	>10.0	>8.0	>6.5
• Total, RUB mln	>70.0	>69.0	>59.0	>66.0	>61.5
Employees incentivised for health and safety involvement and lower workplace injury rate as per the audit results, '000	>6.4	>6.5	>5.0	>5.0	>4.0
• Total, RUB mln	>52	>57	>59	>69	>58

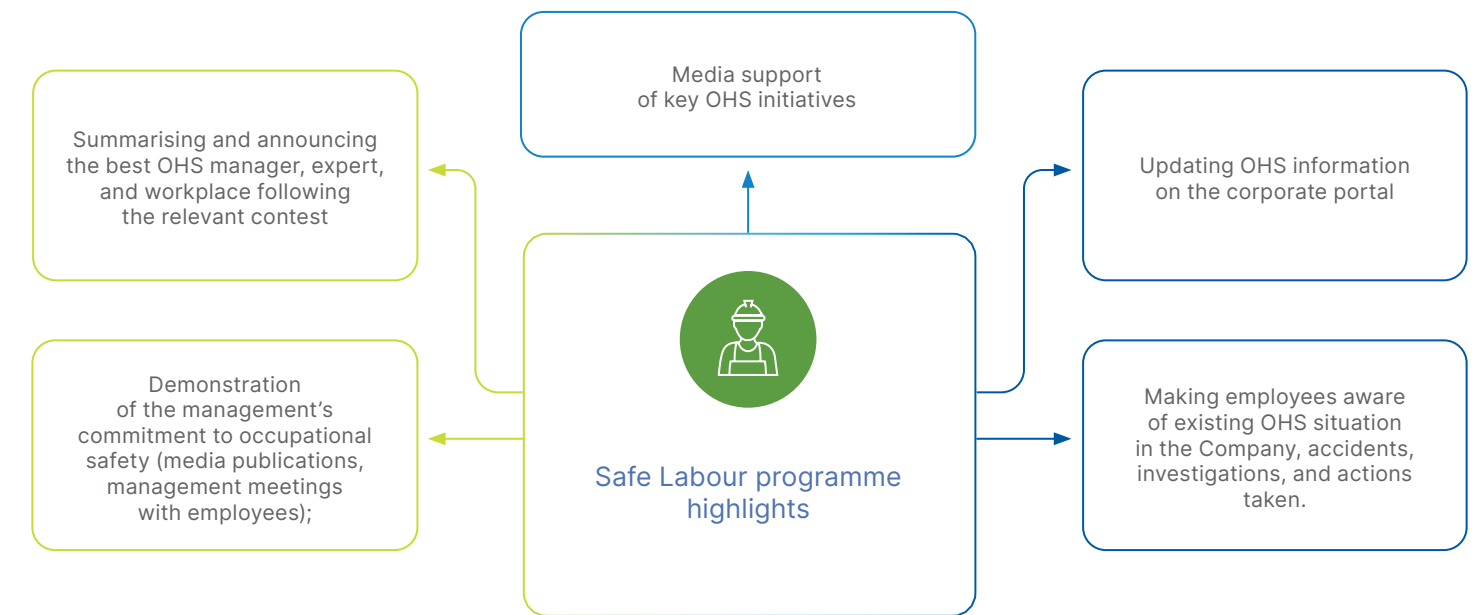
In 2022, as has become custom at Nornickel, we held individual and team OHS competitions. Team competitions were held across seven groups of Nornickel's production facilities.

Results of individual competitions were announced with the following awards granted:

- Best Health and Safety Head;
- Best Health and Safety Line Manager;
- Best Health and Safety Specialist;

- Best Health and Safety Compliant Worker.

The Company also runs an ongoing Safe Work communication programme.



Engagement of employees in safety management

GRI 2-26, 403-4

To increase the efficiency of our efforts and promote safety culture, we encourage our employees to get involved in operational health and safety management. Most of the Group companies have in place joint health and safety committees (councils) made up of the management, employees and trade union representatives. The Group companies that have joint committees with trade union bodies employ over 77,000 people (around 97% of the Group's average headcount).

The Head Office does not have a joint committee as there is no trade union in place, but representatives of the Norilsk trade union take part in HSE Committee meetings. Norilsk Nickel Corporate University (an educational institution not involved in production) does not have committees. Contractors are invited to joint committee meetings that deal with matters related to contractor employees.

Authorised representatives of trade unions and staff in occupational health and safety were elected to participate in preventive activities across the Group's production units. In the reporting year, 712 representatives of trade unions and staff in occupational health and safety participated in preventive activities. In 2022, they took part in over 11,500 audits and submitted almost 2,600 health and safety improvement proposals.

Health and safety topics covered in formal agreements with trade unions

SASB EM-MM-310a.1

A majority of production companies of the Group have collective bargaining agreements signed with employee

representatives (including trade union organisations). The agreements contain occupational health and safety provisions

They cover more than
77,000
employees of the Group (approximately 94.4% of the Group's average headcount).

OHS training

GRI 403-5, SASB EM-MM-320a.1

In 2022, OHS pre-certification briefing, basic training and certification covered more than

52,000

employees of the Group

RUB **203** mln

The Group's OHS training expenses amounted to over

To improve occupational safety, we implement OHS upskilling initiatives. These include regular briefings on and training courses in occupational health for its employees. We introduced dedicated software modules for specific mining jobs in order to provide health and safety briefings.

In 2022, Nornickel launched a project to create a workplace safety culture coaching system. The project is rolled out at 18 companies employing 42 safety culture coaches. There are two training programmes currently on offer: Dynamic Risk Assessment for mining workers and Behaviour-Based Safety Audit for line managers. The coaches

deliver in-person interactive workshops, which are followed by on-the-job training within the real work environment such as a mine or shop. In 2022, more than 5,000 employees completed the Dynamic Risk Assessment programme, which was held 717 times, and 238 employees completed the Behaviour-Based Safety Audit programme, which was held 33 times.

Prevention of occupational diseases

GRI 403-3

In 2022, the Group's costs related to medical examinations amounted to

RUB **471** mln

In 2022, the Group's costs related to maintenance of medical aid posts amounted to

RUB **276** mln

Health of its employees is a priority at Nornickel. The Company implements regular measures to prevent occupational diseases.

Regular health monitoring of personnel is key to preventing occupational diseases. Employees undergo compulsory pre-employment, regular and ad hoc medical examinations and check-ups. Those who are involved in hazardous production are subject to additional examinations held at least once in five years by occupational pathology centres or other organisations authorised to conduct pre-employment

and regular check-ups. These serve to assess occupational health fitness and determine if the disease is job-related.

The Company provides employees working in hazardous conditions with foods, milk, and other equivalent food products for therapeutic purposes in compliance with the applicable laws and corporate policies.

In addition, medical aid posts are in place to perform pre-shift and pre-trip check-ups and provide medical assistance to employees upon request.



Corporate Healthcare project

GRI 403-6

By 2025, Nornickel plans to provide its employees and their families with an easy and quick access to quality healthcare in line with the latest standards.

In 2022, the Company completed the first stage of the programme to upgrade its healthcare facilities and medical examination rooms for pre-trip and pre-shift check-ups. The first refurbished facilities with state-of-the-art equipment, medications, and expendables opened

in Nornickel's Polar Division. Primary care is provided by the Workshop Healthcare Service. General Practitioners (GPs) at Polar Division's medical aid posts are responsible for helping those with urgent medical problems and delivering preventive health care

to the Company's employees. The service has started work to conduct staff health monitoring linked to job duties and analyse occupational disease factors and ways of mitigating them. The Company plans to open similar facilities at its other divisions in 2023.



Nornickel’s corporate healthcare infrastructure

To provide our employees and their families with specialist medical services and highly qualified professionals, we are implementing a project to develop corporate healthcare across the Company’s footprint.

The Company is running projects to establish healthcare centres across its regions of operation to serve all local residents under the compulsory health insurance programme. In 2022, Nornickel completed repair and upgrade of new medical facilities – an MRI centre in Monchegorsk (serving local residents under the compulsory health insurance programme) and a corporate medical centre in Dudinka. The centres will open to their first patients in 2023.



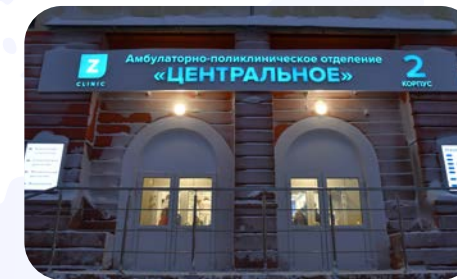
Norilsk Division

In 2021, the Company opened its first corporate healthcare centre under the Z-Clinic brand in Norilsk, which has the most advanced equipment and highly professional medical staff. It provides medical help based on voluntary

healthcare insurance (VHI) programme. Today, the centre offers a choice of 246 healthcare services in 12 primary care areas. Over the first year of its operation, it has delivered approximately 70,000 medical services. The waiting times

for many specialists vary from seven days to one month, which confirms the high level of demand for healthcare services in the region.

Operating healthcare centre at Norilsk Division



- 1 Central outpatient facility**
 - 16 December 2021
 - 8/3 Sevastopolskaya Street
 - 200 people per day
 - 746.3 sq m
 - 240 people per day (two-month advance appointment)

Healthcare centres at Norilsk Division – plans

In 2022, we continued to expand our network by including new centres to increase healthcare capacities in the region without replacing existing ones. The Company is getting ready to open two more corporate healthcare centres – in Norilsk’s Talnakh District and Monchegorsk. It also keeps on track its programme to develop small-scale healthcare departments in remote locations.

- 2 Talnakh**
 - 2023
 - 16 Kravtza Street
 - Tender announcement
 - 1,863.3 sq m
- 3 Kayerkan**
 - 2023
 - 3A Shkolnaya Street
 - Terms of reference fine-tuned
 - 504.2 sq m
- 4 Dudinka**
 - 2023
 - 1 Korotkaya Street
 - Tender
 - 400 sq m
- 5 Central**
 - 2025
 - 17 Moskovskaya st
 - Terms of reference fine-tuned
 - 4,071 sq m

Kola Division

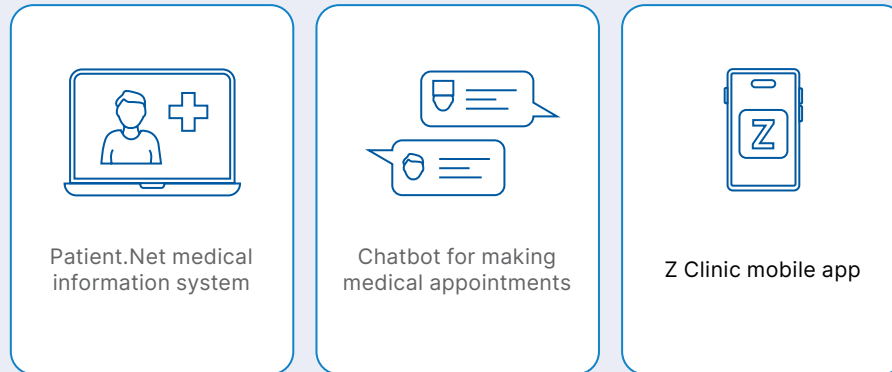
Healthcare centres at Kola Division – plans

- 6 MRI module**
 - Q2 2023
 - 220 sq m
 - 8a Kirova Street, Monchegorsk (premises of the Kolsky Health and Spa Centre)
 - The module and advanced MRI equipment (manufactured by Siemens) delivered, licensing is underway
 - The centre will be included in the government guarantee programme
 - Project cost – RUB 211 mln
- 7 Preventive Center KCZ**
 - 2024
 - 1,500–2,000 sq m
 - 8a Kirova Street, Monchegorsk (premises of the Kolsky Health and Spa Centre)
 - FEED

Digital Medicine

Nornickel has an ecosystem of Digital Medicine services. Employees can use a mobile app for viewing their medical records, booking a medical appointment and finding all the necessary information about healthcare centres. The most popular services were added to the Nika corporate assistant and integrated into Nornickel's superapp. The medical information system has been launched in 2022 in Norilsk and in 2021 in Zapolyarye Health Resort.

Mobile app and chatbot information system



Nornickel has also been active in promoting healthy lifestyle programmes. It is planning to launch several services to provide access to employees from all regions to relevant expert advice on healthy lifestyle and disease prevention.

Emergency preparedness

At Nornickel, we take a holistic approach to occupational health and safety, placing a strong emphasis on ensuring reliability of equipment and technological processes, preventing emergencies and addressing their impact on the environment and local communities.

To avoid occupational accidents, Nornickel implements risk-based occupational health and safety management.

For more details, please see [the Internal Control and Risk Management section](#).

In 2020, after the CHP-3 fuel spill, as part of the efforts to mitigate permafrost thawing risks and to prevent such emergencies

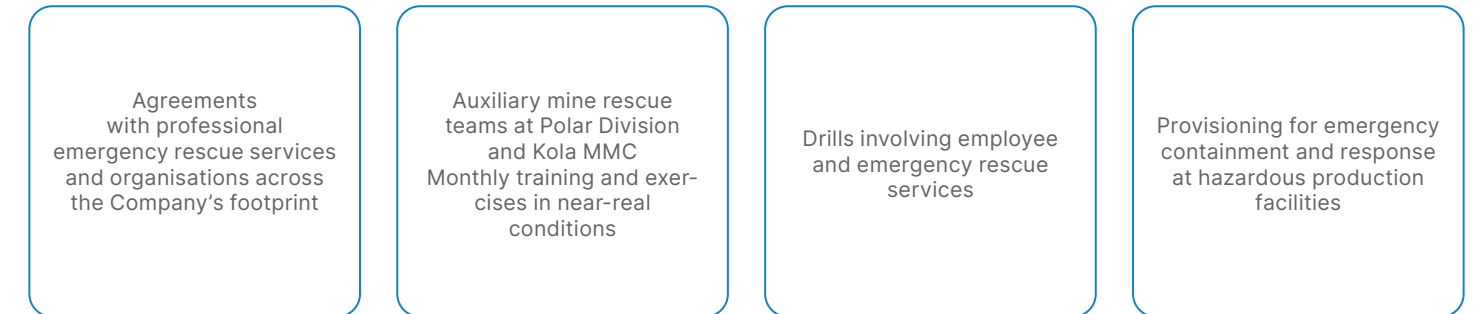
in the future, NTEC launched the Buildings and Structures Monitoring System project designed to develop and deploy a comprehensive automated monitoring system for foundations and foundation soils in the Norilsk Industrial District. Capabilities under the first stage of the Projects have been successfully put into operation, with the automated monitoring systems covering 165 facilities (over 1,200 sensors deployed) and feeding data to the centralised IT platform. The Project's objective is to ensure comprehensive automated monitoring for the safe operation of the Company's assets, including for assessing the progress of permafrost thawing in the context of global climate change.

For more details, please see [the Climate change and energy efficiency section](#).

Nornickel's facilities remain prepared for any emergencies, including emergency containment and response. This is vital as the Company operates more than 300 hazardous production facilities that rely on hazardous substances in their operational processes. Preparedness for emergencies is in line with Federal Law No. 116-FZ On Industrial Safety of Hazardous Production Facilities dated 21 July 1997.

Emergency preparedness system at hazardous production facilities

Emergency containment and response plans at hazardous production facilities (hazard classes 1, 2, 3)



The Group companies put in place surveillance, warning, communication and support systems in case of emergency

The underlying document for emergency containment and response plans is the Regulations on Containment and Elimination of Accident Consequences at Hazardous Production Facilities approved

by Resolution No. 1437 of the Russian Government dated 15 September 2020. They are approved by heads (deputy heads) of production units that operate such facilities, and heads (deputy heads

responsible for approving action plans) of professional emergency rescue services and units engaged for emergency containment and response.

To ensure readiness for containment and elimination of accident consequences at hazardous production facilities, Polar Division signed contracts with a professional emergency rescue unit for mine rescue services and the maintenance of auxiliary rescue teams' equipment. Auxiliary mine rescue teams were set up at Polar Division and Kola MMC hazardous production facilities (hazard classes 1 and 2) engaged in underground mining operations. Polar Division, Medvezhy Ruchey, Norilsk Production Support Complex, GRK Bystrinskoe, and Kola MMC hazardous facilities put in place surveillance, warning, communication, and support systems to rely on in case of emergencies. Mines are equipped with radio and positioning

The plans are reviewed and approved in a timely manner, their effective periods being:

For underground mining facilities	6 months
For open-pit mining facilities	1 year
For hazard classes 1, 2 and 3 facilities ¹	5 years

systems for employees, and telemetry system for underground machinery to track their locations. Hazard class 1 and 2 facilities operate local warning systems.

At the Group's hazardous production facilities, drills are held regularly and the personnel is trained to deal with accidents, incidents, and emergencies.

¹ Excluding facilities specified in the first two lines of this table.