

Stakeholder engagement

GRI 2-29

Building mutually beneficial long-term relationships with stakeholders is at the core of our efforts to achieve the Company's goals and maintain nimble and robust risk management.

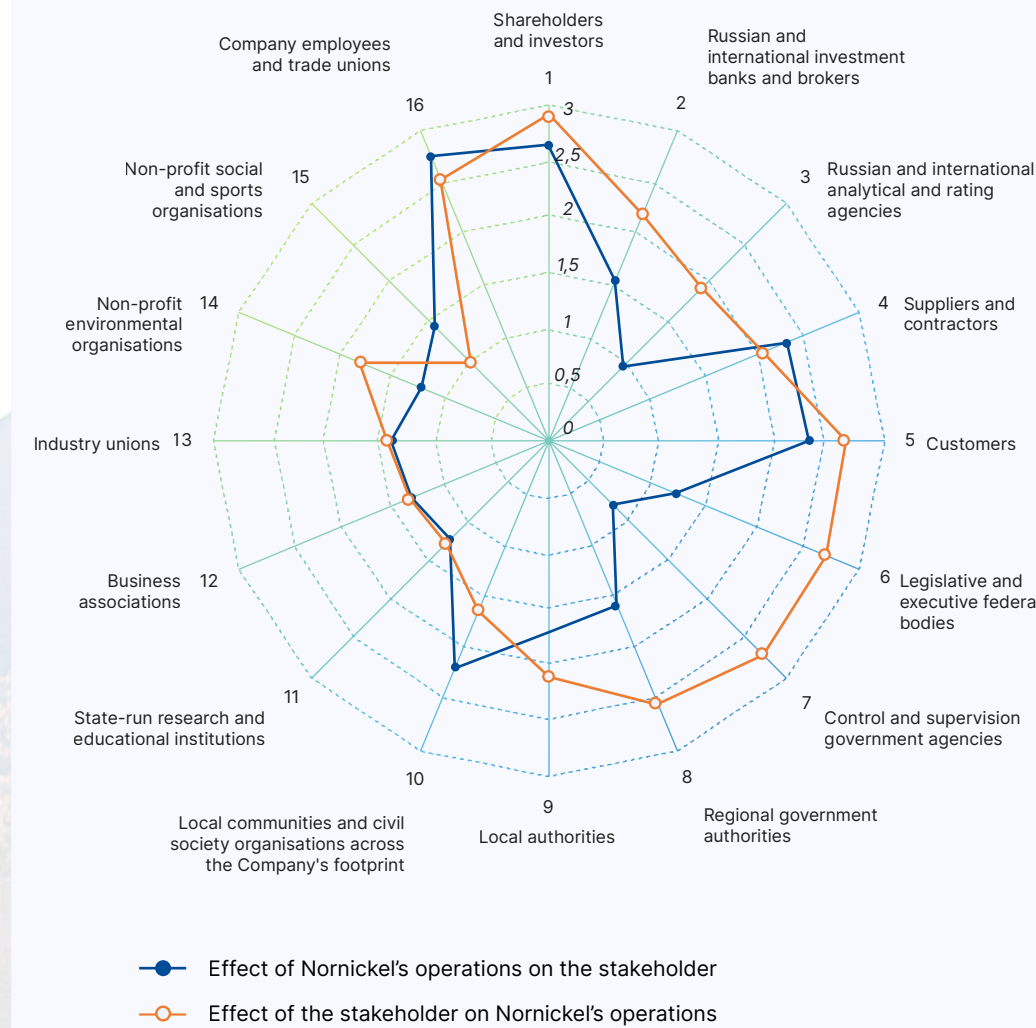
Nornickel's cooperation with government bodies, local authorities, non-profit organisations and local communities is guided by strict compliance with Russian laws and regional and municipal regulations, mutual respect of interests, and social responsibility.

The key principles, duties, initiatives and procedures related to stakeholder engagement are outlined in the Company's by-laws¹. We maintain dialogue with stakeholders in line with international standards and accountability principles².

In 2022, Nornickel reaffirmed its commitment to transparency by providing stakeholders with regular updates on the Company's operational and financial performance, its financial position, social programmes for employees and local residents, and events and progress on the ESG agenda. The Company took steps to collect feedback on stakeholder satisfaction with the quality and flow of the Company's information and the compliance with the principles set out in its Information Policy Regulations.

Stakeholder map³

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Shareholders, investors, brokers (1-2)

Interests

- Capitalisation and liquidity growth
- Distribution of earnings
- The Company's sustainable development
- Maintaining investment grade credit ratings, improving ESG ratings

Interaction mechanisms

- General Meeting of Shareholders
- One-on-one communication, phone calls and emails (meetings, conference calls)
- Website presentations and press releases
- Site visits
- Conferences and forums

2022 highlights

- Over 100 investor calls and meetings held

➔ For more details, please see the Corporate Governance section

Analytical and rating agencies (3)

Interests

- Impact of the Company's operations on industry, society and environment
- Transparency of information and timely disclosure of key facts

Interaction mechanisms

- Meetings, conference calls
- Website presentations and press releases
- Phone calls and emails

2022 highlights

- Participation in Sustainalytics, EcoVadis, and MSCI ESG ratings

➔ For more details, please see the Sustainability Management section

¹ MMC Norilsk Nickel's Stakeholder Engagement Policy, Kola MMC's Stakeholder Engagement Procedure, MMC Norilsk Nickel's Business Ethics Code and other by-laws are available on [the Company's official website](#).

² AA1000AP (AA1000 Accountability Principles), AA1000SES (AA1000 Stakeholder Engagement Standard).

³ Put together based on surveys of the Company's managers and employees.

Suppliers and contractors (4)

Interests

- Streamlining procurement as regards timelines and engagement procedures
- Accessibility of procurement procedures
- Participation in the Company's projects

Interaction mechanisms

- Meetings, conferences, in-person and online negotiations
- Long-term agreements (contracts)
- Supplier assessment and surveying
- Interaction through the Shipment Notice and SAP SRM portals

2022 highlights

- Comprehensive risk-oriented screening completed with respect to suppliers of mineral resources
- The Group's companies and branches connected to SAP SRM, over 10,000 suppliers registered in the system

➔ For more details, please see the Supply Chain Responsibility section.

Customers (5)

Interests

- Product quality
- Packaging and labelling
- Information support of transactions
- Delivery terms
- Sustainable growth of sales markets and registration of products in these markets
- The Company's ESG activities

Interaction mechanisms

- Official meetings, conferences, exhibitions
- Annual customer satisfaction surveys
- Working with customers (processing customer complaints and grievances and responding to them, analysing consumption trends and perspectives)
- Working with regulators and commodity exchanges

2022 highlights

- The customer satisfaction score came in at 2.85, which is fully in line with Nornickel's target

➔ For more details, please see the Customer Satisfaction subsection

Federal authorities, control and supervision agencies (6-7)

Interests

- Implementation of socially important projects
- Compliance and regulatory improvements
- Discussion of draft regulations
- Business climate improvement
- Environmental protection
- Support for domestic producers

Interaction mechanisms

- Participation in working and expert groups, commissions, and committees
- Public events and conferences

2022 highlights

- A cooperation agreement signed by Nornickel and Rospirodnadzor to preserve the environment and ensure environmental safety

➔ For more details, please see the Tax Strategy and Development of Local Communities sections

Representatives of regional authorities (8-10)

Interests

- Stable tax payments
- Environmental protection
- Contribution to social stability, including creation of new jobs
- SME support
- Training of highly skilled professionals

Interaction mechanisms

- Working and expert groups, commissions, committees and councils
- One-on-one negotiations, working meetings
- Cooperation agreements
- Implementation of investment agreements
- Forums, conferences, fairs, and round table discussions

2022 highlights

- Initiatives implemented as part of the Norilsk renovation project (opening of a fire station, overhaul of the Integrated Social Service Centre)

➔ For more details, please see the Development of Local Communities section

Non-profit organisations (11-15)

Interests

- Environmental protection
- Promoting innovations and educational programmes
- Developing sports in regions
- Discussing draft regulations
- Drafting social and economic development plans and investment programmes
- Improving business climate

Interaction mechanisms

- Working and expert groups, commissions, committees and councils
- Joint R&D and business projects
- Open dialogues, working meetings
- Forums, conferences, fairs, and round table discussions
- Participation in dedicated public events and expert organisations to discuss key issues

2022 highlights

- Big Scientific Expedition held
- Nornickel took part in the COP27 climate change conference
- Events held as part of the World of New Opportunities programme (30,000 participants)

➔ For more details, please see the Environmental management and Development of Local Communities sections

Employees and trade unions (16)

Interests

- Social benefits and guarantees
- Decent salaries
- Favourable and safe working conditions
- Company's stability as an employer

Interaction mechanisms

- Joint commissions, committees and working groups; discussions with trade unions and labour councils
- Offices for operational, social and labour matters
- Targeted polls, research focusing on engagement measurements and efficiency of social programmes
- Corporate media, booklets, information screens and boards, online portal

2022 highlights

- Nornickel Live, a Q&A session; spring corporate dialogues
- New corporate portal implemented; the Nika chatbot actively used

➔ For more details, please see the HR Management and Social Partnership and Social Policy sections

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Dialogue with investors



Over **100**
investor meeting
and calls in 2022

Nornickel maintains active dialogue with a wide range of Russian and international investors and equity analysts via conference calls and meetings, investment conferences and site visits. In addition, we hold annual Investor Day attended by the Company's senior management to discuss our strategic development.

In 2022, Nornickel continued to operate in conformity with the high international standards on disclosure. The Company

uses different channels to reach out to stakeholders such as press releases, presentations, annual and sustainability reports, corporate action notices, as well as interactive tools. Nornickel publishes its reports in the Russian and English languages. Investor information is available in the Investors section on the Company's website.

In 2022, the Company held over 100 meetings and calls with investors.

Dialogue with local communities



Continuous work of regional
development centres

Nornickel contributes to better lives for the local communities affected by the Company's operations across its footprint. Nornickel takes account of their interests, opinions and preferences, as well as their history, culture, traditions, way of life and historic heritage. To make this possible, the Company organises various activities, themed studies and surveys, focus group sessions and open dialogue events.

The Norilsk Development Agency, the Monchegorsk Development Agency and the Second School

Centre for community initiatives of the Pechengsky District (territorial development institutions established with Nornickel's support) contribute to creating conditions for improving quality of life, developing social environment and ensuring human capital growth in the regions where the Company operates.

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

Dialogue with employees



Up to **63%**
growth in employee
engagement

Continuous open communication with employees is the backbone of efficient governance. The Company has been developing a social partnership framework regulating labour relations and has in place offices for social and labour relations, a response centre and task forces at divisions.

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

To increase employee awareness, improve trust between workers and leadership and raise employee engagement, Nornickel carried out the following activities in 2022:

- the Company expanded and improved its communication channels (30,000 employees used the new corporate portal, over 60,000 people used NIKA chatbot);

- the Company's Vice-Presidents held Norilsk Live, a Q&A session, which gained over 15,000 views;
- Nornickel carried out 50 corporate dialogue sessions, during which almost 5,000 questions were asked;
- the Company ran eight information campaigns, with a total audience of more than 250,000 people.

The efforts to improve employee communication have contributed to higher engagement — the engagement index increased by 7 p.p. from 56% to 63% from 2021.

For more details, please see [the Engagement section](#).

The Company has the Corporate Trust Line in place enabling its employees to report any violations of law and standards of conduct and ethics.

Dialogue with business partners



Satisfaction level:
2.85
(out of 3.0)

Customers

In 2022, the Company supplied its products to 34 countries. Nornickel runs a global network of representative and sales offices in Russia, China, the USA, and Switzerland. The Company's primary focus is on direct sales.

To build effective trust-based relationships with customers and raise customer satisfaction level, the Company carries out surveys and monitors compliance with contractual terms on an ongoing basis. In 2022, the customer satisfaction level stood at 2.9 points out of 3.

Suppliers

All suppliers are checked for compliance with certain requirements, including those related to the ESG-agenda. To control compliance and select the best suppliers, Nornickel has rolled out a special due diligence management system across all its divisions. To ensure efficiency and transparency of its procurement activities, Nornickel uses SAP SRM, an automated system for supplier relationship management.

Environmental protection dialogue



2
important agreements
with Rosprirodnadzor

The Company is actively involved in key law-making initiatives related to environmental protection, natural resource use, including subsoil use, as well as economy of natural resource use.

In the reporting year, Nornickel held the 9th Ecological Forum themed "Ecology and Production. Challenges, Trends and Technologies", participated in the Industrial Ecology conference and organised public dialogue meetings.

In 2022, Nornickel and Rosprirodnadzor signed two agreements to preserve the environment and ensure environmental safety. They establish a framework for the exchange

of information, joint implementation of environmental activities, and the provision of advice by Rosprirodnadzor on Nornickel's high-potential investment projects, a first-of-its-kind cooperation initiative in Russia to provide a business with expert opinion and expert evaluation of environmental plans.

Environmental protection is also fostered through volunteering, which brings together the Company's employees, local communities and government authorities. One of the Company's major projects is the Let's Do It annual environmental marathon encouraging people to clean up their local areas and plant trees.



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.

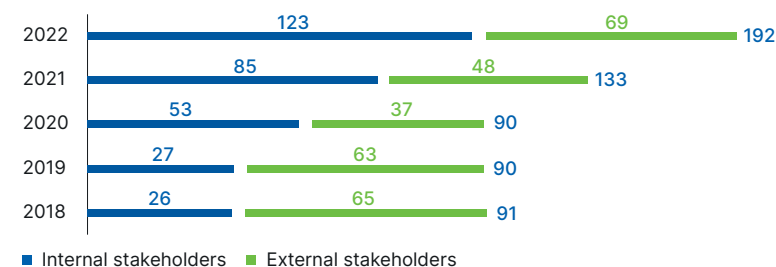
The Company's experts engage in debates on draft regulations organised by community councils of the federal executive bodies, anti-corruption due diligence, and regulatory impact assessments. All of that helps maintain a constructive dialogue with the government, cut administrative red tape and improve 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

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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'.