

APPENDICES



# REPORT BOUNDARIES

GRI 2-2

## Reporting boundaries

Over 20 years of non-financial reporting, the Company has established an information collection system configured in such a way that entities of Nor Nickel Group<sup>1</sup> provide the working group responsible for the report preparation with information on the most material topics and aspects of their operations in terms of social and environmental impact. The boundaries of information consolidation as part of GRI disclosure in the Report may vary and depend on whether a particular entity has significant economic, environmental, and social impacts.

The criteria for including an entity in the data collection boundaries depend on the specific indicator and are set out in the Company's by-laws. Examples of criteria for economic and production indicators include mining, ore concentration, metals production, inclusion of an entity in the IFRS reporting; for environmental indicators – completion of statutory statistical reporting forms; for personnel-related indicators – the entity's average headcount of more than 500 people, etc.

The reporting boundaries include data on Russian business units. Currently, the possibility to collect, independently verify, and disclose information on foreign

entities is limited. The Group's only significant foreign production entity, Norilsk Nickel Harjavalta, discloses sustainability data on its [official website](#) as a separate set of indicators (ESG-Databook). Other foreign business units are insignificant in terms of sustainability impacts.

Furthermore, the reporting boundaries do not include investment assets that are outside the Group's control unless they form a significant part of the Group's production chain. In 2023, the Company did not carry out any major mergers or acquisitions that would have a significant impact on the reporting boundaries.

## Reporting boundaries for material topics

### Legend

<span style="color: blue;">●</span> All assets of the Subgroup are included	<span style="color: green;">●</span> Assets of the Subgroup with the most significant impacts are included	<span style="color: orange;">●</span> Entities of the Subgroup are not included
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Material topics	GRI disclosures	Norilsk Division	Kola Division <sup>1</sup>	Trans-Baikal Division	Energy Division	Sales Division <sup>1</sup>	Head Office	Other Group assets
Training and education	404-1, 404-2	●	●	●	●	●	●	●
Employment and decent working conditions in the regions of operation	201-3	●	●	●	●	●	●	●
	202-1, 202-2	●	●	●	●	●	●	●
	401-1, 401-2	●	●	●	●	●	●	●
	403-6	●	●	●	●	●	●	●
Contribution to the development of local communities	404-3	●	●	●	●	●	●	●
	201-1	●	●	●	●	●	●	●
	203-1, 203-2	●	●	●	●	●	●	●
Contribution to the national industry by promoting Russian technology	207-1, 207-2, 207-3	●	●	●	●	●	●	●
	–	●	●	●	●	●	●	●
Innovation projects pursuing sustainable development goals	–	●	●	●	●	●	●	●
Climate change	201-2	●	●	●	●	●	●	●
	302-1, 302-3, 302-4	●	●	●	●	●	●	●
	305-1–305-5	●	●	●	●	●	●	●
Emissions	305-7	●	●	●	●	●	●	●
Waste management	306-1–306-5	●	●	●	●	●	●	●
Occupational health and safety	403-1–403-5, 403-8–403-10	●	●	●	●	●	●	●
Biodiversity	304-1–304-4	●	●	●	●	●	●	●
Water consumption and wastewater discharge	303-1–303-5	●	●	●	●	●	●	●
Industrial environmental safety of production facilities (including tailings dumps)	–	●	●	●	●	●	●	●

<sup>1</sup> In total, Norilsk Nickel Group consists of more than 90 Russian and foreign entities. A detailed list of entities in the perimeter of the Group's IFRS financial statements is available at [Company website](#).

<sup>1</sup> Excluding foreign business units.

Material topics	GRI disclosures	Norilsk Division	Kola Division <sup>1</sup>	Trans-Baikal Division	Energy Division	Sales Division <sup>1</sup>	Head Office	Other Group assets
Responsible exploration and land reclamation	–	●	●	●	●	●	●	●
Impact of transport on water bodies	–	●	●	●	●	●	●	●
Supply chain responsibility	308-1, 308-2, 414-1, 414-2	●	●	●	●	●	●	●
Corporate governance and risk management	2-9–2-20	●	●	●	●	●	●	●
Anti-corruption and business ethics	205-1, 205-2, 205-3	●	●	●	●	●	●	●
Respect for human rights (including those of indigenous minorities)	401-3	●	●	●	●	●	●	●
	402-1	●	●	●	●	●	●	●
	405-1	●	●	●	●	●	●	●
	406-1	●	●	●	●	●	●	●
	407-1	●	●	●	●	●	●	●
	408-1	●	●	●	●	●	●	●
	409-1	●	●	●	●	●	●	●
	411-1	●	●	●	●	●	●	●
413-2	●	●	●	●	●	●	●	

# DEFINITION OF MATERIAL TOPICS

## GRI 3-1, 3-2

Nornickel identifies material topics on an annual basis in accordance with the international GRI Standards, which

provide for a comprehensive assessment of sustainability impacts, taking into account feedback from stakeholders.

In 2023, the Company approved an appropriate procedure consisting of the following stages:

Stage	Description	Results
Stage 1. Identifying impacts	Nornickel's Sustainable Development Department supported by external consultants (the "Working Group") made a base list of the Company's actual and potential economic, environmental, and social impacts, including those related to human rights. This list includes 27 sustainable development impacts of the Company. Analysis of the Company's business context <sup>1</sup> identified no impacts other than in 2022	List of 27 actual and potential impacts of the Company.
Stage 2. Assessing impacts	In an online questionnaire, external and internal stakeholders were asked to rate potential and actual impacts on a scale of 0 to 5 based on the key parameters recommended by the GRI Standards: <ul style="list-style-type: none"> <li>likelihood/regularity of impact;</li> <li>severity of impact (including irreversibility of impact<sup>2</sup>);</li> <li>scope (scale) of impact.</li> </ul> <p>The respondents were also given the opportunity to assess the quality of disclosure of material sustainability topics in the <a href="#">2022 Sustainability Report</a> and make comments and suggestions on topics of particular interest. This Reports reflects most of the comments.</p> <p>The Working Group analysed all the questionnaires for adequacy and completeness. Non-identifiable, partially completed, and improperly completed questionnaires were excluded from the final analysis.</p> <p>In 2023, 361 questionnaires (23% completed by external stakeholders, 77% completed by internal stakeholders) were taken into account to assess impacts. The number of questionnaires received and taken into account is 63.3% higher than in 2022</p>	361 questionnaires with impact assessments completed by stakeholders

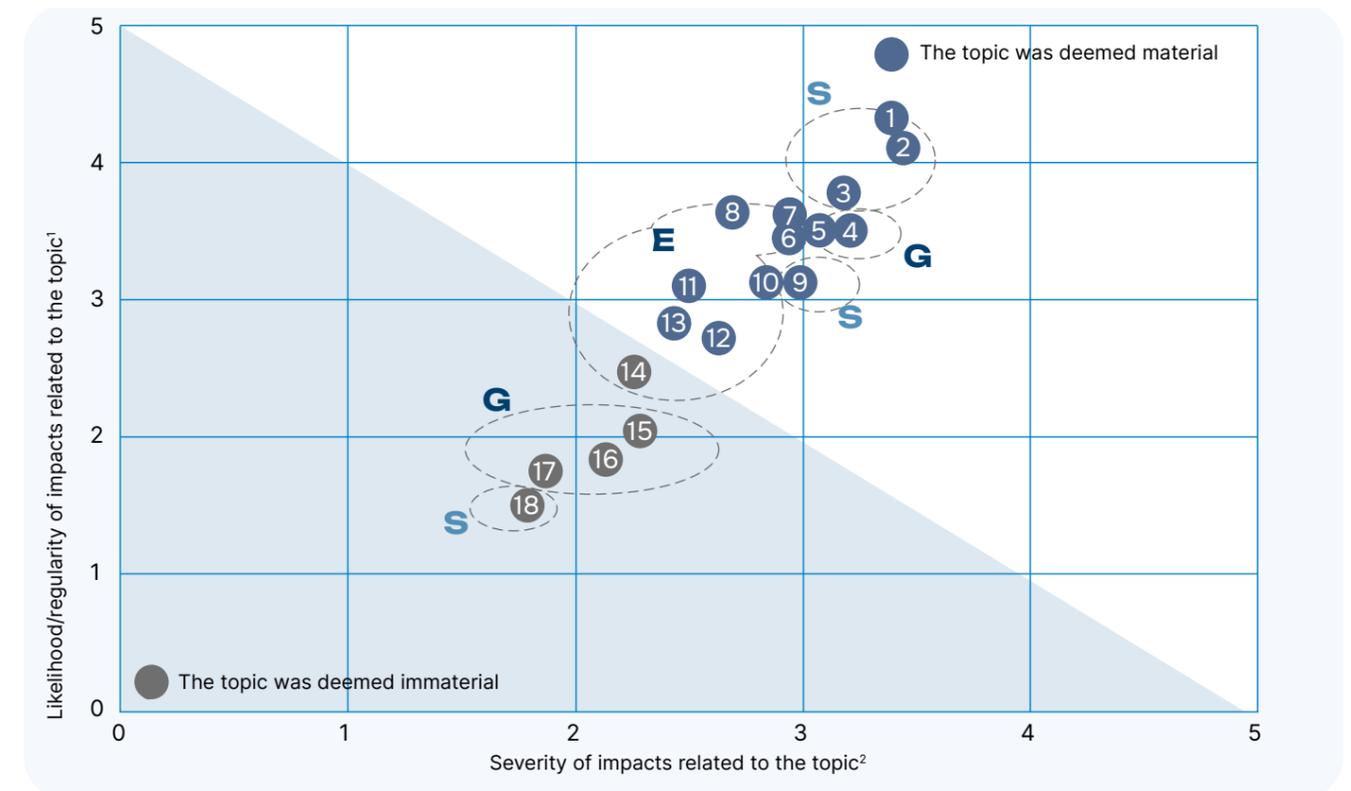
<sup>1</sup> Excluding foreign business units.

<sup>1</sup> Including core activities, business relationships, and sustainability context.

<sup>2</sup> Respondents assessed the irreversibility of impacts based on a Y/N scale.

Stage	Description	Results
Stage 3. Making a prioritised list of topics	<p>In the analysis of questionnaires completed by stakeholders, average scores were calculated for all impacts.</p> <p>For each impact, the severity of the impact was determined (average score for impact severity based on the irreversibility factor and impact scale (scope)), and the likelihood/regularity of the impact was assessed.</p> <p>All impacts were grouped into 18 topics in order to comprehensively analyse and subsequently generate a list of material topics.</p> <p>A materiality matrix reflecting the relative significance of the topics was plotted on the Severity of Impact and Likelihood/Regularity of Impact axes.</p> <p>The Company has set cut-off thresholds for the materiality boundary in the matrix. A value of 5.0 on the sum of coordinate values (rounded) was selected as the cut-off point – 50% of the maximum score. Topics falling below the boundary are deemed non-significant, but information on them is also presented in the Report in accordance with the needs of stakeholders. For immaterial topics, incomplete disclosure of GRI indicators is allowed</p>	List and matrix of 18 topics to be discussed with stakeholders in an open dialogue
Stage 4. Engaging in dialogue with stakeholders	The matrix of material topics generated in the third stage was presented to stakeholders in a dialogue held on 27 November 2023 in a mixed format (offline with a live webcast). Stakeholders reviewed the results and made recommendations on the Report and the details of topics disclosure in the Report	List of stakeholder recommendations to the Report
Stage 5. Finalising the list of material topics	The materiality matrix, which is a result of materiality assessment, was finalised	Finalised matrix with 13 material topics (see below)

## Materiality matrix



### Prioritised list of topics and associated impacts<sup>3</sup>

No.	Topic wording	Sustainability impacts
1	Training and education	Training and education
2	Employment and decent working conditions in the regions of operation	Employment and decent working conditions in the regions of operation
3	Contribution to the development of local communities	<p>Payment of taxes to budgets of various levels</p> <p>The Company's charitable activities targeting local communities (including indigenous minorities) and non-profit organisations to support sustainable development</p> <p>Development of housing, energy, and other infrastructure in the regions of operation</p> <p>Support for entrepreneurship in the regions of operation</p>
4	Contribution to the national industry through import substitution	Contribution to the national industry by promoting Russian technology
5	Innovation projects pursuing sustainable development goals	Innovation projects pursuing sustainable development goals

<sup>1</sup> On a scale of 0 to 5, where 0 means no impact and 5 means that impact occurs and is ongoing.

<sup>2</sup> The average value for the severity of impact (the parameter was assessed on a scale from 0 to 5, where 0 means no effect and 5 – critical effect) and scale and scope of impacts (the parameter was assessed on a scale from 0 to 5, where 0 means no impact and 5 – international scale).

<sup>3</sup> Following the prioritisation, the first 13 topics were found to be material.

No.	Topic wording	Sustainability impacts
6	Climate change	Greenhouse gas emissions Development of a climate change monitoring system Metals production needed to combat climate change
7	Emissions	Emissions of sulphur dioxide and other pollutants
8	Waste management	Generation of industrial waste from operations
9	Occupational health and safety	OHS risks for employees and contractors Work-related injuries Occupational disease risks for employees and contractors
10	Biodiversity	Impact on biodiversity in the regions of industrial operations
11	Water consumption and wastewater discharge	Wastewater discharge to water bodies Water withdrawal from water bodies
12	Industrial environmental safety of production facilities (including tailing dumps)	Tailings risks Industrial environmental safety risks
13	Responsible exploration and land reclamation	Land disturbance
14	Impact of transport on water bodies	Pollution of water bodies by sea and river transport
15	Supply chain responsibility	Risks related to the violation of sustainability principles in the supply chain
16	Corporate governance and risk management	Risks related to inadequate corporate governance and risk management
17	Anti-corruption and business ethics	Corruption and business ethics risks
18	Respect for human rights (including those of indigenous minorities)	Risks related to the violation of employee and contractor rights (including wrongdoings, discrimination, etc.) Risks related to the violation of fundamental rights of local communities in the regions of operation (including indigenous minorities)

The final list of material topics contains a number of changes as compared to 2022:

- the most important material topics were Training and Education Employment and Decent Working Conditions in the Regions of Operation, and Contribution to the Development of Local Communities, which means that the importance of the Company's social programmes and commitments to key stakeholders is growing;

- a high level of importance of special topics was noted: Contribution to the National Industry through Import Substitution (the topic rose from the seventh position in 2022 to the fourth position in 2023), Innovation Projects Pursuing Sustainable Development Goals (the topic remained in the Top 5 in 2023) – new technologies created by the Company contribute to objectives of the ESG strategy;

- the topics Impact of Transport on Water Bodies and Supply Chain Responsibility were not included in the list of GRI's material topics for 2023.

→ [For the description of impacts related to material topics, please see the 2022 Sustainability Report.](#)

# GRI CONTENT INDEX

Nornickel prepared the Report in accordance with the GRI Standards for the period from 1 January 2023 to 31 December 2023.

Disclosure number	Disclosure	Page/link	Assured by the auditor	Omission	Comments
<b>GRI 1: Foundation 2021</b>					
<b>GRI 2: General Disclosures 2021</b>					
<b>1. The organisation and its reporting practices</b>					
2-1	Organisational details	2, 16	Assured		Nature of ownership – private.
2-2	Entities included in the organisation's sustainability reporting	384	Assured		For a list of entities included in the financial statements of Norilsk Nickel Group, please see the Group's <a href="#">IFRS financial statements</a>
2-3	Reporting period, frequency and contact point	2, 477	Assured		Financial and sustainability reporting is prepared annually for the calendar year. The date of this report is 23 May 2024.
2-4	Restatements of information	2	Assured		Information on changes in previous periods' data is provided in the report in the footnotes below the respective figures.
2-5	External assurance	2, 472	Assured		
<b>2. Activities and workers</b>					
2-6	Activities, value chain and other business relationships	16, 38, 351	Assured		There were no significant changes in the supply chain of the core production process in the reporting year. Due to sanctions imposed on the Russian Federation, the Company is in the process of revising its list of equipment and software suppliers.
2-7	Employees	78, 424	Assured		
2-8	Workers who are not full-time employees	424	Assured		The relations with such employees are mainly formalised through civil law contracts. Such contracts are usually made for temporary work, without any prevailing type of activity. There are no significant hiring fluctuations within the reporting periods, and the changes from one reporting period to another may be associated with an increasing number of FTEs (a part of the functions handed over to FTEs).
<b>3. Governance</b>					
2-9	Governance structure and composition	60, 77, 128, 174, 256, 290, 295, 301, 316, 343	Assured		

Disclosure number	Disclosure	Page/link	Assured by the auditor	Omission	Comments
2-10	Nomination and selection of the highest governance body	290	Assured		
2-11	Chair of the highest governance body	290	Assured		The Chairman of the Board of Directors is not an executive director.
2-12	Role of the highest governance body in overseeing the management of impacts	60, 77, 128, 174, 215, 256, 290, 292, 295, 301, 316, 343	Assured		
2-13	Delegation of responsibility for managing impacts	60, 77, 128, 174, 215, 256, 290, 295, 297, 301, 316, 343	Assured		
2-14	Role of the highest governance body in sustainability reporting	215	Assured		The Sustainability Report, including the list of material topics, was approved by the Board of Directors, No. GMK/12-pr-sd dated 22.05.2024
2-15	Conflicts of interest	297	Assured		The Company publicly discloses information on related-party transactions in its annual reports.
2-16	Communication of critical concerns	292, 301, 334	Assured		
2-17	Collective knowledge of the highest governance body	294	Assured		
2-18	Evaluation of the performance of the highest governance body	294	Assured		
2-19	Remuneration policies	298	Assured		There are no termination or retirement benefits for members of the Board of Directors, as they are not employees of the Company <sup>1</sup> . The Company's management are subject to the same termination and retirement benefit rules as other employees of the Company.
2-20	Process to determine remuneration	298	Assured	Information on 2-20 b is not disclosed as not applicable.	There are no consultants on remuneration matters. In the reporting year, stakeholders (including shareholders) did not review the rules of the Board of Directors' remuneration.
2-21	Annual total compensation ratio	—	Not assured	Information has not been disclosed due to the protection of the personal data of the highest paid executive.	

<sup>1</sup> Except for members who are employees of the Company.

Disclosure number	Disclosure	Page/link	Assured by the auditor	Omission	Comments
<b>4. Strategy, policies and practices</b>					
2-22	Statement on sustainable development strategy	6, 8	Assured		
2-23	Policy commitments	38, 218, 326	Assured		For sustainable development policies and statements, please see the <a href="#">Company's corporate website</a> .
2-24	Embedding policy commitments	38, 58	Assured		The Company's employees are familiarised with by-laws upon hiring and in internal training sessions conducted by Norinickel.
					Suppliers and contractors of the Company are familiarised with by-laws when entering into contracts if it is stipulated by provisions of the contracts.
2-25	Processes to remediate negative impacts	334	Assured		For information on the commitment to assess negative impacts and address the situation, please see MMC Norilsk <a href="#">Nickel's Human Rights Policy</a> .
2-26	Mechanisms for seeking advice and raising concerns	66, 99, 140, 177, 334	Assured		
2-27	Compliance with laws and regulations	432	Assured		Significant cases of non-compliance with laws/regulations resulting in fines or non-financial penalties are understood as events disclosed in section 26 of the Notes to the IFRS annual consolidated financial statements and/or receiving adverse publicity. There have been no such cases in 2023.
2-28	Membership associations	62, 449	Assured		
<b>5. Stakeholder Engagement</b>					
2-29	Approach to stakeholder engagement	65, 67	Assured		
2-30	Collective bargaining agreements	100	Assured		
<b>GRI 3: Material Topics 2021</b>					
<b>Disclosures on material topics</b>					
3-1	Process to determine material topics	387	Assured		
3-2	List of material topics	387	Assured		

Disclosure number	Disclosure	Page/link	Assured by the auditor	Omission	Comments
<b>Training and education</b>					
3-3	Management of material topics	91 <a href="#">2022 Sustainability Report, page 312</a>	Assured		Collecting feedback from trainees and assessing their satisfaction serve to assess the effectiveness of training.
404-1	Average hours of training per year per employee	92	Assured		
404-2	Programmes for upgrading employee skills and transition assistance programmes	94, 112	Assured		
<b>Employment and decent working conditions in the regions of operation</b>					
3-3	Management of material topics	76, 83, 155 <a href="#">2022 Sustainability Report, page 311</a>	Assured		The <a href="#">Equal Opportunities Programme</a> defines the Company's approaches and commitments in providing jobs.  The <a href="#">Working Conditions Policy</a> sets forth the principles and commitments in ensuring decent working conditions.
201-3	Defined benefit plan obligations and other retirement plans	107	Assured		Payments under the pension plan are made by NPF GAZFOND Pension Savings. For the fund's public reports, please see the website at <a href="https://gazfond-pn.ru/about/disclosure/">https://gazfond-pn.ru/about/disclosure/</a>
202-1	Ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation	86	Assured	Ratios of minimum level wage by gender compared to local minimum wage at significant locations of operation are not provided due to the lack of relevant accounting system. The Company will consider disclosing this information within three years	The calculation covers the Group's companies with an average headcount of at least 500 employees in 2023.
202-2	Proportion of senior management at significant locations of operation hired from the local community	79	Assured		
401-1	New employee hires and employee turnover	81, 82, 426	Assured		

Disclosure number	Disclosure	Page/link	Assured by the auditor	Omission	Comments
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	422, 423, 424	Assured	The indicator is partially disclosed. No information is provided for the following types of benefits: life insurance, healthcare, disability/ temporary disability coverage, childcare leave and share ownership due to the lack of an approved disclosure methodology for this type of data. The Company will consider disclosing this information within three years.	
403-6	Promotion of worker health	103, 106, 144	Assured		The Company respects employees' right to privacy and ensures confidentiality of information relating to their health. Health information is classified as a special category of personal data and is processed in full compliance with the applicable laws. The Labour Code prevents employers from requesting any information on employee health unless it is required for decision-making on the employee's performance of their job functions). The Company does not use data on participation in targeted healthcare programmes or reliance on healthcare services as criteria to make decisions related to hiring, dismissals, promotions/demotions, etc.
404-3	Percentage of employees receiving regular performance and career development reviews	428	Assured		
<b>Contribution to the development of local communities</b>					
3-3	Management of material topics	152, 154, 156, 158, 180, 186 <a href="#">2022 Sustainability Report, page 312</a>	Assured		
201-1	Direct economic value generated and distributed	406	Assured		
203-1	Infrastructure investments and services supported	153, 158, 171, 190, 380	Assured		
203-2	Significant indirect economic impacts	155, 156, 190, 380	Assured		

Disclosure number	Disclosure	Page/link	Assured by the auditor	Omission	Comments
204-1	Proportion of spending on local suppliers	—	Assured	The indicator is not disclosed in accordance with the GRI requirements due to no accounting system. The Company will consider disclosing this information within three years.	<a href="#">The Development of Local Communities</a> section discloses information on the Company's expenses associated with procurement from suppliers in the key regions of operation.
207-1	Approach to tax	315	Assured		
207-2	Tax governance, control and risk management	316, 334	Assured		
207-3	Stakeholder engagement and management concerns related to tax	317	Assured		Stakeholders' tax-related concerns among their other queries can be addressed as part of the mechanisms of the Corporate Trust Line.
207-4	Country-by-country reporting	—	Assured	The indicator is not disclosed due to the confidential nature of information (this information is a trade secret of the Company).	
413-1	Operations with local community engagement, impact assessments, and development programmes	—	Assured		The share of operations with local community engagement is 4.8% of all business units of the Company.
<b>Contribution to the national industry by promoting Russian technology</b>					
3-3	Management of material topics	38, 370 <a href="#">2022 Sustainability Report</a> , page 312	Assured		As at 31 December 2023, the Company did not adopt policies or set targets as regards contribution to the national industry.
<b>Innovation projects pursuing sustainable development goals</b>					
3-3	Management of material topics	38, 362, 370 <a href="#">2022 Sustainability Report</a> , page 312	Assured		In 2015, Norinickel launched the Technological Breakthrough programme focused on automating process control and enhancing productivity and safety, among other things, by introducing cutting-edge information support and automated systems. No specific commitments have been set for the Innovation Projects Pursuing Sustainable Development Goals topic. For more details, please see MMC Norilsk Nickel's <a href="#">Annual Report for 2023</a> .

Disclosure number	Disclosure	Page/link	Assured by the auditor	Omission	Comments
<b>Climate change</b>					
3-3	Management of material topics	252 <a href="#">2022 Sustainability Report</a> , page 310	Assured		
201-2	Financial implications and other risks and opportunities due to climate change	265	Not assured	Financial implications of the risk are not disclosed as there is no such estimate. Estimating financial implications is planned to be conducted within 3–5 years.	In 2023, climate change expenses, including initiatives to improve energy efficiency and create a system for monitoring buildings and structures located in permafrost areas, amounted to RUB 5.1 bn
302-1	Energy consumption within the organisation	283, 284	Assured		The Company uses statistical reporting forms applicable in Russia to record energy consumption data. TJ recalculation ratios are derived from the GRI 3.0 Guidelines and Engineering Magazine, a Russian R&D reference book.  In its operations, the Company consumes no cooling energy. The Company sells no cooling or steam energy.
302-3	Energy intensity	283	Assured		
302-4	Reduction of energy consumption	284	Assured		Reduction of energy consumption is calculated based on the technical specifications of equipment and other energy-consuming devices that are replaced as part of energy efficiency initiatives (as the difference between the consumption of more energy-efficient new equipment and less energy-efficient old equipment).
305-1	Direct (Scope 1) GHG emissions	276	Assured		To calculate GHG emissions, we used relevant global warming potential ratios disclosed in the IPCC Sixth Assessment Report: 1 for CO <sub>2</sub> , 27 for CH <sub>4</sub> (bio, comb), 29.8 for CH <sub>4</sub> (fug) and 273 for N <sub>2</sub> O
305-2	Energy indirect (Scope 2) GHG emissions	276	Assured		
305-3	Other indirect (Scope 3) GHG emissions	277	Assured		To calculate GHG emissions, we used relevant global warming potential ratios disclosed in the IPCC Sixth Assessment Report, which are 1 for CO <sub>2</sub> , 27 for CH <sub>4</sub> and 273 for N <sub>2</sub> O.  It takes into account the following greenhouse gases: carbon oxide (CO <sub>2</sub> ), nitrous oxide (N <sub>2</sub> O), methane (CH <sub>4</sub> ), with no or insignificant emissions of other greenhouse gases.  Biogenic CO <sub>2</sub> emissions are inapplicable.
305-4	GHG emissions intensity	276	Assured		

Disclosure number	Disclosure	Page/link	Assured by the auditor	Omission	Comments
305-5	Reduction of GHG emissions	—	Assured		<p>In 2023, we prevented GHG emissions of 272.4 kt of CO<sub>2</sub> equivalent, of which 34.4 kt of CO<sub>2</sub> equivalent are Scope 1 emissions eliminated as a result of direct energy saving initiatives, and 237.9 kt of CO<sub>2</sub> equivalent are Scope 2 emissions eliminated through deregulated bilateral purchase agreements for low-carbon electricity signed by the Trans-Baikal Division companies.</p> <p>Calculation of the emissions prevented as a result of direct energy saving initiatives is based on the calculation of the 302-4 indicator (the prevented emissions estimated result from reduced energy consumption).</p>

Emissions

3-3	Management of material topics	220 <a href="#">2022 Sustainability Report, page 311</a>	Assured		
305-7	Nitrogen oxides (NO <sub>x</sub> ), sulphur oxides (SO <sub>x</sub> ), and other significant air emissions	223, 412	Assured	Persistent organic pollutants are not emitted. Hazardous air pollutant emissions are not disclosed as there is no such a category according to the Russian laws.	Emissions of volatile organic compounds (VOCs) in 2023 amounted to 1,910.03 t.

Waste management

3-3	Management of material topics	230 <a href="#">2022 Sustainability Report, page 311</a>	Assured		
306-1	Waste generation and significant waste-related impacts	230	Assured		
306-2	Management of significant waste-related impacts	230, 231	Assured		
306-3	Generation	413, 415	Assured		

306-4	Waste diverted from disposal	231, 413, 415	Assured	Information on the disposal of waste transferred outside the organisation is partially disclosed (without breakdown by type of disposal) due to the lack of relevant accounting systems	Information on waste management methods is disclosed in a breakdown stipulated by the Russian laws (as part of filling the statistic form 2-TP (waste). In the GRI terms, hazard waste is understood as waste of hazard classes 1–4 defined by the Russian laws.
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306-5	Waste directed to disposal	413, 415	Assured	Partially disclosed. Internal waste management practices do not imply energy recovery. Breakdown by incineration with energy recovery and incineration without energy recovery is not provided for the waste transferred to the local municipal solid waste operator, as the operator determines waste treatment techniques at its own discretion. The applicable law does not require that the local municipal solid waste operator provide relevant information to the waste suppliers	
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Health and safety

3-3	Management of material topics	124 <a href="#">2022 Sustainability Report, page 312</a>	Assured		
403-1	Occupational health and safety management system	126, 129, 133	Assured		

Disclosure number	Disclosure	Page/link	Assured by the auditor	Omission	Comments
403-2	Hazard identification, risk assessment, and incident investigation	129, 133	Assured		<p>Identification and assessment of occupational health and safety risks take place at all Group companies covered by the Report on an annual basis or ad hoc as described in the STO KISM 121-211-2017 corporate integrated management standard or similar local standards. The quality for these processes is ensured through compliance of assessment requirements with the above standards. Employees may report workplace hazards through the following channels:</p> <ul style="list-style-type: none"> <li>orally to their head;</li> <li>problem-solving boards available at all sites;</li> <li>report to an OHS structural unit;</li> <li>authorised persons present at OHS committee meetings;</li> <li>staff meetings;</li> <li>work refusal form.</li> </ul> <p>All injuries are investigated by a dedicated commission as stipulated by the national laws.</p>
403-3	Occupational health services	135, 143	Assured		<p>Contractors work on the Company's sites based on a contract that includes mandatory requirements for occupational health and safety. Before the start of a contractor's work, the Company takes a set of preparatory measures to ensure work safety. During the execution of the contract, the contractor undertakes to provide its employees with personal protective equipment on its own. The contractor ensures that sanitary and epidemiological requirements are met and all necessary OHS measures are taken. In the course of its operations, Norinickel monitors contractor employees' compliance with OHS requirements. In addition, the Company provides contractor employees with access to first aid at first-aid posts on production sites.</p>
403-4	Employee participation, consultation, and communication on occupational health and safety	140	Assured		
403-5	Employee training on occupational health and safety	129, 141	Assured		
403-8	Employees covered by an occupational health and safety management system	431	Assured		

Disclosure number	Disclosure	Page/link	Assured by the auditor	Omission	Comments
403-9	Work-related injuries	130, 430	Assured	There are no disclosures on the following: <ul style="list-style-type: none"> <li>contractor injury rates due to the lack of accounting for the number of hours worked;</li> <li>types and causes of non-fatal injuries due to the lack of consolidated accounting.</li> </ul> <p>The Company will consider developing an appropriate accounting system within the next three years.</p>	Data on total registered injuries is shown using the Company's accounting system based on Russian laws.
403-10	Work-related ill health	130, 430	Assured	Types of occupational diseases and the number of fatalities caused by work-related ill health is not disclosed due to the confidential nature of this information and the lack of permission for its use by the government agencies responsible for maintaining and recording such information.	
				The information on work-related ill health among contractors is also not disclosed, as it is impossible to unambiguously determine whether the contractor's ill health is directly caused by working at the Company's facilities.	
				The information on occupational diseases is not disclosed due to the lack of consolidated records. The Company will consider developing an appropriate accounting system within the next three years.	

Disclosure number	Disclosure	Page/link	Assured by the auditor	Omission	Comments
<b>Biodiversity</b>					
3-3	Management of material topics	242 <a href="#">2022 Sustainability Report, page 311</a>	Assured		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	244, 246	Assured		The Company has no sites in protected areas or areas of high biodiversity value.
304-2	Significant impacts of activities, products, and services on biodiversity	246	Assured	The information on the number of affected (unprotected) species and on the reversibility of the impact is not disclosed as it is subject to the Company's further research in biodiversity. The Company will consider disclosing this information within three years	The Company's more than an 80-year-long impact on biodiversity has been scrutinised since 2022 as part of the Big Scientific Expedition.
304-3	Habitats protected or restored	238	Assured		The information is disclosed in accordance with the practice of land rehabilitation (restoration) as per the Russian laws. The completion of land rehabilitation is confirmed by government authorities in relevant documents.
304-4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	251, 416	Assured		
<b>Water consumption and wastewater discharge</b>					
3-3	Management of material topics	225 <a href="#">2022 Sustainability Report, page 311</a>	Assured		
303-1	Interactions with water as a shared resource	225, 228, 409	Assured		Supplier relationships as regards impact on water resources are governed by the <a href="#">Company's Supplier Code of Conduct</a> ; there may be consultations with customers at customer's request.

Disclosure number	Disclosure	Page/link	Assured by the auditor	Omission	Comments
303-2	Management of water discharge-related impacts	225	Assured		The wastewater quality standards of the Company are based on: <ul style="list-style-type: none"> <li>Order of the Ministry of Agriculture of Russia No. 552 On Approval of Water Quality Standards for Water Bodies of Fisheries Significance, Including Standards for Maximum Permissible Concentrations of Harmful Substances in the Waters of Water Bodies of Fisheries Significance dated 13 December 2016;</li> <li>Decree of the Chief State Sanitary Doctor No. 2 On Approval of Sanitary Rules and Norms SanPiN 1.2.3685-21 "Hygienic Standards and Requirements for Safety and/or Harmlessness of the Living Environment for People" dated 28 January 2021.</li> </ul>
303-3	Water withdrawal	225, 227, 407, 408	Assured		The regions where the Company's assets are located are areas of normal and high water availability.  The volume of water withdrawal is recorded using instrumental controls and readings of certified gauges, as well as by indirect methods as may be approved by the relevant territorial office of the Federal Water Resources Agency.
303-4	Water discharge	225, 227, 228, 411	Assured		All water discharged by the Company is not freshwater (in GRI terminology).  In 2023, individual cases of exceeding permissible discharge limits were identified. Key substances eliminated as part of wastewater treatment: suspended solids, dry residue, nitrogen compounds, metals, and phosphates
303-5	Water consumption	225	Assured	Information on the impact that changes in water volumes of water reservoirs (storage basins) have on water bodies is not collected.	Total water consumption in 2023 in line with the GRI 303 (2018) methodology was 168 million m <sup>3</sup> .
<b>Industrial environmental safety of production facilities (including tailing dumps)</b>					
3-3	Management of material topics	148, 234 <a href="#">2022 Sustainability Report, page 311</a>	Assured		
306-3 (2016)	Significant spills	—	Assured		In 2023, there were no significant spills.
<b>Responsible exploration and land reclamation</b>					
3-3	Management of material topics	237 <a href="#">2022 Sustainability Report, page 311</a>	Assured		

Disclosure number	Disclosure	Page/link	Assured by the auditor	Omission	Comments
<b>Responsible supply chain</b>					
308-1	New suppliers that were screened using environmental criteria	—	Assured		The indicator is disclosed partially. In 2023, the existing supply chain due diligence management system applied to suppliers, processors and transporters of metal-containing mineral feedstock (“mineral suppliers”). As part of due diligence exercises, 11 mineral suppliers were assessed in 2023, including against environmental and social criteria. The number of new mineral suppliers to the Company in 2023 is equal to zero. Following the exercise, all audited mineral suppliers met the environmental and social criteria set out in <a href="#">Nornickel’s Supplier Code of Conduct</a> . No significant environmental and social risks have been identified. In 2023, the Company’s ESG assessment for compliance with the Code covered suppliers of goods, works, and services. The results of a pilot survey of selected suppliers are described in detail in the <a href="#">2023 Responsible Supply Chain Report</a> .
308-2	Negative environmental impacts in the supply chain and actions taken	—	Assured		
414-1	New suppliers that were screened using social criteria	—	Assured		
414-2	Negative social impacts in the supply chain and actions taken	—	Assured		
<b>Anti-corruption and business ethics</b>					
205-1	Operations assessed for risks related to corruption	311, 348	Assured		In 2023, the assessment of corruption-related risks <sup>1</sup> covered 74 business units, which is 88% of the total number of the Group’s business units.
205-2	Communication and training about anti-corruption policies and procedures	347	Assured		All members of the Board of Directors carry out their duties in Moscow.  All members of the Board of Directors have been fully briefed on the Company’s anti-corruption policies and procedures. However, in 2023, no dedicated training was conducted for the Board members on anti-corruption policies and methods. The Company will consider conducting such training in the future.  No training on anti-corruption practices is provided to external stakeholders; when contracts are signed, counterparties are familiarised with the Anti-Corruption Policy.
205-3	Confirmed incidents of corruption and actions taken	345	Assured		
<b>Respect for human rights (including those of indigenous minorities)</b>					
401-3	Parental leave	429	Assured		The indicator is partially disclosed due to the lack of the accounting system; information is provided about employees on maternity leave and/or childcare leave and on those who returned to work after the leave ended. The Company will consider developing an appropriate accounting system within the next three years.

<sup>1</sup> Corruption-related risks were assessed for the aspects of anti-corruption activities significant for the Group.

Disclosure number	Disclosure	Page/link	Assured by the auditor	Omission	Comments
402-1	Minimum notice periods regarding operational changes	100	Assured		
405-1	Diversity of governance bodies and employees	80, 406	Assured		
405-2	Ratio of basic salary and remuneration of women to men	—	Assured		The indicator is not disclosed due to the lack of the accounting system. The Company will consider developing an appropriate accounting system within three years. This Report provides information on the correlation of wages received by male and female employees by category.
406-1	Incidents of discrimination and corrective actions taken	—	Assured		No discrimination incidents have been recorded.
407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	—	Assured	Partially disclosed (only for mineral suppliers).	There are no such operations and suppliers <sup>1</sup> . The 2023 due diligence of suppliers covered observance of the right to the freedom of association and collective bargaining as part of checking compliance with the <a href="#">Company’s Supplier Code of Conduct</a> .
408-1	Operations and suppliers at significant risk for incidents of child labour	—	Assured	Partially disclosed (only for mineral suppliers).	There are no such operations and suppliers <sup>1</sup> . The 2023 due diligence of suppliers covered incidents of child labour as part of checking compliance with the <a href="#">Company’s Supplier Code of Conduct</a> .
409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labour	—	Assured	Partially disclosed (only for mineral suppliers).	There are no such operations and suppliers <sup>1</sup> . The 2023 due diligence of suppliers covered incidents of child labour as part of checking compliance with the <a href="#">Company’s Supplier Code of Conduct</a> .
411-1	Incidents of violations involving rights of indigenous peoples	171	Assured		
413-2	Operations with significant actual and potential negative impacts on local communities	220	Assured	—	The main operation (unit) that has a significant negative impact on local communities is Polar Division, whose assets are located in Norilsk. The key source of negative impact is sulphur dioxide emissions into the atmosphere.

<sup>1</sup> In the reporting period, the Company conducted due diligence of mineral suppliers, including internal suppliers that are part of Nornickel Group such as Polar Division, Medvezhy Ruchey, Kola MMC, Murmansk and Polar Transport Divisions, Norilsk Nickel Harjavalta, Poligon-Tekhnogen, and Bystrinsky GOK.

# GRI QUANTITATIVE INDICATORS DISCLOSURE

## Direct economic value generated and distributed<sup>1</sup>, RUB bn

### GRI 201-1

Indicator	2019	2020	2021	2022	2023
Direct economic value generated	884.7	1,123.2	1,324.1	1,183.6	1,235.2
Economic value distributed, including:	909.4	811.6	1,241.4	939.8	1,018.6
• operating expenses <sup>2</sup>	239.3	295.2	423.0	292.2	409.7
• community investments and charity <sup>3</sup>	4.2	9.7	33.0	31.7	25.1
• payroll and other employee remuneration and benefits, including payroll taxes	137.4	147.6	164.7	224.5	234.9
• payments to providers of capital (interest, dividends <sup>4</sup> )	383.7	213.8	412.2	202.8	171.6
• gross tax payments	144.8	145.2	208.4	188.6	177.3
Economic value retained	-24.7	311.7	82.8	243.9	216.5

## Structure of the Board of Directors and the Management Board

### GRI 405-1

Indicator	Board of Directors		Management Board	
	Men	Women	Men	Women
Under 30	0 (0%)	0 (0%)	0 (0%)	0 (0%)
30–50	3 (23%)	3 (23%)	5 (46%)	1 (9%)
Over 50	6 (46%)	1 (8%)	2 (18%)	3 (27%)

<sup>1</sup> In 2023, the Company changed the methodology for assessing this indicator. Comparable data for 2019–2022 was recalculated accordingly.

<sup>2</sup> Since 2020, this line has included environmental and decommissioning provisions.

<sup>3</sup> Excluding CAPEX.

<sup>4</sup> Taking into account dividends accrued.

## Total water withdrawal, mcm

### GRI 303-3, SASB EM-MM-140a.1

Indicator		Total water withdrawal from external sources <sup>1</sup>	Including			
			from surface water bodies	from underground sources	natural water inflow	effluents from third parties and from municipal water supplies and other water utilities (excluding NTEC)
Group's total	2023	315.0	207.3	26.2	51.5	29.9
	2022	353.1	233.2	24.4	61.9	33.6
	2021	351.2	224.9	29.4	57.4	39.5
	2020	374.9	259.8	30.9	46.7	37.5
	2019	319.3	227.3	26.3	36.5	29.2
Including Polar Division	2023	26.0	0.0	0.0	20.9	5.1
	2022	26.2	0.0	0.0	24.2	1.9
	2021	29.8	0.0	0.0	24.36	5.5
	2020	25.6	0.0	0.0	20.1	5.5
	2019	26.5	0.0	0.0	12.85	13.7
NTEC and Norilskenergo	2023	220.4	189.9	25.7	0.0	4.8
	2022	261.1	217.2	23.9	2.7	17.3
	2021	257.9	209.7	28.8	2.04	17.4
	2020	286.0	234.62	30.63	2.7	18.0
	2019	240.2	212.8	26.1	0.0	1.3
Kola MMC	2023	38.0	13.6	0.0	12.9	11.5
	2022	39.1	12.3	0.0	13.3	13.6
	2021	32.5	11.1	0.0	13.1	8.3
	2020	38.2	21.3	0.0	8.7	8.3
	2019	27.9	13.2	0.0	6.1	8.6

<sup>1</sup> Excluding water reused from NTEC networks.

**Water withdrawal by water source and type in 2022–2023,**  
mcm

GRI 303-3, SASB EM-MM-140a.1

Indicator	2022	2023
<b>TOTAL WATER WITHDRAWAL</b>	<b>353.1</b>	<b>315.0</b>
Water from surface water bodies, including:	233.2	207.3
• fresh water	233.2	207.3
• other water	0.0	0.0
Water from underground sources, including:	24.4	26.2
• fresh water	24.4	26.2
• other water	0.0	0.0
Effluents from third parties and from municipal water supplies and other water utilities (excluding NTEC), including:	33.6	29.9
• fresh water	9.2	0.0
• other water	24.4	29.9
Natural water inflow, including:	61.9	51.5
• fresh water	0.0	0.0
• other water	61.9	51.5
Water from NTEC, including:	85.6	87.4
• fresh water	85.6	87.4
• other water	0.0	0.0
Sea or ocean water, including:	0.0	0.0
• fresh water	0.0	0.0
• other water	0.0	0.0

**Water bodies used for water withdrawal and waste water discharge<sup>1</sup>**

GRI 303-1/ SASB EM-MM-140a.1

Branches and business units	Water bodies used for water withdrawal and the scale of impact associated with the Company	Water bodies used for wastewater discharge and the scale of impact associated with the Company
Polar Division	Water is withdrawn from the Yenisey River, the water bodies of the Norilsk-Pyasinno water system and the Kara Sea.	Wastewater is discharged into water bodies of the Yenisey River and Norilsk-Pyasinno water system. The Company's operations have no material impact on the water bodies.
Polar Transport Division		
Krasnoyarsk Transport Division		
Medvezhy Ruchey		
Norilskgazprom		
Norilsktransgaz		
Norilsknickelremont		
Polar Construction Company		
Norilsk Production Support Complex		
NN Technical Services		
Taimyr Fuel Company		
Yenisey River Shipping Company		
Norilsk Airport		
Norilsk-Taimyr Energy Company		
Pechengastroy		
Norilsk Trading and Production Association	Water is withdrawn from the water bodies of the Barents Sea. The Company's operations have no material impact on the water bodies.	Wastewater is discharged into the water bodies of the Barents Sea. The Company's operations have no material impact on the water bodies.
Renons		
Lesosibirsk Port		
Murmansk Transport Division	Water is withdrawn from the water bodies of the Amur River. The Company's operations have no material impact on the water bodies.	Wastewater is discharged into the water bodies of the Amur River. The Company's operations have no material impact on the water bodies.
Kola MMC		
Taimyr Fuel Company		
GRK Bystrinskoye	Water is withdrawn from the Black Sea. The Company's operations have no material impact on the water bodies.	Wastewater is discharged into the Black Sea. The Company's operations have no material impact on the water bodies.
Vostokgeologiya		
Zapolyarye Health Resort		

<sup>1</sup> The Company does not make a material impact on the water bodies specified. Water is withdrawn within the established limits. Waster water is discharged in accordance with the relevant permits and predominantly within the established limits.

**Water use, including water recycling,**  
mcm

Indicator		Total water used	utility water	Including production	Including		Water recycled and reused as percentage of total water used (%)
					water reused	water recycled	
<b>GROUP'S TOTAL</b>	<b>2023</b>	<b>1,291.9</b>	<b>22.9</b>	<b>1,268.9</b>	<b>52.1</b>	<b>1,015.8</b>	<b>82.7</b>
	<b>2022</b>	<b>1,351.4</b>	<b>21.6</b>	<b>1,329.7</b>	<b>27.1</b>	<b>1,077.8</b>	<b>81.8</b>
	<b>2021</b>	<b>1,280.8</b>	<b>25.2</b>	<b>1,255.6</b>	<b>31.6</b>	<b>1,052.0</b>	<b>84.6</b>
	<b>2020</b>	<b>1,458.1</b>	<b>23.0</b>	<b>1,435.1</b>	<b>31.2</b>	<b>1,229.0</b>	<b>86.4</b>
	<b>2019</b>	<b>1,343.5</b>	<b>18.8</b>	<b>1,324.7</b>	<b>30.7</b>	<b>1,141.3</b>	<b>87.2</b>
Including Polar Division and Norilskenergo	2023	438.9	5.1	433.8	28.6	349.7	86.2
	2022	435.6	5.2	430.4	23.4	350.3	85.8
	2021	460.8	14.9	445.9	27.7	384.2	89.3
	2020	471.2	13.6	457.6	27.7	384.2	89.4
	2019	461.2	10.5	450.7	29.4	388.7	90.7
Norilsk-Taimyr Energy Company	2023	624.5	10.8	613.8	0.9	522.1	83.7
	2022	715.6	9.9	705.7	0.9	584.2	81.8
	2021	626.9	0.9	626.0	0.9	514.2	82.2
	2020	764.5	0.9	763.6	0.1	641.1	84
	2019	656.5	0.9	655.6	0.1	551.1	84.1
Kola MMC	2023	113.3	1.7	111.5	0.2	90.3	79.9
	2022	109.8	1.8	108.0	0.1	88.7	80.9
	2021	100.3	1.8	98.5	0.1	98.4	98.2
	2020	141.4	1.6	139.8	0.2	139.7	98.9
	2019	156.5	1.7	154.9	0.1	150	95.9
Other companies	2023	115.2	5.3	109.9	22.4	53.7	66.1

**Total effluents<sup>1</sup> and pollutants discharged<sup>2</sup>**

GRI 303-4

Indicator		Total effluents (mcm)	Including				Pollutants in effluents (kt)
			insufficiently treated	contaminated untreated	treated to standard quality at treatment facilities	standard clean (without treatment)	
<b>GROUP'S TOTAL</b>	<b>2023</b>	<b>147.1</b>	<b>32.2</b>	<b>40.8</b>	<b>6.7</b>	<b>67.5</b>	<b>157.3</b>
	<b>2022</b>	<b>168.0</b>	<b>34.1</b>	<b>40.7</b>	<b>3.7</b>	<b>89.5</b>	<b>208.6</b>
	<b>2021</b>	<b>193.8</b>	<b>33.8</b>	<b>60.3</b>	<b>4.9</b>	<b>94.8</b>	<b>237.0</b>
	<b>2020</b>	<b>202.4</b>	<b>33.1</b>	<b>54.8</b>	<b>4.3</b>	<b>110.2</b>	<b>244.3</b>
	<b>2019</b>	<b>142.4</b>	<b>26.2</b>	<b>36</b>	<b>4.6</b>	<b>75.6</b>	<b>210.6</b>
Including Polar Division and Norilskenergo	2023	23.4	0.9	22.1	0.4	—	26.3
	2022	23.5	1.0	22.1	0.4	0.0	26.6
	2021	37.0	1.2	35.4	0.4	0.0	60.0
	2020	33.7	1.7	31.6	0.4	0.0	66.7
	2019	23.7	1.4	21	0.8	0.5	58.3
Norilsk-Taimyr Energy Company	2023	74.3	—	6.5	0.6	67.2	2.5
	2022	95.8	0.0	6.7	0.0	89.1	3.4
	2021	88.2	0.0	6.9	0.0	81.3	3.0
	2020	104.9	0.0	8.8	0.1	96.1	3.0
	2019	74.6	0.0	2.1	0.004	72.5	1.1
Kola MMC	2023	26.6	26.3	0.3	—	—	91.9
	2022	26.7	26.4	0.3	0.0	0.0	129.1
	2021	27.5	25.9	0.9	0.7	0.0	122.0
	2020	25.8	25.1	0.7	0.0	0.0	126.7
	2019	22.1	21.8	0.3	0.0	0.0	124.4
Other companies	2023	22.9	5.0	11.9	5.7	0.3	36.6

<sup>1</sup> Effluents are measured with gauges.

<sup>2</sup> The main pollutants of the Group include substances dominating in the volume of wastewater: suspended solids, oil products, metals, and nitrogen compounds.

**NO<sub>x</sub>, SO<sub>x</sub> and other significant air emissions, including their type and weight<sup>1</sup>, kt**

GRI 305-7

Indicator		Group's total	Polar Division	Norilsk-Taimyr Energy Company	Kola MMC	Other companies	
<b>TOTAL AMOUNT</b>		<b>2023</b>	<b>1,707.7</b>	<b>1,671.5</b>	<b>5.8</b>	<b>16.3</b>	<b>14.1</b>
		<b>2022</b>	<b>1,819.4</b>	<b>1,778.9</b>	<b>9.8</b>	<b>16.4</b>	<b>14.3</b>
		<b>2021</b>	<b>1,646.9</b>	<b>1,601.4</b>	<b>12.6</b>	<b>19.6</b>	<b>13.3</b>
		<b>2020</b>	<b>1,968.1</b>	<b>1,857.5</b>	<b>10.1</b>	<b>83.4</b>	<b>17.1</b>
		<b>2019</b>	<b>1,952.7</b>	<b>1,819.2</b>	<b>10.6</b>	<b>110.8</b>	<b>12.1</b>
Including	NO <sub>x</sub>	2023	6.0	0.9	2.8	1.5	0.8
		2022	9.7	1.1	6.0	1.4	1.2
		2021	11.4	0.7	8.3	1.4	1.0
		2020	10.0	0.6	6.9	1.6	0.9
		2019	10.3	0.5	7.2	1.8	0.8
	Sulphur dioxide	2023	1,671.4	1,658.3	0.0	12.8	0.3
		2022	1,778.4	1,764.9	0.1	13.1	0.3
		2021	1,601.4	1,585.2	0.1	15.7	0.4
		2020	1,910.8	1,836.9	0.0	73.2	0.7
		2019	1,898.1	1,798.6	0.0	99.4	0.1
	Solids	2023	10.5	5.4	0.0	1.0	4.2
		2022	10.7	5.8	0.0	0.8	4.1
		2021	8.9	3.9	0.0	1.2	3.8
		2020	14.6	4.1	0.0	6.1	4.4
		2019	13.3	4.2	0.0	7.0	2.1
Other pollutants	2023	19.7	6.8	3.0	1.0	8.8	
	2022	20.6	7.1	3.7	1.1	8.7	
	2021	25.2	11.6	4.2	1.3	8.1	
	2020	32.7	15.9	3.2	2.5	11.1	
	2019	31.0	15.9	3.4	2.6	9.1	

<sup>1</sup> Air pollutant emissions are determined on the basis of the Environmental Monitoring and Industrial Control data: emissions are calculated as per the applicable methodologies using data on feedstock and equipment running time, through sampling and analysing flue gases, direct measurements with gas analysers, etc.

**Total weight of waste by type and disposal method, mt**

GRI 306-3, 306-4, 306-5, SASB EM-MM-150a.8

Indicator		Total (mt)		Including			
				Polar Division	Kola MMC	GRK Bystrinskoye <sup>1</sup>	Medvezhy Ruchey
Waste-related activity	Generation	2023	176.9	13.8	7.6	79.9	53.0
		2022	166.3	13.9	7.3	85.1	59.1
		2021	156.4	13.7	7.5	85.5	49.0
		2020	145.2	14.8	8.1	87.5	34.8
		2019	36.4	15.6	7.9	0.0	12.4
	Waste input from third parties	2023	2.2	0.3	0.0	0.0	1.9
		2022	2.0	0.3	0.0	0.0	1.6
		2021	1.6	0.3	0.0	0.0	1.2
		2020	1.0	0.1	0.0	0.0	0.5
		2019	0.6	0.6	0.0	0.0	0.06
In-house waste recovery	2023	29.9	7.3	4.1	4.7	13.9	
	2022	30.0	8.1	4.0	4.4	13.4	
	2021	23.7	6.1	4.0	3.9	9.7	
	2020	34.3	10.5	6.1	12.1	5.2	
	2019	22.8	14.3	4.2	0.0	4.2	
In-house waste treatment	2023	0.0002	0.00001	0.0001	0.0	0.0	
	2022	0.0004	0.0	0.0003	0.0	0.0	
	2021	0.0001	0.0	0.0	0.0	0.0	
	2020	0.004	0.0	0.002	0.0	0.0	
	2019	0.003	0.0	0.001	0.0	0.0	

<sup>1</sup> In 2020, Bystrinsky GOK was included in the reporting perimeter after it reached its design capacity in the reporting period. Its significant waste figures are driven by the first stage of the deposit development, which involves large volumes of waste generation, mainly overburden, to support further operations.

Indicator		Total (mt)	Including			
			Polar Division	Kola MMC	GRK Bystrinskoye <sup>1</sup>	Medvezhy Ruchey
Waste transfer to third parties (for recovery or treatment)	2023	4.0	2.2	0.0	0.002	1.8
	2022	3.1	1.8	0.02	0.002	1.3
	2021	5.76	5.39	0.04	0.003	0.2
	2020	3.48	3.23	0.04	0.003	0.2
	2019	0.50	0.24	0.014	0.0	0.2
Waste transfer to third parties (for disposal)	2023 <sup>2</sup>	0.4	0.1	0.0	0.0	0.01
	2022	0.7	0.2	0.0	0.0	0.01
	2021	0.6	0.2	0.0	0.0	0.01
	2020	0.2	0.1	0.0	0.001	0.01
	2019	0.6	0.1	0.0	0.0	0.01
Waste landfilling at in-house waste disposal sites	2023	0.8	0.8	0.01	0.005	0.00
	2022 <sup>3</sup>	0.74	0.72	0.02	0.01	0.0
	2021	127.5	6.0	3.4	77.3	40.4
	2020	111.2	2.3	2.7	76.33	29.9
	2019	6.0	3.2	2.8	0.0	8.0

Waste management in 2023 by hazard class and waste type, kt

GRI 306-3, 306-4, 306-5, SASB EM-MM-150a.4, EM-MM-150a.5, EM-MM-150a.6, EM-MM-150a.7, EM-MM-150a.8

Indicator	Hazard class I	Hazard class II	Hazard class III	Hazard class IV	Hazard class V	Total	Including hazard classes I-IV waste (% of total)
Generation	0.02	0.05	8.02	1,595.45	175,290.85	176,894.4	0.9
Waste generation after processing	-	-	2.17	1.17	0.00	3.34	100
Waste input from third parties	-	-	1.37	88.24	2,118.67	2,208.28	4.1
In-house waste recovery, including	-	-	2.15	0.31	29,897.10	29,899.56	0.0
• direct recycling	-	-	0.01	0.02	18,529.78	18,529.81	0.0
• other recovery activities	-	0	2.13	0.29	11,367.33	11,369.75	0.0
In-house waste treatment	-	0.01	0.06	0.06	0.05	0.18	72.4
Waste transfer to third parties (for processing)	-	-	0.09	0.10	1.34	1.53	12.2
Waste transfer to third parties (for recovery)	0.00	0.03	4.62	4.89	3,987.19	3,996.74	0.2
Waste transfer to third parties (for treatment)	0.02	0.00	1.77	1.41	1.53	4.74	67.3
Waste transfer to third parties (for disposal)	0	0.00001	0	174.00	247.72	421.72	41.3
Transfer to local municipal solid waste operator	-	-	-	17.0	1.3	18.3	92.9
Waste landfilling at in-house waste disposal sites	0	0	0.00271	571.35	211.05	782.41	73.0
Waste handed over for economic utilisation (recovered at intragroup facilities or by contractors)	0.00	0.03	6.77	5.19	33,884.30	33,896.29	0.0
Waste handled (treated or disposed at intragroup facilities or by contractors) <sup>1</sup>	0.02	0.02	1.83	746.83	410.08	1,158.77	64.6

<sup>1</sup> In 2020, Bystrinsky GOK was included in the reporting perimeter after it reached its design capacity in the reporting period. Its significant waste figures are driven by the first stage of the deposit development, which involves large volumes of waste generation, mainly overburden, to support further operations.

<sup>2</sup> This indicator includes landfilling only.

<sup>3</sup> In 2022, the calculation methodology was changed in line with GRI 306-5, with this indicator including landfilling only since 2022.

<sup>1</sup> The indicator does not take into account the transfer of waste to third parties for storage purposes.

The Company's gypsum storage facilities and tailing dumps

SASB EM-MM-540a.1

Facility name	Location	Ownership status	Operational status	Construction method	Permitted maximum storage (mcm)	Amount of tailings stored as of 31 December 2023 (mcm)	Consequences classification	Date of most recent independent technical review	Material findings	Mitigation measures	Site-specific EPRP
Tailing dump of Talnakh Concentrator	Norilsk	Owned by MMC Norilsk Nickel	Active	Upstream	198.0	27.2	High	September 2023	Level of safety: normal	Not applicable	Yes
Tailing dump No. 1 of Norilsk Concentrator	Norilsk	Owned by Medvezhy Ruchey (part of the Group)	Used as an intermediate storage facility	Upstream	144.0	144.0	High	September 2022	Level of safety: unsatisfactory	Not applicable	Yes
Lebyazhye tailing dump	Norilsk	Owned by Medvezhy Ruchey (part of the Group)	Active	Upstream	343.1	233.6	High	September 2022	Level of safety: unsatisfactory	Not applicable	Yes
Tailing dump of Nadezhda Metallurgical Plant	Norilsk urban district	Owned by MMC Norilsk Nickel	Active	Downstream	40.0	37.5	High	March 2021	Level of safety: normal	Not applicable	Yes
Gypsum storage No. 1	Norilsk urban district	Owned by MMC Norilsk Nickel	Under construction	Upstream	90.0	Not applicable	Low	Not applicable	Not applicable	Not applicable	Not applicable
Tailing dump of Zapolyarny Concentrator tailing section, Kola MMC	Murmansk Region, 1 km to the south of Zapolyarny, Pechengsky District	Owned by Kola MMC (part of the Group)	Active	Upstream	263.9	251.0	High	October 2022	Level of safety: normal	Not applicable	Yes
Tailing dump of Bystrinsky GOK	Gazimuro-Zavodsky District, 15 km away from Gazimursky Zavod	Owned by GRK Bystrinskoye (part of the Group)	Active	Upstream	186.1	30.8	High	April 2022	Level of safety: lower	Not applicable	Yes

List of protected species identified in the Company's impact area

GRI 304-4

List of protected species identified in Norilsk and Energy Divisions' areas of operation

Species	Red List of the International Union for Conservation of Nature (IUCN) (status)	Red Data Book of the Russian Federation (status)	Red Data Book of the Krasnoyarsk Territory (status)	Limited distribution area
<b>Animals</b>				
Whooper swan (Cygnus cygnus)	LC	No	2, a sparse species with groupings of varying degrees of vulnerability and knowledge	No
White-tailed eagle (Haliaeetus albicilla)	LC	5, Least Concern	5, a rare widespread species	No

Species	Red List of the International Union for Conservation of Nature (IUCN) (status)	Red Data Book of the Russian Federation (status)	Red Data Book of the Krasnoyarsk Territory (status)	Limited distribution area
Gyrfalcon (Falco rusticolus)	LC	2, endangered	2, a rare, declining, vulnerable species	No
Grey-tailed tattler (Heteroscelus brevipes)	NT	No	4, an understudied species with an unknown status in the territory	No
Little gull (Larus minutus)	LC	No	3, a rare sporadically found bird	No
Bean goose (Anser fabalis fabalis)	LC	2, endangered	2, a rare, declining subspecies	No
Bean goose (Anser fabalis middendorffii)	LC	2, vulnerable	2, a vulnerable declining subspecies	No

List of rare and protected species identified in the area of Kola Division facilities

Species	Red List of the International Union for Conservation of Nature (IUCN) (status)	Red Data Book of the Russian Federation (status)	Red Data Book of the Murmansk Region (status)
<b>Plants</b>			
Heath spotted-orchid ( <i>Dactylorhiza maculata</i> )	LC	No	No
Fragrant orchid ( <i>Gymnadenia conopsea</i> )	LC	No	No
<b>Reptiles</b>			
Common adder ( <i>Vipera berus</i> )	LC	No	3, rare
<b>Birds</b>			
Golden eagle ( <i>Aquila chrysaetos</i> )	LC	3, vulnerable	3, rare
Great grey owl ( <i>Strix nebulosa</i> )	LC	No	3, rare
Bean goose ( <i>Anser fabalis fabalis</i> )	LC	2, declining, endangered	No
Lesser black-backed gull ( <i>Larus fuscus</i> )	LC	2, declining in number and/or distribution	No
Whooper swan ( <i>Cygnus cygnus</i> )	LC	No	3, a sparse species with groupings of varying degrees of vulnerability and knowledge
Smew ( <i>Mergellus albellus</i> )	LC	No	3, rare
Great grey shrike ( <i>Lanius excubitor</i> )	LC	No	3, rare
White-tailed eagle ( <i>Haliaeetus albicilla</i> )	LC	5, rehabilitated	3, rare
Common kestrel ( <i>Falco tinnunculus</i> )	LC	No	3, rare
Rustic bunting ( <i>Emberiza rustica</i> )	VU	2, declining	No
Common crane ( <i>Grus grus</i> )	LC	No	3, rare
Osprey ( <i>Pandion haliaetus</i> )	LC	3, rare	3, rare
<b>Mammals</b>			
Roe deer ( <i>Capreolus capreolus</i> )	LC	No	4, uncertain status
Eurasian lynx ( <i>Lynx lynx</i> )	LC	No	4, uncertain status

List of rare and protected species identified in the area of Trans-Baikal Division facilities

Species	Red List of the International Union for Conservation of Nature (IUCN) (status)	Red Data Book of the Russian Federation (status)	Red Data Book of the Trans-Baikal Territory (status)
<b>Plants</b>			
Red hardy orchid ( <i>Cypripedium × ventricosum</i> Sw.)	LC	3, rare	No
Lady's-slipper orchid ( <i>Cypripedium calceolus</i> L.)	LC	3, rare	3, rare
Spotted lady's slipper ( <i>Cypripedium guttatum</i> Sw.)	LC	No	2, declining
Large-flowered cypripedium ( <i>Cypripedium macranthos</i> Sw.)	LC	3, rare	3, rare
Phlojodicarpus sibiricus (Fisch. Ex Sprengel) Koso-Pol.	No	No	2, declining
Neottianthe cucullata (L.) Schlechter	EN	No	2, declining
Iris sanguinea Donn	No	No	2, declining
Snakeroot ( <i>Cimicifuga dahurica</i> (Turcz. ex Fisch. & C.A. Mey.) Maxim.)	No	No	3, rare
Atragene ochotensis Pallas	No	No	4, uncertain status
Dwarf daylily ( <i>Hemerocallis minor</i> Miller)	No	No	2, declining
Lily of the valley ( <i>Convallaria keiskei</i> Miq)	No	No	3, rare
Lilium pumilum DC.	No	No	2, declining
Siberian lily ( <i>Lilium pensylvanicum</i> DC.)	No	No	2, declining
Chinese peony ( <i>Paeonia lactiflora</i> Pallas)	No	3, rare	2, declining
Siberian rowan ( <i>Sorbus sibirica</i> Hedl)	LC	No	3, rare
<b>Invertebrate animals</b>			
Daurian pear oyster ( <i>Dahurinaia dahurica</i> )	No	2, declining	2, declining
<b>Amphibians</b>			
Japanese tree frog ( <i>Hyla japonica</i> )	LC	No	3, rare
<b>Birds</b>			
Falcated duck ( <i>Anas falcata</i> )	NT	2, declining, endangered	1, endangered
Greater spotted eagle ( <i>Aquila clanga</i> )	VU	2, declining, endangered	1, endangered
Hen harrier ( <i>Circus syaneus</i> )	LC	No	2, declining
Common crane ( <i>Grus grus</i> )	LC	No	3, rare

Species	Red List of the International Union for Conservation of Nature (IUCN) (status)	Red Data Book of the Russian Federation (status)	Red Data Book of the Trans-Baikal Territory (status)
Demoiselle crane ( <i>Anthropoides virgo</i> )	LC	2, declining, vulnerable	1, endangered
Eurasian curlew ( <i>Numenius arquata</i> )	NT	2, declining, vulnerable	3, rare
Far Eastern curlew ( <i>Numenius madagascariensis</i> )	EN	2, declining, endangered	1, endangered
Black-tailed godwit ( <i>Limosa limosa</i> )	NT	No	3, rare
Yellow-breasted bunting ( <i>Emberiza aureola</i> )	CR	2, declining	2, declining
Chinese bush warbler ( <i>Bradypterus tacsanowskii</i> )	LC	No	4, uncertain status
<b>Mammals</b>			
Ognev's long-eared bat ( <i>Plecotus ognevi</i> )	LC	No	3, rare

### Methods used by Nornickel to assess the state of ecosystems

#### Method for integral assessment of ecosystem health

To quantify the current state of biodiversity in various impact areas around the Company's facilities, Nornickel calculates the biodiversity indicator

(as a percentage) for a specific impact area divided by the same indicator determined for the background area.

$$IIEH = \frac{\sum_{i=1}^n \left( \frac{P_i}{P_i(back)} \right)}{n}$$

*P<sub>i</sub>* – average values of indicators determined for a specific site/station;  
*P<sub>i</sub>(back)* – values of the same indicators determined for the background area;  
*n* – number of indicators.

For each region, there is a set of key parameters for key groups, including species richness, plant occurrence, dominance index, and so on. By calculating the average percentages obtained for various indicators in a specified area, we can estimate the area's total biodiversity, expressed as the Integral Indicator of Ecosystem Health (IIEH).

For assessment of biodiversity in the impact areas of the Group's divisions, Nornickel uses a division-level IIEH. IIEH is calculated based

on biodiversity indicators for all impact areas taking into account their size separately for each division.

#### IIEH values

Assets / groups of assets	Terrestrial ecosystems	Water ecosystems
Norilsk and Energy divisions (Norilsk Industrial District)	0.87	0.84
Kola Division	0.92	0.92
Trans-Baikal Division	0.96	1.07

At the first stage, when the approach was tested on data collected for a two-year period, it proved to be relatively effective. The method requires further improvements to confirm its effectiveness for a three-year period data and to include additional indicator groups in IIEH calculations, such as abundance and dominance structure.

#### Use of phytochemical indices as indicators of depression in plants<sup>1</sup>

Exploring changes in secondary metabolites<sup>2</sup> as more precise indicators of environmental pollution is one of the promising areas for annual monitoring of the state of standalone plants and the ecosystem in general.

In 2023, a phytochemical analysis of the composition of leaves of the mountain birch (*Betula czerepanovii*) was carried out at Kola Division. A set of indicators such as phenolic compounds, pigments and antioxidant activity (which was actually used in this case) can serve as a bioindicator of the intensity of man-induced contamination.

#### Use of genetic methods of analysis (DNA metabarcoding)

Data collected during a two-year period prove the high effectiveness of DNA metabarcoding, which was used for determining the species richness and specificity of structure in communities of soil microarthropods<sup>3</sup>.

For aquatic ecosystems, fish biodiversity was investigated by identifying gene remnants of species in the environment from extracellular DNA present in water. The analysis showed that Vetrennoye Lake contains valuable fish species (whitefish and smelt)<sup>4</sup>. This is an effective alternative to the classic method of fish catching.

DNA analysis helps not only discover new species and increase the precision of research results but also gather new data on genetic diversity for scientific databases and share the results of observations with the global academic community by publications in international journals that rely on research materials. Incorporation of genetic methods into the system of corporate indicators helps promote the use of genetic data on the environment.

If the IIEH value is below 1, this means there is a loss in biodiversity as compared to the background area, while IIEH above 1 means a gain in biodiversity.

Indicator	Impact			Background area
	Significant	Medium	Insignificant	
Biodiversity IIEH	<0.80	0.80 – 0.89	0.90 – 0.99	≥1.0

<sup>1</sup> Reduced plant resilience and productivity.

<sup>2</sup> Products of metabolism in cells, tissues and organs of living organisms.

<sup>3</sup> Small arthropods that usually live in the soil.

<sup>4</sup> For more details, please see [Company's website](#).

# Social performance

## Benefits for employees of Polar Division

GRI 401-2

Benefits	Full-time work		Temporary work <sup>1</sup>		Seasonal work		Part-time work
	full-time work	part-time work	full-time work	part-time work	full-time work	part-time work	
Reimbursement of vacation travel expenses (incl. return fare)	+ <sup>2</sup>	+ <sup>2</sup>	+ <sup>2</sup>	+ <sup>2</sup>	+ <sup>3</sup>	+ <sup>3</sup>	- <sup>2</sup>
All kinds of financial aid	+	+	+	+	+	+	- <sup>4</sup>
Health resort treatment and vacations	+ <sup>5</sup>	+ <sup>5</sup>	+ <sup>5</sup>	+ <sup>5</sup>	-	-	- <sup>5</sup>
Vouchers for children's wellness recreation tours	+	+	+	+	-	-	- <sup>4</sup>
Pension plans	+	+	+	+	-	-	- <sup>4</sup>
Termination benefits (apart from those prescribed by the applicable laws)	+	+	+	+	+ <sup>6</sup>	+ <sup>6</sup>	-

## Benefits for employees of Kola MMC

GRI 401-2

Benefits	Full-time work		Temporary work <sup>7</sup>		Seasonal work <sup>8</sup>		Part-time work
	part-time work	full-time work	part-time work	full-time work	full-time work	part-time work	
Reimbursement of vacation travel expenses (incl. return fare)	+ <sup>9</sup>	+ <sup>9</sup>	+ <sup>9</sup>	-	-	-	- <sup>9</sup>
All kinds of financial aid	+	+	+	-	-	-	- <sup>10</sup>

<sup>1</sup> Work under a fixed-term employment contract.

<sup>2</sup> The benefit is available to employees who have the Company as their primary employer with workplaces in the Far North, including employees engaged in shift-camp work but permanently residing in the Far North.

<sup>3</sup> According to the collective bargaining agreement and local regulations, such categories of employees are not excluded from benefits; however, in practice, travel expenses are not reimbursed since no vacation is granted to such employees.

<sup>4</sup> The benefit is available to employees who have the Company as their main employer.

<sup>5</sup> The benefit is available to employees who have the Company as their main employer with workplaces in the Far North.

<sup>6</sup> According to the collective bargaining agreement and local regulations, such categories of employees are not excluded from the reimbursement of expenses associated with relocation, it is practically possible. No severance pay is provided by mutual agreement.

<sup>7</sup> Work under a fixed-term employment contract.

<sup>8</sup> At Kola MMC, there is no seasonal work; employees do not work seasonally.

<sup>9</sup> The benefit is available to employees who have Kola MMC as their primary employer with workplaces in the Far North, including employees engaged in shift-camp work and permanently residing in the Far North.

<sup>10</sup> The benefit is available to employees who have Kola MMC as their main employer.

Benefits	Full-time work		Temporary work		Seasonal work		Part-time work
	part-time work	full-time work	part-time work	full-time work	full-time work	part-time work	
Health resort treatment and vacations	+	+	+	-	-	-	- <sup>2</sup>
Vouchers for children's wellness recreation tours	+	+	+	-	-	-	- <sup>1</sup>
Pension plans	+	+	+	-	-	-	- <sup>1</sup>
Termination benefits (apart from those prescribed by the applicable laws)	+	+	+	-	-	-	-

## Benefits for employees of GRK Bystrinskoye

GRI 401-2

Benefits	Full-time work		Temporary work		Seasonal work <sup>3</sup>		Part-time work
	full-time work	part-time work	full-time work	part-time work	full-time work	part-time work	
Reimbursement of vacation travel expenses (incl. return fare)	+	+	+	+	-	-	+
All kinds of financial aid	+	+	+	+	-	-	- <sup>4</sup>
Health resort treatment and vacations	+	+	+	-	-	-	- <sup>4</sup>
Vouchers for children's wellness recreation tours	+	+	+	-	-	-	- <sup>4</sup>
Pension plans <sup>5</sup>	-	-	-	-	-	-	-
Termination benefits (apart from those prescribed by the applicable laws)	+	+	+	+	-	-	-

<sup>1</sup> The benefit is available to employees who have Kola MMC as their main employer.

<sup>2</sup> The benefit is available to employees who have Kola MMC as their main employer with workplaces in the Far North.

<sup>3</sup> At GRK Bystrinskoye, no seasonal work is carried out; employees do not work seasonally.

<sup>4</sup> The benefit is available to employees who have GRK Bystrinskoye as their main employer.

<sup>5</sup> GRK Bystrinskoye does not offer pension plans.

Benefits for employees of the Head Office

GRI 401-2

Benefits	Full-time work		Temporary work		Seasonal work <sup>1</sup>		Part-time work
	full-time work	part-time work	full-time work	part-time work	full-time work	part-time work	
Reimbursement of vacation travel expenses (incl. return fare)	+ <sup>2</sup>	+ <sup>2</sup>	+ <sup>2</sup>	+ <sup>2</sup>	-	-	- <sup>2</sup>
All kinds of financial aid	+	+	+	+	-	-	- <sup>3</sup>
Health resort treatment and vacations <sup>4</sup>	-	-	-	-	-	-	-
Vouchers for children's wellness recreation tours	+	+	+	+	-	-	- <sup>3</sup>
Pension plans	+	+	+	+	-	-	- <sup>3</sup>
Termination benefits (apart from those prescribed by the applicable laws)	+	+	+	+	-	-	-

Headcount by type of employment, gender and region, employees

GRI 2-7, 2-8

Indicator	2021			2022			2023		
	Total	Men	Women	Total	Men	Women	Total	Men	Women
<b>TOTAL HEADCOUNT IN RUSSIA AS AT THE LATEST REPORTING DATE</b>	<b>77,755</b>	<b>54,663</b>	<b>23,092</b>	<b>83,103</b>	—	—	<b>83,065</b>	—	—
<b>CONTRACTORS WHOSE WORK IS CONTROLLED BY THE GROUP, AS AT THE LATEST REPORTING DATE</b>	<b>1,129</b>	<b>784</b>	<b>345</b>	<b>907</b>	—	—	<b>1,013</b>	—	—
<b>EMPLOYEES AS AT THE LATEST REPORTING DATE, INCLUDING:</b>	<b>76,626</b>	<b>53,879</b>	<b>22,747</b>	<b>82,196</b>	<b>57,930</b>	<b>24,266</b>	<b>82,052</b>	<b>57,708</b>	<b>24,344</b>
• in the Norilsk Industrial District	—	—	—	55,470	—	—	55,282	40,338	14,944
• in the Krasnoyarsk Territory (except for NID)	—	—	—	3,455	—	—	3,370	2,361	1,009
• in the Kola Peninsula (Murmansk Region)	—	—	—	12,404	—	—	12,152	8,789	3,363

<sup>1</sup> At the Head Office, no seasonal work is carried out; employees do not work seasonally.

<sup>2</sup> The benefit is available to employees who have the Company as their main employer with workplaces in the Far North.

<sup>3</sup> The benefit is available to employees who have the Company as their main employer.

<sup>4</sup> The Head Office does not offer any health resort treatment programmes.

Indicator	2021			2022			2023		
	Total	Men	Women	Total	Men	Women	Total	Men	Women
• in Moscow and other regions of Russia	—	—	—	8,006	—	—	8,182	3,653	4,529
• in the Trans-Baikal Territory	—	—	—	2,861	—	—	3,066	2,567	499
<b>EMPLOYEES WORKING UNDER FIXED-TERM CONTRACTS (TEMPORARY AND SEASONAL JOBS) AS AT THE LATEST REPORTING DATE, INCLUDING:</b>	<b>3,944</b>	<b>2,353</b>	<b>1,591</b>	<b>4,497</b>	<b>2,755</b>	<b>1,742</b>	<b>4,836</b>	<b>3,238</b>	<b>1,598</b>
• in the Norilsk Industrial District	2,616	—	—	2,709	—	—	3,247	2,374	873
• in the Krasnoyarsk Territory (except for NID)	136	—	—	116	—	—	84	53	31
• in the Kola Peninsula (Murmansk Region)	194	—	—	180	—	—	202	96	106
• in Moscow and other regions of Russia	898	—	—	1,353	—	—	1,210	646	564
• in the Trans-Baikal Territory	100	—	—	139	—	—	93	69	24
<b>EMPLOYEES WORKING UNDER UNLIMITED CONTRACTS (PERMANENT JOBS) AS AT THE LATEST REPORTING DATE, INCLUDING:</b>	<b>72,682</b>	<b>51,526</b>	<b>21,156</b>	<b>77,699</b>	<b>55,184</b>	<b>22,515</b>	<b>77,216</b>	<b>54,470</b>	<b>22,746</b>
• in the Norilsk Industrial District	48,652	—	—	52,761	—	—	52,035	37,964	14,071
• in the Krasnoyarsk Territory (except for NID)	3,929	—	—	3,339	—	—	3,286	2,308	978
• in the Kola Peninsula (Murmansk Region)	11,719	—	—	12,224	—	—	11,950	8,693	3,257
• in Moscow and other regions of Russia	5,769	—	—	6,653	—	—	6,972	3,007	3,965
• in the Trans-Baikal Territory	2,613	—	—	2,722	—	—	2,973	2,498	475
<b>FULL-TIME EMPLOYEES AS AT THE LATEST REPORTING DATE, INCLUDING:</b>	<b>75,773</b>	<b>53,312</b>	<b>22,461</b>	<b>81,404</b>	<b>57,405</b>	<b>23,999</b>	<b>81,204</b>	<b>57,177</b>	<b>24,027</b>
• in the Norilsk Industrial District	—	—	—	54,932	—	—	54,732	39,942	14,790
• in the Krasnoyarsk Territory (except for NID)	—	—	—	3,422	—	—	3,336	2,348	988
• in the Kola Peninsula (Murmansk Region)	—	—	—	12,359	—	—	12,113	8,769	3,344
• in Moscow and other regions of Russia	—	—	—	7,843	—	—	7,970	3,556	4,414
• in the Trans-Baikal Territory	—	—	—	2,848	—	—	3,053	2,562	491

Indicator	2021			2022			2023		
	Total	Men	Women	Total	Men	Women	Total	Men	Women
<b>PART-TIME EMPLOYEES AS AT THE LATEST REPORTING DATE, INCLUDING:</b>	<b>80</b>	<b>29</b>	<b>51</b>	<b>88</b>	<b>27</b>	<b>61</b>	<b>143</b>	<b>44</b>	<b>99</b>
• in the Norilsk Industrial District	—	—	—	3	—	—	30	15	15
• in the Krasnoyarsk Territory (except for NID)	—	—	—	7	—	—	11	2	9
• in the Kola Peninsula Industrial District (Murmansk Region)	—	—	—	16	—	—	14	7	7
• in Moscow and other regions of Russia	—	—	—	58	—	—	86	20	66
• in the Trans-Baikal Territory	—	—	—	4	—	—	2	0	2

**New and terminated employments (by gender, age and region of operations) employees**

GRI 401-1

Indicator	2021	2022	2023
<b>New hires, including:</b>	<b>17,642</b>	<b>20,726</b>	<b>13,344</b>
• male	12,568	14,926	9,824
• female	5,074	5,800	3,520
29 y. o. and below	6,077	7,099	5,593
30 through 44 y. o.	8,098	9,485	5,387
45 y. o. and above	3,467	4,142	2,364
• in the Norilsk Industrial District	12,125	14,693	8,304
• in the Kola Peninsula (Murmansk Region)	1,327	1,846	1,334
• in the Krasnoyarsk Territory (except for NID)	923	964	781
• in Moscow and other regions of Russia	2,648	2,656	1,807
• in the Trans-Baikal Territory	619	567	1,118
<b>Terminated employments, including:</b>	<b>14,803</b>	<b>14,281</b>	<b>13,484</b>
• male	10,697	10,366	9,968
• female	4,106	3,915	3,516

Indicator	2021	2022	2023
29 y. o. and below	3,534	4,032	3,941
30 through 44 y. o.	6,255	5,546	5,336
45 y. o. and above	5,022	4,703	4,207
• in the Norilsk Industrial District	10,065	10,416	8,399
• in the Kola Peninsula (Murmansk Region)	1 616	1 345	1 587
• in the Krasnoyarsk Territory (except for NID)	973	795	863
• in Moscow and other regions of Russia	1 593	1 308	1 724
• in the Trans-Baikal Territory	564	417	911

**Employee outflow ratio by region**

%

Indicator	2021	2022	2023
Kola Peninsula (Murmansk Region)	13.6	10.8	13.1
Krasnoyarsk Territory (excluding NID)	23.9	23.0	25.6
Moscow and other regions of Russia	23.9	16.3	21.1
Norilsk Industrial District (NID)	19.6	18.8	15.2
Trans-Baikal Territory	20.8	14.6	29.7

**Employee inflow ratio by region**

%

Indicator	2021	2022	2023
Kola Peninsula (Murmansk Region)	11.1	14.9	11.0
Krasnoyarsk Territory (excluding NID)	22.7	27.9	23.2
Moscow and other regions of Russia	39.7	32.8	22.1
Norilsk Industrial District (NID)	23.7	26.5	15.0
Trans-Baikal Territory	22.8	19.8	36.5

**Employee outflow ratio by gender and age**

Indicator	2021	2022	2023
Employee outflow, total	19.4	17.4	16.4
Employee outflow, male	19.9	17.9	17.3
Employee outflow, female	18.0	16.1	14.4
Employee outflow, 29 y. o. and below	31.5	32.3	32.6
Employee outflow, 30 through 44 y. o.	16.7	13.1	12.8
Employee outflow, 45 y. o. and above	20.0	17.1	14.9

**Employee inflow ratio by gender and age**

Indicator	2021	2022	2023
Employee inflow, total	23.1	25.2	16.3
Employee inflow, male	23.3	25.8	17.0
Employee inflow, female	22.3	23.9	14.5
Employee inflow, 29 y. o. and below	54.1	63.2	46.3

**Assessment of employees in Russia**

% of average headcount

GRI 404-3

Indicator	2021				2022				2023			
	Blue-collar employees	White-collar employees	Managers	Group total	Blue-collar employees	White-collar employees	Managers	Group total	Blue-collar employees	White-collar employees	Managers	Group total
<b>Managerial and corporate competency assessment</b>												
Share of employees covered by competency assessment	0.7	19.7	36.3	10.0	0.6	22.4	47.5	12.6	2.3	40.4	45.5	17.8
Share of male employees covered by competency assessment	0.8	25.3	38.0	10.0	0.6	25.6	43.7	11.1	2.3	34.3	43.8	14.1
Share of female employees covered by competency assessment	0.2	17.9	31.1	9.9	0.6	19.7	58.8	19.0	2.6	45.9	50.4	27.1
<b>Professional competency assessment</b>												
Share of employees covered by competency assessment	0.7	15.5	36.1	8.9	0.7	19.7	36.3	10.0	2.0	23.7	21.5	9.9
Share of male employees covered by competency assessment	0.7	28.6	33.9	9.4	0.8	25.3	38.0	10.0	2.3	28.5	24.4	9.9
Share of female employees covered by competency assessment	0.4	5.2	43.1	7.8	0.2	17.9	31.1	9.9	0.6	19.2	13.0	9.9
<b>KPI-based assessment</b>												
Share of employees covered by KPI-based assessment	0.1	50.2	64.0	19.9	0.04	60.1	59.5	22.1	0	62.2	60.7	23.6
Share of male employees covered by KPI-based assessment	0.1	45.5	60.0	15.6	0.02	56.0	54.3	16.6	0	58.8	57.2	18.4
Share of female employees covered by KPI-based assessment	0.1	54.4	76.6	31.0	0.1	63.7	75.4	35.9	0	65.3	70.7	36.7

Indicator	2021	2022	2023
Employee inflow, 30 through 44 y. o.	21.6	25.3	12.9
Employee inflow, 45 y. o. and above	13.8	16.6	8.3

**Number of employees on maternity and/or childcare leave and those back from maternity and/or childcare leave**

GRI 401-3

Indicator	2021	2022	2023
Employees on maternity and/or childcare leave as at the year-end, including:	1,528	1,526	1,557
• male	58	69	91
• female	1,470	1,457	1,466
Employees back from maternity and/or childcare leave over the year, including:	771	592	623
• male	51	39	61
• female	720	553	562

**Key occupational injury and occupational disease rates by gender in 2021–2023**

GRI 403-9, 403-10

Indicator <sup>1</sup>	2021	2022	2023
Fatal workplace injuries, including:	11	4	5
• Men	11	3	5
• Women	0	1	0
FIFR	0.1	0.034	0.042
Lost time workplace injuries, including:	42	67 <sup>2</sup>	78
• Men	36	57	69
• Women	6	10	9
LTIFR	0.38	0.58 <sup>2</sup>	0.65
Severe occupational injury rate	0.12	0.11	0.12
Total recorded workplace injuries in accordance with the Russian labour laws (minor + severe + fatal), including:	53	71 <sup>2</sup>	83
• Men	47	60	74
• Women	6	11	9
Severe injuries	13	13	15
• Men	11	11	15
• Women	2	2	0
Occupational diseases	213	174	145
• Men	202	156	131
• Women	11	18	14
Occupational disease rate	1.94	1.49	1.21
Lost day rate	23.39	20.75	23.21
Absentee rate <sup>3</sup>	3.58	3.57	3.77

<sup>1</sup> Across Norilsk Nickel Group

<sup>2</sup> The 2022 values were updated as regards the values shown in the 2022 Sustainability Report.

<sup>3</sup> Number of absentee rate for Moscow and other regions exclude Zapolyarye Health Resort.

Indicator <sup>1</sup>	2021	2022	2023
Injury rate <sup>2</sup>	0,48	0,61 <sup>3</sup>	0,69
Hours worked, million	109,95	116,5	120,1
Total recorded workplace injuries among contractors' employees engaged at the Group's sites, in accordance with the Russian labour laws:	30	46	32
• Men	30	43	27
• Women	0	3	5
Including fatalities:	2	4	7
• Men	2	4	7
• Women	0	0	0

**Employees and contractors covered by the corporate Health and Safety Management System (HSMS)**

GRI 403-8

Indicator	HSMS coverage	Including HSMS that underwent an internal audit	Including HSMS that underwent an external audit or another independent review
Headcount of the Group's business units covered by HSMS	80,677	68,609	28,109
Share of employees of the Group's business units covered by HSMS in the Group's total headcount, %	100	85	35
Headcount of contractors working at the Group's sites and covered by HSMS	15,754	14,916	3,723
Share of employees of contractors covered by HSMS in the total headcount of contractors, %	100	94.7	23.6

<sup>1</sup> Across Norilsk Nickel Group

<sup>2</sup> The injury rate is calculated per 1 million hours worked and takes into account the number of individuals affected by lost-time injuries or fatalities.

<sup>3</sup> The 2022 values were updated as regards the values shown in the 2022 Sustainability Report.

Fines and non-financial sanctions related to environmental and social impacts in 2023

GRI 2-27

Indicator	Total number of non-compliances with laws and/or regulations during the reporting period	Number of non-compliances with laws and/or regulations during the reporting period: cases resulting in fines	Number of non-compliances with laws and/or regulations during the reporting period: cases resulting in non-financial sanctions	Total number of fines for non-compliance with laws and/or regulations paid during the reporting period	Including fines for non-compliance with laws and/or regulations that occurred during the reporting period	Including fines for non-compliance with laws and/or regulations that occurred in previous reporting periods	Total amount of fines paid during the reporting period, RUB	Including fines imposed in the current reporting period, RUB	Including fines imposed in previous reporting periods, RUB
<b>TOTAL FINES AND NON-FINANCIAL SANCTIONS</b>	<b>657</b>	<b>258</b>	<b>399</b>	<b>265</b>	<b>236</b>	<b>29</b>	<b>27,362,909</b>	<b>22,366,557</b>	<b>4,996,352</b>
Environmental laws and regulations	49	24	25	23	20	3	1,770,000	1,615,000	155,000
Anti-competitive behaviour and breach of antitrust laws	0	0	0	0	0	0	0	0	0
Non-compliance with labour laws	14	0	14	0	0	0	0	0	0
Non-compliance with occupational health and safety laws	33	16	17	17	17	0	1,360,000	1,360,000	0
Non-compliance with consumer protection laws, including with respect to product information and labelling	3	2	1	2	2	0	55,868	55,868	0
Non-compliance with marketing (advertising) regulations	0	0	0	0	0	0	0	0	0
Non-compliance with regulations on the impact of products and services on occupational health and safety	0	0	0	0	0	0	0	0	0
Failure to timely comply with the improvement notices issued by regulatory authorities	29	24	5	23	21	2	9,245,000	8,345,000	900,000
Non-compliance with fire safety requirements	14	1	13	0	0	0	0	0	0
Breach of sanitary and epidemiological laws unrelated to product requirements	22	11	11	10	10	0	105,000	105,000	0
Breach of capital construction laws	105	35	70	35	23	12	4,432,500	2,572,500	1,860,000
Breach of industrial safety laws	206	52	154	63	53	10	7,940,500	6,590,500	1,350,000
Breach of transportation security laws	31	1	30	0	10	0	0	0	0
Other grounds	151	92	59	92	90	2	2,454,041	1,722,689	731,352

# SASB METALS&MINING CONTENT INDEX

Topic	SASB code	Accounting metric	Disclosure	Page/link	Comment
Greenhouse gas emissions	EM-MM-110a.1	Gross global Scope 1 emissions	Full	<a href="#">Greenhouse Gas Emissions and Carbon Footprint of Products section</a>	—
		Percentage covered under emissions-limiting regulations	—	—	No emissions-limiting regulations are imposed in Russia.
	EM-MM-110a.2	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	Full	<a href="#">Approaches to Climate Change Management and Greenhouse Gas Emissions and Carbon Footprint of Products sections</a>	—
Air quality	EM-MM-120a.1	Air emissions of the following pollutants:			
		CO	Full	—	CO emissions in 2023 stood at 10,594.71 t
		NO <sub>x</sub> (excluding N <sub>2</sub> O)	Full	<a href="#">Air section</a>	—
		SO <sub>x</sub>	Full	—	—
		Particulate matter (PM10)	Full	—	—
		Mercury (Hg)	Full	—	There were no air emissions of mercury in 2023
		Lead (Pb)	Full	—	Air emissions of lead and its inorganic compounds (expressed as lead) in 2023 stood at 9.54 t
		Volatile organic compounds (VOCs)	Full	—	Emissions of volatile organic compounds (VOCs) in 2023 amounted to 1,910.03 t.
Energy management	EM-MM-130a.1	Total energy consumed			
		Percentage grid electricity	Full	—	The share of grid electricity for 2023 was 71%
		Percentage renewable	Full	<a href="#">Energy Consumption and Efficiency section</a>	—
Water management	EM-MM-140a.1	Total fresh water withdrawn	Full	<a href="#">GRI Quantitative Indicators Disclosure appendix</a>	—
		Total fresh water consumed	Full	<a href="#">GRI Quantitative Indicators Disclosure appendix</a>	—
		Percentage of each in regions with High or Extremely High Baseline Water Stress	Full	<a href="#">GRI Quantitative Indicators Disclosure appendix</a>	—
	EM-MM-140a.2	Number of incidents of non-compliance associated with water quality permits, standards, and regulations	Not disclosed	—	—

Topic	SASB code	Accounting metric	Disclosure	Page/link	Comment	
Waste & hazardous materials management	EM-MM-150a.4	Total weight of non-mineral waste generated	Full	<a href="#">GRI Quantitative Indicators Disclosure appendix</a>	—	
	EM-MM-150a.5	Total weight of tailings produced	Full	<a href="#">Tailings and Waste section</a>	—	
	EM-MM-150a.6	Total weight of waste rock generated	Full	—	—	
	EM-MM-150a.7	Total weight of hazardous waste generated	Full	—	—	
	EM-MM-150a.8	Total weight of hazardous waste recycled	Full	—	—	
	EM-MM-150a.9	Number of significant incidents associated with hazardous materials and waste management	Full	—	There were zero significant incidents associated with hazardous materials and waste management in 2023	
	EM-MM-150a.10	Description of waste and hazardous materials management policies and procedures for active and inactive operations	Full	<a href="#">Tailings and Waste section</a>	—	
	Biodiversity impacts	EM-MM-160a.1	Description of environmental management policies and practices for active sites	Full	<a href="#">Biodiversity section</a>	—
		EM-MM-160a.2	Percentage of mine sites where acid rock drainage is:			
Predicted to occur			Not disclosed	—	—	
Actively mitigated			Not disclosed	—	—	
		Under treatment or remediation	Not disclosed	—	—	
EM-MM-160a.3	Percentage of:					
	proved reserves in or near sites with protected conservation status or endangered species habitat	Not disclosed	—	—		
	probable reserves in or near sites with protected conservation status or endangered species habitat	Not disclosed	—	—		

Topic	SASB code	Accounting metric	Disclosure	Page/link	Comment
Security, human rights & rights of indigenous peoples	EM-MM-210a.1	Percentage of: proved reserves in or near areas of conflict	Full	—	0%
		probable reserves in or near areas of conflict	Full	—	0%
	EM-MM-210a.2	Percentage of: proved reserves in or near indigenous land	Full	—	0%
		probable reserves in or near indigenous land	Full	—	0%
	EM-MM-210a.3	Discussion of engagement processes and due diligence practices with respect to human rights, indigenous rights, and operation in areas of conflict	Full	→ <a href="#">Interactions with Indigenous Minorities section</a>	—
	Community relations	EM-MM-210b.1	Discussion of process to manage risks and opportunities associated with community rights and interests	Full	→ <a href="#">Interactions with Indigenous Minorities section</a>
EM-MM-210b.2		Number and duration of non-technical delays	Full	—	No delays recorded
Labour relations	EM-MM-310a.1	Percentage of active workforce covered under collective bargaining agreements, broken down by local and foreign employees	Partial	→ <a href="#">Social Partnership Framework section</a>	—
	EM-MM-310a.2	Number and duration of strikes and lockouts	Full	—	No such incidents
Workforce health and safety	EM-MM-320a.1	All-incidence rate	Full	→ <a href="#">Work-related injuries section</a>	—
		Fatality rate	Full	—	—
		Near miss frequency rate (NMFR)	Full	—	—
	EM-MM-320a.2	Average hours of health, safety, and emergency response training for (a) full-time employees and (b) contractors	Partial	→ <a href="#">OHS Training section</a>	—
Business ethics and transparency	EM-MM-510a.1	Description of the management system for prevention of corruption and bribery throughout the value chain	Full	→ <a href="#">Business Ethics and Anti-Corruption section</a>	—
	EM-MM-510a.2	Production in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index	Full	—	We do not operate in such countries

Topic	SASB code	Accounting metric	Disclosure	Page/link	Comment
Tailing dump management	EM-MM-540a.1	Tailing dump inventory table: facility name, location, ownership status, operational status, construction method, maximum permitted storage capacity, current amount of tailings stored, consequence classification, date of most recent independent technical review, material findings, mitigation measures, site-specific emergency preparedness and response plan (EPRP)	Full	→ <a href="#">GRI Quantitative Indicators Disclosure appendix</a>	—
	EM-MM-540a.2	Summary of tailings management systems and governance structure used to monitor and maintain the stability of tailing storage facilities	Full	→ <a href="#">Tailings and Waste section</a>	—
	EM-MM-540a.3	Approach to development of emergency preparedness and response plans (EPRPs) for tailing dumps	Full	—	—
Activity metric	EM-MM-000.A	Production of: Metal ores	Not disclosed	—	Please see the information in the <a href="#">2023 Annual Report</a>
		Finished metal products	Full	→ <a href="#">Our highlights section (form more details please see the 2023 Annual Report)</a>	—
		Total number of employees, percentage of contractors	Partial	→ <a href="#">HR Management section</a>	—

# UNCTAD GUIDANCE ON CORE INDICATORS FOR ENTITY REPORTING ON CONTRIBUTION TOWARDS IMPLEMENTATION OF THE UN SDGS

UNCTAD indicator	Page	Disclosure status	Information/comments	
<b>A Economic indicators</b>				
A.1 Revenue and/or (net) added value	A.1.1: revenue	15	Disclosed	RUB 1,231.7 bn
	A.1.2: added value	—	Disclosed	RUB 825.4 bn
	A.1.3: net added value	—	Disclosed	RUB 736.8 bn
A.2 Payments to the Government	A.2.1: taxes and other payments to the Government	154	Disclosed	In 2023, tax and non-tax payments totalled RUB 281 bn  VAT is not included in taxes since this tax is indirect and actually paid by end consumers of products and services rather than by the reporting entity. VAT is also excluded from the calculation of profit (loss) and is not disclosed in the Income Statement.
A.3 New investment/expenditures	A.3.1: green investment	—	Disclosed	RUB 98.1 bn  The expenditures in question make 8% of the Company's consolidated revenue for 2023.
	A.3.2: community investment	153	Disclosed	RUB 43.7 bn  The expenditures in question make up 3.5% of the Company's consolidated revenue for 2023
	A.3.3: total expenditures on research and development	364	Disclosed	RUB 198.9 mln  The expenditures in question make 0.02% of the Company's consolidated revenue for 2023.
A.4 Local supplier/purchasing programmes	A.4.1: percentage of local procurement	—	Partially disclosed	Data is collected for materials and supplies only. As for other procurement categories, there is no centralised data collection broken down by the location of suppliers. Materials and supplies procured from Russian suppliers make 98.8% of total procurements in this category.
<b>B Environmental indicators</b>				
B.1 Sustainable use of water	B.1.1: water recycling and reuse	226	Disclosed	Reused and recycled water makes up 82.7% of total water consumption
	B.1.2: water use efficiency	—	Disclosed	The ratio between water withdrawal and net added value is 400 m <sup>3</sup> / RUB mln
	B.1.3: water stress	225	Disclosed	No water is withdrawn in water-scarce areas.

UNCTAD indicator	Page	Disclosure status	Information/comments	
B.2 Waste management	B.2.1: reduction of waste generation	417	Disclosed	In 2023, waste generation increased to 176.9 mt from 166.3 mt in 2022. The ratio between waste generation and net added value increased from 203 t to 240 t / RUB mln
	B.2.2: waste reused, re-manufactured and recycled	232	Disclosed	In 2023, the amount of waste recycled remained flat (29.9 mt in 2022) The ratio between waste recycling and net added value increased from 36.7 t to 40.6 t / RUB mln
	B.2.3: hazardous waste	419	Disclosed	In 2023, hazard classes 1–4 waste generation increased to 1.604 kt from 1.535 kt in 2022. The ratio between such waste generation and net added value went up from 1.88 t to 2.18 t / RUB mln
B.3 Greenhouse gas emissions	B.3.1: greenhouse gas emissions (scope 1)	276	Disclosed	The absolute relative amount of scope 1 GHG Emissions remained flat y-o-y at 5.9 mt of CO <sub>2</sub> equivalent
	B.3.2: greenhouse gas emissions (scope 2)	276	Disclosed	The absolute relative amount of scope 2 GHG Emissions remained flat at 0.5 mt of CO <sub>2</sub> equivalent
B.4 Ozone-depleting substances and chemicals	B.4.1: ozone-depleting substances and chemicals	—	Disclosed	No emissions
B.5 Energy consumption	B.5.1: renewable energy	282	Partially disclosed	The Report discloses the amount of electric power generated by HPPs and its share in total energy consumption. The current metering system does not allow the disclosure to be made in full compliance with UNCTAD guidelines. Along with in-house generation, Norilsk Nickel Group purchases electric power from third parties connected to Russia's unified energy system. In 2023, the share of power from renewable sources amounted to 55% for the Group and 58% for assets in the Norilsk Industrial District. For more details, please see the <a href="#">Climate Change</a> section.  Share of renewable energy in the Norilsk Industrial District's total energy consumption: <ul style="list-style-type: none"><li>total electricity consumption: 6.9 bn kWh;</li><li>share of electricity generation and consumption from renewable energy sources (HPPs) in the NID: 58%.</li></ul> Electric power sold to retail consumers and third parties in the Norilsk Industrial District: <ul style="list-style-type: none"><li>Total electric power sold to retail consumers and third parties: 1.02 bn kWh, including HPP generated: 591 mln kWh</li></ul>
	B.5.2: energy efficiency	—	Disclosed	In 2023, the ratio between total energy consumption by the Group and net added value was 0.19 TJ / RUB mln
<b>C Social area</b>				
C.1 Gender equality	C.1.1: proportion of women in managerial positions	80, 297	Disclosed	The proportion of women in managerial positions is 26%  The proportion of women on the Management Board is 36% (4 out of 11 members)

UNCTAD indicator		Page	Disclosure status	Information/comments
C.2 Human capital	C.2.1: average hours of training per year per employee	92	Disclosed	88 hours
	C.2.2: expenditure on employee training per year per employee	93	Disclosed	Expenditure on employee training per year per employee: <ul style="list-style-type: none"> <li>For all employee categories – RUB 16,800</li> <li>Blue-collar employees – RUB 10,000</li> <li>Managers – RUB 36,000</li> <li>White-collar employees – RUB 15,000</li> </ul>
	C.2.3: employee wages and benefits with breakdown by employment type and gender	86	Partially disclosed	Data is disclosed on wages and remuneration package (excluding insurance contributions); the data disclosed is broken down by region, gender, category, and age. There is no statistics on wages and benefits broken down by labour contract type or employment type.
C.3 Employee health and safety	C.3.1: expenditures on employee health and safety	134	Disclosed	Expenditures on employee health and safety make up 1.4% of the Group's consolidated revenue.
	C.3.2: frequency/incident rates of occupational injuries	130, 131, 434	Partially disclosed	The Report discloses information about the occupational injury rate and lost day rate in accordance with the GRI requirements.
C.4 Coverage of collective agreements	C.4.1: percentage of employees covered by collective agreements	100	Disclosed	94.02% of the Group's employees are covered by collective bargaining agreements.
<b>D Institutional area</b>				
D.1 Corporate governance disclosures	D.1.1: number of Board meetings and attendance rate	292	Disclosed	Number of Board of Directors meetings – 46 Attendance rate – 100%
	D.1.2: number and percentage of female Board members	292	Disclosed	The proportion of women on the Board of Directors is 31% (4 out of 13 members)
	D.1.3: Board members by age range	292	Disclosed	Disclosed in the <a href="#">2023 Annual Report</a>
	D.1.4: number of meetings of the audit committee and attendance rate	—	Disclosed	Number of meetings of the Audit Committee – 16 Attendance rate – 100%
	D.1.5: compensation: total compensation per Board member(both executive and non-executive directors)	—	Disclosed	The <a href="#">2023 Annual Report</a> discloses the total amount of compensations paid to the members of the Board of Directors.
D.2 Anti-corruption practices	D.2.1: amount of fines paid or payable due to settlements	436	Disclosed	–
	D.2.2: average hours of training on anti-corruption issues per year per employee	347	Partially disclosed	No records are kept on the length (in hours) of anti-corruption training. Reporting in the Company is based on the GRI standards; it means the Report discloses the number and proportion of employees trained in anti-corruption policies and practices.

# TCFD DISCLOSURES

Section	Disclosure	Page	Assured by the auditor
<b>Governance</b> Describe the Board's oversight of climate-related risks and opportunities	a) Describe the Board's oversight of climate-related risks and opportunities	256	Assured
	b) Describe the management's role in assessing and managing climate-related risks and opportunities	60, 256	Assured
<b>Strategy</b> Disclose the actual and potential impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning	a) Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term	265	Not assured
	b) Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning	38, 260, 274	Assured
	c) Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2 °C or lower scenario	38, 266, 272	Assured
<b>Risk management</b> Describe how the organisation identifies, assesses, and manages climate-related risks	a) Describe the organisation's processes for identifying and assessing climate-related risks	265, 303	Not assured
	b) Describe the organisation's processes for managing climate-related risks	265, 302	Assured
	c) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management	302	Assured
<b>Metrics and targets</b> Disclose the metrics and targets used to assess and manage relevant climate-related risks	a) Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process	44	Assured
	b) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks	276, 278	Assured
	c) Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets	44	Assured

# PILOT DISCLOSURE UNDER IFRS S2<sup>1</sup>

Section	Disclosure	Page
<b>Governance</b> Controls and procedures the entity uses to monitor and manage climate-related risks and opportunities	6 (a): Indicate the governance body (individual) responsible for overseeing climate-related risk and opportunity management	
	(i) how responsibilities for climate-related risks and opportunities are reflected in the mandates, role descriptions and other related policies applicable to that body	256-258
	(iii) how and how often the body is informed about climate-related risks and opportunities	258
	(v) how the body oversees the setting of targets related to climate-related risks and opportunities, and monitors progress towards those targets, including whether and how related performance metrics are included in remuneration policies	256-258, 262
	6 (b): Describe the role of executive management in the processes and procedures for the management and oversight of climate-related risks and opportunities	
	(i) whether the role is delegated to a specific officer or collegial governance body (committee) and how oversight is exercised over that officer or body	256-258
<b>Strategy</b> The approach the entity uses to manage climate-related risks and opportunities	10 (a): Describe climate-related risks and opportunities that could reasonably be expected to affect the entity's prospects	265
	10 (b): explain, for each climate-related risk the entity has identified, whether the entity considers the risk to be a climate-related physical risk or climate-related transition risk	265
	10 (c): specify, for each climate-related risk and opportunity the entity has identified, over which time horizons (short, medium or long term) the effects of each climate-related risk and opportunity could reasonably be expected to occur	The Company assesses physical risks on a short-term horizon up to 2028. For market risks, a general assessment has been completed for the horizons up to 2030, 2040 and 2050
	13 (a): Describe the current and expected impact of climate-related risks and opportunities on the entity's business model and value chain.	274
	13 (b): Indicate which parts of the entity's business model / value chain are characterised by climate-related risks and opportunities	267-269
	14 (a): Explain how the entity plans to achieve any climate-related targets it has set and any targets it is required to meet by law or regulation	
	(ii) current and anticipated direct mitigation and adaptation efforts	262-264, 270-271, 275, 282, 285

Section	Disclosure	Page
	(v) how the entity plans to achieve any climate-related targets, including any greenhouse gas emissions targets	270-271, 275, 282, 285
	14 (b): information about how the entity is resourcing, and plans to resource, the activities disclosed in accordance with paragraph 14(a)	The Environmental and Climate Change Strategy allocates a budget for climate-related activities
	14 (c): Provide quantitative and qualitative information about the progress of plans disclosed in previous reporting periods	44, 255
	22 (a): Disclose information about the entity's assessment of the climate resilience of its strategy and business model as at the reporting date	274
	22 (b): Indicate how and when the climate-related scenario analysis was carried out	266, 272
<b>Risk management</b> Procedures the entity uses to identify, assess, prioritise, and monitor climate-related risks and opportunities	25 (a): Describe the process of identifying, assessing, and prioritising climate-related risks	
	(ii) whether and how the entity uses climate-related scenario analysis to identify climate-related risks	266-275
	(v) how the entity monitors climate-related risks	268-273
	(vi) whether and how the entity has changed the processes it uses compared with the previous reporting period	Approaches to risk identification and assessment compared to the data in the <a href="#">Climate Change Report</a> have not changed
	25 (b): Describe the processes used by the entity to identify, assess, prioritise, and monitor climate-related opportunities, including whether the entity uses climate change scenario analysis to identify climate-related opportunities	266-275
<b>Metrics and targets</b> The entity's performance in relation to sustainability/climate-related risks and opportunities, including progress towards the entity's objectives set by the entity or required by law or regulation	29 (a): Disclose Scope 1, 2 and 3 GHG emissions and approaches to measurement methodology	276-278
	29 (e): Disclose the amount of capital expenditures, investments, and other types of financing allocated to projects associated with climate-related risks and opportunities	254
	29 (f): Disclose information on the entity's application of an internal carbon price mechanism	262
	29 (g) (i): Provide a description of whether and how climate-related considerations are factored into executive remuneration	262
	33: Disclose the quantitative and/or qualitative climate-related goals and targets that the entity has set to monitor progress towards its strategic objectives, as well as the targets it is required to meet by law or regulation (including GHG emission targets), including:	
	33 (a): the metric used to set the target	44
	33 (d): the period over which the target applies	44
	33 (g): if the target is quantitative, whether it is an absolute target or an intensity target	44
	Applicable metrics from SASB Metals & Mining Sustainability Accounting Standard as specified in the Industry-Based Guidance on Implementing IFRS S2: EM-MM-110a.1, EM-MM-110a.2, EM-MM-130a.1, EM-MM-140a.1, EM-MM-140a.2, EM-MM-000.A, EM-MM-000.B	
		<a href="#">→ This information has been disclosed in the SASB METALS&amp;MINING Content Index appendix</a>

<sup>1</sup> Disclosure is limited to IFRS S2 requirements. For the remaining elements the Company continues to improve its governance, accounting, and reporting frameworks for future disclosure.

# DISCLOSURE UNDER ORDER OF THE MINISTRY OF ECONOMIC DEVELOPMENT OF RUSSIA NO. 764 DATED 1 NOVEMBER 2023

No.	Disclosure	Unit of measurement	2021	2022	2023	Source	Comments
<b>Economic indicators</b>							
1	Revenue	RUB bn	1,316.9	1,184.5	1,231.7	2023 Sustainability Report, page 438	—
2	Added value	RUB bn	901.2	891.4	825.4		—
3	Net added value	RUB bn	833.1	817.7	736.8		—
4	Total expenditure on research and development	RUB mln	241.43	84.3	198.8		—
5	Labour productivity	—	—	—	—		The indicator is not disclosed.
6	Total mandatory payments accrued (excluding fines and penalties), including: <ul style="list-style-type: none"> <li>taxes and levies</li> <li>insurance contributions</li> <li>other mandatory payments</li> </ul>	RUB bn	—	—	—		The Company will consider disclosing this information within three years.
7	Total mandatory payments paid (excluding fines and penalties), including: <ul style="list-style-type: none"> <li>taxes and levies</li> <li>insurance contributions</li> <li>other mandatory payments</li> </ul>	RUB bn	287	262	281	2023 Sustainability Report, page 154	The Report presents tax and non-tax payments to budgets of various levels.
8	Domestically sourced goods, work, and services in total procurement of goods, work, and services	%	96	95	99	<a href="#">2021 Sustainability Report, page 252</a> <a href="#">2022 Sustainability Report, page 319</a> 2023 Sustainability Report, page 438	Data is collected for materials and supplies only. As for other procurement categories, there is no centralised data collection broken down by the location of suppliers.
9	Procurement of goods, works, and services from small and medium-sized businesses in total procurement from Russian companies	%	—	—	—		The <a href="#">Development of Local Communities</a> section discloses information on the Company's expenses associated with procurement from suppliers in the key regions of operation.

No.	Disclosure	Unit of measurement	2021	2022	2023	Source	Comments
10	Sustainable investment (including green investment)	RUB bn	103.7	130.4	141.8	2023 Sustainability Report, page 153, 219	Operating environmental expenditure and capital investments to ensure environmental protection and sustainable use of natural resources
11	Investments in projects related to achieving technological sovereignty and structural adaptation of the Russian economy	RUB bn	—	—	—		The indicator is not disclosed. The Company will consider disclosing this information within three years.
12	Economic exposure of business and other operations to climate risks	—	—	—	—		
<b>Environmental indicators</b>							
13	Water used from all water supply sources	mcm	1,280.8	1,345.9	1,291.9	2023 Sustainability Report, page 410	—
14	Recirculating and recycling water supply	mcm %	1,083.6 84.6	1,104.9 81.8	1,067.8 82.7	2023 Sustainability Report, page 410	—
15	Total effluents, including untreated water	mcm	94.1 60.3	74.8 40.7	73.0 40.8	2023 Sustainability Report, page 411	—
16	Water use efficiency (per unit consumption)	mcm / RUB bn	1.5	1.6	1.7	Estimated value (item 13 ÷ item 3)	—
17	Total generated waste of hazard classes 1–5, including: <ul style="list-style-type: none"> <li>hazard class 1</li> <li>hazard class 2</li> <li>hazard class 3</li> <li>hazard class 4</li> <li>hazard class 5</li> </ul>	kt	156,416.09	166,277.8	176,894.4	<a href="#">2021 Sustainability Report, page 240.</a> <a href="#">2022 Sustainability Report, page 337-338.</a> 2023 Sustainability Report, page 415	For more details on waste generation by hazard class, please see the <a href="#">GRI Quantitative Indicators Disclosure</a> appendix
18	Total management of waste of hazard classes 1–5, including: <ul style="list-style-type: none"> <li>disposed of waste</li> <li>neutralised waste</li> <li>landfilled waste</li> <li>reused waste</li> <li>recycled waste</li> <li>reduction of waste generation</li> </ul>	kt	29,464.9	34,540.7	35,055.1	<a href="#">2021 Sustainability Report, page 240.</a> <a href="#">2022 Sustainability Report, page 337-338.</a> 2023 Sustainability Report, page 415	Waste handed over for economic utilisation and eliminated (disposed of, neutralised, or landfilled at intragroup facilities or by contractors). For a breakdown by category, please see the <a href="#">GRI Quantitative Indicators Disclosure</a> appendix
19	Air pollutant emissions from stationary sources	kt	1,646.9	1,819.4	1,707.7	2023 Sustainability Report, page 412	—

No.	Disclosure	Unit of measurement	2021	2022	2023	Source	Comments
20	Greenhouse gas (GHG) emissions	mt of CO <sub>2</sub> equivalent	10.3	9.9	9.7	2023 Sustainability Report, page 276	Scope 1 and 2 (including a GHG emissions provision for the Sulphur Programme and GHG emissions generated from heat and electricity supply to households)
21	Total environmental protection expenditure, including: <ul style="list-style-type: none"> <li>air protection and climate change prevention</li> <li>wastewater collection and treatment</li> <li>waste management</li> <li>preservation of biodiversity and protection of natural areas</li> </ul>	RUB bn	18.1	34.4	37.8	2023 Sustainability Report, page 219	Operating environmental protection expenditures
22	Renewable and low-carbon energy consumption	TJ, %	47	51	55	2023 Sustainability Report, page 282	—
23	Energy efficiency: energy consumption per unit of net added value	TJ / RUB '000	0.19	0.18	0.19	2023 Sustainability Report, page 439	—
<b>Social indicators</b>							
24	Total labour expenses	RUB mln	164,740	224,512	234,869	<a href="#">Consolidated Financial Statements for the years ended 31 December 2023, 2022, 2021, page 61</a>	—
25	Total average headcount, including employees with disabilities	'000 employees	73.6	78.4	80.6	2023 Sustainability Report, page 78	Number of employees with special needs is not disclosed
26	Total average payroll, including: <ul style="list-style-type: none"> <li>by position</li> <li>by gender</li> <li>by age</li> </ul>	RUB '000	145.1	182.5	184.1	2023 Sustainability Report, page 10	Average payroll by position, gender, age is disclosed starting from 2023 (page 86)
27	Total occupational health and safety expenses, including average per employee	RUB bn RUB '000	12.7 177	21.6 272	17.5 218	2023 Sustainability Report, page 134	—

No.	Disclosure	Unit of measurement	2021	2022	2023	Source	Comments
28	Expenditure on preparing and holding social, sports and recreation and healthcare events for employees and their family members	RUB mln	13,158	15,254	16,442	2023 Sustainability Report, page 104	—
29	Injuries with lost time of one working day or more and fatalities, including fatalities	People	53	71	83	2023 Sustainability Report, page 430	—
		people	11	4	5		
30	Total expenditure on employee training, including average per employee	RUB mln RUB '000	952 18.3	1,447 21.1	1,277 16.8	2023 Sustainability Report, page 93	—
31	Average number of training hours per year per employee by position		69.2	85	88	2023 Sustainability Report, page 92	—
32	Share of employees covered by collective bargaining agreements in the average headcount	%	94.0	94.4	94.0	2023 Sustainability Report, page 100	—
33	Employee turnover	%	12.2	10.5	11.4	2023 Sustainability Report, page 82	—
34	Total expenses associated with social programmes not aimed at employees and their family members, including: <ul style="list-style-type: none"> <li>charitable</li> <li>housing</li> <li>healthcare</li> <li>educational</li> <li>social assistance</li> </ul>	RUB bn	40.5	34.3	27.3	2023 Sustainability Report, page 153	Nornickel's social infrastructure, social, charity, and sponsorship expenses (excluding expenses related to social programmes and benefits for employees). For a breakdown of expense items, please see page 153
<b>Governance indicators</b>							
35	Sustainable development policy and/or other relevant strategic documents in place	—	Yes	Yes	Yes	<a href="#">2021 Sustainability Report, page 23-34.</a> <a href="#">2022 Sustainability Report, page 230-234.</a> 2023 Sustainability Report, page 58	—
36	Number and attendance of Board of Directors meetings	%	43 100	38 100	46 100	<a href="#">2021 Sustainability Report, page 253.</a> <a href="#">2022 Sustainability Report, page 323.</a> 2023 Sustainability Report, page 292	—

No.	Disclosure	Unit of measurement	2021	2022	2023	Source	Comments
37	Total number of directors, including by age groups	people	13	13	13	2021 Sustainability Report, page 171. 2022 Sustainability Report, page 224. 2023 Sustainability Report, page 291-292	For more details on the Board of Directors, please see the Company's annual reports
38	Number and attendance of the Audit Committee meetings		12 100	15 100	16 100	2021 Sustainability Report, page 253. 2022 Sustainability Report, page 323. 2023 Sustainability Report, page 440	—
39	Participation in ESG indices and ratings	—	Yes	Yes	Yes	2021 Sustainability Report, page 34. 2022 Sustainability Report, page 234. 2023 Sustainability Report, page 64	—
40	Violations of the rights of Russia's indigenous minorities		0	0	0	2021 Sustainability Report, page 150. 2022 Sustainability Report, page 186. 2023 Sustainability Report, page 171	—
41	Employees occupying positions with a high degree of corruption risk exposure	—	—	—	—		The indicator is not disclosed. The Company will consider disclosing this information within three years.
42	Average hours of training on anti-corruption issues per year per employee	hours	—	—	—		No records are kept on the length (in hours) of anti-corruption training.
43	Administrative sanctions against the organisation, its subsidiaries, and affiliates for corruption		0	0	0	2021 Sustainability Report, page 196. 2022 Sustainability Report, page 252. 2023 Sustainability Report, page 346	—
44	Share of women in managerial positions in the total number of managers, including in the Board of Directors	% %	25 8	27 23	26 31	2023 Sustainability Report, page 14, 80	—

# NORNICKEL'S SUPPORT FOR INITIATIVES, STANDARDS, AND PARTICIPATION IN ASSOCIATIONS FOCUSED ON SUSTAINABLE DEVELOPMENT AND CORPORATE SOCIAL RESPONSIBILITY

## GRI 2-28

### International

#### UN initiatives

- [UN Global Compact](#)
- Sustainable Development Goals of the UN 2030 Agenda

#### Associations, charters, alliances, and initiatives

- [International Platinum Group Metals Association](#)
- [Nickel Institute](#)
- Together for Sustainability (TfS) initiative
- [Global Battery Alliance \(GBA\)](#)

### Russian

#### UN initiatives

- [National Global Compact Network](#)

#### Associations and charters

- [National ESG Alliance](#)
- National Association of International Information Security
- Security Charter for Critical Industrial Facilities
- [Social Charter of the Russian Business](#)
- [Anti-Corruption Charter of the Russian Business](#)
- [Environmental Charter of the Krasnoyarsk Territory](#)

# CERTIFICATION OF CORPORATE INTEGRATED MANAGEMENT SYSTEM (CIMS)

Company	Compliance with international standards	External audits in 2023	Certification body	Audit results	Certification scope
MMC Norilsk Nickel	ISO 9001:2015 ISO 14001:2015 ISO 45001:2018	Recertification audit	Bureau Veritas Certification (BVC)	Certificates for the new certification period were obtained: ISO 9001:2015, ISO 14001:2015 (seventh certification period), ISO 45001:2018 (second certification period).	Production, project management, storage, delivery, including by sea, and sales (nickel, copper, cobalt, precious metals, sulphur, selenium, tellurium)
Kola MMC	ISO 9001:2015 ISO 14001:2015 ISO 45001:2018	Surveillance audit of Corporate Integrated Management System (CIMS)	Bureau Veritas Certification (BVC)	The audit showed that the stated scope of certification is consistent with the operations carried out by Kola MMC.  Kola MMC's commitment to maintaining the performance of and upgrading the CIMS <sup>1</sup> to improve its operation was confirmed	Mining and processing of ore, production of nickel, cobalt, their compounds, precious metal concentrates, sulphuric acid
Gipronickel Institute	ISO 9001:2015	Surveillance audit	Societe Generale de Surveillance (SGS)	The quality management system of Gipronickel Institute is certified for compliance with the ISO 9001:2015 requirements.	R&D, design, engineering surveys, engineering and environmental activities, project management in mining, concentration and smelting. Development of standards for non-ferrous metal industry products and their inspection methods. Development of reference standards for non-ferrous metal industry products.
GRK Bystrinskoye	ISO 14001:2015	Certification audit	Certification body – IRCLASS IRQS	The environmental management system was certified for compliance with ISO 14001:2015 for the first certification period.	–

Company	Compliance with international standards	External audits in 2023	Certification body	Audit results	Certification scope
Pechengastroy	ISO 9001:2015 ISO 14001:2015 ISO 45001:2018	Certification audit	Quality Management Pursuant to International Standards LLC	Certificates of compliance with ISO 9001:2015, ISO 14001:2015, and ISO 45001:2018	Design, development, manufacturing, assembly, repair of parts, components, metal structures, machinery and equipment; maintenance and repair of industrial equipment, buildings and structures; capital construction and reconstruction of industrial facilities; welding operations, technical supervision; operation of motor vehicles, special-purpose machinery, and treatment facilities; sand and gravel extraction.
Norilsk Nickel Harjavalta	ISO 9001:2015 ISO 14001:2015 ISO 45001:2018	Surveillance audit	Bureau Veritas Certification (BVC)	Norilsk Nickel Harjavalta maintains certification to ISO 9001:2015, ISO 14001:2015, ISO 45001:2018	Manufacturing of nickel and cobalt products

<sup>1</sup> Corporate Integrated Management System.

# AWARDS AND ACCOLADES

## Social

- Nornickel won the Grand Prix at the 16th Russian national contest It's All about People: Companies Investing in the Future.
- We retained leadership in key rankings of the best employers:
  - 22nd place among 129 finalists (Russia's largest companies), 1st place among the largest industrial companies, 24th place in the Top 50 companies with highly developed HR processes according to HeadHunter;
  - employer group I consisting of 25 companies (without any ranking within) in the RBC Employer Rankings (November 2023);
  - gold prize awarded by Forbes in its 125 best employers rating, platinum prizes in the Employees and Society category and the Corporate Governance category, and gold prize in the Environment category;
  - Best Employer according to the Best Company Award 2024, a ranking compiled by Changellenge based on a survey of students and graduates from the leading universities: 1st place in the metals industry, 20th place in the Technical Professions nomination, 57th place in the Business Professions nomination, and the 53/57th places in the IT Professions nomination;
  - 8th place in the Best Employers among Their Target Audience category in Future Today's ranking, which takes into account the opinions of Russian university students;
  - best employer brand in the metals industry according to Crystal Pyramid 2023, an award for achievements in personnel and human capital management.
- Made with Care programme won in the WORKPLACE comfort category of the WOW!HR award and in the category Reconstruction of the Internal Environment for Users of an Industrial Facility according to the Green Property Awards.
- Building the Future: Nurturing Engineering Talent project:
  - 1st place in HR HERO, the nomination of the best integrated HR projects of the WOW!HR award;
  - 1st place in the category Best Project Contributing to the Development of Education in the Russian Federation according to the rating of the Donors Forum (Leaders of Corporate Charity project);
  - gold in the Federation Grand category of the 17th HR Brand award by HeadHunter;
  - 3rd place in the Human Resource Management. Large Business nomination at the 16th Russian national contest It's All about People: Companies Investing in the Future;
  - 1st place in the Employer Image category according to the International EMBRAS Awards (Employer Branding Awards);
  - diploma for contribution to addressing strategic human potential development issues of the Responsible Business Leadership national award.
- Let's Do It environmental marathon won a silver award in the Best Eco-Education Project nomination according to the Donors Forum rating (Leaders of Corporate Charity project).
- Plant of Goodness corporate volunteering programme took the 1st place in the Good Deeds category according to the International EMBRAS Awards (Employer Branding Awards).
- New People for New Industries: Recruitment without Borders programme ranked 2nd in the Business Result category of the International EMBRAS Awards (Employer Branding Awards).
- Tsifronickel Kids, an interactive digital project, was among the Top 3 winners of the national Graduate Award competition in the Best Project for Working with Schoolchildren category.
- Learning to Learn Digital Academy project won the Grand Prix in the HR Project of 2023 category of the Crystal Pyramid 2023 award.
- Career Navigator project received a silver award of the Creating the Future competition.
- Implementation of the Comprehensive Plan for Social and Economic Development of Norilsk through 2035 was awarded a diploma in the Contribution to Sustainable Development of Territories nomination of the Responsible Business Leadership national award.
- Zapolyarye Health Resort ranked among 5 winners of the Russian Hospitality Awards 2022 (Best Health Hotel nomination). Experts praised the quality and variety of the recreational services of the health resort, the high level of medical facilities and infrastructure in general.
- According to the results of the Best ESG Projects in Russia programme, the winners in the Gender Equality. Inclusion and Diversity category were MMC Norilsk Nickel and Women in Mining Russia (WIM RU).

## Environmental

- Nornickel was awarded for the best environmental project in the Russian Arctic (Clean Norilsk programme) based on the results of the 5th national contest of best environmental practices Reliable Partner in Ecology.
- Nornickel won the Sustainability Project of the Year nomination of the Russian Mining Excellence award for its Sulphur Programme.
- Nornickel won the Sustainable Development category of the Company of the Future award for implementing the first stage of the Sulphur Programme at Nadezhda Metallurgical Plant in Norilsk.
- The Sulphur Programme and the Clean Norilsk Programme were awarded diplomas of the Responsible Business Leadership national award

- for Contribution to Addressing Strategic Environmental and Climate Issues.
- Based on the results of the Best ESG Projects of Russia programme, Nornickel's technology for restoring bioproductivity of Arctic lakes won the nomination Conservation of Terrestrial Ecosystems. Support for Environmental Research and Education Projects.

## Innovation and technology

- Nornickel's solution (recording quantities during ore transportation) won the Mining Industry 4.0 contest for the best digitalisation project in the mining and metals sector in the Practical Import Substitution category.
- Supernika corporate application for employees was recognised as the IT project of the year
- in the mobile app category according to the national TADVISER IT Prize awards.
- Based on the results of the Best ESG Projects of Russia programme, Nornickel's digital twin of a plant for environmental monitoring won the Industry, Innovation and Infrastructure. Digital Transformation category.

- Murmansk Transport Division received a commendation from the Russian Ministry of Transport for its achievements in the upgrade of transport technologies and contribution to the safety of navigation.

## Competencies

- The PMO team of Nornickel's IT Department won the Project Olympus open nationwide competition, taking the 1st place in the Project Management System nomination and the 2nd place in the Competent Project Management Office nomination.
- Nornickel Sputnik service support line won two professional awards: Best Customer Service and Best Customer Service Manager.
- YRSC won the Shipping Company Engaged in River Cargo Transportation nomination. The experts praised the company's major achievements, safety and social responsibility.
- Nornickel's HR team was awarded the 2nd degree diploma of the Crystal Pyramid 2023 award.

## Information transparency and sustainability reporting<sup>1</sup>

- Moscow Exchange's Annual Report Competition – special diploma For High Quality of Sustainability Reporting and Maintaining Leadership in This Area.
- 2023 Visionaries. Change Management award – winner in the Best ESG Risk and Risk Management Disclosure category.
- 2022 Leaders of Russian Business: Dynamics and Responsibility contest – winner in the High Quality of Reporting on Sustainable Development nomination.
- 2023 Responsible Business Leadership national award – 1st degree winner and recipient of diplomas for contribution to addressing strategic issues in the relevant areas (nominations).
- ARC Awards International:
  - gold award in the category Sustainability Report: Americas & Europe (printed version);
  - silver award in the category Sustainability Report: Americas & Europe (interactive version);
- LACP Awards:
  - platinum award in the Best Sustainability Report category;
  - Top 1 in the Best Sustainability Report in Russia category;
  - Top 1 in the Best Sustainability Report in EMEA category;
  - silver award in the Best Cover Design of Sustainability Report category.
- Interfax and AK&M news agencies presented Norinickel with an annual award for its active corporate disclosure policy. The experts praised the user-friendly corporate website and financial and non-financial disclosures, the high quality of the Company's reporting, prompt disclosures of material facts, overall format, and openness in communicating with journalists.

## LIST OF ABBREVIATIONS

JSC	Joint-stock company
APCS	Automatic process control system
RES	Renewable energy sources
FOCL	Fibre optic communication lines
GOK	Mining and processing plant
GOST	State standard
Group	Norilsk Nickel Group
GJ	Gigajoule
HPP	Hydropower plant
VHI	Voluntary health insurance
IEEH	Integral Indicator of Ecosystem Health
CPI	Consumer price index
IT	Information technologies
ICC	Industrial Competence Centre
CIMS	Corporate Integrated Quality and Environmental Management System
Kola MMC	Kola Mining and Metallurgical Company
KPI	Key performance indicators
IPCC	Intergovernmental Panel on Climate Change
ILO	International Labour Organisation
PGM	Platinum group metals
IUCN	International Union for Conservation of Nature
IFRS	International Financial Reporting Standards
EMERCOM	Ministry of the Russian Federation for Civil Defence, Emergencies and Elimination of Consequences of Natural Disasters
VAT	Value added tax
R&D	Research and development
NPO	Non-profit organisation
NMP	Nadezhda Metallurgical Plant
NC	Norilsk Concentrator
NID	Norilsk Industrial District
NTEC	Norilsk-Taimyr Energy Company
CHI	Compulsory health insurance

<sup>1</sup> Including awards received in 2023 by Norinickel's Sustainability Report 2022 (unless otherwise stated).

UN	United Nations
LLC	Limited liability company
SPNA	Specially protected natural areas
OECD	Organisation for Economic Cooperation and Development
pp	Percentage point
PJSC	Public joint-stock company
OHS	Occupational health and safety
AML / CFT / prevention of WMD proliferation	Anti-money laundering / counter-terrorism financing / prevention of proliferation of weapons of mass destruction
RBU	Russian business unit
PPE	Personal protective equipment
CTL	Corporate Trust Line
CIS	Commonwealth of Independent States
FPIC	Free, Prior and Informed Consent
ISMS	Information Security Management System
TJ	Terajoule
CHP	Combined heat and power plant
PCF	Product carbon footprint
FZ	Federal law
SDGs	UN Sustainable Development Goals
DFA	Digital financial asset
UNESCO	United Nations Educational, Scientific and Cultural Organisation
UNIDO	United Nations Industrial Development Organisation
AA1000 SES	AccountAbility 1000 Stakeholders Engagement Standard
AA1000AP	Accountability Principles
AI	Artificial Intelligence
Ag	Silver
Au	Gold
BVC	Bureau Veritas Certification
CAM	Cathode materials
Co	Cobalt
CO <sub>2</sub> equivalent	Carbon dioxide equivalent
COP28	28th Conference of the Parties

COSO ERM	The Committee of Sponsoring Organisations of the Treadway Commission Enterprise Risk Management
Cu	Copper
DDMS	Due Diligence Management System
EBITDA	Earnings Before Interest, Taxes, Depreciation and Amortisation
ERP	Enterprise Resource Planning
ESG	Environmental, Social and Governance
FIFR	Fatal-Injury Frequency Rate
ICMM	International Council on Mining and Metals
Ir	Iridium
IRMA	Initiative for Responsible Mining Assurance
ISO	International Organisation for Standardisation
JDDS	Joint Due Diligence Standard
GHG Protocol	Greenhouse Gas Protocol
GISTM	Global Industry Standard on Tailings Management
GRC	Governance, Risk and Compliance
GRI	Global Reporting Initiative
GWP	Global warming potential
LTIFR	Lost Time Injury Frequency Rate
ML	Machine learning
Ni	Nickel
Pd	Palladium
PCAM	Precursors of cathode active materials
Pt	Platinum
Rh	Rhodium
REACH	Registration, Evaluation and Authorisation of CHemicals
RMI	Responsible Mining Index
Ru	Ruthenium
S	Sulphur
SAP	System Analysis and Program Development
SASB	Sustainability Accounting Standards Board
SCADA	Supervisory control and data acquisition
Se	Selenium
SO <sub>2</sub>	Sulphur oxide

SRM	Supplier relationship management
SSP	Shared Socioeconomic Pathways
TCFD	Task Force on Climate-related Financial Disclosures
Te	Tellurium
VPSHR	Voluntary Principles on Security and Human Rights
WRI	World Resources Institute
UNCTAD	The United Nations Conference on Trade and Development
UNGPs	United Nations Guiding Principles on Business and Human Rights

# GLOSSARY

- Business unit of the Company's Head Office:** department, division or any other unit within the organisational structure of the Company's Head Office approved by the President of MMC Norilsk Nickel and/or Senior Vice President for HR, Social Policy and Public Relations.
- Business units:** subsidiaries of MMC Norilsk Nickel.
- Certification:** confirming compliance of qualitative characteristics with quality standard requirements.
- Charitable activities:** the Company's voluntary transfer of property, including cash, free works and services, and other support, to legal entities or individuals free of charge or on preferential terms.
- Collective Bargaining Agreement:** legal instrument governing social and labour relationships within a company or a sole trader business and signed by the representatives of employees and the employer.
- Compliance:** conducting business in compliance with the requirements of government authorities, applicable laws, regulations, guidelines and standards, including corporate policies and procedures, and ethical business practices.
- Corporate culture:** combination of standards, values and beliefs that determine the way a company addresses the matters of internal integration and external adaptation, guide and motivate daily behaviour of employees, while also transforming under its influence.
- Corporate social responsibility (CSR):** corporate behaviour philosophy and concept applied by the business community, companies and company representatives to their activities aimed at meeting stakeholder expectations and ensuring sustainable development.
- Environmental protection and resource efficiency:** corporate programmes aimed at minimising the Company's environmental impact.
- Global Reporting Initiative (GRI):** independent organisation developing sustainability reporting guidelines and standards.
- Health and safety:** occupational health and safety protection system embracing legal, social, economic, organisational, technical, sanitary, hygienic, healthcare, rehabilitation and other activities.
- HR management policy:** end-to-end integrated HR management system including all stages of employee-employer interaction, from recruitment to retirement and post-retirement support.
- HR policy:** set of standards, rules, regulations, concepts and goals determining the Company's HR management practices (personnel planning and record keeping, recruitment, adaptation, training and development, remuneration and incentivisation, performance assessment, social security, etc.) in line with its development strategy.
- Human rights due diligence:** set of measures that includes assessing impacts and risks in the value chain and conducting business responsibly in order to prevent and mitigate human rights abuses and hold businesses accountable for such abuses in which the businesses may be implicated through their own operations or relationships.
- Incentivisation:** tools and methods of boosting staff performance and productivity, motivating an employee or a group of employees to achieve corporate goals.
- Local communities:** population with Russian citizenship.
- Mediation:** method of alternative dispute resolution based on finding a mutually acceptable solution through the mediation of an impartial third party (independent expert).
- Minetoken:** a digital financial asset linked in value to a share in MMC Norilsk Nickel.
- Mission:** statement of the Company's goals and objectives that distinguish it from its peers.
- Norilsk Industrial District:** a territory of municipalities that includes the city of Norilsk, the Taimyrsky Dolgano-Nenetsky Municipal District, and the Turukhansky District.
- Nornickel (Norilsk Nickel) Group for the purpose of the 2023 Sustainability Report, MMC Norilsk Nickel and the totality of operations forming Nornickel Group.** Unless otherwise specified or required by the context, the "Company", "Group", "Nornickel" or "the Group companies" shall refer to Nornickel Group.
- Occupational disease:** health disorder caused by a systematic and lasting exposure to workplace factors or a combination of production-specific working conditions.
- Payroll budget:** total payroll and social payments.
- Personnel development:** set of initiatives aimed at employee recruitment, adaptation, retention, and fully unlocking their professional and creative potential.
- Risk:** negative factor that might result from current processes or future events and have a potential impact on the Company's ability to achieve its goals.
- Safe working conditions:** working conditions where occupational exposure to harmful and/or hazardous production factors is prevented or controlled within the set limits.
- Senior executives:** President, Vice Presidents, heads of departments in case of the Head Office, and general directors and their deputies in case of entities located in the Norilsk Industrial District and on the Kola Peninsula.
- Significant regions of operation: Russian regions where the Company's core production is concentrated and key assets in terms of headcount (1,000 or more people) are located:** the Norilsk Industrial District, Krasnoyarsk Territory (except for the NID), Kola Peninsula (Murmansk Region), Trans-Baikal Territory, Moscow, and other Russian regions.

- **Social package:** set of benefits, compensations, additional payments, statutory and additional services provided to employees by the employer on top of their salary.
- **Social partnership:** framework of relationships among employees (their representatives), employers (their representatives), and federal and local government authorities aimed at reconciling interests of employees and employers on matters pertaining to the regulation of labour relations and other directly associated matters.
- **Social programmes:** voluntary corporate initiatives pertaining to employee development and motivation, creating favourable working conditions, promoting corporate culture and charity, and supporting local communities. These initiatives are implemented on a regular basis in line with the Company's business strategy, and focused on satisfying balanced requests of various stakeholders. From the management perspective, a social programme is a set of initiatives carefully planned in terms of resources, workforce and timeframes, and efficiently addressing the Company's internal or external social objectives.
- **Soil thawing:** process whereby soil receives heat in a quantity sufficient for its natural negative temperature to increase to 0 °C and also for its disseminated ice to turn to liquid.
- **Southern Cluster:** Nornickel's promising project to develop reserves in the northern part of the Norilsk-1 Deposit.
- **Stakeholder engagement:** the Company's activities aimed at identifying stakeholders' expectations and concerns and their engagement in the decision-making process.
- Stakeholders are individuals, legal entities, groups, associations and other organisations whose interests can be potentially affected by the Company's operations, as well as parties that can influence it. Stakeholders include the Company's shareholders, investors, employees, suppliers, contractors, consumers,

- trade unions and other public organisations, federal and local authorities, mass media, residents of areas where the company operates, and others.
- **Standard:** regulation containing a set of requirements for activities and their products.
- **Sulphur Programme:** Nornickel's largest and most important environmental initiative, providing for a phased reduction of sulphur dioxide emissions in the Norilsk Industrial District and on the Kola Peninsula, as well as the establishment of green production.
- **Sustainability Report (non-financial report):** accessible, accurate and balanced description of the main aspects of the Company's activities and achievements pertaining to its values, goals and sustainable development policy, and addressing the matters of most importance for the key stakeholders. This is a way of publicly informing the shareholders, employees, partners and other stakeholders of the Company's progress towards its goals and objectives set out in its mission statement and strategic development plans with respect to financial and environmental stability, and social security.
- **Sustainable development:** concept developed by the UN that acknowledges the role of business in ensuring sustainable development of the society; a concept of global community development taking into account interests of both present and future generations.
- **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 RECOMMENDATIONS

The Company is committed to information transparency and strives to regularly provide stakeholders with up-to-date information on its operations, results,

social programmes for employees and local communities, events, and the status of its ESG agenda. Nornickel holds annual dialogues with stakeholders while drafting

sustainability reports. 27 November 2023 saw a foresight dialogue titled “Staying on track for a sustainable future: 20 years of Nornickel's non-financial reporting”<sup>1</sup>.

## Stakeholder dialogue minutes

**Date and time:** 27 November 2023, 10:00 am –12:00 noon

**Format:** live-streamed in-person meeting.

**Target audience:** managers and employees of the Company; regional and local authorities, local communities, non-profit organisations, investment community, businesses, rating agencies, ESG experts.

**Event purposes:**

- receiving recommendations and other feedback from a wide range of stakeholders both on the Company's activities in the areas discussed and on the disclosure of relevant information in the 2023 Report;
- sharing the results of the stakeholder survey conducted as part of the materiality assessment;

- presenting and discussing with a wide range of stakeholders the Company's vision and approach to Nornickel's social strategy, environmental management, and innovative projects for sustainable development.

## Programme

Item 1. **Addressing stakeholders.**

Item 2. **Results of stakeholder survey.**

Item 3. **Nornickel's social strategy.**

Item 4. **Nornickel's innovative projects for sustainable development.**

Item 5. **Environmental management: biodiversity conservation and the Sulphur Programme.**

<sup>1</sup> For more details, please see the press release on ESG events on [Nornickel's corporate website](#). For more details on stakeholder proposals, please see the [Definition of Material Topics](#) and [Stakeholder Recommendations](#) sections.

**Item 1. Addressing stakeholders.**

**Speaker:**

**Vladimir Zhukov,**

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

Mr Zhukov gave a retrospective review of non-financial reporting. As its first social report was published back in 2005, Nornickel is a Top 3 company with the longest history of sustainability reporting in Russia. To disclose high-quality, complete, and accurate information on sustainable development

in a report, which is, in fact, a data mart, the Company needs to invest some effort in this area. Nornickel has been doing it for a long time, which is confirmed by the annual growth of expenditures on projects related to the UN SDGs.

Vladimir Zhukov emphasised that the Company strives to comply not only with the Russian laws and regulator recommendations but also with international best practices: for example, the number of GRI indicators disclosed by the Company has almost doubled since the first report. In addition, there is a tightening of requirements

to the quality of non-financial disclosure: 2023 saw the issue of the first international IFRS standards – IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information and IFRS S2 Climate-related Disclosures. According to Mr Zhukov, the Company plans to pilot the disclosure of climate-related indicators under IFRS S2 in its 2023 Sustainability Report. People, nature, and innovations are the main and most relevant areas of the Company’s sustainable development.

**Item 2. Results of stakeholder survey.**

**Speaker:**

**Inessa Chernova,**

Head of Sustainability Reporting at MMC Norilsk Nickel.

Ms Chernova stressed the Company’s commitment to information transparency; its key tool is annual sustainability reporting compliant with national and international reporting standards, recommendations, stakeholder requests, and suggestions. In 2022, along with its flagship report, Nornickel published a number of thematic reports: they help expand and deepen the Company’s non-financial reporting practices. Nornickel’s anniversary report incorporated more requirements and recommendations

compared to previous reporting; it is planned to disclose indicators under Order of the Ministry of Economic Development of Russia No. 764 dated 1 November 2023 and pilot climate-related disclosures under IFRS S2.

Inessa Chernova spoke about the stages and results of the procedure for defining material topics, which serves to consider the input of external and internal stakeholders and publish the most up-to-date and relevant information. The 2023 survey showed a significant increase in the number of respondents, changes in the ranking of material topics (Top 3 – social aspect topics, increased score for certain topics)<sup>1</sup>, a broad stakeholder response (the Company received a high

score for its 2022 Report (4.7 points out of 5.0)), and proposals to improve disclosure practices<sup>2</sup>.

In conclusion, Ms Chernova noted that international and Russian experts highly appreciated the Company’s sustainability reports, which encouraged the development of environmental, social, and management practices and their sharing.

After the presentation, the participants discussed foreign rating agencies and cooperation prospects, as well as the reasons for the reprioritisation of material topics in 2023 and the 2023 materiality assessment procedure.

**Item 3. Nornickel's social strategy.**

**Speakers:**

**Larisa Zelkova,**

Senior Vice Presiden for HR, Social Policy, and Public Relations at MMC Norilsk Nickel,

**Andrey Grachev,**

Vice President for Federal and Regional Programmes at MMC Norilsk Nickel.

Larisa Zelkova presented four key areas of the Company’s Sustainable Social Development Strategy through 2030, which are related to Nornickel’s impact on society, social interests, and other areas: safety and working conditions, talent management and corporate culture, development of technologies and products that help foster technological and social progress, and involvement

in the lives of local communities and society at large. These areas were formulated based on the Company’s business priorities and key challenges facing Nornickel. They bring together well-known social programmes, projects, and corporate efforts, such as In Good Company programme for young professionals, the Norilsk renovation programme, a comprehensive programme to aid indigenous northern minorities, and more.

Andrey Grachev spoke about the Company’s policy on interaction with indigenous peoples and relevant achievements. Special attention is paid to the Free, Prior and Informed Consent (FPIC) process. In Tukhard, it saw more than 500 people taking part in four meetings. Tukhard’s case extends to the Company’s new Kolmozersk

project, which is unique for Nornickel: it is the first lithium deposit in Russia and the first mining project where the Company conducts FPIC prior to development. According to monitoring results, foreign colleagues are interested in the Company’s experience.

Following the presentations, there were additional discussions on the development of the HR brand, the re-hiring programme, the possibility of attracting various categories of individuals, including vulnerable groups, the Company’s creative industry development goals in the regions where it operates, the transformation of the corporate environment, and the expansion of the programme for interaction with indigenous peoples in the Taimyr Peninsula.

**Item 4. Nornickel's innovative projects for sustainable development.**

**Speakers:**

**Vitaly Busko,**

Vice President for Innovations at MMC Norilsk Nickel,

**Liliya Yafarova,**

Senior Researcher at the Hydrometallurgy Laboratory of the R&D Department, Project Director at the Project Management Department of Gipronickel Institute.

Mr Busko reported on four innovation areas in sustainable development and relevant projects: reduction of CO<sub>2</sub> emissions (natural and active mineralisation of rock with CO<sub>2</sub> absorption), minimisation of environmental impact (new technologies for mine and waste water treatment, re-use of slags

and tailings in backfill production), industrial safety (in-house development of exoskeletons, machine vision for monitoring occupational health and safety), new products accelerating the green transition using the Company’s metals (palladium and nickel), which are being developed jointly with Russian and international research institutes.

Liliya Yafarova presented the results of Gipronickel Institute’s work to create cathode materials for the future energy. The scientists analyse not only products that are currently in use but also promising compounds: three of them were created in 2023, and potential consumers are testing the products and have already given positive feedback. Ms Yafarova stressed that the technology is being developed in parallel with ways to dispose

of and recycle used batteries: the experts ran preliminary lab tests with high quality samples obtained, and were able to extract from used batteries the target cathode material, which can rival commercial products in terms of its properties. The project is implemented by young scientists holding a PhD and aged under 30. The lab created for them has become a competence centre. Ms Yafarova urged companies to support research efforts, as it will allow them to develop their own competences and become a talent foundry for the production segment.

The speakers answered questions about the criteria for ESG products, demand for such products, assessment of their impact, and contribution to the ESG agenda.

<sup>1</sup> For more details, please see the [Definition of Material Topics](#) appendix.  
<sup>2</sup> For more details, please see the [Stakeholder Recommendations](#) appendix.

**Item 5. Environmental management: biodiversity conservation and the Sulphur Programme.**

**Speaker:**

**Stanislav Seleznev,**

Vice President for Ecology and Industrial Safety at MMC Norilsk Nickel.

Mr Seleznev's presentation focused on three key areas of the Company's ESG agenda: biodiversity research, reduction of sulphur dioxide emissions, and occupational health and safety.

For two years, Norinickel, together with the Russian Academy of Sciences, has been conducting the Big Scientific Expedition, Russia's largest biodiversity survey to assess biodiversity changes in terms of impact on the regions where the Company operates. The expedition is underpinned by a scientific approach: experts developed a methodology for calculating an integral indicator of ecosystem health, confirmed the possibility of using molecular genetic analysis, including for rapid plant diagnostics, assessed and analysed the Company's impact on ecosystems; the research was expanded with studying the processes of heavy metal migration in soils. In 2023, the expedition results confirmed by the Russian Academy of Sciences were published on the Preserving Ecosystems<sup>1</sup> website (to be updated annually with relevant data and results of new projects).

Stanislav Seleznev presented the key results of the Sulphur Programme aimed at addressing atmospheric pollution

from the Company's operations. Since 2015, SO2 emissions at Kola Division have decreased by 90%, outperforming the target of an 85% reduction, and there are remediation processes that have started around the Company's sites. At Norilsk Division, the Sulphur Programme at Nadezhda Plant was launched in October 2023 – once the full capacity is reached, sulphur dioxide emissions are expected to go down by 45%. Thanks to the programme, Norilsk will no longer be on the list of Russia's dirtiest cities.

As regards occupational health and safety, the Company's focus is on accident investigation, corrective actions, and changes in employee training: the Cardinal Safety Rules have been revised, the motivation system has been changed (incentives for risk identification), and a project to train internal coaches has been created. The retrospective growth of fatality rates is due to a new approach to recording, classification, and investigation of accidents, which has increased the transparency and reliability of data provided. Mr Seleznev emphasised that the Company is committed to the strategic goal of zero fatalities, but it takes time to achieve it.

After his presentation, Stanislav Seleznev took questions from stakeholders on the independent expert review of the Sulphur Programme's environmental results, development of the permafrost monitoring system,

performance of the Centre for Monitoring Technical, Production, and Environmental Risks, and the Environmental Monitoring Centre.

The speakers' reports were followed by an open discussion where stakeholders could ask questions, provide comments and suggestions. In particular, additional discussions were held on investment project financing mechanisms, motivation for the Company's cooperation with Asia-Pacific countries, Norinickel's contribution to addressing the country's national and strategic objectives, and the Company's interaction with educational institutions.

The participants were invited to vote online and also to provide feedback via QR code:

- 98% of respondents noted that adhering to the sustainable development strategy is important both for maintaining the Company's image and for sustainability in the face of a rapidly changing world;
- 93% of respondents said that the climate agenda is fairly/extremely important;
- as open feedback, participants thanked the Company for its commitment to openness and transparency and various opportunities offered, and praised the organisation of the event.

**Stakeholder recommendations**

Recommendations	Company response
<b>From external stakeholders</b>	
Provide more details on cooperation with secondary vocational education institutions and participation in the Professionalitet federal project	Done. Disclosed in the <a href="#">Training Programmes</a> section
Provide more details on cooperation with schools, universities, and the Career Navigator project	Done. Disclosed in the <a href="#">Training Programmes</a> section
Make navigating the Report easier	Done
Provide information about the Company's goals and objectives as regards the Global Biodiversity Framework to 2030	Done. Disclosed in the <a href="#">Biodiversity</a> section
Disclose a detailed emissions reduction plan	To be done in the next reports
Provide more detailed information about the Company's contribution to the national and strategic objectives of Russia	Partially done. Disclosed in the <a href="#">Norinickel's Contribution to the UN SDGs and Russia's Strategic Priorities</a> section
<b>From internal stakeholders</b>	
Provide more details on safe operation of hydraulic structures	Done. Disclosed in the <a href="#">Tailings and Waste</a> section
Provide information about working with disabled persons	Partially done. Disclosed in the <a href="#">HR Management</a> and <a href="#">Social Policy</a> sections
Provide more details on interaction with regions of operation and effects of charitable and socially important events	Partially done. Disclosed in the <a href="#">Development of Local Communities</a> section
Provide information about the management of supplier and contractor requirements, control of environmental and social requirements set by Norinickel, and alignment of responsible supply chain activities with specific divisions	Done. Disclosed in the <a href="#">Supply Chain Responsibility</a> section and <a href="#">2023 Responsible Supply Chain Report</a>
Broader representation of social projects	Done. Disclosed in the <a href="#">Development of Local Communities</a> and <a href="#">Human Capital Development</a> sections
Provide information about employee wages by age and gender, career growth and career tracks	Done. Disclosed in the <a href="#">Incentives and Rewards</a> and <a href="#">Training Programmes</a> sections
Provide information about renewable energy sources by divisions	To be done in the next reports
Report on the use of alternative fuels in production	Done. Disclosed in the <a href="#">Energy Consumption and Efficiency</a> section

<sup>1</sup> <https://life.nornickel.com/>

# OPINION OF THE RSPP COUNCIL ON NON-FINANCIAL REPORTING



At the request of MMC Norilsk Nickel (the "Company"), the Council on Non-Financial Reporting, Indices and Sustainability Ratings of the Russian Union of Industrialists and Entrepreneurs (RSPP) (the "Council") reviewed the Company's 2023 Sustainability Report (the "Report").

The Company requested the RSPP to arrange for the public assurance of the Report, with the Council on Non-Financial Reporting providing an opinion on the materiality and completeness of the Report's information about the Company's operations from the perspective of the Social Charter of the Russian Business. The Charter sets out key principles of responsible business conduct aligned with those of the UN Global Compact, as well as domestic and international CSR and sustainability standards and guidelines.

The public assurance process took place from 12 April to 4 May 2024 in accordance with the Council's approved Procedure for Public Assurance of Corporate Non-Financial Reports. This Opinion was issued based on the assessment by the RSPP Expert Panel on Non-Financial Reporting, as well as the Report analysis and assessment by the RSPP Council on Non-Financial Reporting, Indices and Sustainability Ratings.

The Council members possess all the required competencies in corporate responsibility, sustainable development and non-financial reporting, comply with the ethical requirements for independence and impartiality, and provide their personal expert opinion rather than the opinion of organisations they represent.

The Report was assessed based on the below-listed criteria of information materiality and completeness.

Information is considered to be material if it reflects the company's efforts to implement the principles of responsible business conduct set out in the Social Charter of the Russian Business (see [www.rspp.ru](http://www.rspp.ru)).

Completeness implies that the Company provides a comprehensive overview of its operations, including the underlying values and strategic benchmarks, governance systems and structures, stakeholder relationship framework, accomplishments, key results, and performance indicators.

The procedure for the public assurance of the Report factors in the Company's application of international reporting frameworks;

this Opinion does not, however, purport to assess the Report's compliance with such international frameworks.

The Company is responsible for the information and statements provided in the Report. The accuracy of the Report's information is beyond the scope of the public assurance procedure.

This Opinion has been prepared for MMC Norilsk Nickel. The Company may use it for both corporate and stakeholder communication purposes by publishing the original version without any changes.

## CONCLUSIONS

Based on the review of the Report and the information publicly available on the Company's official website, and following a collective discussion of the results of the Report's independent assessment undertaken by the members of the RSPP Expert Panel on Non-Financial Reporting, the Council confirms as follows:

**Norilsk Nickel Group's 2023 Sustainability Report covers all the key areas of responsible business conduct in accordance with the principles set out in the Social Charter of the Russian Business, and provides sufficient information about the Company's operations in relation thereto.**

**The recommendations made by the RSPP Council following the public verification of the Norilsk Nickel Group's 2022 Report were incorporated into the 2023 Report. The Company included information on its approach to defining the scope of the Report, application of the Big Scientific Expedition results, results of monitoring ESG compliance across the supply chain, as well as a detailed description of the materiality assessment procedure conducted by the Company when preparing the Report.**

The Company's 2023 Report contains relevant information relating to the below-listed aspects of responsible business conduct:

**Economic freedom and responsibility:** The Report presents information on the key areas and results of the Company's operations, its position in the industry, and long-term global trends as regards the output and consumption of the Company's metal basket. The Report describes the 2023–2024 investment programme parameters, energy infrastructure modernisation plan, and strategic priorities regarding the use of technologies and

products. There is information on product quality assurance measures implemented as part of the Corporate Integrated Management System, as well as data on innovation and R&D activities. The Report outlines digital solutions to improve business processes, key areas of application and use of digital technology and AI. According to the Report, the Company maintains its strategic priorities in sustainable development in the scope of the Environmental and Climate Change Strategy through 2031 and the Sustainable Social Development Strategy through 2030. To that end, the Report features information on priorities, goals, KPIs, and main initiatives underlying both strategies. Norinickel intends to carry on with its major Sulphur Programme designed to reduce emissions of sulphur dioxide. The Report presents information on initiatives and programmes contributing to the achievement of the UN SDGs and Russia's national projects. In the Report, Norinickel also presents its corporate governance model and sustainability management system along with the Board of Directors' role in it. The Company discloses its risk management system, including relevant process automation accomplishments. The Report also sets out Norinickel's approaches, principles, and focus areas as regards corporate culture and ethics development and anti-corruption practices.

**Business partnerships:** The Report presents stakeholder engagement mechanisms and provides a stakeholder map with 2023 highlights while also listing corporate documents outlining the main principles and standards of stakeholder engagement.

**Shareholders and investors:** The Report discloses mechanisms and key events in investor engagement. The Company implements a strategy to engage with retail investors, including its own employees participating in the Digital Investor corporate programme. The Report also reflects Norinickel's goal to raise the number of retail investors along with their proportion in the Company's authorised capital.

**Employees:** The Report contains information on the HR management system, creation of new jobs as part of the Sulphur Programme implementation, employee development and training system, as well as social guarantees and incentives. The Company reports on the performance of its offices for labour relations, Norinickel Live Q&A session, and corporate dialogue sessions with the Company's top managers. It discloses the establishment of a youth ecosystem, development of corporate employee communities to share interests,

and the Corporate Volunteering Programme. The Report presents the results of corporate culture and employee engagement surveys. It contains information on the occupational health and safety management system within the Company and along the supply chain, measures to improve safety culture, implementation of digital controls, and injury prevention measures. The Company reports on its special assessment of working conditions, measures to prevent occupational diseases, and the Digital Medicine programme. The Report also includes data managing complaints and queries submitted via the Corporate Trust Line, along with guidelines for registering and reviewing queries.

**Government authorities:** The Report presents information on the Company's liaison with government authorities on implementing regional development plans, national projects, environmental stewardship, and other initiatives. Norinickel regularly interacts with tax authorities in the real-time mode through the tax monitoring system.

**Suppliers and contractors:** The Report contains information on the Company's efforts to build a responsible supply chain in line with the Responsible Sourcing Policy and Supplier Code of Conduct. The Report contains information on assessing suppliers for compliance with corporate requirements, including those related to human rights, OHS, and labour relations. The Report also states that the Company issued a separate Responsible Supply Chain Report. Consumers and customers: The Company shared information on customer satisfaction assessment, as well as control and analysis of its delivery against contractual obligations. The Report presents details of the Company's sales strategy that seeks to ensure uninterrupted supplies of products to customers. Business partners: The Report describes Norinickel's approach to cooperation with non-governmental institutions, non-profits, and R&D hubs, and presents information on the Company's joint projects and its participation in business and industry associations.

**Human rights:** The Report has a section dedicated to human rights, and the Company's principles and management approaches in this domain formalised in the Human Rights Policy and other by-laws. The Report states that the Company had prepared its 2023 Human Rights Report, emphasising the focus on labour rights and zero tolerance

towards discrimination. The Report discloses mechanisms and procedures for protecting employee interests, including trade union engagement. There is also information on social support for employees facing redundancy following mine mothballing, and employment of people with disabilities. The Company places a special focus on respecting the rights of indigenous peoples of the North. It maintains an open dialogue with them, including in terms of planned deposit development. The Company adopted the Indigenous Peoples' Rights Policy, which defines Norinickel's key commitments in this aspect. Norinickel states a zero tolerance approach to any violations of human rights across the supply chain.

**Environmental protection and climate change agenda:** The Report outlines the Company's Environmental and Climate Change Strategy through 2031, including its key focus areas and targets. It presents details on the Environmental Management System and informs about the launch of the Sulphur Programme at Nadezhda Metallurgical Plant. Key environmental performance indicators of the Company and their evolution are disclosed. The environmental management structure is presented, including the role of the Sustainable Development and Climate Change Committee of the Board of Directors. Key environmental management regulations are specified. The Report highlights successful completion of the latest surveillance audit, which reaffirmed compliance of Norinickel's corporate integrated environmental management system with ISO 14001:2015. The Report details the innovations the Company has adopted to reduce its environmental footprint. It outlines the principles and management systems in place for the use of water and land resources. It provides information on the updated Tailings Management Policy of MMC Norilsk Nickel and describes the tailings safety monitoring and risk management system. The Report states there is no water scarcity across the Company's footprint, highlighting that its focus is on ensuring wastewater quality compliance. The impact of transport on water bodies is characterised. The Report outlines the Clean Norilsk programme to clean up and revamp industrial territories in Norilsk. It provides details on Norinickel's contribution to the work of the Arctic and biodiversity conservation team of Rosprirodnadzor's R&D Council. The Report also covers biodiversity impact management, encompassing value chain, life cycle stages, etc. It cites the completion of the second season of the Big Scientific Expedition used to refine the methodology for calculating

an integral indicator of ecosystem health across the Company's footprint. The progress of the energy infrastructure modernisation through 2030 is presented, including the most essential projects to improve equipment reliability, boost energy efficiency, and increase production output. Energy generation and consumption indicators are also covered in the Report. The Report highlights the Company's consistent efforts to leverage more cost-efficient and green energy sources, as evidenced by the increased share of renewable energy consumption in 2023. The Report outlines the Company's climate strategy and approaches to climate risk management and informs about the release of the Company's standalone Climate Change Report. The Report reviews the resilience of the Company's product portfolio under three global economic and climate change scenarios and discloses the carbon footprint of its products, as well as the approved Innovation Strategy, which provides for the development of new products. The Report also provides details about a partnership project to build small-capacity nuclear power plants in permafrost areas. Key outcomes of the corporate climate agenda are presented, along with data on greenhouse gas emissions.

**Contribution to the development of local communities:** The Report outlines the Company's contribution to social and economic development of local communities across its footprint in line with the Sustainable Social Development Strategy through 2030. This includes the Company's role in regional economic development through tax payments, jobs, and support for local suppliers. The Report reviews the progress of a comprehensive plan to renovate the Norilsk Industrial District and the city of Norilsk, as well as the testing of digital construction systems at renovation sites. The Report also provides an overview of the Company's tourism investment projects and its contribution to the Tourism and Hospitality national project. It presents data on the piloting of an air quality monitoring and forecasting system in Norilsk, Monchegorsk, Zapolyarny, and Nickel. The Report provides an overview of the Company's focus areas and budget allocation for the development of local communities, including charitable initiatives, sponsorship, infrastructure development, and other forms of expenditures. The Report also details the Company's support of initiatives and events organised by territorial development institutions, including the Urban Development Agency, and outlines key programmes aimed at improving the well-being of local communities.

## Final provisions

Overall, the Report testifies to the Company's commitment to responsible business practices, detailing Norinickel Group's sustainable development strategy, achievements, and the governance systems in place to support its corporate social responsibility efforts. It highlights the Company's contribution to addressing public well-being challenges and provides a detailed overview of its progress in helping achieve UN SDGs by 2030 and implement Russia's national projects, disclosing a significant number of economic, social and environmental performance indicators. When making a list of material topics, the Company took into account feedback from stakeholders. The Report also cites the publication of standalone reports focused on Norinickel's management approaches and practices in the areas of human rights, climate change, and responsible supply chain.

The Report has been prepared in compliance with the GRI Standards (2021). Among others, the Report relies on the following documents: the UN Global Compact, SASB Metals & Mining Sustainability Accounting Standard (2021), UNCTAD Guidance on core indicators for entity reporting on contribution towards implementation of the UN Sustainable Development Goals, recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), RSPP Reference Performance Indicators, AccountAbility Standards AA1000SES (2015) and AA1000AP (2018). In preparing the Report, the Company also followed the Methodological Recommendations for Sustainability Reporting approved by the Ministry of Economic Development of Russia.

The 2023 Report is the Company's 20th non-financial report, which demonstrates its determination to consistently develop reporting processes and commitment to openness and transparency.

The Company uses various forms of independent assessment and confirmation of disclosed information (professional audit and public assurance). This reflects its commitment to maintaining the high quality of disclosures.

## RECOMMENDATIONS

While acknowledging the Report's strengths, the Council calls attention to some substantial aspects of disclosures' materiality and completeness, which should be addressed in the future reporting cycles.

The Council notes that the recommendations made following the review of the previous reports remain valid and good for use going forward.

The Report outlines the Company's commitment to sustainable use of energy resources and provides data on the energy savings achieved. It is recommended to expand the scope of disclosure on the specific efforts that have led to the reported energy and fuel savings, as well as to provide more details on the methodology used for the measurement of quantitative performance indicators.

The Report highlights the Company's active investment in improving energy efficiency and expanding the use of renewable energy sources. It would be valuable to provide more comprehensive disclosure on the use of renewable energy sources by division and RES type.

The Report indicates that specific environmental and climate impact metrics are calculated using a financial indicator in the denominator. It is recommended that future reports provide more detailed commentary on changes in these specific indicators and the drivers behind them.

Furthermore, it is recommended that future reports place special emphasis on providing detailed commentary on these indicators, as this significantly affects the quality of the disclosures and their perception by stakeholders.

The Report highlights the Company's contribution to the Labour Productivity national project, but the indicator itself is not included in disclosures. However, this indicator is important as it is used, among other things, in an independent assessment of companies' performance based on the review of their public reports.

The Report highlights the Company's extensive efforts to develop local communities, including long-term social projects and significant social investments. To further strengthen the disclosure, it is recommended that future reports include information on the Company's approach to evaluating the effectiveness of these social investments, as well as the results of such evaluations.

The Report outlines the Company's strong commitment to supporting people with disabilities and special needs, including through their employment. To further strengthen the disclosure, it is recommended that future reports provide more detailed information on specific internal initiatives focused on creating an accessible environment and employment opportunities for these population groups, including data on the number of employees with disabilities and the work they perform.

It is recommended that future reports include feedback from representatives of the Company's key stakeholder groups, beyond just employees, regarding social, economic and environmental impacts of the Company's operations, as well as the quality of their communication with the Company on these matters.

The Report references various internal regulations that govern different aspects of the Company's operations. To enhance information disclosure, it is recommended that relevant links to these internal regulations are included in future reports.

The RSPP Council on Non-Financial Reporting, Indices and Sustainability Ratings hereby takes a positive view of this Report, supports the Company's commitment to responsible business practices, notes consistency in developing the reporting process, and confirms that Norilsk Nickel Group's 2023 Sustainability Report has passed the public assurance procedure.

Chairman of the Council on Non-Financial Reporting, Indices and Sustainability Ratings

# INDEPENDENT ASSURANCE REPORT

GRI 2-5

**JSC "Kept"**  
 Naberezhnaya Tower Complex, Block C  
 10 Presnenskaya Naberezhnaya  
 Moscow, Russia 123112  
 Telephone +7 (495) 937 4477  
 Fax +7 (495) 937 4499



## Independent Audit Firm's Limited Assurance Report on the Information in the Sustainability Report of PJSC "Mining and Metallurgical Company "Norilsk Nickel" for 2023

To the Shareholders and Management of PJSC "Mining and Metallurgical Company "Norilsk Nickel"

### Introduction

We were engaged by the Management of PJSC "Mining and Metallurgical Company "Norilsk Nickel" ("the Management") to issue a report on certain information in the Sustainability Report of PJSC "Mining and Metallurgical Company "Norilsk Nickel" ("the Group") for 2023 ("the Report") which includes a limited assurance conclusion on whether such information in the Report is prepared and presented, in all material respects, based on applicable criteria (as set out in section "Criteria Used" of this report) and is free from material misstatement.

Our conclusion covers only the following indicators and information ("the Information in the Report"):

- the information disclosed in the Report in accordance with the recommendations of TCFD<sup>1</sup> in the Appendix to the Report "TCFD Disclosures" and marked "Assured" in the column "Assured by the auditor";
- GRI<sup>2</sup> indicators included in the Report in the Appendix to the Report "GRI Content Index" and marked "Assured" in the column "Assured by the auditor".

Our conclusion does not extend to any other indicators or information included or disclosed in the Report.

### Management's Responsibilities

Management is responsible for preparing and presenting the Information in the Report that is free from material misstatement in accordance with the applicable criteria (set out below in section "Criteria used" of this report) and for the information contained therein.

This responsibility includes: designing, implementing and maintaining internal control system relevant to the preparation and presentation of the Information in the Report that is free from material misstatement whether due to fraud or error. It also includes determining the Group's objectives in respect of sustainable development performance and reporting, including the identification of key stakeholders groups and their material issues; selecting the applicable criteria (set out below in section "Criteria used" of this report); preventing and detecting fraud; identifying and ensuring that the Group complies with laws and regulations applicable to its activities; selecting and applying appropriate policies; making judgments and estimates that are reasonable in the circumstances; maintaining adequate records in relation to the information included in the Report; ensuring that staff involved in the preparation of the Report is properly trained; information systems are properly updated and that any changes in the reporting system encompass all key business units.

<sup>1</sup> Information disclosed in accordance with the recommendations of the Task Force on Climate-Related Financial Disclosure (TCFD).

<sup>2</sup> Indicators prepared in accordance with Global Reporting Initiative (GRI) Sustainability Reporting Standards.

Engaging entity: PJSC "Mining and Metallurgical Company "Norilsk Nickel"

Registration number in the United State Register of Legal Entities № 1028400000298

Audit firm: JSC "Kept"

Principal registration number of the entry in the Register of Auditors and Audit Organizations No. 12006020351

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### Our Responsibilities

Our responsibility is to perform procedures to obtain evidence in respect of the Information in the Report and to report thereon in the form of a limited assurance conclusion regarding whether the Information in the Report is prepared, in all material respects, in accordance with applicable criteria and is free from material misstatement based on the evidence obtained.

We conducted our engagement in accordance with International Standard on Assurance Engagements 3000 (revised) *Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* (ISAE 3000) issued by the International Auditing and Assurance Standards Board.

ISAE 3000 requires that we plan and perform our procedures to obtain a limited level of assurance about whether the Information in the Report is prepared and presented, in all material respects, based on applicable criteria (set out below in section "Criteria used" of this report) and is free from material misstatement.

### Our Independence and Quality Management

We have complied with the independence and ethical requirements established by the *Russian Rules on Independence of Auditors and Audit Firms* and the *Russian Code of Professional Ethics for Auditors*, and by the *International Code of Ethics for Professional Accountants* (including International Independence Standards) issued by the International Ethics Standards Board for Accountants, which are based on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behavior.

We apply International Standard on Quality Management 1, which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

### Procedures Performed

The procedures selected, and our determination of the nature, timing and extent of these procedures, depend on our judgment, including the assessment of risk of material misstatement of the Information in the Report, whether due to fraud or error, our understanding of the Group's activities, as well as other engagement circumstances.

In making these risk assessments, we considered internal control system relevant to the Group's preparation and presentation of the Information in the Report in order to design procedures that are appropriate in the circumstances, but not for the purposes of forming a conclusion as to the effectiveness of the Group's internal control.

Our engagement also included: assessing the appropriateness of the subject matter, the suitability of the criteria (set out below in section "Criteria used" of this report) used by Management in preparing and presenting the Information in the Report in the circumstances of the engagement; evaluating the appropriateness of the methods, policies and procedures used in the preparation of the Information in the Report and the reasonableness of estimates made by Management.

The procedures we developed based on the performed risk assessment are a combination of inspections, confirmations, recalculations, analytical procedures and inquiries.

Our procedures included, but were not limited to, the following:

- inspection of the processes used by PJSC "Mining and Metallurgical Company "Norilsk Nickel" to identify topics and issues material to the Group's key stakeholder groups, with the purpose of understanding such processes in the Group, as well as analysis of information from open sources on topics and issues material to key stakeholder groups of other organizations in the industry, with the purpose of determining the level of completeness of disclosure of such topics and issues in the Report;

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- interviews with Management representatives and officers at the head office regarding the sustainable development strategy and policies regulating material issues in areas of importance for the Group, stage of implementation of such policies, and procedures for collecting information on sustainable development;
- interviews with employees of the head office responsible for providing the information for the Report;
- conducting procedures at the level of the following companies of the Group and a division:
  - Head office (PJSC "Mining and Metallurgical Company "Norilsk Nickel")
  - Polar division (PJSC "Mining and Metallurgical Company "Norilsk Nickel")
  - Medvezhy Ruchey LLC
  - JSC Kola MMC
  - GRK Bystrinskoye LLC
  - JSC NTEC
  - Norilsknickelremont LLC
  - Norilskij Obespechivayushchij Kompleks LLC
  - Norinickel Sputnik LLC

which were selected based on risk analysis using qualitative and quantitative criteria;

- comparing the Information in the Report with data from other sources to determine its completeness, accuracy and consistency;
- assessing the completeness of qualitative and quantitative information on sustainable development against the criteria used (set out below in section "Criteria used" of this report);
- reading and analyzing information on sustainable development included in the Report to determine whether it is in line with our understanding and knowledge of the Group's sustainable development activity;
- recalculation of quantitative data that are part of the Information in the Report and inspection of underlying documentation.

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

As part of this engagement, we have not performed any procedures by way of audit or review of the Information in the Report nor of the underlying records or other sources from which the Information in the Report was extracted.

**Criteria Used**

The applicable criteria comprise relevant requirements and recommendations on the methodology for preparing the Report, as well as necessary reference information contained in the following documents:

- Recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD)<sup>3</sup>;
- Global Reporting Initiative Sustainability Reporting Standards (GRI)<sup>4</sup>;
- Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Accounting and Reporting Standard<sup>5</sup>;
- 2006 IPCC Guidelines for National Greenhouse Gas Inventories<sup>6</sup>.

<sup>3</sup> <https://www.fsb-tcfid.org/recommendations/>  
<sup>4</sup> <https://www.globalreporting.org/standards>  
<sup>5</sup> <https://ghgprotocol.org/corporate-value-chain-scope-3-standard>  
<sup>6</sup> <https://www.ipcc-nggip.iges.or.jp/public/2006gl/russian/index.html>

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**Inherent Limitations**

Greenhouse Gas quantification is subject to inherent uncertainty because of the incomplete scientific knowledge used to determine emission factors of different gases.

**Conclusion**

Our conclusion has been formed on the basis of, and is subject to, the matters outlined in this report. We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Based on the procedures performed, described in this report, nothing has come to our attention that causes us to believe that the Information in the Report is not prepared or not presented, in all material respects, in accordance with the applicable criteria (set out in section "Criteria used" of this report) or is not free from material misstatement.



Velichko Natalia Nikolaevna  
 Partner, JSC «Kept»  
 Power of attorney No. 375/22 as of 1 July 2022  
 Moscow, Russia  
 22 May 2024

# DISCLAIMER

The information contained herein relies on the data available to MMC Norilsk Nickel (the “Company”) as at the date of this 2023 Sustainability Report (the “Report”). After this Report was prepared, the Company’s operations as well as forecasts and overview of the current situation presented in the Report may have been affected by external or other factors, including the escalation of the geopolitical conflict in Ukraine, sanctions imposed by the United States, the European Union, the United Kingdom and other nations against the Russian Federation, Russian individuals and legal entities, Russian Federation’s response to sanctions, economic and other measures introduced to maintain the economic and financial stability of the Russian Federation, and other factors beyond the Company’s control. In particular, the United States, the European Union, the United Kingdom, and other nations have imposed export controls against the Russian Federation that adversely affect, among other things, supply of industrial equipment to the Russian Federation. The impossibility to purchase and deliver equipment to Russia may limit the development of the Company’s production capacities.

The Report discloses the Company’s short-, medium-, and long-term goals and plans. All plans and intentions outlined in this Sustainability Report are provisional and subject, among other things, to a number of economic, political and legal factors, including the factors mentioned above, beyond Nornickel’s control. Forward-looking statements are subject to risks and uncertainties as they refer to events and depend on circumstances that may or may not occur in the future. Forward-looking statements are not guarantees of the Company’s future operational and financial performance, and actual results of the Company’s operations, its financial position, liquidity, prospects, growth, strategy, and the development of the industry in which the Company operates may differ materially from those expressed or implied by the forward-looking statements contained in this Report. The Company hereby disclaims any liability for any loss resulting from the use of this Report, and assumes no obligation to update any forward-looking statements contained herein.

Information about the market share and other statements regarding the industry in which MMC Norilsk Nickel operates,

as well as the Company’s position relative to its competitors are based on publicly available information published by other metals and mining companies or obtained from trade and business organisations and associations. Such data and statements have not been verified, and the financial and operating performance metrics of the Company’s competitors used to assess and compare positions may have been calculated differently from the method used by MMC Norilsk Nickel.

This Report is not part of a securities advertisement, an offer or invitation to sell, issue or offer the right to sell or subscribe for MMC Norilsk Nickel shares and other securities.

Any and all logos and trademarks used in this Report are the property of their immediate owners, and use thereof in this Report should not be construed as a promotion or advertisement for those owners’ goods or services.

# CONTACTS

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## Head Office

15, 1st Krasnogvardeysky Drive, Moscow, 123100, Russia

Phone: +7 495 787 7667

Email: [gmk@nornik.ru](mailto:gmk@nornik.ru)

## Sustainable Development Department

**Svetlana Ivchenko**  
Head of Department

Phone: +7 495 797 8250

Email: [social\\_report@nornik.ru](mailto:social_report@nornik.ru)

## Public Relations Department

**Tatyana Smirnova**  
Head of Public Relations

Phone: +7 495 785 5800

Email: [pr@nornik.ru](mailto:pr@nornik.ru)

## Nornickel on social media

→ [vk.com/nornickel\\_official](https://vk.com/nornickel_official)

→ [t.me/nornickel\\_official](https://t.me/nornickel_official)

→ [ok.ru/nornickel](https://ok.ru/nornickel)

→ [youtube.com/user/NornikOfficial](https://youtube.com/user/NornikOfficial)

## Norilsk through the eyes of its residents

→ [www.norilskfilm.com](http://www.norilskfilm.com)

## Corporate website

→ <https://www.nornickel.com/>