

Appendices



Reporting boundaries

(GRI 2-2)

Nornickel has established a data collection system that enables aggregating data across the Group's Business Unit¹ on the Company's most significant sustainability impacts. The boundaries of information consolidation as part of GRI disclosure in the Report may vary and depend on whether a particular entity has economic, environmental, and social impacts. Any exceptions from the boundaries of specific indicators, including changes for prior reporting periods, are invariably explained either directly in the text of the Report or in footnotes.

The criteria for including an entity in the scope of data collection depend on the specific indicator and are set out in the Company's internal documents.

Examples of criteria for economic and production indicators include mining, ore concentration, metals production, inclusion of an entity in the consolidated financial statements; for environmental indicators – completion of statutory statistical reporting forms; for personnel-related indicators – the entity's average headcount, etc.

The reporting boundaries include data from the Company's Russian business units, whose specific names are not disclosed in the text of the Report due to the current geopolitical situation. Currently, the ability to collect, independently verify, and disclose information on the Company's Foreign Business Units is limited. The Group's only significant foreign production entity, which makes part of the Polar Division, 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 2024, the Company did not carry out any major mergers or acquisitions that would have a substantial impact on the reporting boundaries. No significant changes from prior periods in terms of scope, boundaries, or measurement methods applied in this Report were recorded.



¹ In total, the Nornickel Group consists of more than 100 Russian and foreign entities.

Reporting boundaries for material topics

Legend

| | | | | | |
|---|--|---|--|---|--|
| All assets of the Subgroup are included | | Assets of the Subgroup with the most significant impacts are included | | Entities of the Subgroup are not included | |
|---|--|---|--|---|--|

| Material topics | GRI disclosures | Polar Division ² | Trans-Baikal Division | Energy Division | Sales Division ² | Head Office | Other Group enterprises |
|--|---------------------------|-----------------------------|-----------------------|-----------------|-----------------------------|-------------|-------------------------|
| 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 | | | | | | |
| | 404-3 | | | | | | |
| Contribution to the development of local communities | 201-1 | | | | | | |
| | 203-1, 203-2 | | | | | | |
| | 207-1, 207-2, 207-3 | | | | | | |
| Contribution to the development of national industry through import substitution | - | | | | | | |
| Emissions | 305-7 | | | | | | |
| Innovation projects pursuing sustainable development goals | - | | | | | | |
| Waste management | 306-1-306-5 | | | | | | |
| Climate change | 201-2 | | | | | | |
| | 302-1, 302-3, 302-4 | | | | | | |
| | 305-1-305-5 | | | | | | |
| 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 | | | | | | |
| Information security | - | | | | | | |

² Excluding Foreign Business Units.

| Material topics | GRI disclosures | Polar Division ¹ | Trans-Baikal Division | Energy Division | Sales Division ¹ | Head Office | Other Group enterprises |
|--|----------------------------|-----------------------------|-----------------------|-----------------|-----------------------------|-------------|-------------------------|
| Industrial environmental safety of production facilities (including tailings storage facilities) | - | 🟢 | 🟢 | 🟡 | 🟢 | 🟠 | 🟢 |
| Responsible exploration and land rehabilitation | - | 🟢 | 🟢 | 🟠 | 🟠 | 🟠 | 🟢 |
| Impact of transport on water bodies | - | 🟠 | 🟠 | 🟠 | 🟠 | 🟠 | 🟢 |
| Responsible supply chain | 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 small-numbered peoples) | 401-3 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 |
| | 402-1 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 |
| | 405-1 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 |
| | 406-1 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 |
| | 407-1 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 |
| | 408-1 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 |
| | 409-1 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 |
| | 410-1 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 |
| 411-1 | 🟢 | 🟠 | 🟢 | 🟠 | 🟡 | 🟢 | |
| 413-2 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 | 🟡 | |

Determining material topics

(GRI 3-1, 3-2)

In line with GRI Standards, Nornickel conducts an annual comprehensive assessment of sustainability impacts² informed by stakeholder engagement. In 2024, the Company implemented a relevant five-stage procedure.

Stage 1. Identifying impacts

A list of actual and potential impacts was drawn up. This list includes 30 impacts, which:

- were recognised as significant (21 impacts) and non-significant (six impacts)
- were identified in the reporting year based on an analysis of the Company's business context³ (three new impacts).

Result: a list of **30** actual and potential impacts of the Company

Stage 2. Assessing impacts

To assess the impacts, we ran an online survey, engaging a wide range of internal and external stakeholders. Respondents were asked either to:

a) confirm the relevance of last year's average assessments based on key parameters recommended by the GRI Standards, as previously collected from respondents during the preparation of the [2023 Report](#)

or

b) adjust the assessment if, in 2024, there were changes and the significance of impacts either increased or decreased, i.e. rate potential and actual impacts on a scale from 0 to 5, based on the parameters recommended by the GRI Standards:

Likelihood/frequency of impact

Severity of impact (including its irreversibility, which was rated on a yes/no scale)

Scale (scope) of impact

Additionally, respondents were given the opportunity to evaluate the quality of disclosure of material sustainability topics in the [2023 Report](#) and to provide suggestions on topics of particular interest. This Report reflects most of the comments.

Result: **554** questionnaires with impact assessments completed by stakeholders⁴ (+53% y-o-y)

Non-identifiable, partially completed, and improperly completed questionnaires were excluded from the analysis.



¹ Excluding Foreign Business Units.

² Impact is defined as the effect that the Nornickel Group has or may have on the economy, environment, or people, including on human rights.

³ Including core activities, business relationships, and sustainability context.

⁴ 29% external stakeholders, 71% internal stakeholders.

Stage 3. Making a prioritised list of topics

Average scores were calculated for all impacts and parameters, and the severity of impacts was determined.¹

All impacts were grouped into 19 topics reflected in a matrix, which was plotted on the Severity of Impact and Likelihood/ Regularity of Impact axes.

To establish the significance boundary, a cut-off value of 5.0 was set for the sum of coordinate values (rounded) or 50% of the maximum possible score. The Report includes information on topics below the materiality threshold, in line with stakeholder

needs as well as sustainability standards and recommendations. For immaterial topics, incomplete disclosure of GRI indicators is allowed.

Result: a list and matrix of 19 topics to be discussed with stakeholders in an open dialogue

Stage 4. Engaging in dialogue with stakeholders

The survey results, including a prioritised list of material topics, were presented to stakeholders in a dialogue held on 29 January 2025 in a mixed format (offline with a live webcast). Participants provided expert commentary and recommendations on the overall content of the Report as well as the disclosure of specific topics.

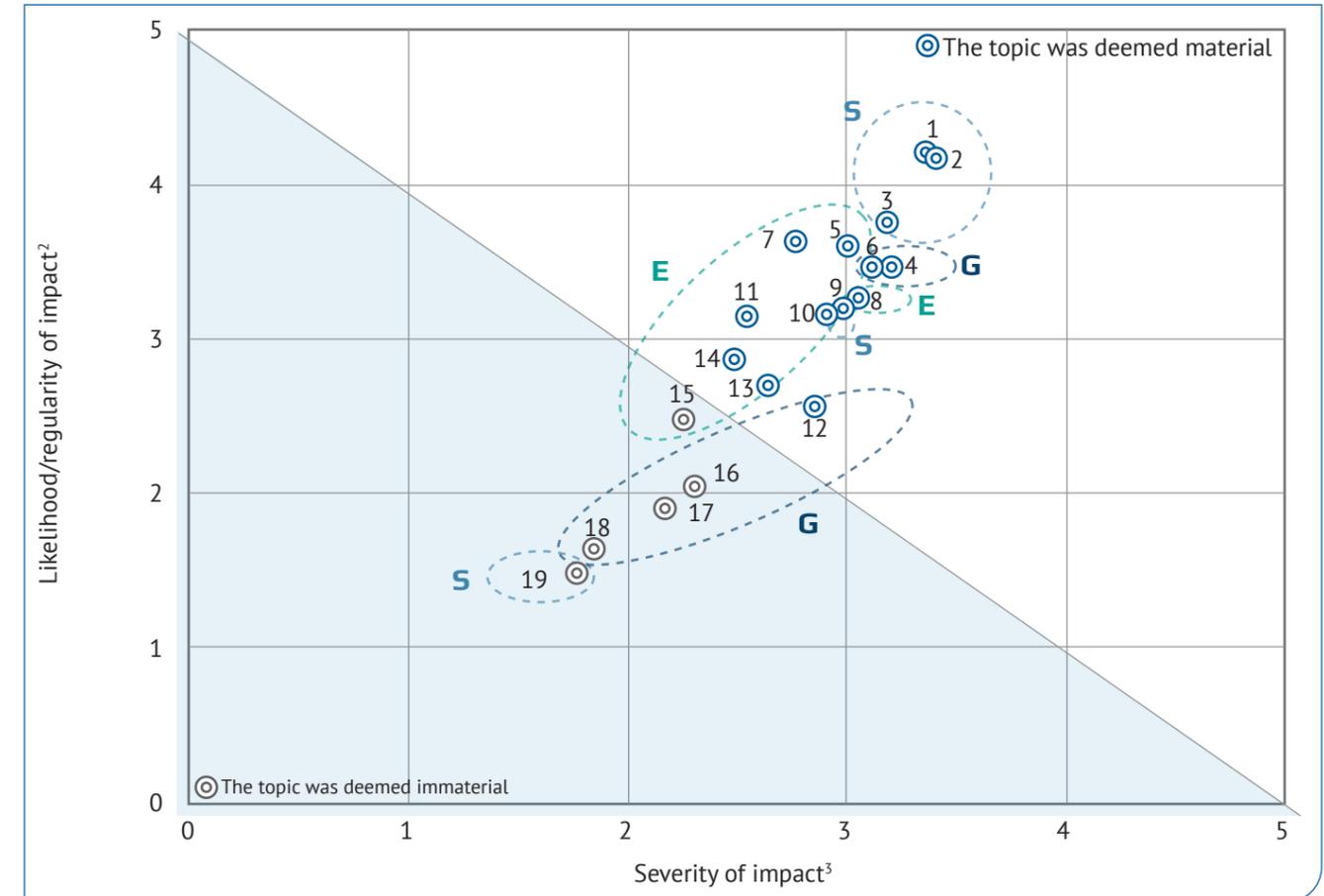
Result: a list of stakeholder recommendations for the Report

Stage 5. Finalising the list of material topics

A final materiality matrix was developed based on the stakeholder survey results, analysis of respondents' opinions, and a public discussion of key aspects of the Company's sustainable development.

Result: a final matrix with 14 material topics

Materiality matrix



Prioritised list of topics and associated impacts⁴

| No. ⁵ | 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 | Payment of taxes to budgets of various levels The Company's charitable activities targeting local communities (including indigenous minorities) and non-profit organisations to support sustainable development Development of housing, energy, and other infrastructure in the regions of operation Support for entrepreneurship in the regions of operation |

² On a scale from 0 to 5, where 0 means no impact and 5 means the impact is ongoing.

³ The average value for the severity of impact (assessed on a scale from 0 to 5, where 0 means no effect and 5 – critical effect) and the scale and scope of impacts (assessed on a scale from 0 to 5, where 0 means no impact and 5 – international scale).

⁴ Following the prioritisation, the first 14 topics were found to be material.

⁵ Turquoise indicates an environmental topic; light blue, a social topic; and dark blue, a management topic.

¹ The average score for impact severity based on the irreversibility factor and impact scale (scope).

| No. ⁵ | Topic wording | Sustainability impacts |
|------------------|--|---|
| 4 | Contribution to the development of national industry through import substitution | Contribution to the development of the national manufacturing sector through import substitution |
| 5 | Emissions | Emissions of sulphur dioxide and other pollutants |
| 6 | Innovation projects pursuing sustainable development goals | Innovation projects pursuing sustainable development goals |
| 7 | Waste management | Generation of industrial waste from operations |
| 8 | Climate change | Greenhouse gas emissions |
| | | Development of a climate change monitoring system |
| | | Metals production needed to combat climate change |
| | | Impacts related to self-generation, including renewable |
| 9 | Health and safety | Changes in demand for the Company's products due to the low-carbon transition |
| | | Incidents resulting in an employee injury or fatality A Company employee contracting an occupational disease |
| 10 | Biodiversity | Biodiversity across the Company's footprint |
| 11 | Water consumption and wastewater discharge | Wastewater discharge to water bodies |
| | | Water withdrawal from water bodies |
| 12 | Information security | Information security incidents at critical information infrastructure facilities |
| 13 | Industrial environmental safety of production facilities (including tailings storage facilities) | Incidents at hydraulic structures |
| | | Incidents causing negative environmental impacts and destruction of operating facilities |
| 14 | Responsible exploration and land rehabilitation | Land disturbance |
| 15 | Impact of transport on water bodies | Pollution of water bodies by sea and river transport |
| 16 | Responsible supply chain | Violation of sustainability principles in the supply chain |
| 17 | Corporate governance and risk management | Inadequate corporate governance and risk management leading to adverse outcomes |
| 18 | Anti-corruption and business ethics | Incidents of corruption and breach of business ethics |
| 19 | Respect for human rights (including those of indigenous minorities) | Unlawful actions against a Company employee or contractor, including discrimination, child labour, or forced labour |
| | | Violation of rights of local communities across the Company's footprint, including members of indigenous minorities |

Conclusions derived from the prioritised list of material topics for 2024:

- As in 2023, Nor Nickel's HR and social policy lead the ranking, demonstrating the continued demand for and relevance of the Company's programmes and initiatives for employees and local communities
- Environmental topics dominate the ranking by number, with a growing emphasis on areas such as pollutant emissions and waste management. This trend may be attributed to the active phase of the Sulphur Project, the Clean Norilsk initiative, and the launch of environmental monitoring of industrial emissions in Norilsk

- A new material topic was identified in the reporting year: information security. Its inclusion on the list, along with respondents' interest in the topic, may be attributed to a rise in cyber attacks, potential threats of information leaks and theft, and the growing need to protect the Company's infrastructure and data from such incidents
- The list of immaterial topics did not change year-on-year

Description of sustainability impacts

For a description of [impacts related to material topics](#), please see [Nor Nickel's 2022 Sustainability Report](#)¹. Below is a description of impacts identified in 2024, based on an analysis of the Company's current risk register, the risks outlined in the 2023 Report, and SASB Metal & Mining topics:

- Impacts related to the development of self-generation, including renewable (the Company's mid-term plans and ongoing measures include the upgrade of the energy infrastructure enabling adaptation to physical risks of climate change and better reliability of production assets and energy efficiency across the Company's footprint overall)
- Changes in the demand for the Company's products due to the low-carbon transition (one of the key drivers of Nor Nickel's long-term strategy is the growing demand for the Company's metals to develop a low-carbon economy).

The very fact of supplying green metals to the market means that the Company is actively contributing to the global transition to cleaner modes of transport and renewable energy. The Sustainable Palladium baseline scenario envisages growing consumption of nickel, copper, and platinum and expects palladium demand to remain at its current level

- Information security incidents at critical information infrastructure facilities (Nor Nickel operates an information security management system compliant with ISO/IEC 27001. In cooperation with strategic partners, the Company implements basic and follow-up measures to protect its technological infrastructure, data assets and employee personal data; conducts information security audits; provides training to employees on information security requirements; and places emphasis on fostering an overall information security culture, all of which contribute to reducing risks in this area).



¹ Some of the impact descriptions were rephrased as part of the 2024 stakeholder survey; however, their meanings remain unchanged and are consistent with the data presented in the [2022 Report](#) (pp. 310–312).

GRI content index

Nornickel has prepared this Report in accordance with the GRI Standards for the period from 1 January 2024 to 31 December 2024.

| GRI Standards 2021 disclosure number | Disclosure | Page/Link | Assured by the auditor | Omissions | Comments |
|--|---|--|------------------------|-----------|---|
| GRI 1: Foundation 2021 | | | | | |
| GRI 2: General Disclosures 2021 | | | | | |
| 1. The organisation and its reporting practices | | | | | |
| 2-1 | Organisational details | 2, 16 | Assured | | Nature of ownership – private |
| 2-2 | Entities included in the organisation's sustainability reporting | 298 | Assured | | <p>There were no material changes to the list of entities included in the boundaries of this Report compared to the list of entities included in Nornickel's 2023 Sustainability Report and the Norilsk Nickel Group's consolidated financial statements for 2023. Section 15 of the Notes to the Consolidated Financial Statements for 2023 discloses a list of the Company's principal subsidiaries.</p> <p>In 2024, five new entities joined the Group that were not engaged in active operational or investment activities and had no material impact on the Group's sustainability performance. In addition, there were other changes that did not affect the list of principal subsidiaries disclosed in 2023</p> |
| 2-3 | Reporting period, frequency, and contact point | 2, 388 | Assured | | <p>Financial and sustainability reporting is prepared annually for the calendar year.</p> <p>The date of this Report is 26 May 2025</p> |
| 2-4 | Restatements of information | 2, 137, 222 | Assured | | Compared to 2023, the Company revised its methodology for calculating and presenting information under GRI Disclosure 203-1: Infrastructure investments and services supported. For more details on these changes, please see p. 137 . Information is disclosed by division (where applicable) |
| 2-5 | External assurance | 2, 383 | Assured | | |
| 2. Activities and workers | | | | | |
| 2-6 | Activities, value chain, and other business relationships | 16, 37, 264 | 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 | 70, 337 | Assured | | |
| 2-8 | Workers who are not employees | 337 | Assured | | <p>The relations with such workers are mainly formalised through independent contractor agreements.</p> <p>Such agreements are typically made for temporary work, with no prevailing type of activity specified. There are no significant fluctuations in hiring within the reporting periods, while changes between reporting periods may be due to an increase in the number of full-time employees (as certain functions are insourced)</p> |
| 3. Governance | | | | | |
| 2-9 | Governance structure and composition | 32, 69, 111, 211, 232 | Assured | | <p>Information on the tenure of Board members and their skills is disclosed in Nornickel's 2024 Annual Report. Members of the Board of Directors also serve on Board committees.</p> <p>One Board member holds the position of the First Vice President – Head of Corporate Governance, Asset Management, and Legal Affairs, while another serves as the First Vice President – Chief Financial Officer. The other members of the Board of Directors do not hold any significant positions within the Company</p> |
| 2-10 | Nomination and selection of the highest governance body | 232 | Assured | | Members of the Board of Directors also serve on Board committees |
| 2-11 | Chairman of the Board of Directors | – | 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 | 32, 69, 111, 179, 211, 232, 234 | Assured | | |
| 2-13 | Delegation of responsibility for managing impacts | 32, 69, 111, 179, 211, 232, 234, 236 | Assured | | |
| 2-14 | Role of the Board of Directors in sustainability reporting | 179 | Assured | | The Sustainability Report, including the list of material topics, has been approved by the Board of Directors, Minutes No. GMK/16-pr-sd dated 26 May 2025 |
| 2-15 | Conflicts of interest | 237 | Assured | | The Company publicly discloses information on interested-party transactions in its annual reports |

| GRI Standards 2021 disclosure number | Disclosure | Page/Link | Assured by the auditor | Omissions | Comments |
|---|---|--|------------------------|---|--|
| 2-16 | Communication of critical concerns | 234, 250 | Assured | | |
| 2-17 | Collective knowledge of the highest governance body | 235 | Assured | | |
| 2-18 | Evaluation of the performance of the highest governance body | 235 | Assured | | |
| 2-19 | Remuneration policies | 237 | Assured | | There are no termination payments or retirement benefits for members of the Board of Directors ¹ . The Company's management are subject to the same termination payment and retirement benefit rules as other employees of the Company |
| 2-20 | Process to determine remuneration | 237 | Assured | Information reported under 2-20-b is not disclosed, as this reporting requirement is not applicable | No remuneration consultants are used by the Company. In the reporting year, the Remuneration Policy for Members of the Board of Directors at PJSC MMC Norilsk Nickel was updated in accordance with the resolution passed by the General Meeting of Shareholders. |
| 2-21 | Annual total compensation ratio | – | Not assured | The information has not been disclosed to protect the personal data of the highest-paid executive | |
| 4. Strategy, policies, and practices | | | | | |
| 2-22 | Statement on sustainable development strategy | 6 | Assured | | |
| 2-23 | Policy commitments | 37, 180, 246 | Assured | | For sustainable development policies and statements, please see the Company website at https://nornickel.com/investors/disclosure/corporate-documents/ . |
| 2-24 | Embedding policy commitments | 30, 37 | Assured | | Company employees familiarise themselves with internal regulations upon hiring and during internal training sessions conducted by Nornickel. Suppliers and contractors of the Company familiarise themselves with internal regulations when entering into contracts with the Company, if this is stipulated by the terms of the respective contracts |
| 2-25 | Processes to remediate negative impacts | 250 | Assured | | For information on the organisation's commitment to assessing and remediating negative impacts, please see the Human Rights Policy |
| 2-26 | Mechanisms for seeking advice and raising concerns | 63, 76, 124, 153, 250 | Assured | | |
| 2-27 | Compliance with laws and regulations | 346 | Assured | | Significant cases of non-compliance with laws/regulations that resulted in fines or non-financial penalties are understood as events disclosed in Section 26 of the Notes to the Consolidated Financial Statements and/or receiving adverse publicity. There were no such cases in 2024 |
| 2-28 | Membership associations | 34, 48 | Assured | | |
| 5. Stakeholder engagement | | | | | |
| 2-29 | Approach to stakeholder engagement | 61, 62, 63 | Assured | | |
| 2-30 | Collective bargaining agreements | 77 | Assured | | |
| GRI 3: Material Topics 2021 | | | | | |
| Disclosures on material topics | | | | | |
| 3-1 | Process to determine material topics | 301 | Assured | | |
| 3-2 | List of material topics | 301 | Assured | | |
| Training and education | | | | | |
| 3-3 | Management of material topics | 86 Sustainability report 2022, page 312 | Assured | | The effectiveness of the training process is assessed through trainee feedback and satisfaction evaluation |
| 404-1 | Average hours of training per year per employee by gender and employee category | 87 | Assured | | |
| 404-2 | Programmes for upgrading employee skills and transition assistance programmes provided to facilitate continued employability and the management of career endings | 89, 104 | Assured | | |

¹ Except for those Board members who are Company employees.

| GRI Standards 2021 disclosure number | Disclosure | Page/Link | Assured by the auditor | Omissions | Comments |
|---|---|--|------------------------|---|--|
| Employment and decent working conditions in the regions of operation | | | | | |
| 3-3 | Management of material topics | 68, 75, 138 Sustainability report 2022 , page 311 | Assured | | The Equal Opportunities Programme defines the Company's approaches and commitments in providing jobs. The Working Conditions Policy sets forth the Company's principles and commitments in ensuring decent working conditions |
| 201-3 | Defined benefit plan obligations and other retirement plans | 100 | Assured | | Payments under the pension plan are made by NPF GAZFOND Pension Savings. For the fund's public financial reports, please see the website at https://gazfond-pn.ru/about/disclosure/ |
| 202-1 | Ratios of standard entry-level wage by gender compared to local minimum wage at significant locations of operation | 80 | Assured | Ratios of entry-level wage by gender compared to local minimum wage at significant locations of operation are not disclosed due to the lack of a relevant accounting system. The Company will consider disclosing this information within three years | The calculation covered Group companies with an average headcount of at least 500 employees in 2024 |
| 202-2 | Percentage of senior management at significant locations of operation that are hired from the local community | 71 | Assured | | |
| 401-1 | Total number and rate of new employee hires and employee turnover by age group, gender, and region | 74, 339 | Assured | | |
| 401-2 | Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation | 334, 335 | Assured | Partial disclosure. No information is provided for the following types of benefits: life insurance, healthcare, disability and invalidity coverage, parental leave, and stock 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 | 96, 99, 127 | Assured | | The Company respects employees' right to privacy and ensures the confidentiality of their health-related information. Health-related information is classified as a special category of personal data and is processed in full compliance with applicable laws. Under the Labour Code, an employer may not request information about an employee's health, except for details necessary to determine the employee's ability to perform their job functions. The Company does not use data on participation in targeted medical programmes or the use of healthcare services as criteria for decisions related to hiring, dismissal, promotion, demotion, or other employment matters |
| 404-3 | Percentage of employees receiving regular performance and career development reviews, by gender and by employee category | 341 | Assured | | |
| Contribution to the development of local communities | | | | | |
| 3-3 | Management of material topics | 136, 137, 141, 143, 155 Sustainability report 2022 , page 312 | Assured | | |
| 201-1 | Direct economic value generated and distributed | 324 | Assured | | |
| 203-1 | Development and impacts of infrastructure investments and services supported | 137, 143, 151, 158, 284 | Assured | | |
| 203-2 | Significant indirect economic impacts | 138, 139, 158, 284 | Assured | | |
| 204-1 | Proportion of spending on local suppliers | – | Assured | Not disclosed in accordance with the GRI requirements due to the lack of a relevant accounting system. The Company will consider disclosing this information within three years | The Contribution to the Development of Local Communities section discloses information on the Company's spending on procurement from local suppliers in key regions of operation |

| GRI Standards 2021 disclosure number | Disclosure | Page/Link | Assured by the auditor | Omissions | Comments |
|---|--|--|------------------------|---|---|
| 207-1 | Approach to tax | 242 | | | |
| 207-2 | Tax governance, control, and risk management | 242, 250 | Assured | | |
| 207-3 | Stakeholder engagement and management of concerns related to tax | 242, 288 | Assured | | Stakeholders' tax-related concerns, along with other enquiries, may be addressed through the mechanisms of the Corporate Trust Line |
| 207-4 | Country-by-country reporting | – | Assured | Not disclosed due to the confidential nature of the information, as it constitutes a trade secret of the Company | |
| 413-1 | Operations with local community engagement, impact assessments, and development programmes | – | Assured | | The percentage of operations with implemented local community engagement programmes is 4.6% of all business units of the Company |
| Contribution to the development of national industry through the promotion of Russian technologies | | | | | |
| 3-3 | Management of material topics | 38, 280 Sustainability report 2022, page 312 | Assured | | As at 31 December 2024, the Company had not adopted any policies or set targets concerning its contribution to the development of national industry |
| Air pollutant emissions | | | | | |
| 3-3 | Management of material topics | 182 Sustainability report 2022, page 311 | Assured | | |
| 305-7 | Nitrogen oxides (NO _x), sulphur oxides (SO _x), and other significant air emissions | 183, 329 | Assured | Persistent organic pollutants are not emitted. Hazardous air pollutant emissions are not disclosed, as this category is not defined under Russian legislation | Emissions of volatile organic compounds (VOCs) amounted to 2,471 tonnes in 2024 (1,910 tonnes in 2023; 1,366 tonnes in 2022) |
| Innovation projects for sustainable development | | | | | |
| 3-3 | Management of material topics | 38, 274, 280 Sustainability report 2022, page 312 | Assured | | In 2015, Nornickel launched the Technology Breakthrough programme, aimed at building an automated operational control system and enhancing labour productivity and workplace safety, including by integrating advanced information support and automation tools into its production processes. No specific commitments have been established under the Innovation Projects for Sustainable Development topic. For more details, please see the Company's 2024 Annual Report |
| Waste management | | | | | |
| 3-3 | Management of material topics | 189 Sustainability report 2022, page 311 | Assured | | |
| 306-1 | Waste generation and significant waste-related impacts | 189 | Assured | | |
| 306-2 | Management of significant waste-related impacts | 189, 191 | Assured | | |
| 306-3 | Waste generated | 190, 330, 331 | Assured | | |
| 306-4 | Waste diverted from disposal | 191, 330, 331 | Assured | Information on the recovery of waste transferred outside the organisation is disclosed partially (without a breakdown by recovery operation) due to the lack of relevant accounting systems | Information on waste management methods is disclosed in the breakdown specified by Russian laws (within the guidance for completing statistical reporting form 2-TP (waste)). In terms of the relevant GRI Standard, hazardous waste refers to waste classified as hazard classes 1–3 under Russian laws |

| GRI Standards 2021 disclosure number | Disclosure | Page/Link | Assured by the auditor | Omissions | Comments |
|--------------------------------------|--|--|------------------------|--|--|
| 306-5 | Waste directed to disposal | 330, 331 | Assured | Partially disclosed. Internal waste management practices do not imply energy recovery. No breakdown is provided between incineration with and without energy recovery for municipal solid waste transferred to the regional operator, as the operator independently determines the waste treatment method. The applicable legislation does not require the regional operator to provide this information to municipal solid waste generators | |
| Climate change | | | | | |
| 3-3 | Management of material topics | 208, 305 Sustainability report 2022, page 310 | Assured | | |
| 201-2 | Financial implications and other risks and opportunities due to climate change | 216 | Assured | The financial implications of the risk are not disclosed, as no such assessment has been carried out. The assessment of financial implications is planned over the next 3 to 5 years | In 2024, climate-related expenditures, including spending on initiatives to improve energy efficiency and to establish a monitoring system for buildings and structures built on permafrost, amounted to RUB 4.8 billion |
| 302-1 | Energy consumption within the organisation | 228, 229 | Assured | | The Company uses statistical reporting forms adopted in Russia to record energy consumption data. Conversion factors into terajoules (TJ) are based on the GRI 3.0 Guidelines and Engineering Journal, Russian R&D reference book. The Company does not consume cooling energy in its operations. It also does not sell cooling or steam energy |
| 302-3 | Energy intensity | 228 | Assured | | |
| 302-4 | Reduction of energy consumption | 214 | Assured | | Reduction in energy consumption is calculated based on the technical specifications of equipment and other energy-consuming devices replaced under energy efficiency initiatives, as the difference between the consumption of the new, more energy-efficient equipment and that of the old, less energy-efficient equipment |
| 305-1 | Direct (Scope 1) GHG emissions | 222 | Assured | | To calculate GHG emissions, the Company used relevant global warming potential (GWP) values from the IPCC's Sixth Assessment Report, which are 1 for CO ₂ , 27 for CH ₄ (bio, comb), 29.8 for CH ₄ (fug), and 273 for N ₂ O |
| 305-2 | Energy indirect (Scope 2) GHG emissions | 222 | Assured | | |
| 305-3 | Other indirect (Scope 3) GHG emissions | 224 | Assured | | |
| 305-4 | GHG emissions intensity | 222 | Assured | | The calculation includes the following greenhouse gases: carbon dioxide (CO ₂), nitrous oxide (N ₂ O), and methane (CH ₄), with emissions of other greenhouse gases either absent or insignificant. Biogenic CO ₂ emissions are not applicable |
| 305-5 | Reduction of GHG emissions | 214 | Assured | | |
| Health and safety | | | | | |
| 3-3 | Management of material topics | 110 Sustainability report 2022, page 312 | Assured | | |
| 403-1 | Occupational health and safety management system | 110, 112, 117 | Assured | | |

| GRI Standards 2021 disclosure number | Disclosure | Page/Link | Assured by the auditor | Omissions | Comments |
|--------------------------------------|---|--|------------------------|--|---|
| 403-2 | Hazard identification, risk assessment, and incident investigation | 112 , 117 | Assured | | <p>Health and safety risks are identified and assessed at all Group entities covered by the Report, either on an annual basis or ad hoc, as described in the STO KISM 121-211-2017 corporate integrated management standard or similar standards in place at Group entities. The quality of these processes is ensured through the alignment of assessment requirements with the above standards. Employees can report work-related hazards through the following channels:</p> <ul style="list-style-type: none"> • Orally to their immediate supervisor • Through problem-solving board installed at all sites • By sending messages to the relevant H&S unit • Through authorised representatives in H&S committees • At staff meetings • By submitting a work refusal form <p>All work-related injuries are investigated by a dedicated commission as stipulated by national laws</p> |
| 403-3 | Occupational health services | 120 , 126 | Assured | | Contractors work on the Company's premises under contracts that include mandatory health and safety requirements. Before work commences, the Company carries out a range of preparatory measures to ensure its safe execution. During contract execution, the contractor undertakes to independently provide its employees with personal protective equipment. The contractor is also responsible for ensuring compliance with sanitary and epidemiological standards and implementing all necessary health and safety measures. Throughout the course of the work, Nor Nickel monitors contractor employees' compliance with H&S requirements. In addition, the Company provides contractor employees with access to first aid through on-site first-aid posts located at production sites |
| 403-4 | Worker participation, consultation, and communication on occupational health and safety | 124 | Assured | | |
| 403-5 | Worker training on occupational health and safety | 112 , 124 | Assured | | |
| 403-8 | Workers covered by an occupational health and safety management system | 343 | Assured | | |
| 403-9 | Work-related injuries | 114 , 341 | Assured | | Data on total recorded injuries are shown in accordance with the Company's accounting system based on Russian laws |
| 403-10 | Work-related ill health | 114 , 341 | Assured | <p>The number of fatalities as a result of work-related ill health is not disclosed due to the confidential nature of this information and the absence of permission for its use by the government agencies responsible for its storage and record-keeping.</p> <p>Information on work-related ill health among contractors is also not disclosed, as it is not possible to definitively determine whether such cases are directly attributable to work performed at the Company's facilities.</p> <p>Information on the types of work-related ill health and the contributing factors is not disclosed due to the lack of consolidated records. The Company will consider developing an appropriate accounting system within the next three years</p> | |
| Biodiversity | | | | | |
| 3-3 | Management of material topics | 199 Sustainability report 2022 , page 311 | Assured | | |
| 304-1 | Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas | 200 | Assured | | The Company has no sites in protected areas or areas of high biodiversity value |

| GRI Standards 2021 disclosure number | Disclosure | Page/Link | Assured by the auditor | Omissions | Comments |
|---|--|--|------------------------|---|--|
| 304-2 | Significant impacts of activities, products, and services on biodiversity | – | Assured | Information on the number of species affected (unprotected) and the reversibility of the impacts is not disclosed. This remains the subject of further biodiversity research by the Company. The Company will consider disclosing this information within three years | The Company's more than 80-year-long impact on biodiversity has been under detailed study since 2022 as part of the Big Scientific Expedition. Areas affected and impacts for terrestrial and aquatic ecosystems were refined in 2023 and are listed on pages 245–246 of Nornickel's 2023 Sustainability Report . For a list of threatened species identified in the Company's impact area (by division) during the 2023 Big Scientific Expedition, please see pages 416–420 of Nornickel's 2023 Sustainability Report |
| 304-3 | Habitats protected or restored | 195 | Assured | | The information is disclosed in accordance with the land restoration (rehabilitation) practices established under Russian laws. The completion of land rehabilitation is confirmed by government authorities through relevant official documents |
| 304-4 | Total number of IUCN ¹ Red List species and national conservation list species with habitats in areas affected by the operations of the organisation, by level of extinction risk | 204 | Assured | | For a list of protected species identified in the Company's impact area (by division) during the 2023 Big Scientific Expedition, please see pages 416–420 of Nornickel's 2023 Sustainability Report (in 2024, the conservation status of certain species was revised: for example, in the IUCN Red List, the status of the grey-tailed tattler (<i>Heteroscelus brevipes</i>) and falcated duck (<i>Anas falcata</i>) changed from Near Threatened (NT) to Least Concern (LC)). The list of rare and protected species identified in the areas hosting Trans-Baikal Division facilities additionally includes: siler (<i>Saposhnikovia divaricata</i>) – status in the Trans-Baikal Territory's Red Data Book: 4, uncertain; balloon flower (<i>Platycodon grandiflorus</i>) – status in the Trans-Baikal Territory's Red Data Book: 2, declining; Baikal skullcap (<i>Scutellaria baicalensis Georgi</i>) – status in the Trans-Baikal Territory's Red Data Book: 2, declining; and yellow-breasted bunting (<i>Emberiza aureola</i>) – status in the Trans-Baikal Territory's Red Data Book: 3, rare. The list of rare and protected species identified in the areas hosting facilities operated by the Trans-Baikal and Energy Divisions also includes lesser clubmoss (<i>Selaginella selaginoides</i> (L.)) – status in the Krasnoyarsk Territory's Red Data Book: 2, declining |
| Water consumption and wastewater discharge | | | | | |
| 3-3 | Management of material topics | 185 Sustainability report 2022 , page 311 | Assured | | |
| 303-1 | Interactions with water as a shared resource | 185 , 188 , 326 | Assured | | Supplier engagement on water impacts is governed by PJSC MMC Norilsk Nickel's Supplier Code of Conduct ; customer consultations may be conducted upon request |
| 303-2 | Management of water discharge-related impacts | 185 | Assured | | The Company's wastewater quality standards are established based on: <ul style="list-style-type: none"> Order of the Russian Ministry of Agriculture No. 552, On Approval of Water Quality Standards for Fishery Water Bodies, Including Standards on Maximum Permissible Concentrations for Hazardous Substances in Fishery Water Bodies, dated 13 December 2016 Resolution of the Chief Sanitary Doctor of Russia No. 2, On Approval of Sanitary Rules and Norms SanPiN 1.2.3685-21 Hygienic Standards and Requirements for Ensuring Safety and/or Harmlessness of Environmental Factors for Humans, dated 28 January 2021 |
| 303-3 | Water withdrawal | 185 , 186 , 325 | Assured | | The regions hosting Company enterprises are classified as areas with normal to high water availability. The volume of water withdrawal is recorded using instrumental methods based on certified meters, as well as by indirect methods approved by the relevant regional offices of the Federal Water Resources Agency |
| 303-4 | Water discharge | 185 , 187 , 328 | Assured | | All water discharged by the Company is not considered freshwater (under GRI terminology). The Company discharges wastewater of the following categories: drainage water, municipal wastewater, wastewater from other discharge systems, as well as mine water, pit water, and stormwater. Mine water, pit water, and drainage water may be classified as mineralised under GRI terminology (with total dissolved solids exceeding 1,000 mg/L). In 2024, isolated cases of exceeding permissible discharge limits were identified. Key substances targeted in wastewater treatment include suspended solids, dry residue, nitrogen compounds, metals, and phosphates. Group enterprises maintain form 2-TP (water management) reports and water use logs |
| 303-5 | Water consumption | 185 | Assured | Information on the impact that changes in water volumes of water reservoirs (storage basins) have on water bodies is not collected | In line with the GRI 303 (2018) methodology, total water consumption in 2024 amounted to 67.8 Mcm |
| Information security | | | | | |
| 3-3 | Management of material topics | 291 , 305 | Assured | | |

¹ International Union for Conservation of Nature and Natural Resources.

| GRI Standards 2021 disclosure number | Disclosure | Page/Link | Assured by the auditor | Omissions | Comments |
|---|---|--|------------------------|--|---|
| Industrial environmental safety of production facilities (including tailings storage facilities) | | | | | |
| 3-3 | Management of material topics | 130, 193 Sustainability report 2022, page 311 | Assured | | |
| 306-3 (2016) | Significant spills | – | Assured | | In 2024, there were no significant spills |
| Responsible exploration and land rehabilitation | | | | | |
| 3-3 | Management of material topics | 195 Sustainability report 2022, page. 31 | Assured | | |
| Responsible supply chain | | | | | |
| 308-1 | New suppliers that were screened using environmental criteria | – | Assured | | Partial disclosure. The existing supply chain due diligence management system covers suppliers, processors, and transporters of metal-containing mineral feedstocks ("mineral suppliers") as well as suppliers of goods, works, and services (i.e. all categories of the Group's suppliers). As part of this due diligence, 12 active mineral suppliers ¹ were assessed in 2024, with 11 of them evaluated against environmental and social criteria. In 2024, the Company engaged two new mineral suppliers (they are included in the group of 12 active mineral suppliers mentioned above). Both new suppliers were assessed, with one of them also evaluated against environmental and social criteria. Following the assessment, all audited mineral suppliers were found to meet the environmental and social criteria set out in PJSC MMC Norilsk Nickel's Supplier Code of Conduct . No significant environmental or social risks were identified. During the reporting period, the Company assessed the sustainability practices of a sample of goods, works, and services suppliers for compliance with the Code requirements. The sample covered 35% of the Group's total procurement volume. The survey results for the goods, works, and services supplier sample are disclosed in detail in Norickel's 2024 Responsible Supply Chain Report |
| 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 | | |
| Anti-corruption and business ethics | | | | | |
| 205-1 | Total number and percentage of operations assessed for risks related to corruption, and significant risks identified | 260 | Assured | | In 2024, the assessment of corruption-related ² risks covered 77 units, representing 89% of all Group units |
| 205-2 | Communication and training about anti-corruption policies and procedures | 257 | Assured | | All members of the Board of Directors carry out their duties in practice in Moscow. The Company's anti-corruption policies and procedures have been communicated to all members of the Board of Directors (13 people). In 2024, access to training on anti-corruption policies and procedures was provided to all members of the Board of Directors (13 people). The Anti-Corruption for Managers remote learning course is available at any time to all members of the Board of Directors via the Norickel Academy platform. The Anti-Corruption Policy is communicated to counterparties when contracts are concluded |
| 205-3 | Confirmed incidents of corruption and actions taken | 256 | Assured | | |
| Respect for human rights (including those of indigenous minorities) | | | | | |
| 401-3 | The proportion of employees that returned to work after parental leave ended and the proportion of employees that were still employed after their return to work, by gender | 340 | Assured | Partial disclosure is used due to the lack of a relevant accounting system; information is provided on the total number of employees that took maternity and/or childcare leave and employees that returned to work after the leave ended. The Company will consider developing an appropriate accounting system within the next three years | |
| 402-1 | Minimum notice periods regarding operational changes | 77 | Assured | | |
| 405-1 | Diversity of governance bodies and employees | 71, 72, 324 | Assured | | |

¹ In the reporting period, a mineral supplier due diligence was conducted, including on internal suppliers within the Norickel Group.

² Corruption-related risks were assessed across the aspects relevant to the Group's anti-corruption efforts.

| GRI Standards 2021 disclosure number | Disclosure | Page/Link | Assured by the auditor | Omissions | Comments |
|--------------------------------------|---|---------------------|------------------------|--|--|
| 405-2 | Ratio of basic salary and remuneration of women to men | – | Assured | Not disclosed due to the lack of a relevant accounting system. The Company will consider developing an appropriate accounting system within the next three years. This Report provides information on the ratio of wages received by male and female employees by job category | |
| 406-1 | Incidents of discrimination and corrective actions taken | – | Assured | | No incidents of discrimination have been recorded |
| 407-1 | Operations and suppliers in which workers' rights to exercise freedom of association or collective bargaining may be violated or at significant risk and measures taken | – | Assured | Partially disclosed (for mineral suppliers only) | There are no such units (based on the 2022 human rights impact assessment). The existing supply chain due diligence management system covers mineral suppliers and suppliers of goods, works, and services (i.e. all categories of the Group's suppliers). As part of this due diligence, 12 active mineral suppliers ¹ were assessed in 2024, with 11 of them evaluated against environmental and social criteria. Among the 11 mineral suppliers that underwent due diligence and were assessed for compliance with the right to freedom of association and collective bargaining – as part of evaluating adherence to PJSC MMC Norilsk Nickel's Supplier Code of Conduct , no such violations were identified |
| 408-1 | Operations and suppliers at significant risk for incidents of child labour | – | Assured | Partially disclosed (for mineral suppliers only) | There are no such units (based on the 2022 human rights impact assessment). The existing supply chain due diligence management system covers mineral suppliers and suppliers of goods, works, and services (i.e. all categories of the Group's suppliers). As part of this due diligence, 12 active mineral suppliers ¹ were assessed in 2024, with 11 of them evaluated against environmental and social criteria. Among the 11 mineral suppliers that underwent due diligence and were assessed for risks related to child labour – as part of evaluating adherence to PJSC MMC Norilsk Nickel's Supplier Code of Conduct , no such violations were identified |
| 409-1 | Operations and suppliers at significant risk for incidents of forced or compulsory labour | – | Assured | Partially disclosed (for mineral suppliers only) | There are no such units (based on the 2022 human rights impact assessment). The existing supply chain due diligence management system covers mineral suppliers and suppliers of goods, works, and services (i.e. all categories of the Group's suppliers). As part of this due diligence, 12 active mineral suppliers ¹ were assessed in 2024, with 11 of them evaluated against environmental and social criteria. Among the 11 mineral suppliers that underwent due diligence and were assessed for risks related to modern slavery, including forced or compulsory labour – as part of evaluating adherence to PJSC MMC Norilsk Nickel's Supplier Code of Conduct , no such violations were identified |
| 410-1 | Security personnel trained in human rights policies or procedures | 249 | Assured | | |
| 411-1 | Incidents of violations involving rights of indigenous peoples | 151 | Assured | | |
| 413-2 | Operations with significant actual and potential negative impacts on local communities | 182 | Assured | – | The main operation that has a significant negative impact on local communities is the Norilsk site of the Polar Division. The primary source of this impact is sulphur dioxide emissions into the atmosphere |

¹ In the reporting period, a mineral supplier due diligence was conducted, including on internal suppliers within the Norilsk Nickel Group.

GRI quantitative indicators disclosure

Direct economic value generated and distributed (RUB bn)

GRI 201-1 GRI 14.9.2, 14.23.2

| Indicators | 2020 | 2021 | 2022 | 2023 | 2024 |
|--|---------|---------|---------|---------|----------------|
| Direct economic value generated | 1,123.2 | 1,324.1 | 1,183.6 | 1,235.2 | 1,172.7 |
| Economic value distributed, including: | 811.6 | 1,241.4 | 939.8 | 1,018.6 | 946.6 |
| • operating costs ¹ | 295.2 | 423.0 | 292.2 | 409.7 | 452.1 |
| • community investments and charitable activities ² | 9.7 | 33.0 | 31.7 | 25.1 | 26.0 |
| • employee wages and benefits, including payroll taxes | 147.6 | 164.7 | 224.5 | 234.9 | 248.0 |
| • payments to providers of capital (interest, dividends ³) | 213.8 | 412.2 | 202.8 | 171.6 | 62.3 |
| • gross tax payments | 145.2 | 208.4 | 188.6 | 177.3 | 158.2 |
| Economic value retained | 311.7 | 82.8 | 243.9 | 216.5 | 226.1 |

Structure of the Board of Directors and the Management Board (people)

GRI 405-1 GRI 14.21.5

| Indicators | Board of Directors | | Management Board | |
|----------------|--------------------|---------|------------------|---------|
| | Male | Female | Male | Female |
| Under 30 years | 0 (0%) | 0 (0%) | 0 (0%) | 0 (0%) |
| 30–50 years | 3 (23%) | 1 (8%) | 5 (36%) | 2 (14%) |
| Over 50 years | 6 (46%) | 3 (23%) | 4 (29%) | 3 (21%) |

¹ Since 2020, this line has included environmental and decommissioning provisions.

² Excluding CAPEX.

³ Accrued dividends are included in the calculation.

Total water withdrawal (Mcm)⁴

GRI 303-3 / SASB EM-MM-140a.1 GRI 14.7.4

| Indicators | | Total water withdrawal from external sources ⁵ | Including | | | |
|---|------|---|---------------|-------------|----------------------|---|
| | | | Surface water | Groundwater | Natural water inflow | Third-party wastewater and water from municipal or other water networks (excluding networks of the Energy Division's energy enterprise) |
| Group's total | 2024 | 321.2 | 218.3 | 26.2 | 49.9 | 26.8 |
| | 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 |
| The Norilsk site's production enterprise (Talnakhskoye, Oktyabrskoye, and Norilsk-1 deposits) | 2024 | 25.9 | 0.0 | 0.0 | 20.8 | 5.1 |
| | 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 |
| The Energy Division's energy enterprise and MMC Norilsk Nickel's energy branch | 2024 | 234.2 | 200.8 | 25.6 | 2.7 | 5.0 |
| | 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 |
| The Kola site's metals and mining enterprise | 2024 | 37.1 | 13.9 | 0.0 | 12.7 | 10.5 |
| | 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 |

Water withdrawal by water source and type in 2022–2024 (Mcm)

GRI 303-3 / SASB EM-MM-140a.1 / TNFD A3.0 GRI 14.7.4

| Indicators | 2022 | 2023 | 2024 |
|---------------------------|-------|-------|-------|
| Total water withdrawal | 353.1 | 315.0 | 321.2 |
| Surface water, including: | 233.2 | 207.3 | 218.3 |
| • freshwater | 233.2 | 207.3 | 218.3 |
| • other water | 0.0 | 0.0 | 0.0 |
| Groundwater, including: | 24.4 | 26.2 | 26.2 |

⁴ Figures may not sum up due to rounding.

⁵ Excluding water withdrawal from the networks of the Energy Division's energy enterprise

| Indicators | 2022 | 2023 | 2024 |
|---|------|------|------|
| • freshwater | 24.4 | 26.2 | 26.2 |
| • other water | 0.0 | 0.0 | 0.0 |
| Third-party wastewater and water from municipal or other water networks (excluding networks of the Energy Division's energy enterprise), including: | 33.6 | 29.9 | 26.8 |
| • freshwater | 9.2 | 0.0 | 0.0 |
| • other water | 24.4 | 29.9 | 26.8 |
| Natural water inflow, including: | 61.9 | 51.5 | 49.9 |
| • freshwater | 0.0 | 0.0 | 0.0 |
| • other water | 61.9 | 51.5 | 49.9 |
| From the networks of the Energy Division's energy enterprise, including: | 85.6 | 87.4 | 91.8 |
| • freshwater | 85.6 | 87.4 | 91.8 |
| • other water | 0.0 | 0.0 | 0.0 |
| Water in a sea or in an ocean, including: | 0.0 | 0.0 | 0.0 |
| • freshwater | 0.0 | 0.0 | 0.0 |
| • other water | 0.0 | 0.0 | 0.0 |

Water bodies used for water withdrawal and wastewater discharge¹

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

GRI 14.7.2

| Branches and business units | Water bodies used for water withdrawal and assessment of the significance of the Company's associated impacts | Water bodies used for wastewater discharge and assessment of the significance of the Company's associated impacts |
|--|---|--|
| Business units and branches in the Norilsk Industrial District | Water is withdrawn from the Yenisei River and water bodies of the Norilo-Pyasinskaya water system and the Kara Sea. The Company's operations have no significant impact on the water bodies | Wastewater is discharged to water bodies of the Yenisei River basin and the Norilo-Pyasinskaya water system. The Company's operations have no significant impact on the water bodies |
| Business units and branches in the Murmansk Region | Water is withdrawn from the Barents Sea's water bodies. The Company's operations have no significant impact on the water bodies | Wastewater is discharged to the Barents Sea's water bodies. The Company's operations have no significant impact on the water bodies |
| Business units of the Trans-Baikal Division in Chita | Water is withdrawn from the Amur River basin's water bodies. The Company's operations have no significant impact on the water bodies | Wastewater is discharged to the Amur River basin's water bodies. The Company's operations have no significant impact on the water bodies |
| Business units in Sochi | Water is withdrawn from the Black Sea. The Company's operations have no significant impact on the water bodies | Wastewater is discharged to the Black Sea. The Company's operations have no significant impact on the water bodies |

¹ The Company does not have a material impact on any of the specified water bodies. Water is withdrawn within the established limits. Wastewater is discharged in accordance with the relevant permits and predominantly within the permitted limits.

Water use, including water recycling, Mcm

MED-13, MED-14 / TNFD A3.0, TNFD A3.2

| Indicators | | Total water consumption and withdrawal | Including | | | Water recycled and reused as percentage of total water consumption and withdrawal | |
|--|------|--|---------------|------------|---|---|------|
| | | | Utility water | Production | Including Water reused Water recycled | | |
| Group's total | 2024 | 1,224.3 | 24.4 | 1,200.0 | 71.6 | 920.3 | 81.0 |
| | 2023 | 1,291.9 | 22.9 | 1,268.9 | 52.1 | 1,015.8 | 82.7 |
| | 2022 | 1,351.4 | 21.6 | 1,329.7 | 27.1 | 1,077.8 | 81.8 |
| | 2021 | 1,280.8 | 25.2 | 1,255.6 | 31.6 | 1,052.0 | 84.6 |
| | 2020 | 1,458.1 | 23.0 | 1,435.1 | 31.2 | 1,229.0 | 86.4 |
| Including: The Norilsk site's production enterprise (Talnakhskoye, Oktyabrskoye, and Norilsk-1 deposits) and MMC Norilsk Nickel's energy branch | 2024 | 449.5 | 6.7 | 442.7 | 28.6 | 354.3 | 85.2 |
| | 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 |
| Including: The Energy Division's energy enterprise | 2024 | 547.4 | 10.5 | 536.9 | 0.9 | 440.7 | 80.7 |
| | 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 |
| Including: The Kola site's metals and mining enterprise | 2024 | 113.3 | 1.7 | 111.6 | 0.2 | 91.0 | 80.5 |
| | 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 |
| Other entities | 2024 | 114.2 | 5.5 | 108.7 | 41.9 | 34.2 | 66.6 |
| | 2023 | 115.2 | 5.3 | 109.9 | 22.4 | 53.7 | 66.1 |

Total wastewater discharge¹ and the weight of pollutant discharges²

GRI 303-4 / MED-15 / TNFD C2.1

GRI 14.7.5

| Indicators | | Total wastewater discharge (Mcm) | Including | | | | Pollutants in wastewater discharge, kt |
|---|--|----------------------------------|------------------------|------------------------|---|------------------------------------|--|
| | | | Insufficiently treated | Contaminated untreated | Treated to standard quality at treatment facilities | Standard clean (without treatment) | |
| Group's total | 2024 | 223.8 | 31.3 | 37.4 | 10.3 | 144.9 | 89.9 |
| | 2023 | 147.1 | 32.2 | 40.8 | 6.7 | 67.5 | 157.3 |
| | 2022 | 168.0 | 34.1 | 40.7 | 3.7 | 89.5 | 208.6 |
| | 2021 | 193.8 | 33.8 | 60.3 | 4.9 | 94.8 | 237.0 |
| | 2020 | 202.4 | 33.1 | 54.8 | 4.3 | 110.2 | 244.3 |
| | Including: The Norilsk site's production enterprise (Talnakhskoye, Oktyabrskoye, and Norilsk-1 deposits) and MMC Norilsk Nickel's energy branch | 2024 | 22.8 | 1.0 | 21.5 | 0.4 | – |
| 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 |
| Including: The Energy Division's energy enterprise | | 2024 | 155.9 | – | 6.3 | 5.0 | 144.6 |
| | 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 |
| | Including: The Kola site's metals and mining enterprise | 2024 | 25.8 | 25.7 | 0.2 | – | – |
| 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 |
| Other entities | | 2024 | 19.2 | 4.7 | 9.4 | 4.9 | 0.3 |
| | 2023 | 22.9 | 5.0 | 11.9 | 5.7 | 0.3 | 36.6 |

¹ Discharges are measured using meters.

² The Group's main pollutants are those that dominate in the volume of its wastewater: suspended solids, oil products, metals, and nitrogen compounds.

NO_x, SO_x and other significant air emissions, including their type and weight³ (kt)

GRI 305-7 / MED-19 / TNFD C2.4

GRI 14.3.2

| Indicators | | Group's total | The Norilsk site's production enterprise (Talnakhskoye, Oktyabrskoye, and Norilsk-1 deposits) | The Energy Division's energy enterprise | The Kola site's metals and mining enterprise | Other entities |
|-------------------------------|----------------------------------|---------------|---|---|--|----------------|
| Total emissions | 2024 | 1,307.2 | 1,268.2 | 6.5 | 16.7 | 15.8 |
| | 2023 | 1,707.7 | 1,671.5 | 5.8 | 16.3 | 14.1 |
| | 2022 | 1,819.4 | 1,778.9 | 9.8 | 16.4 | 14.3 |
| | 2021 | 1,646.9 | 1,601.4 | 12.6 | 19.6 | 13.3 |
| | 2020 | 1,968.1 | 1,857.5 | 10.1 | 83.4 | 17.1 |
| | Including: NO _x | 2024 | 6.1 | 0.8 | 2.5 | 1.4 |
| 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 |
| Including: Sulphur dioxide | | 2024 | 1,269.0 | 1,255.9 | 0.0 | 12.8 |
| | 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 |
| | Including: Particulate matter | 2024 | 11.0 | 5.1 | 0.0 | 1.2 |
| 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 |
| Other pollutants | | 2024 | 21.0 | 6.4 | 4.0 | 1.2 |
| | 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 |

³ Air pollutant emissions are determined based on data from environmental monitoring and environmental operational control: emissions are calculated using approved methodologies based on feedstock and equipment running time, sampling and chemical analysis of flue gases, direct measurements using gas analysers, and other approaches.

Total weight of waste generated by type and disposal operation (mln t)

GRI 306-3, 306-4, 306-5 / SASB EM-MM-150a.8 / MED-18 / TNFD C2.2 GRI 14.5.4, 14.5.5, 14.5.6

| Indicators | Total, mln t ¹ | Including | | | | The Norilsk site's production enterprise (Norilsk-1 deposit) |
|--|---------------------------|---|--|--|--|--|
| | | The Norilsk site's production enterprise (Talnakhskeye, Oktyabrskoye, and Norilsk-1 deposits) | The Kola site's metals and mining enterprise | The Trans-Baikal Division's mining and processing enterprise | The Norilsk site's production enterprise | |
| Waste generation | 2024 | 174.2 | 15.3 | 7.1 | 86.4 | 53.8 |
| | 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 |
| Acceptance of third-party waste | 2024 | 1.6 | 0.2 | 0.0 | 0.0 | 1.3 |
| | 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 |
| Onsite waste recovery | 2024 | 26.7 | 9.4 | 3.8 | 4.8 | 8.6 |
| | 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 |
| Onsite waste treatment | 2024 | 0.0005 | 0.00001 | 0.0002 | 0.0 | 0.0 |
| | 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 |
| Waste transfer to third parties (for recycling or treatment) | 2024 | 2.9 | 1.6 | 0.002 | 0.003 | 1.3 |
| | 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 |
| Waste transfer to third parties (for disposal) | 2024 | 0.3 | 0.11 | 0.0 | 0.0 | 0.005 |
| | 2023 | 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 |
| Waste landfilling at onsite waste disposal facilities | 2024 | 0.5 | 0.5 | 0.01 | 0.005 | – |
| | 2023 | 0.8 | 0.8 | 0.01 | 0.005 | 0.0 |
| | 2022 ² | 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 |

¹ Totals include other assets.

² In 2022, the calculation methodology was revised in accordance with GRI 306-5. Since then, the indicator includes only waste disposal through landfilling.

Waste management in 2024 by hazard class and waste type (kt)³

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 / UNCTAD B.2.1, B.2.2, B.2.3 / MED-17, MED-18 / TNFD C2.2

GRI 14.5.4, 14.5.5, 14.5.6

| Indicators | Hazard class 1 | Hazard class 2 | Hazard class 3 | Hazard class 4 | Hazard class 5 | Total | Including hazard classes 1–3 waste (% of total) |
|---|----------------|----------------|----------------|----------------|----------------|-----------|---|
| Generation | 0.014 | 0.068 | 6.9 | 1,154.2 | 173,082.3 | 174,243.5 | 0.0 |
| Waste generation after processing | – | – | 4.3 | 0.93 | – | 5.23 | 82.3 |
| Acceptance of third-party waste | – | – | 1.22 | 109.47 | 1,439.52 | 1,550.22 | 0.1 |
| Onsite waste recovery, including: | – | – | 2.3 | 0.13 | 26,690.98 | 26,693.41 | 0.01 |
| • direct recycling and reuse | – | – | 0.01 | 0.015 | 13,448.65 | 13,448.68 | 0.0 |
| • other recovery operations | – | – | 2.3 | 0.11 | 13,242.33 | 13,244.74 | 0.0 |
| Onsite waste treatment | – | 0.01 | 0.16 | 0.16 | 0.13 | 0.46 | 36.3 |
| Waste transfer to third parties (for processing) | – | – | 1.55 | 7.12 | 21.27 | 29.94 | 5.2 |
| Waste transfer to third parties (for recovery) | 0.001 | 0.05 | 2.9 | 7.1 | 2,869.5 | 2,879.6 | 0.1 |
| Waste transfer to third parties (for treatment) | 0.02 | 0.003 | 1.807 | 1.27 | 1.09 | 4.19 | 43.6 |
| Waste transfer to third parties (for disposal) | – | – | – | 165.44 | 130.98 | 296.42 | 0.0 |
| Transfer to local municipal solid waste operator | – | – | – | 19.2 | 1.15 | 20.3 | 0.0 |
| Waste landfilling at onsite waste disposal facilities | – | – | 0.001 | 366.01 | 143.97 | 509.97 | 0.0 |
| Waste put back into use (recovered onsite or by contractors) | 0.001 | 0.05 | 5.2 | 7.2 | 29,560.5 | 29,573.00 | 0.02 |
| Waste disposed of (treated or disposed onsite or by contractors) ⁴ | 0.02 | 0.01 | 2.0 | 532.88 | 276.1 | 811.05 | 0.17 |

³ Figures may not sum up due to rounding.

⁴ Excluding the transfer of waste to third parties for storage purposes.

The Company's gypsum and tailings storage facilities

[SASB EM-MM-540a.1](#)
[GRI 14.6.3,](#)

| Tailings storage facilities | Location | Ownership status | Operational status | Raising method | Permitted maximum storage (Mcm) | Amount of tailings stored as at 31 December 2024 (Mcm) | Class of consequences | Date of most recent independent technical review | Significant safety findings | Mitigation | Availability of the site-specific emergency preparedness and response plan |
|---|---|--------------------|--|----------------|---------------------------------|--|-----------------------|--|----------------------------------|----------------|--|
| Tailings storage facility of Talnakh Concentrator | Norilsk | Owned by the Group | Operating | Upstream | 198.00 | 31.92 | High | February 2024 | Dam safety level: normal | Not applicable | Yes |
| Tailings storage facility No. 1 of Norilsk Concentrator | Norilsk | Owned by the Group | Used as an intermediate storage facility | Upstream | 144.00 | 144.00 | High | August 2024 | Dam safety level: unsatisfactory | Not applicable | Yes |
| Lebyazhye tailings storage facility | Norilsk | Owned by the Group | Operating | Upstream | 343.05 | 238.50 | High | November 2024 | Dam safety level: unsatisfactory | Not applicable | Yes |
| Tailings storage facility of Nadezhda Metallurgical Plant | Territory of the Norilsk Urban District | Owned by the Group | Operating | Downstream | 40.00 | 36.26 | High | March 2021 | Dam safety level: normal | Not applicable | Yes |
| Gypsum storage facility No. 1 | Territory of the Norilsk Urban District | Owned by the Group | Under construction | Upstream | 90.00 | Not applicable | Low | Not applicable | Not applicable | Not applicable | Not applicable |
| Tailings storage facility at the concentrator's tailings management area of the Zapolyarny site, the Kola site's metals and mining enterprise | Murmansk Region, 1 km to the south of Zapolyarny, Pechengsky District | Owned by the Group | Operating | Upstream | 275.23 | 255.68 | High | November 2023 | Dam safety level: normal | Not applicable | Yes |
| Tailings storage facility of the Trans-Baikal Division's mining and processing enterprise | Gazimuro-Zavodsky Administrative District, 15 km away from the Gazimursky Zavod village | Owned by the Group | Operating | Upstream | 186.00 | 37.03 | High | May 2022 | Dam safety level: lowered | Not applicable | Yes |

Social performance

Benefits provided to Norilsk site employees

GRI 401-2 GRI 14.17.4

| Benefits | Full-time employment | | Temporary employment ¹ | | Seasonal employment | | Part-time employment |
|---|----------------------|----------------|-----------------------------------|----------------|---------------------|----------------|----------------------|
| | Full-time work | Part-time work | Full-time work | Part-time work | Full-time work | Part-time work | |
| Reimbursement of holiday travel expenses for a round trip | + ² | + ² | + ² | + ² | + ³ | + ³ | - ² |
| All types of financial assistance | + | + | + | + | + | + | - ⁴ |
| Health resort treatment and recreation | + ⁵ | + ⁵ | + ⁵ | + ⁵ | - | - | - ⁵ |
| Children's health camps vouchers | + | + | + | + | - | - | - ⁴ |
| Spending on pension plans | + | + | + | + | - | - | - ⁴ |
| Redundancy payments (over and above legal minimums) | + | + | + | + | + ⁶ | + ⁶ | - |

Benefits provided to Kola site employees

GRI 401-2 GRI 14.17.4

| Benefits | Full-time employment | | Temporary employment ¹ | | Seasonal employment ⁷ | | Part-time employment |
|---|----------------------|----------------|-----------------------------------|----------------|----------------------------------|----------------|----------------------|
| | Full-time work | Part-time work | Full-time work | Part-time work | Full-time work | Part-time work | |
| Reimbursement of holiday travel expenses for a round trip | + ² | + ² | + ² | - | - | - | - ² |
| All types of financial assistance | + | + | + | - | - | - | - ⁴ |
| Health resort treatment and recreation | + | + | + | - | - | - | - ⁵ |
| Children's health camps vouchers | + | + | + | - | - | - | - ⁴ |
| Spending on pension plans | + | + | + | - | - | - | - ⁴ |
| Redundancy payments (over and above legal minimums) | + | + | + | - | - | - | - |

¹ Work under a fixed-term employment contract.

² The benefit is available to employees who have the Company as their primary employer with workplaces in the Far North, including employees using fly-in fly-out work arrangements but permanently residing in the Far North.

³ According to the collective bargaining agreement and internal regulations, such categories of employees are not excluded from benefits; however, in practice, travel expenses are not reimbursed since these employees are not granted vacation leave.

⁴ The benefit is available to employees who have the Company as their primary employer.

⁵ The benefit is available to employees who have the Company as their primary employer with workplaces in the Far North.

⁶ According to the collective bargaining agreement and internal 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.

⁷ No seasonal work is carried out; employees do not work seasonally.

Benefits provided to Trans-Baikal Division employees

GRI 401-2 GRI 14.17.4

| Benefits | Full-time employment | | Temporary employment | | Seasonal employment ⁸ | | Part-time employment |
|---|----------------------|----------------|----------------------|----------------|----------------------------------|----------------|----------------------|
| | Full-time work | Part-time work | Full-time work | Part-time work | Full-time work | Part-time work | |
| Reimbursement of holiday travel expenses for a round trip | + | + | + | + | - | - | + |
| All types of financial assistance | + | + | + | + | - | - | - ⁹ |
| Health resort treatment and recreation | + | + | + | - | - | - | - ⁹ |
| Children's health camps vouchers | + | + | + | - | - | - | - ⁹ |
| Pension plans ¹⁰ | - | - | - | - | - | - | - |
| Redundancy payments (over and above legal minimums) | + | + | + | + | - | - | - |

Benefits provided to Head Office employees

GRI 401-2 GRI 14.17.4

| Benefits | Full-time employment | | Temporary employment | | Seasonal employment ¹¹ | | Part-time employment |
|---|----------------------|-----------------|----------------------|-----------------|-----------------------------------|----------------|----------------------|
| | Full-time work | Part-time work | Full-time work | Part-time work | Full-time work | Part-time work | |
| Reimbursement of holiday travel expenses for a round trip | + ¹² | + ¹² | + ¹² | + ¹² | - | - | - ¹² |
| All types of financial assistance | + | + | + | + | - | - | - ¹³ |
| Health resort treatment and recreation ¹⁴ | - | - | - | - | - | - | - |
| Children's health camps vouchers | + | + | + | + | - | - | - ¹³ |
| Spending on pension plans | + | + | + | + | - | - | - ¹³ |
| Redundancy payments (over and above legal minimums) | + | + | + | + | - | - | - |

⁸ No seasonal work is carried out; employees do not work seasonally.

⁹ The benefit is available to employees who have the employer as their primary employer.

¹⁰ Pension plans are not available.

¹¹ At the Head Office, no seasonal work is carried out; employees do not work seasonally.

¹² The benefit is available to employees who have the Company as their primary employer with workplaces in the Far North.

¹³ The benefit is available to employees who have the Company as their primary employer.

¹⁴ The Head Office does not offer any health resort treatment programmes.

Participants by key health improvement programme (people)

| Key health improvement programmes | Indicators | | | | |
|---|---------------|---------------|---------------|---------------|---------------|
| | 2021 | 2022 | 2023 | 2024 | 2025 (plan) |
| Zapolyarye health resort (Sochi) | 16,592 | 17,852 | 17,458 | 17,608 | 19,065 |
| Including a combined programme: health resort in the Mountain Olympic Village (7 days) + Zapolyarye health resort (14 days) | 3,650 | 3,650 | 3,650 | 0 | 0 |
| Kolsky Health and Spa Centre (Monchegorsk) | 1,564 | 2,004 | 1,693 | 1,672 | 1,687 |
| Vacations in third-party health resorts | 1,988 | 4,190 | 3,824 | 2,642 | 3,425 |
| • Russia and Belokurikha health resorts (Altai Territory) | 837 | 895 | 852 | 843 | 810 |
| • Primorye Grand Resort Hotel and Golubaya Dal health resort (Gelendzhik) | 800 | 1,626 | 1,716 | 1,466 | 2,173 |
| • Malaya Bukhta health resort (Anapa) | 0 | 700 | 0 | 0 | 0 |
| • Viktoriya, Tsentrosoyuz-Kislovodsk, Sechenov health resorts (the Caucasian Mineral Waters) | 0 | 380 | 350 | 150 | 149 |
| • A health resort in the Mountain Olympic Village (18 days) | 324 | 0 | 0 | 150 | 250 |
| • Combined programme: a health resort in the Mountain Olympic Village + Imeretinsky Resort | 0 | 559 | 0 | 0 | 0 |
| • Yantarny Bereg and Yantar health resorts (Kaliningrad Region) | 0 | 0 | 880 | 0 | 0 |
| • Other third-party health resorts | 27 | 30 | 26 | 33 | 43 |
| Children's recreation (Vita health resort in Anapa, Universiade Village's sports camp in Kazan) | 1,330 | 1,527 | 1,592 | 1,656 | 1,667 |
| International corporate retreat programme (Bulgaria in 2021 and China in 2024) | 3,041 | 14 | 0 | 1,036 | 0 |
| Total participants | 24,515 | 25,587 | 24,567 | 24,614 | 25,844 |

Participants of the Co-Funded Pension Plan by region (people)

| | | | | |
|----------------------|--------------|--------------|-----------|--------------|
| 2020 | 9,288 | 2,215 | 16 | 11,519 |
| 2021 | 8,737 | 2,013 | 26 | 10,776 |
| 2022 | 8,361 | 2,015 | 30 | 10,406 |
| 2023 | 8,378 | 1,962 | 40 | 10,380 |
| 2024 (plan) | 8,434 | 2,050 | 41 | 10,525 |
| 2024 (actual) | 8,048 | 1,859 | 47 | 9,954 |
| 2025 (plan) | 8,269 | 1,935 | 50 | 10,254 |

- Norilsk Industrial District
- Kola Peninsula Industrial District (Murmansk Region)
- Moscow and other Russian regions

Co-Funded Pension Plan highlights

| Indicators | 2023 | 2024 |
|--|-------|-------|
| Total Company costs, RUB mln | 755.4 | 843.4 |
| Participant's contribution | | |
| Average participant's contribution, % of wages | 4 | 4.3 |
| Average monthly participant's contribution, RUB thousand | 6.8 | 7.9 |
| Company's contribution under the Parity Plan | | |
| Average contribution per participant, % of wages | 3.9 | 4.2 |
| Average monthly contribution per participant, RUB thousand | 6.7 | 7.8 |

Headcount by type of employment, gender, and region (employees)

GRI 2-7, 2-8

| Indicators | 2022 | | | 2023 | | | 2024 | | |
|--|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| | Total | Male | Female | Total | Male | Female | Total | Male | Female |
| Total headcount in Russia as at the latest reporting date | 83,103 | – | – | 83,065 | – | – | 79,817 | – | – |
| Workers who are not employees but whose work is controlled by the Group, as at the latest reporting date | 907 | – | – | 1,013 | – | – | 230 | – | – |
| Permanent employees as at the latest reporting date, including: | 82,196 | 57,930 | 24,266 | 82,052 | 57,708 | 24,344 | 79,587 | 55,769 | 23,818 |
| • in the Norilsk Industrial District | 55,470 | – | – | 55,282 | 40,338 | 14,944 | 53,567 | 38,895 | 14,672 |
| • in the Krasnoyarsk Territory (excluding the NID) | 3,455 | – | – | 3,370 | 2,361 | 1,009 | 3,342 | 2,330 | 1,012 |
| • on the Kola Peninsula (Murmansk Region) | 12,404 | – | – | 12,152 | 8,789 | 3,363 | 11,750 | 8,587 | 3,163 |
| • in Moscow and other regions of Russia | 8,006 | – | – | 8,182 | 3,653 | 4,529 | 7,727 | 3,280 | 4,447 |
| • in the Trans-Baikal Territory | 2,861 | – | – | 3,066 | 2,567 | 499 | 3,201 | 2,677 | 524 |
| Permanent employees working under fixed-term employment contracts (temporary and seasonal jobs) as at the latest reporting date, including: | 4,497 | 2,755 | 1,742 | 4,836 | 3,238 | 1,598 | 3,183 | 1,739 | 1,444 |
| • in the Norilsk Industrial District | 2,709 | – | – | 3,247 | 2,374 | 873 | 2,092 | 1,247 | 845 |
| • in the Krasnoyarsk Territory (excluding the NID) | 116 | – | – | 84 | 53 | 31 | 98 | 55 | 43 |
| • on the Kola Peninsula (Murmansk Region) | 180 | – | – | 202 | 96 | 106 | 205 | 89 | 116 |
| • in Moscow and other regions of Russia | 1,353 | – | – | 1,210 | 646 | 564 | 769 | 341 | 428 |
| • in the Trans-Baikal Territory | 139 | – | – | 93 | 69 | 24 | 19 | 7 | 12 |

| Indicators | 2022 | | | 2023 | | | 2024 | | |
|--|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|---------------|
| | Total | Male | Female | Total | Male | Female | Total | Male | Female |
| Permanent employees working under permanent employment contracts (permanent jobs) as at the latest reporting date, including: | 77,699 | 55,184 | 22,515 | 77,216 | 54,470 | 22,746 | 76,404 | 54,030 | 22,374 |
| • in the Norilsk Industrial District | 52,761 | – | – | 52,035 | 37,964 | 14,071 | 51,475 | 37,648 | 13,827 |
| • in the Krasnoyarsk Territory (excluding the NID) | 3,339 | – | – | 3,286 | 2,308 | 978 | 3,244 | 2,275 | 969 |
| • on the Kola Peninsula (Murmansk Region) | 12,224 | – | – | 11,950 | 8,693 | 3,257 | 11,545 | 8,498 | 3,047 |
| • in Moscow and other regions of Russia | 6,653 | – | – | 6,972 | 3,007 | 3,965 | 6,958 | 2,939 | 4,019 |
| • in the Trans-Baikal Territory | 2,722 | – | – | 2,973 | 2,498 | 475 | 3,182 | 2,670 | 512 |
| Full-time employees as at the latest reporting date, including: | 81,404 | 57,405 | 23,999 | 81,204 | 57,177 | 24,027 | 78,693 | 55,228 | 23,465 |
| • in the Norilsk Industrial District | 54,932 | – | – | 54,732 | 39,942 | 14,790 | 53,005 | 38,502 | 14,503 |
| • in the Krasnoyarsk Territory (excluding the NID) | 3,422 | – | – | 3,336 | 2,348 | 988 | 3,310 | 2,314 | 996 |
| • on the Kola Peninsula (Murmansk Region) | 12,359 | – | – | 12,113 | 8,769 | 3,344 | 11,700 | 8,565 | 3,135 |
| • in Moscow and other regions of Russia | 7,843 | – | – | 7,970 | 3,556 | 4,414 | 7,487 | 3,174 | 4,313 |
| • in the Trans-Baikal Territory | 2,848 | – | – | 3,053 | 2,562 | 491 | 3,191 | 2,673 | 518 |
| Part-time employees as at the latest reporting date, including: | 88 | 27 | 61 | 143 | 44 | 99 | 132 | 35 | 97 |
| • in the Norilsk Industrial District | 3 | – | – | 30 | 15 | 15 | 20 | 11 | 9 |
| • in the Krasnoyarsk Territory (excluding the NID) | 7 | – | – | 11 | 2 | 9 | 6 | 3 | 3 |
| • on the Kola Peninsula (Murmansk Region) | 16 | – | – | 14 | 7 | 7 | 15 | 3 | 12 |
| • in Moscow and other regions of Russia | 58 | – | – | 86 | 20 | 66 | 90 | 18 | 72 |
| • in the Trans-Baikal Territory | 4 | – | – | 2 | 0 | 2 | 1 | 0 | 1 |

Number of new employee hires and terminations (by gender, age, and region of operation) (people)

GRI 401-1 GRI 14.17.3

| Indicators | 2022 | 2023 | 2024 |
|--|---------------|---------------|---------------|
| New employee hires, including: | 20,726 | 13,344 | 13,187 |
| • men | 14,926 | 9,824 | 9,698 |
| • women | 5,800 | 3,520 | 3,489 |
| 29 years old or younger | 7,099 | 5,593 | 4,967 |
| 30 through 44 years old | 9,485 | 5,387 | 5,385 |
| over 45 years | 4,142 | 2,364 | 2,835 |
| • in the Norilsk Industrial District | 14,693 | 8,304 | 7,368 |
| • on the Kola Peninsula (Murmansk Region) | 1,846 | 1,334 | 2,342 |
| • in the Krasnoyarsk Territory (excluding the NID) | 964 | 781 | 807 |
| • in Moscow and other regions of Russia | 2,656 | 1,807 | 1,826 |
| • in the Trans-Baikal Territory | 567 | 1,118 | 844 |
| Number of terminations, including: | 14,281 | 13,484 | 15,473 |
| • men | 10,366 | 9,968 | 11,598 |
| • women | 3,915 | 3,516 | 3,875 |
| 29 years old or younger | 4,032 | 3,941 | 3,790 |
| 30 through 44 years old | 5,546 | 5,336 | 6,394 |
| over 45 years | 4,703 | 4,207 | 5,289 |
| • in the Norilsk Industrial District | 10,416 | 8,399 | 9,088 |
| • on the Kola Peninsula (Murmansk Region) | 1,345 | 1,587 | 2,745 |
| • in the Krasnoyarsk Territory (excluding the NID) | 795 | 863 | 834 |
| • in Moscow and other regions of Russia | 1,308 | 1,724 | 2,031 |
| • in the Trans-Baikal Territory | 417 | 911 | 775 |

Employee turnover rate by region (%)

| Indicators | 2022 | 2023 | 2024 |
|---|------|------|------|
| Kola Peninsula (Murmansk Region) | 10.8 | 13.1 | 23.4 |
| Krasnoyarsk Territory (excluding the NID) | 23.0 | 25.6 | 25.0 |
| Moscow and other regions of Russia | 16.3 | 21.1 | 26.3 |
| Norilsk Industrial District (NID) | 18.8 | 15.2 | 17.0 |
| Trans-Baikal Territory | 14.6 | 29.7 | 24.2 |

Employee recruitment rate by region (%)

| Indicators | 2022 | 2023 | 2024 |
|---|------|------|------|
| Kola Peninsula (Murmansk Region) | 14.9 | 11.0 | 19.9 |
| Krasnoyarsk Territory (excluding the NID) | 27.9 | 23.2 | 24.1 |
| Moscow and other regions of Russia | 32.8 | 22.1 | 23.6 |
| Norilsk Industrial District (NID) | 26.5 | 15.0 | 13.8 |
| Trans-Baikal Territory | 19.8 | 36.5 | 26.4 |

Employee turnover rate by gender and age (%)

| Indicators | 2022 | 2023 | 2024 |
|---|------|------|------|
| Total turnover rate | 17.4 | 16.4 | 19.4 |
| Male turnover rate | 17.9 | 17.3 | 20.8 |
| Female turnover rate | 16.1 | 14.4 | 16.3 |
| Turnover rate for employees 29 years old or younger | 32.3 | 32.6 | 33.4 |
| Turnover rate for employees 30 through 44 years old | 13.1 | 12.8 | 16.0 |
| Turnover rate for employees over 45 years old | 17.1 | 14.9 | 18.7 |

Employee recruitment rate by gender and age (%)

| Indicators | 2022 | 2023 | 2024 |
|--|------|------|------|
| Total recruitment rate | 25.2 | 16.3 | 16.6 |
| Male recruitment rate | 25.8 | 17.0 | 17.4 |
| Female recruitment rate | 23.9 | 14.5 | 14.6 |
| Recruitment rate for employees 29 years old or younger | 63.2 | 46.3 | 43.8 |
| Recruitment rate for employees 30 through 44 years old | 25.3 | 12.9 | 13.5 |
| Recruitment rate for employees over 45 years old | 16.6 | 8.3 | 10.0 |

Number of employees on maternity and/or childcare leave and employees who returned to work after maternity and/or childcare leave

GRI 401-3 GRI 14.17.5, 14.21.3

| Indicators | 2022 | 2023 | 2024 |
|---|-------|-------|-------|
| Employees on maternity and/or childcare leave as at the year-end, including: | 1,526 | 1,557 | 1,609 |
| • men | 69 | 91 | 143 |
| • women | 1,457 | 1,466 | 1,466 |
| Employees who returned to work after maternity and/or childcare leave during the year, including: | 592 | 623 | 1,108 |
| • men | 39 | 61 | 431 |
| • women | 553 | 562 | 677 |

Assessment of Group employees in Russia (% of average headcount)

GRI 404-3

| Indicators | 2022 | | | | 2023 | | | | 2024 | | | |
|---|-----------------------|------------------------|----------|---------------|-----------------------|------------------------|----------|---------------|-----------------------|------------------------|----------|---------------|
| | Blue-collar employees | White-collar employees | Managers | Group's total | Blue-collar employees | White-collar employees | Managers | Group's total | Blue-collar employees | White-collar employees | Managers | Group's total |
| Management and soft skills assessment | | | | | | | | | | | | |
| Percentage of employees covered by skills assessment | 0.6 | 22.4 | 47.5 | 12.6 | 2.3 | 40.4 | 45.5 | 17.8 | 3.3 | 32.2 | 50.3 | 17.6 |
| Percentage of male employees covered by skills assessment | 0.6 | 25.6 | 43.7 | 11.1 | 2.3 | 34.3 | 43.8 | 14.1 | 3.2 | 30.4 | 49.5 | 15.1 |
| Percentage of female employees covered by skills assessment | 0.6 | 19.7 | 58.8 | 19.0 | 2.6 | 45.9 | 50.4 | 27.1 | 4.1 | 33.9 | 53.5 | 23.9 |
| Hard skills assessment | | | | | | | | | | | | |
| Percentage of employees covered by skills assessment | 0.7 | 19.7 | 36.3 | 10.0 | 2.0 | 23.7 | 21.5 | 9.9 | 0.1 | 14.2 | 18.8 | 6.4 |
| Percentage of male employees covered by skills assessment | 0.8 | 25.3 | 38.0 | 10.0 | 2.3 | 28.5 | 24.4 | 9.9 | 0.2 | 15.3 | 21.6 | 6.1 |
| Percentage of female employees covered by skills assessment | 0.2 | 17.9 | 31.1 | 9.9 | 0.6 | 19.2 | 13.0 | 9.9 | 0.01 | 13.2 | 8.4 | 6.9 |
| Assessment of KPI performance | | | | | | | | | | | | |
| Percentage of employees covered by assessment of KPI performance | 0.04 | 60.1 | 59.5 | 22.1 | 0 | 62.2 | 60.7 | 23.6 | 0 | 59.3 | 66.9 | 24.4 |
| Percentage of male employees covered by assessment of KPI performance | 0.02 | 56.0 | 54.3 | 16.6 | 0 | 58.8 | 57.2 | 18.4 | 0 | 56.2 | 60.6 | 19.1 |
| Percentage of female employees covered by assessment of KPI performance | 0.1 | 63.7 | 75.4 | 35.9 | 0 | 65.3 | 70.7 | 36.7 | 0 | 62.1 | 90.2 | 38.0 |

Key work-related injury and ill health rates by gender in 2022–2024

GRI 403-9, 403-10 / UNCTAD C.3.2 / MED-29 GRI 14.16.10, 14.16.11

| Indicators ¹ | 2022 | 2023 | 2024 |
|---|-------|-------|-------------------|
| Fatalities as a result of work-related injury, including: | 4 | 5 | 3 |
| • men | 3 | 5 | 3 |
| • women | 1 | 0 | 0 |
| FIFR | 0.034 | 0.042 | 0.025 |
| Lost time work-related injuries, including: | 67 | 78 | 75 ² |
| • men | 57 | 69 | 65 |
| • women | 10 | 9 | 10 |
| LTIFR | 0.58 | 0.65 | 0.64 ² |
| Rate of high-consequence work-related injuries | 0.11 | 0.12 | 0.10 |

¹ For the Norilsk Nickel Group.

² Excluding one accident until its work-related status and severity are determined.

| Indicators | 2022 | 2023 | 2024 |
|---|-------|-------|-----------------|
| Total number of recordable work-related injuries under Russian labour laws (minor + high-consequence + fatal), including: | 71 | 83 | 78 ¹ |
| • men | 60 | 74 | 68 |
| • women | 11 | 9 | 10 |
| High-consequence injuries, including: | 13 | 15 | 12 |
| • men | 11 | 15 | 12 |
| • women | 2 | 0 | 0 |
| Cases of work-related ill health, including: | 174 | 145 | 139 |
| • men | 156 | 131 | 128 |
| • women | 18 | 14 | 11 |
| Rate of work-related ill health | 1.49 | 1.21 | 1.18 |
| Lost-day rate | 20.75 | 23.21 | 19.52 |
| Absentee rate ² | 3.57 | 3.77 | 3.94 |
| Injury rate ³ | 0.61 | 0.69 | 0.66 |
| Hours worked, mln hours | 116.5 | 120.1 | 117.9 |
| Total number of recordable work-related injuries among contractor employees working at the Group's facilities, under Russian labour laws: | 46 | 32 | 31 |
| • men | 43 | 27 | 26 |
| • women | 3 | 5 | 5 |
| Including fatalities, of which: | 4 | 7 | 1 |
| • men | 4 | 7 | 1 |
| • women | 0 | 0 | 0 |
| Lost time work-related injuries, including: | – | – | 30 |
| • men | – | – | 25 |
| • women | – | – | 5 |
| Number of high-consequence cases by contractor, including: | – | – | 6 |
| • men | – | – | 6 |
| • women | – | – | 0 |
| Injury rate | – | – | 0.54 |
| Rate of high-consequence work-related injuries | – | – | 0.1 |
| FIFR | – | – | 0.017 |
| LTIFR | – | – | 0.52 |
| Number of hours worked among contractor employees working at the Group's facilities, mln hours | – | – | 57.7 |

¹ Excluding one accident until its work-related status and severity are determined.

² The absentee rates for Moscow and other regions exclude a health resort in Sochi.

³ The injury rate is calculated per million hours worked and takes into account the number of individuals affected by work-related lost-time injuries or fatalities.

Employees and contractors covered by the corporate occupational health management system (OHMS)

GRI 403-8 GRI 14.16.9

| Indicators | OHMS coverage | Including the OHMS that underwent an internal audit | Including OHMS that underwent an external audit or another independent review |
|---|---------------|---|---|
| Headcount of the Group's business units with the OHMS in place | 78,376 | 54,749 | 40,793 |
| Percentage of employees across the Group's business units covered by the OHMS in the Group's total headcount, % | 100 | 70 | 52 |
| Headcount of contractor employees working at the Group's facilities and covered by the OHMS | 27,266 | 22,296 | 17,675 |
| Percentage of contractor employees covered by the OHMS in the contractors' total headcount, % | 100 | 82 | 65 |



Fines and non-monetary sanctions related to environmental and social impacts in 2024

GRI 2-27 / UNCTAD D.2.1

| Indicators | Total number of instances of non-compliance with laws and/or regulations during the reporting period | Number of instances of non-compliance with laws and/or regulations during the reporting period: instances for which fines were imposed | Number of instances of non-compliance with laws and/or regulations during the reporting period: instances for which non-monetary sanctions were imposed | Total number of fines for instances of non-compliance with laws and/or regulations that were paid during the reporting period | Including fines for instances of non-compliance with laws and/or regulations that occurred in the current reporting period | Including fines for instances of non-compliance with laws and/or regulations that occurred in previous reporting periods | Total monetary value of fines that were paid during the reporting period (RUB) | Including fines that were imposed during the reporting period (RUB) | Including fines that were imposed in previous reporting periods (RUB) |
|---|--|--|---|---|--|--|--|---|---|
| Total fines and non-monetary sanctions | 752 | 373 | 379 | 373 | 361 | 12 | 23,964,617 | 21,047,117 | 2,917,500 |
| Environmental laws and regulations | 56 | 18 | 38 | 18 | 16 | 2 | 2,100,000 | 1,400,000 | 700,000 |
| Non-compliance with labour laws | 7 | 3 | 4 | 3 | 3 | 0 | 130,000 | 130,000 | 0 |
| Non-compliance with occupational health and safety laws | 81 | 49 | 32 | 48 | 48 | 0 | 3,825,000 | 3,825,000 | 0 |
| Non-compliance with regulations on the impact of products and services on occupational health and safety | 1 | 0 | 1 | 0 | 0 | 0 | 0 | 0 | 0 |
| Non-compliance with consumer protection laws, including with respect to product information and labelling | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Non-compliance with marketing (advertising) regulations | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 |
| Anti-competitive behaviour and breach of antitrust laws | 1 | 1 | 0 | 1 | 1 | 0 | 5,000 | 5,000 | 0 |
| Failure to timely comply with the improvement notices issued by supervisory authorities | 24 | 21 | 3 | 23 | 21 | 2 | 7,980,000 | 7,310,000 | 670,000 |
| Non-compliance with fire safety requirements | 17 | 2 | 15 | 2 | 2 | 0 | 150,000 | 150,000 | 0 |
| Breach of sanitary and epidemiological laws unrelated to product requirements | 19 | 4 | 15 | 4 | 3 | 1 | 60,000 | 30,000 | 30,000 |
| Breach of capital construction laws | 89 | 28 | 61 | 29 | 26 | 3 | 3,207,500 | 2,880,000 | 327,500 |
| Breach of industrial safety laws | 195 | 48 | 147 | 47 | 46 | 1 | 4,906,000 | 4,806,000 | 100,000 |
| Breach of transportation security laws | 12 | 3 | 9 | 3 | 3 | 0 | 3,000 | 3,000 | 0 |
| Other grounds | 250 | 196 | 54 | 195 | 192 | 3 | 1,598,117 | 508,117 | 1,090,000 |

SASB Metals & Mining content index

| Topic | SASB code | Metric | Disclosure | Page/Link | Comment |
|--|---------------|---|---------------|---|---|
| Greenhouse Gas Emissions | EM-MM-110a.1 | Gross global Scope 1 emissions | Full | Greenhouse Gas Emissions section | – |
| | | Percentage covered under emissions-limiting regulations | | – | No emissions-limiting regulations are imposed in Russia |
| | EM-MM-110a.2 | Discussion of long- and short-term strategies or plans to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets | Full | Climate Change and Sustainable Growth Strategy sections | – |
| Air Quality | EM-MM-120a.1 | Air emissions of the following pollutants: | | | |
| | | CO | Full | Air section | Carbon oxide emissions stood at 11,588.7 t in 2024 |
| | | NO _x (excluding N ₂ O) | | | Nitrogen oxide emissions (expressed as NO ₂) amounted to 6,138 t in 2024 |
| | | SO _x | | | Sulphur dioxide emissions stood at 1,269,019.8 t in 2024 |
| | | Particulate matter (PM10) | | | Emissions of particulate matter amounted to 11,002.4 t in 2024 |
| | | Mercury (Hg) | | | There were no air emissions of mercury in 2024 |
| | | Lead (Pb) | | | Air emissions of lead and its inorganic compounds (expressed as lead) stood at 8.37 t in 2024 |
| | | Volatile organic compounds (VOCs) | | | Emissions of volatile organic compounds amounted to 2,471.5 t in 2024 |
| Energy Management | EM-MM-130a.1 | Total energy consumed | Full | Energy Consumption and Energy Efficiency section | 139,574 TJ (including purchase and sale of energy within the Group) 140,254 TJ (including purchase and sale of energy outside the Group) |
| | | Percentage of grid electricity | | | The Company discloses the share of purchased electricity (including resold electricity) as a percentage of total energy consumption (6%) |
| | | Percentage of renewable energy | | | 11.9% |
| Water Management | EM-MM-140a.1 | Total water withdrawn | Partial | GRI Quantitative Indicators Disclosure appendix | 321.2 Mcm |
| | | Total water consumed | | GRI Content Index appendix | Water consumption according to the GRI methodology – 67.8 Mcm. The calculation does not exclude water withdrawn and discharged at different water management sites as the Group does not keep such records |
| | | Percentage of total water withdrawn and consumed in regions with high or extremely high baseline water stress | | | There are no Group entities that withdraw or consume significant volumes of water in regions with high or extremely high baseline water stress |
| | EM-MM-140a.2 | Number of incidents of non-compliance associated with water quality permits, standards, and regulations | Not disclosed | – | – |
| Waste & Hazardous Materials Management | EM-MM-150a.4 | Total weight of non-mineral waste generated | Full | GRI Quantitative Indicators Disclosure appendix | 801,143 t |
| | EM-MM-150a.5 | Total weight of tailings produced | Full | | 31,433,572 t |
| | EM-MM-150a.6 | Total weight of waste rock generated | Full | Waste and Tailings Storage Facilities section | 137,655,146 t |
| | EM-MM-150a.7 | Total weight of hazardous waste generated | Full | | 7,023 t (hazard classes 1–3) |
| | EM-MM-150a.8 | Total weight of hazardous waste recycled | Partial | | 11,769 t (waste management methods, including reuse, are determined as per statistical reporting form 2-TP (waste)) |
| | EM-MM-150a.9 | Number of significant incidents associated with hazardous materials and waste management | Full | | There were no significant incidents associated with hazardous materials and waste management in 2024 |
| | EM-MM-150a.10 | Description of waste and hazardous materials management policies and procedures for active and inactive operations | Full | | – |

| Topic | SASB code | Metric | Disclosure | Page/Link | Comment |
|--|--------------|--|------------|--|--|
| Biodiversity Impacts | EM-MM-160a.1 | Description of environmental management policies and practices for active sites | Full | Environmental Management section | – |
| | EM-MM-160a.2 | Percentage of mine sites where acid rock drainage is: predicted to occur actively mitigated under treatment or remediation | Full | – | 0% At Norinickel's key production sites (in the Norilsk Industrial District, Murmansk Region, and Trans-Baikal Territory), no acid rock drainage is predicted to occur, actively mitigated, or under treatment or remediation |
| | EM-MM-160a.3 | Percentage of proved reserves in or near sites with protected conservation status or endangered species habitat Percentage of probable reserves in or near sites with protected conservation status or endangered species habitat | Full | – | 0% None of the Group's deposits (ore occurrences) are located in or near (within 5 km) sites with protected conservation status or endangered species habitat |
| Security, Human Rights, & Rights of Indigenous Peoples | EM-MM-210a.1 | Percentage of proved reserves in or near areas of conflict Percentage of probable reserves in or near areas of conflict | Full | – | 0% The Group's deposits (ore occurrences) are not located in or near areas of conflict |
| | EM-MM-210a.2 | Percentage of proved reserves in or near indigenous land Percentage of probable reserves in or near indigenous land | Full | – | 0% The Group's deposits (ore occurrences) are not located in or near (within 5 km) indigenous land ¹ |
| | 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 | Engagement with Indigenous Peoples and Respect for Human Rights sections | – |
| Community Relations | EM-MM-210b.1 | Discussion of process to manage risks and opportunities associated with community rights and interests | Full | Contribution to the Development of Local Communities, Engagement with Indigenous Peoples, and Improving the Well-Being of Local Communities sections | – |
| | EM-MM-210b.2 | Number of non-technical delays Duration of non-technical delays | Full | – | There were no such delays |
| Labour Practices | EM-MM-310a.1 | Percentage of active workforce employed under collective agreements | Full | Norinickel's HR Strategy section | 94.3% of Group employees are covered by collective bargaining agreements |
| | EM-MM-310a.2 | Number of strikes and lockouts Duration of strikes and lockouts Explanations regarding strikes and lockouts that occurred | Full | Norinickel's HR Strategy section | There were no such incidents |
| Workforce Health & Safety | EM-MM-320a.1 | ALL-incidence rate: among employees of Russian business units | Partial | Work-Related Injuries and H&S Training sections | 0.66 The rate is calculated for all employees of the Group's Russian business units per million hours worked and takes into account the number of individuals affected by work-related lost-time injuries or fatalities |
| | | among contractor employees | | | 0.54 |
| | | Fatality rate (FIFR): among employees of Russian business units | | | FIFR = 0.025 The rate is calculated for all employees of the Group's Russian business units per million hours worked |
| | | among contractor employees | | | FIFR = 0.017 |
| | | Near miss frequency rate | | | Not disclosed |
| | | Average hours of health, safety, and emergency response training for (a) direct employees (b) contract employees | | | (a) 55 h – average time spent on pre-certification and health and safety training per employee (b) Not disclosed |

¹ Sector disclosure, GRI 14.11.3.

| Topic | SASB code | Metric | Disclosure | Page/Link | Comment | | |
|--|--------------|---|-------------|---|--|---|--------|
| Business Ethics & Transparency | EM-MM-510a.1 | Description of the management system for prevention of corruption and bribery throughout the value chain | Full | Business Ethics and Anti-Corruption section | – | | |
| | EM-MM-510a.2 | Production in countries that have the 20 lowest rankings in Transparency International's Corruption Perception Index | Full | – | There are no operations in such countries | | |
| Tailings Storage Facilities Management | EM-MM-540a.1 | Tailings storage facility inventory table | Full | Waste and Tailings Storage Facilities section | – | | |
| | EM-MM-540a.2 | Summary of tailings management systems and governance structure used to monitor and maintain the stability of tailings storage facilities | Full | GRI Quantitative Indicators Disclosure appendix | – | | |
| | EM-MM-540a.3 | Approach to development of Emergency Preparedness and Response Plans (EPRPs) for tailings storage facilities | Full | – | – | | |
| Activity Metric | EM-MM-000.A | Production | Full | – | The Company does not produce ore for sale | | |
| | | Production of metal ores | | | | | |
| | | Production of finished metal products: | | | | | |
| | | nickel | | | | Key Figures section (for more details, please see Nornickel's 2024 Annual Report) | 205 kt |
| | | copper | | | | | 433 kt |
| | palladium | | 2,761.6 koz | | | | |
| | platinum | | 667.6 koz | | | | |
| | EM-MM-000.B | Total number of employees | Partial | Nornickel's HR Strategy section | 79,587 permanent employees – headcount as at the latest reporting date | | |
| | | Percentage of contractor employees | | GRI Quantitative Indicators Disclosure appendix | Percentage of contractor employees is not disclosed | | |

Indicators under the UNCTAD Guidance on core indicators for entity reporting on contribution towards implementation of the UN SDGs

| UNCTAD indicator | Page | Disclosure status | Information/Comments | | |
|---|--|--|----------------------|--|--|
| Contextual information | | | | | |
| Location of the organisation's headquarters | 19 | Disclosed | – | | |
| Countries where the entity operates | 19 | Disclosed | – | | |
| Nature of ownership | 307 | Disclosed | – | | |
| Legal form | 3 | Disclosed | – | | |
| Markets served | 17 | Disclosed | – | | |
| Significant changes during the reporting period | 298 | Disclosed | – | | |
| A. Economic area | | | | | |
| A.1. Revenue and/or (net) value added | A.1.1. Revenue | 15 | Disclosed | RUB 1,166.2 bn | |
| | A.1.2. Value added | – | Disclosed | RUB 720.6 bn | |
| | A.1.3. Net value added | – | Disclosed | RUB 621.2 bn | |
| A.2. Payments to the Government | A.2.1. Taxes and other payments to the Government | 137 | Disclosed | In 2024, tax and non-tax payments totalled RUB 248.6 bn | |
| A.3. New investment/expenditures | A.3.1. Green investment | Green investment in absolute terms | 227 | Disclosed | RUB 4.7 bn – the cost of CAPEX projects to expand electricity and heat generation capacity, as well as power grids and heat networks |
| | | Green investment in percentage terms | – | Disclosed | These expenditures make up 0.8% of the net value added for the reporting year |
| | A.3.2. Community investment | Community investment in absolute terms | – | Disclosed | RUB 9.7 bn – expenditures on charitable activities, including philanthropy and social investments and programmes (RUB 14.0 bn – charity expenses and RUB (4.2) bn – changes in estimates of liabilities under long-term agreements (social programmes)), or 1.6% of the net value added for the reporting year |
| | Community investment in percentage terms | – | Disclosed | – | |
| | A.3.3. Expenditures on research and development | 275 | Disclosed | RUB 192.7 mln – expenditures on R&D projects aimed at updating the Norilsk Nickel Group's Development Strategy, expanding production, and protecting the environment | |
| | Expenditures on research and development in percentage terms | – | Disclosed | These expenditures make up 0.02% of the net value added for the reporting year | |

¹ Recovered and treated onsite and by third parties.

| UNCTAD indicator | Page | Disclosure status | Information/Comments | | |
|---|--|--|--|---|---|
| A.4. Local supplier/purchasing programmes | 269 | Partially disclosed | Data are collected for procurement of materials and equipment only. Centralised tracking by supplier location is not maintained for other procurement categories. RUB 186.1 mln – procurement from Russian suppliers and contractors outside the Group (98% of the Company's procurement budget for the reporting year) | | |
| B. Environmental area | | | | | |
| B.1. Sustainable use of water | B.1.1. Water recycling and reuse | Water recycled and reused in absolute terms | 185, 327 | Disclosed | The volume of water recycled and reused in absolute terms decreased from 1,067.8 Mcm in 2023 to 991.8 Mcm in 2024 |
| | | Water recycled and reused in percentage terms | – | Disclosed | Percentage of water recycled and reused in total water withdrawal decreased from 339% to 311% |
| | B.1.2. Water use efficiency | Water withdrawal in absolute terms | 185, 325 | Disclosed | Water withdrawal increased from 315.0 Mcm in 2023 to 321.2 Mcm in 2024 |
| | Water withdrawal in percentage terms | – | Disclosed | The ratio of water withdrawal to the net value added increased from 0.4 thousand m ³ to 0.5 thousand m ³ /RUB 1 mln | |
| | B.1.3. Water stress | 185 | Disclosed | No water is withdrawn in water-stressed or water-scarce areas | |
| B.2. Waste management | B.2.1. Waste generation | Waste generated in absolute terms | 331 | Disclosed | Waste generation decreased from 176.9 mln t in 2023 to 174.2 mln t in 2024 |
| | | Waste generated in percentage terms | – | Disclosed | The ratio of waste generated to the net value added increased from 240.8 t to 280.5 t/RUB 1 mln |
| | B.2.2. Waste reused, remanufactured, and recycled | Waste reused, remanufactured, and recycled in absolute terms | 331 | Disclosed | Waste reused, remanufactured, and recycled ¹ in absolute terms decreased from 33.9 mln t in 2023 to 29.6 mln t in 2024 |
| | Waste reused, remanufactured, and recycled in percentage terms | – | Disclosed | The ratio of waste reused, remanufactured, and recycled to the net value added increased from 46.1 t to 47.7 t/RUB 1 mln | |
| B.2.3. Hazardous waste generation | Hazardous waste generation in absolute terms | 331 | Disclosed | Hazard classes 1–3 waste generation decreased from 8,086 t in 2023 to 7,023 t in 2024. | |
| | Hazardous waste generation in percentage terms | – | Disclosed | The ratio of such waste generation to the net value added remained flat at 0.011 t/RUB 1 mln in 2023–2024 | |
| | Proportion of hazardous waste | – | Disclosed | Proportion of hazard classes 1–3 waste in the total waste generated in 2024: <ul style="list-style-type: none"> • Processed and recovered onsite: 0.02% • Treated onsite: 36.3% • Transferred for processing and recovery: 0.2% • Transferred for treatment: 43.6% | |

| UNCTAD indicator | Page | Disclosure status | Information/Comments |
|---|--|-------------------|---|
| B.3. Greenhouse gas emissions | B.3.1. Greenhouse gas emissions (Scope 1) | 222 | Disclosed |
| | Greenhouse gas emissions (Scope 1) in absolute terms | | Greenhouse gas emissions (Scope 1) in absolute terms totalled 8.2 mln t of CO ₂ equivalent (including 1.1 mln t of CO ₂ equivalent from electricity and heat supply to households in the regions of operation and 1.2 mln t of CO ₂ equivalent as a provision for emissions from the Sulphur Project) |
| | Greenhouse gas emissions (Scope 1) in percentage terms | | The ratio of greenhouse gas emissions (Scope 1) to the net value added increased from 11 t of CO ₂ equivalent to 13 t of CO ₂ equivalent/RUB 1 mln |
| B.3.2. Greenhouse gas emissions (Scope 2) | Greenhouse gas emissions (Scope 2) in absolute terms | 222 | Disclosed |
| | Greenhouse gas emissions (Scope 2) in percentage terms | | Greenhouse gas emissions (Scope 2) in absolute terms remained flat at 0.4 mln t of CO ₂ equivalent |
| | | | The ratio of greenhouse gas emissions (Scope 2) to the net value added increased from 0.6 t of CO ₂ equivalent to 0.7 t of CO ₂ equivalent/RUB 1 mln |
| B.4. Ozone-depleting substances and chemicals | B.4.1. Ozone-depleting substances and chemicals dependency | – | Disclosed |
| | | | The emissions are insignificant |
| B.5. Energy consumption | B.5.1. Share of renewable energy in total energy consumption | 229 | Partially disclosed |
| | | | The Report discloses the amount of electricity 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 the UNCTAD guidelines. Along with in-house generation, the Norilsk Nickel Group purchases electric power from third parties connected to Russia's unified energy system. |
| | Renewable energy consumption in percentage terms | | 11.9% – share of renewable energy |
| | B.5.2. Energy efficiency | – | Disclosed |
| | | | The ratio of renewable energy to the net value added was 0.02 TJ/RUB 1 mln in 2023–2024 |
| | In 2024, the ratio of the Group's total energy consumption to the net value added was 0.2 TJ/RUB 1 mln | | |
| B.6. Land and biodiversity | B.6.1. Land used adjacent to biodiversity sensitive areas | 199 | Disclosed |
| | | | The Company has no sites in protected areas or areas of high biodiversity value |
| C. Social area | | | |
| C.1. Gender equality | C.1.1. Share of women in managerial positions | 72 | Disclosed |
| | | | 22% – proportion of women in managerial positions |

| UNCTAD indicator | Page | Disclosure status | Information/Comments |
|--|---|-------------------|--|
| C.2. Human capital | C.2.1. Hours of employee training | 87 | Disclosed |
| | | | Average hours of training per year per employee: <ul style="list-style-type: none"> • All employee categories – 126 h • Blue-collar employees – 142 h • Managers – 141 h • White-collar employees – 80 h |
| | C.2.2. Expenditure on employee training | 88 | Disclosed |
| | | | Expenditure on employee training per year per employee: <ul style="list-style-type: none"> • RUB 16.3 thousand – all employee categories • Blue-collar employees – RUB 12 thousand • Managers – RUB 30 thousand • White-collar employees – RUB 15 thousand |
| | C.2.3. Employee wages and benefits | 81 | Partially disclosed |
| | | | According to the consolidated financial statements, staff costs amounted to RUB 248,029 mln in 2024, or 40% of the net value added. |
| | | | There is no statistics on the benefits broken down by labour contract type, employment type, age, or gender |
| C.3. Employee health and safety | C.3.1. Expenditures on employee health and safety | 119 | Disclosed |
| | | | Expenditures on employee health and safety make up 3% of the net value added |
| | C.3.2. Incidence rate of occupational injuries | 341 | Partially disclosed |
| | | | The Report discloses information about the occupational injury rate and lost day rate in accordance with the GRI requirements |
| C.4. Coverage by collective agreements | C.4.1. Share of employees covered by collective agreements | 77 | Disclosed |
| | | | 94.3% of Group employees are covered by collective bargaining agreements |
| D. Institutional area | | | |
| D.1. Corporate governance disclosure | D.1.1. Number of board meetings and attendance rate | 234 | Disclosed |
| | | | 27 Board meetings. Attendance rate – 99% |
| | D.1.2. Number and share of female board members | 233 | Disclosed |
| | | | 31% of Board members are female (4 out of 13) |
| | D.1.3. Board members by age range | 233 | Disclosed |
| | | | Board members by age: <ul style="list-style-type: none"> • 35–50 years – 31% • 51–59 years – 54% • Over 60 years – 15% |
| | D.1.4. Number of meetings of the audit committee and the attendance rate | – | Disclosed |
| | | | 12 meetings of the Audit Committee of the Board of Directors of MMC Norilsk Nickel |
| | | | Attendance rate – 100% |
| | D.1.5. Compensation: total compensation per board member (both executive and non-executive directors) | – | Disclosed |
| | | | Compensation paid to the members of the Board of Directors in the reporting year was RUB 29.3 mln per Board member as at 31 December of the reporting year |

| UNCTAD indicator | | Page | Disclosure status | Information/Comments |
|--------------------------------|---|--|-------------------|---|
| D.2. Anti-corruption practices | D.2.1. Corruption incidence | Confirmed incidents of corruption 256, 344 | Disclosed | Five incidents |
| | D.2.2. Management training on anti-corruption | Number of managers who have received training in the area of anti-corruption issues 258 | Disclosed | 1,210 managers have received training in the area of anti-corruption issues |
| | | Percentage of managers who have received training in the area of anti-corruption issues | | |

TCFD disclosures

| Section | Disclosure | Page | Assured by the auditor |
|--|---|-------------------------|------------------------|
| G – Governance Disclose the organisation's governance around climate-related risks and opportunities | Ga) Describe the board's oversight of climate-related risks and opportunities | 211 | Assured |
| | Gb) Describe management's role in assessing and managing climate-related risks and opportunities | 211 | Assured |
| S – Strategy Disclose the actual and potential impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning | Sa) Describe the climate-related risks and opportunities the organisation has identified over the short, medium, and long term | 216 | Not assured |
| | Sb) Describe the impact of climate-related risks and opportunities on the organisation's businesses, strategy, and financial planning | 37, 216 | Assured |
| | Sc) Describe the resilience of the organisation's strategy, taking into consideration different climate-related scenarios, including a 2 °C or lower scenario | 37, 216 | Assured |
| R – Risk Management Describe how the organisation identifies, assesses, and manages climate-related risks | Ra) Describe the organisation's processes for identifying and assessing climate-related risks | 216 | Not assured |
| | Rb) Describe the organisation's processes for managing climate-related risks | 216 | Assured |
| | Rc) Describe how processes for identifying, assessing, and managing climate-related risks are integrated into the organisation's overall risk management | 240 | Assured |
| M – Metrics and Targets Disclose the metrics and targets used to assess and manage relevant climate-related risks and opportunities where such information is material | Ma) Disclose the metrics used by the organisation to assess climate-related risks and opportunities in line with its strategy and risk management process | 39, 212 | Assured |
| | Mb) Disclose Scope 1, Scope 2, and, if appropriate, Scope 3 greenhouse gas (GHG) emissions, and the related risks | 39, 222 | Assured |
| | Mc) Describe the targets used by the organisation to manage climate-related risks and opportunities and performance against targets | 39, 212 | Assured |

Pilot disclosure under TNFD Recommendations

| Section | Disclosure | Page | Comment |
|---|--|---|--|
| G – Governance Disclose the organisation's governance of nature-related dependencies, impacts, risks, and opportunities | Ga) Describe the board's oversight of nature-related dependencies, impacts, risks, and opportunities | 30, 31, 39, 179, 211, 234 | |
| | Gb) Describe management's role in assessing and managing nature-related dependencies, impacts, risks, and opportunities | 32, 179, 211, 234 | |
| | Gc) Describe the organisation's human rights policies and engagement activities, and oversight by the board and management, with respect to indigenous peoples, local communities, affected and other stakeholders, in the organisation's assessment of, and response to, nature-related dependencies, impacts, risks, and opportunities | 61, 63, 151, 152, 155, 246, 250 | |
| S – Strategy Disclose the effects of nature-related dependencies, impacts, risks, and opportunities on the organisation's business model, strategy, and financial planning where such information is material | Sa) Describe the nature-related dependencies, impacts, risks, and opportunities the organisation has identified over the short, medium, and long term | 200, 216, 239 | |
| | Sb) Describe the effect nature-related dependencies, impacts, risks, and opportunities have had on the organisation's business model, value chain, strategy, and financial planning, as well as any transition plans or analysis in place | 37, 39, 201, 202, 203, 216 | The Company determines a list of mitigation measures and relevant implementation costs, which is taken into account in budget planning. The Company does not currently expect any significant investments or divestitures as a result of identified nature-related risks and opportunities related to environmental aspects |
| | Sc) Describe the resilience of the organisation's strategy to nature-related risks and opportunities, taking into consideration different scenarios | 37, 216 | The impact of climate-related risks on the Company's financial performance is assessed in the short term (the result is published as part of consolidated financial statements), as well as in the long term (the result is published as part of the Climate Change Report) |
| | Sd) Disclose the locations of assets and/or activities in the organisation's direct operations and, where possible, upstream and downstream value chain(s) that meet the criteria for priority locations | 200 | All production sites of the Polar and Trans-Baikal Divisions and generating facilities of the Energy Division are classified as significant locations |

| Section | Disclosure | Page | Comment |
|--|--|---|---|
| R – Risk and Impact Management Describe the processes used by the organisation to identify, assess, prioritise, and monitor nature-related dependencies, impacts, risks, and opportunities | Ra(i) Describe the organisation's processes for identifying, assessing, and prioritising nature-related dependencies, impacts, risks, and opportunities in its direct operations | 200, 201, 216, 239, 264 | The processes for identifying, assessing, and prioritising nature-related dependencies, impacts, risks, and opportunities in the upstream and downstream value chain(s) are under development |
| | Ra(ii) Describe the organisation's processes for identifying, assessing, and prioritising nature-related dependencies, impacts, risks, and opportunities in its upstream and downstream value chain(s) | | |
| | Rb) Describe the organisation's processes for managing nature-related dependencies, impacts, risks, and opportunities | 176, 216, 239 | |
| | Rc) Describe how processes for identifying, assessing, prioritising, and monitoring nature-related risks are integrated into and inform the organisation's overall risk management processes | 216, 239 | |
| M – Metrics and Targets Disclose the metrics and targets used to assess and manage material nature-related dependencies, impacts, risks, and opportunities | Ma) Disclose the metrics used by the organisation to assess and manage material nature-related risks and opportunities in line with its strategy and risk management process | 39, 176 | |
| | Mb) Disclose the metrics used by the organisation to assess and manage dependencies and impacts on nature | 39, 176 | |
| | Mc) Describe the targets and goals used by the organisation to manage nature-related dependencies, impacts, risks, and opportunities and its performance against these | 39 | |

Disclosure under Order of the Russian Ministry of Economic Development No. 764 dated 1 November 2023¹

| No. | Disclosure | Unit of measurement | 2022 | 2023 | 2024 | Source | Comment |
|----------------------------|---|---------------------|---------|---------|----------------|--|--|
| Economic indicators | | | | | | | |
| 1 | Revenue | RUB bn | 1,184.5 | 1,231.7 | 1,166.2 | 2024 Sustainability Report, page 15 | – |
| 2 | Added value | RUB bn | 892.3 | 822.0 | 714.0 | – | – |
| 3 | Net added value | RUB bn | 817.5 | 731.2 | 614.7 | – | – |
| 4 | Total expenditure on research and development | RUB mln | 84.3 | 198.9 | 192.7 | 2024 Sustainability Report, page 275 | Includes R&D projects aimed at updating the Group's Development Strategy, expanding production, and protecting the environment |
| 5 | Labour productivity | RUB mln/person | 11.4 | 10.3 | 9.1 | – | Labor productivity is calculated as the ratio of value added to the average headcount (employees in the Russian Federation) |
| 6 | Total mandatory payments accrued (excluding fines and penalties), including: | RUB bn | – | – | – | – | The indicator is not disclosed. The Company will consider disclosing this information within three years |
| | • taxes and levies | RUB bn | – | – | – | – | |
| | • insurance contributions | RUB bn | – | – | – | – | |
| | • other mandatory payments | RUB bn | – | – | – | – | |
| 7 | Total mandatory payments paid (excluding fines and penalties), including: | RUB bn | 262 | 281 | 249 | 2024 Sustainability Report, page 137 | – |
| | • taxes and levies | RUB bn | – | – | – | – | – |
| | • insurance contributions | RUB bn | – | – | – | – | – |
| | • other mandatory payments | RUB bn | – | – | – | – | – |
| 8 | Domestically sourced goods, works, and services in total procurement of goods, work, and services | % | 95 | 99 | 98 | 2024 Sustainability Report, page 269 | Data are collected for procurement of materials and equipment only. Centralised tracking by supplier location is not maintained for other procurement categories |

¹ Retrospective data for 2022–2023 have been revised due to an adjustment of the methodology for calculating some metrics.

| No. | Disclosure | Unit of measurement | 2022 | 2023 | 2024 | Source | Comment |
|---------------------------------|--|---------------------|-----------|-----------|------------------|--|--|
| 9 | Procurement of goods, works, and services from small and medium-sized businesses in total procurement from Russian companies | % | – | – | – | – | The indicator is not disclosed. The Report discloses information on the Company's expenses associated with procurement from suppliers in the key regions of operation (page 139) |
| 10 | Sustainable investments (including green investments) | RUB bn | 29.5 | 18.2 | 14.4 | 2024 Sustainability Report, page 277, 352 | – |
| | Green investments | RUB bn | 5.8 | 3.4 | 4.7 | – | The cost of CAPEX projects to expand electricity and heat generation capacity, as well as power grids and heat networks |
| | Social investments | RUB bn | 23.7 | 14.8 | 9.7 | – | Expenditure on charitable activities including philanthropy and social investments and programmes |
| 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 | % | – | – | – | – | |
| Environmental indicators | | | | | | | |
| 13 | Water used from all water supply sources | Mcm | 1,351.4 | 1,291.9 | 1,224.3 | 2024 Sustainability Report, page 327 | – |
| 14 | Recirculating and recycling water supply | Mcm | 1,104.9 | 1,067.8 | 991.8 | 2024 Sustainability Report, page 327 | – |
| | | % | 81.8 | 82.7 | 81.0 | – | – |
| 15 | Total effluents | Mcm | 74.8 | 73.0 | 68.7 | 2024 Sustainability Report, page 328 | – |
| | including untreated water | Mcm | 40.7 | 40.8 | 37.4 | – | – |
| 16 | Water efficiency (water consumption intensity) | Mcm/RUB bn | 1.7 | 1.8 | 2.0 | Estimated value (item 13 ÷ item 3) | – |
| 17 | Total amount of hazard class 1–5 waste generated, including: | kt | 166,277.8 | 176,894.4 | 174,243.5 | Nornickel's 2022 Sustainability Report , pages 337–338 | – |
| | • hazard class 1 | kt | 0.02 | 0.02 | 0.01 | Nornickel's 2023 Sustainability Report , page 459 | – |
| | • hazard class 2 | kt | 0.04 | 0.05 | 0.07 | – | – |
| | • hazard class 3 | kt | 5.7 | 8.0 | 6.9 | – | – |
| | • hazard class 4 | kt | 1,529.4 | 1,595.5 | 1,154.2 | 2024 Sustainability Report, page 331 | – |
| | • hazard class 5 | kt | 164,742.7 | 175,290.9 | 173,082.3 | – | – |

| No. | Disclosure | Unit of measurement | 2022 | 2023 | 2024 | Source | Comment |
|-----|---|-------------------------------------|----------|----------|-----------------|--|---------|
| 18 | Total hazard class 1–5 waste management, including by category ¹ : | kt | 34,513.1 | 35,100.6 | 30,383.0 | Nornickel's 2022 Sustainability Report , pages 337–338 | |
| | • waste treated | kt | 2.6 | 50.4 | 4.6 | Nornickel's 2023 Sustainability Report , page 419 | |
| | • waste landfilled | kt | 1,443.7 | 1,153.9 | 806.4 | | |
| | • waste recovered | kt | 33,066.8 | 33,896.3 | 29,573.0 | 2024 Sustainability Report, page 331 | |
| | • waste reused | kt | 17,812.7 | 18,529.8 | 13,448.7 | | |
| | • waste recycled | kt | – | 4.9 | 9.0 | | |
| | • reduction of waste generation | % | 6.3 | 6.4 | –1.5 | | |
| 19 | Air pollutant emissions from stationary sources | kt | 1,819.4 | 1,707.7 | 1,307.2 | 2024 Sustainability Report, page 183, 329 | – |
| 20 | Greenhouse gas (GHG) emissions | mIn t of CO ₂ equivalent | 8.9 | 8.7 | 8.6 | 2024 Sustainability Report, page 222 | – |
| | • direct GHG emissions | mIn t of CO ₂ equivalent | 8.4 | 8.2 | 8.2 | | |
| | • indirect energy GHG emissions | mIn t of CO ₂ equivalent | 0.5 | 0.5 | 0.4 | | |
| 21 | Total environmental protection expenditure, including: | RUB bn | 80.8 | 98.1 | 94.4 | 2024 Sustainability Report, page 92 | – |
| | current environmental protection expenditure, including: | RUB bn | 34.4 | 37.8 | 52.3 | | |
| | • air protection and climate change prevention | RUB bn | – | – | 5.8 | | |
| | • wastewater management | RUB bn | – | – | 5.4 | | |
| | • waste management | RUB bn | – | – | 37.3 | | |
| | • biodiversity conservation and protection of natural areas | RUB bn | – | – | 0.003 | | |
| | capital investments to ensure environmental protection and sustainable use of natural resources, including: | RUB bn | 46.4 | 60.3 | 42.1 | | |
| | • air protection and climate change prevention | RUB bn | – | – | 39.5 | | |
| | • wastewater management | RUB bn | – | – | 2.5 | | |
| | • waste management | RUB bn | – | – | 0.1 | | |

¹ The indicators cover waste managed both onsite and offsite.

| No. | Disclosure | Unit of measurement | 2022 | 2023 | 2024 | Source | Comment |
|--------------------------|--|---------------------|---------|-------------|---------------------|--|--|
| | • biodiversity conservation and protection of natural areas | RUB bn | – | – | – | | |
| 22 | Renewable and low-carbon energy consumption | mIn kWh % | – | 3,927 12 | 3,912 12 | 2024 Sustainability Report, page 229 | The Report discloses the amount of electricity generated by HPPs and its share in total energy consumption |
| 23 | Energy efficiency: energy consumption per unit of net added value | kWh/RUB mIn | – | 0.05 | 0.06 | – | Ratio of energy consumption across the Group to net value added |
| Social indicators | | | | | | | |
| 24 | Total labour costs | RUB mIn | 224,512 | 234,869 | 248,029 | Consolidated Financial Statements for the years ended 31 December 2024, 2023, and 2022 , page 59 | – |
| 25 | Total average headcount | thousand people | 78.4 | 80.6 | 78.7 | 2024 Sustainability Report, page 70 | The indicator is disclosed partially. The number of employees with special needs is not disclosed |
| 26 | Average monthly pay by position | RUB thousand | 182.5 | 184.1 | 207.0 | 2024 Sustainability Report, page 79, 80, 81 | – |
| | • blue-collar employees | RUB thousand | – | – | 148.2 | | |
| | • managers and white-collar employees | RUB thousand | – | – | 296.8 | | |
| | by gender | | | | | | |
| | • male | RUB thousand | – | – | 221.2 | | |
| | • female | RUB thousand | – | – | 171.7 | | |
| | by age | | | | | | |
| | • 18–29 years | RUB thousand | – | 135.7 | 152.0 | | |
| | • 30–44 years | RUB thousand | – | 184.4 | 206.0 | | |
| | • over 45 years | RUB thousand | – | 204.9 | 230.9 | | |
| 27 | Total expenditure on health and safety initiatives | RUB bn | 21.6 | 17.5 | 19.8 | 2024 Sustainability Report, page 119 | – |
| | including average per employee | RUB thousand | 272 | 218 | 256 | | |
| 28 | Expenditure on preparing and holding social, sports and recreation, and healthcare events for employees and their families | RUB mIn | 4,670 | 5,076 | 4,707 | 2024 Sustainability Report, page 96 | The indicator discloses information on health resort treatment and voluntary medical insurance |
| 29 | Injuries with lost time of one working day or more, including fatalities | people | 71 | 83 | 78 | 2024 Sustainability Report, page 341 | – |
| | including fatalities | people | 4 | 5 | 3 | | |

| No. | Disclosure | Unit of measurement | 2022 | 2023 | 2024 | Source | Comment |
|------------------------------|---|---------------------|-------|-------|--------------|---|--|
| 30 | Total expenditure on employee training | RUB mln | 1,447 | 1,277 | 1,270 | 2024 Sustainability Report, page 88 | – |
| | including average per employee | RUB thousand | 21.1 | 16.8 | 16.3 | | |
| 31 | Average hours of training per year per employee | hours | 85 | 88 | 126 | 2024 Sustainability Report, page 87 | – |
| | Blue-collar employees | hours | 84 | 91 | 142 | | |
| | White-collar employees | hours | 70 | 65 | 80 | | |
| | Managers | hours | 110 | 106 | 141 | | |
| 32 | Share of employees covered by collective bargaining agreements in the average headcount | % | 94.4 | 94.0 | 94.3 | 2024 Sustainability Report, page 77 | – |
| 33 | Turnover rate | % | 10.5 | 11.4 | 12.4 | 2024 Sustainability Report, page 74 | The ratio of resignations, dismissals for breaches of labour discipline, and negotiated terminations to the average headcount for the year |
| 34 | Total expenditure associated with social programmes not aimed at employees and their families | RUB bn | 23.7 | 14.8 | 9.7 | 2024 Sustainability Report, page 352 | Expenditure on charitable activities including philanthropy and social investments and programmes |
| Governance indicators | | | | | | | |
| 35 | Sustainable development policy and/or other relevant strategic documents in place | – | Yes | Yes | Yes | Nornickel's 2022 Sustainability Report, pages 230–234 Nornickel's 2023 Sustainability Report, page 58 2024 Sustainability Report, page 30 | – |
| 36 | Number of Board meetings | meetings | 38 | 46 | 27 | Nornickel's 2022 Sustainability Report, page 323 Nornickel's 2023 Sustainability Report, page 292 2024 Sustainability Report, page 234 | – |
| | Attendance | % | 100 | 100 | 99 | | |

| No. | Disclosure | Unit of measurement | 2022 | 2023 | 2024 | Source | Comment |
|-----|--|---------------------|------|------|------------|---|---|
| 37 | Total number of directors | people | 13 | 13 | 13 | Nornickel's 2022 Sustainability Report, page 224 Nornickel's 2023 Sustainability Report, pages 291–292 2024 Sustainability Report, page 233 | Board members by age: 35–50 years – 31%, 51–59 years – 54%, over 60 years – 15% |
| | Number of the Audit Committee meetings | meetings | 15 | 16 | 12 | | |
| 38 | Attendance | % | 100 | 100 | 100 | Nornickel's 2022 Sustainability Report, page 323 Nornickel's 2023 Sustainability Report, page 449 2024 Sustainability Report, page 355 | – |
| | Participation in ESG indices and ratings | – | Yes | Yes | Yes | | |
| 39 | Participation in ESG indices and ratings | – | Yes | Yes | Yes | Nornickel's 2022 Sustainability Report, page 234 Nornickel's 2023 Sustainability Report, page 64 2024 Sustainability Report, page 36 | – |
| 40 | Violations of the rights of Russia's indigenous small-numbered peoples | violations | 0 | 0 | 0 | Nornickel's 2022 Sustainability Report, page 186 Nornickel's 2023 Sustainability Report, page 171 2024 Sustainability Report, page 151 | – |
| 41 | Employees occupying positions with a high degree of corruption risk exposure | – | – | – | – | – | The indicator is not disclosed. The Company will consider disclosing this information in future |
| 42 | Average hours of anti-corruption training per year per employee | – | – | – | – | – | – |
| 43 | Administrative sanctions against the organisation, its subsidiaries, and affiliates for corruption | sanctions | 0 | 0 | 5 | Nornickel's 2022 Sustainability Report, page 252 Nornickel's 2023 Sustainability Report, page 346 2024 Sustainability Report, page 256 | – |
| 44 | Share of female managers in the total number of managers | % | 27 | 26 | 22 | 2024 Sustainability Report, page 72, 233 | – |
| | including on the Board of Directors | % | 23 | 31 | 31 | | |



Awards

HR and youth engagement

- Nornickel retained leadership in key rankings of the best employers:
 - First place among employers in the metals and mining industry, 17th place in the Technical Professions category, 45th place in the Business Professions category, and 55–59th place in the IT Professions category, according to the annual Best Company Award by the Changellenge career platform
 - Eleventh place in the Best in Their Target Audience category according to FutureToday
 - Second place in the ranking of Russia's best employers and winner in the Mining and Processing category according to the Talantist sociological study of employer brand perception in Russia by Russia – Land of Opportunity and ANCOR Group
 - Gold in the Forbes Best Employers ranking
 - Top score (Group 1) in the annual employer ranking by RBC
- Nornickel's projects received the HR IMPACT 2024 award in several categories:
 - Digital transformation: Supernika – the best digital transformation project in HR
 - Diversity & inclusion: Women in Mining – the best equal opportunities project
 - Culture & community: In Good Company – the best corporate culture development project
- The Polar Division's corporate projects won the Creating the Future competition:
 - Second place in the Art Workshop category – the Star Corporation festival
 - First place in the Community of Communities category – the Nornickel Dynasties project
 - First place in the Leaders of the Future category – the Career Guidance Networking (part of the Career Navigator project)
- Nornickel was recognised as a Friend of Youth by the Federal Agency for Youth Affairs for creating an ecosystem of projects for young people. The following projects received awards:
 - For school students: Peremena: Change Starts with You, City of Occupations, and IMAKE
 - For university students: Your Move, I Am a Professional, and Conquerors of the North
 - For young specialists: Those Who Care, In Good Company, the Arctic forums, Working Youth Forum, and Biryusa
- Nornickel's interactive career guidance portal for school students, City of Occupations, won RB Digital Awards 2024 in the Corporate Pilot category.
- At the Employer Brand Summit (EMBRAS) international award, Nornickel won gold in the Innovation category for the Supernika project and silver in the Open Dialogue category for the In Good Company project.
- Two of Nornickel's projects won the Silver Archer national award: In Good Company and Building the Future: Nurturing Engineering Talent.

Social projects and charity

- Nornickel became the top performer in the social investment category according to a survey by the international publication Mining Magazine.
- Nornickel became a Partner of National Projects, with four social projects reaching the finals of the Our Contribution national award.
- Nornickel won its second national Responsible Business Leadership award. The Company earned recognition as a leader for its achievements in sustainability: the judging panel commended the Committed to Health and Care programme and the programme to promote the social and economic development of Taimyr.
- Nornickel won the Corporate Philanthropy Leaders competition in two categories:
 - First place for the Committed to Health and Care programme
 - Second place for the Creative Industries Cluster project
- At the 3rd Arena national competition, Nornickel received an award for the Aika sports centre in the Best Sports Organisation for the Whole Family category.
- The documentary Legends of Memory: White Stone Prayer won the MineMovie 2024 Grand Prix in the Best Social Project Film category.
- The Zapolyarye health resort won a series of awards:
 - Second place in the Top 100 Russian Health Resorts rating
 - Five prizes across all categories of the Top 5 Customer-Focused Health Resorts: first place in the Best Medical Department category; second place in the Best Room and Best Restaurant categories; and third place in the Best Recreation Space and Best Space for Children categories
 - Best 3-Star Hotel and Best Health Resort in the National Hotel Awards

Environment

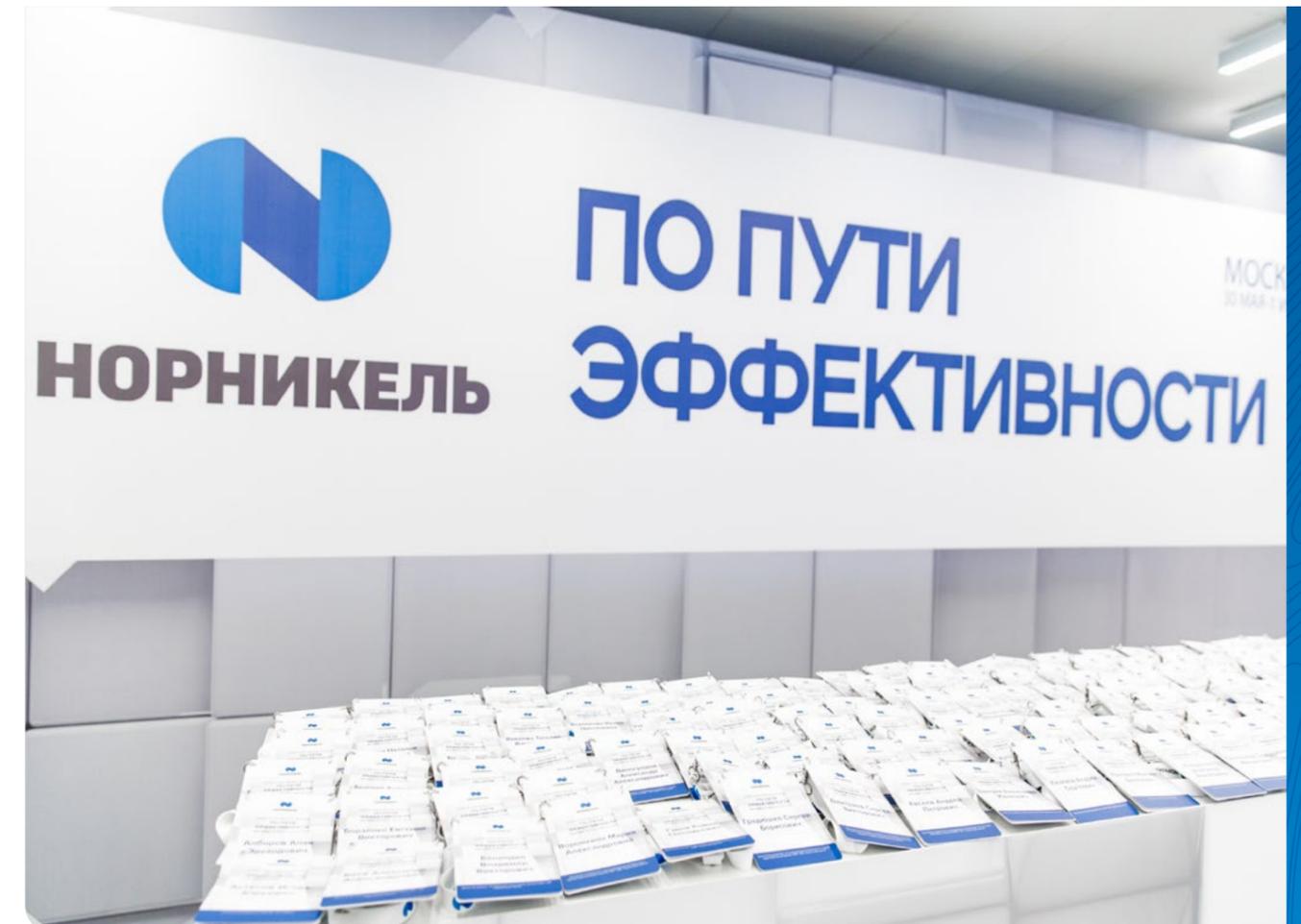
- The Axioma project received an honourable mention at BRICS Solutions Awards in the Climate and Environmental Technologies category and an award of the 5th Reliable Partner – Ecology all-Russian competition of the best local environmental protection practices in the Best Project Implemented in the Russian Arctic category.
- Nornickel won three awards at the ECOTECH-LEADER forum:
 - Emissions Reduction – for the Sulphur Project, reducing sulphur dioxide emissions in Norilsk by 20% in 2024 and 45% in 2025–2026
 - Eco-Transport – for the Group enterprise that transports gas fuel from the Taimyr Peninsula to consumers
 - Environmental Education – for the Artistic Perspectives of Exploration: The Explorer and the Artist project, celebrating the completion of the Big Scientific Expedition's second year

Innovation and technology

- Nornickel's N TRAVEL project (a digital ecosystem for travel and business trips) was recognised with the Digital Pyramid 2024 award as the Best Digital Solution for Managing Virtual Teams and was also ranked among the top-15 best travel management companies, becoming a leader in business travel in the INDEX BBT ranking.
- Nornickel won four awards at the Mining Industry 4.0 competition:
 - Digitisation of Underground Mining – for the implementation of advanced digital solutions
 - Practical Import Substitution – for the Kola site's metals and mining enterprise for its initiative advancing Russian-made technologies
 - AI-Based Solution for Mining – for the Trans-Baikal Division's mining and processing enterprise
 - Occupational Health and Safety – another recognition of projects of the Trans-Baikal Division's mining and processing enterprise
- Nornickel received the Project of the Year IT awards:
 - Best RPA Solution of the Year – for a project to migrate robots from UiPath to PIX RPA without compromising functionality
 - Best Corporate Superapp – for the Supernika mobile app, recognised as unique in the Russian market
- The Polar Division's production enterprise won the anniversary 10th Priority 2024 national award for achievements in industrial technologies in the Metallurgy and Industrial Digital Twins categories.
- Nornickel won the Guides of Meanings contest: its guided tour to an enterprise, featuring mining machinery training simulators, outpaced 2.5 thousand other tourist projects.
- Nornickel's tax-monitoring project won the Mercury national award in the Project of the Year: Finance Automation category. The solution enabled real-time verification of more than 97% of the Company's turnover, maximising the transparency of financial operations.

Information transparency and sustainability reporting

- Nornickel was ranked among top-10 best corporate websites by BCS Express, reaffirming its leading corporate practices and providing complete and transparent information about its business performance, investment plans, and outlook.
- Nornickel joined the leaders of the IR rating compiled by Smart-Lab, a major independent investor community.
- The Siberian Perspective sustainability summit was a finalist of the People Are Key: Companies Investing in the Future, the 17th all-Russian competition of corporate projects. The initiative was also awarded a special mention in the international category of ERP HONOURS 2024.
- Nornickel won the Change Management. Visionaries contest in two categories: Best Corporate Governance Disclosure and Best Social Impact Disclosure.
- Responsible Business Leadership national award – a first-class prize and an honourable mention for contributions to strategic goals in the relevant areas (categories).
- The 27th Moscow Exchange Annual Report Competition – first place in the Best Sustainability Report category.
- RAEX Annual Report Competition 2024 – first place in the Best Annual Sustainability Report category and third place in the Best Sustainability Report Design category.
- AK&M Sustainability Reporting Rating 2023: RESG 1, the highest level of sustainability disclosure in reporting.
- ARC Awards International XXXVIII:
 - Silver in Sustainability Report: Americas & Europe (PDF version)



Abbreviations

| | |
|----------------------------------|---|
| AA1000AP | AA1000 AccountAbility Principles |
| AA1000SES | AccountAbility AA1000 Stakeholder Engagement Standard |
| Ag | Silver |
| AI | Artificial intelligence |
| AML/CFT/PWMD | Anti-money laundering, combating the financing of terrorism and proliferation of weapons of mass destruction |
| APCS | Automated process control system |
| Au | Gold |
| BS | Buildings and structures |
| CAM | Cathode active materials |
| CHPP (CHP plant) | Combined heat and power plant |
| CIMS | Corporate Integrated Quality and Environmental Management System |
| CIS | Commonwealth of Independent States |
| Co | Cobalt |
| CO₂ equivalent | Carbon dioxide equivalent |
| CTL | Corporate Trust Line |
| Cu | Copper |
| DFA | Digital financial asset |
| EBITDA | Earnings before interest, taxes, depreciation, and amortisation |
| EMERCOM | Ministry of the Russian Federation for Civil Defence, Emergencies, and Elimination of Consequences of Natural Disasters |
| ERP | Enterprise resource planning |
| ESG | Environmental, social, and governance |
| FIFR | Fatal injury frequency rate |
| FOCL | Fibre-optic communication line |
| FPIC | Free, prior, and informed consent |
| GHG Protocol | Greenhouse Gas Protocol |
| GISTM | Global Industry Standard on Tailings Management |
| GJ | Gigajoule |
| GOST | State standard |
| GRC | Governance, risk, and compliance |
| GRI | Global Reporting Initiative |
| Group | The Norilsk Nickel Group |
| GTM | Geotechnical monitoring |

| | |
|----------------|--|
| GWP | Global warming potential |
| H&S | Health and safety |
| Hg | Mercury |
| HPP | Hydropower plant |
| ICC | Industrial competence centre |
| ICMM | International Council on Mining and Metals |
| IEHI | Integrated Ecosystem Health Indicator |
| IFRS | International Financial Reporting Standards |
| IPCC | Intergovernmental Panel on Climate Change |
| Ir | Iridium |
| IRMA | Initiative for Responsible Mining Assurance |
| IS | Information security |
| ISMS | Information security management system |
| ISO | International Organization for Standardization |
| IT | Information technologies |
| IUCN | International Union for Conservation of Nature and Natural Resources |
| JDDS | Joint Due Diligence Standard |
| KPI | Key performance indicator |
| LTIFR | Lost time injury frequency rate |
| ML | Machine learning |
| Ni | Nickel |
| NID | Norilsk Industrial District |
| NMP | Nadezhda Metallurgical Plant |
| OECD | Organisation for Economic Co-operation and Development |
| p. p. | Percentage point |
| Pb | Lead |
| PD | Personal data |
| Pd | Palladium |
| PGM | Platinum group metals |
| PPE | Personal protective equipment |
| Pt | Platinum |
| R&D | Research and development |
| Rh | Rhodium |
| RMI | Responsible Minerals Initiative |
| Ru | Ruthenium |
| S | Sulphur |
| SAP | System Analysis Programme Development |
| SASB | Sustainability Accounting Standards Board |

| | |
|-----------------------|---|
| SAWC | Special assessment of working conditions |
| SCADA | Supervisory control and data acquisition |
| Se | Selenium |
| SO₂ | Sulphur dioxide |
| SRM | Supplier relationship management |
| SSP | Shared Socioeconomic Pathways |
| TCFD | Task Force on Climate-related Financial Disclosures |
| TJ | Terajoule |
| UAV | Unmanned aerial vehicle |

| | |
|---------------|---|
| UN | United Nations |
| UN SDG | United Nations Sustainable Development Goals |
| UNCTAD | United Nations Conference on Trade and Development |
| UNESCO | United Nations Educational, Scientific, and Cultural Organisation |
| UNGPs | United Nations Guiding Principles on Business and Human Rights |
| VAT | Value added tax |
| VHI | Voluntary health insurance |
| WRI | World Resources Institute |

Glossary

- **Benefits package:** a set of benefits, compensations, supplementary payments, and statutory and additional services provided by the employer to employees on top of their salary.
- **Business units:** subsidiaries of MMC Norilsk Nickel.
- **Certification:** confirmation of 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:** a legal instrument governing social and labour relationships within a company or a sole proprietor business and signed by representatives of employees and the employer.
- **Compliance:** conducting business in line with the requirements of government authorities, applicable laws, regulations, guidelines, and standards, including internal corporate policies and procedures, as well as ethical business practices.
- **Corporate culture:** a set of standards, values, and beliefs that determine the way a company addresses the matters of internal integration and external adaptation, guide and motivate employees on a daily basis, and evolve under the influence of their behaviour.
- **Corporate social responsibility:** a corporate behaviour philosophy and a concept applied by the business community, companies, and individual businessmen in shaping their activities to meet stakeholder expectations and contribute to sustainable development.
- **Employee development:** a set of initiatives implemented by the Company to attract, onboard, and retain employees, and to fully unlock their professional and creative potential.
- **Environmental protection and resource efficiency:** corporate programmes aimed at minimising the Company's environmental impact.
- **Global Reporting Initiative (GRI):** an independent organisation developing sustainability reporting guidelines and standards.
- **Health and safety:** an occupational health and safety protection system that encompasses legal, social, economic, organisational, technical, sanitary, hygienic, healthcare, rehabilitation, and other activities.
- **HR management policy:** an end-to-end integrated HR management system that covers all stages of employee–employer interaction, from recruitment and hiring to retirement and post-retirement support.
- **HR policy:** a set of standards, rules, regulations, concepts, and goals determining the Company's HR management practices (human resource planning and record keeping, recruitment, onboarding, training and development, management, remuneration and motivation, performance assessment, social security, etc.) in line with its development strategy.
- **Human rights due diligence:** a 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.
- **Kola site:** the Company's nickel refining hub on the Kola Peninsula in the Murmansk Region.
- **Local communities:** the population with Russian citizenship.
- **Mediation:** an alternative dispute resolution method 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 an MMC Norilsk Nickel share.
- **Mission:** the purpose and reason for the organisation's existence that sets it apart from other similar entities
- **Motivation:** tools and methods of boosting staff performance and productivity, motivating an employee or a group of employees to achieve corporate goals.
- **Norilsk Industrial District:** the territory of municipalities, which includes the city of Norilsk, the Taimyrsky Dolgano-Nenetsky Municipal District, and the Turukhansky District.
- **Norilsk site:** Group branches and business units located on the Taimyr Peninsula in the north of the Krasnoyarsk Territory. This is where the Company's largest deposits are being developed. This production asset operates a full metals production cycle – from ore mining to the shipment of finished products.
- **Occupational disease:** a health condition that arises and develops as a result of systematic and prolonged exposure to workplace factors specific to a given occupation or to a combination of working conditions characteristic of a particular production environment.
- **Payroll:** the total amount allocated for employee compensation (wage fund) and social benefit payments.
- **Permafrost thawing:** a 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 thaw.
- **Risk:** a negative factor that may result from current processes or future events and potentially impact the Company's ability to achieve its goals.
- **Safe working conditions:** working conditions where exposure to work-related health and/or injury hazards is prevented or controlled within the set limits.
- **Senior executives:** the President, Vice Presidents, heads of departments in case of the Head Office, and CEOs and their deputies in case of entities located in the Norilsk Industrial District and on the Kola Peninsula.
- **Significant locations of operation:** Russian regions where the Company's core production is concentrated and key assets in terms of headcount (1 thousand employees or more) are located: the Norilsk Industrial District, the Krasnoyarsk Territory (excluding the NID), the Kola Peninsula (Murmansk Region), the Trans-Baikal Territory, Moscow, and other Russian regions.
- **Social partnership:** a framework of relationships among employees (their representatives), employers (their representatives), and federal and local government authorities, aimed at reconciling the 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 are aimed at balancing the interests of various stakeholders. From a 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.
- **South 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:** individuals, legal entities, groups, associations, and other organisations whose interests may be affected by the Company's operations, as well as parties that may influence the Company. Stakeholders include the Company's shareholders, investors, employees, suppliers, contractors, consumers, trade unions and other non-governmental organisations, federal and local authorities, mass media, residents of the Company's regions of operation, and others.
- **Standard:** a procedural document containing a set of requirements for various aspects of activities.
- **Sulphur Project:** 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 for the establishment of green production.
- **Sustainability Report (non-financial report):** an 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 issues most relevant to its key stakeholders. This is a way of publicly informing shareholders, employees, partners, and other stakeholders of the Company's progress and pace towards its goals and objectives set out in its mission or strategic development plans, with respect to financial and environmental stability and social well-being.
- **Sustainable development:** a concept of global community development defined by the UN, which acknowledges the role of business in ensuring the sustainable development of society and takes into account the interests of both present and future generations.
- **System Analysis Programme Development Governance, Risk, and Compliance (SAP GRC):** an SAP-based information system combining three main components – corporate governance, risk management, and compliance.
- **Tailings storage facility:** a facility encompassing dedicated structures and equipment designed for the storage or disposal of radioactive, toxic, or other tailings resulting from the concentration process.
- **The Nornickel (Norilsk Nickel) Group:** for the purpose of the 2024 Sustainability Report, PJSC MMC Norilsk Nickel and the entirety of Russian business units forming the Norilsk Nickel Group. Unless otherwise stated or required by the context, the "Company", the "Group", "Nornickel", or "Group companies" refer to the Nornickel Group.
- **Top management:** the President, First and 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; and sole executive bodies (directors and CEOs) of Group companies and their deputies.
- **Unit of the Company's Head Office:** a department, office, or any other unit that is included in the organisational structure of the Company's Head Office, as approved by the President of MMC Norilsk Nickel, and/or operates based on a staffing list approved by the Senior Vice President – Head of HR, Social Policy, and Public Relations.
- **Young talent:** graduates of universities and colleges whose post-graduate experience does not exceed three years.

The glossary of abbreviations as well as technical and other terms is available on [Nornickel's official website](#).

Incorporating stakeholder recommendations

Nornickel has a decades-long track record of stable operations, contributing to the country's development, global progress, and the advancement of the green economy. Sustainability principles are deeply embedded in Nornickel's corporate values and traditions, emphasising robust management, employee safety, labour rights, and environmental protection. Nornickel remains

committed to these principles, continually seeking effective solutions for long-term development despite external challenges. A key element of this process is maintaining open and regular stakeholder dialogue, which helps shape a sustainable future for both the Company and its regions of operation.

Towards A Sustainable Future – 90th Anniversary of Nornickel: stakeholder dialogue minutes

Date and time: 29 January 2025, 10:00–12:00 am

Format: live-streamed in-person meeting¹

Key target audience: Company managers and employees, regional and municipal authorities, local communities, non-profit organisations, investors, the business community, research firms and rating agencies, and sustainability experts

Event purposes:

- Sharing the results of the stakeholder survey conducted as part of assessing impacts and determining material topics
- Discussing the Company's key strategic initiatives with a wide range of participants, including the HR and social policy, environmental and occupational health management, and information security within the sustainability agenda
- Holding joint discussions with event participants, gathering suggestions and feedback from stakeholders on the Company's activities in line with the identified material topics, as well as on the disclosure of information in the 2024 Report

Programme

Item No. 1. Results of Stakeholder Survey

Item No. 2. Environmental Management: Sulphur Project and Launch of Environmental Monitoring

Item No. 3. Information Security: A Contributor to the ESG Agenda

Item No. 4. Implementation of the Social Policy: Creating Comfortable Conditions for Employees and Local Residents Across the Company's Footprint

Item No. 1. Results of Stakeholder Survey

Speaker:

Inessa Chernova
Head of Sustainability Reporting, Sustainable Development Department at MMC Norilsk Nickel

Inessa Chernova presented the updated 2024 materiality assessment procedure, which included an expanded list of impacts for assessment. Respondents were given the option to either confirm the relevance of last year's averaged assessments across key GRI parameters or adjust them. The number of questions was also increased, partly as a forward-looking measure to ensure alignment with ISSB requirements (IFRS S1/S2).

According to the survey results, Nornickel's HR and social policies lead the ranking of material topics, environmental topics dominate in number, and a new material topic – Information Security – was identified.

Inessa Chernova also highlighted that the cross-cutting theme of the 2024 Report will be Well-Being for Future Generations in the Context of the National Agenda. The Company carries out a broad array of programmes and initiatives that play a significant role in advancing national goals and projects. Disclosures will continue in line with GRI Standards, SASB Metals & Mining, and UNCTAD, while GRI 14, TNFD, and IFRS S2 standards are currently applied on a pilot basis. Dedicated reports (human rights, climate change, and responsible supply chain) are planned for release.

Item No. 2. Environmental Management: Sulphur Project and Launch of Environmental Monitoring

Speaker:

Stanislav Seleznev
Vice President for Ecology and Industrial Safety at MMC Norilsk Nickel

Stanislav Seleznev presented the key results of the Company's environmental initiatives, highlighting the fulfilment of commitments under the Clean Air national project and plans to double sulphur dioxide recovery. In the reporting year, the first Arctic air quality monitoring system, featuring 16 emissions control stations, was launched for Norilsk residents, with AI-powered emissions forecasting.

In 2024, a project was also launched to build a solar power plant in the Trans-Baikal Territory. Biodiversity conservation efforts are consistently implemented, including support for nature reserves, the use of drones for wildlife population monitoring, and the ongoing development of methodologies for assessing ecosystem health.

In 2024, safety was formally established as one of the Company's core values, and a new approach to accident recording was introduced, resulting in a reduced accident rate. The Company is also reforming its health and safety system by replacing lengthy instructions with concise, clear procedure rules.

Stanislav Seleznev emphasised that the Company remains committed to reducing its environmental footprint, enhancing data transparency, and adopting advanced sustainability technologies.

¹ A record of the event is available at: <https://rutube.ru/video/e6167644fe943f9afa7c4a28a12216b7/>.

Item No. 3. Information Security: A Contributor to the ESG Agenda

Speaker:

Alexey Martyntsev
 Director of the Information Protection and IT Infrastructure Department at MMC Norilsk Nickel

Alexey Martyntsev emphasised that digital transformation is impossible without robust data protection, and automated production processes demand heightened vigilance against cyber threats. At Nornickel, the primary focus of protection is on critical facilities, where potential cyber attacks could impact production, the environment, and employee safety. In recent years, the Company has prioritised securing automated process control systems, driven in part by the need for import substitution. In several segments, no Russian equivalents exist, prompting

the Company to establish partnerships with key industry players, exchange expertise, and support the development of the information security market.

The Company participates in shaping legislative initiatives as a member of working groups across various agencies. The Club of Information Security in Industry was founded eight years ago, bringing together major companies to coordinate data protection efforts. In 2024, the platform served as the foundation for developing a Code of Ethics for the Information Security Market – a pioneering initiative in Russia. The emergence of cyber culture as a new trend in Russia was highlighted separately. The Company provides cyber security training for employees and their families, actively collaborates with universities, and promotes information security at the level of government agencies.

Item No. 4. Implementation of the Social Policy: Creating Comfortable Conditions for Employees and Local Residents Across the Company’s Footprint

Speaker:

Larisa Zerkova
 Senior Vice President for HR, Social Policy, and Public Relations at MMC Norilsk Nickel

Larisa Zerkova highlighted that Nornickel places special emphasis on the well-being of its employees and local residents, developing social programmes aimed at enhancing quality of life, ensuring comfortable working conditions, and supporting professional growth. The Company is actively pursuing educational initiatives and expanding its in-house corporate Nornickel Academy. A modern approach to training fosters new practices and motivates employees.

The Company is also actively involved in renovating cities across its footprint. In 2023, the first new residential buildings in Norilsk in 40 years were commissioned, with additional projects scheduled for launch in 2025. Furthermore, the Digital Investor programme is ongoing, allowing employees to receive digital assets pegged to the value of Company shares.

In conclusion, Larisa Zerkova emphasised that the Company aims not only to maintain high positions in ratings but also to systematically improve social standards and quality of life across its regions of operation.

The speakers’ reports were followed by an open discussion where stakeholders could ask questions, provide comments, and make suggestions. Additional discussions focused on employee recruitment across Group enterprises amid staff shortages, potential funding through social impact bonds, the application of innovative technologies across operations, fostering a cyber security culture, adapting to climate change, collaborating with contractors on health and safety, and aligning corporate initiatives with national goals.

Discussing motivation and remuneration, Larisa Zerkova highlighted that the Company offers competitive employment conditions and actively attracts young talent. As part of these efforts, the In Good Company programme is being developed, providing internships, career opportunities, and support for both professional and personal growth. On top of this, the Company continues to upgrade its facility infrastructure, including through the Made with Care programme, which aims to enhance employees’ workplace amenities. In 2024, a 10% pay rise was implemented, corporate healthcare options were expanded, and the health resort programme was enhanced.

List of stakeholder recommendations

| Recommendations/topics for disclosure | Company response |
|--|--|
| From external stakeholders | |
| Provide more details on engagement with small and medium-sized enterprises across Russian regions | Done. Disclosed in the Contribution to the Development of Local Communities section |
| Describe the contribution to biodiversity conservation (restoration/study) and environmental protection | Done. Disclosed in the Biodiversity section |
| Provide an update on the Company’s sustainability governance structure | Done. Disclosed in the Sustainability Management section |
| Discuss the Company’s shift to recycled materials in product manufacturing | To be done in the upcoming reporting cycles |
| Disclose the quantitative results of charitable initiatives | To be done in the upcoming reporting cycles |
| Disclose the amount of funds allocated to endowments | Partially done. Disclosed in the Improving the Well-Being of Local Communities section |
| Enhance information on safety culture | Done. Disclosed in the Control of Compliance with H&S Requirements and Prevention of Violations section |
| Disclose information on the Company’s activities within the framework of the seven national goals | Done. Disclosed in the Report and in the Nornickel’s Contribution to the UN SDGs and Alignment with the National Strategic Priorities section |
| Report on initiatives to promote leadership development and/or employee career management, with a focus on young talent | Done. Disclosed in the Training Ecosystem section |
| Describe anti-corruption initiatives involving employees | Done. Disclosed in the Business Ethics and Anti-Corruption section |
| Disclose support measures for pregnant employees, mothers with young children, and large families | Done. Disclosed in the Social Support for Employees and Their Families section |
| From internal stakeholders | |
| Specify benchmarks for each sustainability aspect, strategic goal, and metric | Done. Disclosed in the Sustainable Growth Strategy section |
| Disclose details on climate project implementation, climate risk management, and the development of a permafrost monitoring system | Done. Disclosed in the Climate Change section and in Nornickel’s 2024 Climate Change Report |
| Provide more details on the creation of jobs across Russian regions | Done. Disclosed in Nornickel’s HR Strategy , Social Support for Employees and Their Families , and Contribution to the Development of Local Communities sections |
| Disclose information on the development of in-house production and the use of innovative exploration solutions | Disclosed in Nornickel’s 2024 Annual Report |
| Disclose information on reforestation efforts and soil replacement with fertile soil | Partially done. Disclosed in the Soil Protection and Responsible Mining section |
| Describe the impact on quality of life of local communities | Done. Disclosed in the Improving the Well-Being of Local Communities and Contribution to the Development of Local Communities sections |

Final report on the results of public assurance



Opinion of the RSPP Council on Non-Financial Reporting and Sustainability Indices and Ratings on the Norilsk Nickel Group's 2024 Sustainability Report submitted for public assurance purposes

At the request of PJSC MMC Norilsk Nickel (the "Company"), the RSPP Council on Non-Financial Reporting and Sustainability Indices and Ratings (the "Council") reviewed the Norilsk Nickel Group's 2024 Sustainability Report (the "Report").

The Company requested RSPP to arrange for the public assurance of the Report by the Council. The Council forms its opinion on the relevance and completeness of information on the Company's performance disclosed in the Report in accordance with the principles of responsible business practices contained in the Social Charter of Russian Business and compliant with the United Nations Global Compact as well as Russian and international social responsibility and sustainability standards and guidelines.

The public assurance (verification) process took place from 10 April to 30 May 2025 in accordance with the Council's approved Procedure for Public Assurance of Corporate Non-Financial Reports. This Opinion is based on an expert review and evaluation by the RSPP Expert Panel on Sustainability Reporting as well as analysis of the Report and review of its evaluation results by the Council on Non-Financial Reporting and Sustainability Indices and 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 information provided was evaluated based on the following criteria for the completeness and relevance of the information contained in it:

Information is deemed relevant if it reflects the Company's activities aimed at implementing the principles of responsible business practice outlined in the Social Charter of Russian Business (www.rspp.ru).

Information is deemed complete if the Report gives a comprehensive view of the Company's activities: values and underlying strategic priorities, governance systems and structures, stakeholder engagement, achievements, key results, and KPIs.

The public assurance process takes into account the use of international reporting frameworks by the Company. However, evaluation of the Report's compliance with international reporting frameworks is outside the scope of this Opinion.

Responsibility for the information and statements contained in the Report lies with PJSC MMC Norilsk Nickel. Reliability of the reported data is not subject to public assurance.

This Opinion has been prepared for PJSC MMC Norilsk Nickel. The Company is entitled to use this Opinion both for internal purposes and for stakeholder communications, publishing it with no alterations.

Conclusions

After reviewing the information presented in the Report and the information publicly available on the Company website, and following a group discussion of the results of an independent evaluation of the Report performed by members of the RSPP Expert Panel on Sustainability Reporting, the Council on Non-Financial Reporting and Sustainability Indices and Ratings confirms the following:

The Norilsk Nickel Group's 2024 Sustainability Report covers all key areas of responsible business practices in line with the principles of responsible business conduct. The Report offers an adequate level of disclosure regarding the Company's activities in these areas.

The 2024 Report has addressed the RSPP Council's recommendations from the public assurance of the Norilsk Nickel Group's 2023 Sustainability Report. The labour productivity indicator is presented, and stakeholder feedback is provided for each section of the Report. The information on the measures contributing to energy savings and reduced consumption of energy resources has been expanded, with updated links to corporate documents (policies and strategies) provided.

Based on the criteria used in the public assurance procedure to assess the relevance and completeness of information on the Company's performance in line with the principles of responsible business conduct (as outlined in the Social Charter of Russian Business), the integrated (overall) indicator of information disclosure was high (over 90%) and showed an improvement compared to the previous reporting period.

The 2024 Report contains relevant information on the following aspects of responsible business practices:

Economic freedom and responsibility: The Report contains information on the Company's key focus areas and principal financial and economic performance results. The Report also covers its production chain. It also outlines the Company's role in the Russian economy, its industry standing, and its position

in the global metals market, with regard to future market trends. Structural changes within the Company are reported, including the merger of the Norilsk and Kola Divisions into the Polar Division in 2024 to improve the efficiency of operations and optimise management processes. The Report highlights Norilsk Nickel's stable operational performance and resilience to external challenges. The Report also discloses the Company's import substitution efforts and achievements. It also covers the Company's innovation initiatives and R&D projects, the implementation of its Innovation Strategy, and new products developed as part of advancing green technologies, including palladium-based products. The Report includes information on the progress on the investment programme for 2024–2025 and integration of digital solutions and artificial intelligence into business processes as well as on information security efforts. Data are presented on the measures taken to ensure product quality within the Corporate Integrated Management System. Key sustainable development priorities are highlighted, along with the activities set out in the 2030 Socially Sustainable Development Strategy and the 2031 Environmental and Climate Change Strategy. Key performance indicators (KPIs) are also outlined. The Company's contribution to the UN SDGs and to Russia's national projects, aligned with national development goals, is highlighted. The Report describes the corporate governance model, including the Board of Directors' role in sustainability governance, and outlines the risk management system. Information is provided on the development of corporate culture, the Company's anti-corruption approach, procedures, and measures, as well as the results achieved in this area.

Partnership in business: The Report covers the mechanisms and outcomes of engagement with various stakeholder groups and presents the Company's stakeholder map reflecting the 2024 highlights. Both existing and newly developed internal documents regulating stakeholder engagement at the Company are listed. Shareholders and investors: Investor engagement mechanisms and key activities are disclosed. Information is provided on the implementation of the retail investor strategy, including continued efforts to expand the pool of private investors through, among other things, the development of the Digital Investor innovative corporate programme for Company employees. The first payments to employees under this programme have been reported. Employees: the Report contains information on the HR management system, job creation, employee training and development, social guarantees and incentives, as well as the update of Norilsk Nickel's HR strategy for 2024–2026 carried out during the reporting year. The internal communications system is covered, including dialogues between managers and employees and the use of the corporate mobile app to connect employees across different production sites. Employee engagement survey results are reported. The talent management strategy is described. The creation of a youth ecosystem and the development of corporate volunteering are reported. The Report presents the occupational health management system within the Company and across the supply chain, highlights measures to improve safety culture, provides information on the implementation of digital controls, and outlines efforts to prevent injuries and occupational diseases. The Report includes information on the special assessment of working conditions. Data on managing complaints and queries

submitted via the Corporate Trust Line are included. Authorities: the Report outlines the Company's liaison with government authorities in implementing regional development plans, national projects, environmental stewardship measures, and in other areas. It provides information on the participation of the Company's representatives in dedicated committees, councils, and other working bodies operating under government authorities. Suppliers and contractors: Norilsk Nickel's approach to building a responsible supply chain is described. The Report describes supplier assessment procedures based on sustainability criteria and notes the launch of annual evaluations for compliance with corporate requirements, including respect for human rights, occupational health, labour relations, and environmental safety. To underscore the importance of this topic to Norilsk Nickel, the Report informs that the Company has issued a standalone Responsible Supply Chain Report. The launch of a responsible supply chain training course for employees is reported. Consumers and customers: the Report notes that, to build effective relationships with customers, the Company conducts surveys and continuously monitors compliance with its contractual obligations to them. The results of the customer satisfaction assessment for the reporting year are presented. The Report includes details of the Company's sales strategy, which seeks to ensure uninterrupted supplies of products to customers. Business partners: the Report highlights that the Company actively fosters partnerships with the scientific and expert community and implements innovations and best practices to improve its system for industrial and environmental safety and occupational health. The document outlines cooperation with public institutions, non-profit and educational organisations, and provides information on the Company's joint projects and its membership in business and industry associations.

Human rights: the Report includes a section dedicated to human rights, outlining the Company's principles and management approaches in this area as formalised in its Human Rights Policy and other internal documents. It is noted that the Company has prepared a standalone 2024 Human Rights Report. The Company affirms its zero tolerance for discrimination on any grounds as well as its commitment to respect for employee labour rights and cooperation with trade unions and other employee representatives. The Report also provides data on the share of employees covered by collective bargaining agreements. It is noted that human rights matters are addressed at meetings of the Board of Directors. The Company states a zero tolerance approach to any violations of human rights across the supply chain. The Report indicates that Norilsk Nickel has continued to develop its human rights due diligence system. According to the Report, a human rights training course was launched during the reporting year. The Report includes information on the employment of persons with special needs, the observance of their rights, and measures to create an accessible environment within the Company. The Company sets out its position on respecting the rights of indigenous small-numbered peoples, including their rights to territories and resources, preservation of culture and spiritual traditions. According to the Report, in 2024, a new version of the Policy of Engagement with Indigenous Small-Numbered Peoples was approved, developed in collaboration with leading independent experts and representatives of tribal communities. The results of the targeted support programme for the peoples of the Taimyr Peninsula for five years are disclosed.

Environmental conservation and the climate agenda:

The Report discloses key aspects of the environmental impact of the Company's operations and highlights the implementation of the 2031 Environmental and Climate Change Strategy, updated in 2024, along with its key focus areas and target indicators. The Board of Directors is reported to have approved Norilsk Nickel's Key Focus Areas of Carbon Neutrality. The Company also reports the launch of its updated Sulphur Project 2.0 at Nadezhda Metallurgical Plant and the successful implementation of the Project's first stage to reduce sulphur dioxide emissions. The structure and functionality of all levels of environmental governance and management are presented, including the role of the Board of Directors. The Report covers the Company's environmental management system and notes the successful completion of the latest surveillance audit, which reaffirmed compliance of Norilsk Nickel's corporate integrated environmental management system with ISO 14001:2015. Key environmental indicators are presented with a focus on changes over time. 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. Information on the implementation of PJSC MMC Norilsk Nickel's Tailings Management Policy is included. The Report states that the Company's efforts in water management are primarily aimed at ensuring that wastewater quality complies with regulatory requirements as well as indicates the percentage of water the Company recycles and reuses. The impact of transport on water bodies is described. Information on the implementation of the Clean Norilsk programme is provided, along with the associated operating expenses in 2024. The Company announced that it had completed rehabilitation of territories after the incident at CHPP-3. The Report provides details on Norilsk Nickel's contribution to the work of the Arctic and Biodiversity Conservation team of Rosprirodnadzor's R&D Council. Biodiversity impact management issues are addressed, including in the context of the value chain and life cycle stages. The Company describes its integrated approach to the development of energy infrastructure facilities and provides an update on the progress of the infrastructure upgrade plan until 2030. The most significant projects focused on enhancing equipment reliability and increasing energy efficiency are outlined. Energy generation and consumption indicators are also covered. The Report highlights the Company's efforts to leverage more cost-efficient energy sources, as evidenced by the increased share of renewable energy consumption. The Report informs about the launch of a project to build a solar power plant in the Trans-Baikal Territory. The Company's climate strategy and its approaches to climate-related risk management are described. The release of a standalone Climate Change Report is announced. 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. Key results of the Company's corporate climate agenda are presented. Information on greenhouse gas emissions is provided. The Report also highlights the role of the volunteer movement, which brings together Company employees, local community members, and government authorities, in supporting environmental protection efforts.

Participation in local community and regional development:

The Report outlines the Company's contribution to the social and economic development of local communities across its footprint, in line with the 2030 Socially Sustainable Development Strategy. The Company's importance to the economies of its operating regions is demonstrated, including tax contributions, job creation, and support for local suppliers. The Report provides information on projects carried out by the Company in partnership with government authorities to support the development of Dudinka, Monchegorsk, Zapolyarny, and Norilsk. These cities have demonstrated annual improvements in the Urban Environment Quality Index of the Russian Ministry of Construction, Housing, and Utilities. Information is provided on the implementation of tourism investment projects, the Company's contribution to the Tourism and Hospitality Industry national project, and the launch of the first real-time air quality monitoring system within the Arctic Circle (in Norilsk). The Company discloses data on the integration of local businesses into the Group's production chain. The GR Accelerator programme, aimed at rolling out the municipal investment standard in 2023–2024, is described. The Report presents key initiatives aimed at improving quality of life across the Company's regions of operation, implemented by Norilsk Nickel in collaboration with the Norilsk Development Agency, Monchegorsk Development Agency, and the centre for community initiatives in the Pechengsky District. Data are provided on the focus areas and amount of social investments as well as the structure of the budget allocated for regional development across the Company's footprint.

Concluding statements

Overall, the Report confirms the Company's adherence to the principles of responsible business conduct, outlines the Norilsk Nickel Group's sustainability strategy and performance, and provides details on the management systems that support the achievement of its sustainability goals. Detailed information is presented on the Company's progress in achieving the UN SDGs under the 2030 Agenda for Sustainable Development, and its contribution to the implementation of national projects, demonstrating the alignment of the results achieved with Russia's national development goals. A significant number of performance indicators covering economic, social, and environmental aspects is disclosed. The Report informs that the material topics disclosed in the Report were identified taking into account stakeholder feedback. Standalone thematic reports on the priority topics related to climate change and responsible supply chain management are reported to have been published, detailing the Company's approaches and activities in these areas.

The Report has been prepared in accordance with the GRI Sustainability Reporting Standards (2021). In preparing this Report, the Company also took into account the UN Global Compact, the SASB Metals & Mining Sustainability Accounting Standard (2021), the UNCTAD Guidance on Core Indicators for Entity Reporting on Contribution Towards Implementation of the Sustainable Development Goals, recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), RSPP's Reference Performance Indicators, and the AA1000SES (2015) and AA1000AP (2018) standards. The Company

also followed the Methodological Recommendations for the Preparation of Sustainable Development Reports approved by the Russian Ministry of Economic Development and piloted the use of the GRI 14, TNFD, and IFRS S2 standards.

The 2024 Report is the Company's twenty-first non-financial report, demonstrating its consistent approach to developing its reporting processes and commitment to transparency and openness. The Company uses various forms of independent evaluation and verification of disclosed information (professional audit and public assurance), demonstrating a responsible approach to maintaining the high quality of disclosures.

Recommendations

While recognising the strengths of this Report, the Council would also like to draw the Company's attention to several aspects that refer to the relevance and completeness of information and are of importance for stakeholders and recommend considering them when preparing future reports.

The Council would like to note that the recommendations arising from the review of previous reports remain relevant and can be used in future reporting practice.

The Report contains information on the corporate risk management system, along with a list of risks, including sustainability risks. It is recommended that future reports place special focus on these risks and provide more details on sustainability risk management.

The Report notes the Company's decision to gradually phase out Copper Plant's smelting capacity, with complete shutdown planned by the end of 2027. A part of the production chain is expected to be relocated to China, the largest consumption market. The Council recommends disclosing information on the development of the production chain in China in future reports.

The Report highlights the Company's active investment activities aimed at expanding the use of renewable energy sources. It is considered appropriate to continue disclosing information in this area, given the relevance of renewable energy use in the Company's regions of operation, including a breakdown of related projects and plans by division.

Given the challenging conditions in the Russian labour market, the specific conditions in the Company's regions of operation, and the shortage of engineering and technical personnel, the Council recommends that the Company provides more detailed information on how staffing issues are addressed, including in the long term.

The Report presents a substantial number of performance indicators with a focus on changes over time. It is recommended that future reports place greater emphasis on commenting on statistical data, including observed trends.

The Company is strongly focused on the topic of biodiversity conservation, identified as a material topic in this Report. It is recommended that in the next report, the Company places greater emphasis on how it assesses its impact on biodiversity, including the results of the Big Scientific Expedition.

Attention should be drawn to the importance of including clear explanations on reporting boundaries of individual topics and indicators if they differ from the overall reporting scope.

The Report provides a detailed description of the procedure for determining material topics in accordance with the relevant GRI Standard (2021), along with information on stakeholder participation in the process (internal and external stakeholders). It is recommended that future reporting cycles include information on the stakeholder groups involved in the materiality assessment procedure.

The RSPP Council on Non-Financial Reporting and Sustainability Indices and Ratings expresses its positive opinion on the Report, supporting the Company's commitment to the principles of responsible business practices and noting the Company's consistency in enhancing its reporting practices, and confirms that the Norilsk Nickel Group's 2024 Sustainability Report has successfully passed the public assurance process.

RSPP Council on Non-Financial Reporting and Sustainability Indices and Ratings

Independent assurance report

GRI 2-5

JSC "Kept"
 Business center Alkon III
 34A Leningradsky Prospekt
 Moscow, Russia, 125040
 Telephone +7 (495) 937 4477
 Fax +7 (495) 937 4499



Independent Audit Firm's Limited Assurance Report on the Information in the Norilsk Nickel Group's 2024 Sustainability Report

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 Norilsk Nickel Group's ("the Group") 2024 Sustainability Report ("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 TCFD¹ in the Appendix to the Report "TCFD Disclosures" and marked "Assured" in the column "Assured by the auditor";
- GRI² 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.

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

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

² Indicators prepared in accordance with Global Reporting Initiative (GRI) Sustainability Reporting Standards.

PJSC "Mining and Metallurgical Company "Norilsk Nickel"
Independent Audit Firm's Limited Assurance Report on the Information in the Norilsk Nickel Group's 2024 Sustainability Report
 Page 2

kept

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*, the *Russian Code of Professional Ethics for Auditors*, other independence requirements applicable to our engagement in the Russian Federation, 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;
- 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;

PJSC "Mining and Metallurgical Company "Norilsk Nickel"
Independent Audit Firm's Limited Assurance Report on the Information in the Norilsk Nickel Group's 2024 Sustainability Report
 Page 3

kept

- conducting procedures at the level of two branches of PJSC "Mining and Metallurgical Company "Norilsk Nickel" and of nine companies of the Group 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)³;
- Global Reporting Initiative Sustainability Reporting Standards (GRI)⁴.

Inherent Limitations

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

³ <https://www.fsb-tcfd.org/recommendations/>

⁴ <https://www.globalreporting.org/standards>

PJSC "Mining and Metallurgical Company "Norilsk Nickel"
 Independent Audit Firm's Limited Assurance Report on the Information in the
 Norilsk Nickel Group's 2024 Sustainability Report
 Page 4



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. 44/25 as of 9 January 2025

Moscow, Russia

26 May 2025

Disclaimer

The information contained herein relies on the data available to PJSC MMC Norilsk Nickel as at the date of the 2024 Sustainability 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:

- 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 as well as Russian individuals and legal entities
- the Russian Federation's response to sanctions
- economic and other measures introduced to maintain the economic and financial stability of the Russian Federation
- other factors beyond the Company's control.

The Report discloses the Company's short-, medium-, and long-term goals and plans. All plans and intentions outlined in this Report are provisional and subject, among other things, to a number of economic, political, and legal factors, including those beyond Norilsk Nickel'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 by independent experts, 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

GRI 2-3

Head Office

1st Krasnogvardeysky Drive 15, Moscow, Russia, 123112

Phone: +7 495 787 7667

E-mail: gmk@nornik.ru

Sustainable Development Department

Maria Krayenskaya

Head of ESG Projects

Inessa Zakharova

Head of Sustainability Reporting

Phone: +7 495 797 8250

E-mail: social_report@nornik.ru

Public Relations Department

Tatiana Smirnova

Head of Public Relations

Phone: +7 495 785 5800

E-mail: pr@nornik.ru

Nornickel on social media

Vkontakte

vk.com/nornickel_official

vk.com/hrnornickel

vk.com/goodcompany_nornik

Telegram

t.me/nornickel_official

t.me/s/nornickel_life

t.me/rabotanornickel

Odnoklassniki

ok.ru/nornickel

ok.ru/group/53386118496465

Video services

youtube.com/user/NornikOfficial

rutube.ru/channel/24161124/

Norilsk through the eyes of its residents

norilskfilm.com

Corporate website

nornickel.com