

Green innovation

New palladium applications

Pd



Palladium has traditionally been used in the automotive, chemical, and electronics industries. In recent years, its range of applications has expanded to include green energy, water treatment systems, and other priority sectors.

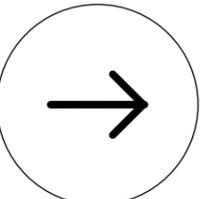
Solutions developed by Nor Nickel’s Palladium Centre help to:

- improve the efficiency of solar panels – a palladium coating reduces light loss thanks to its high reflectivity
- accelerate hydrogen oxidation and boost the performance of hydrogen fuel cells
- lower the cost of green hydrogen and conductive components in electronic devices

The Company already has over 25 projects in its portfolio and aims to grow this number to more than 100 palladium-based products by 2030.

04. Sustainable development

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Strategic approach

Contribution to the UN SDGs



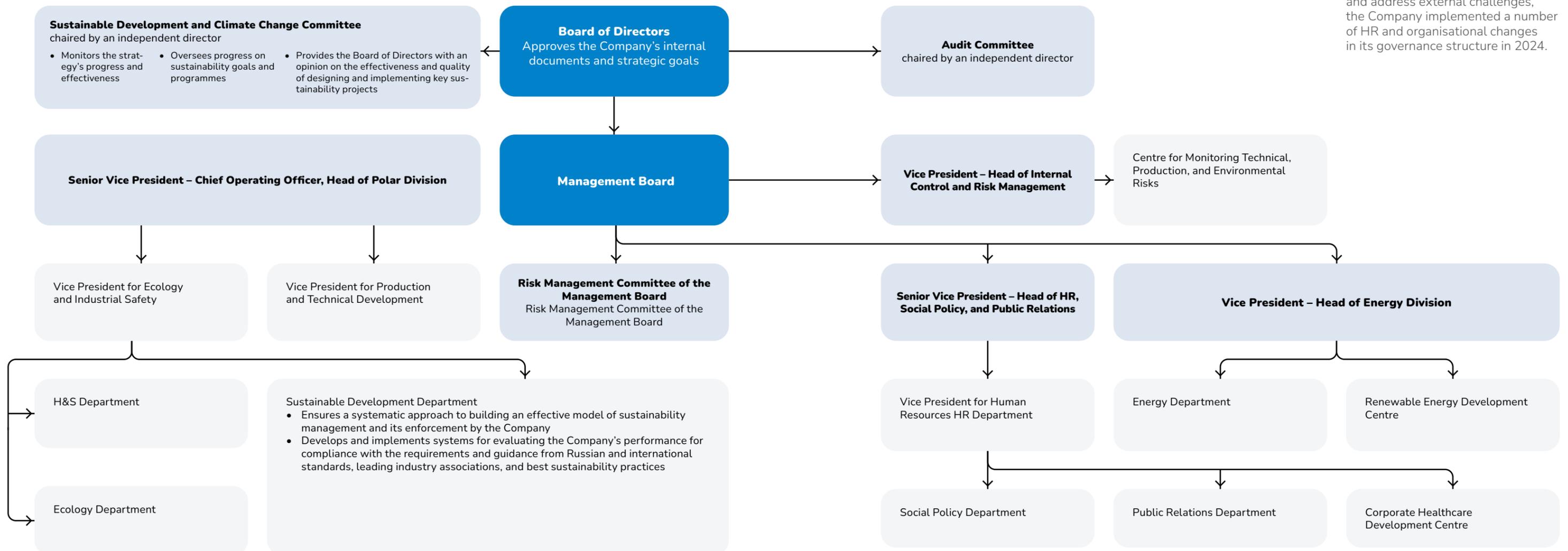
Sustainability governance

Nornickel's sustainability governance approach follows a matrix model, in which responsibility for specific environmental, social, and governance (ESG) areas is integrated into the operations of all functions and distributed across the organisation. Key decisions and oversight on most matters rest with the Management Board, the Board of Directors, and their dedicated committees.

Sustainability-related processes are coordinated by the Sustainable Development Department, led by the Vice President for Ecology and Industrial Safety. At the Board level, the Sustainable Development and Climate Change Committee is responsible for overseeing the development and implementation of environmental and social initiatives.

To enhance production efficiency and address external challenges, the Company implemented a number of HR and organisational changes in its governance structure in 2024.

Sustainability governance structure



Sustainability principles are integrated into the Company's operations and strategic planning, as outlined in [Nornickel's internal regulations](#).

In 2024, Nornickel's Board of Directors approved an updated [Environmental and Climate Change Strategy along with the Key Focus Areas of Carbon Neutrality](#)

to minimise environmental impact, manage climate-related risks, and advance the Company towards carbon-neutral production. To deliver on these ambitions, the Company developed programmes comprising over 150 specific initiatives, with projected costs for the 2023–2031 period estimated at more than RUB 500 billion.

At the same time, implementation of the Socially Sustainable Development Strategy, adopted in 2023, continued. The Company places particular emphasis on maintaining decent pay, creating comfortable living conditions, and providing opportunities for employee self-fulfilment and development. In addition, Nornickel continues to

strengthen its partnerships with the indigenous peoples of the Taimyr and Kola Peninsulas, supporting their culture, traditions, and way of life.

Sustainability projects that received the most funding in 2024:

- [Sulphur Project 2.0](#)
- Range of health and safety initiatives
- Made with Care programme
- Charitable projects
- Norilsk renovation
- Energy saving and energy efficiency projects
- Clean Norilsk



For more details on the projects, please see [Nornickel's 2024 Sustainability Report](#).

- an assessment of sustainability practices was conducted among a sample of Nornickel suppliers, with twice as many suppliers participating compared to 2023¹
- Nornickel received a number of awards for sustainability: three Responsible Business Leadership awards and recognition in the [Best ESG Projects in Russia competition](#).

The Company continues to actively participate in both Russian and international sustainability events. In 2024, Nornickel presented its innovative projects and environmental and social initiatives at various forums.

In 2024, Krasnoyarsk hosted the forth Siberian Perspective sustainability summit, organised by Nornickel with support from the National Council on Corporate Volunteering, the Russian Managers Association, and the Protected Areas Embassy charitable foundation. The summit focused on the ecology of Siberian cities as a key factor in regional development and quality of life improvement. More than 200 participants – including representatives from businesses, government authorities, expert communities, volunteers, and Nornickel suppliers – discussed collaborative efforts among municipalities, businesses, and

community stakeholders to enhance the urban environment, with a particular emphasis on its ecological aspects. The event highlighted Nornickel's commitment to sustainability principles and its ambition to improve local environmental conditions across the Company's footprint.

In 2025, Nornickel will continue advancing initiatives aimed at aligning its activities with national objectives and the requirements of leading international standards and guidelines. Plans include further integration of ESG principles into strategic planning, risk management, and reporting procedures, as well as the continued development and enhancement of the Company's human rights due diligence system.

Achievements and priorities

Environmental protection and climate change

- Launch of the second process line at Nadezhda Metallurgical Plant and verification of the Sulphur Project's effectiveness
- Lowest CO₂ emissions (Scopes 1 and 2) among global metals and mining peers
- Launch of the air quality monitoring system in Norilsk
- Issuance of carbon credits generated by the Company's climate project

Social responsibility

- Reputation as a socially responsible business (annual pay increases, talent development, attraction of young talent, and the extension of the collective bargaining agreement until 2027)
- Comprehensive support for local communities and national projects
- Long track record of supporting indigenous peoples; pioneering the process to obtain their free, prior, and informed consent to projects

Corporate governance

- Changing the management model to improve efficiency
- Developing the risk management system
- Integrating ESG targets into management KPIs
- Balanced and effective Board of Directors
- Widespread application of cutting-edge technologies
- Cooperation agreements with Russian software developers

Key achievements

Strategic priorities

- Achieving the key SO₂ reduction milestones for the Norilsk Industrial District
- Cleaning up legacy waste and remediating the environment following environmental incidents in Norilsk
- Assessing biodiversity impact and building a science-based case for a biodiversity conservation programme
- Further developing a framework for managing physical risks across the Company's footprint
- Supporting environmental initiatives across the Company's footprint

- Zero work-related fatalities
- Employee health and safety
- Preventing social risks related to the Company's operations
- Attracting young talent and experienced professionals and reducing the turnover rate
- Aligning living and working conditions with employee expectations
- Reducing the impact of operations on indigenous peoples across the Company's footprint
- Refurbishing housing and social infrastructure in Norilsk

- Further integrating sustainability principles into the Company's corporate culture
- Ensuring compliance with key Russian and international sustainability initiatives
- Developing a framework for managing climate-related risks and opportunities
- Building and scaling a responsible supply chain

The Company actively integrates sustainability principles into its corporate culture. For example, in 2024:

- Nornickel delineated the areas exposed to the environmental impact of its operations and studied the plant and animal species inhabiting the regions where it operates – the Taimyr and Kola Peninsulas as well as the Trans-Baikal Territory
- more than 24 thousand people completed a sustainability training course at the Nornickel Academy, and new courses on responsible supply chains and human rights were launched
- the Company continues to publish its [Sustainability Report along with separate reports on human rights, climate change, and responsible supply chain](#)
- stakeholder engagement plans for 2024 were developed and published at the divisional level

¹ The results of the assessment are disclosed in detail in the Company's [2024 Responsible Supply Chain Report](#).



Stakeholder engagement

Nornickel is committed to fostering continuous dialogue with its stakeholders. To achieve this, the Company uses various communication channels to take into account stakeholder interests and expectations, placing particular emphasis on feedback. It also monitors the actual and potential negative impacts of its operations, actively seeking to minimise them. To keep all stakeholders well informed, annual reports are published in accordance with international and national standards and guidance, and external assurance is used for the Company's Sustainability Report.

Social media engagement channels

Official Telegram channels:

https://t.me/nornickel_official

https://t.me/nornickel_Life

Work at Nornickel Telegram channel:

<https://t.me/rabotanornickel>

https://vk.com/nornickel_official

<https://ok.ru/nornickel>

<https://rutube.ru/channel/24161124/>

https://dzen.ru/id/6228aa0deaf2ac6625783852?share_to=link

https://ru.pinterest.com/nornickel_ru/

To increase transparency and raise stakeholder awareness, Nornickel actively employs multiple communication channels to advance its ESG agenda, effectively reaching all target audiences. Digital tools are used to measure audience engagement, identify the most relevant topics, and

adjust next steps in promoting the ESG agenda accordingly, as well as to collect feedback. The Company uses the most popular information channels among stakeholders, including its official website, Telegram channel, social media groups, local, regional, and federal media, and its corporate social network.

Key stakeholder groups: employees; government authorities; rating providers; shareholders, brokers, and analysts; customers and suppliers; local communities and NGOs.

For more details on stakeholder engagement, please see [Nornickel's 2024 Sustainability Report](#).

Partnerships and cooperation

Nornickel annually initiates large-scale research expeditions involving Russian scientists, local historians, and nature reserve personnel. These studies result in a comprehensive assessment of the local environmental conditions in the Arctic regions. They contribute to modern scientific knowledge of the Russian Arctic for scientific databanks, support new scientific discoveries,

and allow for the testing of latest research methodologies. In the first quarter of 2024, Nornickel supported a major artistic and educational initiative titled Explorer and Artist: Art on Expeditions, held in Zaryadye Park in Moscow. The project marked the completion of the second year of the Big Scientific Expedition, a collaborative effort between Nornickel and the Siberian Branch of the Russian Academy of Sciences. Dedicated to the study of the Russian Arctic, the project represented the first systematic attempt to reinvent scientific research in the Polar region – which hosts Nornickel's operations – through a cultural lens and artistic expression. The project culminated in a joint exhibition by Zaryadye Park, the State Darwin Museum, and the Stroganov Russian State University of Design and Applied Arts, with the support of Nornickel. This initiative offered a broad overview of the region's centuries-long history,

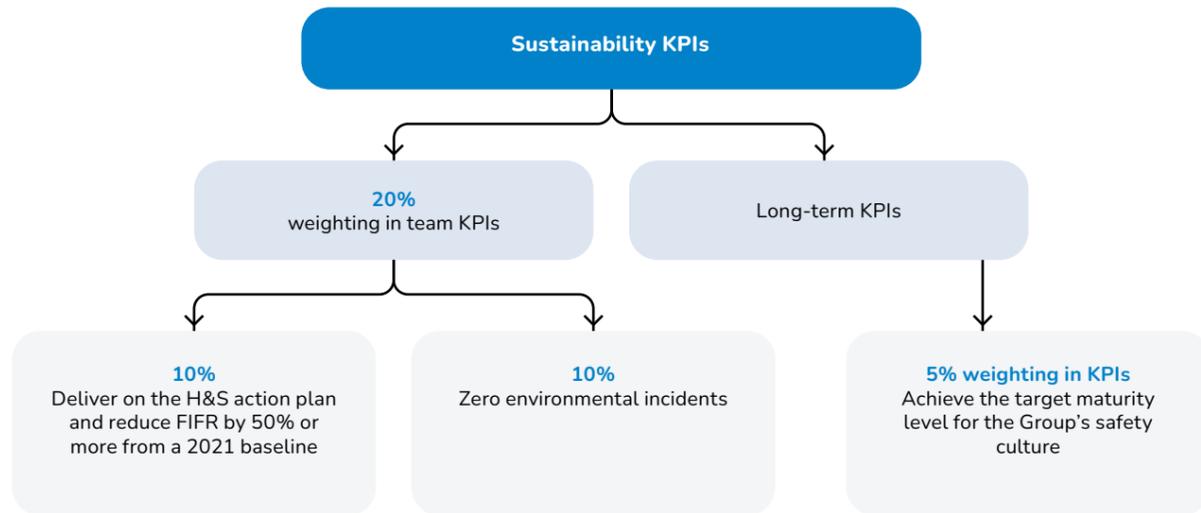
highlighted the significance of climate change in the Arctic, and provided a fresh perspective on the complex relationship between nature, humanity, and technology.

The March 2024 agreement between Nornickel and ROSATOM on the supply of next-generation radioisotope instruments marked another step in strengthening their partnership. Earlier, the two companies agreed to explore the potential for small-scale nuclear power to supply Norilsk's energy needs and are also collaborating on the development of Russia's largest lithium production facility in the Murmansk Region. The deployment of these next-generation instruments will significantly improve the precision and speed of production processes as well as enhance control over key operational parameters – all while driving a high level of automation and efficiency.

To further deepen the mutually beneficial, long-term partnership between the Company and the region, Nornickel signed an agreement with the Trans-Baikal Territory in November 2024. The agreement, effective until 2029, provides for the consolidation and coordination of collaborative efforts to support the sustainable social and economic development of the Trans-Baikal Territory and Nornickel's assets operating within the region. Under this agreement, the Trans-Baikal Territory plans to maintain its focus on fostering a favourable investment climate and supporting infrastructure-related investment projects, while Nornickel intends to actively develop its Trans-Baikal Division and is considering expanding production.



Sustainability management KPIs



ISO standards

Standards	ISO 14001:2015 – Environmental management systems	ISO 9001:2015 – Quality management systems	ISO 45001:2018 – Occupational health and safety	ISO/IEC 27001:2013 – Information security management systems
Group's ISO-certified assets	<ul style="list-style-type: none"> MMC Norilsk Nickel Kola site Foreign site Trans-Baikal Division 	<ul style="list-style-type: none"> MMC Norilsk Nickel Kola site Foreign site Research institute 	<ul style="list-style-type: none"> MMC Norilsk Nickel Kola site Foreign site Trans-Baikal Division 	<ul style="list-style-type: none"> Kola site Murmansk Transport Division Nadezhda Metallurgical Plant Copper Plant Talnakh Concentrator
Percentage of certified operations	51%	49%	53%	18%

Sustainability initiatives

Initiatives	Status
Together for Sustainability (TfS) initiative	The Company's compliance with the requirements of the initiative was confirmed by the 2022 follow-up audit
International Platinum Group Metals Association (IPA)	Member since 1999
Nickel Institute	Member since 2005
UN Global Compact	Member since 2016
Initiative for Responsible Mining Assurance (IRMA)	The Company is implementing a compliance roadmap ¹
ICMM's Mining Principles	The Company is implementing a compliance roadmap ^{1,2}
Global Battery Alliance (GBA)	Member since 2021
London Metal Exchange (LME)	In 2024, the London Metal Exchange accepted reports for five LME-listed Norinickel metal brands

ESG ratings and scores

Rating providers	Status
EcoVadis²	ESG score – 58
Sustainalytics	ESG risk score – 44.0 (out of 100), on a scale from 1 (low risk) to 100 (high risk)
Corporate Human Rights Benchmark	Score – 21.0 (out of 100.0)
ACRA	ESG-rating – AA, ESG-2, a very high ESG score
RAEX	ESG-rating – AA, a high ESG level
ESG Index by RBC and NCR	ESG level I (high)
Expert RA	ESG-rating – II (c), a very high level of compliance with sustainability goals when making key decisions. Outlook – stable
Expert magazine	No. 1, score – 192

¹ In 2022, cooperation with Russian companies was suspended.

² Ratings on Russian companies were suspended in February 2025.

Employees



HR policy

People are Nornickel's main value. The Company views its employees as its core asset and invests in their professional and personal development, provides them with safe and comfortable working conditions as well as decent pay and benefits package, and seeks to boost their performance and ownership of work-related tasks.

Average monthly pay
RUB 207 THOUSAND

Average headcount
78.7 THOUSAND

Percentage of employees trained
99%

Percentage of employees covered by collective bargaining agreements
94%



Creating a tolerant environment

The Company is committed to fostering a tolerant work environment free from any form of discrimination. Nornickel

guarantees equal opportunities in hiring, promotion, training, and remuneration for all employees, regardless of ethnicity, nationality, religion, gender, age, sexual orientation, marital status, special needs, or any other protected characteristic under applicable law.

The Company complies with all applicable legal requirements regarding the employment of people with disabilities. The quota for hiring such individuals is set at 2% of the average headcount. Nornickel provides these employees with suitable working conditions, including appropriate work and rest schedules and annual leave entitlements. Employees with disabilities can also apply for additional paid leave (three calendar days per year) and receive annual financial assistance from the Company of up to RUB 10 thousand.

Working conditions

The Company has adopted internal labour regulations, which are approved in consultation with the trade union organisation and establish employees' working hours. The Company has a standard working week of 40 hours, in line with applicable Russian labour laws and regulations. Employees involved in hazardous or dangerous work enjoy a reduced working week of not more than 36 hours. For women employed in the Far North and equivalent territories, the working week is also limited to 36 hours. The Company ensures accurate tracking of each employee's working hours.

Work on weekends and overtime is compensated additionally, in accordance with the Labour Code of the Russian Federation. Employees are granted paid annual basic leave, along with additional paid leave for those working in the Far North.

Employees with irregular working hours are entitled to three additional calendar days of paid annual leave.

The Company offers the option of entering into a remote (home-based) work agreement.

Human rights and social partnership

Human rights

The Company respects the rights and freedoms of its employees as well as those of its stakeholders – partners, investors, contractors, local communities, customers, and consumers.

Nornickel upholds the principles of international frameworks, such as: the UN Global Compact, the Universal Declaration of Human Rights, and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. The Company complies with the laws of the countries in which it operates.

Nornickel implements programmes for the development and social support of its employees, upholding their rights in respect of social security, education, family welfare, housing, freedom of artistic expression, and participation in cultural life.

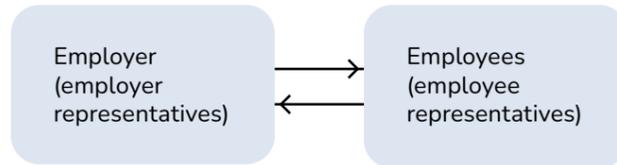
With respect to its employees, the Company strictly adheres to the following principles:

- Zero tolerance for the use of child labour, forced or slave labour
- Zero tolerance for the employment of persons aged under 18 for hazardous and/or dangerous work
- Zero tolerance for violence or discrimination
- The Company does not engage female employees in extreme or dangerous working conditions
- The Company ensures its employees' right to safe working conditions
- The Company makes sure all employees enjoy equal rights and opportunities regardless of gender, age, race, nationality, and origin
- The Company provides all employees with equal opportunities for unlocking their potential. Employee performance is evaluated on a fair and impartial basis, with hiring and promotion based solely on professional abilities, knowledge, and skills
- The Company respects the right to form trade unions and does not prevent employees from joining them

Human rights-related issues are resolved through labour dispute commissions, social programmes, compensations, and benefits commissions (which include employee representatives), and ethics commissions.

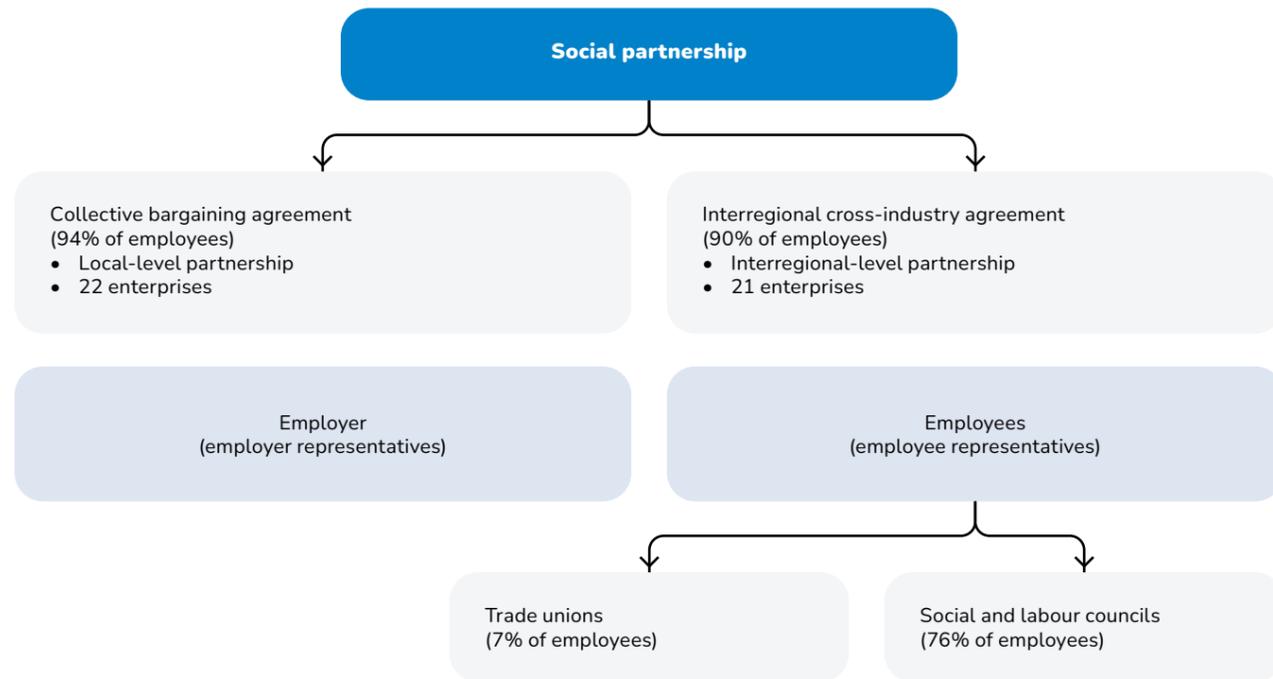
Social partnership at Nor Nickel

The Company maintains a social partnership framework designed to align the interests of employees and the employer in regulating labour relations and implementing social policy.



The interests of employees are represented by trade unions and social and labour councils. The interests of the employer are represented by the organisation's management and/or authorised representatives, and employer associations.

Social partnership framework



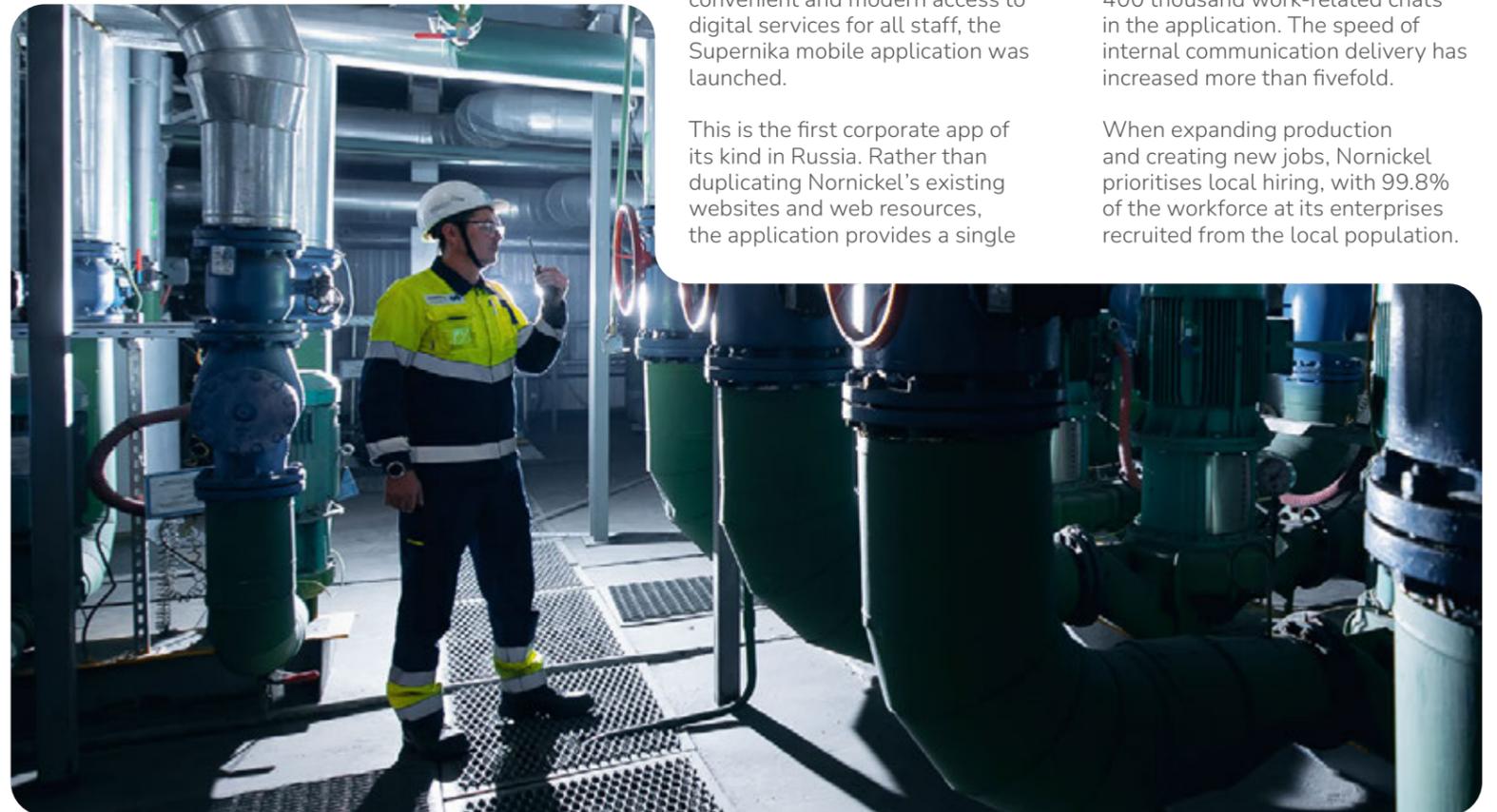
The Company has 58 trade unions, which are affiliated with regional trade unions. At the local level, the interests of employees are represented by social and labour councils. The trade unions and social and labour councils can raise matters relating to health resort treatment, recreation, and

leisure programmes for employees, disease prevention, provision of personal protective equipment, workplace and catering arrangements, and more. Trade unions also regularly participate in inspections of canteen food quality and assessments of employee working conditions.

Within the Company, social and labour relations between employees and the employer are governed by collective bargaining agreements at the local level and by an interregional cross-industry agreement at the interregional level.

In 2024, 22 collective bargaining agreements were in effect, four of which were extended for three years. This year, negotiations were held with trade unions regarding the conclusion of an Interregional Cross-Industry Agreement for copper and nickel producers and associated support enterprises. The agreement was signed for the period 2025–2028.

No breaches of collective bargaining agreements and no strikes took place across Group enterprises during the reporting year.



Employee communication channels

Multiple communication and feedback channels are available to our employees, including:

- the Corporate Trust Line
- regular information meetings
- the corporate intranet portal
- a mobile app
- suggestion boxes
- the Company's official social media accounts
- offices for operational, social, and labour-related matters located in the Norilsk Industrial District.

Due to the nature of their jobs, the majority (up to 75%) of Nor Nickel employees do not use personal computers at work. To facilitate convenient and modern access to digital services for all staff, the Supernika mobile application was launched.

This is the first corporate app of its kind in Russia. Rather than duplicating Nor Nickel's existing websites and web resources, the application provides a single

information environment for a geographically dispersed company, providing users with fast feedback options. The application has already consolidated over 40 services onto a single platform, from access to employee personal accounts to scheduling medical appointments and booking career counselling sessions.

The application also incorporates digital management tools, such as talent development tracking, KPI setting, and evaluating the performance of one's subordinates – all available anytime, directly from a smartphone.

The app currently has over 65 thousand registered users, representing 83% of the workforce. Employees have created over 400 thousand work-related chats in the application. The speed of internal communication delivery has increased more than fivefold.

When expanding production and creating new jobs, Nor Nickel prioritises local hiring, with 99.8% of the workforce at its enterprises recruited from the local population.

Employee opinion survey



Nornickel conducts regular targeted surveys to assess employee engagement in various programmes and gauge employee satisfaction levels.

In 2024, the engagement survey covered over 58 thousand Company employees, representing an increase of 997 participants compared to 2023. The employee engagement rate in 2024 was 67%, consistent with both the previous year and the industry benchmark. Nevertheless, upward trends were observed across almost all engagement metrics, suggesting a positive shift in employee perceptions of Company initiatives in these areas.

The most notable increases across engagement metrics in 2024 were seen in: Collaboration (+5 p.p.), Work-Life Balance (+4 p.p.), and Autonomy (+4 p.p.).

A significant step forward was the increased employee satisfaction with reward and recognition factors. Employees express satisfaction with the bonus system, including bonuses

awarded for professional holidays, and the salary review process – all of which contribute to a sense of stability within the Company. At the same time, Nornickel recognises the need to simplify work processes and the incentive system to ensure fairer distribution and enhance wage competitiveness.

The survey results prompted the implementation of over 500 initiatives, 57% of which focused on improving current working conditions, business processes, and employee development.

Special attention was given to enhancing the volume and quality of internal communications, refining the rewards and bonus system, attracting young talent, fostering talent development, and strengthening social partnerships. Throughout the year, the Head Office provided additional support to the enterprises through collaborative efforts such as joint reviews with CEOs, meetings with local unit employees, and the development of action plans at the line-manager level.

Special focus was also placed on implementing socially significant initiatives, including support for cultural and sporting events, as well as the introduction of digital financial assets aimed at strengthening employees' sense of connection to the Company's achievements.

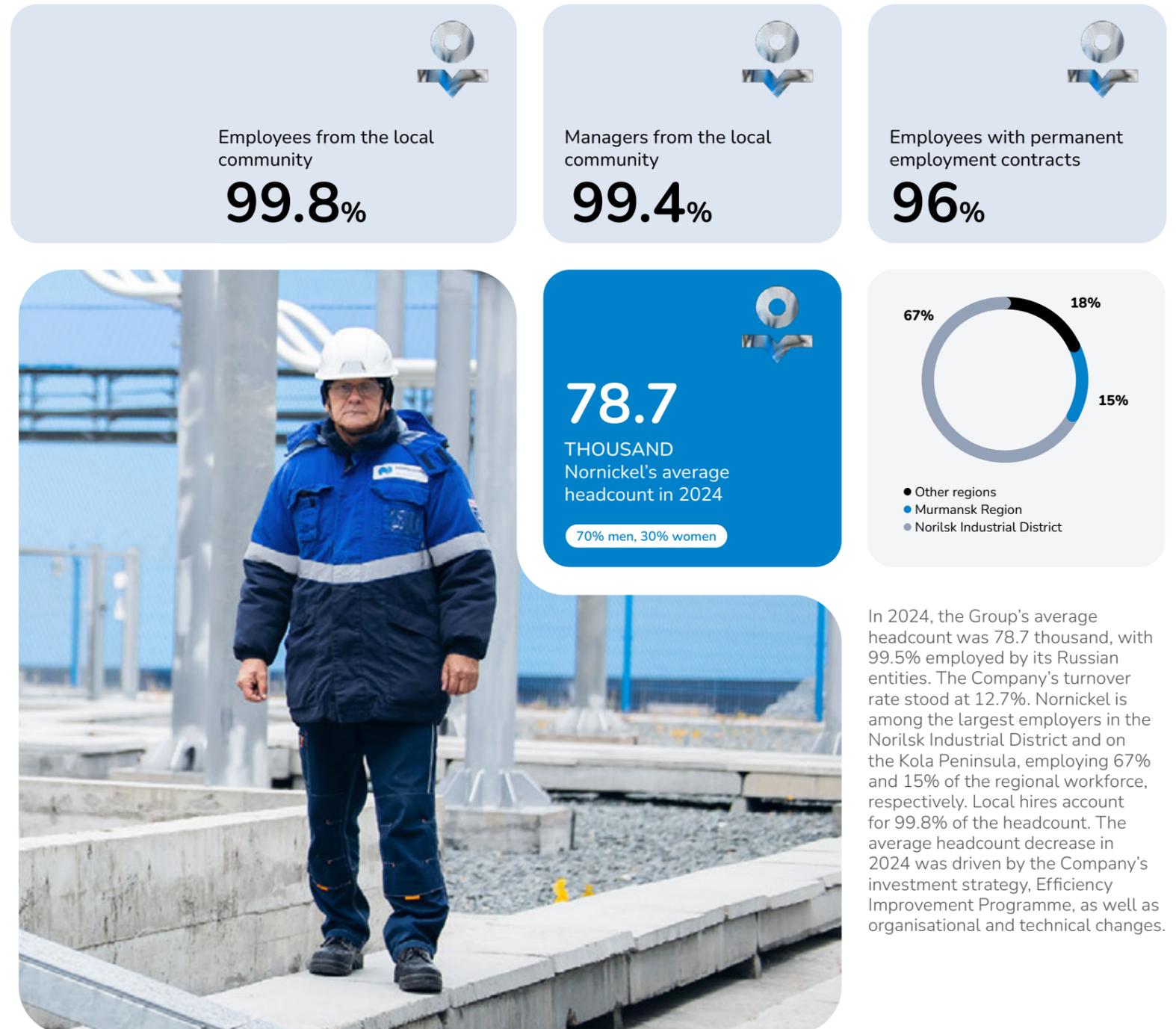
To address the needs of units at-risk, a dedicated methodology for conducting shop-floor workshops was developed and rolled out. In addition, 20 internal moderators were trained to lead these sessions.

In response to a management request, pulse surveys assessing employee engagement were conducted at selected enterprises in September and October.

Efforts also continued to improve cross-functional collaboration, which – according to correlation analysis – is associated with both workflow efficiency and employee perceptions of senior management. This is a key factor in fostering a positive team environment and supporting employee retention.

In this way, Nornickel continues to strive for better working conditions and internal collaboration – elements that remain critical to sustainable development in an increasingly dynamic and evolving business environment.

Staff composition



In 2024, the Group's average headcount was 78.7 thousand, with 99.5% employed by its Russian entities. The Company's turnover rate stood at 12.7%. Nornickel is among the largest employers in the Norilsk Industrial District and on the Kola Peninsula, employing 67% and 15% of the regional workforce, respectively. Local hires account for 99.8% of the headcount. The average headcount decrease in 2024 was driven by the Company's investment strategy, Efficiency Improvement Programme, as well as organisational and technical changes.



Average headcount trend (PEOPLE)

Location	2020	2021	2022	2023	2024
Russia	71,447	73,061	77,980	80,166	78,308
Africa	519	151	38	47	44
Europe	323	317	331	322	323
Asia	15	15	15	22	63
USA	10	10	10	5	0
Australia	5	3	0	0	0
Total	72,319	73,557	78,374	80,562	78,738

Breakdown of employees by age group and employee category (%)

Indicators	2022			2023			2024		
	M	F	Total	M	F	Total	M	F	Total
Age group									
<30 years	11	4	15	11	4	15	10	4	14
30–50 years	46	20	66	46	20	66	45	20	65
>50 years	13	6	19	13	6	19	14	7	21
Employee categories									
Managers	12	4	16	12	4	16	11	3	14
White-collar employees	10	11	21	11	12	23	12	14	26
Blue-collar employees	50	13	63	48	13	61	47	13	60

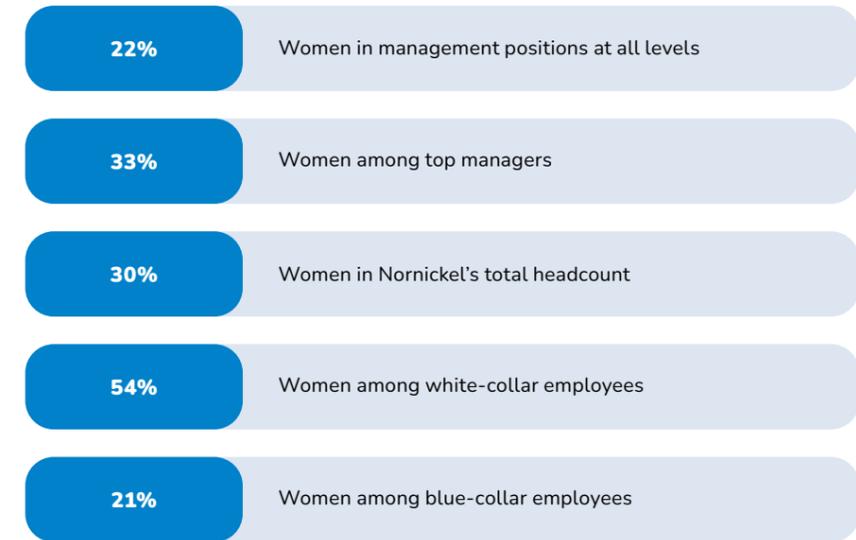
Breakdown of employees by education level (%)

Education level	2020	2021	2022	2023	2024
Higher education	37	39	39	40	40
Secondary vocational education	20	21	22	23	24
General secondary education	26	23	23	23	22
Other	17	17	16	15	14



Gender equality

The Company is committed to providing equal opportunities for professional and career growth to all employees, regardless of gender. Due to the predominantly production-based nature of Nornickel's operations, its workforce is primarily male. Nevertheless, the Company promotes gender diversity across both its production and administrative units, taking into account the particular requirements of its business profile.



Nornickel provides the following social benefits to its female employees:

- They are not engaged in heavy labour
- They are entitled to childcare leave until the child reaches the age of three
- Pregnant employees are not subject to business travel, overtime, night shifts, or work on weekends and public holidays (exceptions are allowed only with the employee's written consent and in the absence of medical contraindications)

- Termination of employment initiated by the employer is prohibited for pregnant women, women with children under the age of three, and single mothers with children under eighteen, except in cases of enterprise liquidation
- Their job is protected during childcare leave, and a reintegration programme is in place to support their return to work
- Voluntary health insurance (VHI) coverage continues during childcare leave, with the option to enrol family members in the corporate VHI plan
- Support programmes for expectant and new mothers are offered under the Mother at Work project. This programme provides a comprehensive platform that consolidates all social support practices available to families with children

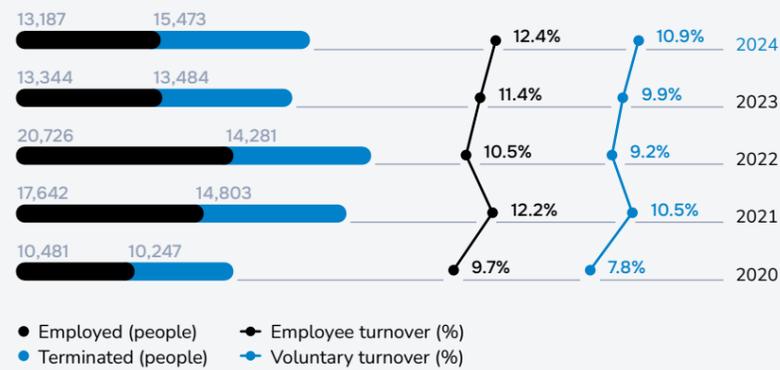
- Employees also have the option to enrol their children in the corporate VHI plan at a discounted rate.

In 2021, Nornickel, together with a number of partner companies, established the Women in Modern Industries association, which now boasts a membership of over 6 thousand women.

The association hosts regular webinars, supports a mentoring programme, and organises the annual Talented Woman in Modern Industry Award, giving participants a platform to share their achievements and gain broader recognition.

Recruitment

Employee turnover



The Company employs a comprehensive approach to recruitment, aiming to provide equal hiring opportunities for all candidates while attracting talent from across Russia and training them to match its production needs. In 2024, new hires accounted for 17% of the total workforce. The Company operates an internal corporate university, offering a wide range of programmes focused on professional development and the acquisition of new skills. Internal candidates have a priority when filling vacant positions.

All vacancies in the Company are posted on public resources and on the intranet portal. Applicants can submit their CVs by e-mail, contact the 24/7 call centre, or visit HR support centres located in Norilsk, Ufa, Orsk, and Irkutsk. Every applicant receives feedback following the review of their submission.

The Company also continues to run a rehire programme for former employees. As part of this initiative, in 2024, former staff with in-demand, priority skills were

contacted by phone, resulting in the successful rehiring of 60 individuals. During 2024, 890 former employees rejoined the Company.

Some units at the Norilsk site operate on a rotational shift basis. In 2024, 1.8 thousand employees worked under this system, primarily crane operators, electricians, drivers, and technicians.

Training and career advancement



The Company places a strong emphasis on employee upskilling as well as professional growth and development, guided by the principles of accessibility, innovation, and relevance. In 2024, the Company continued to foster a culture of continuous learning and expand an accelerated training ecosystem to boost professional excellence and enhance and build managerial, corporate, and critical competencies.

In 2024, the percentage of employees trained increased by 5%, reaching 99% of the total headcount. Of the total training provided, 59% was dedicated to building critical skills, while 38% focused on professional competencies.



Outplacement following an asset closure

Upon the closure of an asset, the Company developed a comprehensive support programme for employees affected by redundancy – tailored for both those who chose to resign and those who opted to transfer to other Company

units. The former receive support payments, while the latter benefit from a comprehensive package of measures that includes assistance in finding internal vacancies, training for new roles with salary retention, and reimbursement for relocation

and housing rental costs if the new position is in a different city. The programme was developed in coordination with the social and labour council and primary trade union organisations.

Employee training statistics

Indicators	2022	2023	2024
Employee training costs (RUB mln)	1,447	1,277	1,270
Training costs per employee (RUB thousand)	21.1	16.8	16.3
Total number of employees trained (people)	68,500	75,971	7,820
Percentage of employees trained	87.4%	94.3%	98.8%
Hours of training per year per employee	85	88	126
Employees promoted (people)	N/A	4,156	3,791
Percentage of employees with upgraded qualifications	N/A	65%	64%

The Company's primary training platform, the Corporate University, provides a combined digital and physical environment to facilitate continuous employee development. It is fully equipped with the necessary infrastructure to meet its purpose.

In Norilsk, employee training takes place both in classrooms and at an underground training facility located within operational workings of the Anhydrite shaft at Kayerkansky Mine, as well as at a training and production facility featuring a simulator complex. This facility is used for instructing employees in safe work practices at heights and in confined spaces. Employees at the Kola site receive their training at the Corporate University's branch in Monchegorsk.

Training is offered in over 300 blue-collar jobs, supplemented by approximately 90 continuing professional education programmes and 80 additional training activities. In 2024, over 73 thousand Company employees received training at the Corporate University.

Digital training tools, such as the Nornickel Academy platform, have become commonplace for Nornickel employees. The platform offers training courses to develop professional and management skills and provides insights into modern trends and tools as well as expert advice. In 2024, Company employees completed more than 178 thousand courses, of which 75 thousand were completed through self-directed learning.

In collaboration with Alpina Publisher, Nornickel continues to develop a digital reading room, which currently offers over 10 thousand

books free of charge. Employees spent more than 760 thousand hours reading in 2024.

The Company promotes a culture of continuous learning, organising major educational events, such as Biblionight and Knowledge Day, as well as open lectures and master classes. In addition, the P2P learning¹ project Tribuna allows employees to share their expertise and act as internal subject matter experts.

The Company actively supports the development of a talent pool for managerial roles at all levels – from line managers to senior executives. In 2024, 2 thousand employees were included in the talent pool for line management positions. A new Self-Nomination to the Talent Pool service was introduced, allowing employees to apply directly for inclusion.

The pool for middle and senior management positions is formed through HR committees and, in 2024, comprised nearly 2.5 thousand individuals. As much as 90% of senior management positions are filled through internal promotions.

Building practical skills

The Company's training system places special emphasis on the acquisition of practical skills and competencies for the effective and safe operation of high-tech equipment. The Monchegorsk branch of the Corporate University features a virtual reality (VR) classroom, while the Norilsk site hosts a comprehensive set of advanced facilities, enabling employees to safely master complex skills for working in hazardous environments. Using VR simulators, employees learn to properly use personal protective equipment and

safely navigate underground mine workings. 3D virtual reality training simulators, powered by immersive technologies, allow for realistic visualisation of mine infrastructure and simulation of actual underground machinery operations. Approximately 350 employees underwent simulator-based training in 2024.

Over 200 operators of underground self-propelled machines also receive annual hands-on training at the underground training facility located at the Anhydrite shaft of Kayerkansky Mine, which ranks among the top 15 industrial tourism destinations. Preparations are currently in progress to implement unmanned mining technologies, employees are also being trained to operate machinery and equipment using remote-control technologies.

Since 2023, practical exercises for working at heights using various types of safety equipment have been held at a modern training facility specifically designed for Nornickel. This facility was developed based on the Company's individual specifications and tailored to its production conditions and safety requirements. In 2024, over 4 thousand employees were trained using this simulator system – nearly double the number trained the previous year.

360-Degree Management

For the past five years, the Company has been implementing a development programme for employees who have successfully completed the 360-degree assessment. In 2024, the 360-Degree Management programme incorporated both in-person and online training and

involved both internal and external trainers to deliver a comprehensive curriculum focused on the development of corporate and managerial skills. Participants chose their training topics independently, based on the assessment results, performance dialogue with their supervisor, and individual development plans.

In 2024, the programme comprised 75 training sessions (+27% y-o-y) involving over 1.7 thousand employees (+59% y-o-y) and eight online workshops that received a total of 5.5 thousand views.

School of Leadership

The Company maintains a strong commitment to the development of its managers. In 2024, a tailored development programme was implemented for managers at every leadership level.

For middle management, the School of Leadership training programme continued, offering participants the opportunity to enhance their team management skills. This crash course comprises four online modules and one three-day in-person module, the Leadership Workshop, where participants practice their newly acquired knowledge. The programme focuses on transforming routine approaches to thinking, acting, and interacting with colleagues.

One of the pressing tasks in the reporting year was the launch of a development programme for line managers and supervisors, aimed primarily at improving understanding of their management role and developing their management skills. Given the large number of participants (Nornickel employs over 6.7 thousand line managers and

supervisors), an innovative solution was introduced: an AI-powered chatbot integrated into the Supernika corporate app, which enables training anytime and anywhere. Besides, interaction with artificial intelligence helps employees get a grasp of modern digital technologies. This programme reached over 3.1 thousand line managers and supervisors in 2024.



In 2024,
582
MANAGERS
were trained under
the programme

Mentoring

In 2024, the Company continued to foster a culture of managerial mentorship. Top-100 managers holding ICF CCE international certificates acted as mentors to high-potential employees.

Furthermore, in 2024, managerial knowledge was shared through inter-level dialogues, cascading from senior to middle management. Middle managers enhanced their coaching capabilities through participation in the Power of Words programme and took on roles as leadership coaches. These leadership coaches now deliver regular management development workshops for line managers.

Assistance

Since the Company's production sites are located in remote areas, Nornickel actively sources staff from other regions of Russia. To help employees better adapt to a new environment, Nornickel launched the Assistance programme, targeting not only highly skilled talent and managers but also young specialists and talent with hard-to-find skills. All employees relocating to Taimyr are provided with comfortable accommodation and receive reimbursement for relocation and resettlement expenses.

In 2024, the Company made a decision to significantly expand the programme's footprint. Starting in 2025, the programme will be extended to the Murmansk Region, cities in the Krasnoyarsk Territory, and the Novosibirsk Region.



Among middle
managers
40 INDIVIDUALS
were appointed as leadership
coaches

¹ Peer-to-peer (P2P) learning is a method of knowledge transfer in which experienced learners share their expertise with less experienced colleagues.

Relocation programme

The employee relocation programme has been in place since early 2022. It offers support to all employees relocating to another region, whether they remain with their current employer or are transferred to other units within the Group. In addition to standard reimbursements for travel, baggage transport, accommodation, subsistence expenses, and additional leave for settling in, employees receive a supplementary relocation allowance of up to 40% of their salary, depending on the destination.

Relocating to a new place of work unlocks opportunities for employees' personal and professional growth, while enabling the Company to fill vacancies in cases where there are no sufficiently qualified candidates available in the internal talent pool or the regional labour market.

Today, the programme supports nearly

5 THOUSAND NORNICKEL EMPLOYEES,

including 1.3 thousand new hires who joined the Company in 2024



In Good Company

Nornickel's youth programme, In Good Company, was created to unite employees aged under 35 and foster their professional and creative growth across a variety of areas and disciplines. The programme's additional objective is to identify talented students and young talents outside the Company, attract them to join Nornickel, and make their onboarding as fast and successful as possible.

The programme was designed with the demands of young employees in mind based on the analysis of employee expectations (recognition, self-fulfilment, and experience) as well as the relevant needs of the Company (boosting engagement and fostering the development of talent, skills, and overall personal potential).

Currently,

82 NORNICKEL EMPLOYEES

are covered by the programme, including 11 who joined in 2024



It offers participants a wide array of opportunities across four distinct tracks: professional practice, growth, social practice, and creativity, making it a versatile platform for individual involvement.

The programme is delivered in cycles during official corporate events, but participation also extends beyond these moments. Employees are encouraged to initiate and execute their own projects, earning points that can be redeemed for useful rewards.

As part of the programme, the Company developed a secure proprietary mobile app styled as a social network, where users can select any number of tracks and activities, expand their social circles and interests, and interact freely – regardless of job title, speciality, or location.

In 2024, the Company hosted the Safe Safety case competition for its young employees, which received 596 applications. Participants were grouped into 75 cross-functional teams to develop ideas addressing real challenges faced by Nornickel's H&S function. The case championship concluded with a live broadcast showcasing the most exciting solutions.

Career guidance

The Company places strong emphasis on career guidance for school students and young people, both in the cities where it operates and throughout Russia.

For schoolchildren, the Company developed a unique educational platform, Nornickel's City of Occupations, a digital encyclopaedia that features an interactive map with game elements such as quizzes, quests, and a conversational bot. The map includes descriptions of 147 different occupations and offers a career guidance test to identify a "candidate's" strengths and weaknesses. The platform also features guidance materials for

parents to support them in helping their children choose a career path. In 2024, career guidance classes such as Arctic Miners, Welcome to the City of Occupations, and Metal Detectors were held for more than 6 thousand school students in Norilsk and 230 in Monchegorsk.

For university students across Russia enrolled in programmes aligned with Nornickel's workforce needs, the Company runs a four-week online course called Conquerors of the North. In 2024, more than 2.6 thousand students applied for the programme, with 841 completing the programme and 100 top performers recommended for internships at the Company.

The forth stream of the First Arctic programme – aimed at building the leadership potential of university graduates – was launched in 2024. A total of 323 applicants were evaluated, with 20 top performers selected for employment.

In total, 821 students completed industrial placement and pre-graduation internships at the Head Office, in Norilsk, and in Monchegorsk. Another 574 students took part in paid internships through the Profstart and Polar College programmes, while 174 students joined temporary construction roles in Norilsk as part of student brigades. From among participants of Profstart and Polar College, 132 graduates were hired by the Company in 2024. Altogether, 1,569 students completed internships and work placements with Nornickel over the course of the year. In addition, Nornickel supports federal youth engagement programmes, such as the I Am a Professional Olympiad and the Metal Cup case competition.

In 2024, the Company broadened the eligibility criteria for its scholarship programme, resulting in **469** STUDENTS receiving scholarships



Remuneration and incentive system

Key performance indicators

Nornickel's remuneration system is based on the achievement of key performance indicators (KPIs), which include metrics related to financial performance, social responsibility, occupational safety, environmental safety, and operational efficiency, while also addressing cross-functional stakeholder interests. In 2024, more than 17 thousand Group employees were assessed against KPIs.

The KPI framework ensures a uniform approach to employee performance evaluation, helps prioritise annual targets for managers and staff in line with the Company's strategy, and links remuneration directly to individual results.

Under the annual bonus programme, both team-based and individual KPIs are set for the calendar year.

These KPIs are documented in a KPI scorecard, which reflects performance at both the Group and enterprise levels. The ratio of team to individual KPIs is determined by an employee's grade and role. As a result, the Company's overall performance has a direct impact on the actual bonuses earned by employees whose compensation is KPI-based.

Under the long-term incentive programme, key executives are assigned a standard set of KPIs over a three-year cycle.

In addition, a **project-based incentive scheme**, is in place to motivate and retain key personnel involved in capital investment projects. Bonuses are awarded based on the achievement of key project milestones, **with payouts aligned to successful project delivery.**

At 34 Group enterprises, the Company also conducts automated 360-degree assessments.

Based on these assessments, employees receive feedback from their managers, identify areas for development, and draw up individual development plans for the coming year. In 2024, assessments were conducted for over 11 thousand employees across all levels – from senior managers to specialist roles.

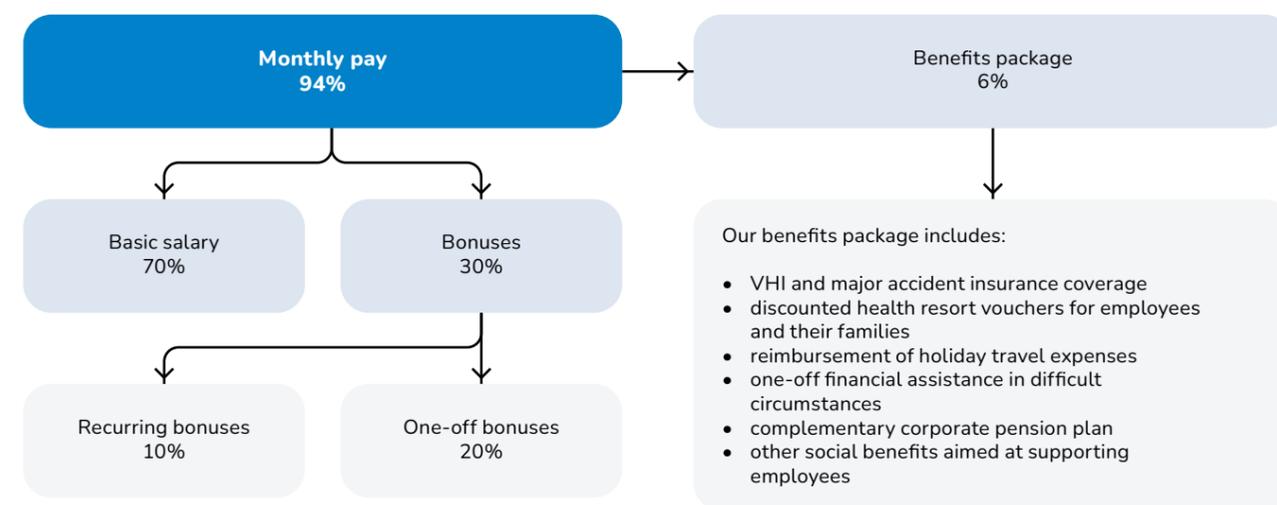


Remuneration is governed by the Company's compensation policy and comprises both a basic salary and a benefits package. In its turn, the basic salary includes fixed

and variable components. The variable component is linked to the Company's overall performance and KPI achievement as well as progress of investment projects. It may also

include one-off bonuses awarded for the successful completion of one-off tasks that deliver an economic benefit.

Employee compensation package breakdown



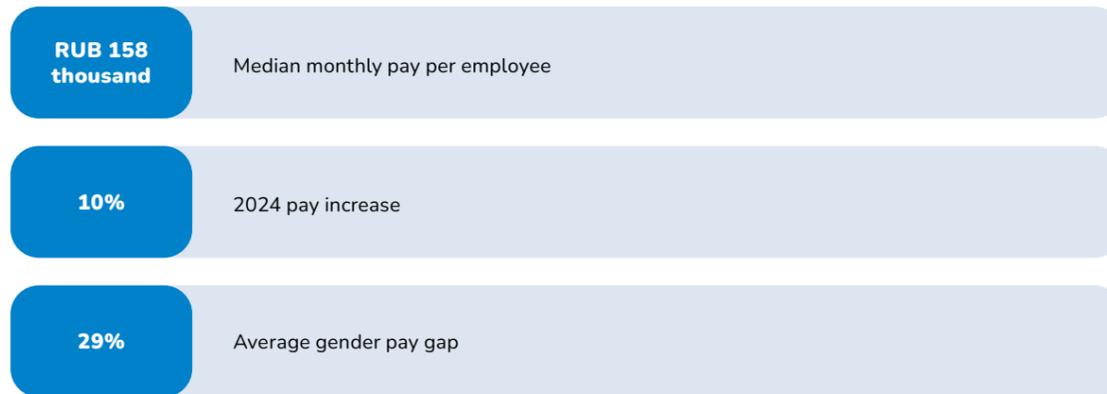
Nornickel has implemented a grading system, which serves as a vital tool for the development and rollout of various HR programmes. Positions are evaluated using a point-factor method, which considers the required

knowledge and skills, the complexity of responsibilities, and the level of accountability associated with each role. A job's grade level determines the size of the fixed salary and

annual bonus, the VHI package category, and other elements of the overall compensation package.

Remuneration

Salaries at Nornickel are determined regardless of gender, age, race, nationality, origin, or religion.



Indicators	2023			2024		
	M	F	Total	M	F	Total
Average monthly pay per employee	196,666	145,854	184,139	221,163	171,675	206,968
Average monthly pay for managers	376,054	328,216	392,510	463,055	421,055	454,091
Average monthly pay for blue-collar employees	145,851	92,772	134,713	160,797	100,072	148,243

Yearly pay review

The Company conducts regular reviews of pay levels and trends, taking into account inflation rates. Based on these assessments, annual salary adjustments are made in line with the regional consumer price index. In 2024, a one-time salary adjustment was implemented, averaging 10%. Employee salaries at the Company are consistently above the minimum wage rate (MWR) in all regions where it operates.

Employee incentive programmes

Nornickel has a comprehensive employee incentive system in place, aimed at improving operational efficiency and labour productivity, driving strong performance outcomes, and retaining highly skilled talent.

Digital Investor

In 2024, the Company continued rolling out its Digital Investor programme – a one-of-a-kind initiative in the Russian market – by launching the Tenure module as part of its second cycle. This programme represents a new model of engagement between the employer and employees. Under the programme, Nornickel fully covered the cost of purchasing digital financial assets (DFAs), a new type of blockchain-based investment instrument. The issuance and circulation of DFAs are carried out on dedicated platforms under the supervision of the Bank of Russia.

Employee pay vs MWR by operating region (RUB)

Regions of operation	Established minimum wage rate	Average monthly pay at Nornickel
Norilsk Industrial District (NID)	50,029	206,328
Murmansk Region	44,257	142,008
Krasnoyarsk Territory (excluding NID)	34,636	111,888
Trans-Baikal Territory	28,863	180,366
Moscow and other regions of Russia	20,000	366,512



Nornickel's DFAs are called minetokens. Each minetoken is pegged to the value of 100 Company shares¹ at both the time of issuance and redemption. The new module targets newly hired Nornickel

employees who have not previously participated in earlier cycles of the programme. The number of DFAs granted to each employee is based on their length of service with the Group as of 1 January 2024.

Length of service, years	Number of DFAs
Up to 1	0
1–4	2
5–9	4
10–14	6
15–19	8
Over 20	10

Under the programme, minetoken holders may sell their tokens one year after receipt to investors registered on a dedicated platform. After five years, the DFAs will be automatically redeemed, and their holders will receive a cash payment equivalent to the market value of the corresponding number of Nornickel shares at the time of redemption. Until the DFAs are redeemed, minetoken holders are entitled to periodic payments equivalent to the dividends declared on Nornickel shares.

This means that the remuneration of Nornickel DFA holders is directly tied to the Company's market capitalisation, thereby providing additional motivation for strong individual and team performance.

In connection with the launch of the Tenure module, the Company rolled out an updated awareness campaign explaining all aspects of the instrument, including a hotline, official website, and quick-reference guides. In parallel, Nornickel continues to run a series of webinars led by leading financial experts, focusing on financial literacy and investment skills. A dedicated training programme and updated online education module are also available to employees. Over the two years since the programme's launch, more than 250 HR professionals have been trained to serve as programme ambassadors and experts across all Nornickel enterprises. Additionally, 45.6 thousand employees have completed the Tsifronikel and Nornickel Academy training courses.

In January 2024, the programme distributed its scheduled periodic payments, with 51.3 thousand employees receiving RUB 796.33 per DFA (after tax).

By the end of 2024, more than 69.5 thousand Nornickel employees had become digital investors, having received their minetokens.

According to a survey of over 5 thousand employees, 82.3% of respondents agreed that participation in the programme helps them better understand how their individual performance aligns with the Company's goals.

Employee recognition

To enhance motivation and acknowledge employee achievements, Nornickel has established a multitiered reward and recognition system encompassing government, ministerial, and agency awards, regional and municipal honours, as well as corporate and internal recognitions.

Nornickel's Award Policy is closely linked to its values and strategic priorities. Employees are recognised for exceptional performance, the introduction of innovations that promote Company growth and generate additional economic value, as well as for contributions that significantly improve operational efficiency at a specific Group enterprise or go beyond formal contractual obligations in a way that benefits the business.

The Company traditionally acknowledges employee achievements through corporate awards, which are accompanied by a one-time cash payment. Nornickel's Badge of Honour, the Company's highest corporate distinction, not only includes a lump-sum reward but also entitles the recipient to a lifetime monthly corporate pension. In addition, internal awards are granted by individual enterprises to recognise employees' achievements at the local level.

In 2024, a total of
4,377
EMPLOYEES
were recognised through the Company's reward programmes

A new non-financial form of recognition was also introduced in 2024: the Letter of Gratitude from the Vice President. This initiative enables the Company to promptly deliver senior-level recognition of individuals or teams for long-standing dedication, outstanding contributions, or special occasions such as anniversaries or retirement.

¹ In 2024, Nornickel did a share split, converting each ordinary share into 100 new shares. This adjustment was reflected in the DFA structure. While the number of DFAs in an employee's wallet remains the same, the value of one DFA now corresponds to 100 Nornickel shares. Employees can view the current monetary value of their DFAs directly in their personal accounts.

Social programmes for employees

Nornickel has a comprehensive social support system for its employees, which includes a wide range of benefits and programmes.

Employee-related social expenses (RUB MLN)

Indicators	2022	2023	2024
Health resort treatment ¹	2,481	2,499	2,495
Travel expenses	3,386	3,691	3,643
VHI	2,189	2,577	2,211
Pension plans	1,188	1,238	1,446
Housing programmes	1,065	813	1,117
Benefits and guarantees	978	1,377	1,314
Assistance for former employee	421	403	446
Other	3,546	3,845	3,806
Total	15,254	16,443	16,478

Sports programmes

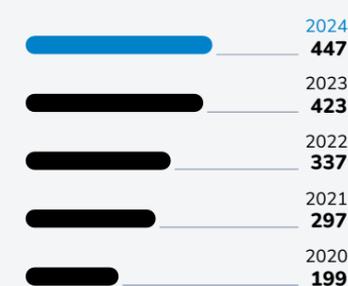
Another important social support programme run by Nornickel is the promotion of corporate sports and

healthy lifestyles. The programme is aimed at improving quality of life, enhancing the Company's employer brand, and making sports more accessible to employees and local communities in its regions of operation.

the Business Champions League, and competitions held by the Corporate Sports Development Association.

In 2024, the large-scale Nornickel: Hooked on Sport project was rolled out across the entire Group. A mobile app was developed for project participants to help each employee stay physically active, maintain a healthy diet, manage stress effectively, and feel more fulfilled in both life and work. The total number of participants exceeded 4.8 thousand. During the year, sports and wellness events reached 32.5 thousand employees, while live broadcasts of corporate competitions attracted more than 51 thousand views.

Sports expenses (RUB MLN)



Nornickel regularly holds sporting events and corporate competitions, including annual spartakiad competitions, in the regions where it operates. Hockey, futsal, volleyball, basketball, alpine skiing, snowboarding, swimming, and family sports competitions are among the most popular activities with employees. For many years, Nornickel employees have actively participated in Night Hockey League tournaments,

The Company provides annual reimbursements (above the current statutory minimum) for round-trip holiday travel and baggage fees for employees and their family members residing in the Far North and equivalent territories. Health improvement programmes.

Health resort

Health resort treatment and health improvement programmes for employees and their families are among the most sought-after components of Nornickel's social policy in the Far North regions.

In 2024, 17.6 thousand employees and their family members received treatment at the Zapolyarye corporate health resort in Sochi

as part of the Company's health improvement programmes, while another 7 thousand employees visited other health resorts, including over 1.6 thousand children who stayed in children's health camps. The Company reimburses, on average, 86% of the voucher cost for employees.



Insurance programmes

VHI

Family member

- Employees can take out a policy at the corporate rate for one close relative

The Company has a VHI programme in place covering all Group employees. In addition, employees can take out a policy at the corporate rate for one close relative.

Company employees

- Full coverage at the Company's expense
- All employees with primary employment at the Company, including those currently on maternity leave if they were hired under fixed-term contracts prior to the leave

Employees residing in the Far North are entitled to medical assistance under a VHI policy in these regions and beyond. All insurance programmes offer the same range

of services, with only the level of clinics and covered regions differing depending on the employee category.

As part of the VHI programme, the Company offers its employees a unique opportunity to take a human genome sequencing test. The test provides the most comprehensive personalised information about one's body characteristics and identifies the risks of significant diseases. Using these data, employees can take steps to minimise the likelihood of health problems. By the end of 2024, almost 22 thousand employees took part in this programme.

¹ Health resort treatment expenses include partial reimbursement for the cost of vouchers for employees and their family members as well as travel expenses to children's health camps. The cost of vouchers for trips abroad also covers round-trip transportation from a Russian border crossing point to the vacation destination.

Personal accident insurance

This personal insurance programme, available throughout Russia, provides monetary compensation to the insured in the event of harm to their life, health, or ability to work.

International travel insurance

The international travel insurance policy covers the medical expenses of insured individuals within a predefined limit and is provided free of charge to all participants in the Company's corporate VHI programme..

Corporate healthcare

The Corporate Healthcare project supports the development of private healthcare as a complement to the public healthcare system in the Company's key regions of operation – the Norilsk Industrial District and the Kola Peninsula. Its primary goal is to provide high-quality, affordable medical care to employees and their families. The project's total budget exceeds RUB 10 billion, with implementation scheduled until 2030. As part of the project, the Company is modernising and upgrading corporate healthcare facilities and medical examination rooms located at Company sites, while also establishing new medical centres in the cities where it operates.

Nornickel's first corporate medical centre opened in Norilsk in 2021, serving patients under the voluntary health insurance (VHI) programme. Today, the centre offers 237 types of medical services across 14 primary care specialties. The average wait time for appointments ranges from seven days to one month, demonstrating the high local demand for quality medical care.

In 2024, the Company continued to expand its healthcare footprint at the Norilsk and Kola industrial sites. Shop-level medical units were launched to support disease prevention and deliver high-quality medical care to employees directly on-site.

Since the project launch in 2019, a total of 35 medical facilities have been commissioned. Work is currently underway to open new medical centres in Talnakh and Kayerkan.

The Company also rolled out its Digital Healthcare programme to deploy innovative IT solutions in medical technology. The programme was introduced at the Zapolyarye corporate health resort in 2021 and in Norilsk in 2022. A mobile app was developed and launched, enabling employees to access their medical records, book doctor appointments, and receive all necessary information about clinic services. Nornickel continues to digitise key medical records and is working to create self-diagnostic systems and a disease risk assessment system.

Pension plans

Nornickel offers its employees private pension plans. Under the Co-Funded Pension Plans, pension savings are co-funded by the employee and the Company on a parity (equal) basis. This allows the Company to support pre-retirement employees in adjusting to life after leaving employment.

The Company also has a Complementary Corporate Pension Plan in place, which provides a lump-sum payment from the Company's funds to employees aged 55 to 65, with at least 20 years of service, upon resignation and relocation outside the Norilsk region. This plan aims to retain employees in the region for a set period and to reward long-serving employees with notable contributions to the Company as they approach retirement.

Pension plan trend

Indicators	2020	2021	2022	2023	2024
Co-Funded Pension Plan					
Number of participants	11,519	10,776	10,406	10,380	9,954
Expenses (RUB mln)	520	542	682	755	843
Complementary Corporate Pension Plan					
Number of participants	511	455	421	445	494
Expenses (RUB mln)	411	411	442	482	543

The Lifetime Monthly Corporate Pension Plan is also available to Company employees awarded

the Badge of Honour, with 237 Group employees granted eligibility

since the programme's launch and 193 of them receiving payments as at the end of 2024.

Housing programmes

Since the launch of its housing programmes, the Company has provided **6,358** APARTMENTS

1.9 THOUSAND EMPLOYEES Benefitted from preferential mortgage loans

1.1 BILLION RUB was spent on housing programmes in 2024

In 2024, Nornickel continued its housing programmes, Our Home / My Home and Your Home, which enabled Company employees with rare qualifications and highly skilled specialists to purchase ready-to-move-in apartments on preferential terms across Russia.

Nornickel purchases housing at its own expense and transfers it to employees under co-financing agreements

The Company covers up to 50% of the apartment cost, but not more than RUB 3 million

The rest of the apartment cost is paid by the employee over a defined period ranging from 5 to 10 years



Nornickel purchases housing at its own expense and transfers it to employees under co-financing agreements: the employer covers up to 50% of the cost, but not more than RUB 3 million (USD 32 thousand), while the employee pays the remaining amount over a specified period of employment with the Company (from 5 to 10 years). The cost of housing remains unchanged throughout the employee's participation in the programmes.

The Our Home / My Home programme entitles an employee to use the housing from the moment they receive it, but the property title is transferred to them only upon completion of their participation in the programme. Under the Your Home programme, the property title is registered in the employee's name immediately, but with a mortgage encumbrance; the encumbrance is lifted once the employee fully repays the debt to the seller.

Between 2014 and 2024, apartments for employees were purchased in the Moscow and Tver Regions, the Krasnodar Territory, and Yaroslavl. To support the creation of additional infrastructure, ensure a comfortable living environment, and facilitate maintenance by the property management company, Nornickel purchased closely located residential properties for its employees. A total of 6,358 apartments have been provided to employees.

In addition, the Company offers a subsidised loan programme under which employees receive interest-free loans to cover initial mortgage instalments and are also reimbursed for part of the mortgage interest paid to the bank. About 1.9 thousand employees have already benefitted from these preferential loans.

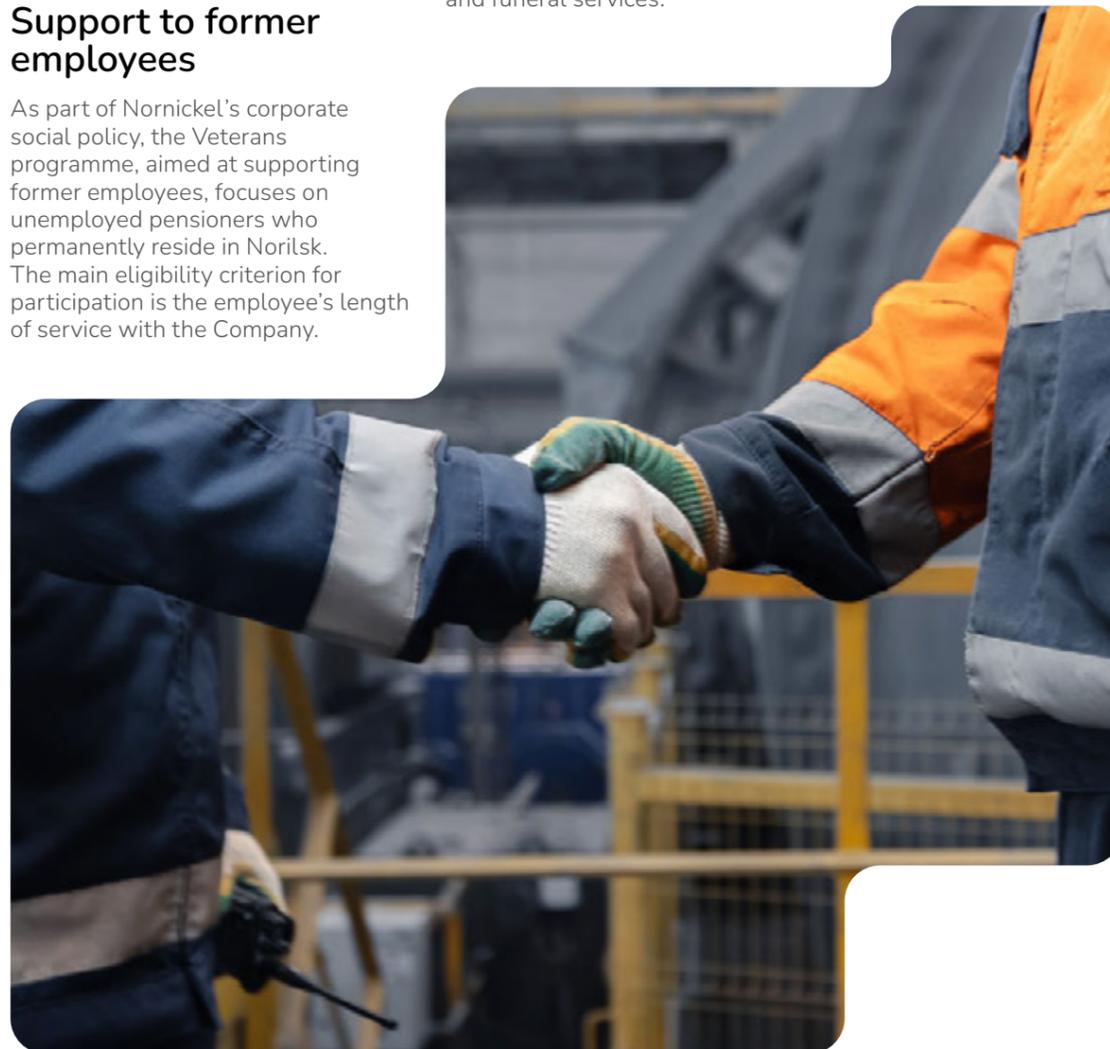
In 2024, the DFAs in Construction project was piloted. The project was launched for employees of the Norilsk site to assist them in purchasing housing using digital financial assets (DFAs). Project participants were given the opportunity to purchase a block of DFAs priced in line with the discounted cost per square metre at the housing construction stage. Upon redemption of these DFAs, the funds received can be used by employees as an initial instalment for buying residential property.

Support to former employees

As part of Nornickel's corporate social policy, the Veterans programme, aimed at supporting former employees, focuses on unemployed pensioners who permanently reside in Norilsk. The main eligibility criterion for participation is the employee's length of service with the Company.

The Pensioner Financial Aid Fund supports former employees who left the Company before 10 July 2001, had a minimum of 25 years of service, and permanently reside outside the Norilsk Industrial District. The fund is financed through voluntary monthly contributions from employees and charitable donations from the Company.

The Company also provides targeted support to former employees and their families facing difficult life circumstances, covering costs related to health improvement, medication, and funeral services.



Industrial safety

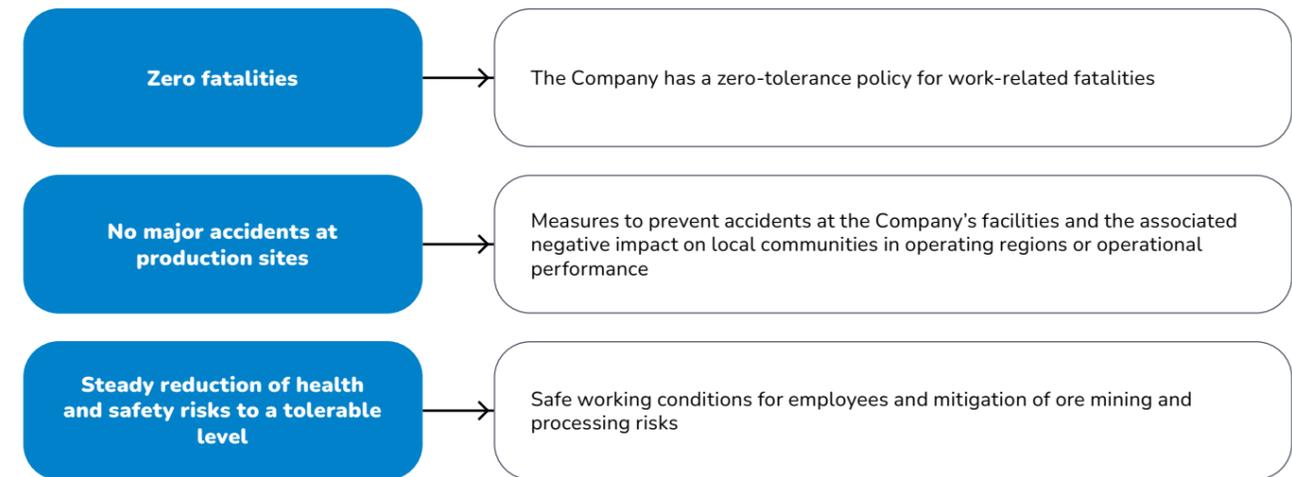
Contribution to the UN SDGs



Key strategic objectives in health and safety for 2023–2025:

- Achieve the industry average injury rate
- Achieve zero fatalities

Strategic goals



In the past year, the Company was strongly focused on enhancements to mine safety systems with the launch of the Critical Risk Management project.

A three-tiered safety barrier system was introduced to minimise the risks of severe and fatal accidents. The system is currently in the pilot deployment phase across all Company mines. Moving forward, the

safety barriers will be integrated into the production control system, and enhancing its effectiveness remains a key strategic challenge for the Company in 2025.

In 2024, a comprehensive employee survey was conducted to evaluate perceptions of health and safety. Based on the results, several initiatives were developed and implemented – the most effective,

such as Detecting Unsafe Activities and the On-Site Training Programme for H&S Staff, are planned for further development and scaling in 2025.

Additionally, the Company launched the Life and Safety – Work Environment project, establishing a unified H&S communications system via a dedicated Telegram channel.

Management system and KPIs

Key performance indicators

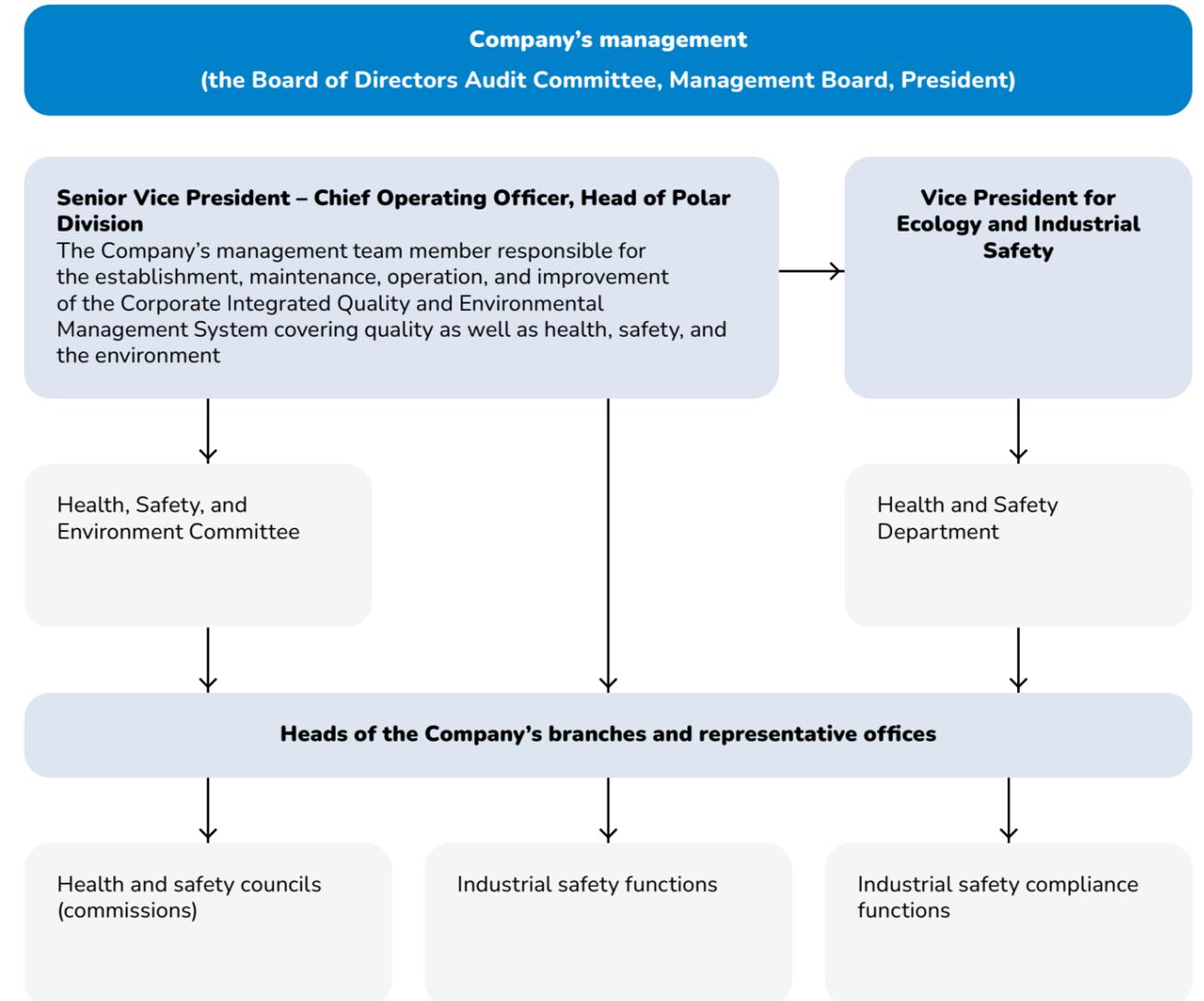


Within the Group's team KPIs, 30% of the weighting is assigned to the implementation of the action plan designed to enhance safety culture and reduce work-related fatalities. These initiatives are directly overseen by senior management, including members of the Management Board. When evaluating performance against this KPI, an adjustment factor based on the current FIFR¹ rate is applied. The FIFR reduction target is based on achieving an annual decrease from a 2021 baseline, with a goal of at least a 50% reduction by end-2024.

Production site managers are personally responsible for the health and safety of each of their subordinates. Injury and industrial safety metrics weigh up to 40% in their individual KPIs. The target is to achieve 100% implementation of the H&S action plan within the established timeframe.



Governance structure



Industrial safety matters are overseen by the Audit Committee of the Board of Directors. The Committee reviews quarterly management reports on industrial safety performance and is briefed on the causes of accidents, the measures taken to prevent

similar incidents in the future, and any disciplinary actions taken against those responsible.

The Company also has a Health, Safety, and Environment Committee, chaired by the Senior Vice President – Chief Operating Officer.

Its main objectives are to improve performance and accountability in health and safety. The Committee holds quarterly meetings at the Group's production sites.

¹ Fatal injury frequency rate, the number of fatalities per million hours worked.

Industrial safety audits

The Company conducts regular audits of its occupational safety management system. In 2024, Nornickel successfully completed the audit and renewed its certificate of conformity. The certification body, Bureau Veritas Certification, described the Company's management system as mature and well-established and confirmed that the corporate systems of Nornickel's audited enterprises met the relevant requirements of the applicable standard. The Company's strengths cited by the auditor include the ongoing safety culture development project; the use of IT solutions and risk-based approach tools; contractor

management practices; and a strong focus on continuous improvement of the health and safety management system.

At the end of 2024, 53%¹ of Group companies were certified to ISO 45001:2018 for occupational health and safety.

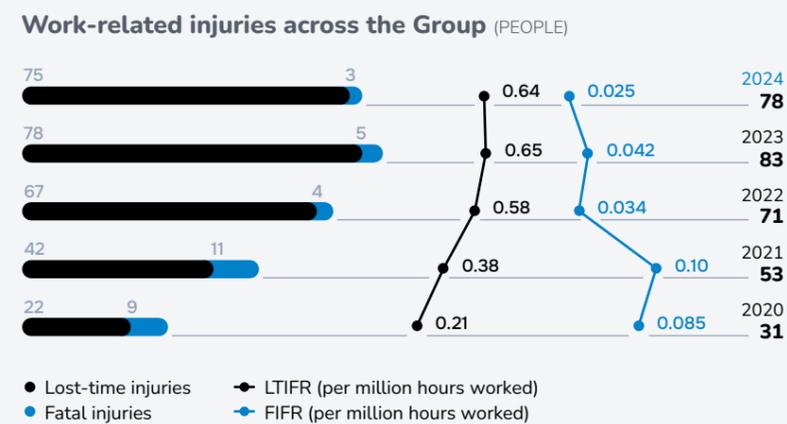
In 2024, new auditing techniques were developed and refined, including:

- maintenance audits, which assess an enterprise's readiness to carry out maintenance activities and the effectiveness of supervising safe work practices

- comprehensive health and safety audits, aimed at identifying systemic gaps, uncovering root causes, and proposing corrective actions
- targeted audits at mine sites (focusing on mining operations), incorporating the three-tiered safety barrier model – technical, procedural, and behavioural.

Work-related injuries

In 2024, the Company continued implementing its Building Risk-Based Thinking Skills project, aimed at revising the health and safety incident reporting process to enhance transparency and improve the accuracy of incident classification. As a result, the Company achieved faster response times and expanded its capacity for further in-depth analysis of workplace incidents. The process for incident investigation and root cause analysis was also significantly revised, opening up additional opportunities for proactive incident prevention in the future.



Causes of fatalities

Indicators	2020	2021	2022	2023	2024
Falls from height	0	1	1	0	0
Falling objects	2	0	0	0	0
Moving objects/parts	1	3	0	0	0
Rock fall	2	2	2	0	0
Underground transport	0	0	0	3	3
Electrocution	3	1	0	0	0
Collapse of structures	0	0	0	2	0
Explosion	0	0	0	0	0
Other	1	4	1	0	0
Total	9	11	4	5	3

The lost time injury frequency rate (LTIFR) decreased to 0.64 in 2024, while the fatal injury frequency rate (FIFR) reached a historic low of 0.025.

Tragically, three fatal workplace accidents were recorded at the Company in 2024. Each accident was thoroughly investigated, with reports submitted to the Board of Directors and action plans developed to address the root

causes. The Company continues to improve the quality of its incident investigations and is reshaping its occupational safety communications with employees.

Following the investigation into an incident where an employee was pinned by a load-haul-dump (LHD) machine, the Company decided to equip all LHDs with the Interlock system, which automatically activates

the parking brake after three seconds of inactivity on both the accelerator and brake pedals. Additionally, video recording devices were installed in LHD cabs to enable monitoring of operator behaviour. A list of critical faults that prohibit machinery from being operated has been established, along with a procedure for equipment acceptance following repairs.

To address the root causes of another incident in which an employee was pinned between a pipeline and a mine wall, the Company enhanced the functionality of the positioning system to enable monitoring of self-propelled diesel equipment while stationary during shift breaks. The standard pipeline fixation design was also updated, providing detailed guidance on approved securing methods. All designated vehicle access points for passenger boarding and exiting were brought into compliance with established standard requirements.

Following the investigation into the incident involving a dump truck striking a pipeline, the mine's production control processes were overhauled across all levels of management. The requirements for planning the installation and dismantling of process pipelines, as well as the inspection and acceptance of completed work, were revised.



¹ By average headcount.

Contractor safety

Contractor injury rates (people)

Indicators	2020	2021	2022	2023	2024
Work-related injuries, including:	18	30	46	32	31
Lost-time injuries	15	28	42	25	30
Fatal injuries	3	2	4	7	1
LTIFR	-	-	-	-	0.52
FIFR	-	-	-	-	0.017

The Company's procedural documents on industrial safety – including regulations, policies, corporate standards, and the Golden Rules of Safety – also apply to contractor employees.

When engaging contractors, the primary focus in health and safety is on preventing fatal incidents and ensuring compliance with industrial safety requirements.

In 2024, the Company launched a system for collecting injury statistics, including the calculation of contractor-specific LTIFR and FIFR.

All tasks performed by contractors in high-hazard environments are carried out in accordance with corporate

safety standards. Work permits must include occupational safety requirements to be followed during both the planning and execution of tasks. Compliance with these requirements is monitored on every shift. Prior to the commencement of any work, contractor employees are required to receive induction and targeted briefings on occupational health, including safety measures.

Contractor representatives participate in both regular joint safety inspections and H&S committee meetings held at Nornickel sites. If contractors fail to comply with safety requirements, penalties are imposed.

To foster a culture where safety is a shared value among all stakeholders, Nornickel holds an annual forum with major contractors to discuss relevant case studies and safety challenges. These discussions are supported by training sessions delivered by the Company's internal safety coaches. The forum reinforced the understanding that safety is a collective responsibility, not solely that of the customer.

In addition, Nornickel regularly organises contractor training sessions on Dynamic Risk Assessment and Behavioural Safety Audits.

To maintain a high level of employee awareness regarding safety measures, the Company regularly develops and updates its guides, videos, presentations, and other visuals highlighting key safety measures for protecting life and health in various situations or when performing specific tasks. All Company employees have access to occupational health information.

For example, in 2024, Nornickel focused on the following key initiatives:

- Changing the communication format – with an emphasis on clear, engaging examples related to health and safety
- Implementing proprietary digital solutions to prevent accidents
- Introducing a new audit format aimed at identifying systemic gaps
- Sharing and replicating lessons learned from incident investigations

The Company has a formal procedure in place that allows employees to refuse work if they are exposed to risk. Such refusal does not result in any disciplinary action against the employee. Each employee has the option to anonymously contact the Corporate Trust Line in case of complaints or suggestions. Additionally, employees are encouraged to ask questions and receive feedback from managers at all levels during working meetings, huddles, and similar events.

Emergency preparedness

In line with legal requirements, Nornickel maintains a constant state of emergency preparedness across all units, including for emergency

containment and response. This is particularly critical, as the Company operates more than 300 hazardous

facilities that use hazardous substances in their production processes.

Emergency preparedness procedures

Every enterprise has in place on-site emergency response plans

Employees undergo training on emergency response actions, and drills are conducted

Contracts with professional emergency rescue services and organisations are maintained

Reserves are in place to support emergency response at hazardous facilities

Mine rescue teams have been established and take regular training under conditions as close to real emergencies as possible

Emergency surveillance, alert, communication, and response support systems have been installed across facilities

Safety culture

The Company continuously improves its H&S system elements. These changes cover all production units of the Company – from mining ore to making metals.

Health and safety expenses

Indicators	2020	2021	2022	2023	2024
Health and safety expenses (RUB mln), including:	9,724	12,728	21,697	17,505	19,784
Expenses per employee (RUB thousand)	136	173	272	218	256

Monitoring of violations

Nornickel has developed and operates a multitiered H&S monitoring system, which includes ad hoc, targeted, and comprehensive H&S inspections. The Company's incident reporting procedure and incident classification system enable prompt response to incidents and enhance the quality of subsequent analysis.

In 2024, the Company implemented a new tool that enables centralised incident logging in a unified database, efficient tracking of investigation progress and statuses, secure storage of investigation results, and more effective information sharing across units.

In addition, the Company conducts behavioural safety audits. As a result of prevention and control efforts, more than 8 thousand industrial safety violations were identified, with the responsible employees held accountable, including through partial or full withholding of bonuses.

Employee training

The Company is committed to ensuring that its employees have the necessary knowledge, skills, and competencies to perform their duties safely and responsibly.

Training begins immediately after hiring, starting with a health and safety induction, followed by on-the-job briefings. Thereafter, briefings and training sessions are held regularly in line with corporate programmes and the specific nature of each role. All Group employees regularly take online industrial safety trainings followed by tests. Interactive training courses have also been developed for employees in core operational roles.

H&S training statistics

Indicators	2020	2021	2022	2023 ¹	2024
Number of employees trained	34,040	38,253	51,520	57,114	55,427
Percentage of employees trained	47	52	66	72	70
Number of trainings conducted	–	–	707	4,262	4,045

A project to establish a train-the-trainer programme for safety culture was launched in September 2022. Its training programmes are updated annually. In 2024, a total of 4,045 training sessions were conducted, with more than

55 thousand employees trained under the project. In addition, the trainers delivered training to over 1 thousand contractor employees and 510 students as part of the initiative.

Protection against health hazards

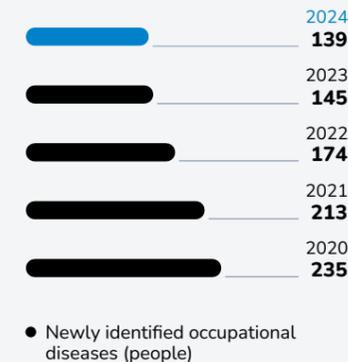
The Company protects employees from workplace health hazards by providing collective and personal protective equipment, introducing effective work and rest schedules, and improving workplace amenities. All employees have a mandatory meal break during their shifts.

Employees exposed to hazardous substances undergo special medical examinations at occupational pathology centres. Personnel working in contaminated environments are provided free of charge with wash-off and decontaminating agents. Employees

operating in hazardous or highly hazardous conditions are entitled to free preventive nutrition, milk, or equivalent food products.

Prevention of occupational diseases

Occupational disease statistics (PEOPLE)



Most Company employees reside in the Norilsk Industrial District. To minimise the risk of occupational diseases, Nornickel operates the Sulphur Project aimed at reducing sulphur dioxide emissions, implements effective healthcare

measures that consider both workplace and personal risk factors, and encourages healthy lifestyles.

Regular health monitoring of employees is a key element in preventing occupational diseases. All employees undergo mandatory

pre-employment and regular medical examinations at the Company's expense throughout the course of their employment. On-site medical aid posts operate at production facilities to conduct pre-shift health checks and provide medical assistance upon request.

¹ Since 2023, the number of employees trained has been tracked based on programmes developed by the H&S Department.



Environment and climate

Contribution to the UN SDGs



Reducing environmental impact remains one of Nornickel's strategic priorities. The Company strictly complies with environmental legislation, identifies and manages environmental risks, regularly trains employees, improves environmental controls, streamlines production processes, and takes biodiversity conservation and restoration measures.

Strategy

In 2024, the Company updated its [Environmental and Climate Change Strategy](#), extending its planning horizon to 2035 and introducing new initiatives, including the construction and modernisation of wastewater treatment facilities, biodiversity restoration efforts, replacement of legacy dust collection equipment, and the commissioning of mobile waste treatment units. The updated strategy also reaffirms Nornickel's

commitment to reducing greenhouse gas emissions across its footprint and contributing to national climate goals.

In addition, the document adjusts targets for disturbed land rehabilitation and sulphur dioxide emission reduction. While the target for sulphur dioxide capture was 377 kt in 2024, it is set to double to 736 kt in 2025 and increase to 922 kt from 2026 onwards.



In total, the strategy comprises
323
INITIATIVES

Focus areas	2031 targets
No interregional or national emergencies	
Air	Reduction of SO ₂ emissions by 90% ¹ to 213 ktpa
Water	100% compliance with regulatory requirements for pollutant concentrations in wastewater
	100% compliance with freshwater withdrawal limits ²
Tailings storage facilities and waste	100% compliance with regulatory requirements for waste disposal facilities
Land	Rehabilitation of 3,996 ha of disturbed land ³
Biodiversity	Achievement of net zero biodiversity losses as a result of the Company's operations (Δ Integrated Ecosystem Health Indicator (IEHI))

¹ Vs the 2015 base year.

² In accordance with the water use contract; includes initiatives to install metering devices.

³ From the 2022 base year.

Environmental management

In place since 2005, the Company's environmental management system is part of the integrated quality and environmental management system. This ensures coordination between all environmental matters and other areas, enhancing the Company's overall performance on environmental safety.

Environmental audits

The Company confirms the compliance of its environmental management system with ISO 14001:2015 by engaging Bureau Veritas Certification Rus (BVC) to conduct surveillance audits annually and recertification audits every three years. Bureau Veritas Certification Rus operates in Russia under the accreditation of the Egyptian EGAC, which is a full signatory and participant of the IAF MLA¹.

In 2023, based on the results of a recertification audit, the Company received a certificate of conformity valid until 12 January 2027. The first surveillance audit of the seventh certification period conducted in 2024 established full conformity with ISO 14001, and the certificate was extended for another year.

At the end of 2024, 51% of Group assets² were certified to the ISO 14001 environmental standard.

ISO 14001:2015 certificate

Certified assets	Status
Head Office and branches	<ul style="list-style-type: none"> Certification body: Bureau Veritas Certification Rus In 2024, a surveillance audit was conducted
Kola site	
Foreign site	<ul style="list-style-type: none"> Certification body: Bureau Veritas Certification Rus The foreign site maintains certification for conformity with ISO 14001:2015
Trans-Baikal Division	<ul style="list-style-type: none"> Certification body: IRCLASS IRQS (India) The asset's environmental management system was certified in 2023 In 2024, a surveillance audit was conducted

¹ Multilateral Recognition Arrangement of the International Accreditation Forum.

² By average headcount.

Air

One of the Company's principal environmental impacts is the significant emissions of sulphur dioxide during the smelting of sulphide concentrates.

Sulphur Project

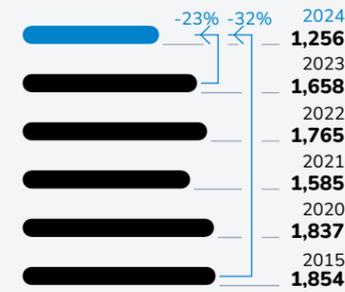
Nornickel's development strategy is to transform the Company into an environmentally safe business, including by implementing the Sulphur Project at the Kola and Norilsk production sites. The Sulphur Project is a large-scale initiative to recover sulphur dioxide from off-gases of flash smelting furnaces.

At the Norilsk site, it is implemented at Nadezhda Metallurgical Plant and includes technological upgrades to recover sulphur dioxide from off-gases of flash smelting furnaces by converting them into sulphuric acid and then neutralising it with limestone. The resulting gypsum pulp from the neutralisation process is stored in a dedicated gypsum storage facility.



In 2024, the Group's pollutant emissions totalled **1.3 MLN T** — down 24% y-o-y.

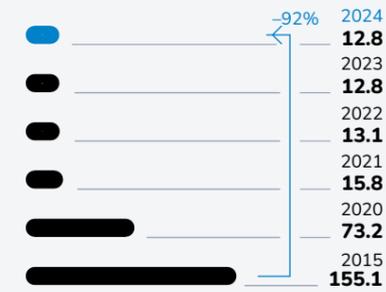
Sulphur dioxide emissions at the Norilsk site (KT)



In October 2023, the first process line was launched, with 7.5 kt of sulphur dioxide recovered during pre-commissioning before the end of the year. In September 2024, the Company launched comprehensive testing of the second process line, boosting sulphur dioxide recovery from gases to approximately 390 kt. Preliminary assessments of the technologies applied in the project demonstrated a recovery efficiency exceeding 99%, a figure confirmed by government agencies during control and oversight inspections.

At the Kola site, the Sulphur Project helped reduce sulphur dioxide emissions by over 90% compared to the 2015 base year – exceeding the target of 85%. From 2020 to 2024, emissions remained virtually unchanged thanks to production reconfiguration measures and the adoption of the best available technologies.

Sulphur dioxide emissions at the Kola site (KT)



Air pollutant emissions across the Group (KT)

Indicators	2020	2021	2022	2023	2024
Sulphur dioxide (SO ₂)	1,911	1,601	1,778	1,671	1,269
Nitrogen oxide (NO _x)	10	11	10	6	6
Particulate matter	15	9	11	11	11
Other pollutants	33	25	21	20	21
Total	1,968	1,647	1,819	1,708	1,307



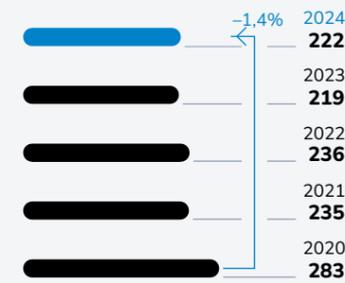
Water

In 2024, RAEX ranked Nornickel among the leaders in water stewardship.



Total freshwater withdrawn (MCM)

FOR PRODUCTION ACTIVITIES WITH THE EXCEPTION OF MINE WATERS.



Company enterprises are located in regions with sufficient water resources. In 2024, no water stress was reported, as both enterprises and local populations were supplied with adequate water volumes.

Nornickel's operations are associated with the following water-related risks:

- Pollution of water bodies resulting from tailings or petroleum product spills
- Pollution of water bodies due to poor performance of wastewater treatment facilities
- Depletion of water bodies caused by withdrawals exceeding permitted limits

The Company is committed to the responsible and sustainable use of water resources and the prevention of water body pollution. To this end, the Company regularly monitors groundwater at production sites and is designing systems to collect and treat mine-impacted water. All facilities using water monitor water bodies and water protection areas. Nornickel does not withdraw water from protected natural sites and strictly complies with water withdrawal limits.

Nornickel's key production facilities operate closed-loop water systems. Water is mostly withdrawn from surface and underground sources,

but also includes third-party wastewater and natural inflow. In 2024, water withdrawal increased by 3.6 Mcm y-o-y, including a 3.5 Mcm rise in freshwater withdrawal. Natural water inflow accounted for 14.8% of total water withdrawal in 2024.

An impressive 81% of all water used by the Company was recycled and reused, including produced and mine water used to neutralise sulphuric acid under the Sulphur Project.

Water consumption and wastewater discharge in 2024

Water withdrawal

321 MCM

- **218 Mcm** Surface sources
- **26 Mcm** Underground sources
- **17 Mcm** Wastewater
- **50 Mcm** Natural water inflow
- **10 Mcm** Other

Consumption

1,224 MCM

= 232 (freshwater) + 992 (reused and recycled water)

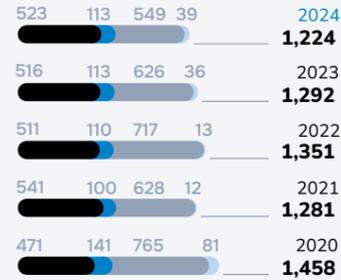
- **72 Mcm** reused water (6%)
- **920 Mcm** recycled water (75%)

Wastewater discharge

224 MCM

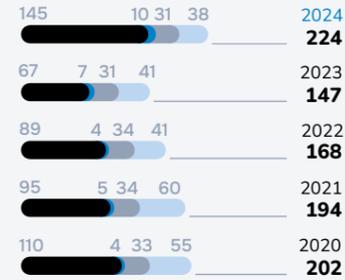
- **145 Mcm** Clean
- **10 Mcm** Treated
- **31 Mcm** Insufficiently treated
- **38 MCM** Contaminated

Water consumption by site (MCM)



- Norilsk site
- Kola site
- Energy Division
- Other

Wastewater discharge to water bodies (MCM)



- Clean
- Treated
- Insufficiently treated
- Contaminated

Wastewater discharge to water bodies primarily stays within permitted limits and has no material impact on biodiversity. In 2024, wastewater discharge increased by 52% due to the discharge of standard-quality treated water used for cooling at CHPP-1.

Nornickel takes all possible measures to ensure that pollutant concentrations in wastewater comply with regulatory requirements. All domestic sewage discharges are routed through biological or physico-chemical treatment facilities. The volume of untreated wastewater decreased by 3.4 Mcm in 2024. The mass of pollutant discharges decreased by 43% to 89.9 kt.

Nornickel consistently invests in improving the efficiency of existing water treatment systems and building new ones, and it regularly assesses its impact on water resources. The relevant measures include:

- wastewater inventory
- assessment of wastewater quality at accredited laboratories at legally mandated intervals
- monitoring of wastewater discharge volumes and quality at discharge sites
- observation of surface water bodies at control points upstream and downstream of discharge sites
- monitoring of wastewater treatment processes at treatment facilities and implementation of organisational and technical measures to improve treatment effectiveness.



Impacts from water transport

The Company takes steps to reduce fuel consumption by its water transport and to prevent contamination of the Dudinka and Yenisei Rivers. It also supports biodiversity by organising the release of fish fry into natural habitats.

Waste

Of the waste generated in the Company's own activities, 99% is classified as non-hazardous. This includes rock and overburden, tailings, metallurgical slags, and ferrous cake. Ore extraction waste

is placed in waste rock dumps and used for backfilling mined-out underground stopes and open pits, as road fill, or for reinforcing tailings dams. Of the total waste generated,

gangue accounts for 80%, tailings for 18%, and recycled or reused waste makes up 17%.

Key methods for reintegrating waste into own production include recycling in smelting furnaces, oil recovery, use as flux, incorporation into furnace charge materials, and application in construction.

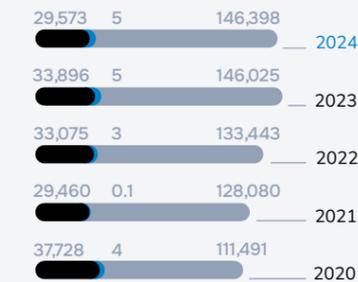
Waste generation remained virtually flat year-on-year in 2024.

Waste generation by hazard class (KT)



- Class IV-V (including overburden and tailings)
- Class I-III

Waste management (KT)



- Recovery and treatment
- Disposal

Waste disposal

The Company currently operates six tailings storage facilities: four at the Norilsk site, one at the Kola site, and one in the Trans-Baikal Division.

All of them are situated at a considerable distance from production sites and human settlements.

Nornickel recognises that tailings storage facilities are high-risk assets with the potential for significant environmental impacts and consequences for the quality of life of local communities. The Company has developed a [Tailings Management Policy](#) and conducts

regular monitoring of the condition of tailings dams, discharge sites, and adjacent areas.

As part of the Sulphur Project, a gypsum storage facility was also constructed and is currently in the pre-commissioning stage. The facility is designed for the safe storage of gypsum pulp.

Land and biodiversity

Land

The Company's priority in land conservation is to reduce and, where possible, prevent negative impacts associated with its operations.

Land disturbed and reclamation (HA)

Indicators	2022	2023	2024
Land disturbed at the beginning of the reporting period	16,694	16,906	17,225
Land disturbed during the reporting period	317	297	199
Reclamation	75	15	71
Land disturbed at the end of the reporting period	16,936	17,188	17,353

Land rehabilitated (HA)

Indicators	2022	2023	2024
Land rehabilitated, including:	498	245	235
• Revegetation	12	5	9
• Clean-up	154	79	73
• Reforestation	284	112	87
• Reclamation (from strategy)	48	49	66

Nornickel regularly participates in landscaping and greening initiatives in the regions where it operates. The Company has developed an action plan for the rehabilitation of disturbed areas, which includes clean-up and improvement of municipal areas adjacent to motorways, protection of water bodies and water protection areas, and the enhancement of local holiday camps. These initiatives are implemented in cooperation with local authorities and employee volunteers from Nornickel.

Biodiversity conservation

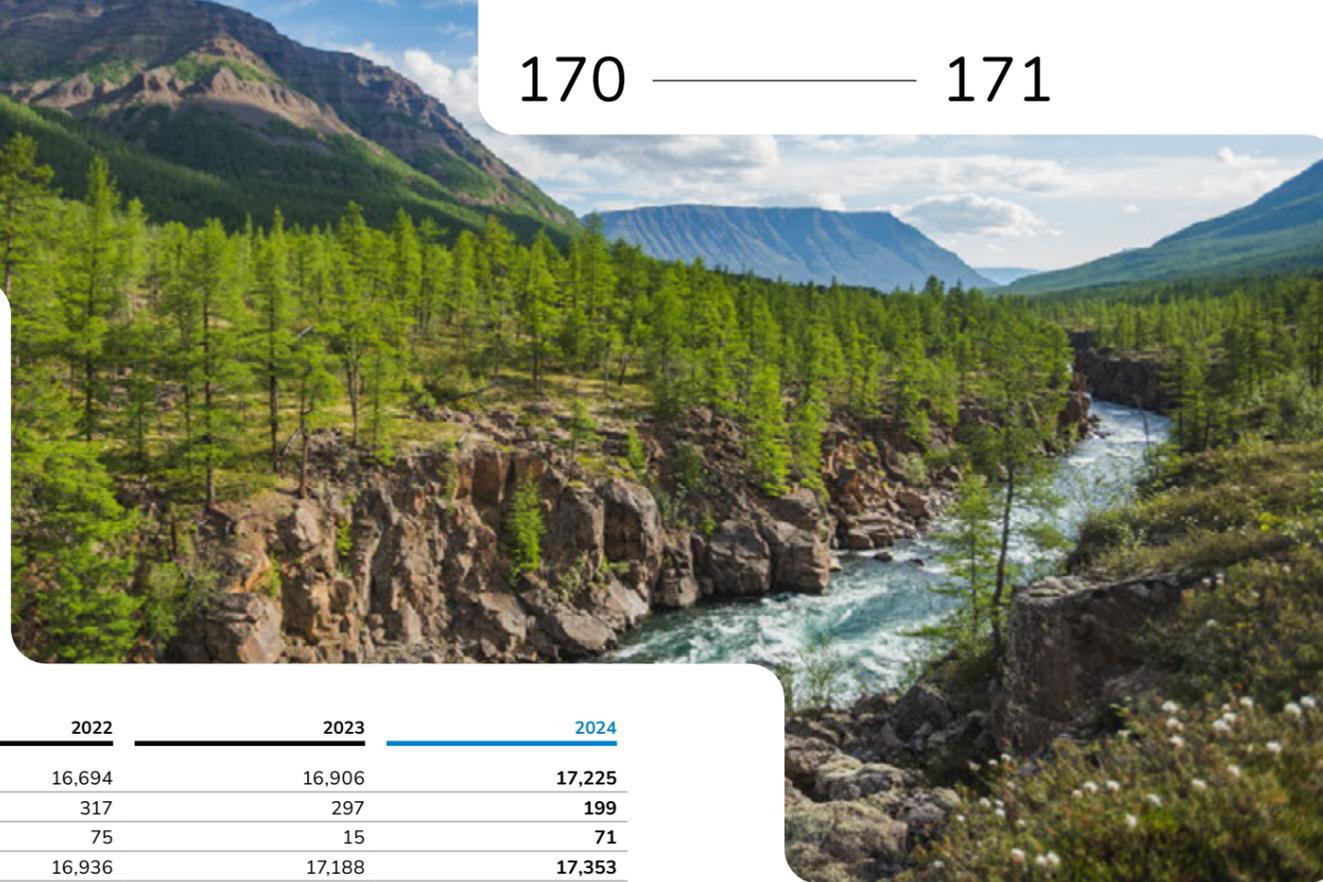
For many years, Nornickel has actively supported biodiversity conservation and worked to preserve species in the regions where it operates.

Since 2022, the Company has been working in collaboration with scientists from the Russian Academy of Sciences (RAS) to assess biodiversity and organise

expeditions for comprehensive studies of ecosystems in areas where its mining, production, and energy operations are located. These are the largest ecosystem research projects since the Soviet era. To date, three regions have been studied: the Trans-Baikal Territory, the Murmansk Region, and the Taimyr Peninsula.



For more details on the research findings and biodiversity conservation measures, please visit the dedicated website, life.nornickel.com and Biodiversity section of the Company website.



Salmon foundation for preserving the biodiversity of the Kola Peninsula cleaned the river and carried out a series of scientific studies.

In the Trans-Baikal Division, nearly 150 thousand common carp fry were released into Lake Shaksha in the Ivano-Arakhleisky Nature Park during 2024 to help restore the species' declining population. For

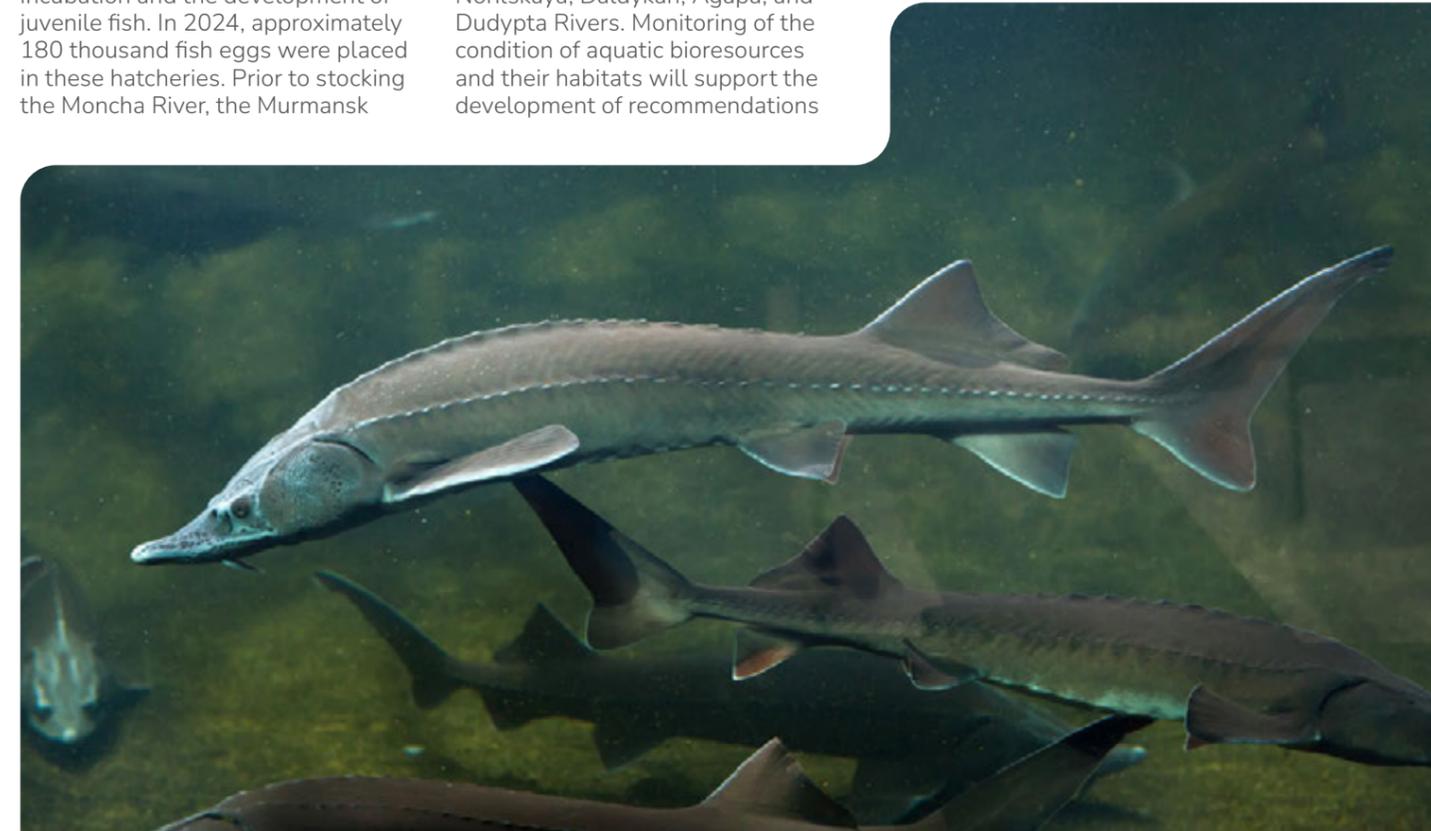
many years, the Company has also operated a programme for the incubation and release of valuable fish species into water bodies in the Krasnoyarsk Territory to replenish their populations. Valuable fish species, including those listed in the Red Data Book, are bred at facilities operated by specialised contractors, with juvenile fish later released into natural water bodies.

Since 2023, the Company has been involved in efforts to preserve the gyrfalcon population under an agreement with the Russian Ministry of Natural Resources and Environment.

Since 2022, the Kola site, in collaboration with the Institute of Biology of the Kola Science Centre of the Russian Academy of Sciences, has been involved in fish stocking of local water bodies. Dozens of hatchery nests have been installed in the Monchegorsk area to support egg incubation and the development of juvenile fish. In 2024, approximately 180 thousand fish eggs were placed in these hatcheries. Prior to stocking the Moncha River, the Murmansk

Since 2023, under an agreement between the Company, the Federal Agency for Fishery, and the Russian Federal Research Institute of Fisheries and Oceanography, a team of scientists has been conducting research on Lake Pyasino, the Pyasina River, and the Ambarnaya, Norilskaya, Dal'dykan, Agapa, and Dudypta Rivers. Monitoring of the condition of aquatic bioresources and their habitats will support the development of recommendations

for fish population recovery. During the 2024 expedition, 16 Siberian sturgeon were caught in the Pyasina River – the first recorded catch since 1982. The species had previously been considered extinct on the Taimyr Peninsula.



Cooperation with nature reserves

Nornickel supports nature reserves in the regions where it operates and does not conduct operations within or near protected areas:

- In the Murmansk Region, the Pasvik, Lapland, and Kandalaksha Nature Reserves are located 10 to 90 km away from the Kola site's production facilities
- In the Krasnoyarsk Territory, the buffer zone of the Putoransky Nature Reserve lies 80 to 100 km from Nornickel's production sites
- In the Trans-Baikal Territory, the Daursky State Nature Biosphere Reserve is located 250 km from the Trans-Baikal Division's production facilities

Nornickel environmentalists, experts from the Siberian Branch of the Russian Academy of Sciences, and representatives of the nature reserves wrapped up the Big Scientific Expedition, which helped to:

- update the delineation of the impact areas of the Company's facilities and assess biodiversity both in areas adjacent to production sites (within the impact areas) and in locations beyond the radius of negative impact, where plant and animal communities typical of the region are found

- identify the key factors and extent of negative impact of the Company's facilities on local ecosystems
- record the diversity of plant, vertebrate, and invertebrate species and calculate an integrated ecosystem health indicator to evaluate biodiversity net gain
- identify indicator species reflecting the condition of local ecosystems.

In 2024, the Company continued to cooperate with nature reserves on the Taimyr Peninsula.

As part of this cooperation, the endemic Putorana snow sheep – listed in Russia's Red Data Book – was studied, and a conservation strategy for the species was developed.

In the Murmansk Region, the Company works with the Pasvik and the Lapland Nature Reserves.

To raise awareness about the preservation of the reindeer population in the Lapland Nature Reserve, Nornickel participates in the Let's Save Reindeer Together project. With the Company's support, eco-trails were created in the reserve, guest houses and a visitor centre were built, and two books were published – one about the founders of the reserve, and a children's book titled Secrets of the Lapland Nature Reserve.

In the Pechengsky District, the Company supports a unique initiative by the Pasvik Nature Reserve to establish a Freshwater Pearl Mussel Reintroduction Centre.

Plans for population restoration extend beyond the district to other municipalities in the region. At the time of writing this Report, a project roadmap was under development and suitable habitats were being studied in the Paz, Kaskamajoki, Laukkujoki, and Nilijoki river basins.

The Company also plans to propose broader biodiversity cooperation with the reserve, drawing on the experience it has gained through long-standing partnerships with other reserves in the region. Plans include the joint implementation of volunteer environmental research projects.

In 2024, the Company supported a rescue operation for an injured humpback whale, a Red Data Book species, in the Barents Sea. The whale was entangled in remnants of fishing nets and could not fully open its mouth, a condition that would have led to certain death. Thanks to the joint efforts of the Company, Rosprirodnadzor, and the Murmansk Region emergency response team, the animal was successfully saved.

In the Trans-Baikal Territory, the Company contributed to the uninterrupted work of inspection teams tasked with protecting mass gatherings and breeding areas of rare species, and supported the systematic winter census of the Mongolian gazelle (a hoofed mammal of the Procapra genus, Bovidae family) in the Daursky Biosphere Reserve. In addition, an eco-trail was created at the planned Krasnaya Gorka natural monument, a protected area of regional significance.



Climate

Our approach

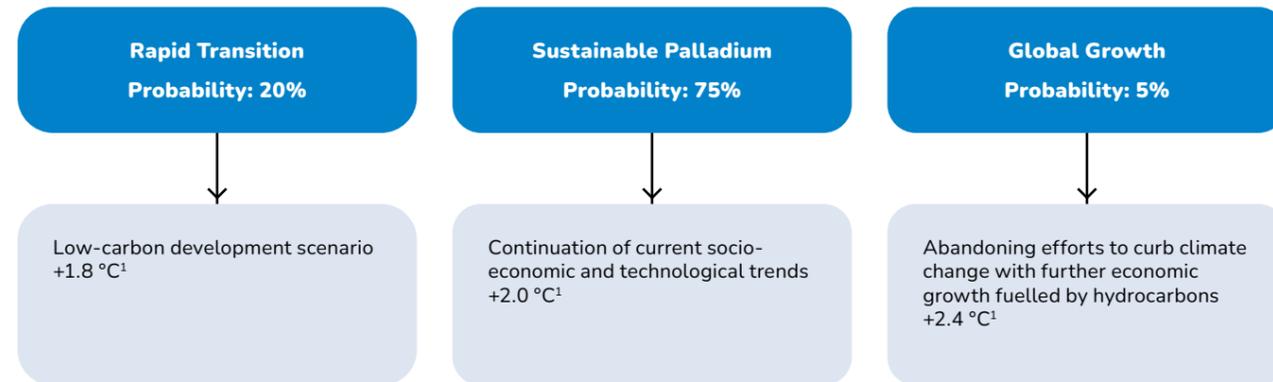
Nornickel strives to reduce greenhouse gas emissions in its regions of operation and contributes toward Russia's national climate goals. The key measures to achieve carbon neutrality include production upgrades, gangue mineralisation in tailings

storage facilities, energy efficiency efforts, steps to increase the share of renewables and low-carbon-footprint fuels in the energy and transport sectors, and climate projects.

The Company continues integrating its climate risk and risk factor management system into its

business processes in accordance with the TCFD and COSO recommendations.

To assess risks and opportunities arising from the global energy transition, Nornickel has developed three own scenarios for global economy and climate change until 2060.



The Company has chosen the Sustainable Palladium as its baseline scenario, according to which traditional industries are expected to remain centre stage along with the growing green economy. In particular, internal combustion engine vehicles are expected to retain a large market share, supporting a steady long-term demand for palladium. The other two scenarios are used by the Company to stress-test climate-related risks.

Greenhouse gases

Since 2020, the Company has been calculating its direct and indirect greenhouse gas emissions (Scope 1 + 2), including the emissions allowance for the Sulphur Project. In view of the upcoming reconfiguration of the Copper Plant, which will substantially cut the pollutant emissions, the Company adjusted its calculations of greenhouse gas emissions by excluding the emissions

allowance of the Sulphur Project for the Copper Plant that was previously accounted for in the Group's gross emissions².

In 2024, direct and indirect greenhouse gas emissions from operations (Scope 1 + 2) amounted to 7.5 mln t of CO₂ equivalent³, and 0.4 mln t of CO₂ equivalent was directly removed through gangue mineralisation in tailings storage facilities.



For more details on climate-related risks and opportunities, please see the [Risk Management](#) section of this Report.

¹ Temperature change by 2050.

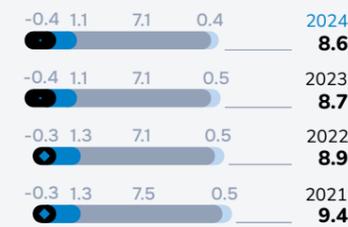
² Data on GHG emissions from the Sulphur Project of Nadezhda Metallurgical Plant will be updated once the project is ramped up to its design capacity.

³ The emissions Scope 2 were calculated using the location-based method. Also GHG emissions (Scope 1+2) were, including the emissions allowance for the Nadezhda Metallurgical Plant under the Sulphur Project and excluding emissions from heat and electricity supplies to household consumers.

In 2024, the Group's greenhouse gas emissions decreased due to the following factors:

- lower per unit fuel consumption for heat and electricity generation as a result of optimising equipment operation modes at combined heat and power (CHP) plants
- lower heat and electricity generation due to a warmer winter in the Norilsk Industrial District
- updating of regional CO₂ emission factors for electricity supply within the energy systems of the Murmansk Region and Trans-Baikal Territory.

GHG emissions, Scope 1 + 2 (MLN T OF CO₂ EQUIVALENT)¹



- Greenhouse gas removal
- Scope 1 emissions from households and infrastructure facilities
- Scope 1 emissions from production assets
- Scope 2 emissions from production assets

Energy indirect GHG emissions (Scope 2) were calculated using the location-based method, including regional emission factors. Regional emission factors were updated to take into account new commissioned renewable facilities in the Company's regions of operation.



The Trans-Baikal Division and RusHydro signed a bilateral agreement to purchase 124.9 mln kWh of electricity generated by RusHydro hydropower plants, driving Scope 2 GHG emissions down by more than 126 kt of CO₂ equivalent in 2024.

The world is seeing a rapidly emerging and growing global carbon market, where industrial companies issue carbon units when implementing climate projects. Nornickel participates in the national carbon market and plans to enter the international one. In 2024, Nornickel and RusHydro entered into the largest carbon unit sale and purchase transaction in the Russian market, and the Company also started issuing its own carbon units, with

the Kola enterprise switching main ventilation units at Severny Mine to electric heating. A total of 17,483 carbon units are planned to be released (with 14,193 carbon units currently outstanding).

As part of its climate action, Nornickel is considering environmental and climate projects in its regions of operation.

To reduce its direct and indirect energy GHG emissions, the Company monitors and manages emissions and upgrades production. The Company plans to commission its own generation facility – a solar power plant in the Trans-Baikal Territory, in the second half of 2025 and is also working on switching its mining transport equipment to alternative fuels.

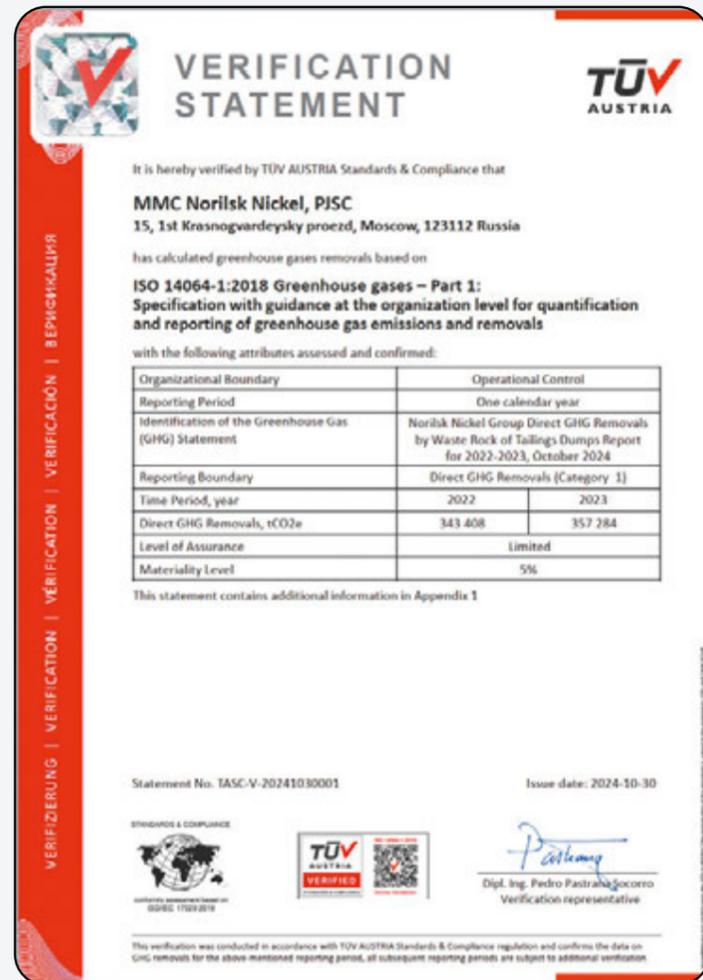
¹ GHG emissions were calculated as per the GHG Protocol Guidelines. Estimates of greenhouse gas emissions for the Group included the following greenhouse gases: direct emissions of carbon dioxide (CO₂), nitrogen oxide (N₂O), and methane (CH₄), mostly from gas transportation, including the Nadezhda Metallurgical Plant under the Sulphur Project, and heat and electricity supplies to household consumers.

As removal of atmospheric carbon dioxide is one of the most important actions to combat the global climate change, another focus area for reducing greenhouse gas emissions is gangue mineralisation in tailings storage facilities. Mineralisation is one of the most effective CO₂ sequestration methods, which involves chemical reactions between carbon dioxide, water, and rocks.

These reactions form stable carbonate minerals such as calcite/aragonite, dolomite, magnesite, and siderite that can store carbon for thousands of years. The method has great potential for long-term CO₂ storage in stable mineral forms, making it attractive for large-scale application. Nor Nickel's tailings storage facilities are unique in that they are equipped to absorb greenhouse gas emissions, including carbon dioxide. The amount of direct GHG absorption depends on the volume of waste rock generated during the reporting period and disposed of at the Group's tailings storage facilities.

The Company has certified the methodology for calculating direct GHG absorption through gangue mineralisation in tailings storage facilities, unique in Russia, to GOST R ISO 14064-1-2021 Greenhouse gases. Part 1. Specification with guidance at the organisation level for quantification and reporting of greenhouse gas emissions and removals. Data on actual absorption for 2021–2024 have been verified by an international independent company.

Nor Nickel plans to develop this project, with detailed studies of artificial and active mineralisation in tailings storage facilities scheduled to start in 2025. These processes have a considerable potential for GHG removal and will further be presented as climate projects.



In 2024, the Gangue Mineralisation – Greenhouse Gas Removal by Tailings Storage Facilities became one of the Best ESG Projects in Russia in the Climate Action. reducing Greenhouse Gas Emissions category.

GHG emissions from production operations, Scope 1 + 2
(MLN T OF CO₂ EQUIVALENT)



Nor Nickel's key production facilities are located in the Norilsk Industrial District, in the Arctic Circle, and operate in sub-zero temperatures for about eight months of the year. The district is isolated from the federal energy infrastructure, so Nor Nickel generates electricity and heat locally at its own generating facilities (100% owned by the Group). As a result, the bulk of GHG emissions comes from the Company's energy assets. As Nor Nickel is the only producer of electricity and heat in the Norilsk Industrial District, the Company also fully meets the demand for energy and heat from social infrastructure facilities and the local population. The share of GHG emissions generated by infrastructure facilities and households in Nor Nickel's regions of operation is on average 12% of total Scope 1 + 2 GHG emissions.

Scope 3

The Company annually quantifies its other indirect (Scope 3) GHG emissions, which originate outside the Group and are beyond the Group's control or influence. The Company distinguishes between upstream and downstream Scope 3 emissions.

The bulk of upstream Scope 3 emissions is related to the purchase of raw materials and equipment from suppliers as well as energy and fuel consumption (to the extent not included in Scope 1 + 2).

Downstream emissions are associated with the transportation of the Company's products from production assets to consumers and

subsequent processing into finished products. In 2024, the Company updated the methodology for calculating downstream emissions to align it with new methodologies¹. The 2024 assessment covered nickel, copper, palladium, platinum, copper and nickel intermediates, and iron ore concentrate sold outside the Group. The bulk of these emissions comes from intermediates sold outside the Group. Emission volumes are influenced by changes in sales volumes, the Group's product and customer portfolio, and the geographic mix of product sales.

Scope 3 emissions are quantified in line with the GHG Protocol guidance for all categories relevant to the Group and the IPCC Guidelines for National Greenhouse Gas Inventories.

GHG emissions, Scope 3 (MLN T OF CO₂ EQUIVALENT)

Emissions by category	2021	2022	2023	2024
Scope 3 (other indirect GHG emissions)	5.4	5.3	6.4	6.7
Upstream, including:	1.4	1.4	1.3	1.2
• purchased goods and services	0.8	0.9	0.8	0.7
• capital investments	0.1	0.1	0.1	0.1
• energy and fuel	0.4	0.3	0.3	0.3
• other	0.1	0.1	0.1	0.1
Downstream, including:	4.0	3.9	5.1	5.5
• processing of sold products	3.8	3.7	4.9	5.3
• transportation of sold products	0.2	0.2	0.2	0.2

¹ The Scope 3 Emissions Accounting and Reporting Guidance (2023) by the International Council on Mining and Metals (ICMM), ISO 14083:2023 Greenhouse gases – Quantification and reporting of greenhouse gas emissions arising from transport chain operations, Global Logistics Emissions Council (GLEC) Framework, Scope 3 GHG Emissions in the Nickel Value Chains. A Guide to Determine Nickel-Specific Scope 3 GHG Emissions by the Nickel Institute, and industry best practices.

Renewables and energy efficiency

Powered by both external and own generation facilities, Nornickel's production assets are sources of direct and indirect greenhouse gas emissions (Scope 1 + 2).

The Kola site and Trans-Baikal Division source heat from their own boiler plants and purchase electricity in the wholesale electricity and capacity market (WECEM).

The Company's own energy assets are located in the Norilsk Industrial District and use low-carbon sources for energy generation, such as natural gas and renewable hydropower. Diesel fuel, fuel oil, petrol, and jet fuel are used by Nornickel's transport assets. Use of coal by energy assets is minimised to only small amounts in certain production processes.

The Company's key renewable energy source is hydropower generated by the Group's Ust-Khantayskaya and Kureyskaya HPPs. In 2024, the share of renewables in total electricity generation stood at 54% for the Group and 58% for the Norilsk Industrial District. Renewable energy accounted for 12% of the Group's total energy consumption.

The use of other renewables, such as solar and geothermal energy, within the Arctic Circle is impracticable as Nornickel's core operating assets are located in regions with harsh climatic conditions.

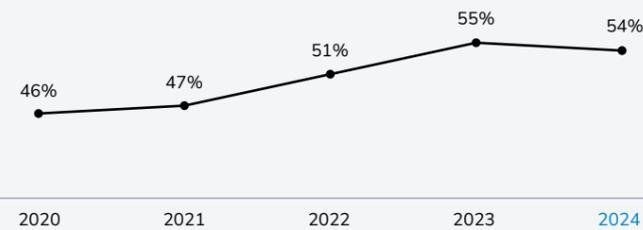
Solar power

8 months a year – air temperatures below freezing point
100 days – duration of polar nights and twilights
70 days per year – sunny days

Geothermal energy

Permafrost: 300 to 500 m deep

Share of renewable electricity consumption



Due to harsh climates, not all renewables are available in the Arctic Circle

Nornickel attaches great importance to improving the energy efficiency of its existing and future production sites. In 2024, the Company invested more than USD 350 million in upgrading its energy infrastructure. The investments cover multiple projects related to equipment replacement at thermal and hydropower plants and upgrades to fuel tank storage facilities, power grids, and gas pipelines.

Permafrost monitoring

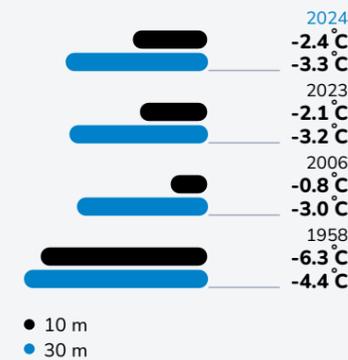
The system developed by Nornickel to monitor permafrost and the facilities built on it enables assessments of the impact permafrost degradation has on the stability of engineering structures in regions of operation while managing related risks.

Climate change in the Arctic drives global-scale challenges and poses a significant threat to the security of polar infrastructure.

In recent years, Nornickel focused on building a science-based, practical framework for asset operation management. Deep monitoring wells were drilled in populated areas of the Norilsk Industrial District to study the permafrost soil temperature range and assess the impact of global climate change. A 200-m well in the centre of Norilsk, where temperature measurements have been taken since as early as 1958, was restored and fitted with a thermistor string.

Data from the well are sent twice a day to the Company's Facilities Monitoring Centre. Observations showed that in 1958, the base of permafrost was at a 150 m depth, while now it is at 147.7 m. The pace of permafrost thawing at the depth of 10 m was also established: the temperature there has increased by 4 °C since record keeping began, which confirms the steady trend of global warming.

Temperature changes in the well



The technical condition of facilities built on permafrost in the Norilsk Industrial District is monitored to reduce the risk of emergencies. To date, more than 1.8 thousand automated sensors have been installed across 223 facilities to gauge soil temperature and displacement of individual elements, carry out an ongoing control of temperature and humidity in crawl spaces, respond to possible failures of heat and water supply systems, monitor for relative deformation of structures.



The Centre's experts run a range of geotechnical surveys, including visual inspections, geodetic monitoring, and manual measurement of groundwater level and foundation soil temperature. All data is fed into the Norilsk Division's information and diagnostic system in real time and is used to monitor the safe operation of buildings and structures not only at the Norilsk site, but also at the Energy Division enterprises. The automatic monitoring system enables data analysis, including tracking of all deviations that reduces response

time, as well as registration of soil and air temperature increase trends in crawl spaces and proactive actions to prevent any adverse effects. The system is also a database that contains all the information about such buildings: engineering surveys, design documents, related comprehensive inspections, and other materials. The system enables communications with property owners to issue and check compliance with recommendations as well as generate reports on a lot of metrics. Currently, the information

and diagnostic system covers 17 Company enterprises and more than 600 employees.

A new approach based on the methods of mathematical modelling of thermal and mechanical interaction was developed to assess the impact of climate change on the stability of facilities in the Norilsk Industrial District. It relies on the climate change forecast across the Company's footprint, prepared by leading research institutions. This approach is currently being tested at the Company's critical facilities covered by the automatic monitoring system.

Background monitoring

Nornickel was the first Russian commercial organisation to set up its own regional system of background permafrost monitoring. The data obtained can be used to supplement the database on the condition and changes of permafrost in the natural environment, quantitatively predict changes in permafrost conditions, and assess natural and anthropogenic impacts on the soil temperature.

Thus, the Company now has geotechnical and background monitoring data that support informed and economically sound decisions regarding further operation of assets.

To date, studies have covered an area of about 8 thousand sq km stretching from the Norilsk Industrial District to Dudinka, and identified 11 testing grounds that best reflect the diversity of landscape and geocryological conditions. In 2023–2024, the Company drilled 20 monitoring wells with a depth of 10 to 20 m and three wells with a depth of 200 m to assess permafrost characteristics and determine the parameters of terrestrial heat flow. Before that in 2022, Nornickel also drilled five 200-m wells in populated areas as part of its permafrost monitoring programme. The drilled wells are equipped with automated thermometric equipment that transmits data to the central data collection and processing server. Selected testing grounds are subject to monitoring of not only soil temperature but also risks of dangerous cryogenic processes by geophysical and geodetic methods. Fedorovsky Polar State University has equipped several

testing grounds to hold winter and summer field schools to study permafrost.

In 2023, the background permafrost monitoring system received the National Environmental Prize named after V.I. Vernadsky, and in 2024, it won the Green Eurasia climate competition and received the GenerationS Innovation Award (GIA) for corporate innovations in Russia.



Social policy

Contribution to the UN SDGs



Development of local communities

- ✔ **Infrastructure development**
- ✔ **Ecological wellbeing**
- ✔ **Improving the living standards for local communities**
- ✔ **Supporting the interests of indigenous peoples of the North**

Nornickel is playing an important role in the Russian economy and has a strong impact on the social and economic life in its operating regions. With its enterprises located mostly in single-industry towns, Nornickel seeks to foster a favourable social climate and create a comfortable urban environment, providing its employees and their family members with ample opportunities for self-fulfilment.

Social expenses
(RUB MLN)



Payments under social programmes
(RUB MLN)



In 2024, the Company's social spending amounted to RUB 12.0 billion, with charity expenses of RUB 14.0 billion and

accruals and changes in estimates of liabilities under social programmes of RUB 4.2 billion (revenue).

The harsh climate faced by Nornickel employees in life and at work, the remoteness of the Company's key industrial facilities, and the increasing competition for human capital across the industry call for a highly effective social policy that would promote Nornickel's reputation as an employer of choice.

Nornickel fosters partnership relations with local communities in all its regions of operations and actively participates in developing and implementing social programmes.



For more details on the charity expenses, please see the [Charity section](#) of this Report.



Corporate healthcare

To ensure best recreation and treatment for its employees, the Company improves workplace amenities and runs the Corporate Healthcare project.

It is focused on promoting private healthcare services to supplement public healthcare in the key regions of operations – the Norilsk region and the Kola Peninsula – and provides access to high-quality and affordable medical care for Company employees and their families.

Air quality monitoring

At the end of 2024, Nornickel launched an automatic air quality monitoring system in Norilsk. This is one of Russia's first projects enabling real-time assessment of air pollution levels.

For the project, 16 environmental monitoring stations were installed in the Norilsk Industrial District to measure the air content of sulphur dioxide (SO₂), hydrogen sulphide (H₂S), carbon monoxide (CO), nitrogen dioxide (NO₂) and dust, as well as temperature, pressure, and humidity. The data from sensors is collected on a single platform that monitors air quality in different districts of the Greater Norilsk 24/7: Norilsk, Talnakh, Kayerkan, and Oganer. The information is updated every 20 minutes.

Since the monitoring system was launched in test mode at 2022-end, the Company has been improving the system to make it convenient for all users, primarily Norilsk residents.

Today, the monitoring data are used to calculate an air quality index, which is posted on the [норильск.рф](https://norilsk.ru) website and uses colour indication: green – no pollution, yellow – moderate pollution, red – high pollution.

Norilsk renovation

One of the most important ways to attract and retain employees is to improve the quality of life in Norilsk and the Norilsk region.

In 2021, Nornickel signed a quadripartite agreement with federal and regional authorities on renovating Norilsk's housing and social infrastructure. Valid until 2035, the agreement envisages project investments of RUB 120 billion, with RUB 81 billion to be contributed by the Company.

Under the project, a Norilsk development master plan and a programme for the city's social and economic development until 2035 have been approved, and the renovation of the housing stock started. The programme also includes construction and overhaul of social infrastructure facilities (clinics, kindergartens, a sports centre, the Arctic Museum of Modern Art, tourist facilities and infrastructure, etc.), landscaping (urban greening, improvement of areas adjacent to city parks and recreation centres), and upgrades of utilities and transport infrastructure.



For more details on the renovation plans, please see the [Norilsk 2035](#) website.

Clean Norilsk

In 2021, the Company launched the Clean Norilsk programme for cleaning and recycling industrial waste in the Norilsk Industrial District and land reclamation, including cleaning and beautification of public spaces, protection of water bodies, and the enhancement of local holiday camps.

On a 10-year horizon, the programme envisages dismantling 500 abandoned buildings and cleaning away 600 kt of scrap metal and 2 mln t of waste. In 2024, 59 buildings were dismantled, and 148 kt of waste was removed, with 14 kt of scrap metal sent for recycling.

Support for indigenous peoples

Indigenous peoples of the North living on the Taimyr Peninsula



Nornickel's engagement with the indigenous peoples of the North is guided by the goals of promoting their sustainable development, enhancing their quality of life, and preserving their traditional habitats. They cover Nenets, Dolgans, Nganasans, Evenks, and Enets on the Taimyr Peninsula, and Sámi, Nenets, and Komi in the Murmansk Region. Nornickel compiles with all applicable international standards and regulations regarding the support for indigenous peoples of the North and recognises the rights of local communities to maintain their traditional lifestyle, indigenous trades, culture, and historical heritage.

Although Nornickel is not a resident of the Arctic zone, the Company voluntarily adheres to the provisions of the Standard of Responsibility for the Residents of Russia's Arctic Zone, integrating them into its principles of engagement with indigenous peoples living on the Taimyr Peninsula.

In 2024, the Board of Directors approved a new Policy of Engagement with Indigenous Small-Numbered Peoples, which is based on international standards and the experience gained during projects and programmes to support the indigenous peoples of the Taimyr Peninsula. The document was prepared jointly with independent experts and with the direct input of representatives of public organisations and indigenous peoples. The new policy emphasises respect for the individual and collective rights of indigenous peoples, provides for additional due diligence measures, and is based on the following approaches:

- Free, prior, and informed consent (FPIC) in line with standards and recommendations of the International Council on Mining and Metals
- Support and development of traditional trades

- Commitment to the principle of consultations in good faith
- Application to contractors.

The policy also established an independent grievance mechanism.

To maintain a systematic dialogue with indigenous peoples of the Taimyrsky Dolgano-Nenetsky Municipal District:

- the Norilsk site has a dedicated department working with the indigenous minorities and staffed with the right level of indigenous talent
- on the initiative of the indigenous peoples, the Indigenous Communities Coordination Council was established comprising representatives from 58 indigenous tribal communities living on the Taimyr Peninsula.

Nornickel’s strength in engaging with indigenous peoples is driven by its ongoing dialogue with indigenous communities and families and regular discussion of issues as they arise, contributing to better understanding and inclusive engagement.

Nornickel uses a comprehensive approach to engagements with indigenous peoples, consistently scaling related support programmes.

Support programmes are run in the following key focus areas:

- Promoting the development of the Taimyr indigenous communities and traditional economic activities
- Contributing to housing and social infrastructure development in Taimyr communities
- Improving the availability and quality of medical care
- Promoting education and culture
- Supporting sports projects and facilitating tourism.

In 2020, the Company started the Programme for Promoting Social and Economic Development of the Taimyrsky Dolgano-Nenetsky Municipal District of the Krasnoyarsk Territory (the “Programme”) with a funding of RUB 2 billion. The programme incorporated proposals from members of the indigenous peoples of the North living in the Taimyr Peninsula and associations representing the indigenous peoples’ interests, and was completed in 2024. The programme’s terms were detailed in the quadripartite agreement on engagement and cooperation with associations of indigenous peoples..

The programme comprised activities in several focus areas:

- Economic support of traditional lifestyles
- The World of Taimyr grant competition for members of the Taimyr indigenous peoples and non-profit organisations implementing projects on the Taimyr Peninsula in the interests of indigenous peoples
- Infrastructure projects
- Educational initiatives
- Cultural and language projects
- Healthcare .

The Programme made a positive impact on the social and economic life in the Taimyrsky Dolgano-Nenetsky Municipal District and brought the indigenous peoples’ quality of life in the Arctic to a new level:

- The number of orphans needing housing decreased
- The housing stock increased (more than 20% of the housing stock in the Volochanka and Ust-Avam settlements was renovated)
- Medical care became more available (the number of rural health posts in Taimyr settlements grew by more than 25%)
- The traditional economic activities of the indigenous peoples were supported
- The logistics and sales for produce of indigenous peoples were streamlined.

In 2024, in addition to the Programme financing, the Company allocated RUB 100 million to support the indigenous peoples of the North, in particular develop family (tribal) communities, ensure they have all the necessary supplies, and help them prepare for hunting and fishing seasons. These funds were used to purchase snowmobiles, boat motors, satellite phones, quad bikes, inflatable motor boats, and rafts.

In addition, through the Company’s charity programmes, indigenous family (tribal) communities were able to complete a number of important projects on the Taimyr Peninsula:

- A pantotherapy centre, joinery workshops, and a souvenir pavilion were opened
- Necessary fishing quotas were purchased, and commercial fishing grounds were rented
- Several glacier storages at fishing points were repaired
- Offline translation apps supporting indigenous languages were developed
- Assistance was provided to settlement residents in desperate need
- Domestic reindeer herding was supported.

As part of the International Decade of Indigenous Languages proclaimed by the United Nations, the Company financed events on the Taimyr Peninsula aimed at preserving and promoting the indigenous culture: the Indigenous Nomad Camp festival, a youth forum, a folklore festival, and a project to create language nests. The list of events also included Voice of the North, the literary competition in the languages of the Taimyr indigenous peoples; launch of a mobile app to promote ethno-tourism; the International Day of the World’s Indigenous Peoples; and master classes in choreography and decorative arts.

Under an agreement with the Russian Federal Agency for Ethnic Affairs and jointly with MGIMO University, Nornickel supports the Social Diplomacy educational project, which promotes the institutional development of the indigenous peoples of the North, enhancing their

legal literacy, social skills, and effect from participating in decision making on matters related to their rights and legitimate interests.

The Company helps authorised representatives of indigenous peoples from its regions of operation

to contribute to the work of national and international bodies dealing with the rights of indigenous peoples.



For more details on the Programme results, please see the [Sustainability Report](#).

Youth programmes

Add Colours to Your Town

For 12 years running, the Company has been holding the annual Add Colours to Your Town art contest for children and young people living in Norilsk and Monchegorsk to engage them in the creative transformation of the cities, foster place attachment, and build a vision of their future intertwined with where they live. Apart from providing a springboard for art projects, the contest encourages responsible attitudes towards the environment and sustainable use of resources.

Career guidance for school students

At the beginning of each school year, the Company provides all first-graders in its host cities with A Book on How Metals Helped Build Cities. The book tells about metals and mining jobs and production processes, fosters a feeling of pride for Nornickel among children and helps them relate to what Nornickel does, as well as promotes scientific knowledge and makes science more attractive.

Shine art festival

In 2024, Nornickel supported the Shine public art festival held in the Pechengsky District, whose key message was that we can and should improve the environment we live in, and a summer city festival is an excellent place to promote environmental agenda. The festival covered several arts such as street art, singing, music, and dance. Everyone could attend master classes on recycling and reusing pre-collected plastic.

During the festival, more than

3 THOUSAND LOCAL RESIDENTS

attended creative laboratories, masterclasses and workshops, with the most active participants recognised with prizes



In 2024, the Company spent over
RUB 495 MLN¹
on projects to support indigenous peoples

¹ Funded under the Programme.

Charity programmes

Charity expenses (RUB MLN)



World of New Opportunities

Nornickel's World of New Opportunities charity programme is focused on building social skills among local communities, demonstrating and incorporating new social technology as well as supporting and encouraging community initiatives and intersectoral partnerships.

In 2024,
>30
THOUSAND PEOPLE
attended the World of New Opportunities events.



The programme's key focus areas in 2024

Focus area	Programmes and projects
Develop!	<ul style="list-style-type: none"> We Are the City! social technologies forum Socially Responsible Initiatives Competition World of Taimyr project contest Travel Grant Competition We Are the City! picnic Launch of the Mobile E-Learning digital platform in the Murmansk Region Peremena: Change Starts with You education project
Invent!	<ul style="list-style-type: none"> IMAKE engineering marathon IN'HUB International Forum of Innovators
Act!	<ul style="list-style-type: none"> An accelerator for regional entrepreneurs and an investment round
Create!	<ul style="list-style-type: none"> Norilsk Development Agency Second School centre for community initiatives in the Pechengsky District Monchegorsk Development Agency

The programme's goals include developing the service economy across Russian regions, improving the business climate, and facilitating the development of small- and medium-sized businesses, including social entrepreneurship. The Company annually delivers programmes for business communities and provides support from trainers and mentors. On top of this, in 2024, Nornickel provided access to entrepreneurship trainings and financial aid for launching a business to high school and university students based in Norilsk.

In 2024, Norilsk provided refinancing for SMEs that had received the Company's support in 2020–2023. Businesses could obtain interest-free

loans to expand existing operations and start new projects, provided they had not previously defaulted on payments. Nine entrepreneurs based in Norilsk took advantage of this support measure, with the total amount of interest-free loans at RUB 29.1 million. In the Murmansk region, nine entrepreneur projects received financing of RUB 7.5 million in 2024. The Second School centre for community initiatives in the Pechengsky District also allocated more than RUB 15.9 million to support three projects.

In 2024, Nornickel launched the Business in a Good Company programme as part of its corporate youth community, aimed at stimulating interest and positive attitude towards entrepreneurship among young Company employees, building employees' entrepreneurial skills, and encouraging their intra-corporate entrepreneurial ventures.

Nornickel was assigned an A+ in the Corporate Philanthropy Leaders 2024 rating by the Donors Forum.



For more details on the World of New Opportunities programme, please see Nornickel's [2024 Sustainability Report](#).

Socially Responsible Initiatives Competition

The Socially Responsible Initiatives Competition under the World of New Opportunities programme has been held since 2014. Over 3.6 thousand applications have been submitted to the competition over the 11 years, with support granted to more than 950 projects for a total of more than RUB 1 billion. The competition's sponsors note that

each year, the quality and definition of applications improve, the number of partnership projects increase, and the range of social services provided by participants is expanding.

In 2024, 371 participants applied for the competition, with 168 initiatives highly rated by independent experts and making it to the finals. The Norilsk Industrial District traditionally accounted for the largest share of applications. For example, one of them, submitted by young teachers, envisages fitting out Norilsk schools with equipment to develop students' technical skills.

In the Murmansk region, the most popular competition categories were Pole of Energy and Pole of the Future for projects promoting sports and healthy lifestyles as well as introducing new methods and technologies to work with children, teenagers, and youth. In the Trans-Baikal Territory, one of the largest projects will be a project to preserve the Mongolian gazelle. Another project provides for area improvements in the Gazimursky Zavod village.

The Company takes systematic steps in working with competition participants, offering educational programmes and travel grants, engaging employee volunteers in various projects, and facilitating partnerships with local businesses to monetise and scale social projects.

Peremena: Change Starts with You education project

During the year, the Company continued its Peremena: Change Starts with You project, which brings together all stakeholders of the educational process: children, parents, and teachers. Over 2 thousand people from six localities took part in the project.

The project includes the annual Peremena: Urban Academy. In August 2024, Krasnoyarsk hosted another Academy, attended by school students of grades 8–10, accompanying teachers, and Academy graduates.

The summer Academy offered its participants master classes on public speaking, production, project approach, social design from idea to reality, urbanism, and event management. In addition to the classes, they had tours around Krasnoyarsk, the city port and shipyard, the Yadro creative coworking space, the School of Gastronomy at SibFU, and the Krasnoyarsk Pillars nature reserve.

IMAKE engineering marathon

The IMAKE engineering marathon brings together aspiring makers, future engineers, inventors, and scientists. The Company leverages this project to build a system of educational activities that promote science among children and teenagers.

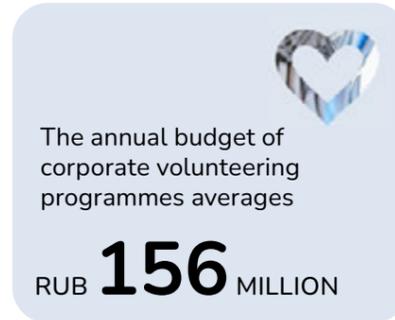
In 2023, the Company launched IMAKE.PRO, an idea packaging course on how to turn an idea into a quality application, identify the necessary resources, calculate the budget, and make a project implementation plan. In 2024, more than 20 students applied for various competitions, including four applications under the World of New Opportunities programme.

Between December 2023 and the end of 2024, school students from Norilsk, Monchegorsk, Chita, and Nikel participated in several international competitions, including the PowerTech 2024 / PowerTech STEAM-Star International (Overseas Invitational Contest). With four IMAKE teams participating, the Monchegorsk team topped the competition, and the Norilsk team ranked second.

In 2024, school students from Arctic cities also topped the International Exhibition for Young Inventors (IEYI) 2024, collecting a full set of medals.

Corporate volunteering

Nornickel has been running its employee volunteering programme since 2015, bringing together many volunteer and charity projects across its footprint. The programme supports employee volunteers' social initiatives aimed to contribute to the social development of our operating regions and better quality of life for local communities. Since the programme's launch, the employee



volunteer community has grown significantly, from a few hundred to more than 4 thousand members. Nornickel volunteers annually engage about 40 partners and organise over 410 events, ranging from educational to environmental projects.

To involve employees in addressing pressing local community issues, the Company has a programme of employees' personal donations for charity and other public benefit purposes. In 2024, over RUB 3 million was raised through such donations, and Nornickel added the same amount to the total. Among other things, the Company collects humanitarian aid to purchase hygiene items, clothes and shoes, and stationery for children from boarding schools as well as large and low-income families. More than 200 children received the assistance in 2024.



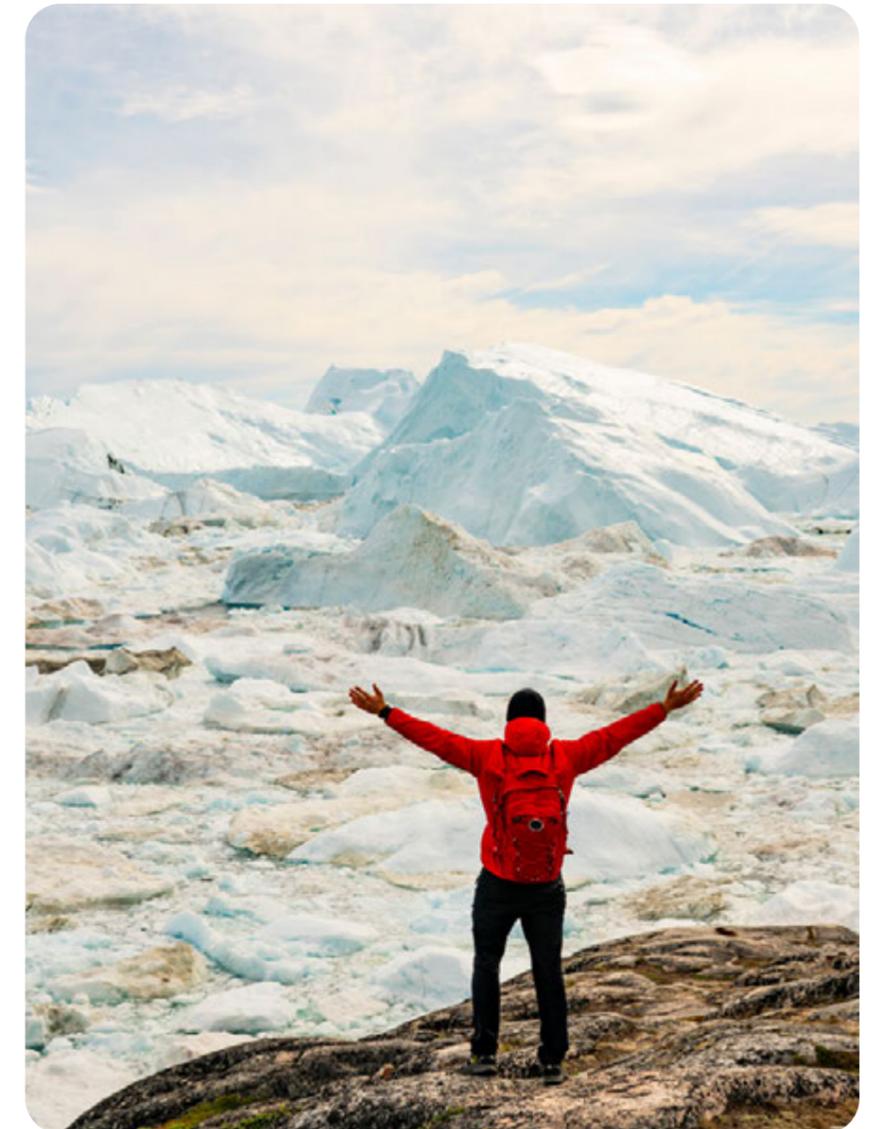
For more details on volunteering activities, please see the Company website and the [2024 Sustainability Report](#).

Tourism

Nornickel promotes tourism in the Arctic zone to contribute to the local social and economic development, helps equip quality recreational areas and put a spotlight on the unique nature, and creates jobs, including for its own employees released after production upgrades.

For example, in the Norilsk Industrial District, close to the Putoransky Nature Reserve borders, the Company is building the Zatundra tourist facility, in line with environmental laws and the principles of respect for environment. The project includes renovation of the historic house at Lake Lama, built in 1941 for the recreation of children of Norilsk Plant employees. Another project facility, the four-star Neralakh park hotel, is currently under construction. While the project is not yet fully complete, Zatundra already welcomed more than 350 guests in 2024.

In the Murmansk Region, the Valla Tunturi tourist centre is being built at the Barents Sea. There are already 32 guest houses operating under the Whale Coast brand, road construction is underway, and hiking trails and routes are being prepared. In 2024, Whale Coast was recognised as the best glamping site in Russia.



Procurement and responsible supply chain

Management approach

Nornickel takes a responsible approach to working with suppliers and consumers, making sure that its partners comply with applicable laws and regulations, ensure safe working conditions, and are passionate about caring for the environment. The Company expects its counterparties to comply with international and Russian best practices in sustainability and environmental stewardship.

The following key documents guide supply chain and procurement management at Nornickel:

- [Supplier Code of Conduct](#)
- [Responsible Sourcing Policy](#)
- Internal corporate procurement standards
- [Business Ethics Code](#)
- [Human Rights Policy](#)

To mitigate operational and financial risks and costs as well as improve supply reliability and cadence, the Company applies procurement policies.

As of the end of 2024, there were 50 category procurement policies in place, four of which were updated

during the year. In the reporting year, the Company also approved a programme to improve procurement efficiency aimed at:

- optimising the costs of inventory, works, and services (zero inflation)
- meeting working capital targets in terms of inventory reduction
- increasing supplier competition
- increasing transparency and strengthening control of procurement procedures.



Procurement

Nornickel engages with suppliers via open tender procedures. Nornickel's procurement system focuses on timely and fully meeting the Company's needs for required materials and services of specified quality and at an acceptable price.

Procurement process

Nornickel's procurement process is certified to standards ISO 9001 and ISO 14001.

The Company procures over 40 aggregated purchasing categories, from heavy industrial equipment to food. In doing so, Nornickel provides equal competitive opportunities for large, medium, and small businesses alike, guided by generally accepted standards of fair competition and the principles of avoiding conflicts of interest. To maximise procurement effectiveness and transparency, the Company's procurement activities are mostly centralised at its Head Office through automated systems and electronic trading platforms.

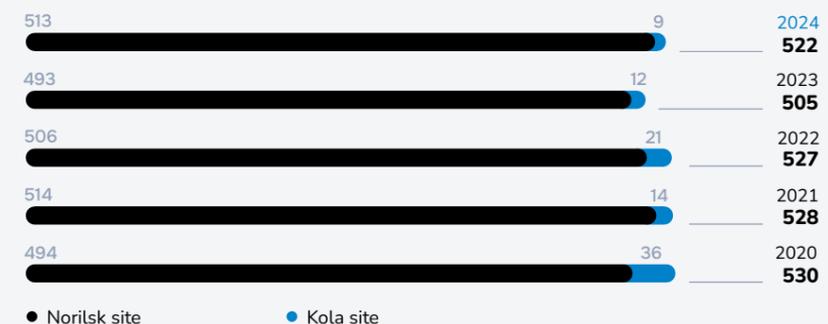
Depending on the budgeted cost, procurement can follow a tendering, simple, or simplified procedure. Based on the materiality and parameters of purchases, the qualification results and the winning bidder in the procurement process are approved by the collective procurement body composed of representatives from various functions of Nornickel. The contract with the winning bidder is signed in accordance with the approved results of the procurement procedure. All of the Group's centralised procurement transactions are detailed on the Company website.

In 2024, procurement by collective bodies of the Head Office (tender committee, tender commissions) totalled about RUB 94 billion.

As the Company aims to work with reliable suppliers meeting their obligations regarding delivery dates and the quantity and quality of products supplied, during the procurement procedure, all suppliers undergo mandatory qualification screening against formalised criteria and rules.

Nornickel gives preference to local suppliers to provide social support to its operating regions. Along with saving jobs, this policy supports unique enterprises whose continuous operation is essential to both the well-being of their employees and the wider social fabric of local communities.

Supplier companies in centralised procurement



Nornickel has in place the Corporate Trust Line that can be used by any stakeholder to report any violations.

Supplier engagement

Efficient and convenient communications with suppliers at Nornickel, are enabled through its SRM procurement management system that gives suppliers anytime access to information about the Company's procurement procedures. In 2024, 1,632 suppliers were added to Nornickel's SRM system, with more than 13.7 thousand suppliers accredited in total as at year-end. The Company also engages with original equipment manufacturers (OEMs) to accredit them on this e-platform.

Sign-up for Nornickel's SRM system is free of charge and does not impose any obligations on users.

One of the channels used by the Company to interact with suppliers is the Suppliers section on its website, containing key information on the procurement principles and procedures, planned needs as well as announcements and invitations to participate in tenders.

Nornickel procurement specialists are active members of the professional community in their respective purchasing categories, attending industry exhibitions and participating in conferences.

The Company's priority in driving supplier engagement is to provide robust feedback mechanisms, which are also implemented, improved, and enhanced in the supplier's personal account in

SRM. Designed for communicating with counterparties during contract execution, the system is continuously improved to optimise and boost performance for all users. Suppliers can get updates on Nornickel's procurement procedures and opportunities by communicating online with procurement teams in all product categories in Nornickel's SRM procurement management system.

In their personal accounts, counterparties can manage the documents generated for contract purposes, track work stages, and exchange files and instant messages with contract managers to request clarifications and accelerate communication. The service helps to keep suppliers better informed about contract execution progress while also ensuring transparency of transactions and significantly

If a counterparty faces difficulties signing up or using the system, they can seek help and advice

- via e-mail suppliers@nornik.ru
- or by phone at:
+7 495 783 0045, ext. 6 (for calls within Moscow);
8 800 700 5911, ext. 6 (toll-free federal number).

speeding up daily communication between the parties. All supply terms and conditions are specified in the contracts or agreements signed with suppliers.

The supplier's personal account also enables sign-up for other services, such as electronic document

management, factoring, and dynamic discounting, forging a stronger partnership.

Nornickel is also working on expanding and supplementing the list of services and consolidating them in the personal account to develop relationships with counterparties.

In addition, the Company has implemented and is operating an electronic document management solution for suppliers to speed up mutual settlements and add transparency to the process.

ESG factors in the supply chain



Nornickel seeks to create a common information space and set of values with its suppliers. The Company employs a proprietary multi-tier system to evaluate its suppliers. The criteria for review, evaluation, and re-evaluation of external suppliers have been developed, inter alia, in line with the requirements of ISO 9001:2015 Quality management systems. Nornickel is particularly focused on building relationships with suppliers whose equipment is unique and critical for the stable operation of the Company's production facilities.

The Company's Responsible Sourcing Policy in place sets out Nornickel's approach to promoting ESG throughout the supply chain. The purpose of the Policy is to define the approach to supplier communication on sustainability matters and declare standards and principles to be followed by the Company and its suppliers.

In addition to the Policy, the Company has in place a Supplier Code of Conduct which encourages the Company and its business partners to embed sustainability into supplier relationship management, thus building a responsible supply chain in accordance with Nornickel's ESG requirements.

Provisions of the Policy and the Code are incorporated into supplier contracts: standard forms of agreements and General Contracting

Terms and Conditions were amended to include a clause with a requirement to comply with the Company's sustainability requirements listed in the Code. This clause also informs suppliers on the opportunity to report to Nornickel's Corporate Trust Line, which is the Company's principal grievance mechanism.

Employees trained on responsible supply chain (PEOPLE)



Nornickel’s employees in charge of ensuring compliance with the responsible supply chain procedures regularly attend in-depth trainings on responsible sourcing. In the reporting period, more than 600 people were trained in building a responsible supply chain, with the total number of training hours exceeding 1.8 thousand. In 2025, the Company plans to engage a broader range of participants in its responsible supply chain training. The Company has developed a due diligence management system (DDMS) for metallic mineral supply chains and rolled it out in stages. To date, the system has covered all production assets. The DDMS is focused on identifying potential risks affecting the sustainability of business processes in the mineral supply chain while also minimising risks relating to human rights, money laundering, fraud, corruption, and misinformation about minerals. OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas and its Five-Step Framework for Risk-Based Due Diligence in the Mineral Supply Chain provided a methodological framework for developing the DDMS.

The DDMS is driven by the following requirements and recommendations:

- [Responsible Sourcing Policy](#) and [Supplier Code of Conduct](#)
- LME’s responsible sourcing requirements
- Standards and principles of industry-leading sustainability initiatives: JDDS¹, RCI², RMI³, IRMA⁴, ICMM⁵, and CCCMC⁶
- Requirements of the Company’s customers.

In 2024, the Company conducted due diligence covering 100% of mineral suppliers⁷ at the Norilsk and Kola sites, identifying no supply chain risks.

The Company performs an annual assessment of sustainability practices of its suppliers providing goods, works, and services, based on a range of criteria. The assessment is conducted through a questionnaire survey and includes verifying the compliance of sustainability practices with the Code requirements. The Company uses the results to identify areas of improvement in supplier activities related to responsible supply chain management.

The supplier self-assessment questionnaire (SSAQ) is divided into E, S, and G sections. In 2024, based on the results of a pilot survey conducted in 2023, and in line with recommendations from regulators, expectations of rating providers, and stakeholder requests, the Company revised the SSAQ.

In the reporting period, Nornickel more than doubled the supplier survey sample, covering about 35% of all purchases by the Group’s Russian entities (vs 14% in 2023). According to the SSAQ survey findings, the average level of suppliers’ compliance with the requirements is 48%. Most of the suppliers surveyed during the reporting period are privately held companies, and therefore the regulatory requirements and stakeholder expectations regarding their non-financial reporting are lower compared to public companies. However, despite the absence of mandatory requirements, the survey results indicate a sufficient level of maturity in the suppliers’ sustainability practices, taking into account their non-public status.

In 2025, the Company plans to continue its project to assess the sustainability performance of suppliers of goods, works, and services for compliance with Nornickel’s Supplier Code of Conduct.

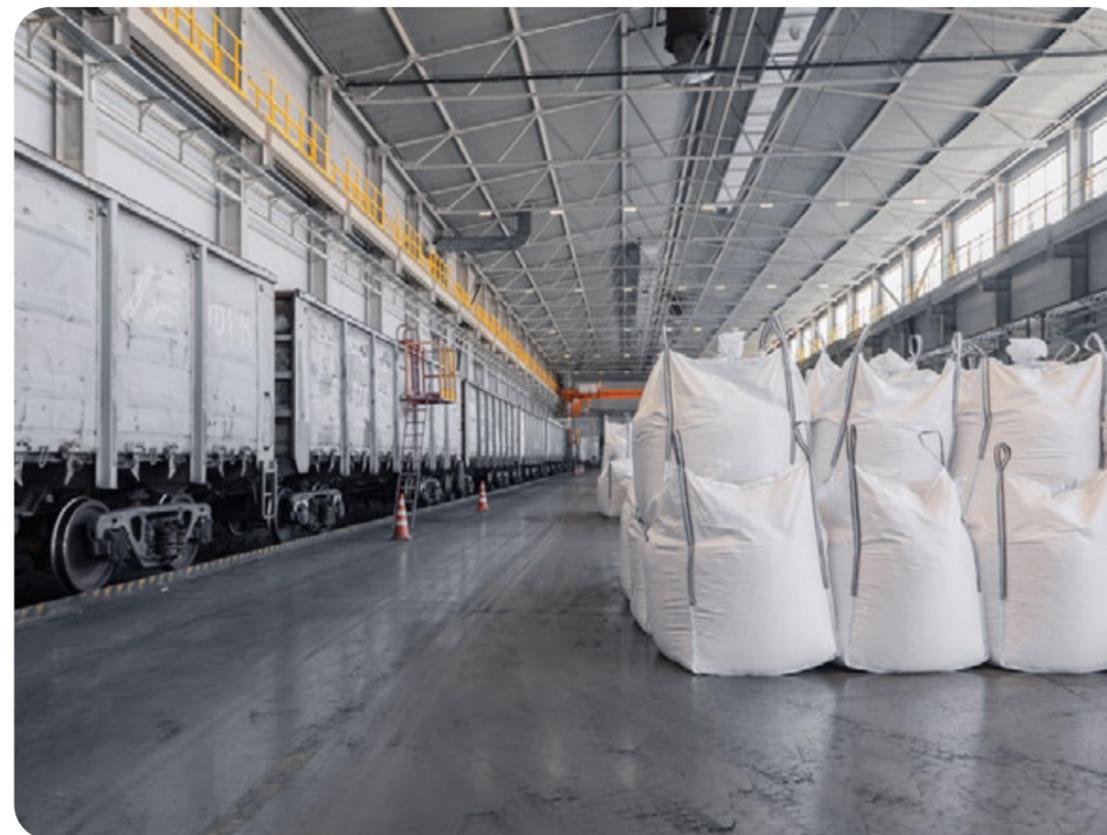
The results of the 2023 and 2024 surveys are not fully comparable, as the composition of the supplier sample changes from year to year. In addition, the 2024 sample size more than doubled, and both the Questionnaire and the assessment methodology were updated, which influenced trends in certain metrics. As part of the survey exercise, Nornickel pays particular attention to raising suppliers’ awareness of sustainability and responsible supply chain, including by holding training sessions, clarifying the Company’s requirements and details of mineral supply chain due diligence procedures and the sustainability survey for suppliers of goods, works, and services, and providing support to suppliers during due diligence and survey.

Since 2023, the Company has been providing annual disclosures detailing its performance and plans around responsible supply chain management in the [Responsible Supply Chain Report](#).

Given the risk of potential negative environmental impact of cargo in transit, the Company’s master agreement sets explicit requirements for cargo packaging. Goods to be shipped must meet the cargo standards and requirements of GOST 26653-2015 Preparation of general cargoes for transportation and GOST 15846-2002 Production for transportation to the areas of the Far North and similar regions. Packaging, labelling, transportation, and storage. Mandatory requirements are established for the transport containers and product packaging that should ensure cargo integrity during multiple transshipments and transportation to the Far North.

Environmental impact is assessed throughout the life cycle of procured products: production, transportation, storage, use, and disposal. Nornickel requires its counterparties to have a functioning environmental management system in place and to ensure that all services and products delivered by them comply with local environmental laws.

ESG maturity assessment of supplier (%)



¹ Joint Due Diligence Standard for Copper, Lead, Molybdenum, Nickel, and Zinc.
² Responsible Cobalt Initiative.
³ Responsible Minerals Initiative.
⁴ Initiative for Responsible Mining Assurance.
⁵ International Council on Mining and Metals.
⁶ China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters.
⁷ Mineral suppliers include suppliers of mined minerals (primary processed material that has never been previously refined) and suppliers providing minerals transportation, processing, and loading/unloading services. “Minerals” are minerals containing nickel, cobalt, and copper.