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Strategic approach

Contribution to the UN SDGs















11 SUSTAINABLE CITIES



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.

Development Centre

Sustainable Development and Climate Change Committee chaired by an independent director

 Monitors the strat Oversees progress on egy's progress and effectiveness

Ecology Department

- sustainability goals and programmes
- Provides the Board of Directors with an opinion on the effectiveness and quality of designing and implementing key sustainability projects

Board of Directors Approves the Company's internal

documents and strategic goals

Vice President - Head of Internal **Control and Risk Management**

Audit Committee

chaired by an independent director

Centre for Monitoring Technical, Production, and Environmental

Senior Vice President - Chief Operating Officer, Head of Polar Division Vice President for Ecology and Industrial Safety

Vice President for Production and Technical Development

Risk Management Committee of the Management Board

Management Board

Risk Management Committee of the Management Board

H&S Department

Sustainable Development Department

- Ensures a systematic approach to building an effective model of sustainability management and its enforcement by the Company
- Develops and implements systems for evaluating the Company's performance for compliance with the requirements and guidance from Russian and international standards, leading industry associations, and best sustainability practices

Senior Vice President - Head of HR, Vice President - Head of Energy Division Social Policy, and Public Relations **Energy Department** Vice President for Human Renewable Energy Development Resources HR Department Centre Social Policy Department Public Relations Department Corporate Healthcare

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

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

- to improve efficiency
 - system
 - management KPIs
 - Directors
 - Widespread application of cutting-edge technologies
 - Cooperation agreements with

- 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

- Changing the management model
- Developing the risk management
- Integrating ESG targets into
- Balanced and effective Board of
- Russian software developers
- 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

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.

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

- 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.



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









https://vk.com/





https://ok.ru/nornickel

https://ru.pinterest.com/

nornickel_ru/





https://dzen.ru/id/6228aa0 deaf2ac6625783852? share to=link

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.





https://t.me/rabotanornickel







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

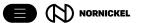
Nornickel annually initiates large-scale research expeditions involving Russian scientists, local historians, and nature reserve personnel. These studies result in a comprehensive assessment of the local environmental conditions in the Arctic regions. They contribute to modern scientific knowledge of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

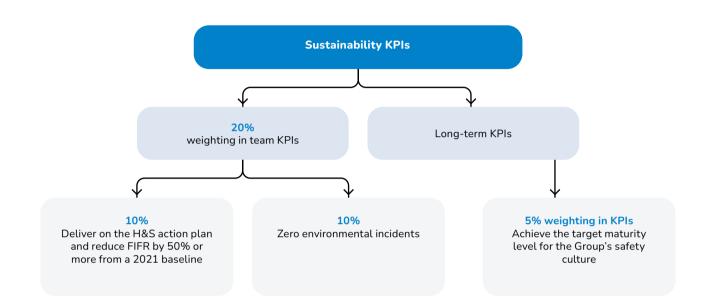
To further deepen the mutually beneficial, long-term partnership between the Company and the region, Nornickel signed an agreement with the Trans-Baikal Territory in November 2024. The agreement, effective until 2029, provides for the consolidation and coordination of collaborative efforts to support 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.



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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	 MMC Norilsk Nickel Kola site Foreign site Trans-Baikal Division 	MMC Norilsk NickelKola siteForeign siteResearch institute	 MMC Norilsk Nickel Kola site Foreign site Trans-Baikal Division 	 Kola site Murmansk Transport Division Nadezhda Metallurgical Plant Copper Plant Talnakh Concentrator
Percentage of certified operations	51%		49% 53	3% 18%

Sustainability initiatives

Initiatives	The Company's compliance with the requirements of the initiative was confirmed by the 2022 follow-up audit	
Together for Sustainability (TfS) initiative		
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 ¹²	
Global Battery Alliance (GBA)	Member since 2021	
London Metal Exchange (LME)	In 2024, the London Metal Exchange accepted reports for five LME-listed Nornickel metal brands	

ESG ratings and scores

Rating providers	Status		
EcoVadis ²	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.