

Governance structure, responsibilities, and oversight of human rights

CHRB A.2.4

The Company has in place a comprehensive governance structure to oversee human rights. Risks related to potential violations in this area are reviewed by the committees of MMC Norilsk Nickel's Management Board and Board of Directors through the analysis of regular risk reports and through the approval of the Company's annual public disclosures, including those on human rights. At the level

of the Board of Directors, matters related to Nornickel's 2030 Socially Sustainable Development Strategy and Human Rights Policy are overseen by:

- the Sustainable Development and Climate Change Committee (responsible for reviewing and approving key policies, standards, and initiatives aimed at incorporating human rights principles into the Company's operations, as well as for reviewing the Company's public sustainability disclosures);
- the Audit Committee (reviews reporting on complaints received through the Corporate Trust Line);
- the Strategy Committee (reviews reporting on work-related injuries).

Human rights in KPIs

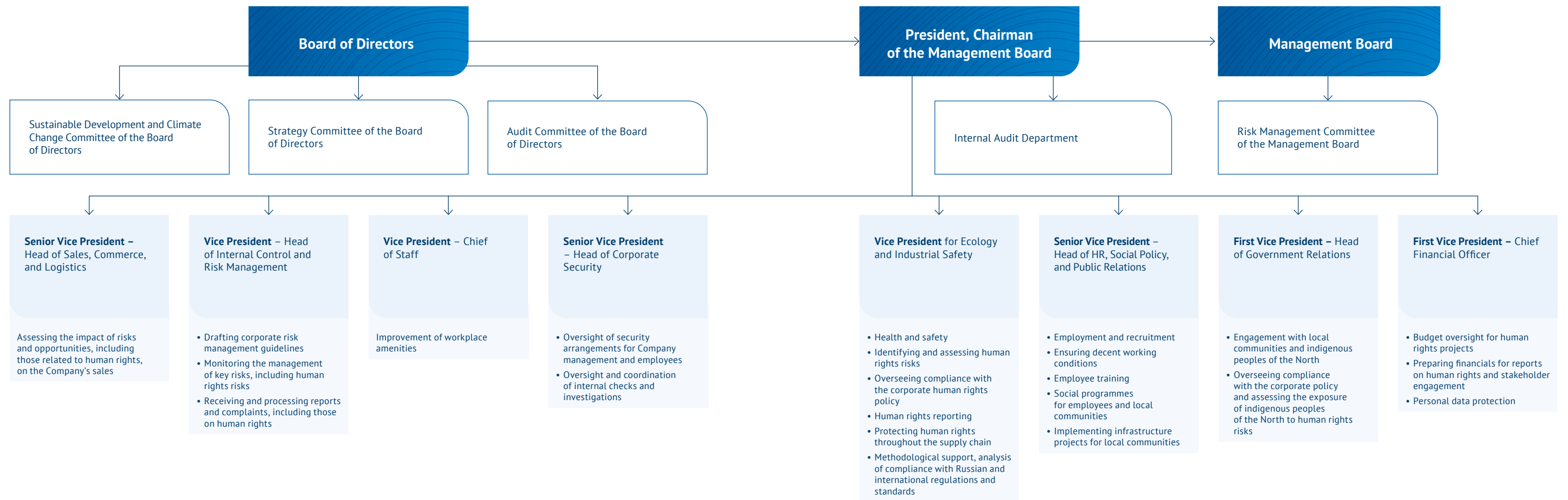
CHRB A.2.3, B.1.2

The Company's senior executives are actively engaged in upholding human rights, with this commitment reinforced by a system of collective annual key performance indicators (KPIs). The KPI structure includes an integrated occupational health and safety indicator, which has a specific weight of 30%.

Alongside systemic, management-level initiatives, the Company introduces additional employee incentives to reinforce safety culture and compliance with human rights principles. In particular, in 2023, the Company rolled out a system of rewards for identifying workplace risks. This initiative not only helps reduce the likelihood of accidents but also actively engages employees in fostering a safe working environment.

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(CHRB A.2.1, CHRB A.2.2, CHRB B.1.1)



¹ For the key functional responsibilities at different governance levels, please see PJSC MMC Norilsk Nickel's Human Rights Policy available on the Company's official website at https://www.nornickel.com/upload/iblock/df8/PJSC_MMC_Norilsk_Nickel_Human_Rights_Policy.pdf.