

# GRI content index

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

GRI Standards 2021 disclosure number	Disclosure	Page/Link	Assured by the auditor	Omissions	Comments
GRI 1: Foundation 2021					
GRI 2: General Disclosures 2021					
1. The organisation and its reporting practices					
2-1	Organisational details	<a href="#">2, 16</a>	Assured		Nature of ownership – private
2-2	Entities included in the organisation's sustainability reporting	<a href="#">298</a>	Assured		<p>There were no material changes to the list of entities included in the boundaries of this Report compared to the list of entities included in <a href="#">Nornickel's 2023 Sustainability Report</a> and the Norilsk Nickel Group's consolidated financial statements for 2023. Section 15 of the Notes to the Consolidated Financial Statements for 2023 discloses a list of the Company's principal subsidiaries.</p> <p>In 2024, five new entities joined the Group that were not engaged in active operational or investment activities and had no material impact on the Group's sustainability performance. In addition, there were other changes that did not affect the list of principal subsidiaries disclosed in 2023</p>
2-3	Reporting period, frequency, and contact point	<a href="#">2, 388</a>	Assured		<p>Financial and sustainability reporting is prepared annually for the calendar year.</p> <p>The date of this Report is 26 May 2025</p>
2-4	Restatements of information	<a href="#">2, 137, 222</a>	Assured		Compared to 2023, the Company revised its methodology for calculating and presenting information under GRI Disclosure 203-1: Infrastructure investments and services supported. For more details on these changes, please see <a href="#">p. 137</a> . Information is disclosed by division (where applicable)
2-5	External assurance	<a href="#">2, 383</a>	Assured		
2. Activities and workers					
2-6	Activities, value chain, and other business relationships	<a href="#">16, 37, 264</a>	Assured		There were no significant changes in the supply chain of the core production process in the reporting year. Due to sanctions imposed on the Russian Federation, the Company is in the process of revising its list of equipment and software suppliers
2-7	Employees	<a href="#">70, 337</a>	Assured		
2-8	Workers who are not employees	<a href="#">337</a>	Assured		<p>The relations with such workers are mainly formalised through independent contractor agreements.</p> <p>Such agreements are typically made for temporary work, with no prevailing type of activity specified. There are no significant fluctuations in hiring within the reporting periods, while changes between reporting periods may be due to an increase in the number of full-time employees (as certain functions are insourced)</p>
3. Governance					
2-9	Governance structure and composition	<a href="#">32, 69, 111, 211, 232</a>	Assured		<p>Information on the tenure of Board members and their skills is disclosed in <a href="#">Nornickel's 2024 Annual Report</a>. Members of the Board of Directors also serve on Board committees.</p> <p>One Board member holds the position of the First Vice President – Head of Corporate Governance, Asset Management, and Legal Affairs, while another serves as the First Vice President – Chief Financial Officer. The other members of the Board of Directors do not hold any significant positions within the Company</p>
2-10	Nomination and selection of the highest governance body	<a href="#">232</a>	Assured		Members of the Board of Directors also serve on Board committees
2-11	Chairman of the Board of Directors	–	Assured		The Chairman of the Board of Directors is not an executive director
2-12	Role of the highest governance body in overseeing the management of impacts	<a href="#">32, 69, 111, 179, 211, 232, 234</a>	Assured		
2-13	Delegation of responsibility for managing impacts	<a href="#">32, 69, 111, 179, 211, 232, 234, 236</a>	Assured		
2-14	Role of the Board of Directors in sustainability reporting	<a href="#">179</a>	Assured		The Sustainability Report, including the list of material topics, has been approved by the Board of Directors, Minutes No. GMK/16-pr-sd dated 26 May 2025
2-15	Conflicts of interest	<a href="#">237</a>	Assured		The Company publicly discloses information on interested-party transactions in its <a href="#">annual reports</a>

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

<sup>1</sup> Except for those Board members who are Company employees.

GRI Standards 2021 disclosure number	Disclosure	Page/Link	Assured by the auditor	Omissions	Comments
Employment and decent working conditions in the regions of operation					
3-3	Management of material topics	<a href="#">68, 75, 138</a> <a href="#">Sustainability report 2022</a> , page 311	Assured		The <a href="#">Equal Opportunities Programme</a> defines the Company's approaches and commitments in providing jobs. The <a href="#">Working Conditions Policy</a> sets forth the Company's principles and commitments in ensuring decent working conditions
201-3	Defined benefit plan obligations and other retirement plans	<a href="#">100</a>	Assured		Payments under the pension plan are made by NPF GAZFOND Pension Savings. For the fund's public financial reports, please see the website at <a href="https://gazfond-pn.ru/about/disclosure/">https://gazfond-pn.ru/about/disclosure/</a>
202-1	Ratios of standard entry-level wage by gender compared to local minimum wage at significant locations of operation	<a href="#">80</a>	Assured	Ratios of entry-level wage by gender compared to local minimum wage at significant locations of operation are not disclosed due to the lack of a relevant accounting system. The Company will consider disclosing this information within three years	The calculation covered Group companies with an average headcount of at least 500 employees in 2024
202-2	Percentage of senior management at significant locations of operation that are hired from the local community	<a href="#">71</a>	Assured		
401-1	Total number and rate of new employee hires and employee turnover by age group, gender, and region	<a href="#">74, 339</a>	Assured		
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation	<a href="#">334, 335</a>	Assured	Partial disclosure. No information is provided for the following types of benefits: life insurance, healthcare, disability and invalidity coverage, parental leave, and stock ownership due to the lack of an approved disclosure methodology for this type of data. The Company will consider disclosing this information within three years	
403-6	Promotion of worker health	<a href="#">96, 99, 127</a>	Assured		The Company respects employees' right to privacy and ensures the confidentiality of their health-related information. Health-related information is classified as a special category of personal data and is processed in full compliance with applicable laws. Under the Labour Code, an employer may not request information about an employee's health, except for details necessary to determine the employee's ability to perform their job functions. The Company does not use data on participation in targeted medical programmes or the use of healthcare services as criteria for decisions related to hiring, dismissal, promotion, demotion, or other employment matters
404-3	Percentage of employees receiving regular performance and career development reviews, by gender and by employee category	<a href="#">341</a>	Assured		
Contribution to the development of local communities					
3-3	Management of material topics	<a href="#">136, 137, 141, 143, 155</a> <a href="#">Sustainability report 2022</a> , page 312	Assured		
201-1	Direct economic value generated and distributed	<a href="#">324</a>	Assured		
203-1	Development and impacts of infrastructure investments and services supported	<a href="#">137, 143, 151, 158, 284</a>	Assured		
203-2	Significant indirect economic impacts	<a href="#">138, 139, 158, 284</a>	Assured		
204-1	Proportion of spending on local suppliers	—	Assured	Not disclosed in accordance with the GRI requirements due to the lack of a relevant accounting system. The Company will consider disclosing this information within three years	The <a href="#">Contribution to the Development of Local Communities</a> section discloses information on the Company's spending on procurement from local suppliers in key regions of operation

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

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306-5	Waste directed to disposal	<a href="#">330</a> , <a href="#">331</a>	Assured	Partially disclosed. Internal waste management practices do not imply energy recovery. No breakdown is provided between incineration with and without energy recovery for municipal solid waste transferred to the regional operator, as the operator independently determines the waste treatment method. The applicable legislation does not require the regional operator to provide this information to municipal solid waste generators	
Climate change					
3-3	Management of material topics	<a href="#">208</a> , <a href="#">305</a> <a href="#">Sustainability report 2022</a> , page 310	Assured		
201-2	Financial implications and other risks and opportunities due to climate change	<a href="#">216</a>	Assured	The financial implications of the risk are not disclosed, as no such assessment has been carried out. The assessment of financial implications is planned over the next 3 to 5 years	In 2024, climate-related expenditures, including spending on initiatives to improve energy efficiency and to establish a monitoring system for buildings and structures built on permafrost, amounted to RUB 4.8 billion
302-1	Energy consumption within the organisation	<a href="#">228</a> , <a href="#">229</a>	Assured		The Company uses statistical reporting forms adopted in Russia to record energy consumption data. Conversion factors into terajoules (TJ) are based on the GRI 3.0 Guidelines and Engineering Journal, Russian R&D reference book.  The Company does not consume cooling energy in its operations. It also does not sell cooling or steam energy
302-3	Energy intensity	<a href="#">228</a>	Assured		
302-4	Reduction of energy consumption	<a href="#">214</a>	Assured		Reduction in energy consumption is calculated based on the technical specifications of equipment and other energy-consuming devices replaced under energy efficiency initiatives, as the difference between the consumption of the new, more energy-efficient equipment and that of the old, less energy-efficient equipment
305-1	Direct (Scope 1) GHG emissions	<a href="#">222</a>	Assured		To calculate GHG emissions, the Company used relevant global warming potential (GWP) values from the IPCC's Sixth Assessment Report, which are 1 for CO <sub>2</sub> , 27 for CH <sub>4</sub> (bio, comb), 29.8 for CH <sub>4</sub> (fug), and 273 for N <sub>2</sub> O
305-2	Energy indirect (Scope 2) GHG emissions	<a href="#">222</a>	Assured		
305-3	Other indirect (Scope 3) GHG emissions	<a href="#">224</a>	Assured		
					The calculation includes the following greenhouse gases: carbon dioxide (CO <sub>2</sub> ), nitrous oxide (N <sub>2</sub> O), and methane (CH <sub>4</sub> ), with emissions of other greenhouse gases either absent or insignificant.  Biogenic CO <sub>2</sub> emissions are not applicable
305-4	GHG emissions intensity	<a href="#">222</a>	Assured		
305-5	Reduction of GHG emissions	<a href="#">214</a>	Assured		In 2024, GHG emissions avoided totalled 259.7 kt of CO <sub>2</sub> equivalent, including 79.2 kt of Scope 1 emissions avoided as a direct result of energy efficiency initiatives, and 180.5 kt of Scope 2 emissions avoided through direct bilateral power purchase agreements (PPAs) for low-carbon electricity.  The methodology for calculating emissions avoided as a direct result of energy efficiency initiatives is based on the calculation for Disclosure 302-4 (an estimate of the emissions avoided as a result of reduced energy consumption)
Health and safety					
3-3	Management of material topics	<a href="#">110</a> <a href="#">Sustainability report 2022</a> , page 312	Assured		
403-1	Occupational health and safety management system	<a href="#">110</a> , <a href="#">112</a> , <a href="#">117</a>	Assured		

GRI Standards 2021 disclosure number	Disclosure	Page/Link	Assured by the auditor	Omissions	Comments
403-2	Hazard identification, risk assessment, and incident investigation	<a href="#">112</a> , <a href="#">117</a>	Assured		<p>Health and safety risks are identified and assessed at all Group entities covered by the Report, either on an annual basis or ad hoc, as described in the STO KISM 121-211-2017 corporate integrated management standard or similar standards in place at Group entities. The quality of these processes is ensured through the alignment of assessment requirements with the above standards. Employees can report work-related hazards through the following channels:</p> <ul style="list-style-type: none"><li>• Orally to their immediate supervisor</li><li>• Through problem-solving board installed at all sites</li><li>• By sending messages to the relevant H&amp;S unit</li><li>• Through authorised representatives in H&amp;S committees</li><li>• At staff meetings</li><li>• By submitting a work refusal form</li></ul> <p>All work-related injuries are investigated by a dedicated commission as stipulated by national laws</p>
403-3	Occupational health services	<a href="#">120</a> , <a href="#">126</a>	Assured		<p>Contractors work on the Company's premises under contracts that include mandatory health and safety requirements. Before work commences, the Company carries out a range of preparatory measures to ensure its safe execution. During contract execution, the contractor undertakes to independently provide its employees with personal protective equipment. The contractor is also responsible for ensuring compliance with sanitary and epidemiological standards and implementing all necessary health and safety measures. Throughout the course of the work, Nornickel monitors contractor employees' compliance with H&amp;S requirements. In addition, the Company provides contractor employees with access to first aid through on-site first-aid posts located at production sites</p>
403-4	Worker participation, consultation, and communication on occupational health and safety	<a href="#">124</a>	Assured		
403-5	Worker training on occupational health and safety	<a href="#">112</a> , <a href="#">124</a>	Assured		
403-8	Workers covered by an occupational health and safety management system	<a href="#">343</a>	Assured		
403-9	Work-related injuries	<a href="#">114</a> , <a href="#">341</a>	Assured		Data on total recorded injuries are shown in accordance with the Company's accounting system based on Russian laws
403-10	Work-related ill health	<a href="#">114</a> , <a href="#">341</a>	Assured	<p>The number of fatalities as a result of work-related ill health is not disclosed due to the confidential nature of this information and the absence of permission for its use by the government agencies responsible for its storage and record-keeping.</p> <p>Information on work-related ill health among contractors is also not disclosed, as it is not possible to definitively determine whether such cases are directly attributable to work performed at the Company's facilities.</p> <p>Information on the types of work-related ill health and the contributing factors is not disclosed due to the lack of consolidated records. The Company will consider developing an appropriate accounting system within the next three years</p>	
<b>Biodiversity</b>					
3-3	Management of material topics	<a href="#">199</a> <a href="#">Sustainability report 2022</a> , page 311	Assured		
304-1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	<a href="#">200</a>	Assured		The Company has no sites in protected areas or areas of high biodiversity value

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

<sup>1</sup> International Union for Conservation of Nature and Natural Resources.



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Industrial environmental safety of production facilities (including tailings storage facilities)					
3-3	Management of material topics	<a href="#">130, 193</a> <a href="#">Sustainability report 2022</a> , page 311	Assured		
306-3 (2016)	Significant spills	—	Assured		In 2024, there were no significant spills
Responsible exploration and land rehabilitation					
3-3	Management of material topics	<a href="#">195</a> <a href="#">Sustainability report 2022</a> , page. 31	Assured		
Responsible supply chain					
308-1	New suppliers that were screened using environmental criteria	—	Assured		Partial disclosure. The existing supply chain due diligence management system covers suppliers, processors, and transporters of metal-containing mineral feedstocks ("mineral suppliers") as well as suppliers of goods, works, and services (i.e. all categories of the Group's suppliers). As part of this due diligence, 12 active mineral suppliers <sup>1</sup> were assessed in 2024, with 11 of them evaluated against environmental and social criteria. In 2024, the Company engaged two new mineral suppliers (they are included in the group of 12 active mineral suppliers mentioned above). Both new suppliers were assessed, with one of them also evaluated against environmental and social criteria. Following the assessment, all audited mineral suppliers were found to meet the environmental and social criteria set out in <a href="#">PJSC MMC Norilsk Nickel's Supplier Code of Conduct</a> . No significant environmental or social risks were identified. During the reporting period, the Company assessed the sustainability practices of a sample of goods, works, and services suppliers for compliance with the Code requirements. The sample covered 35% of the Group's total procurement volume. The survey results for the goods, works, and services supplier sample are disclosed in detail in <a href="#">Nornickel's 2024 Responsible Supply Chain Report</a>
308-2	Negative environmental impacts in the supply chain and actions taken	—	Assured		
414-1	New suppliers that were screened using social criteria	—	Assured		
414-2	Negative social impacts in the supply chain and actions taken	—	Assured		
Anti-corruption and business ethics					
205-1	Total number and percentage of operations assessed for risks related to corruption, and significant risks identified	<a href="#">260</a>	Assured		In 2024, the assessment of corruption-related <sup>2</sup> risks covered 77 units, representing 89% of all Group units
205-2	Communication and training about anti-corruption policies and procedures	<a href="#">257</a>	Assured		All members of the Board of Directors carry out their duties in practice in Moscow. The Company's anti-corruption policies and procedures have been communicated to all members of the Board of Directors (13 people). In 2024, access to training on anti-corruption policies and procedures was provided to all members of the Board of Directors (13 people). The Anti-Corruption for Managers remote learning course is available at any time to all members of the Board of Directors via the Nornickel Academy platform.  The Anti-Corruption Policy is communicated to counterparties when contracts are concluded
205-3	Confirmed incidents of corruption and actions taken	<a href="#">256</a>	Assured		
Respect for human rights (including those of indigenous minorities)					
401-3	The proportion of employees that returned to work after parental leave ended and the proportion of employees that were still employed after their return to work, by gender	<a href="#">340</a>	Assured	Partial disclosure is used due to the lack of a relevant accounting system; information is provided on the total number of employees that took maternity and/or childcare leave and employees that returned to work after the leave ended. The Company will consider developing an appropriate accounting system within the next three years	
402-1	Minimum notice periods regarding operational changes	<a href="#">77</a>	Assured		
405-1	Diversity of governance bodies and employees	<a href="#">71, 72, 324</a>	Assured		

<sup>1</sup> In the reporting period, a mineral supplier due diligence was conducted, including on internal suppliers within the Nornickel Group.

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



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

<sup>1</sup> In the reporting period, a mineral supplier due diligence was conducted, including on internal suppliers within the Nornickel Group.