

Reporting boundaries

(GRI 2-2)

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

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

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

The reporting boundaries include data from the Company's Russian business units, whose specific names are not disclosed in the text of the Report due to the current geopolitical situation. Currently, the ability to collect, independently verify, and disclose information on the Company's Foreign Business Units is limited. The Group's only significant foreign production entity, which makes part of the Polar Division, discloses sustainability data on its [official website](#) as a separate set of indicators (ESG Databook). Other Foreign Business Units are insignificant in terms of sustainability impacts.

Furthermore, the reporting boundaries do not include investment assets that are outside the Group's control unless they form a significant part of the Group's production chain. In 2024, the Company did not carry out any major mergers or acquisitions that would have a substantial impact on the reporting boundaries. No significant changes from prior periods in terms of scope, boundaries, or measurement methods applied in this Report were recorded.



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

Reporting boundaries for material topics

Legend

All assets of the Subgroup are included		Assets of the Subgroup with the most significant impacts are included		Entities of the Subgroup are not included	
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Material topics	GRI disclosures	Polar Division ²	Trans-Baikal Division	Energy Division	Sales Division ²	Head Office	Other Group enterprises
Training and education	404-1, 404-2						
Employment and decent working conditions in the regions of operation	201-3						
	202-1, 202-2						
	401-1, 401-2						
	403-6						
	404-3						
Contribution to the development of local communities	201-1						
	203-1, 203-2						
	207-1, 207-2, 207-3						
Contribution to the development of national industry through import substitution	–						
Emissions	305-7						
Innovation projects pursuing sustainable development goals	–						
Waste management	306-1-306-5						
Climate change	201-2						
	302-1, 302-3, 302-4						
	305-1–305-5						
Health and safety	403-1-403-5, 403-8-403-10						
Biodiversity	304-1-304-4						
Water consumption and wastewater discharge	303-1-303-5						
Information security	–						

² Excluding Foreign Business Units.

Material topics	GRI disclosures	Polar Division ¹	Trans-Baikal Division	Energy Division	Sales Division ¹	Head Office	Other Group enterprises
Industrial environmental safety of production facilities (including tailings storage facilities)	–	⊙	⊙	⊙	⊙	⊙	⊙
Responsible exploration and land rehabilitation	–	⊙	⊙	⊙	⊙	⊙	⊙
Impact of transport on water bodies	–	⊙	⊙	⊙	⊙	⊙	⊙
Responsible supply chain	308-1, 308-2, 414-1, 414-2	⊙	⊙	⊙	⊙	⊙	⊙
Corporate governance and risk management	2-9-2-20	⊙	⊙	⊙	⊙	⊙	⊙
Anti-corruption and business ethics	205-1, 205-2, 205-3	⊙	⊙	⊙	⊙	⊙	⊙
Respect for human rights (including those of indigenous small-numbered peoples)	401-3	⊙	⊙	⊙	⊙	⊙	⊙
	402-1	⊙	⊙	⊙	⊙	⊙	⊙
	405-1	⊙	⊙	⊙	⊙	⊙	⊙
	406-1	⊙	⊙	⊙	⊙	⊙	⊙
	407-1	⊙	⊙	⊙	⊙	⊙	⊙
	408-1	⊙	⊙	⊙	⊙	⊙	⊙
	409-1	⊙	⊙	⊙	⊙	⊙	⊙
	410-1	⊙	⊙	⊙	⊙	⊙	⊙
	411-1	⊙	⊙	⊙	⊙	⊙	⊙
	413-2	⊙	⊙	⊙	⊙	⊙	⊙



¹ Excluding Foreign Business Units.

Determining material topics

(GRI 3-1, 3-2)

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

Stage 1. Identifying impacts

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

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

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

Stage 2. Assessing impacts

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

or

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

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

Likelihood/frequency of impact

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

Scale (scope) of impact

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

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

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

² Impact is defined as the effect that the Nornickel Group has or may have on the economy, environment, or people, including on human rights.
³ Including core activities, business relationships, and sustainability context.
⁴ 29% external stakeholders, 71% internal stakeholders.