

# Incorporating stakeholder recommendations

Nornickel has a decades-long track record of stable operations, contributing to the country's development, global progress, and the advancement of the green economy. Sustainability principles are deeply embedded in Nornickel's corporate values and traditions, emphasising robust management, employee safety, labour rights, and environmental protection. Nornickel remains

committed to these principles, continually seeking effective solutions for long-term development despite external challenges. A key element of this process is maintaining open and regular stakeholder dialogue, which helps shape a sustainable future for both the Company and its regions of operation.

## Towards A Sustainable Future – 90th Anniversary of Nornickel: stakeholder dialogue minutes

Date and time: 29 January 2025, 10:00–12:00 am

Format: live-streamed in-person meeting<sup>1</sup>

Key target audience: Company managers and employees, regional and municipal authorities, local communities, non-profit organisations, investors, the business community, research firms and rating agencies, and sustainability experts

Event purposes:

- Sharing the results of the stakeholder survey conducted as part of assessing impacts and determining material topics
- Discussing the Company's key strategic initiatives with a wide range of participants, including the HR and social policy, environmental and occupational health management, and information security within the sustainability agenda
- Holding joint discussions with event participants, gathering suggestions and feedback from stakeholders on the Company's activities in line with the identified material topics, as well as on the disclosure of information in the 2024 Report

## Programme

**Item No. 1.** Results of Stakeholder Survey

**Item No. 2.** Environmental Management: Sulphur Project and Launch of Environmental Monitoring

**Item No. 3.** Information Security: A Contributor to the ESG Agenda

**Item No. 4.** Implementation of the Social Policy: Creating Comfortable Conditions for Employees and Local Residents Across the Company's Footprint

### Item No. 1. Results of Stakeholder Survey

Speaker:

**Inessa Chernova**  
Head of Sustainability Reporting, Sustainable Development  
Department at MMC Norilsk Nickel

Inessa Chernova presented the updated 2024 materiality assessment procedure, which included an expanded list of impacts for assessment. Respondents were given the option to either confirm the relevance of last year's averaged assessments across key GRI parameters or adjust them. The number of questions was also increased, partly as a forward-looking measure to ensure alignment with ISSB requirements (IFRS S1/S2).

According to the survey results, Nornickel's HR and social policies lead the ranking of material topics, environmental topics dominate in number, and a new material topic – Information Security – was identified.

Inessa Chernova also highlighted that the cross-cutting theme of the 2024 Report will be Well-Being for Future Generations in the Context of the National Agenda. The Company carries out a broad array of programmes and initiatives that play a significant role in advancing national goals and projects. Disclosures will continue in line with GRI Standards, SASB Metals & Mining, and UNCTAD, while GRI 14, TNFD, and IFRS S2 standards are currently applied on a pilot basis. Dedicated reports (human rights, climate change, and responsible supply chain) are planned for release.

### Item No. 2. Environmental Management: Sulphur Project and Launch of Environmental Monitoring

Speaker:

**Stanislav Seleznev**  
Vice President for Ecology and Industrial Safety at MMC Norilsk Nickel

Stanislav Seleznev presented the key results of the Company's environmental initiatives, highlighting the fulfilment of commitments under the Clean Air national project and plans to double sulphur dioxide recovery. In the reporting year, the first Arctic air quality monitoring system, featuring 16 emissions control stations, was launched for Norilsk residents, with AI-powered emissions forecasting.

The speaker noted that the Company executed the largest carbon unit purchase transaction in Russia and registered the first 16 thousand carbon units from the climate project at the Kola

site. In 2024, a project was also launched to build a solar power plant in the Trans-Baikal Territory. Biodiversity conservation efforts are consistently implemented, including support for nature reserves, the use of drones for wildlife population monitoring, and the ongoing development of methodologies for assessing ecosystem health.

In 2024, safety was formally established as one of the Company's core values, and a new approach to accident recording was introduced, resulting in a reduced accident rate. The Company is also reforming its health and safety system by replacing lengthy instructions with concise, clear procedure rules.

Stanislav Seleznev emphasised that the Company remains committed to reducing its environmental footprint, enhancing data transparency, and adopting advanced sustainability technologies.

<sup>1</sup> A record of the event is available at: <https://rutube.ru/video/e6167644fe943f9afa7c4a28a12216b/>.

### Item No. 3. Information Security: A Contributor to the ESG Agenda

#### Speaker:

**Alexey Martyntsev**  
Director of the Information Protection and IT Infrastructure  
Department at MMC Norilsk Nickel

Alexey Martyntsev emphasised that digital transformation is impossible without robust data protection, and automated production processes demand heightened vigilance against cyber threats. At Nornickel, the primary focus of protection is on critical facilities, where potential cyber attacks could impact production, the environment, and employee safety. In recent years, the Company has prioritised securing automated process control systems, driven in part by the need for import substitution. In several segments, no Russian equivalents exist, prompting

the Company to establish partnerships with key industry players, exchange expertise, and support the development of the information security market.

The Company participates in shaping legislative initiatives as a member of working groups across various agencies. The Club of Information Security in Industry was founded eight years ago, bringing together major companies to coordinate data protection efforts. In 2024, the platform served as the foundation for developing a Code of Ethics for the Information Security Market – a pioneering initiative in Russia. The emergence of cyber culture as a new trend in Russia was highlighted separately. The Company provides cyber security training for employees and their families, actively collaborates with universities, and promotes information security at the level of government agencies.

### Item No. 4. Implementation of the Social Policy: Creating Comfortable Conditions for Employees and Local Residents Across the Company’s Footprint

#### Speaker:

**Larisa Zelkova**  
Senior Vice President for HR, Social Policy, and Public Relations  
at MMC Norilsk Nickel

Larisa Zelkova highlighted that Nornickel places special emphasis on the well-being of its employees and local residents, developing social programmes aimed at enhancing quality of life, ensuring comfortable working conditions, and supporting professional growth. The Company is actively pursuing educational initiatives and expanding its in-house corporate Nornickel Academy. A modern approach to training fosters new practices and motivates employees.

Discussing motivation and remuneration, Larisa Zelkova highlighted that the Company offers competitive employment conditions and actively attracts young talent. As part of these efforts, the In Good Company programme is being developed, providing internships, career opportunities, and support for both professional and personal growth. On top of this, the Company continues to upgrade its facility infrastructure, including through the Made with Care programme, which aims to enhance employees’ workplace amenities. In 2024, a 10% pay rise was implemented, corporate healthcare options were expanded, and the health resort programme was enhanced.

The Company is also actively involved in renovating cities across its footprint. In 2023, the first new residential buildings in Norilsk in 40 years were commissioned, with additional projects scheduled for launch in 2025. Furthermore, the Digital Investor programme is ongoing, allowing employees to receive digital assets pegged to the value of Company shares.

In conclusion, Larisa Zelkova emphasised that the Company aims not only to maintain high positions in ratings but also to systematically improve social standards and quality of life across its regions of operation.

The speakers’ reports were followed by an open discussion where stakeholders could ask questions, provide comments, and make suggestions. Additional discussions focused on employee recruitment across Group enterprises amid staff shortages, potential funding through social impact bonds, the application of innovative technologies across operations, fostering a cyber security culture, adapting to climate change, collaborating with contractors on health and safety, and aligning corporate initiatives with national goals.

#### List of stakeholder recommendations

Recommendations/topics for disclosure	Company response
<b>From external stakeholders</b>	
Provide more details on engagement with small and medium-sized enterprises across Russian regions	Done. Disclosed in the <a href="#">Contribution to the Development of Local Communities</a> section
Describe the contribution to biodiversity conservation (restoration/study) and environmental protection	Done. Disclosed in the <a href="#">Biodiversity</a> section
Provide an update on the Company’s sustainability governance structure	Done. Disclosed in the <a href="#">Sustainability Management</a> section
Discuss the Company’s shift to recycled materials in product manufacturing	To be done in the upcoming reporting cycles
Disclose the quantitative results of charitable initiatives	To be done in the upcoming reporting cycles
Disclose the amount of funds allocated to endowments	Partially done. Disclosed in the <a href="#">Improving the Well-Being of Local Communities</a> section
Enhance information on safety culture	Done. Disclosed in the <a href="#">Control of Compliance with H&amp;S Requirements and Prevention of Violations</a> section
Disclose information on the Company’s activities within the framework of the seven national goals	Done. Disclosed in the Report and in the <a href="#">Nornickel’s Contribution to the UN SDGs and Alignment with the National Strategic Priorities</a> section
Report on initiatives to promote leadership development and/or employee career management, with a focus on young talent	Done. Disclosed in the <a href="#">Training Ecosystem</a> section
Describe anti-corruption initiatives involving employees	Done. Disclosed in the <a href="#">Business Ethics and Anti-Corruption</a> section
Disclose support measures for pregnant employees, mothers with young children, and large families	Done. Disclosed in the <a href="#">Social Support for Employees and Their Families</a> section
<b>From internal stakeholders</b>	
Specify benchmarks for each sustainability aspect, strategic goal, and metric	Done. Disclosed in the <a href="#">Sustainable Growth Strategy</a> section
Disclose details on climate project implementation, climate risk management, and the development of a permafrost monitoring system	Done. Disclosed in the <a href="#">Climate Change</a> section and in <a href="#">Nornickel’s 2024 Climate Change Report</a>
Provide more details on the creation of jobs across Russian regions	Done. Disclosed in <a href="#">Nornickel’s HR Strategy</a> , <a href="#">Social Support for Employees and Their Families</a> , and <a href="#">Contribution to the Development of Local Communities</a> sections
Disclose information on the development of in-house production and the use of innovative exploration solutions	Disclosed in <a href="#">Nornickel’s 2024 Annual Report</a>
Disclose information on reforestation efforts and soil replacement with fertile soil	Partially done. Disclosed in the <a href="#">Soil Protection and Responsible Mining</a> section
Describe the impact on quality of life of local communities	Done. Disclosed in the <a href="#">Improving the Well-Being of Local Communities</a> and <a href="#">Contribution to the Development of Local Communities</a> sections