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# Contribution to the development of local communities

## The Group's key regions of operation in Russia







Monchegorsk



Pechenasky Municipal District, Murmansk Region District, Trans-Baikal (Zapolyarny)



Gazimuro-Zavodsky Territory

Cooperation with the authorities and civil society to ensure sustainable development and social stability in its regions of operation is a priority noncore activity for Nornickel. To this end, the Company joins efforts with its stakeholders to address economic, social, and environmental matters. The Company fosters a favourable environment for regional development by implementing impactful infrastructure projects, makes a systemic contribution to socio-economic progress, and helps improve living standards and promote a culture of giving.

The Company's 2030 Socially Sustainable Development Strategy sets out its goals, KPIs, and relevant measures aimed at securing leadership in shaping the industry's social agenda and delivering a new quality of life for local communities and indigenous peoples.

#### Key focus areas for local community development

Contribution to economic development

- Budget payments
- · Supporting local employment
- Promoting stronger cooperation
- Operation of essential service providers within the Group (energy, transport)

Improving living standards in local communities

Infrastructure

development

- Systematic implementation of charitable programmes
- · Promotion of sports and culture
- Employee volunteering

• Support for vocational education institutions

- Housing construction
- Area improvements
- Bridge and road reconstruction
- · Construction and redevelopment of educational, healthcare, sports, cultural, and entertainment facilities
- Rollout of high-speed internet access in Norilsk
- Utility service efficiency improvements (Smart City initiative)

Breakdown of social, infrastructure, and sponsorship expenses and staff costs by accruals and payments (RUB bn)

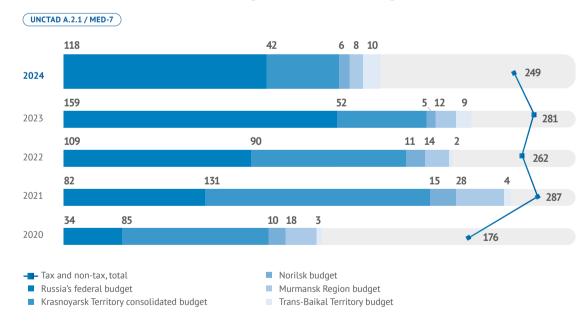
GRI 2-4

Year/ Category	By accruals				By payments							
	Charity¹	Social programmes and benefits for employees²	Sponsorship³	Total	Payments under social investments and programmes <sup>4,5</sup> (GRI 203-1)	Financing of subsidiary sports clubs	Charitable capital investments <sup>6</sup> GRI 203-1	Capital investments in infrastructure <sup>7</sup> GRI 203-1	Charity GRI 203-1	Total		
2021	25.6	15.8	2.1	43.5	5.8	2.3	0.6	2.0	25.2	35.9		
2022	21.4	15.6	1.8	38.8	7.5	2.2	2.4	1.0	21.7	34.8		
2023	13.3	16.4	0.8	30.5	9.3	2.1	5.5	0.0	12.8	29.7		
2024	14.0	16.5	0.5	30.9	9.0	2.4	2.1	0.1	14.0	27.6		

## Social and economic development of local communities

## **Budget payments**

Tax and non-tax payments to local, regional, and federal budgets (RUB bn)



- 1 Including COVID-19 response costs: 2021 RUB 2.2 billion, 2022 RUB 1.2 billion, 2023 RUB 0.1 billion, 2024 RUB 0.2 billion.
- <sup>2</sup> Including COVID-19 response costs (employees): 2021 RUB 2.6 billion, 2022 RUB 0.3 billion.
- <sup>3</sup> Listed as "Sponsorship (sports and social projects)" in Nornickel's 2023 Sustainability Report.
- <sup>4</sup> Listed as "Social investments and programmes, including investments in social infrastructure facilities" in Nornickel's 2023 Sustainability Report
- 5 In 2024, the Company's social spending amounted to RUB 12.0 billion (according to the consolidated financial statements), with charity expenses of RUB 14.0 billion and accruals and changes in estimates of liabilities under long-term agreements (social programmes) of RUB 4.2 billion (revenue).
- 6 Reported under "Capital expenditures on infrastructure improvements" in Nornickel's 2023 Sustainability Report. In 2024, the indicator was expanded to include capital investments in tourism and urban infrastructure.
- 7 Reported under "Capital expenditures on infrastructure improvements" in Nornickel's 2023 Sustainability Report

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The changes in the amounts of tax and non-tax payments in 2024 were due to lower revenue, resulting from a decline in average annual prices for nickel (-22%), palladium (-26%), and rhodium (-25%).

Tax revenues in the Company's regions of operation were largely affected by the application of the Russian Ministry of Finance's methodology for allocating income tax from former members of the consolidated taxpayer group (CTG) among the regions. Under this methodology, 60% of income tax payments by former CTG members in 2024 were pooled into a common "basket" and subsequently distributed across regions in proportion to the historical share of payments made by regional CTGs. Given Nornickel's large share of total CTG contributions in prior years, income tax payments from former CTG members increased in 2024.

Nornickel paid 97% of its prescribed allocation from the federal basket to the Krasnoyarsk Territory (10.4% out of 10.75%), 2.5% out of 3.03% to the Murmansk Region, and 0.2% out of 0.39% to the Trans-Baikal Territory.

## Supporting local employment

GRI 203-2

GRI 14.9.4

The Company supports employment in the regions where it operates by establishing in-house recruitment centres - four such centres continued operations in 2024. In addition, the Company maintains open dialogue with institutions of higher, vocational, and additional education. This cooperation enables students to take internships with their future employer and align theoretical knowledge with practical experience. Nornickel also purchases educational literature and specialised equipment and contributes to the renovation of educational institution buildings and the construction of educational campuses in Norilsk and Chita. Nornickel managers actively engage with students, including through teaching at educational institutions. Nornickel also provides support to educational institutions in the Monchegorsk cluster.

The Company's regions of operation have consistently demonstrated low unemployment rates, with 2024 showing either a decrease or no change from the previous year. The registered unemployment rate across Russia stood at 0.4% as of the end of December 2024, which is in line with the unemployment levels observed in the Company's regions of operation<sup>1</sup>.

### Registered unemployment in key regions of operation<sup>2</sup> (%)

Region of operation	2020	2021	2022	2023	2024	Change 2024/2023	
Norilsk	1.4	0.3	0.2	0.2	0.2	$\rightarrow$	
Taimyrsky Dolgano-Nenetsky Municipal District	1.2	0.7	0.5	0.5	0.4	<u> </u>	
Krasnoyarsk Territory	3.5	0.8	0.8	0.7	0.6	<u> </u>	
Monchegorsk	2.2	1.7	1.2	0.6	0.4	<b>①</b>	
Zapolyarny	1.9	1.6	0.8	0.5	0.3	<b>①</b>	
Nikel	3.0	2.2	1.4	0.7	0.7	$\overline{\hspace{1cm}}$	
Murmansk Region	2.7	1.4	0.8	0.6	0.4	<u> </u>	
Trans-Baikal Territory	5.3	1.5	1.1	0.8	0.5	<b>(1)</b>	

Source: UIISS.



## Supporting local suppliers

GRI 203-2 GRI 14.9.4

To strengthen local economies across its footprint and optimise supply chains, Nornickel is building partnerships with local enterprises in its regions of operation through long-term contracting. Company representatives maintain a regular cadence of meetings with local commercial organisations to update them on Nornickel's activities, upcoming procurement plans, and terms

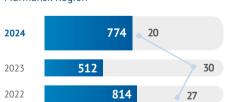
of cooperation. In addition, Nornickel provides training for local suppliers on how to participate in tenders, register on the tender platform, and access information on ongoing procurement processes.

In 2024, the Company continued to implement its import substitution policy, focusing on sourcing products and services from Russian, and primarily local, suppliers. The share of procurement tenders for goods and services won by regional suppliers ranged from 17% to 46%.

### Statistics on procurement tenders for goods and services











<sup>2</sup> At the end of the reporting year. Sources: interactive portal of the Krasnoyarsk Territory Employment and Occupation Agency, interactive portal of the Murmansk Region Public Employment Service, the Ministry of Labour and Social Protection of the Trans-Baikal Territory.

<sup>■</sup> Number of procurement tenders for goods and services held by the Company

<sup>---</sup> Share of Company tenders awarded to regional suppliers (%)

<sup>3</sup> In 2024, the Company adjusted its methodology for calculating these indicators. Comparable data for 2022–2023 have been restated accordingly.



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### The Group's spending on local suppliers (RUB bn)

Indicators			2022			2023			2024
	Krasnoyarsk Territory	Murmansk Region	Trans-Baikal Territory	Krasnoyarsk Territory	Murmansk Region	Trans-Baikal Territory	Krasnoyarsk Territory	Murmansk Region	Trans-Baikal Territory
The Group's spending on local suppliers, including:	51.5	5.0	1.5	63.0	3.5	1.7	55.4	3.8	1.5
works and services	38.7	4.8	1.1	52.3	3.3	1.3	49.5	3.4	1.4
• materials	11.9	0.2	0.4	9.8	0.2	0.4	4.7	0.4	0.08
food supplies	0.9	_	_	0.9	_	0.001	1.1	_	0.003

In 2024, Nornickel enterprises in the regions of operation spent RUB 62.4 billion on procurement, down 8.5% y-o-y. This change in the spending trend was due to the completion of the first stage of the Sulphur Project.

## Support for small and medium-sized enterprises (SME)

The Company engages with SMEs through both procurement processes and charitable programmes.

Its transparent procurement procedure in place ensures equal opportunities for both large enterprises and SME suppliers.

SMEs participate in procurement as equal market participants, and the volume of procurement from them continues to grow annually. For example, in the Polar Division, spending on local suppliers has surged over the past five years, rising from RUB 465 million in 2020 to RUB 8,273 million in 2024.

Since 2022, Nornickel and its partners have been running the GR Accelerator programme in the Company's regions of operation. For three years, the accelerator programmes have been bringing together municipal officials, business

community, non-profit organisations, engaged citizens, and Company employees to work on infrastructure and investment projects.

In 2023-2024, the accelerator focused on implementing a municipal investment standard.

The programme results were highly praised by experts during the demo day. The Russian Ministry of Economic Development has recognised GR Accelerator practices as a benchmark for municipal support of investment projects.

The accelerator programme's goal for 2024–2025 is to update the investment profiles of municipalities, improve the performance of investment commissioners in its regions of operation, and pilot support for new investment projects under updated profiles.

## Nornickel's contribution to the Efficient and Competitive Economy national project

### Relevant **UN SDGs**



### Related federal projects

Small and Medium-Sized Businesses and Support of Individual Entrepreneurial Initiatives

#### Key initiatives and focus areas

Integration of local businesses into the Group's production chain

Programme to promote the social and economic development of Taimyr

GR Accelerator programme

World of New Opportunities charitable programme

## Improving transport connectivity for remote locations

Nornickel's reliable transport infrastructure provides the business with raw and other materials, enables the timely delivery of finished products to customers, and serves as a foundation for the stable operation of Group enterprises and the well-being of local communities across its footprint.

### Transport and logistics assets



Ice-class Arctic fleet (five dry cargo vessels, one tanker, and one seaclass diesel port icebreaker)



River fleet (619 vessels, including 381 vessels forming the fleet's active core)



Rail fleet (142 container flatcars, two roadrail vehicles, and one shunting tractor)



Port infrastructure (transshipment of all types of cargo)



Aircraft fleet (18 Mi-8T aircraft operated by a Group entity)

- Delivery of socially significant cargoes to hard-to-reach areas of the Krasnoyarsk Territory (fuels and lubricants, food, and other essential
- · Transport services for residents of hard-to-reach riverside settlements in the lower reaches of the Yenisei River
- Cargo handling at the ports of Dudinka, Murmansk, Lesosibirsk, and Krasnoyarsk
- Emergency response on the inland waterways of the Yenisei basin
- · Export of gas condensate from the port of Dudinka (a by-product of gas extraction at the Pelyatkinskoye field)
- Year-round flights between the Norilsk Industrial District and other regions of Russia
- · Air services, including emergency medical flights and search and rescue operations within a 280 km radius of Norilsk Airport

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## 3.6 mln t

cargo traffic at the Dudinka port in 2024

# •9 thousand flight hours

total time flown by the aircraft operated by Group providers of air services in 2024

Maritime shipping is a highly regulated and strictly controlled industry. The Company's vessels are intended for dry and liquid cargo transportation, with Nornickel ensuring compliance with all environmental safety requirements in this area.

> For more details on the Group's transport and logistics assets, please see Nornickel's 2023 Sustainability Report.

volume of cargo transported by Group enterprises along the Podkamennaya Tunguska and Nizhnyaya Tunguska Rivers and other waterways within the Yenisei basin in 2024

## 1.88 mln t

sea cargo transported by Group enterprises (including third-party vessels) in the lower reaches of the Yenisei River in 2024 (including 1.6 mln t of dry cargo and 0.28 mln t of liquid cargo on completed voyages)

thousand people passenger traffic at Norilsk Airport in 2024

## Nornickel's contribution to the Stable and **Dynamic Economy national goal**

## Targets and objectives:

u) Increase the volume of international traffic by at least 1.5x from the 2021 level by 2030 [...]

## Nornickel's performance highlights and plans

Nornickel plans to increase cargo traffic along the Northern Sea Route from 1.6 mtpa to 3 mtpa by 2028–2030



## Nornickel's contribution to the Efficient **Transport System national project**

### Relevant **UN SDGs**



## Related federal projects

Development of the Great Northern Sea Route

Development of a Backbone Network of Seaports

Development of a Backbone Network of Inland Waterways

Development of a Backbone Network of Airfields

Development of a Backbone Railway Network

### Key initiatives and focus areas

Provision of year-round cargo shipping services between seaports as well as cargo transport and handling in the Arctic region

Operation and maintenance of rail infrastructure; improving transport connectivity for remote locations

Support for the development of passenger services in the Company's regions of operation

## **Developing local social infrastructure**

GRI 203-1 GRI 14.9.3

An accessible and comfortable urban environment for working and living in the regions of operation is one of Nornickel's top priorities. In partnership with public authorities, the Company contributes to addressing a wide range of social and economic development objectives in Norilsk, Dudinka, Monchegorsk, and Zapolyarny.

When selecting social programmes or projects, Nornickel assesses their contribution to the social and economic development on both regional and local levels, as well as their relevance to addressing specific social issues. During the implementation phase, the effectiveness of initiatives is evaluated through continuous monitoring of any social changes that take place after the initiative's launch1; performance audits to check the alignment with goals and objectives, identify and correct any errors

in a timely manner, and verify the reliability of collected data; and progress reviews of projects and programmes.



Economic projects should create jobs, develop infrastructure, promote education, and provide modern living standards and new opportunities for local communities.

### **Andrey Grachev,**

Vice President for Federal and Regional Programmes

<sup>&</sup>lt;sup>1</sup> To support this process, a list of parameters, performance indicators, and data analysis tools are used.

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# Nornickel's contribution to the Comfortable and Safe Living Environment national goal

## Targets and objectives:

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- c) Renovate at least 20% of the housing stock by 2030 as compared to the 2019 level
- d) Achieve a sustainable reduction of unsafe housing stock
- f) Improve at least 30 thousand public spaces and implement no fewer than 1.6 thousand winning projects from the All-Russian Competition of the Best Urban Environment Projects in small towns and historical settlements by 2030
- h) Build and reconstruct (upgrade) at least 2 thousand drinking water supply and water treatment facilities by 2030

# Nornickel's performance highlights and plans

- Construction of new residential buildings in Norilsk by 2035
- Demolition of unsafe housing in Norilsk
- In 2021–2024, 1,086 families were provided with homes with financial support from the Company<sup>1</sup>
- Improvement of public spaces in Norilsk, Monchegorsk, and other cities hosting the Company's operations
- Design of a new water intake on the Norilskaya River

# Nornickel's contribution to the Infrastructure for Life national project

## Relevant UN SDGs







## Related federal projects

Housing

Creating a Comfortable Urban Environment

Infrastructure Development in Settlements

### Key initiatives and focus areas

Implementation of the housing programmes
Our Home / My Home and Your Home

For more details, please see the <u>Social</u>
Support for Employees and Their Families
section

Projects aimed at developing infrastructure in the regions of operation (including initiatives under the Comprehensive Plan for the Social and Economic Development of Norilsk and other local infrastructure projects)

Measures to improve reliability of the fibreoptic communication line in Norilsk

In 2024, Nornickel topped the Arctic development ranking of major companies operating in Arctic

For more details, please see the <u>Digital</u> Technology Development section

Projects to upgrade power and heat generation facilities, power grids, and heat networks

For more details, please see the Climate Change section

regions, which assesses their voluntary proactive contribution to the sustainable development of these regions. Nornickel was ranked in the Highest Level of Responsibility category with 41 points (the average score in the 2024 ranking was 22 points).

<sup>1</sup> Social payments were provided to citizens relocating from the Far North to help them purchase residential property.

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### Krasnoyarsk Territory

(Krasnovarsk, Norilsk, Taimyrsky Dolgano-Nenetsky Municipal District)

**2,366.8** thousand sq km

13.9% of Russia's total territory<sup>1</sup>

**Population** 

2,847,826 people

Nornickel's performance highlights in the Krasnoyarsk Territory:

- Workforce: 56.0 thousand employees<sup>2</sup>
- Average monthly salary: RUB 200.6 thousand
- Spending on social programmes for employees: RUB 4.0 billion

## Murmansk region

(Monchegorsk, Pechengsky Municipal District)

144.9 thousand so km

0.85% of Russia's total territory<sup>3</sup>

**Population** 

**657,085** people

Nornickel's performance highlights in the Murmansk Region:

- Workforce: 11.6 thousand employees
- Average monthly salary: RUB 142.0 thousand
- Spending on social programmes for employees: RUB 1.0 billion

### Trans-Baikal Territory

(Chita, Gazimuro-Zavodsky District)

431.5 thousand sq km

**Population** 

984,340 people

Nornickel's performance highlights in the Trans-Baikal Territory:

- Workforce: 3.1 thousand employees
- Average monthly salary: RUB 180.4 thousand
- Spending on social programmes for employees: RUB 84 million

## <sup>1</sup> Krasnoyarsk Territory Today: http://www.krskstate.ru/about.

- <sup>2</sup> Krasnoyarsk Territory and Norilsk Industrial District.
- <sup>3</sup> General information about the Murmansk Region: https://eng.gov-murman.ru/about\_region/general\_information/.
- 4 General information about the Trans-Baikal Territory: https://75.ru/o-krae/10054-obschaya-informaciya.

## **Krasnoyarsk Territory**

**RUB** 

billion

total funding by Nornickel for the Norilsk Renovation Plan until 2035

# **RUB** billion

funding of activities under the Norilsk Renovation Plan by Nornickel in 2021–2024

**RUB** 

the Company's expenditure on activities under the Norilsk Renovation Plan in 2024

## Norilsk and the Taimyrsky Dolgano-Nenetsky **Municipal District**

As part of efforts to create and enhance an accessible and comfortable urban environment for working and living in Norilsk, the Company continued to implement the Comprehensive Plan for the Social and Economic Development of Norilsk (the "Norilsk Renovation Plan" or the "Plan") in 2024. The list of completed projects includes

the renovation of the comprehensive social service centre, construction of a fire station in Oganer. upgrade of a preschool for 236 children, demolition of unsafe housing, and provision of social payments to citizens relocating from the Far North to purchase residential property. Other initiatives under the Plan remain in progress.

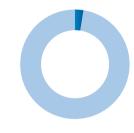
## Activities under the Norilsk Renovation Plan in 2024

Development of design and costestimate documents for the construction of a new water intake on the Norilskaya River

Construction of two multistorey residential buildings (184 flats) in the Central **District of Norilsk** 

Construction of two mid-rise residential buildings (115 flats) in the Central **District of Norilsk** 

Design of multistorey residential buildings in Oganer



**RUB** 

**RUB** 

**RUB** 

**RUB** in 2024

**RUB** billion billion

**RUB RUB** 1.9 billion

**RUB RUB** 905 million 1.0 billion Nornickel's investment

1.8 billion

**RUB** 

35 billion

**RUB** million

Current funding

**RUB** 16 million Nornickel's investment in 2024

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Design of a general education school for a thousand students with an indoor sports facility in Norilsk



Total planned funding

Current funding

Construction of an outpatient clinic with a capacity of a thousand visits per shift

Design and overhaul of utility



RUB 2.06 billion

Total planned funding

**RUB 397.5** million Current funding

Nornickel's investment in 2024

Total planned funding

Current funding

Alongside the Norilsk Renovation Plan, Nornickel is also funding additional initiatives identified through a resident survey in Norilsk. In 2024. Nornickel continued redeveloping a building to house the Tower, an all-season public space, and renovating Fedorovsky Polar State University.

In addition, in 2021–2024, the Company financed various activities of the Norilsk City Administration in response to specific requests. It also supported urban clean-up initiatives, including the demolition of unsafe buildings and the removal of pile caps left over from previous years.

## Krasnoyarsk

## **Bobrovy Log Fun Park**

In 2024, Nornickel continued supporting the Snow Class, a large-scale social project for school students in grades 2–8 to train them in winter sports. Students are transported to the slope, provided with equipment, given a snack, and brought back afterwards. About 800 students have already participated in the project (almost twice as many as in the prior year). In 2024, they learned the basics of alpine skiing, and in early 2025 began practising snowboarding. The classes are given by professional instructors on a dedicated, safe learning slope equipped with conveyor belts.

Also in 2024, Bobrovy Log hosted the second youth forum on financial literacy, Healthy Finance in Bobrovy Log: Invest Smartly. Along with the basics of investing, financial market experts and investment analysts spoke about digital financial assets, their technologies and potential, and also paid special attention to cybersecurity. With about 200 students attending the event, the speaker presentations were also livestreamed to a broader audience, attracting approximately 5 thousand online viewers.

## **Murmansk Region**

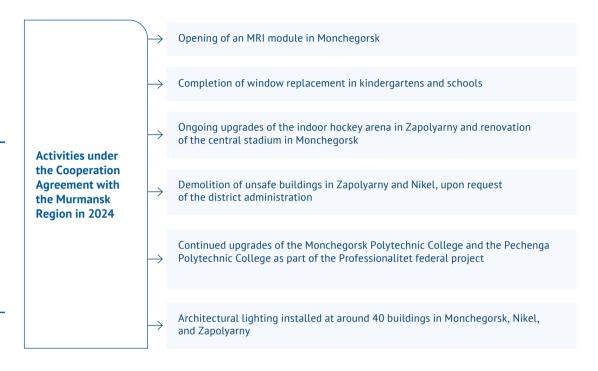
**RUB** 

total funding by Nornickel under the Cooperation Agreement between the Government of the Murmansk Region and MMC Norilsk Nickel (out of the total RUB 10 billion, with RUB 3.8 billion funded from the public budget)

**RUB** 

the Company's spending on activities under the Cooperation Agreement with the Murmansk Region in 2023-2024 (including RUB 1.6 billion in 2024)

In 2023, the Government of the Murmansk Region and Nornickel signed a Cooperation Agreement envisaging a set of measures to improve the quality of life in Monchegorsk and the Pechengsky Municipal District in 2023-2025.



## **Trans-Baikal Territory**

**RUB** 

spending on public-private and municipal-private partnership projects and programmes in the Trans-Baikal Territory in 2024

In 2024, Nornickel and the Trans-Baikal Territory signed an additional Cooperation Agreement, providing for a long-term (until 2029) partnership between the Company and the region. Nornickel will allocate RUB 2.95 billion to support socialimpact activities implemented by the Government of the Trans-Baikal Territory and regional authorities, including:

- cultural, sports, and social projects
- youth hockey promotion
- improvement of public spaces

volunteering and patriotic education

 projects to develop the Gazimuro-Zavodsky Municipal District.

In addition, the Company plans to contribute RUB 800 million towards the construction of the Transbaikal State University campus, subject to co-financing by the government and other investors.

In 2024, the Trans-Baikal Division:

- jointly with the Trans-Baikal Development Fund, continued the project to preserve the Church of the Dormition of the Blessed Virgin Mary in the village of Kalinino, Nerchinsky District
- continued building the School University Bystra ecosystem of continuous development for young talent. A total of 17.9 thousand young people took part in related events, including the Mining Classes, Sirius. Summer, Nornickel's City of Occupations, and Bystrinsky GOK's Generation FAST projects.

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## Other Russian regions



### Zavidovo

Nornickel runs corporate housing programmes in the Konakovsky District of the Tver Region, an area with strong social and economic potential and scenic natural beauty. Over the past 10 years. Nornickel has supported a range of development projects in Zavidovo, such as modern residential quarters with kindergartens, a polyclinic, a forest park, grocery supermarkets, and a modern leisure centre with a cinema and a Multifunctional Public Service Centre – effectively creating the necessary infrastructure for employees to enjoy a comfortable life after retiring from the Company. Flats in Zavidovo are distributed under a housing programme that covers several dozen Group entities. To date, around 3 thousand employees have received housing in Zavidovo under this programme. Nornickel prioritises the development of social infrastructure in the Zavidovo area to improve the quality of life for residents.

### Nornickel-sponsored social-impact projects in the Konakovsky District, Tver Region

A school renovation project, including furniture and equipment purchases, participation in the construction of school buildings installation of utility systems, and improvements of the surrounding area

Construction and equipping of a healthcare unit

Participation in the construction of a polyclinic, installation of utility systems, and procurement of essential equipment and machinery

Design and survey works for a planned fitness and health

Purchase of a CT scanner for a specialised medical centre

## Nashe Zavidovo **Endowment Fund**

The Development endowment was established to use income from the placement of its capital to support non-profit organisations, including non-governmental organisations and public and municipal budgetary institutions (excluding state corporations, political parties, and social movements), active in the Tver Region in the areas of education, science, healthcare, culture, physical culture and sports (excluding professional sports), arts, social assistance (support), and environmental protection.

endowment as at 2024

# **Engagement with indigenous** peoples

GRI 203-1, 411-1 / SASB EM-MM-210a.3, EM-MM-210b.1 / MED-40 / TNFD Gc GRI 14.9.3

the Company's spending on projects to support the indigenous smallnumbered peoples of the North in 2024

cases

of violations of indigenous rights in 2024

Nornickel acknowledges and respects both the collective and individual rights of the indigenous peoples as enshrined in Russian and international law<sup>1</sup>. The Company honours the history, traditions, and cultures of the Nenets, Enets, Dolgans, Nganasans, Evenks, and Sámi, respecting their distinctiveness, heritage, and the natural environment on which they depend. As part of its investment and operational activities, Nornickel engages in consultations and builds trusting, productive relationships with indigenous small-numbered peoples ("indigenous peoples" or "indigenous minorities").

In 2024. Nornickel's Board of Directors approved the updated Policy of Engagement with Indigenous Small-Numbered Peoples, which outlines the Company's principles and commitments to respecting the rights and taking into account the interests of indigenous peoples. Independent experts, family (tribal) communities, and associations of indigenous minorities participated in updating the document, enabling the comprehensive alignment with international standards, the Company's experience in implementing support projects and programmes for indigenous minorities, and the specific needs and suggestions of the indigenous peoples of Taimyr and the Murmansk Region.

Recognition of and respect for self-determined development priorities

Acknowledgement of the vulnerability of indigenous minorities

Recognition of and respect for decision-making rights Nornickel's commitments and principles regarding engagement with indigenous peoples

Commitment to culturally appropriate consultations. agreements, and disclosure of information

Advancing engagement with indigenous peoples

Funding of projects agreed with indigenous peoples

### New aspects introduced by the 2024 Policy of Engagement with Indigenous Small-Numbered Peoples

Formalised procedures for engagement with indigenous peoples in different situations

Due diligence process to monitor the risks of infringing on the rights of indigenous peoples

Application of the principle of free, prior, and informed consent (FPIC)

Establishment of an independent grievance mechanism<sup>2</sup>

Commitment to the principle of consultations in good faith

Independent audit of compliance with the policies, agreements, and programmes developed in collaboration with and for the benefit of indigenous peoples<sup>3</sup>

- <sup>1</sup> For the full list of regulations, please see the Policy of Engagement with Indigenous Small-Numbered Peoples.
- <sup>2</sup> For more details, please see Nornickel's 2024 Human Rights Report.
- <sup>3</sup> The audit includes assessment of stakeholder engagement outcomes in line with the IRMA Standard and the ICMM Principles.