

Environmental management



GRI 3-3 / SASB EM-MM-160a.1

Nornickel strives to mitigate and where possible prevent the negative environmental impact exerted by its production and supply operations.

Nornickel's senior management and Business Units are responsible for meeting the Company's environmental obligations, goals, and KPIs. The Company's units take steps to achieve the goals, comply with statutory requirements, and honour voluntary commitments in line with their competencies.

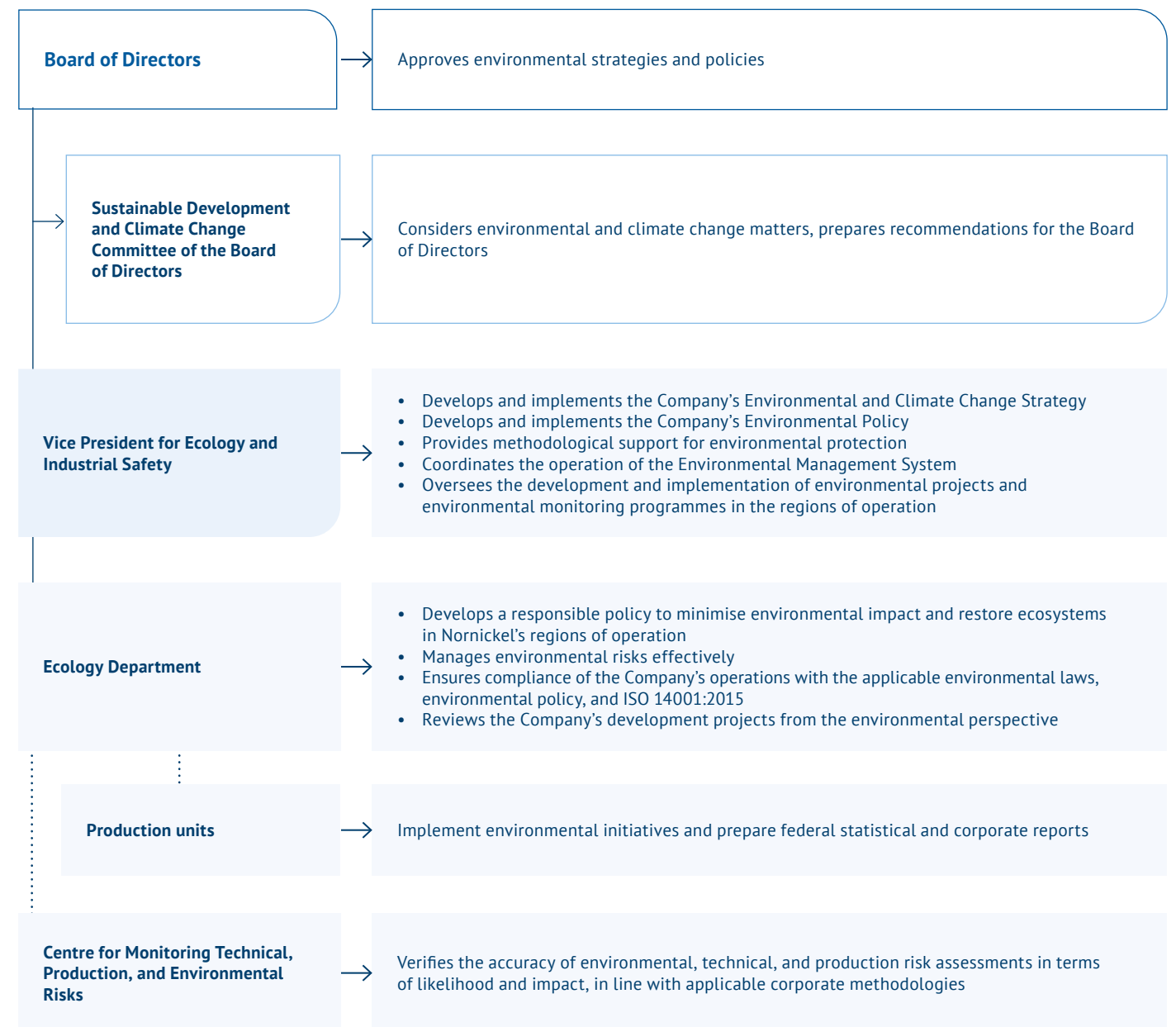


The Company's 2031 Environmental and Climate Change Strategy helps Nornickel effectively manage its environmental impact and monitor environmental conditions across its footprint. On top of this, Nornickel has in place dedicated environmental internal regulations drafted in accordance with Russian laws and best global practices.

For a list of key environmental internal regulations of the Company, please see [Nornickel's 2023 Sustainability Report](#).

When planning and conducting its operations, Nornickel complies with the applicable Russian environmental laws and regulations. During a state expert review, design documents and the results of engineering surveys for all ongoing projects undergo mandatory assessment for compliance with applicable laws.

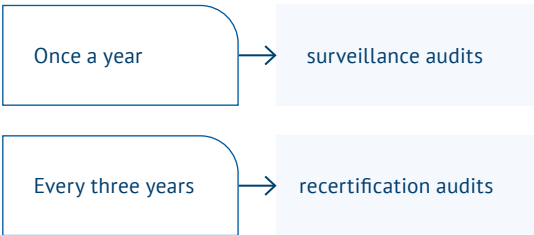
GRI 2-12, 2-13, 2-14 / TNFD Ga, Gb



Environmental management system

The Environmental Management System (the “System”) operates as part of the Corporate Integrated Quality and Environmental Management System, which enables the Company to harmonise relevant initiatives with operations of other functions (including production management, finance, overall safety). The resulting synergies translate into both better productivity in general and advances in environmental safety in particular.

The System is certified to ISO 14001:2015 (with the certificates available on the [Company website](#)). To confirm compliance, the Company and its Business Units pass surveillance and recertification audits.



In December 2024, the first surveillance audit of the seventh certification period was conducted by international certification auditors, establishing the Company’s full conformity with ISO 14001:2015. Nornickel has demonstrated effective maintenance and continuous improvement of its Corporate Integrated Management System.

In 2024, the systematic approach to environmental management ensured the sustained high level of performance and further enhancement across the following areas:

- The application of a risk-based process approach to environmental protection contributed to improved prevention and mitigation of the Company’s potential negative environmental impacts
- Environmental safety initiatives (including the Sulphur Project) were continued
- Specialised training sessions and briefings contributed to enhancing employees’ environmental awareness
- Compliance with international environmental standards contributed to enhancing the Company’s reputation, strengthening the trust of customers and other stakeholders, and improving Nornickel’s competitiveness both domestically and internationally

Precautionary principle

GRI 2-23

The Company analyses risks and assesses impacts by engaging qualified experts during the planning and implementation of each project. If the analysis identifies any material risks, mitigation initiatives are developed, and a decision may be taken to abandon the project. This procedure is aligned with MMC Norilsk Nickel’s Procedure Rules for Investment Project Risk Management.

In 2024, the Company implemented both day-to-day and major initiatives to minimise environmental risks, including follow-up on their performance. Nornickel continued to improve its tools used to assess the performance of its initiatives.

Environmental KPIs were used to better motivate employees and encourage a more responsible attitude towards mitigation initiatives.

Stakeholder engagement on environmental matters

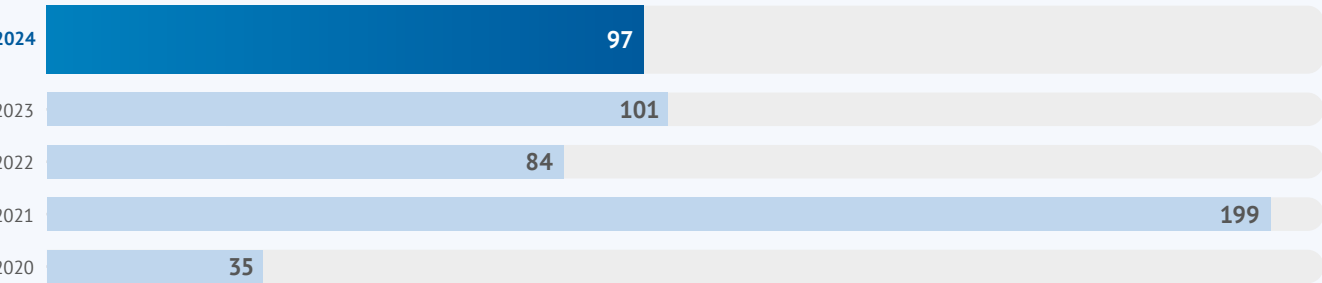
Reducing an environmental footprint is included in the agenda of internal and public events

for more details, please see the [Stakeholder Engagement](#) section

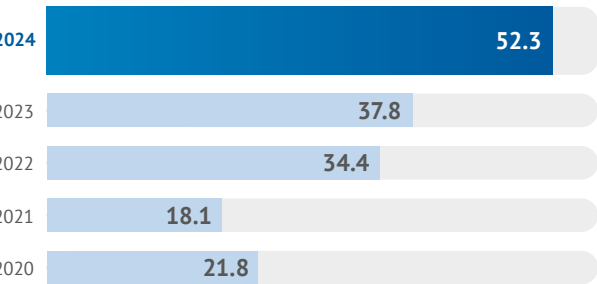
Environmental protection expenditures

MED-21 / TNFD A11.0, TNFD A16.0, TNFD 21.1

Environmental costs and expenditures (RUB bn)

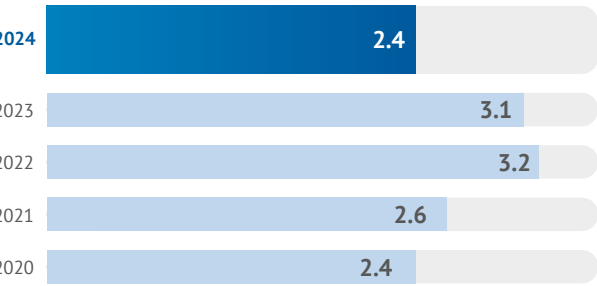


OPEX for environmental protection (RUB bn)



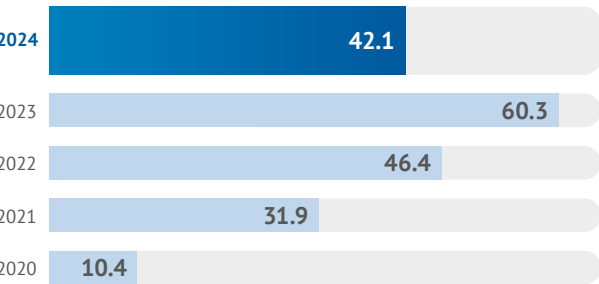
The 38.4% increase in OPEX for environmental protection in 2024 was due to the commissioning of new production infrastructure, higher tariffs, and increased prices.

Charges for permissible and excess emissions, effluents, and disposal of production and consumption waste (RUB bn)



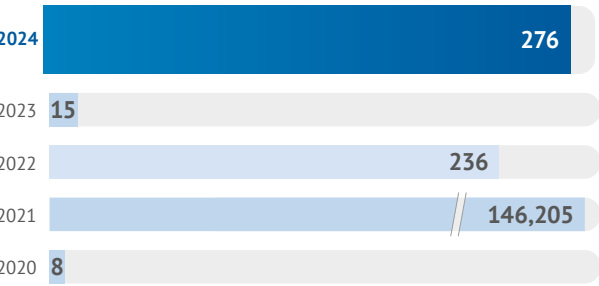
In 2024, charges for permissible and excess emissions (effluents) and disposal of production and consumption waste dropped almost 23% y-o-y.

Capital investments to ensure environmental protection and sustainable use of natural resources (RUB bn)



The decline in investments in 2024 resulted from the optimisation of investment activities and the reallocation of funds to subsequent years.

Charges paid by the Company to remedy damages arising from non-compliance with environmental laws (excluding environmental fines)¹ (RUB mln)



Charges paid by the Company in 2024 to remedy damage arising from non-compliance with environmental laws were largely related to compensation for soil disturbance caused by meltwater and stormwater from the section of Talnakh Concentrator’s tailings storage facility that is currently under construction.

¹ RUB 146 billion paid in 2021 to compensate for the environmental damage caused by the fuel spill at CHPP-3 in 2020.