

Assessment of tailings storage facility risks

There are two processes in place to assess the Company's tailing storage facility risks:

- Estimates of potential damage to life and health of individuals, and to property of individuals and legal entities as a result of an emergency at a hydraulic structure. The estimates of potential damage are prepared at least once every five years, when developing a safety declaration for the hydraulic structure
- Assessment of technical and production risks carried out in line with the Procedure for Managing Technical, Production, and Environmental Risks of MMC Norilsk Nickel and Russian business units of the Nornickel Group

The Company registers tailings storage facilities, determines the timeframes for their decommissioning, and estimates the future closure and land rehabilitation costs. The Company uses the resulting data to calculate the present (discounted) value of future costs, recognising its environmental provision with respect to the tailings storage facilities.

Preparedness to respond to accidents and emergencies

SASB EM-MM-540a.3

- All tailings storage facilities used by the Company are situated at a considerable distance from production sites and human settlements. Due to the fact that tailings storage facilities have an increased risk of negative environmental impact, local communities, and infrastructure facilities, the Company annually develops emergency response plans (ERPs) for hydraulic structures, separately for each tailings storage facility. Such plans include:
- operational section: a list of potential accidents at the hydraulic structure and a response system detailing the measures to be taken and the persons responsible for their implementation
 - emergency communication protocols and diagrams for both operating personnel and relevant local authorities, as well as for informing the wider public about the nature, scale, and potential consequences of the accident
 - material and financial reserves maintained by the Company to ensure a prompt response to any damage, accident, or emergency at the tailings storage facility's hydraulic structure
 - allocation of responsibilities among all parties involved in accident response and containment, along with a defined course of action
 - evacuation plans and maps for personnel and equipment in the event of an accident at the hydraulic structure
 - a schedule of emergency drills covering the key elements of the emergency response plan's operational section, conducted with the involvement of operating personnel. Such drills are conducted at least once every two years, with corresponding reports prepared following each exercise.

For more details on the emergency preparedness system, please see the [Accident and Emergency Preparedness](#) section.

There have been no emergencies at tailings storage facilities of the Company or Russian business units over the past five years.

Soil protection and responsible mining

Land protection

To reduce the negative impact of its operations on soil, Nornickel carries out progressive reclamation of land affected by deposit development¹, waste disposal, construction, and other activities.

Design documentation has been drawn up for the development, construction, and operation of deposits, including:

- an environmental impact assessment
- a list of measures to prevent and/or mitigate potential negative effects on the environment and ensure sustainable use of natural resources throughout the deposit life cycle.

Nornickel ensures full compliance with applicable Russian environmental legislation during deposit development and related activities. The Company also monitors environmental conditions throughout the entire life cycle of the deposit. Upon completion of deposit development, the Company commits to decommission mine workings and rehabilitate lands².

Disturbed and rehabilitated land area in 2024 (ha)

GRI 304-3 / TNFD C.O

Indicator	Total				
		during mining	during construction	during disposal of industrial and municipal solid waste	Including: during other activities
Total disturbed land area, beginning of period	17,164	14,312	1,262	874	716
Total rehabilitated area ³	71	7	0	—	64
Total disturbed land area in the reporting period	199	49	23	127	—
Total disturbed land area, end of period ⁴	17,292	14,354	1,286	1,001	652

¹ For the full list of deposits, please see the [Norilsk Nickel Group Profile](#) section.

² For a more detailed list of environmental protection measures taken during the deposit life cycle, please see [Nornickel's 2023 Sustainability Report](#).

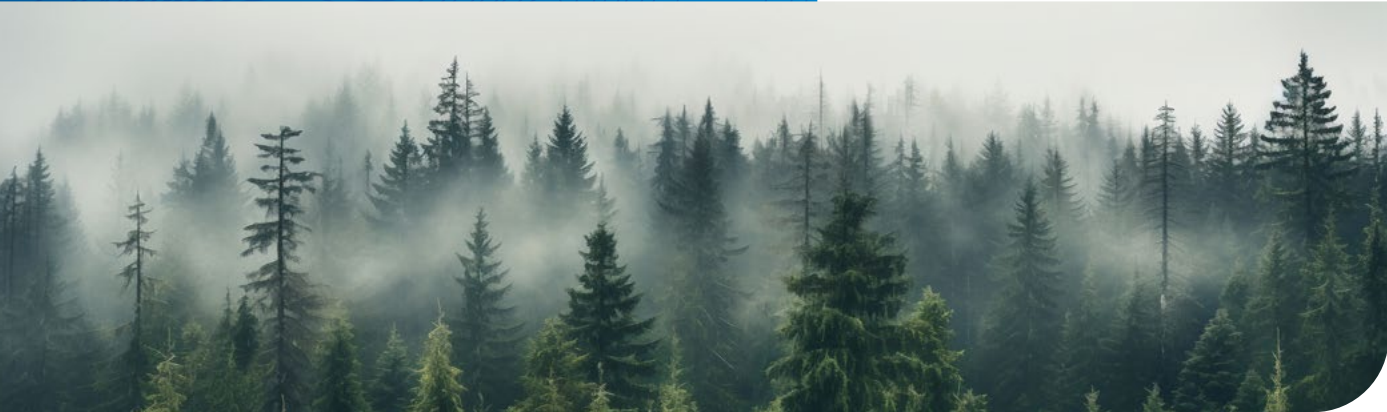
³ The table does not include data on disturbed and rehabilitated land near CHPP-3. In 2024, rehabilitation was limited to the Krasnoyarsk Territory.

⁴ Figures may not fully add up due to rounding.

Reforestation

In 2024, Nor Nickel continued its reforestation efforts, planting 87 ha of pine trees in the Sivyakovskoye Forestry of the Trans-Baikal Territory. This brought the total reforested area to 480 ha, including previous periods. All planted forest crops are maintained with silvicultural treatments for three years. A total of 112 ha of crops planted in the Verkhne-Chitinskoye Forestry in previous years underwent silvicultural treatments.

Given the forest fire risks identified in the area, the Company implements additional fire prevention measures, including ploughing two mineralised firebreaks around the perimeter of the planting area.



Completion of rehabilitation at CHPP-3

In 2023, the Company completed the rehabilitation of land contaminated by the fuel spill at CHPP-3 and disturbed during clean-up activities. The Company undertook to remedy any identified defects during the warranty period and to conduct a re-inspection in the absence of snow cover.

A follow-up examination of rehabilitated land conducted by an independent entity in 2024 confirmed that the chemical and physical soil indicators met quality standards and requirements of Russian laws. Nor Nickel plans to monitor this area in the coming years and assess how land rehabilitation efforts contribute to improving vegetation and soil conditions.

Responsible exploration

To replenish its resource base, Nor Nickel carries out a range of exploration activities, including geophysical and geochemical surveys, as well as drilling at prospective sites within the Company's existing footprint.

Nor Nickel sees a significant potential for the discovery of new deposits and therefore plans to continue exploration both within and beyond its footprint to unlock it.

13 exploration projects were completed by the Company in 2024

- Field exploration activities with environmental impact were carried out across three projects:
- 2 projects in the Norilsk Industrial District
 - 1 project in the Murmansk Region

Exploration areas of the Nor Nickel Group in 2024

Area/Deposit	Location	Key types of minerals
Mikchangdinskaya area ¹	Taimyrsky Dolgano-Nenetsky Municipal District, Krasnoyarsk Territory	Copper-nickel sulphide ores
Arylakhskaya area ¹	Taimyrsky Dolgano-Nenetsky Municipal District, Krasnoyarsk Territory	Copper-nickel sulphide ores
Mezhdurechenskaya (Yuzhno-Norilskaya) ²	Taimyrsky Dolgano-Nenetsky Municipal District, Krasnoyarsk Territory	Copper-nickel sulphide ores
Western flank of the Oktyabrskoye deposit ¹	Norilsk, Krasnoyarsk Territory	Copper-nickel sulphide ores
Southern flanks of the Talnakhskoye deposit	Norilsk, Krasnoyarsk Territory	Copper-nickel sulphide ores
Lake Baryernoye	Norilsk, Krasnoyarsk Territory	Metal-containing sediments
Kolmozerskoye deposit ³	Lovozerky District, Murmansk Region	Beryllium, niobium, lithium, lithium-containing ore, tantalum
Bystrinsko-Shirinskoye deposit ²	Trans-Baikal Territory, Gazimuro-Zavodsky Municipal District	Ore gold
Alenuyskaya area ¹	Alexandrovo-Zavodsky District, Trans-Baikal Territory	Gold-copper porphyry ores
Mostovskaya area ¹	Mogochinsky District, Trans-Baikal Territory	Gold-silver ores, copper ore, molybdenum ore
Shamyanskaya area ¹	Zabaikalsky District, Trans-Baikal Territory	Gold, copper-molybdenum ore
Doginskaya area ¹	Gazimuro-Zavodsky District, Trans-Baikal Territory	Gold-copper ores, gold-silver ores
Chuvanskaya area ²	Anadyrsky District, Chukotka Autonomous District, Kamchatka Territory	Gold-copper porphyry ores

The Group's exploration activities are governed by Russian regulations covering subsoil use, environmental protection, industrial and fire safety, and occupational hygiene. During exploration, Nor Nickel also conducts an internal

assessment of its environmental protection obligations based on the requirements of applicable laws in various jurisdictions, terms of licence agreements, and internal engineering estimates, as interpreted by the Company's management.



To preserve ecosystems, the Company avoids exploration in protected areas and world heritage sites, ensuring that its activities do not negatively impact indigenous livelihoods, cultural heritage, interests, or traditional lifestyles.

¹ Field exploration under the project is completed, with only desktop studies of the obtained data carried out in 2024.
² Initial phase; exploration is scheduled for 2025.
³ Licence to use subsoil for the exploration and production of mineral resources was received in 2023 by a joint venture of MMC Norilsk Nickel and a partner.

Environmental monitoring

To evaluate, monitor, and predict the environmental conditions under each project, the Company assesses the environmental setting at both the start and completion of exploration activities. The purpose of the assessment is to obtain and record reliable indicators characterising the natural environmental setting prior to the commencement of exploration.

The scope of such environmental setting assessment includes:

- analysis of available geological, geochemical, hydrogeological, hydrometeorological, and environmental data

- identification of disturbed lands through the analysis of aerial and satellite images and ground surveys
- sampling of environmental media (soil, surface water, bottom sediments, vegetation, background radiation)
- establishment of monitoring sites for hazardous exogenous geological processes.

The results of these studies inform the assessment of the environmental impact of exploration activities. Exploration is accompanied by annual monitoring of environmental media, including surface waters and snow cover, along with observations of hazardous exogenous geological processes. Through such monitoring, Nor Nickel identifies and assesses the impact of exploration on ecosystems, supporting informed management decisions on environmental protection and ensuring the environmental safety of indigenous livelihoods.

Alongside the monitoring, the Company implements a set of measures to protect subsoil, soil, vegetation, and water bodies. Upon completion of drilling, disturbed land undergoes rehabilitation, including the decommissioning of drilling sites, neutralisation of soil contaminated with fuel and lubricants, land levelling and restoration to a condition suitable for its intended use.

The negative environmental impact of exploration activities related to development of deposits was found to be insignificant, demonstrating the effectiveness of our environmental protection measures. For more details on the environmental impact of exploration, including a list of sources, types, and affected components, as well as the Company's environmental protection measures, please see [Nor Nickel's 2023 Sustainability Report](#).



Biodiversity

Biodiversity impact management

SASB EM-MM-160a.1 / UNCTAD B.6.1

Under its [2031 Environmental and Climate Change Strategy](#), the Company aims to ensure that its operations cause zero biodiversity loss.

The Company has in place [PJSC MMC Norilsk Nickel's Position Statement on Biodiversity](#), which outlines the key principles and commitments

as well as allocates responsibilities within the Group's corporate organisation to effectively manage its impact on ecosystems. Our biodiversity impact management system covers all life cycle phases of the Company's projects.

Nor Nickel's biodiversity principles

Nor Nickel's biodiversity principles

- Sustainable use of natural resources
- Ambition to protect and conserve the population and species diversity of terrestrial and aquatic living organisms
- Adherence to the boundaries of protected areas and recognition of their value
- Aspiration to prevent biodiversity loss

Nor Nickel's biodiversity commitments

- Identify and assess risks to and potential adverse impacts on biodiversity
- Make efforts to protect ecosystems from the introduction of invasive alien species
- Comply with national legislation and biodiversity-related requirements of international standards and associations
- Monitor the state of biodiversity
- Prohibit exploration and mining activities at World Heritage sites and UNESCO biosphere reserves, as well as in protected areas designated by the national legislation and in accordance with IUCN management categories 1–4
- Consult with stakeholders and collaborate with authorised organisations on biodiversity studies, monitoring, and conservation efforts
- Develop and follow the mitigation hierarchy to manage risks to and impacts on biodiversity
- Ensure that any new activities or changes to existing operations comply with commitments regarding protected areas