

Use of ozone-depleting substances

Nornickel neither produces nor uses ozone-depleting substances (ODS) in its products, except for extremely limited amounts with the following applications:

- A chemical agent for laboratory-based chemical analysis
- Filling and topping up compressors in air conditioning units, industrial air conditioners, and carbonated water machines, using refrigerant as a cooling agent for medium- and low-temperature refrigerating equipment

The Company reports on the use of such substances to the Russian Ministry of Natural Resources and Environment as required.

There were no ODS emissions in 2024.

6 sources

at Nadezhda Metallurgical Plant

1 source

at Copper Plant

16

environmental
monitoring
stations

were installed
in the Norilsk Industrial
District to set up
the system

Environmental monitoring programme: an automated emissions control system and compact atmospheric air quality monitoring stations

The programme targets two areas: mandatory government emissions control and voluntary urban air quality monitoring.

Compliance with legal requirements is ensured through the implementation of an automated emissions control systems at enterprises, which transmit data to regulatory authorities every 20 minutes on a continuous basis. An automated emissions control system is already used at Nadezhda Metallurgical Plant, with another system piloted at Copper Plant. In 2025, the Company plans to use these control systems to track the reduction in sulphur dioxide emissions as a result of the Sulphur Project at Nadezhda Metallurgical Plant.

In 2024, Nornickel launched the first integrated real-time air quality monitoring system for urban communities¹ in the Arctic Circle. The air quality index is calculated based on the extent to which permissible concentration limits are exceeded for four major pollutants. Current air quality indicators of the Norilsk Urban District are available on Norilsk’s official website.

In addition to observations, the Company forecasts pollution levels, which is especially important during periods of adverse weather conditions, when the accumulation of pollutants in the atmosphere is particularly active. Specialised systems using artificial intelligence analyse air flow patterns and predict the trajectory of emission plumes in advance. To reduce the risk of air pollution, Nornickel may scale back production ahead of adverse weather conditions.

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Nornickel consistently meets all commitments made by the Company under the Clean Air federal project, using the most advanced methods and best available technologies. This is a powerful example of how honouring our commitments can drive positive change. The launch of the air quality monitoring system in Norilsk became a symbol of the Company’s responsibility not only to the government, but also to the region, the city’s residents, and employees.

Norilsk residents are the primary beneficiaries of the system, which was originally designed with them in mind. Any Norilsk resident can access reliable information about the city’s air quality at any time. In doing so, the Company – being a backbone enterprise for Norilsk – demonstrates its commitment to transparency.

Alexander Popov,
Senior Vice President – Chief Operating Officer,
Head of Polar Division

¹ Norilsk, Kayerkan District, Talnakh.

Stakeholder engagement on air protection

Nornickel is a member of TC-457 Air Quality and TC-409 Environmental Protection technical standardisation committees. We review draft national standards in air protection and technical specifications for gas analysers.

The Company’s representatives sit on the working groups of the Committee for the Environment and Nature Management of a nationwide organisation

representing the interests of the business community and the Public Council of the Russian Ministry of Natural Resources and Environment.

During 2024, the Company engaged with the Project Management Office of the Clean Air federal project, VNII Ecology, the Federal Service for Supervision of Natural Resources, and the Federal Service for Hydrometeorology and Environmental Monitoring.

Water

Protection of water bodies

GRI 303-1, 303-2, 303-3, 303-4, 303-5 / UNCTAD B.1.1, B.1.2, B.1.3 / SASB EM-MM-140a.2

GRI 14.7.2, 14.7.3, 14.7.4, 14.7.5, 14.7.6

81%

of all water used
by the Company in 2024
was recycled and reused

Under the [2031 Environmental and Climate Change Strategy](#) and the [Position Statement on Water Stewardship](#), the Company is committed to reduce its impact on water bodies. Nornickel is committed to the sustainable use of water resources, adhering to national laws and leading industry standards, while actively engaging with stakeholders on water management matters.

For a list of Nornickel’s key water management principles, please see [Nornickel’s 2023 Sustainability Report](#).



No major impact of Nornickel’s operations on water bodies was identified; water withdrawal was within the pre-approved limits in 2024



Nornickel does not operate in areas with water stress²; accordingly, no water stress is reported across the Company’s footprint³



Sufficient volumes of water were supplied to Group enterprises and local communities

The Company withdraws water for production needs and discharges wastewater strictly in line with the pre-approved limits. Nornickel uses water from surface and underground sources for utility, drinking, and production needs, and also recycles and reuses it⁴. To promote water stewardship and reduce fresh water withdrawal, Nornickel operates a closed-loop water system.

Nornickel routinely monitors the quality of its wastewater to ensure compliance with regulatory requirements. Wastewater quality is assessed in accredited laboratories at legally mandated intervals. Wastewater discharges have no major impact on biodiversity of water bodies and related habitats.

All of the Company’s programmes include measures to ensure that concentrations of substances in wastewater meet regulatory requirements. Domestic sewage discharge points are equipped with biological or physicochemical treatment facilities bringing water released into water bodies in line with the applicable water quality standards.

Some production and mine wastewater is sent for reuse in industrial processes (to the concentrator as well as to sulphuric acid neutralisation under the Sulphur Project).

² According to the World Resources Institute (WRI)’s Aqueduct Water Risk Atlas.

³ The methodology to identify water-scarce areas is based on the data of the Aqueduct project of the World Resources Institute and climate zoning of the Russian Federation.

⁴ The Company does not withdraw water from protected areas or bodies included in the Ramsar Convention on Wetlands of International Importance.



A total of 82% of wastewater discharge points of the Group's branches and Business Units are equipped with full or partial treatment facilities. For all discharge points, measures are planned to upgrade treatment facilities, build new ones, or decommission existing discharge points.

The Company takes measures to ensure that the quality of mine and pit water meets established standards, guided by the best available technologies and cost-effectiveness considerations.

Managing water management risks

- The Company's risks related to water use include:
- pollution of water bodies resulting from tailings or petroleum product spills
 - pollution of water bodies due to poor performance of wastewater treatment facilities
 - depletion of water bodies caused by withdrawals exceeding permitted limits.

Nornickel continuously assesses its water impact through activities such as stock counting, monitoring of wastewater discharge volumes and quality, observation of surface water bodies at control points, monitoring of wastewater treatment processes, and implementation of relevant measures to improve treatment effectiveness.

Russian laws determine wastewater quality requirements, including process limits and maximum permissible concentrations of substances in water bodies used for fishery or cultural and household purposes. Nornickel's wastewater discharges into water bodies are predominantly in line with the pre-approved limits. In 2024, wastewater discharge increased by 52.1% y-o-y due to the discharge of standard-quality treated water used for cooling at CHPP-1.

In 2024, pollutants in effluents totalled 90 kt, down 43% y-o-y. The list of pollutants in wastewater is determined through studies that take into account the relevant technological processes.

GRI 303-3 GRI 14.7.4

Total water withdrawal from external sources¹ (Mcm)



- The Norilsk site's production enterprise (Talnakhskoye, Oktyabrskoye, Norilsk-1 deposits)
- The Energy Division's energy enterprise

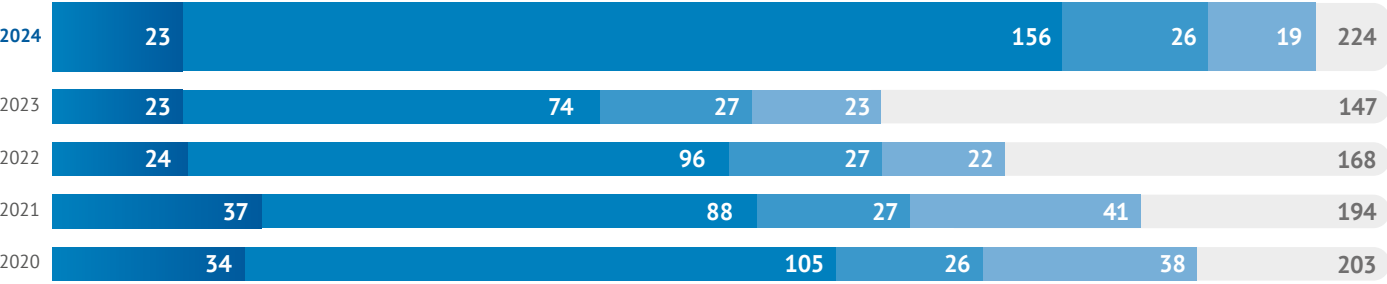
- The Kola site's metals and mining enterprise
- Other Group enterprises

In 2024, total water withdrawal from external sources grew 6 Mcm y-o-y due to fluctuations in the recycled water withdrawal for equipment cooling at the Energy Division's energy enterprise. Natural water inflow accounted for 15.5% of total

water withdrawal in 2024. The Company runs regular monitoring programmes for water bodies and water protection zones at all operational sites where water is used.

GRI 303-4 / TNFD C2.1 GRI 14.7.5

Total effluents (Mcm)

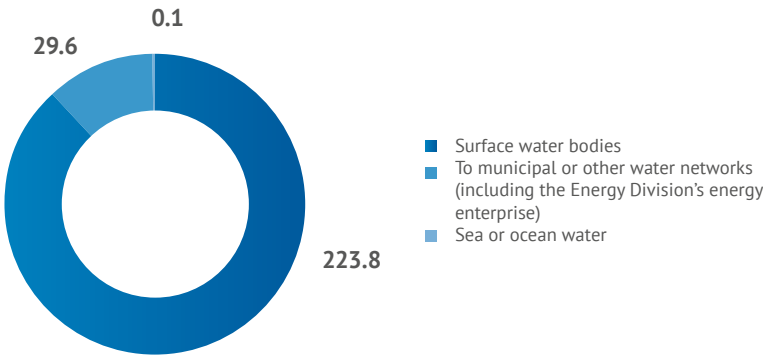


- The Norilsk site's production enterprise (Talnakhskoye, Oktyabrskoye, Norilsk-1 deposits)
- The Energy Division's energy enterprise

- The Kola site's metals and mining enterprise
- Other Group enterprises

GRI 303-4 GRI 14.7.5

Effluents by destination in 2024 (Mcm)



- Surface water bodies
- To municipal or other water networks (including the Energy Division's energy enterprise)
- Sea or ocean water

OPEX for wastewater collection, treatment, and disposal in 2024

RUB 5.4 bn

CAPEX for protection and sustainable use of water resources in 2024

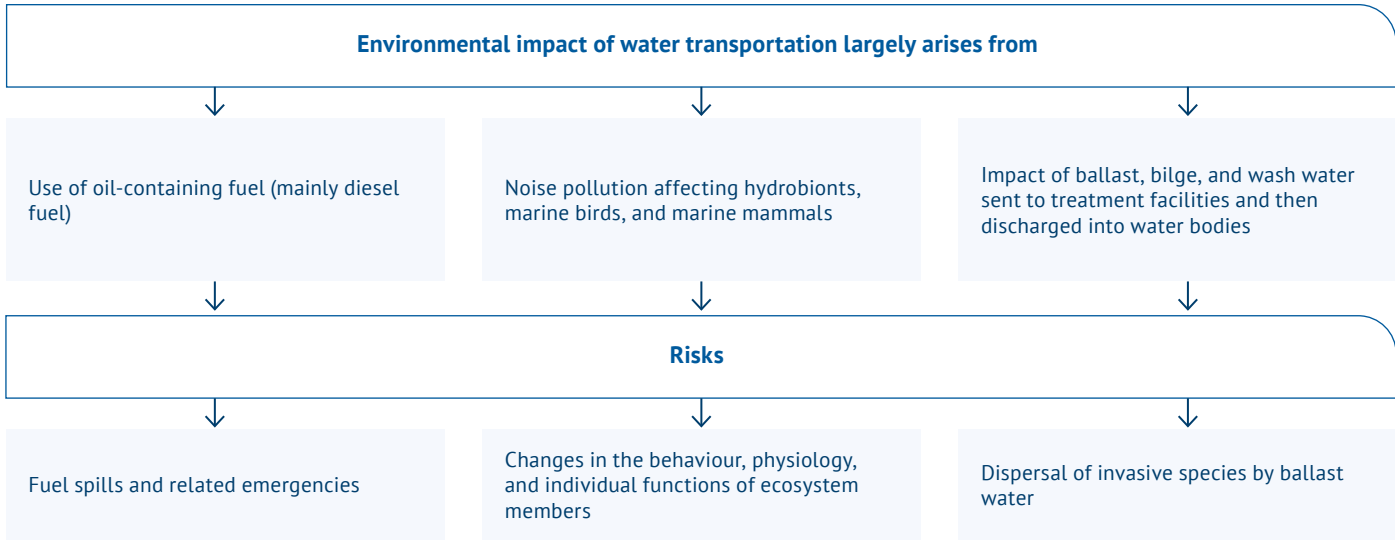
RUB 2.5 bn

¹ Excluding water withdrawal from the networks of the Energy Division's energy enterprise. Data includes the natural inflow of mine water.

Impact of transport on water bodies

GRI 303-1 GRI 14.7.2

The Company’s use of transport assets, including water transport, impacts the environment as evidenced by Big Scientific Expeditions.



Nornickel develops measures to mitigate risks associated with the negative impact of the Company's transport on water resources and implements environmental protection measures and programmes, including those aimed at reducing fuel consumption and preventing contamination of the Dudinka and Yenisei Rivers. In order to compensate for damage to aquatic biological resources and replenish the food resources of aquatic habitats, the Company regularly releases juvenile fish (for more details, please see the [Biodiversity](#) section).

The Company uses port infrastructure, including water transport, in line with applicable environmental laws on the prevention of water bodies pollution by vessels.

Thanks to the environmental fleet, the Yenisei River basin can be navigated without inflicting environmental damage.

Each year, the Company implements environmental protection measures to prevent damage to aquatic ecosystems from vessel operations. They include:

- laboratory measurements and analysis of surface water composition for compliance with sanitary and epidemiological rules and standards
- monitoring of surface water quality in navigable areas to ensure compliance with public health safety requirements
- maintenance and operation of environmental protection vessels
- upkeep of vessel systems to prevent pollution of water bodies, shoreline areas as well as fleet berthing, repair, and maintenance sites, including pollution caused by waste
- operational and environmental control over the condition of ambient air
- employee training in environmental safety programmes.

Each year during the navigation season, one of the Group's enterprises, a shipping company operating in the Yenisei River basin, deploys an environmental protection fleet, which includes:

5 waste collecting vessels

2 treatment plants

2 vessels for complex waste processing

The shipping company's auxiliary fleet provides the vessels with drinking water as well as collects and transports pollutants from vessels, including rubbish, faecal sewage and bilge water. In 2024, the shipping company's waste collecting vessels removed approximately 13.9 kt of wastewater

(up 4.5% y-o-y), 6.83 kt of oil-containing water (up 1.8x y-o-y), and over 282 tonnes of waste, while also delivering 4.68 kt of drinking water to vessels. Spending on environmental initiatives in 2024 totalled RUB 374 million, up 10% y-o-y.

Waste and tailings storage facilities

Sustainable waste management

GRI 3-3 / GRI 306-1, 306-2 / SASB EM-MM-150a.10, EM-MM-540a.2 GRI 14.5.2, 14.5.3

Nornickel's safe waste management is aligned with the key aspects of the public policy in this area. The [2031 Environmental and Climate Change Strategy](#) outlines the Company's waste management priorities, from regulatory compliance of waste disposal facilities in Russia to expanding the proportion of recycled waste across categories.

The Company's waste management complies with applicable Russian laws. Nornickel maintains records of waste generated, treated, recovered, neutralised, transferred to, or received from third parties, and disposed of; these records are aggregated on a quarterly and annual basis.

The Company monitors waste management throughout its entire life cycle, including the management of waste by third parties. Contracts for further waste management are made with third parties possessing all necessary permits, licences, state expert reviews, technical regulations, and specifications.

Contractors undertake to abide by environmental standards established both by the government and the Company. A relevant internal document provides for ongoing contractor monitoring and the imposition of sanctions for violations of environmental requirements and environmental damage.

