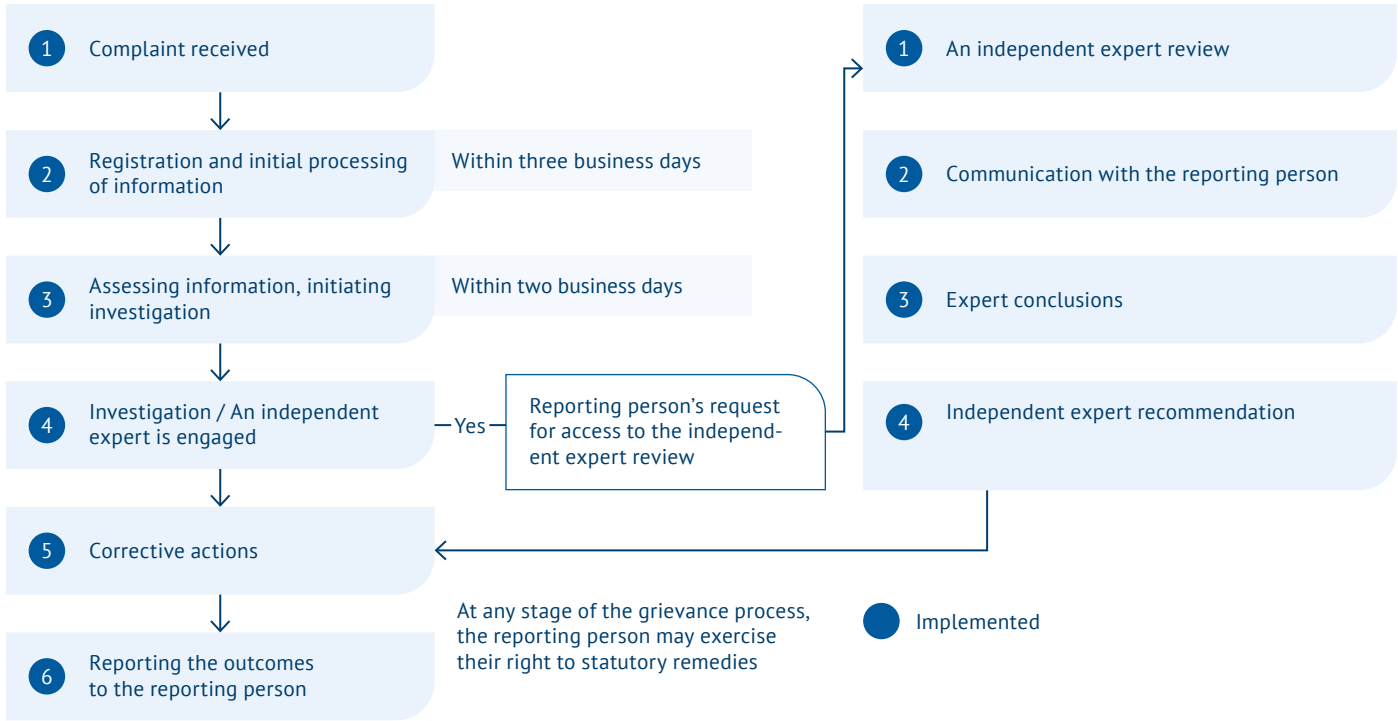


Grievance process flow



Standard turnaround times for grievances

Through the Corporate Trust Service – up to 21 business days
Through community liaison offices, Company managers, and other channels – up to 30 calendar days

The Company does not retaliate against reporting persons who raise concerns, meaning that no disciplinary action or sanction is taken. Reporting person status is regularly monitored at all levels to detect any cases of undue pressure.

Upon receipt of a complaint, the relevant Company unit is identified to verify the information, assess the need for additional data, and consider engaging independent experts or referring the case to government agencies.¹

The GM's effectiveness is assessed on an ongoing basis through feedback from reporting persons and regular analysis of satisfaction levels, as well as annually through stakeholder consultations in the Company's regions of operation and the "Let Everyone Be Heard. What Do You Think?" survey.

In 2024, particular attention was paid to standardising the process for handling complaints received through various channels and introducing unified operating principles. The Company continues to analyse incoming reports, identify systemic issues, and enhance feedback mechanisms to ensure timely responses and maintain a high level of stakeholder trust.

Updated Policy of Engagement with Indigenous Small-Numbered Peoples

In 2024, Nornickel updated its corporate document on engagement with indigenous minorities, emphasising their right to independently determine their development priorities. The Company recognises the vulnerability of these communities and is committed to considering their interests in its operations. It provides indigenous minorities with an accessible grievance mechanism through which they can report any trespassing, desecration, or destruction of sacred sites or burial areas by Company employees or contractors. The Company responds to such reports without delay and takes appropriate measures. The operation of the GM in the context of engagement with indigenous minorities is overseen by a third party (an independent expert).

¹ Done by the respective individuals or legal entities themselves: the Company does not forward reports to government authorities.

Business ethics and anti-corruption

Nornickel's anti-corruption approach

In conducting its core operations and building business relationships with stakeholders, Nornickel adheres to the principles of honest and ethical business conduct and maintains a zero-tolerance approach to all forms and manifestations of corruption at every level of the organisation.

The Company complies with [anti-corruption laws of the Russian Federation and other countries where it operates](#) and is guided by [international legal standards](#) and internal regulations listed in [Nornickel's 2023 Sustainability Report](#).

Key internal regulations on anti-corruption

- ✦ PJSC MMC Norilsk Nickel's Code of Conduct and Ethics for Members of the Board of Directors
- ✦ PJSC MMC Norilsk Nickel's Anti-Corruption Policy
- ✦ PJSC MMC Norilsk Nickel's Supplier Code of Conduct
- ✦ Business Ethics Code of PJSC MMC Norilsk Nickel

Nornickel's corporate codes, policies, and regulations define the key principles and focus areas of the Company's anti-corruption efforts, govern the management of corruption risks, and set standards of conduct for employees, suppliers, contractors, customers, and other stakeholders.

Anti-corruption: allocation of responsibilities

The roles and responsibilities within the anti-corruption compliance system are detailed in [PJSC MMC Norilsk Nickel's Anti-Corruption Policy](#).

The anti-corruption compliance team at Nornickel's Head Office provides advisory and methodological support on anti-corruption matters, develops procedures and mechanisms for managing corruption risks, and, within its remit, designs approaches to building corporate culture, promoting corporate values, and upholding ethical conduct. Individual KPIs are set annually for each member of the compliance team.

Reporting corruption

Any stakeholder may report suspected corruption anonymously via several available communication channels (for more information, please see the [Grievance Policy](#) section).

Nornickel guarantees protection for employees who report suspected corruption from retaliation, discrimination, or any form of pressure, including dismissal, reduced bonuses, or demotion.



Results of anti-corruption efforts in 2024

GRI 205-3 / SASB EM-MM-510a.1 / UNCTAD D.2.1/ MED-43

GRI 14.22.4

The Company has an anti-corruption compliance system in place to promote zero tolerance for violations of business ethics, bribery, and corruption. A range of internal initiatives is carried

out on a regular basis to enhance the system's effectiveness, including the review and update of the Company's anti-corruption procedural documents.

Measures aimed at developing and improving the anti-corruption compliance system in 2024



A mechanism for informing counterparties of the Company's anti-corruption requirements and principles¹ was adapted and launched



A training campaign on mitigating corruption risks when engaging with counterparties was delivered to Group employees responsible for implementing anti-corruption compliance procedures



Measures were taken to assess the effectiveness of controls implemented to mitigate corruption risks at the Group



A framework for tracking inquiries from regulatory and supervisory authorities regarding anti-corruption compliance across the Group was established



The development phase for automating the conflict of interest management module was launched²



An employee questionnaire survey was conducted to evaluate the state of corruption and the effectiveness of anti-corruption initiatives at the Company's branches and representative office



Measures were taken to monitor and assess compliance with the legal requirements of the Russian Federation regarding the employment of and contracting with former government officials

For more than 10 years, Nornickel has been a signatory to the Anti-Corruption Charter of Russian Business, and, as part of this commitment, biennially

presents a public statement affirming its adherence to anti-corruption standards.

In 2024, MMC Norilsk Nickel confirmed its leadership in the Anti-Corruption Ranking of Russian Business and received the highest **AAA+++** rating as a company with the most robust anti-corruption safeguards in place.

In addition, the Kola site's metals and mining enterprise, which participated in the ranking for the first time in 2024, demonstrated strong anti-corruption performance with an **AA+** rating and is focused on incorporating expert recommendations for improving its existing anti-corruption measures.

¹ The information materials are fully automated and available to every counterparty with whom an agreement is signed, via a link included in the anti-corruption clause.

² Scheduled for completion in 2025–2026.

Statistics on incidents of corruption in 2024

5

- total number of confirmed incidents of corruption
- number of confirmed incidents in which employees were disciplined for corruption (four of them dismissed)

0

confirmed incidents when contracts with business partners were terminated or not renewed due to violations related to corruption in 2024

RUB 3.1 mln

total amount of corruption-related fines imposed on the Company or its employees, paid or payable (i.e. acknowledged and not contested by the penalised party) in 2024

2

public legal cases regarding corruption brought against the Company or its employees or closed during the reporting period

Throughout the reporting period, joint efforts of Nornickel's Security Service and law enforcement agencies resulted in initiating:

- four criminal cases against seven Nornickel Group employees on charges of commercial bribery
- one criminal case against a Nornickel Group employee on charges of petty bribery.

Court verdicts were issued in two of the cases under Article 204 of the Criminal Code of the Russian Federation ("Commercial Bribery"), with five employees found guilty of the offences they were charged with.

Employee communication and training on anti-corruption

GRI 205-2

GRI 14.22.3

Communication and training on anti-corruption are a cornerstone of the Company's anti-corruption compliance system. The Company continuously works to strengthen this component, employing a wide range of tools to embed the principles of integrity in everyday actions of all Group employees. Accordingly, anti-corruption communication and training initiatives for employees are carried out in line with the approved annual plan. Specifically:

- Internal communication channels are used to facilitate regular broadcasts and publications, including information on:

- anti-corruption practices
- amendments to internal documents
- achievements and upcoming events related to anti-corruption compliance

- Concise memos summarising regulatory documents are developed
- Training programmes are designed and updated to ensure all employees, across all levels, are trained

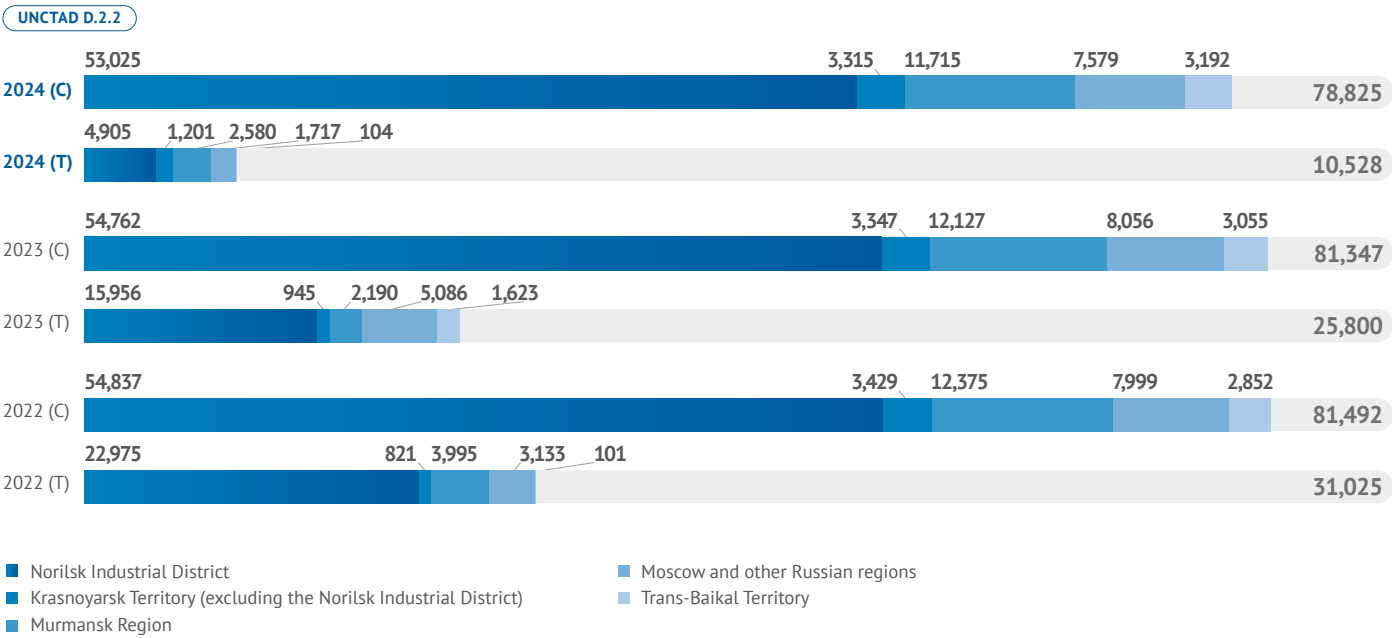
Communication and training events at the Company³

New employee hires	Briefing on anti-corruption
	Familiarisation with PJSC MMC Norilsk Nickel's Anti-Corruption Policy
	Signing an addendum to the employment contract outlining employees' anti-corruption obligations
All employees	Anti-Corruption remote learning course
HR employees	Course on anti-corruption compliance for HR services
Members of governance bodies	Anti-Corruption for Managers remote learning course

³ The listed online courses are available at any time on the Nornickel Academy corporate platform.

In addition, in 2024, an educational campaign was held to minimise corruption risks when engaging with counterparties, targeting Group employees responsible for implementing anti-corruption procedures as well as legal teams across the Nornickel Group.

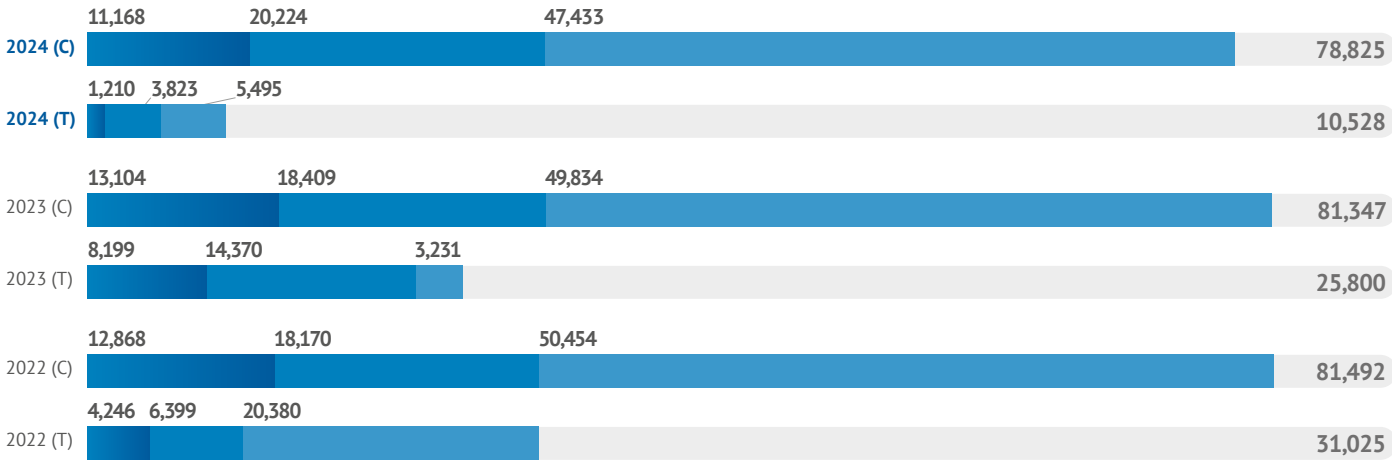
Number of employees that the Group’s anti-corruption policies and procedures were communicated to (C) and that received training (T) on them in 2022–2024, by region of operation¹



Indicators	Norilsk Industrial District			Krasnoyarsk Territory (excluding the Norilsk Industrial District)			Murmansk Region			Moscow and other Russian regions			Trans-Baikal Territory			Total		
	2022	2023	2024	2022	2023	2024	2022	2023	2024	2022	2023	2024	2022	2023	2024	2022	2023	2024
Share of employees that the Group's anti-corruption policies and procedures were communicated to	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Share of employees that received training on anti-corruption policies and procedures	0.42	0.29	0.093	0.24	0.28	0.36	0.32	0.18	0.22	0.39	0.63	0.23	0.04	0.53	0.03	0.38	0.32	0.13

¹ The decrease in the number of employees that have received training on anti-corruption policies and procedures was due to organisational changes: the remote learning course was updated at the end of 2022 and assigned to all Company employees to be completed by the end of Q1 2023. Accordingly, there was no need for training on this scale in 2024, and the course was only assigned to newly hired employees.

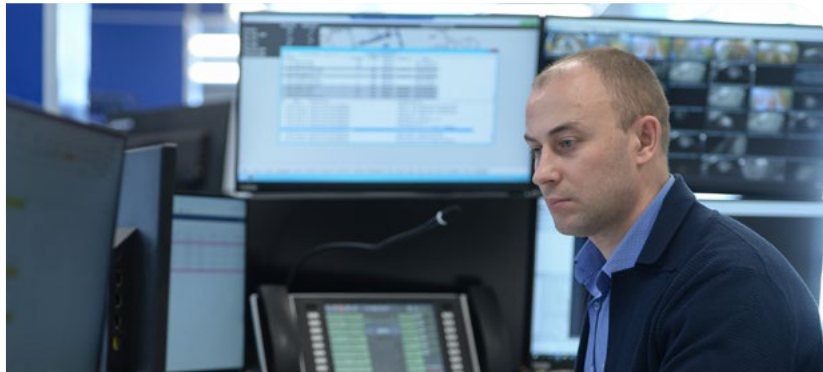
Number of employees that the Group’s anti-corruption policies and procedures were communicated to (C) and that received training (T) on them in 2022–2024, by category



- Managers
- White-collar employees
- Blue-collar employees

Indicators	Managers			White-collar employees			Blue-collar employees			Total		
	2022	2023	2024	2022	2023	2024	2022	2023	2024	2022	2023	2024
Share of employees that the Group’s anti-corruption policies and procedures were communicated to	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0	1.0
Share of employees that received training on anti-corruption policies and procedures	0.33	0.63	0.11	0.35	0.78	0.19	0.4	0.06	0.12	0.38	0.32	0.13

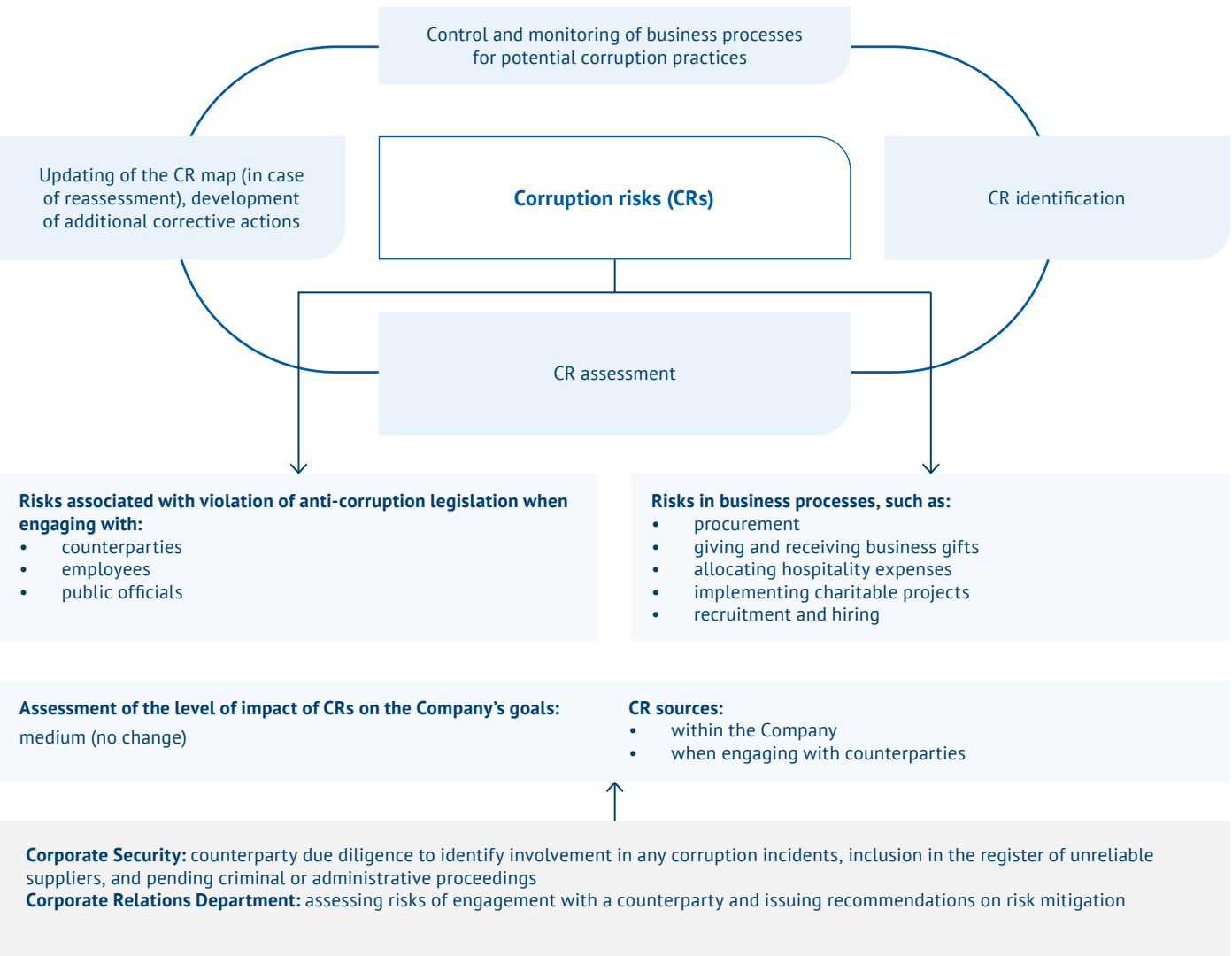
Corruption risk management at Nornickel



GRI 205-1 GRI 14.22.2

Corruption risks are included in Nornickel’s corporate risk register and are managed on a regular basis through processes such as identification, assessment, control, and monitoring, along with timely response and corrective actions where necessary.

Corruption risks (CRs)



Results of anti-corruption monitoring in 2024

✓ An initiative was put in place to oversee the practical enforcement of anti-corruption procedures across the Norinickel Group

100%

of the Group's Russian business units adopted the key anti-corruption regulations and procedures as at the beginning of 2024 (+9 p. p. y-o-y)

11.4%

of the Group's Russian business units received recommendations for approving and updating procedural documents, eliminating deficiencies, and enhancing controls in anti-corruption procedures

Managing conflicts of interest

Nornickel's key principles for managing conflicts of interest

Nornickel's key principles for managing conflicts of interest

Regulatory
compliance

Impartiality

Objectivity

Confidentiality

Nornickel places particular emphasis on the timely identification and prevention of conflicts of interest.

Regulations on the Prevention and Management of Conflicts of Interest at MMC Norilsk Nickel

require employees to disclose any conflicts of interest that may arise in performing their job duties if personal interests are involved

Standard declaration form approved at MMC Norilsk Nickel

completed by candidates applying for vacant positions at the Company and by individuals entering into independent contractor agreements

The Norilsk Nickel Group set up standing conflict of interest commissions to enhance the effectiveness of managing conflicts of interest and improve corporate culture.

In 2024, Nornickel developed and published an interactive memo on conflict of interest management, available on its corporate portal.

Measures to ensure compliance with antitrust laws



Nornickel maintains an antitrust compliance system aligned with Federal Law No. 135-FZ, On Protection of Competition, dated 26 July 2006.

Corporate Security identifies unfair competition risks as part of counterparty due diligence.

In 2024, no significant violations of antitrust legislation involving Nornickel were recorded.

Anti-money laundering, combating the financing of terrorism and proliferation of weapons of mass destruction

Nornickel's internal control system

Internal control in the AML/CFT/PWMD area

Risk-based approach

- Customer identification and due diligence
- Assessing the risk of suspicious transactions made by customers and assigning them to a risk group
- Taking measures to mitigate AML/CFT/PWMD risks and reduce their potential impacts
- Conducting audits to assess the Company's compliance with Federal Law No. 115-FZ
- Systematic training and testing of Company employees

Regulations:

- National laws:**
- Federal Law No. 115-FZ, On Anti-Money Laundering and Combating the Financing of Terrorism, dated 7 August 2001
 - Regulations of the Federal Financial Monitoring Service
- Internal documents:**
- MMC Norilsk Nickel's Internal Control Rules on Preventing Money Laundering, Terrorist Financing, and the Proliferation of Weapons of Mass Destruction (the "Internal Control Rules")

Allocation of responsibilities

- AML/CFT/PWMD internal controls are run continuously by designated employees across relevant units
- A designated officer is responsible for the implementation of the Internal Control Rules, submitting reports to the Company's President regarding their implementation status at the Company, and overseeing the Company's compliance with legal requirements in the AML/CFT/PWMD area