

Grievance policy

GRI 2-16, 2-25, 2-26, 207-2 / TNFD Gc

Corporate Trust Line

Nornickel's Corporate Trust Line (CTL) is a core grievance mechanism, enabling all stakeholders to submit complaints and reports across a broad range of topics including violation of human rights, protection of assets and corporate interests, prevention of abuse, theft, and other violations. The CTL helps ensure transparency in stakeholder engagement and supports the mitigation of risks related to potential conflicts or unethical practices.

It covers all Company units and Group entities and maintains uniform standards in handling reports and enabling a prompt response to emerging concerns.

The Company has in place the [Procedure for the Corporate Trust Line of PJSC MMC Norilsk Nickel](#), which defines roles and responsibilities, guiding principles, a description of the business process, associated risks, and relevant KPIs.

Operational profile of the Corporate Trust Line

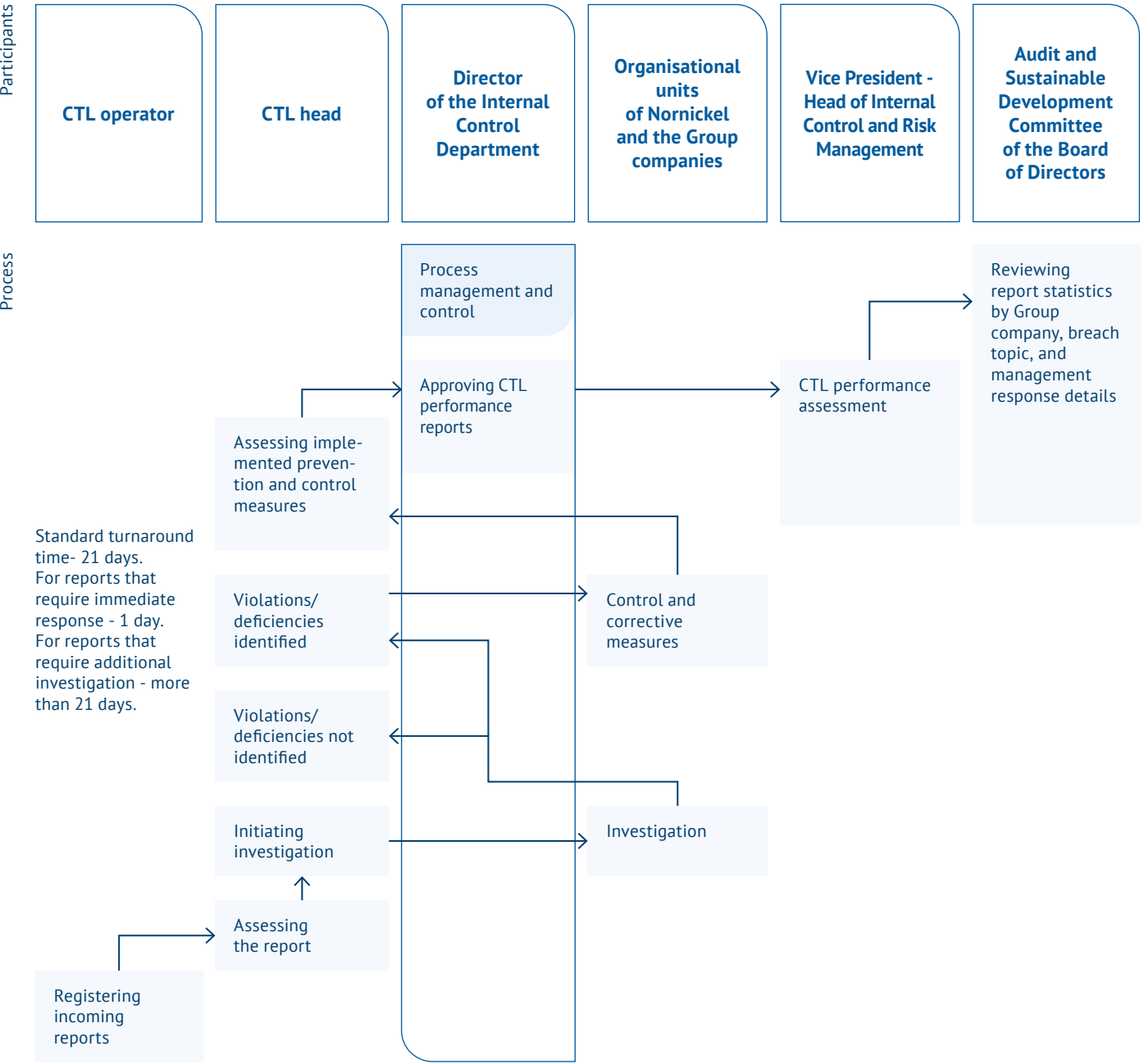
Key principles	Guaranteed confidentiality for reporting persons Independent consideration of reports Timely and unbiased consideration of all incoming reports, regardless of the position or tenure of the individual involved
Organisational structure	The CTL operates within the remit of the Internal Control Department
Employees responsible for the operation of the CTL	CTL operators – initial processing of reports Head of the CTL – coordination of activities, generation of reports Director of the Internal Control Department – general oversight and strategic guidance of the CTL's activities
Functions of organisational units	The Company's units that receive a request from the CTL are responsible for verifying the reported information, taking corrective actions, and submitting a follow-up report to the CTL. They are also promptly informed about the outcomes of the report review to support further oversight and decision making
Involvement of independent experts	The Sustainable Development Department coordinates the engagement of independent experts, including for complaint consideration and mediation, if requested by the reporting person ¹
Feedback	Reporting persons are provided with confirmation of the registration of their complaint/report, along with the option to complete a feedback form on the consideration and resolution process ²
Reporting	The Head of the CTL prepares a document containing report statistics by Group enterprise and by topic to inform unit heads and members of the Audit Committee of the Board of Directors.
CTL performance evaluation	Vice President – Head of Internal Control and Risk Management Audit Committee of Nornickel's Board of Directors Company employees covered by the “Let Everyone Be Heard. What Do You Think?” engagement survey via the questionnaire containing two questions about the CTL's performance

¹ In 2024, no requests to engage independent experts were submitted by reporting persons, and no external experts were engaged.
² An analysis of CTL interactions with reporting persons in 2024 showed that over 90% of reporting persons were satisfied with the response to their reports. Additional follow-up measures were taken for each unsatisfactory feedback, including with the involvement of experts from relevant functions, and follow-up communications with the reporting persons.

The Corporate Trust Line operates in strict accordance with the established procedure rules, ensuring the prompt and unbiased consideration of incoming reports. The standard turnaround time – from the moment a report is registered by a CTL operator to the review of investigation results by the responsible manager – is 21 business days. However, in certain cases (such as reports that require urgent response or situations that require in-depth analysis), the process may be accelerated or slowed down as needed.

If the reported information is confirmed, a set of corrective actions is initiated, including control measures, remediation of identified violations, and mitigation of potential consequences. When violations are identified, the Company addresses them while also developing measures to prevent similar cases in the future.

System for registering and reviewing reports submitted to the Corporate Trust Line



Contacts of the Corporate Trust Line

 skd@nornik.ru

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+7 (800) 700-19-45

 <https://nornickel.com/sustainability/corporate-hotline/>

 1st Krasnogvardeysky Drive 15, Moscow, Russia, 123112, Corporate Trust Line of MMC Norilsk Nickel

Information about the Corporate Trust Line is made available to employees via the intranet portal, the Company's website, information screens, physical stands, posters, and payslips.

Operational statistics of the Corporate Trust Line in 2024

1,279 reports

were received in 2024 (–38.5% y-o-y). The decrease in the number of reports is attributed to the launch of initiatives aimed at resolving employee concerns promptly on the ground. Employees are encouraged to raise their concerns with their immediate or higher-level managers to help improve the effectiveness of addressing violations or deficiencies. If the issue is not resolved, the employee may contact the Corporate Trust Line

651 reports

were accepted for consideration in 2024

696 reports

were resolved and closed in 2024 (26% confirmed, 74% not confirmed)¹

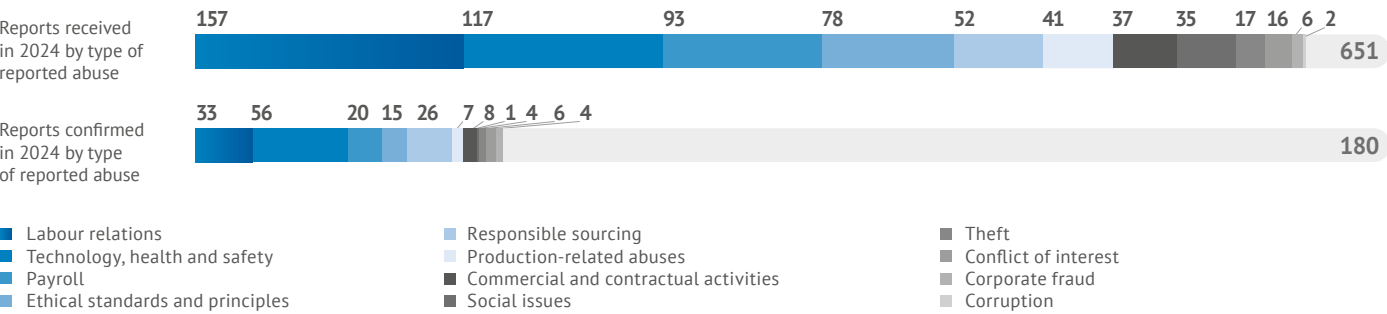
Corrective actions were taken to address all identified deficiencies. These measures included:

- purchasing and installing necessary equipment
- repairing premises and equipment
- remedying deficiencies across production and welfare facilities
- establishing claim management with counterparties, including sanctions for non-compliance with contract terms
- executing documents for allowance, compensation, and bonus payments
- providing employees with tools and PPE
- amending work and rest schedules
- holding regular team meetings to clarify concerns related to remuneration or organisational changes
- organising the work of commissions focused on resolving conflicts of interest and conflict situations
- holding employees at fault accountable through disciplinary action, including withholding bonuses.



As at 1 January 2024 and 31 December 2024, 146 and 101 reports were at the processing stage, respectively.

Breakdown of reports by type in 2024

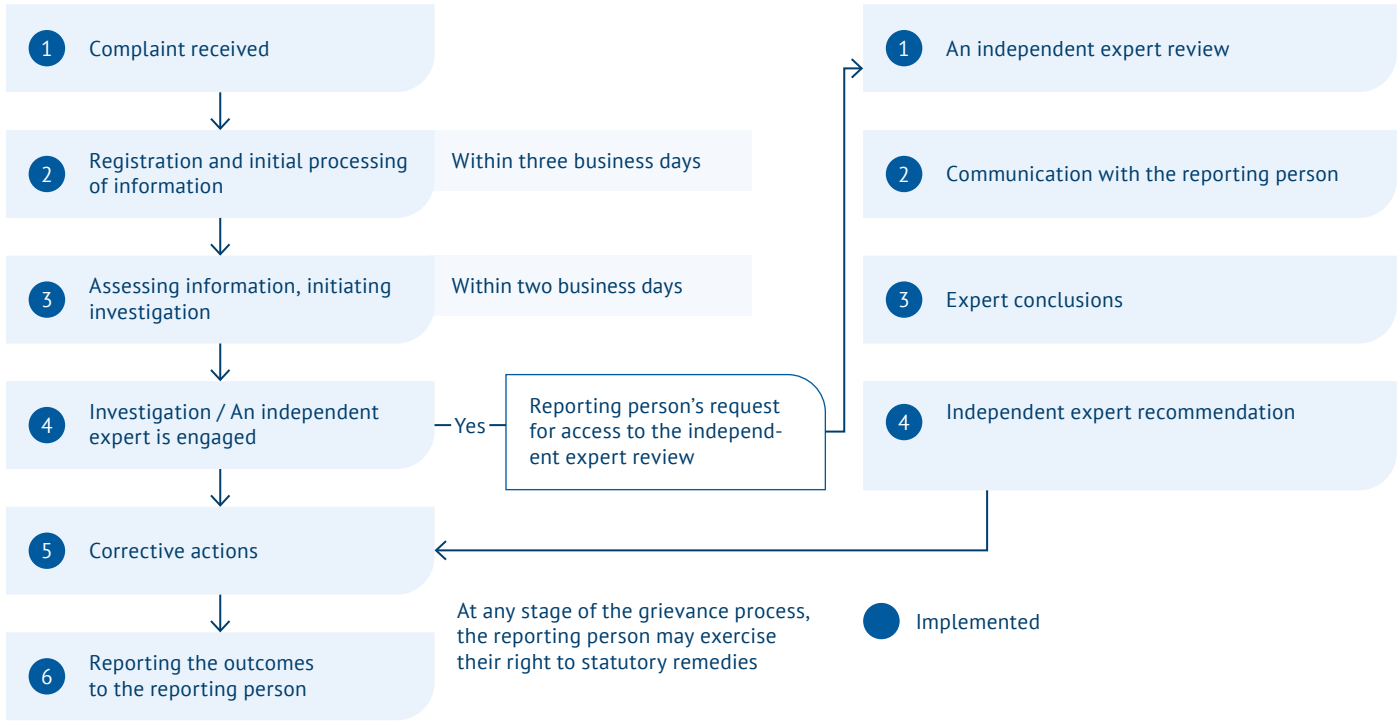


In 2024, the Corporate Trust Line and the Sustainable Development Department continued their collaborative efforts to advance the Company's human rights agenda. As part of this work, an automated system was introduced to classify incoming reports by category and subcategory. For more details, please see [Nornickel's 2024 Human Rights Report](#).



¹ Including the reports still pending at the beginning of 2024.

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.

