



Digital transformation of state and municipal administration, the economy, and social sphere

For more details, please see the [Digital Technology Development and Information Security](#) sections

Nornickel's performance highlights in 2024 and future plans

RUB 8.7 bn

Spending on IT initiatives and projects (119 projects in total)

Information security focus areas:

- protecting the Company's information systems and infrastructure;
- supporting import substitution and domestic solutions;
- contributing to market development by establishing and strengthening strategic partnerships;
- contributing to policymaking and best practices;
- fostering an information security culture among employees.



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The priorities set by companies and the efforts made at the regional level already cover virtually all the national goals the government has set for itself. We simply need to strengthen the areas already prioritised by the Krasnoyarsk Territory and Norilsk Nickel, and continue making improvements to maintain our leadership in sustainability.

Olga Bernatskaya,

Vice President of non-profit partnership Certified Professional Accountant (CPA)

Stakeholder engagement

GRI 2-29 / TNFD Gc

Building mutually beneficial, long-term relationships is at the core of the Company's efforts to achieve its goals and maintain agile and robust risk management while delivering results that align with the interests of both the Company and its diverse stakeholder groups.

designed to foster a transparent and trusted dialogue with various stakeholder groups. These plans are updated and prioritised annually as part of a consolidated register.

Nornickel adheres to the principle of open dialogue, ensuring reliable and timely communication with stakeholders on key matters, and welcomes feedback in the form of opinions, questions, comments, and suggestions to enable the development of joint solutions and identify common ground.

The Company uses its corporate website and social media platforms to regularly share information about its operational and financial results, social programmes for employees and local communities, environmental initiatives, and broader sustainability efforts.

In 2024, for the first time, stakeholder engagement plans of [the metals and mining enterprise at the Polar Division's Kola site](#), the [Trans-Baikal Division's mining and processing enterprise](#), and the [Norilsk site of the Polar Division](#) were published on the Company website. Each plan serves as a public document intended to facilitate communication with stakeholders. The documents outline the Company's principles, key engagement tools, and specific activities

Final reports on the implementation of the 2024 stakeholder engagement plans showed that the majority of activities were completed on time and to a high standard. Participants demonstrated strong interest, shared their opinions and suggestions, and expressed willingness to continue cooperation under the announced projects and programmes. An analysis of external and internal stakeholder surveys as well as open dialogues and Q&A sessions with stakeholders demonstrated a high level of satisfaction with the quality and quantity of information provided and compliance with the Company's principles outlined in PJSC MMC [Norilsk Nickel's Regulations on the Information Policy](#).

In 2024, the Company also developed and adopted procedural documents governing stakeholder engagement. These documents established engagement requirements and procedures and identified the employee roles responsible for implementing this process on the ground.

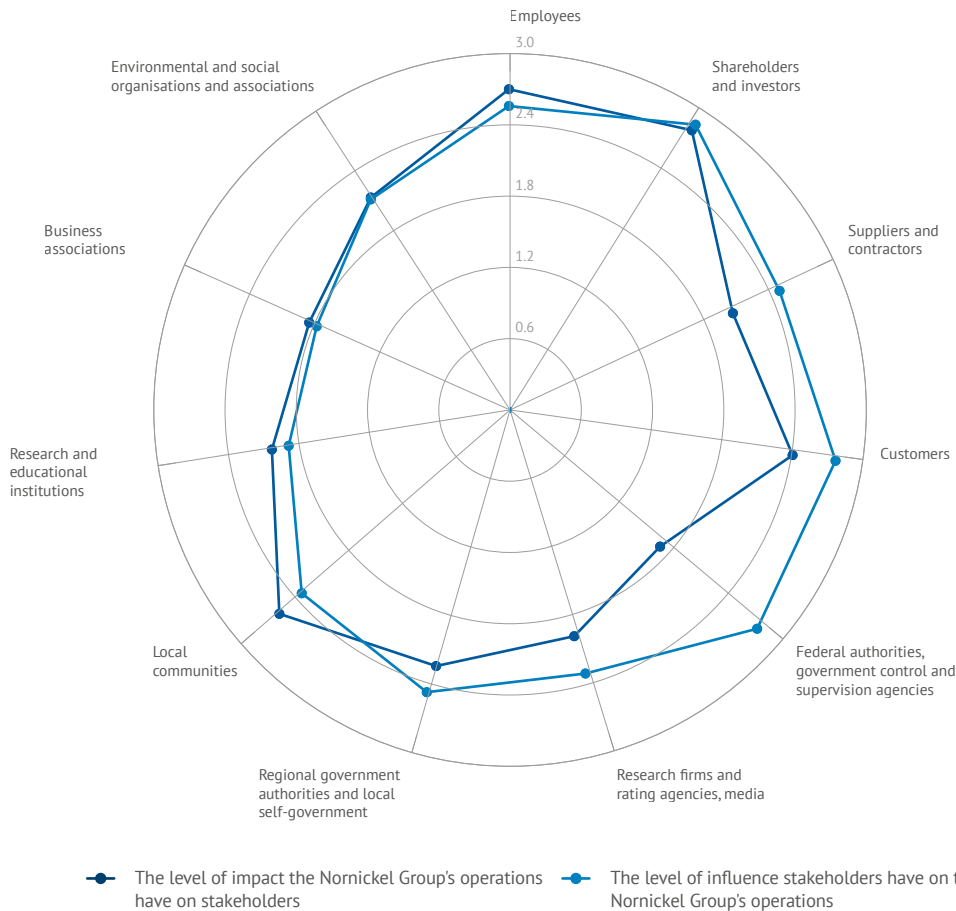
Through constructive engagement, the Company not only addresses stakeholder information needs related to its activities but also contributes to stronger governance and more effective efforts to support the development of its operating regions, civil society groups, and broader society.

Nornickel’s internal regulations on stakeholder engagement

Russian federal and regional laws and regulations	AccountAbility principles (AA1000 Stakeholder Engagement Standard)	ICMM’s Mining Principles	Requirements of the Initiative for Responsible Mining Assurance (IRMA)	Universal Declaration of Human Rights	Standard of responsibility of residents in the Arctic zone of the Russian Federation in relations with the indigenous peoples living and/ or carrying out traditional economic activities in the Arctic zone of the Russian Federation
Nornickel’s by-laws ¹	IFC Performance Standards	United Nations Declaration on the Rights of Indigenous Peoples	International standard ISO 26000:2010	UN Guiding Principles on Business and Human Rights (UNGPs)	

Nornickel’s stakeholder map

GRI 2-29



¹ The Company's principles and commitments around stakeholder engagement are outlined in PJSC MMC Norilsk Nickel's Stakeholder Engagement Policy, Business Ethics Code, and other related documents, all of which are publicly available on the Company website at <https://nornickel.com/investors/disclosure/corporate-documents/>. Annual Stakeholder Engagement Plans are also published on the Company website at <https://nornickel.com/sustainability/social-responsibility/communities/>. These plans are updated in the event of changes in operational, investment, or non-production activities, or when new stakeholders are identified.

² 595 out of the 665 questionnaires received were used to assess the level of impact. Anonymous responses and those in which respondents selected "Don't know" when asked to assess the level of impact Nornickel's operations have on stakeholder interests were excluded from the assessment.

The stakeholder map was compiled in 2024 based on an analysis of stakeholder registers prepared annually by the Company's production divisions, a survey of Head Office employees involving 32 managers and specialists, and a questionnaire survey of 665 representatives of external

and internal stakeholders², conducted as part of preparing this Report and determining material topics. Interests of each group and engagement mechanisms are presented in [Nornickel's 2023 Sustainability Report](#).



GRI 2-26, 2-29, TNFD Gc

Dialogue with employees

Employee engagement

67%
(in line with the industry)

Nornickel pays close attention to fostering internal communications. The Company operates a tiered system of town-hall meetings, enabling direct dialogue between employees and management of the Company, individual branches, or Russian business units. In 2024, this cadence of communication was traditionally launched by the Vice Presidents' Direct Line Q&A session, with more than 18 thousand employees participating online. Subsequently, Russian business units and their sub-divisions held corporate dialogues, involving enterprise CEOs and other key executives. This tiered format ensures that all

questions addressed to management at different levels receive a response. An employee engagement survey conducted by Nornickel indicates a high level of awareness among employees of what is happening at the Company.

By further developing the Supernika corporate mobile app, the Company strengthens ties between employees at different production sites and facilitates regular communication between them.

Dialogue with investors

>60
meetings with investment
funds and investor events
held

Nornickel continues to maintain an active dialogue with a wide range of investors and analysts. The Company provides disclosures in both Russian and English, using a variety of formats, including annual, sustainability, and dedicated reports, press releases, presentations, material fact statements, and interactive tools.

Investor materials are available in the [Investors section of the Company website](#).

In the reporting year, Nornickel participated in more than 60 meetings with investment funds and investor events, advancing its strategy for engaging

with retail investors, whose numbers exceeded 470 thousand, or approximately 13% of Nornickel's shareholder base. Growing the number of retail investors and their share in the Company's authorised capital to 25% remains a strategic priority.

The Company also holds regular conference calls and meetings with investors, participates in investment conferences, and organises site visits to the Company's production sites.

Dialogue with business partners

Customer satisfaction score:

2.96

(out of 3.0)

>13.7
thousand

suppliers registered in SAP SRM

Customers

In 2024, the Company's products were supplied to key metal-consuming regions. The share of supplies to the Russian market remained stable. The Group sells its products globally, both through its own sales offices in Europe, China, and Russia and via distributors in other regions.

Suppliers of goods, works, and services (accounting for 35% of the Group's total procurement) were assessed for compliance with the [Code's requirements](#)

Suppliers

The Company promotes the sustainability agenda among its suppliers and contractors, encouraging them to comply with corporate standards in this area while also improving procurement efficiency. Nornickel's evolving supply chain due diligence management system helps monitor and select top-tier counterparties that align with sustainability principles. Since 2021, the Company has assessed mineral suppliers, and starting in 2023, it expanded its assessment to include suppliers of goods, works, and services to verify compliance with the [Supplier Code of Conduct of PJSC MMC Norilsk Nickel](#).

Dialogue with authorities and non-profit organisations

88

working bodies, established by non-governmental organisations and government authorities, include the Group's representatives

Company representatives directly participate in dedicated committees, councils, commissions, round table discussions, and working groups set up by federal legislative and executive authorities as well as by NGOs representing the interests of the industry, wider business, or other stakeholders.

Nornickel experts also contribute to discussions on draft regulations through anti-corruption due diligence procedures and regulatory impact assessments, helping to maintain a constructive dialogue with authorities, cut administrative red tape, and improve the overall business climate in the country.

Dialogue with local communities

Continued operation of regional development centres

Improving the well-being of local communities is among Nornickel's strategic objectives. To achieve this, the Company works to create conditions for developing host regions and improve the attractiveness of the social environment. The Company's priority in this area is to support local social initiatives, encourage community cooperation, and build social capital. Nornickel backs numerous initiatives and activities carried out by territorial development institutions, endowment funds, and through programmes such as the World of New Opportunities, Plant of Goodness, and others.

Nornickel's engagement with indigenous peoples is guided by the goals of promoting their sustainable development and preserving their traditional habitats. Nornickel complies with all applicable international norms and standards relating to indigenous engagement and recognises the rights of indigenous peoples to maintain their traditional lifestyle, indigenous trades, culture, and historical heritage. These commitments are upheld through relevant programmes and initiatives.

Environmental protection dialogue

2

key cooperation agreements signed with Rosprirodnadzor

Nornickel contributes to the development and promotion of legislative initiatives in environmental protection, natural resource use, and biodiversity conservation.

As part of its cooperation agreements with Rosprirodnadzor, Nornickel engages in information exchange as well as joint planning and implementation of environmental initiatives. This includes participation in the Clean Air federal project and efforts to develop and introduce automated measurement and monitoring systems for emissions and effluents.

In 2024, Nornickel hosted a corporate environmental forum – Environmental Strategy: the Challenge of Time, as well as corporate workshops on environmental risk management and the application of environmental legislation, tailored for employees of its branches and Russian business units.

Nornickel's corporate volunteer groups and charitable programmes also contribute to addressing various environmental issues in the Company's regions of operation, including tree planting, clean-up campaigns, and other local initiatives.

Dialogue with the public and media

Ranked **1st**

among M&M companies in terms of media mentions in the Russian media landscape

Nornickel maintains its position as one of the most transparent and widely represented companies in the media. In 2024, media coverage of the Company remained strong, with the number of mentions exceeding the industry average for the mining and metals sector.

Nornickel views public reporting as a key communication channel. It discloses quarterly operating results and accounting statements under

the Russian Accounting Standards on the Company website. In addition, consolidated financial statements and issuer reports are published every six months in line with legal requirements.

Dialogue with stakeholders for sustainability reporting

554

people participated in the materiality survey conducted for this Report (+53% y-o-y)

Each year, when preparing its sustainability reports, the Company engages in stakeholder¹ dialogues and conducts surveys to identify material topics.

[For more details, please see the Determining Material Topics section.](#)

Nornickel also discloses its sustainability performance to a broad range of stakeholders on an annual basis.

¹ External stakeholders include federal and regional government authorities, local communities, non-profit organisations, mass media, customers, partners, suppliers, shareholders, investors, and others. Internal stakeholders include all employees of the Nornickel Group.