

**Company Name** Nornickel  
**Industry** Extractives  
**UNGP Core Score (\*)** 7.0 out of 26

Score	Out of	For indicators
<b>Governance and Policy Commitments</b>		
2	2	A.1.1 Commitment to respect human rights
0.5	2	A.1.2 Commitment to respect the human rights of workers
1	2	A.1.4 Commitment to engage with stakeholders
1	2	A.1.5 Commitment to remedy
<b>Embedding respect and Human Rights Due Diligence</b>		
Embedding respect		
0	2	B.1.1 Embedding - Responsibility and resources for day-to-day human rights functions
Human Rights Due Diligence (HRDD)		
0	2	B.2.1 HRDD - Identifying: Processes and triggers for identifying human rights risks and impacts
0	2	B.2.2 HRDD - Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)
0	2	B.2.3 HRDD - Integrating and Acting: Integrating assessment findings internally and taking appropriate action
0	2	B.2.4 HRDD - Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts
0	2	B.2.5 HRDD - Reporting: Accounting for how human rights impacts are addressed
<b>Remedies and Grievance Mechanisms</b>		
1.5	2	C.1 Grievance channels/mechanisms to receive complaints or concerns from workers
1	2	C.2 Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities
0	2	C.7 Remedying adverse impacts and incorporating lessons learned
<b>7.0</b>	<b>26</b>	

(\*) Instead of the full list of indicators in the 2020 CHRB Methodology, this year's assessment uses the CHRB Core UNGP Indicators. These are 13 non-industry specific indicators that focus on three key areas of the UNGPs: high level commitments, human rights due diligence and access to remedy.

The 13 indicators selected from the full CHRB Methodology are scored on a simple unweighted basis, with a maximum of 2 points for each indicator for a maximum total of 26 points.

In addition, allegations of severe human rights impacts (Measurement Theme E) were also assessed but do not impact overall final scores

Please note that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2020 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

## Detailed assessment

### Governance and Policies

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: UNGC principles 1 &amp; 2: The company is signatory of the UN Global Compact. [Global Compact website, N/A: <a href="https://unglobalcompact.org">tps://unglobalcompact.org</a> &amp; Letter of commitment to UNGC, 05/09/2016: <a href="https://s3-us-west-2.amazonaws.com/ungc-production/commitment_letters/94191/original/The_letter_of_commitment_Norilsk_Nickel.pdf?1473237589#s3-us-west-2.amazonaws.com">tps://s3-us-west-2.amazonaws.com/ungc-production/commitment_letters/94191/original/The_letter_of_commitment_Norilsk_Nickel.pdf?1473237589#s3-us-west-2.amazonaws.com</a>]</li> <li>Met: International Bill of Rights: The Company states that it 'respects international human rights protection and labour standards set out in the International Bill of Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights'. [Human Rights Policy, 18/09/2017: <a href="http://nornickel.com">nornickel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: UNGPs: As indicated above the Company 'respects international human rights protection and labour standards set out in [...] the UN Guiding Principles on Business and Human Rights'. [Human Rights Policy, 18/09/2017: <a href="http://nornickel.com">nornickel.com</a>]</li> </ul>
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: UNGC principles 3-6: The Company is signatory to the UN Global Compact [Human Rights Policy, 18/09/2017: <a href="http://nornickel.com">nornickel.com</a> &amp; Letter of commitment to UNGC, 05/09/2016: <a href="https://s3-us-west-2.amazonaws.com/ungc-production/commitment_letters/94191/original/The_letter_of_commitment_Norilsk_Nickel.pdf?1473237589#s3-us-west-2.amazonaws.com">tps://s3-us-west-2.amazonaws.com/ungc-production/commitment_letters/94191/original/The_letter_of_commitment_Norilsk_Nickel.pdf?1473237589#s3-us-west-2.amazonaws.com</a>]</li> <li>Not met: Explicitly list All four ILO apply to EX BPs: However, the 'Working conditions policy' states that 'to the extent possible, the Company also expects its contractors to comply with the principles and provisions of this policy', which covers child labour and forced labour. [Working conditions policy, 18/09/2017: <a href="http://nornickel.com">nornickel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>Met: Explicit commitment to All four ILO Core: The code indicates that 'we strictly obey the principles of the prevention of any form of discrimination and forced labor'. In addition, the Freedom of Association Policy states that it 'respects the rights and trade union freedoms of the Company's employees. The Company guarantees that every employee has the right to join a trade union and the right to be represented by a trade union in collective bargaining'. Finally, the 'Working conditions policy' states that 'the Company does not use child labour and conducts thorough candidate checks before hiring staff to avoid using child labour'. [Freedom of Association Policy, 2017: <a href="http://nornickel.com">nornickel.com</a> &amp; Working conditions policy, 18/09/2017: <a href="http://nornickel.com">nornickel.com</a>]</li> <li>Met: Respect H&amp;S of workers: The Company's health and safety policy has the goal of setting up 'healthy and safe working conditions by attaining an operational level that matches the current level of scientific and engineering achievements, including responsibilities for performance of an internal expertise to examine compliance of the preliminary design and design solutions with the safety requirements as well as guided by the principle of prioritizing life and health of the workers compared to the results of operational activities'. [Occupational health and safety policy, 24/04/2008: <a href="http://nornickel.com">nornickel.com</a>]</li> <li>Not met: H&amp;S applies to EX BPs</li> </ul>
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>Met: Commits to stakeholder engagement: The Company commits in its human rights policy to 'communicate and engage with those affected by the Company's operations [...] maintain ongoing dialogue with stakeholders taking into account</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>their views on human rights [...] inform all stakeholders about the Corporate Trust Service as a mechanism for reporting any human rights violations'. [Human Rights Policy, 18/09/2017: <a href="http://nornickel.com">nornickel.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Regular stakeholder engagement: The Company indicates in the CSR report that its 'key stakeholders are employees, shareholders, investors, business partners, national authorities, local communities and Russian and International non-profit organisations'. The Company discloses for each group their key interests, the interaction mechanisms and the key interaction events in the last reporting year. Key interests include 'favourable working conditions', 'decent salaries', 'tender-based procurement', 'social stability support across the Company's geographies', etc. [Sustainability Report 2018, 2019]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Commits to engage stakeholders in design</li> <li>• Not met: Regular stakeholder design engagement</li> </ul>
A.1.5	Commitment to remedy	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to remedy: The Company states in its human rights policy that 'Nornickel takes appropriate company-wide measures to prevent and remedy violations of human rights whenever such violations are identified'. In addition, in relation to 'correction and improvement' of human rights it states that it 'commits' to 'cooperate with public and law-enforcement authorities in addressing human rights; review, in a timely and unbiased manner, all reports received by the Corporate Trust Service; and, eliminate human rights violations'. [Human Rights Policy, 18/09/2017: <a href="http://nornickel.com">nornickel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Not obstructing access to other remedies</li> <li>• Not met: Collaborating with other remedy initiatives</li> <li>• Not met: Work with EX BPs to remedy impacts</li> </ul>

## Embedding Respect and Human Rights Due Diligence

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commits to ILO core conventions: See indicator A.1.2</li> <li>• Not met: Senior responsibility for HR: The Human rights policy states that 'The Company's management on all levels is committed to respecting human rights and complying with the Russian and international laws and internal regulations governing human rights policies. In addition, the Company has a clear management structure and escalation and reporting lines'. The Sustainability report indicates that 'all executive efforts are coordinated by MMC Norilsk Nickel's Management board' and indicates the different board committees. However, no specific details found in relation to senior person/committee responsible for human rights, as descriptions found refers to management board generally. [Human Rights Policy, 18/09/2017: <a href="http://nornickel.com">nornickel.com</a> &amp; Sustainability report 2019, 04/2020: <a href="http://nornickel.com">nornickel.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Day-to-day responsibility: The Company discloses a chart showing 'operational management'. However, it shows all senior executives, units and sustainability areas. It is not clear how human rights-related issues management is articulated. [Sustainability report 2019, 04/2020: <a href="http://nornickel.com">nornickel.com</a>]</li> <li>• Not met: Day-to-day responsibility for EX BRs</li> </ul>
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not met: Identifying risks in own operations: Although the Company discloses the list of material aspects and boundaries, no evidence found of a formal system to identify which are the human rights risks that it faces. [Sustainability report 2019, 04/2020: <a href="http://nornickel.com">nornickel.com</a>]</li> <li>• Not met: identifying risks in EX business partners</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not met: Ongoing global risk identification</li> <li>• Not met: In consultation with stakeholders</li> <li>• Not met: In consultation with HR experts</li> <li>• Not met: Triggered by new circumstances</li> <li>• Not met: Explains use of HRIAs or ESIA (inc HR)</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Salient risk assessment (and context)</li> <li>• Not met: Public disclosure of salient risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Action Plans to mitigate risks</li> <li>• Not met: Including amongst EX BPs</li> <li>• Not met: Example of Actions decided</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirements under score 1 met</li> </ul>
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: System to check if Actions are effective</li> <li>• Not met: Lessons learnt from checking effectiveness</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Both requirement under score 1 met</li> </ul>
B.2.5	Communicating : Accounting for how human rights impacts are addressed	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Not met: Comms plan re identifying risks</li> <li>• Not met: Comms plan re assessing risks</li> <li>• Not met: Comms plan re action plans for risks</li> <li>• Not met: Comms plan re reviewing action plans</li> <li>• Not met: Including EX business partners</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Not met: Responding to affected stakeholders concerns</li> <li>• Not met: Ensuring affected stakeholders can access communications</li> </ul>

## Remedies and Grievance Mechanisms

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>• Met: Channel accessible to all workers: The Company indicates that 'we rely on our Corporate Trust Service to ensure prompt response to any reports of abuse, embezzlement or other violations. The Service's remit extends across all business units of the Company and Group companies. Report statistics are submitted to the Audit and Sustainable Development Committee of the Board of Directors and the Company's business units on a quarterly basis'. [Sustainability report 2019, 04/2020: <a href="http://nornickel.com">nornickel.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>• Met: Number grievances filed, addressed or resolved: The Company discloses the number of breaches and breaks them down by type. The Company received 481 reports, 137 were accepted for investigation. From the accepted reports, 36 were related to 'Payroll abuses', 30 to 'Technology and safety abuses (excluding environment)', 20 to 'Labour disputes' and 1 to 'Social issues'. [Sustainability report 2019, 04/2020: <a href="http://nornickel.com">nornickel.com</a>]</li> <li>• Not met: Channel is available in all appropriate languages</li> <li>• Met: Opens own system to EX BPs workers: The Company states on its Sustainability Report that 'To make a report, anyone is invited to call a toll-free hotline available 24/7 [...] or e-mail to [...]. The Company reports on the performance of the channel, which shows the type of reports received, including human rights-related complaints'. No new evidence found in latest reports nor website. [Sustainability Report 2018, 2019 &amp; Corporate trust (hotline), N/A: <a href="http://nornickel.com">nornickel.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Grievance mechanism for community: The Company states in the CSR report that 'any interested person may contact the service', and the annual report also indicates that it is open to 'shareholders and other stakeholders'. The Company also has a 'grievance redressal system' for external stakeholders, and the matter will be escalated up to the Board. [Sustainability Report 2018, 2019 &amp; Annual Report 2018, 2019: <a href="http://nornickel.com">nornickel.com</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Describes accessibility and local languages: Although the reporting channels are available on the website, it is not clear whether it is possible to establish communications in local languages. [Corporate trust (hotline), N/A: <a href="http://nornickel.com">nornickel.com</a>]</li> <li>Not met: Expects EX BPs to have community grievance systems</li> <li>Not met: EX BPs communities use global system</li> </ul>
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not met: Describes how remedy has been provided</li> <li>Not met: Says how it would remedy key sector risks</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not met: Changes introduced to stop repetition</li> <li>Not met: Approach to learning from incident to prevent future impacts</li> <li>Not met: Evaluation of the channel/mechanism</li> </ul>

## Performance: Responses to Serious Allegations (Not included in the overall score)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		No allegations meeting the CHRB severity threshold were found.

### Disclaimer

A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.

See the 2020 Key Findings report and the 2019 technical annex for more details of the research process.

The Benchmark is made available on the express understanding that it will be used solely for general information purposes. The material contained in the Benchmark should not be construed as relating to accounting, legal, regulatory, tax, research or investment advice and it is not intended to take into account any specific or general investment objectives. The material contained in the Benchmark does not constitute a recommendation to take any action or to buy or sell or otherwise deal with anything or anyone identified or contemplated in the Benchmark. Before acting on anything contained in this material, you should consider whether it is suitable to your particular circumstances and, if necessary, seek professional advice.

The CHRB is part of the World Benchmarking Alliance ('WBA'). The material in the Benchmark has been put together solely according to the CHRB methodology and not any other assessment models in operation within any of the project partners or EIRIS Foundation as provider of the analyst team.

No representation or warranty is given that the material in the Benchmark is accurate, complete or up-to-date. The material in the Benchmark is based on information that we consider correct and any statements, opinions, conclusions or recommendations contained therein are honestly and reasonably held or made at the time of publication. Any opinions expressed are our current opinions as of the date of the publication of the Benchmark only and may change without notice. Any views expressed in the Benchmark only represent the views of WBA, unless otherwise expressly noted.

While the material contained in the Benchmark has been prepared in good faith, neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers or employees accept any responsibility for or make any representation or warranty (either express or implied) as to the truth, accuracy, reliability or completeness of the information contained in this Benchmark or any other information made available in connection with the Benchmark. Neither WBA nor any of its agents, representatives, advisers, affiliates, directors, officers and employees undertake any obligation to provide the users of the Benchmark with additional information or to update the information contained therein or to correct any inaccuracies which may become apparent (save as to the extent set out in CHRB appeals procedure). To the maximum extent permitted by law any responsibility or liability for the Benchmark or any related material is expressly disclaimed provided that nothing in this disclaimer shall exclude any liability for, or any remedy in respect of, fraud or fraudulent misrepresentation. Any disputes, claims or proceedings this in connection with or arising in relation to this Benchmark will be governed by and construed in accordance with Dutch law and shall be subject to the exclusive jurisdiction of the Courts of Amsterdam.

As WBA, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.

#### COPYRIGHT

Our publications and benchmarks are the product of the World Benchmarking Alliance. Our work is licensed under the Creative Commons Attribution-Non Commercial-No Derivatives 4.0 International License. To view a copy of this license, visit [creativecommons.org](https://creativecommons.org)