

**Corporate Human Rights Benchmark
2023 Company Scorecard**

Company name Nornickel
Sector Extractives
Overall score 21.0 out of 100

Theme score	Out of	For theme
2.5	10	A. Governance and Policy Commitments
1.4	25	B. Embedding Respect and Human Rights Due Diligence
6.0	20	C. Remedies and Grievance Mechanisms
6.9	25	D. Performance: Company Human Rights Practices
4.2	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also 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 2022 Methodology document for the sector concerned. 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

A. Governance and Policy Commitments (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: General HRs commitment: The Human Rights policy states that 'The Company respects human rights and freedoms in accordance with the recognized standards, principles, initiatives and provisions of international law, and operates under the regulations set forth in the Russian Federation and other countries across the Company's footprint'. [Human Rights Policy, 29/11/2021: nornickel.com] Score 2 <ul style="list-style-type: none"> Not Met: Commitment to UNGPs: The HR policy also indicates that 'takes into account of and is based on [...] the UN Guiding Principles on Business and Human Rights'. However, 'taking into account' and being 'based on' are not considered formal statements of commitment according to CHRB wording criteria. Similar wording is used in other policy documents. [Human Rights Policy, 29/11/2021: nornickel.com] Not Met: Commitment to OECD MNE Guidelines
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental Principles and Rights at Work	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Commitment to ILO core principles: See below, the Company is committed to rights covering each ILO core area. [Human Rights Policy, 29/11/2021: nornickel.com] & [Code of business ethics, 2012: nornickel.com] Met: Explicitly lists all four ILO core principles: The HR policy states that 'The Company [...] do not use child labor [...] and do not engage persons less than 15 years of age to work at non-hazardous production facilities'. it also adds that 'The Company [...] recognize the right of their employees to freedom of associations,

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			<p>setting up professional unions and joining them to secure protection of their interests, and respects the employees' collective bargaining rights'. 'Employees of the Company [...] are aware that they must treat their colleagues and job candidates with respect, and shall not tolerate discrimination [...]. In addition, the Code of business ethics affirms that 'we strictly obey by the principles of the prevention of any form of discrimination and forced labor'. [Human Rights Policy, 29/11/2021: nornickel.com] & [Code of business ethics, 2012: nornickel.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects BPs/JVs to commit to ILO core principles: See below, the Company has requirements for business partners covering each ILO core area. [Supplier code of conduct, 07/10/2021: nornickel.com] • Met: Explicitly lists all four ILO core principles for BPs/JVs: The supplier code 'applies to all of Nornickel's suppliers, contractors and subcontractors [...] in the supply chain of raw materials, goods, works and services'. It then requires that 'suppliers must prevent any form of forced labour, human trafficking or modern slavery'; 'suppliers must prevent child labour in their operations as well as their own supply chain'; 'suppliers must prohibit any discrimination or persecution [...] suppliers should implement effective and adequate human resources policies and procedures to prevent discrimination and harassment and ensure fair and transparent recruitment practices'; 'suppliers must guarantee their employees the right to join a trade union, the right to strike and the right to representation through a trade union in collective bargaining'. [Supplier code of conduct, 07/10/2021: nornickel.com]
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	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"> • Met: Commitment to respect H&S of workers: The Health and Safety policy states that 'The Company is committed to: ensuring compliance with federal and regional laws and regulations, international agreements, and industry standards and rules governing the Company's occupational health and safety activities [...] managing risks related to occupational health and safety, carrying out special assessments of working conditions and developing and implementing programmes based thereon with a view to preventing workplace accidents and occupational diseases'. • Not Met: Commitment to ILO working hours standards or 48 hour regular work week: The working conditions policy stipulates that 'the working week must not exceed 40 hours [...] and every employee is entitled to a minimum uninterrupted rest period of 42 hours per week'. 'Employees may be requested to work overtime (only subject to their written consent, unless permitted otherwise by the applicable labour laws of Russia, when employees may be required to work overtime without their consent)'. In addition, to the possibility of overtime work taking place without consent, no evidence was found in relation to overtime hours being paid at a premium rate. [Working conditions policy, 18/09/2017: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Expects BPs/JVs to commit to H&S of workers: The supplier code requires that 'suppliers must create a safe and healthy workplace and working environment and protect the general public against any negative health and safety impact resulting from their operations [...]'. [Supplier code of conduct, 07/10/2021: nornickel.com] • Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week: The supplier code states that 'working hours, wages, overtime payments, leave and benefits for all employees, including student workers and interns, must meet or exceed legal requirements and be paid on time'. However, no evidence found of a requirement to either respect ILO conventions on working hours to a maximum of 48 hours of regular working week (if local legislation is not stricter) and overtime to be voluntary and paid at a premium rate. [Supplier code of conduct, 07/10/2021: nornickel.com]
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (EX)	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"> • Not Met: Commitment to respect land ownership/natural resources as in VGGT: No evidence was found of a formal statement of commitment to respect land ownership and natural resources as set out in the Voluntary Guidelines on the Responsible Governance of Tenure. • Not Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards: The Human Rights policy states that 'The Policy also takes account of and is based on the [...] International Finance Corporation's (IFC's) Performance Standards on Environmental and Social Sustainability'. However, 'take into account' and 'based on' are not considered formal statements of commitment according to CHRB wording criteria. Similar statements appear in other policies.

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>[Human Rights Policy, 29/11/2021: nornickel.com] & [Indigenous Peoples' Rights Policy, 44529: nornickel.com]</p> <ul style="list-style-type: none"> • Not Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Indigenous peoples' rights policy states that 'The Company fully shares the principles established in Article 7, Convention No 169 of the International Labour Organization whereby indigenous peoples "shall have the right to decide their own priorities for the process of development as it affects their lives, beliefs, institutions and spiritual well-being and the lands they occupy or otherwise use, and to exercise control, to the extent possible, over their own economic, social and cultural development." This Policy determines the Company's key commitments regarding indigenous peoples' rights and includes accomplishment of the following objectives: respect indigenous lands; support the traditional natural resource use of indigenous peoples; assist in preserving the intangible cultural heritage of indigenous peoples [...].' However, 'sharing the principles' is not considered a statement of commitment by CHRB. Furthermore, the commitments presented by the Company are not clearly indicating respecting indigenous peoples' rights. [Indigenous Peoples' Rights Policy, 44529: nornickel.com] & [Human Rights Policy, 29/11/2021: nornickel.com] • Not Met: Expects EX BPs to make these commitments: The Indigenous peoples' rights policy states that 'The Group also expects its contractors and suppliers to comply with the principles and provisions hereof'. In addition, the supplier code states that 'suppliers must treat local and indigenous communities and lands with respect and dignity, help preserve indigenous traditions and support indigenous practices of using natural resources [...] suppliers must prevent the involuntary resettlement of local communities and any unlawful use of land, forests and waters'. However, no evidence found of a requirement for business partners to respect the rights to land and resources as set out in the Voluntary Guidelines on the Responsible Governance of Tenure or the IFC Performance Standards. [Indigenous Peoples' Rights Policy, 44529: nornickel.com] & [Supplier code of conduct, 07/10/2021: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing: The Indigenous peoples' rights policy states that 'The Company [...] confirms their readiness to ensure the implementation of the principle of free, prior and informed consent (FPIC) of indigenous peoples in applicable cases'. However, a 'readiness to ensure the implementation' is not considered a statement of commitment to obtain FPIC by CHRB. [Indigenous Peoples' Rights Policy, 44529: nornickel.com] & [Human Rights Policy, 29/11/2021: nornickel.com] • Not Met: Commitment to respect the right to water: The Position Statement on water stewardship indicates that 'we commit to developing and applying a strong and transparent corporate water management system and collaborating with stakeholders and local communities in the Company's regions of operation to ensure water security and sanitation'. However, the Company only refers to "clean water that is suitable for fishing" as a human right, which is not recognising the full scope of the human rights to water. no mention of the right to access to safe drinking water was found. A commitment to 'develop and apply a management system' and 'collaborate with stakeholders and communities' is not equivalent to a commitment to respect the right to water. [Position Statement on Water Stewardship, 29/11/2021: nornickel.com] • Not Met: Expects EX BPs to make these commitments: The Indigenous peoples' rights policy states that 'The Group also expects its contractors and suppliers to comply with the principles and provisions hereof'. In addition, the supplier code states that 'suppliers must recognise and apply the process of free, prior and informed consent of indigenous peoples before implementing any project in the territories of traditional living and economic activities of local indigenous groups'. In addition, although the supplier code contains provisions regarding water stewardship, no specific requirement was found in relation to respecting the right to water. [Supplier code of conduct, 07/10/2021: nornickel.com]
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)	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"> • Not Met: Commitment to Voluntary Principles on Security and HRs: The Human Rights Policy states that 'The Policy also takes account of and is based on the [...] Voluntary Principles on Security and Human Rights (VPSHR)'. However, 'take into account' and 'based on' are not considered formal statements of commitment according to CHRB wording criteria. Similar statement formulations are placed in other Company policies. The policy also indicates that 'If state-run or private security agencies are contracted to maintain security and protect the production facilities, the Company [...] shall be guided by the Voluntary Principles on Security

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			and Human Rights'. However, as indicated above, 'shall be guided by' is not considered a formal statement of commitment. [Human Rights Policy, 29/11/2021: nornickel.com] & [Community Engagement Policy, 29/11/2021: nornickel.com] <ul style="list-style-type: none"> • Not Met: Uses only ICoCA members as security providers • Not Met: Commits to International Humanitarian Law Score 2 <ul style="list-style-type: none"> • Not Met: Expects EX BPs to commit to these rights: The supplier code of conduct states that 'suppliers must ensure that any engagement of security forces is in line with the Voluntary Principles on Security and human Rights'. It also indicates that 'suppliers must prevent any forms of serious human rights abuses or violations, including [...]serious violations of international humanitarian law'. No evidence found, however, of a specific requirement of commitment to International Humanitarian Law. [Supplier code of conduct, 07/10/2021: nornickel.com]
A.1.4	Commitment to remedy	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Commitment to remedy adverse HRs impacts: The Human rights policy states that 'The Company and NN RBUs shall provide to stakeholders access to an application submission and review mechanism allowing to settle and providing legal remedy against complaints and proposals related to the Company, NN RBUs, and their operations'. No evidence found of a general statement of commitment to remedy any adverse impacts that it has caused or contributed to. Current evidence seems to focus in processes channelled through a complaint mechanism. [Human Rights Policy, 29/11/2021: nornickel.com] • Met: Expects EX BPs to make this commitments: The supplier code states that 'suppliers must implement processes to remedy adverse impacts on human rights resulting from their operation or contribution'. [Supplier code of conduct, 07/10/2021: nornickel.com] Score 2 <ul style="list-style-type: none"> • Not Met: Commitment to collaborate with judicial or non-judicial mechanisms • Not Met: Commitment to work with EX BPs on remedy
A.1.5	Commitment to respect the rights of human rights defenders	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Zero tolerance of threats/attacks on HRDs: See below. Although the Company requires respecting human rights defenders to its business partners, no evidence found of the Company itself committing to not tolerating threats or attacks on human rights defenders. • Not Met: Expects BPs to make this commitment: The Responsible sourcing policy states that 'Nornickel is committed to respecting human rights [...] and the rights of human rights defenders [...] across its supply chains'. The supplier code also indicates that 'suppliers must have effective and adequate policies in place to demonstrate their commitment to respecting human rights and human rights defenders'. However, this subindicator looks for an explicit requirement to not tolerate attacks or threats to human rights defenders. [Responsible sourcing policy, 07/10/2021: nornickel.com] & [Supplier code of conduct, 07/10/2021: nornickel.com] Score 2 <ul style="list-style-type: none"> • Not Met: Commitment to working with HRDs to create safe and enabling environment

A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Board level responsibility for HRs: The Company's board has a Sustainability and Climate Change Committee that 'Monitors the quality and efficiency of implementing material amendments to the approved strategies, goals, programs, projects and other significant human rights initiatives.' [Human Rights Policy, 29/11/2021: nornickel.com] • Not Met: Describes HRs expertise of Board member Score 2 <ul style="list-style-type: none"> • Not Met: Board member/CEO signal importance of HRs in their communications: The Vice-president for Investors and Sustainable Development made a statement discussing why human rights matter to the business, however, no communication from the CEO or board member about this topic was found. [Human Rights webpage: nornickel.com]

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A.2.2	Board responsibility	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Process to review HRs strategy at board level: The Company's human rights policy states that the Company's Board of Directors' Sustainability and Climate Change Committee has the following responsibilities: 'Provides to the Board of Directors opinions on the assessment of the efficiency and quality of key human rights projects development and implementation. Monitors the quality and efficiency of implementing material amendments to the approved strategies, goals, programs, projects and other significant human rights initiatives. Prepares recommendations for the Board of Directors on achieving compliance with regulatory or legislative enactments, requirements of human rights standards and associations.' [Human Rights Policy, 29/11/2021: nornickel.com] Not Met: Example of HRs issues/trends discussed in last reporting period Score 2 <ul style="list-style-type: none"> Not Met: Meets both requirements under score 1 Not Met: Describes how affected stakeholders / HRs experts inform board discussions
A.2.3	Incentives and performance management	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: At least one board member incentive linked to HRs commitments Not Met: Incentive scheme linked to key HRs risks beyond employee H&S Score 2 <ul style="list-style-type: none"> Not Met: Performance criteria linked to HRs made public Not Met: Review of other board incentives for coherence with HRs policies
A.2.4	Business model strategy and risks	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not Met: Board process to review business model and strategy for HRs risks Not Met: Describes frequency and triggers for reviewing business model Score 2 <ul style="list-style-type: none"> Not Met: Meets both requirements under score 1 Not Met: Example of actions resulting from reviews

B. Embedding Respect and Human Rights Due Diligence (25% of Total)

B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Score of 1 on A.1.2.a Met: Senior responsibility for HRs implementation and decision making: The Company indicates that the Senior Vice President for Sustainable Development 'develops, monitors and coordinates the implementation of the Company's sustainable development policy. Monitors the internal procedures, policies, organizational structure and business processes of the Company to establish compliance with the international standards on sustainable development and requirements of the international human rights associations and certifications.' [Human Rights Policy, 29/11/2021: nornickel.com] Score 2 <ul style="list-style-type: none"> Met: Describes day-to-day responsibility for implementing HRs commitments: The Company lists a range departments of involved in human rights 'governance', such as the Sustainable Development, Accounting, Marketing, Economic, and Occupational Health and Safety (OHS) Departments. It also lists their respective responsibilities. For example, the OHS department participates in human rights risk management and stakeholder engagement within its functional responsibility area. The same also applies to the Corporate Security Department, which further 'Organises and controls safety and security, monitors the social situation at the Company's production divisions and takes part in organising activities to promote work team stability.' [Human Rights Policy, 29/11/2021: nornickel.com] Not Met: Day-to-day resources and expertise allocation in own operations Not Met: Resources and expertise allocation with EX BPs
B.1.2	Incentives and performance management	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Senior manager incentives linked to HRs commitments: The Company states that: 'Remuneration payable to senior management is comprised of basic salary and bonuses. Bonuses are linked to Nornickel's performance, including both financial (EBITDA) and non-financial metrics (work related injury rate, zero environmental incidents, and work plan)'. The Company adds in its Human Rights

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			<p>Report that 'To integrate the engagement principle into sustainable development management, in particular as regards human rights, health and safety indicators linked to FIFR were included in the annual team KPIs of the top management (with a relative weight of 30%).The Company also put in place incentives linked to the Company's human rights commitments and targets for managers and white-collar employees'. [2021 Annual Report, 2022: ar2021.nornickel.com] & [2022 Human Rights Report, 2022: nornickel.com]</p> <ul style="list-style-type: none"> • Not Met: Incentive scheme linked to key HRs risks beyond employee H&S <p>Score 2</p> <ul style="list-style-type: none"> • Met: Performance criteria linked to HRs made public: The Company indicates that 'Work-related injury rate' correspond to 5% of the non-financial metrics. [2021 Sustainability report, 2022: nornickel.com] • Not Met: Review of other senior management incentives for coherence with HRs policies
B.1.3	Integration with enterprise risk management	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"> • Not Met: HRs risks integrated as part of enterprise risk system: The Company indicates that one of its head office departments, the Risk Management Service, 'Monitors delivery of actions aimed at managing the key risks, including those identified while interacting with the stakeholders with regard to human rights observance and protection.' The department also 'Provides PJSC MMC Norilsk Nickel Management Board's Risk Management Committee with consolidated information on managing the key risks, including those identified while interacting with the stakeholders with regard to human rights observance and protection.' While 'human rights' are not mentioned as one of the 'Key sustainability risks' in the 'Structure of the risk management framework,' the Company does refer to 'occupational health and safety' and 'social and labour relationships' specifically. [Human Rights Policy, 29/11/2021: nornickel.com] & [2021 Sustainability report, 2022: nornickel.com] • Not Met: Provides an example <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Risk assesment by Audit Committee or independent third party: The Company states that its Audit Committee is responsible for: reviewing and approving the risk management development roadmap and assessing its implementation status (annually); reviewing reports on strategic and key risks (annually/quarterly); assessing risk management performance at Nornickel (annually). It is also indicated that the Company applies an internal audit process, which makes independent assessments of the effectiveness of risk management, internal controls and corporate governance (annually). However, the Company indicates that the integration of human rights risks into the corporate risk management system is still in progress. [2022 Annual Report: nornickel.com]
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	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"> • Met: Score of 1 on A.1.2.a • Not Met: Communicates HRs policies to all workers in own operations: The Company indicates that to ensure that employees understand and accept the principles and fundamentals of the updated Business Ethics Code, which covers human rights, it continues to offer its employees training programmes explaining the Code (a training module on the Code was integrated into the Our Values programme, Nornickel Live, and Corporate Dialogues), and by the end of 2022, the programmes covered 80% of the Company's total headcount. However, no information related to different languages was found. [2022 Sustainability Report: nornickel.com] & [Code of business ethics, 2012: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Communicates HRs policies to stakeholders: The Company indicates in the Human Rights Policy that 'The Company is also proactively communicating the Policy to stakeholders using other relevant communication channels.' However, no description of how it communicates its policy commitments to affected stakeholders was found. [Human Rights Policy, 29/11/2021: nornickel.com] • Not Met: Example of how HRs policies are accessible for intended audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	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"> • Met: Meets ILO requirement for suppliers on A.1.2.a • Not Met: Describes steps to communicate HRs policies to EX BPs: The Company indicates in its Human Rights Policy, which comprises suppliers and contractors, that 'Suppliers should support relevant international standards and organizations and publicly communicate that they do not tolerate serious human rights abuses in their operations or supply chain' and 'Suppliers must raise awareness and provide

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>training to their employees and relevant external stakeholders to eliminate serious human rights abuses within their operations and the local communities'. However, it is not clear how the Company communicates its Human Rights Policy. [Human Rights Policy, 29/11/2021: nornickel.com]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes how HRs policies are contractual/binding for suppliers: The Company indicates that 'To ensure ESG-compliant sourcing across Nornickel's supply chains, suppliers are required to adhere to the Code' and that 'If the Suppliers refuse to follow the Code's requirements or do not exhibit continuous improvement with respect to such compliance, Nornickel may review its relations with such suppliers'. The Code includes a Human Rights section and applies to contractors and subcontractors. The Company adds in its Human Rights Report that 'In 2022, a provision on ESG compliance, which inter alia includes human rights, was added to 1,313 contracts and master agreements with suppliers'. [Supplier code of conduct, 07/10/2021: nornickel.com] & [2022 Human Rights Report, 2022: nornickel.com] • Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs: The Company indicates in its Supplier Code of Conduct, which comprises suppliers, contractors, and subcontractors, that 'Suppliers must prevent human rights abuses or violations in their businesses and across their supply chains.' and that 'Suppliers should support relevant international standards and organizations and publicly communicate that they do not tolerate serious human rights abuses in their operations or supply chain'. However, no information related to binding requirements was found. [Supplier code of conduct, 07/10/2021: nornickel.com]
B.1.5	Training on Human Rights	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"> • Met: Score of at least 1 on A.1.2.a • Not Met: Describes how workers are trained on HRs policy commitments: The Company stated that in 2022, it proceeded with its previously established plans to deliver basic training on human rights to the employees of the relevant units of the Head Office and companies/units of its divisions. The Company also describes some of the topics addressed. However, it is not clear if this training was provided for all workers. [2022 Sustainability Report: nornickel.com] • Not Met: Trains relevant managers including security on HRs: The Company indicates that it also organized a standalone seminar for HR teams and relevant training for the Corporate Security employees to ensure compliance with the Voluntary Principles on Security and Human Rights (VPSHR). However, it is not clear if this included managers. [2022 Sustainability Report: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a • Not Met: Meets both requirements under score 1 • Not Met: Trains BPs to meet HRs commitments: The Company indicates that it provides responsible supply chain training for employees of the Company's Head Office and the Group companies, as well as for mineral feedstock suppliers. The Company adds in the Responsible Supply Chain Report that 'the Group's trainings in 2021–2022 conducted at Kola MMC, Polar Division, Medvezhy Ruchey LLC and GRK Bystrinskoye actually covered employees of these entities as mineral suppliers...The principles underlying responsible supply chains and the use of DDMS tools are also covered by internal workshops and training sessions on other matters, such as human rights or environmental, social and corporate governance (ESG) practices'. However, it is not clear if this applies to all extractive partners. [2022 Sustainability Report: nornickel.com] & [2022 Responsible Supply Chain Report, 2023: nornickel.com] • Not Met: Discloses % suppliers trained
B.1.6	Monitoring and corrective actions	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"> • Met: Score of at least 1 on A.1.2.a • Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: In its supplier code, the Company indicates that it 'conducts regular assessments of suppliers' conformance with the requirements set out in the Code, which may include audits of supplier sites.' The supplier has a section on Human Rights that applies to contractors and sub-contractors. The Company also describes the measures aimed at monitoring and assessing the implementation of the Human Rights Policy. Further, the Company indicates that this Policy 'applies to all the Norilsk Nickel Group business units in which the Company directly or indirectly owns more than 50% of the authorized capital. The Company adds in its Human Rights Report that 'In 2022, internal audits reported no incidents of child or forced labour' and that 'To monitor suppliers' compliance with the requirements of the

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Supplier Code of Conduct and select the best suppliers based on the ESG criteria, Nornickel has introduced a special due diligence management system that helps assess suppliers against the ESG criteria, including those in human rights, and also check the extent of the suppliers' compliance.' [Supplier code of conduct, 07/10/2021: nornickel.com] & [Human Rights Policy, 29/11/2021: nornickel.com]</p> <ul style="list-style-type: none"> • Not Met: Discloses % of EX BP's monitored • Not Met: Describes how workers are involved in monitoring <p>Score 2</p> <ul style="list-style-type: none"> • Met: Score of 2 on A.1.2.a • Not Met: Describes corrective actions process • Not Met: Discloses findings and number of correction action processes
B.1.7	Engaging and terminating business relationships	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"> • Not Met: HRs performance affects selection EX BPs: The Company indicates that the Responsible Sourcing Policy 'covers all of Nornickel's sourcing activities related to the selection of suppliers, contractors and subcontractors ("Suppliers") in the supply chain of raw materials, goods, works and services' and this policy comprises human rights. The Company adds in its Human Rights Report that 'To monitor suppliers' compliance with the requirements of the Supplier Code of Conduct and select the best suppliers based on the ESG criteria, Nornickel has introduced a special due diligence management system that helps assess suppliers against the ESG criteria, including those in human rights, and also check the extent of the suppliers' compliance'. However, it is unclear if this applies to all potential business relationships, including suppliers. [Responsible sourcing policy, 07/10/2021: nornickel.com] & [2022 Human Rights Report, 2022: nornickel.com] • Not Met: HRs performance affects ongoing BPs relationships: The Company indicates that 'As part of its commitment to responsible business practices, Nornickel aims to develop long-term relationships with its suppliers based on shared values and common goals. This implies that Nornickel's suppliers adhere to principles that are consistent with those set forth in this Supplier Code of Conduct' and that 'If the Suppliers refuse to follow the Code's requirements or do not exhibit continuous improvement with respect to such compliance, Nornickel may review its relations with such suppliers'. The Code covers Human Rights and applies to (sub)contractors also. However, it is unclear whether suppliers' human rights performance impacts decisions to renew, expand or terminate business relationships. [Supplier code of conduct, 07/10/2021: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes positive HRs incentives for business relationships • Not Met: Works with EX BPs to meet HRs requirements: The Company states in the Supplier Code of Conduct that 'In the spirit of open and constructive dialogue, Suppliers are encouraged to reach out to ask questions if clarifications are needed and to inform Nornickel of any challenges or barriers they may face' and the Code comprises human rights. However, the Company does not disclose proactively working with extractive business partners to support them in meeting its human rights commitments. [Supplier code of conduct, 07/10/2021: nornickel.com]
B.1.8	Approach to engagement with affected stakeholders	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"> • Not Met: Describes how workers and communities identified and engaged in the last two years: It is indicated that the 'The Company and NN RBUs identify groups of stakeholders, including local communities and minor indigenous peoples (MIP), and foster long-term relations with them based on respect and trust to promote mutual benefit and well-being.' Stakeholders are defined as follows: 'individuals and legal entities, as well as groups and associations and other organizations external to the Company whose interests may be affected by the Company's activities, as well as parties that may influence the Company'. The Company describes the engagement with stakeholders in the Stakeholder Engagement Policy. For example, it notes that it 'shall take into account stakeholders opinions, maintain regular communication, request and provide feedback and consult with key stakeholders in good faith concerning issues related to the Company, including the ESG issues.' However, the Company does not describe how it has identified and engaged with affected stakeholders, including workers amongst its extractive business partners or local communities, in the last two years. [Human Rights Policy, 29/11/2021: nornickel.com] & [Stakeholder Engagement Policy, 29/11/2021: nornickel.com] • Not Met: Discloses stakeholders whose HRs may be affected • Not Met: Provides two examples of engagement with stakeholders <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Analysis of stakeholder views on company's HRs issues

Indicator Code	Indicator name	Score (out of 2)	Explanation
			• Not Met: Describes how stakeholders views influenced company's HRs approach

B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	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"> • Not Met: Describes process of identifying risks in own operations: The Company states that 'Based on analysis of submitted documents and more than 100 interviews with the Company's employees and stakeholders, we identified key risks and impacts by the type of relevant human rights. Nornickel's exposure to human rights risks in Russia is limited. The key focus areas are occupational health and safety and environmental impact. Risks related to local communities and safety are limited in the majority of cases'. However, it is not clear if the Company's process takes into consideration specific locations and activities. [2022 Human Rights Report, 2022: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process for identifying risks in EX BPs: The Company states that it introduced a Supply Chain Due Diligence Management System to identify and mitigate a variety of risks, including the risk of violating human rights and freedoms. It also indicates that the system focuses primarily on identifying potential risks that could impact the stability and transparency of mineral supply chain processes. However, no evidence that this process comprises all of its extractive business partners, and not only mineral suppliers, was found. [2022 Sustainability Report: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes global risk identification system incl. stakeholder consultation • Not Met: Describes how risk identification system is triggered by new circumstances • Not Met: Describes risks identified in relation to new circumstances
B.2.2	Assessing 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"> • Not Met: Describes assessment process and discloses salient HRs risks: The Company indicates that 'In 2022, Nornickel held a preliminary human rights impact assessment. An outline assessment of business and human rights risks in the Company's main jurisdictions was undertaken at the head office and division levels and involved interviews with employees and reviews of by-laws conducted by an independent expert organisation'. However, no description of how relevant factors are taken into account was found. [2021 Sustainability report, 2022: nornickel.com] • Not Met: Describes how process applies to EX BPs: The Company states that 'Nornickel has introduced a special due diligence management system that helps assess suppliers against the ESG criteria, including those in human rights'. However, no further description of the process was found. [2022 Human Rights Report, 2022: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Public disclosure of results of HRs risk assessment <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how assessment involved affected stakeholders
B.2.3	Integrating and acting on human rights risks and impact assessments	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"> • Not Met: Describes system to prevent, mitigate and remediate HRs issues • Not Met: Describes how global system applies to EX BPs • Not Met: Example of actions decided on at least 1 salient HRs issue <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Describes how stakeholders involved in decisions about actions taken
B.2.4	Tracking the effectiveness of actions to respond to 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"> • Not Met: Describes system for evaluation effectiveness of actions • Not Met: Example of lessons learned from evaluation effectiveness of actions <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Involves stakeholders in evaluation effectiveness of actions
B.2.5	Communicating on human rights 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"> • Not Met: Provides two examples of comms with stakeholders

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> • Not Met: Describes challenges to effective comms and how it is working to address them

C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all workers: The Company has a Corporate Trust Line that 'handles reports on both potential corruption and a wider range of matters related to violations of procedures and by-laws, including with respect to human rights, environment, labour relations, etc' and can be contacted by phone or email. [2021 Sustainability report, 2022: nornickel.com] Score 2 <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and workers made aware • Met: Describes how workers in EX BPs access grievance mechanism: The Company indicates in the Supplier Code of Conduct that 'The Code includes a chapter on implementation guidance for suppliers as well as a reference to the established grievance mechanism that can be used by suppliers to report violations or concerns pertaining to the Code'. As the Code 'applies to all of Nornickel's suppliers, contractors and subcontractors' is considered to apply to extractive business partners. [Supplier code of conduct, 07/10/2021: nornickel.com] • Not Met: Expects EX BPs to convey expectation to their BPs
C.2	Grievance mechanism(s) for external individuals and communities	1.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Grievance mechanism accessible to all external individuals and communities: The Company states that 'Any stakeholder may contact the Corporate Trust Line.' [2021 Sustainability report, 2022: nornickel.com] Score 2 <ul style="list-style-type: none"> • Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware • Met: Describes how external individuals/communities access grievance mechanism: The Company indicates in the Supplier Code of Conduct that 'Employees, Suppliers and the general public must be informed of the existence of a grievance mechanism to report any misconduct and adverse impacts deriving from business operations'. As the Supplier Code of Conduct 'applies to all of Nornickel's suppliers, contractors and subcontractors' this statement is considered to apply to extractive business partners. [Supplier code of conduct, 07/10/2021: nornickel.com] • Not Met: Expects EX BPs to convey expectation to their BPs
C.3	Users are involved in the design and performance of the mechanism(s)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes how users engaged on design and performance • Not Met: Provides user engagement examples (at least two) on design and performance Score 2 <ul style="list-style-type: none"> • Met: Describes how users engaged on improvement of mechanism: The Company states that 'In 2022, we held discussions with stakeholders on options for improving the corporate Grievance Mechanism. Having assessed the human rights impact, external experts recommended that the Mechanism be updated and stakeholders provided with an effective access to an independent expert review to obtain a full, credible, and objective third-party (independent) decision.' [2022 Sustainability Report: nornickel.com] • Not Met: Provides user engagement examples (at least two) on improvement
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Describes procedure and timescales for managing complaints or concerns: The Company describes the framework for registering and reviewing reports and indicates that 'The procedure provides for the operator to fully handle the report (from registration in the information system to review by a dedicated function and assessment of response by the Head of the Corporate Trust Line) within 21 days'. The Company also indicates that 'If the report is found substantiated, a set of control measures is taken, and if a violation is confirmed, steps are taken to correct the situation, eliminate any negative consequences, and inform stakeholders'. [2022 Sustainability Report: nornickel.com] • Not Met: Describes technical, financial, advisory support to enable equal access

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describe types of outcome to complainant through use of mechanism • Not Met: Describes escalation to senior levels / independent adjudicators
C.5	Prohibition of retaliation for raising complaints or concerns	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"> • Not Met: Public statement prohibiting retaliation against workers/stakeholders: The Company states that 'Nornickel will in no circumstances retaliate against an employee who raises a concern via the Corporate Trust Line, meaning that no disciplinary action or sanction will be taken (dismissal, demotion, forfeiture of bonuses, etc.).' However, it is not clear if the same applies to other stakeholders. [2022 Annual Report: nornickel.com] • Met: Describes practical measures to prevent retaliation: The Company guarantees anonymity and confidentiality for whistle-blowers and respondents. [2021 Sustainability report, 2022: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Specifies no legal action, firing or violence • Not Met: Expects EX BPs to prohibit retaliation against workers/stakeholders
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	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"> • Not Met: Complainants not asked to waive legal rights • Not Met: Does not require confidentiality provisions <p>Score 2</p> <ul style="list-style-type: none"> • Met: Cooperates with state based non judicial mechanisms: The Company states that 'The Company is committed to using the Corporate Trust Service and the Freedom of Association complaint management mechanism [...]. However, using the Corporate Trust Service (CTS) does not deprive employees of access to judicial or other non-judicial complaint management mechanisms. The Company shall respond to employee complaints respectfully and in good faith by providing timely constructive feedback on freedom of association and related rights issues.' [Freedom of Association Policy, 29/11/2021: nornickel.com] • Not Met: Example of issue resolved (if applicable)
C.7	Remedying adverse 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"> • Not Met: Describes approach taken to remedy adverse HRs impacts • Not Met: Describes how remedy would be provided if no adverse impact identified <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes changes to systems, processes and practices to prevent future impacts • Not Met: Describes approach to monitoring/implementing agreed remedy • Not Met: Describes approach to learning from incidents if no adverse impacts identified
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	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"> • Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The Company discloses that 'In 2022, the Corporate Trust Line received 1,463 reports, with 589 accepted for review, 556 resolved and released from control (out of which 159 were confirmed and 397 not confirmed). Most reports had to do with labour relations and commercial and contractual activities. As at 1 January 2022 and 31 December 2022, 70 and 103 reports were at the processing stage, respectively.' The Company also discloses the reports received by type and it had 5 reports concerning human rights and freedoms in 2022. [2022 Sustainability Report: nornickel.com] • Not Met: Example of how lessons from mechanism improved HRs management system <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Describes process to evaluate mechanism and changes made as a result: The Company states that 'To monitor the performance of the Mechanism, we collect feedback from complaint initiators and assess the level of satisfaction on an ongoing basis and annually by analysing the feedback received during consultations with stakeholders across the Company's footprint and at the Head Office. In 2022, we held discussions with stakeholders on options for improving the corporate Grievance Mechanism. Having assessed the human rights impact, external experts recommended that the Mechanism be updated and stakeholders provided with an effective access to an independent expert review to obtain a full, credible,

Indicator Code	Indicator name	Score (out of 2)	Explanation
			and objective third-party (independent) decision.' However, it does not indicate any changes made, only recommendations made by stakeholders. [2022 Sustainability Report: nornickel.com] <ul style="list-style-type: none"> • Not Met: Describes procedures to address delays of outcomes agreed with stakeholders

D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Pays living wage or sets time-bound target: The Company states that 'The Company makes regular reviews of pay levels and trends as well as the cost of living – both the nation-wide averages and the average figures for each of its operating regions, with wage indexation done annually based on the review results. [...] The Company constantly evaluates its pay levels to make sure they are not below the established living wage. Monitoring results suggest that all employees at the Company are paid above the minimum living wage.' However, it is not clear whether the Company takes workers' families or dependents into consideration when determining the 'living wage'. [2022 Annual Report: nornickel.com] • Not Met: Describes how living wage determined: The Company indicates that 'The Company makes regular reviews of pay levels and trends as well as the cost of living – both the nation-wide averages and the average figures for each of its operating regions, with wage indexation done annually based on the review results.' However, it is unclear whether the Company takes into consideration the workers' families or dependents. [2022 Annual Report: nornickel.com] Score 2 <ul style="list-style-type: none"> • Not Met: Achieved paying living wage • Not Met: Reviews definition living wage with unions
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Member of EITI: The Company states that it '[...] has been disclosing data under the EITI since 2021', however it is not said if the Company is member of EITI. [2022 Sustainability Report: nornickel.com] • Met: Reports of taxes and revenues beyond legal minimums: The Company discloses 'Payments to government authorities in 2021 by country' and '2021 tax payments by country'. [2021 Annual Report, 2022: ar2021.nornickel.com] & [2021 Sustainability report, 2022: nornickel.com] Score 2 <ul style="list-style-type: none"> • Met: Reports taxes and revenue by country: See above. The Company discloses payments and taxes by country. The Company states that discloses information 'in line with EITI requirements' and that 'Nornickel participates in the tax monitoring system, which provides tax authorities with real-time access to the Company's tax and accounting data and eliminates the need for inspections. By giving tax authorities direct access to its corporate accounting system, the Group clearly demonstrates its highly professional and ethical approach to tax matters'. [2021 Annual Report, 2022: ar2021.nornickel.com] & [2021 Sustainability report, 2022: nornickel.com]
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Measures to prohibit violence/retaliation against workers for joining trade union • Met: Discloses % of total direct operations covered by CB agreements: The Company indicates that it '[...] maintains a well-developed social partnership framework, with collective agreements covering 94.4% of the workforce. The Group companies are parties to a total of 23 collective bargaining agreements. As at the end of 2022, 7.4% of the Company's employees were members of trade unions, while 77% were represented by social and labour councils.' [2022 Sustainability Report: nornickel.com] Score 2 <ul style="list-style-type: none"> • Not Met: Meets both requirements under score 1

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own extractive operations, which includes JVs)	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"> • Not Met: Describes process to identify H&S risks and impacts: The Company states that 'Nornickel has developed and implemented a standard for the identification and management of occupational health and safety risks', however, no description of the process to identify H&S risks and impacts was found. [2021 Sustainability report, 2022: nornickel.com] • Met: Discloses injury rate or lost days for last reporting period: The Company states that 'In 2022, the Group had 66 lost time injuries, with lost time injury frequency rate (LTIFR) standing at 0.57.' [2022 Sustainability Report: nornickel.com] • Met: Discloses fatalities for last reporting period: The Company indicates that there were 4 cases of 'Fatal workplace injuries' in 2022. [2022 Sustainability Report: nornickel.com] • Met: Discloses occupational disease rate for last reporting period: The Company indicates that there were 174 cases of occupational diseases in 2022. [2022 Sustainability Report: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Set targets for H&S performance: The Company presents performance targets under the sustainable growth strategy through 2030. This includes 'Lower workplace injury rate' and indicates 'Zero tolerance policy on workplace deaths', however, no general Health and Safety targets were found. [2021 Sustainability report, 2022: nornickel.com] • Met: Met targets or explains why not or actions to improve H&S management systems: The Company describes the circumstances of the fatalities, the responses measures, and states that 'All circumstances of the fatal accidents were reported on to the Board of Directors and thoroughly investigated to avoid them in the future'. [2021 Sustainability report, 2022: nornickel.com]
D.3.5	Indigenous peoples' rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	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"> • Not Met: Process to identify/recognise indigenous rights holders: The Indigenous Policy indicates that 'The Company and NN RBUs conduct regular identification and assessment of potential and actual risks related to the human rights of indigenous peoples and the relevant impact made by the Company and NN RBUs.' However, no information was found on the process the Company applies to identify or recognise indigenous rights holders. [Indigenous Peoples' Rights Policy, 44529: nornickel.com] • Not Met: Describes how indigenous communities are engage during assessment <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commitment to FPIC: The Company states that 'In 2021, Nornickel confirmed its commitment to the Free, Prior and Informed Consent (FPIC) process for indigenous peoples whenever this is applicable, and had this principle included into its updated Indigenous Peoples' Rights Policy.' [2021 Sustainability report, 2022: nornickel.com] • Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: The Company indicates that in 2021 'The Company's first ever free, prior, and informed consent (FPIC) procedure for representatives of indigenous northern minorities in the settlement of Tukhard was launched'. 'The programme, aimed primarily at supporting and developing traditional livelihoods, enhancing housing, social and medical infrastructure in the settlements as well as promoting education, science and culture, was underway. [...] Fine-tuning the formats of interaction with indigenous northern minorities, Nornickel was the first company to launch the Free, Prior and Informed Consent (FPIC) process in the Russian Arctic with respect to the Tukhard relocation and development programme. In order to improve the housing conditions in Tukhard, the Company proposed considering the construction of a new settlement and the residents' relocation thereto. Although the FPIC process is not directly integrated into the national laws of the Russian Federation, Nornickel came up with a solution to address the relocation issue in accordance with the international standards set out in the UN Declaration on the Rights of Indigenous Peoples. Tukhard residents agreed to join the FPIC process subject to certain conditions. These involved decision making on the relocation, choosing the site for their new settlement and determining its social infrastructure, selecting the best architectural designs as part of an architectural competition, as well as participating in all stages of the relocation programme through the elected Council of Representatives of the settlement residents. [...] The Report also states that the Company completed the Free, Prior and Informed Consent (FPIC) process in the Russian Arctic with respect to the Tukhard relocation and development programme.' [2021 Sustainability report, 2022: nornickel.com] & [2022 Sustainability Report: nornickel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.6	Land rights: Land acquisition (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes approach to indentifying lang tenure rights holders and negotiating compensation Score 2 <ul style="list-style-type: none"> • Not Met: Describes approach to compensation including valuation • Not Met: Describes steps to meet IFC PS 5 in state deals
D.3.7	Security (in own extractive operations, which includes JVs)	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: Describes security implementation (incl. VPs or ICOC) and provides an example: The Company states that 'If state-run or private security agencies are contracted to maintain security and protect the production facilities, the Company and NN RBUs shall be guided by the Voluntary Principles of Security and Human Rights and expect their suppliers across the entire supply chain to do the same.' And, it states that 'Nornickel also organised a standalone seminar for HR teams and relevant training for the Corporate Security employees to ensure compliance with the Voluntary Principles on Security and Human Rights (VPSHR).' [Human Rights Policy, 29/11/2021: nornickel.com] & [2022 Sustainability Report: nornickel.com] Score 2 <ul style="list-style-type: none"> • Met: Ensures Business Partners/JVs follow security approach: The Company indicates in the Supplier Code of Conduct that 'Suppliers must ensure that any engagement of security forces is in line with the Voluntary Principles on Security and Human Rights. Suppliers must review and monitor public or private security forces engaged in their operations to ensure that they have not been and are not implicated in or responsible for serious human rights abuses or violations' and that 'Nornickel conducts regular assessments of suppliers' conformance with the requirements set out in the Code, which may include audits of supplier sites'. As the company defines "suppliers" as 'all of Nornickel's suppliers, contractors and subcontractors' this statement is accepted to refer to extractive business partners of the company. [Supplier code of conduct, 07/10/2021: nornickel.com] • Not Met: Security and HRs assessment includes input from local communities • Not Met: Two examples of working with local communities to improve security
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes preventative/corrective action plans for water and sanitation risks: The Company states that 'Nornickel takes a responsible approach to its use of water resources. The Company withdraws water for production needs strictly in line with the pre-approved limits and consistently ensures compliance with permissible wastewater discharge limits based on the Group companies' corporate environmental reporting and its analysis. Nornickel uses water from surface and underground sources for drinking and production needs, as well as for recirculating and recycling water supply. The Company regularly runs observation programmes for water bodies and water protection zones that serve as water sources for Nornickel.' However, there are no mentions to sanitation issues. [2022 Sustainability Report: nornickel.com] Score 2 <ul style="list-style-type: none"> • Not Met: Sets targets on water stewardship that consider water use by local communities: The Company presents water stewardship goals, however, this fails to include water use by local communities and other users. [2021 Sustainability report, 2022: nornickel.com] • Not Met: Reports progress in meeting targets and trends demonstrating progress
D.3.9	Women's rights (in own extractive operations, which include JVs)	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not Met: Describes processes to stop harassment and violence against women • Not Met: Working conditions take into account gender issues • Not Met: Measures and steps to address gender pay gap at all levels of employment Score 2 <ul style="list-style-type: none"> • Not Met: Meets all requirements under score 1 • Not Met: Provides analysis of trends demonstrating closing gender pay gap

E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Right to a safe, clean, healthy and sustainable environment • Headline: NGOs estimate losses caused from May 2020 oil spill at Nornickel's plant in Norilsk at RUB 175.3 million • Story: The Project Office for the Development of the Arctic and the Russian Association of Indigenous Peoples of the North, Siberia, and Far East have estimated losses caused by the May 2020 oil spill at Nornickel's facility to indigenous people in Russia at approximately RUB 175.3 million. On May 29, 2020, a reservoir collapse at the Norilsk Thermal Power Plant No 3 of Nornickel's Norilsko-Taymyrskaya Energeticheskaya Kompaniya (NTEK) reportedly caused a spill of approximately 20,000 tons of diesel fuel. The spilled oil products allegedly contaminated soil and rivers and a lake in Norilsk. The Karskoe Sea could also have been polluted, according to local authorities. The Russian Environmental Protection Agency has estimated the environmental damage due to the accident at approximately RUB 148 billion. According to the joint investigation of the NGOs, the spill has caused difficulties with fishing for local indigenous people in the territory of 88 thousand hectares. The indigenous people of Taimyr have reportedly struggled to access food and their ancestral domain because of the environmental impacts of Norilsk Nickel's decades of pollution. <p>The company also allegedly entered into a controversial agreement with representatives of the indigenous people since they are reportedly paid by Norilsk Nickel. It also reportedly tried to conceal the scope of impacts of its pollution by bribing environmental authorities and blocking independent sources from studying the sites.</p> <p>In March 2021, the company paid a record \$2bn (£1.4bn) fine over a the oil spill. [Tayga Info, 20/12/2020, "Damage to the small peoples of the north from the fuel spill in Norilsk was estimated at 175 million": tayga.info] [The Barents Observer, 29/05/21, "A year after Arctic fuel spill, Norilsk Nickel continues to ignore Indigenous critics": thebarentsobserver.com] [Reuters, 05/10/2020, "Nornickel disputes environmental cost of Arctic fuel spill": reuters.com] [BBC News, 10/03/2021, "Norilsk Nickel: Mining firm pays record \$2bn fine over Arctic oil spill": bbc.com]</p>
E(1).1	The company has responded publicly to the allegation	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"> • Met: Public response: Nornickel said in a statement that its power subsidiary "does not dispute the negative environmental impact of the incident and reiterates its full commitment to do everything that is necessary to completely eliminate all of its negative consequences." [Reuters, 05/10/2020: reuters.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Detailed response: The company responded in very general terms and did not address the allegation in detail.
E(1).2	The company has investigated and taken appropriate action	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"> • Not Met: Engaged with stakeholders: According to the company's website: "Nornickel signed with indigenous organisations a "comprehensive" support package totalling RUB2bn (\$25.42m) over five years. The programme will run until 2024 and includes a range of initiatives aimed at the support of the traditional activities of indigenous peoples as well as environmental protection. The package will also be used to fund housing, medicine, infrastructure, tourism, and educational and cultural projects. Projects that will benefit from funding have been defined with input from local indigenous communities and will be developed in cooperation with indigenous peoples, local governments, and corporations." <p>According to the Barents Observer, the company announced that it has hired community members to serve as Indigenous spokesperson within the company, who say they represent all Indigenous peoples of Taimyr. However, it is unclear if these have been mandated by the affected stakeholders to represent their interests.</p>

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			<p>[Nornickel News, 21/12/2020, "Nornickel's unit to pay compensation to indigenous communities affected by fuel spill": nornickel.com] [The Barents Observer, 29/05/21: thebarentsobserver.com]</p> <ul style="list-style-type: none"> • Not Met: Identified cause: Norilsk Nickel does not present investigative results on the underlying causes of the events concerned. The company has fought repeatedly to block independent sources from inspecting its facilities or taking samples, even after the catastrophic oil spill. [The Barents Observer, 29/05/21: thebarentsobserver.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not Met: Identified and implemented improvements: The company repeatedly pledged to change its conduct and policies. Weeks after the spill, the company unveiled a long-term program to monitor permafrost and remedy environmental damage, saying it now has a greater challenge due to climate change and its impact on the Arctic region. However, there is no evidence that the company has actually implemented such improvement plans. [Radio Free Europe/Radio Liberty, 29/07/2021, "Russian Fisheries Agency Seeks Damages From Metallurgical Giant For Arctic Fuel Spill": rferl.org] • Not Met: Stakeholder input to steps taken
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Provided remedy: According to the Nornickel's website, the company will pay compensation "to 699 members of tribal communities and individuals fishing at Lake Pyasino and the Pyasina River. The list of recipients has been agreed with community representatives and the Russian Association of Indigenous Peoples of the North. The total allocated amount is around RUB 174 mln." [Nornickel News, 21/12/2020: nornickel.com] • Not Met: Evidence for lack of Impact or link <p>Score 2</p> <ul style="list-style-type: none"> • Met: Remedy satisfactory to stakeholders: Norilsk Nickel has pledged to spend 2 billion rubbles on Indigenous programs over the next five years. There is no evidence that indicates the remedy presented is not considered satisfactory by the affected stakeholders. [The Barents Observer, 29/05/21: thebarentsobserver.com] • Not Met: Remedy delivered: Even though the company agreed to provide remedy there is no evidence that the remedy was delivered to the affected stakeholders. • Not Met: Independent remedy process used

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