

Strategic approach

Sustainability governance

Sustainability governance at Nor Nickel is based on a matrix model, with responsibility for implementing environmental, social, and governance (ESG) initiatives distributed among various functions. Key decisions and oversight on most matters in this area rest with the highest governance bodies – the Management Board, the Board of Directors, and their dedicated committees. At the Board level, the Sustainable Development and Climate Change Committee is responsible for overseeing the development and implementation of sustainability practices.

Nor Nickel's operations and strategic planning are based on sustainability principles set out in the Company's internal regulations.

Sustainability governance structure

Sustainable Development and Climate Change Committee

chaired by an independent director

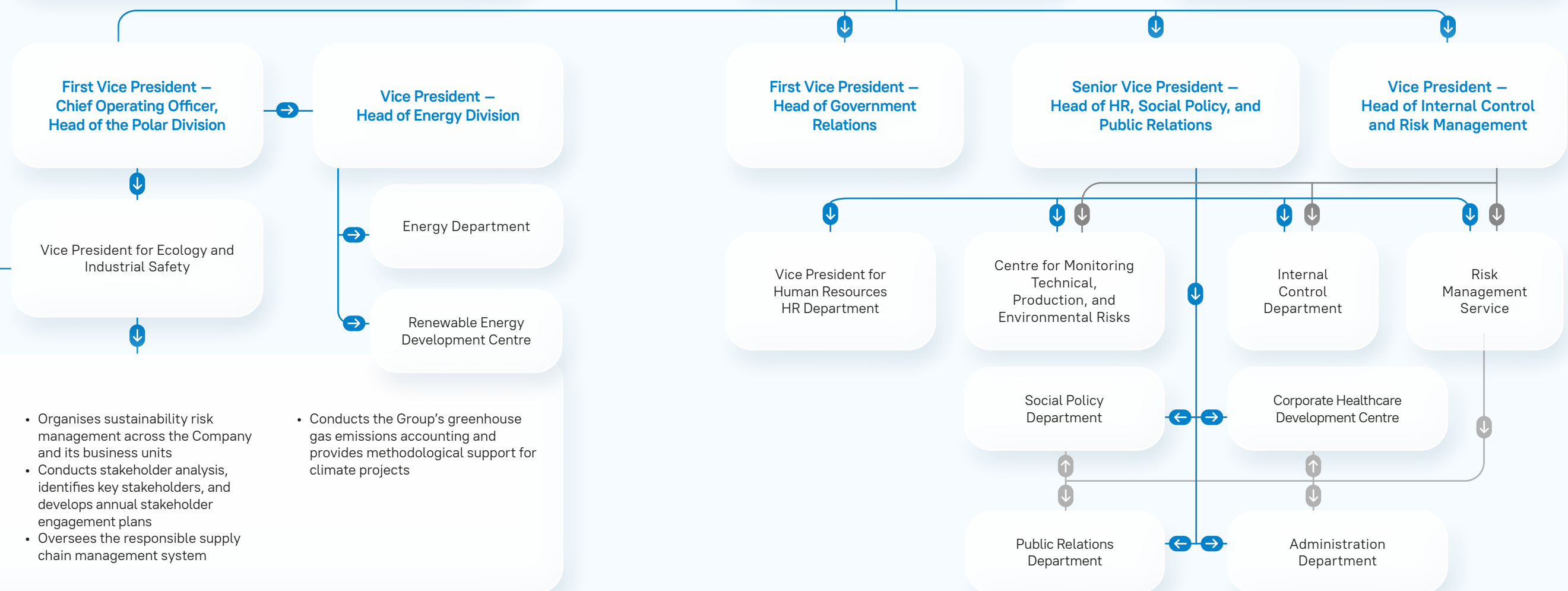
- Monitors the strategy's progress and effectiveness
- Oversees progress on sustainability goals and programmes
- Provides the Board of Directors with an opinion on the effectiveness and quality of designing and implementing key sustainability projects

Board of Directors
Approves the Company's internal documents and strategic goals

Audit Committee
chaired by an independent director

Management Board

Risk Management Committee of the Management Board
chaired by the President of the Company



Sustainable Development Office

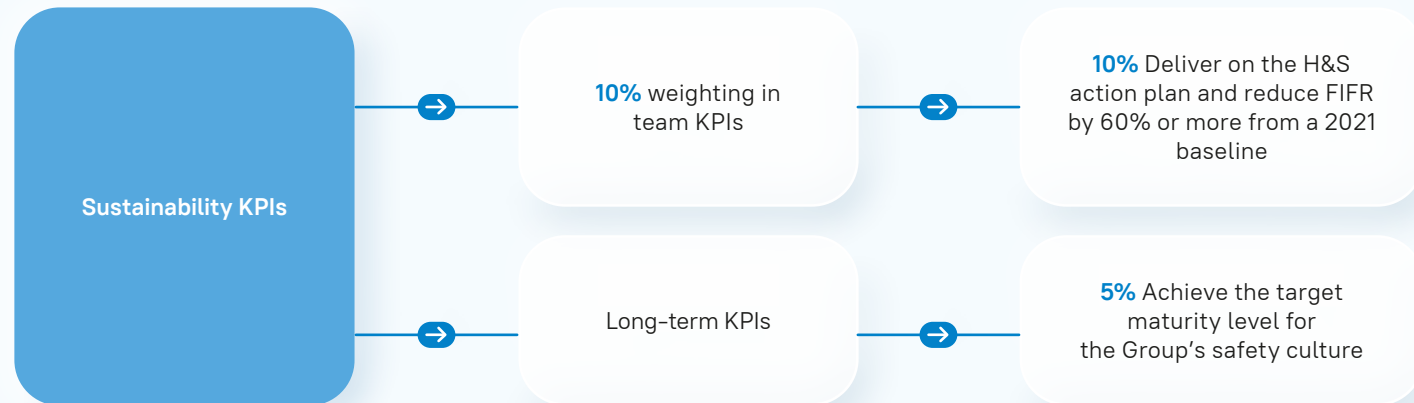
- Contributes to the development of the Company's Development Strategy by aligning it with sustainability
- Ensures the integration of sustainability principles into the Company's operations and the publication of sustainability-related reports

- Organises sustainability risk management across the Company and its business units
- Conducts stakeholder analysis, identifies key stakeholders, and develops annual stakeholder engagement plans
- Oversees the responsible supply chain management system

- Conducts the Group's greenhouse gas emissions accounting and provides methodological support for climate projects



Sustainability KPIs for senior management



Strategic priorities

In 2025, the Company made further progress on its Socially Sustainable Development Strategy. Under the strategy, Nornickel pursues goals aimed at ensuring decent work and workplace safety while creating opportunities for the development of human capital and local communities, including through cooperation with indigenous peoples.

The Company also focused on updating and implementing its [Environmental and Climate Change Strategy](#). The Strategy sets out goals to mitigate environmental impact, minimise risks, and comply with sustainability standards.

Key sustainability projects that received the most funding in 2025:

- Sulphur Project 2.0
- Range of health and safety initiatives
- Made with Care programme
- Charitable projects

- Norilsk renovation
- Energy saving and energy efficiency projects
- [Clean Norilsk](#)



For more details on the projects, please see [Nornickel's 2025 Sustainability Report](#)

The Company integrates sustainability principles into its corporate culture and governance model. For example, in 2025:

- the Company published its [Sustainability Report](#) and [Responsible Supply Chain Report](#)
- Nornickel conducted due diligence covering 100% of mineral suppliers,¹ identifying no supply chain risks

- the Company assessed a sample of suppliers of goods, works, and services for compliance with sustainability and responsible supply chain requirements. The sample covered 44% of the Group's procurement, with the compliance rate also at 44%²
- Nornickel reviewed recommendations for improving the quality of sustainability risk management
- Company employees continued training through courses on sustainability, responsible supply chain management, and human rights
- the Company measured its human rights index.

In 2026, Nornickel will continue initiatives to further align its operations with leading national and international standards and guidelines, including plans to further integrate sustainability.

Stakeholder engagement

Key stakeholder groups: employees; government authorities; rating providers; shareholders, brokers, investors, and analysts; customers and suppliers; local communities and NGOs.

Stakeholder engagement at Nornickel is guided by three principles

Ongoing dialogue through multiple communication channels, consideration of stakeholder interests and expectations, and analysis of feedback



Management of actual and potential impacts and minimisation of adverse effects



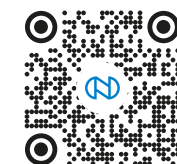
Transparency through the annual publication of stakeholder engagement plans and reports in line with current standards and guidelines



To advance its sustainability agenda, Nornickel uses digital tools that reach out to different target audiences and help assess audience engagement levels, identify key topics to address, gather feedback, and adjust subsequent communications as necessary.

Social media engagement channels

[VK](#)



[OK](#)



[RUTUBE](#)



[Dzen](#)



¹ Mineral suppliers include suppliers of mined minerals (primary processed material that has never been previously refined) and suppliers providing minerals transportation, processing, and loading/unloading services. "Minerals" are minerals containing nickel, cobalt, and copper.
² The results of supplier due diligence and assessment against sustainability and responsible supply chain criteria are further detailed in the [2025 Responsible Supply Chain Report](#).

Partnerships and cooperation

In 2025, Nornickel was recognised by RAEX, Russia's leading rating agency, as the best company in Russia for stakeholder engagement.



For more details on stakeholder engagement, please see Nornickel's 2025 Sustainability Report

For many years, Nornickel has operated a support programme for indigenous peoples and continues to improve its practices in this area. In March 2025, at the 15th Arctic: Territory of Dialogue International Arctic Forum, the Company signed a new cooperation agreement with the Federal Agency for Ethnic Affairs and the Russian Association of Indigenous Peoples of the North. The agreement is primarily aimed at building partnerships for the benefit of indigenous peoples.

In the reporting year, Nornickel became one of the five industrial partners of the future international campus project

in the Trans-Baikal Territory. Between them, the partners will invest more than RUB 3 billion in the construction of the education centre in this region.

Nornickel and ECOFES, a manufacturer of water treatment equipment, presented the results of their joint development of palladium-based electrodes. The innovative palladium-coated electrodes for water treatment significantly improve the efficiency of disinfectant production, reduce energy consumption, and extend equipment service life.

Nornickel became an official partner of the Digital Industry of Industrial Russia (CIPR 2025) conference and entered into strategic partnerships with leading Russian companies to implement best practices in digitalisation.

Nornickel and Moscow State University signed a cooperation agreement aimed at advancing applied environmental research in the Arctic. A distinctive feature of the agreement is the involvement of international research centres in field studies in Norilsk.



ISO standards

Standards	ISO 14001:2015 – Environmental management systems	ISO 9001:2015 – Quality management systems	ISO 45001:2018 – Occupational health and safety management systems
Group's ISO-certified assets	<ul style="list-style-type: none"> PJSC MMC Norilsk Nickel Kola site International site Trans-Baikal Division 	<ul style="list-style-type: none"> PJSC MMC Norilsk Nickel Kola site International site Research institute 	<ul style="list-style-type: none"> PJSC MMC Norilsk Nickel Kola site International site Trans-Baikal Division
Percentage of certified operations	52	49	51

Sustainability initiatives

Initiatives	Status
Together for Sustainability (Tfs) initiative	The Company's compliance with the requirements of the initiative was confirmed by the 2022 re-audit
International Platinum Group Metals Association (IPA)	Member since 1999
Nickel Institute	Member since 2005
UN Global Compact	Member since 2016
Initiative for Responsible Mining Assurance (IRMA)	The Company is implementing a compliance roadmap ¹
ICMM's Mining Principles	The Company is implementing a compliance roadmap
Global Battery Alliance (GBA)	Member since 2021
London Metal Exchange (LME)	In 2025, the London Metal Exchange accepted reports for five LME-listed Nornickel metal brands

ESG ratings and scores

Initiatives	Status
ACRA	ESG-rating – AA+, ESG-2, a very high ESG score
RAEX	ESG rating – AAA, the highest ESG score
ESG Index by RBC and NCR	ESG level I (high)
Expert RA	ESG rating – A+, a high level of planning and implementing sustainability practices. Outlook – stable

¹ In 2022, cooperation with Russian companies was suspended.