

Nornickel's response to the questions from the Business & Human Rights Resource Centre

1. Has Nornickel established any policies and processes that enable the Company to seek prevention and mitigation of adverse human rights impacts caused or contributed to by Nornickel Group companies?

Nornickel's by-laws

The principle of observing human rights is fixed in the company's various documents/policies, including its Code of Business Ethics, personal data processing policy, regulation on the fight against theft of material assets, Policy for the protection of human rights, Indigenous Rights Policy, Local Community Relations Policy, Freedom of Association Policy, and Working Conditions Policy. The company does not use child labour. Human rights is a value that we seek to integrate into our corporate culture throughout our enterprises and across the company's hierarchy, from Nornickel's President to its management to its employees, all of whom commit to respecting human rights and have outlets to report human rights violations. Furthermore, all of the company's new projects are vetted for compliance with national and international legislation and subjected to comprehensive human rights reviews, including impact assessments.

Applicable regulatory framework

Generally accepted international declarations and guidelines
<ul style="list-style-type: none"> ● UN Universal Declaration of Human Rights (1948) ● International Labour Organisation's declarations on fundamental rights and principles at work ● OECD guidelines for multinational enterprises (2011) ● UN Guiding Principles on Business and Human Rights (2011)
Russian legislation
<ul style="list-style-type: none"> ● Constitution of the Russian Federation ● Labour Code of the Russian Federation ● Federal Law No. 181-FZ On the Occupational Health and Safety in the Russian Federation dated 17 July 1999 ● Federal Law No. 82-FZ On the Minimum Wage dated 19 June 2000 ● Federal Law No. 82-FZ On Safeguarding the Rights of Indigenous Minorities of the Russian Federation dated 30 April 1999 ● Other federal laws
Nornickel's by-laws
<ul style="list-style-type: none"> ● Business Ethics Code of MMC Norilsk Nickel ● Human Rights Policy ● Equal Opportunities Programme ● Working Conditions Policy ● Health and Safety Policy ● Personal Data Policy ● Freedom of Association Policy ● Local Community Relations Policy ● Indigenous Rights Policy ● Other by-laws

The Norilsk Nickel Corporate Trust Service

The Norilsk Nickel Corporate Trust Service (CTS), which anyone can contact with proposals, opinions, questions, or complaints, operates on a regular basis. During the ongoing pandemic, the Service operates a special COVID-19 Hotline to address any issues related to spread of the virus and its impact on employees' lives.

The Corporate Trust Service operates to respond quickly to reports of abuse, theft, and other violations. The scope of the Service covers all of the company's business units and the group's enterprises. This service is a system-based operating procedure for dealing with complaints and appeals that has been in place since 2010 and is aimed at a broad audience to identify and quickly respond to the issues that are important to the group's stakeholders and enterprises.

To contact the Corporate Trust Service, one may use the 24/7 toll-free numbers 8-800-700-1941 and 8-800-700-1945 or the e-mail address skd@nornik.ru. Information about the Service is posted on the company's official website www.nornickel.ru and on the company's Intranet.

Receptions for production, social, and labour issues

Along with the Corporate Trust Service, Norilsk Nickel Group organises receptions for production, social, and labour issues. The main functions of these receptions include responding to appeals and monitoring reviews thereof, quickly resolving conflict situations, and preventing violations of employees' rights. Additionally, all of the group's production sites must have documented occupational safety requirements which must obligatorily be observed during work. Compliance with these requirements is monitored on a daily basis. Employees of the group's companies work in inherently dangerous and harmful conditions, therefore, in addition to technical and organisational safety measures, employees are provided with personal protective equipment.

In 2020, on the basis of Norilsk Nickel Corporate Health Center LLC (Norilsk Nickel CHC), the Company launched a project to create its own corporate medical service. Regularly present at production sites, doctors will not only be able to provide emergency medical assistance, but also engage in preventive healthcare and oversee employees' health.

We recognise that Nornickel has legacy issues and are taking far-reaching measures to address these issues and to lay a solid path for a sustainable future. As part of these efforts, we are reviewing mine and plant closure plans in all our divisions, expanding sulphur emissions-capturing technology to additional production sites, renovating and modernising equipment, introducing more and more high-tech training modules to optimise workplace safety, introducing environmental restoration initiatives, and much more.

Social and labour councils and trade unions

In labour relations, employee interests are represented by social and labour councils and trade unions. All the group's major companies operating in the Norilsk Industrial District and Murmansk Region have social and labour councils to represent workers. The Social and Labour Council of MMC Norilsk Nickel and the Social and Labour Council of Kola MMC are made up of the chairs of local councils.

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The group's companies have collective decision-making bodies representing the employer, employees, and trade unions, including collective bargaining commissions, labour dispute commissions, social benefits commissions, social insurance commissions, health and safety commissions, social and labour relations commissions, etc.

The Trade Union of MMC Norilsk Nickel Employees, an interregional public organisation that includes territorial trade unions and trade unions of the Group companies, represents the group's employees' interests on an interregional level. The trade unions of transport and logistics divisions are members of the Yenisei Basin Trade Union of Water Transport Workers (Krasnoyarsk, Russia).

In addition to the Labour Code of Russia, working hours are regulated by the group's companies collective bargaining agreements, clauses 4.1 and 4.2 of 4. Working hours and leisure time. Overtime is compensated for by providing employees with additional rest time or, with the employee's consent, with payment according to rates established by the employer for overtime work, as stipulated in Appendixes #3 & 4.

The Employees of Norilsk Nickel MMC PJSC and its subsidiaries are parties to the Collective Bargaining Agreement of Norilsk Nickel MMC PJSC for 2018–2021.

The group's companies are parties to 21 collective bargaining agreements covering 83% of the group's average headcount. As was the case at the end of 2019, 9.5% of all of the group's employees were represented by trade unions, while 79% were members of social and labour councils.

The absence of strikes and lockouts involving the company's personnel testifies to the effectiveness of Nornickel's employee interactions and its social policy at large.

In order to develop interregional social partnerships, the Interregional Cross-Industry Association of Employers "Union of Copper and Nickel Producers and Their Supporting Industries" and the Trade Union of MMC Norilsk Nickel Employees signed an interregional cross-industry agreement for copper and nickel producers and their supporting industries for 2019-2022. The agreement regulates social and labour relations between employers, who are members of the association, and their employees and sets out common approaches to employee remuneration, compensation and benefits, work and rest schedule, health and safety, dismissals, and other matters.

As at the end of 2019, this agreement applied to 22 of the group's companies, including MMC Norilsk Nickel, covering 89% of the group's employees.

2. How does the Company go about ensuring that companies within Nornickel Group respect human rights in practice?

Key directions for implementing the Code of Business Ethics:

Making employees aware of the Code:

- The Code was sent through the Corporate Automated Document Management System (CADMS) from business supervisors to supervised divisions and RBUs to make the employees aware of its content. Under the CADMS order signed on behalf of D.A. Kryachkova, the Code was sent from the main office to structural units for employees to familiarise themselves with its content.

- Posting the Code on the company's website and on the company's Intranet (https://www.nornickel.ru/upload/iblock/4ab/kodeks_delovoj_ehniki.pdf)

- Deadline: Q1 2021. Completed.

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Integration of the information block about the Code into "Our Values" training:

- The materials were developed and agreed with the Corporate University
- A series of webinars are expected to be held with internal trainers at the beginning of Q2 (with the opening of full-time training), where:
 - the internal trainers will be provided with programme updates;
 - the internal trainers will be motivated to resume running the programme;
 - organisational questions will be answered.
- Deadline: Q2 2021.

Digital course for NN Academy on awareness with the Code:

- Target audience: all employees.
- Short information programme that provides information about the Code and clarifies the main provisions thereof by means of case studies as examples.
- Deadline: Q3 2021.

Information campaign as part of general information programmes:

- Following the example of the project created for the Bystrinsky Mining and Processing Plant (BGOK) to produce visual communication on the enterprise's values, a common programme shall be launched for all RBUs (posters, short animated videos for screens). As part of this campaign, it is advisable to devote part of the posters and screens to the Code:
 - General information poster (stating that the Code exists and providing a link to it on Nornickel's website)
 - Posters comprising key sections of the Code
- Deadline: Q3-Q4 2021.

Verification of CU management programmes / General Leadership Training Projects for inclusion of short information module on the Code of Ethics (15-20 min):

- Target audience: senior management,
- Short information programme that provides information about the Code and clarifies the main provisions thereof by means of case studies as examples,
- Deadline: Q3 2021.

Integration of information about the Code into internal conferences and Corporate dialogue:

- Target audience: all employees,
- Short information programme that provides information about the Code and clarifies the main provisions thereof by means of case studies as examples,
- Deadline: Q4 2021.

Diesel spill

With regard to the May 2020 diesel spill, we accept full responsibility for this accident and are doing everything we can to rectify the situation. We responded quickly to contain the spill and remediate the affected environment, collecting over 90% of the leaked fuel. We have also paid damages of 146.2 billion roubles (approximately US\$2 billion) in full. Furthermore, in December 2020, we began paying direct compensation for damages in the total amount of 174 million roubles to 699 individuals, all representatives of indigenous communities whose livelihoods depend on fishing in Lake Pyasino and the Pyasina River. Furthermore, in early March 2021, Nornickel signed a cooperation agreement with the Federal Agency for Ethnic Affairs (FAEA) to promote sustainable development and to preserve and foster the traditional lifestyles of indigenous peoples living across the areas of the company's operation, all the while providing them with a

better quality of life. In mid-March 2021, Nornickel also pledged to restore fauna habitats that may have been affected by the fuel spill in the vicinity of Norilsk. Nornickel has the utmost respect for the rights of indigenous communities in our regions of operation. We are fully invested in these communities and design our projects to avoid any adverse impacts on them.

3. Do all Nornickel's subsidiaries have policies and processes required under principle 15 of the UN Guiding Principles in place? Which of the subsidiaries do not have relevant policies and processes? When does Nornickel expect to have those subsidiaries establish the required policies and processes?

No separate agreements exist between the company and its sites, however, as the company's sites are either directly owned by the company or owned through controlled subsidiaries, any company policies that are already in place, as well as any policies adopted in the future will include all of the sites in the company's scope, ensuring that they comply with the company's standards for responsible sourcing.

The company takes all necessary and reasonably feasible steps to ensure that all its subsidiaries comply with key principles and provisions of human rights policies and principles, in particular those stipulated in the Freedom of Association Policy, the Indigenous Rights Policy, and the Working Conditions Policy.

We hold ourselves accountable for any incidents that take place on our sites, including at our daughter companies, as well as for any infrastructural deficits or poor decisions by personnel. And we have been doing everything in our power to clean up our sites, instil a strong culture of transparency and safety in our workforce, and ensure that accidents such as the May 2020 diesel fuel spill do not recur in the future.

4. In particular, in the context of the fuel spill, the wastewater dumping, and the partial collapse of a processing plant, were the required policies and processes in place at the time of the occurrence of the relevant incidents?

A number of policies had been developed before the 2020 incidents, i.e. the

- Personal Data Processing Policy (2017),
- Local Community Relations Policy (2017),
- Human Rights Policy (2017),
- Working Conditions Policy (2017),
- Indigenous Rights Policy (2018).

Several policies were developed or are to be developed/updated in 2020-2021 based on lessons learned from recent incidents:

- Developed: Business Ethics Code (2020),
- To be developed:
 - Responsible Sourcing Policy (3Q 2021),
 - Stakeholder Engagement Policy (3Q 2021),
- To be updated:
 - Freedom of Association Policy (3Q 2021),
 - Human Rights Policy (3Q 2021),
 - Indigenous Rights Policy (3Q 2021).

5. Does Nornickel has operational policies and processes in place necessary to embed its commitment to meet the responsibility to respect human rights?

The company complies with the laws of the Russian Federation and other countries of its presence and 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's Guiding Principles on Business and Human Rights. The Supplier Code of Conduct will be developed in Q3 2021 to fulfil Nornickel's responsibility toward respecting human rights and promoting a respectful attitude towards humans rights through the company's entire supply chain.

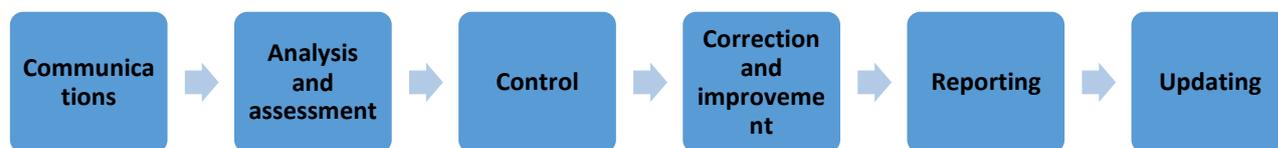
According to Russian labour law, "Use of the labour of persons under 18 years of age in jobs with hazardous conditions or underground work and in jobs that might cause harm to their health is prohibited." For the list of Conventions ratified by Russia, click here:

https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102884

The company's commitment to respecting human rights is reflected in its Human Rights Policy and other by-laws governing HR, environmental, social, and other matters.

The company's President is responsible for ensuring that Nornickel respects human rights. The company's management and employees are committed to complying with Russian and international laws and the company's by-laws on human rights. The Company has a clear governance structure with a defined hierarchy for reporting and resolving human rights issues.

Nornickel's human rights protection process



Nornickel regularly assesses the potential impact of its operations on human rights. On top of addressing human rights risks and ensuring full compliance with applicable requirements, the company also implements "best practices" (including, employment contracts and collective bargaining agreements, favourable work and rest conditions for employees, etc.) and expects its suppliers and contractors to respect human rights throughout their operations.

All of the company's new projects are vetted for compliance with national and international legislation and are subject to a comprehensive human rights review, including an impact assessment. These checks involve over ten of Nornickel's departments and functions.

Information on alleged human rights violations is collected via Nornickel's Corporate Trust Line, employee questionnaires, and surveys of the local population. The company guarantees confidentiality for whistleblowers. Report statistics are regularly reviewed by the Audit and Sustainable Development Committee of the Board of Directors.

For more detailed information on human rights compliance at Nornickel, see the Appendix (Table 1. Respect for human rights across Nornickel's operations).

6. Does Nornickel have human rights due diligence process in place as required by the UN Guiding Principles?

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In January 2021, Nornickel joined the Responsible Sourcing Blockchain Network (RSBN), an industry collaboration among members across the minerals supply chain using blockchain technology to support responsible sourcing and production practices from mine to market.

With Nornickel joining the RSBN, a series of its supply chains have been and will continue to be audited annually against key responsible sourcing requirements by RCS Global. The audits cover each stage of the company's vertically integrated operations from Russian mines to refineries in Finland and Russia. Once audited against responsible sourcing requirements, each supply chain will be brought on to the RSBN and an immutable audit data trail will be captured on the platform as proof of responsible nickel and cobalt production and maintenance, as well as of the ethical provenance of these metals.

For RSBN, an audit has been conducted in the following areas:

- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (3rd edition);
- The China Chamber of Commerce of Metals, Minerals & Chemicals Importers & Exporters (CCCMC), The Responsible Cobalt Initiative (RCI), the Responsible Minerals Initiative (RMI)'s collaborative Pilot Cobalt Refiner Supply Chain Due Diligence Standard;
- Responsible Business Alliance, Code of Conduct, Version 6.0 (2018), Provision B.1) Health and Safety;
- UK Modern Slavery Act (2015);
- ISO 14001 certificate check;
- In cases of no ISO 14001 certificate, include Copper Mark, Risk Areas: 14-18, 20, 21;
- Environmental Risk Management;
- Greenhouse Gas (GHG) Emissions;
- Energy Consumption;
- Freshwater Management and Conservation;
- Waste Management;
- Pollution;
- Biodiversity and Protected Areas.

For one of our clients, an audit has been conducted in the following areas:

- Due Diligence Management;
- Modern Slavery;
- Child Labour;
- Wages and Benefits and Working Hours;
- Discrimination and Harassment;
- Freedom of Association;
- Health and Safety;
- Environment (following same criteria as for RSBN);
- Business Ethics.

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7. Has the Company had a human rights due diligence process in place that covered assessing the human rights risks corresponding to the actual human rights impacts caused by the fuel spill, the wastewater dumping, and the partial collapse of a processing plant?

In 2021, RCS Global conducted a compliance audit of Nornickel for human rights standards specified in the answer to question 6. The audit report for the Polar Division confirmed full compliance with the standards mentioned above. No violations were identified.

In September 2020, Nornickel signed a series of new cooperation agreements on a comprehensive, five-year assistance programme totalling 2 billion roubles with three organisations representing over 90% of the Indigenous Peoples living in the north of Russia. The programme includes measures, amongst many others, to protect the natural habitat and support the traditional activities of the indigenous peoples of the North and Siberia, in addition to providing funding for various needs, from housing and healthcare to infrastructure and tourism to education and cultural projects, all of which were defined with significant input from the beneficiary communities during the aforementioned expedition. This case study alone demonstrates that we are committed to going from theory to practice and are eager to act to effect positive change and improve people's standard of living in a tangible way.

8. Has the Company defined in any of its operational policies and procedures what are the most salient human rights for Nornickel and Nornickel Group given the sector and operational context of the whole enterprise?

<https://www.nornickel.com/sustainability/employees/>:

Nornickel respects and provides its employees with equal rights and opportunities regardless of gender, age, race, religion, ethnicity, or origin. All employees have equal opportunities to realise their talents and job promotion is carried out only on the basis of professional competencies.

The principle of observing human rights is fixed in the company's various documents/policies, including its Code of Business Ethics, personal data processing policy, regulation on the fight against theft of material assets, Policy for the protection of human rights, Indigenous Rights Policy, Local Community Relations Policy, Freedom of Association Policy, and Working Conditions Policy. The company does not use child labor.

<https://www.nornickel.com/news-and-media/press-releases-and-news/nornickel-to-extend-partnership-with-russia-s-extreme-northwest-indigenous-people/>:

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Nornickel has always kept a strong focus on support to local communities that represent the interests of small indigenous groups of the North. The company has a wealth of positive experience interacting with the Indigenous Peoples' associations on the Taymyr Peninsula; now a five-year support programme, developed by Nornickel together with local indigenous communities, is being implemented there. And although Nornickel has no assets on the traditional Sami territories in the Murmansk region, we are always sensitive to the needs and requests of Indigenous Peoples in the regions where we operate. Today, there is every reason to continue our cooperation at an even better level.

9. Has the “meaningful consultation with potentially affected groups and other relevant stakeholders” been part of the human rights due diligence process at Nornickel and Nornickel Group? If so, please provide information on the outcome of relevant consultations.

Of all our recent projects/collaborations, the one that best exemplified our commitment to human rights was an ethnographic expedition that we supported in summer 2020. The expedition, which took place in the aftermath of the May 2020 accidental diesel fuel spill, comprised 100 interviews and polls of representatives of indigenous communities in the Taymyr Peninsula and provided invaluable insight into the needs of local indigenous populations, serving as a meaningful consultation with affected groups and an essential part of our human rights due diligence process.

10. Has the Company engaged with the Aborigen-Forum and the relevant indigenous peoples on the adverse human rights impacts and remediation issues raised in the Aborigen-Forum Letter? If so, please provide specific information on how the Company is addressing the relevant issues.

The Aborigen Forum involves only several people, which seems insufficient for an expert organisation that claims to cover the full range of issues common to the Russian Arctic and 28 regions with Indigenous Peoples.

Gennady Shchukin, a municipal deputy living in the Taymyr Dolgano-Nenets District, is the secretary of said organisation. The representatives of the Company (the Polar Division and the Headquarters) are in regular contact with him. They keep up their correspondence, respond to his questions, and have face-to-face meetings with him when he comes to Moscow.

A Community Coordination Council for the Indigenous Minorities of the North (IMN) is being set up under the Polar Division to implement the aforementioned five-year IMN Support Programme described in agreement with three Indigenous Peoples associations at the national, regional, and local levels and to distribute funds among the communities that took part in the ethnological assessment, and compensate for damage to traditional nature management.

Information on the Community Coordination Council:
<https://www.nornickel.com/news-and-media/press-releases-and-news/nornickel-and-federal-agency-for-ethnic-affairs-to-jointly-support-indigenous-northern-minorities/type=news>

Mr. Shchukin was invited to join the Coordination Council, but he refused. However, his proposals were included in the Support Programme, nevertheless. Mr. Shchukin suggested signing a separate agreement and holding separate negotiations with him and put forward new demands, e.g. free food supply for Volochanka and Ust-Ava, etc. It should be noted that Mr. Shchukin does not recognise the Taymyr IMN Association,

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which has its own statutes, elective governing bodies, and holds regular meetings and congresses.

Mr. Shchukin's opinion was also taken into account in the ethnological assessment conducted by the Arctic Development Project Office, an independent non-profit expert center.

Furthermore, the Norilsk Taymyr Energy Company (NTEC JSC, a Nornickel subsidiary) signed an agreement with Mr. Shchukin, as the head of the Amyaksin Community, on compensation for damage to traditional nature management, which involved a payment of 30 mln roubles. As of yet there has been no information on the reporting meeting of the community. For additional information on compensation paid to indigenous peoples affected by the fuel spill at HPP 3, click here:

<https://www.nornickel.com/news-and-media/press-releases-and-news/nornickel-s-unit-to-pay-compensation-to-indigenous-communities-affected-by-fuel-spill/type=news>

11. Has the Company received any other communication from the affected stakeholders with respect to any allegations of adverse human rights impacts caused by the fuel spill, the wastewater dumping, and the partial collapse of a processing plant, and if so, has the Company engaged with the relevant stakeholders?

<https://www.nornickel.ru/news-and-media/press-releases-and-news/nornikel-i-federalnoe-agentstvo-po-delam-natsionalnostey-budut-vmeste-podderzhivat-korennye-narody-severa/>

On 3 March 2021, Nornickel and the Federal Agency for Ethnic Affairs (FAEA) signed a Cooperation Agreement in Norilsk. The parties agreed to promote sustainable development and to preserve and foster the traditional lifestyle of indigenous peoples living across the areas of the company's operations, in addition to working to provide them with a better quality of life. Nornickel and the FAEA also intend to cooperate on improving social and economic opportunities in the territories where indigenous people live. Additionally, the parties agreed to take into account the positions of all stakeholders and consider any of their requests and suggestions when making decisions and implementing joint projects that address matters related to the interests of Indigenous Peoples.

Arctic development is a priority that drives national economic growth and has been a huge area of focus. With industrial projects coming in thick-and-fast in the north of Russia, it is important not to lose sight of the people who inhabit this territory and still uphold traditional lifestyles. The agreement is aimed at striking a balance between facilitating industrial development and preserving the unique natural landscape of the north of Russia and the lifestyle adopted by local Indigenous Peoples.

As part of their cooperation, Nornickel and the Federal Agency for Ethnic Affairs will implement a wide range of joint initiatives. These include the International Summit of Arctic's Indigenous Leaders, as well as events to encourage Indigenous People living in the regions of the company's operation to use global platforms for indigenous communities and the social diplomacy programme Indigenous Peoples of Russia, to develop a methodology for ethnicity expert reviews based on the ethnological study of peoples indigenous to the Taymyr Peninsula, and more.

Nornickel has significantly expanded the scope of its cooperation with indigenous peoples and has engaged in better dialogue. Joint planning has started to facilitate the

development of local infrastructure, indigenous trades and indigenous community-led commercial activities, as well as new sustainable production businesses.

The company has joined hands with tribal communities to develop and launch a five-year aid and development programme focusing on indigenous communities in the north of Russia, groups that were directly involved in creating a list of projects to be implemented. Nornickel committed a total of RUB 2 bn for these purposes.

The programme includes initiatives to improve the quality of village life and promote indigenous trades. Amongst the initiatives to be launched this year are the construction of 18 residential buildings and community centres in the Ust-Avam and Volochanka settlements; the acquisition of fish and reindeer meat processing facilities, freezers, equipment for skin currying and souvenir production; the study and registration of fishery resources at the Pyasina River's side reservoirs to issue quotas to tribal communities; and the creation of a tourist information centre in the Ust-Avam settlement. All of these projects are joint initiatives whose success depends on close cooperation with indigenous communities. This is why we are setting up a Coordination Council supervised by the Director of Nornickel's Polar Division for Indigenous Communities engaged in economic activity near and around the Pyasina River and Avam Tundra. The council will invite representatives of regional and municipal authorities to contribute to its work and will include representatives of more than 50 business entities run by Indigenous Peoples. Day-to-day liaising will be managed through a department that has now been established in the Polar Division to work with Indigenous Peoples.

According to Grigory Dyukarev, Chairman of the Association of the Indigenous Peoples of the Taymyr Peninsula, the council is a new mechanism that will, first and foremost, underline the equal status of the parties involved. This means that indigenous communities have been invited to play a meaningful role in dialogue and can now essentially take control of their lives and make improvements by setting the necessary development priorities. We welcome this agreement and, of course, commend the fact that the Federal Agency for Ethnic Affairs and Nornickel are working to develop joint approaches.

Key initiatives of the Comprehensive Support Programme until 2024:

Projects in support of traditional activities	<ul style="list-style-type: none">• Building a shop to process wild reindeer carcasses• Cooperating with businesses working in the Pyasina River basin and individuals engaged in traditional fishing in the Pyasina River basin• Purchasing two 20 cu m refrigeration chambers (Volochanka)• Building ethnic villages with shops to manufacture fur and leather apparel and produce horn and ivory products• Subsidising additional helicopter flights to deliver products from local settlements to Dudinka• Supporting indigenous communities in reviving reindeer herding in the Norilsk-Pyasina water basin
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	<ul style="list-style-type: none"> • Assessing the carrying capacity of reindeer pastures in the Ust-Avam tundra • Arranging for an expert assessment of the fishing capacity of Lake Pyasino and replenishing fish populations • Quantifying fish resources in Lake Pyasino to determine quotas and purchasing fish at auctions that favour indigenous communities
<p>Housing projects</p>	<ul style="list-style-type: none"> • Building 18 dwelling houses over a three-year period (in Volochanka and Ust-Avam) • Building housing for orphaned indigenous children • Providing financial assistance to rent land plots from settlement administrations and providing these free-of-charge to those wishing to improve their housing conditions
<p>Health projects</p>	<ul style="list-style-type: none"> • Building a new first-aid and obstetric post in Volochanka • Purchasing specialised (crawler) vehicles to hold medical checkups and screening
<p>Educational and cultural projects</p>	<ul style="list-style-type: none"> • Training indigenous children in professions in demand at by Norilsk Nickel with a path towards eventual employment • Supporting advanced training of teachers at remote settlement schools (in Volochanka and Ust-Avam) • Employing teachers to general education schools in remote settlements, including employment under Norilsk Nickel's grant programmes (Volochanka and Ust-Avam) • Publishing learning aids in indigenous languages • Introducing online education opportunities and, in the long run, providing broadband internet access • Building a community centre by 2024 (Volochanka) • Building community centres in Kheta and Nosok

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	<ul style="list-style-type: none">• Publishing a book dedicated to the 90th anniversary of the Taymyr Dolgano-Nenets Municipal District• Shooting a short film dedicated to the 90th anniversary of the Taymyr Dolgano-Nenets Municipal District• Installing an outdoor LED screen and related equipment to hold large-scale public events on the river embankment in Dudinka
Sporting and infrastructural projects	<ul style="list-style-type: none">• Purchasing bathhouse modules (Volochnanka and Ust-Avam)• Purchasing two buses with the inscription "From Nornickel to the District" for the needs of Dudinka• Installing children's playgrounds (Volochnanka and Ust-Avam)

Appendix

Table 1

Respect for human rights across Nornickel’s operations

Key human rights ¹	Nornickel’s by-laws													Approaches and key achievements in 2020		
	B u s i n e s s E t h i c s C o d e	H u m a n R i g h t s P o l i c y	E q u a l O p p o r t u n i t i e s P r o g r a m m e	W o r k i n g C o n d i t i o n s P o l i c y*	O c c u p a t i o n a l H e a l t h a n d S a f e t y P o l i c y	P e r s o n a l D a t a P o l i c y	F r e e d o m o f A s s o c i a t i o n P o l i c y	P o l i c y R e g a r d i n g S u p p o r t f o r S m a l l a n d M e d i u m E n t e r p r i s e s	L o c a l C o m m u n i t y R e l a t i o n s P o l i c y*	E n v i r o n m e n t a l P o l i c y	E n v i r o n m e n t a l I m p a c t A s s e s m e n t P o l i c y	B i o d i v e r s i t y P o l i c y	R e n e w a b l e E n e r g y S o u r c e s P o l i c y		I n d i g e n o u s R i g h t s P o l i c y*	
Right to life, freedom, and privacy, freedom from arbitrary arrest																<p>In 2020, the company’s health and safety indicators were some of the best in the metals and mining industry, with LTIFR going down to 0.21 against 0.32 in 2019.</p> <p>The company does not tolerate discrimination on any grounds. In 2020, we had no reported cases of racial, gender, religious, political, social, or other discrimination.</p> <p>The company maintains a social partnership framework, with collective agreements covering 93.7% of the workforce</p> <p>The average salary paid to Nornickel’s employees is well above Russia’s average. The company takes steps to secure jobs for vulnerable population groups and people with disabilities.</p>
Right to health and medical assistance																
Right to protection from discrimination																
Right to freedom of association and collective bargaining																
Right to work and to fair and adequate remuneration																

¹ According to the International Bill of Human Rights, the Indigenous and Tribal Peoples Convention of the International Labour Organisation, and the Constitution of Russia.

