

APPROVED

by the Board of Directors

of MMC Norilsk Nickel

Minutes No. GMK/22-pr-sd

dated 22 July 2025

CONTRACTOR HEALTH AND SAFETY MANAGEMENT POLICY

PJSC MMC Norilsk Nickel (the “Company” or “Nornickel”) is committed to establishing an effective contractor health and safety management system.

The life and health of every individual at Nornickel’s production sites is of paramount importance.

We firmly believe that collaborative partnerships with contractors foster a unified, safe working environment – one that delivers mutual benefits and advances our shared objectives. This approach creates opportunities for long-term cooperation with trusted partners.

The Company expects its partners to comply with all applicable health and safety regulations, while encouraging them to develop and enhance their own health and safety management systems.

Company principles:

1. The Company favours contractors that have established their own health and safety management systems and are committed to their continuous improvement.
2. Relationships with contractors are built on mutual respect and consistent safety standards across all Company sites. We address all health and safety matters with honesty and transparency.
3. The Company considers it mandatory for contractors’ employees to be fully aware of, and comply with, corporate health and safety requirements in force at the Company.
4. The Company sets performance assessment criteria (ratings) for contractors in the field of health and safety.
5. The Company promotes the adoption of best practices in health and safety among contractors and, where necessary, provides guidance and advisory support.
6. The Company implements incentives for contractors to ensure compliance with health and safety requirements. Contractor initiatives aimed at enhancing workplace safety are encouraged.
7. The Company applies the same safety standards to subcontractors as it does to general contractors and expects the latter to assume responsibility for actions or omissions of their subcontractors’ employees.
8. All incidents involving contractors’ personnel are jointly investigated by the Company and the respective contractor to identify root causes. Findings are recorded in corporate reporting, and the lessons learned are captured.
9. Every individual involved in the production process bears personal responsibility for adhering to safety standards. This includes active participation of contractors’ employees in identifying and mitigating risks, fostering a safety culture at all levels.
10. The Contractor Safety Management Committee makes prompt decisions on all required modifications to the contractor health and safety management system to ensure Policy compliance, and these decisions are mandatory for implementation.

WORKING TOGETHER – CARING ABOUT EACH OTHER’S SAFETY