

Company Name Norilsk Nickel
Industry Extractives
Overall Score (*) 15.2 out of 100

Theme Score	Out of	For Theme
2.3	10	A. Governance and Policies
0.7	25	B. Embedding Respect and Human Rights Due Diligence
2.5	15	C. Remedies and Grievance Mechanisms
3.1	20	D. Performance: Company Human Rights Practices
3.0	20	E. Performance: Responses to Serious Allegations
3.5	10	F. Transparency

(*) 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 that Newmont Mining and Goldcorp merged as the assessment process was taking place and as such most of the assessment is based on pre-merger reporting by Newmont Mining.

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 2019 Methodology document. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

Detailed assessment

A. Governance and Policies (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	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: General HRs commitment: The Company states on its website, as part of its principles and mission, it states that 'Nornickel declares its commitment to human rights as provided by the Constitution of the Russian Federation and other Russian laws, generally accepted principles and [...] recommendations of the International Labour Organisation'. However, we could not find a clear commitment to Human Rights on the company's policy. [Business ethics code, 2012: nornickel.com & Mission and principles on website: nornickel.com] Score 2 <ul style="list-style-type: none"> Met: UNGPs: The Company states that it "respects both international standards for human rights protection and labour standards set out in the International Bill of Human Rights, the International Labour Organisation Declaration on Fundamental Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights." [Sustainability Report 2018, 2019: nornickel.com] Not met: OECD
A.1.2	Commitment to respect the human rights of workers	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: ILO Core: The Company states that it "respects both international standards for human rights protection and labour standards set out in the International Bill of Human Rights, the International Labour Organisation Declaration on Fundamental

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			<p>Principles and Rights at Work and the UN Guiding Principles on Business and Human Rights." [Freedom of Association Policy, 2017: nornickel.com & Sustainability Report 2018, 2019: nornickel.com]</p> <ul style="list-style-type: none"> • Not met: UNGC principles 3-6 [Sustainability Report 2018, 2019: nornickel.com] • Not met: Explicitly list All four ILO apply to EX BPs <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Explicit commitment to All four ILO Core: The code indicates that "we strictly obey the principles of the prevention of any form of discrimination and forced labor". In addition, the Freedom of Association Policy states that it "respects the rights and trade union freedoms of the Company's employees. The Company guarantees that every employee has the right to join a trade union and the right to be represented by a trade union in collective bargaining." However, no evidence found in relation to commitment against child labour. [Freedom of Association Policy, 2017: nornickel.com & Sustainability Report 2018, 2019: nornickel.com] • Met: Respect H&S of workers: The ethics code includes a statement and guidelines on labour protection and industrial safety. [Business ethics code, 2012: nornickel.com] • Not met: H&S applies to EX BPs
A.1.3.EX	Commitment to respect human rights particularly relevant to the industry (EX)	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: Based on UN Instruments • Not met: Voluntary Principles (VPs) participant • Not met: Uses only ICoCA members • Met: Respecting indigenous rights: The CSR report states that 'the Company recognises the rights of indigenous minorities residing across the Company's regions of operation and provides patronage assistance as part of the initiatives preserving and promoting the culture and traditions of the peoples in the Far North. [CSR Report, 2017: nornickel.com & Indigenous Rights Policy, February 2018: nornickel.com] • Not met: ILO 169 • Not met: UN Declaration on the Rights of Indigenous People (UNDRIP) • Not met: Expects BPs to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: FPIC commitment • Not met: Voluntary Guidelines on Tenure Rights • Not met: IFC performance standards • Not met: Zero tolerance for land grabs • Not met: Respecting the right to water • Not met: Expects BPs to commit to all these rights
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Regular stakeholder engagement: The Company indicates in the CSR report that its 'key stakeholders are employees, shareholders, investors, business partners, national authorities, local communities and Russian and International non-profit organisations'. The Company discloses for each group their key interests, the interaction mechanisms and the key interaction events in the last reporting year. Key interests include 'favourable working conditions', 'decent salaries', 'tender-based procurement', 'social stability support across the Company's geographies', etc. [Sustainability Report 2018, 2019: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	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: Commits to remedy: The Company states in the CSR report that 'Nornickel takes steps to prevent and remedy any human rights violations, if any, across its assets and operations'. However, no evidence of a commitment to remedy. [Sustainability Report 2018, 2019: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing access to other remedies • Not met: Collaborating with other remedy initiatives • Not met: Work with EX BPs to remedy impacts
A.1.6	Commitment to respect the rights of human rights defenders	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: Zero tolerance attacks on HRs Defenders (HRDs) <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects EX BPs to reflect company HRD commitments

A.2 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Met: CEO or Board approves policy: The business ethics code is prefaced and signed by the CEO [Business ethics code, 2012: nornickel.com] • Met: Board level responsibility for HRs: The Audit and Sustainable Development committee of the board has, among its functions, to perform 'regular analysis of the Company's policies, internal documents and procedures related to health, safety and environment for their compliance with business needs and regulatory requirements, and, if necessary, preparation of recommendations for the Board of Directors on their improvement. [Terms of Reference of Audit and Sustainable Development Committee, 10/2017: nornickel.com] Score 2 <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO
A.2.2	Board discussions	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Board/Committee review of salient HRs: Although the Board reviews health and safety matters, it does not clearly states it monitors other human rights issues. [Sustainability Report 2018, 2019: nornickel.com] • Not met: Examples or trends re HR discussion Score 2 <ul style="list-style-type: none"> • Not met: Both examples and process
A.2.3	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: Incentives for at least one board member: The Company states that bonuses of the remuneration system for 'the President and members of the Management Board' are 'linked to the Company's performance, including both financial metrics (EBITDA, free cash flow) and non-financial indicators (lower workplace injury rates, stakeholder involvement, etc.). Therefore, health and safety is included. [Annual report, 2016: nornickel.com & Annual Report 2018, 2019: nornickel.com] • Not met: At least one key EX RH risk, beyond employee H&S: Although health and safety is included in a board member performance incentive, it is not clear whether safety-related metrics include safety of local communities and workers of extractive business partners. [Annual report, 2016: nornickel.com & Annual Report 2018, 2019: nornickel.com] Score 2 <ul style="list-style-type: none"> • Not met: Performance criteria made public

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	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Commits to ILO core conventions • Not met: Senior responsibility for HR: The Company states that 'all executive efforts aimed at our CSR are coordinated by the Management Board, the President, and different Board Committees. However, it is not clear at which senior management position is allocated operational responsibility for human rights policies implementation. Also, no evidence found of the Company committing to all the ILO core area. [Sustainability Report 2018, 2019: nornickel.com] Score 2 <ul style="list-style-type: none"> • Not met: Day-to-day responsibility • Not met: Day-to-day responsibility for EX BRs
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 for human rights: The Company states that bonuses of the remuneration system for 'the President and members of the Management Board' (senior executive officers, 'in charge of day-to-day operations) are 'linked to the Company's performance, including both financial metrics (EBITDA, free cash flow) and non-financial indicators (lower workplace injury rates, stakeholder involvement, etc.). Therefore, health and safety is included. [Annual Report 2018, 2019: nornickel.com] • Not met: At least one key EX HR risk, beyond employee H&S: Although health and safety is included in senior executives performance incentives, it is not clear

Indicator Code	Indicator name	Score (out of 2)	Explanation
			whether safety-related metrics include safety of local communities and workers of extractive business partners. [Annual Report 2018, 2019: nornickel.com] Score 2 • Not met: Performance criteria made public
B.1.3	Integration with enterprise risk management	1	The individual elements of the assessment are met or not as follows: Score 1 • Met: HR risks is integrated as part of enterprise risk system: The Company indicates in the annual report that key risks integrated in its risk management framework include workplace injury risk, risks related to social tensions in regions where the company operates and risks related to strained social and labour relations among the workforce. The Company also explains the suggestions of the risk management function to face the risks, including strictly abide by the collective bargaining agreements, opinion polls among local communities to learn about living standards, social sentiments, social projects to support employees families and a number of measures related to safety. [Annual Report 2018, 2019: nornickel.com] Score 2 • Not met: Audit Ctte or independent risk assessment
B.1.4.a	Communication /dissemination of policy commitment(s) within Company's own operations	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to ILO core conventions • Not met: Communicates its policy to all workers in own operations Score 2 • Not met: Commits to all 4 ILO core conventions • Not met: Communication of policy commitments to stakeholder • Not met: How policy commitments are made accessible to audience
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Commits to all 4 ILO core conventions for suppliers • Not met: Communicating policy to EX contractors and joint ventures • Not met: Including to EX BPs (removed) Score 2 • Not met: How HR commitments made binding/contractual • Not met: Including on EX BPs
B.1.5	Training on Human Rights	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Scores at least 1 on A.1.2 • Not met: Trains all workers on HR policy commitments • Not met: Trains relevant EX managers including security personnel Score 2 • Not met: Score of 2 on A.1.2 • Not met: Both requirements under score 1 met
B.1.6	Monitoring and corrective actions	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Scores at least 1 on A.1.2 • Not met: Monitoring implementation of HR policy commitments: Although the Company indicates that risk mitigations for CSR risks include 'regular social monitoring across the Group's operations', no further details found. Also, in order to meet the requirements, the policies against which the company monitors its operations need to cover the ILO Declaration or all ILO core areas at a minimum. [Sustainability Report 2018, 2019: nornickel.com] • Not met: Monitoring EX BP's Score 2 • Not met: Score of 2 on A.1.2 • Not met: Describes corrective action process • Not met: Example of corrective action • Not met: Discloses % of EX supply chain monitored
B.1.7	Engaging business relationships	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: HR affects selection EXs business partners • Not met: HR affects on-going EX business partner relationships Score 2 • Not met: Both requirement under score 1 met • Not met: Working with EX business partners to improve performance
B.1.8	Approach to engagement with potentially	0	The individual elements of the assessment are met or not as follows: Score 1 • Not met: Stakeholder process or systems: Although the Company describes stakeholder engagement, however, no evidence found in relation to the process to

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	affected stakeholders		<p>identify and choose stakeholders to engage in relation to human rights issues (the management system that allows interaction with affected stakeholders in human rights issues). [Sustainability Report 2018, 2019: nornickel.com]</p> <ul style="list-style-type: none"> • Not met: Frequency and triggers for engagement • Not met: Engagement includes EX business partners workers • Not met: Engagement includes EX business partners communities <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and company's actions on them

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Identifying risks in own operations: Although the Company discloses the list of material aspects and boundaries, no evidence found of a formal system to identify which are the human rights risks that it faces. [Sustainability Report 2018, 2019: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: identifying risks in EX business partners • Not met: Ongoing global risk identification • Not met: In consultation with stakeholders • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	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: Salient risk assessment (and context) • Not met: Public disclosure of salient risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking 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: Action Plans to mitigate risks • Not met: Including amongst EX BPs • Not met: Example of Actions decided <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirements under score 1 met
B.2.4	Tracking: Monitoring and evaluating 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: System to check if Actions are effective • Not met: Lessons learnt from checking effectiveness <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
B.2.5	Communicating : Accounting for how human rights impacts are addressed	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: Comms plan re identifying risks • Not met: Comms plan re assessing risks • Not met: Comms plan re action plans for risks • Not met: Comms plan re reviewing action plans • Not met: Including EX business partners <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	1.5	<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: Channel accessible to all workers: The CSR report states that 'The Corporate Trust Service was established at Nornickel back in 2010 to ensure prompt response to reported violations, abuses and embezzlement. The Service's geography covers all business units of the Company and Group companies'. To make a report, anyone is invited to call a toll-free hotline available 24/7 [...] or e-mail to [...]. The Company reports on the performance of the channel, which shows the type of reports received, including human rights-related complaints. [Sustainability Report 2018, 2019: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Number grievances filed, addressed or resolved: The Company discloses the number of breaches and breaks them down by type. 394 reports were filed in total during 2018. [Sustainability Report 2018, 2019: nornickel.com] • Not met: Channel is available in all appropriate languages • Met: Opens own system to EX BPs workers: The Company states on its Sustainability Report that " To make a report, anyone is invited to call a toll-free hotline available 24/7 [...] or e-mail to [...]. The Company reports on the performance of the channel, which shows the type of reports received, including human rights-related complaints." [Sustainability Report 2018, 2019: nornickel.com]
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	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: Grievance mechanism for community: The Company states in the CSR report that 'any interested person may contact the service', and the annual report also indicates that it is open to 'shareholders and other stakeholders'. The Company also has a 'grievance redressal system' for external stakeholders, and the matter will be escalated up to the Board. [Sustainability Report 2018, 2019: nornickel.com & Annual Report 2018, 2019: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes accessibility and local languages: Although the reporting channels are available on the website, it is not clear whether it is possible to establish communications in local languages. [Annual Report 2018, 2019: nornickel.com] • Not met: Expects EX BPs to have community grievance systems • Not met: EX BPs communities use global system
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	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: Engages users to create or assess system • Not met: Description of how they do this <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Engages with users on system performance • Not met: Provides user engagement example on performance • Not met: EX BPs consult users in creation or assessment
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	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: Response timescales: The CSR report indicates that 'after a report is registered by an operator, the standard time until the investigation results are reviewed by the Head of Service is 21 days. The exceptions are reports that require immediate action or additional investigation. However, no further details found in relation to timescales for informing the complainant. [Sustainability Report 2018, 2019: nornickel.com] • Not met: How complainants will be informed <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Escalation to senior/independent level [Annual Report 2018, 2019: nornickel.com & Sustainability Report 2018, 2019: nornickel.com]
C.5	Commitment to non-retaliation over complaints or concerns made	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: Public statement prohibiting retaliation: Statements indicating that channels are open to 'any interested person' or 'shareholders and other stakeholders' are provided in the CSR report and the Annual report respectively. The Code states that 'the Company guarantees the absence of negative consequences for anyone who reports violations of the Code (for instance, persecution or discrimination)'. [Business ethics code, 2012: nornickel.com & Sustainability Report 2018, 2019: nornickel.com]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Not met: Practical measures to prevent retaliation: The Code states that 'if a worker who reports violations of the Code wants to be anonymous for some reason, he must provide sufficient information for the due inquiry into his report'. However, it is not clear if this measure is extensive to other stakeholders reporting violations of the code. [Business ethics code, 2012: nornickel.com] Score 2 <ul style="list-style-type: none"> • Not met: Has not retaliated in practice • Not met: Expects EX BPs to prohibit retaliation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms • Not met: Complainants not asked to waive rights Score 2 <ul style="list-style-type: none"> • Not met: Will work with state based or non judicial mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> • Not met: Describes how remedy has been provided • Not met: Says how it would remedy key sector risks Score 2 <ul style="list-style-type: none"> • Not met: Changes introduced to stop repetition • Not met: Approach to learning from incident to prevent future impacts • Not met: Evaluation of the channel/mechanism

D. Performance: Company Human Rights Practices (20% 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: Living wage target timeframe or achieved: The CSR report states that 'the key principles that underlie the Company's remuneration system include: Progressive remuneration system in line with the job grading framework; single approach to salaries and wages; incentivising employees to achieve their goals and objectives by improving individual, business unit and Group performance; competitive salary; promotion of the Company's image as a responsible and reliable employer'. However, it is not clear whether it pays all workers (company-wide) a living wage or has a target timeframe to do so. [CSR Report, 2017: nornickel.com & Sustainability Report 2018, 2019: nornickel.com] Score 2 <ul style="list-style-type: none"> • Not met: Describes how living wage determined: The CSR report indicates that in Russia, some companies of the Group 'made new collective bargaining agreements or extended the expired ones. Some of the agreements were amended by collective bargaining commissions in the reporting year. These amendments were mostly necessitated by adjustments in wage rates arising from legislative changes, organisational structure transformation and introduction of a new automated HR system'. However, it is not clear whether wages determined are living wages and whether collective bargaining agreement negotiations are carried out company-wide (evidence found refers to Russia). [CSR Report, 2017: nornickel.com & Annual Report 2018, 2019: nornickel.com] • Not met: Pays living wages • Not met: Reviews living wages definition with unions
D.3.2	Transparency and accountability (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: Member of EITI • Not met: Reports of taxes and revenues beyond legal minimums Score 2 <ul style="list-style-type: none"> • Not met: Reports taxes and revenue by country • Not met: Steps taken re non EITI countries • Not met: Disclosures contract terms where not a requirement

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	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"> • Not met: Commits not to interfere with union rights and collective bargaining and prohibits intimidation and retaliation: The Company has collective bargaining agreements covering more than 80% of the Group workforce. However, no evidence found in relation to commitments to not interfere with the rights of workers to form or joint trade unions covering all the Group. [Sustainability Report 2018, 2019: nornickel.com & Business ethics code, 2012: nornickel.com] • Met: Discloses % covered by collective bargaining: The Company states that collective bargaining agreements cover 80% of the Company's employees. [Sustainability Report 2018, 2019: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both requirement under score 1 met
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	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: Injury Rate disclosures: The Company provides figures for the last five reporting years. [CSR Report, 2017: nornickel.com & Sustainability Report 2018, 2019: nornickel.com] • Met: Lost days or near miss disclosures: The Company provides figures for the last five reporting years. [Sustainability Report 2018, 2019: nornickel.com] • Met: Fatalities disclosures: The Company provides figures for the last five reporting years. [Sustainability Report 2018, 2019: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Set targets for H&S performance • Not met: Met targets or explains why not
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"> • Met: Process to identify indigenous rights holders: The Company is committed to "preventing potential adverse effects on indigenous peoples by making management decisions with due regard to indigenous values and views at every stage of the mining and production cycle" and to "continuously communicating with indigenous peoples to safeguard their interests and meet their needs". [Indigenous Rights Policy, February 2018: nornickel.com & Sustainability Report 2018, 2019: nornickel.com] • Not met: How engages with communities in assessment: Although the Company reports supporting indigenous peoples in the North (Russia), no details found in relation to consultation and engagement in relation to assessments of operations impacts. [Sustainability Report 2018, 2019: nornickel.com & Indigenous Rights Policy, February 2018: nornickel.com] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to FPIC (or ICMM) • Not met: Gives recent example FPIC or dropping deal
D.3.6	Land rights (in own extractive operations, which includes JVs)	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: Approach to identification of land tenure rights holders • Not met: Describes approach to doing so if no recent deals <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How valuation and compensation works • Not met: Steps to meet IFC PS 5 in state deals • Not met: Describes approach if no recent deals
D.3.7	Security (in own extractive operations, which includes JVs)	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: How implements security (inc VPs or ICOC) • Not met: Example of respecting HRs in security • Not met: Ensures Business Partners follow security approach <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Assesses and involves communities • Not met: Working with local community
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	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: Action to prevent water and sanitation risks <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Water targets considering local factors • Not met: Reports progress in meeting targets and shows trends in progress made: Although the Company reports water consumption and measures taken in relation to monitoring wastewater, no evidence found of progress measured against targets made (which should take into consideration local communities' needs). [CSR report, 2016: nornickel.com]

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		No allegations meeting the CHRB severity threshold were found, and so the score of 12.12 out of 80 points scored in themes A-D & F has been applied to produce a score of 3.03 out of 20 points for theme E.

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	1.47 out of 4	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Norilsk Nickel made data public that met one or more elements of the methodology in 14 cases, leading to a disclosure score of 1.47 out of 4 points.
F.2	Recognised Reporting Initiatives	2 out of 2	The individual elements of the assessment are met or not as follows: Score 2 <ul style="list-style-type: none"> Met: Company reports on GRI: The CSR report includes a GRI index. [Sustainability Report 2018, 2019: nornickel.com]
F.3	Key, High Quality Disclosures	0 out of 4	Norilsk Nickel met 0 of the 10 thresholds listed below and therefore gets 0 out of 4 points for the high quality disclosure indicator. Specificity and use of concrete examples <ul style="list-style-type: none"> Not met: Score 2 for A.2.2 : Board discussions Not met: Score 2 for B.1.6 : Monitoring and corrective actions Not met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers Not met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) Discussing challenges openly <ul style="list-style-type: none"> Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts Not met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned Demonstrating a forward focus <ul style="list-style-type: none"> Not met: Score 2 for A.2.3 : Incentives and performance management Not met: Score 2 for B.1.2 : Incentives and performance management Not met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) Not met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

Disclaimer

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

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

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