Policy for accessing the Inside Information of **VK Company** (the "Company"), regulations on its confidentiality protection and control over compliance with the requirements of the Federal Law № 224-FZ “On prevention of illegal use of insider information and market manipulation, and amending certain legislative acts of the Russian Federation" dated July 27, 2010 and regulatory acts that were adopted in accordance therewith.   
(the “Policy”)

I. INTRODUCTION

This Policy provides guidance on the policy and practices adopted by the Company referring to the placement of Company's Global Depositary Receipts ("GDRs") on the MICEX-RTS Moscow Exchange. This Policy does not exclude or limit the Company's obligations in respect of confidentiality protection of the insider information and prevention of market manipulation, as set forth by the UK legislation with regard to offering the Company's global depositary receipts listed in the official list and inclusion thereof to the trading in the main market of the London Stock Exchange on November 11, 2010, subject to changes as effective from July 03, 2016.

This Policy includes the following sections:

1. Introduction
2. Scope of the Policy
3. Governing Law
4. Review of the legislative framework of the Russian Federation
5. Supervisory regime for the prosecution of market abuse
6. Restrictions on operations with Company’s securities
7. The Insider information and provisions on illegal transactions involving securities based on insider information
8. Provisions on the supervisory regime for the prosecution of market abuse
9. Liability
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22. Accountability towards the Company
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а. on a regular basis:

1. Announcement of preliminary annual results (if applicable)
2. Annual financial report
3. Publication of semi-annual report
4. Publication of quarterly reports (if applicable)
5. Interim management statements (if applicable)
6. Holding of Company's financial instruments
7. Sending notices as required:
8. Inside information
9. Notifications of changes in capital structure
10. Change of depository
11. Amendments to the Company's constitutional documents
12. Provision of major loans or guarantees or collateral in respect of such loans
13. Dealing with the Company's financial instruments
14. Duty of confidentiality
15. Access to the Company’s insider information, policy for protection of confidentiality and control over compliance with the requirements of the insider information laws

а. Company’s Officer

b. Guarantee of confidentiality of insider information of the Company

c. Restriction on the use of insider information and prohibition of market manipulation

1. **SCOPE OF THE POLICY**

Persons (including directors, senior managers and employees) getting an access to or possessing the insider information of the Company and/or any company where the Company owns (directly or indirectly) not less than 50% of the issued share capital (the "**Group**") shall comply with this Policy as mandatory. Section VII of this Policy shall also apply to persons closely affiliated with certain directors, senior managers and employees of the Company (**"PCAs**").

**The Company will communicate this Policy to all directors, senior managers and employees of the Group. This Policy is available on the Company's website. It is the responsibility of the relevant directors, senior managers and staff members to ensure that their PCAs are informed of the application of Section VII of this Policy to them.**

1. **GOVERNING LAW**
2. **Review of the legislative framework of the Russian Federation**

The legislative framework of the Russian Federation on insider information (the "**Insider information law**") includes:

* Federal Law No. 224-FZ “On prevention of illegal use of insider information and market manipulation, and amending certain legislative acts of the Russian Federation” dated 27.07.2010 (the "Insider Information Law"), which is the basic legislative act in the Russian Federation, which establishes a policy aiming at prevention, detection and preclusion of abuses within the on-exchange trading in the form of illegal use of insider information and (or) market manipulation, and provides for criminal and administrative liability for any violation of the established provisions, by modifying the relevant legal regulations;

* the legal acts of the Central Bank of the Russian Federation (the "Bank of Russia"), which shall regulate the financial service market and control over compliance with the Insider Information Law.

1. **Supervisory regime for the prosecution of market abuse**

The Insider Information Law prohibits any abuse within on-exchange trading in the form of misuse of insider information and/or market manipulation, which are considered as administrative breaches and/or criminal offences resulting, for example, from the misuse of non-public information, the distribution of which may have a material impact on the value of underlying shares or GDRs traded on a particular market, for example, on the MICEX-RTS Moscow Exchange. No matter whether the corresponding actions are made in the trading venue on any stock exchange or outside the exchange in any other part of the world. This regime is used to prevent transactions involving the Company's shares or GDRs based on insider information, improper disclosure of information [[1]](#footnote-1)by insiders and other market manipulations.

1. RESTRICTIONS ON TRANSACTIONS INVOLVING COMPANY’S SECURITIES

а. Insider information and provisions on illegal transactions involving securities based on the insider information

In accordance with the Insider Information Law, it is not allowed for a person who possesses accurate and specific information[[2]](#footnote-2) which is not in public domain and the distribution of which may have a material impact on the prices of financial instruments, foreign currency and/or commodities, to enter inter transactions involving financial instruments such as GDRs or shares related with such insider information. Disclosure of insider information in any other cases specified in Article 6 of the Law on Insider Information is also considered as a breach, save for proper performance of official duties.

*Definition of the Insider Information*[[3]](#footnote-3)

In accordance with the Insider Information Law, the Insider Information means precise and specific information that has not been distributed (including information constituting business, official, bank, communication secret (referring to the information on postal money transfers) and other secrets protected by law) and which distribution may have a significant impact on the prices of financial instruments, foreign currency and (or) commodities (including information relating to one or more issuers of equity securities, one or more management companies, investment funds, mutual funds and private pension funds or one or more financial instruments, foreign currency and (or) commodities).

1. Provisions on the supervisory regime for the prosecution of market abuse

The Law on Insider Information prohibits market manipulation actions, inter alia:

* willful distribution of knowingly fraudulent information through mass media, information and telecommunication networks, access to which is not limited to a certain set of persons (including the information and telecommunication network "Internet") or by any other means, resulting in a deviation of the price, demand, supply or trade volume of a financial instrument, foreign currency and/or commodities from the level or being at the level which significantly differs from that which would be if such information were not distributed;
* performance of transaction involving a financial instrument, foreign currency and/or commodities under a preliminary agreement between bidders and (or) their employees and (or) persons at whose expense or in whose interests the above transactions are performed, resulting in deviation of the price, demand, supply or trade volume of a financial instrument, foreign currency and/or commodities from a level or being at the level which significantly different from that which would be if such information were not distributed;
* other actions specified in Article 5 of the Insider Information Law.

1. Liability

A person liable for the misuse of insider information and/or market manipulation may be subject to an administrative fine, disqualification, forfeit, and/or imprisonment with or without deprivation of the right to hold certain positions or perform certain activities.

1. Provision of information to directors and senior managers

During the course of their employment, the Company's directors and senior managers are likely to be in possession of, amongst other things, quarterly and monthly updates on information referring to business performance, which are not publically available. Such information does not automatically qualify as insider information unless it is added to the list of insider information of the Company. The issue whether such information is insider information shall be carefully considered by addressees of such information on a case basis and all questions shall be forwarded to the Company.

**e. Providing information to employees**

If an employee's activity involves permanent or temporary (for the duration of the project) access to insider information, this employee should be included in the List of Insiders by an Official on the instructions of his functional manager. The Company assumes efforts to immediately include an insider in the list of insiders for the purpose of providing insider information to an employee only after his inclusion in the List of Insiders.

1. LIST OF INSIDERS

The List of Insiders will be kept and maintained by the Company's Officer.

а. Commitment to maintain the List of Insiders

The Company is obliged to maintain a list of directors, senior managers and employees (and any other persons who possess an access to insider information) who have an access to insider information (on a regular basis or occasional basis) directly or indirectly related to the Company (hereinafter referred to as "**List of Insiders**")[[4]](#footnote-4). The list of insiders must contain the information required by the applicable legislation to the Company. The List of Insiders must contain a section with information about permanent insiders who have a permanent access to all insider information and who are not included separately to other sections of the List of Insiders.

The List of Insiders is maintained in electronic form, updated and made available for at least five years from the date it was made or updated, whichever comes later (it is to note that when updating the List of Insiders, it is not allowed to delete any information from the list, and its previous versions must remain accessible). The list of insiders is provided to the organizer of the trade through which transactions with financial instruments, foreign currency and (or) goods are carried out, at his request, as well as at the request of the regulator in the field of financial markets in accordance with the procedure established by the legislation applicable to the Company.

The Bank of Russia may at any time demand that the Company shall immediately provide a copy of the List of Insiders.

1. Notice that the person is added to the List of Insiders

Persons included/excluded in/from the List of Insiders must be notified of this by an Official in accordance with the notification forms provided for by the legislation applicable to the Company.

1. Obligations of the persons added to the List of Insiders

In addition to other obligations set forth by the Insider Information Law and this Policy, the person added to the List of Insiders is obliged to:

1. provide the Company with the necessary information to include a person in the insider list;
2. get acquainted with the Company's documents and newsletters related to the person as an insider;
3. inform the Company's Officer in advance of his/her intention to communicate the insider information to a person, which not included on the List of the Insiders;
4. notify the Company's Officer of any changes in his/her personal data (e.g. change of name, place of residence, passport data).

If the person to whom the insider information is to be communicated is a director or employee of the Company or Group, data of such person shall be informed to the Company's Officer. In any case, the Company's Officer must be informed of any transfer of insider information indicating the first and last name (in case of transfer of insider information to an individual), the name and address of the company, the phone number of the recipient of insider information (in case of transfer of insider information to a legal entity), as well as the legal grounds for the transfer of insider information. If insider information is transferred to a legal entity on the basis of an agreement concluded by the Company with such a legal entity, then it is necessary to specify all the data of the legal entity necessary to include it in the list of insiders of the Company, as well as to ensure that such a legal entity fulfills its obligations (contractual or otherwise) to (a) maintain its own list of persons who have access to insider information of the Company and (b) provide such a list at the request of the Company.

Insider information may be transferred to legal entities on the basis of concluded contracts after the inclusion of these persons in the list of insiders of the Company.

1. CLOSED PERIODS
2. Application

This Section VI shall apply to all Directors (as this term is defined in Section VII(a)), persons with a supervisor responsibility, senior managers and group employees (the **"Restricted persons**").

1. Closed periods [[5]](#footnote-5)

Closed periods applied to the Company, are indicated in the Company’s corporate calendar; currently, the below Closed periods apply:

* a period from 1 January until the Company makes a preliminary announcement of its annual results;
* a 30-days period last preceding the publication of the Company's annual financial statement;
* a 30-days period last preceding the publication of the interim (semi-annual report, quarterly, or other) financial statements by the Company; and
* period from December 25 through the end of the year inclusively.

с. Restrictions within the Closed Periods

During the Closed Periods listed above, the Restricted persons are not allowed to perform the following actions in relation to the Company's securities:

* to acquire, dispose of or otherwise enter into agreements to acquire or otherwise dispose of ordinary shares (or class A shares, if applicable) or GDRs;
* to enter into a contract (including a contract for price differences) with a purpose to secure a profit or avoid losses as a result of ordinary shares price fluctuations (or class A shares, as appropriate) or GDRs;
* to transfer, exercise or redeem any option (to buy or sell, or both) to acquire or sell ordinary shares (or class A shares as appropriate) or GDRs (for the avoidance of doubt, the Company may grant options to Restricted persons throughout this period subject to certain conditions); or
* to use as collateral ordinary shares (or class A shares, as appropriate) or GDRs or grant a security interest or other encumbrance related thereto;
* to enter into other transactions, directly or indirectly, for their own account or for the account of a third party, referring to any of the Company's shares or GDRs or debt instruments, or derivatives or other financial instruments related thereto.

An exception to the above restriction may be made if the Restricted Person, well ahead of the first day of the relevant Closed Period, drew up and agreed with the Company’s Officer a "trading plan" and the Company’s Officer confirmed that transactions under such plan are permitted during the Closed Periods. "**Trading plan**" is a written plan between a Restricted Person and an independent third party that specifies the strategy to buy or sell the Company's securities and (a) sets out the volume, price and date of the securities which will be used in the transactions, or (b) grants an independent third party the right, at its sole discretion, to determine the data in paragraph (a), or (c) includes a written formula or algorithm for determining the data in paragraph (a).

The Company’s Officer shall develop the procedure of notification of the Restricted persons of the first day of Closed Periods and notify them accordingly.

The Restricted person willing to make transactions involving the Company's securities during the Closed Periods must apply to the Company’s Officer who will consider the exceptional circumstances on a case-by-case basis.

1. Restrictions outside Closed Periods

Outside the Closed Periods, the Restricted persons must not do any of the above with respect to the Company’s securities if it violates any applicable law (including supervisory regime for prosecution of market abuse).

1. DISCLOSURE OF TRANSACTIONS INVOLVING THE COMPANY'S FINANCIAL INSTRUMENTS
2. Application

As part of its listing procedure on the London Stock Exchange, the Company published a Prospectus dd. November 05, 2010 as amended on June 29, 2015, as well as the new edition of the Prospectus dated March 26 , 2021, which included disclosure of the beneficial ownership of each of the Directors individually in relation to the Company ("**Directors**"), as well as the beneficial ownership of the Company's senior managers, the Company's secretary and other employees on an aggregate basis.

1. Accountability towards the Company

The Company is entitled to request information from the Company’s insiders included in the list of the Company's insiders on transactions made by them (or PCAs) with the Company's financial instruments and on entering into the contracts that are derivative financial instruments and which price depends on such financial instruments of the Company.

Directors and other persons with a supervisor responsibility (as the term is defined below) are required, withinthe period specified in the Company's request, which must be at least 10 (ten) business days from the date of receipt of the request by the insider, to report to the Company on any transactions entered into on their behalf which involve the Company's securities or GDRs or derivative or other financial instruments related thereto[[6]](#footnote-6).

The person with a supervisor responsibility is a director or a senior manager of the Company who: (a) has regular access to inside information referring directly or indirectly to the Company; and (b) is authorized to make managerial decisions affecting the Company's future development and commercial prospects (the “**Person discharging managerial responsibilities**”). The Company’s Officer will notify each Person discharging managerial responsibilities(except Directors, as they all are considered as Persons with a supervisor responsibility) of the granting of this status.

A PCA is a person who is closely affiliated with the relevant Director or Person discharging managerial responsibilities, i.e.:

(a) spouse or civil partner;

(b) A child or stepchild under the age of 18 who is unmarried (unmarried) and does not have a civil partner;

(c) a relative who has held a common household with the Director or Person discharging managerial responsibilities for at least one year as of the date of the relevant Dealing; or

(d) a legal entity, trust or partnership which management duties are performed by a Director or a person with a supervisor responsibility, or by a person referred to in paragraphs (a), (b) or (c) of this definition, which is directly or indirectly controlled by such person or entity which is set up for the benefit of that person or which has an economic interest which is substantially equal to the interest of such person.

Every Director and Person discharging managerial responsibilitiesshall:

* provide the Company with a list of all PCAs and keep it updated as necessary to ensure that it is relevant - the Company will maintain a basic list of all PCAs; and
* notify all its PCAs in writing of their obligations under this Policy and keep a copy of such notification - the Company may provide a letter which may be used for such purposes.

1. Information which is to be included in the report

Each report on transactions made by insiders (including Directors, Persons with a supervisor responsibility or PCAs) involving securities of the Company and on entry into contracts which are derivative financial instruments and the price of which depends on such securities, which is sent by an insider of the Company, must be issued in accordance with the form specified in Exhibit A. Each Director and Person discharging managerial responsibilitiesshall ensure that his or her PCAs provide all necessary notifications.

The Company’s Officer is an appropriate contact person for the Company to disclose such information.

1. Disclosure by the Company of transactions involving the Company's financial instruments

Upon receipt of a report on the performed transaction in accordance with the above requirements, the Company shall notify RIS and the authorized information agency accordingly, and will make a relevant announcement on its website.

Furthermore, as part of the Company's periodic disclosures of annual statements, the Company discloses information on each Director's share and aggregate interest share held by senior managers, the Company's Secretary and other Group employees. With respect to such disclosures, the above persons may be notified in advance of the date of the relevant disclosure and are required to confirm their beneficial interest in the Company.

1. DISCLOSURE OF INFORMATION BY THE COMPANY

а. On a regular basis

1. *Announcement of preliminary results of activities (if applicable)*

If the Company selects to publish preliminary year-end results, it is obliged to publish such activity data through RIS and an authorized information agency under its obligation to disclose the inside information directly related to its activity, unless Company is entitled to extend the term for such disclosure.

1. *Annual financial report*

The Company is obliged to publish its annual financial report as soon as possible after it is approved, but not later than four months after the end of the respective financial period (until April 30). The annual report shall include: (a) the audited consolidated financial statements, (b) the management report, including the corporate governance report, and[[7]](#footnote-7) (c) the respective statement. The annual report and other interim financial statements are published through RIS and the authorized information agency, and are also posted on the Company's website on the page “Investor Relations”. ”.

1. *Publication of semi-annual report*

The Company shall draw up and issue semi-annual reports at the latest by September 30[[8]](#footnote-8). Semi-annual reports shall also be posted on the web page “Investor Relations” on the Company's website.

1. *Publication of quarterly reports (if applicable)*

The Company is not obliged to prepare quarterly reports. However, if the Company prepares such reports, it is obliged to publish them through RIS and an authorized information agency under its obligation to disclose the inside information directly related to its activities, unless Company is entitled to extend the term for such disclosure.

Quarterly reports, if prepared, shall also be posted on the web page “Investor Relations” on the Company's website.

1. *Interim management statements (if applicable)*

The Company is not obliged to prepare interim management reports. However, if the Company prepares such interim reports, it is obliged to publish them through RIS and an authorized information agency under its obligation to disclose the inside information directly related to its activities, unless Company is entitled to extend the term for such disclosure.

Interim management reports, if prepared, shall also be posted on the web page “Investor Relations” on the Company's website.

1. *Holding of Company's financial instruments*

As set forth in Section VII(d) above, the Company occasionally discloses the individual shareholdings of Directors in the Company. The Company also discloses its aggregate interests held by the Company's senior managers, secretaries and employees as part of its financial statements in the same format as in the Issued Prospectus. Furthermore, every six months the Company discloses the number of ordinary shares represented by GDRs for the previous six months.

1. Sending notices as required
2. *Inside information*

The Company shall notify the RIS and the authorized information agency as soon as practicable of any inside information[[9]](#footnote-9) directly related to the Company, unless the Company is entitled to extend the term for such disclosure. The Managing Director and/or the Chief Financial Officer shall notify the Audit Committee of the Board of any decision to extend the term for the disclosure of the inside information. The Company will in any case be considered as compliant with this Policy, if certain circumstances or events occur, even if not formalized definitively, it shall notify RIS and the authorized information agency as soon as practicable[[10]](#footnote-10).

The Company will post the disclosed information on its website, on the web page " Investor Relations", after sending a notice to RIS and the authorized information agency.

1. *Notifications of changes in capital structure*

The Company shall notify the RIS and the authorized information agency of any changes in its capital structure (including any new increase in the block listing) as soon as practicable and shall place the relevant information on the web page “Investor Relations” on its website.

1. *Change of depository*

The Company shall also notify RIS and the authorized information agency about changes in the depository and post the relevant information on the web page “Investor Relations” on its website as soon as practicable.

1. *Amendments to the Company's constitutional documents*

The Company shall notify RIS and the authorized information agency of any changes in its Deed of Incorporation and/or Articles of Association and shall post the relevant information on the web page “For Investors” on its website as soon as practicable.

1. *Provision of major loans or guarantees or collateral in respect of such loans*

The Company shall notify RIS and the authorized information agency of the granting of new major loans or warranties or collateral in respect of such loans and shall post the relevant information on the web page “Investor Relations” on its website as soon as practicable.

1. *Dealing in the Company's financial instruments*

As specified in Section VII(d) above, the Company will disclose individual transactions of Directors, Person discharging managerial responsibilitiesand PCAs of whom it is notified.

1. DUTY OF CONFIDENTIALITY

Subject to Section X, the Restricted persons shall maintain the confidentiality of all confidential information they receive (relating to the Company or third parties) and shall not use or disclose such information without proper authorization.

The Company (and other persons) may use legal safeguards against such persons in case of any breach of their obligation of confidentiality, including compensation for losses incurred.

**X. ACCESS TO COMPANY INSIDE INFORMATION, POLICY OF CONFIDENTIALITY PROTECTION AND CONTROL OVER COMPLIANCE WITH THE REQUIREMENTS OF INSIDE INFORMATION LAWS**

a. **Company’s Officer**

1. The Company’s Officer is appointed by the Audit Committee of the Board.

2. The Company’s Officer exercises control over compliance with the laws on the inside information, including the maintenance of the List of insiders.

3. Directors, senior managers and employees of the Company shall direct all questions that they may have regarding this Policy and the recommendations contained therein to the Company’s Officer.

**b. Guarantee of confidentiality of Inside information of the Company**

1. Persons possessing the Company's Inside information undertake to:

* maintain confidentiality of the Inside information which they obtained, inter alia - make sure that the Inside information is kept in a manner that prevents any access of third parties to such information;
* in the event of loss of the status of a person possessing an access to Inside information, transfer to the Company all data storage media at their disposal containing inside information;
* immediately report to the Company about the loss or lack of documents, files containing the inside information, keys to safe boxes (vaults), passes, passwords or in the event of detection of unauthorized access to the Inside information, etc.;
* comply with restrictions on the use of the Inside information.

2. The confidentiality requirement also applies to persons who were removed from the List of Insiders until the information received by such persons ceases to be the inside information.

3. The Company shall make sure that measures aimed at protecting the confidentiality of the Inside information are implemented, inter alia:

* to keep records of persons who possess the Inside information;
* to provide an access or limited access to the Inside information of the Company's employees under their labor contract's, contract partners under the civil law contracts;
* to timely destroy all documents and other media that may contain the Inside information;
* to use of systems of protection of the information-technical systems against any loss of the information and unauthorized (including accidental) access to the Inside information, including through communication channels;
* not to allow discuss the issues referring to the Inside information in places where the information may be available for third parties.

4. Any person who has no access to the Company's inside information but obtained the said information due to any circumstances shall:

* immediately stop reading this information;
* take measures to maintain the confidentiality of the Inside information, inter alia - refrain from sharing or distributing such Inside information among third parties;
* comply with the restrictions and prohibitions as set forth by the law on the Inside information and the Company's Policy and regulations, including this Policy.

5. Persons possessing the Inside information (both insiders and persons not added to the list of insiders but distributing the Inside information or making transactions with financial instruments of the Company using the Inside information) are held liable for its illegal use.

6. The Company and/or persons who incurred losses as a result of illegal use of the Inside information have the right to demand on a compensation for such losses from the guilty persons for the illegal use and/or distribution of the Inside information.

**c. Restriction on use of Inside information and prohibition of market manipulation**

1. It is not allowed to use the Company's Inside information:

* in for personal advantage (for mercenary purposes) or in the interests of third parties;
* to perform transactions in financial instruments, foreign currency and (or) commodities to which the inside information relates, at its own expense or at the expense of a third party, save for the transactions referring to the fulfillment of the obligation to buy or sell financial instruments, foreign currency and (or) commodities, which is due, if such obligation arose as a result of the transaction performed before such person became aware of such inside information;
* by communicating it to another person, save for cases of communication of this information to the person included in the list of insiders in connection with performance of duties established by federal laws or performance of labor duties or performance of the contract;
* by giving recommendations to third parties, binding or otherwise inducing them to buy or sell financial instruments, foreign currency and (or) commodities.

2. It is not allowed to perform market manipulation activities resulting in deviation of the price, demand, supply or trade volume of a financial instrument, foreign currency and (or) commodities from a level or those maintenance at the level which significantly differs from that which would be if such information were not distributed;

**Exhibit A**

**Form of report on transactions involving financial instruments of the Company**

|  |  |  |
| --- | --- | --- |
| **1** | **Information on the person with a supervisor responsibility / person closely affiliated with him/her** | |
| a) | Given Name | *[For individuals: first and last name.]*  *[For legal entities: full name, including the legal form specified in the commercial register, if the legal entity is registered, if applicable].* |
| b) | Position/status | *[For persons with a supervisor responsibility: job title, e.g. Executive Director, Financial Director].*  *[For PCAs, indicate that the notice refers to a person who is closely affiliated with the Person discharging managerial responsibilities and the name and position of the relevant Person discharging managerial responsibilities].* |
| c) | *Initial notification/change* | *[Specify that the notice is the original notice or an amendment to the previous notice. In case of change, it is necessary to specify the error that is rectified by the new notification].* |
| **2** | **Information on the transaction: this section shall be repeated for (i) each type of instrument; (ii) each type of transaction; (iii) each date; and (iv) each location where the transactions were effected.** | |
| a) | Description of financial instrument | *[Specify the nature of the instrument, e.g. share, debt instrument, derivative or financial instrument linked to a share or debt instrument].* |
| b) | Nature of transaction | *[Description of the transaction type, e.g. buy, sell, subscription, contract for price difference].*  *[Specify whether the trace is related to the execution of the option program].*  *[If the transaction is entered into in accordance with the investment program or transaction plan, please indicate this and inform about the date when the respective investment program or transaction plan came into effect].* |
| c) | Price and volume | |  |  | | --- | --- | | Price | Volume | |  |  |   *[If several transactions of the same kind are performed on the same day and in the same place (buy, sell, etc.) involving the same financial instrument, the prices and volumes of such transactions shall be specified in this field, in a table of two columns as indicated above by adding the required number of lines. Do not specify the aggregate figures of the deals and do not subtract the figures of one deal from the other to calculate the net amount).* |
| d) | Aggregate information  - Comprehensive Income  - Price | *[Volumes of several transactions are aggregated when such transactions:*  *- refer to the same financial instrument;*  *- refer to the same type;*  *- are made end on one and the same date; and*  *- are made in the same place]*  *[Please specify unit of measurement for quantity]*  *[Please s*pecify*:*  *- in the event of one transaction, the price of one transaction;*  *- in the event of indication of an aggregate volume of several transactions: a weighted average price of combined transactions].*  *[Indicate currency]* |
| e) | Date of operation | *[Date of transaction on which the notice is sent.*  *Using the date format: YYYY-MM-DD; and specify time zone].* |
| f) | Place of transaction | *[Specify the name of the trading venue where the transaction was made. If the transaction was not made on the trading venue, specify in this paragraph “outside a trading venue”.* |

1. Definition "Insider Information" is provided in section IV (a). [↑](#footnote-ref-1)
2. The Company shall publish the information which is subject to disclosure on a regular basis through the Authorized Information Service ("**RIS**") or on own website (see the web page "For Investors" on the Company's website) and in the news of a news agency accredited by the Bank of Russia to conduct actions on disclosure of information about securities and other financial instruments. Directors, senior managers and employees shall check through RIS, the Company's website and the authorized information agency whether the information is in public domain or not. [↑](#footnote-ref-2)
3. For more information, please contact the company’s officer for compliance with the Company's Policy and regulations ("**Company's Officer**"). [↑](#footnote-ref-3)
4. [↑](#footnote-ref-4)
5. These are periods established by the Company, inter alia - to perform proper activities which go beyond specific MAR requirements (Management and Administration). [↑](#footnote-ref-5)
6. This includes the acquisition or disposal of shares or GDRs, including the exercise of options, transactions involving derivatives and other financial instruments related thereto, pledges or grants of shares, and transactions on behalf of the respective Director, a Person with a supervisor responsibility or a Closely Affiliated Person. [↑](#footnote-ref-6)
7. As an alternative to the attachment of the corporate governance report to the management report, the Company may disclose the required information in an individual report which is published together with its annual report using the same methods as for annual statements; or (ii) in a document which is available for general public on the Company's website to which a reference in the management report is given. [↑](#footnote-ref-7)
8. Though the applicable law does not provide for the submission of semi-annual reports, the market expects that reports will be submitted. [↑](#footnote-ref-8)
9. Definition "Insider Information" is provided in section IV (a). [↑](#footnote-ref-9)
10. For more detailed information, please contact the Company’s Officer. [↑](#footnote-ref-10)