



ЕВРОХИМ

Открытое акционерное общество «Минерально-химическая компания «ЕвроХим»

APPROVED

by Decision of the Board of Directors of
EuroChem MCC, OJSC
(Minutes No. 11.09.15-13/10-9 of 15.09.2011)

INSIDER INFORMATION & TRADE REGULATIONS
EuroChem Mineral & Chemical Company, OJSC

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Moscow, 2011

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1. INTRODUCTION

- 1.1. These Insider Information Regulations (“Regulations”) have been drawn up in line with the requirements set out in the Russian Federal Law on Joint-Stock Companies, the Russian Federal Law on the Securities Market, the Russian Federal Law on Countering the Unlawful Use of Insider Information and Market Manipulation, and amendments made to other Russian Federal laws, the company Charter, and other internal regulatory documents of EuroChem Mineral and Chemical Company, OJSC (“EuroChem”), as well as the recommendations set out in the Code of Corporate Conduct and the statutory documents issued by the Federal Securities Commission and the Federal Financial Market Service of Russia, and requirements posed by the trading organizers on the securities market (collectively hereinafter referred to in these Regulations as current law, standards, and requirements).
- 1.2. EuroChem has adopted these Regulations in order to:
 - Comply with legal requirements governing the use of information on the securities market and prevent market manipulation;
 - Reinforce investor and shareholder trust in EuroChem and its management team, and high ethical and corporate governance standards;
 - Protect the rights and lawful interest of shareholders and investors engaged in transactions with EuroChem-issued securities;
 - Enforce control over the distribution and disclosure of information considered insider information in line with legal requirements;
 - Set out the procedures by which EuroChem insiders may conduct transactions with securities;
 - Exercise control over the activities of parties who have access to insider information based on set restrictions for the use and distribution of insider information and liability for the violation of said restrictions;
 - Define the rights and responsibilities of the parties governing the use of EuroChem’s insider information.

2. TERMS AND DEFINITIONS

- 2.1. **Insider Information:** precise and specific information that has not been distributed or presented (including information that constitutes a commercial, service, banking, or communications secret — including information about postal cash transfers — and other secrets protected under law), the distribution or presentation of which could potentially have a material impact on the value of the financial instruments, foreign currency and (or) commodities, or any information included in Appendix 2 to these Regulations;
- 2.2. **Insider:** a person who has access to insider information under law, or as provided for in another statutory legal act, job description, or another EuroChem internal regulatory document, or under contract with EuroChem. The following are EuroChem insiders:
 - a) members of the EuroChem Board of Directors;
 - b) members of the EuroChem Revision Commission;
 - c) the General Director (or Chief Executive Officer)
 - d) the members of the Management Board;
 - e) EuroChem employees and other issuers who have access to insider information due to their official duties;
 - f) persons with access to insider information due to the fact that they carry out professional obligations to EuroChem and other issues under a civil contract;
 - g) news agencies that deal in the disclosure or presentation of company information;
 - h) other private persons and legal entities with access to insider information, including the persons temporarily performing the functions of the above-listed parties, auditors, legal, financial, and other consultants, the stock registrar, depositories, and other parties.
- 2.3. **Insider Trade:** when insiders or other parties — in one’s own interests or the interests of a third party — engage in transactions with securities using insider information, and the transfer to third parties or the distribution of insider information, when said information has been made available in violation of the insider’s fiduciary obligations to maintain confidentiality, or if the information was obtained without any lawful basis for such.
- 2.4. **Market Manipulation** refers to:
 - the distribution of inaccurate information or information that could mislead securities market participants, including the spreading of rumors and unreliable news about the company, other issuers, or securities

when the party spreading said information was informed or should have been informed that the information is unreliable or could mislead securities market participants;

- the execution of a transaction by a person or group of parties with securities aimed at creating active trades or the perception of active trading of securities, an increase or decrease in the value of securities in order to motivate other securities market participants to drive up demand or supply of said securities;
- the execution of transactions by a party or group of parties with securities at unjustifiably inflated or lowered prices, save for instances in which said party or group of parties may provide a justification or evidence that said transactions comply with accepted securities market transaction practices and current legal requirements;
- the execution of transactions with securities using any practices, means, or methods that are of fraudulent nature, misleading, or defrauding the participants of securities markets with regard to the securities;
- the execution of any other actions which result in changes to the price, demand, supply or volume of securities trades from a level, or maintaining them at a level that significantly differs from the level that would have been achieved without said actions.

2.5. **Presentation of information:** actions aimed at making information available to a specific circle of parties in line with Russian Federal securities legislation.

2.6. **The distribution of information** includes the following actions:

- aimed at making information available to a specific circle of people or transferring information to a certain circle of people, including via its disclosure in line with Russian federal securities legislation.
- related to the publication of information in media outlets, including electronic, open-access networks (including the Internet);
- related to the distribution of information via shared IT networks (incl. the Internet).

2.7. **Insider Information Law** – Federal Law No. 224-FZ (of 27.07.2010) on countering the unlawful use of insider information and market manipulation and related amendments to specific legislative acts of the Russian Federation.

2.8. **Securities:** this term means stock or other securities and the rights thereto of the company and other issuers (if not otherwise provided for in the Regulations) included in the list of Securities managed by the company's Compliance Officer in line with these Regulations.

2.9. **Other Issuers:** this term is used in relation to the company's subsidiaries and dependent companies, its affiliate issuers, and Russian and foreign legal entities, current, former, and potential counter parties of the company and their affiliates, existing confidential information about the operations of which became known to the Insider during the course of the fulfillment of the Insider's official duties.

2.10. **Blackout period:** a period of time during which insider transactions with company securities may not be conducted.

3. PREVENTATIVE MEASURES AGAINST THE UNLAWFUL USE OF INSIDER INFORMATION

3.1. The company will take the following steps to prevent, identify, and intercept the unlawful use of insider information and (or) market manipulation:

- develop and adopt a list of information constituting insider information compiled in line with legal requirements, statutory acts issued by federal executive authorities on the securities market and decisions made by the company's Board of Directors. A list of information categorized by the company as insider information can be found in the Appendices to these Regulations;
- oversee measures aimed at maintaining the confidentiality of insider information, including a permit-based access system and an information security system for technical systems and communications;
- maintain a list of insiders and will be disclosed in line with legal requirements;
- set out the obligations for compliance with the procedures for using insider information and liability for the violation of said procedures in internal regulatory documents, and employment and other contracts.
- create mandatory conditions for insiders to ensure that they comply with the established procedures for using insider information;
- hold parties responsible in line with the provisions for such when they violate the procedures for using insider information and demand compensation of losses incurred by the company as the result of said parties' violation of the insider information usage procedures;
- set out restrictions for insiders as defined in sub-points a-e of point 2.2 of these Regulations with regard to the execution of transactions with securities up to prohibiting said transactions during blackout periods;
- take other actions toward ensuring that the insider information usage procedures are enforced and exercise control over compliance with legal requirements and these Regulations.

4. INSIDER RESPONSIBILITIES

- 4.1. Insiders are not permitted to directly or indirectly transfer insider information to any person who may conduct transactions with securities based on said information. Insider information should not be transferred to any third parties, save for situations related to the insider's execution of his official duties and meeting compliance with the requirements set out in current law.
- 4.2. Insiders may not give third parties any recommendations based on insider information regarding the execution or non-execution of any transactions with securities.
- 4.3. Insiders may not conduct transactions with securities using insider information; insider information may not be used to obtain any unjustifiable benefits.
- 4.4. For the purposes of the company's control over the use of insider information, when insiders (as defined in sub-points a-e of point 2.2 of these Regulations) conduct transaction with securities, the insiders must comply with special procedures for conducting transactions with securities, as provided for in these Regulations.
- 4.5. Insiders must notify the company and the Federal Financial Market Service of the execution of any transactions with company-issued securities within 10-days of such.
- 4.6. In order to ensure the confidentiality of insider information, insiders must take the requisite steps and actions of caution in the interests of restricting access to insider information that is not public information and ensure that it is not disclosed. These steps and preventative measures include:
 - maintaining the confidentiality of the process involved in preparing and executing company transactions;
 - holding business and public events in such a way so as to rule out the risk of unintentional disclosure of insider information;
 - reviewing confidential documents in public places exclusively in ways that do not allow unauthorized persons to view said documents;
 - restricting access to documents (including to electronic files) containing insider information that is not public to private persons based on whether or not they need said information in order to perform their job properly (including in order to enforce control over the distribution of documents and document drafts);
 - immediately collecting and deleting all confidential documents and other materials from conference and meeting rooms after meetings are finished;
 - destroying all confidential documents and other papers when they are no longer needed for business or legal purposes, using a shredder when appropriate;
 - restricting access to the premises where confidential documents or non-public insider information may be stored;
 - prohibiting any discussion of non-public insider information in places where that information may be overheard by others, for example: in elevators, restrooms, entryways, restaurants, planes, and taxicabs.

5. THE COMPLIANCE OFFICER

- 5.1. In order to meet compliance with the law, and in order to exercise effective control over the actions set out in these Regulations, the company is to appoint an officer whose zone of responsibility will include exercising control over compliance with the requirements set out in the Insider Information Law, related statutory legal documents, and these Regulations;
- 5.2. The Compliance Officer is to perform his (her) function in accordance with the standards of Russian federal legislation, the Charter, these Regulations, rulings passed by the GM and the Board of Directors and the company's internal organizational and regulatory documents.
- 5.3. The decision to appoint a Compliance Officer (or relieve him of his duties), and the assignment of the Compliance Officer's functions is to be performed by the General Director with pre-approval from the Board of Directors.
- 5.4. The Compliance Officer is to report directly to the Board of Directors.
- 5.5. The Compliance Officer's functions are:
 - overseeing maintenance of the list of securities and its timely updating per the instructions of the company's CFO; reporting information about any changes to the securities list to company insiders, as defined in sub-points a-f of point 2.2 of these Regulations;

- overseeing the appropriate and timely review of insider requests to locate particular securities in the securities list, and requests to conduct transactions with securities; oversee the preparation of a substantiated positive or negative reply to requests and delivering said response to insiders by the established deadline;
- oversee the maintenance of the insider list;
- oversee the notification of parties included on the insider list in keeping with the current procedures provided for by law of their inclusion on and removal from the list, and provide an explanation to said parties of the legal requirements made of insiders and current restrictions;
- oversee the submission of the insider list to trade organizers via which transactions with securities are conducted, and to authorized federal executive authorities in the field of financial markets at their request;
- oversee the disclosure of the list of insider information on the company's website;
- at the rest of insiders, provide assistance in preparing reports of insider transactions with securities that have been conducted for delivery to the company and the Federal Financial Market Service;
- keep records and oversee the archiving of documents related to the enforcement of these Regulations, including:
 - the list of the company's insiders;
 - notifications to those included on the insider list of their inclusion in or removal from the insider list;
 - the written consent of private individuals included on the insider list and their personal data as submitted to trade organizers;
 - copies of requests submitted by insiders and the reply thereto confirming the execution of the provisions set out in these Regulations;
- submit a report to the Board of Directors on compliance with the requirements of these Regulations and carrying out measures aimed at countering the unlawful use of insider information and market manipulation;
- informing the Chairman of the Board of Directors and the General Director of violations of procedures, the supervision of which falls within the zone of responsibility of the Compliance Officer, including any actions or failure to act on the part of any company officers.
- performing other functions in line with these Regulations and the company's internal regulatory documents.

5.6. The Compliance Officer is authorized to:

- send requests to and receive information from insiders (and others acting on their behalf) regarding information about insider transactions with securities;
- set a blackout period for conducting transactions with securities in cases envisaged in these Regulations;
- refuse approval for an insider transaction with securities during a blackout period without any explanation;
- initiate an investigation if the Compliance Officer learns of an insider trade or an instance of securities market manipulation, and report to executive bodies and the company's Board of Directors regarding the insider trade or securities market manipulation and the results of the investigation;
- request and receive information from company officers as needed in order to perform the Compliance Officer's functions;
- with the consent of the General Director or the managers of the company's relevant divisions, involve Company experts in the preparation of responses to insider requests and the preparation of documents that fall within the Compliance Officer's terms of reference;
- keep records of correspondence concerning issues referred to the Compliance Officer, and submit notes on the receipt of correspondence, requests and inquiries from the shareholders indicating the date and time of the company's receipt of said documents.

5.7. The Compliance Officer must ensure the confidentiality of insider transactions with securities, save for cases in which the information is subject to mandatory disclosure in line with current law.

5.8. The Company must provide the conditions for the independent and effective performance by the Compliance Officer of his functions.

5.9. In the absence of a Compliance Officer (vacation, business trip, or illness), his rights, authorities, and obligations, as set out in these Regulations, are to be transferred to a Deputy Compliance Officer, who is to be appointed by the General Director with pre-approval from the Board of Directors.

6. SPECIAL PROCEDURES FOR TRANSACTIONS

- 6.1. In order to prevent insider trading and market manipulation, these Regulations set out the following procedures for conducting transactions with securities for Insiders, as defined in sub-points a-e of point 2.2 of these Regulations:
- If an insider intends to conduct a transaction with securities issued by other Issuers, he or she must promptly receive approval from the Compliance Officer, i.e., no later than 2 (two) business days prior to the proposed transaction execution date.
 - A request for the approval of a one-time transaction with securities issued by other Issuers (“Request”) submitted to the Compliance Officer in writing (including via fax or email), must contain information about the amount and nature of the proposed transaction. The standard Request form is included in Appendix 1 to these Regulations.
 - The Compliance Officer must review the terms of the proposed transaction within a maximum of 24 hours upon receipt of the written Request, and issue a response in line with the requirements set out in these Regulations and current law, and deliver the response to the Insider who sent the Request;
 - If the response is negative, the Compliance Officer, in addition to issuing the appropriate response, must also indicate the reason for the negative response and cite the appropriate requirement set out in these Regulations and/or current law, with the exception during blackout periods as established in these Regulations.
 - Within 2 (two) business days from execution of the transaction with securities issued by other Issuers, insiders must report a transaction to the Compliance Officer by any means available.
- 6.2. If the Insider does not have accurate information about the location of a particular security on the securities list, in order to avoid violating any procedures via the execution of transactions with securities, the insider must request information from the Compliance Officer prior to executing any transactions with said security to locate the security on the securities list.

7. BLACKOUT PERIODS

- 7.1. As the company’s quarterly financial results constitute information that, if disclosed, could have a material impact on the market value of company-issued securities, these Regulations hereby stipulate the following blackout periods during which insiders are prohibited from conducting any transactions with securities, and are obliged to do everything possible to prevent the execution of said transactions by the family members of insiders.

- 7.2. Quarterly blackout periods:

(the announcement of reports in line with Russian accounting standards (RAS)):

- the period beginning 60 days prior to publication of RAS reports for the previous year and ending 48 hours after publication;
- the period beginning 30 days prior to the end of the second business day after the publication of the 1Q RAS reports;
- the period beginning 30 days prior to the end of the second business day after the publication of the 2Q RAS reports;
- the period beginning 30 days prior to the end of the second business day after the publication of the 3Q RAS reports.

(the announcement of quarterly IFRS reports):

- the period beginning 60 days prior to the issue of a press release announcing IFRS reports for the previous year and ending 48 hours after the press release is published;
- the period beginning 30 days prior to the end of the second business day after the publication of the press release announcing the 1Q IFRS reports;
- the period beginning 30 days prior to the end of the second business day after the publication of the press release announcing the 2Q IFRS reports;
- the period beginning 30 days prior to the end of the second business day after the publication of the press release announcing the 3Q IFRS reports.

- 7.3. Event-specific blackout periods:

From time to time, company operations require an event, and if information is disclosed about said event, it could have a material impact on the value of securities. As a result, the Compliance Officer is authorized to set an event-specific blackout period.

The length of the event-specific blackout period is set depending on the date of the official information disclosure date.

Information about an event-specific blackout period and the reasons for it is confidential. The Compliance Officer may inform insiders of the event-specific blackout period only if and when the insider submits a request for a securities transaction approval. Nevertheless, during an event-specific blackout period, the Compliance Officer is authorized to refuse approval for a transaction with securities without providing a reason why.

- 7.4. In order to ensure the quality performance by the Compliance Officer of his functions, company employees must promptly inform the Compliance Officer of any planned or potential events, the disclosure of which could have a material impact on the value of securities.
- 7.5. If the Compliance Officer intends to conduct a transaction with securities, he or she must promptly receive approval from the company's General Director, i.e., no later than 2 (two) business days prior to the proposed transaction execution date.

8. LIABILITY

- 8.1. Any person who engages in the unlawful use of insider information is liable in keeping with Russian federal law.
- 8.2. Any person who has engaged in the unlawful use of insider information by intentionally spreading false information is not liable for the unlawful use of insider information if said person was not aware or should not have been aware that said information constituted insider information and the information that was shared was known to be false.
- 8.3. The company may demand that insiders who have engaged in the unlawful use of insider information compensate any losses incurred by the company due to said unlawful actions.
- 8.4. With regard to insiders, as defined in sub-points a-h of point 2.2 of these Regulations, the company may impose disciplinary measures up to and including termination. The decision(s) regarding said disciplinary measures are to be taken in line with Russian federal law and the company's internal regulatory documents.

9. CLOSING PROVISIONS

- 9.1. These Regulations are to be approved by the company's Board of Directors. Amendments and addenda to these Regulations will be made in line with decisions taken by the Board of Directors.
- 9.2. In the event that Russian federal law is amended and the company Charter or provisions in other internal regulatory documents come to contradict federal law, then said provisions will lose force, and federal law will take precedence until such time as these Regulations are amended accordingly.

**APPROVAL REQUEST FOR A ONE-TIME SECURITIES TRANSACTION
EuroChem MCC, OJSC, and other Issuers**

Important: Please deliver this request directly to the Compliance Officer in person, or by fax to (+7-495-795-2527* [____]) no later than 2 business days prior to the proposed transaction date.

Full Name _____
 Position _____
 Division _____
 Contact Information _____
 Telephone _____ Fax _____ e-mail _____
 Transaction information _____
 Proposed _____ Type (purchase/sale) _____
 transaction date _____
 Type of securities (common/pref shares / DR / other) _____
 Quantity of securities _____

I, _____, hereby confirm that (i) I do not possess any insider information (as defined in the EuroChem MCC Insider Information Regulations) and (ii) to the best of my knowledge, the proposed transaction described above does not come into violation of any of the provisions of current law, standards, or requirements (as defined in the EuroChem MCC Insider Information and Trading Regulations). I confirm my understanding that if I engage in insider trading, I can be held accountable via the imposition of sanctions by the company and face civil, administrative, and/or criminal liability.

Signature: _____ Date: _____

RESOLUTION

This securities transaction is
APPROVED / NOT APPROVED
 by EuroChem MCC’s Securities Transactions Compliance Officer

Signature: _____ Date: _____

LIST OF INSIDER INFORMATION

- 1) regarding the announcement and convention of a general meeting of the issuer's shareholders (GMs), and decisions taken at GMs;
- 2) the convention of meetings of the company's Board of Directors and the meeting agenda, as well as the decisions issued by the Board of Directors;
- 3) cases in which the Board of Directors does not take the following decisions, which should be taken under federal law:
 - calling an annual (regularly scheduled) company GM, and any other decisions related to the preparations, convention, and holding of the annual (regular) company GM;
 - calling (convening) or refusal to call (convene) an extraordinary GM (EGM) at the request of the revision commission, the auditor, or a shareholder (shareholders) who hold at least 10% of the company's voting stock;
 - regarding the inclusion or exclusion of items submitted for an agenda for a company GM or the nominated candidates on the list of candidates to be elected to a EuroChem MCC body when nominated by a shareholder (shareholders) who cumulatively own at least 2% of the company's voting stock;
 - instituting the position of the company General Director, either via two consecutive meetings of the company's Board of Directors or over the course of two months from the date on which the authorities of the previous General Director expired or were terminated in the circumstances provided for in Article 69(6) of the Federal JSC Law No. FZ-208 of 26.12.1995);
 - the early termination of the authorities of the company's General Director via two consecutive meetings of the company's Board of Directors in the circumstances provided for in Article 69(7) of the Federal JSC Law;
 - calling (convening) a company EGM if the number of members of the company's Board of Directors becomes less than the number required for a quorum;
 - instituting a temporary position of the company General Director and holding an EGM in order to resolve the issues concerning the early termination of the authorities of the General Director or the managing company (individual) and making the arrangements for a new General Director, or transferring the General Director's authorities to a managing company (individual) if and when the Board of Directors or takes the decision to suspend the authorities of its General Director or the authorities of the managing company (individual);
- 4) regarding the company's submission of statements on the state registration of: reorganization, cessation of operations, or liquidation of the company, and in the event that the government registration agency turns down registration of said event, then the information about said refusal;
- 5) regarding the appearance of an organization controlled by the company which is very significant for the company, and the termination of any grounds for exercising control over said organization;
- 6) the appearance of any entity controlling the company and the termination of the grounds for control;
- 7) decisions made in favor of reorganization or liquidation of an organization that controls the company, that is under the control of the company, or that is significant to the company, or an entity that has issued a guarantee on the company's bonds;
- 8) the submission by an organization controlling the company, under control of the company, that is significant to the company, or a party that has extended a guarantee on the company's bonds, of a statement to file entries with the Common State Register of Legal Entities regarding the reorganization, termination of operations, or liquidation of said organization;
- 9) if an entity that controls the company, that is under the company's control, that is of high significance to the company, or that has issued a guarantee for the company's bonds, begins to show any signs of instability (bankruptcy) as set out in the Russian federal law on bankruptcy.
- 10) any ruling issued by a court of arbitration that finds the company, its controlling entity, an entity under its control, an entity of high significance to the issuer, or a party that has issued a guarantee on company bonds, to be bankrupt, and any ruling issued by a court of arbitration on the recognition of said entities' bankrupt status, initiation of bankruptcy procedures for said entity, and the termination of said entities' bankruptcy proceedings;

- 11) any lawsuit against the company, the company's controlling organization, an organization controlled by the company, an organization of high significance to the issuer, or an entity that has issued a guarantee on the company's bonds, when the demands of the lawsuit amount to or exceed 10% of the book value of said organization's assets as of the last date of the reporting period (quarter, year) preceding the filing of the lawsuit for which the deadline for submitting accounting (financial) reports has expired, or another lawsuit, the ruling on which, according to the opinion of the company, could have a material impact on the financial and/or business standing of the company or other above-listed entities.
- 12) the date on which the list of holders of the company's registered securities or documentary registered payable-to-bearer, centrally stored securities in order to exercise the rights granted by said securities;
- 13) the adoption by the company's authorized bodies of any of the following decisions:
 - the placement of securities by the company;
 - approval of decisions on the issue (additional issue) of company securities;
 - approval of a prospectus for company securities;
 - the date on which the placement of company securities is to take place;
- 14) the completion of a company securities issue;
- 15) submission by the company of a request for government registration of a(n) (additional) securities issue, registration of a securities prospectus, registration of any changes made to a decision on a(n) (additional) securities issue and (or) to the securities prospectus, or government registration of the securities issue report (or report on an additional issue);
- 16) the submission by the company of a notification on the results of a securities issue (additional issue);
- 17) the decision of a court of arbitration finding a security issue (or additional issue) invalid or expired;
- 18) the maturity of company securities;
- 19) calculated and (or) paid income on company securities;
- 20) the company's conclusion of a contract with a Russian trade organizer on the securities market for the inclusion of the company's securities on the list of securities eligible for trading by the Russian trade organizer on the securities market, and contracts with a Russian stock exchange on the listing of the company's securities on the Russian stock exchange;
- 21) the company's conclusion of a contract to include its securities or the securities of another issuer granting rights with regard to the company's securities on the list of securities eligible for trade on foreign organized (regulated) financial markets, as well as contracts with foreign stock exchanges on the listing of said security on a foreign stock exchange;
- 22) listing the company's securities or the securities of a foreign issuer that grant rights with regard to the company's securities on the list of securities eligible for trade on a foreign-organized (regulated) financial market, and the removal of said securities from said list, and the listing of said securities (or removal) from a foreign stock exchange;
- 23) the company's conclusion of a contract to support (stabilize) the prices of the company's securities (or the securities of a foreign issuer that grant rights with regard to the company's securities) and the termination of said contract;
- 24) the submission by the company of a request to obtain a permit from the federal executive securities market authorities to place and (or) organize the circulation of its securities outside of the Russian Federation;
- 25) the failure to carry out the company's obligations to the holders of its securities;
- 26) the acquisition by a party or the termination of a party's rights to directly or indirectly (via its controlled entities) independently or collectively with other affiliated parties under a property trust management contract and (or) a simple partnership, and (or) instructions, and (or) a shareholder agreement, and (or) other agreement, the subject of which is exercising rights granted by stocks (stakes) of the company to hold a certain number of votes via voting stock (stakes) comprising the authorized capital of the company if said quantity of votes amounts to 5% or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75, or 95% of the total amount of votes offered via voting stock (stakes) constituting the company's authorized capital;
- 27) any offers received by the company in line with Section XI.1 of the Federal JSC Law (26.12.1995, No. 208-FZ), i.e., any voluntary, including competitive or mandatory offer for the purchase of the company's securities, and any changes made to said offers;

- 28) any notification received by the company in line with Section XI.1 of the Federal JSC Law regarding the right to demand the repurchase of the company's securities or a demand to purchase the company's securities;
- 29) the identification of any errors in previously disclosed or submitted in the company's accounting (financial) reports, if said errors may have a material impact on the value of the company's securities;
- 30) the execution by the company or another party that has extended a guarantee on the company's bonds, of transactions valued at 10% or more of the book value of the assets of the company or said other party as of the last day of the reporting period (quarter, year) preceding the execution of the transaction for which the established deadline for inclusion in the accounting (financial) reports has already passed;
- 31) the execution by an organization controlling the company, or an organization under the control of the company, or an organization that is of significance to the company, of transactions that are defined by Russian federal law as a large transaction;
- 32) the execution by the company of a transaction with interest and the need for approval thereof by an authorized management body of the company as stipulated by Russian Federal law, if the amount of said transaction exceeds RUB 200 mln or amounts to 2% or more of the book value of the company's assets as of the ending date of the reporting period (quarter, year) preceding the approval of the transaction by the authorized management body of the company, and if said transaction is not approved by an authorized management body of the company prior to execution as of the ending date of the reporting period (quarter, year) preceding the company's execution of said transaction with regard to which the established deadline for submitting accounting (financial) reports has passed;
- 33) changes to the structure and (or) amount of the collateral on bonds issued by the company with deposit guarantees, and if changes are made to the structure and (or) amount of the subject of the collateral on the bonds issued by the company with mortgage collateral, then information about said changes, if they arose as the result of a change in any guarantee mortgage requirements comprising the mortgage collateral of the bonds, or a substitution of other property comprising the mortgage coverage of the bonds, the value (cash value) of which amounts to 10% or more of the amount of the mortgage collateral of the bonds;
- 34) changes to the value of the assets of an entity that has issued a guarantee for the company's bonds if the change is 10% or more or another important, in the company's view, change in the financial or business standing of said party;
- 35) the acquisition by the company or the termination of the company's rights to directly or indirectly (via its controlled entities) independently or collectively with other affiliated parties under a property trust management contract and (or) a simple partnership, and (or) instructions, and (or) a shareholder agreement, and (or) other agreement, the subject of which is exercising rights granted by stocks (stakes) of the company that are listed as eligible for trade by a trade organizer on the securities market, or the value of assets of which exceed RUB 5 bln, to hold a certain number of votes via voting stock (stakes) comprising the authorized capital of the issuer if said quantity of votes amounts to 5% or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75, or 95% of the total amount of votes offered via voting stock (stakes) constituting the issuer's authorized capital;
- 36) the acquisition by a party or the termination of a party's rights to directly or indirectly (via its controlled entities) independently or collectively with other affiliated parties under a property trust management contract and (or) a simple partnership, and (or) instructions, and (or) a shareholder agreement, and (or) other agreement, the subject of which is exercising rights, granted by stocks (stakes) in the organization extending a guarantee on bonds issued by the company, to hold a certain number of votes via voting stock (stakes) comprising the authorized capital of the issuer if said quantity of votes amounts to 5% or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75, or 95% of the total amount of votes offered via voting stock (stakes) constituting the issuer's authorized capital;
- 37) the conclusion by the company, the company's controlling organization or an organization under the control of the company of a contract that stipulates the obligation to acquire the company's securities;
- 38) the acquisition or suspension of actions, renewal of actions, reformation, or recall (annulment) or termination on other grounds of the company's permit (license) to perform certain operations which are of financial and business significance for the company;
- 39) the expiration of the authorities of the General Director and (or) members of the company's Management Board;

- 40) changes to the amount of stakes held in the company's equity (pooled) capital and that of its significant controlled organizations;
 - parties that are members of the Board of Directors, members of the company's Management Board, and other parties that hold the office (perform the functions) of the company's General Director;
 - persons who are members of the Board of Directors, members of the Management Board, and persons who hold the office (perform the function) of the General Director of a managing organization in the event that the authorities of the company's General Director are transferred thereto;
- 41) the emergence and (or) termination of the rights of company bond holders to call their bonds;
- 42) the appointment or replacement of organizations that provide the company with intermediary services for the company to meet its obligations on its bonds or other securities, specifying their full name, location, and the amount of the compensation for said services, as well as any changes to these details;
- 43) any dispute related to the institution of the company, the management thereof or participation therein, if the decision on said dispute may have a material impact on the value of the company's securities;
- 44) making demands of a party that has extended a guarantee for the company's bonds with regard to the execution of obligations on said bonds;
- 45) the placement outside of the Russian Federation of bonds or other financial instruments used as collateral for debt obligations, the execution of which is to be conducted at the company's expense;
- 46) the acquisition (or transfer of title / ownership rights) to voting stock in the company or securities of a foreign issuer granting rights in relation to the company's voting stock, by the company and (or) any companies under the company's control, save for controlled organizations that act as brokers and (or) asset managers and executed a transaction on their own behalf, but at the expense of a client that is not the company and (or) an organization under its control;
- 47) any information that is submitted or presented by the company to the appropriate body (or appropriate organization) of a foreign country, a foreign stock exchange and (or) other organizations in line with foreign law in order to perform information disclosure or make a presentation for foreign investors in line with the placement or circulation of the issuer's securities outside of the Russian Federation, including via the acquisition of a placed issue of the securities of a foreign issuer in line with foreign securities laws;
- 48) the company's annual or interim (quarterly) accounting (financial) reports, including the aggregate annual or interim accounting report (consolidated financials);
- 49) a condition for placing securities as set out in an approval by an authorized body of the company in a decision on conducting an (additional) issue of securities, if:
 - the securities are being placed for trades arranged by a trade organizer on the securities market;
 - an additional issue of securities if said security issue, with regard to which the issued securities are an additional issue permitted to be traded as arranged by a trade organizer on the securities market or with regard to which a request has been filed to allow them to be traded as arranged by a trade organizer on the securities market;
- 50) the contents in the company reports (notice) approved by the appropriate authorized body on the results of a security issue if:
 - the securities are being placed for trades arranged by a trade organizer on the securities market;
 - an additional issue of securities if said security issue, with regard to which the issued securities are an additional issue permitted to be traded as arranged by a trade organizer on the securities market or with regard to which a request has been filed to allow them to be traded as arranged by a trade organizer on the securities market;
- 51) the contents of a securities prospectus approved by an authorized body of the company, except for information that was previously disclosed or submitted in line with the provisions of the Russian Federal Securities Law;
- 52) the contents of the company's quarterly reports, signed by an authorized body of the company, except for information that was previously disclosed or submitted in line with the provisions of the Russian Federal Securities Law;
- 53) the contents of the company's annual reports, signed by an authorized body of the company, except for information that was previously disclosed or submitted in line with the provisions of the Russian Federal Securities Law.