



Information for SberBank's insiders

According to Federal Law 224-FZ of July 27, 2010 “On countering illegal use of insider information and market manipulation” (hereinafter “224-FZ”) the Bank has developed the measures to prevent unlawful use of insider information and market manipulation.

The persons which are in the list of Bank's insiders (hereinafter “the Insiders”) must comply with following rules and requirements for the protection of insider information:

- do not use the insider information for making transactions with financial instruments, foreign currency and/or commodities, to which insider information relates, at their own expense or at expense of a third party;
- do not use the insider information by transferring it to another person;
- do not use the insider information by providing recommendations to, obliging or otherwise encouraging third parties to buy or sell financial instruments, foreign currencies, and/or commodities;
- do not take actions related to market manipulation in accordance with the applicable legislation.

According to 224-FZ the Bank developed the Rules for making transactions with financial instruments which are also apply to the Bank employees.

If you are insider – employee of the Bank and are going to carry out personal transaction, it is necessary to:

- fill in the Certification Form with information on the presence/absence of brokerage/investment accounts;
- check presence of prohibition to carry out personal transactions (deals) with financial instruments put on the Restricted List;
- check presence of Prohibited Periods for carrying out transactions (deals) with the Bank's financial instruments, set for insiders of the Bank as a

securities issuer;

- obtain preliminary approval from your immediate manager and Compliance Department and send an approved
- send a report if personal transactions (deals) with the regulated financial instruments were carried out on external brokerage and depository accounts (opened out of the Bank).

More detailed information about the rules for carrying out personal transactions, indicating the resources and lists used, is available on the corporate portal in the Compliance section.