



Information for Bank'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") and EU Regulation No 596/2014 of 16 April, 2014 on market abuse (hereinafter "the EU Regulation") 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 requirements under 224-FZ and the EU Regulation.

The Insiders are prohibited from:

- Using insider information when performing the transactions;
- Providing third parties with insider information;
- Manipulating the market.

According to 224-FZ, the Insiders must notify the Bank about their transactions with Bank's securities and derivatives on Bank's securities within ten (10) business days from the date of such transaction in case they are:

- members of the Supervisory Board, members of the Executive Board, person acting as a sole executive body (including a temporary sole executive body), and/or members of the Bank's Audit Committee;
- individuals who have access to insider information of the Bank and organizations which put the Bank in their list of insiders due to employment and/or civil agreements concluded with the Bank.

Notifications about transactions performed by insiders not listed above shall be sent to the Bank ONLY upon its request. The Insider may also receive a request about the performed transactions from the Bank of Russia. Upon receiving such a request, the Insider shall send a notification about the transactions performed to the appropriate addressee\corresponding recipient within ten (10) business days from the date of receiving the request (demand, order). The insider may\has the right to provide information on several transactions in one notification. The terms and conditions of each transaction shall be specified separately.

The following forms of Notifications and examples of how to fill them in are attached:

[Notification Form on a transaction](#)

[Notification Form on a transaction \(an example of how to fill in the form\)](#)

[Notification Form on a transaction \(more than one\)](#)

[Notification Form on a transaction \(more than one\) \(an example of how to fill in the form\)](#)

The detailed information on financial instruments of the Bank, about which the Insider shall notify the Bank upon performing a transaction, is in the **Section “Investor Relations” / “Share profile” / “Debt profile”**.

The address and delivery mode to notify the Bank about the transactions performed:

1. The address: 19, Vavilova St., Moscow, the Russian Federation, 117997.
2. Notifications must be delivered to the Bank's mailroom\correspondence division (a delivery against signature of an authorized person) to the above address; or
3. They can be sent by registered mail with delivery notification\with the acknowledgement of receipt to the above postal address; or
4. They can be sent in the electronic format signed with an electronic signature as provided by the Russian legislation.

The following Russian and EU legislation is applied:

- Federal Law 224-FZ of July 27, 2010 “On countering illegal use of insider information and market manipulation amending certain legislative acts of the Russian Federation”;
- Order by the Federal Financial Markets Service 13-51/pz-n of June 18, 2013 “On approval of the Provisions governing the notification of individuals and entities about including them in the list of insiders and excluding\removing from the list, the Provisions on presenting\the submission of the list of insiders to trade organizers, that perform transactions with financial instruments, foreign currencies and (or) commodities, the Provisions on the procedure and terms for providing notifications by insiders about their transactions”;
- Regulation of the European Union of 16 April 2014 596/2014 on market abuse (market abuse regulation)\ on countering unscrupulous practices in the financial market.

Contact Information

If the Insiders have any questions concerning the current legislation on countering of illegal usage of insider information and market manipulation, please make a request to the e-mail address: insider@sberbank.ru.

If you became aware of any improper usage\illegal use of insider information, you must report it to the Bank by sending a letter to the e-mail address: insider@sberbank.ru.

The Insiders must remember that they are liable for every violation of requirements regarding countering of illegal use of insider information and market manipulation under the applicable law of the RF and the EU.