

## **List of Insider Information of Sberbank**

### **1. Insider information of the Bank as a securities issuer<sup>1</sup>**

1.1. The insider information of the Bank as a securities issuer shall include the following information:

1.1.1. On convening and holding of the general meeting of members (shareholders) of the Bank, including the agenda, the date of holding, the date of drawing up the list of persons entitled to participate in the general meeting, as well as on resolutions adopted by the general meeting of members (shareholders) of the Bank.

1.1.2. On the agenda of the meeting of the Supervisory Board of the Bank, and on resolutions adopted.

1.1.3. On the facts of failure by the Supervisory Board of the Bank to adopt the following resolutions that should be adopted in accordance with federal laws:

- on convening of the annual (regular) general meeting of shareholders of the Bank as a business entity, as well as on other resolutions related to preparation, convening and holding of the annual (regular) general meeting of shareholders of the Bank;
- on convening (holding) of, or refusing to convene (hold), an extraordinary general meeting of shareholders of the Bank as requested by the Audit Commission of the Bank, the Bank's auditor, or shareholder(s) owning not less than 10 percent of voting shares of the Bank;
- on inclusion or refusal to include the issues on the agenda of the general meeting of shareholders of the Bank, and nominated candidates to the list of candidates for voting at the elections to the relevant body of the Bank, who are nominated by shareholder(s) which, in aggregate, own(s) at least two percent of voting shares of the Bank;
- on the formation of the sole executive body of the Bank, at two consecutive meetings of the Supervisory Board of the Bank or within two months from the date of termination or expiration of powers of the previously formed sole executive body of the Bank in the case provided for by clause 6 of article 69 of the Federal Law No. 208-FZ dated December 26, 1995 "On Joint Stock Companies" (Collected Legislation of the Russian Federation, 1996, No. 1, art. 1; No. 25, art. 2956; 1999, No. 22, art. 2672; 2001, No. 33, art. 3423; 2002, No. 12, art. 1093; No. 45, art. 4436; 2003, No. 9, art. 805; 2004, No. 11, art. 913; No. 15, art. 1343; No. 49, art. 4852; 2005, No. 1, art. 18; 2006, No. 1, art. 5, art. 19; No. 2, art. 172; No. 31, art. 3437, art. 3445, art. 3454; No. 52, art. 5497; 2007, No. 7, art. 834; No. 31, art. 4016; No. 49, art. 6079; 2008, No. 18, art. 1941; 2009, No. 1, art. 23; No. 19, art. 2279; No. 23, art. 2770; No. 29, art. 3642; No. 52, art. 6428; 2010, No. 41, art. 5193; No. 45, art. 5757; 2011, No. 1, art. 13, art. 21; No. 30, art. 4576; No. 48, art. 6728; No. 49, art. 7024, art. 7040; No. 50, art. 7357; 2012, No. 25, art. 3267; No. 31, art. 4334; No. 53, art. 7607; 2013, No. 14, art. 1655; No. 30, art. 4043, art. 4084; No. 45, art. 5797; No. 51, art. 6699; No. 52, art. 6975; 2014, No. 19, art. 2304; No. 30, art. 4219) (hereinafter - Federal Law "On Joint Stock Companies");

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<sup>1</sup> The list of which is established by a regulatory act of the Bank of Russia

- on early termination of the powers of the sole executive body of the Bank, at two consecutive meetings of the Supervisory Board of the Bank in the case provided for by clause 7 of article 69 of the Federal Law “On Joint-Stock Companies”;
- on convening (holding) of an extraordinary general meeting of shareholders of the Bank, in case the number of members of the Supervisory Board of the Bank is less than the number making up the quorum for holding of the meeting of the Supervisory Board of the Bank;
- on formation of a temporary sole executive body of the Bank, and on holding of an extraordinary general meeting of shareholders of the Bank to resolve the issue of early termination of the powers of its sole executive body or management company (manager), and on formation of a new sole executive body of the Bank or delegation of the powers of its sole executive body to a management company (manager), in case the Supervisory Board of the Bank adopts the resolution to suspend the powers of its sole executive body or management company (manager);
- on recommendations on a voluntary, including competing, or mandatory offer received by the Bank, which includes an assessment of the proposed price of acquired issue-grade securities and possible change in their market value after acquisition, an assessment of the plans of the person who sent the voluntary, including competing, or mandatory offer in respect of the Bank, including with respect to its employees.

1.1.4. On sending by the Bank of an application for entry of records into the Unified State Register of Legal Entities related to reorganization, termination of activities or liquidation of the Bank, and in case the body conducting state registration of legal entities resolves to refuse to enter these records - information of such resolution.

1.1.5. On appearance of the organization controlled by the Bank, which is of significant importance to it, as well as on termination of any grounds for control over such organization.

1.1.6. On appearance of the entity controlling the Bank, as well as on termination of any grounds for such control.

1.1.7. On making the decision on the reorganization or liquidation by an organization controlling the Bank, an organization controlled by the Bank which is of significant importance to it, or by a person providing security for the Bank’s bonds, if in respect of the person who provided such security and (or) the bonds for which it was provided, the conditions provided for by clause 1.4 of this List of Insider Information of Sberbank (hereinafter – the List) are observed;

1.1.8. On the submission by an organization controlling the Bank, an organization controlled by the Bank which is of significant importance to it, or by a person providing security for the Bank’s bonds, if conditions provided for by clause 1.4 of this List are observed in respect of the person who provided such security and (or) the bonds for which it was provided, of an application for entry of records related to the reorganization, termination of activities or liquidation of the specified organizations into the Unified State Register of Legal Entities.

1.1.9. On the emergence of signs of insolvency (bankruptcy), provided for by the legislation of the Russian Federation on insolvency (bankruptcy), in the Bank, an organization controlling it, an organization controlled by the Bank which is of significant importance to it, or a person providing security for the Bank’s bonds, if conditions provided for by clause 2.4 of this List are observed in respect of the person who provided such security and (or) the bonds for which it was provided.

1.1.10. On acceptance by an arbitration court of an application to recognize the Bank, a person controlling it, an organization controlled by the Bank which is of significant importance to it, or a person

providing security for the Bank's bonds, if conditions provided for by clause 1.4 of this List are observed in respect of the person who provided such security and (or) the bonds for which it was provided, as bankrupt, as well as on adoption by an arbitration court of a decision to recognize these persons as bankrupt, start or terminate bankruptcy proceedings regarding them.

1.1.11. On filing a lawsuit against the Bank, an organization controlling it, an organization controlled by the Bank which is of significant importance to it, or a person providing security for the Bank's bonds, if conditions provided for by clause 1.4 of this List are observed in respect of the person who provided such security and (or) the bonds for which it was provided, the amount of claims for which is 10 or more percent of the book value of assets of the said persons as of the end date of the last completed reporting period preceding the filing of the lawsuit, or any other lawsuit, the satisfaction of which, in the opinion of the Bank, may significantly affect the financial and business position of the Bank or the said persons.

1.1.12. On the date as of which the persons entitled to exercise the rights under issue-grade securities of the Bank are determined, including the date as of which the list of persons entitled to participate in the general meeting of shareholders of the Bank is drawn up, if conditions provided for by clause 1.3 of this List are observed.

1.1.13. On adoption of the following decisions by the authorized bodies of the Bank, if the conditions provided for in clause 1.2 of this List are observed:

- on placement of issue-grade securities of the Bank;
- on the start date of placement of issue-grade securities of the Bank;
- on suspended placement of issue-grade securities of the Bank;
- on refusal to place issue-grade securities of an (additional) issue of the Bank;
- on full (partial) termination of obligations on principal payment, unpaid interest, and pecuniary sanctions for default on subordinated bonded loans;
- on unilateral refusal to pay interest (coupon) on subordinated bonded loans.

1.1.14. On completion of placement of issue-grade securities of the Bank, if the conditions provided for in clause 1.2 of this List are observed.

1.1.15. On sending (filing) by the Bank of an application for state registration of (additional) issue of issue-grade securities, registration of the securities prospectus, state registration of the bond program, state registration of any amendments made to the resolution on (additional) issue of issue-grade securities and(or) to their prospectus, state registration of any amendments to the bond program, the terms of (additional) issue of bonds and(or) their prospectus under the bond program, state registration of the report on the results of (additional) issue of issue-grade securities, if conditions provided for by clause 1.2 of this List are observed.

1.1.16. On sending (filing) of the issuer's notification on the results of the issue (additional issue) of issue-grade securities, if conditions provided for by clause 1.2 of this List are observed.

1.1.17. On resolution of any arbitration court to recognize (additional) issue of issue-grade securities of the Bank invalid.

1.1.18. On redemption of issue-grade securities of the Bank, if the conditions provided for in clause 1.3 of this List are observed.

1.1.19. On accrued and (or) paid income on issue-grade securities of the Bank, if the conditions provided for in clause 1.3 of this List are observed.

1.1.20. On conclusion by the Bank of the agreement with the Russian trading organizer on admission of issue-grade securities of the Bank to organized trading by the Russian trading organizer, as well as the agreement with the Russian stock exchange on admission of those to listing on the Russian stock exchange.

1.1.21. On conclusion by the Bank of the agreement on admission of issue-grade securities of the Bank or securities of a foreign issuer, that certify the rights in respect of issue-grade securities of the Bank, to trading in the foreign organized (regulated) financial market, as well as the agreement with a foreign stock exchange on admission of such securities to listing on the foreign stock exchange.

1.1.22. On admission of issue-grade securities of the Bank or securities of a foreign issuer, that certify the rights in respect of issue-grade securities of the Russian Bank, to trading in the foreign organized (regulated) financial market, and on nonadmission of such securities thereto, as well as on admission/nonadmission of such securities to listing on a foreign stock exchange.

1.1.23. On conclusion by the Bank of an agreement on maintenance (stabilization) of prices for issue-grade securities of the Bank (securities of a foreign issuer that certify rights in respect of issue-grade securities of the Bank), on the conditions, including termination, of this agreement, if conditions provided for by clause 1.3 of this List are observed.

1.1.24. On filing by the Bank of an application for permission of the Bank of Russia to place and (or) arrange circulation of its issue-grade securities outside the Russian Federation.

1.1.25. On default on obligations of the Bank to the holders of its issue-grade securities.

1.1.26. On acquiring by the person or terminating the person's right, directly or indirectly (through the persons under its control), independently or jointly with other persons related to it by any property trust management agreement and(or) partnership agreement and(or) agency agreement and(or) shareholder agreement and(or) other agreement, the subject of which is exercise of the rights certified by stocks (shares) of the Bank, to dispose of a certain number of votes attributable to voting stocks (shares) constituting the authorized capital of the Bank, if this number of votes amounts to five percent or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attributable to voting stocks constituting the authorized capital of the Bank.

1.1.27. On receipt by the Bank, in accordance with Chapter XI.1 of the Federal Law On Joint-Stock Companies, of any voluntary, including competing, or mandatory offer to purchase its issue-grade securities, as well as on any changes made to these offers.

1.1.28. On receipt by the Bank, in accordance with Chapter XI.1 of the Federal Law On Joint-Stock Companies, of the notice of the right to demand redemption of issue-grade securities of the Bank, or the demand for redemption of issue-grade securities of the Bank.

1.1.29. On identification of errors in previously disclosed accounting (financial) statements of the Bank, if such errors may materially affect the price of issue-grade securities of the Bank.

1.1.30. On conclusion of a transaction by the Bank or a person providing security for the Bank's bonds, if conditions provided for by clause 1.4 of this List are observed in respect of the person who provided such security and (or) the bonds for which it was provided, the amount of which is 10 or more percent of the book value of assets of the Bank or said person as of the end date of the last completed reporting period preceding the conclusion of the transaction.

1.1.31. On making by the organization controlling the Bank, or the organization controlled by the Bank, which is of significant importance to it, the transaction recognized as a major one in accordance with the laws of the Russian Federation.

1.1.32. On conclusion of a related party transaction by the Bank, if the amount of such transaction is equal to:

- for the cases when the book value of assets of the Bank as of the end date of the latest completed reporting period preceding the adoption of the resolution to accept the transaction by the authorized management body of the Bank, and if no resolution to accept the transaction is adopted, then as of the end date of the latest completed reporting period preceding the settlement of such transaction by the Bank, is at most 100 billion rubles, - is over 500 million rubles or two or more percent of the book value of assets of the Bank as of the date specified in this paragraph;
- for the cases when the book value of assets of the Bank as of the end date of the latest completed reporting period preceding the adoption of the resolution to accept the transaction by the authorized management body of the Bank, and if no resolution to accept the transaction is adopted, then as of the end date of the latest completed reporting period preceding the settlement of such transaction by the Bank, exceeds 100 billion rubles, - is one or more percent of the book value of assets of the Bank as of the date specified in this paragraph;

1.1.33. On changes in the composition and (or) amount of the subject of pledge for bonds of the Bank with collateral, if conditions provided for by clause 1.4 of this List are observed in respect of such bonds, and in the event of changes in the composition and/or amount of the subject of pledge for bonds of the Bank with mortgage collateral - information on such changes, if they are caused by the replacement of any mortgage-backed claim that constitutes mortgage collateral of bonds, or by substitution of other property constituting mortgage collateral of bonds, the cost (monetary estimation) of which is 10 or more percent of the amount of the mortgage collateral of the bonds.

1.1.34. On changes in the value of assets of a person providing security for the Bank's bonds, if conditions provided for by clause 1.4 of this List are observed in respect of the person who provided such security and (or) the bonds for which it was provided, which amount to 10 or more percent, or on another significant change, in the opinion of the Bank, in the financial and economic status of such a person.

1.1.35. On acquiring by the Bank or terminating the Bank's right, directly or indirectly (through the persons under its control), independently or jointly with other persons related to the Bank by any property trust management agreement and(or) partnership agreement and(or) agency agreement and(or) shareholder agreement and(or) other agreement, the subject of which is exercise of the rights certified by stocks (shares) of the organization with the issue-grade securities admitted to organized trading or with the cost of assets exceeding five billion rubles, to dispose of a certain number of votes attributable to voting stocks (shares) constituting the authorized capital of this organization, if this number of votes amounts to five percent or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attributable to voting stocks (shares) constituting the authorized capital of such organization.

1.1.36. On the acquisition by a person or termination of a person's right directly or indirectly (through the persons under its control) independently or jointly with other persons associated with it by a trust management agreement, and (or) a simple partnership agreement, and (or) an agency agreement, and (or) shareholder agreement, and (or) other agreement, the subject of which is the exercise of rights, certified by stock (shares) of the organization which provided security for the Bank's bonds, if conditions

provided for by clause 1.4 of this List are observed in respect of the person who provided such security and (or) the bonds for which it was provided, to dispose of a certain number of votes attributable to voting stock (shares) constituting the authorized capital of such an organization, if the specified number of votes is five percent or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes assigned to the voting stock (shares) of the authorized capital of such an organization.

1.1.37. On conclusion by the Bank, its controlling entity, or an organization controlled by the Bank, of a contract providing for the obligation to purchase issue-grade securities of the Bank, if conditions provided for by clause 1.3 of this List are observed.

1.1.38. On receipt, suspension, renewal, reissue, revocation (cancellation) or termination for other grounds, of the permit (license) of the Bank for conduct of specific activities which are of significant financial and economic importance to the Bank.

1.1.39. On expiration of the powers of the sole executive body and (or) members of the collegial executive body of the Bank.

1.1.40. On any change in the amount of share in the authorized capital of the Bank and the organizations controlled by the Bank, which are of significant importance to it:

- persons which are members of the board of directors (supervisory board), members of the collegial executive body of the Bank, as well as the person which holds the office of (serves as) the sole executive body of the Bank;
- persons which are members of the board of directors (supervisory board), members of the collegial executive body of the management company, as well as the person which holds the office of (serves as) the sole executive body of the management company, in case the powers of the sole executive body of the Bank have been delegated to the management company.

1.1.41. On creation and(or) termination of the right of holders of the Bank's bonds to demand early repayment of the Bank's bonds they own from the Bank, if conditions provided for by clause 1.3 of this List are observed.

1.1.42. On attracting or replacing organizations that provide the Bank with intermediary services in the performance of obligations by the Bank pertaining to the bonds or other issue-grade securities of the Bank, indicating their names, locations and remuneration for the services provided, as well as on changing the specified information.

1.1.43. On any dispute related to set-up of the Bank, its management or participation in it, if the settlement of this dispute may materially affect the price of issue-grade securities of the Bank.

1.1.44. On asserting claims against a person providing security for the Bank's bonds, if conditions provided for by clause 1.4 of this List are observed in respect of the person who provided such security and (or) the bonds for which it was provided, related to the fulfilment of obligations on such bonds.

1.1.45. On placement outside the Russian Federation of bonds or other financial instruments that certify the borrowing obligations to be fulfilled at the expense of the Bank.

1.1.46. On acquiring (alienating) any voting shares of the Bank or securities of a foreign issuer that certify rights in respect of voting shares of the Bank, by the Bank and (or) organizations controlled by the Bank, with the exception of organizations controlled by the Bank which are brokers and (or) trustees

and have concluded the transaction in their own name, but at the expense of a customer other than the Bank and (or) an organization controlled by it.

1.1.47. Forwarded or provided by the Bank to the relevant body (corresponding organization) of a foreign country, foreign exchange and(or) other organizations in accordance with foreign law for the purposes of its disclosure or provision to foreign investors in connection with placement or circulation of issue-grade securities of the Bank outside the Russian Federation, including through the acquisition of securities of a foreign issuer being placed (already placed) in accordance with foreign law, if such information may materially affect the price of issue-grade securities of the Bank.

1.1.48. Constituting the annual accounting (financial) statements and consolidated financial statements of the Bank, as well as the one contained in the audit reports prepared in respect of these statements.

1.1.49. Constituting the interim accounting (financial) statements and consolidated financial statements of the Bank for the reporting period consisting of one, three, six or nine months of the present year, contained in the audit reports prepared in respect of these statements, as well as the interim financial statements and consolidated financial statements prepared in accordance with the International Financial Reporting Standards (IFRS)<sup>2</sup>;

1.1.50. Constituting the conditions for the placement of issue-grade securities, determined by a decision approved by the authorized body of the Bank on the issue (additional issue) of securities, approved bond program, approved conditions of issue (additional issue) of bonds within the framework of the bond program, if conditions provided for by clause 1.2 of this List are observed, with the exception of information that was previously disclosed in accordance with the requirements of the legislation of the Russian Federation on the securities market;

1.1.51. Contained in the report (notice) on the results of the issuance of equity securities issued by the authorized body of the Bank, if conditions provided for by clause 1.2 of this List are observed, with the exception of information that has already been disclosed in accordance with the requirements of the legislation of the Russian Federation on the securities market;

1.1.52. Contained in the securities prospectus approved by the authorized body of the Bank, excluding information that has been previously disclosed in accordance with the requirements of the laws of the Russian Federation on securities market.

1.1.53. Contained in the quarterly reports signed by the authorized bodies of the Bank, excluding information that has been previously disclosed in accordance with the requirements of the laws of the Russian Federation on securities market.

1.1.54. Contained in the annual reports of the Bank, signed by the authorized bodies of the Bank, excluding information that has been previously disclosed in accordance with the requirements of the laws of the Russian Federation on securities market.

1.1.55. On conclusion by the Bank of an agreement on strategic partnership or other agreement that is not provided for by subclauses 1.1.20, 1.1.21., 2.1.23, 1.1.30, 1.1.32, 1.1.37 of this List, if conclusion of such agreements may materially affect the price of issue-grade securities of the Bank.

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<sup>2</sup> The IFRS have been enacted in the Russian Federation as established by the Resolution of the Government of the Russian Federation No. 107 dated February 25, 2011 "On Approval of Regulation to Adopt the International Financial Reporting Standards and Their Clarifications for Application in the Russian Federation" (Collected Legislation of the Russian Federation, 2011, No. 10, art. 1385; 2012, No. 6, art. 680; 2013, No. 5, art. 407; No. 36, art. 4578), constituting such financial statements of the Bank, and if those have been audited, contained in the respective audit reports."

1.1.56. On the holding and agenda (on the refusal to hold) of the general meeting of bond holders of the Bank, as well as on decisions taken by the general meeting of bond holders of the Bank, if conditions provided for by clause 1.2 or clause 1.3 of this List are observed.

1.1.57. On sending (filing) by the Bank of the notice of the information on a representative of bond holders, if conditions provided for by clause 1.2 or clause 1.3 of this List are observed;

1.1.58. On the enactment by any court, arbitration court or executive authority that carries out enforcement proceedings, of injunctive measures in respect of funds or other property owned by the Bank, its controlling organization, an organization controlled by the Bank which is of significant importance to it, or by a person providing the security for the Bank's bonds, if in respect of such person and (or) bonds secured, the conditions are observed as foreseen by clause 1.4 of this List, amounting to 10 or more percent of the book value of the assets of the said persons as of the end of the last completed reporting period preceding the adoption of the injunctive measures.

1.1.59. On initiating the criminal case (as received by the Bank from any preliminary investigation or inquiry agencies) against any member of the Supervisory Board of the Bank, sole executive body of the Bank, its controlling organization, the organization controlled by the Bank, which is of significant importance to it, or against the person providing the security for the Bank's bonds, if in respect of such person and (or) bonds secured, the conditions are observed as foreseen by clause 1.4 of this List.

1.2. Information on issue-grade securities placed by the Bank, as provided for by subclauses 1.1.13 - 1.1.16, 1.1.50, 1.1.51, 1.1.56 and 1.1.57 of clause 1.1 of this List shall constitute insider information of the Bank, if:

- issue-grade securities of the Bank are placed in organized trading;
- issue-grade securities of the Bank being placed constitute an additional issue in relation to issue-grade securities of the issue, which are admitted to organized trading or in respect of which an application has been filed for admission to organized trading.

1.3. Information on placed (outstanding) issue-grade securities of the Bank, as specified in subclauses 1.1.12, 1.1.18, 1.1.19, 1.1.23, 1.1.37, 1.1.41, 1.1.56 and 1.1.57 of clause 1.1 of this List, shall be considered insider information of the Bank in case these issue-grade securities are admitted to organized trading or an application has been filed for their admission to organized trading.

1.4. Information on a person providing security for the Bank's bonds, as well as on the terms of such security, as provided for by subclauses 1.1.7 - 1.1.11, 1.1.30, 1.1.33, 1.1.34, 1.1.36, 1.1.44, 1.1.58, 1.1.59 of clause 1.1 of this List, shall belong to the Bank's insider information in case these bonds are admitted to organized trading or an application has been filed for their admission to organized trading.

Information on the person providing the security for the Bank's bonds, as provided for by subclauses 1.1.7 - 1.1.11, 1.1.30, 1.1.34, 1.1.59 of clause 1.1 of this List, shall not belong to the Bank's insider information in case such entity is the Russian Federation that has provided a state guarantee of the Russian Federation, a constituent entity of the Russian Federation that has provided a state guarantee of a constituent entity of the Russian Federation, or a municipal entity that has provided a municipal guarantee on the Bank's bonds.

1.5. The insider information of the Bank does not include information and (or) knowledge based on it, which are transferred by the Bank and/or by a person (s) engaged by it to potential purchasers or used by the Bank and (or) a person (persons) engaged by it to give recommendations or motivate prospective purchasers in other ways to purchase relevant securities in connection with a placement (placement arrangements) and (or) in connection with an offer (offer arrangements) in the Russian Federation or outside of it of issue-grade securities of the Bank, including through the placement of securities of a foreign Bank certifying rights in respect of the issue-grade securities of the Bank, subject to notification



of potential purchasers that such information (details) can be used by them solely for the purposes of the decision-making on the acquisition of placed (proposed) securities.

## **2. Insider information of the Bank as a professional securities market participant<sup>3</sup>**

2.1. The insider information of the Bank as a professional securities market participant that carries out transactions with financial instruments to the benefit of customers, shall include the following information received from customers:

2.1.1. Contained in customer orders for execution of transactions with securities in the cases when the execution of such orders may materially affect the prices of the relevant securities and the conditions provided for in clause 2.5 of this List are observed in respect of such securities.

2.1.2. Contained in the customers' orders to be fulfilled for concluding contracts that are:

- derivative financial instruments in case such orders may materially affect the prices of the relevant securities and, in respect of such securities, the conditions are observed as foreseen by clause 2.5 of this List;
- derivative financial instruments with a commodity as the underlying asset, in case such orders may materially affect the price of the relevant commodity and the conditions provided for in clause 2.6 of this List are observed in respect of such commodity.

2.1.3. Containing essential terms of trust management contracts related to transactions with securities and (or) the conclusion of contracts that are derivative financial instruments in the event that the exercise of trust management in accordance with these conditions can have a significant impact on the prices of the relevant securities and the conditions provided for in clause 2.5 of this List are observed with respect to such securities.

2.1.4. On decisions of employees of the trust manager on making security transactions and(or) concluding contracts that are derivative financial instruments, in case such transactions may materially affect the prices of the relevant securities and the conditions provided for in clause 2.5 of this List are observed with respect to such securities.

2.2. Insider information of the Bank, if conditions provided for by clause 2.6 of this List are observed in respect of a certain commodity, includes the following information received from customers:

- contained in the customers' orders to be fulfilled for making commodity transactions in case such orders may materially affect the price of the relevant commodity;
- contained in the customers' orders to be fulfilled for concluding contracts that are derivative financial instruments with a commodity as the underlying asset, in case such orders may materially affect the price of the relevant commodity.

2.3. Insider information of the Bank, if conditions provided for by clause 2.7 of this List are observed in respect of a certain foreign currency, includes the following information received from customers:

- contained in the customers' orders to be fulfilled for purchasing (buying) or selling foreign currencies through trading organizers, in case such orders may materially affect the price of the foreign currency;
- contained in the customers' orders to be fulfilled for concluding contracts that are derivative financial instruments with a foreign currency as the underlying asset, in case such orders may materially affect the price of the foreign currency.

Insider information of the Bank, if conditions provided for by clause 2.7 of this List are observed in respect of a certain foreign currency, shall include information on Bank's

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<sup>3</sup> The list of which is established by a regulatory act of the Bank of Russia

operations with foreign currency related to performance of banking operations in the interests of customers, if performance of such operations entails the necessity for the Bank to perform the relevant organized trading operations and performance of such operations may have a significant impact on the price of foreign currency.

2.4. The insider information contained in the orders received from customers and subject to fulfillment as specified in clauses 2.1 – 2.3 of this List, is the information on the price and volume (quantity) of securities, foreign currencies, commodities, contracts that are derivative financial instruments, actions that should be taken in fulfillment of such orders (purchase (buying) or alienation (sale), conclusion of a contract (contracts) that is a derivative financial instrument).

2.5. Information concerning certain securities, as provided for by clauses 2.1 and 2.8 of this List, shall belong to the insider information of the Bank, which performs transactions with financial instruments in the interests of customers, in the case these securities are admitted to organized trading or an application has been filed for their admission to organized trading.

2.6. Information concerning a certain commodity, as provided for by the third paragraph of subclause 2.1.2 of clause 2.1 and clause 2.2 of this List, shall belong to the insider information of the Bank, which performs transactions with financial instruments in the interests of customers, in the case this commodity is admitted to organized trading or an application has been filed for its admission to organized trading.

2.7. Information concerning a certain foreign currency, as provided for by clause 2.3 of this List, shall belong to the insider information of the Bank, in the case this foreign currency is admitted to organized trading or an application has been filed for its admission to organized trading.

2.8. Insider information of the Bank as a depository shall include information received on transactions for customer custody accounts, in the case it may materially affect the prices of securities and conditions provided for by clause 2.5 of this List are observed.

### **3. Additional (own) list of insider information which takes into account the specifics of the Bank's activities<sup>4</sup>.**

3.1. Insider information of the Bank as a securities issuer includes:

3.1.1. information on the long-term strategy of the Bank, as well as on changes in the corresponding strategy of the Bank;

3.1.2. information on events (covenant violation events), upon occurrence of which and expiry of the grace period, the creditor is entitled to demand from the Bank, as the borrower, early repayment of the debt under the loan agreement and(or) other agreements in which the Bank acts as a borrower or a guarantor of obligations.

3.2. Insider information of the Bank as a credit organization includes:

not applicable

3.3. Insider information of the Bank as a professional securities market participant includes:

3.3.1. information contained in a compliance application from an employee of the Bank's business unit for a personal transaction, received by a compliance employee, if the execution of such application may have a material impact on the prices of the respective financial instruments.

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<sup>4</sup> To be changed in accordance with the procedure established at the Bank.