

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

### **1. Insider Information of Sberbank Acting as a Securities Issuer<sup>2</sup>**

The insider information of Sberbank (hereinafter, the Bank) acting as a securities issuer includes the following information:

1.1. on convening and holding the General Meeting of Shareholders of the Bank, declaring the General Meeting of Shareholders of the Bank void, as well as on resolutions adopted by the General Meeting of Shareholders of the Bank or by a person owning all voting shares of the Bank;

1.2. on holding a meeting of the Bank's Supervisory Board and on its agenda, as well as on certain resolutions adopted by the Bank's Supervisory Board:

- on proposal to the General Meeting of Shareholders of the Bank, which is a joint-stock company, to establish a specific date in the resolution on dividend payment (declaration), as of which persons entitled to dividends are determined;
- on offering or sale of the Bank's securities;
- on determining or the procedure for determining the offer price of shares or securities convertible into the Bank's shares;
- on establishing of the Bank's executive body and on early termination (suspension) of its powers, including the powers of a managing organization or a manager;
- on including the nominees in the list of nominees to be voted for at the General Meeting of Shareholders of the Bank on the issue of the election of the Bank's Supervisory Board members;
- on recommendations on the amount of dividends on the Bank's shares and the procedure for their payment;
- on approval of the Bank's internal documents;
- on the consent to or subsequent approval of a transaction (several interrelated transactions) of the Bank recognized in accordance with the legislation of the Russian Federation as a major transaction and/or a related-party transaction, as well as another transaction (several interrelated transactions) the amount of which is equal to 10 or more percent of the value of assets according to the consolidated financial statements (financial statements) of the Bank;
- on the transfer of powers of the Bank's sole executive body to a managing company or a manager, on the approval of the managing organization company or the manager and the terms of the agreement entered into by the Bank and the managing organization or manager;
- on approval of the registrar maintaining the register of security holders of the Bank, the terms of the agreement with it in terms of maintaining the register of holders of the Bank's securities, as well as on termination of the agreement with it;

1.3. on making a decision on reorganization or liquidation of a person providing security for the Bank's bonds;

1.4. of the occurrence of signs of bankruptcy of the Bank or a person providing security for the Bank's bonds in accordance with the Federal Law dated October 26, 2002 No. 127-FZ On Insolvency (Bankruptcy);

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<sup>1</sup> Subject to changes in accordance with Order dated 02/02/2024 No. 40-O

<sup>2</sup> The list of which shall be approved by a regulatory act of the Bank of Russia.

- 1.5. on acceptance by the arbitration court of an application for recognition of the Bank as insolvent (bankrupt), as well as on the adoption by the arbitration court of a decision to recognize the Bank as insolvent (bankrupt), the introduction of one of bankruptcy procedures against the Bank, termination of bankruptcy proceedings against the Bank;
- 1.6. on the date as of which persons entitled to exercise rights under the Bank's securities are determined (fixed);
- 1.7. on the stages of the procedure for issuing securities of the Bank;
- 1.8. on suspension and resumption of the issue of the Bank's securities;
- 1.9. on recognizing the bond program as void, on recognizing the issue (additional issue) of the Bank's securities as void or invalid;
- 1.10. on redemption of the Bank's securities;
- 1.11. on registration of amendments to the resolution on the issue of securities in terms of changing the volume of rights to securities and/or the nominal value of securities, including in case of their consolidation or division;
- 1.12. on making a decision on acquisition (occurrence of grounds for acquisition) of securities offered by the Bank;
- 1.13. on accrued (declared) and/or paid income on the Bank's securities, on other payments due to the holders of the Bank's securities, as well as on the intention to perform the obligation to make payments on the Bank's bonds, the rights to which are recorded in the register of owners of the Bank's securities;
- 1.14. on inclusion of the Bank's securities by a Russian market operator in the list of listed securities for concluding purchase agreements, including on inclusion of the Bank's securities by a Russian stock exchange into a quotation list, or on exclusion of the Bank's securities by a Russian market operator from the listed securities for concluding purchase agreements, including on exclusion of the Bank's securities by a Russian stock exchange from a quotation list, as well as on the transfer of the Bank's securities from one quotation list to another quotation list (on excluding the Bank's securities from one quotation list and on including them into another quotation list);
- 1.15. on inclusion of the Bank's securities (securities of a foreign organization that certify the rights in respect of the securities of Russian issuers (hereinafter, depository securities) to the list of securities admitted to trading on a foreign organized (regulated) financial market, including on inclusion of the said securities by a foreign stock exchange in the quotation list and on exclusion of the Bank's securities (depository securities) from the list of securities admitted to trading on an organized (regulated) foreign financial market, including on excluding these securities from the quotation list by a foreign stock exchange;
- 1.16. on non-performance by the Bank of its obligations to the holders of its securities, as well as on changes in the total number of the bonds, the early redemption obligations for which have not been fulfilled;
- 1.17. on acquisition by or termination for the person of the right to, directly or indirectly (through persons controlled by it), independently or jointly with other persons who concluded with him/her a property trust management agreement, and (or) a partnership agreement, and (or) an agency agreement, and (or) a shareholder agreement, and (or) other agreement dealing with the exercise of rights certified by the Bank's shares, dispose of a certain number of votes attached to the voting shares that comprise the charter capital of the Bank, if the specified number of votes is 5 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 attached to the voting shares that comprise the charter capital of the Bank;
- 1.18. about the Bank's receipt, in accordance with Article XI.1 of the Federal Law No. 208-FZ On Joint-Stock Companies dated 26 December 1995 (Collected Acts of the Russian Federation, 1996, No. 1,

Article 1; 2006, No. 2, Article 172; 2016, No. 27, Article 4276) (hereinafter referred to as the Federal Law On Joint-Stock Companies), of a voluntary, including competing, or mandatory offer to purchase its securities, as well as on changes made to these offers;

1.19. about the notification, received by the Bank in accordance with Article XI.1 of the Federal Law On Joint-Stock Companies, on the right to demand the redemption of the Bank's securities or the demand for redemption of the Bank's securities;

1.20. on identification of errors in the reports of the Bank (accounting (financial) statements, consolidated financial statements, financial statements) disclosed earlier;

1.21. about the making by the Bank or an organization controlled by the Bank which is material to it as defined by Cl. 1.14 of the Regulation of the Bank of Russia No. 714-P (hereinafter, the Organization Controlled by the Bank and Material to It), of a transaction for the amount equal to 10 or more percent of the assets value according to consolidated financial statements of the Bank as of the last reporting date (the end date of the last completed reporting period preceding the date of the transaction);

1.22. on making by the Bank or the Organization Controlled by the Bank and Material to It of a related-party transaction with the attributes specified in Cl. 35.1 of the Regulation of the Bank of Russia No. 714-P;

1.23. on changes in the composition and (or) the value of the collateral for the Bank's collateralised bonds, and in case of changes in the composition and (or) the value of the collateral for the Bank's mortgage-backed bonds - the information about these changes if they are caused by the replacement of any collateralised claim making up the bonds mortgage collateral, or by replacement of other property constituting the mortgage collateral with the value (monetary value) of 10 or more percent of the amount of the bonds mortgage collateral;

1.24. on receipt by or termination for the Bank of the right to, directly or indirectly (through persons controlled by it), independently or jointly with other persons who concluded with the Bank a property trust management agreement, and (or) a partnership agreement, and (or) an agency agreement, and (or) a shareholder agreement, and (or) other agreement dealing with the exercise of rights certified by the shares of the company whose securities are listed, dispose of a certain number of votes attached to the voting shares that comprise its charter capital, if the specified number of votes is 5 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 attached to the voting shares (stakes) that comprise the charter capital of that company;

1.25. on conclusion by a person controlling the Bank or a company controlled by the Bank of a contract providing for the obligation to purchase the Bank's securities;

1.26. on the incurrence and (or) termination of the right of holders of the Bank's bonds to demand early redemption of the Bank's bonds owned by them;

1.27. on assigning a rating to the Bank's securities and (or) the Bank, as well as on changing the rating by a credit rating agency or other organization under the agreement concluded with the Bank;

1.28. on the initiation of court proceedings on a dispute related to the foundation of the Bank, its management or participation in it (hereinafter referred to as a corporate dispute), or other dispute where the Bank is a plaintiff or a respondent and the amount of claims is equal to 10 or more percent of the book value of assets according to the accounting (financial) statements of the Bank as of the last reporting date (the end date of the last completed reporting period preceding the date of the acceptance by the court of the statement of claim for hearing) (hereinafter referred to as the Material Dispute), as well as the adoption of a court ruling that terminates the consideration of the case on the merits in a corporate or Material Dispute, with the exception of the information specified in Cl. 41.6 of the Regulation of the Bank of Russia No. 714-P;

- 1.29. on offering outside the Russian Federation of bonds or other financial instruments certifying loan obligations to be discharged by the Bank;
- 1.30. on the decision of the Bank of Russia to exempt the Bank from the obligation to disclose information in accordance with Art. 30 of the Federal Law On Securities Market;
- 1.31. on acquisition (alienation) of voting shares of the Bank or depositary securities certifying rights in respect of the voting shares of the Bank, by the Bank or an organization controlled by the Bank, except when acquiring voting shares of the Bank (depositary securities certifying rights in respect of the voting shares of the Bank) by a broker and (or) a trustee acting in their own name but at the expense of the customer in execution of the customer's order in the process of offering the Bank's voting shares or acquisition (alienation) of the Bank's voting shares (depositary securities certifying rights in respect of the voting shares of the Bank);
- 1.32. on holding the general meeting of holders of the Bank's bonds and its agenda, on resolutions adopted by the general meeting of holders of the Bank's bonds, as well as on declaring the general meeting of holders of the Bank's bonds void;
- 1.33. on assignment by the Bank of a representative of the holders of the Bank's bonds after registration of the bond issue;
- 1.34. on the date starting from which a representative of bond holders exercises his/her powers;
- 1.35. on conclusion by the Bank of a novation agreement or provision of a settlement and release resulting in termination of the Bank's bonded obligations;
- 1.36. on arising of the right of holders of the Bank's convertible securities to demand from the Bank the conversion of the Bank's convertible securities owned by them;
- 1.36.(1) on the project(s) selected by the Bank for financing and/or refinancing of which it uses (will use) the funds received from the bond offering, the issue (program) of which is additionally identified using the words "green bonds", "social bonds", "sustainable development bonds", "adaptation bonds" (hereinafter respectively - Green Bonds, Social Bonds, Sustainable Development Bonds, Adaptation Bonds), if such project(s) is/are not specified in the resolution on issuing Green Bonds, Social Bonds, Sustainable Development Bonds, Adaptation Bonds;
- 1.36.(2) on conducting and results of an independent external assessment of the compliance of an issue (program) of Green Bonds, Social Bonds, Sustainable Development Bonds, the bonds the issue (program) of which is additionally identified with the words "bonds related to sustainable development goals" (hereinafter, the Bonds Related to Sustainable Development Goals), Adaptation Bonds, or the Bank's policy on using the funds received from the offering of these bonds, or the project (projects) for financing (refinancing) of which the funds received from the offering of the said bonds will be used, the principles and standards of financial instruments specified in the resolution on the issue of such bonds;
- 1.36.(3) on conducting and results of an independent external assessment of changes made to the Bank's policy on the use of funds received from the offering of Green Bonds, Social Bonds, Sustainable Development Bonds, Adaptation Bonds;
- 1.36.(4) on conducting and results of an independent external assessment of changes introduced into the climate transition strategy (if such changes deal with the target performance indicators of the Bank and their interim and final values, the internationally recognized scenario of climate change that is the basis for developing the Bank's climate transition strategy, as well as affect the attainment of interim and final values of target indicators of the Bank's activities through implementation of the Bank's climate transition strategy) of the Bank acting as the issuer of bonds the issue (program) of which is additionally identified using the words "climate transition bonds" (hereinafter referred to as Climate Transition Bonds);

1.36.(5) on the misuse of funds received from the offering of Green Bonds, bonds the issue (program) of which is additionally identified using the words “infrastructure bonds”, Social Bonds, Sustainable Development Bonds, Adaptation Bonds, and on the consequences of the misuse of these funds envisaged by the resolution on the bond issue;

1.36.(6) on violation of the principles and standards of financial instruments specified in the resolution on the bonds issue when implementing a project (projects) for financing and/or refinancing of which the Bank uses funds received from the offering of Green Bonds, Social Bonds, Sustainable Development Bonds, Adaptation Bonds;

1.36.(7) on the inclusion of Green Bonds, Social Bonds, Sustainable Development Bonds, Adaptation Bonds into the list of financial instruments for sustainable development published on the special page of the methodological center of the State Development Corporation VEB.RF in the Internet, or into the list of financial instruments for sustainable development maintained by the International Capital Markets Association (ICMA) or the International Non-Profit Organization Climate Bonds Initiative (CBI), and to exclude such bonds from the said list;

1.36.(8) on the achievement or failure to achieve interim (if any) or final target values of the key performance indicator(s) of the Bank's bonds specified in the resolution on the issue of bonds related to the sustainable development goals;

1.36.(9) on achievement or failure to achieve interim or final values of the target performance indicators of the Bank's climate transition bonds specified in the Bank's Change of Business Strategy for the Transition to a Low-Carbon (Energy Transition) Economy, Prevention of Climate Change and Achievement of Other Goals Established by the Paris Agreement dated December 12, 2015, adopted by the Decree of the Government of the Russian Federation dated 21 September 2019 No. 1228 On Adoption of the Paris Agreement (entered into force for the Russian Federation on 6 November 2019)

1.37. on adoption by the Bank's authorized body of a resolution on full (partial) termination of obligations to pay the principal, unpaid interest and financial sanctions for non-performance of obligations under subordinated bonded loans;

1.38. on adoption of a resolution by the Bank's authorized body on unilateral refusal to pay interest (coupon) on subordinated bonded loans;

1.39. the information comprising the annual consolidated financial statements (financial statements) of the Bank, the interim consolidated financial statements (financial statements) of the Bank for the reporting period consisting of 6 months of the reporting year, as well as the information contained in the audit reports prepared in respect of these statements, or another document compiled based on the results of the audit of the interim consolidated financial statements (financial statements) in accordance with auditing standards;

1.40. the information contained in the Bank's annual reports, except for the information that was disclosed earlier;

1.41. the information comprising the Bank's interim accounting (financial) statements for the reporting period consisting of 3, 6 or 9 months of the reporting year, together with information contained in the audit reports prepared in respect of these statements, if these statements were audited, as well as the information comprising the Bank's annual accounting (financial) statements, together with the audit report thereon, if these statements were audited;

1.42. the information contained in the reports of the Bank acting as an issuer of issue-grade securities prepared for the reporting periods consisting of 6 and 12 months, except for information that was disclosed earlier;

1.43. the information contained in the prospectus of the Bank's securities, with the exception of information that was disclosed earlier;

1.44. the information about the conditions for securities offering executed by the Bank as a separate document, with the exception of information that was disclosed earlier (if there is no securities prospectus or if the securities prospectus does not contain information about the conditions of the offering);

1.45. on the conclusion by the Bank of a strategic partnership agreement or another agreement (transaction), with the exception of agreements (transactions) provided for by lines 1.21, 1.22 and 1.27 of this List, if the conclusion of such a contract (transaction) may materially affect the price of the Bank's listed securities (or securities in respect of which a listing application is filed);

1.46. on the adoption by the court, arbitration court, Federal Bailiff Service of interim measures (including seizure) in respect of funds or other property owned by the Bank, its controlling organization, the Organization Controlled by the Bank and Material to It, or to a person that provided security for the Bank's listed bonds (or in respect of which a listing application is filed) that is not the Russian Federation, that has provided the state guarantee, the 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 representing 10 or more percent of the book value of assets of these entities as of the end date of the last completed reporting period preceding the adoption of interim measures;

1.47. on acquisition by or termination for the person of the right, directly or indirectly (through persons controlled by him/her), independently or jointly with other persons related to him/her by a property trust management agreement and (or) a partnership agreement, and (or) an agency agreement, and (or) a shareholder agreement, and (or) other agreement dealing with the exercise of rights certified by shares of the company that provided a suretyship, a guarantee or a pledge on the Bank's listed bonds (or bonds in respect of which a listing application is filed), if the person providing such a suretyship, guarantee or pledge for such bonds is not the Russian Federation that provided the state guarantee of the Russian Federation, the subject of the Russian Federation that provided the state guarantee of the subject of the Russian Federation, or a municipal entity that provided the municipal guarantee, to dispose of a certain number of votes attached to the voting shares that comprise its authorized capital, if the specified number of votes is equal to 5 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 attached to the voting shares comprising the authorized capital of the said company;

1.48. on the circumstances provided for by the second paragraph of Subclause 23, Cl. 1, Art. 2 of the Federal Law On the Securities Market, depending on which the payments against the Bank's listed structured bonds (or bonds in respect of which a listing application is filed) (including payments upon redemption of structured bonds) are made or not made (hereinafter, the Circumstances), indicating numerical values (parameters, conditions) of the Circumstances or the procedure for their determination, as well as the amount of payments under the structured bond (including the amount of payments upon redemption of the structured bond) or the procedure for its determination, with the exception of information that was disclosed earlier;

1.49. on numerical values (parameters, conditions) of the Circumstances or the procedure for their determination, as well as on the amount of payments under a structured bond (including the amount of payments upon redemption of a structured bond) or the procedure for determining it, if they are established by the authorized body of the Bank before the start of offering of structured bonds in accordance with Subclauses 1 and 2 Para. 3 Art. 27.1-1 of the Federal Law On the Securities Market, except for information that was disclosed earlier (in case such information is not contained in the resolution on the issue of structured bonds);

1.50. on initiation of a criminal case (the information received by the Bank from preliminary investigation agencies or investigative authorities) against a person who is a member of the management bodies of the Bank, an organization controlling the Bank, an Organization Controlled by the Bank and

Material to It, or a person who provided security for the Bank's listed bonds (or bonds in respect of which a listing application is filed);

1.51. the information contained in the reporting forms specified in the lines 17, 18, 22, 23, 25 - 27, 30 - 32, 34 - 40, 45, 47, 49, 51, 54, 63, 66, 68 - 71, 73, 89, 127 Appendices 2 to the Instruction of the Bank of Russia from On April 10, 2023 No. 6406-U "On the forms, deadlines, procedure for compiling and submitting reports of credit institutions (banking groups) to the Central Bank of the Russian Federation, as well as on the list of information on the activities of credit institutions (banking groups)" (registered by the Ministry of Justice of the Russian Federation on August 16, 2023, registration No. 74823);

1.52. the information contained in Appendices 1 - 5 to the Directive of the Bank of Russia dated 9 February 2009 No. 2181-U On the Procedure for Submitting by Credit Institutions of the Information and Documents to the Authorized Representatives of the Bank of Russia registered with the Ministry of Justice of the Russian Federation on 18 February 2009 under No. 13380, on 18 May 2012 under No. 24213, on 18 December 2013 under No. 30628 (hereinafter, the Directive of the Bank of Russia No. 2181-U), as well as the information contained in the reporting statements submitted to the authorized representatives of the Bank of Russia according to the Directive of the Bank of Russia No. 2181-U;

1.53. the information contained in Appendices 1-3 to the Bank of Russia Directive No. 3777-U dated 9 September 2015 On Preparation and Submission to the Bank of Russia of Reporting and Other Information on Risks of a Banking Holding Company, registered with the Ministry of Justice of the Russian Federation on 9 November 2015 under No. 39615, on 13 June 2018 under No. 51340;

1.54. the information on accepted risks, risk assessment procedures, risk and capital management procedures prepared in accordance with Bank of Russia Directive No. 4482-U dated 7 August 2017 On the Form and Procedure for Disclosure by a Credit Institution (Parent Credit Institution of a Banking Group) of Information on Accepted Risks, Risk Assessment Procedures, Risk and Capital Management Procedures, as registered with the Ministry of Justice of the Russian Federation on 1 November 2017 under No. 48769, on 29 June 2018 under No. 51480, on 21 February 2019 under No. 53860, on 10 July 2020 under No. 58908;

1.55. the information contained in the materials, based on which the Bank's management bodies, except for the General Meeting of Shareholders, make decisions that may materially affect the price of the Bank's listed securities (or securities in respect of which a listing application is filed), except for information that was disclosed earlier;

1.55(1) about an accident occurred in hazardous production facilities operated by the Bank as defined by the Federal Law dated 21 July 1997 No. 116-FZ On Industrial Safety of Hazardous Production Facilities, if such information may have a significant impact on the price of the Bank's listed securities (or securities in respect of which a listing application is filed) ;<sup>3</sup>

1.56. the information on other events (actions) that, in the opinion of the Bank, have a material impact on the price or quotations of its securities.

## **2. Insider information of the Bank acting as a professional securities market participant<sup>1</sup>**

The Insider information of the Bank acting as a professional securities market participant, that has received insider information from customers, includes the following information:

2.1. the information contained in customers' orders for making transactions with securities;

2.2. the information contained in customers' orders for conclusion of contracts that are derivative financial instruments;

2.3. the information contained in customers' orders for commodity transactions;

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<sup>3</sup> Comes into force on 01/04/2024.

- 2.4. the information contained in customers' orders to buy (purchase) or sell foreign currency through market operators;
- 2.5. the information on the Bank's foreign currency transactions related to carrying out banking transactions for the benefit of customers, if carrying out such transactions entails the need for the Bank to carry out organized trading transactions and can have a significant impact on the price of foreign currency;
- 2.6. the information on transactions on clients' custody accounts;
- 2.7. the information contained in the messages submitted by customers about the intention to conclude an agreement through on-exchange trading, containing the terms of such an agreement<sup>4</sup>.

### **3. The list of insider information related to the specifics of the Bank's activities<sup>5</sup>**

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

3.1.1. the information on the long-term development strategy of the Bank, including about changes in the respective long-term development strategy of the Bank;

3.1.2. the information on events (covenant violation events), the occurrence of which, after the expiration of the grace period, gives the lender the right to demand from the Bank as a borrower of the early performance of obligations under the loan agreement and/or other agreements where the Bank acts as a borrower or a guarantor of obligations;

3.1.3. information comprising interim consolidated financial statements (financial statements) of the Bank for the reporting period consisting of 3 and 9 months of the reporting year, as well as the information contained in the audit reports prepared in respect of these statements, or another document compiled based on the results of the audit of interim consolidated financial statements (financial statements) in accordance with auditing standards.

3.2. The Insider information of the Bank acting as a professional securities market participant shall include information contained in an application from a Bank's employee for making a personal transaction, received by an employee of the compliance unit, if the execution of such application may materially affect the prices of the respective financial instruments.

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<sup>4</sup> Comes into force on 01/04/2024.

<sup>5</sup> To be amended in accordance with the procedure approved in the Bank.