

## **INSIDER INFORMATION LIST**

### **1. Insider information of ACRA as an insider in accordance with Paragraph 12 of Article 4 of Federal Law No. 224-FZ on Insider Information**

1.1. Information about assignment, change and suspension of a rating or any other Rating Action regarding:

- 1) Issuers and asset management companies;
- 2) Economic entities included in the register provided for by Article 23 of the Federal Law No. 135-FZ of July 26, 2006, "On the Protection of Competition" and occupying a dominant position on the market of certain goods within geographical borders of the Russian Federation;
- 3) Trade organizers, clearing organizations, depositories and credit institutions that make settlements upon the results of transactions made through trade organizers;
- 4) Professional participants of the securities market and other persons/entities transacting on behalf of their customers with financial instruments, foreign currency and/or goods that have obtained insider information from clients;
- 5) Securities, admitted to the organized market, or an application has been filed for their admission to the organized market.

1.2. Information, which is part of Insider Information of persons/entities indicated in Clause 1.1 of this List and obtained by ACRA in connection with rating assignment or another other rating action mentioned in Clause 1.1. of this List.

### **2. Insider information of ACRA as an issuer, as well as issuers' insider information that ACRA obtained in connection with rating assignment or another rating action**

2.1. Information about convening and holding a general meeting of participants (shareholders) of the issuer, including its agenda, date, record date, and decisions taken by this meeting.

2.2. Information about the agenda of a board of directors (supervisory board) meeting of the issuer and the decisions taken.

2.3. Information about the instances of failure of the board of directors (the supervisory board) of the issuer to take the following decisions that must be taken in accordance with the federal laws:

- 1) On convening the annual (ordinary) general meeting of shareholders (participants) of the issuer, being a business entity, as well as on other decisions related to preparing, convening and holding the annual (ordinary) general meeting of shareholders (participants) of such issuer;
- 2) On convening (holding) or refusal to convene (hold) an extraordinary general meeting of shareholders (participants) of the issuer, being a business entity, upon request by the audit committee (an auditor) of such issuer, by the auditor of the issuer or by its shareholders (a shareholder) owning at least 10 percent of the voting shares (participants with a cumulative holding of at least one-tenth of the total number of participants' votes) of such issuer;
- 3) On inclusion of or a refusal to include certain issues on the agenda of the general meeting of shareholders (participants) of the issuer, being a business entity, and on inclusion of or a refusal to include the nominated candidates onto the list of candidatures for election to a relevant body of such issuer, provided that such candidates were proposed by shareholders (a shareholder) that own (owns) at least two

percent of the voting shares of such issuer, or by any shareholder if the issuer is a limited liability company;

- 4) On formation of a sole executive body of the issuer, being a joint-stock company, on two consecutive meetings of the board of directors (the supervisory board) of the issuer or within two months after the date of termination or expiration of powers of the previous sole executive body of the issuer in the case stipulated by Paragraph 6 of Article 69 of the Federal Law of 26 December 1995 N 208-FZ “On Joint-Stock Companies” (hereinafter – the Federal Law “On Joint-Stock Companies”);
- 5) On early termination of powers of the sole executive body of the issuer, being a joint-stock company, on two consecutive meetings of the board of directors (the supervisory board) of the issuer in the case stipulated by Paragraph 7 of Article 69 of the Federal Law “On Joint-Stock Companies”;
- 6) On convening (holding) an extraordinary general meeting of shareholders of the issuer, being a joint-stock company, in the case when the members count on the board of directors (the supervisory board) of the issuer becomes lower than that needed for a quorum for holding meetings of the board of directors (the supervisory board) of the issuer;
- 7) On formation of a temporary sole executive body of the issuer, being a joint-stock company, and on holding an extraordinary general meeting of shareholders of such issuer to solve the problem on early powers termination of its sole executive body or managing organization (the manager), and on formation of a new sole executive body of such issuer or on transfer of powers of its sole executive body to the managing organization (the manager) when the board of directors (the supervisory board) of the issuer takes decision to suspend the powers of its sole executive body or powers of the managing organization (the manager);
- 8) On recommendations received by the issuer, being a joint-stock company, regarding a voluntary, including competing, or mandatory offer, including evaluation of the offered price of purchased securities and possible changes of their market value after the acquisition, an estimate of plans of the person/entity that sent the voluntary, including competing, or mandatory offer in respect of such issuer, including its employees.

2.4. Information about filing by the issuer of an application for inclusion of entries into the unified state register of entities related to reorganization, termination of activities or liquidation of the issuer, and in case of the body performing state registration of legal entities refuses to make such records – information on taking such decision.

2.5. Information about an emergence of an organization, which is controlled by the issuer and is significantly important for it, as well as about termination of the grounds for control over such organization.

2.6. Information about appearance of a person/entity controlling the issuer, as well as about termination of the grounds for such control.

2.7. Information about a decision on reorganization or liquidation by the organization controlling the issuer, by the organization, which is controlled by the issuer and is significantly important for it, or by the person/entity that provided guarantees for the bonds of this issuer, if such person/entity and/or such bonds comply with conditions stipulated in Clause 2.60 of this List.

2.8. Information about filing by the organization controlling the issuer, or by the organization, which is controlled by the issuer and is significantly important for it, or by the person/entity that provided guarantees for the bonds of this issuer, if such person/entity and/or such bonds comply with conditions stipulated in Clause 2.60 of this List, of an application for inclusion of entries into

the unified state register of entities related to reorganization, termination of activities or liquidation of these organizations.

2.9. Information about the issuer, its controlling person/entity, the organization, which is controlled by the issuer and is significantly meaningful for it, or the person/entity that provided guarantees for the bonds of this issuer, if such person/entity and/or such bonds comply with conditions stipulated in Clause 2.60 of this List, showing signs of insolvency (bankruptcy) stipulated by the legislation of the Russian Federation on insolvency (bankruptcy).

2.10. Information about acceptance by the arbitration court of the application on recognizing the issuer, its controlling person/entity, the organization, which is controlled by the issuer and is significantly important for it, or the person/entity that provided guarantees for the bonds of this issuer, if such person/entity and/or such bonds comply with conditions stipulated in Clause 2.60 of this List, bankrupt, as well as on the adoption by the arbitration court of a decision recognizing the specified persons/entities bankrupt and on initiation of one of bankruptcy procedures against them, or on termination of bankruptcy proceedings against them.

2.11. Information about filing against the issuer, its controlling person/entity, the organization, with is controlled by the issuer and is significantly important for it, or the person/entity that provided guarantees for the bonds of this issuer, if such person/entity and/or such bonds comply with conditions stipulated in Clause 2.60 of this List, of a lawsuit with a claim size of 10 or more percent of the asset book value of these persons/entities as of end of the latest complete reporting period preceding the moment of lawsuit filing; or information about another claim, which, as the issuer believes, may materially affect the financial position of the issuer or such persons/entities, if it gets satisfied.

2.12. Information about the date on which the list of persons/entities entitled to exercise the rights relative to issuer's securities, including the record date which fixes the list of persons/entities authorized to participate in the general meeting of shareholders of the issuer, provided that conditions outlined in Clause 2.59 of this List are observed.

2.13. Information about adoption by issuer's authorized bodies of the following decisions, provided that the conditions outlined in Clause 2.58 of this List are observed:

- 1) On placement of securities of the issuer;
- 2) On approval of a decision to issue (or conduct an additional issue of) issuable securities of the issuer;
- 3) On the approval of a securities prospectus of the issuer;
- 4) On the starting date of placement of issuable securities of the issuer;
- 5) On changes to the decision to issue (or conduct an additional issue of) issuable securities and/or on amendments to the securities prospectus, as well as on change of covenants initially set by the decision about the placement of such issuable securities.

2.14. Information about the completion of issuer's securities placement, provided that the conditions outlined in Clause 2.58 of this List are observed.

2.15. Information about filing (submitting) by the issuer of an application for a state registration of an issue (an additional issue) of issuable securities, or for a state registration of securities prospectus, or for a state registration of amendments made to the decision on the issuance (additional issuance) of issuable securities and/or to their prospectus, or for a state registration of the report on the results of issuance (additional issuance) of securities, provided that the conditions outlined in Clause 2.58 of this List are observed.

2.16. Information about filing (submitting) by the issuer of a notice about results of issuance (additional issuance) of issuable securities, provided that the conditions outlined in Clause 2.58 of this List are observed.

- 2.17. Information about a decision of the arbitration court to recognize the issue (the additional issue) of issuable securities of the issuer void.
- 2.18. Information about redemption of issuer's securities, provided that the conditions outlined in Clause 2.59 of this List are observed.
- 2.19. Information about accrued and/or paid income on issuer's issuable securities, provided that the conditions outlined in Clause 2.59 of this List are observed.
- 2.20. Information about an agreement conclusion between the issuer and a Russian trade organizer about the inclusion of issuable securities of the issuer in the list of securities admitted to organized trading by the Russian trade organizer, as well as about signing a contract with a Russian stock exchange about the inclusion of issuable securities of the issuer on the quotation list of a Russian stock exchange.
- 2.21. Information about a conclusion by the issuer of an agreement on inclusion of its issuable securities, or securities of a foreign issuer that certify the rights in respect of issuable securities of the Russian issuer, in the list of securities admitted to trading on a foreign organized (regulated) financial market, as well as about signing a contract with a foreign stock exchange about inclusion of such securities on the quotation list of the foreign exchange.
- 2.22. Information about inclusion of issuable securities of the issuer, or securities of a foreign issuer that certify the rights in respect of issuable securities of the Russian issuer, in the list of securities admitted to trading on a foreign organized (regulated) financial market, and about exclusion of such securities from the specified list, as well as about inclusion of such securities on foreign exchange's quotation list or about their exclusion from such list.
- 2.23. Information about conclusion of an agreement by the issuer about support (stabilization) of prices for issuable securities of the issuer (securities of a foreign issuer certifying the rights in respect of issuable securities of the Russian issuer), about the terms of this agreement and its termination, provided that the conditions outlined in Clause 2.59 of this List are observed.
- 2.24. Information about filing by the issuer of an application for a Bank of Russia permit for placement and/or initiating circulation of issuer's securities outside the Russian Federation.
- 2.25. Information about issuer's failure to meet its obligations to holders of its securities.
- 2.26. Information about acquiring by a person/entity or depriving this person/entity of the right to directly or indirectly (through controlled persons/entities), independently or jointly with other persons/entities, bound to him/it by an agreement on property trust management and/or conventional partnership, and/or commission and/or a shareholder agreement and/or other agreement, which envisages the exercising of rights certified by issuer's shares (stakes), to control a certain number of votes attached to voting shares (stakes), which constitute the charter capital of the issuer, if the specified number of votes makes up five percent or has become higher or lower than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attributable to voting shares (stakes), which constitute the charter capital of the issuer.
- 2.27. Information about any voluntary, including competing, or obligatory offer to acquire its issuable securities received by the issuer in accordance with Chapter XI.1 of the Federal Law "On Joint-Stock Companies", as well as about changes made to such offer.
- 2.28. Information about any notice of the right to demand buyout of issuable securities or an actual demand to buyout the securities received by the issuer in accordance with Chapter XI.1 of the Federal Law "On Joint-Stock Companies".
- 2.29. Information about detection of errors in previously disclosed financial (accounting) statements of the issuer, if such errors may have a significant impact on the price of issuable securities of the issuer.

2.30. Information about the issuer or a person/entity that provided security for issuer's bonds, if the person/entity that provided such security, and/or bonds secured by it comply with conditions outlined in Clause 2.60 of this List, making a transaction, which amounts to 10 or more percent of book value the issuer or the mentioned person/entity as of end of the latest complete reporting period preceding the transaction.

2.31. Information about an organization which controls the issuer, or an organization, which is controlled by the issuer and is significantly important for it, making a transaction, which is categorized by the legislation of the Russian Federation a large transaction.

2.32. Information about the issuer making a transaction, which is an object of interest and requires an approval by the authorized governance body of the issuer in accordance with the legislation of the Russian Federation, if such transaction amounts to:

- 1) Over 500 million rubles, or two or more percent of book value of the issuer as of the date specified further in this sub-clause, with the latter applicable to issuers with book value as of end of the latest complete reporting period preceding the transaction approval by the authorized governance body of the issuer (or as of end of the latest complete reporting period preceding the execution by the issuer of such transaction, if the transaction was not approved by issuer's authorized governance body prior to its execution), not exceeding 100 billion rubles;
- 2) One percent or more of asset book value of the issuer as of the date specified further in this sub-clause, with the latter applicable to issuers with book value as of end of the latest complete reporting period preceding the transaction approval by the authorized governance body of the issuer (or as of end of the latest complete reporting period preceding the execution by the issuer of such transaction, if the transaction was not approved by issuer's authorized governance body prior to its execution), exceeding 100 billion rubles.

2.33. Information about a change in structure and/or size of issuer secured bonds' security, if such bonds comply with conditions outlined in Clause 2.60 of this List, and in case of changes to structure and/or size of issuer mortgage-backed bonds' security – the information on such changes, if they are caused by a replacement of any mortgage-backed claim comprising the mortgage collateral of the bonds, or if the mentioned changes are caused by a replacement of other property, which constitutes the mortgage collateral of the bonds and whose value (monetary valuation) amounts to 10 or more percent of the total size of the bonds' mortgage collateral.

2.34. Information about a change in asset value of the person/entity that provided security for issuer's bonds, if the provider of such security and/or bonds for which it is provided comply with conditions outlined in Clause 2.60 of this List, provided that the mentioned asset value change amounts to at least 10 per cent; as well as information about any other change in such person's/entity's financial and economic standing that the issuer considers significant.

2.35. Information about acquiring by a person/entity or depriving this person/entity of the right to directly or indirectly (through controlled persons/entities), independently or jointly with other persons/entities, bound to him/it by an agreement on property trust management and/or conventional partnership, and/or commission and/or a shareholder agreement and/or other agreement, which envisages the exercising of rights certified by shares (stakes) in an organization, whose issuable securities are admitted to organized trading, or whose asset value exceeds five billion rubles, to control a certain number of votes attached to voting shares (stakes), which constitute the charter capital of the mentioned organization, if the specified number of votes makes up five percent or has become higher or lower than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attributable to voting shares (stakes), which constitute the charter capital of such organization.

2.36. Information about acquiring by a person/entity or depriving this person/entity of the right to directly or indirectly (through controlled persons/entities), independently or jointly with other persons/entities, bound to him/it by an agreement on property trust management and/or conventional partnership, and/or commission and/or a shareholder agreement and/or other agreement, which envisages the exercising of rights certified by shares (stakes) in an organization, which provided security for issuer's bonds, if the provider of such security and/or bonds for which it is provided comply with conditions outlined in Clause 2.60 of this List, to control a certain number of votes attached to voting shares (stakes), which constitute the charter capital of the mentioned organization, if the specified number of votes makes up five percent or has become higher or lower than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attributable to voting shares (stakes), which constitute the charter capital of such organization.

2.37. Information about the issuer, or the person/entity with controls the issuer or is controlled by the issuer, concluding a contract providing for an obligation to purchase issuable securities of the specified issuer, provided that the conditions outlined in Clause 2.59 of this List are observed.

2.38. Information about obtaining, suspending, renewing, reissuing, withdrawing (cancelling) or terminating on other grounds of a permit (a license) entitling the issuer to certain activities of significant financial and economic importance for it.

2.39. Information about expiry of powers of the sole executive body and/or members of the collective executive body of the issuer.

2.40. Information about changes in stake sizes in the authorized (share) capital of the issuer and of the organizations, which are controlled by the issuer and are significantly important for it, with the mentioned change in stake sizes applicable to:

- 1) Members of the board of directors (the supervisory board) and members of the collective executive body of the issuer, as well as the person holding the position (performing functions) of the sole executive body of the issuer;
- 2) Members of the board of directors (the supervisory board) and members of the collective executive body of the managing organization, as well as the person holding the position (performing functions) of the sole executive body to the managing company, if the powers of the sole executive body of the issuer are transferred to the managing organization.

2.41. Information about an emergence and/or termination of the right for the holders of issuer's bonds to demand from the issuer an early redemption of the bonds they hold, provided that the conditions outlined in Clause 2.59 of this List are observed.

2.42. Information about hiring or replacing organizations rendering to the issuer intermediary services related to execution by the issuer of its liabilities pertaining to bonds or other issuable securities, with specifying names and locations of such organizations and remunerations paid for their services, as well as any changes to this information.

2.43. Information about any dispute related to issuer's inception, management or stake holding, if an outcome of this dispute may significantly impact the price of issuable securities of the issuer.

2.44. Information about the person/entity that provided security for issuer's bonds, if the provider of such security and/or bonds for which it is provided comply with conditions outlined in Clause 2.60 of this List, receiving any claims related to fulfillment of obligations regarding such bonds.

2.45. Information about placing outside the Russian Federation of bonds or other financial instruments certifying debt liabilities to be covered at the expense of the issuer.

2.46. Information about an acquisition (an alienation) of voting shares (stakes) of the issuer or securities of a foreign issuer certifying the rights pertaining to voting shares of the issuer, with such acquisition (alienation) performed by the issuer and/or by organizations controlled by it,

except for controlled organizations that are brokers and/or trust managers and have made the transaction on their own behalf but at the expense of a customer other than the issuer and/or its controlled organization.

2.47. Information that is sent or provided by issuer to a relevant authority (a relevant organization) of a foreign state, to a foreign stock exchange and/or other organizations in accordance with foreign law for the purpose of disclosure or provision of such information to foreign investors in relation to placement or circulation of issuable securities of the issuer outside the Russian Federation, including through acquisition of securities of a foreign issuer being placed (already placed) in accordance with foreign law, if such information could significantly influence the price of securities of the issuer.

2.48. Information that constitutes the annual financial statements and consolidated financial statements of the issuer, as well as information contained in audit reports prepared in respect of the mentioned accounts.

2.49. Information that constitutes the interim accounting (financial) statements and consolidated financial statements of the issuer for the period of three, six or nine months of a current year, as well as information contained in audit reports prepared in respect of the mentioned accounts.

2.50. Information that constitutes placement conditions for issuable securities, set by the securities issuance (additional issuance) decision by an authorized body of the issuer, provided that the conditions outlined in Clause 2.58 of this List are observed, with the exception of information that has previously been disclosed in accordance with the requirements of the legislation of the Russian Federation on the securities market.

2.51. Information contained in a report (notification) on the results of securities issuance approved by an authorized body of the issuer, provided that the conditions outlined in Clause 2.58 of this List are observed, with the exception of information that has previously been disclosed in accordance with the requirements of the legislation of the Russian Federation on the securities market.

2.52. Information contained in a securities prospectus approved by an authorized body of the issuer, except for information that has previously been disclosed in accordance with the requirements of the legislation of the Russian Federation on the securities market.

2.53. Information contained in quarterly reports signed by authorized persons of the issuer, except for information that has previously been disclosed in accordance with the requirements of the legislation of the Russian Federation on the securities market.

2.54. Information contained in an annual report signed by authorized persons of the issuer, being a joint-stock company, except for information that has previously been disclosed in accordance with the requirements of the legislation of the Russian Federation on the securities market.

2.55. Information about conclusion by the issuer of a contract on strategic partnership or another agreement, not provided for in paragraphs 2.20, 2.21, 2.23, 2.30, 2.32, 2.37 of this List, if the conclusion of such agreements may have a significant influence on the price of issuer's securities.

2.56. Information about convening (a refusal to convene) a general meeting of bondholders of the issuer, the agenda of this meeting and the decisions taken by it, provided that the conditions outlined in Clause 2.58 and Clause 2.59 of this List are observed.

2.57. Information about appointment by the issuer of a new representative of the bond holders, provided that the conditions outlined in Clause 2.58 and Clause 2.59 of this List are observed.

2.58. Information about issuable securities being placed the issuer and provided for in Clauses 2.13-2.16, 2.50, 2.51, 2.56 and 2.57 of this List, shall be regarded issuer's insider information if:

- 1) Issuer's securities are being placed on the organized market;

- 2) The issuer's securities being placed constitute an additional issue in relation to the securities that are admitted to organized trading, or an application for their admission to organized trading has been filed.

2.59. The information about issuable securities of the issuer either placed or in circulation, as provided for by Clauses 2.12, 2.18, 2.19, 2.23, 2.37, 2.41, 2.56 and 2.57 of this List, shall constitute insider information of the issuer, if these securities are admitted to organized trading, or an application for their admission to organized trading has been filed.

2.60. Information about the person/entity that has provided security for issuer's bonds, as well as the terms of this security, as provided for in Clauses 2.7-2.11, 2.30, 2.33, 2.34, 2.36 and 2.1.44 of this List, shall constitute insider information of the issuer, if these securities are admitted to organized trading, or an application for their admission to organized trading has been filed.

Information about the person/entity that has provided security for issuer's bonds, as provided for in Clauses 2.7-2.11, 2.30 and 2.34 of this List, shall not constitute insider information of the issuer, if such person/entity is the Russian Federation that has provided a state guarantee of the Russian Federation, or a subject of the Russian Federation that has provided a state guarantee of the subject of the Russian Federation, or a municipal authority that has provided a municipal guarantee to issuer's bonds.

2.61. Insider information of the issuer does not include the information and/or data based on it that are transferred by the issuer and/or by a person/entity (persons/entities) hired by it to potential buyers, or is used by the issuer and/or the person/entity (persons/entities) hired by it for advising or otherwise motivating potential buyers to acquire the relevant securities in connection with placement (organization of placement) and/or offer (organization of offer) in the Russian Federation or abroad of issuer's securities, including placement of securities of a foreign issuer certifying the rights in respect of issuable securities of the issuer, subject to notification of potential purchasers that this information (data) may be used by them solely for taking a decision on the acquisition of the securities being placed (offered).

2.62. If securities of a foreign issuer that were issued (are being issued) in accordance with issuer's personal law (hereinafter – securities of a foreign issuer) and were admitted (are being admitted) to public placement and/or public circulation in the Russian Federation, or other securities of a foreign issuer (depository securities certifying the rights in respect of securities or other securities of a foreign issuer that were admitted (are being admitted) to public placement and/or public circulation in the Russian Federation) have been listed on a foreign stock exchange included on the approved list of foreign stock exchanges, listing on which is a mandatory prerequisite for the Russian stock exchange to take a decision to admit securities of foreign issuers to organized trading without Bank of Russia's decision on their admission to public placement and/or public circulation in the Russian Federation; insider information of such foreign issuer shall include information, which is considered as insider information by the personal law of a foreign issuer and/or the rules of a foreign stock exchange.

### **3. Insider information of asset management companies obtained by ACRA in connection with rating assignment or another rating action**

3.1. Information about net asset value and an estimate of the investment unit value within the mutual fund, provided that the conditions outlined in Clause 3.11 of this List are observed.

3.2. Information about a company managing a closed-end mutual fund taking the decision on issuance of additional investment units and opening the term of applications filing for acquisition of additional investment units in the closed-end mutual fund, provided that the conditions outlined in Clause 3.11 of this List are observed.

3.3. Information about a management company taking the following decisions, provided that the conditions outlined in Clause 3.11 of this List are observed:



- 1) On suspension of investment unit issuance, or on suspension of issuance, redemption and exchange of investment units of a mutual fund;
- 2) On resumption of investment unit issuance, or on resumption of issuance, redemption and exchange of investment units of a mutual fund.

3.4. Information about employees of an asset management company taking decisions related to making transactions for the account of property constituting the mutual fund, provided that the conditions outlined in Clause 3.12 of this List are observed.

3.5. Information about income on one investment unit in a closed-end mutual fund, subject to be paid out, provided that the conditions outlined in Clause 3.11 of this List are observed.

3.6. Information contained in an internal document of the company managing a mutual fund and setting the procedure for calculation the value of assets in the mutual fund and the amount of liabilities to be covered by these assets, provided that the conditions outlined in Clause 3.12 of this List are observed.

3.7. Information about a real estate construction project financed at the expense of a closed-end mutual fund, which includes property rights under obligations stipulated in a shared construction participation contract that forms legal grounds for such financing, provided that the conditions outlined in Clause 3.12 of this List are observed.

3.8. Information about applications received by an asset management company with claims to redeem or exchange 25% or more of investment units within of a mutual fund, provided that the conditions outlined in Clause 3.11 of this List are observed.

3.9. Information about emergence of grounds for termination of a mutual fund, provided that the conditions outlined in Clause 3.12 of this List are observed.

3.10. Information about assets constituting a mutual fund and their share in its property, provided that the conditions outlined in Clause 3.12 of this List are observed.

3.11. Information concerning investment units of mutual funds, as outlined in Clauses 3.1-3.3, 3.5 and 3.8 of this List, constitutes insider information of the asset management company, if these investment units have been admitted to organized trading, or an application for their admission to organized trading has been filed.

3.12. Information concerning mutual funds, as outlined in Clauses 3.4, 3.6, 3.7, 3.9 and 3.10 of this List, constitutes insider information of the asset management company, if investment units of the specified mutual funds are admitted to organized trading, or an application for their admission to organized trading has been filed.

3.13. If the issuer is an asset management company, whose securities are admitted to organized trading, or an application for their admission to organized trading has been filed, its insider information, in addition to information specified in Clause 3.1 of this List, shall also include information specified in Clause 2 of this List.

#### **4. Insider information received by ACRA in connection with rating assignment or another rating action related to economic entities included into the register as required by Article 23 of the Federal Law of 26 July 2006 No. 135-FZ “On protection of competition” and having a dominant position on certain product markets within the geographical borders of the Russian Federation**

4.1. Information about a market share change of an economic entity with a dominant position on a certain product market, if as a result of this change the market share of this entity exceeded or fell short of 35, 40, 45, 50, 55, 60, 65, 70, 75, 80, 85, 90, 95 percent, and in relation to the given product the conditions set out in Clause 4.20 of this List are observed.

4.2. Information about an economic entity with a dominant market position becoming able to unilaterally determine the product price level and exert a decisive influence on general conditions of sale of the product on the relevant market, provided that in relation to the given product the conditions set out in Clause 4.20 of this List are observed.

4.3. Information about an economic entity with a dominant market position showing an increase or decrease in costs required for production and/or sale of a certain product by 10 or more percent, provided that in relation to the given product the conditions set out in Clause 4.20 of this List are observed.

4.4. Information about an economic entity with a dominant market position showing an increase or decrease production of a certain product by 10 or more percent, provided that in relation to the given product the conditions set out in Clause 4.20 of this List are observed.

4.5. Information about an economic entity with a dominant position on a certain product market reaching an agreement with another economic entity, whose share on this market exceeds one percent, as well as on termination of such agreement or change of its essential terms, if this agreement relates to prices, to conditions of sale and purchase of this product, to access conditions to the corresponding market for other economic entities, including new competitors, to circulation conditions for this product on the market, provided that in relation to the given product the conditions set out in Clause 4.20 of this List are observed.

4.6. Information about an economic entity with a dominant position on a certain product market reaching an agreement with another economic entity envisaging that both economic entities perform some concerted actions or actions by agreement on the relevant market, as well as information about termination of this agreement or change of its essential terms, provided that in relation to the given product the conditions set out in Clause 4.20 of this List are observed.

4.7. Information about an economic entity with a dominant market position taking (not taking) actions that, in line with established procedures, have been recognized an abuse by the economic entity of its dominant position.

4.8. Information about emergence of the grounds for inclusion of an economic entity with a share on a certain product market of over one percent into the same group of entities, to which the economic entity with dominant position on a certain product market belongs, provided that in relation to the given product the conditions set out in Clause 4.20 of this List are observed.

4.9. Information about submission by the antimonopoly authority of a lawsuit demanding a compulsory split of an economic entity with a dominant market position, or withdrawal from its structure of one or several commercial organizations, as well as about the results of arbitration court hearing of such a lawsuit.

4.10. Information about initiation by the antimonopoly authority of a case on violation by the economic entity with a dominant market position of the antimonopoly legislation of the Russian Federation, as well as about the outcome of such case.

4.11. Information about a business entity with a dominant market position complying with an ordinance issued by the antimonopoly authority in relation to a case on violation of the Antimonopoly legislation of the Russian Federation.

4.12. Information about an economic entity with a dominant market position taking a decision on its reorganization or liquidation.

4.13. Information about an economic entity with a dominant market position filing a request about making records in the unified state register of legal entities regarding reorganization, termination of activities or liquidation of such economic entity, and information about refusal to make such records in case the authority performing state registration of legal entities takes such a decision.

4.14. Information about an economic entity with a dominant market position showing signs of insolvency (bankruptcy), as stipulated by the legislation of the Russian Federation on insolvency (bankruptcy).

4.15. Information about the arbitration court accepting a bankruptcy claim against an economic entity with a dominant market position, about the arbitration court recognizing such economic entity bankrupt and launching one of bankruptcy procedures against it, as well as about termination of any bankruptcy proceedings against the economic entity.

4.16. Information about an economic entity with a dominant market position facing a lawsuit with the claim the size amounting to 10 or more percent of its book value as of end of the reporting period (a quarter, a year) preceding the filing of the lawsuit, in respect of which the period for filing accounting (financial) statements has expired, or about any other claim which, if satisfied, could materially affect financial and economic standing of the economic entity, by its own estimates.

4.17. Information about an economic entity with a dominant market position making a transaction that is recognized large in accordance with the legislation of the Russian Federation.

4.18. Information about the election (appointment) of the sole executive body, members of the collective executive body, members of the board of directors (the supervisory board) or any other collegial governance body of an economic entity with a dominant market position, or about transfer of powers of the sole executive body of such economic entity to a managing organization (a manager).

4.19. Information that constitutes accounting (financial) statements of the economic entity with a dominant market position, including its consolidated financial statements.

4.20. Information concerning certain product, as provided by Clauses 4.1-4.6 and 4.8 of this List, constitutes insider information of an economic entity with a dominant market position, if the specified product is admitted to organized trading, or an application for its admission to organized trading has been filed.

4.21. If an economic entity with a dominant market position is the issuer, whose securities are admitted to organized trading, or an application for their admission to organized trading has been filed, its insider information, in addition to information specified in Clause 4 of this List, shall also include information specified in Clause 2 of this List.

## **5. Insider information of trade organizers obtained by ACRA in connection with rating assignment or another rating action**

5.1. Information about an organizer of trade taking decisions:

- 1) On suspension and resumption of organized trading in securities, derivatives, foreign currencies or certain goods;
- 2) On changing conditions (mode) of organized trading in securities, derivatives, foreign currencies or certain goods;
- 3) On inclusion of securities in the list of securities admitted to organized trading (listing of securities);
- 4) On exclusion of securities from the list of securities admitted to organized trading (delisting of securities);
- 5) On termination of organized trading in securities, derivatives, foreign currencies or certain goods.

5.2. Information about a stock exchange taking decisions:

- 1) On inclusion of securities on the quotation list (admission of securities to organized trading with their inclusion on the quotation list);
- 2) On transfer of securities from one quotation list to another;
- 3) On exclusion of securities from the quotation list;
- 4) On suspension and resumption of placement of exchange-traded bonds or Russian depositary receipts.

5.3. Information about a trade organizer concluding a contract on maintaining prices, demand, offer or trade volume of securities, derivatives, foreign currency and/or a certain product, with one side of this contract being a trade participant (market maker), as well as information about changes made to essential clauses of such contract and about its termination.

5.4. Information about the results of exchange-traded bonds placement.

5.5. Information contained in the organized trading rules approved by an authorized body of the trade organizer.

5.6. Information contained in the register of requests for transactions with securities, foreign currencies, certain goods or requests for conclusion of contracts, which are derivative financial instruments, with such requests being submitted to the trade organizer by trading participants, with the exception of information provided to trading participants in accordance with the organized trading rules of the trade organizer.

5.7. Information contained in the register of transactions with securities, foreign currencies, certain goods, or transactions, which are derivative financial instruments, with entries to this register made by the trade organizer, with the exception of information provided to trading participants in accordance with the organized trading rules of the trade organizer.

5.8. Information contained in reports on OTC transactions with securities presented to the stock exchange.

5.9. Information contained in the register of OTC transactions with securities maintained by the stock exchange, with the exception of information provided by the exchange to a person/entity that performed transactions with securities, with such information being presented in the form of extracts from the register on OTC transactions made by this person/entity.

5.10. Information contained in the register of OTC transactions with exchange goods maintained by the exchange, with the exception of information provided by the exchange to the person/entity that performed relevant transactions, with such information being presented in the form of extracts from the register on OTC transactions made by this person/entity.

5.11. If a trade organizer is the issuer, whose securities are admitted to organized trading, or an application for their admission to organized trading has been filed, its insider information, in addition to information specified in Clause 5 of this List, shall also include information specified in Clause 2 of this List.

## **6. Insider information received by ACRA in connection with rating assignment or another rating action related to clearing organizations, as well as depositories and credit institutions that process settlements under transactions made via trade organizers**

6.1. Insider information of clearing organizations, depositories and credit institutions that process settlements under transactions made via trade organizers, includes:

- 1) Information contained in the clearing rules approved by an authorized body of the clearing organization;
- 2) Information contained in clearing members' clearing registers which keep account of clearing members' binding obligations under transactions made through trade

organizers, as well as information about securities, cash, foreign currencies and certain goods required for a clearing participant to fulfill its obligations;

- 3) Information contained in binding orders to a depository, which processes settlements under transactions made via trade organizers, to place securities on a DEPO trading account;
- 4) Information about transactions made through clearing bank accounts, clearing DEPO accounts, clearing commodity accounts;
- 5) Information on transactions made through trading bank accounts, DEPO trading accounts and trading commodity accounts;
- 6) Information about obligations of clearing members, in respect of which clearing is carried out;
- 7) Information about a clearing organization, a depository and/or a credit organization that process settlements under transactions made via trade organizers, showing the signs of insolvency (bankruptcy) stipulated by the legislation of the Russian Federation about insolvency (bankruptcy).

6.2. If a clearing organization, a depository and/or a credit institution processing settlements under transactions made via trade organizers is the issuer, whose securities are admitted to organized trading, or an application for their admission to organized trading has been filed, insider information of such clearing organization, depository and/or credit institution, in addition to information specified in Clause 6.1 of this List, shall also include information specified in Clause 2 of this List.

**7. Insider information received by ACRA in connection with rating assignment or another rating action related to professional securities market participants and other entities engaged in transactions with financial instruments, foreign currency and/or goods in the interests their clients, from whom they receive insider information**

7.1. Information contained in to-be-executed client's security transaction orders when execution of such orders can have a significant effect on prices of such securities, provided that in relation to such securities the conditions set out in Clause 7.7 of this List are observed.

7.2. Information contained in to-be-executed client orders pertaining to agreements that are:

- 1) Derivative financial instruments in cases when execution of such orders can have a significant effect on prices of such securities, provided that in relation to such securities the conditions set out in Clause 7.7 of this List are observed;
- 2) Derivative financial instruments, the underlying asset of which is the product, in cases when execution of such orders could have a significant effect on prices of relevant goods, provided that in relation to such goods the conditions set out in Clause 7.8 of this List are observed.

7.3. Information constituting essential conditions of trust management contracts related to transactions with securities and/or to conclusion of contracts, being derivative financial instruments, in cases where trust management in accordance with these terms and conditions may have a significant impact on prices of relevant securities, provided that in relation to such securities the conditions set out in Clause 7.7 of this List are observed.

7.4. Insider information of persons/entities (those included by a trade organizer in the list of goods trading participants and acting in the interests and at the expense of other persons/entities; other participants in organized trading, engaged in transactions with goods on organized markets in the interests of clients or concluding in the interests of clients on the organized markets contracts being derivative financial instruments), if in respect of a particular product the conditions set out in Clause 7.8 of this List are observed, includes the following information received from clients:

- 1) Information contained in to-be-executed client orders for making transactions with goods in cases when the execution of such orders can have a material effect on the price of relevant goods;
- 2) Information contained in to-be-executed client orders on conclusion of contracts being derivative financial instruments, with the underlying asset being a product, in cases when the execution of such orders can have a material effect on the price of relevant goods.

7.5. Insider information of credit institutions and other legal entities (credit institutions entitled by Bank of Russia licenses to conduct banking operations with foreign currency, as well as other legal entities admitted to organized foreign exchange trading and carrying out foreign currency transactions in the interests of their clients), if in respect of a certain foreign currency the conditions set out in Clause 7.9 of this List are observed, the following information received from clients:

- 1) Information contained in to-be-executed client orders for purchase or sale of foreign currency through trade organizers in cases when the execution of such orders can have a material effect on the price of foreign currency;
- 2) Information contained in the to be executed client orders for conclusion of contracts being derivative financial instruments the basic asset of which is foreign currency, in the case where the execution of such orders could have a material effect on the price of foreign currency.

7.6. Insider information contained in to-be-executed orders referred to in Clauses 7.1-7.5 of this List and received from clients shall be the information on price and volume (quantity) of securities, foreign currency, goods, contracts being financial derivatives and actions that must be carried out pursuant to such orders (purchase (buying) or disposal of (selling), signing a contract (contracts) being a financial derivative).

7.7. Information concerning certain securities and outlined in Clauses 7.1-7.3 of this List constitutes insider information of professional securities market participants engaged in transactions with financial instruments pursuing interests of their clients, if these securities are admitted to organized trading, or an application for their admission to organized trading has been filed.

7.8. Information concerning certain goods and outlined in sub-clause 2 of Clause 7.1 and Clause 7.4 of this List, constitutes insider information of professional securities market participants engaged in transactions with financial instruments pursuing interests of their clients, as well as of persons/entities (those included by a trade organizer in the list of goods trading participants and acting in the interests and at the expense of other persons/entities; other participants in organized trading, engaged in transactions with goods on organized markets in the interests of clients or concluding in the interests of clients on the organized markets contracts being derivative financial instruments), in cases when the specified goods are admitted to organized trading, or an application for their admission to organized trading has been filed.

7.9. Information concerning certain foreign currency and outlined in Clause 7.5 of this List constitutes insider information of credit institutions and other legal entities (credit institutions entitled by Bank of Russia licenses to conduct banking operations with foreign currency, as well as other legal entities admitted to organized foreign exchange trading and carrying out foreign currency transactions in the interests of their clients) in cases when the specified foreign currency is admitted to organized trading, or an application for its admission to organized trading has been filed.

**8. Insider information received by ACRA in connection with rating assignment or another rating action related to securities admitted to organized trading or in respect of which an application has been filed about their admission to organized trading.**