

Annex 1
to minutes of CREDIT BANK OF MOSCOW's
Supervisory Board meeting
No. 06 dated 22.02.2018

CREDIT BANK OF MOSCOW's Insider Information List

1. GENERAL PROVISIONS

1.1. This Insider Information List contains the list of information classified as insider information of CREDIT BANK OF MOSCOW (the "Bank") acting as:

- an issuer whose emission securities are admitted, or are pending admission to, organised trades in the Russian Federation ("organised trades");
- a stock market professional participant, such as a broker and/or asset manager dealing on customers' behalf in securities admitted to, or pending admission to, and/or making on customers' behalf derivative contracts at, organised trades, and receiving insider information from customers;
- a stock market professional participant, such as a depository dealing on customers' behalf in securities admitted to, or pending admission to organised trades, and receiving insider information from customers;
- a credit institution entitled by the Bank of Russia's licenses to make banking operations in foreign currency and making them and/or derivative contracts at organised trades on customers' behalf, and receiving insider information from customers;
- an entity having access to insider information of other entities under civil law contracts made with:
 - issuers whose emission securities are admitted to, or are pending admission to, organised trades ("Issuers");
 - companies managing mutual investment funds whose investment units are admitted to, or are pending admission to, organised trades ("Asset Management Companies");
 - business entities listed in the register referred to in article 23 of Federal Law No. 135-FZ dated 26.07.2006 "On Protection of Competition" and holding a dominant position within geographic boundaries of the Russian Federation in the market of a certain commodity admitted, or pending admission, to organised trades ("Dominant Business Entities");
 - stock market professional participants and credit institutions dealing, on customers' behalf, in financial instruments, foreign currency and/or commodities ("Stock Market Professional Participants" and "Credit Institutions").
 - any entity holding at least 25 percent of votes in the supreme governing body of any Issuer, Asset Management Company, Dominant Business Entity, Stock Market Professional Participant or Credit Institution, or an entity which, by virtue of holding shares (participatory interests) in the charter capital of any of the foregoing, has access to their insider information under federal laws or constitutive documents.
 - any entity having access to information about the submission of a voluntary, compulsory or competing share purchase offer under joint-stock companies legislation of the Russian Federation (such as the offeror or the credit institution issuing the bank guarantee).

1.2. This List is developed in accordance with requirements of applicable laws and regulations, subject to recommendations of regulators and self-regulating organisations, and to internationally recognised insider information control principles.

2. GENERAL DEFINITIONS AND DESIGNATIONS

The following general definitions and designations are used herein:

Insider means any person possessing, or having access to, Insider Information by virtue of his/her corporate or another position, laws, regulations, the Bank's bylaws or any agreement with the Bank. The term "Insider" is not used herein as defined for the purposes of calculating mandatory banking ratios or in relation to loan transactions;

Insider Information means any precise and specific information which was not reported or released and which, if reported or released, may substantially influence prices of financial instruments, foreign currency and/or commodities, and which is covered by the relevant Insider Information list. Insider Information includes that relating to each of the Bank, its customers and counterparties. Insider Information includes, in particular, any information subject to commercial, office, banking, communication (as regards money transfers by post) and any other legally protected secrecy. The Insider Information does not include any information which has become available to the general public, in particular as a result of its reporting, and any investigations, forecasts and assessments, based on public information, in respect of financial instruments, foreign currencies and/or goods, as well as recommendations and/or proposals as to dealing in financial instruments, foreign currencies and/or goods;

controlling person means a person who has, directly or indirectly (through its controlled persons), the power to direct, by virtue of participation in the controlled entity and/or under any asset management, partnership, commission, shareholders' and/or any other agreement relating to the exercise of rights attached to the shares (participatory interests) in the controlled entity, the casting of more than 50 percent of votes in the supreme governing body of the controlled entity or the power to appoint (elect) the sole executive body and/or more than 50 percent of the membership of the collective governing body of the controlled entity;

trades in financial instruments, foreign currency and/or commodities ("Trades") means any trading in, and other actions intended to acquire, dispose of, or otherwise vary interests in, any financial instruments, foreign currency and/or commodities, and any actions related to committing to do any of the foregoing, including placing bids (giving instructions);

Trading Facility has the meaning ascribed to it in Federal Law No. 325-FZ dated 21.11.2011 "On organised trades";

controlled person (controlled entity) means any entity directly or indirectly controlled by a controlling person;

reporting information means any actions intended to make information available to certain recipients as required by the securities legislation of the Russian Federation;

releasing information means any actions:

- intended to make information available to, or release it to, general public, including by way of disclosing it as required by the securities legislation of the Russian Federation;
- related to publication of information in mass media, including electronic, information and telecommunication shared networks (including Internet);
- related to dissemination of information via electronic, information and telecommunication shared networks (including Internet).

3. LIST OF INSIDER INFORMATION OF THE BANK AS AN ISSUER

3.1. Insider Information of the Bank *as an issuer* includes the following information:

- 3.1.1. On convening and holding any general shareholders meeting of the Bank, including its agenda and date, eligible attendees list closing date and resolutions taken by it.
- 3.1.2. On the agenda of, and resolutions taken at, any meeting of the Bank's Supervisory Board.
- 3.1.3. On any failure by the Bank's Supervisory Board to adopt any of the following resolutions required by federal laws to be adopted:
 - on convening of an annual (ordinary) general shareholders meeting of the Bank and other resolutions relating to preparation, convening and holding thereof;
 - on convening (holding) or refusal to convene (hold) an extraordinary general shareholders meeting of the Bank requested by the Bank's audit committee (internal auditor), auditor or shareholder(s) holding at least 10 percent of the voting shares in the Bank;
 - on inclusion or refusal to include any proposed items into the agenda of a general shareholders meeting of the Bank or any nominees to the list of nominees for voting at elections to the relevant body of the Bank proposed by shareholder(s) holding in aggregate at least 2 percent of the voting shares in the Bank;
 - on appointment of the Chairman of the Management Board of the Bank, at its two consecutive meetings or within two months of termination or expiration of the powers of the Bank's previously formed sole executive body, as provided for by clause 6 of article 69 of Federal Law No. 208-FZ "On Joint-Stock Companies" dated 26.12.95 (the "JSC Law");
 - on early removal of the Chairman of the Management Board of the Bank, at its two consecutive meetings, as provided for by clause 6 of article 69 of the JSC Law;
 - on convening (holding) an extraordinary general shareholders meeting of the Bank upon the Bank's Supervisory Board membership falling below its quorum;
 - on formation of a temporary sole executive body of the Bank and on holding an extraordinary general shareholders meeting of the Bank to resolve on early removal of the Chairman of the Management Board of the Bank or the managing organisation (manager) and on formation of a new sole executive body of the Bank or on delegation of its powers to a managing organisation (manager) where the Bank's Supervisory Board has resolved to suspend the Chairman of the Management Board of the Bank or the managing organisation (manager);
 - on any advice regarding any voluntary, including competing, or mandatory offer received by the Bank, which advice contains appraisal of the offered price for the emission securities to be acquired and of any potential change in their market value upon such acquisition, appraisal of the offeror's plans regarding the Bank, including its staff;
- 3.1.4. On the Bank applying for entries to be made to the unified state register of legal entities on its reorganisation, winding-up or liquidation, and any refusal by the authority responsible for state registration of legal entities to make any such entries.
- 3.1.5. On the Bank coming or ceasing to have any material controlled entity.
- 3.1.6. On the Bank coming or ceasing to have a controlling person.
- 3.1.7. On the Bank's controlling entity, material controlled entity or any provider of security for the Bank's bonds deciding to reorganise or liquidate if the conditions of clause 3.4 hereof are met in respect of such provider and/or the relevant bonds.

- 3.1.8. On the Bank's controlling entity, material controlled entity or any provider of security for the Bank's bonds applying for entries to be made to the unified state register of legal entities on their reorganisation, winding-up or liquidation, if the conditions of clause 3.4 hereof are met in respect of such provider and/or the relevant bonds.
- 3.1.9. On the Bank or its controlling entity, material controlled entity or any provider of security for its bonds coming to meet the insolvency (bankruptcy) criteria under insolvency (bankruptcy) laws of the Russian Federation, if the conditions of clause 3.4 hereof are met in respect of such provider and/or the relevant bonds.
- 3.1.10. On any arbitration court admitting a petition for the Bank, its controlling entity, material controlled entity or any provider of security for its bonds to be adjudicated bankrupt, and on any arbitration court adjudicating any of them bankrupt, or instituting or terminating any bankruptcy proceedings against them, if the conditions of clause 3.4 hereof are met in respect of such provider and/or the relevant bonds.
- 3.1.11. On any claim being filed against the Bank, its controlling entity, material controlled entity or any provider of security for its bonds for an amount of at least 10 percent of the book value of their assets as of the end of the reporting period which ended before the claim was filed, or any other claim which, if satisfied, may, in the Bank's opinion, materially affect its or any of the above entities' financial and business position, if the conditions of clause 3.4 hereof are met in respect of such provider and/or the relevant bonds.
- 3.1.12. On any record date in respect of the Bank's emission securities, including the record date for participating in a General Shareholders' Meeting, if the conditions of clause 3.3 hereof are met.
- 3.1.13. On the Bank's authorised bodies adopting any of the following resolutions if the conditions of clause 3.2 hereof are met:
- to place any emission securities of the Bank;
 - to choose the placement starting date of any emission securities of the Bank;
 - to suspend the placement of the Bank's emission securities;
 - to refuse the placement of the Bank's emission securities issues (additional issues);
 - to terminate fully (partially) any obligations in respect of repayment of the principal, unpaid interest or financial sanctions for non-performance of obligations under subordinated bonds;
 - to refuse unilaterally to pay any interest (coupon) under subordinated bonds.
- 3.1.14. On completion of placement of any emission securities of the Bank if the conditions of clause 3.2 hereof are met.
- 3.1.15. On the Bank applying for the state registration of any emission securities issue (additional issue), registration of a securities prospectus, state registration of a bond programme, registration of any amendments to a resolution on emission securities issue (additional issue) and/or to the relevant prospectus, state registration of changes to a bond programme or to the terms of any bond issue (additional issue) and/or to the relevant prospectus, state registration of any emission securities issue (additional issue) closing report, if the conditions of clause 3.2 hereof are met.
- 3.1.16. On the Bank filing any emission securities issue (additional issue) closing notice if the conditions of clause 3.2 hereof are met.
- 3.1.17. On any arbitration court invalidating any issue (additional issue) of the Bank's emission securities.

- 3.1.18. On redemption of any emission securities of the Bank if the conditions of clause 3.3 hereof are met.
- 3.1.19. On accrued and/or paid income on any emission securities of the Bank if the conditions of clause 3.3 hereof are met.
- 3.1.20. On the Bank contracting with any Russian Trading Facility for admission of its emission securities to organised trades thereat or with any Russian exchange for listing of the same thereon.
- 3.1.21. On the Bank contracting for its emission securities or a foreign issuer's securities certifying the rights thereto to be admitted to trading in any foreign organised (regulated) financial market or a contract with any foreign exchange for listing of the same thereon.
- 3.1.22. On the Bank's emission securities or a foreign issuer's securities certifying the rights thereto being admitted to, or removed from, trading in any foreign organised (regulated) financial market, or being listed on or de-listed from any foreign exchange.
- 3.1.23. On the Bank making any stabilisation agreement regarding the Russian issuer's emission securities (or a foreign issuer's securities certifying rights thereto), and the terms and termination of any such agreement, if the conditions of clause 3.3 hereof are met.
- 3.1.24. On the Bank applying for a permit from the Bank of Russia to place and/or put into circulation the Bank's emission securities outside the Russian Federation.
- 3.1.25. On the Bank failing to perform its obligations to holders of its emission securities.
- 3.1.26. On any person acquiring or ceasing to have the power to directly or indirectly (through its controlled persons), independently or in concert with other persons affiliated with it by any asset management, partnership, commission, shareholders' and/or any other agreement relating to the exercise of rights attached to the shares in the Bank, direct the casting of a certain number of votes attached to the voting shares constituting the Bank's charter capital if such number represents 5 percent or becomes 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 constituting the Bank's charter capital.
- 3.1.27. On the Bank receiving, and on amending, any voluntary, including competing, or mandatory offer to acquire its emission securities made under chapter XI.1 of the JSC Law.
- 3.1.28. On the Bank receiving any notice of entitlement to demand, or any demand, to buy back its emission securities under chapter XI.1 of the JSC Law.
- 3.1.29. On any mistakes identified in any previously disclosed accounting (financial) statements of the Bank if such mistakes may materially affect the price of its emission securities.
- 3.1.30. On the Bank or any provider of security for its bonds making any transaction for at least 10 percent of the book value of its assets as of the end of the reporting period which ended before the transaction was made, if the conditions of clause 3.4 hereof are met in respect of such provider and/or the relevant bonds.
- 3.1.31. On the Bank's controlling entity or material controlled entity making any transaction qualifying as a major transaction under Russian law.
- 3.1.32. On the Bank making any interested party transaction if the value of such transaction:
 - exceeds 500 million roubles or represents two or more percent of the book value of the Bank's assets as at the end of the last complete reporting period preceding the date of granting consent to the transaction by the Bank's authorised management body or, in the absence of such consent, as at the end of the last complete reporting period which ended before the Bank made such transaction (if the book value of the Bank's assets as at the date specified in this paragraph is no more than 100 billion roubles);

– one or more percent of the book value of the Bank’s assets as at the end of the last complete reporting period preceding the date of granting consent to the transaction by the Bank’s authorised management body or, in the absence of such consent, as at the end of the last complete reporting period which ended before the Bank made such transaction (if the book value of the Bank’ assets as at the date specified in this paragraph exceeds 100 billion roubles).

- 3.1.33. On any change to the composition and/or amount of pledge securing any bonds of the Bank that meet the conditions of clause 3.4 hereof and, in the case of any mortgage-backed bonds of the Bank, details of any such changes resulting from replacement of any mortgage-backed claim or any other property in the mortgage collateral pool of the bonds representing at least 10 percent of the pool’s value (monetary value).
- 3.1.34. On any 10 percent or greater change in the total assets of, or any other material, in the Bank’s opinion, change in the financial and business condition of any provider of security for its bonds, if the conditions of clause 3.4 hereof are met in respect of such provider and/or the relevant bonds.
- 3.1.35. On the Bank acquiring or ceasing to have the power to directly or indirectly (through its controlled persons), independently or in concert with other persons affiliated with it by any asset management, partnership, commission, shareholders’ and/or any other agreement relating to the exercise of rights attached to the shares (or participatory interests) in any entity whose emission securities are admitted to organised trades or whose assets exceed RUB 5 billion, direct the casting of a certain number of votes attached to the voting shares (or participatory interests) constituting such entity’s charter capital if such number represents 5 percent or becomes 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 (or participatory interests) constituting such entity’s charter capital.
- 3.1.36. On any person acquiring or ceasing to have the power to directly or indirectly (through its controlled persons), independently or in concert with other persons affiliated with it by any asset management, partnership, commission, shareholders’ and/or any other agreement relating to the exercise of rights attached to the shares (or participatory interests) in any surety for the Bank’s bonds, direct the casting of a certain number of votes attached to the voting shares (or participatory interests) constituting such surety’s charter capital if such number represents 5 percent or becomes 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 (or participatory interests) constituting such surety’s charter capital, if the conditions of clause 3.4 hereof are met in respect of such surety and/or the relevant bonds.
- 3.1.37. On the Bank, its controlling entity or controlled entity making a contract obliging it to acquire the Bank’s emission securities, if the conditions of clause 3.3 hereof are met.
- 3.1.38. On obtaining, suspending, resuming, renewing, revoking (cancelling) or otherwise terminating any permit (license) of the Bank for any activity material to the Bank from the financial and business point of view.
- 3.1.39. On expiration of the term of office of the Chairman and/or members of the Management Board of the Bank.
- 3.1.40. On any change to the equity interests held in the Bank or its material controlled entities by:
- members of the Bank’s Supervisory Board or Management Board or the person holding the office of the Chairman of the Management Board of the Bank;
 - members of the board of directors (supervisory board) or the collective executive body or the person holding the office of (acting as) the sole executive body of the management organisation if the powers of the Bank’s sole executive body have been delegated thereto.
- 3.1.41. On any holders of the Bank’s bonds becoming, and/or ceasing to be, entitled to put them to the Bank, if the conditions of clause 3.3 hereof are met.

- 3.1.42. On the Bank engaging or replacing any intermediaries for performing its obligations under any of its bonds or other emission securities, on their names, addresses and service fees and on any change in such details.
- 3.1.43. On any dispute relating to the Bank's incorporation, management or participation in it if the determination thereof may materially affect the price of its emission securities.
- 3.1.44. On any provider of security for the Bank's bonds being demanded to perform obligations thereunder, if the conditions of clause 3.4 hereof are met in respect of such provider and/or the relevant bonds.
- 3.1.45. On placement outside the Russian Federation of bonds or other financial instruments certifying any borrowing obligations to be performed for the Bank's account.
- 3.1.46. On any voting shares in the Bank or a foreign issuer's securities certifying the rights thereto being acquired (or disposed of) by the Bank and/or its controlled entities, unless they are brokers and/or asset managers and acted on their own behalf but for account of a customer who is not the Bank and/or its controlled entity.
- 3.1.47. Any information sent or reported by the Bank to a relevant authority (relevant entity) of a foreign state, a foreign exchange and/or other entities in accordance with foreign law to be disclosed or reported to foreign investors in connection with the Bank's emission securities placement or circulation outside the Russian Federation, in particular by way of acquiring a foreign issuer's securities to be placed (placed) under foreign law, if such information may materially affect the price of the Bank's emission securities.
- 3.1.48. Information contained in the Bank's annual accounting (financial) statements and consolidated financial statements and in the auditor's reports thereon.
- 3.1.49. Information contained in the Bank's interim accounting (financial) statements and consolidated financial statements for any reporting period consisting of one, three, six or nine months of a given year, and in the auditor's reports thereon, if the Bank has interim financial statements and consolidated financial statements prepared under the International Financial Reporting Standards (IFRS) enacted in the Russian Federation as provided for by the Russian Government's decree No. 107 dated 25.02.2011 "On Approval of Regulations on Recognition of the International Financial Reporting Standards and Interpretations of the International Financial Reporting Standards for Use in the Russian Federation", contained in such financial statements of the Bank and, if audited, in the auditor's reports thereon.
- 3.1.50. Terms of placement of the Bank's emission securities set forth by the securities issue (additional issue) resolution approved by its authorised body, by the approved bond programme or approved terms of the bond issue (additional issue) under the bond programme, to the extent not already disclosed as required by Russian securities market laws, if the conditions of clause 3.2 hereof are met.
- 3.1.51. Information contained in the Bank's emission securities issue closing report (notice) approved by its authorised body to the extent not already disclosed as required by Russian securities market laws, if the conditions of clause 3.2 hereof are met.
- 3.1.52. Information contained in the securities prospectus approved by the Bank's authorised body to the extent not already disclosed or reported as required by Russian securities market laws.
- 3.1.53. Information contained in quarterly reports signed by the Bank's authorised persons to the extent not already disclosed or reported as required by Russian securities market laws.
- 3.1.54. Information contained in annual issuer reports signed by the Bank's authorised persons to the extent not already disclosed or reported as required by Russian securities market laws.
- 3.1.55. On the Bank making any strategic partnership or other agreement not covered by clauses 3.1.20, 3.1.21, 3.1.23, 3.1.30, 3.1.32 and 3.1.37 hereof, if the making of such agreements may materially affect the price of the Bank's emission securities.

- 3.1.56. On holding and the agenda of (or on refusal to hold) a general meeting of the Bank's bond holders, and on any resolutions made by any such meeting, if the conditions of clause 3.2 or clause 3.3 hereof are met.
- 3.1.57. On the Bank sending (filing) notices containing information about a representative of bond holders, if the conditions of clause 3.2 or clause 3.3 hereof are met.
- 3.1.58. On any court, arbitration court or executive authority charged with enforcement functions taking interim measures with respect to the cash or other property of the Bank, its controlling entity, its material controlled entity, or the securing party of the Bank's bonds, if the conditions of clause 3.4 hereof are met in respect of such securing party and/or the relevant bonds, which (cash or other property) represent 10 or more percent of the book value of the above entities' assets as at the end of the last complete reporting period preceding the date of taking such interim measures.
- 3.1.59. On opening a criminal case (as communicated to the Bank by preliminary investigation or criminal inquiry bodies) against any member of the Supervisory Board of the Bank, the Chairman of the Management Board of the Bank, the sole executive body of its controlling entity, the sole executive body of its material controlled entity, or the securing party of its bonds, if the conditions of clause 3.4 hereof are met in respect of such securing party and/or the relevant bonds.
- 3.2. Information listed in clauses 3.1.13-3.1.16, 3.1.50, 3.1.51, 3.1.56 and 3.1.57 hereof relating to any emission securities placed by the Bank constitutes its Insider Information if:
- the securities are placed by way of organised trades;
 - the securities are placed as a tap issue if the securities of the initial issue are admitted, or are pending admission, to organised trades.
- 3.3. Information listed in clauses 3.1.12, 3.1.18-3.1.19, 3.1.23, 3.1.37, 3.1.41, 3.1.56 and 3.1.57 hereof relating to any placed (circulating) emission securities of the Bank constitutes its Insider Information if such emission securities are admitted, or are pending admission, to organised trades.
- 3.4. Information listed in clauses 3.1.7-3.1.11, 3.1.30, 3.1.33-3.1.34, 3.1.36, 3.1.44, 3.1.58 and 3.1.59 hereof relating to any provider of, and to the terms of, security for the Bank's bonds constitutes the Bank's Insider Information if such bonds are admitted, or are pending admission, to organised trades.
- Information listed in clauses 3.1.7-3.1.11, 3.1.30, 3.1.34 and 3.1.59 hereof relating to any provider of security for the Bank's bonds does not constitute the Bank's Insider Information if such security is provided by the Russian Federation in the form of its state guarantee, by any of its constituent entities in the form of such entity's state guarantee and/or by a municipality in the form of a municipal guarantee.
- 3.5. The Bank's Insider Information does not include any information and/or data derived therefrom shared by the Bank and/or any person(s) engaged by it with any potential buyers or used by the Bank or a person(s) engaged by it to advise or otherwise induce any potential buyers to buy the Bank's emission securities placed (to be placed) and/or offered (to be offered) in or outside the Russian Federation, in particular by way of placing a foreign issuer's securities certifying the rights to the Bank's emission securities, provided that any such potential buyers are notified that the same may only be used by them to decide whether to buy any such securities.

4. LIST OF INSIDER INFORMATION OF THE BANK AS A STOCK MARKET PROFESSIONAL PARTICIPANT AND A CREDIT INSTITUTION

- 4.1. Insider Information of the Bank as a **broker and/or asset manager** making Trades in financial instruments, foreign currencies and/or goods on customers' behalf includes the following information received from customers:
- contents of any outstanding customer orders for trades in securities whose prices may be materially affected by execution thereof and which meet the conditions of clause 4.5 hereof;

- contents of any outstanding customer orders for making derivative contracts in respect of securities whose prices may be materially affected by execution thereof and which meet the conditions of clause 4.5 hereof;
 - contents of any outstanding customer orders for making derivative contracts of which the underlying asset is goods whose price may be materially affected by execution thereof and which meet the conditions of clause 4.7 hereof;
 - essential terms of any asset management agreements related to trading in, and/or making derivative contracts in respect of, securities whose prices may be materially affected by doing so and which meet the conditions of clause 4.5 hereof;
 - decisions of any asset manager's employees related to trading in, and/or making derivative contracts in respect of, securities whose prices may be materially affected by doing so and which meet the conditions of clause 4.5 hereof.
- 4.2. Insider Information of the Bank **as a depository** includes any information about transactions on customers' securities accounts, if such information may materially affect the price of securities and if the conditions of clause 4.5 hereof are met.
- 4.3. Insider Information of the Bank as a credit institution includes the following information received from customers:
- contents of any outstanding customer orders to buy or sell a foreign currency via Trading Facilities where execution thereof may materially affect its price;
 - contents of any outstanding customer orders for making derivative contracts of which the underlying asset is a foreign currency whose price may be materially affected by execution thereof; if that foreign currency meets the conditions of clause 4.6 hereof.

Insider Information of the Bank as a credit institution includes any information about the Bank's foreign currency transactions related to execution of banking operations on customer's behalf, if such operations require that the Bank make such transactions at organised trades and doing so may materially affect the price of the foreign currency, if that foreign currency meets the conditions of clause 4.6 hereof.

- 4.4. Insider Information contained in any outstanding customer orders mentioned in clauses 4.1 and 4.3 hereof includes the price and amount (number) of securities, foreign currency, derivative contracts, actions ordered (acquisition (purchase), disposal (sale), or making derivative contract(s)).
- 4.5. Information relating to certain securities as set out in clauses 4.1 and 4.2 hereof constitutes Insider Information of the Bank as a stock market professional participant dealing in financial instruments on customers' behalf, if such securities are admitted, or are pending admission, to organised trades.
- 4.6. Information relating to a certain foreign currency as set out in clause 4.3 hereof constitutes the Bank's Insider Information, if such foreign currency is admitted, or is pending admission, to organised trades.
- 4.7. Information relating to certain goods as set out in clause 4.1 hereof constitutes the Insider information of stock market professional participants making trades in financial instruments on customers' behalf, if such goods are admitted, or is pending admission, to organised trades.

5. LIST OF INSIDER INFORMATION OF THE BANK AS AN ORGANISATION HAVING ACCESS TO INSIDER INFORMATION OF LEGAL ENTITIES UNDER CIVIL CONTRACTS MADE WITH THEM

- 5.1. Insider Information of any **legal entities** (Issuers; Asset Management Companies; Dominant Business Entities; Stock Market Professional Participants and Credit Institutions) is that referred to in their approved lists of Insider Information disclosed by them on their official websites.

- 5.2. Any Issuers' Insider Information accessible to the Bank under any civil contracts made with such Issuer in the course of the Bank's financial market activities related to issue arrangement and payment agency services and other activities includes any information which, if released or reported, may materially affect the price of, and/or of any derivatives of which the underlying asset is, such Issuer's emission securities admitted or pending admission to organised trades.
- 5.3. Insider Information of any **Asset Management Companies; Stock Market Professional Participants and Credit Institutions** is that accessible to the Bank under any civil contracts made with them and contained in any orders placed with the Bank thereunder and/or any other information which, if released or reported, may, in the Bank's opinion and with reference to the Bank of Russia's regulations, materially affect the prices of financial instruments, foreign currency and/or commodities.
- 5.4. Insider Information of any **Dominant Business Entities** is that accessible to the Bank under any civil contracts made with them, which, if released or reported, may materially affect the price of, and / or of any derivatives of which the underlying asset is, such Dominant Business Entity's goods admitted or pending admission to organised trades.

6. INSIDER INFORMATION DISCLOSURE TERMS AND TIMING

- 6.1. Insider Information of the Bank as an issuer is subject to disclosure by it as and when required by Russian laws applicable to emission securities issuers, or by this List.

As provided for by article 2 hereof, any information ceases to be Insider Information upon its public disclosure.

- 6.2. Any information constituting the Bank's Insider Information disclosed by the Bank as provided for by Russian laws applicable to disclosure by securities issuers, is not required to be further disclosed by way of Insider Information disclosure announcement.
- 6.3. Where Russian laws require material facts of emission securities issuers to be announced through a real-time information resource provided by an information agency (a "news feed"), announcements related to the Bank's Insider Information shall be published in a news feed of any one of the information agencies authorised to handle securities market disclosure (a "securities market information provider") before 10:00 a.m. Moscow time on the last day by which such publication must be made.
- 6.4. The Bank shall ensure free and easy access to any information it publishes on the Internet and inform on demand any interested parties of the address of the Internet page where any such information is published.
- 6.5. Any Insider Information announcements of the Bank as an issuer shall be published:
- in a news feed within 1 day;
 - on its website www.mkb.ru within 2 days.
- of the date of occurrence of the relevant fact (event, act) or of the date the Bank has or should have become aware of any such occurrence.
- 6.6. Any Insider Information of the Bank as an issuer contained in the Bank's documents, including those to be approved by authorised bodies and/or signed by authorised persons of the Bank, shall be disclosed by providing access thereto to any parties interested therein irrespective of the purpose of obtaining the same.
- 6.7. Access to the Bank's Insider Information referred to in cl. 4.6 hereof shall be provided:
- by publishing the text of the document containing the Bank's Insider Information on its website www.mkb.ru within 2 days of:

- approval thereof by an authorised body of the Bank, or, if such authorised body is collective, of the making (or of expiry of the period allowed by legislation of the Russian Federation for making) of the minutes of the relevant meeting of such body;
 - signing thereof by authorised persons of the Bank, if it is not subject to approval by an authorised body of the Bank;
- by publishing an announcement in a news feed about the terms of access to the Insider Information contained in the Bank's document within 1 day of publishing the text of such document on its website www.mkb.ru;
 - by providing a copy of the document containing the Bank's Insider Information on demand to any interested party within 7 days of demand for a charge not exceeding the cost of making of the copy.
- 6.8. Access to the Bank's Insider Information contained in any emission securities issue (additional issue) resolution, securities prospectus or emission securities issue (additional issue) closing report, in each case approved by an authorised body of the Bank, shall be provided as and when set out in cl. 6.7 hereof counting from the earlier of the date of announcement of the state registration or registration of the same, respectively, published on the Internet page of the relevant registration authority or the date of receipt by the Bank of such registration authority's written notice of such state registration (registration) by mail, facsimile, email or delivery against signature.
- 6.9. Unless otherwise provided for by Russian laws, Insider Information announcements (documents containing Insider Information) of the Bank as an issuer must be available on the Internet at www.mkb.ru for at least 12 months of being published on the Internet.
- 6.10. Any changes to Insider Information previously disclosed or reported by the Bank shall be disclosed or reported by the Bank in the same manner not later than the next business day after such changes have, or must have, become known.
- 6.11. **Disclosure does not apply to:**
- 6.11.1. Any Insider Information of the Bank as an issuer relating to:
- any resolutions made by the Supervisory Board on any matters reserved to it by the Bank's charter (constitutive documents), but not by federal laws, if such information is classified by the Bank as its confidential information;
 - the terms of any stabilisation agreement regarding the Bank's emission securities (or a foreign issuer's securities certifying rights thereto), except for its applicability period.
- 6.11.2. Any Insider Information of the Bank as a stock market professional participant dealing in financial instruments on customers' behalf:
- contained in any outstanding customer orders for trades in securities;
 - contained in any outstanding customer orders for making derivative contracts;
 - representing essential terms of any asset management agreements related to trading in securities and/or making derivative contracts.
 - concerning any decisions of the asset manager's employees related to trading in securities and/or making derivative contracts;
 - any information about transaction on customers' securities accounts.
- 6.11.3. Any Insider Information of the Bank as a credit institution dealing in foreign currency via Trading Facilities on customers' behalf:
- contained in any outstanding customer orders to buy or sell foreign currency via trading facilities;

- contained in any outstanding customer orders for making derivative contracts of which the underlying asset is a foreign currency
- any information about the Bank's foreign currency transactions related to execution of banking operations on customer's behalf.

7. CONCLUDING PROVISIONS

- 7.1. This List is subject to approval by the Bank's Supervisory Board.
- 7.2. The Bank's Supervisory Board shall, whenever necessary, review and amend this List as required by the laws and regulations governing Insider Information treatment.

Chairman of the Supervisory Board
of CREDIT BANK OF MOSCOW

William Forrester Owens