

Open Joint-Stock Company Promsvyazbank



**APPROVED BY:**

Minutes No. 10-11/SD  
of the Board of Directors,  
OJSC Promsvyazbank  
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**No. 11-22-02**

# **REGULATIONS**

on Insider Information

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## 1. TERMS AND DEFINITIONS

For purposes of these *Regulations on Insider Information* (hereinafter “this document”), the following terms, definitions and abbreviations are used:

**Bank** – Open Joint-Stock Company Promsvyazbank;

**Insider** – a person, who possesses or has access to the Insider Information subject to its official capacity or any other capacity, pursuant to laws, legal regulations, Bank's internal documents and agreement with the Bank.

In this document, the term “Insider” is not used in the meaning ascribed to it for purposes of calculation of banks’ statutory ratios and for purposes of loan deals;

**Insider Information** – accurate and specific information, which has not been distributed or provided (including information constituting commercial secret, official secret, bank secret, communication secret (including information about postal money transfers) and any other legally protected secret), which distribution or provision can significantly affect prices for financial instruments, foreign currency and/or Commodities, and which is referred by the Bank to the Insider Information;

**Transactions with Financial Instruments, Foreign Currency and/or Commodities** (hereinafter the “Transactions”) – transactions and other actions related to acquisition, disposition, other changes in rights to financial instruments, foreign currency and/or Commodities, and actions related to assuming of obligations to perform the above actions, including making of offers (giving of instructions);

**Trade Organizer** – stock exchange, currency exchange, any other organization, which pursuant to federal laws organizes listing of financial instruments, foreign currency and/or Commodities;

**Provision of Information** – actions intended to ensure receipt of information by certain persons according to securities laws of the Russian Federation;

**Distribution (Disclosure) of Information** – actions:

a) intended to ensure receipt of information by general public or transfer of information to general public, including by its disclosure according to securities laws of the Russian Federation;

b) related to publishing of information in media outlets, including in public electronic, data telecommunications networks (inclusive of Internet);

c) related to distribution of information through public electronic, data telecommunications networks (inclusive of Internet);

**Commodities** – things, other than securities, admitted for listing at organized trades in the Russian Federation or specified in the request made for admission of the same to the said listing;

**Bank’s Securities** – Bank’s issue-grade securities, including common and preference shares, bonds and depositary receipts issued for Bank’s shares and Eurobonds.

## 2. GENERAL PROVISIONS

**2.1.** This document establishes the procedure of keeping the list of Insiders, principal obligations of Insiders, manner and time for disclosure of Insider Information, procedure for granting access to Insider Information, rules for keeping Insider Information confidential, procedures ensuring compliance with laws of the Russian Federation. This document also determines the procedures of using Confidential Information and notification of made Transactions.

**2.2.** This document is intended to ensure:

- protection of rights and legal interests of investors in course of Transactions with financial instruments, foreign currency and/or Commodities;
  - monitoring of Insiders' activity based on established limitations to use and disposal of Insider Information and liability for breach of such limitations.
- 2.3.** Handling of Insider Information is governed by the following regulations:
- Federal Law *“Concerning Banks and Banking”* dated 02 December 1990 No. 395-1 (as amended);
  - Federal Law *“Concerning Joint-Stock Companies”* dated 26 December 1995 No. 208-FZ (as amended) (hereinafter the “Federal Law No. 208-FZ”);
  - Federal Law *“Concerning Securities Market”* dated 24 April 1996 No. 39-FZ (as amended) (hereinafter the “Federal Law No. 39-FZ”);
  - Federal Law *“Concerning Counteraction of Unlawful Use of Insider Information and Market Manipulation and Concerning Amendments to Certain Legislative Acts of the Russian Federation”* dated 27 July 2010 No. 224-FZ (hereinafter the “Federal Law No. 224-FZ”);
  - Federal Law *“Concerning the Protection of Competition”* dated 26 July 2006 No. 135-FZ (as amended) (hereinafter the “Federal Law No. 135-FZ”);
  - Regulation of the Federal Securities Market Committee *“Concerning Recommendation to Application of Code of Corporate Conduct”* dated 04 April 2002 No. 421/r;
  - Legal regulations of the Russian Federal Securities Market Committee;
  - Legal regulations of the US Securities and Exchange Commission (SEC);
  - Legal regulations of the UK Financial Services Authority (FSA);
  - Listing rules of Russian and foreign stock exchanges (if subject to listing procedure).

Where any new legislative and other legal regulations governing the procedure of handling of Insider Information are adopted or any such existing regulations are amended, this document, before amended, shall be in effect to the extent not contradicting such amendments.

### **3. LISTS OF INFORMATION RELATED TO INSIDER INFORMATION**

**3.1.** The Bank is the Insider acting as:

**3.1.1.** issuer, which issue-grade securities are admitted by the Trade Organizer to listing in the securities market, or an application for which admission to listing has been submitted;

**3.1.2.** securities trader – broker and/or security trustee, who for the benefit of clients makes Transactions with securities admitted to listing by the Trade Organizer in the securities market, or an application for admission of which to listing has been submitted to the Trade Organizer, and/or who for the benefit of clients makes contracts at stock exchange constituting derivative financial instruments;

**3.1.3.** exchange intermediary, who for the benefit of clients makes contracts at trades of the Trade Organizer, which constitute derivative financial instruments, and which underlying asset is Commodities;

**3.1.4.** credit organization, which for the benefit of clients makes Transactions with foreign currency at stock exchange;

**3.1.5.** organization, which has access to Insider Information of legal entities pursuant to civil law contracts made with respective legal entities:

- issuers, which issue-grade securities are admitted to listing by the Trade Organizer, or an application for their admission to listing has been submitted to the Trade Organizer (hereinafter the “Issuers”);
- management companies of unit investment trusts, which investment units were admitted to listing by the Trade Organizer, or an application for admission of which to listing has been submitted to the Trade Organizer (hereinafter the “Management Companies”);
- economic entities included into the register, as stipulated by clause 23 of the Federal Law No. 135-FZ, and holding the dominant position within the geographical boundaries of the Russian Federation in the market of certain product, which was admitted to listing at organized trades in the Russian Federation, or an application for admission of which to listing has been submitted (hereinafter the “Dominating Economic Entities”);
- securities traders and other persons, who for the benefit of clients make transactions with financial instruments, foreign currency and/or Commodities.

**3.2.** The Insider Information of the Bank, acting as issuer, includes information:

**3.2.1.** about convening and holding of General Meeting of Bank’s shareholders and decisions adopted by the General Meeting of Bank’s shareholders;

**3.2.2.** about convening of a meeting by the Bank’s Board of Directors and its agenda, and about the following decisions adopted by the Bank’s Board of Directors:

- election (re-election) of Chairman of the Bank’s Board of Directors, and if absent – member of the Bank’s Board of Directors, who acts as Chairman of the Bank’s Board of Directors;
- consent to simultaneous holding by Bank’s Chairman and members of the Bank’s Board of offices in management bodies of other organizations;
- placement of Bank’s Securities;
- determination of price for placement or repurchase of Bank’s shares and determination of money value of property (non-monetary assets) contributed as payment for placed Bank’s shares;
- Bank’s acquisition of placed Bank’s Securities;
- election of Bank’s President, members of Bank’s Board and early revocation (suspension) of their powers;
- recommendations as to size of dividends payable on Bank’s shares and procedure of their distribution;
- approval of Bank’s internal documents;
- approval of deals recognized as major deals and/or interested party deals pursuant to laws of the Russian Federation;
- approval of agenda of the General Meeting of Bank’s shareholders and other decisions related to preparation, convening and holding of the General Meeting of Bank’s shareholders;
- inclusion of issues (proposing to adopt decisions under issues by the General Meeting of Bank’s shareholders) to the General Meeting of Bank’s shareholders, as such issues are specified in subclauses 2, 6 and 14 – 19 of clause 1, article 48 of the Federal Law No. 208-FZ;

- recommendations with respect to a voluntary, including competing, or mandatory offer received by the Bank, which is stipulated by chapter XI. 1 of the Federal Law No. 208-FZ;
- approving of registrar, which keeps the register of holders of registered Securities of the Bank, and terms and conditions of contract with such registrar, and termination of such contract;
- creation (liquidation) of branches and/or opening (closure) of Bank's representations;

**3.2.3.** about **non-adoption** by the Bank's Board of Directors of decisions, which were to be adopted pursuant to Federal Laws of the Russian Federation:

- convening of annual (ordinary) General Meeting of Bank's shareholders and other decisions related to preparation, convening and holding of general (ordinary) General Meeting of Bank's shareholders;
- convening (holding) or refusal to convene (hold) extraordinary General Meeting of Bank's shareholders by request of the Bank's auditing committee (auditor), Bank's internal auditor or shareholders (shareholder), which (who) hold(s) at least 10 percent of voting shares in the Bank;
- inclusion or refusal to include proposed issues to agenda of the General Meeting of Bank's shareholders, and proposed nominees – to the list of nominees to a respective Bank's body for voting purposes, which were proposed by shareholders (shareholder) holding in aggregate at least 2 percent of voting shares in the Bank;
- decisions as to election of Bank's President adopted at two consecutive meetings or during two months following the revocation or expiration of powers of the earlier elected Bank's President according to clause 6, article 69 of the Federal Law No. 208-FZ;
- decisions as to early revocation of powers of Bank's President adopted at two consecutive meetings according to clause 7, article 69 of the Federal Law No. 208-FZ;
- convening (holding) of extraordinary General Meeting of Bank's shareholders, where number of members of the Bank's Board of Directors becomes less than required for quorum at meetings of the Bank's Board of Directors;
- election of the Bank's Acting President and holding of extraordinary General Meeting of Bank's shareholders for deciding on early revocation of its powers and on election of new Bank's President;

**3.2.4.** about submission by the Bank of the application for introduction of records to the Uniform State Register of Legal Entities, as connected with reorganization, cessation or liquidation of the Bank, and where the authority responsible for state registration of legal entities decides to refuse to introduce the said records – details of such decision;

**3.2.5.** about an organization, which became controlled by the Bank and which has substantial significance for the Bank, and about termination of grounds for such control over such organization;

**3.2.6.** about a person, which became controlling the Bank, and termination of grounds for such control;

**3.2.7.** about decision to reorganize or liquidate adopted by an organization controlling the Bank, organization controlled by the Bank, which has substantial significance for the Bank, or by a person, who granted security under Bank's bonds;

**3.2.8.** about introduction of records to the Uniform State Register of Legal Entities, as connected with reorganization, cessation or liquidation of an organization controlling the

Bank, organization controlled by the Bank, which has substantial significance for the Bank, or of a person, who granted security under Bank's bonds;

**3.2.9.** about insolvency (bankruptcy) indicators, as stipulated by insolvency (bankruptcy) laws of the Russian Federation, became apparent in the Bank, a person controlling it, an organization controlled by the Bank, which has substantial significance for the Bank;

**3.2.10.** about acceptance by an arbitrazh court of the bankruptcy petition regarding recognition as bankrupt of the Bank, a person controlling it, or an organization controlled by the Bank, which has substantial significance for the Bank, or a person, who granted security under Bank's bonds, and about award adopted by an arbitrazh court to recognize the said persons as bankrupts, initiate a bankruptcy procedure in relation to one of them, termination of bankruptcy procedures in relation to them;

**3.2.11.** about a claim submitted against the Bank, an organization controlling it, an organization controlled by it, which has substantial significance for the Bank, or a person, who granted security under Bank's bonds, which amount totals 10 and more percent of book value of assets of the said persons as of the end of the reporting period (quarter, year) followed by the claim, in relation to which the period for submission of accounting (financial) statements has expired, or any other claim, which satisfaction can, at the Bank's absolute discretion, significantly affect Bank's financial and economic standing or the same of the said persons;

**3.2.12.** about a date, as of which the register of holders of Bank's Securities is made for purposes of execution of rights vested in such securities;

**3.2.13.** about stages of issue of Bank's Securities;

**3.2.14.** about suspension and resuming of issue of Bank's Securities;

**3.2.15.** about the issue (additional issue) of Bank's Securities recognized invalid;

**3.2.16.** about redemption of Bank's Securities;

**3.2.17.** about income accrued and/or paid under Bank's Securities;

**3.2.18.** about the agreement concluded between the Bank and a Russian Trade Organizer at the securities market relating to inclusion of Bank's Securities to the list of securities admitted to the listing at securities market by a Russian Trade Organizer, and the agreement with a Russian stock exchange relating to inclusion of Bank's Securities to the listing at a Russian stock exchange;

**3.2.19.** about inclusion of Bank's Securities to the list of securities admitted to listing at securities market by a Russian Trade Organizer or exclusion of the same from the said list, and their admission to the listing at a Russian stock exchange or exclusion from the same;

**3.2.20.** about the agreement concluded by the Bank regarding inclusion of Bank's Securities or securities of any foreign issuer, which certify rights in relation to Bank's Securities, to the list of securities admitted to listing at an organized (regulated) financial market, and the agreement with a foreign stock exchange regarding listing of such securities at a foreign stock exchange;

**3.2.21.** about inclusion of Bank's Securities or securities of any foreign issuer, which certify rights in relation to Bank's Securities, to the list of securities admitted to listing at an organized (regulated) financial market, and exclusion of such securities from the said list, and inclusion of such securities to listing at a foreign stock exchange and exclusion of the same from the said list;

**3.2.22.** about the agreement concluded by the Bank regarding maintenance (stabilization) prices for Bank's Securities, and termination of such agreement;

**3.2.23.** about the application filed by the Bank for permission of the Federal Executive Authority for Securities Market to place and/or organize circulation of Bank's Securities outside the Russian Federation, and about receipt by the Bank of the said permission;

**3.2.24.** about failure to perform Bank's obligations to holders of Bank's Securities;

**3.2.25.** about acquisition or loss by a person of a right to directly or indirectly (through its controlled persons) individually or jointly with others acting under a trust management contract and any/or other contract made with such persons relating to execution of rights certified by Bank's shares to dispose of a certain number of votes vested in voting shares (ownership interest) constituting the Bank's charter capital, provided that the said number of votes constitute 5 percent or became more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes vested in voting shares constituting Bank's charter capital;

**3.2.26.** about receipt by the Bank of a voluntary, including competing, or mandatory offer, as stipulated by chapter XI. 1 of the Federal Law No. 208-FZ, to purchase Bank's Securities, and about changes made to such offers;

**3.2.27.** about receipt by the Bank of a notice of right, as stipulated by chapter XI. 1 of the Federal Law No. 208-FZ, to demand repurchase of Bank's Securities, or notice of demand to repurchase Bank's Securities;

**3.2.28.** about disclosure or presentation by the Bank of quarterly reports, as stipulated by article 30 of the Federal Law No. 39-FZ;

**3.2.29.** about disclosure or presentation by the Bank of intermediate (quarterly) or annual consolidated accounting (consolidated financial) statements, including prepared according to international financial reporting standards and other foreign financial reporting standards, and about presentation of auditor's opinion made with respect to such statements;

**3.2.30.** about any errors identified in disclosed or presented accounting (financial) statements of the Bank;

**3.2.31.** about a deal made by the Bank or a person, who granted a security under Bank's bonds, which size constitutes 10 or more percent of book value of assets of the Bank or of the said person as of the end of the reporting period (quarter, year) followed by the deal, in relation to which the period for submission of accounting (financial) statements has expired;

**3.2.32.** about a deal made by an organization controlling the Bank or controlled by the Bank, which has substantial significance for the Bank, which deal is recognized as a major deal pursuant to laws of the Russian Federation;

**3.2.33.** about an interested party deal made by the Bank, and which approval by the Bank's authorized management body is required according to laws of the Russian Federation, where amount of such deal is 2 or more percent of the book value of Bank's assets as of the end of the reporting period (quarter, year) followed by approval of the deal by the Bank's authorized management body, and where such deal has not been approved by the Bank's authorized management body before, - as of the end of the reporting period (quarter, year) followed by conclusion by the Bank of such deal, in relation to which the period for submission of accounting (financial) statements has expired;

**3.2.34.** about change in the composition and/or size of collateral under Bank's bonds with collateral, and where change has occurred in the composition and/or size of the collateral under Bank's bonds with mortgage security – details of such changes, if resulted from replacement of any claim secured by mortgage, which constitutes mortgage coverage of bonds, or replacement of other property constituting mortgage coverage of bonds, which value (monetary value) is 10 or more percent of the mortgage coverage of bonds;

**3.2.35.** about changes in value of assets of a person, who granted security under Bank's bonds, which constitute 10 or more percent, or about any other change in financial and economic standing of the said person, which according to the Bank is significant;

**3.2.36.** about acquisition or loss by the Bank of a right to directly or indirectly (through its controlled persons) individually or jointly with others acting under a trust

management contract and/or simple partnership agreement, and/or trust agreement, and/or shareholders' agreement, and/or any other agreement made with such persons relating to execution of rights certified by shares (ownership interest) of an organization, which issue-grade securities are included in the list of securities admitted to listing at securities market by the Trade Organizer, or which value exceeds RUB 60 mln., to dispose of a certain number of votes vested in voting shares (ownership interest) constituting the Bank's charter capital, provided that the said number of votes constitute 5 percent or became more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes vested in voting shares (ownership interest) constituting charter capital of such organization;

**3.2.37.** about the agreement concluded by the Bank, a person controlling or controlled by it, which stipulates for the obligation to purchase Bank's Securities;

**3.2.38.** about receipt, suspension, resuming, re-issue, revocation (cancellation) and or any other termination by any reason of the Bank's permission (license) to certain activity, which has significant financial and economic significance for the Bank;

**3.2.39.** about expiry of powers of Bank's President and/or of members of the Bank's Board;

**3.2.40.** about change in the ownership interest in the charter capital of the Bank and organizations controlled by it, which has considerable significance for the Bank,:

- of persons being members of the Bank's Board of Directors, members of the Bank's Board, and of a person holding the office of Bank's President;
- of persons being members of the Board of Directors, members of the collegial executive body of the management company, and of a person holding office (exercising functions) of the sole executive body of the management company, where powers of the Bank's sole executive body were transferred to the management company;

**3.2.41.** about acquisition and/or termination of a right by holders of Bank's bonds to accelerate redemption by the Bank of Bank's bonds held by them;

**3.2.42.** about rating given to Bank's Securities and/or the Bank, or change in rating by a rating agency based on the agreement with the Bank;

**3.2.43.** about engagement or replacement of intermediaries, which service the Bank in relation to performance by the Bank of its obligations under bonds or other Bank's Securities, with specification of names, locations and amount of remuneration for such intermediary services, and about change of such details;

**3.2.44.** about a dispute related to establishment of the Bank, its management or participation in the Bank, including about initiation by an arbitrazh court of proceedings in the case and approval of a claim (statement of claim) for initiation of proceedings, about abandonment of claim, admission of claim, conclusion of amicable agreement, adoption of judicial act, by which proceedings in a first instance arbitrazh court are ended;

**3.2.45.** about claims submitted against a person, who granted a security under Bank's bonds, which related to performance of obligations under such bonds;

**3.2.46.** about placement of bonds and other financial instruments outside the Russian Federation, which certify debt obligations to be discharged at the Bank's expense;

**3.2.47.** about decision adopted by the Federal Executive Authority for Securities Market to release the Bank from its obligation to disclose information;

**3.2.48.** about acquisition (alienation) of Bank's voting shares or securities of a foreign issuer, which certify rights in relation to Bank's voting shares, by the Bank and/or organizations controlled by the Bank, other than controlled organizations, which act as brokers and/or trust managers, and made a deal on their behalf, but at the expense of a client other than the Bank or an organization controlled by the Bank;

**3.2.49.** which is sent or presented by the Bank to a respective body (respective organization) of a foreign state, foreign stock exchange and/or other organizations pursuant to the foreign law for purposes of disclosure or presentation to foreign investors in connection with placement or circulation of Bank's Securities outside the Russian Federation, including through acquisition of foreign issuer's securities to be placed (placed) according to the foreign law;

**3.2.50.** which constitutes accounting (financial) statements of the Bank, including consolidated accounting (consolidated financial) statements;

**3.2.51.** which constitutes terms of placement of Bank's securities, as determined by the decision to make an issue (additional issue) of Bank's Securities approved by the Bank's Board of Directors (Bank's General Meeting of shareholders) in case of:

- placement of Bank's Securities for trades held at securities market by the Trade Organizer;
- placement of additional Bank's Securities, provided that Bank's Securities of an issue, in relation to which the Bank's securities to be placed constitute an additional issue, are admitted to be listed at the securities market by the Trade Organizer or in relation to which an application for their admission to listing at the securities market has been submitted to the Trade Organizer;

**3.2.52.** contained in the report of issued Bank's Securities, as approved by Bank's President, in case of:

- placement of Bank's Securities for trades held at securities market by the Trade Organizer;
- placement of additional securities, provided that securities of an issue, in relation to which the securities to be placed constitute an additional issue, are admitted to be listed at the securities market by the Trade Organizer or in relation to which an application for their admission to listing at the securities market has been submitted to the Trade Organizer;

**3.2.53.** contained in the Prospectus of Bank's Securities, other than information, which has been earlier disclosed or provided pursuant to securities laws of the Russian Federation;

**3.2.54.** contained in quarterly reports, other than information, which has been earlier disclosed or provided pursuant to securities laws of the Russian Federation.

**3.2.55.** contained in issuer's annual reports, other than information, which has been earlier disclosed or provided pursuant to securities laws of the Russian Federation.

**3.3.** Apart from the said information, the Insider Information of the Bank, which acts as an issuer, may include any other information, which distribution or presentation, according to the Bank, can significantly affect the price for Bank's Securities admitted to listing at securities market by the Trade Organizer, or in relation to which an application for their admission to listing at securities market has been submitted to the Trade Organizer.

**3.4.** The Insider Information of the Bank acting as a broker and/or trust manager, which for the benefit of clients makes Transactions with financial instruments, includes the following information received from clients:

**3.4.1.** information contained in clients' instructions to be executed by a broker for acquisition (purchase) and/or sales of securities, if:

- the number of securities of one issuer, which provide their holders with the same scope of rights indicated in such instructions, constitute or exceed 0.2 percent of the total number of placed (circulating) securities with the same scope of rights of the same issuer;

- if market value of securities of one issuer, which provide their holders with the same scope of rights specified in such instructions, constitute or exceed RUB 100 mln;
- if a client is the insider of issuer of such securities;
- in other cases, where, according to the Bank, execution of such instructions can significantly affect the price for such securities;

**3.4.2.** information contained in clients' instructions to be executed by brokers for conclusion of agreements constituting derivative financial instruments;

**3.4.3.** information constituting material terms and conditions of trust management agreements related with conclusion of deals with securities and/or conclusion of agreements constituting derivative financial instruments, if:

- the number of securities of one issuer, which provide their holders with the same scope of rights and are in trust management, constitute or exceed 0.2 percent of the total number of placed (circulating) securities with the same scope of rights of the same issuer;
- if money and/or market value of securities of one issuer, which provide their holders with the same scope of rights and are in trust management, constitute or exceed RUB 100 mln;
- if trustor is the insider of issuer of securities transferred into trust management, or for investment into which securities money transferred into trust management will be appropriated for;
- in other cases, where, according to the Bank, trust management according to the given terms and conditions may considerably affect the price for securities;

**3.5.** The Insider Information of the Bank acting as an exchange intermediary includes the information received from clients and contained in clients' instructions to be executed and relating to conclusion of agreements constituting derivative financial instruments, which underlying asset is Commodities.

**3.6.** The Insider Information of the Bank acting as a credit organization, which for the benefit of clients makes Transactions with foreign currency at foreign exchange, includes information received from clients and contained in instructions to be executed for acquisition (purchase) or sale of foreign currency at stock exchange, if:

- market value of foreign currency, as specified in such instructions, is equal to or exceeds RUB 100 mln.;
- in other cases, where, according to the Bank, execution of such instructions may significantly affect the price for securities.

**3.7.** The Insider Information of the Issuer, to which the Bank has access pursuant to civil law contracts made with the Issuer, where the Bank deals with organization of securities issue in financial markets, acts as a payment agent or otherwise, includes the information:

- specified in **clause 3.2** of this agreement in relation to the Issuer;
- other information, which distribution or presentation, according to the Bank and legal regulations of the Russian Federal Securities Market Committee, may significantly affect the price of issue-grade securities of this Issuer and/or derivative financial instruments, which underlying asset is securities of this Issuer admitted to listing by the Trade Organizer, or in relation to which an application for their admission to listing has been submitted to the Trade Organizer;

**3.8. The Insider Information of legal entities:**

- Management Company;
- Dominating Economic Entity;
- securities trader and other persons, who for the benefit of clients makes transactions with financial instruments, foreign currency and/or Commodities,

to which the Bank has access pursuant to civil law contracts made with respective persons, includes information contained in instructions submitted to the Bank for performance of agreements made by the said persons with the Bank, and/or any other information, which distribution or presentation, according to the Bank and pursuant to legal regulations of the Russian Federal Securities Market Committee, can significantly affect prices for financial instruments, foreign currency and/or Commodities admitted to listing by the Trade Organizer, or in relation to which an application for their admission to listing has been submitted to the Trade Organizer.

**3.9.** The information specified in *clauses 3.2.-3.8.* hereof is also referred to the Insider Information where the said information relates not only to any occurred, but also any future, planned and expected events and actions.

**3.10. The Insider Information does not include:**

- information (including information specified in *clauses 3.2-3.9* hereof), which became publicly available, including as a result of its distribution;
- researches, forecasts and evaluations relating to financial instruments, foreign currency and/or Commodities, as made on the basis of publicly available information, and recommendations, and/or offers for Transactions with financial instruments, foreign currency and/or Commodities.

**4. INSIDERS**

**4.1.** The Bank's Insiders include the following persons:

**4.1.1.** members of the Board of Directors, Board of the Bank, Auditing Committee and President of the Bank;

**4.1.2.** persons, who own at least 25 percent of votes in the Bank's higher management body and persons, who due to their holding of shares (ownership interest) in the Bank's charter capital, have access to Insider Information pursuant to federal laws of the Russian Federation or Bank's constitutive documents;

**4.1.3.** Bank's shareholders, who have access to Bank's accounting records;

**4.1.4.** persons having access to information about sending of voluntary, mandatory or competing offer to acquire shares according to laws of the Russian Federation concerning joint-stock companies, including persons, who submitted to a joint-stock company a voluntary or competing offers, a credit organization, which issued bank guarantee, valuer (legal entities, with whom valuers made employment contracts);

**4.1.5.** persons having access to the Insider Information pursuant to agreements made with the Bank, including auditors (audit companies), valuers (legal entities, with whom valuers made employment contracts), securities traders, credit organizations, insurance organizations;

**4.1.6.** individuals having access to the Insider Information pursuant to employment and/or civil law contracts made between the Bank and such persons.

## 5. INSIDERS LIST MAINTENANCE PROCEDURE

5.1. The Bank shall keep the list of Insiders.

5.2. The Bank shall notify a person included in the list of Bank's Insiders or excluded from the same within 1 business day from inclusion of such persons to the list or exclusion of such person therefrom, respectively.

5.3. The notice of a person included in the list of Bank's Insiders or excluded therefrom shall be given by the Bank directly to a person included in the list of Bank's Insiders or sent to address of a said person, as known to the Bank, by such means, which enable to confirm the receipt of such notice by such person, according to the form given in *Annex 12.1* hereto. The notice containing more than one page shall be bound, and pages in the notice be numbered.

5.4. Should any Bank's details change, the Bank shall inform all persons included in the list of Bank's Insiders about such changes within 5 (Five) business days following such changes or within 5 business days following the date, when the Bank became aware or should have become aware of such changes.

5.5. If a notice given by the Bank to the known address of a person included in the list of Bank's Insiders has not been received by the said person due to circumstances beyond control of the Bank, the Bank should give a notice of such fact to the Federal Executive Authority for Securities Market within 5 business days following the date, when the Bank became aware of the respective fact.

5.6. The Bank keeps track of all notices given according to this document. Full information about given notices shall be kept by the Bank at least within five years following the exclusion of a person from the list of Bank's Insiders.

5.7. The Bank shall provide the list of Insiders to all Trade Organizers through which Transactions with financial instruments and foreign currency, and/or Commodities are made, to the Insider Information about which the Bank has access.

5.8. When providing the list of Bank's Insiders, the Bank shall specify financial instruments, foreign currency and/or Commodities, prices for which can be significantly affected by distribution or provision of information included in the list of Bank's Insider Information and Bank's contact information.

5.9. In addition to the list of Insiders, the Bank shall also provide Trade Organizers with consents of individuals included in the list of Bank's Insiders to processing of their personal data (copies of written consents certified by Bank's authorized body) according to the form given in *Annex 12.2*. hereto.

5.10. The Bank processes personal data of individuals acting as Insiders, where so provided for by laws of the Russian Federation or pursuant to consents received from individuals acting as Insiders to such processing.

5.11. Should the list of Insiders be amended, the Bank will furnish respective Trade Organizers with changes made to the list of Insiders and new version of the list of Insiders, as

amended. In such case, written consents of individuals included in the list of Bank's Insiders to processing of personal data shall be given only with respect to persons included again to the list of Insiders.

**5.12.** The Bank shall provide the list of Insiders (changes to the list of Insiders) to Trade Organizers not later than the beginning of the trade day following the date of the list of Bank's Insiders (date of changes to the list of Insiders).

**5.13.** The lists of Insiders shall be submitted by the Bank to the Federal Executive Authority for Securities Market by request.

**5.14.** Maintenance of the list of Insiders, notification of persons about their inclusion to the list of Insiders and their exclusion from the said list, notification of Bank's Insiders about changes in Bank's details, presentation of the list of Bank's Insiders to Trade Organizers and the Federal Executive Authority for Securities Market is the responsibility of Bank's Financial Markets Compliance Control Service.

## **6. MEASURES TO PREVENT, IDENTIFY AND SUPPRESS UNAUTHORIZED USE OF INSIDER INFORMATION**

**6.1.** Pursuant to the Federal Law No. 224-FZ, the Insider Information may not be used in the following cases:

- for Transactions with financial instruments, foreign currency and/or Commodities, which are covered by Insider Information, to be made at one's own expense or at the expense of any third party, unless transactions are made with a purpose to perform the obligation relating to purchase or sale of financial instruments, foreign currency and/or Commodities, which has become mature, provided such obligation occurred as a result of a Transaction had been made before a person became aware of Insider Information;
- for transfer of such information to any person other than to a person included in the list of Insiders in connection with performance of obligations stipulated by laws of the Russian Federation or of employment duties, or a contract;
- for giving recommendations to third parties, obliging or compelling such persons otherwise to acquire or sale financial instruments, foreign currency and/or Commodities.

**6.2.** Civil law contracts made between the Bank and legal entities in order to authorize such legal entities to access Insider Information shall include the following provisions:

- obligation of the said legal entities and their employees to comply with **clause 6.1.** hereof;
- condition of nondisclosure by the said legal entity and its employees of Insider Information, which became known to them in course or performance of respective civil law contracts made with the Bank, and the obligation not to use Insider Information for making any profit;
- obligation to comply with **clauses 6.7, 6.8, 6.10.** hereof.

**6.3.** Employment contracts and/or civil law contracts made between the Bank and individuals, who when performing such contracts have access to Insider Information, shall include the following provisions:

- obligation of the said individuals to comply with **clause 6.1.** hereof;
- condition of nondisclosure by the said individual of Insider Information, which became known to it in course of performance of respective agreements made with the Bank, and the obligation not to use the obtained Insider Information for making any profit;
- Insiders' consent to processing of their personal data, as required by the Bank to control compliance with this document;
- obligation to comply with **clauses 6.7., 6.8., 6.10.** hereof.

**6.4.** Compliance with **clauses 6.2.-6.3.** hereof shall be the responsibility of Heads of Bank's structural units, who participate in conclusion of respective civil law contracts.

**6.5.** Heads of Bank's structural units, who participate in civil law contracts, based on which a party to the contract becomes authorized to access Insider information, shall within one business day following signing of respective agreements submit a notice to Head of Financial Markets Compliance Control Service containing the following details:

**6.5.1.** in respect of a legal entity, which acts as a party to the contract:

- full company name;
- INN, OGRN codes;
- subject-matter of contract, contract details (contract number and date);
- mailing address for correspondence.

**6.5.2.** in respect of an individual, which acts as a party to the contract:

- full name;
- date and place of birth;
- passport data;
- subject-matter of contract, contract details (contract number and date);
- mailing address for correspondence.

**6.6.** Heads of Bank's structural units shall within 1 business day following a Transaction with financial instruments, foreign currency, which are covered by the Insider Information, give a notice to Head of the Financial Markets Compliance Control Service containing the details set out in **Annex 12.3** hereto.

**6.7.** Persons included to the list of Bank's Insiders shall pursuant to legal regulations of the Russian Federal Securities Market Committee inform the Bank and the Federal Executive Authority for Securities Market about Transactions made by them with financial instruments, foreign currency and/or Commodities, which are covered by the Insider Information, to which they have access.

**6.8.** Obligations of persons set out in *clause 6.7.* hereof extend to any Transactions, in which Insider acts as a party, beneficiary, intermediary or representative. The said persons shall give notices within 10 business days following the date of a respective Transaction with financial instrument, foreign currency and/or Commodities according to the form set out in *Annex 12.3.* hereto.

**6.9.** Persons specified in *clauses 4.1.1-4.1.3* hereof shall inform the Bank by giving notices stipulated by this document to Bank's Corporate Secretary within 10 business days following the date of a Transaction. Such notices shall be given by means, which can ensure confirmation of receipt thereof.

Persons being members of the Bank's Board of Directors, members of the Bank's Board, and a person holding the office of Bank's President, when making Transactions with Bank's shares and depositary receipts for Bank's shares, as a result of which the size of ownership interest in the charter capital of the Bank and organizations controlled by it, which have considerable significance for the Bank, has changed, shall inform the Bank by giving notices, as stipulated by this document, to Bank's Corporate Secretary within 5 business days following the date of a respective Transaction.

Bank's Corporate Secretary shall deliver any received notices to Head of the Financial Markets Compliance Control Service within 5 business days following receipt thereof.

**6.10.** Persons specified in *clauses 4.1.4-4.1.6* hereof (other than members of the Board of Directors, Board, Auditing Committee and Bank's President, who inform Bank's Corporate Secretary) shall inform the Bank by giving notices stipulated hereby and addressed to Head of the Financial Markets Compliance Control Service within 10 business days following the date of a respective Transaction. Such notices shall be given by means, which can ensure confirmation of receipt thereof.

**6.11.** Notices of inclusion of the Bank to the list of insiders acting as legal entities to whose Insider Information the Bank has access according to clause 3.1.5. hereof shall be addressed to Head of the Financial Markets Compliance Control Service with acknowledgment of receipt thereof.

**6.12.** The Bank within 10 business days following the date of a Transaction made at one's own expense or for one's own behalf with a financial instrument, foreign currency, which are covered by Insider Information of persons specified in *clause 3.1.5.* hereof, shall inform persons and the Federal Executive Authority for Securities Market about a made Transaction according to the form set out in *Annex 12.3.* hereto. The compliance with this clause shall be the responsibility of the Financial Markets Compliance Control Service.

**6.13.** Notices of a Transaction made by the Bank on its behalf and at its expense with a financial instrument, foreign currency shall be given to respective persons set out in *clause 3.1.5.* hereof. Such notices shall be given by means, which can ensure confirmation of receipt thereof, including by courier, mail with acknowledgment of receipt, electronic document signed with electronic digital signature.

**6.14.** Notices of a Transaction made by the Bank on its behalf and at its expense with a financial instrument, foreign currency shall be given to the Federal Executive Authority of Securities Market by one of the following means:

- by delivery of a notice to headquarters of the Federal Executive Authority of Securities Market for its further dispatch by courier;
- by mail with acknowledgment of receipt;
- by sending an electronic document signed by electronic digital signature;
- by giving a notice via web-interface of Personal Account accessed to by an information exchange participant, and link to which is available at the website of the federal executive authority in financial markets ([www.ffms.ru](http://www.ffms.ru)), section “Electronic Document Workflow”.

**6.15.** Notice of a Transaction made by the Bank on its behalf and at its expense with a financial instrument, foreign currency, where given in hard copy, shall be signed, sealed, numbered and bound, if contains more than one page.

## 7. PROCEDURE AND TIME FOR DISCLOSURE OF INSIDER INFORMATION

**7.1.** Insider Information of the Bank acting as an issuer is subject to disclosure by the Bank in the manner and within the period stipulated by legal regulations of the Russian Federal Securities Market Committee governing the disclosure of information by issuer of issue-grade securities, this document or other legal regulations of the Russian Federal Securities Market Committee.

According to *clause 3.10.* hereof, information shall cease to be considered as Insider Information upon its disclosure to public.

**7.2.** Where according to legal regulations of the Federal Executive Authority for Securities Market notices of significant events of issuers of issue-grade securities are subject to publication at an information resource updatable on a real-time bases and provided by an information agency (hereinafter “Newsfeed”), the publication of Bank’s Insider Information shall be made in the newsfeed of at least one information agency authorized by the Federal Executive Authority of Securities Market to distribute information disclosed at securities market (hereinafter the “Information Distributor”) until 10.00 a.m., Moscow Time, of a last day during which such publication shall be made.

**7.3.** When publishing information in Internet, the Bank shall ensure free and easy access to such information and by request of interested parties informs them of URL, where information is published.

**7.4.** Notice of Insider Information of the Bank acting as an issuer shall be published within the following periods following the date of a respective fact (event, action) or date, when the Bank became aware or should have become aware of its occurrence:

- in newsfeed – within 1 day;
- at [www.psbank.ru](http://www.psbank.ru) – within 2 days.

**7.5.** If Insider Information of the Bank acting as an issuer is contained in Bank’s documents, disclosure of such Insider Information shall be by granting of access thereto to any interested persons regardless of purpose, for which it is to be obtained.

**7.6.** Access to Bank’s Insider Information specified in *clause 7.5.* hereof is ensured by:

- publishing of document containing Bank's Insider Information at [www.psbank.ru](http://www.psbank.ru) within 2 days following the approval of a respective document by Bank's President or within 2 days following the date of minutes of meeting of the Bank's Board of Directors, Bank's Board;
- publishing in the newsfeed of a notice regarding the procedure of access to Insider Information contained in Bank's document – within 1 day following the publication of the document containing Bank's Insider Information at [www.psbank.ru](http://www.psbank.ru);
- presentation of a copy of the document containing Bank's Insider Information by request of an interested person, which is authorized to receive the same, within 7 days following the receipt (submission) of claim for payment not exceeding costs of a copy.

**7.7.** Access to Bank's Insider Information contained in the decision on issue (additional issue) of Bank's Securities, Prospectus of Bank's Securities, report of issue (additional issue) of Bank's Securities, as approved by Bank's authorized body, is ensured by means and within the period specified in *clause 7.6.* hereof, from the date following the publication of information about state registration of issue (additional issue) of Bank's Securities, registration of prospectus of Bank's Securities, state registration of report of issue (additional issue) of Bank's Securities on the page of the registration body in Internet, or following receipt by the Bank of a written notice from the registration body of such state registration by mail, fax, electronic means, delivery against signature, depending on which of the said dates become earlier.

**7.8.** Unless otherwise is stipulated by legal regulations of the Federal Executive Authority for Securities Market, notices of Insider Information of the Bank acting as an issuer (texts of documents containing Insider Information of the Bank acting as an issuer) shall be available at [www.psbank.ru](http://www.psbank.ru) upon expiry of the date established for publication thereof in Internet, and if the same are published in Internet after expiry of such period – from the date of their publication in Internet and until expiry of at least 6 months following their publication in Internet.

**7.9.** The following **shall not be subject to disclosure** according to this document:

**7.9.1.** Bank's Insider Information, when the Bank for the benefit of clients makes Transactions with financial instruments, which is contained in:

- clients' instructions to be executed for acquisition (purchase) or sale of securities;
- clients' instructions to be executed for conclusion of contracts constituting derivative financial instruments;
- trust agreements relating to management of securities and/or funds intended for transactions with securities and/or conclusion of agreements constituting derivative financial instruments;

**7.9.2.** Insider Information of the Bank acting as an exchange intermediary, which is contained in clients' instructions to be executed for conclusion of agreements constituting derivative financial instruments, which underlying asset is Commodities;

**7.9.3.** Insider Information of the Bank acting as a credit organization for the benefit of clients and making Transactions with foreign currency at currency exchange, which Insider Information is contained in clients instruction to be executed for acquisition (purchase) or sale of foreign currency at stock exchange;

**7.9.4. Insider Information of legal entities:**

- Issuer;
- Management Company;
- Dominating Economic Entity;
- securities trader and other persons, who for the benefit of clients make Transactions with financial instruments, foreign currency and/or Commodities, to which the Bank has access pursuant to civil law contracts made with respective legal entities, includes the information contained in instructions submitted to the Bank to perform agreements made between the said persons and the Bank, and/or any other information, which distribution or presentation, according to the Bank and pursuant to legal regulations of the Russian Federal Securities Market Committee, can significantly affect the prices for financial instruments, foreign currency and/or Commodities admitted to listing by the Trade Organizer, or in relation to which an application for their listing has been submitted to the Trade Organizer.

**8. INSIDER INFORMATION PROTECTION MEASURES**

**8.1.** Insiders shall keep confidentiality of Insider Information obtained by them.

**8.2.** The confidentiality obligations do also extend to Insiders, who terminated to perform their employment or any other service duties – until the information received by them is no longer Insider Information.

**8.3.** Insiders may disclose Insider Information only to the extent stipulated by laws of the Russian Federation.

**8.4.** The Bank may take measures to protect Insider Information from any unauthorized use, which are intended to:

- establish control over Insiders with respect to their use and disposal of Insider Information;
- ensure compliance with the procedure of use and disposal of Insider Information, including by exclusion of it from unauthorized use;
- raise credibility of the Bank for investors and counteragents.

**8.5.** The measures intended to protect Insider Information, which may be established by the Bank on the basis of its internal documents, include, inter alia:

- restricted access to certain premises occupied by the Bank;
- keeping track of persons possessing Insider Information;
- placing labels “Confidential” or “For official use” on tangible media (documents) with Insider Information (documents marked as “Confidential” or “For official use” may be presented only to those persons, which are authorized to access such information);
- granting of access or restricting access to Insider Information for Bank’s employees pursuant to employment contracts and for counteragents pursuant to civil law contracts;
- causing employees and counteragents of the Bank to assume confidentiality obligations in written relating to non-disclosure of Insider Information and other confidential information;

- permitting to access to Insider Information and other confidential information in restricted areas only;
- timely destroying of all documents, which may contain Insider Information and which are not subject to keeping;
- establishment of procedures intended to protect workplaces and document storage locations from free access and monitoring;
- use of IT protection systems preventing data loss and unauthorized access to Insider Information, including via communication channels;
- prohibition to discuss Insider Information in locations, where it can be heard by any third parties, e.g. in lifts, WC, lobbies, restaurants, plans or taxi;
- other measures intended to restrict access to Insider Information.

## 9. INSIDER INFORMATION USE PROCEDURE

9.1. Use of Insider Information is lawful, when Insider Information is used to support economic, financial and other activities of the Bank according to laws of the Russian Federation, legal regulations of the Bank of Russia and the Federal Executive Authority for Securities Market, this document and other Bank's internal documents.

9.2. Unlawful use of Insider Information means any use of Insider Information for personal benefits of Insiders and third parties, inter alia, for:

- Transactions with financial instruments, foreign currency and/or Commodities based on Insider Information;
- recommendations to third parties regarding purchase, sale or refusal from purchase, sale of financial instruments, foreign currency and/or Commodities;
- transfer of Insider Information to third parties for a consideration or without consideration;
- publication or distribution of Insider Information by means not stipulated by this document.

9.3. For purposes of protection of Insider Information, the Bank shall:

- familiarize an employee with this document, who needs access to Insider Information for performance of its employment duties;
- familiarize an employee with the mode of use of Insider Information and liability for its breach, as established by the Bank;
- ensure conditions for an employee as necessary for its compliance with the mode of use of Insider Information, as established by the Bank.

9.4. Should the Bank have any grounds to expect that a Transaction made on behalf of the Bank, but at client's expense, or for and on behalf of clients, involves unlawful use of Insider Information, the Bank will inform the Federal Executive Authority of Securities Market of such fact.

## 10. LIABILITY FOR UNAUTHORIZED DISPOSITION AND USE OF INSIDER INFORMATION

10.1. Bank's employees, who are in labor relations with the Bank and breached this document, may be subject to penalty measures, including dismissal, and decision of such

penalty is to be adopted in the manner stipulated by applicable laws of the Russian Federation and Bank's internal document.

**10.2.** Persons, who breached this document, shall bear liability to the Bank for loss incurred to the Bank by their faulty actions (omissions). In particular, the Bank or shareholder(s) holding in aggregate at least 1 percent of placed Bank's shares may submit a claim to the court against members of Bank's management bodies for compensation of loss incurred to the Bank.

**10.3.** Third parties, who incurred loss (actual damage and loss of profit) as a result of unlawful disposition and use of Insider Information, may claim in court for compensation of such loss by person(s), who breached this document.

**10.4.** According to norms of the *Code of Administrative Offences of the Russian Federation and the Criminal Procedure Code of the Russian Federation*, persons, who breached this document, may be brought to administrative and criminal liability.

**10.5.** Insiders may be held liable for communication or transfer of Insider Information to a third party (hereinafter "Insider Information Addressee"). The liability for Transactions with financial instruments, foreign currency and/or Commodities made on the basis of Insider Information may, in addition to Insider, also extend to the Insider Information Address, who makes Transactions on the basis of unlawfully obtained Insider Information, unless Insider Information has been unlawfully used, where Insider Information Addressee was not aware and should not have been aware of such information being Insider Information.

**10.6.** Insider's obligations will be transferred to Insider Information Addressee. In addition, Insider Information Addressee will be liable for Transactions made on the basis of essential information, which is not publicly available and unlawfully disclosed to it by Insider. The Insider Information Addressee will bear similar liability for transfer of Insider Information to any person, who makes Transactions with financial instruments, foreign currency and/or Commodities on its basis, as Insider is liable for Transactions made by Insider Information Addressee based on Insider Information. In other words, Insider Information Addressee's liability for Transactions made on the basis of Insider Information shall be the same as Insider's liability.

## **11. COMPLIANCE WITH THIS DOCUMENT**

**11.1.** This document is applicable to all persons possessing Insider Information. The monitoring of compliance of this document is the responsibility of the Financial Markets Compliance Control Service.

**11.2.** Persons possessing Insider Information will independently decide on possibility to make Transactions with Bank's Securities and any other financial instruments, foreign currency, and/or Commodities, which are covered by Insider Information, to which they have access, which shall not release them from liability established by norms of legislative and other legal regulations governing the procedure of handling Insider Information for breach or abuse when making Transactions on the basis of Insider Information.

**11.3.** Since trading based on Insider Information obtained from the Bank discredits its reputation, the Bank reserves the right to report about all cases, as become known to it, relating to making of Transactions with financial instruments, foreign currency and/or Commodities based on Insider Information to the Federal Executive Authority for Securities Market and to submit a claim for damage to court.

**11.4.** If Insider doubts as to whether it will breach this document when making Transactions with Bank's Securities and financial instruments, foreign currency and/or Commodities, which are covered by Insider Information, to which Insider has access, it is advised to refuse to make such Transactions.

**11.5.** This document is to be approved by the Bank's Board of Directors.

**11.6.** The Bank's Board of Directors on as need basis will review this document and amend it, as necessary, in line with legislative and legal regulations governing the procedure of handling Insider Information.

## 12. ANNEXES

### 12.1. NOTICE OF INCLUSION OF PERSONS TO THE LIST OF INSIDERS / EXCLUSION OF PERSONS FROM THE LIST OF INSIDERS

#### NOTICE

#### of inclusion of persons to the list of insiders of OJSC Promsvyazbank (exclusion of persons from the list of insiders of OJSC Promsvyazbank)

No.	I. Bank's details	
1.1.	Full official name	
1.2.	INN	
1.3.	OGRN	
1.4.	Registered office	
1.5.	Other correspondence address	
1.6.	Telephone	
1.7.	Fax	
1.8.	E-mail	
No.	II. Details of person included in the list of Bank's insiders (excluded from the list of Bank's insiders)	
	For insider acting as legal entity	
2.1.	Full official name	
2.2.	INN	
2.3.	OGRN	
	For insider acting as individual	
2.1.	Full name	
2.2.	Date of birth	
2.3.	Place of birth	

No.	III. Ground for notice	
3.1.	Ground for notice (specify: “inclusion to the list of insiders” or “exclusion from the list of insiders”)	
3.2.	Date for inclusion to the list of insiders (exclusion from the list of insiders)	
3.3.	Ground for inclusion of a person to the list of insiders (exclusion from the list of insiders)	

Please, note that upon inclusion of a person to the list of Bank’s insiders, such person, as an insider, will become subject to limitations stipulated by **clause 6** of the Federal Law “Concerning Counteraction of Unlawful Use of Insider Information and Market Manipulation and Concerning Amendments to Certain Legislative Acts of the Russian Federation” dated 27 July 2010 No. 224-FZ (hereinafter the “Federal Law”), liability stipulated by **clause 7** of the Federal Law, and such person shall assume duties stipulated by **clause 10** of the Federal Law.

Bank’s authorized official

/Full name/

L.S.

**12.2. CONSENT OF INDIVIDUAL TO PERSONAL DATA PROCESSING****Request No. \_\_\_\_\_  
of individual included to the list of insiders of OJSC Promsvyazbank**

I, \_\_\_\_\_  
(Full name)  
details of identification document \_\_\_\_\_  
(name of document)  
series \_\_\_\_\_ number \_\_\_\_\_ issued on \_\_\_\_\_,  
by \_\_\_\_\_,  
(name of issuing authority)

registration address: \_\_\_\_\_,  
pursuant to the Federal Laws "Concerning Personal Data" dated 27.07.2006 No. 152-FZ, I hereby \_\_\_\_\_ (*specify "agree" or "disagree" with own hand*) to authorize OJSC Promsvyazbank, Smirnovskaya st., 10/22, Moscow, Russia, and persons, specified in Annex 1 hereto, to perform with all personal data specified by me in this Request any actions (operations), including collection, systematization, accumulation, storage, qualification (update, modification), use, distribution (including transfer), depersonalization, locking, destroying of personal data for purposes of compliance with the Federal Law "Concerning Counteraction of Unlawful Use of Insider Information and Market Manipulation and Concerning Amendments to Certain Legislative Acts of the Russian Federation" dated 27.10.2010 No. 224-FZ, through direct contracts with me using communication means, during the entire validity of this consent.

Personal data will be processed by OJSC Promsvyazbank and the persons specified in Annex 1 hereto. Personal data on hard and electronic media will be processed using computer-aided systems.

This \_\_\_\_\_ (*specify "consent" or "refusal" with own hand*) shall be valid for five years from the date of exclusion of me from the list of insiders of OJSC Promsvyazbank.

Upon expiry of this consent or revocation thereof, I authorize OJSC Promsvyazbank and the persons specified in Annex 1 hereto to destroy only those personal data, which further processing is not stipulated by laws of the Russian Federation.

\_\_\_\_\_ 20\_\_\_\_\_.

(signature)

**FOR OFFICIAL USE**

\_\_\_\_\_ (Full name of Promsvyazbank's employee)

\_\_\_\_\_ (signature)

\_\_\_\_\_ 20\_\_\_\_\_.

**Annex 1 to the Request No. \_\_\_\_\_ of individual included to the list of insiders of OJSC Promsvyazbank**

No.	Name	Registered office	Mailing address
1	Moscow Interbank Currency Exchange (ZAO)	B. Kislovsky per., 13, Moscow, 125009	B. Kislovsky per., 13, Moscow, 125009
2	St. Petersburg Currency Exchange (ZAO)	Sadovaya st., 12/23, St. Petersburg, 191011	Sadovaya st., 12/23, St. Petersburg, 191011
3	MOSCOW STOCK EXCHANGE (OAO)	Vsevoloda Vishnevskogo st., 4, Moscow, 127422	Vsevoloda Vishnevskogo st., 4, Moscow, 127422
4	MICEX Stock Exchange (ZAO)	B. Kislovsky per., 13, Moscow, 125009	B. Kislovsky per., 13, Moscow, 125009
5	RTS Stock Exchange (OAO)	Vozdvizhenka st., 4/7, bld. 1, Moscow, 125009	Vozdvizhenka st., 4/7, bld. 1, Moscow, 125009
6	St. Petersburg Stock Exchange (OAO)	Military Region, 15, 26 <sup>th</sup> line, St. Petersburg, 199026	Military Region, 15, 26 <sup>th</sup> line, St. Petersburg, 199026

\_\_\_\_\_ 20\_\_\_\_\_.

(signature)

**FOR OFFICIAL USE**

\_\_\_\_\_ (Full name of Promsvyazbank's employee)

\_\_\_\_\_ (signature)

\_\_\_\_\_ 20\_\_\_\_\_.

**12.3. NOTICE OF TRANSACTION MADE BY A PERSON INCLUDED TO THE LIST OF INSIDERS WITH A FINANCIAL INSTRUMENT, FOREIGN CURRENCY OR COMMODITY**

Ref. no. \_\_\_\_\_

**NOTICE  
of transaction made by insider with a financial instrument, foreign currency or commodity**

1. Full name of insider acting as individual/ Full official name of insider acting as legal entity	
2. Type and details of identification document of insider acting as individual/ INN, OGRN of insider acting as legal entity	
3. Registration address of insider acting as individual/ Registered office of insider acting as legal entity	
4. Full official name of person, in whose list of insiders insider is included	
5. Date of transaction	
6. Type of deal (transaction)	
7. Amount of deal (transaction)	
8. Place of deal (name of trade organizer or OTC market)	
9. Type, category, series of security (specify for deals with securities)	
10. Full official name of issuer of security (specify for deals with securities)	
11. State registration number of issuer of security (specify for deals with securities)	
12. Value of security (specify for all deals with securities other than REPO deals)	
13. Purchase price and sale price of security under REPO agreement (for REPO agreements)	
14. Number of securities (specify for deals with securities)	
15. Type of agreement constituting a derivative financial instrument (for deals with derivative financial instruments)	
16. Name (designation) of agreement constituting a derivative financial instrument, as accepted from trade organizer at securities market (specify for deals with derivative financial instruments)	
17. Price of agreement constituting a derivative financial instrument (size of option premium) (specify for deals with derivative financial instruments)	
18. Number of agreements constituting derivative financial instruments (specify for deals with derivative financial instruments)	

instruments)	
19. Strike price of agreement constituting a derivative financial instrument (specify for deals with derivative financial instruments)	
20. Type of currency (specify for currency transactions)	
21. Type of Commodity (specify for transactions with Commodity)	
22. Number of Commodity (specify for transactions with Commodity)	
23. Unit price for Commodity (specify for transactions with Commodity)	

\_\_\_\_\_20\_\_.

Full name of insider acting as individual/

Full official name of insider acting as legal entity

Insider's authorized person

\_\_\_\_\_ (Full name)

L.S.