APPROVED BY

the resolution of the Supervisory Board
Moscow Exchange
on October 11, 2023 (Minutes No. 11)

INFORMATION POLICY
of Public Joint-Stock Company
Moscow Exchange MICEX-RTS

Contents

1. General Provisions and Terms

1.1. This Information Policy of Public Joint-Stock Company Moscow Exchange MICEX-RTS (hereinafter, the “Policy”) is drawn in accordance with the current laws of the Russian Federation, the Corporate Governance Code recommended by the Bank of Russia, the Bank of Russia’s regulations, the Charter of the Moscow Exchange, Corporate Governance Code of the Moscow Exchange, and other internal regulations of the Moscow Exchange.

1.2. This Policy establishes and describes: the main purposes and principles of information disclosure by the Moscow Exchange as an issuer of securities, trade organiser and financial platform operator; groups of disclosed information, including a list of information that the Moscow Exchange may disclose voluntarily; the information disclosure procedures (including information channels for information disclosure and ways of disclosure); the procedures for communication of the Moscow Exchange with stakeholders, including the Moscow Exchange employees in charge of such communication; the procedure and time frames for providing access to disclosed information and documents; measures to control compliance with the Moscow Exchange’s information policy, information disclosure risk management efforts; other information disclosure matters.

1.3. The information disclosure procedure and the list of disclosed documents and information as set forth in this Policy may be amended depending on changes in the applicable laws, regulations and resolutions of the Bank of Russia Board of Directors. If, as a result of such changes, any provision/rule of the Policy is in conflict with the law, such provision/rule shall cease to be effective, and, until relevant changes are introduced to the Policy, Moscow Exchange shall be guided by the provisions of the law and/or regulations of the Bank of Russia.

1.4. Terms used in this Policy shall have the following meanings:

Moscow Exchange (Exchange) means Public Joint-Stock Company Moscow Exchange MICEX-RTS, the Exchange;

Stakeholders mean individuals and legal entities engaged in cooperation with the Exchange or interested in obtaining information about Exchange’s activities: shareholders and investors as well as financial analysts, employees, clients (service users), creditors, service providers, mass media, regulator and federal executive bodies;

Information means any information (messages, data) regardless of its presentation and/or disclosure;

Information subject to mandatory disclosure means information that must be disclosed as required by the laws of the Russian Federation, Bank of Russia regulatory documents and regulatory documents of the federal executive bodies;

Information disclosed on a voluntary basis means information, other than that provided by the laws, voluntarily disclosed at the discretion of the Exchange in accordance with the Policy;

Key executive officers mean the members of the Exchange’s collegial executive body

Moscow Exchange Group Companies, Moscow Exchange Group, or **Group** means the Moscow Exchange and legal entities controlled, directly or indirectly, by the Moscow Exchange;

Confidential information means electronic (digital) information processed by the Exchange’s information infrastructure and information on paper or in other form the access to which is restricted under the Russian Federation laws and the Exchange’s regulations. The

Exchange's confidential information includes commercial and official secrets and personal data as well as other secrets protected by law;

Information disclosure/ disclosure means making information available to the public, regardless of the purpose such information is obtained, in accordance with the procedure that ensures availability and receipt of disclosed information;

Disclosed information means information in respect of which the Moscow Exchange has performed disclosure procedures;

Regulator means the Bank of Russia that regulates, controls and supervises the financial markets.

1.5. Abbreviations used in this Policy:

IFRS: International Financial Reporting Standards.

2. Purposes and Objectives of Information Disclosure

2.1. The main purposes of disclosures made by the Moscow Exchange include:

- ensuring transparency of the Moscow Exchange for shareholders, investors and other stakeholders;
- ensuring effective communication between the Moscow Exchange, shareholders, investors and other stakeholders;
- ensuring that shareholders, investors and other stakeholders can, to the fullest extent possible, exercise their right to obtain information essential to making informed, balanced investment and management decisions;
- ensuring a uniform approach of the Moscow Exchange to information disclosure, disclosure procedures, communications with stakeholders, and delineation of powers with respect to information disclosure;
- enhancing corporate governance at the Moscow Exchange.

2.2. The main objectives of the Policy include:

- disclosure and provision of information in accordance with the laws of the Russian Federation and regulatory documents of the Regulator;
- definition of main principles and approaches to disclosure and provision of information;
- regulation of main processes of communication of the Moscow Exchange and its management bodies and officials with stakeholders;
- protection of data and information about the Moscow Exchange, the disclosure and/or use of which could harm the legitimate interests of the Moscow Exchange and its shareholders.

3. Main Principles of Information Disclosure and their Implementation

3.1. The Moscow Exchange shall disclose information in compliance with the following principles:

- regularity, consistency, timeliness of disclosure;
- availability, reliability, completeness, and comparability of disclosed information;
- neutrality of disclosed information;
- fair access and easy communication of disclosed information and documents to shareholders on their request;
- controllability of the information disclosure process;
- confidentiality.

3.2. The Moscow Exchange shall implement and adhere to the principles of regularity, consistency, promptness and timeliness of information disclosure through the use of the following approaches:

3.2.1. Persistent information disclosure process.

3.2.2. Commitment to disclose any information that could materially affect the price of securities of the Moscow Exchange and their evaluation by the Moscow Exchange.

3.2.3. Timely provision of information on the attitude of the Moscow Exchange to rumours or false information that form a distorted view as to the evaluation of the Moscow Exchange and the price of its securities, which exposes the interests of shareholders and investors to risk.

3.2.4. Establishment of internal procedures to ensure coordinated actions of relevant structural units and employees of the Moscow Exchange in preparation and disclosure of information.

3.3. The Moscow Exchange shall implement and adhere to the principles of reliability, completeness, comparability and neutrality of the disclosed information through the use of the following approaches:

3.3.1. The disclosed information should be clear and consistent, and the disclosed data should be comparable (so that a recipient could compare the performance of the Moscow Exchange during different periods of time and benchmark it against peers).

3.3.2. The disclosed information should be objective and well-balanced.

3.3.3. The disclosed information (including financial information) should be neutral, i.e. independent of any persons or groups, and the content and form of such information should not be intended to achieve certain results or consequences.

3.3.4. Both positive and negative information significant to shareholders and investors should be disclosed, even if such disclosure is not required by law.

3.3.5. The disclosed information should not be ambivalent or contradictory.

3.3.6. The disclosed information should not be false.

3.4. The Moscow Exchange shall implement and adhere to the principle of availability through the use of the following approaches:

3.4.1. Use of a variety of ways and means of information disclosure, especially electronic means, available and convenient for most of the stakeholders.

3.4.2. Ways of information dissemination should provide for free and easy access to the disclosed information by stakeholders.

3.4.3. Information disclosed on the website of the Moscow Exchange should be accessible free of charge and without any special procedures, including registration on website.

3.4.4. Information subject to mandatory disclosure in accordance with the laws of the Russian Federation should be in Russian; other languages are also allowable.

3.5. The Moscow Exchange shall implement and adhere to the principle of controllability of the disclosure process through the use of the following approaches:

3.5.1. The process and timing of disclosure, the structure and amount of information disclosed, methods, mechanisms and ways of disclosure should be under the constant supervision of the relevant officers of the Moscow Exchange and the Regulator.

3.6. The Moscow Exchange shall implement and adhere to the principle of confidentiality through the use of the following approach:

3.6.1. Maximum protection of confidential information constituting trade secrets and insider information, and prevention of misuse of such information.

4. Means of Communication for Information Disclosure Purposes

4.1. For information disclosure purposes, the Moscow Exchange shall use the following means of communication:

4.1.1. Written documents and materials prepared for both internal and external purposes, including press releases, brochures, magazines, informational materials, and publications in any mass media.

4.1.2. Oral communications, including, comments, interviews, press conferences, reports, and speeches at public events.

4.1.3. Audio-visual materials, including videos, corporate videos, speeches and interviews on television and radio programs, slides and other means of visual representation used at conferences, meetings or other events, both within and outside the Moscow Exchange.

4.1.4. Electronic materials, including e-mail, Internet, and corporate intranet.

4.1.5. Corporate ads on various media.

4.2. The Moscow Exchange may use, for the information disclosure purpose, any communication means other than those mentioned in Clause 4.1 above and/or use multiple communication means to disclose the same information.

5. Groups of Information, Ways and Forms of Information Disclosure/Provision

5.1. Information disclosed and/or provided by the Moscow Exchange is broken into three groups:

5.1.1. information subject to mandatory disclosure;

5.1.2. information disclosed on a voluntary basis;

5.1.3. information provided at request of stakeholders.

5.2. The Moscow Exchange shall disclose or provide information in the following ways:

- publication in a news line;
- posting on the corporate website of the Moscow Exchange at: http://moex.com/ in Russian and at: http://moex.com/en/ in English;
- posting on an Internet page provided by one of the news agencies, who are duly authorised to disclose the information in the securities market and markets other financial instruments are traded on;
- publication in print media;
- holding regular information sessions and other meetings with stakeholders, including those with the use of communication equipment;
- providing shareholders with access to information/documents and issue to them copies of relevant documents at their request in cases stipulated by the laws of the Russian Federation, the Bank of Russia's regulations and the Charter and internal regulations of the Moscow Exchange;
- other methods provided for by the laws of the Russian Federation, regulatory documents of the Bank of Russia, the Charter and internal regulations of the Moscow Exchange.

5.3. To disclose information, the Moscow Exchange may use ways and methods not listed in Clause 5.2 hereof or use multiple methods to disclose the same information.

5.4. The Exchange shall disclose information in the forms of disclosure implied in the laws of the Russian Federation, regulatory documents of the Bank of Russia, the Charter, the Policy and other internal documents of the Exchange.

5.5. The Exchange is guided by the list of material facts to be defined under the laws of the Russian Federation when determining information that can impact the Exchange's valuation and the price of its securities. If information is disclosed voluntarily, the Exchange is guided by the list defined herein and the materiality of information for the Stakeholders taking investment and management decisions. Meanwhile, procedures for timely disclosure of such information shall be determined in other Exchange's regulations.

6. Engagement of Stakeholders

6.1. An important part of the Moscow Exchange's policies is the engagement of stakeholders. To ensure such engagement:

6.1.1. The Moscow Exchange shall maintain a dedicated page on its website, where useful information for shareholders and investors shall be posted, including:

- Investor Calendar, regularly updated;
- shareholder and investor FAQ;
- news and press releases on key operational areas of the Moscow Exchange;
- information on stocks listed at the Moscow Exchange, including the stock price trends and the historical dividend payments;
- information materials for shareholders and investors (including those related to the disclosure of financial statements of the Moscow Exchange);
- operating statistics containing data on monthly trading volumes of the Group;
- corporate governance information;
- contacts;
- any other useful information on the activities of the Moscow Exchange.

6.1.2. The Moscow Exchange shall hold presentations, meetings, conference calls, press conferences, and road shows with the participation of top managers and key executives of the Moscow Exchange.

6.1.3. The Moscow Exchange shall from time to time arrange for the meetings of the Chairperson of the Executive Board with the media.

6.1.4. The Moscow Exchange shall provide an opportunity for stakeholders to contact the Moscow Exchange and to submit their proposals, ask questions and receive answers via feedback forms posted in various sections of the Moscow Exchange website, as well as through authorised units of the Moscow Exchange referred to in Clause 6.2 hereof.

6.1.5. The Moscow Exchange shall hold workshops, conferences, forums and other public events, for promotional and development purposes of the Moscow Exchange.

6.1.6. The Moscow Exchange shall use other means of communication between the members of management bodies, officials and employees of the Moscow Exchange with its stakeholders.

6.2. The following management bodies (their members), structural units and officials of the Moscow Exchange shall be authorised to communicate with Stakeholders:

6.2.1. Chairperson of the Executive Board may communicate with any Stakeholder(s) on all matters relevant to the activities of the Moscow Exchange.

6.2.2. Members of the Executive Board may communicate with any Stakeholder(s) on activities of the Moscow Exchange, which they are responsible for or supervise, and on other matters as agreed by the Chairperson of the Executive Board.

6.2.3. Members of the Supervisory Board may communicate with Stakeholder(s) in accordance with Section 7 of the Policy.

6.2.4. The Investor Relations Director may communicate with financial analysts, shareholders and investors on all matters of their interest.

6.2.5. The Head of Subdivision performing the functions of the Exchange's Corporate Secretary (further referred to as the Director of the Corporate Governance Department) may communicate with shareholders and investors on the matters concerning disclosure of and access to information, preparation for and holding the General Meeting of Shareholders and the shareholders' rights and with other Stakeholders on their access to information.

6.2.6. The Head of the Subdivision responsible for communication activities may communicate with Stakeholders, except the media, on organisation of events, and on any matters with the media.

6.3. The Exchange agrees that media engagement that is both active and effective allows for sharing of information with all groups of Stakeholders. Except as otherwise provided by the law, the management bodies (their members), subdivision and officials of the Exchange may disclose to the Stakeholders neither the confidential information in any form, nor the information that is subject to mandatory publication by the Exchange in a news line, until such publication.

6.4. Any abuse by the Stakeholders of their rights, which manifested in an action or omission intended to harm the Shareholders, the Moscow Exchange, or its clients, shall be regarded as unacceptable behaviour.

6.5. The Exchange acknowledges Any matters concerning communications between the Moscow Exchange and the mass media and not regulated by this Policy, including organisation of communication activities not related to the purposes of this Policy, in particular, promotion of the Moscow Exchange for advertising and marketing purposes, shall be governed by the Regulation on Communications and other internal regulations of the Moscow Exchange.

7. Supervisory Board's Role in Stakeholder Engagement

The Supervisory Board members taking into account their fiduciary duties may communicate with shareholders and other Stakeholders on such matters and in such manner as set forth in this Section.

On all other matters, the shareholders and other Stakeholders may contact the management bodies (their members), structural units and officials of the Moscow Exchange as specified in Clause 6.2 hereof.

7.1. Supervisory Board Relations with Shareholders

7.1.1. In order to obtain additional information on decisions made by the Supervisory Board (provided that the relevant information has been disclosed by the Moscow Exchange and without disclosing information on or/ and providing access to the details of discussing matters at the Supervisory Board meeting), and to communicate its opinion on such decisions, the shareholders of the Moscow Exchange shall have an opportunity to contact the Chairperson of the Supervisory Board or the senior independent director (if any) through:

- the Corporate Governance Department of the Moscow Exchange;
- the Investor Relations Director;
- feedback forms posted on the Moscow Exchange's website.

7.1.2. In order to elect the most efficient members of the Supervisory Board who best meet the purposes and objectives of the Moscow Exchange and its shareholders, the shareholders, when nominating candidates to the Supervisory Board, may communicate with (send the message to) the Chairperson of the Supervisory Board or the Chairperson of the Nomination and Remuneration Committee of the Supervisory Board to select candidates to the Exchange's Supervisory Board and request recommendations on voting to elect candidates to the Exchange's Supervisory Board through the Corporate Governance Department of the Moscow Exchange.

7.1.3. As shareholders owning at least 2% of voting shares of the Exchange may put issues on the agenda of the annual General Meeting of Shareholders and nominate candidates to the

Exchange’s Supervisory Board as well as propose candidates to the Supervisory Board if the agenda of an extraordinary General Meeting of Shareholders includes the issue of Supervisory Board members’ election, they may exercise such rights by sending their proposals to the Chairperson of the Supervisory Board through the Exchange’s Corporate Governance Department.

7.1.4. In order to obtain information on the matters categorised by the CGC of the Moscow Exchange as material corporate actions that are proposed by the Supervisory Board for submission to the Moscow Exchange’s General Meeting of Shareholders or the material corporate actions to be decided on the discretion of the Supervisory Board, the shareholders shall, from the time the agenda of the Supervisory Board meeting has been disclosed until the start of the meeting, have an opportunity to contact the Chairperson of the Supervisory Board or the senior independent director (if any) through:

- the Corporate Governance Department of the Moscow Exchange;
- the Investor Relations Director;
- feedback forms posted on the Moscow Exchange’s website.

7.1.5. In order to identify and resolve of the corporate conflicts (disputes concerning the corporate activities of the Moscow Exchange), the shareholders shall have an opportunity to contact the Chairperson of the Supervisory Board or the senior independent director (if any) or the Chairperson of the Audit Committee of the Supervisory Board through the Corporate Governance Department of the Moscow Exchange.

7.1.6. In order that the shareholder(s) that hold in the aggregate at least 5 percent of the voting shares of the Moscow Exchange may exercise their right to include any of the issues stipulated by the Provisions on the Supervisory Board of the Moscow Exchange in the agenda of the meeting of the Supervisory Board, such shareholders shall have an opportunity to submit their proposals to the Chairperson of the Supervisory Board through the Corporate Governance Department of the Moscow Exchange.

7.2. Supervisory Board Relations with Employees

7.2.1. The Moscow Exchange is committed to provide its employees and their representative bodies (if any) with a possibility of freely expressing their concerns about allegedly illegal, dishonest or unethical actions violating their rights and committed by any official of the Moscow Exchange, including in cases where a labour or other related conflict could not be resolved using the procedures established by the Moscow Exchange’s internal regulations. In order to prevent any risks arising from such actions and to protect the employees, the employees or their representative bodies (if any) shall have an opportunity to appeal, on a confidential basis, to the Chairperson of the Audit Committee of the Supervisory Board. The Chairperson of the Audit Committee of the Supervisory Board shall, having considered such appeal, have the right to apply to a relevant executive body of the Moscow Exchange for taking adequate measures to eliminate violations.

7.2.2. Any employees and/or their representative body may apply to the Chairperson of the Audit Committee of the Supervisory Board through:

- the Corporate Governance Department of the Moscow Exchange;
- confidential electronic messaging system provided by the Moscow Exchange.

7.3. Supervisory Board Relations with Service Users

7.3.1. If any recommendations of a user committee addressed to an executive management body of the Moscow Exchange have not been implemented by such executive management body, the Chairperson of such user committee may request the Chairperson of the Supervisory Board to consider such recommendations and proposals at a meeting of the Supervisory Board through the Chair of the Exchange Council or the Corporate Governance Department.

7.4. Supervisory Board Relations with the Media and Public

7.4.1. Representatives of Russian and foreign mass media, financial, expert and industry associations and communities, rating agencies and other organisations who require the financial market information shall have an opportunity to contact the members of the Supervisory Board, on the matters concerning the activities of the Supervisory Board, at public events to which they invited by the Moscow Exchange, or by sending their inquiries directly to the Moscow Exchange.

7.4.2. Members of the Exchange's Supervisory Board may comment only on decisions taken by the Exchange's Supervisory Board and published under the Russian Federation laws and the Bank of Russia's regulatory documents according to the procedure set out in Clauses 7.4.3 and 7.4.4 of the Policy.

7.4.3. Verbal comments on the adopted and published decisions of the Exchange's Supervisory Board may be given by the Chair of the Exchange's Supervisory Board or the Deputy Chairperson, in case the Chairperson is not available.

7.4.4. Other members of the Exchange's Supervisory Board may comment on the adopted and published decisions of the Supervisory Board only at the written request of organisations specified in Clause 7.4.1 of the Policy. Such requests and communications may be sent to the official e-mail of the Moscow Exchange designed to communicate with mass media (PR@moex.com) for further processing by the Press Service of the Moscow Exchange. The request is then forwarded to a relevant member of the Supervisory Board by the Press Service through the Corporate Governance Department.

8. Mandatory Disclosure

8.1. The scope, time and procedure for disclosure of information subject to mandatory disclosure by the Moscow Exchange, including disclosure forms, are established by the laws of the Russian Federation and the Bank of Russia's regulations.

8.2. The Exchange makes mandatory disclosure of information as a public company being the issuer of securities, the trade organiser and the financial plarform operaotor. In case of other activities, the required disclosure of information is made in compliance with the laws of the Russian Federation and regulatory documents of the Bank of Russia governing such type of activity.

In compliance with the laws on combating illegal use of insider information and market manipulation, the Moscow Exchange shall disclose the information required by such laws.

9. Voluntary Disclosure

9.1. Along with the information subject to mandatory disclosure, the Moscow Exchange voluntary discloses information referred to in this Section, depending on whether it is important for the Stakeholders in making investment and management decisions.

9.2. The Moscow Exchange shall provide an unlimited access to the information disclosed on a voluntary basis for a period determined by the Moscow Exchange with due consideration to the relevance and materiality of such information for Stakeholders, as well as the practicability of maintaining access to such information.

9.3. The Moscow Exchange voluntary discloses the following information:

9.3.1. Information (besides the information subject to mandatory disclosure) on corporate governance at the Moscow Exchange:

- general corporate governance principles followed by the Exchange;
- the structure of the Moscow Exchange Group;
- the structure of Moscow Exchange's management bodies;

- information on activities of the Supervisory Board, including information on fulfilment by the Supervisory Board of duties related to its role in efficient risk management and internal control system at the Moscow Exchange;
- information on Moscow Exchange’s user committees, including the membership, regulation and decisions;
- the Dividend Policy of the Moscow Exchange;
- the Corporate Governance Code of the Exchange and comments on the Exchange’s peculiarities grounding differences between the Exchange’s Corporate Governance Code and the principles and recommendations of the corporate governance code recommended by the Bank of Russia.

9.3.2. Information on the strategy, corporate values and objectives of the Moscow Exchange.

9.3.3. Information on social and environmental responsibility of the Moscow Exchange, including information on the policy in those areas, sustainability report compiled under internationally recognized standards, results of the technical audit, quality control system audit and results of management system quality certification in terms of compliance with international standards.

9.3.4. Information to be provided to shareholders as pre-reads for the General Meeting of Shareholders and during the General Meeting of Shareholders, including.

9.4. If so decided by the authorised management body of the Exchange, the Exchange may disclose information on the financial performance of the Group, such as:

- information on material change in operating income;
- information on material change in net profit;
- information on material change in net assets (capital) value;
- information on other changes or risks for changes of the Moscow Exchange Group’s financial performance.

The information on the above changes shall be deemed material, if any of the Group IFRS financials moves upwards or downwards 10% compared to the maximum or minimum value reached in the 4 previous quarters, accordingly.

The information indicated in this item shall be disclosed within 3 (three) days from the date of taking such resolution by the Moscow Exchange’s authorised body.

9.5. In addition to information specified in Clause 9.3 and 9.4. above, the Exchange shall have the right to determine on its discretion other information that may be disclosed on a voluntary basis.

10. Disclosure of information in a limited scope and/or volume

10.1. If disclosing and (or) providing relevant information will (may) lead to restrictive measures against the Exchange and (or) other persons, including new restrictive measures against a person regarding whom the Exchange discloses and (or) provides information, the Exchange may, within the circumstances specified by the laws of the Russian Federation, regulatory documents of the Bank of Russia or a decision of the Board of Directors of the Bank of Russia:

10.1.1. disclose and/or provide information within a limited scope and (or) volume;

10.1.2. specify the information which the Exchange may not disclose and/or provide, and the persons about whom the information may not be disclosed and/or provided.

11. Access to Information

11.1. The Moscow Exchange shall provide access to information and the documents that the Moscow Exchange is obliged to keep and provide to shareholders and other Stakeholders in accordance with the Russian Federation laws.

11.2. When providing access to information and the documents, the Exchange is guided by applicable laws of the Russian Federation in differentiating the scope of shareholders' and Stakeholders' rights to access the documents.

11.3. In order to get access to the documents, shareholders must submit to the Moscow Exchange a request for such documents (hereinafter, the "Request").

11.3.1. The shareholder's Request shall be made in writing and contain all the necessary information provided for in the Bank of Russia's regulations.

11.3.2. The Request shall be submitted to the Exchange in the ways specified in the Bank of Russia's regulations.

11.3.3. If the access to the documents is through the issuance of copies of the documents, the Request may also contain an e-mail address to which the copies shall be sent.

11.3.4. It is recommended that the Request should indicate a contact telephone number and e-mail address for prompt communication with a shareholder.

In case the Request received by the Exchange specifies no communication channel to connect a shareholder and does not contain information on the method of receiving the copies, or the Request was filed in the way not provided for in the Bank of Russia's regulations or the Exchange's Policy, such Request shall not be considered.

11.4. A shareholders shall read the documents in the presence of an employee of the Moscow Exchange.

11.4.1. A shareholders shall read the documents and their copies shall be issued to him/her within the Exchange's business hours. If a shareholder fails to get familiarised with all the requested documents within such business hours, he/she may continue to do so on other days.

11.4.2. A shareholder shall read the documents and their copies shall be issued to him/her personally only after he/she show their identity document.

11.5. The Exchange provides access to documents and information to a shareholder within the following periods:

- within seven (7) business days from the date of receipt by the Moscow Exchange of the Request for information (materials) to be provided to those eligible to participate in the General Meeting of Shareholders, and if such request was received before the due date for information (materials) to be provided to shareholders in preparation for the general meeting – from the due date;
- within seven (7) business days from the date the Request for documents mentioned in Article 91 of the Federal Law *On Joint-Stock Companies* was submitted to the Moscow Exchange.

11.6. If so indicated in the Request, the Exchange shall certify the copies by a signature of an authorised person and affixed by the Exchange's seal (if any).

If the authorised person is other than the CEO, the documents requested by a shareholder shall be accompanied with a document affirming the authorities of the person authorised by the Exchange to certify the copies.

11.7. If the Request indicates that the copies should be sent by e-mail, such copies shall be sent uncertified to an e-mail address specified in such Request.

11.8. The Moscow Exchange shall charge a fee from a shareholder for the copies of documents issued to him/her. The amount of such fee shall not exceed the cost of making the copies.

The fee rates and payment details shall be published on the website of the Moscow Exchange.

11.9. The copies shall be delivered (sent) to a shareholder after the shareholder pays an advance to cover expenses on copying and the delivery of copies. The term for delivering the copies under the Request provided for in Clause 11.5 starts from the moment the expenses are fully covered.

11.10. The Exchange provides access to the documents containing a commercial secret pursuant to the procedure specified in the Bank of Russia's regulations and only with the shareholder's signing a non-disclosure agreement. The template may be found on the Exchange's website.

11.11. The Exchange's documents (their copies) containing a state, bank or any other secret protected by law, except for the information specified in Clause 11.10 hereof, shall be delivered by the Exchange to shareholders without the information that constitutes such secret.

11.12. The Moscow Exchange may refuse to provide access to information and documents in the cases stipulated by the laws of the Russian Federation and the Bank of Russia's regulations. In case of a refusal to provide information and documents, the Moscow Exchange shall inform a shareholder about causes for such refusal within the established term.

12. Rumours and Speculations

12.1. The Moscow Exchange shall disclose reliable information only. In case of spreading rumours that form a distorted view to the evaluation by the Moscow Exchange and largely affect the price of its securities, or expose to risk the interests of shareholders and investors, the Moscow Exchange shall promptly clarify its position on such rumours.

12.2. The management bodies (their members), structural units and officials of the Moscow Exchange shall take all reasonable steps to refute false information, especially when such information may cause damage to the Moscow Exchange and its shareholders.

12.3. The Moscow Exchange shall make no accurate forecasts about its net income and other financial indicators until a relevant press release is published. Nevertheless, the Moscow Exchange may send to the Stakeholders the preliminary information about forecasted key financial indicators. This information may be provided in order to get an objective evaluation of the business and prospects of the Moscow Exchange by the shareholders, investors and financial analysts under the following conditions:

- Such information is non-confidential and/or has not been disclosed by the Moscow Exchange earlier.
- Such information contains no accurate forecasts in relation to the financial and business indicators of the Moscow Exchange.
- Such information has been prepared or approved by the Investor Relations Director.

12.4. Such preliminary information may include:

- information on new projects and services;
- evaluation of operating and capital expenditures, need for capital by subsidiaries of the Moscow Exchange, dividends, depreciation, and debt burden;
- assessment of fee and commission income and net interest income movements;
- other commercial and technical information, subject to the conditions listed above.

12.5. The preliminary information should not contradict to the information disclosed earlier in any form, including the Moscow Exchange's annual, quarterly and other reports, press releases, notices of material facts, and reports of insider information disclosure.

12.6. In case the preliminary information is in the form of a written document, such document must contain a warning that such information is preliminary and may change.

12.7. The preliminary information on financial and business indicators of the Moscow Exchange may be discussed in the normal course of business by the management bodies (their members) of the Moscow Exchange, as well as by those employees of the Moscow Exchange whose job is connected with preparation and disclosure of financial indicators.

13. Protection of Confidential Information

13.1. The Moscow Exchange shall protect confidential information the access to which is restricted by the laws of the Russian Federation and internal regulations of the Moscow Exchange, as determined by the laws of the Russian Federation and internal regulations of the Moscow Exchange.

13.2. The Moscow Exchange shall take any and all measures to protect confidential information (including determination of a list of such confidential information), keeping a reasonable balance between the openness of the Moscow Exchange and the commitment not to prejudice its interests. The Moscow Exchange shall determine the procedures for handling and use of such information and the persons responsible for supervising the observance of such procedures.

13.3. The Moscow Exchange shall keep confidential the commercial or other secrets protected by law and the information provided by trading members in accordance with the rules of organised trade. The Moscow Exchange may provide such information to trading members only, also to other persons with the consent of relevant trading members, except in cases where the provision of such information without such consent is authorised by the laws of the Russian Federation.

13.4. Measures aimed at ensuring the confidentiality of information (data and documents) that is not publicly available shall be established by the internal regulations of the Moscow Exchange.

13.5. If the information requested by shareholders is confidential, the shareholders are notified of that and shall protect its confidentiality.

14. Monitoring the Observance of the Policy

14.1. The Supervisory Board of the Moscow Exchange shall monitor the observance of the Policy and plays a key role in ensuring the transparency of the Moscow Exchange, the timeliness and completeness of information disclosure by the Moscow Exchange, and the unhindered access of the shareholders to documents of the Moscow Exchange.

The Supervisory Board of the Moscow Exchange may authorise the Audit Committee of the Supervisory Board or the Corporate Governance Department of the Moscow Exchange to monitor the observance of the Policy.

14.2. This Policy shall be implemented by the executive bodies of the Moscow Exchange. Executive bodies of the Moscow Exchange shall be responsible for the implementation of the Policy, including completeness and accuracy of information disclosed.

14.3. To ensure the continuity of information disclosure process and the coordination of all structural units of the Moscow Exchange engaged in the information disclosure process, the Moscow Exchange shall set down unified requirements to be disseminated among its employees. The Moscow Exchange shall approve internal documents (rules, regulations, etc.) aimed at the imposition of unified requirements and performance of information disclosure functions/responsibilities by the relevant structural units and employees of the Moscow Exchange.

14.4. In case of a violation of the current laws or regulations of the Bank of Russia or this Policy, which caused a damage to the Moscow Exchange and/or its shareholders, person(s) found guilty of such violation shall be held liable in accordance with the laws of the Russian Federation.