

Rules for circulation of the Company's insider information

1. Ban on the usage of the Company's insider information.
 - 1.1 Persons with access to the insider information towards the Company or financial instruments, including those listed as the Company's insiders it is necessary to comply the following rules.

Insider information is not to be used:

 - 1) for executing transactions with the Company's financial instruments related to the insider information at own expense or at the expense of the third party, except for transactions within the framework of executing liabilities in purchase or sale of the Company's financial instruments which term of execution became due if such a liability appeared as a result of the transaction executed before the person learnt the insider information;
 - 2) through transmitting the information to the other person, except for cases of transmitting this information to a person included into the insiders list due to the execution of liabilities prescribed by the legislation of the Russian Federation, or to the execution of labour obligations or clauses of a civil legal agreement;
 - 3) through advising the third parties oblige or otherwise inspire them to purchase or sell financial instruments of the Company;
 - 4) for market manipulation.
 - 1.2 Persons with access to the Company's insider information the agreement with which is cancelled. Under this agreement, such persons obtained access to the Company's insider information bear liability for dissemination and usage of insider information in accordance with the existing legislation of the Russian Federation.
 - 1.3 Transmission of the insider information to the editorial board, chief editor, journalist, or other mass-media employee to be published means no breach of the ban. At the same time, the transmission of such information to be published or publication itself does not release from liability for the illegal receipt, usage, disclosure of data contained state, commercially classified, official, or other legally protected information, and from the compliance with the liability to disclose or transmit the insider information.
2. The procedure of access and protection of the insider information confidentiality.
 - 2.1. The Company introduces an insider information confidentiality protection regime.
 - 2.2. Access to the Company's insider information is available persons included into the Company's insiders list who perform functions within the framework of the concluded labour and civil legal agreements, as well as in accordance with the legislation of the Russian Federation.
 - 2.3. Members of the Board of Directors, members of the Administration Board, members of the Company's Internal Audit Commission, Director General have the right of unlimited access to any insider information of the Company.

The right of unlimited access to the insider information is granted to persons with labour or civil legal agreements concluded with the Company, and which work with the insider information within the frameworks of powers fixed by such labour or civil legal agreements.
 - 2.4. Access to certain insider information to persons not included into the Company's insider information is registered on the basis of written application where reasons to obtain information are stated, and personal details are submitted for simultaneous inclusion of such

persons into the insiders list.

2.4. In case the works or services performed or rendered to the Company by the third party mean usage or possible access by such persons to the insider's information, agreements concluded with such persons should contain requirements in complying the procedure of applying insider information stipulated by the Company, as well as measures of liability for breaking these requirements.

2.5. The Company has the right to introduce special procedures for accessing the Company's insider information aimed at preventing illegal usage of the Company insider information:

- Limit access to certain insider information for certain employees of the Company;
- Introduce procedure to protect working places, and places to store documents from unauthorized access and observance;
- Use technical appliances to protect information systems that prevent from misinterpretation, breach of the insider information confidentiality and unauthorized access to such information in accordance with the Company's valid internal documents.

2.6. In order to preserve insider information in solid and electronic forms, the Company may ensure the following:

- A access distinction system for employees to the premises where the insider information is stored and/or processed, as well as to the local network resources, installs an access permission system to computer aids containing the insider information (keys, passwords, individual identifiers, etc.), as well as for the operation with floppy disk drives, CD, DVD, and other carriers, e-mail, Internet, ensures a protection system for externally sent information.
- Application of administrative and technical measures aimed at excluding unauthorized access to the insider information (ensured through blocking access of a user to the system when discovering attempts of unauthorized access);
- Preclusion of unauthorized connection of external devices and installation of software; avoidance of transmitting insider information through the public data network (including Internet);
- Usage of technical information appliances to protect the insider information transmitting through communication channels;
- Inspections of complying the established procedure for the Company's employees to use electronic media provided by the Company to work within powers fixed in labour or civil legal agreements.

2.7. Persons familiar with the Company's insider information shall comply with the following mandatory rules:

- Ban on usage of the insider information;
- Employees of the Company's business units authorized for public relations and interact with the shareholders with regard to the execution of functions should ensure equal opportunity to all the interested parties to simultaneously access the significant disclosed information on the Company's activities;
- When dealing with certain media of insider information, preclude possible examination thereof by the other employees of the Company, including those having access to the documents and data containing insider information, but in other trends of activity;
- strictly comply with the procedure of store documents containing the insider information, and namely:
 - store such documents in safety-deposit boxes or in locked cabinets and boxes of the desk;

- when exiting premises, do not leave documents containing the Company's insider information on the desks;
 - do not use private email address to send and forward documents containing the Company's insider information;
 - do not unnecessarily take the documents containing the insider information out of the Company's working premises;
 - timely delete all the documents that should not be stored, but possibly contain insider information, and delete all the computerized insider information that should not be stored;
 - when orally reporting the information, notice the interlocutor of the fact that this information is insider's, and its illegal usage involves liability in accordance with the legislation of the Russian Federation;
 - when drafting documents, business correspondence is limited by minimum, actually necessary data containing insider information;
 - promptly inform the unit supervising over the usage of the insider information, as well as other units responsible for ensuring safety in the Company, of the facts of loss of the documents containing insider information, as well as passes, keys from premises where such information is stored; attempts of unauthorized access to the documents and carriers containing insider information;
 - promptly inform the responsible business unit ensuring operation of electronic media of the malfunction of portable PCs where the person deals with the insider information;
 - inform the business unit supervising over the usage of insider information of the conditions which facilitate or may result in disclosure of the insider information, or occurred facts of disclosing such information which become known to the person;
- 2.8. Persons without authorized access to the insider information who gained casual access thereto, shall:
- stop examining such information;
 - take exhaustive measures to preserve confidentiality of such insider information;
 - preclude dissemination or reporting such insider information to third party;
 - preclude usage of such insider information in accordance with the ban specified by the Company.
- 2.9. Liability for maintaining the insider information confidentiality regime in the Company towards the documents containing the insider information resulted from the operations of the Company's business units is charged with heads of such units of the Company.
- 2.10. The Company's employees received access to the insider information shall meet all the requirements in protection and usage of the insider information specified in this Regulation.