

**List of Insider Information of SUEK JSC**  
**(New Version)**

This List has been prepared in accordance with Federal Law dated 27.07.2010 No. 224-FZ “On Countering Misuse of Insider Information and Manipulation of the Market and on Making Modifications in Certain Legislative Instruments of the Russian Federation”, Instruction by the Bank of Russia dated 11.09.2014 No. 3379-Ou “On the List of Insider Information of Persons Who Are Specified in Clauses 1 to 4, 11 and 12 of Article 4 of the Federal Law “On Countering Misuse of Insider Information and Market Manipulation and on Making Modifications in Certain Legislative Instruments of the Russian Federation”” and other regulatory instruments that govern issues of statutory regulation of use of insider information.

**Insider information of SUEK JSC as defined in clause 2.1 of Internal Control Rules to Prevent, Identify and Counter Misuse of Insider Information and (or) Manipulation of the Market of SUEK JSC includes but is not limited to the following information (the list approved by the Bank of Russia):**

- 1) information about convening and holding a general meeting of shareholders of SUEK-Finance LLC, including information about the agenda, date of the meeting, date of preparing the list of persons who have the right to attend the general meeting and decisions made by the general meeting of shareholders of SUEK-Finance LLC;
- 2) information about the agenda of a meeting of the board of directors of SUEK-Finance LLC and about decisions made by the meeting;
- 3) information about instances where the board of directors of SUEK-Finance LLC does not make the following decisions, which are to be made in accordance with federal laws:
  - on convening an annual (ordinary) general meeting of shareholders of SUEK-Finance LLC and about other decisions on preparing, convening and holding an annual (ordinary) general meeting of SUEK-Finance LLC;
  - on convening (holding) or on a refusal to convene (hold) an extraordinary general meeting of shareholders of SUEK-Finance LLC on a demand made by the internal audit commission (internal auditor) of SUEK-Finance LLC, the auditor of SUEK-Finance LLC or shareholders holding, in the aggregate, at least one tenth of the total number of votes of shareholders of SUEK-Finance LLC;
  - on including or a refusal to include proposed issues into the agenda of a general meeting of shareholders of SUEK-Finance LLC and (or) on including or a refusal to include proposed nominees into the list of nominees to be elected by a vote into the respective body of SUEK-Finance LLC, which have been proposed by any shareholder of SUEK-Finance LLC;
- 4) information about submission by SUEK-Finance LLC of an application for making entries concerning reorganization, windup or liquidation of SUEK-Finance LLC in the Unified State Register of Entities or, if the authority that accomplishes State registration of entities has made a decision to refuse to make the said entries, information on making such a decision;
- 5) information about SUEK-Finance LLC gaining control over an entity materially important to it and about termination of grounds for control over such an entity;
- 6) information about emergence of a person controlling SUEK-Finance LLC and about termination of grounds for such control;
- 7) information about making a decision on reorganization or liquidation by an entity that controls SUEK-Finance LLC or is controlled by SUEK-Finance LLC and materially important to it or by a person providing security of bonds issued by SUEK-Finance LLC;
- 8) information about submission of an application by an entity that controls SUEK-Finance LLC or is controlled by SUEK-Finance LLC and materially important to it or by a person providing security of bonds issued by SUEK-Finance LLC for making entries concerning reorganization, windup or liquidation of the said entities in the Unified State Register of Legal Entities;
- 9) information to the effect that SUEK-Finance LLC, a person that controls SUEK-Finance LLC, an entity controlled by SUEK-Finance LLC and materially important to it, or a person providing security of bonds

- issued by SUEK-Finance LLC has acquired the insolvency (bankruptcy) attributes described in insolvency (bankruptcy) laws of the Russian Federation;
- 10) information about an arbitration court's acceptance of an application for holding SUEK-Finance LLC, a person controlling it, an entity controlled by SUEK-Finance LLC and materially important to it, or a person providing security of bonds issued by SUEK-Finance LLC bankrupt and about an arbitration court's making of a decision to hold the said persons bankrupt, initiate a bankruptcy procedure or terminate bankruptcy proceedings against them;
  - 11) information about a legal claim made against SUEK-Finance LLC, an entity controlling SUEK-Finance LLC, an entity controlled by SUEK-Finance LLC and materially important to it, or a person providing security of bonds issued by SUEK-Finance LLC, which claim amounts to 10 or more per cent of the book value of the said persons' assets as of the date of the end of the most recent completed reporting period preceding the making of the claim, or another legal claim whose settlement, in the opinion of SUEK-Finance LLC, may materially affect the financial and economic position of SUEK-Finance LLC or the said persons;
  - 12) information about the date as of which persons entitled to rights attached to issue-grade securities of SUEK-Finance LLC are determined, including information about the date as of which the list of persons who have the right to attend the general meeting of shareholders of SUEK-Finance LLC is prepared;
  - 13) information about the following decisions made by authorized bodies of SUEK-Finance LLC:
    - on placement of issue-grade securities by SUEK-Finance LLC;
    - on the date when placement of issue-grade securities by SUEK-Finance LLC begins;
    - on suspension of placement of issue-grade securities by SUEK-Finance LLC; and
    - on a refusal to place an issue (additional issue) of issue-grade securities by SUEK-Finance LLC;
  - 14) information about completion of placement of issue-grade securities by SUEK-Finance LLC;
  - 15) information about an application submitted (filed) by SUEK-Finance LLC for State registration of an issue (additional issue) of issue-grade securities, registration of a securities prospectus, State registration of a bond programme, registration of modifications made in a decision on an issue (additional issue) of issue-grade securities and (or) in a securities prospectus, State registration of modifications in a bond programme, in terms and conditions of an issue (additional issue) of bonds and (or) in a bond prospectus within the framework of a bond programme and (or) State registration of a report on results of an issue (additional issue) of issue-grade securities;
  - 16) information about submission (giving) by SUEK-Finance LLC of a notice of results of an issue (additional issue) of issue-grade securities by SUEK-Finance LLC;
  - 17) information about an arbitration court's award to hold an issue (additional issue) of issue-grade securities by SUEK-Finance LLC invalid;
  - 18) information about redemption of issue-grade securities by SUEK-Finance LLC;
  - 19) information about yield accrued and (or) paid to holders of issue-grade securities by SUEK-Finance LLC;
  - 20) information about entry by SUEK-Finance LLC into an agreement with the Russian trade organizer in the securities market so as to include issue-grade securities by SUEK-Finance LLC into the list of securities admitted by the Russian trade organizer to organized trading and an agreement with a Russian stock exchange so as to include issue-grade securities issued by SUEK-Finance LLC into the quotation list of the Russian stock exchange;
  - 21) information about entry by SUEK-Finance LLC into an agreement to include issue-grade securities issued by SUEK-Finance LLC or securities by a foreign issuer that certify rights attached to issue-grade securities by SUEK-Finance LLC into the list of securities admitted to trading in a foreign organized (regulated) financial market and an agreement with a foreign stock exchange to include such securities into the quotation list of the foreign stock exchange;
  - 22) information about inclusion of issue-grade securities issued by SUEK-Finance LLC or securities by a foreign issuer that certify rights attached to issue-grade securities by SUEK-Finance LLC into the list of securities admitted to trading in a foreign organized (regulated) financial market, about exclusion of such securities from the said list and about inclusion of such securities into or their exclusion from the quotation list of a foreign stock exchange;
  - 23) information about entry by SUEK-Finance LLC into an agreement to maintain (stabilize) prices of issue-grade securities by SUEK-Finance LLC (securities by a foreign issuer that certify rights attached to issue-grade securities by SUEK-Finance LLC), about terms and conditions of the said agreement and about termination of the said agreement;

- 24) information about submission by SUEK-Finance LLC of an application for an authorization from the Bank of Russia to place and (or) arrange trading in its issue-grade securities outside the Russian Federation;
- 25) information about a default by SUEK-Finance LLC on its liabilities to holders of its issue-grade securities;
- 26) information about a person's acquisition or about termination of a person's right to dispose, directly or indirectly (through persons controlled by it), on its own or jointly with other persons related to it by an asset management agreement and (or) a simple partnership agreement and (or) a commission agreement and (or) a shareholder agreement and (or) another agreement whose subject matter is exercise of rights certified by shares in SUEK-Finance LLC, of a certain number of votes attached to shares that constitute the registered capital of SUEK-Finance LLC if the said number of votes is 5 per cent or has exceeded or become less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 per cent of the total number of votes attached to shares that constitute the registered capital of SUEK-Finance LLC;
- 27) information about errors revealed in previously disclosed accounting (financial) statements of SUEK-Finance LLC if such errors may materially affect prices of issue-grade securities by SUEK-Finance LLC;
- 28) information about entry by SUEK-Finance LLC or a person providing security of bonds issued by SUEK-Finance LLC into a transaction amounting to 10 or more per cent of the book value of assets of SUEK-Finance LLC or the said person as of the date of the end of the most recent completed reporting period preceding the transaction;
- 29) information about entry by an entity controlling SUEK-Finance LLC or an entity controlled by SUEK-Finance LLC and materially important to it into a transaction that laws of the Russian Federation classify as a major transaction;
- 30) information about entry by SUEK-Finance LLC into an interested-party transaction if the amount of such a transaction is as follows:
  - (a) for issuers the book value of whose assets is no more than 100 billion rubles as of the date of the end of the most recent completed reporting period preceding the decision, which is made by the issuer's authorized managing body, to consent to the transaction or, if no decision to consent to the transaction was made, as of the date of the end of the most recent completed reporting period preceding entry into such a transaction by the issuer: more than 500 million rubles or two or more per cent of the book value of the issuer's assets as of the date specified in this paragraph; and
  - (b) for issuers the book value of whose assets exceeds 100 billion rubles as of the date of the end of the most recent completed reporting period preceding the decision, which is made by the issuer's authorized managing body, to consent to the transaction or, if no decision to consent to the transaction was made, as of the date of the end of the most recent completed reporting period preceding entry into such a transaction by the issuer: one or more per cent of the book value of the issuer's assets as of the date specified in this paragraph;
- 31) information about a change in the composition and (or) amount of collateral to secure collateralized bonds by SUEK-Finance LLC or, in case of a change in the composition and (or) amount of property mortgaged to secure mortgage-backed bonds by SUEK-Finance LLC, information on such changes if the latter are caused by replacement of any mortgage-backed claim that constitutes mortgage collateral for bonds or replacement of other property that constitutes mortgage collateral for bonds, whose value (pecuniary valuation) is 10 or more per cent of the amount of the mortgage collateral for the bonds;
- 32) information about a change in the value of assets of a person providing security of bonds issued by SUEK-Finance LLC, which change amounts to 10 or more per cent, or about another change in such a person's financial and economic position that, in the opinion of SUEK-Finance LLC, is material;
- 33) information about acquisition by SUEK-Finance LLC of the right or termination of the right of SUEK-Finance LLC to dispose, directly or indirectly (through persons controlled by it), on its own or jointly with other persons related to SUEK-Finance LLC by an asset management agreement and (or) a simple partnership agreement and (or) a commission agreement and (or) a shareholder agreement and (or) another agreement whose subject matter is exercise of rights certified by shares in an entity whose issue-grade securities are admitted to organized trading or the value of whose assets exceeds 5 billion rubles, of a certain number of votes attached to voting shares that constitute the registered capital of the said entity if the said number of votes is 5 per cent or has exceeded or become less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 per cent of the total number of votes attached to voting shares that constitute the registered capital of such an entity;
- 34) information about a person's acquisition of a right or termination of a person's right to dispose, directly or indirectly (through persons controlled by it), on its own or jointly with other persons related to it by an asset management agreement and (or) a simple partnership agreement and (or) a commission agreement and (or) a shareholder agreement and (or) another agreement whose subject matter is exercise of rights certified by

- shares in an entity that provided a surety bond for bonds issued by SUEK-Finance LLC, of a certain number of votes attached to voting shares that constitute the registered capital of the said entity if the said number of votes is 5 per cent or has exceeded or become less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 per cent of the total number of votes attached to voting shares that constitute the registered capital of such an entity;
- 35) information about entry by SUEK-Finance LLC, a person controlling it or a person controlled by SUEK-Finance LLC into an agreement that provides for an obligation to acquire issue-grade securities issued by SUEK-Finance LLC;
  - 36) information about obtaining, suspension, resumption, reissuance, revocation (cancellation) or termination on other grounds of an authorization (licence) issued to SUEK-Finance LLC for a certain activity that is of material financial and economic importance for SUEK-Finance LLC;
  - 37) information about expiry of authority of the single-member executive body and (or) members of the collegiate executive body of SUEK-Finance LLC;
  - 38) information about a change in the amount of a share in the registered (share) capital of SUEK-Finance LLC and entities that are controlled by SUEK-Finance LLC and are materially important to it as held by:
    - persons who are members of the board of directors (supervisory board) or members of the collegiate executive body of SUEK-Finance LLC and the person who holds the position (performs functions) of the single-member executive body of SUEK-Finance LLC; and
    - persons who are members of the board of directors (supervisory board) or members of the collegiate executive body of a managing entity and the person who holds the position (performs functions) of the single-member executive body of the managing entity if authority of the single-member executive body of SUEK-Finance LLC has been handed over to the managing entity;
  - 39) information about emergence and (or) termination of the right of holders of bonds issued by SUEK-Finance LLC to demand early redemption of their bonds issued by SUEK-Finance LLC;
  - 40) information about engagement or replacement of entities that provide SUEK-Finance LLC with an intermediary's services in the course of meeting by SUEK-Finance LLC of liabilities under bonds or other issue-grade securities issued by SUEK-Finance LLC, including their names, places of business and amounts of their fees for the services, and about changes in the said information;
  - 41) information about a dispute concerning incorporation, administration of or holding a share in SUEK-Finance LLC if the decision settling the said dispute may materially affect prices of issue-grade securities by SUEK-Finance LLC;
  - 42) information about claims for meeting liabilities under bonds issued by SUEK-Finance LLS against the person who provided security of the bonds;
  - 43) information about placement, outside the Russian Federation, of bonds or other financial instruments that certify debt obligations to be fulfilled at the expense of SUEK-Finance LLC;
  - 44) information about acquisition (disposal) of shares in SUEK-Finance LLC or securities issued by a foreign issuer that certify rights attached to shares in SUEK-Finance LLC by SUEK-Finance LLC and (or) by entities controlled by SUEK-Finance LLC, except for controlled entities that are brokers and (or) asset managers and that have entered into the transaction on their own behalf but at the expense of a client who is neither SUEK-Finance LLC nor an entity controlled by SUEK-Finance LLC;
  - 45) information submitted or filed by SUEK-Finance LLC to (with) the respective authority (respective entity) of a foreign State, a foreign stock exchange and (or) other entities in accordance with foreign law for purposes of being disclosed or provided to foreign investors because of placement of or trading in issue-grade securities issued by SUEK-Finance LLC outside the Russian Federation, among other things, by way of acquisition of securities issued by a foreign issuer and to be placed (or already placed) in accordance with foreign law, if such information may materially affect prices of issue-grade securities by SUEK-Finance LLC;
  - 46) information that constitutes annual accounting (financial) statements of SUEK-Finance LLC and consolidated financial statements of SUEK-Finance LLC and that is contained in audit opinions prepared in respect of the said statements;
  - 47) information that constitutes interim accounting (financial) statements and consolidated financial statements of SUEK-Finance LLC for a reporting period consisting of three, six or nine months of the current year, which information is contained in audit opinions prepared in respect of the said statements, and, if SUEK-Finance LLC has interim financial statements and consolidated financial statements prepared in accordance with International Financial Reporting Standards (IFRS) brought into force in the territory of the Russian Federation in accordance with the procedure stipulated by resolution by the Government of the Russian

Federation dated 25 February 2011 No. 107 “On Approval of Regulations on Recognition of International Financial Reporting Standards and Explanations of International Financial Reporting Standards for Use in the Territory of the Russian Federation”, that constitutes such financial statements of SUEK-Finance LLC and, if audited, is contained in the respective audit opinions;

- 48) information that constitutes terms and conditions of placement of issue-grade securities, which terms and conditions have been determined in a decision approved by the authorized body of SUEK-Finance LLC concerning an issue (additional issue) of securities, in an approved bond programme and (or) in approved terms and conditions of an issue (additional issue) of bonds within the framework of a bond programme, except for information already disclosed in accordance with requirements of laws of the Russian Federation on the securities market;
- 49) information contained in a report (notice), which has been approved by the authorized managing body of SUEK-Finance LLC, on (of) results of an issue of issue-grade securities, except for information already disclosed in accordance with requirements of laws of the Russian Federation on the securities market;
- 50) information contained in a securities prospectus approved by the authorized body of SUEK-Finance LLC, except for information already disclosed in accordance with requirements of laws of the Russian Federation on the securities market;
- 51) information contained in quarterly reports signed by authorized persons of SUEK-Finance LLC, except for information already disclosed in accordance with requirements of laws of the Russian Federation on the securities market;
- 52) information about entry by SUEK-Finance LLC into a strategic-partnership agreement or another agreement not stipulated in clauses 20, 21, 23, 28, 30 and 35 of this List if entry into such agreements may materially affect prices of issue-grade securities by SUEK-Finance LLC;
- 53) information about holding and the agenda of (or a refusal to hold) a general meeting of holders of bonds issued by SUEK-Finance LLC and on decisions made by the general meeting of holders of bonds by SUEK-Finance LLC;
- 54) information about submission (giving) by SUEK-Finance LLC of a notice containing information on bondholders’ representative;
- 55) information about injunctive measures taken by a court, an arbitration court or an executive authority that conducts enforcement proceedings to protect money or other property owned by SUEK-Finance LLC, an entity that controls SUEK-Finance LLC, an entity controlled by SUEK-Finance LLC and materially important to it, or a person providing security of bonds issued by SUEK-Finance LLC, which constitutes 10 or more per cent of the book value of the said persons’ assets as of the date of the end of the most recent completed reporting period preceding the injunctive measures; and
- 56) information (received by SUEK-Finance LLC from pretrial investigation agencies or agencies of inquiry) about a criminal case brought against a member of the board of directors of SUEK-Finance LLC, the single-member executive body of SUEK-Finance LLC, an entity controlling SUEK-Finance LLC, an entity controlled by SUEK-Finance LLC and materially important to it, or a person providing security of bonds issued by SUEK-Finance LLC.

Information on issue-grade securities placed by SUEK-Finance LLC, which information is listed in clauses 13 to 16, 48, 49, 53 and 54 of this List, is classified as insider information of SUEK-Finance LLC if:

- the issue-grade securities by SUEK-Finance LLC are placed through organized trading; and
- the issue-grade securities of SUEK-Finance LLC that are being placed constitute an additional issue in relation to issue-grade securities of the issue that were admitted to organized trading or in whose respect a request to admit them to organized trading has been submitted.

Information on placed (traded) issue-grade securities by SUEK-Finance LLC that is listed in clauses 12, 18, 19, 23, 35, 39, 53 and 54 of this List is classified as insider information of SUEK-Finance LLC if the said issue-grade securities have been admitted to organized trading or if a request to admit them to trading at the securities market trade organizer’s has been submitted.

Information about a person providing security of bonds issued by SUEK-Finance LLC and about terms and conditions of such security, which information is listed in clauses 7 to 11, 28, 31, 32, 34, 42, 55, and 56 of this List, is classified as insider information of SUEK-Finance LLC if the said bonds have been admitted to organized trading or a request to admit them to organized trading has been submitted.

Information on a person providing security of bonds issued by SUEK-Finance LLC, which information is listed in 7 to 11, 28, 32 and 56 of this List, is not classified as insider information of SUEK-Finance LLC if this person is constituted by the Russian Federation, which has issued a State guarantee of the Russian Federation, by a

constituent entity of the Russian Federation, which constituent entity has issued a State guarantee of a constituent entity of the Russian Federation, or by a municipal formation, which has issued a municipal guarantee in respect of bonds by SUEK-Finance LLC.

Insider information of SUEK-Finance LLC does not include information or details based on such information that is (are) delivered by SUEK-Finance LLC and (or) a person(s) engaged by it to potential acquirers or is (are) used by SUEK-Finance LLC and (or) a person(s) engaged by it in order to issue recommendations or otherwise induce potential acquirers to acquire the respective securities because of placement (arrangements made for placement) and (or) an offer (arrangements made for an offer), in or outside the Russian Federation, of issue-grade securities issued by SUEK-Finance LLC, among other things, by way of placement of securities that are issued by a foreign issuer and certify rights attached to issue-grade securities issued by SUEK-Finance LLC, provided that potential acquirers are notified that such information (details) may be used by them only for purposes of deciding whether to acquire the securities being placed (offered).