

APPROVED

By ACRA CEO

Order No. 8/2-od dated March 15, 2021

Insider information list

1. General provisions

1.1. ACRA's List of Insider Information (hereinafter, the List) is made in pursuance of Federal Law No. 224-FZ dated July 27, 2010 "On countering the illegal use of insider information and market manipulation and on amendments to certain legislative acts of the Russian Federation" and the Bank of Russia's Order No. 5326-U dated November 21, 2019 "On the list of insider information of persons indicated in pars. 1-4, 11, and 12 of Article 4 of Federal Law No. 224-FZ dated July 27, 2010 'On countering the illegal use of insider information and market manipulation and on amendments to certain legislative acts of the Russian Federation' and the procedure and timing for disclosure thereof."

1.2. The List includes information referred to as insider information of ACRA, a credit rating agency.

2. List of insider information

2.1. Information on the assignment, confirmation, revision, or withdrawal of ACRA's credit ratings and credit rating outlooks.

2.1.1. Regarding:

- Issuers, including foreign issuers, and management companies;
- Trade organizers, clearing organizations, as well as depositories and credit institutions that settle transactions made through trade organizers;
- Securities admitted to organized trading or for which an application is submitted for their admission to organized trading.

2.1.2. Contained in:

- Minutes of rating committee meetings, as well as any forms of communication between ACRA employees regarding decisions taken by the rating committee;
- Records of Rating Committee meetings;
- Drafts rating press releases (before they are published on ACRA's website);
- Rating analysis materials, including those submitted to rating committee meetings;
- Other documents generated as part of the rating process.