

## List of insider information

### 1. General provisions

1.1. This list of insider information of Globaltrans Investment PLC (hereinafter referred to as “the Company”) is compiled in accordance with the requirements of Federal law No. 224 – FZ dated 27.07.2010 "On combating the unlawful use of insider information and market manipulation and on amendments to certain legislative acts of the Russian Federation", as well as in accordance with the Bank of Russia's Instruction No. 3379-Y dated 11.09.2014 "On the list of insider information of persons listed in paragraphs 1 - 4, 11 and 12 of article 4 of the Federal law "On combating the unlawful use of insider information and market manipulation and on amendments to certain legislative acts of the Russian Federation".

### 2. Insider information<sup>1</sup>

2.1. Information is considered insider information in relation to the Company if such information simultaneously meets the following criteria:

- the information is precise;
- the information is not publicly available;
- the information is directly or indirectly related to the Company and/or its financial instruments;
- disclosure of information would be likely to have a significant effect on the prices of the Company's financial instruments.

2.2. Subject to the criteria of paragraph 2.1 above, insider information includes the following information:

- information related to significant transactions and contracts of the Company;
- information about holding regular and extraordinary general meetings of the Company's shareholders and resolutions passed at such meetings;
- acquisition or disposal of property that is material to the Company;

2.3. The above examples are indicative only, but in any case in accordance with clause 2.6 of the Bank of Russia's Instruction dated September 11, 2014. No. 3379-Y "On the list of insider information of the persons listed in paragraphs 1 - 4, 11 and 12 of article 4 of the Federal law "On combating the unlawful use of insider information and market manipulation and on amendments to certain legislative acts of the Russian Federation" information disclosed on the Russian stock exchange will fully comply with the information disclosed in accordance with the rules of the London stock exchange and Market Abuse Regulation (MAR).

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<sup>1</sup> This provision reflects the definition of "insider information" in the Regulation on market abuse (Regulation No. 596/2014 of the European Parliament and of the Council of the European Union dated April 16, 2014 on Market Abuse Regulation ("MAR"), which applies to the Company. Paragraph 2.1 is to be interpreted in accordance with MAR.