

APPROVED
by the Supervisory Board
of CREDIT BANK OF MOSCOW
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CREDIT BANK OF MOSCOW
(public joint-stock company)
Information Policy Regulation

Moscow, 2018

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1. GENERAL PROVISIONS AND DEFINITIONS

1.1. CREDIT BANK OF MOSCOW's information policy (the "Information Policy") is developed under applicable Russian laws, the Charter, the Corporate Governance Code and other bylaws of CREDIT BANK OF MOSCOW (the "Bank").

1.2. The Information Policy is a set of core principles and procedures that govern information disclosure in order to provide the stakeholders' with the information necessary to make informed investment and managerial decisions, and also in order to contribute to the Bank's reputation through ensuring transparency.

1.3. The Information Policy specifies the list of disclosable information and documents and establishes the disclosure procedures and period. The list of restricted data and documents is specified and the procedure of their disclosure is provided for by the relevant bylaws.

1.4. Definition of terms used in the Information Policy:

"External communications" means public communications made by the Bank's employees in mass media, social networks, blogs, forums and other Internet platforms. External communications may concern both the bank's core business and any other subjects, including other economic agents, in particular, its related companies. The Bank makes external communications by disseminating text, audio- and visual messages.

"Business reputation (reputation)" means the qualitative and quantitative evaluation given by market participants to the Bank's business or actions of its shareholders, affiliates, subsidiaries or controlled entities and reflecting their willingness to maintain existing relationships and create new economic and other ties.

"M&PRD" means the Marketing and PR Directorate;

"Officers" means the Bank's employees who perform organisational, managerial, administrative and maintenance duties;

"Stakeholders" means the parties interested in the Bank's business: investors, shareholders, employees, clients, partners, mass media, public authorities etc.,

"Protected or confidential information" means information containing commercial, bank or official secrets that does not constitute mandatorily disclosable information and that derives actual or potential value from being unavailable to third parties who do not have legal free access to it;

"Insider information" means any precise and specific information which was not reported or released (including information constituting commercial, official and bank secrets, secrets of communication pertaining to postal transfers of monetary resources, and other legally protected information), and which, if reported or released, may substantially influence prices of financial instruments, foreign currency and/or products (such as information on one or several issuers of securities (the "issuer"); one or several asset management companies of investment funds, share investment funds and private pension funds (the "asset management company"); one or several business entities listed in Paragraph 2 of Article 4 of the Federal Law No. 224-F3 dated 27 July 2010 "On combating insider information abuse and market manipulation and on amending certain statutory acts of the Russian Federation" (the Insider Dealing Act), or one or several financial instruments, foreign currencies and/or products), and which is classified as information listed as insider information in Article 3 of the Insider Dealing Act;

"Commercial or official secrets" means any information about the Bank that is not generally accessible, if it derives actual or potential commercial value from being unavailable to third parties, if it cannot be freely accessed on legal grounds, and if reasonable measures are taken to protect it. Information that cannot constitute commercial or official secrets are specified by Russian law;

"Direct contacts with mass media" means provision of any information related to the bank's financial, business, social or other activity or unrelated to its activities to mass media through authorised representatives or directly by the bank's employee in consultation with M&PRD Vice President in various formats (for example, interviews, comments etc.).

"Public domain" means all external information domain, including all carriers (mass media, social networks, Internet etc.) with any message conveyance means (text, video, audio, graphic and other information).

"Comment" means a brief information material given by the Bank or an authorised representative upon request from mass media, social network actors and/or as suggested by M&PRD.

"Crisis situation" occurs when any information concerning affairs of the Bank, its employees, shareholders, companies of its related parties or companies influencing substantially its business and believed by M&PRD to be negative and/or controversial appears or is spread in mass media or Internet.

"Unauthorised comment" means an information communication or information material published in mass media in the Bank's name without the clearance procedure

“Dissemination of information” means disclosure to general public (public domain) of information on the Bank’s affairs or its position on any matter. It may take the form of information materials, statements in public speeches, answers to questions in a private conversation with mass media representatives, messages, images and photographs on the Internet, publication of financials, dissemination of audio-, visual and other materials etc.

“Regulatory bodies” means the authorised federal executive agency for financial markets and other Russian and foreign entities regulating public companies and operations with financial instruments;

“Mass media” means any mass media (print media, radio, TV, web resources etc.).

“Financial instrument” means a security or a derivative.

2. OBJECTIVES AND GOALS

2.1. The Bank's Information Policy has the following objectives:

- implementing the rights of all the groups of persons who are interested in obtaining information necessary to making managerial and/or investment decisions;
- increasing the Bank's transparency and investment appeal;
- decreasing the Bank's reputational and compliance risks;
- maintaining the Bank's business reputation.

2.2. The Bank's Information Policy has the following main goals:

- defining the main principles of providing all stakeholders with the information on the Bank's affairs;
- establishing and adhering to the unified approach to information disclosure on all the Bank's levels, efficiently coordinating the Bank's external and internal communications;
- ensuring the necessary level of information security and the protection of the Bank's confidential information;
- drawing the management's and/or the employees' closer attention to the requirements, restrictions and procedure of communication;
- setting principles of additional information disclosure in order to increase the Bank's investment appeal through increased transparency.

3. THE MAIN PRINCIPLES OF THE INFORMATION POLICY

3.1. The Information Policy is based upon the following principles:

3.1.1. **Regularity:** The Bank shall, firstly where so provided for by applicable laws, systematically inform all Stakeholders of its activities through all available channels, means and forms of disclosure.

3.1.2. **Operational efficiency:** The Bank shall ensure prompt delivery of information on significant events and facts that can affect the Bank's financial activities and the interests of the relevant parties.

3.1.3. **Neutrality:** The Bank shall not evade the disclosure of negative information on its activities that can affect the stakeholders.

3.1.4. **Completeness:** The Bank shall provide complete information in order to ensure the stakeholders' fullest possible understanding of the Bank's situation and/or specific matters of their concern.

3.1.5. **Availability:** The Bank shall provide the stakeholders with free, easy and cost-efficient access to disclosed information.

3.1.6. **Equality of rights:** The Bank shall guarantee equal rights to information to all stakeholders in accordance with regulations, requirements and restrictions provided for by Russian laws.

3.1.7. **Credibility:** The Bank shall provide the stakeholders with information that is true and ensure the control of disseminated information in order to prevent errors and omissions.

3.1.8. **Balance:** The Bank shall balance transparency and confidentiality to realize all stakeholders' rights to information (provided that the stakeholders observe the Bank's interests as regards restricting unauthorised persons' access to protected or confidential information and/or information constituting secrets of state and the Bank's commercial, official and bank secrets).

3.1.9. **Openness:** The Bank must be ready to openly communicate with stakeholders in order to clarify its position on given issues and to voluntarily disclose information on its financial and business activities.

3.1.10. **Security of information resources:** The Bank may use lawful facilities and methods to protect information constituting secrets of state, official and bank secrets and to control the use of insider information.

3.2. The internal procedures of information collection and preparation to disclosure are regulated by the Bank's bylaws.

3.3. In compliance with applicable Russian laws the Bank shall ensure the necessary level of information protection regarding secrets of state and commercial, official and bank secrets.

3.4. The Bank's executive bodies are responsible for the completeness and credibility of disclosed information on the Bank and its activities according to their competencies.

3.5. Information that is subject to disclosure shall be disclosed in the Russian language and may be additionally disclosed in other languages if so required.

4. MEDIA USED IN DISCLOSING INFORMATION

In accordance with the adopted information policy the Bank may disseminate information through media such as, but not limited to, the following:

– **Written documents**, prepared for the purposes of both internal and external communication, including, but not limited to: press announcements, press releases, brochures, presentations, magazines, news stories, press publications;

– **Verbal communication**, including, but not limited to: commentary, interviews, briefings, press conferences, in-house presentations or reports, speaking at various public events;

– **Audiovisual media**, including, but not limited to: video clips, corporate films, TV and/or radio appearances and interviews, presentation slides and/or other means of audiovisual presentation used at public conferences, meetings and other in-house and external events;

– **Electronic materials**, including, but not limited to: electronic mail, the Internet resources, corporate network resources;

– **Publicity materials** in all advertising media.

5. METHODS OF INFORMATION DISCLOSURE

Information subject to disclosure falls into two categories:

– mandatorily disclosable information using methods determined by applicable Russian laws;

– information subject to voluntary disclosure by all available means.

6. INFORMATION DISCLOSURE

6.1. The Bank must disclose information under Russian law, Moscow Exchange's listing rules and requirements of foreign regulatory bodies.

6.2. Mandatorily disclosable information consists of:

– the Bank's Charter with all amendments and supplements thereto registered as provided for by Russian laws;

– the Regulation on the Supervisory Board as amended and supplemented;

– the Regulation on the Audit Panel as amended and supplemented;

– the Regulation on the Management Board and Chairman of the Management Board as amended and supplemented;

– the Regulation on the General Shareholders' Meeting as amended and supplemented;

– other bylaws of the Bank governing its management bodies as amended and supplemented;

– banking licenses, licenses for stock market professional activity, other authorisations (licenses);

– details of the Bank's participation in the deposit insurance system of the Russian Federation;

– information on the persons who significantly (directly or indirectly) influence decisions of the Bank's management bodies;

– the Bank's insider information list;

– information disclosable in the process of the Bank's securities issuances;

– the Bank's prospectuses;

– the Bank's quarterly reports;

– material fact and insider information announcements as required by Russian laws;

– the Bank's annual report(s), annual accounting (financial) statements and other kinds of reports and statements required to be disclosed by the Bank by Russian laws;

– information on affiliates as required by Russian laws;

– information that may materially affect the price of the Bank's securities;

– information on convening and holding General Shareholders' Meetings;

– information on qualification and experience of Supervisory Board members, person acting as the sole executive body, its deputies, members of the collective executive body, Chief Accountant and Deputy Chief Accountant of the Bank;

– other documents and information required to be disclosed by Russian laws.

6.3. The list of disclosable information may vary depending on amendments made to Russian law and the regulations and requirements of the regulatory bodies.

6.4. All mandatorily disclosable information, documents and materials are published on the Bank's official website and on the website of an information agency accredited by the Bank of Russia for statutory disclosures and specified on the Bank's official website.

6.5. The Bank may disclose voluntarily the following:

– its strategic goals and objectives, market shares, investment projects, equity and borrowed capital, its and its subsidiary and controlled companies' financial performance and resources, industry data, and information about its products and services;

– additional quarterly reports on the operating results;

– its authorised persons' commentary upon information duly disclosed previously and upon its operating results;

– its history of development, topical presentations, managers' speeches and interviews, independent experts' opinions;

– its corporate governance documents;

– any other information deemed significant by it.

6.6. Voluntary disclosures may be initiated by the Bank's responsible subdivision to the following ends:

– improve the Bank's reputation and perception;

– mitigate or neutralise negative and/or controversial impact of external and internal factors;

– improve financial indicators,

– establish new business ties;

6.7. Any additional disclosures are subject to resolution of the Bank's governing bodies.

7. PERSONS AUTHORISED TO PROVIDE INFORMATION AND COMMENTS ON BEHALF OF THE BANK

7.1. The Chairman of the Management Board, the authorised representative of the subdivision responsible for dealing with mass media, and other authorised employees of the Bank (according to internal regulations) have the authority for external communications on issues related to the Bank's affairs.

7.2. The Chairman and members of the Supervisory Board may only comment on any matters reviewed at Supervisory Board meetings and other matters related to the Bank in their own name and only after this information is disclosed by it, and always subject to prior notification of the Chairman of the Management Board.

7.3. Should a person specified in clauses 7.1 or 7.2 unintentionally disclose any information disclosable in the form of a material fact announcement (or a press release) before such disclosure, such person shall promptly notify M&PRD and/or the Investor Relations Division for prompt disclosure of the material fact and/or the press release.

7.4. The persons specified in clauses 7.1 and 7.2 and all of the Bank's employees may not disclose information or give comments anonymously, i.e. where the specific disclosing person's identity and authority is unknown, without consultation with M&PRD.

8. PROVIDING ACCESS TO INFORMATION TO SHAREHOLDERS

8.1. The Bank shall place special emphasis on observing its shareholders' rights regardless of the size of their individual shareholdings.

8.2. In order to protect its shareholders' rights and interests, the Bank shall take measures to provide them information on it, such as:

– ensuring timely disclosure as required by Russian law;

– ensuring that shareholders have unimpeded access to its documents in compliance with the Federal Law "On Joint-Stock Companies", the Bank's Charter and Corporate Governance Code.

8.3. Forms of releasing information to shareholders:

– providing access to the documents listed in the Federal Law "On Joint-Stock Companies" for perusal at the premises of the Bank's executive body and/or by posting them on the Bank's official website (if disclosable under applicable laws);

– providing shareholders with copies of documents listed in the Federal Law “On Joint-Stock Companies” upon request, in the manner and on the conditions set out by the said law, the Bank’s Charter and this Information Policy.

8.4. The Bank shall observe its shareholders and its own rights and lawful interests in providing them with access to the documents listed in the Federal Law “On Joint-Stock Companies”, which include:

8.4.1. upon request of any shareholder:

– the Bank’s incorporation agreement; the Bank’s Charter with amendments and supplements duly registered under Russian law, evidence of the Bank’s state registration;

– a document evidencing state registration;

– resolutions on (additional) securities issues, amendments thereto, issue closing reports/ notices;

– its governing bodies’ bylaws approved by General Shareholders’ Meetings;

– its annual reports;

– its annual accounting (financial) statements and auditors’ reports thereon

– appraisers’ reports made as required by laws where the Bank buys back shares on a shareholder’s demand;

– documents obtained by it pursuant to chapter XI.1 of the Federal Law "On Joint-Stock Companies" (upon acquisition of more than 30 percent of its shares)

– minutes of General Shareholders’ Meetings;

– lists of its affiliates;

– Audit Panel reports;

– its prospectuses, quarterly reports and other documents containing information required to be published or disclosed otherwise by applicable laws;

– notices given to the Bank of the making of any shareholder agreements together with lists of the parties thereto;

– any judgments and rulings on disputes relating to the Bank’s incorporation, management thereof or participation therein, and related court documents, including arbitration courts’ resolutions instituting proceedings and admitting suits or petitions to change their cause of action or subject matter.

– information on its subsidiary and controlled companies (upon request of any shareholders);

8.4.2. upon request of any shareholders holding at least 1% of its voting shares:

– information on transactions (unilateral transactions) constituting major and/or interested party transactions under the Federal Law "On Joint-Stock Companies", in particular their type, subject matter, substance and value, execution date and lifespan, and whether made with prior consent or subsequent approval;

– minutes of Supervisory Board meetings;

– appraisers’ reports in respect of the underlying assets of any of the Bank’s major and/or interested party transactions within the meaning of the Federal Law "On Joint-Stock Companies".

8.4.3. upon request of any shareholders holding at least 25% of its voting shares:

– minutes of Management Board meetings;

– accounting documents;

8.5. Procedure and deadlines for providing Shareholders with access to, or copies of, the Bank’s documents.

8.5.1. The Bank shall provide its documents for perusal and/or deliver their copies upon a shareholder’s written demand compliant with applicable laws and regulations, including regulations of the Bank of Russia (a “Demand”).

8.5.2. A Demand must specify:

1) the shareholder’s surname, name and patronym (if any) or full corporate name and OGRN (another identification number, if a foreign legal entity) or other applicable identification details;

2) mailing address of the demanding party;

3) the list of the Bank’s documents to provide specifying their types and reference periods;

4) the form in which to provide the Bank’s documents;

5) if the Bank’s documents are to be provided in copies, a specific delivery method (personal delivery at the executive body’s premises, mail, courier, e-mail or another method allowed by the Bank’s charter or other bylaws);

6) if the Bank’s documents are to be provided in copies, whether they must be certified;

7) if the Bank’s documents are to be provided for perusal, whether they are intended to be copied;

8) its signing date and be signed by the entitled person;

i) further specifications of the Bank’s documents to provide and the form in which to provide them (where appropriate).

8.5.3. A Demand must attach:

1) the power of attorney of the shareholder's representative identifying both of them and executed as required by Russian laws or its duly certified copy (where applicable);

2) a statement of the shareholder's securities account issued by the relevant depository (where applicable) or a depository document evidencing the possession of the relevant shares and their number in the account (if titles to shares are recorded in a foreign depository). Such statement (foreign depository document) must confirm the number of shares held as at a date that is not earlier than seven business days before the Demand's date.

Any Demand signed by or for an entitled person whose shares were bought back as provided for by articles 76, 84.7 or 84.8 of the Law "On Joint-Stock Companies" and relating to such buyback must attach a statement confirming the number of shares held as at the date preceding such buyback;

3) a duly certified copy of the trust deed or a relevant extract therefrom confirming the asset manager's authority to exercise the relevant rights of the shareholder (where applicable);

4) an arbitration court's order appointing the Demand's signatory as receiver or a duly certified copy thereof (where applicable)

8.5.4. A Demand may be sent to the Bank by mail or delivered to its mail room at its executive body's registered address: 2 (bldg. 1) Lukov pereulok, Moscow 107045, Russia, or to its Corporate Secretary, or by any other means allowed by its Charter.

8.5.5. The Bank must provide the documents listed in a Demand compliant with cl. 8.5.2 and cl. 8.5.3 hereof within 7 (seven) business days of its presentation.

The Bank shall, within 7 (seven) business days of presentation of a Demand non-compliant with cl. 8.5.2 hereof and/or lacking any attachments listed in cl. 8.5.3 hereof, send a letter to its signatory specifying which information and documents are missing.

In this case, the time allowed for provision of documents shall start to lapse upon receipt of complete details required to be stated in a Demand and all requisite attachments.

8.5.6. Any shareholder perusing the Bank's documents may copy them independently, using their own technical devices, if notice of intention so to do is given in the Demand. Any documents provided for perusal and containing confidential information may only be copied independently with the Bank's consent.

8.5.7. If a significant volume of documents is to be copied pursuant to a Demand (concurrent Demands of one shareholder), their provision deadline may be extended by up to 20 (twenty) business days, of which the Bank shall notify the shareholder.

8.5.8 If any documents demanded by a shareholder contain state, banking and/or other legally protected secrets, the Bank shall provide extracts therefrom with relevant omissions and explanations as to what information was omitted and why it is deemed to represent legally protected secrets.

The Bank must black out any personal data other than surnames, names and patronyms in requested documents unless the relevant individuals consented to their disclosure to third parties.

8.5.9 The Bank's charge for provision of copy documents may not exceed the cost to it of making them. Copies of requested documents shall be accompanied by an invoice for the cost of making and, if the shareholder demands their delivery, forwarding them.

8.5.10. The Bank shall notify shareholders of the time and place of perusal by a telegram to the addresses stated in Demands or by other means ensuring confirmation of receipt.

8.5.11. The Bank shall keep a record of shareholders perusing its documents.

8.5.12. The list of information (materials) deliverable to persons entitled to participate in a General Shareholders' Meeting and the terms of access thereto shall be defined as provided for by Russian laws, the Bank's Charter and other bylaws, and by the Supervisory Board's resolution to convene such General Shareholders' Meeting.

8.6. Reasons for rejection of Demands.

8.6.1 The Bank may reject a Demand if at least one of the following conditions apply:

1) the requested document is freely available in the electronic form on the Bank's official website or has been disclosed as provided for by Russian securities laws;

2) the document has already been requested and duly provided within the last three years;

3) the document refers to past periods (more than three years old) unless relating to any outstanding transactions;

4) it states no business purpose where stating it is required by applicable laws or the stated purpose is unreasonable or obviously inconsistent with the scope and nature of requested documents;

5) it comes from a party that is not entitled by applicable laws to access the relevant category of documents;

6) the document refers to any periods other than those for which the shareholder has provided confirmation of shareholding such as a shareholder register account statement or a securities account statement, unless relating to any transactions outstanding within such confirmed shareholding period.

8.6.2 The Bank's notice of refusal to provide access to and/or make copies of documents must specify the reasons and be mailed to the address stated in the Demand or be delivered personally to the shareholder.

9. PROTECTION OF CONFIDENTIAL INFORMATION

9.1. Information constitutes a commercial or an official secret if it derives actual or potential commercial value from being unknown to third parties, cannot be freely accessed on legal grounds, and reasonable measures are taken to keep it confidential.

9.2. The Bank shall protect any state, commercial and banking secrets and other confidential information as provided for by Russian law and its bylaws.

9.3. Confidential insider information shall be protected in accordance with the Bank's bylaws dealing with confidentiality of insider information.

10. COMPLIANCE WITH THE INFORMATION POLICY

10.1. Those responsible for any violations of Russian laws, rules, regulations or this Information Policy that have caused damage to the Bank and/or its Stakeholders may be held liable in accordance with Russian laws.

10.2. The Information Policy shall be carried out by the Bank's executive bodies. The Supervisory Board shall control compliance with the Information Policy.

11. AMENDMENTS TO THE INFORMATION POLICY

11.1. The Information Policy shall become effective upon its approval by the Supervisory Board.

11.2. The Information Policy shall be revised when amendments are made to Russian laws or the Bank's Charter or if the Supervisory Board decides so.