REGULATIONS on the Procedure of Dealing with the Insider Information and Insiders of the International Investment Bank

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1. GENERAL PROVISIONS

1.1. Scope and basic provisions

- 1.1.2. The procedure for handling insider information and interacting with insiders of the International Investment Bank (hereinafter, the Procedure) establishes the basic requirements for organizing the handling of insider information and interaction with insiders of the International Investment Bank.
- 1.1.3. The Procedure has been developed based on the general requirements of the Regulation No. 596/2014 of the European Parliament and of the Council on market abuse and national legislations of IIB member states on countering unlawful use of insider information and market manipulation, as well as requirements of the Code [1]

- 1.1.4. The goal of the Procedure is to assist in forming an effective, transparent, and competitive financial market through the Bank's internal control measures aimed at preventing, identifying, and stopping abuse in the form of unlawful use and dissemination of insider information, manipulation of prices for the Bank's financial instruments, as well as financial instruments of third parties.
- 1.1.5. The Procedure applies to all employees of the Bank, as well as on the employees of its subsidiaries.
 - 1.1.6. The division initiating this document is Compliance Department.
 - 1.1.7. The division responsible for timely updating this document is Compliance Department.
- 1.1.8. The list of the Bank's existing regulations superseded by this Procedure is provided in Section 16.

1.2. Terms and definitions

Below is a list of terms and definitions used in this Procedure:

Term	Definition			
Insider Information	Accurate and specific information that was not disseminated or provided, which, if disseminated or provided, may have a significant influence on the prices for Financial Instruments issued by the Bank, and which is included in the list of the IIB's insider information.			
Insider	A person having access to Insider Information			
Publicly Available Information	Publicly available data and other information access to which is not restricted			
List of Insider Information	Categories of information classified as the Bank's insider information			
Unlawful Dissemination of Insider Information	Dissemination of Insider Information in violation of the requirements of this Procedure			
Audit Committee	IIB Audit Committee			
Secretary	Employee of the Bank acting as the responsible secretary of a Bank's committee			
The Bank's Council	Supreme collective management body of the IIB, performing general management of the Bank's operations			
The Bank's Financial Instrument	A security or derivative financial instrument issued by the Bank			

1.3. Abbreviations

The following abbreviations are used in this document:

Abbreviation	Meaning
BA	Board Administration
The Bank, IIB	International Investment Bank

CD	Compliance Department					
HRD	Human Resources Department					
SDFD Structured and Debt Finance Department						
FD	Finance Department					
LD	Legal Department					

2. INSIDER INFORMATION OF THE BANK

- 2.1. The Compliance Department shall work out and draw up the List of the Insider Information to be considered by the Management Board and approved by a Bank-wide Order.
 - 2.2. The IIB Insider Information shall not include:
- 2.2.1. the information that has become accessible for the general public, inter alia as a result of any distribution thereof;
- 2.2.2. the research, forecasts and appraisals performed on the basis of the Public Domain Information in relation to the Bank's Financial Instruments and also the recommendations and offers on the performance of operations involving the Financial Instruments.

3. DEALING WITH THE BANK'S INSIDERS

- 3.1. The CD shall compile the List of Categories of Persons Classified as Insiders, which shall be reviewed by the Board and approved by the Bank Administrative Order. The List of Categories of Persons Classified as Insiders is given in Appendix 1.
- 3.2. Based on the List of Categories of Persons Classified as Insiders and on information provided by structural divisions, the CD shall compile the list of the Bank's Insiders.
- 3.3. In order to identify legal entities to be included in the list of the Bank's Insiders or excluded from the list of Insiders, structural divisions whose competencies include initiating, signing, maintaining, and terminating contracts (agreements) under which the Bank's Insider Information is transferred/no longer transferred, shall notify the CD by corporate email not later than 1 (one) business day after the day of receipt of said information by the division.

The structural division shall submit the information to the CD, attaching a draft resolution to be passed by the CD Director on classifying the legal entity as an IIB Insider according to Appendix 3, and also attaching copies of contracts (agreements):

- 3.3.1. The FD shall submit information about external auditors;
- 3.3.2. The LD shall submit information about legal entities acting as the Bank's legal advisors;
- 3.3.3. The SDFD shall submit information about the Bank's external credit assessment institutions and arrangers of offerings of the Bank's Financial Instruments.
- 3.4. In order to identify natural persons to be included in the list of the Bank's Insiders or excluded from the list of Insiders, the HRD shall, not later than 1 (one) business day after the day of receipt of information about the Insider, notify the CD by corporate email, attaching a draft resolution to be passed by the CD Head on classifying the Individual as an IIB Insider according to Appendix 2, about the following Insiders of the Bank:

- members of the Board, upon their election/appointment, expiration of powers of said persons, or their early termination;
- unit heads, department heads and their deputies, upon their hiring, transfer, and/or dismissal.
- 3.5. In order to identify natural persons to be included in the list of the Bank's Insiders or excluded from the list of Insiders, the BA shall, not later than 1 (one) business day after the day of receipt of information about the Insider, notify the CD by corporate email, attaching a draft resolution to be passed by the CD Head on classifying the Individual as an IIB Insider according to Appendix 2, about the members of the Bank's Council, the Board of Directors 1, the Audit Committee, upon their election/appointment, expiration of powers of said persons, or their early termination.
- 3.6. In order to identify natural persons to be included in the list of the Bank's Insiders or excluded from the list of Insiders, Secretaries of the Bank's Committees whose competencies include handling Insider Information shall, not later than 1 (one) business day after the day of receipt of information about the Insider, notify the CD by corporate email about members of the Bank's Committees, upon their election/appointment, expiration of powers of said persons, or their early termination.
- 3.6.1. The CD, upon receiving information from the Secretaries, within 1 (one) business day from receiving the information, submit to the HRD, via corporate email, an inquiry for personal information about the employee.
- 3.6.2. The HRD shall, not later than the next business day from receiving the inquiry from the CD, send via corporate email a reply in the form of a draft resolution to be passed by the CD Head on classifying the natural person as an IIB Insider according to Appendix 2.
- 3.7. The HRD shall inform the CD via corporate email about the change of the name of the individual Insider.
- 3.8. The CD shall, upon receipt of information from structural divisions and Secretaries, within 5 (five) business days from receiving said information, include/exclude the person having access to the Bank's Insider Information in/from the list of the Bank's Insiders in accordance with Paragraphs 5.1–5.2 of this Procedure, or request additional information, including confirmation of grounds for including/excluding the said person in/from the list of the Bank's Insiders.
- 3.9. The Bank's structural divisions, when signing contracts with the Bank's employees and/or Insiders, shall include provisions on their observance of the applicable requirements of this Procedure (if applicable).

4. MAINTENANCE AND KEEPING OF THE LIST OF THE BANK'S INSIDERS

- 4.1. The List of the Bank's Insiders shall be maintained by the Compliance Department.
- 4.2. For the purposes of maintaining and keeping the List of Insiders, the obligations of the Compliance Department shall include:
 - the analysis of the information obtained from the structural units;
 - the maintenance of the List of Insiders;

Shall be applied if the Protocol on amending the Agreement on the Establishing the IIB and its Statutes dated May 8, 2014 becomes effective.

- a timely formation and forwarding to the Insiders of a Notice on adding a person to the List of Insiders (on removing a person from the List of Insiders) according to the form of Appendix No. 4 and in accordance with Section 5 of the Regulations;
 - the organization of the gathering of documents evidencing the receipt of the Notices;
- the formation and keeping of folders in respect to the persons included in the List of Insiders;
- the signing of a Resolution according to the form of Appendices No. 2 and No. 3 to these Regulations.
- 4.3. The List of Insiders shall be kept in electronic format in the file of the Compliance Department subject to the requirements of the Regulation [2] according to the form of Appendices No. 5.
- 4.5. When a person is added to the List of Insiders, an electronic folder shall be formed for that person; such folder shall contain:
 - the resolution on adding/removing the person to/from the List of Insiders;
- a copy of the Notice on adding the person to List of Insiders (removing the person from the List);
 - other documents (their copies).
- 4.6. The folders shall be kept by the Compliance Department for 5 years from the date of removing the person from the List of Insiders; the Lists of Insiders shall be kept constantly by the Compliance Department in accordance with the file nomenclatures of the units.

5. NOTICE OF INCLUSION/EXCLUSION OF A PERSON IN/FROM THE LIST OF INSIDERS

- 5.1. The CD shall prepare, sign, and submit the notice on inclusion/exclusion of a person in/from the List of Insiders, based on the form contained in Appendix 4² to this Procedure, to such person not later than 7 (seven) business days from the date of inclusion/exclusion of said person in/from the List of Insiders.
- 5.1.1. In respect of members of the Bank's Council, Board or Audit Committee, notices shall be provided with assistance from the BA, via agreed communication channels.
- 5.1.2. In respect of the Bank's corporate insiders, notices shall be provided with assistance from supervising divisions interacting with such legal entities (FD, LD, SDFD, etc.) via agreed communication channels.
- 5.1.3. In respect of the Bank's employee Insiders, notices shall be prepared on paper and provided by the CD via the electronic workflow system.
- 5.2. The notice shall be sent to the last address of the Insider known to the Bank. Preference shall be given to email addresses.
- 5.3. The Bank's Insiders receiving notices of their inclusion in the list of the Bank's Insiders shall notify the Bank about transactions with the Bank's Financial Instruments, conducted by them, within 10 (ten) business days after the respective transactions are conducted. Notices shall be prepared in a free from, specifying the Insider's full name, Individual Taxpayer Number (INN) (if applicable), the name of the Bank's Financial Instrument, the place of the transaction, the

² The reverse side of the Notice of inclusion of a person in the List of Insiders shall contain information about the requirements of this Procedure in respect of the Bank's Insiders or other additional information.

registration number of the Financial Instrument, its quantity, type of operation (purchase/sale), the transaction price, and the transaction date.

- 5.3.1. Paragraph 5.3 is not applicable to the members of the Bank's Council.
- 5.4. In case of change of one of the Bank's following details: the Bank's name, location, or other address at which the Bank receives mail correspondence, contact phone numbers, fax numbers, or email address, the CD shall notify all persons included in the list of Insiders about said changes within 5 (five) business days from the date of said changes, by publishing the said information on the Bank's official website.
- 5.5. At the request of a person included/excluded in/from the list of the Bank's Insiders, CD shall, not later than 7 (seven) business days from the Bank's receipt of the respective request, send (provide) to the said person a paper or an e-copy of the notice, signed by the CD Head.

6. PROHIBITION ON THE USE OF THE INSIDER INFORMATION

- 6.1. The Bank's employees and Insiders shall be prohibited from using the Insider Information:
- in order to perform operations involving the Financial Instruments of the Bank that are referred to in the Insider Information, for their own account or for account of a any third party, with the exception of the performance of operations within the framework of fulfilling that obligation to purchase or sale the Financial Instruments which has become due for fulfilment, if such obligation has arisen as a result of an operation performed before the Insider Information became known to the person;
- by way of communicating it to another person, except when such information is communicated to a person included in the List of Insiders in connection with his/her fulfilment of his/her official duties:
- by way of giving recommendations to any third parties or by obliging or otherwise inducing them to purchase or sell the Bank's Financial Instruments.

7. INSIDER INFORMATION ACCESS PROCEDURE

- 7.1. The Bank's Insiders shall access the Bank's Insider Information on the basis of the employment, commercial and other contracts concluded with them on the basis of the Council's, the Bank's member countries, the Board of Directors and the Management Board decisions.
- 7.2. The Bank's employees shall access the Insider Information of the Bank and its clients in compliance with the requirements of the Regulation [2].
- 7.3. The access to the Insider Information for any persons that are not Insiders of the Bank shall be formalized on the basis of an application to be forwarded to the Compliance Department; such application shall state the grounds for the necessity to obtain the specific information, the necessity to copy that information with the use of technical aids, and the necessity to disclose the information to any third parties, identifying the third parties for whose benefit the disclosure is intended.
- 7.4. According to the results of the consideration of the application mentioned in Clause 7.3. of these Regulations, the Compliance Department shall, within 3 working days after receipt thereof, adopt a resolution granting the person access or denying him/her access to the Insider Information requested by him/her, and the person that has submitted the application shall be given a notice in this respect.

8. RULES OF PROTECTING THE CONFIDENTIALITY OF THE INSIDER INFORMATION

- 8.1. The persons having access to the Insider Information and the persons that have obtained access to the Insider Information in accordance with Clause 7.3. of the Regulations shall be obliged:
- 8.1.1.to maintain the confidentiality of the Insider Information in accordance with the Regulation [2];
- 8.1.2.in case of loss of the status of a person having access to the Insider Information, to deliver to the Bank any media containing the Insider Information that are in his/her possession;
- 8.1.3. to immediately inform his/her immediate supervisor or a person being his/her deputy, the Bank in relation to legal persons, members of the Board, the Board of Directors, the Audit Committee about any loss or lack of documents and/or files containing the Insider Information, keys to safe deposits, passes, passwords or in case of detection of any unauthorized access to the Insider Information and so forth.
- 8.2. The Bank shall secure the required organizational and technical conditions for the observance of the established confidentiality regime by the persons having access to the Insider Information.
- 8.3. The Bank's employees shall be obliged in accordance with the Procedure [3] to notify the immediate supervisor and the Compliance Department of the Bank of any facts that have become known to them:
- 8.3.1. Concerning the Insider Information of the Bank that is not to be disclosed to them in accordance with their official duties but has become known to them, inter alia from the Bank's counterparties or any other persons;
- 8.3.2. Concerning any misuse, including the use for the benefit of the Bank's employees, the Bank's Insiders and their relatives, of the Bank's Insider Information.

9. ACTIONS CLASSIFIED AS MARKET MANIPULATION

- 9.1. The following actions, classified under this Procedure as market manipulation, shall be prohibited:
- 9.1.1. Wilful dissemination through mass media of knowingly false information causing the price, demand, supply, or volume of trading in the Bank's Financial Instrument to deviate from the level or stay at the level substantial different from that which would have been achieved if said information had not been disseminated.

The values of criteria of a substantial deviation of the price, demand, supply, or volume of trading in the Financial Instrument shall be determined by the CD, using its own means or by engaging external experts;

9.1.2 Conducting transactions with the Bank's Financial Instrument based on a prior arrangement between trading participants or persons at the expense or on behalf of whom said transactions are conducted, causing the price, demand, supply, or volume of trading in the Financial

Instrument to deviate from the level or stay at the level substantially different from that which would have been achieved if said transactions had not been conducted³;

- 9.1.3. Conducting transactions under which the parties' obligations are performed at the expense and on behalf of one person, causing the price, demand, supply, or volume of trading in the Bank's Financial Instrument to deviate from the level or stay at the level substantially different from that which would have been achieved but for said transactions:
- 9.1.4. Making applications at the expense and on behalf of one person, resulting in two or more contradicting applications during organized trading, where the buying price of the Bank's Financial Instrument is equal to or exceeds the selling price of the same Financial Instrument if, based on said applications, transactions were conducted causing the price, demand, supply, or volume of trading in the Bank's Financial Instrument to deviate from the level or stay at the level substantially different from that which would have been achieved but for said transactions;
- 9.1.5. Multiple, during one trading day at organized trading, transactions at the expense or on behalf of one person based on applications having upon their making the highest buying price or the lowest selling price of the Bank's Financial Instrument, causing their price to deviate substantially from the level which would have been achieved but for said transactions, for the purpose of making subsequent reverse transactions at the expense or on behalf of the same person, at such prices, and further making of such reverse transactions;
- 9.1.6. Multiple, during one trading day at organized trading, transactions at the expense or on behalf of one person with the purpose of misleading in respect of the price of the Bank's Financial Instrument, causing the price of the Financial Instrument to stay at a level differing substantially from that which would have been achieved but for said transactions;
- 9.2. Actions defined in Paragraphs 9.1.2–9.1.6 of this Procedure shall not be classified as market manipulation if they are aimed at:
- 9.2.1. Maintaining prices for the Bank's Financial Instruments in connection with the offering and circulation of Financial Instruments and are conducted by trading participants under a contract with the issuer or a person liable under the Financial Instruments;
- 9.2.2. Maintaining prices, demand, supply, or volume of trading in the Bank's Financial Instruments and are conducted by trading participants under a contract where one of the parties is the trade organizer.

10. UNLAWFUL DISSEMINATION OF INSIDER INFORMATION

- 10.1. The Bank's Insiders and employees may disseminate Insider Information only in compliance with the requirements of this Procedure.
- 10.2. In disseminating Insider Information, the Bank's employees shall adhere to the requirements of the legislations of countries where such information is disseminated or the Bank's Financial Instruments are traded/circulated.
- 10.3. The unlawful dissemination of Insider Information also includes recommendations and advice based on Insider Information in transactions with the Bank's Financial Instruments, given to persons who are not Insiders.

11. INTERNAL CONTROL MEASURES

Paragraphs 9.1.2, 9.1.3, and 9.1.4 shall apply to organized trading where transactions are conducted based on applications addressed to all trading participants if information about the applying persons and persons on behalf of which the applications were made is not disclosed to trading participants

- 11.1. The Compliance Department shall implement the following internal control measures for countering the misuse of the Insider Information and market manipulation:
- 11.1.1. Directing inquiries to the Bank's structural units in relation to the deals involving the Bank's Financial Instruments that have been accomplished by the Insiders;
- 11.1.2. Considering the Insiders' Notices on the operations involving the Bank's Financial Instruments performed;
- 11.1.3. Forming, and controlling the completeness and relevance of, the List of the Insider Information:
- 11.1.4. Exercising control over the maintenance of the List of Insiders, the adding/removal of Insiders to/from the List of Insiders, and their notification on such adding to/removal from the List of Insiders:
- 11.1.5. Exercising control over the compliance with the requirements of these Regulations by the structural units dealing with the Insider Information and by the Insiders.
- 11.2. The Compliance Department shall annually report to the Management Board of the Bank on the implementation of the internal control measures for countering the misuse of the Insider Information and market manipulation including the results of complaint investigations carried out by CD according to Paragraph 8.3. of this Procedure.

12. RESPONSIBILITY

- 12.1. The Bank's Insiders shall be responsible for complying with the requirements of this Procedure.
- 12.2. The Bank's Insiders breaching the requirements of this Procedure may be subjected to measures provided for the requirements of the IIB's regulations, employment, civil, and other contracts signed with them, as well as of decisions of the Bank's authorized bodies and its member states.

13. THE BANK'S RECEIPT OF NOTICES OF INCLUDING A THIRD PARTY IN THE LIST OF INSIDERS

- 13.1. Upon receiving a notice of the IIB's inclusion of any third party in the list of Insiders, the CD may initiate the signing of the said notice, request that the said person provide grounds for their inclusion in the list of Insiders, determine the list of employees having access to the Insider Information of the person providing the notice, or send to the third party information about transactions with that person's financial instruments.
- 13.2. If necessary, in addition to the actions mentioned in Paragraph 13.1, the CD and the Bank's structural divisions may initiate other actions, including mutually beneficial exchange of information with national regulators, needed to prevent market manipulation, unlawful use and dissemination of the third party's Insider Information.

14. FINAL PROVISIONS

14.1. In case of amendments to the Bank's regulations or the Agreement Establishing the IIB and its Charter, this Procedure, along with amendments hereto, shall be applicable to the extent that

does not contradict the newly approved regulations, the Agreement Establishing the IIB, or its Charter.

15. LIST OF DOCUMENTS REFERRED TO HEREIN

- 1. Code of Conduct of the International Investment Bank (OND-32), approved by Order No. 100 dated 7/11/2013;
- 2. Regulation on the Procedure for Ensuring Protection of Confidential information of the International Investment Bank (REG-27), approved by Order No. 116 dated 28/5/2010;
- 3. Procedure for Receiving and Handling Complainant Reports in the International Investment Bank (PCD-69), approved by Order No. 50 dated 17/5/2016.

16. LIST OF THE BANK'S REGULATIONS SUPERSEDED BY THIS DOCUMENT

This document supersedes the Regulations on the Procedure of Dealing with the Insider Information and Insiders of the International Investment Bank (Appendix 1), the List of Categories of Persons Classified as IIB Insiders (Appendix 3), approved by Order No. 65 dated 20/5/2014.

to the Regulations on the Procedure of Dealing with the Insider Information and Insiders of the International Investment Bank

List of Categories of Persons Classified as the Bank's Insiders

- 1. Members of the Bank's Council;
- 2. Members of the Bank's Board of Directors;
- 3. Members of the Bank's Management Board;
- 4. Members of the Audit Committee;
- 5. Members of the Bank's committees;
- 6. Block Heads;
- 7. The Bank's Department Heads and their Deputies,;
- 8. The Bank's External Auditors;
- 9. Legal advisors;
- 10. External credit assessment institutions assigning ratings to the Bank and its Financial Instruments;
- 11. Arrangers of the Bank's financial instrument offerings.

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Appendix No. 2 to the Regulations on the Procedure of Dealing with the Insider Information and Insiders of the International Investment Bank

Resolution on adding/removing a person to/from the List of Insiders (for individuals)

Surname, forename and patronymic (if applicable) of the Insider	
Date of birth of the Insider	
Place of birth of the Insider	
Position of the Insider in IIB (if applicable)	
Name of the Insider's Organization (if applicable)	
Position in the Insider's Organization (if applicable)	
Category of Insider (e.g. members of the Bank's Council, block heads and others)	
Type of the event (to be stated: "adding to the List of Insiders" or "removing from the List of Insiders")	
Grounds for adding/removing the person to/from the List of Insiders	
Date of adding the person to the List of Insiders (removing the person from the List of Insiders) – to be completed by the Compliance Department	

Head of the Compliance Department ______ Forename, Patronymic, Surname

Appendix No. 3 to the Regulations on the Procedure of Dealing with the Insider Information and Insiders of the International Investment Bank

Resolution on adding/removing a person to/from the List of Insiders (for entities)

201_	
Full legal name of the legal entity (for a not-for-profit organization – name)	
Taxpayer Identification Number of the legal entity (if applicable)	
Location of the legal entity or mailing address	
Category of Insider (e.g. external auditors, legal advisors and others)	
Type of the event (to be stated: "adding to the List of Insiders" or "removing from the List of Insiders")	
Grounds for adding/removing the entity to/from the List of Insiders	
Date of adding the legal entity to the List of Insiders (removing the legal entity from the List of Insiders) – to be completed by the Compliance Department	

Head of the Compliance Department ______ Forename, Patronymic, Surname

Appendix No. 4 to the Regulations on the Procedure of Dealing with the Insider Information and Insiders of the International Investment Bank

Dated	201	No.	Addressee:
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NOTICE on adding a person to the List of Insiders (on removing a person from the List of Insiders)

No. I. Information on IIB 1.1 Full business name	NIa	I Information	an IID
1.2 Taxpayer Identification Number of the Organization 1.3 Location of the Organization 1.4 Phone number of the Organization 1.5 Fax number of the Organization 1.6 E-mail 1.7 Surname, forename and patronymic of the contact person 1.8 Surname, forename and patronymic of the contact person 1.9 Surname, forename and patronymic of the linsider 2.1 Surname, forename and patronymic of the linsider 2.2 Date of birth of the Insider 2.3 Place of birth of the Insider 2.4 Name of the Organization No. IIIb. Information on the person included in the List of the Organization's Insiders (for legal entities) 1.1 Full business name of the Insider 2.2 Taxpayer Identification Number of the legal entity (if applicable) 1.1 Information on the grounds for forwarding the Notice 3.1 Grounds for forwarding the Notice 3.2 Date of adding to/removing from the List of Insiders 3.3 Grounds for adding/removing the person to/from the List of Insiders	No.		
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1.5. Fax number of the Organization			
1.6. E-mail grigory.gruzinov@iibbank.com 1.7. Surname, forename and patronymic of the contact person No. IIa. Information on the person included in the List of the Organization's Insiders (for natural persons) 2.1 Surname, forename and patronymic of the Insider 2.2 Date of birth of the Insider 2.3 Place of birth of the Insider 2.4. Name of the Organization 2.5. Position in the organization IIb. Information on the person included in the List of the Organization's Insiders (for legal entities) 2.1. Full business name of the Insider 2.2. Taxpayer Identification Number of the legal entity (if applicable) No. III. Information on the grounds for forwarding the Notice 3.1 Grounds for forwarding the Notice 3.2. Date of adding to/removing from the List of Insiders 3.3. Grounds for adding/removing the person to/from the List of Insiders			
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to/from the List of Insiders			
to/from the List of Insiders	3.3.	Grounds for adding/removing the person	
	3.4.		

Head of the Compliance Department ______ Forename, Patronymic, Surname

The reverse side of Appendix No.4* to the Regulations on the Procedure of Dealing with the Insider Information and Insiders of the International Investment Bank

About the requirement to the Bank's Insiders in accordance with the Regulations on the Procedure of Dealing with the Insider Information and Insiders of the International Investment Bank:

- 1. In accordance with section 6 you are prohibited to use inside information:
- in order to perform operations involving the Financial Instruments of the Bank that are referred to in the Insider Information, for your own account or for account of a any third party, with the exception of the performance of operations within the framework of fulfilling that obligation to purchase or sale the Financial Instruments which has become due for fulfilment, if such obligation has arisen as a result of an operation performed before the Insider Information became known to the person;
- by way of communicating it to another person, except when such information is communicated to a person included in the List of Insiders in connection with his/her fulfilment of his/her official duties;
- by way of giving recommendations to any third parties or by obliging or otherwise inducing them to purchase or sell the Bank's Financial Instruments.
- 2. According to clause 5.3. you shall notify the Bank about transactions with the Bank's Financial Instruments, conducted by you within 10 (ten) business days after the respective transactions are conducted. Notices shall be prepared in a free from, specifying the Insider's full name, Individual Taxpayer Number (INN) (if applicable), the name of the Bank's Financial Instrument, the place of the transaction, the registration number of the Financial Instrument, its quantity, type of operation (purchase/sale), the transaction price, and the transaction date.
- 3. According to clause 12.2. you may be subjected to measures provided for the requirements of the IIB's regulations, employment, civil, and other contracts signed with them, as well as of decisions of the Bank's authorized bodies and its member states in case you breach the requirements of this Procedure.

The legislation of some IIB member countries provides for criminal liability for the misuse of insider information and market manipulation.

* Paragraphs 2 and 3 are not applicable to the members of the Bank's Council.

The List of the Bank's Insiders

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	name/legal	on/	Insider	birth	birth	(entit	ation address	under which
	name	Enti				y)		Insider
		ty						(entity) is
								included in
								List of
								Insiders

(the continuation)

Date of	Date of	Registration	Number	Date of	Grounds for	Delivery (with
receiving Resolution on adding	adding to List of	date of Notice	of Notice	dispatch of Notice on adding to List	adding to List of Insiders	signature/mark from post)
to List of Insiders	Insiders			of Insiders		

(the continuation)

Date of	Date of	Registration	Number of	Date of	Grounds for	Delivery (with
receiving	removing	date of Notice	Notice	dispatch of	removing	signature/mark
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Resolution	from List of			Notice on	from List of	from post)
on removing	Insiders			removing	Insiders	
from List of				from List of		
Insiders				Insiders		
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(the continuation)

Date of surname/legal name change	Previous surname/legal name	Comments