

**Approved
by the Board of Directors
SIBUR Holding PJSC
Minutes No. 210 dated June 23, 2018**

**INSIDER INFORMATION
POLICY
OF PJSC SIBUR HOLDING**

(Revision No. 8)

**City of Tobolsk
2018**

1. GENERAL PROVISIONS.

1.1 Purposes of the Policy

This Policy has been developed in accordance with Federal Law No. 224-FZ “On Combating Unlawful Use of Insider Information and Market Manipulation and on Amending Certain Legislative Acts of the Russian Federation” dated 27 July 2010, the subordinate legislation adopted by federal executive authorities of the Russian Federation under it, the Articles of Association of PJSC SIBUR Holding (the “Company”), the Provisions on the Company’s Board of Directors and other Company’s internal documents for the purposes of securing fair pricing of securities and financial instruments, equal treatment of investors as regards the timeframes and the scope of information they receive, promoting the trust of investors and preventing abuse in the form of unlawful use of insider information and (or) market manipulation.

This Policy further ensures regulation in connection with the issuance of Eurobonds which are admitted to trading at the Irish Stock Exchange (the “Eurobonds”).

1.2 Scope of the Policy

This Policy governs the use of the Company’s insider information and determines the following:

- the list of Insiders and Insider Information;
- the rights and obligations of the Company’s Insiders;
- the procedure of access to Insider Information, the rules for safeguarding its confidentiality and monitoring compliance with legislation;
- the procedure for transactions with the Company’s financial Instruments by Insiders.

1.3 Terms and definitions

1.3.1. **Access to Insider Information** means examination or the possibility of examination by certain persons of the information included in the list of insider information.

1.3.2. **Law on Insider Information** means Federal Law No. 224-FZ “On Combating Unlawful Use of Insider Information and Market Manipulation and on Amending Certain Legislative Acts of the Russian Federation” dated July 27, 2010.

1.3.3. **Directive on market manipulation** means Directive 2003/6/EC of the European Parliament of 28 January 2003, Directive 2014/57/EU of the European Parliament and of the Council of 16 April 2014, Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014, and the Market Abuse Regulation (February 2016) issued by the Central Bank of Ireland.

1.3.5. **Insider Information** means exact and specific information which has not been disseminated or provided (including information constituting trade secrets, business secrets, bank secrecy, secrecy of communication (concerning the information regarding money transfers by post) and other secrets protected by law), the dissemination or provision of which may have significant influence on the prices of financial instruments, foreign currency and (or) Company’s products, or one or more financial instruments, foreign currency and (or) products) and which classifies as information included in the corresponding list of insider information as indicated in Appendix 1 to this Policy. The list of Insider Information is to be disclosed in the Internet as required by the legislation.

Insider Information shall not include the following:

- 1) information which has become known to the public at large, including through it being disseminated;
- 2) research, forecasts and valuations conducted based on publicly available information with respect to financial instruments, foreign currency and (or) the Company's products, as well as recommendations and (or) proposals with respect to transactions with financial instruments, foreign currency and (or) the Company's products.
- 1.3.6. **Insiders** means persons who have access to Insider Information and are mentioned in Chapter 2 of this Policy.
- 1.3.7. **Controller** means a person whose obligations include monitoring compliance with the requirements of the Law on Insider Information and subordinate legislation adopted under it, as well as with foreign laws and regulations.
- 1.3.8. **Market Manipulation** means intentional dissemination through the media, including electronic media, public information and telecommunications networks (including the Internet) of deliberately false information or concluding transactions with Financial Instruments, Eurobonds, or other intentional acts that are prohibited by laws and regulations governing the issues of abuse in the form of unlawful use of Insider Information and (or) market manipulation, provided such acts have resulted in the price, demand, supply or volume of trades in Financial Instruments and Eurobonds deviating from the level or remaining at the level which was significantly different from the level which would have been set without the above illegal acts.
- 1.3.9. **Company** means PJSC SIBUR Holding.
- 1.3.10. **Trade Organizers** means stock exchange, foreign exchange, commodity exchange or another institution which in accordance with Russian legislation or applicable foreign legislation carries out activities aimed at organizing trade in financial instruments, foreign currency and (or) products.
- 1.3.11. **Provision of Information** means actions aimed at receiving of information by a specific range of people in compliance with legislation.
- 1.3.12. **Dissemination of Information** means actions:
- a) aimed at receiving information by the public at large or at transferring information to the public at large, including through the disclosure of such information in accordance with Russian legislation regarding securities and the Directive on market manipulation;
 - b) relating to publishing information in the media, including electronic media, and information and telecommunications networks (including the Internet) the access to which is not limited to a certain range of people;
 - c) relating to the information being disseminated through electronic and information and telecommunications networks (including the Internet) the access to which is not limited to a certain range of people;
- 1.3.13. **Company's Management Organization** means a contracted legal entity which carries out the powers and authorities of the Sole Executive Body of the Company.
- 1.3.14. **Financial Instrument** means securities (shares and (or) bonds) of the Company which the Company has placed in accordance with Russian legislation and which are admitted to organized trading.

2. COMPANY'S INSIDERS.

2.1. Insiders include the following persons:

- 2.1.1. the Company;

- 2.1.2. persons who have Access to Insider Information of the Company under agreements concluded with the Company, including auditors (auditing organizations), appraisers (legal entities with which appraisers have concluded employment contracts), professional participants in the Securities market, credit institutions and insurance companies;
- 2.1.3. persons holding at least twenty five percent (25%) of the Company's voting shares and persons who have Access to Insider Information through their ownership of shares (ownership interests) in the authorized capital of the above persons under applicable legislation or constituent documents;
- 2.1.4. members of the Board of Directors of the Company;
- 2.1.5. members of the Management Board of the Company (of the Management Organization of the Company);
- 2.1.6. the Sole Executive Body of the Company (including the Management Organization, a manager or a temporary sole executive body);
- 2.1.7. members of the Audit Committee of the Company;
- 2.1.8. information agencies authorized to conduct Dissemination or Provision of Information of the Company;
- 2.1.9. persons assigning ratings to the Company, as well as its Financial Instruments and Eurobonds;
- 2.1.10. individuals who have Access to Insider Information of the Company under employment agreements and (or) contracts for services which have been concluded with respective persons, as well as employees who have Access to Insider Information of the Company;
- 2.1.11. other persons who are categorized as Insiders by the Law on Insider Information and the Directive on market manipulation;
- 2.2. the Company shall maintain the list of Insiders based on the categories of persons mentioned in clause 2.1 of this Policy, irrespective of the fact whether such a person has the right of access to Insider Information of the Company on a regular basis or on a temporary basis.
- 2.3. The Company shall notify persons included in the list of the Company's Insiders that they have been included in such a list or excluded from it in accordance with the procedure prescribed by law.

3. RIGHTS AND OBLIGATIONS OF THE COMPANY'S INSIDERS.

3.1 Rights of the Company's Insiders

- 3.1.1. Members of the Board of Directors, members of the Management Board, a person who exercises the functions of the Sole Executive Body (a Sole Executive Body or members of the collective executive body of the Management Organization) and members of the Company's Audit Committee have the right of Access to any Insider Information of the Company.
- 3.1.2. Insiders who are not indicated in Clause 3.1.1 of this Policy have the right of Access to Insider Information which they require to perform their obligations as expressly provided for by Russian legislation, employment contracts or services contracts concluded with the Company, or the Company's internal documents.

3.2 Obligations of the Company's Insiders

- 3.2.1. The Company's Insiders must comply with the procedure for concluding transactions with the Company's Financial Instruments and Eurobonds as established by this Policy, as well as with other requirements and obligations established with respect to them by this Policy, other internal documents of the Company and applicable legislation.

- 3.2.2. The Company's Insiders must make every possible effort to safeguard and prevent unauthorized use or dissemination of Insider Information.
- 3.2.3. Insiders' obligations with respect to specific Insider Information envisaged by this Policy shall terminate starting from the date when specific Insider Information is disclosed in accordance with the procedure and in compliance with the requirements of applicable legislation.
- 3.2.4. Once an employment contract or another contract concluded with the Company is terminated, the powers are terminated or Insiders resign from the Company's governing bodies, the Company's Insiders must abide by the restrictions envisaged by Clause 3.3 of this Policy.
- 3.2.5. If a person who has Access to Insider Information loses his status, such a person, within two business days, shall hand over to the Company the information media which are at his/her disposal and which contain Insider Information.

3.3 The Company's Insiders are prohibited from:

- a) disclosing the Company's Insider Information which is (has become) known to them;
- b) using the Company's Insider Information for the purposes that do not relate to their professional activity and (or) for the purposes for which contracts/agreements with the Company do not provide;
- c) using the Company's Insider Information in their personal interests or in the interests of third parties;
- d) using Insider Information for the purpose of transactions with Financial Instruments and Eurobonds at their own expense or at the expense of a third party, except within the framework of fulfillment of an obligation which has become due, provided such an obligation resulted from a transaction which had been performed before the person learned such Insider Information;
- e) using Insider Information by way of its transfer to another person, except for cases when the information was transferred to a person included in the list of Insiders in connection with the fulfillment of statutory obligations or in connection with the fulfillment of work duties or the performance of a contract;
- f) using Insider Information by way of issuing recommendations to third parties, obliging or otherwise encouraging them to acquire or sell Financial Instruments and Eurobonds; and
- g) carrying out acts referring to Market Manipulation.

3.4. Persons who are not Insiders but who have been unintentionally granted Access to Insider Information shall:

- a) cease familiarization with Insider Information;
- b) take exhaustive measures to safeguard the confidentiality of Insider Information which has become known to them;
- c) prevent such Insider Information from being used and (or) disseminated;
- d) immediately notify the Company of the Insider Information having been examined.

4. SPECIFIC ASPECTS OF TRANSACTIONS WITH THE COMPANY'S FINANCIAL INSTRUMENTS BY INSIDERS.

- 4.1. The list of the Company's Insider Information is set out in Appendix 1 to this Policy.
- 4.2. Insiders must notify the Company and, if required by legislation, other authorized persons of transactions with the Company's Financial Instruments and Eurobonds. The procedure of notification shall be determined by applicable legislation and this Policy.
- 4.3. Insiders shall submit to the Company their notices of transactions they have performed within ten (10) business days of the date of the respective transaction in a format as set out in Appendix 3 to this Policy.

- 4.4. An Insider who has received a request from the Company or a competent governmental authority must send a notice of the transactions performed to a respective addressee within ten (10) business days of the date of receipt of a corresponding request (order, instruction).
- 4.5. The Company shall submit the list of Insiders (updated list of Insiders) to the Bank of Russia further to its request and to Trade Organizers through which Transactions with Financial Instruments are being performed or other authorized persons under applicable laws in accordance with the procedure established by the regulation of the Bank of Russia.

5. SPECIFIC ASPECTS OF TRANSACTIONS WITH EUROBONDS BY INSIDERS.

- 5.1 The Company, as well as its Insiders, shall comply with the Directive on market manipulation and applicable laws.
- 5.2. The Company shall provide the list of insiders further to a request of a foreign competent authority.
- 5.3. The general rules and prohibitions for Insiders are as follows:
 - 5.3.1. Insiders shall comply with the prohibition of transactions with Eurobonds during the 'Black out' period:
 - a) the period of sixty (60) days immediately preceding the preliminary announcement of annual performance results of the Company or publication of the annual financial reporting of the Company and of the Company's subsidiaries, which annual results and financial reporting may influence the price of Eurobonds.
 - b) the period of thirty (30) days immediately preceding the preliminary announcement of quarterly results of the Company and of the Company's subsidiaries, which quarterly results and financial statements may influence the price of Eurobonds.
 - 5.3.2. Insiders may not use Insider Information in transactions with Securities that are placed on the Irish Stock Exchange. If an Insider has doubts as to whether a certain prohibition applies to him/her or regarding any other issues, he/she must consult with the Company.

6. PROCEDURE OF ACCESS TO INSIDER INFORMATION. SAFEGUARDING CONFIDENTIALITY OF INSIDER INFORMATION.

- 6.1. The Company may introduce special procedures of Access to Insider Information of the Company aimed at preventing unlawful use of the Company's Insider Information, including as follows:
 - 6.1.1. restrict Access to specific Insider Information for the Company's employees;
 - 6.1.2. establish access control for persons (including the Company's employees) to certain premises the Company occupies (including on days-off);
 - 6.1.3. determine places and sources of storage of Insider Information and grant Access to specific Insider Information at certain places, from certain media or at certain sources of access;
 - 6.1.4. allow familiarization with the information constituting Insider Information solely at certain places;
 - 6.1.5. introduce procedures for safeguarding workplaces and places where documents are kept from free access and unobstructed observation;
 - 6.1.6. use protection systems for information and technical systems which safeguard against any loss of Insider Information and unauthorized access to such information, including:
 - a) delimitation of users' rights of access to information resources of automated and information systems of the Company's corporate Intranet containing Insider Information

(ensured by systemic delimitation means, the use of individual identification tags and passwords, electronic keys, etc.);

b) carrying out administrative and technical measures aimed at ruling out unauthorized Access to Insider Information: blocking a user's access to the system when attempted unauthorized access is identified;

c) ruling out unauthorized interconnection of peripheral equipment and installation of software products;

d) ruling out transmission of Insider Information through public networks (including the Internet);

e) using certified cryptographic tools for safeguarding (encrypting) information in order to safeguard Insider Information which is transmitted through communication channels;

f) monitoring compliance by the Company's employees with the established procedure for the use of means of communications for business purposes.

6.2 Access to Insider Information for persons other than those mentioned in sub-clause 3.1.1 of this Policy shall be granted only after such persons are included in the list of the Company's Insiders and receive an official notification of being included in it.

7. MONITORING COMPLIANCE WITH THE LEGISLATION REGARDING INSIDER INFORMATION. COMPANY'S CONTROLLER.

7.1 The Company shall appoint a person who carries out the functions of the Company's Sole Executive Body to monitor compliance with the requirements of the Law on Insider Information and subordinate legislation adopted under it. Another structural unit (officer) of the Company or of the Company's Management Organization may be appointed as a controller as required by applicable laws.

7.2. Compliance with the legislation shall be monitored by way of conducting comprehensive or selective inspections with respect to the following:

- whether the Company maintains a list of Insiders (including whether it is lawful to include or exclude persons in the list of the Company's Insiders);
- whether the persons have been timely notified of being included in (excluded from) the list of the Company's Insiders;
- whether the list of the Company's Insiders has been timely provided to the trade organizers through which transactions with Financial Instruments and Eurobonds are performed, as well as to the Bank of Russia further to its request and to other authorized persons.

7.3. The Controller shall:

- consider messages and applications sent to the Company and relating to unauthorized use of Insider Information and Market Manipulation;
- monitor the Company's compliance with this Policy;
- carry out inspections further to the identified facts of unauthorized use of Insider Information and Market Manipulation;
- monitor corrective actions in respect of the detected violations and observance of measures to prevent similar violations in the Company's further operations;
- notify the Company's Board of Directors of detected violations of the rules established by the Policy;
- monitor the Russian legislation regarding Insider Information and its practical application, put forward the proposals to enhance the setting and implementation of controls at the Company over compliance with the legislation;
- undertake measures aimed at ruling out unauthorized access of third parties to the documents he/she keeps; and
- carry out any other functions required to meet the requirements of the legislation.

8. LIABILITY.

8.1 Liability of the Company's Insiders

The Company's Insiders shall assume liability for unlawful use of Insider Information and may be subjected to disciplinary, administrative, criminal law or civil law liability under Russian legislation and foreign laws and regulations, as well as in accordance with the terms and conditions of a contract with the Company.

**Appendix No. 1
to the Insider Information Policy of
PJSC SIBUR Holding**

**LIST OF
INSIDER INFORMATION OF PJSC SIBUR HOLDING**

The Company's Insider Information includes information on the following:

1. Convocation and holding of a General Meeting of Shareholders of the Company, including agenda, date of the meetings, date of preparing a list of persons entitled to attend a General Meeting, as well as decisions approved by a General Meeting of Shareholders of the Company.

2. Agenda of a Meeting of the Company's Board of Directors and decisions made thereby.

3. Non-approval by the Company's Board of Directors of the following decisions to be approved in accordance with federal laws and the applicable legislation:

on convocation of an Annual (Regular) General Meeting of Shareholders of the Company and other decisions relating to preparation, convocation and holding of an Annual (Regular) General Meeting of Shareholders of such a Company;

on convocation (holding) of or refusal to convene (hold) an Extraordinary General Meeting of Shareholders of the Company at the request of the Audit Committee (internal auditor) of the Company, auditor of the Company or shareholder(s) owning at least 10% of the voting shares (participants holding, in aggregate, at least one tenth of the total number of participants' votes) of the Company;

on putting or refusal to put suggested issues on the agenda of a General Meeting of Shareholders of the Company and on putting or refusal to put nominees on the list of candidates to be voted and elected to a relevant body of the Company that are proposed by shareholder(s) owning, in aggregate, at least two per cent of the voting shares of the Company;

on establishment of a Sole Executive Body of the Company at two consecutive meetings of the Company's Board of Directors or within two months of the date when powers and authorities of the previously established Sole Executive Body of the Company are terminated or expired in the case provided for by Clause 6, Article 69 of Federal Law No. 208-FZ dated December 26, 1995 "On Joint-Stock Companies";

on early termination of powers and authorities of the Sole Executive Body of the Company at two consecutive meetings of the Company's Board of Directors in the case provided for by Clause 7, Article 69 of the Federal Law "On Joint-Stock Companies";

on convocation (holding) of an Extraordinary General Meeting of Shareholders of the Company when the number of members of the Company's Board of Directors is less than the number constituting the quorum for holding a Meeting of the Company's Board of Directors;

on establishment of a temporary Sole Executive Body of the Company and holding an Extraordinary General Meeting of Shareholders of such a Company in order to consider early termination of powers and authorities of its Sole Executive Body or the Managing Organization (Manager) of the Company and establishment of a new Sole Executive Body of the Company or on delegation of powers and authorities of the Sole Executive Body to the Managing Organization (Manager) of the Company in the event when the Company's Board of Directors (Supervisory Board) decides on suspending powers and authorities of its Sole Executive Body or its Managing Organization (Manager);

on recommendations relating to a voluntary, including competitive, or obligatory offer received by the Company and including evaluation of a proposed price of acquired issue-grade securities and possible changes in their market price following such acquisition, estimation of plans of the person submitting the voluntary, including competitive, or obligatory offer in relation to the Company, including in relation to its employees.

4. Submission by the Company of an application for including into the Unified State Register of Legal Entities of records relating to reorganization, winding-up or liquidation of the Company, and in the case when an authority performing state registration of legal entities decides on refusal to enter the specified records – information on making such a decision.

5. Appearance of an entity controlled by the Company, which entity is of material importance therefor, and on termination of grounds for control over such an entity.

6. Appearance of a person controlled by the Company and termination of grounds for such control.

7. Making a reorganization or liquidation decision by an entity controlling the Company, an entity under control of and of material importance to the Company, or by a person providing security for the Company's bonds, if the terms and conditions of applicable laws are complied with in relation to the person providing such security and (or) the bonds for which it provides such security.

8. Submission by an entity controlling the Company, an entity under control of and of material importance to the Company, or by a person providing security for the Company's bonds, if the terms and conditions of applicable laws are complied with in relation to the person providing such security and (or) the bonds for which it provides such security, of an application for entering into the Unified State Register of Legal Entities of records relating to reorganization, winding-up or liquidation of the specified entities.

9. Appearance of an entity controlling the Company, an entity under control of and of material importance to the Company or a person providing security for the Company's bonds, if the terms and conditions of applicable laws are complied with in relation to the person providing such security and (or) the bonds for which it provides such security.

10. Acceptance by an arbitration court of an application for recognizing the Company, its controlling entity, an entity under control of and of material importance to the Company, or a person providing security for the Company's bonds, if the terms and conditions of applicable laws are complied with in relation to the person providing such security and/or the bonds for which it provides such security, as bankrupts, as well as decisions made by an arbitration court on recognition of the specified persons as bankrupts or introduction of any of the bankruptcy procedures in relation thereto or termination of bankruptcy proceedings relating to such persons.

11. Filing against the Company, its controlling entity, an entity under control of and of material importance to the Company, or against a person providing security for the Company's bonds, if the terms and conditions of applicable laws are complied with in relation to the person providing such security and (or) the bonds for which it provides such security, a claim, the amount of which is 10 or more percent of the book value of the assets of said entities as of the closing date of the last reporting period preceding filing the claim or another claim, satisfaction of which may, in the Company's opinion, materially affect the business situation of the Company or the specified entities.

12. A date of identifying persons entitled to enjoy the rights attributed to the Company's issue-grade securities, including a date of closing the list of persons entitled to participate in a General Meeting of Shareholders of the Company, subject to compliance with the terms and conditions of applicable laws.

13. The Company's competent bodies shall make the following decisions, subject to compliance with the terms and conditions of applicable laws:

placing the Company's issue-grade securities;

the start date for placing the Company's issue-grade securities;

suspending placement of the issuer's issue-grade securities;

rejecting placement (additional placement) of the issuer's issue-grade securities;

full (partial) discharge of obligations to pay the principal, unpaid interest and financial penalties for default on subordinated bonds (for issuing lending institutions).

14. Completing placement of the Company's issue-grade securities, subject to compliance with the terms and conditions of applicable laws.

15. Sending (submission) by the Company of an application for state registration of issuance (additional issuance) of issue-grade securities, registration of the securities prospectus, state registration of a bond program, state registration of changes to a decision on issuance (additional issuance) of issue-grade securities and (or) the prospectus thereof, state registration of changes to a bond program, the terms and conditions of the issuance (additional issuance) and (or) the prospectus thereof under the bond program, and state registration of the placement report on issuance (additional issuance) of issue-grade securities, subject to compliance with the terms and conditions of applicable laws.

16. Sending (submission) by the Company of a notice on results of issuance (additional issuance) of issue-grade securities, subject to compliance with the terms and conditions of applicable laws.

17. Decision of an arbitration court on recognizing the issuance (additional issuance) of the Company's issue-grade securities as invalid.

18. Redemption of the Company's issue-grade securities, subject to compliance with the terms and conditions of applicable laws.

19. Accrued and (or) paid distributions on the Company's issue-grade securities, subject to compliance with the terms and conditions of applicable laws.

20. Conclusion by the Company of an agreement with a Russian trade organizer on putting the Company's issue-grade securities on the list of securities admitted to organized trading by a Russian trade organizer and an agreement on listing the Company's issue-grade securities at the Russian stock exchange.

21. Conclusion by the Company of an agreement on putting the Company's issue-grade securities or securities of a foreign issuer confirming rights to the issue-grade securities of the Russian Company on the list of securities admitted to trading on a foreign organized (regulated) financial market, and of an agreement with a foreign stock exchange on listing of such securities at a foreign stock exchange.

22. Putting the Company's issue-grade securities or securities of a foreign issuer confirming rights to the issue-grade securities of the Russian Company on the list of securities admitted to trading on a foreign organized (regulated) financial market, and relevant delisting of such securities, as well as listing and delisting of such securities at a foreign stock exchange.

23. Conclusion by the Company of an agreement on maintenance (stabilization) of prices for the Company's issue-grade securities (securities of a foreign issuer confirming rights to the issue-grade securities of the Russian Company), the terms and conditions of such an agreement, and termination thereof, subject to compliance with the terms and conditions of applicable laws.

24. Submission by the Company of an application to obtain a permit of the Central Bank of the Russian Federation for placement of and (or) organization of transacting in issue-grade securities outside the Russian Federation.

25. Failure to perform the Company's obligations to holders of its issue-grade securities.

26. Acquisition by a person of the right or termination of a person's right to directly or indirectly (through persons under its control), independently or together with other persons associated with it by a property trust deed and (or) a simple partnership and (or) agency or shareholders' and (or) other agreement, the subject matter of which is exercising the rights confirmed by the shares (ownership interests) in the Company, exercise a certain number of votes attributed to the voting shares (ownership interests) constituting the authorized capital of the Company, if the specified number of votes is five percent or becomes more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total votes attributed to the voting shares (ownership interests) constituting the authorized capital of the Company.

27. Receipt by the Company, in accordance with Chapter XI.1 of the Federal Law "On Joint-Stock Companies", of a voluntary, including competitive, or obligatory offer on acquisition of its issue-grade securities or amendments to such offers.

28. Receipt by the Company, in accordance with Chapter XI.1 of the Federal Law “On Joint-Stock Companies”, of a notice on the right to demand redemption of the Company’s issue-grade securities or receipt of a call for redemption of the Company’s issue-grade securities.

29. Detection of mistakes in the Company’s accounting (financial) statements disclosed earlier, if such mistakes may significantly affect the price of the Company’s issue-grade securities.

30. A transaction made by the Company or a person providing security for the Company’s bonds, if the terms and conditions of applicable laws are complied with in relation to the person providing such security and (or) the bonds for which it provides such security, the amount of which is 10 percent or more of the book value of the Company’s or the said person’s assets as of the closing date of the last reporting period preceding conclusion of the transaction.

31. A transaction concluded by an entity controlling the Company or an entity under control of and of material importance to the Company, which is recognized as a major transaction in accordance with the legislation of the Russian Federation.

32. A non-arm’s length transaction concluded by the Company, if the amount of this transaction is as follows:

the book value of the Company’s assets as of the closing date of the last reporting period preceding the decision of the Company’s competent governing body to approve conclusion of the transaction, and if no decision to approve conclusion of this transaction was made, as of the closing date of the last reporting period preceding the Company’s conclusion of this transaction, is a maximum of RUB 100 bn, – more than RUB 500 mln, or two or more percent of the book value of the Company’s assets as of the date indicated in this subclause;

the book value of the Company’s assets as of the closing date of the last reporting period preceding the decision of the Company’s competent governing body to approve conclusion of the transaction, and if the Company’s competent governing body did not make a decision to approve conclusion of this transaction, as of the closing date of the last reporting period preceding the Company’s conclusion of this transaction, is more than RUB 100 bn, – one or more percent of the book value of the Company’s assets as of the date indicated in this subclause.

33. Changes in composition and (or) amount of the subject of pledge on the Company’s collateralized bonds, subject to compliance with the terms and conditions of applicable laws, and in the event of a change in the composition and (or) amount of the subject of pledge on the Company’s bonds with mortgage collateral – information on such changes, if they are caused by replacement of any mortgage claim that constitutes mortgage coverage of bonds, or replacement of other property constituting the mortgage cover of bonds, the value (monetary value) of which is 10 percent or more of mortgage coverage of the bonds.

34. A change in the value of assets of a person providing security for the Company’s bonds, if the terms and conditions of applicable laws are complied with in relation to the person providing such security and (or) the bonds for which it provides such security, which change constitutes 10 percent or more, or any other significant, in the Company’s opinion, change in the business situation of such a person.

35. Acquisition by the Company of the right or termination of the Company’s right to directly or indirectly (through persons under its control), independently or together with other persons associated with it by a property trust deed and (or) a simple partnership and (or) agency and (or) shareholders’ and (or) other agreement, the subject matter of which is exercising the rights confirmed by the shares (ownership interests) in an entity, the issue-grade securities of which are admitted to organized trading or the value of which assets exceeds five billion Rubles, exercise a certain number of votes attributed to the voting shares (ownership interests) constituting the authorized capital of the said entity, if the specified number of votes is five percent or becomes more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total votes attributed to the voting shares (ownership interests) constituting the authorized capital of such an entity.

36. Acquisition by a person of the right or termination of a person's right to directly or indirectly (through persons under its control), independently or together with other persons associated with it by a property trust deed and (or) a simple partnership and (or) agency and (or) shareholders' and (or) other agreement, the subject matter of which is exercising the rights confirmed by the shares (ownership interests) in an entity providing suretyship with respect to the Company's bonds, subject to compliance with the terms and conditions of applicable laws with respect to the person providing such suretyship and (or) the bonds in relation to which it provides such suretyship, exercise a certain number of votes attributed to the voting shares (ownership interests) constituting the authorized capital of such an entity, if the specified number of votes is five percent or becomes more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total votes attributed to the voting shares (ownership interests) constituting the authorized capital of such an entity.

37. Conclusion by the Company, its controlling entity or an entity under its control of an agreement providing for an obligation to purchase issue-grade securities of the said Company, subject to compliance with the terms and conditions envisaged by applicable laws.

38. Receipt, suspension, renewal, re-registration, revocation (cancellation) or termination on other grounds of validity of the Company's permit (license) for a certain activity of material financial and economic significance for the said Company.

39. Expiry of powers and authorities of the Sole Executive Body and (or) members of the collective executive body of the Company.

40. Change in the size of the ownership interest in the authorized (share) capital of the Company and entities under its control and of material importance therefor:

held by persons being members of the Board of Directors (Supervisory Board) and the collective executive body of the Company and a person holding the office (performing the functions) of the Sole Executive Body of the Company;

held by persons being members of the Board of Directors (Supervisory Board) and the collective executive body of the Company's Managing Organization and a person holding the office (performing the functions) of the Sole Executive Body of the managing organization, should powers and authorities of the Sole Executive Body of the Company be delegated to the Managing Organization.

41. Creation and (or) termination of the Company bondholders' right to call on early redemption by the Company of the Company's bonds owned thereby, subject to compliance with the terms and conditions of applicable laws.

42. Engagement or replacement of an organization providing the Company with services of an intermediary while the Company performs its obligations under the bonds or other issue-grade securities, including its name, location and remuneration for rendered services, as well as changes in such information.

43. A dispute relating to establishment, management of or participation in the Company, if a decision on the specified dispute may significantly affect the price of the Company's issue-grade securities.

44. Lodging against a person providing security for the Company's bonds, if the terms and conditions of applicable laws are complied with in relation to the person providing such security and (or) the bonds for which it provides such security, a claim relating to performance of the obligations under such bonds.

45. Placement outside the Russian Federation of bonds and other financial instruments certifying borrowing obligations, which are performed at the Company's expense.

46. Acquisition (disposal) of voting shares (ownership interests) in the Company or securities of a foreign issuer confirming the rights to the voting shares in the Company by the Company and (or) entities under its control other than those being brokers and (or) trustees and concluding a transaction on behalf of themselves but at the expense of a client not being the Company and (or) an entity under its control.

47. Information sent or provided by the Company to a relevant authority (relevant organization) of a foreign country, foreign stock exchange and (or) other organizations under any foreign legislation for the purposes of its disclosure or provision to foreign investors in relation to placement or circulation of the Company's issue-grade securities outside the Russian Federation, including through acquisition of a foreign Company's securities to be placed (placed) in accordance with foreign legislation, if such information may significantly affect the price of the Company's issue-grade securities.

48. Information being a component of the Company's annual accounting (financial) reporting and consolidated financial reporting and included in the auditors' opinions prepared for this reporting.

49. A component of the Company's interim accounting (financial) reporting and consolidated financial reporting for the reporting period for the three, six or nine months of the current year and included in the auditors' opinions prepared for this reporting, and a component of the interim financial reporting and consolidated financial reporting prepared in accordance with the International Financial Reporting Standards (IFRS) in effect in the Russian Federation; and if an audit is conducted on them, included in the respective auditors' opinions.

50. A component of the terms and conditions for placing issue-grade securities determined by a decision approved by the Company's competent body on issuance (additional issuance) of securities, the approved bond program, and the approved terms and conditions for issuance (additional issuance) of bonds under the bond program, subject to compliance with the terms and conditions of applicable laws, except for information previously disclosed according to the requirements of the Russian Federation law on the securities market.

51. Contained in the report (notice) of the results of issuance of issue-grade securities approved by the Company's authorized body, subject to compliance with the terms and conditions of applicable laws, excluding information previously disclosed according to the requirements of the legislation.

52. Contained in the securities prospectus approved by the Company's authorized body, excluding information previously disclosed according to the requirements of the legislation.

53. Contained in quarterly reports signed by the Company's authorized persons, excluding information previously disclosed according to the requirements of the legislation.

54. Contained in the Company's annual reports signed by the Company's authorized persons, excluding information previously disclosed according to the requirements of the legislation.

55. About a strategic partnership or other agreement concluded by the Company, if conclusion of the said agreements may significantly affect the price of the Company's issue-grade securities.

56. About the holding and agenda of a general meeting of the Company's bondholders, as well as about the decisions adopted by the general meeting of the Company's bondholders, subject to compliance with the terms and conditions of applicable laws.

57. About the notice sent (given) by the Company containing information on the representative of bondholders, subject to compliance with the terms and conditions of applicable laws.

58. About the interim relief applied by a court, a court of arbitration or government executive body with respect to money or other property owned by the Company, its controlling entity, or an entity controlled by the Company and of material importance to it, or the entity providing security for the Company's bonds, subject to compliance with the terms and conditions of applicable laws with respect to the entity providing the said security and (or) bonds for which it provides this security, comprising at least 10 percent of the book value of the assets of said entities as of the closing date of the last reporting period preceding the application of interim relief.

59. About initiation of criminal proceedings (served to the Company by the preliminary investigation agency or investigative authority) against a member of the Company's Board of

Directors, the Company's Sole Executive Body, its controlling entity, an entity controlled by the Company and of material importance to it, or an entity providing security for the Company's bonds, if initiated with respect to such entity providing this security and (or) bonds for which it provides this security, subject to compliance with the terms and conditions of applicable laws.

Appendix No. 2
to the Insider Information Policy of
PJSC SIBUR Holding

NOTICE OF INCLUSION ON (EXCLUSION FROM) THE LIST OF INSIDERS

No. DD.MM.YY - E

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No.	I. Information on the Company	
1.1	Full name	Public Joint-Stock Company SIBUR Holding
1.2	TIN	7727547261
1.3	OGRN	1057747421247
1.4	Registered address	Block 1, № 6, building 30, Eastern Industrial Area, Tobolsk, Tyumen Region, 626150
1.5	Correspondence address	16, Krzhizhanovskogo St., Bldg. 1, Moscow, 117218, Russia
No.	II. Information on the person included on (excluded from) the list of Insiders	
	For insiders which are legal entities	
2.1	Full name	
2.2	TIN	
2.3	OGRN	
2.4.	Registered address	
2.5.	Correspondence address	
	For individual insiders	
2.1.	Full name	
2.2.	Date of birth	
2.3.	Place of birth	
No.	III. Information on the grounds for the notice	
3.1	Grounds for the notice	Inclusion on the insider list
3.3	Date of inclusion on the insider list	

3.4	Grounds for inclusion on the insider list	The person has Access to Insider Information by virtue of Clause __, Article 4 of the Law ¹ .
No.	IV. Contact details	
4.1	Telephone number	+7 (495) 777-55-00 (ext. 64-44)
4.2	Fax number	+7 (495) 777-55-00
4.3	E-mail	cherkasoas@sibur.ru

Please note that, once a person is included on the Company's insider list, the said person will be subject, as an Insider, to certain restrictions, obligations and liability determined in the Insider Information Policy of PJCS SIBUR Holding, the Law on Insider Information¹ and other applicable legislation.

Title

signature

(initials, surname)

¹ Federal Law No. 224-FZ "On Combating Unlawful Use of Insider Information and Market Manipulation and on Amending Certain Legislative Acts of the Russian Federation" dated 27 July 2010 (hereinafter, the "Federal Law").

**Appendix No. 3
to the Insider Information
Policy of PJSC SIBUR Holding**

NOTIFICATION OF A TRANSACTION PERFORMED BY THE INSIDER

1. Full name of the individual insider/Full company name of the insider – legal entity	
2. Type and details of the document certifying the identity of the individual insider/TIN, OGRN of the insider – legal entity	
3. Registered address of the individual insider/insider – legal entity	
4. Full company name of the entity, on the insider list of which the insider has been included	
5. Date of transaction	
6. Type of transaction	
7. Amount of transaction	
8. Place of executing the transaction (name of the trade organizer or over-the-counter market)	
9. Type, class (category), series of the Financial Instrument or Eurobond	
10. Issuer's full name	
11. State registration number of the issue of the Financial Instrument or Eurobond	
12. Price per the Financial Instrument, Eurobond	
13. Amount of Financial Instruments, Eurobonds	

Date: _____

_____ / _____ / _____

Signature

Full name