

**Approved by
the Board of Directors
PJSC SIBUR Holding
Protocol No. 220 dated April 29, 2019.**

**REGULATION
ON MATERIAL NON-PUBLIC INFORMATION
PJSC SIBUR HOLDING**

(Revision No. 9)

**Tobolsk
2019**

1. GENERAL PROVISIONS

This Regulation has been developed in accordance with the requirements of Russian legislation in the field of countering the unlawful use of Material Non-Public Information and market manipulation, the Articles of Association of PJSC "SIBUR Holding" (hereinafter referred to as the "Company"), Regulations on the Company Board of Directors and other internal documents of the Company.

This revision of the regulation comes into force on May, 1 2019.

The Regulation shall govern the following:

1. The procedure for the Company's insiders to carry out transactions and other actions aimed at acquiring, alienating, otherwise changing the rights to financial instruments (shares/bonds) and goods of the Company and the Issuers whose insider is the Company, as well as actions related to the commitment to perform the specified actions, including issuing applications (giving instructions);
2. The procedure and terms of disclosure of the Material Non-Public Information, the list of which is determined by the Company.
3. The procedure for providing by insiders of information about their operations.
4. Rules of access, protection and internal control to identify and prevent misuse of the Material Non-Public Information and/or market manipulation.

TERMS AND DEFINITIONS

Material Non-Public Information shall mean accurate and specific information that has not been disseminated (including information that constitutes a trade secret and other secrets protected by law), and the distribution of which may have a significant impact on the prices of the Company's financial instruments.

Material Non-Public Information is defined in the Company Material Non-Public Information List.

The Material Non-Public Information List is approved by the person acting as the sole executive body of the Company and is subject to disclosure on the Internet on the Company's website.

The Material Non-Public Information shall not include:

- 1) information made available to the unlimited circle of persons, including as a result of their distribution;
- 2) studies, forecasts and evaluations carried out on the basis of publicly available information, as well as recommendations and/or proposals for carrying out operations with financial instruments of the Company and/or the Issuers, in the Insider List in which the Company is included.

Insiders shall mean persons who have access to the Material Non-Public Information specified in Chapter 2 of this Regulation or included in the Company's Insider List.

Controller shall mean a person who is responsible for monitoring compliance with the requirements of the Law on Material Non-Public Information and regulations adopted in accordance with it, as well as foreign regulations.

Company shall mean PJSC SIBUR Holding.

Operations with financial instruments shall mean transactions and other actions aimed at acquiring, alienating, otherwise changing the rights to financial instruments (shares/bonds) and goods of the Company and the Issuers whose insider is the Company, as well as actions related to the commitment to perform the specified actions, including issuing applications (giving instructions).

Trade Organizers shall mean -stock exchange, commodity exchange or other organization that, in accordance with the laws of Russia or applicable foreign legislation, organizes trading in financial instruments and/or goods (including PJSC Moscow Exchange).

Information distribution shall mean the- following actions:

1. aimed at obtaining information by an indefinite circle of persons or at transmitting information to an indefinite circle of persons, including through its disclosure in accordance with the Russian legislation and the European Union on securities;
2. related to the publication of information in the media, including electronic, information and telecommunication networks, access to which is not limited to a certain circle of people (including the Internet);
3. related to the dissemination of information through electronic, information and telecommunication networks, access to which is not limited to a certain circle of people (including the Internet).

Related Parties of an **individual** shall mean the spouse, parents, children of the Company's Insiders.

Managing Organization of the Company shall be SIBUR LLC or another legal entity acting on the basis of an agreement on the transfer of powers of the Company sole executive body.

Financial Instrument shall mean shares and/or bonds of the Company or other Issuers whose insider is the Company, as well as derivative financial instruments (agreements concluded in respect of shares and/or bonds of the Company) admitted to organized trading.

Issuer shall mean another legal entity, executive body of the government, a local government body whose list of Insiders includes PJSC SIBUR Holding. The Issuer List, the insider list of which includes the Company, is published on the Company's website on the Internet.

2. INSIDERS OF THE COMPANY

The following persons are considered to be the Insiders of PJSC SIBUR Holding:

1. persons having access to the Company Insider Information on the basis of contracts concluded with the Company, including auditors (audit organizations), appraisers (legal entities

with which the appraisers have entered into employment contracts), professional participants in the securities market, credit organizations, and insurance organizations;

2. persons who have the right, directly or indirectly (through persons controlled by them), to dispose of at least 25 percent of the votes in the supreme management body of the Company, as well as persons who, by virtue of holding shares in the Company authorized capital, have access to the Insider Information based on federal laws constituent documents or internal documents of the Company;
3. members of the Board of Directors of the Company;
4. members of the Management Board of the Company;
5. sole executive body of the Company (including the Managing Organization);
6. members of the Company's Audit Commission;
7. information agencies;
8. persons who assign ratings to the Company, as well as the Company's financial instruments;
9. individuals who have access to the Company Material Non-Public Information on the basis of employment and/or civil law contracts concluded with the Company, Managing Organization and other persons who have entered into a relevant agreement with the Company and are its Insiders;
10. persons who have sent and/or have access to information on the preparation and/or sending of a voluntary, mandatory or competing offer to purchase securities, notification of the right to demand redemption of securities or a requirement to repurchase securities of the Company, including a bank or other a credit institution that provided a bank guarantee, appraisers (legal entities with which appraisers have entered into employment contracts);

The Company Insider List includes the persons specified in Sub-Clauses 1, Sub-Clauses 3-9 of Clause 2 of this Regulation, regardless of whether such person has the right of access to the Company's Material Non-Public Information on a regular or temporary basis.

The Company is entitled to request from legal entities that are the Company's Insiders a list of employees who have access to the Company Material Non-Public Information on the basis of labor and/or civil law contracts concluded with such legal entities.

The Company maintains the Insider List of in electronic format in the form developed by the trade organizer.

The Company notifies the persons included in the Company's Insider List about their inclusion in or exclusion from such list by sending a notice in electronic form not later than seven (7) business days from the date of the corresponding grounds.

The Company transfers to the trade organizer, through which operations with financial instruments (including stocks and bonds) of the Company are carried out, at its request the Insider List.

3. OBLIGATIONS OF THE COMPANY'S INSIDERS.

1. The Company's Insiders shall comply with the requirements established for them by this Regulation and the Russian (applicable) legislation.
2. The Company's Insiders are obliged to take all measures within their reasonable control to protect and prevent the unlawful use and dissemination of the Material Non-Public Information.
3. The Insiders' obligations with respect to the specific Material Non-Public Information provided for in this Regulation shall cease upon the disclosure of the specific Material Non-Public Information by the Company in accordance with the requirements of the Russian legislation.
4. The Company shall have the right to request from Insiders in electronic form information on the operations performed by them with the Company's securities and on the conclusion of contracts that are derivative financial instruments and the price of which depends on such securities. The Insiders shall send information to the Company in electronic format within ten (10) business days from the date of the request receipt in the form approved in Appendix No. 2 hereto.

The Company's Insiders shall not:

- transfer, in any form, the Company's Material Non-Public Information known to them to third parties, with the exception of cases of transferring this information to a person included in the Insider List, in connection with the performance of duties established by law, or in connection with the performance of job duties or the contract execution;
- use the Company's Material Non-Public Information for purposes not related to their professional activities and/or purposes not provided for by the terms of contracts/agreements concluded with the Company;
- use the Material Non-Public Information to carry out transactions with financial instruments at their own expense or at the expense of a third party, with the exception of the performance within the framework of the obligation fulfillment, the fulfillment of which has occurred, if such an obligation arose as a result of an operation completed before the Material Non-Public Information became known to such person;
- perform other actions related to market manipulation in accordance with the Russian legislation.

4. FEATURES OF INSIDERS' OPERATIONS WITH FINANCIAL INSTRUMENTS.

The Company determines the conditions for transactions by insiders and persons related to them with the financial instruments of the Company and other Issuers, of which the Company is an insider:

1. Operations with financial instruments are prohibited from the first business day of the new year until the publication of the Company annual financial statements and other Issuers whose insider is the Company prepared in accordance with International Financial Reporting Standards (IFRS) or the Russian Accounting Standards (RAS), depending on what date comes first.
2. Operations with financial instruments are prohibited from the first business day of each quarter until the publication of the Company's quarterly report.

The Company and individuals that have labor and/or civil-law contracts with the Company or the Governing Organization, when included by other Issuers in their own Insider List, must comply with the applicable laws of the country of such Issuer and the Trade Organizer.

5. ORDER OF ACCESS TO MATERIAL NON-PUBLIC INFORMATION.

When concluding a contract with a person who gains access to the Material Non-Public Information on the basis of a contract being entered into, the Company informs that person in electronic form that it will be included in the Insider List, as well as about the requirements of this Regulation and liability for illegal use of the Material Non-Public Information.

Access to the Material Non-Public Information is effected after sending the official notice of its inclusion in the Insider List in electronic form and is terminated after exclusion from the Insider List.

Access to the Material Non-Public Information shall be effected in accordance with the procedure established in accordance with measures taken in the Company to protect information confidentiality.

6. ORDER AND TERM OF DISCLOSURE OF THE MATERIAL NON-PUBLIC INFORMATION NOT INCLUDED IN THE LIST APPROVED BY THE BANK OF RUSSIA

The Company discloses information related to the Material Non-Public Information on its website and/or through the information disclosure system on the securities market on the Company's website on the Internet.

The Company discloses the Material Non-Public Information, the list of which is determined by the Central Bank of Russia in the manner and time specified by it.

The Company discloses the Material Non-Public Information, the list of which is determined by the Company itself on its website on the Internet within 10 business days from the date of the event.

7. PREVENTION, IDENTIFICATION AND PREVENTION OF THE INCORRECT USE OF THE MATERIAL NON-PUBLIC INFORMATION

The sole executive body of the Company appoints a structural subdivision (official) responsible for monitoring compliance with the requirements of the Russian legislation in the area of countering the unlawful use of the Material Non-Public Information and market manipulation — the Controller.

Monitoring compliance with the legislation requirements is carried out by conducting comprehensive or random checks for:

1. maintaining by the Company the Insider List (including the legality of inclusion or exclusion of persons into the Company Insider List);
2. timeliness of notifying persons of inclusion (exclusion from) in the Company Insider List;
3. timeliness of the transfer of the Company Insider List to the trade organizers, as well as to the Bank of Russia at their request and to other authorized persons;
4. timely disclosure of the Material Non-Public Information.

The Controller:

1. considers appeals to the Company related to the use of the Company Material Non-Public Information (including those that cause a significant change in price, demand, supply or trading volume in a financial instrument);
2. monitors the Company compliance with this Regulation;
3. checks whether the Insiders comply with the terms of transactions with financial instruments;
4. carries out checks on the facts of unlawful use of the Material Non-Public Information within 5 business days from the date of receipt of information about such facts;
5. controls the violations elimination;
6. makes proposals on how to improve the organization in the Company of control over counteraction to the unlawful use of the Material Non-Public Information;
7. creates working groups (which may include persons who are not insiders) to effectively carry out their functions.

If any cases of unlawful use of the Material Non-Public Information are identified, the Controller shall inform the Sole Executive Body of the Company within 3 business days from the date of the audit end.

8. RESPONSIBILITY OF COMPANY'S INSIDERS

The Company Insiders are liable for the unlawful use of the Material Non-Public Information and may be brought to disciplinary, administrative, criminal or civil liability in accordance with the Russian Federation legislation and foreign regulatory acts, as well as the terms of the agreement with the Company.

Appendix No. 1
To the Regulation on Material Non-Public Information of PJSC SIBUR Holding

**NOTIFICATION OF PERSONS ON THEIR INCLUSION IN (EXCLUSION FROM) THE INSIDER LIST No. yy
m.dd.- F.**

____.____.20__

No.	I. Information about the Company	
1.1	Full name	Public Joint Stock Company SIBUR HOLDING
1.2	INN	7727547261
1.3	OGRN (Primary State Registration Number)	1057747421247
1.4	Location	626150, Tyumen Region, Tobolsk, territory of the East Industrial District, Block 1, No. 6, Building 30.
1.5	Mailing address	117218, Russia, Moscow, Krzhizhanovskogo Street 16, Building 1
No.	II. Details of the person included in the Insider List (excluded from the Insider List)	
	For insiders - legal entities	
2.1	Full name	
2.2	INN	
2.3	OGRN (Primary State Registration Number)	
2.4	Location	
2.5	Mailing address	
	For insiders - individuals	
2.1.	Full name of the person	
2.2.	Date of birth	
2.3.	Place of birth	
No.	III. Details of the notice grounds	
3.1	Grounds for notice	Inclusion in the Insider List
3.3	Date of person inclusion in the Insider List	
3.4	Grounds for including a person in the Insider List	A person has access to the Material Non-Public Information on the basis of Clause __ of Article 4 of the Law ¹ .
No.	IV. Contact details	
4.1	Telephone number	(495) 777-55-00 (ext. 64-44)
4.2	Fax number	(495) 777-55-00
4.3	Email	cherkasoovas@sibur.ru

Please note that after a person is added to the Company's Insider List, this person, as an Insider, is subject to restrictions, responsibilities and responsibilities stipulated by the Regulation "On Material Non-Public Information of PJSC "SIBUR Holding", the Law on Material Non-Public Information and ¹other applicable legislation.

title
signature
(initials,
surname)

¹ Federal Law No. 224-FZ dated 27 July 2010 "On Countering the Unlawful Use of Material Non-Public Information and Market Manipulation and on Amendments to Certain Legislative Acts of the Russian Federation" (hereinafter referred to as the "Federal Law".)

**Appendix No. 2
to the Regulation
on material non-public information
PJSC SIBUR Holding**

NOTIFICATION BY THE INSIDER ABOUT THE OPERATION

1	Full name of Insider-individual/ full company name of insider-legal entity	
2	Operation date	
3	Type of transaction (operation)	
4	Amount of transaction (operation)	
5	Place of the transaction (name of trade organizer or over-the-counter market)	
6	Type, category (type), series of the Financial Instrument	
7	Full corporate name of the Issuer	
8	State registration number of the financial instrument issue	
9	Price of one financial instrument	
10	Number of financial instruments	

Date: _____ / _____ / _____

Signature

Full name