



Public Joint-Stock Company NOVOLIPETSK STEEL

Approved by:

Corporate Secretary

signature

V. Loskutov

October 14, 2021

**REGULATION
on access to insider information, related
confidentiality rules and internal control over
compliance**

P CG-307-0040-2021

(Replacing P CG-307-0040-2020 Regulation on access to insider information,
related confidentiality rules and internal control over compliance approved on 23.03.2020)

The document was introduced by order No. 1-1136-P-ОД dated October 14, 2021

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1. SCOPE OF APPLICATION

This Regulation on access to insider information, confidentiality rules and internal control over compliance therewith (hereinafter, the Regulation) has been developed in accordance with the applicable Russian law On counteraction to unauthorized use of insider information and to market manipulation (2.1.1, 2.1.3, 2.1.6) and the Company internal documents, including the Regulation on insider Information of the Company [1] (**Appendix J**), and take into account European Union regulations and law of Great Britain.

The Regulation establishes the procedure of access to insider information, confidentiality rules in relation to insider information, and the rules of internal control to prevent, detect and stop illegal use of insider information and (or) market manipulation.

All the issues not covered by this Regulation shall be governed by the applicable law, Company's Charter and other internal documents.

In case certain provisions of the Regulation come into conflict with any amendments made in the applicable legislation, such provisions of the Regulation shall be rendered void; in this case the Company shall be guided by the effective Russian legislation until the Regulation has been modified accordingly.

2. REFERENCE DOCUMENTS ¹

2.1. This regulation references the following documents:

2.1.1. Federal Law No. 224-FZ "On counteraction to unauthorized use of insider information and to market manipulation, and on Amendment of Individual Acts of Law of the Russian Federation";

2.1.2. Regulation of Bank of Russia No. 5720 dated 02.02.2021 -U "On procedure for notifying persons on inclusion and exclusion from insider list";

2.1.3. Regulation of Bank of Russia No. 5222 dated 01.08.2019 -U "n requirements to internal control rules for prevention, detection and stopping illegal use of insider information and (or) market manipulation of legal entities specified in pp. 1, 3 - 8, 11 and 12 of Article 4 of Federal Law No. 224-FZ dated June 27, 2010 "On counteraction to unauthorized use of insider information and to market manipulation, and on Amendment of Individual Acts of Law of the Russian Federation";

2.1.4. Regulation of Bank of Russia No. 5129 dated-U "On the procedure for the transfer by legal entities referred to in pp. 1, 3 - 7, 11 and 12 of Article 4 of Federal Law dated July 27

¹ When using this document, it is practical to check the validity of reference standards in the territory of the state using the applicable standard (and classifier) index as of January 1 of the current year and respective reference indices published during the current year. If the referenced standard has been modified (superseded), the superseding/modified standard will be applied when using the present document. If the referenced standard has been cancelled and not replaced, then the regulation referring thereto will be used to the extent not considering that reference.

No. 224-FZ dated 2010 Federal Law No. 224-FZ "On counteraction to unauthorized use of insider information and to market manipulation, and on Amendment of Individual Acts of Law of the Russian Federation, to the trade organizer, through which operations with financial instruments, foreign currency and (or) goods are carried out, a list of insiders upon its request;

2.1.5. EU Regulation No. 596/2014 dated April 16, 2014 on market abuse;

2.1.6. Guidelines on development and approval of the procedure of access to insider information and related confidentiality rules approved by the Bank of Russia No. 23-MP dated 14.09.2018;

2.1.7. Order of Federal Agency of Records No. 236 dated 20.12.2019 "On Approval of the List of standard management archival documents generated by activities of state bodies, local governments and organizations, including the period of their safekeeping".

3. TERMS AND DEFINITIONS

3.1. This Regulation uses the following additional terms and definitions **see Appendix A)** as per the [Common corporate glossary of NLMK Group "Terms and Definitions"](#), "Services\Common services\Regulatory documents" section of the corporate Intranet page.

Company; confidentiality of information; local regulation; applicable law; functional area.

3.2. Also, this Regulation uses the following additional terms and definitions (see **Appendix A**): **access to information; information protection; insider information; persons exercising managerial functions in the Company; provision of information; dissemination of information; regulatory risk in the area of counteraction to unauthorized use of insider information and to market manipulation.**

4. ABBREVIATIONS

4.1. The following abbreviations are used in this Regulation:

4.1.1. **INN**: taxpayer identification number.

4.1.2. **CS**: Corporate secretary of the Company.

4.1.3. **LR**: local regulation.

4.1.4. **OIC**: officer in charge.

4.1.5. **OGRN**: main state registration number.

4.1.6. **List**: list of the Company's insiders.

4.1.7. **Notification**: notification on inclusion/removal from the list of company's insiders.

4.1.8. **FCA**: Financial Conduct Authority of Great Britain.

5. ROLES

5.1. See Table 1. for the list of roles with definitions used in this Regulation.

Table 1 – list of roles

Role	Definition
Insider	A person who has access to the Company's insider information on the grounds provided for by applicable law.
Corporate Secretary	<p>The person in charge of:</p> <ul style="list-style-type: none"> – maintaining the list of insiders and the list of persons exercising managerial functions in the Company and their related parties; – sending notifications to persons included on the insider list about their inclusion in and removal from the list in accordance with the procedure established by applicable law; – informing the persons included on the list of insiders about the requirements of applicable law; – transfer of the list of insiders to the trade organizer in charge of transactions with financial instruments (Moscow Exchange), the Bank of Russia and the Financial Conduct Authority (FCA) at their request in the manner prescribed by applicable law.
Officer in charge	Officer in charge reporting to the CEO (Chairman of the Management Board) whose responsibilities include internal control to prevent, detect and stop illegal use of insider information and (or) market manipulation in accordance with the requirements of the law and related regulations.
Internal Control	Risk Management and Internal Control Division performing internal control functions as described in the Company's Internal Control and Risk Management Policy.

6. PROCEDURE FOR ACCESS TO INSIDER INFORMATION

- 6.1. The information recognized as insider information in accordance with the requirements of the law and the Regulation on Insider Information of the Company [1] [1] is subject to a special access procedure to ensure its protection, security and prevent its possible illegal use and distribution.
- 6.2. Insider information may be accessed by persons included on the List (see Section 7).

- 6.3. Members of the Board of Company have unlimited access to Company's insider information. Other persons included on the List shall have access to insider information only for performance of their official duties or contractual obligations.
- 6.4. Persons not included on the List shall only have access to insider information after their inclusion on the List.
- 6.5. Granting access to insider information to persons specified in p. 4.2. of the Regulation on Insider Information of the Company [1], who are insiders and, in accordance with the law, are not included on the list of insiders, is permitted after the corporate secretary has sent them a notice of restrictions on the use of insider information and (or) market manipulation.

7. PROCEDURE FOR MAINTAINING THE LIST OF COMPANY INSIDERS

- 7.1. In order to keep track of persons designated by the Company as insiders, and to comply with the requirements of applicable law, the Company maintains the List on an regular basis.
- 7.2. The list includes persons specified in p. 4.2 of the Regulation on Insider Information of the Company [1], excluding persons who have the right to directly or indirectly (through persons under their control) manage at least 25 percent of the votes in the Company's supreme governing body.
- 7.3. In accordance with the company's asset management chart, heads of divisions and functional areas include persons who have access to insider information of the Company due to their employment and (or) civil-law contracts[2].
- 7.4. Persons specified in p. 7.3 shall provide the following information to the corporate secretary:
 - connection with persons having access to insider information and subject to inclusion in (exclusion from) the List, and on the need to make changes in the personal data of persons included on the List;
 - contact addresses of the above persons to send the insider questionnaire (**Appendices B and C**).
- 7.5. Head of Legal Support in agreement with the corporate secretary shall define the list of transactions where insider information can potentially be shared, and ensure introduction of local regulation stating the inclusion of provisions on non-disclosure of insider information and liability for non-compliance with the requirements of applicable law in respective contracts. Heads of functions shall ensure that draft contracts include provisions on non-disclosure of insider information and liability for non-compliance with the requirements of the applicable law.
- 7.6. Upon receipt of contracts with legal entities or individuals for approval, Head of Legal Support shall identify the contracts which may result in third parties' accessing the insider information, and report them to the corporate secretary and head of the function supervising the contract.
- 7.7. The head of the function supervising the contract shall analyze the potential behind third parties gaining access to the insider information as a result of the contract signature and, if such potential exists shall ensure that the relevant contract includes provisions on non-disclosure of insider information and liability for non-compliance with the requirements of applicable law and inform the corporate secretary of the following:

соответствующий договор условий о неразглашении инсайдерской информации и ответственности за несоблюдение требований применимого законодательства и сообщает КС:

- details of persons who receive access to the insider information, the date of receipt and the period of access;
- addresses of persons with access to the insider information to send the insider questionnaire (**Appendices B and C**).

7.8. Head of HR shall provide to the corporate secretary the information on the intended conclusion of an employment/civil law contract with the persons specified in p. 7.3, and their e-mail addresses for sending the insider questionnaire.

7.9. The corporate secretary shall ensure that the persons specified in pp. 7.3, 7.4, and 7.5 of this Regulation have been informed in writing of the requirements of applicable law, the responsibility for illegal use of insider information, and that they will be included on the List, and send them the insider questionnaire to obtain the information needed for inclusion on the List.

7.10. The corporate secretary shall keep the List, and the list of persons exercising managerial functions in the Company, as well as their related parties. These lists shall be drawn in the e-format in the Russian and English languages and uploaded to the Company's corporate information system and printed in hard copy, if necessary. The Lists shall be updated monthly, and in case of any changes.

7.11. To ensure smooth operation of the information system, and following the instructions of the corporate secretary, Head of Digital Transformation and Information Technology shall adapt the system to meet legal requirements.

7.12. Legal entities with access to insider information shall keep their own Lists.

7.13. The procedure for keeping the List, the list of information on insiders to be included in the List shall be determined in accordance with the applicable legislation and requirements established by the rules of the stock exchanges where the Company's securities are traded.

7.14. The List shall contain the following information:

- The date of the List compilation/amendment:
- For legal entities: full name of the company, INN, OGRN (or other identification number for foreign legal entities), legal address, mailing address, date of inclusion (exclusion) on (from) the List, number of clause in Article 4 of the Federal Law No. 224-FZ (2.1.1) which is the basis for the entity inclusion/exclusion;
- For individuals: full name, date and place of birth, passport information, registered address, position, last name at birth (if different from current name), corporate and personal phone numbers, name of the Company, position, date of inclusion on (exclusion from) the List, number of clause in Article 4 of the Federal Law No. 224-FZ (2.1.1) which is the basis for the entity individual's inclusion/exclusion.

7.15. The corporate secretary shall keep the lists:

- in the e-document format signed with a qualified electronic signature;
- duly certified paper document.

7.16. The Company shall submit the lists to the trade organizers conducting transactions of the Company's securities, to the Bank of Russia and the FCA (or other regulator of the relevant state) upon their written request in the manner and within the time frame established by their regulatory acts (2.1.4).

8. PROCEDURE FOR NOTIFYING PERSONS ON INCLUSION/REMOVAL FROM THE LIST OF INSIDERS

8.1. Within 7 business days from inclusion or exclusion from the List the corporate secretary shall inform the persons of the fact (see Appendices E through G).

8.2. The corporate secretary shall send Notifications in one of the following ways:

- on paper by hand delivery against signature or by registered mail with return receipt or by courier [3];
- in the e-document format by sending the notification of inclusion on the List to the e-mail address specified in the insider questionnaire.

8.3. The CS shall keep track of all sent Notifications in accordance with this Regulation.

9. RULES FOR KEEPING INSIDER INFORMATION CONFIDENTIAL

9.1. The Company shall provide the necessary conditions for persons having access to insider information to keep the information confidential.

9.2. To protect confidentiality of insider information, the Company takes the following measures:

9.2.1. Measures to restrict unauthorized persons' access to the Company's premises:

- Ensuring access control and internal security procedures in the Company [4];
- Equipping the rooms accommodating the workplaces of persons with access to insider information with security alarms;
- Separating workplaces of persons having access to insider information to rule out the possibility of unauthorized receipt of insider information;
- Segregating workplaces by functional areas;

9.2.2. Measures to protect workplaces and document safekeeping locations:

- Keeping documents safe by storing them in safe boxes or locked cabinets and desk drawers;
- Restricting the use of free e-mail services for sending and forwarding documents containing insider information of the Company;
- Preventing unauthorized persons from seeing the insider information on paper/computer screens;
- Locking workstations when employees leave the workplace;

- Generating passwords for employee accounts based on recommendations to ensure password strength, as per the Regulation on ensuring security of personal data [5];

9.2.3. Measures to ensure protection of insider information transmitted electronically:

- Using cryptographic means of information protection;
- Placing computer screens and other devices for displaying information so as to prevent unauthorized viewing of insider information;
- Restricting the use of personal communication devices, and computers;
- Use of credentials when printing documents or working with similar devices by employees having access to insider information;

9.2.4. Organizational measures:

- Providing insider information only to persons included on the List;
- Signing of the insider information confidentiality agreement by persons having access to insider information (**Appendix I**);
- Communicating the requirements of this Regulation, the list of the Company's insider information and liability for the illegal use of insider information to persons having access to insider information;
- Supplementing the Notice of inclusion on the List with the requirements of applicable law, including the consequences of illegal use of insider information;
- Conducting negotiations in separate rooms to prevent unlawful sharing of information about the instance and subject of negotiations, if there is a risk of misuse of insider information;

9.2.5. Control over disclosure or provision of information:

- insider information transmitted electronically to e-mail addresses shall contain a signature stating confidentiality of the information;
- When transmitting documents containing insider information to e-mail addresses, send the files in a password-protected archive. Share the password to the recipient in a way different from e-mail (e.g., by a phone text message, by Lync, or Skype);
- When sharing paper documents containing insider information, enclose the documents in a non-transparent paper envelope labeled "Confidential".

9.3. Responsibilities of persons having access to insider information:

- Comply with legal requirements related to counteraction to unauthorized use of insider information and to market manipulation;
- Comply with the requirements of Company's internal documents regulating the procedure of access to insider information and the rules for protecting its confidentiality;

- Do not provide or disclose insider Information to any third Party, either an individual or a legal entity (including, but not limited to, in the form of a advice or any other form), regardless of whether this person is an affiliate or not;
- Do not use or reproduce insider information, as well as not to refer to it for any purposes not related to exercising of employment rights and performing of employment obligations in the Company;
- not to disclose insider Information without the Company's written consent or until the Company itself officially discloses/publishes such insider information;
- Ensure safekeeping of insider information eliminating any possibility of its loss or any unauthorized access to it by any person;
- Immediately notify the Company about all known cases of losing documents or any other information media containing insider information, and any other events which may result in disclosure of insider information;
- In case of receiving a justified request for provision of the Company's insider information from any government agency or any other state authority, local authority, within the competence and authority vested in these bodies by the effective legislation, as well as any other request for provision of insider information, immediately report the instance to the Company and attach the copy of such a request;
- Provide, upon the Company's request, the information on transactions with securities in the manner and within the time frame stipulated by law and the Company's internal documents;
- Return upon the Company's request or, if it is not possible, destroy all insider information received from the Company or for the Company, or a part thereof in any form, within three days from the moment of receiving such a request, and do not keep any copies of such information or data about this information, or any extracts from it in any form, and do not use or reproduce such information in full or in part for any purposes whatsoever;
- Upon termination of employment with the Company, hand over to the Company all documents and other information media containing insider information made available;
- Do not use insider information (directly or indirectly) for any purposes not immediately related to exercising employment rights and obligations in the Company, or for obtaining any commercial or other benefits over the Company, and do not use insider information in any other way to the detriment of the Company;
- Comply with other obligations provided by the law, regulations of the Bank of Russia and Company's internal documents regulating the procedure of access to insider information and the rules for protecting its confidentiality.

10. INTERNAL CONTROL

- 10.1. To counteract illegal use of insider information and market manipulation, Company effect internal control to prevent, detect and stop illegal use of insider information and (or) market manipulation in accordance with the requirements of the law and related regulations.
- 10.2. Internal control to prevent, detect and stop illegal use of insider information and (or) market manipulation in accordance with the requirements of the law and related regulation is an integral part of the Company's internal control and risk management system.
- 10.3. The main objectives of internal control are:
 - Ensuring compliance with the Russian legislation, constituent and corporate documents;
 - Preventing illegal unlawful use of insider information and (or) market manipulation.
- 10.4. Methods of internal control are based on the identification, analysis, assessment, monitoring of the risk of occurrence (losses) and (or) other adverse consequences as a result of non-compliance with the requirements of the legislation on counteracting illegal use of insider information and market manipulation, related regulations and internal documents, as well as the result of measures by the Bank of Russia (regulatory risk).
- 10.5. The internal control function in the Company is performed by the Officer in charge who reports and is accountable to the CEO (Chairman of the Management Board).
- 10.6. The Company effects continuous internal control. When the Officer in charge is temporarily absent, the CEO (Chairman of the Management Board) shall appoint an acting Officer in charge.
- 10.7. By the decision of the CEO (Chairman of the Management Board), Head of Internal Control of the Company may be appointed the Officer in charge..
- 10.8. In order to avoid conflict of interest in performance of their functions, the Officer in charge shall comply with the Company's approved requirements to prevention of conflict of interest.
- 10.9. The Officer in charge is guided by the principles of independence, objectivity, impartiality, and professional attitude.
- 10.10. The functions of the Officer in charge include:
 - identification, analysis, assessment and monitoring of regulatory risk, including development of measures to prevention, manage and avoid the consequences of the regulatory risk occurrence, and follow-up on such measures;
 - Keep tracking of events related to the regulatory risk. To monitor the regulatory risk, the Officer in charge keeps a log of regulatory risk events to record regulatory risk events and to follow up on implementation of measures aimed at preventing and avoiding the effects of the regulatory risk occurrences;;

- Follow-up on informing the Bank of Russia about probable and (or) occurred regulatory risk events recognized as significant by the Company, provided that the Company has decided to inform the Bank of Russia about significant regulatory risk events;
- Participation in handling grievances (including complaints), requests and applications related to counteracting illegal use of insider information and market manipulation. The Company has implemented the system for receiving and processing reports on events (facts, actions, intentions) that have led or may lead to a violation of legal requirements applicable to the Company and the rules it has adopted, including those related to counteracting illegal use of information (hereinafter, the Compliance Hotline). Any person who becomes aware of such violations may contact the Compliance Hotline using communication channels listed at the Company's website in the Compliance section;
- Making and submitting to the CEO (Chairman of the Management Board) reports on potential and (or) occurred regulatory risk events and reports on the activities of the Officer in charge. On an annual basis, the Officer in charge he submits to the CEO (Chairman of the Management Board) reports on potential and (or) occurred regulatory risk events and the activities of the Officer in charge.
- Drafting and submitting to the CEO (Chairman of the Management Board) proposals aimed at improving measures related to counteracting illegal use of insider information and market manipulation. The Officer in charge annually submits to the CEO (Chairman of the Management Board) proposals aimed at improving measures comply with requirements related to counteracting illegal use of insider information and market manipulation.
- Follow-up on the Company's documents compliance with the requirements on counteracting illegal use of insider information and market manipulation and consistency of between the Company's documents. Follow-up on the Company's documents compliance with the requirements on counteracting illegal use of insider information and market manipulation and consistency of between the Company's documents is based on monitoring of the legislation on counteracting illegal use of insider information.
- Participation in review of this Regulation to ensure its compliance with the requirements of the Russian Legislation related to counteracting illegal use of insider information and market manipulation, and Regulations of the Bank of Russia. The Officer in charge shall annually review this Regulation for compliance with the applicable law. If the requirements of applicable law or the Company internal documents change, this Regulation is subject to revision: the Officer in charge jointly with the corporate secretary develop the new version of the Regulation.
- Control on communicating requirements on counteracting illegal use of insider information and market manipulation, and Company's internal documents to persons holding positions with governing bodies, and to Company's employees;
- Follow-up on making own list of insider information. These actions are followed-up on a regular basis by analyzing the compliance of the approved list of insider information with the requirements of applicable law and internal documents of the Company, existing deadlines for amending the list, and by checking the disclosure of the said list on the Company's official Internet site;

сроков внесения изменений в перечень, а также проверкой факта раскрытия указанного перечня на официальном сайте Общества в информационно-телекоммуникационной сети «Интернет»;

- Follow-up on procedure for accessing the insider information;
- Follow-up on procedure and timeframes for accessing disclosing the Company's insider information;
- Follow-up on compliance with the terms and condition of transactions with financial instruments by persons specified in p. 5.3 of the Regulation on insider information [1];
- Control over implementation of measures specified in p. 4 of the Regulation on insider information [1]; control over the such measures is based on analyzing their compliance with Federal Law No. 224-FZ (2.1.1) and the regulations related thereto.

10.11. To perform internal control, the Company provides the Officer in charge with the resources (material, technical, human resources) necessary to achieve the objectives, and access to the information necessary to perform their functions.

10.12. To perform their functions, the Officer in charge may:

- Request documents and information, including explanations, from members of the management bodies, business units and employees of the Company necessary for due fulfilment of their functions;
- Informing the CEO (Chairman of the Management Board) on the results of the activities of the Officer in charge;
- Send to the Bank of Russia the information on potential and (or) occurred regulatory risk events related to counteracting illegal use of insider information and market manipulation.

10.13. The Officer in charge shall:

- Develop recommendations on counteracting illegal use of insider information and market manipulation to achieve the objectives set forth herein;
- Inform the CEO (Chairman of the Management Board) on all instances preventing the Officer in charge from performing their functions;
- Ensure confidentiality of documents and information obtained in the performance of their functions, except for cases established by the Russian legislation.

10.14. The Company communicates requirements on counteracting illegal use of insider information and market manipulation, and Company's internal documents to persons holding positions with governing bodies, and to Company's employees by means of publishing the above documents and requirements on its Internet site; Persons having access to insider information and notified of this fact shall read the documents on counteracting illegal use of insider information and market manipulation published on the Company's Internet site;

10.15. Persons holding positions with governing bodies, and Company's employees having access to insider information shall annually evaluate their activities for compliance with the requirements on counteracting illegal use of insider information and market manipulation, and internal documents by reading the List of the Company's insider information and this Regulation published on the Company's Internet site.

предмет соответствия требованиям в области противодействия неправомерному использованию инсайдерской информации и (или) манипулированию рынком и внутренним документам путем ознакомления с Перечнем инсайдерской информации Общества и настоящим Положением, размещенными на официальном сайте Общества.

11. REQUIREMENTS TO DOCUMENTS AND RECORDS FILING

11.1. Corporate Governance shall ensure centralized safekeeping of documents executed and received as part of compliance with the requirements of this Regulations in the timeframe set by the order of the Federal Agency of Records (2.1.7).

12. LIABILITY

12.1. Any person who has illegally used the insider information may be subject to disciplinary, administrative, criminal or civil liability in accordance with applicable law and the terms of contracts entered into with the Company.

12.2. Other persons who are not insiders, but who have gained access to the Company's insider information and shared insider information or performed transactions with the Company's securities using insider information may also be held liable, except in cases provided for by applicable law.

12.3. The Company may demand that persons who have illegally used the insider information, to repay the damages incurred to the Company by such unauthorized actions.

12.4. The corporate secretary shall be responsible for follow-up on compliance with the requirements of this Regulation.

DEVELOPED BY

Head of Corporate Activities and Listing Support -

signature

A. Osipov

**Approval sheet to P CG-307-0040-2021 "Regulation on access to insider information,
related confidentiality rules and internal control over compliance"**

APPROVED BY

No.	Position	Approval (yes/no)	Initials, last name
1	Chief Legal Officer	Yes 08.10.2021,	D. Donovan
2	Vice President HR & Management System	Yes 04.10.2021,	M. Arkhipov
3	Vice President Digital Transformation and IT	Yes 13.10.2021,	D. Kholkin
4	Head of Risk Management and Internal Control Division	Yes 05.10.2021,	O. Kotina

I hereby confirm that the data contained in this document is true:

Head of Corporate Activities and Listing Support

-

signature

A. Osipov

Compliance verified:

Business line manager, Organizational Development Division _

signature

S. Andreyev

14.10.2021,11:26

Comments:

APPENDIX A
(reference) TERMS AND
DEFINITIONS

- A.1. This Regulation uses terms and definitions as per the **Common corporate glossary of NLMK Group "Terms and definitions"** available in the "Services\Common services\Regulatory documents" section of the corporate Intranet page:
- A.1.1. **The Company:** a business entity which is a resident of the Russian Federation.
 - A.1.2. **Information confidentiality:** obligatory requirement to the person who received access to certain information not to share such information to the third parties without the consent of the owner of such information.
 - A.1.3. **Local regulation:** internal document of the plant designed for repeated use and establishing the rules of conduct in the part not regulated by the Russia legislation.
 - A.1.4. **Applicable law:** Constitution of the Russian Federation, international treaties entered into by the Russian Federation, legislation of the Russian Federation, as well as laws and regulations of foreign states that apply to the Company and/or its employees due to relevant circumstances (e.g. conducting business in the territory of a particular state, conditions of a contract with a foreign business partner, etc.).
 - A.1.5. **Functional area:** a function managed at the Corporate level with direct reporting line to the CEO (Chairman of the Management Board).
- A.2. Also, this Regulation uses the following additional terms and definitions:
- A.2.1. **Access to information:** ability to obtain and use information.
 - A.2.2. **Protection of information:** activities to prevent leakage of protected information, unauthorized and unintended effect on protected information.
 - A.2.3. **Insider information:** Accurate and specific information which was not disclosed or provided (including information constituting a commercial, professional banking, communications secret (in the part related to money transfer) and other secrets protected by the law), disclosure or provision of which may have a significant influence on the Company's financial instruments, foreign currency and (or) goods. The Company's insider information includes information listed by the regulation of the Bank of Russia, and other information recognized as such taking into account the nature of the Company's activities. The Company discloses the list of the Company's insider information through the Company's website.
 - A.2.4. **Persons exercising managerial functions in the Company:** The CEO (Chairman of the Management Board), members of the Board of Directors and the Management Board, heads of Divisions and functions as per the Company's asset management chart.

A.2.6. **Provision of information:** actions aimed to obtain information by certain persons in accordance with the Russian legislation on securities.

A.2.7. **Sharing of information:** Actions:

- aimed to obtain information by general public or provide share information with general public, including by its disclosure in accordance with the Russian legislation on securities;
- related to information publishing in mass media, including in electronic, information and telecom networks accessible by general public (including the Internet);
- related to information sharing via electronic, information and telecom networks accessible by general public (including the Internet).

A.2.8. **Regulatory risk related to counteraction to unauthorized use of insider information and to market manipulation:** Risk that the Company will incur expenses (losses) and (or) suffer other adverse consequences as a result of its non-compliance or non-compliance of its activities with the requirements related to counteraction to unauthorized use of insider information and to market manipulation:, regulations of the Bank of Russia, other internal documents of the Company, and (or) as a result of measures of the Bank of Russia against the Company.

APPENDIX B
(reference)

Questionnaire for insider – individual

Questionnaire for insider	
in Russian	in English
last name (including previous last name)	
First name	
Middle name	
Date Of Birth	
Place of birth	
Passport details	
National identification number (if applicable)	
Residence (registered) address - country, region, postal code, city, street, building, apartment	
Contact address	
Personal phone number (including mobile)	
Corporate phone number (including mobile)	
Position with the Company	
E-mail	

I acknowledge the consent to the cross-border transfer of my personal data and my understanding of my responsibilities as an insider, and the responsibility for making transactions using insider information and illegal disclosure of insider information envisaged by applicable Russian legislation and the EU Market Abuse Regulation.

Should there be any changes in the above data, I hereby undertake to promptly notify NLMK.

_____ Name
(signature)

date

APPENDIX C
(reference)

Questionnaire for persons exercising managerial functions in the Company

Questionnaire for persons exercising managerial functions	
in Russian	in English
Last name (including previous last name)	
First name	
Middle name	
Date of birth	
Place of birth	
Passport details	
National identification number (if applicable)	
Residence (registered) address - country, region, postal code, city, street, building, apartment	
Contact address	
Personal phone number (including mobile)	
Corporate phone number (including mobile)	
Position with the Company	
E-mail	

I acknowledge my understanding of my responsibilities as a Company's insider, and the responsibility for making transactions using insider information and illegal disclosure of insider information envisaged by applicable Russian legislation and the EU Market Abuse Regulation.

I acknowledge the consent to processing and cross-border transfer by NLMK (2, Metallurgov Sq., Lipetsk, Russia) of my personal data specified in this questionnaire and its attachments, for the purpose of complying with applicable requirements of the Russia legislation, including those related to information disclosure for the period necessary to comply with the specified requirements.

I acknowledge my consent to NLMK notifying the Financial Conduct Authority (UK) on the transactions with NLMK's Securities performed by me.

Should there be any changes in the above data, I hereby undertake to promptly notify NLMK.

(signature)

Name

date

Attachment to

the questionnaire for persons exercising managerial functions in the

List of persons closely associated to me*

No.	First name, last name /name in English	Information on consent to notify NLMK on transactions performed with NLMK securities to be sent to Financial Conduct Authority (UK) (select from the drop-down list)

* "Person closely associated with me" means:

- (a) Spouse or partner considered equivalent to a spouse under national law;
- (b) child as a dependent under national law;
- (c) A relative who has lived with him/her for at least one year as of the date of the transaction in question;
- (d) An organization with respect to which the person or person named in (a), (b), or (c):
 - Performs managerial functions;
 - Controls directly or indirectly;
 - Is the a beneficiary.

- I confirm the fact of the above mentioned directly associated with me persons' written notice on the obligations imposed on them by the Russian law and the EU Market Abuse Regulation (a copy of the above notice is preserved by me) and the fact of my getting of the above mentioned persons' consent to the cross-border transfer of their personal data.

Should there be any changes in the above data, I hereby undertake to promptly notify NLMK.

APPENDIX D
(reference)

Questionnaire for insider – legal entity

Questionnaire for insider		
	in Russian	in English
Full name		
Abbreviated name:		
INN		
OGRN		
Identification number (if applicable)		
Domicile		
Mailing address		
Phone number		
E-mail		

**APPENDIX E
(reference)**

**NOTIFICATION
of inclusion/removal from NLMK's insider list**

No.	1 Information on the notifying party
1.1	Full company name
1.2	INN
1.3	OGRN
1.4	Domicile
1.5.	Mailing address
1.6	Website
1.7	First name, last name of the contact person in charge of keeping the list of insiders
1.8	Contact person's phone number
1.9	Contact person's e-mail
1.10	Organization's category of insiders as per Article 4 of the Federal Law No. 224-FZ dated 27.07.2010

No.	II. Data on the individual included (excluded from) on the list of insiders
2.1	Full name
2.2	Date of birth
2.3	Place of birth
2.4	Position held by the person on the list (person removed from the list) in the notifying entity (if any)
2.5	Financial instrument, foreign currency and/or goods
2.6	Number of clause in Article 4 of Federal Law No. 224-FZ dated 27.07.2010 used as a basis for the individual's inclusion (exclusion from) on the list of insiders
2.7	Basis for inclusion (exclusion from) on the list of insiders
2.8	Type of occurrence of the event of which the individual is notified
2.9	Date of occurrence of the event of which the individual is notified

Corporate Secretary

(signature)
Stamp

- Full name

For reference:

Insider information is accurate and specific information which was not disclosed or provided (including information constituting a commercial, professional banking, communications secret (in the part related to money transfer) and other secrets protected by the law), disclosure or provision of which may have a significant influence on the Company's financial instruments, foreign currency and (or) goods.

Please note that from the individual's inclusion on the list of insiders of the Company:

- The individual becomes subject to the limitations provided for by Article 6 of Federal Law No. 224-FZ dated 27.07.2010 "On counteracting illegal use of insider information and market manipulation";
- The individual becomes liable under Article 7 of Federal Law No. 224-FZ dated 27.07.2010 "On counteracting illegal use of insider information and market manipulation";
- The individual takes on obligations under Article 10 of Federal Law No. 224-FZ dated 27.07.2010 "On counteracting illegal use of insider information and market manipulation", and Chapter 5 of the Regulation on insider information of the Company.

For more details on NLMK's insider information and the list of information considered as NLMK's insider information, go to: [.http://www.nlmk.com](http://www.nlmk.com)

NLMK contact details: Phone No: +7

(4742) 44-49-89;

Fax: +7 (4742) 44-22-55;

E-mail: .

**APPENDIX F
(reference)**

NOTIFICATION

of inclusion/removal from the list of persons exercising managerial functions.

No.	1 Information on the notifying party
1.1	Full company name
1.2	INN
1.3	OGRN
1.4	Domicile
1.5.	Website
1.6	Mailing address
1.7	First name, last name of the contact person in charge of keeping the list of insiders
1.8	Contact person's phone number
1.9	Contact person's e-mail
1.10	Organization's category of insiders as per Article 4 of the Federal Law No. 224-FZ dated 27.07.2010

No.	II. Information about the individual included (excluded from) on the list of persons exercising managerial functions
2.1	Full name
2.2	Date of birth
2.3	Place of birth
2.4	Position held by the person on the list (person removed from the list) in the notifying entity (if any)
2.5	Financial instrument, foreign currency and/or goods
2.6	Number of clause in Article 4 of Federal Law No. 224-FZ dated 27.07.2010 used as a basis for the individual's inclusion (exclusion from) on the list of insiders
2.7	Basis for inclusion (exclusion from) on the list of insiders
2.8	Type of occurrence of the event of which the individual is notified
2.9	Date of occurrence of the event of which the individual is notified

Corporate Secretary

(signature
)

Stamp

Full name

For reference:

Please note that from the individual's inclusion on the list of persons exercising managerial functions:

- The individual becomes subject to the limitations provided for by Article 6 of Federal Law No. 224-FZ dated 27.07.2010 "On counteracting illegal use of insider information and market manipulation", and additional limitations set forth in Article 19 of EU Regulation No. 596/2014 market abuse (MAR)
- The individual becomes liable under Article 7 of Federal Law No. 224-FZ dated 27.07.2010 "On counteracting illegal use of insider information and market manipulation";
- The individual takes on obligations under Article 10 of Federal Law No. 224-FZ dated 27.07.2010 "On counteracting illegal use of insider information and market manipulation", and Chapter 5 of the Regulation on insider information of the Company.

The EU Market Abuse Regulation defines insider information as information of a precise nature, which has not been made public, relating, directly or indirectly, to NLMK or its Securities, and which, if it were made public, would be likely to have a significant effect on the prices of those Securities.

The Russian Law defines insider information as accurate and specific information that has not been made public, that could materially affect the price of the Securities, and that is included into NLMK's insider information list (see the official NLMK site).

Selective disclosure of insider information is unlawful. Insider information must be held in confidence and not disclosed to any other person, except in the normal course of the Manager's duties and only with the prior approval of NLMK Corporate Secretary.

If there is a reason to believe a breach of confidence has or likely to occur and any price sensitive/inside information has leaked to the market, the corporate secretary must be notified immediately.

Those included on the list of persons exercising managerial functions in the Company are prohibited from dealing in the Securities on the basis of inside information (i.e. using insider information in its possession by acquiring or disposing of, for its own account or the account of a third party, directly or indirectly, Securities and other financial instruments to which that information relates), or from recommending or inducing another person to engage in insider dealing, or from disclosing the inside information to any third person.

Those included on the list of persons exercising managerial functions in the Company also shall not deal in the Securities during the blackout period, subject to very limited exceptions. The blackout period means 30 calendar days before announcement of an interim financial report or a year-end report which the Company is obliged to make public under the rules of the trading venue where the Company's shares are admitted to trading, or under national law.

In accordance with this requirement, those included on the list of persons exercising managerial functions in the Company may not conduct any transactions for their own account or for the account of a third party, directly or indirectly, relating to the Securities or to derivatives or other financial instruments linked to them, during:

- the period of 30 days immediately preceding the preliminary announcement of NLMK's annual results; or
- the period of 30 days immediately preceding the publication of NLMK's annual financial report; and
- the period of 30 days immediately preceding the announcement of NLMK's relevant interim period results.

For the avoidance of doubt, the restrictions specified apply to reports issued under Russian law or the listing rules of the Moscow Exchange or the London Stock Exchange applicable to NLMK. The information concerning the dates of NLMK's reporting announcements is published on "Financial Calendar" page of the official NLMK site.

In accordance with the Market Abuse Regulation, exceptions to these insider dealing restrictions are permitted only in very limited exceptions and only upon permission in advance of the dealing. If you have any questions about this insider dealing policy, or wish to discuss possible exceptions to these restrictions, please contact NLMK Corporate secretary.

«НЛМК».

For more details on NLMK's insider information and the list of information considered as NLMK's insider information, go to: [.http://www.nlmk.com](http://www.nlmk.com)

NLMK contact details: Phone No: +7

(4742) 44-49-89;

Fax: +7 (4742) 44-22-55;

E-mail: .

**APPENDIX G
(reference)**

**NOTIFICATION
of inclusion/removal from NLMK's insider list**

No.	I. Information on the notifying party
1.1	Full company name
1.2	INN
1.3	OGRN
1.4	Domicile
1.5.	Website
1.6	Mailing address
1.7	First name, last name of the contact person in charge of keeping the list of insiders
1.8	Contact person's phone number
1.9	Contact person's e-mail
1.10	Organization's category of insiders as per Article 4 of the Federal Law No. 224-FZ dated 27.07.2010

No.	II. Data on the legal entity included (excluded from) on the list of insiders
2.1	Full company name
2.2	INN
2.3	OGRN
2.4	Domicile
2.5	Mailing address
2.6	Financial instrument, foreign currency and/or goods
2.7	Number of clause in Article 4 of the Federal Law No. 224-FZ dated 27.07.2010 used as a basis for the entity inclusion (exclusion from) on the list of insiders
2.8	Basis for inclusion (exclusion from) on the list of insiders
2.9	Type of occurrence of the event of which the entity is notified
2.10.	Date of occurrence of the event of which the individual is notified

Corporate Secretary

(signature)
Stamp

— Full name

For reference:

Insider information is accurate and specific information which was not disclosed or provided (including information constituting a commercial, professional banking, communications secret (in the part related to money transfer) and other secrets protected by the law), disclosure or provision of which may have a significant influence on the Company's financial instruments, foreign currency and (or) goods.

Please note that from the entity's inclusion on the list of insiders of the Company:

- The individual becomes subject to the limitations provided for by Article 6 of Federal Law No. 224-FZ dated 27.07.2010 "On counteracting illegal use of insider information and market manipulation";
- The individual becomes liable under Article 7 of Federal Law No. 224-FZ dated 27.07.2010 "On counteracting illegal use of insider information and market manipulation";
- The individual takes on obligations under Article 10 of Federal Law No. 224-FZ dated 27.07.2010 "On counteracting illegal use of insider information and market manipulation", and Chapter 5 of the Regulation on insider information of the Company.

For more details on NLMK's insider information and the list of information considered as NLMK's insider information, go to: [.http://www.nlmk.com](http://www.nlmk.com)

NLMK contact details: Phone No: +7

(4742) 44-49-89;

Fax: +7 (4742) 44-22-55;

E-mail: .

**APPENDIX I
(reference)**

Insider information confidentiality agreement

**Insider information confidentiality
agreement**

dated __, 20

Public Joint-Stock Company "Novolipetsk Steel", registered under the laws of the Russian Federation (OGRN 1024800823123) at: 2 Metallurgov Sq. (hereinafter, the Company) in the person of the Corporate Secretary

- acting under Power of Attorney No. _ dated __, , and

- (hereinafter, -

Insider ¹), jointly referred to as the "Parties" and severally a "Party") have entered into this Agreement on the following:

1. Subject matter of the Agreement

- 1.1. This Agreement establishes the procedure and conditions for providing the Insider with Insider information (as defined in p. 1.2 hereof) and the obligations of the Insider on non-disclosure of Insider information.
- 1.2. The Parties have agreed that the term "Insider Information" for the purposes of this Agreement shall be defined similarly to its definition in the Russian legislation, as per the Federal Law No. 224-FZ "On counteraction to unauthorized use of insider information and to market manipulation, and on Amendment of Individual Acts of Law of the Russian Federation" dated 27.07.2010 (hereinafter, FZ-224), and the regulations of the European Union, UK legislation, and other applicable legislation (hereinafter, "applicable foreign legislation").

The Company discloses the exhaustive list of the Company's insider information through the Company's website (<http://www.nlmk.com>).

- 1.3. This Agreement is entered into in connection with the inclusion of the Insider on the list of the Company's insiders.

2. Obligations of the Insider

2.1. The Insider shall:

- 2.1.1. Comply with the requirements of 224-FZ and requirements of the Company's internal documents regulating confidentiality of insider information (Appendix 1 and Appendix 2 hereto).
- 2.1.2. Handle insider information in strict compliance with the requirements of the Company's internal documents regulating confidentiality of insider information (Appendix 1 and Appendix 2 hereto).

¹ Insiders are the persons specified in Clause 4.2 of the Regulation on insider information of NLMK [1].

2.1.3. At the request of the Company, the Insider shall provide evidence of compliance with the requirements specified herein.

3. Period for the Insider to keep insider information confidential

- 3.1. The Insider's obligations to keep insider information confidential set forth for in this Agreement arise from the moment of the Insider's inclusion on the list of insiders (receipt by the Insider of the Company's notification of inclusion on the list of insiders) and cease from the moment the Company discloses and (or) provides the insider information as required by law.
- 3.2. Disclosure and (or) provision by the Company of a particular type of insider information does not terminate the Insider's obligations hereunder with regard to other types of insider information, which has not been provided or disclosed by the Company.

4. Contact person

- 4.1. The Insider shall address all requests for information, or any other issues regarding Insider information only to the corporate secretary of the Company
- full name (e-mail address), phone _ another person only appointed by the _____) or Company.

5. Liability

- 5.1. In the event of default hereunder, the Insider shall be liable in accordance with applicable law.
- 5.2. The Insider shall reimburse the Company in full for losses, including loss of profit.
- 5.3. Also, the Insider shall reimburse the Company for the amount of fines imposed on the Company by the authorized state body in connection with the Insider's violation of the obligations set forth herein.

6. Validity period

- 6.1. This Agreement shall come into force on the date of its signature and remain in effect until the full discharge of obligations by the Insider.
- 6.2. The terms and conditions hereof shall apply to the relations between the Parties from the moment of the Insider's inclusion on the list of insiders (receipt by the Insider of the Company's notification of inclusion on the list of insiders).
- 6.3. Expiry of the present Agreement shall not release the Insider from liability for violation hereof.

7. Other terms and conditions

- 7.1. Appendices to this Agreement constitute an integral part hereof.
- 7.2. This Agreement constitutes the final agreement between the Parties related to confidentiality of insider information, and supersedes all prior written or oral negotiations, discussions, agreements or arrangements between the Parties related to the subject matter hereof.

- 7.3. This Agreement will be governed by the laws of the Russian Federation.
- 7.4. Any disputes, disagreements and claims arising from the present Agreement and in relation to it, including the disputes related to its of signature, execution, breach, termination or invalidity will be considered in the Arbitration Court of the Lipetsk region.
- 7.5. Any amendments and addenda hereto shall contain a reference to this Agreement and shall be duly signed by each of the Parties.
- 7.6. This Agreement is made in the Russian language in 2 (two) counterparts of equal legal effect, one for each Party.

8. Details and signatures of the Parties

Public Joint-Stock Company

"Novolipetsk Steel"

Venue: 2, Metallurgov sq., Lipetsk

OGRN 1024800823123

Insider_

Passport_

Issued on ___ .

- Name of the Corporate Secretary -

Name of the Insider

Appendices:

1. Regulation on Insider Information of PJSC "Novolipetsk Steel";
2. P CG-307-0040-2021 Regulation on access to insider information, related confidentiality rules and internal control over compliance

APPENDIX J
(reference) List
of references

- [1] Regulation on Insider Information of PJSC
"Novolipetsk Steel" approved by the Board of Directors on 18.03.2020 (BoD MoM No. 270 dated 19.03.2020).
- [2] Order No. 977 dated 30.11.2018 "Approval of the asset management chart".
- [3] Regulation on access control and internal security procedures approved by the CEO (Chairman of the Management Board) on 27.02.2017.
- [4] P HR-386-0094-2021 Regulation on harmonization of OAD management processes.
- [5] P DIT-345-0095-2021 Regulation on ensuring security of personal data.

Document revision sheet

Form 0

Revision number	Revision date	List of revised items

**LIST OF REVISION
HISTORY**

Form 0

Rev. No.	Document name	Date of approval	Revision date	Details of administrative document
1	P CG-307-0040-2020 "Regulation on access to insider information, related confidentiality rules and internal control over compliance" (First edition)	23.03.2020	09.04.2020	Order of the CEO (Chairman of the Management Board) No. 232 dated 09.04.2020