

Approved
on December 15, 2017
by the Board of Directors
of Public Joint-Stock Company
“Cherkizovo Group”
(Minutes No.12/127d dated December 15, 2017)

**REGULATIONS
ON INFORMATION POLICY
IN DISCLOSURE
AND DELIVERY OF INFORMATION
of Public Joint-Stock Company
“Cherkizovo Group”
(version No. 1)**

Moscow,
2017

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ARTICLE 1. GENERAL PROVISIONS

- 1.1. The Regulations on the Information Policy in Disclosure and Delivery of Information of the Public Joint Stock Company “Cherkizovo Group” (hereinafter referred to as the Regulations) has been developed in accordance with the laws of the Russian Federation, the Corporate Governance Code approved by the Bank of Russia, the provisions of which are based on international practices in corporate governance area and corporate governance principles developed by the Organization for Economic Cooperation and Development (hereinafter - the Corporate Governance Code), as well as the rules and requirements of the Bank of Russia.
- 1.2. The Company may disclose and deliver information in accordance with foreign law, in the event that the Company has the duty to disclose or deliver information in accordance with foreign law.
- 1.3. These Regulations determine the principles, objectives and tasks of disclosure and delivery of information by the Company.
- 1.4. In the event of a conflict of the Regulations with the law, statutory provisions shall apply.

ARTICLE 2. TERMS AND ABBREVIATIONS

- 2.1. Abbreviations and definitions used in this Information Policy:

Information policy in disclosure and delivery of information is part of the Company's information policy based on a set of principles and procedures for disclosure and delivery of information about the Company to protect rights of stakeholders to the information necessary for making investment, management and other decisions, and also with the aim of creating a favorable image of the Company by increasing its information openness and transparency (hereinafter referred to as the "Information Policy").

A favorable image is a positive image of the Company's perception by stakeholders, based on the information received about the Company.

Information about the company is information, regardless of its form, directly or indirectly related to the Company.

Stakeholders are shareholders, investors (potential investors), analysts, employees, counterparties, media representatives, state bodies and other persons interested in obtaining information about the Company.

Confidential information is information with limited access in accordance with the laws of the Russian Federation and internal documents of the Company, including information constituting commercial secret, insider information and personal data.

Information security is a state of information security, which ensures its confidentiality, integrity, authenticity and creates conditions for the accessibility of information to authorized persons.

Official comments means the delivery and disclosure of information in the form of oral and written statements, explanations, interviews, appeals and other forms by authorized officials of the Company.

ARTICLE 3. GOALS AND OBJECTIVES

3.1. Information policy goals:

- to satisfy information needs of stakeholders in obtaining timely, complete and reliable information about the Company;
- to provide free and easy access to information about the Company;
- to ensure a reasonable balance between the interests of the Company and stakeholders when delivering information;
- to form long-term relations of trust between the Company and stakeholders.

3.2. Information policy goals:

- to ensure the rights of shareholders to receive reliable and complete information about the Company;
- to establish a unified approach of the Company to disclosure and delivery of information;
- to ensure transparency of the Company's activities for stakeholders;
- to increase the level of openness and trust in relations between the Company and stakeholders;
- to ensure effective interaction of the Company with stakeholders;
- to establish the principles of protecting information about the Company.

ARTICLE 4. PRINCIPLES

- 4.1. The Company follows the principles of disclosure and delivery of information by public joint stock companies recommended by the Corporate Governance Code, constantly improving the mechanisms for their implementation.
- 4.2. The main principles of the Information Policy are: regularity, consistency, efficiency, timeliness, accessibility, reliability, completeness, comparability, neutrality, fairness, ease of control, disclosure control, and confidentiality of information.
- 4.3. The principles of the Information Policy are fulfilled through the distribution of functional duties between structural divisions and officials of the Company, as well as the control bodies exercising control over the fulfillment of their functions.

ARTICLE 5. TYPES OF INFORMATION

- 5.1. In the Information Policy information about the Company is divided into the following types:

1. Mandatory disclosed information;
2. Voluntary disclosed information;
3. Information provided at the request of the Stakeholders;
4. Confidential Information

ARTICLE 6. INFORMATION DISCLOSURE

- 6.1. The Company discloses information in accordance with the laws of the Russian Federation, regulatory acts of the Bank of Russia, as well as the listing rules of the Moscow Stock Exchange.
- 6.2. Disclosure of information means ensuring its accessibility to all persons interested in it, regardless of the purpose of obtaining this information in accordance with the procedure guaranteeing its access to and receipt of the listing rules of the Moscow Stock Exchange, the Charter and internal documents of the Company provided for by the laws of the Russian Federation.
- 6.3. The Company may, on a voluntary basis, disclose additional information, including that recommended by the Corporate Governance Code. The list, form and scope of additional disclosures are determined by the decision of the Director General.
- 6.4. The Company has the right not to disclose voluntarily disclosed information if its disclosure can damage the interests of the Company, shareholders or other stakeholders.
- 6.5. The information disclosed by the Company shall not violate the rights and legitimate interests of the Company, stakeholders or other third parties.
- 6.6. The Company complies with the requirements for the disclosure of insider information in accordance with the laws of the Russian Federation.

ARTICLE 7. DELIVERY OF INFORMATION

- 7.1. The delivery of information refers to actions aimed at obtaining information from a certain range of persons or transmitting information to a specific circle of persons.
- 7.2. The delivery of information by the Company is carried out in accordance with the laws of the Russian Federation, the laws of a foreign state, in the event that the Company has the obligation to deliver information in accordance with foreign law, the charter and internal documents of the Company.
- 7.3. Access to confidential information can be provided if there is a right to receive confidential information and a person signs an agreement on non-disclosure of confidential information.
- 7.4. Shareholders, members of management bodies, control bodies and employees of the Company are obliged to notify (inform) the Company about events (facts) stipulated by law,

the Charter and internal documents of the Company. The notification (informing) procedure is provided for by the laws, the Charter and internal documents of the Company.

- 7.5. Except for the cases provided for by law, members of the Company's bodies, officials of the Company shall not be entitled to provide confidential information, as well as the information that is disclosed, until it is disclosed.

ARTICLE 8. WAYS AND MEANS

- 8.1. The Company discloses or delivers information in the following ways:
- publication through the [Interfax](#) news agency;
 - posting on the [website of the Company](#);
 - social networks posting;
 - print publications;
 - holding meetings with stakeholders;
 - delivery of Information to stock exchange;
 - granting to shareholders and other eligible persons access to information (documents);
 - by other ways provided by the laws, the Charter and internal documents of the Company, as well as in ways independently determined by the Company.
- 8.2. The Company has the right to use several ways to disclose or deliver the same information.
- 8.3. When disclosing and delivering information, the following means of communication are used:
- written documents or materials prepared for both internal and external purposes, including press releases, press statements, etc.;
 - oral reports, including interviews, press conferences, speeches at public events;
 - audiovisual media, including video, corporate video, speech or interview;
 - electronic materials, including, e-mail, the Internet.
- 8.4. The Company has the right to use any available means to disclose or deliver information, and also to use several means to disclose or deliver the same information.
- 8.5. Copies of documents and information can be submitted to stakeholders upon request.

ARTICLE 9. IMPLEMENTATION AND MONITORING

- 9.1. The Information Policy is implemented by the Director General. The General Director of the Company is responsible for the implementation of the Information Policy, including the completeness and reliability of the information disclosed and delivered.
- 9.2. Official comments to the stakeholders on the activities of the Company are authorized to be given only by the Chairman of the Board of Directors, the General Director or the Director for work with state structures and public organizations.

- 9.3. Control over the observance of the Information Policy is exercised by the Board of Directors. The Board of Directors may entrust the Audit Committee of the Board of Directors with the duty to monitor compliance with the Information Policy.

ARTICLE 10. PROTECTION

- 10.1. The Company seeks to ensure information security.
- 10.2. Measures to ensure the information security of the Company are determined by internal documents of the Company.
- 10.3. The Company takes the necessary measures to protect confidential information, including determining the lists of such information, the mode of working with such information, and also determining persons who monitor compliance with the established procedure for handling confidential information.
- 10.4. The Company strives to ensure a reasonable balance between the interests of stakeholders in disclosing and delivering them information and interests of the Company interested in maintaining confidentiality of important information that may have a significant impact on the Company's competitiveness.
- 10.5. Any person who has access to confidential information has no right to use the information received to the detriment of the interests of the Company, its shareholders, and also in order to obtain an unreasonable advantage over other persons.
- 10.6. Persons who illegally received confidential information are liable in accordance with the laws of the Russian Federation.
- 10.7. Persons who have access to confidential information are responsible for non-compliance with information confidentiality regimes.