

APPROVED

President of Closed Joint Stock Company

Saint-Petersburg International Mercantile Exchange

October 03, 2013 (Order No. 628)

(signed) **A.E. Rybnikov**

PROCEDURE
for Submission of Insider Lists to Closed Joint Stock Company Saint-Petersburg
International Mercantile Exchange

1. General Provisions.

1.1. This Procedure for Submission of Insider Lists to Closed Joint Stock Company Saint-Petersburg International Mercantile Exchange (hereinafter referred to as the Procedure) is developed in pursuance of the following statutory regulations:

- Federal Law No. 224-FZ “On Combating the Misuse of Insider Information and Market Manipulation and on Amendments to Certain Laws of the Russian Federation” dated July 27, 2010 (hereinafter referred to as the Law);
- Order No. 13-51/ПЗ-Н of the FFMS (Federal Financial Markets Service) of Russia dated June 18, 2013 “On Approving the Regulation on Notifying Persons of Their Inclusion in the List of Insiders and Exclusion from such List; the Regulation on Sending Lists of Insiders to Trade Organizers Through Which Operations with Financial Instruments, Foreign Currency and/or Goods are Performed; and the Regulation on the Procedure and Terms for Insiders to Send Notification on Their Operations” (hereinafter referred to as the Regulation).

1.2. This Procedure and all amendments and additions hereto are approved by the President of Closed Joint Stock Company Saint-Petersburg International Mercantile Exchange (hereinafter referred to as “CJSC SPIMEX”, the “Exchange”) and enter into force from the date of their approval, unless a different date is established by the decision of the President of the Exchange.

1.3. This Procedure and all amendments and additions hereto are disclosed on the website of CJSC SPIMEX (www.spimex.com).

1.4. All Appendices to this Procedure are its integral part.

2. Procedure for Submission of Insider Lists to CJSC SPIMEX.

2.1. To verify non-standard transactions (applications) for improper use of insider information and (or) market manipulation, CJSC SPIMEX is entitled to send a written request (letter of enquiry) to submit an insider list to the following organizations:

2.1.1. Business entities included in the register provided for in Article 23 of Federal Law No. 135-FZ “On Protection of Competition” dated July 26, 2006 and occupying a dominant position on the market of particular commodities within the geographical boundaries of the

Russian Federation if the relevant commodities and (or) financial instruments which prices depend on such commodities are admitted to organized trading of CJSC SPIMEX and (or) if an application is submitted in respect of such commodities and (or) financial instruments for their admission to trading at organized trading of CJSC SPIMEX;

2.1.2. Clearing organizations and lending institutions involved in settlements according to the results of transactions performed during organized trading;

2.1.3. Other trade organizers if financial instruments and (or) commodities are traded there which are admitted to organized trading by CJSC SPIMEX or in which respect an application is submitted for their admission to trading at organized trading of CJSC SPIMEX;

2.1.4. Professional securities market participants and other persons engaged on behalf of the customers through CJSC SPIMEX in transactions in financial instruments and (or) commodities;

2.1.5. Legal entities having access to insider information under contracts concluded with the persons specified in subparagraphs 2.1.1. - 2.1.4. and included in insider lists of the specified persons;

2.1.6. Legal entities which own at least 25 percent of votes in the supreme management body of persons specified in subparagraphs 2.1.1. - 2.1.4. and legal entities who by virtue of ownership of shares (interest) in the authorized capital of persons specified in subparagraphs 2.1.1. - 2.1.4. have access to insider information of such persons on the basis of federal laws or constituent documents;

2.1.7. News agencies performing disclosure or provision of information to persons specified in subparagraphs 2.1.1. - 2.1.4.;

2.1.8. Legal entities engaged in assigning ratings to persons specified in subparagraphs 2.1.1. - 2.1.4. or financial instruments admitted to organized trading of CJSC SPIMEX and (or) in relation to whose financial instruments an application is submitted for admission to trading at organized trading of CJSC SPIMEX.

2.1.9. Management companies performing functions of the sole executive bodies of the persons specified in subparagraphs 2.1.1. - 2.1.4.

2.2. Written request (enquiry) of CJSC SPIMEX to submit the organization's insider list must contain:

2.2.1. The name of the organization where a written request (enquiry) is sent to.

2.2.2. One or more grounds for sending a written request (enquiry) (one or more numbers of the relevant paragraphs of Article 4 of the Law are specified, according to which the organization is recognized as an insider).

2.2.3. Reference to the organization's obligation to transfer the insider list to CJSC SPIMEX.

2.2.4. Date (dates) by which the organization's insider list must be drawn up.

2.2.5. The timeframe for performance of the obligation to transfer the organization's insider list to CJSC SPIMEX.

2.3. Timeframes for performance of the obligation to transfer the organization's insider list to CJSC SPIMEX:

- Five business days from the date of receipt by the organization of a written request (enquiry) from CJSC SPIMEX to submit the insider list if CJSC SPIMEX requests insider lists for ten days or less;
- Twenty business days from the date of receipt by the organization of a written request (enquiry) from CJSC SPIMEX to submit the insider list if CJSC SPIMEX requests the insider lists for more than ten days.

2.4. Timeframes for performance of the obligation to submit to CJSC SPIMEX an insider list may be extended by CJSC SPIMEX in accordance with a written reasoned application (request) of the organization but for no more than 15 business days.

2.5. If an organization is not (was not on the date or within the timeframe specified in the written request (enquiry) of CJSC SPIMEX for submission of an insider list) an insider in accordance with the Law, it has no grounds for execution of the specified request (enquiry). In this case, the organization must within the period specified in the written request (enquiry) submit to CJSC SPIMEX a written notice of refusal in submission of the insider list stating the reason for such refusal.

2.6. Upon written request (application) of the organization which submitted the insider list, CJSC SPIMEX sends to such organization an acknowledgement of receipt of the above mentioned insider list containing information about the date of its receipt.

3. Methods of Submitting Insider Lists.

3.1. Insiders lists can be submitted by a legal entity (hereinafter referred to as the Organization) to CJSC SPIMEX using two alternative methods.

3.1.1. Submission of insider lists using information system of remote customer service of CJSC SPIMEX (hereinafter referred to as the "Personal Account") available on the main page of the Exchange's website at www.spimex.com.

3.1.2. Submission of insider list on an electronic medium in DBF (Data Base Format), XLS or XLXS format by mail (by registered letter with acknowledgement of receipt). Organization is entitled to independently choose the format in which the insider list is sent. The insider list on an electronic medium is provided accompanied by a paper copy of the insider list certified by an authorized representative of the Organization and the documents confirming the authority of the signatory. The Organization bears responsibility for the authenticity of paper and electronic forms of provided documents and for the letter of confirmation provided to the exchange in accordance with the form given in Appendix 1 hereto signed by an Authorized Person of the organization.

3.2. Insider lists are submitted by employees of the Organization authorized to carry out such actions (hereinafter referred to as the Authorized Person of the Organization) in the manner specified in paragraph 3.1.1. hereof based on a Letter prepared in accordance with the form given in Appendix 2 hereto (hereinafter referred to as the Letter). A paper letter containing information

about the Organization and its authorized persons is sent to postal address of CJSC SPIMEX. In case if the Letter is signed by a person acting under a power of attorney, the Letter shall be accompanied by a power of attorney (an original or a duly certified copy) confirming the authority of the person who signed the Letter.

3.3. In case of change of information about the Organization or its authorized persons specified in the Letter, the Organization provides a new Letter in the manner prescribed by par. 3.2 hereof.

3.4. When sending the insider list through its Personal Account, the Organization must pre-register in the Personal Account using electronic signature (hereinafter referred to as the “ES”) key certificate issued to the Authorized Person of the Organization by RDK (ZAO) Certification Authority. For the purposes of submitting the insider list using the Personal Account system, it is allowed to use the ES key certificates for one or more of the following scopes of application:

- 1.2.643.6.4.10.2 Client of the front office of CJSC SPIMEX;
- 1.2.643.6.4.10.4 Client of the back office of CJSC SPIMEX;
- 1.2.643.6.4.10.8 Client of CJSC SPIMEX.

Electronic message containing the insider list is generated by an Authorized Person of the Organization using the service of “Message Exchange via EDM (Electronic Document Management) System” in the Personal Account. A file must be attached to the message containing information about insiders which format must correspond to the format given in Appendix 3 hereto. The message parameters are set as follows:

- Recipient’s adapter: for automatic processing;
- Subject: INSIDE;
- Text: Left blank.

Appendix 1
to the Procedure for Submission of Insider Lists to CJSC SPIMEX

To: CJSC SPIMEX

In accordance with the Procedure for Submission of Insider Lists to CJSC SPIMEX (hereinafter referred to as the Procedure)

(organization name)

represented by _____,
authorized to perform the following actions in accordance with the above mentioned Procedure _____
(hereinafter referred to as the Organization)
confirms the authenticity of data provided in electronic and paper form and submitted to CJSC SPIMEX.

“ _____ ” _____ 20__

Position _____ signature/ _____/

Appendix 2
to the Procedure for Submission of Insider Lists to CJSC SPIMEX

To: President of CJSC SPIMEX

Letter

In accordance with the Procedure for Submission of Insider Lists to CJSC SPIMEX

(*organization name*)

represented by _____ acting under _____ (hereinafter referred to as the Organization) reports information about the Organization and its employees authorized to submit insider lists to CJSC SPIMEX (hereinafter referred to as the Authorized Person of the Organization) in order to receive the Organizer's employee individual code:

| | |
|---|--|
| Full name of the Organization | |
| Abbreviated name of the Organization | |
| INN (Taxpayer Identification Number)/ KPP (Tax Registration Reason Code) | |
| Place of the Organization's business address (in accordance with constituent documents) | |
| Postal address of the Organization | |
| Full name (family name, first name, patronymic) of the Authorized Person of the Organization | |
| Job title of the Authorized Person of the Organization | |
| E-mail address of the Authorized Person of the Organization | |
| Telephone number of the Authorized Person of the Organization | |

Organization assumes an obligation to immediately notify CJSC SPIMEX on termination of powers of the Authorized Person of the Organization and bears the risk of adverse effects caused by the breach of this obligation.

“ ____ ” _____ 20__

Position _____ signature/_____/

(Director of organization (Full name)
L.S. or another designated person.

Mark of CJSC SPIMEX:

Application received:

(full name of responsible person) (signature) (date)

Appendix 3 **to the Procedure for Submission of Insider Lists to CJSC SPIMEX**

Format of “Insider List” File

1. General Information.

Insider list is entered in the file of .xls format with the name “insiders_INN_DDMMYYYY.xls”, where

- “INN” means INN (Taxpayer Identification Number) of the Organization submitting the list (national registration number is specified for non-resident Organizations);
- “DDMMYYYY” means the date of preparing the list.

The file contains four tabs with the following names:

- Organization;
- Insiders_LE (legal entities);
- Insiders_PhP (physical persons);

2. Information about Organization Submitting the List of Insiders.

Information about the Organization submitting the list of insiders is specified in the “Organization” tab. The first line of the tab contains the header consisting of the following field names:

- Full name;
- Abbreviated name;
- INN;
- OGRN (Primary State Registration Number);
- Place of business address;
- Postal address;
- Telephone number;
- Fax number;
- E-mail address.

The second line contains the values of the fields specified in the header.

3. Information about Insiders which are Legal Entities.

Information about insiders which are legal entities is given in the tab “Insiders_LE”. The first line contains the header consisting of the following field names:

- Full name;
- INN;
- OGRN;
- Date of inclusion in the list;
- Grounds for inclusion in the list.

The second and the below lines contain values describing particular insiders in accordance with the table header. Each line contains information about one insider. Blank lines between the header and the rest of the lines, and between the lines with information about insiders are not allowed. If the list is empty, only the header is filled.

4. Information about Insiders which are Physical Persons.

Information about insiders which are physical persons is given in the tab “Insiders_PhP”. The first line contains the header consisting of the following field names:

- Number of identity document;
- Date of inclusion in the list;
- Grounds for inclusion in the list.

The second and the below lines contain values describing particular insiders in accordance with the table header. Each line contains information about one insider. Blank lines between the header and the rest of the lines, and between the lines with information about insiders are not allowed. If the list is empty, only the header is filled.

5. Comments about the Ways to Specify Particular Values.

“INN” field is left blank for insiders being nonresident legal entities.

“OGRN” field for insiders being nonresident legal entities must contain the national registration number assigned by a competent body of the relevant state.

Series and number of national passports are entered without spaces into in the field “identity document” for insiders who are resident physical persons

“Identity document” field for insiders being non-resident physical persons must contain a three-digit code (in accordance with All-Russian Classifier of the countries of the world) of the insider’s residence country, and below series and number of identity document of a citizen of the relevant state are entered after a space (series and number are specified without any spaces between them).

Date of inclusion in the list must be specified in accordance with the format DD.MM.YYYY. No use of additional symbols like “year”, etc. is allowed.