

# Memorandum for insiders of PAO Sovcomflot

## **INSIDER:**

- Is included into the List of Insiders of PAO Sovcomflot and received a notice on inclusion;
- Has access to insider information (the list is published at [http://scf-group.ru/investors/corporate\\_governance/internal\\_documents/](http://scf-group.ru/investors/corporate_governance/internal_documents/))

## **INSIDER IS OBLIGED TO:**

- Comply with requirements of laws and internal documents of PAO Sovcomflot related to inside;
- Inform on executed transactions with financial instruments of PAO Sovcomflot within 10 (ten) business days after the date of the inquiry from the Company;
- Maintain the procedure of execution of transactions in financial instruments of PAO Sovcomflot.

## **INSIDER REGULATORY DOCUMENTS:**

- Internal Control Rules to Prevent, Detect and Suppress the Misuse of Insider Information of PAO Sovcomflot and/or Market Manipulation;
- List of Insider Information of PAO Sovcomflot;

The documents are published at [http://scf-group.ru/investors/corporate\\_governance/internal\\_documents/](http://scf-group.ru/investors/corporate_governance/internal_documents/)

## **INSIDER IS PROHIBITED TO:**

- Disclose insider information;
- Use insider information for personal purposes or in the interests of third parties, including for execution of transactions with financial instruments of PAO Sovcomflot;
- Pass insider information to another person unless passed to other insider of PAO Sovcomflot to fulfill duties prescribed by law, a labor or civil contract;
- On the basis of insider information, provide recommendations, oblige or induce third parties to execute transactions with financial instruments of PAO Sovcomflot;
- Take steps representing market manipulations;
- **Make transactions for its own benefit or for the benefit of third parties relating to financial instruments of PAO Sovcomflot during the "Closed Periods":**
  - a) within thirty (30) calendar days prior to the date of publication of interim financial statements prepared under IFRS;
  - b) within sixty (60) calendar days prior to the date of publication of annual financial statements prepared under IFRS.

PAO Sovcomflot shall notify the said Insiders of Closed Period dates by specifying the dates of publication of financial statements, which are taken into account in determining Closed Period dates, in the Investor's Calendar on the Company's corporate website at <http://www.scf-group.ru;>  
<https://e-disclosure.ru/portal/company.aspx?id=11967>

Purchasing Financial Instruments of PAO Sovcomflot is allowed only for the purposes of long-term capital investment and not for any other purposes, such as short-term transactions. Insiders must have held Financial Instruments of the Company (directly or through other persons) for at least 6 (six) months before selling or otherwise disposing of them.

**NOTE!** These restrictions also apply to persons related to insiders, i.e. their spouses, children, and other close relatives