MAGNITOGORSK IRON AND STEEL WORKS

APPROVED BY:
Resolution of PJSC MMK's Board of Directors
Minutes No. 14 dated 23.04.2025
Chairman of the Board of Directors

_____ Viktor F. Rashnikov

Insider Information Policy of Public Joint Stock Company Magnitogorsk Iron & Steel Work

Magnitogorsk

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1. General provisions

1.1. This Insider Information Policy of Public Joint Stock Company Magnitogorsk Iron & Steel Works (hereinafter referred to as the 'Policy') governs relations within PJSC MMK (hereinafter referred to as the 'Company', 'MMK') and its interactions with external organizations and individuals related to insider information.

1.2. The Policy has been adopted to protect the rights and legitimate interests of MMK's shareholders and investors, ensure fair pricing of MMK securities, strengthen shareholder and investor confidence, and prevent the unlawful use of insider information and market manipulation.

1.3. The main objectives of this Policy are to establish the procedure for accessing insider information, the rules for protecting its confidentiality, and the control over compliance with the requirements of applicable legislation.

1.4. This Policy sets forth internal control rules for preventing, identifying, and stopping the unlawful use of insider information and/or market manipulation.

1.5. The requirements of this Policy apply to information that constitutes trade and commercial secrets, in areas not addressed by specific internal documents and local regulations of MMK.

2. Terms and definitions

The following terms with their respective definitions are used herein:

Current legislation	For the purposes of this Policy, the legislation of the Russian Federation;
Law	For the purposes of this Regulation, the Federal Law of the Russian Federation No. 224-FZ dated July 27, 2010, "On Counteracting the Unlawful Use of Insider Information and Market Manipulation, and Amending Certain Legislative Acts of the Russian Federation";
Corporate Secretary	MMK Corporate Secretary;
Investors	Entities engaged in investment activities that allocate their own, borrowed, or attracted funds in the form of investments and ensure their appropriate use.
Insider	A person with access to insider information by virtue of current legislation, employment duties, this Policy, other MMK internal documents, or under an executed agreement, as well as any other individual who obtained access to MMK's insider information;
Insider Information	Precise and specific information regarding MMK's operations, securities, and related transactions that has not been made public, whose disclosure could materially impact the price of these securities, including information classified as trade and

	commercial secrets, the safeguarding and usage of which are governed by specific documents and regulations of MMK.
Prevention	Preventing, identifying, and stopping the unlawful use of insider information and/or market manipulation.
Head of structural unit	MMK structural unit (department) head assigned to enforce this Policy's requirements;
Securities	Emission securities of Public Joint Stock Company Magnitogorsk Iron and Steel Works (including shares or other instruments) admitted to trading on organized markets in the Russian Federation, and/or for which an application for admission to such trading has been submitted, including financial instruments whose price depends on these securities;
Members of the Company's governing bodies	Persons serving as members of MMK's Board of Directors, members of the collective executive body (MMK Management Board), and the individual holding the position (performing the functions) of MMK's sole executive body

3. Insider Information

3.1. MMK's insider information is defined as information that meets each of the following criteria:

- directly relates to MMK;
- it is accurate and concrete;
- it is not accessible to the public / has not been disclosed yet.
- if it were publicly available / published, it could materially affect the price of MMK's shares or other securities.

3.2. Information is deemed capable of 'materially affecting' securities' value if potential investors might rely on it when making investment decisions and it could impact such decisions.

3.3. The list of MMK's insider information is formally approved by the Sole Executive Body – MMK's General Director and published on MMK's official website at www.mmk.ru. Approval intervals are set according to updates in Russian legislation or the Company's identified needs.

4. Insiders

4.1. For the purposes hereof, insiders are defined as the following individuals who have access to MMK's insider information:

4.1.1. individuals with access to MMK's insider information based on contracts with MMK, including auditors (auditing organizations), appraisers (legal entities with whom appraisers have employment contracts), professional securities market participants, credit organizations, foreign banks operating in the Russian Federation

through their branches in accordance with the Federal Law "On Banks and Banking Activities," insurance organizations, and foreign insurance companies authorized under Russian Federation Law No. 4015-1 of November 27, 1992 "On the Organization of Insurance Business in the Russian Federation" to conduct insurance activities within the territory of the Russian Federation;

4.1.2. individuals who have the right to directly or indirectly (through controlled entities) dispose of at least 25% of the voting rights in the Company's supreme governing body, as well as individuals who, by virtue of their shareholding in MMK's charter capital, have access to insider information under federal laws, the Charter, or MMK's internal documents;

4.1.3. members of the Company's governing bodies;

4.1.4. individuals with access to information regarding the preparation and/or submission of a voluntary, mandatory, or competing offer for the acquisition of securities, notification of the right to demand the redemption of securities, or a demand for the redemption of securities under Chapter XI.1 of the Federal Law "On Joint Stock Companies", including those who submitted to MMK a voluntary, mandatory, or competing offer, a notification of the right to demand the redemption of securities, or a demand for the redemption of securities, as well as banks or other credit organizations that provided a bank guarantee, and appraisers (legal entities with whom appraisers have entered into labor contracts).

4.1.5. information agencies that disclose information about MMK.

4.1.6. entities assigning ratings to MMK and its securities.

4.1.7. physical persons with access to insider information of MMK based on employment and/or civil law contracts with MMK.

4.1.8. other individuals recognized as insiders under the law.

5. Restrictions on use of insider information. Prohibition of market manipulation.

5.1. The use of insider information is prohibited:

- for executing operations with MMK securities on one's own account or on behalf of a third party, unless these operations are part of fulfilling a buy or sell obligation that has matured, provided such obligation arose from a transaction conducted before the person learned the insider information.
- by conveying it to another person, except when the information is shared with a person listed as an insider for the purpose of fulfilling obligations established by federal laws, employment duties, or contract obligations.
- by advising third parties, forcing, or otherwise urging them to buy or sell MMK securities.

5.2. An insider may not engage in actions classified as market manipulation under the Law.

5.3. Individuals who are members of the Company's governing bodies, along with their associated parties, are prohibited from executing transactions, in their own

name or on behalf of third parties, related to MMK securities during a closed period of 30 calendar days before publication of:

- interim or annual accounting (financial) statements;
- interim or annual consolidated financial statements.

5.4. MMK's investor relations department head annually provides the Company's governing body members with the reporting publication schedule specified in section 5.3.

6. List of insiders. Requirements for maintaining and distributing the list of MMK insiders.

6.1. MMK keeps and regularly updates its list of insiders.

6.2. The responsibility for maintaining and updating the list of insiders at MMK lies with the Corporate Secretary.

6.3. Procedure for including individuals in the MMK insider list:

6.3.1. The head of the structural unit appoints a responsible person within the unit by order to manage the inclusion of employees in the list of individuals with access to insider information (or their removal from the list). The head of the structural unit designates the employees in their unit who have access to insider information.

The list of individuals with access to insider information is submitted to the Corporate Secretary via the electronic document management system, signed by the head of the structural unit, no later than the next business day after the grounds for including that person in the MMK insider list arise.

6.3.2. The list of legal entities with access to MMK insider information is compiled by the Corporate Secretary after contracts are signed with such entities, based on information provided by the heads of structural units overseeing those contracts.

6.3.3. The heads of structural units overseeing the contracts that may involve the transfer of insider information provide the Corporate Secretary with a list of counterparties for those contracts and the information specified in items 6.4.1 and 6.4.2 of this Policy no later than the next business day after the contract is signed.

When signing contracts with legal entities gaining access to insider information, the heads of structural units overseeing these contracts must inform the respective parties about the requirements of the Law, related regulations, this Policy, and the consequences of unlawful use of insider information, as well as that the parties will be included in the insider list.

6.3.4. Upon receiving a letter from the head of the structural unit, the Corporate Secretary drafts a Notification regarding the inclusion (or exclusion) of an individual in the MMK insider list (Annexes 1.1, 1.2) and communicates it to the insider (or the excluded individual) using one of the following methods:

- as an electronic document transmitted using software tools and the Internet.
- As an electronic document through MMK’s corporate communication systems and tools, including email (for insiders referred to in sections 7 and 13 of Article 4 of the Law);

- by sending a registered mail with acknowledgment of receipt (or another registered mail with sender acknowledgment) or by delivering it through a courier service (or another method that allows confirmation of receipt).

The Notification must be sent no later than 7 working days after the individual is added to (or removed from) the MMK insider list.

The Bank of Russia defines additional requirements for notifying insiders about their inclusion in or removal from the insider list.

6.3.5. The inclusion in (or exclusion from) the MMK insider list and the sending of corresponding Notifications regarding individuals specified in sections 4.1.2 and 4.1.3 of this Policy are carried out by the Corporate Secretary based on the information available to him/her in the course of his/her duties.

Members of the Company's governing bodies notify on their own the persons associated with them of the obligations of the members in accordance with this Policy.

6.3.6. The Corporate Secretary keeps track of all notifications that have been sent. Full information about sent notifications is retained by MMK for five years from the date an individual has been removed from the MMK insider list.

6.4. MMK's insider list contains the following information:

6.4.1. With respect to natural persons:

- last name, first name, patronymic (the last one - if applicable);
- date of birth;
- place of birth (if such information is available);
- passport data (series, number);
- registration address;
- personal phone number (if available);
- work phone number (if available);
- e-mail address;
- the position held by the individual at MMK (if applicable);
- personal identification number for MMK employees;
- grounds for inclusion in (or exclusion from) the list, specifying the paragraph number of Article 4 of the Law.
- the date of inclusion in (or exclusion from) the list.

6.4.2. With respect to legal persons:

- full company name (for an insider (individual excluded from the list) that is a Russian legal entity - commercial organization), name (for an insider (individual excluded from the list) that is a Russian legal entity - non-commercial organization, foreign legal entity, or foreign organization not recognized as a legal entity under the law of the country where it was established);
- location and/or mailing address (if available);
- OGRN, INN (if available) (for an insider (individual excluded from the list) that is a Russian legal entity);
- Foreign Company Code (if available) andhttps://login.consultant.ru/link/?req=doc&base=LAW&n=486066&dst=100010 All-Russian Classifier of Countries of the World (for an insider (individual excluded from the list) that is a foreign legal entity or foreign organization not

recognized as a legal entity under the law of the country where it was established, not having OGRN and INN but possessing Foreign Company Code)
- Registration number in the country of registration (for an insider (individual excluded from the list) that is a foreign legal entity or foreign organization not recognized as a legal entity under the law of the country where it was established, not having OGRN, INN and Foreign Company Code)
- grounds for inclusion in (or exclusion from) the list, specifying the paragraph number of Article 4 of the Law.
- the date of inclusion in (or exclusion from) the list.

6.5. The Corporate Secretary presents the MMK insider list to trading organizers executing transactions with MMK securities and submits it to the Bank of Russia upon their written request in accordance with established procedures.

6.6. The Corporate Secretary is assigned the duty of:

- maintaining the insider list;
- timely sending notifications on inclusion of a person in the list (removal from the list) of MMK insiders;
- timely informing the persons included in the list of MMK insiders in accordance with the procedure established herein about the requirements of the Law;
- providing the list of MMK's insiders to trade organizers and to the Bank of Russia upon their request;
- performing other actions envisaged by this Policy for the Corporate Secretary.

6.7. The Corporate Secretary retains lists of individuals with access to insider information for at least five years after their compilation or update.

7. Procedures for accessing insider information and measures to protect its confidentiality.

7.1. The Company adheres to the following principles for organizing processes to ensure access to insider information, its preservation, and protection:

- compliance with ethical standards;
- continuous and efficient process for ensuring the protection and preservation of insider information;
- prevention of conflicts of interest when handling insider information;
- compliance of measures for protecting insider information, including prevention, detection, and stopping its unlawful use, with the nature and scale of the company's activities.

7.2. Access to insider information is granted following notification of inclusion in the insider list and is terminated upon exclusion from the list.

7.3. Individuals on the MMK insider list have access to insider information solely in the course of fulfilling their job responsibilities or contractual obligations.

7.4. Insider information may be provided to legal entities based on signed agreements after those entities are included in the insider list.

7.5. Insider information may be disclosed to individuals not included in the insider list only in cases permitted by applicable law.

7.6. Any individual not on the Company's insider list and without access rights to insider information, who nevertheless gains access for any reason, is required to:

- cease reviewing it.
- take all necessary measures to protect the confidentiality of this insider information;
- prevent the dissemination or disclosure of such insider information.
- promptly report the access to insider information to the immediate superior.

7.7. Measures to ensure the confidentiality of insider information are implemented in accordance with MMK’s internal regulations.

8. Internal control rules for preventing, identifying, and stopping the unlawful use of insider information and/or market manipulation.

8.1. Objectives, tasks, and methods of internal control.

Internal control in the field of preventing, identifying, and stopping the unlawful use of insider information and/or market manipulation ('Prevention') is carried out to ensure MMK's compliance with the requirements of the Law and related regulatory acts.

The main tasks of internal control in the area of Prevention are to prevent, detect, and stop the unlawful use of insider information and/or market manipulation, as well as to eliminate the conditions for such unlawful use, including through:

- compliance with the procedures and timelines for disclosing insider information (specific types of insider information) of the Company.
- ensuring compliance with the procedures for accessing insider information, confidentiality protection rules, and monitoring adherence to the Law and related regulatory acts.
- compliance with internal control rules in the field of Prevention.
- compliance with the trading organizer’s internal documents, which outline actions aimed at preventing, detecting, and stopping violations of the Law and related regulations.
- compliance with this Policy.

The methods of internal control for related to Prevention are defined by the Company’s internal documents governing the internal control system.

8.2. Compliance with the Law and related regulatory requirements by MMK is monitored by a structural unit (official) reporting to and accountable to the Sole Executive Body – the General Director of MMK (hereinafter, the responsible unit/official). This monitoring is conducted as part of the internal audit system, which provides systematic, independent assessments (analysis) of the reliability and effectiveness of risk management, internal control, and corporate governance systems, in accordance with MMK’s internal regulatory documents.

8.3. The functions of the responsible structural unit (or official), as well as the rights and obligations of its head, are defined by the applicable provisions of the Central Bank of Russia’s regulation on internal control requirements for Prevention.

8.4. The responsible structural unit (or official) submits reports on Prevention

activities (in the format of Annex 2) to the Sole Executive Body – the General Director of MMK. The deadlines and frequency of their submission are determined by MMK's internal regulation governing internal audit, internal control, and risk management activities.

8.5. The Corporate Secretary assesses, via a prescribed questionnaire procedure, compliance of actions by members of the Company's governing bodies (relevant employees, including their subordinates, if any, and Company employees who are neither members of the responsible unit nor the responsible official) with Prevention requirements and Company documents.

8.6. The Company's internal documents (policies, rules, instructions, etc.) outline measures to support the responsible unit (or official) in carrying out its (their) duties efficiently and without obstacles.

8.7. The independence of the responsible structural unit (official) from other units (officials) whose activities are monitored under this Policy may be ensured by informing them of the responsible official's status, rights, and duties, including the right to report to the Sole Executive Body – the General Director of MMK – any instances hindering his/her functions, as well as through establishing a compensation system and reward structure for the responsible structural unit (or responsible official).

8.8. If the head of the responsible unit (official) is temporarily absent, continuity of Prevention activities is maintained by designating an acting head in accordance with MMK's internal regulations and Bank of Russia requirements.

8.9. Performance of the responsible unit's (official's) functions is allowed in conjunction with other duties, if no conflict of interest exists.

To avoid conflicts of interest, the responsible structural unit or official does not participate in operations directly related to the Company's controlled activities.

8.10. The procedure for the responsible structural unit (official) to conduct internal control in the field of Prevention is defined by MMK's internal regulations governing internal control and risk management activities.

8.11. Annually, the responsible structural unit or official assesses the relevance of Prevention internal control rules and, if necessary, revises them in accordance with Article 11 of this Policy.

8.12. MMK employees are required to:

- strictly comply with the Prevention laws, related regulations, and the provisions of this Policy.
- report without delay to their immediate superior or the head of internal control any data regarding potential or committed violations of Prevention-related laws, founding documents, and internal policies.

8.13. The responsible unit (official) retains Prevention internal control documents for at least five years from the date of their compilation, approval (signing), and/or review.

9. Procedure and deadlines for insiders to submit Notifications. Information Disclosure

9.1. Upon the MMK Corporate Secretary's request, insiders must provide a notification of completed securities transactions within the specified period, which should not be less than 10 business days from the date the request is received.

9.2. The notification is prepared by filling out a standard form (Appendix 3.1 and 3.2) and submitted as an electronic document in one of the following ways chosen by the insider:

- using software and hardware tools and the Internet (if available);
- using electronic storage devices (CD, flash drive) delivered by courier or registered mail with acknowledgment of receipt;
- using software hosted on MMK's official website in the Internet (if available).
- via email by sending the information to shareholder@mmk.ru.

9.3. If circumstances prevent an insider from responding to a request in electronic form via the methods specified in Section 9.2 of this Policy, the insider must provide a written response on paper, delivered by courier or registered mail with acknowledgment of receipt.

9.4. The insider's notification of completed transactions sent on paper must bear the insider's signature or that of their authorized representative; for legal entities, it must be sealed (if a seal is available).

If the paper notification consists of more than one page, it should be stitched and numbered. If the notification is sent by a legal entity, the paper must be secured with the entity's seal on the stitching and authenticated with an authorized signature. If the notification is sent by an individual, each page of the paper document must be signed by that insider.

If the notification is sent on behalf of the insider by an authorized representative, a power of attorney (a duly certified copy) or another document (a duly certified copy) establishing the representative's authority must accompany the notification.

9.5. If the response to the request is provided in the manner described in the third paragraph of Section 9.2 of this Policy, the insider should submit the response as a file with one of the following extensions chosen by the insider: ".dbf", ".xls", ".xlsx", ".txt", ".csv".

9.6. The response to the request on an electronic storage medium (CD, flash drive) must be provided by the insider along with a cover letter in hard copy.

9.7. If the response to the request includes a requirement for acknowledgment of receipt, MMK must provide the insider with confirmation of receipt no later than 2 business days after receiving the response.

9.8. The insider is required to file the extension request, while MMK must issue the extension notice, refusal notice, or acknowledgment of receipt in a way that confirms receipt by the addressee.

9.9. Any further requirements for the procedure and timing of insider information disclosure are set by the Bank of Russia's regulatory document.

9.10. The Bank of Russia's regulatory acts determine the process and timelines for disclosing insider information, as listed in its regulations, unless the Law specifies a different disclosure procedure.

MMK insider information not included in the Bank of Russia's approved list is disclosed according to the procedure and deadlines set by the Bank of Russia's regulatory act for issuers of securities reporting significant events (actions) that, in the issuer's opinion, materially affect the value or quotations of their securities.

9.11. The Russian Government may define circumstances under which insider information can be disclosed in a limited manner and/or volume, the list of such information, the types of insider information exempt from disclosure, and the individuals whose insider information may remain undisclosed.

10. Ответственность

10.1. Insiders are liable for the unauthorized disclosure and use of MMK insider information in accordance with applicable laws, MMK's regulatory documents, job responsibilities, and the terms of agreements signed with MMK.

10.2. Heads of structural units (departments) bear responsibility for:

- delayed submission to the Corporate Secretary of the list of individuals with access to insider information.
- informing counterparties that the information provided to them qualifies as insider information;
- complying with other applicable requirements set forth in this Regulation.

10.3. The Corporate Secretary bears responsibility for:

- keeping, updating (revising), and securing the storage of MMK insider lists.
- timely notifying individuals that they have been added to (or removed from) the MMK insider list;
- keeping track of all notifications sent to and received from insiders;
- promptly sending the MMK insider list to the Bank of Russia and trading organizers handling transactions in financial instruments, foreign currency, and/or goods, when requested.
- disclosing MMK insider information as required by law.
- timely posting of the insider information list on MMK's corporate website.
- complying with other applicable requirements set forth in this Regulation.

10.4. The responsible structural unit (official) bears responsibility for:

- monitoring MMK's compliance with the requirements of the Law and the regulations adopted in accordance with it;
- fulfilling other applicable requirements for the responsible official as outlined in this Policy.

11. Procedure for approving and amending the Policy

11.1. This Policy is approved by the Board of Directors. The decision to approve it is made by a majority vote of the Board of Directors members participating in the meeting.

11.2. Amendments and additions to the Policy are made following the same procedure as its approval.

11.3. If, as a result of changes in the current legislation, certain clauses of this Policy come into conflict with the current legislation, such clauses become invalid. Until amendments are made to the Policy, the current legislation prevails.

Annex No. 1.1

Notification of an individual's inclusion in (or exclusion from) the insider list.

1	Information about the notification	
1.1	Notification serial number and date of issuance	
2	Information regarding the notifying person	
2.1	Full company name	Public Joint Stock Company Magnitogorsk Iron and Steel Works
2.2	Location and/or mailing address	93, ul. Kirova, Magnitogorsk, Chelyabinsk Region, 455000, Russia.
2.3	Primary state registration number (OGRN) Taxpayer identification number (INN)	1027402166835 7414003633
2.4	Internet:	www.mmk.ru
2.5	Contact phone number and/or email address for insiders (individuals excluded from the list)	24-39-69, 25-45-73 shareholder@mmk.ru
2.6	The item number of Article 4 of Federal Law No. 224-FZ dated July 27, 2010, classifying the notifying individual as an insider.	Issuer (item 1 of Article 4 of the Law)
3	Information about the insider (person excluded from the list)	
3.1	Last name, first name, patronymic (the last one - if applicable);	
3.2	Date of birth	
3.3	Place of birth (if such information is available);	
3.4	The position held by the insider (or individual excluded from the list) at MMK, if applicable.	
3.5	Financial instrument	
3.6	Grounds for including the insider in the list	
3.7	The grounds under which the insider (or individual removed from the list) ceased to meet the requirements of Article 4 of Federal Law No. 224-FZ dated July 27, 2010.	
3.8	Information on the insider's inclusion in the list (or exclusion of the individual from the list) and the date of such inclusion (or exclusion).	

4	Information notice on the requirements of Federal Law No. 224-FZ dated July 27, 2010, as specified in paragraph 2 of part 1 of Article 9 of the same law. Please note that upon an individual's inclusion in the MMC insider list, restrictions apply to that individual as an insider, as stipulated by Article 6 of Federal Law No. 224-FZ dated July 27, 2010, "On counteracting the improper use of insider information and market manipulation and amending certain legislative acts of the Russian Federation" (hereinafter referred to as the Law) and the "MMK Insider Information Policy". Responsibilities are defined in accordance with Article 5 of the Law and the "MMK Insider Information Policy", while obligations are imposed on the individual as outlined in Article 10 of the Law and the "MMK Insider Information Policy". You can access the insider information list at: https://mmk.ru/ru/investor/information-for-shareholders/documents-for-shareholders/. You can access the MMK Insider Information Policy at: http://www.mmk.ru/corporate_governance/internal_documents/group_documents/.

Corporate Secretary of PJSC MMK _____ (signature) _____ (full name)

"___" _____ 20__
(signature date)

Annex No. 1.2

Notification of a legal entity's inclusion in (or exclusion from) the insider list.

1	Information about the notification	
1.1	Notification serial number and date of issuance	
2	I. Information regarding the notifying person	
2.1	Full company name	Public Joint Stock Company Magnitogorsk Iron and Steel Works
2.2	Location and/or mailing address	93, ul. Kirova, Magnitogorsk, Chelyabinsk Region, 455000, RUSSIA.
2.3	Primary state registration number (OGRN) Taxpayer identification number (INN)	1027402166835 7414003633
2.4	Internet:	www.mmk.ru
2.5	Contact phone numbers and/or email address for insiders (individuals excluded from the list)	24-39-69, 25-45-73 shareholder@mmk.ru
2.6	The item number of Article 4 of Federal Law No. 224-FZ dated July 27, 2010, classifying the notifying individual as an insider.	Issuer (item 1 of Article 4 of the Law)
3	Information regarding the insider (or individual excluded from the list) that is a Russian or foreign legal entity (or a foreign organization not recognized as a legal entity under the law of the country where it was established).	
3.1	Full company name (for an insider (individual excluded from the list) that is a Russian legal entity - commercial organization), name (for an insider (individual excluded from the list) that is a Russian legal entity - non-commercial organization, foreign legal entity, or foreign organization not recognized as a legal entity under the law of the country where it was established)	
3.2	Location and/or mailing address (if available);	
3.3	OGRN, INN (if any)	
3.4	Foreign Company Code (if any) and All-Russian Classifier of Countries of the World	
3.5	Registration number in the country of registration	
3.6	Financial instrument	
3.7	Grounds for including the insider in the list	

3.8	The grounds under which the insider (or individual removed from the list) ceased to meet the requirements of Article 4 of Federal Law No. 224-FZ dated July 27, 2010.	
3.9	Information on the insider's inclusion in the list (or exclusion of the individual from the list) and the date of such inclusion (or exclusion).	
4	Information notice on the requirements of Federal Law No. 224-FZ dated July 27, 2010, as specified in paragraph 2 of part 1 of Article 9 of the same law. Please note that upon an individual's inclusion in the MMC insider list, restrictions apply to that individual as an insider, as stipulated by Article 6 of Federal Law No. 224-FZ dated July 27, 2010, "On counteracting the improper use of insider information and market manipulation and amending certain legislative acts of the Russian Federation" (hereinafter referred to as the Law) and the "MMK Insider Information Policy". Responsibilities are defined in accordance with Article 5 of the Law and the "MMK Insider Information Policy", while obligations are imposed on the individual as outlined in Article 10 of the Law and the "MMK Insider Information Policy". You can access the insider information list at: https://mmk.ru/ru/investor/information-for-shareholders/documents-for-shareholders/. You can access the MMK Insider Information Policy at: http://www.mmk.ru/corporate_governance/internal_documents/group_documents/.	

Corporate Secretary of PJSC MMK _____ (signature) _____ (full name)

"___" _____ 20__
(signature date)

Annex No. 2

I have read and acknowledged the report.
General Director, PJSC MMK.
_____ Pavel V. Shilyaev
____ _____ 20

Activity Report on Counteracting the Unlawful Use of Insider Information and Market Manipulation for _____.

(reporting period)

Date of report: _____

Section 1: Monitoring the maintenance of the insider list and informing individuals added to or removed from the list, as well as advising them on the requirements of Federal Law No. 224-FZ dated July 27, 2010, and providing the insider list to the Bank of Russia and/or the trading organizer:

1.1. Information on notifications sent during the reporting period (quantity, grounds):

- About inclusion of persons in the list of insiders: _____;
- About exclusion from the insider list: _____;

1.2. Details regarding adherence to timelines for inclusion in the insider list (exclusion from the list): _____;

1.3. Details regarding the revision of the insider list during the reporting period: _____;

1.4. Details of requests for the insider list received and fulfilled during the reporting period:

- from the Bank of Russia: _____;
- from the trading organizer: _____

Section 2: Monitoring compliance with Russian legislation on Prevention:

2.1. Information on all identified violations of Russian legislation regarding Prevention, including the reasons for the violations and the responsible parties:

#	Information regarding identified violations	Reasons for the violations and the responsible parties:	Measures Taken and Recommendations
1.			

2.2. Information on potential and/or occurring regulatory risk events related to Prevention during the reporting period: _____
_____.

Section 3: Review of complaints and appeals related to the unlawful use of insider information."

☐ no complaints or appeals were received by MMK during the reporting period.

☐ during the reporting period, MMK received ___ complaints or appeals.

☐ as a result of handling the received complaints or appeals, no violations were identified.

☐ the complaints/appeals received revealed violations; details are provided in Section 2 of the report.

Section 4: Details regarding the revision of internal control procedures related to Prevention in the reporting period:

_____.

Head of responsible structural unit (designated official)

_____ _____

(signature) (full name)

Annex No. 3.1

NOTIFICATION on carrying out the operations with issuance securities of PJSC MMK by an insider – natural person

#	I. Information about the individual included in the MMK insider list	
1.1	Last name, first name, patronymic (the last one - if applicable);	
1.2	Date of birth	
1.3	Place of birth (if such information is available);	
1.4	Position held by the individual at MMK (if applicable)	
1.5	Contact phone number	
	II. Data with regard to the grounds of notification	
2.1	Details on inclusion of a person into the insider list	
2.2	Grounds for inclusion of a person into the insider list	
	III. Data on the operation with issuance securities	
3.1	Name of the securities, date, and registration number of the issuance.	
3.2	Number of securities purchased or sold	
3.3	Price (per one security)	
3.4	Party to the contract	
3.5	Date of transaction(s) (date of carrying out the operation)	
3.5	Place of transaction(s)	

_____ _____

(signature) (full name)

"___" _____ 20__

(signature date)

Annex No. 3.2

NOTIFICATION on carrying out the operations with issuance securities of PJSC MMK by an insider – legal person

#	I. Information about the legal person included in the MMK insider list	
1.1	Full company name (for an insider that is a Russian legal entity - commercial organization), name (for an insider (individual excluded from the list) that is a Russian legal entity - non-commercial organization, foreign legal entity, or foreign organization not recognized as a legal entity under the law of the country where it was established)	
1.2	Location and/or mailing address (if available);	
1.3	OGRN, INN (if any)	
1.4	Foreign Company Code (if any) and All-Russian Classifier of Countries of the World	
1.5	Registration number in the country of registration	
	II. Data with regard to the grounds of notification	
2.1	Details on inclusion of a legal person into the insider list	
2.2	Grounds for including a legal person into the insider list	
	III. Data on the operation with issuance securities	
3.1	Name of the securities, date, and registration number of the issuance.	
3.2	Number of securities purchased or sold	
3.3	Price (per one security)	
3.4	Party to the contract	
3.5	Date of transaction(s) (date of carrying out the operation)	
3.5	Place of transaction(s)	

Head of legal entity _____ _____
(position) (signature) (full name)

"___" _____ 20__
(signature date)