

Approved by

The Board of Directors of PAO “TMK”

On 26 April, 20148

Minutes № 23 dated 27 April, 2018

REGULATIONS ON THE INFORMATION POLICY OF PAO “TMK” (restated)

1. General provisions

- 1.1 The present Regulations on the Information policy (hereinafter referred to as the “Regulations”) of PAO “TMK” (hereinafter referred to as the “Company”, “PAO “TMK””) have been elaborated in accordance with the Civil code of the Russian Federation, the Federal Law “On Joint stock companies”, the Federal Law “Concerning the State registration of legal entities and private entrepreneurs”, the Federal Law “On Securities market”, the Federal Law “Concerning the illegal usage of insider information and market manipulation and concerning the introduction of changes to certain legislative acts of the Russian Federation”, Regulations of the Bank of Russia dated 30.12.2014 № 454-II “Concerning the disclosure of information by the issuers of registrable securities”, Regulations of the Bank of Russia dated 01.06.2016 № 546-II “Concerning the list of information provided by the issuers to the central securities depository, order and terms of its provision, as well as the requirements to the order of the provision of access to such information by the central securities depository” and other regulatory acts of the Bank of Russia, the Corporate governance code approved by the Board of Directors of the Bank of Russia on 21 March, 2014, the Order of FFSM dated 28.02.2012 № 12-9/ПЗ-Н “Concerning the approval of the Regulations on the order and terms of the disclosure of insider information of the persons specified in points 1 – 4, 11 and 12 of Article 4 of the Federal law “Concerning the illegal usage of insider information and market manipulation and concerning the introduction of changes to certain legislative acts of the Russian Federation”, Moscow Exchange’s Listing Rules approved by the Supervisory board of Moscow Exchange on 26.06.2017, certain regulatory acts of the Bank of Russia and other regulatory acts of the Russian Federation, the Articles of Association, Regulations on the Insider information of the Company and other internal documents of the Company.
- 1.2 The present Regulations are the internal document of the Company which determine principles, rules and approaches to the information disclosure, list of such information and documents subject to disclosure to the shareholders as well as potential investors and other interested persons, as well as determines the order and terms of such disclosure.
- 1.3 The information policy of the Company is directed to the full and complete satisfaction of informational needs of the shareholders and other interested persons in authentic information about the Company and its activity, and provision of a free and easy access to such information.
- 1.4 The Company carries out the mandatory information disclosure in accordance with the current laws of the Russian Federation, regulatory acts of the Bank of Russia and rules

for permission of securities to trading transactions and listing rules on stock exchanges where the securities of the Company are listed.

For the improvement of the informational publicity and transparency of the Company which increases its investment attractiveness, the Company shall be entitled to carry out any additional information disclosure in accordance with the recommendations from the Bank of Russia, the present Regulations and other internal documents of the Company, as well as decisions taken by the governing bodies of the Company.

- 1.5 In accordance with the current laws of the Russian Federation and the Regulations on Insider information of the Company, the Company shall ensure protection of the information which is considered as classified, business or commercial secret as well as the insider information.
- 1.6 The information about the Company and its activity shall be disclosed in Russian and if required so, in English.
- 1.7 The General Director of the Company and the Deputy General Director for Strategy and Development shall be responsible for authenticity and completeness of the disclosed information about the Company and its activity.
- 1.8 The present Regulations shall be implemented by the executive governing bodies of the Company, the corporate secretary of the Company as well as by the authorized divisions in accordance with the internal regulations on the information disclosure.
- 1.9 The monitoring over the compliance with the information policy shall be performed by the Board of Directors of the Company.

2. Purpose and principles of information disclosure

- 2.1 The purpose of the information disclosure about the Company and its activity shall be the provision of the authentic, non-contradictory, objective and complete information to the shareholders and other interested persons in scope which is required for taking a deliberate decision on the participation in the Company.
- 2.2 The main principles for the disclosure of the information about the Company and its activity shall be regularity, consistency and promptness of its provision; equal rights of all the shareholders and other interested persons in receipt of the information about the Company and its activity taking into account any limitations imposed by the laws of the Russian Federation; accessibility, authenticity, completeness and comparability of the disclosed data; a reasonable balance between the publicity of the Company and respect of its commercial interests; compliance with the confidentiality rules in respect of the insider information of the Company.
- 2.3 For the purposes of the implementation of the regularity, consistency and promptness of the disclosure the Company shall ensure:
 - a) Continuity of a disclosing process. For this purpose, the Company adopted certain regulations on interaction at the disclosure of the information, which determine

coordination rules between the organizational divisions of the Company and the continuity of the disclosing process.

- b) The disclosure of information, which can impact the value of the Company and the value of its securities, within the shortest period of time;
- c) Synchronized and equivalent disclosure of the material facts in the Russian Federation and abroad. The equivalence of the disclosure of the information means that in case of its disclosure on the regulated markets in one country the same and equal information shall be disclosed in any other country, whose regulated markets the securities of the Company are listed on;
- d) The prompt provision of the information about the position of the Company in respect of any rumors or false information which may form a distorted opinion about the value of the Company and the value of its securities and which can expose to risk the interests of the shareholders and investors.

2.4 For the purpose of the implementation of the accessibility principle of the disclosure the Company shall use various channels and means of the disclosure, in the first place digital ones which are available for most of the interested persons. The dissemination channels used by the Company shall ensure a free and easy access for the interested persons to the disclosed information of the Company. The access to such information shall be granted on a free basis and shall not require any special procedures (obtaining passwords, registration or other technical limitations) in order to get acquainted with it.

2.5 For the purpose of the implementation of the principles of the authenticity, completeness and comparability of the disclosed information the Company shall aim to achieve that:

- a) the disclosed information is understandable and non-contradictory and the provided data is comparable (the data can be compared with the Company's key figures in different periods as well as they can be compared with the key figures of the similar companies);
- b) the information provided by the Company is objective and balanced. During the presentation of its activity the Company shall not evade from the disclosure of any negative information about itself, which can be considered as material for the shareholders and investors;
- c) at the disclosure of the financial and other information its impartiality, that is independence of its disclosure from interests of any persons or groups, shall be procured. The information is not considered impartial, if the choice of its contents or its form is aimed at the achievement of certain results or consequences.

3. Means and sources of the information disclosure

3.1 The disclosure of the information about the Company and its activity shall be implemented by way of distribution of the information by the following means:

3.1.1 *Communication of the information via newlines and digital media.*

The Company shall publish notifications, press releases and other information in the digital media as and when required to make such publication.

Corporate event notice, amendment notices the disclosure of which is mandatory for the Company, notifications regarding the order of access to the insider information which is contained in the documents of an insider, information on securities (additional) issues, information on a securities issue prospectus and other information are communicated through certain informational resources updated in real time manner and provided by the disseminator of such information on the securities market (hereinafter referred to as the “Newline”), which is an information agency authorized in a due order for the conduction of actions related to the disclosure of information on securities and other financial instruments (hereinafter referred to as the “Disseminator of Information on the securities market”). The disclosure of such information by other means until its publication on the Newline is not allowed.

The communication of the information mandatory for disclosure by the Company through the Newline shall be implemented within the following terms:

- a) Corporate event notices – not later than the 1st day from the date of the corporate action itself (not later than 10.00 am of the day following the one when the corporate event took place);
- b) amendment notices the disclosure of which is mandatory for the Company, except for notifications regarding the planned date of submission of applications for making an entry in the unified state register of legal entities related to the reorganization, termination of activity or liquidation of the Company, - not later than the 1st day from the moment of the occurrence of such event; notifications regarding the planned date of submission of applications for making an entry in the unified state register of legal entities (hereinafter referred to as the “USRLE”) related to the reorganization, termination of activity or liquidation of the Company – not later than 4 working days from the date of delivery of an application for making such entry in the USRLE to an authorized governmental body by the Company;
- c) information on securities (additional) issues; on a securities issue prospectus; information disclosed by issuers of mortgage bonds; information disclosed by issuers of Russian global depository receipts, disclosure of which is mandatory in accordance with the Russian Federation and the regulatory acts of the Bank of Russia, - within the terms established by the laws of the Russian Federation and the regulatory acts of the Bank of Russia;
- d) notifications on order of access to the insider information contained in the documents of the Company – not later than 10.00 am of the day following the one of the publication of the text of the document containing the insider information of an insider, on the Internet;

- e) information provided by the Company to a corresponding authority (entity), regulating the foreign securities market, to a foreign securities market operator and (or) other authorized bodies disclosed by the Company on the Internet – within the day of the publication, on the Internet, of those documents containing information provided to a corresponding authority (entity), regulating the foreign securities market, to a foreign securities market operator and (or) other authorized bodies.

In case of communication of the information through the Newslines by the Company, the Company or any person authorized by it simultaneously with the communication of such information on the Newslines shall notify the securities market operator about the contents of such information. Such notification shall be forwarded to the securities market operator in the order agreed with the operator.

In case any employees or executive officers of the Company including the members of the Board of Directors of the Company, before the communication of the corresponding notification through the Newslines, comment in any mass media in form of an interview any decisions taken by the governing bodies of the Company which are subject to the disclosure in accordance with the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities” by way of communication of such notification, including a corporate event notice, through the Newslines, the Company not later than the following day shall be obliged to communicate through the Newslines a notification regarding a decision taken by the governing body independently from the maturity date determined by the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities” for the publication of such notification on the Newslines.

3.1.2 Communication of information on the Internet: www.e-disclosure.ru/portal/company.aspx?id=274 and www.tmk-group.ru

The Company shall publish corporate event notices and amendment notices the disclosure of which is mandatory for joint stock companies, quarterly and annual reports of the Company, annual and interim accounting (financial) statements of the Company, annual and interim consolidated financial statements of the Company, information regarding the contents of the articles of association and internal documents of the Company which govern the activity of their bodies, information regarding the affiliates of the Company, information on securities (additional) issues, information on a securities issue prospectus and other information on web pages provided by any Disseminator of information on the securities market and other financial instruments as well as on the Company’s official website (hereinafter referred to the “web pages”). The communication of such information shall be made on the following web pages: www.e-disclosure.ru/portal/company.aspx?id=274 and www.tmk-group.ru in accordance with the requirements of the laws of the Russian Federation and the regulatory acts of the Bank of Russia.

The publication of the information mandatory for disclosing by the Company on the web pages shall be made within the following terms:

- a) corporate event notices – not later than 2 days from the date of the occurrence of such event;
- b) amendment notices the disclosure of which is mandatory for the Company, except for notifications regarding the planned date of submission of applications making an entry in the USRLE related to the reorganization, termination of activity or liquidation of the Company, - not later than 2 days from the moment of the occurrence of such event; notifications regarding the planned date of submission of applications making an entry in the USRLE related to the reorganization, termination of activity or liquidation of the Company – not later than 3 working days from the date of delivery of an application for making such entry in the USRLE to an authorized governmental body by the Company;
- c) quarterly reports of the Company – not later than 45 days from the completion of the corresponding quarter;
- d) annual reports of the Company – not later than 2 days from the date of the execution of the minutes (expiry date determined by the laws of the Russian Federation for the execution of the minutes) of the meeting of the Board of Directors which took a decision regarding the approval of the annual report of the Company;
- e) annual accounting (financial) statements of the Company - not later than 3 days from the date of the execution of the audit report prepared by the audit firm in form of a report confirming their authenticity, but not later than 3 days from the expiry date determined by the laws of the Russian Federation for the mandatory provision of the copy of the annual (financial) statements of the Company;
- f) interim accounting (financial) statements of the Company - not later than 2 days from the date of their approval by the authorized body of the Company and if such body is a collegial body – not later than 2 days from the date of the execution of the minutes (expiry date determined by the laws of the Russian Federation for the execution of the minutes) of the meeting of the authorized collegial body; from the date of signing of the corresponding document of the Company if such document is not subject to approval by the authorized body of the Company;
- g) annual consolidated financial statements of the Company – not later than 3 days from the date of the execution of the audit report but not later than 120 days after the completion of the corresponding accounting year;
- h) interim consolidated financial statements of the Company for 6 months – not later than 3 days after the date of their execution but not later than 60 days from the date of the completion of the second quarter; for any other interim consolidated financial statements of the Company – not later than 2 days from the date of their

approval by the authorized body of the Company and if such body is a collegial body – not later than 2 days from the date of the execution of the minutes (expiry date determined by the laws of the Russian Federation for the execution of the minutes) of the meeting of the authorized collegial body; from the date of signing of the corresponding document of the Company if such document is not subject to approval by the authorized body of the Company;

- i) information regarding the contents of the articles of association – in case of amendments and (or) changes in the articles of association of the Company (adoption of the restated articles of association) not later than 2 days from the receipt of the documents from the authorized governmental body confirming the state registration of such amendments and (or) changes (state registration of the restated articles of association) by the Company, and in cases when provided by the federal law such amendments and (or) changes come into effect for third parties from the date of the notification of the authorized governmental body – not later than 2 days from the date of such notification;
- j) internal documents of the Company which govern the activity of their bodies - not later than 2 days from the date of the execution of the minutes (expiry date determined by the laws of the Russian Federation for the execution of the minutes) of the meeting of the General meeting of the shareholders (meeting of the Board of Directors) which took a decision in respect of the approval of such internal documents of the Company; in case of amendments and (or) changes into the internal documents which govern the activity of their bodies (adoption of new editions of the internal documents which govern the activity of their bodies) not later than 2 days from the date of the execution of the minutes (expiry date determined by the laws of the Russian Federation for the execution of the minutes) of the meeting of that authorized body of the Company which took a decision regarding the approval of such amendments and (or) changes (adoption of new editions of the internal documents which govern the activity of their bodies) of the said internal documents;
- k) information regarding the affiliates of the Company at the end of the accounting quarter – not earlier than the date of the completion of the accounting quarter and not later than 2 working days from the completion of the accounting quarter;
- l) information on securities (additional) issues; on a securities issue prospectus; information disclosed by issuers of mortgage bonds; information disclosed by issuers of Russian global depository receipts, disclosure of which is mandatory in accordance with the Russian Federation and the regulatory acts of the Bank of Russia and any other information that the Company is obliged to disclose in accordance with the laws of the Russian Federation and the regulatory acts of the Bank of Russia - in accordance with the laws of the Russian Federation and the regulatory acts of the Bank of Russia.

All the information that the Company is obliged to disclose in accordance with the regulatory acts of the Bank of Russia on the web pages shall become available within the terms determined by such regulatory acts.

3.1.3 Publication of information in the printed press

The Company publishes press releases, notifications, articles, interviews, advertising materials and other information in the periodical printed press distributed on the territory of the Russian Federation as well as abroad as and when such publication is required.

The communication of any other information may be done in the periodical printed press determined by the governing bodies of the Company.

3.1.4 Publication of information in brochures and booklets

The Company publishes information about the Company and its activity, advertising materials and other information in the brochures and booklets as and when such publication is required.

The Company manufactures printed annual reports. The manufacturing of the reports is carried out at the expense of the Company.

3.1.5 Press conferences and meetings with the shareholders and other interested persons

The Company on a regular basis organizes press conferences, presentations, road shows and meetings dedicated to most important events, which take place or will take place in the Company.

The Company on a regular basis holds meetings with its shareholders (representatives of the shareholders), investors, investor analytics and other interested persons. The Company on a regular basis participates in the Russian and international conferences and symposiums.

The representatives of the Company, which participate in press conferences, meetings, conferences and symposiums, are determined by the General Director.

3.1.6 Publication of information at the Unified Federal data register

The information, subject to communication at the Unified Federal data register (hereinafter referred to as the “UFDR”) in accordance with the laws of the Russian Federation concerning the state registration of legal entities, is subject to disclosing by the Company within 3 working days from the date of the occurrence of such event; information regarding the appraisal report – within 10 working days from the date of the acceptance of the appraisal report and shall be published on the official website of the UFDR: www.fedresurs.ru .

4. Forms of information disclosure

4.1 Disclosure of information in form of a securities issue prospectus and other information regarding the securities of the Company

In a securities issue prospectus the Company shall disclose the information in the order and scope provided by the regulatory legal acts of the Russian Federation. Additionally

the Company shall disclose all the material information which may impact the appraisal of the Company by the shareholders and other interested persons.

Information on securities (additional) issues; on a securities issue prospectus; information on the securities of the Company the disclosure of which is mandatory for the Company shall be disclosed in the order and form determined by the laws of the Russian Federation including the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities”.

4.2 Information disclosure in form of a corporate event notice

The Company shall disclose the information in form of a corporate event notice, the list of which is determined by the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities”.

4.3 Information disclosure in form of an amendment notice the disclosure of which is mandatory for joint stock companies

The information disclosure in form of an amendment notice the disclosure of which is mandatory for joint stock companies, shall be implemented in accordance with the laws of the Russian Federation and the regulatory acts of the Bank of Russia.

4.4 Information disclosure in form of a statement concerning the access to the insider information which is contained in the documents of an insider

The Company shall disclose any insider information in accordance with the laws of the Russian Federation concerning the illegal usage of insider information, the regulatory acts of the Bank of Russia in the order and terms of the disclosure of the insider information and the Regulations on the insider information of the Company.

4.5 Information disclosure in form of a quarterly report of the Company

The information about the Company in the order and scope provided by the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities” shall be disclosed in a quarterly report. Additionally the Company shall disclose all material information that may impact the valuation of the Company by the shareholders and other interested persons.

The quarterly report shall be signed by the General Director, as well as the Chief Accountant of the Company, in that way confirming the authenticity of the information containing in the quarterly report.

4.6 Information disclosure in form of an annual report of the Company

An annual report of the Company is the source of information about the activity of the Company, as well as the final document, which allows the shareholders to evaluate the performance of the Company for the year.

The Annual report of the Company must contain information determined by the laws of the Russian Federation and the regulatory acts of the Bank of Russia, the requirements of foreign stock exchanges on which the securities of the Company are listed, as well as the report on compliance of the Company with the principles and recommendations of the Corporate governance code recommended by the Bank of Russia.

At the compilation of the Annual report the Company shall take into account the recommendations of the Bank of Russia on information disclosure in annual reports and shall aim to disclose such information taking into account the interests of all the interested persons in accordance with the best existing practices on information disclosure.

The Annual report of the Company shall be signed by the General Director and (or) other authorized persons of the Company. The General Director of the Company shall submit the Annual report of the Company with the report of the Audit commission or an audit report of the Company to the Board of Directors for approval.

4.7 Information disclosure in form of interim accounting (financial) statements of the Company, annual accounting (financial) statements of the Company, interim consolidated financial statements of the Company and annual consolidated financial statements of the Company

Information disclosure in form of interim accounting (financial) statements of the Company, annual accounting (financial) statements of the Company, interim consolidated financial statements of the Company and annual consolidated financial statements of the Company shall be implemented in accordance with the laws of the Russian Federation and the regulatory acts of the Bank of Russia, including the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities”.

The annual accounting (financial) statements of the Company shall consist of the balance sheet, income statement and annexes (schedules) to them and shall be subject to the mandatory audit. The annual accounting (financial) statements of the Company shall be disclosed together with the audit report, which shall reflect the opinion of an auditor in a due form on authenticity of such statements.

The obligation to disclose information in form of annual consolidated financial statements of the Company is spread over the annual consolidated financial statements of the Company with the attachment of an audit report in respect of such statements.

4.8 Disclosure of information regarding the contents of the articles of association and internal documents of the Company which govern the activity of their bodies

Information regarding the contents of the articles of association and internal documents of the Company which govern the activity of their bodies shall be implemented in accordance with the laws of the Russian Federation and the regulatory acts of the Bank of Russia, including the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities”.

4.9 Information regarding the affiliates of the Company

The Company shall disclose any information regarding its affiliates in form of a List of the affiliated entities compiled in the form approved by the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities”. The text of the List of the affiliates of the Company shall become available on the web pages within not less than 3 years from the date of its publication.

4.10 Information disclosure on the web pages: www.e-disclosure.ru/portal/company.aspx?id=274 and www.tmk-group.ru

On the web pages the Company shall disclose information which includes but is not limited to the following:

- a) The Articles of Association with all the amendments and (or) changes (the text of the amended and restated Articles of Association shall be available on the web pages from the date when the Company found out or must find out about its state registration; in case of the adoption of the restated Articles of Association, the text of the former version of the Articles of Association must be available on the web pages during not less than 3 months from the date of the publication of the restated Articles of Association);
- b) The internal documents of the Company which govern the activity of their bodies with all the amendments and (or) changes must be available on the web pages until the date of the termination of the obligation of the Company to disclose its information in form of a quarterly report and corporate event notices; in case of adoption of the restated internal documents of the Company the text of the previous version of the internal document must be available on the web pages during not less than 3 months from the date of the publication of the new edition of the corresponding internal document;
- c) The annual report of the Company (the text of the annual report must be available on the web pages during not less than 3 years from the expiry date determined by the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities” for its publication on the web pages, and if it is published on the web pages after such expire date – from the date of its publication on the web pages);
- d) The quarterly report of the Company (the text of the quarterly report must be available on the web pages during not less than 5 years from the expiry date determined by the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities” for its publication on the web pages, and if it is published on the web pages after such expire date – from the date of its publication on the web pages);
- e) The annual accounting (financial) statements of the Company (the text of the annual accounting (financial) statements of the Company together with the audit report must be available on the web pages during not less than 3 years from the expiry date

determined by the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities” for their publication on the web pages, and if they are published on the web pages after such expire date – from the date of their publication on the web pages);

- f) The annual consolidated financial statements of the Company (the text of the annual consolidated financial statements of the Company together with the audit report must be available on the web pages during not less than 3 years from the expiry date determined by the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities” for their publication on the web pages, and if they are published on the web pages after such expire date – from the date of their publication on the web pages);
- g) The interim consolidated financial statements of the Company (the text of the interim annual consolidated financial statements of the Company must be available on the web pages during not less than 1 year from the expiry date determined by the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities” for their publication on the web pages, and if they are published on the web pages after such expire date – from the date of their publication on the web pages);
- h) Corporate event notices (the text of a Corporate event notice must be available on the web pages during not less than 1 year from the expiry date determined by the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities” for its publication on the web pages, and if it is published on the web pages after such expire date – from the date of its publication on the web pages);
- i) Amendment notices, the disclosure of which is mandatory for joint stock companies (the text of an amendment notice the disclosure of which is mandatory for joint stock companies must be available on the web pages during not less than 12 months from the expiry date determined by the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities” for its publication on the web pages, and if it is published on the web pages after such expire date – from the date of its publication on the web pages);
- j) Information on securities (additional) issues and other information on the securities of the Company (in case in accordance with the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities” any notifications disclosed during the procedure of the issue of securities are subject to disclosure by way of their publishing on the web pages, the texts of such notifications must be available on the web pages during not less than 12 months from the expiry date determined by the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities” for their publication on the web pages, and if they are published on the web pages after such expire date – from the date of their publication on the web pages);

- k) a securities issue prospectus (the text of the registered prospectus must be available on the web pages from the expiry date determined by the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities” for its publication on the web pages, and if it is published on the web pages after such expiry date – from the date of its publication on the web pages and until the expiration of 5 years from the date of the publication on the web pages of the text of the registered report (a submitted notification to the registering authority) of the results of the (additional) issue of securities; the text of the registered (submitted to a stock exchange) prospectus for securities (bonds, issuer’s options, Russian global depository receipts) must be available on the web page from the expiry date determined by the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities” for its publication on the web pages, and if it is published on the web pages after such expiry date – from the date of its publication on the web pages and until to the cancellation of such securities in which respect the securities issue prospectus was registered (submitted to a stock exchange);

4.11 *For the purpose of the strengthening of the publicity and transparency the Company performs the disclosure of any other information on its official website at: www.tmk-group.ru*

On the Company’s official website the Company performs the disclosure of the information which includes but is not limited to:

- a) Change of the legal name of the Company;
- b) Increase (decrease) of the share capital of the Company;
- c) Acquisition of its own shares if it is not connected with the decrease of the share capital of the Company indication the source of funds used for the acquisition of those shares, the information about the number of acquired shares, price of acquisition as well as any other information explaining the reasons and purpose of such acquisition;
- d) The Regulations on the Committee for appointments and remuneration of the Board of Directors of the Company, the Regulations on the Strategic Development Committee of the Board of Directors of the Company, the Regulations on the Audit Committee of the Board of Directors of the Company, the Regulations on the Corporate Secretary of the Company, the Regulations on the Service of the Internal audit of the Company, the Regulations on the Audit commission of the Company, the Regulations on the dividend policy of the Company, the Policy of TMK Group with regard to the internal audit of the Company, the Policy on the appointment of an external auditor of the Group for revision of consolidated statements of the Company, the Regulations on the Information Policy of the Company, the Policy of the Company with regard to the data protection, the Regulations on the insider information of the Company, the List of the insider information of the Company, the Corporate governance code of the Company, the Code of Conduct of the Company,

the Policy of the Company with regard to anti-corruption procedures and any other internal documents;

- e) Information about the activity, history, mission, geographical presence, corporate governance, share capital structure of the Company;
- f) Information about the social responsibility, corporate values, industrial safety and occupational safety, special evaluation of the working conditions in the Company;
- g) Information about the environmental policy and environmental management of the Company;
- h) Financial and operating results of the Company including any comments from the management of the Company as well as the forecast for future periods;
- i) Consolidated financial statements of the Company for 3 (three) and 9 (nine) months;
- j) Production and management structure of the Company including the information about the members of the governing bodies of the Company;
- k) Press releases and other materials of the Company including declarations from the senior managers of the Company;
- l) Information for the shareholders and investors including the data on the share capital, the securities of the Company, its registrator, the auditor of the Company;
- m) Information for the General meetings of the shareholders of the Company as well as information with regard to the decisions taken by the General meetings of the shareholders and the Board of Directors of the Company;
- n) Main production, financial results and indexes characterizing the activity of the Company;
- o) Information about the different directions of the activity of the Company;
- p) Any other information.

4.12 Information disclosure in form of submission of the information to the UFDR

The information that is subject to the publication in accordance with the laws of the Russian Federation concerning the state registration of legal entities, including notifications regarding the reorganization, liquidation of the Company as well as any other information provided by the Federal Law “Concerning the State registration of legal entities and private entrepreneurs” shall be submitted to the UFDR in the order determined by the laws of the Russian Federation.

4.13 Provision of the information to Moscow Exchange and other stock exchanges

For the maintenance of the securities of the Company listed on Moscow Exchange, the Company shall be obliged in the matter and terms determined by the laws of the Russian Federation and Listing Rules of Moscow Exchange to submit the following documents and information to Moscow Exchange:

- a) Questionnaire form of issuer;
- b) Questionnaire form of security;
- c) Report containing information with regard to the compliance of the issuer with the corporate governance rules;
- d) Questionnaire forms of independent directors;
- e) And other documents (information) provided by the Listing Rules of Moscow Exchange.

For the maintenance of the securities of the Company in the Listed securities on other stock exchanges, the Company shall be obliged to provide documents and information to those stock exchanges in the order and terms determined by the laws of the Russian Federation, the regulatory acts of the Bank of Russia and the Listing Rules of those stock exchanges.

The Company shall be obliged to disclose any information provided (submitted) to the corresponding regulatory authority (organization) that regulates foreign securities market, to the foreign regulated market operator and (or) other organizations in accordance with the foreign legislation for the purposes of its disclosure by foreign investors. That information shall be disclosed by the Company in the order, terms and by means provided by the Regulations of the Bank of Russia “Concerning the disclosure of information by the issuers of registrable securities”.

5. Provision of information to shareholders and other interested persons

5.1 General information with regard to the intercommunication with shareholders and other interested persons

- 5.1.1 The Company shall grant access to the information that the Company is obliged to keep and provide to the shareholders and other interested persons in accordance with the laws of the Russian Federation and the regulatory legal acts of the Russian Federation.
- 5.1.2 Any executive officer of the Company responsible for granting access to or provision of such information shall be determined by the General Director of the Company.
- 5.1.3 The shareholders of the Company shall be entitled to get acquainted with the documents that the Company is obliged to grant access to in accordance with the laws and regulatory legal acts of the Russian Federation at the principal place of management of the General Director at: building 2A, 40, Pokrovka str, Moscow.

5.1.4 The Company shall provide documents for studying or their copies at the receipt of a corresponding request in a free written form addressed to the General Director or the Chairman of the Board of Directors of the Company. The first name and the surname (paternal name, if applied) of an applying shareholder (for legal entities – legal name and legal address), the number and the category of the shares held by such shareholder(s) and the name of the requested document must be mentioned in such request.

5.1.5 For providing of documents or their copies the executive officer of the Company authorized by the General Director of the Company in accordance with clause 5.1.2 of the present Regulations shall confirm the fact of holding of shares of the Company by the applying person on basis of the register of shareholders of the Company.

In case the shares are transferred to the nominal holder, the owner of shares must provide the Company with an extract from the depo account, which shall be considered as a sufficient confirmation of title to shares. In case a representative of a shareholder requests certain information, he/she should submit a power of attorney duly issued.

5.1.6 Copies of documents are provided for a fee that can not exceed the cost of their manufacturing. The information about the cost of manufacturing of the copies of the documents shall be disclosed on the Company's official website at: www.tmk-group.com.

5.1.7 The Company, at the request of a person having a right to participate in the General meeting of the Shareholders, shall provide him/her with the copies of all the materials subject to the provision to the shareholders (its representatives) during the preparation and organization of the General meeting of the shareholders, within 7 days from the receipt by the Company of a corresponding request (from the date, when such information (materials) subject to provision to the persons having right to participate in the General meeting, must become available to such persons, if that corresponding request is received by the Company prior the commencement of the above mentioned term), if a shorter term is not stipulated by the Articles of Association of the Company or the internal document of the Company governing the activity of the General meeting.

5.1.8 The List of information, documents and materials subject to the provision to the shareholders during the preparation of the General meeting of the shareholders, shall be approved by the decision of the Board of Directors with regard to the holding of the General meeting of the shareholders.

Such information (materials) subject to the provision to the persons having right to participate in annual General meetings of the shareholders, during the preparation of the General meeting shall include:

a) The Annual report of the Company;

- b) The Report of the Audit commission of the Company subsequent to the results of the revision of the annual report of the Company;
- c) The annual accounting (financial) statements including the audit report and the report of the Audit commission of the Company subsequent to the results of their revision;
- d) Information on a candidate (candidates) to the executive bodies of the Company, the Board of Directors, the Audit commission, the Accounts committee and the auditors of the Company;
- e) Drafts of amendments and changes made to the Articles of Association (or a draft of the restated Articles of Association), drafts of the internal documents of the Company, drafts of decisions of the General meeting of the shareholders provided by the article 32.1 of the Federal Law “On Joint stock companies”;
- f) Information with regard to any shareholders agreements concluded during the year prior the holding of the General meeting of the shareholders;
- g) Conclusions of the Board of Directors in respect of major transactions;
- h) Report on related party transactions entered into by the Company during the year;
- i) As well as any other information (materials) provided by the current laws and the regulatory acts of the Bank of Russia, the Articles of Association and the internal documents of the Company.

5.2 Order of interaction with shareholders and other interested persons

5.2.1 Within the frames of the interaction with the shareholders and other interested persons the Company shall take certain actions directed to the strengthening of the publicity and transparency of the Company including inter alia:

- a) Distribution of press releases on all materials events of the Company;
- b) Meetings and presentations for the shareholders, other interested persons and analytics;
- c) Road shows for other interested persons;
- d) Organization of a special web page for the shareholders and investors on which answers to typical questions of the shareholders and investors shall be published; regularly updated calendar of corporate events of the Company as well as any other useful information for the shareholders and investors;
- e) Other activities organized by the Company.

5.2.2 The Deputy of the General Director for Strategy and Development shall be responsible for the organization of the interaction with the investors, investment community and stock exchanges. The Corporate Secretary shall be an executive officer of the Company responsible for the compliance with the current laws, the Articles of Association and the internal documents ensuring the rights and legal interests of the shareholders by the Company. The Deputy General Director for Interaction with the governmental authorities and business community shall be responsible for the organization of the system of general interaction with any governmental authorities and non-governmental organizations.

The Company shall not be obliged to publish or disclose any analytical reports in respect of the Company to any third parties. The Company at its own discretion shall be entitled to provide analytical reports to the Board of Directors, the Management Board, the General Director and any other executive officers of the Company for acknowledgement.

5.2.3 *Provision of information to the central depository*

The list of information connected to the execution of rights on securities which is provided by the Company to the central depository as well as the order and terms of the provision of such information, requirements to the order of granting of access by the central depository to the information disclosed by the Company and connected to the title on securities determined by the Regulations of the Bank of Russia “Concerning the list of the information connected to the title to securities provided by the issuers to the Central depository, the order and the terms of such provision as well as the requirements to the order of granting of access to such information by the Central depository”.

5.3 *Interaction with mass media*

5.3.1 For the purpose of the strengthening of the transparency and publicity of the Company, it shall procure interaction with the representatives of the mass media by means certain actions including inter alia:

- a) Distribution of press releases on all material events of the Company;
- b) Organization of press conferences and meetings of the management of the Company with the representatives of the mass media;
- c) Preparation of official replies on informational requests of the representatives of the mass media addressed to the Company;
- d) Participation in conferences, seminars and other public events;
- e) Maintenance and regular update of the Company’s official website;

5.3.2 The Deputy General Director for Interaction with the governmental authorities and business community and the Deputy of the General Director for Strategy and Development shall be responsible for the interaction with the mass media in the Company.

5.4 Interaction with the governmental authorities

5.4.1 The Company interacts with the governmental authorities of the Russian Federation, the Eurasian Economic Union and the foreign states on issues related to its current and potential activity in the following directions:

- a) Preparation and provision of any reference, analytical and other materials about the activity of the Company and on issues in the interests of the Company on basis of any requests from the governmental authorities;
- b) Participation in the sessions, hearings and working meetings and other events organized by the governmental authorities or arranged with the participation of the governmental authorities on the sectorial and intersectorial issues, any business related issues in general;
- c) Participation in the activity of any expertise and public counsels, working groups and other counselling bodies, organized at the governmental authorities;
- d) Participation in any proceedings connected to the improvement of the legislation and the legal practice of the Russian Federation and the Eurasian Economic Union, provided by the current laws (independently or together with the sectorial organizations).

5.5 Interaction with sectorial organizations

5.5.1 On a regular basis the Company in its capacity as a member or independently interacts with the sectorial organizations on the sectorial and intersectorial issues, any business related issues in general.

5.5.2 The Company shall carry out such interaction being governed by the current legislation (including antimonopoly provisions and anti-corruption regulations), by the constitutive documents and the public declarations of the sectorial organizations.

6. Information disclosure by the authorized officers of the Company

6.1 Any member of the Board of Directors, any member of the Management Board, as well as the General Director of the Company shall be obliged to notify the Board of Directors in a written form on any conflict of interests with the Company's interests.

6.2 Any member of the Board of Directors, any member of the Management Board, as well as the General Director of the Company shall be obliged to:

- a) Notify the Company in due time on any affiliation and changes in the grounds for such affiliation;
- b) Notify the Board of Directors on holding of securities of the Company as well on the share of its participation in the share capital of the Company and/or its subsidiaries (related entities), his/her intention to enter into any transactions with the securities of the Company or its subsidiaries (related entities), as well as disclose to the Company any information about the completed transactions with such securities; notify the Board of Directors on any potential transactions which can be treated as interested party transaction; at the same time any member of the Board of Directors shall immediately disclose to the Board of Directors any fact of such interest and grounds for its appearance.
- c) Disclose to the Board of Directors any information about any other material obligations which may impact its performance as a member of the Board of Directors and notify the Board of Directors about any consequent changes in such obligations.

6.3 Any member of the Board of Directors, any member of the Management Board, as well as the General Director of the Company shall be obliged to notify the Company about:

- a) Any legal entities in which they independently hold voting shares;
- b) Legal entities in which they, their spouses, parents, children, full blooded brothers and sisters, adoptive parents and adopted children and (or) any controlled entities are the controlling persons or have the right to give mandatory instructions;
- c) Legal entities in the governing bodies of which they, their spouses, parents, children, full blooded brothers and sisters, adoptive parents and adopted children and (or) any controlled entities occupy any positions;
- d) Any transaction being entered to or any potential transaction in which they can be treated as interested persons;
- e) Intention on serving in any governing body of other organizations (except in the controlled and related entities of the Company) as well as on the fact of such election (appointment);
- f) Personal data which he/she is obliged to disclose in accordance with the laws of the Russian Federation and any changes in such data.

6.4 Due to the nomination of any candidate for the election to the Board of Directors/Management Board and any change and (or) addition of the earlier provided information the candidates to the member(s) of the Board of Directors and Management Board of the Company shall disclose their personal information in form of a Questionnaire form of a member of the Board of Directors/Management Board of the Company which is approved by the Company.

7. Limitations on information disclosure. Classified, business or commercial secret. Insider information

7.1 The Company shall take all the necessary measures to protect the confidential information which in accordance with the regulatory legal acts of the Russian Federation as well as the internal documents of the Company is treated as information with limited access.

7.2 The list of information treated as commercial or business secret, order of access to such information as well as the possibility of its usage shall be determined by the Board of Directors of the Company taking into account the adherence of the reasonable balance between the publicity of the Company and its intention not to cause any damage to the safety and interests of the Company.

7.3 The order of access to the insider information and the protection of its confidentiality, order and terms of the disclosure of the insider information shall be determined by the laws of the Russian Federation, the regulatory acts of the Bank of Russia and the Regulations on the Insider information of the Company.

8. Final provisions

8.1 The Regulations on the information policy shall be approved by the Board of Directors of the Company.

8.2 If as a result of any changes of any regulatory legal acts of the Russian Federation certain provisions of the present Regulations come into contradiction to such legal acts, such provisions shall not apply and until the date of the entry of corresponding changes into the present Regulations, the Company shall be governed exclusively by the provisions of the legal and regulatory acts of the Russian Federation.