

**PROPRIETARY LIST OF INSIDER INFORMATION OF PAO SOVCOMFLOT
AND THE PROCEDURE AND TIMING FOR DISCLOSURE THEREOF
(hereinafter referred to as the "List")**

1. The proprietary list of insider information of PAO Sovcomflot as an issuer includes the following information:

1.1. Information about convening and holding a general shareholders' meeting of PAO Sovcomflot and resolutions passed thereby;

1.2. Information about holding a meeting of the PAO Sovcomflot Board of Directors (Supervisory Board) and its agenda;

1.3. Information about the following decisions taken by the PAO Sovcomflot Board of Directors:

- on the election (re-election) of the Chairman of the PAO Sovcomflot Board of Directors, and in the absence thereof, on the member of the PAO Sovcomflot Board of Directors who shall perform the functions of its Chairman;
- on proposing that the general shareholders' meeting of PAO Sovcomflot set a specific date in the resolution to pay (declare) dividends as the dividend record date;
- on the placement of equity securities of PAO Sovcomflot in organised trading;
- on the determination of the placement price of PAO Sovcomflot shares in organised trading;
- on the determination of the repurchase price of PAO Sovcomflot shares;
- on the acquisition by PAO Sovcomflot of equity securities placed thereby in organised trading;
- on the formation of the executive body of PAO Sovcomflot and early termination (suspension) of its powers, including those of the management company or manager;
- on recommendations regarding the amount of dividends on PAO Sovcomflot shares and the procedure for payment thereof;
- on granting consent to or subsequent approval of transactions treated as major transactions and/or interested-party transactions under the laws of the Russian Federation;
- on approving the agenda of a general shareholders' meeting of PAO Sovcomflot and other decisions related to preparing for, convening and holding a general shareholders' meeting of PAO Sovcomflot;
- on submitting issues specified in Sub-clauses 2, 6 and 14 through 19, Clause 1, Article 48 of Federal Law No. 208-FZ "On Joint Stock Companies" dated 26 December 1995 (hereinafter referred to as the "Federal Law on Joint Stock Companies") and the issue regarding delegation of the powers of the sole executive body of PAO Sovcomflot to a management company or manager to a general shareholders' meeting of PAO Sovcomflot (on proposing that the general shareholders' meeting of PAO Sovcomflot pass resolutions on those issues);
- on recommendations regarding a voluntary offer, including a competing one, or a mandatory offer provided for by Chapter XI.1 of the Federal Law on Joint Stock Companies received by PAO Sovcomflot;

1.4. Information about the failure by the PAO Sovcomflot Board of Directors to make the following decisions:

- on convening an annual (regular) general shareholders' meeting of PAO Sovcomflot and other decisions related to preparing for, convening and holding an annual (regular) general shareholders' meeting of PAO Sovcomflot;
- on convening (holding), or refusing to convene (hold), an extraordinary general shareholders' meeting of PAO Sovcomflot as requested by the Auditing Commission (Comptroller), Auditor or shareholder(s) of PAO Sovcomflot holding at least 10 per cent of its voting shares;
- on the inclusion of, or refusal to include, submitted items in the agenda of a general shareholders' meeting of PAO Sovcomflot and the nominated persons in the list of candidates for election to the relevant body of PAO Sovcomflot as proposed by the shareholder(s) holding at least 2 per cent of the voting shares of PAO Sovcomflot;
- on forming the sole executive body of PAO Sovcomflot at two consecutive meetings of the PAO Sovcomflot Board of Directors or during two months after the date of termination or expiration of the powers of the previously formed sole executive body as provided for by Clause 6, Article 69 of the Federal Law on Joint Stock Companies;
- on early termination of the powers of the sole executive body of PAO Sovcomflot at two consecutive meetings of the PAO Sovcomflot Board of Directors in the case provided for by Clause 7, Article 69 of the Federal Law on Joint Stock Companies;
- on convening (holding) an extraordinary general shareholders' meeting of PAO Sovcomflot when the number of directors on the PAO Sovcomflot Board of Directors becomes less than the quorum required for holding a meeting of the PAO Sovcomflot Board of Directors;
- on forming a temporary sole executive body of PAO Sovcomflot and holding an extraordinary general shareholders' meeting of PAO Sovcomflot to decide on early termination of the powers of its sole executive body or management company (manager) and to form a new sole executive body of PAO Sovcomflot or to delegate the powers of its sole executive body to a management company (manager) if the PAO Sovcomflot Board of Directors resolves to suspend the powers of the sole executive body or those of the management company (manager);
- on recommendations regarding a voluntary offer, including a competing one, or a mandatory offer provided for by Chapter XI.1 of the Federal Law on Joint Stock Companies received by PAO Sovcomflot, which include an assessment of the proposed price for equity securities to be acquired and possible changes in their market value after the acquisition, evaluation of plans of the person who submitted a voluntary offer, including a competing one, or a mandatory offer to PAO Sovcomflot, including in respect of its employees;

1.5. Information about the emergence of an entity controlled by and material to PAO Sovcomflot and termination of grounds for control over such an entity;

1.6. Information about the emergence of a person controlling PAO Sovcomflot and termination of grounds for such control;

1.7. Information about a reorganisation or liquidation decision taken by an entity controlling PAO Sovcomflot or controlled by and material to PAO Sovcomflot or by a person that has provided security for PAO Sovcomflot bonds admitted to organised trading (for which an application for admission to organised trading has been made);

1.8. Information about the appearance of the signs of insolvency (bankruptcy) of PAO Sovcomflot, a person controlling it, an entity controlled by and material to PAO Sovcomflot or a person that has provided security for PAO Sovcomflot bonds admitted to organised trading (for which an application for admission to organised trading has been made), which are provided for by the legislation of the Russian Federation on insolvency (bankruptcy);

1.9. Information about the acceptance by an arbitration court of a bankruptcy petition in respect of PAO Sovcomflot, a person controlling it, an entity controlled by and material to PAO Sovcomflot or a person that has provided security for PAO Sovcomflot bonds admitted to organised trading (for which an application for admission to organised trading has been made) as well as about the adoption by the arbitration court of a decision to declare such persons bankrupt, initiate a bankruptcy procedure against such persons or terminate bankruptcy proceedings against them.

1.10. Information about the filing of a claim against PAO Sovcomflot, a person controlling it, an entity controlled by and material to PAO Sovcomflot or a person that has provided security for PAO Sovcomflot bonds admitted to organised trading (for which an application for admission to organised trading has been made) amounting to 10 or more per cent of the book value of their respective assets as of the end date of the last completed reporting period preceding the filing of the claim;

1.12. Information about the date as of which the persons entitled to exercise rights attached to PAO Sovcomflot securities admitted to organised trading (for which an application for admission to organised trading has been made) are determined, including the record date for a general shareholders' meeting of PAO Sovcomflot;

1.12. Information about the stages of the procedure for the issuance of PAO Sovcomflot securities admitted to organised trading (for which an application for admission to organised trading has been made);

1.13. Information about the suspension and resumption of the issuance of PAO Sovcomflot securities admitted to organised trading (for which an application for admission to organised trading has been made);

1.14. Information about the fact that an issue (additional issue) of PAO Sovcomflot securities admitted to organised trading (for which an application for admission to organised trading has been made) has been recognised as failed or invalid;

1.13. Information about the redemption of equity securities of PAO Sovcomflot admitted to organised trading (for which an application for admission to organised trading has been made);

1.16. Information about income accrued and/or paid on equity securities of PAO Sovcomflot admitted to organised trading (for which an application for admission to organised trading has been made), provided that the conditions are met;

1.20. Information about the conclusion of an agreement between PAO Sovcomflot and a Russian market maker for including equity securities of PAO Sovcomflot in the list of securities admitted to trading by the Russian market maker and an agreement between PAO Sovcomflot and a Russian stock exchange for including equity securities of PAO Sovcomflot in the quotation list of the Russian stock exchange;

1.18. Information about the inclusion of equity securities of PAO Sovcomflot in the list of securities admitted to organised trading by a Russian market maker or their removal from the said list and about the inclusion of equity securities of PAO Sovcomflot in the quotation list of a Russian exchange or their removal therefrom;

1.22. Information about the inclusion of equity securities of PAO Sovcomflot or securities of a foreign issuer certifying the rights to equity securities of PAO Sovcomflot in the list of securities admitted to trading in a foreign organised (regulated) financial market and the removal of such securities from the said list, as well as about the inclusion of such securities in the quotation list of a foreign stock exchange or their removal therefrom;

1.20. Information about the conclusion by PAO Sovcomflot of a price maintenance (stabilization) agreement in respect of equity securities of PAO Sovcomflot (securities of a foreign issuer certifying the rights to equity securities of PAO Sovcomflot) admitted to organised trading (for

which an application for admission to organised trading has been made) and termination of such agreement;

1.21. Information about the submission by PAO Sovcomflot of an application for obtaining the Bank of Russia's permission to place and/or organise circulation of its equity securities outside the Russian Federation and about the obtaining of such permission;

1.22. Information about the failure by PAO Sovcomflot to fulfil its obligations to holders of its equity securities admitted to organised trading;

1.23. Information about the acquisition by a person or termination of the person's right to dispose, directly or indirectly (through persons controlled thereby), independently or jointly with other persons affiliated therewith through a trust management agreement and/or an ordinary partnership agreement and/or an agency agreement and/or a shareholder agreement and/or any other agreement the subject of which is the exercise of rights certified by PAO Sovcomflot shares, of a certain number of votes attached to the voting shares comprising the authorised capital of PAO Sovcomflot, if such number of votes constitutes 5 per cent or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 per cent of the total number of votes attached to the voting shares comprising the authorised capital of PAO Sovcomflot;

1.24. Information about a voluntary offer, including a competing one, or a mandatory offer to acquire equity securities of PAO Sovcomflot admitted to organised trading (for which an application for admission to organised trading has been made) received by Sovcomflot according to Chapter XI.1 of the Federal Law on Joint Stock Companies and about changes made to such offers;

1.25. Information about a notice of the right to demand that equity securities of PAO Sovcomflot admitted to organised trading (for which an application for admission to organised trading has been made) be repurchased or a demand to repurchase equity securities of PAO Sovcomflot admitted to organised trading (for which an application for admission to organised trading has been made) received by Sovcomflot according to Chapter XI.1 of the Federal Law on Joint Stock Companies;

1.26. Information about discovery of errors in previously disclosed or submitted accounting (financial) statements of PAO Sovcomflot;

1.27. Information about a transaction made by PAO Sovcomflot or a person that has provided security for PAO Sovcomflot bonds admitted to organised trading (for which an application for admission to organised trading has been made) which is worth 10 or more per cent of the book value of assets of PAO Sovcomflot or such person as of the end date of the last reporting period preceding the transaction, for which the deadline for submitting accounting (financial) statements has expired (the last completed reporting period preceding the transaction).

1.28. Information about a transaction treated as a major transaction under the laws of the Russian Federation made by an entity controlling PAO Sovcomflot or controlled by and material to PAO Sovcomflot;

1.29. Information about an interested-party transaction made PAO Sovcomflot, where the value of such transaction:

exceeds RUB 500 million or amounts to two or more per cent of the book value of the issuer's assets as of the end date of the last completed reporting period preceding the decision to consent to the transaction made by the issuer's authorised management body, if the book value of assets as of that date does not exceed RUB 100 billion, or, where a decision to consent to the transaction was not made, as of the end date of the last completed reporting period preceding the transaction;

- amounts to one or more per cent of the book value of the issuer's assets as of the end date of the last completed reporting period preceding the decision to consent to the transaction made by the issuer's authorised management body, if the book value of assets as of that date exceeds RUB 100

billion, or, where a decision to consent to the transaction was not made, as of the end date of the last completed reporting period preceding the transaction;

1.30. Information about a change in the structure and/or amount of security for secured bonds of PAO Sovcomflot admitted to organised trading (for which an application for admission to organised trading has been made);

1.31. Information about a change in the asset value of a person that has provided security for PAO Sovcomflot bonds admitted to organised trading (for which an application for admission to organised trading has been made) amounting to 10 or more per cent of the book value of assets of such person;

1.32. Information about the acquisition by PAO Sovcomflot or termination of the right of PAO Sovcomflot to dispose, directly or indirectly (through persons controlled thereby), independently or together with other persons affiliated with PAO Sovcomflot through a trust management agreement and/or an ordinary partnership agreement and/or an agency agreement and/or a shareholder agreement and/or any other agreement the subject of which is the exercise of rights certified by shares (stakes) in an entity whose equity securities are admitted to organised trading, of a certain number of votes attached to the voting shares (stakes) comprising the authorised capital of such entity, if such number of votes constitutes 5 per cent or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 per cent of the total number of votes attached to the voting shares (stakes) comprising the authorised capital of such entity;

1.33. Information about the conclusion by PAO Sovcomflot, a person controlling PAO Sovcomflot or an entity controlled by PAO Sovcomflot of an agreement providing for an obligation to purchase equity securities of PAO Sovcomflot admitted to organised trading (for which an application for admission to organised trading has been made);

1.40. Information about a change in the size of an equity stake in PAO Sovcomflot and/or entities controlled by and material to PAO held by the following persons:

- members of the Board of Directors or the collegiate executive body of PAO Sovcomflot and the person who holds the position (performs the functions) of the sole executive body of PAO Sovcomflot;

- members of the board of directors (supervisory board) or the collegiate executive body of a management company and the person who holds the position (performs the functions) of the sole executive body of a management company, if the powers of the sole executive body of PAO Sovcomflot have been delegated to the management company;

1.35. Information about the creation and/or termination of the right of holders of PAO Sovcomflot bonds admitted to organised trading (for which an application for admission to organised trading has been made) to demand that such bonds be redeemed early;

1.36. Information about a dispute related to the establishment, management of or participation in PAO Sovcomflot:

- about the receipt of a notice of intention to file a claim (statement of claim) to an arbitration court;

- about the initiation of proceedings in the case and admission of the claim (statement of claim) by the arbitration court;

- about a change in the cause of action filed previously;

- about the application of injunctive measures;

- about the abandonment of the claim;

- about the acknowledgement of the claim;

- about the conclusion of a settlement agreement;
- about the adoption of a ruling ending the proceedings in the case in the arbitration court of the first instance;

1.37. Information about the presentation of claims related to the fulfilment of obligations in respect of PAO Sovcomflot bonds admitted to organised trading (for which an application for admission to organised trading has been made);

1.45. Information about the placement outside the Russian Federation of bonds or other financial instruments certifying loan obligations discharged at the expense of PAO Sovcomflot;

1.39. Information about the acquisition (disposal) by PAO Sovcomflot and/or entities under its control of voting shares of PAO Sovcomflot or securities of a foreign issuer certifying the rights to voting shares of PAO Sovcomflot, excluding entities controlled by PAO Sovcomflot that are brokers and/or trustees and have made the transaction in their own name but at the expense of a client other than PAO Sovcomflot and/or an entity under its control;

1.40. Information to be sent or submitted by PAO Sovcomflot to a relevant authority (organisation) of a foreign state, to a foreign exchange and/ or other organisations under a foreign law for the purpose of its disclosure or provision to foreign investors in connection with placement or circulation of PAO Sovcomflot securities outside the Russian Federation, including through purchase of securities of a foreign entity being placed (placed) under a foreign law;

1.41. Information about the holding and agenda of a general meeting of holders of PAO Sovcomflot securities admitted to organised trading (for which an application for admission to organised trading has been made) and decisions taken by a general meeting of holders of such bonds;

1.42. Information about the designation by PAO Sovcomflot of a new representative of holders of PAO Sovcomflot securities admitted to organised trading (for which an application for admission to organised trading has been made);

1.43. Information about the adoption by the authorised management body of PAO Sovcomflot of a decision to cancel the placement of equity securities of PAO Sovcomflot admitted to organised trading (for which an application for admission to organised trading has been made);

1.44. Information comprising the annual consolidated financial statements of PAO Sovcomflot and interim consolidated financial statements of PAO Sovcomflot for a reporting period consisting of three, six or nine months of the reporting year and that contained in the auditor's reports thereon or other document prepared following a review of the interim consolidated financial statements in accordance with the standards on auditing;

1.45. Information contained in annual reports of PAO Sovcomflot, except for information already disclosed;

1.46. Information comprising annual accounting (financial) statements of PAO Sovcomflot and that contained in auditor's reports thereon;

1.45. Information contained in quarterly reports of PAO Sovcomflot, except for information already disclosed;

1.48. Information comprising interim accounting (financial) statements of PAO Sovcomflot for a reporting period consisting of three, six or nine months of the reporting year and that contained in the auditor's reports thereon, if those statements were audited;

1.49. Information contained in a report (notice) on the results of an issue (additional issue) of equity securities of PAO Sovcomflot admitted to organised trading (for which an application for admission to organised trading has been made), except for information already disclosed;

1.50. Information contained in the prospectus of PAO Sovcomflot securities to be placed in organised trading according to a decision of the issuer's board of directors (supervisory board), except for information already disclosed;

1.51. Information about the conclusion by PAO Sovcomflot of a strategic partnership agreement or another agreement not indicated in lines 1.17, 1.20, 1.23, 1.27 through 1.29 of this List, if the conclusion of such agreement may significantly affect the price of equity securities of PAO Sovcomflot admitted to organised trading (for which an application for admission to organised trading has been made);

1.52. Information about enforcement actions (including attachment) taken by a court, an arbitration court, the Federal Bailiff Service against funds or other property belonging to PAO Sovcomflot, an entity controlling PAO Sovcomflot or controlled by and material to PAO Sovcomflot or a person that has provided security for PAO Sovcomflot bonds other than the Russian Federation that has provided a government guarantee of the Russian Federation, a constituent entity of the Russian Federation that has provided a government guarantee of the constituent entity of the Russian Federation or a municipal entity that has provided a municipal guarantee for PAO Sovcomflot bonds admitted to organised trading (for which an application for admission to organised trading has been made) that constitute 10 or more per cent of the book value of their respective assets as of the end date of the last completed reporting period preceding the enforcement actions;

1.53. Information about the acquisition by a person or termination of the person's right to dispose, directly or indirectly (through persons controlled thereby), independently or jointly with other persons affiliated therewith through a trust management agreement and/or an ordinary partnership agreement and/or an agency agreement and/or a shareholder agreement and/or any other agreement the subject of which is the exercise of rights certified by shares (stakes) in an entity that has provided a suretyship, guarantee or collateral for PAO Sovcomflot bonds admitted to organised trading (for which an application for admission to organised trading has been made), if such person is not the Russian Federation that has provided a government guarantee of the Russian Federation, a constituent entity of the Russian Federation that has provided a government guarantee of the constituent entity of the Russian Federation or a municipal entity that has provided a municipal guarantee for PAO Sovcomflot bonds admitted to organised trading (for which an application for admission to organised trading has been made), of a certain number of votes attached to the voting shares (stakes) comprising the authorised capital of that entity, if such number of votes constitutes 5 per cent or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 per cent of the total number of votes attached to the voting shares (stakes) comprising the authorised capital thereof.

1.54. Information about the initiation of criminal proceedings (information received by PAO Sovcomflot from preliminary investigation or inquiry agencies) against a member of the PAO Sovcomflot Board of Directors, the sole executive body of PAO Sovcomflot, an entity controlling PAO Sovcomflot, an entity controlled by and material to PAO Sovcomflot or a person that has provided security for PAO Sovcomflot bonds admitted to organised trading (for which an application for admission to organised trading has been made);

1.55. Information about a decision on PAO Sovcomflot's participation in other commercial organisations taken by the PAO Sovcomflot Board of Directors.

2. PAO Sovcomflot shall disclose information specified in items 1.1 through 1.54 of this List according to the procedure and within the time limits established (or determined in the manner prescribed) by the Bank of Russia regulations in effect on the relevant date.

Information specified in item 1.55 of this List shall be disclosed within the following deadlines after the date of preparation of the minutes (the expiration of the period established by legislation of the Russian Federation for preparing the minutes) of the meeting of the PAO Sovcomflot Board

of Director at which the relevant decision was passed in the form of a notice of material fact "On certain decisions made by the Issuer's Board of Directors":

- in the newswire - within 1 (one) business day;
- on a web page - within 2 (two) business days.