

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, declaring a general shareholders’ meeting of PAO Sovcomflot failed, and resolutions passed by a general shareholders’ meeting of PAO Sovcomflot or by a person holding all the PAO Sovcomflot voting shares.

1.2. Information about holding a meeting of the PAO Sovcomflot Board of Directors and its agenda as well as about individual resolutions passed by the PAO Sovcomflot Board of Directors:

1.2.1. on proposing that the PAO Sovcomflot general shareholders’ meeting set a specific date in the resolution to pay (declare) dividends as the dividend record date;

1.2.2. on the placement or disposition of the PAO Sovcomflot equity securities;

1.2.3. on the determination of or a procedure for the determination of the placement price for the PAO Sovcomflot shares or the PAO Sovcomflot securities convertible to shares;

1.2.4. on the formation of the PAO Sovcomflot executive body and early termination (suspension) of its powers, including those of a management company or a manager;

1.2.5. on the inclusion of candidates in the list of candidates for voting at the annual general shareholders’ meeting of PAO Sovcomflot on the issue of electing members of the PAO Sovcomflot Board of Directors;

1.2.6. on recommendations regarding the amount of dividend on the PAO Sovcomflot shares and a procedure for payment thereof;

1.2.7. on the approval of the PAO Sovcomflot internal documents;

1.2.8. on granting consent to or subsequent approval of a transaction (several related transactions) of PAO Sovcomflot treated under the laws of the Russian Federation as a major transaction and/or an interested party transaction as well as any other transaction (several related transactions), the value of which is 10 or more percent of the book value of the PAO Sovcomflot assets according to the PAO Sovcomflot’s accounting (financial) statements as of the last reporting date (the end date of the last completed reporting period determined in accordance with Sub-Clause 26, Clause 1, Article 2 of Federal Law “On the Securities Market” (The Collection of Legislative Acts of the Russian Federation, 1996, No. 17, Art. 1918; 2020, No. 31, Art. 5065), preceding the date of the decision to give consent to make the transaction or the transaction date, if a decision on its subsequent approval is made);

1.2.9. on the delegation of authorities of the PAO Sovcomflot sole executive body to a management company or a manager, on the approval of a management company or a manager, and terms and conditions of the agreement entered into by PAO Sovcomflot and the management company or the manager;

1.2.10. on the approval of a registrar that maintains the PAO Sovcomflot securities register, terms and conditions of the agreement therewith as regards maintaining the PAO Sovcomflot securities register, and termination of the agreement therewith.

1.3. Information about passing the resolution on reorganisation or liquidation of the entity that has provided security for the PAO Sovcomflot bonds.

1.4. Information about the appearance of the indications of bankruptcy of PAO Sovcomflot or of an entity that has provided security for the PAO Sovcomflot bonds, as provided for by Federal Law dated October 26, 2002 No. 127-FZ "On the Insolvency (Bankruptcy)" (The Collection of Legislative Acts of the Russian Federation, 2002, No. 43, Art. 4190; 2021, No. 27, Art. 5181).

1.5. Information about the acceptance of a bankruptcy petition in respect of PAO Sovcomflot by an arbitration court and about the ruling issued by the arbitration court to declare PAO Sovcomflot insolvent (bankrupt), about the introduction of one of the bankruptcy procedures in respect of PAO Sovcomflot, the termination of bankruptcy proceedings in respect of PAO Sovcomflot.

1.6. Information about the date as of which the persons entitled to exercise rights attached to the PAO Sovcomflot securities are determined (recorded).

1.7. Information about the stages of the PAO Sovcomflot securities issuance procedure.

1.8. Information about the suspension and resumption of the issuance of PAO Sovcomflot securities.

1.9. Information about the fact that the bond programme has been recognised as failed, that the issue (additional issue) of the PAO Sovcomflot securities has been recognised as failed or invalid.

1.10. Information about the PAO Sovcomflot securities redemption.

1.11. Information about the registration of changes in the decision to issue securities as regards the change in the scope of rights attaching to the securities and/or nominal value of the securities, including consolidation or split-up thereof.

1.12. Information about the resolution passed by PAO Sovcomflot to purchase (emergence of the grounds to purchase) the securities that it placed.

1.13. Information about income accrued (declared) and/or paid on the PAO Sovcomflot equity securities, about other payments due to the holders of the PAO Sovcomflot securities as well as about the intention to fulfil the obligation to make payments on the PAO Sovcomflot bonds, the rights to which are recorded in the PAO Sovcomflot securities register.

1.14. Information about the inclusion of the PAO Sovcomflot equity securities by the Russian market operator in the list of securities admitted to organised trading for signing sale and purchase agreements, inter alia, about the inclusion of the PAO Sovcomflot equity securities in the quotation list by the Russian stock exchange, or the removal of the PAO Sovcomflot securities by the Russian market operator from the list of securities admitted to organised trading for signing sale and purchase agreements, inter alia, about the removal of the PAO Sovcomflot securities from the quotation list by the Russian stock exchange as well as about the transfer of the PAO Sovcomflot securities from one quotation list to another (about the removal of the PAO Sovcomflot securities from one quotation list and the inclusion thereof in another quotation list).

1.15. Information about the inclusion of the PAO Sovcomflot equity securities (securities of a foreign issuer certifying rights to the PAO Sovcomflot equity securities (hereinafter referred to as 'the depositary securities') in the list of securities admitted to trading in a foreign organised (regulated) financial market, inter alia, about the inclusion of these securities by the foreign exchange in the quotation list and about the removal of the PAO Sovcomflot securities (the depositary securities) from the list of securities admitted to trading in the foreign organised

(regulated) financial market, inter alia, about the removal of these securities from the quotation list by the foreign exchange.

1.16. Information about the fact that PAO Sovcomflot failed to fulfil its obligations to the holders of its equity securities.

1.17. Information about the acquisition by a person or termination of a person's right to dispose, directly or indirectly (through controlled persons), 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 PAO Sovcomflot authorised capital, 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 PAO Sovcomflot authorised capital.

1.18. Information about a voluntary offer, including a competing one, or a mandatory offer to acquire the PAO Sovcomflot equity securities and about changes made to such offers received by PAO Sovcomflot according to Chapter XI.1 of the Federal Law "On Joint Stock Companies" No. 208-FZ dated December 26, 1995 (The Collection of Legislative Acts of the Russian Federation, 1996, No. 1, Art. 1; 2006, No. 2, Art. 172; 2016, No. 27, Art. 4276) (hereinafter referred to as 'the Federal Law "On Joint Stock Companies"').

1.19. Information about a notice of the right to demand that the PAO Sovcomflot equity securities be repurchased or a demand to repurchase the PAO Sovcomflot equity securities received by PAO Sovcomflot according to Chapter XI.1 of the Federal Law "On Joint Stock Companies."

1.20. Information about the discovery of errors in previously disclosed accounting (financial) statements, consolidated financial statements of PAO Sovcomflot.

1.21. Information about a transaction made by PAO Sovcomflot or an organisation controlled by and material to PAO Sovcomflot, as defined in Clause 1.14 of the Regulation of the Bank of Russia No. 714-P (hereinafter referred to as 'the organisation controlled by and material to PAO Sovcomflot'), which is worth 10 or more per cent of the book value of the assets of PAO Sovcomflot or of the organisation controlled by and material to PAO Sovcomflot, according to the accounting (financial) statements of PAO Sovcomflot or of this organisation as of the last reporting date (the end date of the last completed reporting period preceding the transaction).

1.22. Information about a transaction made by PAO Sovcomflot or an organisation controlled by and material to PAO Sovcomflot, which is an interested party transaction and conforms to the indications specified in Clause 35.1 of the Regulation of the Bank of Russia No. 714-P.

1.23. Information about a change in the structure and/or amount of security for the PAO Sovcomflot secured bonds.

1.24. Information about the acquisition by PAO Sovcomflot or termination of PAO Sovcomflot's right to dispose, directly or indirectly (through controlled persons), 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 organisation, 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 organisation, 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 organisation.

- 1.25. Information about the conclusion by an entity controlling PAO Sovcomflot or an organisation controlled by PAO Sovcomflot of an agreement envisaging an obligation to purchase the PAO Sovcomflot equity securities.
- 1.26. Information about the creation and/or termination of the right of the holders of the PAO Sovcomflot bonds to demand that such bonds be redeemed early.
- 1.27. Information about assigning the rating to securities and/or PAO Sovcomflot as well as about the change in the rating made by a credit rating agency or other organisation based on the agreement signed with PAO Sovcomflot.
- 1.28. Information about the commencement of court proceedings in respect of the dispute relating to the establishment, management of or participation in PAO Sovcomflot (hereinafter referred to as ‘the Corporate Dispute’) or any other dispute, a claimant or a defendant in which is PAO Sovcomflot and the amount of claims under which is 10 or more percent of the book value of the assets determined based on the PAO Sovcomflot accounting (financial) statements as of the last reporting date (the end date of the last completed reporting period preceding the date on which the court accepted a claim to initiate the proceedings) (hereinafter referred to as ‘the material dispute’), as well as about the receipt of a court ruling which ends the definitive hearing of the case of a corporate dispute or a material dispute, except for the information indicated in Clause 41.6 of the Regulation of the Bank of Russia No. 714-P.
- 1.29. Information about the placement outside the Russian Federation of bonds or other financial instruments certifying loan obligations discharged at the PAO Sovcomflot expense.
- 1.30. Information about the resolution of the Bank of Russia to relieve PAO Sovcomflot from the obligation to disclose information in accordance with Article 30 of Federal Law “On the Securities Market” (The Collection of Legislative Acts of the Russian Federation, 1996, No. 17, Art. 1918; 2018, No. 53, Art. 8440).
- 1.31. Information about the acquisition (disposal) of the PAO Sovcomflot voting shares or depositary securities certifying rights to the PAO Sovcomflot voting shares, PAO Sovcomflot or an organisation controlled by PAO Sovcomflot, excluding cases of purchasing the PAO Sovcomflot voting shares (depositary securities certifying rights to the PAO Sovcomflot voting shares) in the process of placement of the PAO Sovcomflot voting shares and/or acquisition (disposal) of the PAO Sovcomflot voting shares (depositary securities certifying rights to the PAO Sovcomflot voting shares) by a broker and/or trustee, acting in their own name but at the client’s expense to fulfil the client’s instruction.
- 1.32. Information about the holding and agenda of a general meeting of holders of the PAO Sovcomflot bonds, about resolutions passed by a general meeting of holders of the PAO Sovcomflot bonds as well as about declaring a general meeting of holders of the PAO Sovcomflot bonds failed.
- 1.33. Information about the designation by PAO Sovcomflot of a representative of holders of the bonds after the registration of the issue of the bonds.
- 1.34. Information about the date that the representative of the holders of the bonds shall exercise his/her powers from.
- 1.35. Information about the conclusion by PAO Sovcomflot of a novation agreement or an accord and satisfaction agreement which incurs the termination of obligations in respect of the PAO Sovcomflot bonds.
- 1.36. Information about the emergence of the right of the holders of the convertible PAO Sovcomflot securities to demand from PAO Sovcomflot the conversion of the convertible PAO Sovcomflot securities that they hold.

1.37. Information comprising PAO Sovcomflot's annual consolidated financial statements, PAO Sovcomflot's interim consolidated financial statements for a reporting period consisting of 3, 6 or 9 months of a reporting year and the information contained in auditor's reports thereon or in any document made based on the audit results of the interim consolidated financial statements in accordance with the audit standards.

1.38. Information contained in PAO Sovcomflot's annual reports, except for information already disclosed.

1.39. Information comprising the PAO Sovcomflot interim accounting (financial) statements for a reporting period consisting of 3, 6 or 9 months of a reporting year together with the information contained in the auditor's reports thereon, if audited, as well as other information comprising the PAO Sovcomflot annual accounting (financial) statements together with the auditor's report thereon, if audited.

1.40. Information contained in reports of issuers of equity securities made for reporting periods consisting of 6 months and 12 months, except for information already disclosed.

1.41. Information contained in the PAO Sovcomflot prospectus of securities, except for information already disclosed.

1.42. Information comprising the terms of placement of securities defined by PAO Sovcomflot in a separate document, except for earlier disclosed information (in case no prospectus of securities is available or the terms of placement of securities are not available in the prospectus).

1.43. Information about the conclusion by PAO Sovcomflot of a strategic partnership agreement or any other agreement (transaction), except for agreements (transactions) indicated in lines 1.21, 1.22, 1.27 hereof, if the conclusion of such agreement (transaction) may significantly affect the price of the PAO Sovcomflot equity securities admitted to organised trading (for which an application for admission to organised trading has been made).

1.44. 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 organisation controlling PAO Sovcomflot or controlled by and material to PAO Sovcomflot or a person that has provided security for the 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.

1.45. Information about the acquisition by a person or termination of the person's right to dispose, directly or indirectly (through controlled persons), 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 organisation that has provided a suretyship, guarantee or collateral for the 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, of a certain number of votes attached to the voting shares (stakes) comprising its authorised capital, 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.

1.46. 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 management bodies, an organisation controlling PAO Sovcomflot, an organisation controlled by and material to PAO Sovcomflot or a person that has provided security for the PAO Sovcomflot bonds admitted to organised trading (for which an application for admission to organised trading has been made).

1.47. Information contained in the materials based on which the PAO Sovcomflot management bodies, except for the general shareholders' meeting, pass resolutions that may have a substantial impact on the price of the PAO Sovcomflot securities admitted to organised trading (for which an application for admission to organised trading has been made), except for information disclosed earlier.

1.48. Information about other events (actions) that have, in the opinion of PAO Sovcomflot, a significant impact on the price or quotations of its securities.

1.49. Information about a decision made by the PAO Sovcomflot Board of Directors to participate in other commercial organisations.

2. PAO Sovcomflot shall disclose information specified in lines 1.1 through 1.48 hereof 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 line 1.49 hereof shall be disclosed within the following deadlines after the date of preparation of the minutes (the expiration date 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 resolution 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 the PAO Sovcomflot's web page – within 2 (two) business days.