

PROCEDURE
on Dealing with the Insider Information and Insiders
of International Investment Bank

Budapest
2020

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1. GENERAL PROVISIONS

1.1. Scope and basic provisions

1.1.2. Procedure for the management of insider information and insiders of International Investment Bank (hereinafter – the Procedure) establishes the main requirements for handling of insider information and insiders of International Investment Bank.

1.1.3. The Procedure has been developed based on the general requirements of Regulation No. 596/2014 of the European Parliament and of the Council on market abuse and national legislations of IIB member states on countering unlawful use of insider information and market manipulation, as well as the requirements of the Code of Conduct of International Investment Bank [1] and the Code of Ethics of the Board of Directors of International Investment Bank [2].

1.1.4. The goal of the Procedure is to assist in forming an effective, transparent, and competitive financial market through implementation of internal control measures by the Bank in order to prevent, identify, and combat abuse in the form of unlawful use and dissemination of insider information, manipulation of prices for financial instruments issued by the Bank as well as financial instruments of third parties.

1.1.5. The requirements of the Procedure apply to all employees of the Bank, the employees of its subsidiaries and other persons classified as Insiders according to this Procedure.

1.1.6 The text of this document is published on the existing information resources intended for use by members of the Board of Governors, the Board of Directors, the Audit Committee and delegations of the Bank member states.

1.1.7. The division initiating this document is the Compliance Department.

1.1.8. The division responsible for keeping this document up to date is the Compliance Department.

1.1.9. The list of the Bank regulations becoming void after adoption of this Procedure is provided in Section 16.

1.2. Terms and definitions

Below is the list of terms and definitions used in this Procedure:

Term	Definition
Insider Information	Accurate and specific information that was not disseminated, dissemination of which may have a significant influence on prices of Financial Instruments issued by the Bank listed as IIB insider information
Insider	A person having access to Insider Information
Publicly Available Information	Publicly available data and other information access to which is not restricted
List of Insider Information	Categories of information classified as the Bank insider information
Unlawful dissemination of Insider Information	Dissemination of Insider Information in violation of the requirements of this Procedure
Audit Committee	A collective body consisting of representatives of IIB member states auditing activities of the Bank
Secretary	The Bank employee responsible for organization of work of the collective body (committee) in accordance with the procedure established by existing Bank regulations

Board of Governors	The supreme collective governing body of IIB
Board of Directors	A collective management body of the Bank, performing general management and supervision of the Bank activities and reporting to the Board of Governors.
Financial Instrument of the Bank	A security or derivative financial instrument issued by the Bank

1.3. Abbreviations

The following abbreviations are used in this document:

Abbreviation	Meaning
BA	Board Administration
Bank, IIB	International Investment Bank
CD	Compliance Department
HRD	Human Resources Department
SDFD	Structured and Debt Finance Department
FD	Finance Department
LD	Legal Department

2. INSIDER INFORMATION OF THE BANK

2.1. The CD shall work out and draw up the List of Insider Information which shall be approved by the Bank Order.

2.2. IIB Insider Information shall not include:

2.2.1. information that became accessible for the general public, *inter alia*, as a result of its dissemination;

2.2.2. research, forecasts and appraisals performed on the basis of the Public Information in relation to the Financial Instruments of the Bank and also recommendations and offers on execution of transactions with Financial Instruments;

2.2.3. information and (or) findings based on it transferred by IIB and (or) a person engaged by it to potential buyers or used by IIB and (or) a person engaged by it to give recommendations or to otherwise encourage potential buyers to buy respective securities in the case of placement (organization of placement) and (or) offering (organization of offering) of issuance securities of IIB, provided that a notification is given to potential buyers to the effect that they may use such information exclusively for making a decision on purchase of the securities being placed (offered).

3. DEALING WITH THE BANK INSIDERS

3.1. The CD shall compile the List of Categories of Persons Classified as Insiders, which shall be reviewed by the Finance Committee and approved by the Bank Order. The List of Categories of Persons Classified as Insiders is given in [Appendix 1](#).

3.2. Based on the List of Categories of Persons Classified as Insiders and on information provided by structural divisions, the CD shall compile the list of the Bank Insiders.

3.3. In order to identify legal entities to be included in the list of the Bank Insiders or excluded from the list of Insiders, structural divisions the competencies of which include initiation, signing, maintenance, and termination of contracts (agreements) under which Insider Information of the Bank

is transferred / ceased to be transferred, shall notify the CD by corporate email no later than within one (1) business day from the date of receipt of such information by the structural division.

The structural division shall submit the information to the CD, attaching a draft resolution to be passed by the CD Director on classifying the legal entity as an IIB Insider according to [Appendix 3](#) and also attaching copies of contracts (agreements):

3.3.1. The FD shall submit information about external auditors;

3.3.2. The LD shall submit information about legal entities being legal advisors of the Bank (except for advisors engaged within the scope of lending and investment activities);

3.3.3. The SDFD shall submit information about the rating agencies of the Bank and arrangers of placement of Financial Instruments of the Bank.

3.4. In order to identify natural persons to be included in or excluded from the list of Insiders of the Bank, the HRD shall, no later than within one (1) business day from the date of receipt of information about the Insider, notify the CD by corporate email, attaching a draft resolution, for the decision to be made by the CD Head to classify the Individual as an IIB Insider according to Appendix 2, about the following Insiders of the Bank:

- members of the Board, upon their election/appointment, expiration of powers of the said persons, early termination of powers;
- unit heads, department heads and their deputies, when they are hired, transferred and dismissed.

3.5. In order to identify individuals to be included in or excluded from the list of Insiders of the Bank, the BA shall, no later than within one (1) business day from the date of receipt of information about the Insider, notify the CD by corporate email, attaching a draft resolution, for a decision to be made by the CD Head to classify the Individual as an IIB Insider according to [Appendix 2](#), about the members of the Bank Council, the Board of Directors, the Audit Committee in case of their election/appointment, expiry of their powers, early termination of powers.

3.6. In order to identify individuals to be included in or excluded from the list of the Bank Insiders, Secretaries of the Bank Committees whose competencies include handling Insider Information shall, no later than within one (1) business day after the day of receipt of information about the Insider, notify the CD by corporate email about members of the Bank Committees upon their election/appointment, expiry of their powers, early termination of powers.

3.6.1. The CD shall, upon receipt of the information from the Secretaries, within one (1) business day from receipt of the information, submit to the HRD an inquiry for personal information about the employee via corporate email.

3.6.2. The HRD shall, no later than on the next business day from the date of receipt of the inquiry from the CD, send a reply in the form of a draft resolution via corporate email for a decision to be taken by the CD Head to classify the individual as IIB Insider according to [Appendix 2](#).

3.7. The HRD shall inform the CD via corporate email about the change of the surname, first name and patronymic of the Insider being an individual.

3.8. The CD shall, upon receipt of information from structural divisions and Secretaries, within five (5) business days from the date of its receipt, include/exclude the person having access to the Insider Information of the Bank in/from the list of the Bank Insiders in accordance with Clauses 5.1–5.2 of this Procedure or request additional information, including confirmation of grounds for inclusion/exclusion of this person in/from the list of the Bank Insiders.

3.9. Signing contracts with the Bank employees and/or Insiders, Structural divisions of the Bank shall include provisions on the duty to observe the requirements of this Procedure (if applicable).

4. MAINTENANCE AND KEEPING OF THE LIST OF THE BANK INSIDERS

4.1. The List of the Bank Insiders shall be maintained by the CD.

4.2. The CD obligations shall include:

- analysis of information obtained from structural units;
- maintenance of the List of Insiders;
- timely formation and sending to Insiders of a Notice on addition of the person to the List of Insiders (removal of the person from the List of Insiders) according to the form of [Appendix No. 4](#) and in accordance with Section 5 of the Procedure;
- organization of collection of documents evidencing the receipt of notices;
- formation of and keeping folders related to the persons included in the List of Insiders;
- issuance of a resolution according to the form set out in [Appendices No. 2](#) and [No. 3](#) to this Procedure.

4.3. The List of Insiders shall be maintained in electronic form subject to the requirements of Regulation [3] according to the form set out in [Appendix No. 5](#).

4.4. When a person is added to the List of Insiders, an electronic folder shall be formed for that person, containing:

- the resolution on addition/removal of the person to/from the List of Insiders;
- a copy of the Notice on addition of the person to List of Insiders (removal from the List);
- other documents (their copies).

4.5. The folders shall be kept by the CD for 5 years from the date of removal of the person from the List of Insiders; the Lists of Insiders shall be permanently kept by the CD in accordance with the file nomenclatures of the department.

5. NOTIFICATION OF PERSONS ON INCLUSION IN / EXCLUSION FROM THE LIST OF INSIDERS

5.1. The CD shall prepare, sign, and send a notice on inclusion/exclusion of a person in/from the List of Insiders, based on the form set out in [Appendix 4](#)¹ to this Procedure, to such a person no later than within seven (7) business days from the date of inclusion/exclusion of this person in/from the List of Insiders.

5.1.1. Notices concerning members of the Board of Governors, the Board of Directors and the Audit Committee shall be sent with assistance from the BA via agreed communication channels.

5.1.2. Notices concerning the Bank Insiders being legal entities shall be sent with assistance from supervising divisions interacting with such legal entities (FD, LD, SDFD, etc.) via agreed communication channels.

5.1.3. Notices concerning the Bank Insiders being employees shall be prepared in hard copy form and sent by the CD on its own in the form of a scanned copy via the electronic workflow system.

5.2. The notice shall be sent to the most recent address of the Insider known to the Bank. Preference shall be given to email addresses.

5.3. The Bank Insiders receiving notices of their inclusion in the list of the Bank Insiders shall send notices to the Bank about transactions with Financial Instruments of the Bank executed by them

¹ The reverse side of the Notice of inclusion of a person in the List of Insiders shall contain information about the requirements of this Procedure in respect of the Bank Insiders and other additional information.

within ten (10) business days after execution of the respective transaction. Notices shall be prepared in a free form, specifying the full name/company name of the Insider, the Individual Taxpayer Number (INN) (if applicable), the name of the Financial Instrument of the Bank, the place of the transaction execution, the registration number of the Financial Instrument, its quantity, the transaction type (purchase/sale), the transaction price, and the transaction date.

5.3.1. Requirements of Clause 5.3 shall not apply to members of the Board of Governors, the Board of Directors and the Audit Committee.

5.4. In case of change of one of the following details of the Bank: the Bank name, location, or another address at which the Bank receives mail, contact phone numbers, fax numbers and the email address of the Bank, the responsible unit of the Bank shall notify all persons included in the list of Insiders about the changes that have occurred within five (5) business days from the date of the changes by publication of this information on the official website of the Bank in the Internet.

5.5. At the request of a person included/excluded in/from the list of the Bank Insiders, the CD shall, no later than within seven (7) business days from the date of receipt of the respective request by the Bank, send (issue) to such a person a copy of the notice signed by the CD Head in hard copy or electronic form.

6. PROHIBITION OF USE OF INSIDER INFORMATION

6.1. It is prohibited for the Bank employees and Insiders to use Insider Information:

– for execution of transactions with Financial Instruments of the Bank to which Insider Information relates, using their own funds or funds of a third party, with the exception of execution of transactions within the scope of fulfilment of the obligation to buy or sell Financial Instruments which has come due, if such an obligation has arisen as a result of a transaction executed before the Insider Information became known to the person;

– by its transfer to another person, unless such information is transferred to a person included in the List of Insiders in connection with performance of the job duties by this person; Requirements of this clause shall not apply to situations when information is transferred by members of IIB Board of Governors and the Board of Directors to a person not being an insider by virtue of their performance of job duties.

– by giving recommendations to third parties, obliging or otherwise encouraging them to buy or sell Financial Instruments of the Bank.

7. INSIDER INFORMATION ACCESS PROCEDURE

7.1. The Bank Insiders shall access the Insider Information of the Bank on the basis of the employment, commercial and other contracts concluded with them, on the basis of decisions of the Board of Governors, the Board of Directors and the Management Board of the Bank.

7.2. The Bank employees shall access Insider Information of the Bank and its clients in compliance with the requirements of Regulation [3].

7.3. Access to Insider Information for persons that are not Insiders of the Bank shall be formalized on the basis of an application sent to the CD stating the grounds for the necessity to obtain specific information, the necessity to copy that information with the use of equipment, and the necessity to disclose the information to third parties, specifying the third parties to which it is planned to disclose it.

7.4. Upon review of the application referred to in Clause 7.3. of this Procedure, the CD shall, no later than within 3 working days from the date of its receipt, make a decision to grant or to deny

the person access to the Insider Information requested by him or her, and the person that submitted the application shall be notified accordingly.

8. RULES OF INSIDER INFORMATION CONFIDENTIALITY PROTECTION

8.1. The persons having access to Insider Information and the persons that obtained access to Insider Information in accordance with Clause 7.3. of the Procedure shall be obliged:

8.1.1. To keep Insider Information confidential in accordance with Regulation [3];

8.1.2. in case of loss of the status of a person having access to the Insider Information, to transfer to the Bank the media containing Insider Information available to him or her;

8.1.3. To inform promptly his/her line manager or a person acting for his/her, the Bank – in relation to legal entities, members of the Board of Governors, the Board of Directors, the Audit Committee about loss or shortfall of documents, files containing Insider Information, keys to safe deposits, entry passes, passwords or in case of detection of unauthorized access to Insider Information, etc.

8.2. The Bank shall ensure the required organizational and technical conditions for observance of the established confidentiality regime by the persons having access to Insider Information.

8.3. The Bank employees shall be obliged, in accordance with Procedure [4], to notify the line manager and the CD of the Bank of any facts that have become known to them:

8.3.1. Concerning Insider Information of the Bank that is not subject to disclosure to them in accordance with their job duties, but has become known to them, *inter alia*, from the Bank counterparties or other persons;

8.3.2. Concerning any misuse, including the use of Insider Information of the Bank for the benefit of the Bank employees, the Bank Insiders and their close family members.

9. ACTIONS CLASSIFIED AS MARKET MANIPULATION

9.1. The following actions, classified under this Procedure as market manipulation, shall be prohibited:

9.1.1. Wilful dissemination through mass media of knowingly false information causing the price, demand, supply, or Bank Financial Instrument trading volume to deviate from the level or be maintained at a level substantially different from the level which would have formed without dissemination of this information.

The values of criteria of a substantial deviation of the price, demand, supply, or the Financial Instrument trading volume shall be determined by the CD on its own and with involvement of other structural divisions of the Bank, if necessary;

9.1.2. Execution of transactions with the Financial Instrument of the Bank based on a prior agreement between trading participants or persons at the expense or on behalf of which these transactions are executed, as a result of which the price, demand, supply, or the Financial Instrument trading volume deviated from the level or were maintained at a level substantially different from the level which would have formed without such transactions²;

9.1.3. Execution of transactions under which the obligations of the parties are fulfilled at the expense and on behalf of one person, as a result of which the price, demand, supply, or volume of

² Clauses 9.1.2, 9.1.3, and 9.1.4 shall apply to organized trading where transactions are executed based on orders addressed to all trading participants, if information about the persons placing the orders and the persons on behalf of which the orders were placed is not disclosed to other trading participants

trading in the Financial Instrument of the Bank deviated from the level or were maintained at a level substantially different from the level which would have formed without such transactions;

9.1.4. Placing orders at the expense and on behalf of one person, as a result of which two or more opposite orders appear in the organized trading, in which the buying price of the Financial Instrument of the Bank is higher or equal to the selling price of the same Financial Instrument, if based on such orders transactions were executed as a result of which the price, demand, supply, or volume of trading in the Financial Instrument of the Bank deviated from the level or were maintained at a level substantially different from the level which would have formed without such transactions;

9.1.5. Execution of several transactions within one trading day in organized trading at the expense or on behalf of one person based on orders which had the highest buying price or the lowest selling price for the Financial Instrument of the Bank at the moment of placement, as a result of which their price deviated substantially from the level which would have formed without such transactions, for subsequent execution of opposite transactions at the expense or on behalf of the same person at such prices and further execution of such opposite transactions;

9.1.6. Execution of several transactions within one trading day in organized trading at the expense or on behalf of one person for misrepresentation as to the price of the Financial Instrument of the Bank, as a result of which the price of the Financial Instrument was maintained at a level substantially different from the level which would have formed without such transactions;

9.2. Actions defined in Paragraphs 9.1.2 – 9.1.6 of this Procedure shall not be classified as market manipulation if they are aimed at:

9.2.1. Maintenance of the prices for Financial Instruments of the Bank in connection with offering and circulation of Financial Instruments and are performed by trading participants under a contract with the issuer or a person liable under the Financial Instruments;

9.2.2. Maintenance of prices, demand, supply, or volume of trading in the Financial Instrument of the Bank and are performed by trading participants under a contract where one of the parties is the trading organizer.

9.3. For prevention of market manipulation, information during market sounding and transaction-related marketing shall be used in accordance with the Procedure regarding IIB's code of conduct regarding the Market Sounding and Deal-related Marketing activity related to the process of issuance of IIB's bonds on various markets (Annex No. 6).

10. UNLAWFUL DISSEMINATION OF INSIDER INFORMATION

10.1. The Bank Insiders and employees may disseminate Insider Information only in compliance with the requirements of this Procedure.

10.2. Disseminating Insider Information, the Bank employees shall comply with the requirements of the laws of the countries in the territories and markets of which such information is disseminated or Financial Instruments of the Bank are traded/circulated.

10.3. The unlawful dissemination of Insider Information also includes recommendations and advice based on Insider Information in execution of transactions with Financial Instruments of the Bank, given to persons which are not Insiders.

11. INTERNAL CONTROL MEASURES

11.1. The CD shall implement the following internal control measures for countering misuse of Insider Information and market manipulation:

11.1.1. Send inquiries to the Bank structural units regarding transactions with Financial Instruments of the Bank executed by Insiders;

11.1.2. Review Insiders' Notices on the transactions executed with Financial Instruments of the Bank;

11.1.3. Form and control completeness and relevance of the List of Insider Information;

11.1.4. Control maintenance of the List of Insiders, the addition/removal of Insiders to/from the List of Insiders, and their notification about such addition to/removal from the List of Insiders;

11.1.5. Control compliance with the requirements of this Procedure by the structural units dealing with Insider Information and by Insiders.

11.2. The CD shall annually prepare a report including a list of implemented internal control measures for countering misuse of Insider Information and market manipulation, including based on the results of investigations carried out by the CD based on notifications according to Clause 8.3. of this Procedure.

12. RESPONSIBILITY

12.1. The Bank Insiders shall be responsible for fulfilment of the requirements of this Procedure.

12.2. The Bank Insiders violating the requirements of this Procedure may be subjected to measures provided for by requirements of IIB regulations, employment, civil, and other contracts signed with them, decisions of authorized bodies of the Bank and its member states.

13. RECEIPT OF NOTICES BY THE BANK CONCERNING INCLUSION OF A THIRD PARTY IN THE LIST OF INSIDERS

13.1. Upon receipt of a notice on inclusion of IIB in the list of Insiders of any third party, the CD may initiate signing of this notice, requesting this person to provide grounds for its inclusion in the list of Insiders, determination of the list of employees having access to Insider Information of the person which sent the notice, and sending information to the third party about transactions with financial instruments of this person.

13.2. If necessary, in addition to the actions mentioned in Clause 13.1, the CD and the structural divisions of the Bank may initiate other actions, including mutually beneficial exchange of information with national regulators, required to prevent market manipulation, unlawful use and dissemination of the third party Insider Information.

14. FINAL PROVISIONS

14.1. If amendments are introduced into the Agreement Establishing the International Investment Bank and its Charter, and, if applicable, other internal regulations of the Bank, this Procedure and amendments hereto shall be applicable inasmuch as they do not contradict the newly adopted regulations, the Agreement Establishing the International Investment Bank and its Charter.

15. LIST OF DOCUMENTS REFERRED TO HEREIN

1. Code of Conduct of International Investment Bank (OND-32), approved by Order No. 61 dated June 11, 2019;

2. The Code of Ethics of the Board of Directors of International Investment Bank (OND-80), approved by the resolution of IIB Board of Governors (Clause 2 of the Minutes of the 1/110th meeting of IIB Board of Governors dated December 4, 2018);

3. Regulation on the Procedure for Ensuring Protection of Confidential information in International Investment Bank (REG-27), approved by Order No. 116 dated May 28, 2010 (the most recent version);

4. Procedure for Receiving and Handling Complainant Reports in International Investment Bank (PDK-69), approved by Order No. 50 dated May 17, 2016.

16. LIST OF REGULATIONS BECOMING VOID WITH ADOPTION OF THIS DOCUMENT

With adoption of this document, the Procedure of Dealing with the Insider Information and Insiders of International Investment Bank approved by Order No. 60 dated June 9, 2016 shall become void.

List of Categories of Persons Classified as the Bank Insiders

1. Members of the Board of Governors of the Bank;
2. Members of the Board of Directors of the Bank;
3. Members of the Management Board of the Bank;
4. Members of the Audit Committee;
5. Members of the Bank committees (the Finance Committee, the Credit Committee);
6. Heads of sections;
7. Directors and Deputy Directors of the Bank units;
8. External auditors of the Bank;
9. Legal advisors, except for lending projects advisors;
10. Rating agencies assigning ratings to the Bank and its Financial Instruments;
11. Arrangers of offerings of Financial Instruments of the Bank.

Resolution on addition/removal of a person to/from the List of Insiders (for an Insider being an individual)

“ ___ ” _____ 202_

Surname, forename and patronymic (if applicable) of the Insider	
Date of birth of the Insider	
Place of birth of the Insider	
Position of the Insider in IIB (if applicable)	
Name of the Insider’s Organization (if applicable)	
Position in the Insider’s Organization (if applicable)	
Category of the Insider (e.g. a member of the Board of Governors, the Board of Directors, the Management Board, the Audit Committee, a committee, head of a section, director or deputy director of a unit)	
Event type (specify “addition to the List of Insiders” or “removal from the List of Insiders”)	
Grounds for addition/removal of the person to/from the List of Insiders (e.g. appointment to/dismissal from the position ___)	
<i>Date of addition of the person to the List of Insiders (removal of the person from the List of Insiders) – to be completed by the CD</i>	

Head of the Compliance Department _____
 Patronymic, Surname

Forename,

**Resolution on addition/removal of a person to/from the List of Insiders
 (for an Insider – legal entity)**

“ __ ” _____ 202_

Full company name of the legal entity (for a non- profit institution – name)	
Taxpayer Identification Number of the legal entity (if applicable)	
Location of the legal entity or mailing address	
Insider Category (specify: an external auditor, a legal advisor, a rating agency or an arranger of offerings of financial instruments of the Bank)	
Event type (specify: “addition to the List of Insiders” or “removal from the List of Insiders”)	
Grounds for addition/removal to/from the List of Insiders (e.g.: entering into/termination of agreement No. __ of __)	
Date of addition of the legal entity to the List of Insiders (removal of the legal entity from the List of Insiders) – <i>to be completed by the CD</i>	

Head of the Compliance Department _____
 Patronymic, Surname

Forename,

Dated _____ 202_ No. _____

Addressee:

NOTICE
on addition of a person to the List of Insiders
(removal of a person from the List of Insiders)

No.	I. Information on IIB	
1.1.	Full business name	International Investment Bank
1.2.	Taxpayer Identification Number of the Organization	30479900-1-51
1.3.	Location of the Organization	188 Vazi Avenue, Budapest, H-1138, Hungary
1.4.	Phone number of the Organization	+36 1 727 8888
1.5.	Fax number of the Organization	+ 7 (499) 975-20-70
1.6.	E-mail	grigory.gruzinov@iibbank.com
1.7.	Surname, forename and patronymic of the contact person	Grigory Aleksandrovich Gruzinov
No.	IIa. Information on the person included in the List of Insiders of the Organization (for individuals)	
2.1	Surname, forename and <u>patronymic</u> of the Insider	
2.2	Date of birth of the Insider	
2.3	Place of birth of the Insider	
2.4.	Name of the Organization	
2.5.	Position in the organization	
No.	IIb. Information on the person included in the List of Insiders of the Organization (for legal entities)	
2.1.	Full business name of the Insider	
2.2.	Taxpayer Identification Number of the legal entity (if applicable)	
No.	III. Information on the grounds for forwarding the Notice	
3.1	Grounds for forwarding the Notice	
3.2.	Date of addition in /removal from the List of Insiders	
3.3.	Grounds for addition /removal of the person to/from the List of Insiders	
3.4.	Financial Instrument	

Head of the Compliance Department _____
Patronymic, Surname

Forename,

The reverse side of Appendix 4**
*to the Procedure of Dealing with the Insider
Information and Insiders of International Investment
Bank*

About the requirement to the Bank Insiders in accordance with the Procedure of Dealing with Insider Information and Insiders of International Investment Bank:

1. In accordance with section 6 you shall not use inside information:
 - for execution of transactions with Financial Instruments of the Bank to which Insider Information relates, using your own funds or funds of a third party, with the exception of execution of transactions within the scope of fulfilment of the obligation to buy or sell Financial Instruments which has come due, if such an obligation has arisen as a result of a transaction executed before the Insider Information became known to you;
 - by its transfer to another person, unless such information is transferred to a person included in the List of Insiders in connection with performance of the job duties by this person;
 - by giving recommendations to third parties, obliging or otherwise encouraging them to buy or sell Financial Instruments of the Bank.
2. According to Clause 5.3. you shall notify the Bank about transactions with the Bank's Financial Instruments, conducted by you within 10 (ten) business days after the respective transactions are conducted. Notices shall be prepared in a free form, specifying the Insider's full name, Individual Taxpayer Number (INN) (if applicable), the name of the Bank's Financial Instrument, the place of the transaction, the registration number of the Financial Instrument, its quantity, type of operation (purchase/sale), the transaction price, and the transaction date.
3. According to Clause 12.2. you may be subjected to measures provided for by requirements of IIB regulations, employment, civil, and other contracts signed with them, decisions of authorized bodies of the Bank and its member states.

The legislation of some IIB member states provides for criminal liability for misuse of Insider Information and market manipulation.

* Clauses 2 and 3 do not apply to members of the Board of Governors, the Board of Directors and the Audit Committee.

Appendix No.5
*to the Procedure of Dealing with the Insider
 Information and Insiders of International Investment
 Bank*

The List of the Bank Insiders

(the beginning)

No.	Full name/ legal name	Pers on/ Enti ty	Insider Category	Date of birth	Place of birth	TIN (a legal entity)	Registered address / location	Agreement based on which the Insider (legal entity) is included in the List of Insiders

(continued)

Date of receipt of the Resolution on addition to the List of Insiders	Date of addition to the List of Insiders	Notice registration date	No. No.	Date of the Notice dispatch	Grounds for addition	Delivery (against signature / a mark by Russian Post)

(continued)

Date of receipt of the Resolution on removal from the List of Insiders	Date of removal from the List of Insiders	Notice registration date	No. No.	Date of dispatch of Notice on removal from the List of Insiders	Grounds for removal from the List of Insiders	Delivery (against signature/ mark by Russian Post)

(continued)

Date of surname/ legal name change	Previous surname /legal name	Comments