

Approved by the resolution of
the Board of Directors of
OJSC SISTEMA JSFC
Minutes #04-10 _____
of “17” April 2010

INFORMATION POLICY

Open Joint-Stock Company SISTEMA Joint-Stock Financial Corporation



Moscow, 2010

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1. GENERAL PROVISIONS

1.1. Purposes of this Policy

This Policy has been developed under the effective legislation of the Russian Federation, the Charter, the Corporate Code of Conduct and other internal documents of OJSC SISTEMA JSFC (hereinafter referred to as the ‘Corporation’), as well as under the Russian and British Securities Market Regulators’ rules and requirements applied to the Corporation by virtue of circulation of its shares on the Russian exchanges and circulation of its securities in the form of the Global depositary receipts on the London Stock Exchange.

This Policy contains a description of composition of the information subject to compulsory disclosure by the Corporation, the procedure and ways of its disclosure, as well as the limitations to unauthorized distribution, disclosure and use of the information regarding the Corporation business. This Provision also defines the ways and composition of the information being published by the Corporation, or communicated externally by other ways to provide for the building of the Corporation objective image externally, as well as of the fair presentation of the Corporation business and the results of such business, in line with the best practices of corporate governance.

This Policy contains the basic principles that are fundamental for the Corporation activities in the field of external communications and information disclosure and that are used by the respective subdivisions to make decisions in the course of their discharging routine responsibilities and drafting regulations for interaction in certain fields of external communications and information disclosure.

This Policy provides for the key principles of organization of the information flow from the Corporation in the following cases:

- disclosure of information in accordance with the requirements of the regulators of the securities market of the Russian Federation;
- disclosure of information in accordance with the requirements of the regulators of the securities market of the United Kingdom;
- information support of the by corporate procedures;
- additional disclosures for the purpose of sufficient transparency of the Corporation;
- control of use of material nonpublic information;
- organization of conference calls, conferences and public meetings;
- publication of press releases.

Principles set in this policy may be additionally regulated by internal documents of the Corporation, adopted by the set by the order of the Sole executive body or decision of the Collective executive management body of the Corporation.

1.2. Policy goals

Application of the key principles, formulated in the Policy is in the first place aimed at:

- Higher level of openness and trust in the relationship between the Corporation, its shareholders, security holders, investors, creditors and other interested parties, as well as of ensuring their rights and legitimate interests;
- Providing for the meeting the requirements of the Russian Federation legislation and the Russian and British Securities Market Regulators with regard to mandatory disclosure of information and best practices;

- Maintaining professional and confidential relations of the Corporation with the press which are based on the free exchange of fair information without prejudice to any rights and legitimate interests of shareholders, security holders, creditors and other interested parties;
- Providing access to true and objective information regarding the Corporation business for the investment community, specifically the analysts, shareholders, security holders, investors, creditors and other interested persons, as well as the professional securities market players, regulators and government authorities;
- Providing shareholders with the information required for decision making related to execution of their right to take part in the Corporation governance;
- Higher level of the Corporation transparency and corporate governance.

1.3. Glossary of terms and abbreviations

Term	Abbreviation	Definition of the term (meaning of the abbreviation)
Corporation		Open Joint Stock Company “Joint Stock Financial Corporation Sistema”.
The UK Regulatory Information Service	RIS	Group of specially authorised organizations interacting with the UK regulatory bodies and issuers of securities with the aim of collecting, distributing and ensuring accessibility of Material non-public information about the issuers in the interests of the investment community.
The UK Financial Services Authority	FSA	Organization vested with regulatory and supervisory powers in the UK securities market.
The UK Listing Authority	UKLA	A body authorized by the UK legislation to define the listing rules for the companies issuing securities on the UK Stock Exchanges and check compliance with these rules.
Global Depository Receipts	GDRs	Global depository receipts of the Corporation admitted to trading on the London Stock Exchange.
Subsidiaries and affiliates	S/As	Companies where due to holding a majority interest in their authorized capital or on the basis of a signed contract or in some other ways, the respective person is entitled to form the decisions taken by such company, as well as the companies where such a person is entitled to hold at least 20% of votes .
Insider		An individual or a legal entity in possession of Material non-public information due to: <ul style="list-style-type: none"> - Membership/participation in the management bodies or supervisory authorities of the Corporation, its subsidiaries and affiliates and other entities having access to Material non-public information about the Corporation; - Employment relationship or fulfillment of professional duties, including in the capacity of External Consultants of the Corporation; - Ownership of Securities of the Corporation; - Granting loans or credits to the Corporation; - Committing wrongful or criminal acts; - Other circumstances if the person is aware (or is supposed to be aware) , of having gained access to Material non-public information; Kin relations with individuals specified above.
Material non-public information		Not publicly available information directly or indirectly related to the Corporation or its S/As, including financial operations, financial indicators, business, strategy, acquisitions, credit and loan obligations, changes in the capital structure or the value of Securities of the

Term	Abbreviation	Definition of the term (meaning of the abbreviation)
		Corporation or its S/As or transactions with these Securities which, if publicly available, would probably have a considerable impact on the market value of the Corporation's Securities and /or related investments and probably would be taken into consideration by a reasonable investor in taking decision on investing and would influence such a decision. Material non-public information may also be constituted by non-public information on new large-scale business segments and business achievements of the Corporation or its S/As or on changes in any information related to the Corporation and S/As communicated to the investment community earlier.
Insider deals		- Concluded or attempted by the Insider deal with Securities on the basis of Material non-public information.
Blackout period		Time period preceding disclosure of financial statements of the Corporation, during which the Insiders are forbidden to conclude Deals with Securities of the Corporation.
Policy		This Policy
Disclosure Rules		Requirements to disclosure of information by the issuers of securities set out in the RF Federal Law "on securities market", the UK Listing Rules, Disclosure Rules and Transparency Rules and other applicable laws and /or requirements of the Regulators
President		The sole executive management body of Sistema JSFC acting on the basis of the Charter and Terms of Reference of the President.
Disclosure of information /Disclosure		Performance of a number of activities aimed at ensuring public availability of material non-public information about the Corporation to the investment community and all the interested parties, including publication of press-releases, performed by the Corporation in line with the requirements of the legislation on disclosure of information by the issuers of securities, in the order established by the Disclosure Rules including disclosure of information on: <ul style="list-style-type: none"> - Acquisition or divestment by the Corporation of significant assets or Securities including shares and /or holdings in the authorized capital of other companies; - Business of the Corporation, its Securities and related investments; - Facts of issuing and /or listing Securities of the Corporation, buyout or redemption by the Corporation of its own shares, GDRs and other Securities; - Annual financial statements of the corporation, including auditor and managerial reports; Extraordinary general meetings of shareholders etc.
Regulators		Federal Financial Markets Service of the Russian Federation, the UK Financial Services Authority (FSA), the UK listing authority (UKLA), the UK regulatory Information Service (RIS) and other authorized organizations vested with regulatory, supervisory and other powers on the security markets of the Russian Federation and /or the UK.
Deal or Deal with Securities		- Acquisition or divestment, as well as attempts to acquire or divest any Securities, subscription to options and /or their disposal, conclusion of agreements where the amount of payments depends on the value of the basic Securities or where the financial risks are changed depending on the fluctuation of the

Term	Abbreviation	Definition of the term (meaning of the abbreviation)
		market value of Securities, as well as pledge and other types of encumbrances etc.
Related parties		Applicable to Insider represented by a legal entity - means its affiliated legal entities and individuals, and applicable to Insider represented by an individual - means relatives.
Employees (incl. "Officials" and /or "members of the management bodies")		Members of the Board of Directors, President and members of the Management Board of the Corporation, as well as any other directors or staff of the Functions, Departments, Directorates and other structural subdivisions of the Corporation (incl. full-time employees and outsourced staff), working under employment, commercial and other contracts, or cooperating with the Corporation on other terms, including in the capacity of agents, representatives etc. on temporary or permanent basis.
Insiders List		A register kept by the Corporation listing the Employees of the Corporation, External Consultants and their representatives, as well as other persons which have permanent or temporary access to the Material non-public information about the Corporation.
Structural subdivision / Subdivision		Officially designated structural organizational unit of Sistema JSFC or S/As with independent objectives and functions including Business Unit, Function, Department, Directorate, Unit etc, conducting activities on the basis of the charter, regulations or other internal documents of the company.
FFMS	FFMS	Federal Financial Markets Service of the Russian Federation.
Securities		Shares, GDRs, bonds, other debt obligations, promissory notes, other securities (incl. convertibles), as well as security options (incl. call and put options), phantom shares etc.
Analysts		Representatives of the investment community conducting economic, financial, investment analysis of Sistema JSFC with the aim of preparing reports and recommendations on securities of Sistema JSFC Group of companies, as well as for other opportunities of investing in the Corporation.
Best practice in corporate governance		Generally accepted form of organization and elements of the corporate governance system which are reflected, among other things, in the corporate governance codes of the leading world's countries and methodologies for assigning corporate governance ratings by the world's leading rating agencies.
Material information		Information which with high degree of probability will be deemed important by a reasonable investor when making a decision related to investments, or which with high degree of probability will be deemed important by a reasonable partner during making decision on entering into contractual relationship with the Corporation, or if such information will greatly change the general perception of the Corporation by the investment community or other interested parties
Rumours		Information based on actual or fictitious events which is not sufficiently reliable to provide grounds for taking informed investment decisions.
Significant /core subsidiaries and affiliates		Significant /core subsidiaries and affiliates in accordance with the International Financial Reporting Standards applied in the Corporation.
Disclosure Committee		A body established in Sistema JSFC to enable decision-making on the items covered by this Policy.

2. PRINCIPLES OF INFORMATION DISCLOSURE AND CONTROL OF ITS USE

The basic principles of the Corporation information policy are as follows:

- **Completeness and fairness of the information being disclosed**

The Corporation shall publicly disclose fair information regarding its business, as well as the material events and facts of positive and negative nature within the scope that reasonably makes it possible to generate the most complete and unbiased perception of the Corporation.

The disclosures of material events and facts made by the Corporation shall, in any case, be considered as material if a reasonable investor would, with a high degree of probability, consider it relevant when making a decision on entering into contractual relationship with the Corporation, or such information would change significantly general perception of the Corporation by the investment community and other interested parties. In any case, such information shall include without limitation the following:

- Information about the financial results of the business of the Corporation and its material subsidiaries;
- Information about the strategy of development of the Corporation and its material subsidiaries and affiliated companies;
- Information about completed or concluded M&A transactions, on submitted offer to purchase shares, executed or concluded joint venture transactions, as well as the information about executed or concluded transactions that imply change in the structure of capital or assets of the Corporation;
- Information about the concluded major contracts and agreements with suppliers or customers of the Corporation or its material subsidiaries and affiliated companies;
- Information about the change of management of the Corporation and its major subsidiaries and affiliated companies;
- Information about the change in the majority shareholders of the Corporation and its material subsidiaries and affiliated companies;
- Information about the general shareholders meetings and their results;
- Information about the events that concern securities of the issuer, securities issue, fulfillment or non-fulfillment of obligations to the securities holders, change of the scope of rights of the securities holders, etc.;
- Information about the management of the Corporation, members of the Board of Directors, the President, the Management Board members, the chief executives of the major subsidiaries and affiliated companies;
- Information about the corporate governance system and the organizational structure of the Corporation;
- Information about the HR policies and motivation programs;
- Information about implementation of the corporate social responsibility programs.

- **Timeliness of information disclosure**

The information about the business results and material events and facts that can affect the Corporation business activities and interests of the shareholders, security holders and other interested parties, shall be disclosed by the Corporation without undue delay, taking into consideration that the information can be of actual or potential value for its recipients only provided that it was timely disclosed.

- **Providing for equal terms of the access to information**
 By disclosing information publicly, the Corporation shall contribute to equal rights and opportunities for the Corporation shareholders, security holders, investors, creditors and any other parties interested in obtaining such information. However, the Corporation may provide certain individuals with more information required to fulfill contractual obligations or execution of the shareholders' rights under the applicable law.
- **Regularity of information disclosure and its timely update**
 The information about the Corporation business and material events and facts shall be disclosed and updated on a regular basis with the use of the publicly available means.
- **Protection and control of distribution and use of the material nonpublic (insider) information, as well as of the personal data and information being the state or commercial secret**
 The Corporation shall endeavor to prevent using the material nonpublic (insider) information about the Corporation by the owners of such information to their personal advantage. For this purpose, the Corporation shall establish a ban on insider deals and manipulation of the market. The Corporation shall establish control over the use of the insider information by the contractors and maintain the publicly available lists of the persons, having regular or occasional access to the material nonpublic (insider) information. The Corporation shall also comply with the requirements of the laws of the Russian Federation that restrict or prohibit dissemination of personal data, as well as the data being investigation or judicial proceedings secret, the state, official or commercial secret, by using the proper ways and means to protect such information;
- **Compliance with the Securities Market Regulators' requirements and rules**
 The Corporation shall comply in full with the requirements of information disclosure and disclosure rules and rules of the usage of material nonpublic (insider) information, established by the Russian and British Securities Market Regulators, as well as apply the standards of the relevant best practices, specified in the effective internal documents of the Corporation;
- **No rumors policy**
 As per the policy of the Corporation, communications with shareholders, security holders, investors, creditors and any other parties interested in obtaining respective information are based only on the established true facts. The Corporation shall spread and comment no rumors. If it becomes apparent that the Corporation itself is a source of rumors, or the existing rumors have an material impact on the market volatility, the Corporation shall consider an opportunity for making a respective statement in response to the market rumors, and if the rumors are expressly based on the true material nonpublic information, the confidentiality of which the Corporation is no longer able to provide for, the Corporation shall disclose the material nonpublic information being the origin of such market rumors.
- **Application of discretionary categories of this policy, Disclosure Committee**
 This Policy applies a number of discretionary categories such as material information, true established fact, etc. When the mentioned categories are applied in practice, the Corporation subdivisions and employees responsible for the implementation of information policy shall independently apply the aforesaid categories in each specific case. The Corporation has also established a Disclosure Committee which is a collegial body authorized to make decisions on application of this policy in complicated

ambiguous cases. The Corporation employees responsible for the information policy implementation shall be entitled to apply to the Disclosure Committee with any matter related to application of this information policy.

3. INFORMATION DISCLOSURE IN ACCORDANCE WITH THE REQUIREMENTS OF THE RUSSIAN FEDERATION LAW

3.1. Content of the information to be disclosed publicly in accordance with the requirements of the Russian Federation legislation

According to the Russian Federation legislation standards and requirements, the Corporation shall publicly disclose the following information prepared in accordance with the requirements of the Russian Federation securities market legislation:

- Issuer's quarterly reports;
- Issuer's annual reports prepared in accordance with the requirements of the RF legislation on joint-stock companies and securities market¹;
- Annual financial statements;
- Issuer's securities prospectuses, resolutions on issue of the Issuer's securities, reports on securities placement results (notifications of the securities issue results);
- Notifications regarding the stages of issue of the securities, the list of which is established by the effective regulations of the FFMS, namely, specifically the messages at the following stages of issue:
 - Making a decision on securities placement;
 - Approval of the decision on securities issue (additional issue);
 - State registration of the securities issue (additional issue);
 - Securities placement.
- Notifications regarding the material facts, the list of which is established by the effective regulations of the FFMS, specifically:
 - Data regarding reorganization of the issuer, its subsidiaries and affiliated companies;
 - Data regarding the facts that have entailed a single increase or decrease in the issuer's assets value in more than 10 percent;
 - Data regarding the facts that have entailed a single increase (decrease) in the issuer's net profit or net loss in more than 10 percent;
 - Data regarding the facts of the single issuer's transactions, the scope of which or the value of the assts involved is 10 and more percent of the issuer's assets as of the date of such transaction;
 - Data regarding the stages of the securities issue procedure;
 - Data regarding suspension and reopening of the securities issue;
 - Data regarding declaring the issue (additional issue) of securities frustrated or invalid;
 - Data regarding inclusion of a shareholder holding less than 5 percent of the issuer's ordinary shares, into the issuer's shareholders register, as well as which resulted in the ownership interest of such a shareholder becoming more or less than 5, 10, 15, 20, 25, 30, 50 or 75 percent of the ordinary shares placed;
 - Data regarding the record date (as for the issuer's shareholders);
 - Data regarding the timeframe for fulfillment of the issuer's obligations to the issuer's security holders;
 - Data regarding decisions made at general meetings;
 - Data regarding the accrued and/or paid yield on the issuer's securities;

¹ Where it is provided by the RF legislation of joint-stock companies, the annual report should include a section containing a detailed analysis of the status of the Company net assets.

- Data regarding the received voluntary or mandatory offer (including the competitive offer) in accordance with Chapter XI.1 of the Federal Law ‘On joint-stock companies’;
- Data regarding the received notification of the right to demand for repurchasing the securities or of the demand for repurchase of the securities provided by the person who has purchased over 95 percent of the total number of ordinary and preferred shares;
- Also any other data determined by the Russian Securities Market Regulator* in accordance with the Russian Federation legislation on the securities market
- Data that may have material effect on the value of the Corporation securities, the list of which is established by the effective regulations of the FFMS, specifically:
 - Information regarding the decisions made by the Board of Directors:
 - a) On calling the general shareholders meetings, including approval of the agenda;
 - b) on election of the President and/or the Board;
 - c) on early termination of powers of the President and/or the Board members;
 - d) of suspension of powers of the President, including the same of the managing company or the Managing Director;
 - e) on recommendations regarding the size of the share dividend on shares paid and the procedure of its payment;
 - f) on recommendations with regard to voluntary or mandatory offer received, including evaluation of the recommended price of the securities being purchased and the potential change of their market price after the purchase, evaluation of the plans of the person who provided voluntary or mandatory offer with regard to his employees;
 - g) on bringing for the issue of the Corporation reorganization and the procedure and terms for such reorganization for consideration of the general shareholders meeting;
 - h) on approval of a major deal;
 - i) on approval of the Corporation Registrar and the terms of the agreement with him;
 - j) on termination of the agreement with the Corporation Registrar;
 - k) on buying out by the joint-stock company of the shares, bonds and other securities issued by the company;
 - l) on the establishing (liquidation) of the branches and/or the opening (closure) of the representation offices of the Corporation;
 - On expiration of term of office of the President and/or the Management Board members;
 - On change of the ownership interest of the individuals being the members of the Corporation management bodies in the Corporation and its subsidiaries and affiliated companies;
 - On making a non-arm’s length transaction, if the price of such transaction is 5 or more percent of the book value of the Corporation assets;
 - On initiation of bankruptcy proceedings and/or implementation by the arbitration tribunal against the Corporation and/or its subsidiaries and affiliated companies;
 - On entering a listing agreement with the stock exchange;

* The list is provided in accordance with the wording of PROVISION OF INFORMATION DISCLOSURE BY THE EQUITY SECURITY ISSUERS, approved by the Order # 06-117/PZ-N of 10 October 2006, as amended and supplemented in wording of the FFMS Orders # 06-148/PZ-N of 14 December 2006, # 07-44/PZ-N of 12 April 2007, # 07-93/PZ-N of 30 August 2007, # 09-14/PZ-N of 23 April 2009, # 09-17/PZ-N of 2 June 2009)

- On inclusion and exclusion of the Corporation securities in/from the list of the securities admitted for trading by the trade institutor on the securities market;
 - On obtaining an authorized body's permit for placement and/or arranging of the circulation of the joint-stock company's securities outside the Russian Federation;
 - On material mistakes detected in the joint-stock company's financial statements previously published and/or disclosed in any other way;
 - On disclosure of interim or annual reports in accordance with the International Accounting Standards (Generally Accepted Accounting Principles (US GAAP));
 - On presenting an application for making an entry regarding reorganization and/or termination of activity in the Uniform State Register of Legal Entities;
 - On liquidation of a subsidiary or affiliated company;
 - On receipt, suspension, revocation, substitution, prolongation or expiration of the license to carry out the activity being of considerable importance for the issuer;
 - On bringing an action against the Corporation, its subsidiaries and/or affiliated companies, the satisfaction of which may have material impact on the financial status or business activity;
 - On changing the address of the Internet webpage used for information disclosure;
 - On changing the Corporation ownership interest in another business entity;
 - On declaring the general meeting of shareholders frustrated;
 - Also any other data determined by an authorized Russian Securities Market Regulator* in accordance with the Russian Federation legislation on securities market
- The lists of the Corporation affiliated persons;
 - The Charter, amendment thereto, as well as the provisions and regulations governing the activities of the Corporation management bodies: the General Shareholders Meeting, the Board of Directors, the President and the Management Board, as well as the provisions and regulations governing the activities of the committees under the Board of Directors;
 - Data of the Corporate Secretary and the Registrar of the Corporation;
 - Information disclosed in Russian according to the UK legislation requirements for the purpose of providing for equal opportunities of information access for the Russian and international investors.

The Corporation shall disclose the above mentioned information in the scope, procedure, within the timeframe and using the methods established by the effective regulations of the Russian Federation (disclosure in the authorized information agencies' newsfeed; publishing in mass media; placing information at the Corporation website, etc.).

The above mentioned information shall also be placed at the Corporation website in Russian and English at the following addresses:

<http://www.sistema.ru>

<http://www.sistema.com>

* The list is given in accordance with the wording of PROVISION OF INFORMATION DISCLOSURE BY THE EQUITY SECURITY ISSUERS, approved by the Order # 06-117/PZ-N of 10 October 2006, as amended and supplemented in wording of the FFMS Orders # 06-148/PZ-N of 14 December 2006, # 07-44/PZ-N of 12 April 2007, # 07-93/PZ-N of 30 August 2007, # 09-14/PZ-N of 23 April 2009, # 09-17/PZ-N of 2 June 2009)

The data subject to publishing in mass media shall mainly be published in the leading business editions in Russian such as “VEDOMOSTI”, “KOMMERSANT”, “RBK-DAILY” and “Business and Financial Markets”.

The procedure of interaction between the structural subdivisions and executive officers of the Corporation in preparation and disclosure of the respective information, as well as the methods and timeframe for its disclosure shall be provided in the internal regulatory documents of the Corporation (regulations).

3.2. Additional responsibilities of the Corporation with regard to disclosure of its business activities

In addition to the above information the Corporation shall also make the following disclosures:

- General information about the Corporation, its mission, business goals and objectives, principal areas of business;
- organizational structure of the Corporation
- History of establishment and development of the Corporation;
- Press releases being published by the Corporation;
- Description of the effective development strategy of the Corporation
- information about the major subsidiaries and affiliated companies of the Corporation specifying their names, types of business and the ownership interest of the Corporation;
- Audited consolidated financial statements made in accordance with the International Accounting Standards (US GAAP);
- Information about the business efficiency indicators of the Corporation;
- Information about the principles of the related parties' transactions;
- Information about the Auditor of the Corporation and the structure of the Auditor's services;
- Information about the markets of presence of the Corporation;
- Information of credit ratings and corporate governance ratings;
- Information of the Corporation securities and their current quotations;
- The Corporate Code of Conduct, the Code of Ethics, the Information Policy, the Corporate Social Responsibility Policy, the Dividend Policy, the Regulation on the Internal Control and Audit Function, the Regulation on the bonuses and compensations paid to the members of the Board of Directors;
- Information about the shareholders holding two and more percent of the Corporation shares;
- Calendar of the events of importance for the investment community;
- Detailed information about the members of the Board of Directors, the President and the members of the Management Board of the Corporation;
- Information about the composition, objectives and powers of the committees under the Board of Directors;
- Information about the procedures and results of the activities of the Board of Directors and the General Shareholders Meeting;
- Information about the structure and procedure for determining remuneration of the members of the Board of Directors and Management;
- Social report and information about the corporate social responsibility strategy of the Corporation.

The basic method of the above disclosure shall be disclosure at the Corporation websites:

<http://www.sistema.ru>

3.3.Submittal of the Corporation's documents on demand of shareholders and other interested parties

In accordance with the Federal Law of the Russian Federation "On joint-stock companies", the Corporation shall provide its shareholders with the access to the following Corporation documents:

- The Corporation's Charter, the amendments made to the Corporation's Charter and registered according to the established procedure, the Certificate of State Registration of the Corporation;
- Documents that confirm the rights of the Corporation to the property registered on its balance sheet;
- Internal documents of the Corporation, including but not limited to the: Regulations on the management bodies;
- Regulations on the branch (branches) or representative office(s) of the Corporation;
- Annual reports;
- Accounting documents;
- Documents of financial statements;
- Minutes of the General Meetings of Shareholders, the meetings of the Board of Directors of the Corporation, the Audit Commission, the Management Board;
- Voting ballots and also powers of attorney (copies of powers of attorney) for participation in the General Meeting of Shareholders;
- Independent appraisers' reports;
- Lists of the Corporation's affiliated persons;
- Lists of those persons who have the right to participate in the general meeting of the shareholders entitled to dividends, as well as any other lists made by the Corporation to enable the shareholders to exercise their rights in accordance with the requirements of the Federal Law "On joint-stock companies";
- Findings and opinions of the Corporation's Audit Commission, the Auditor and the public and municipal financial supervisory bodies;
- Prospectuses, quarterly reports of the Corporation and any other documents that contain the information subject to publication or other disclosure in accordance with the Federal Law "On joint-stock companies" and other federal laws;
- Notices of entering into the shareholders' agreements forwarded to the company, as well as the lists of the persons who have entered into such agreements;

The responsibility for custody of the Corporation's documents shall lie with the President of the Corporation. The access of the interested parties to the information and documents of the Corporation shall be provided by the Secretary of the Corporation.

The Corporation's shareholders and the authorized persons of government bodies shall have the right to get access to the Corporation's documents within the scope of powers given to them by the legislation of the Russian Federation. The shareholders holding aggregately at least 25% of the Corporation's voting shares shall have the right of access to the accounting documents and minutes of the Management Board meetings. Judicial, law enforcement and tax authorities may obtain the information about the Corporation which is required for conducting their operations in accordance with the legislation of the Russian Federation.

The documents for information shall be provided upon the request prepared in any form and addressed to the President or the Corporate Secretary of the Corporation. The following shall have to be specified in the request: full name of the applicant (for legal entities – name and location), the

number and category (type) of the Corporation shares held by the applicant and the title of the document requested. If the rights to the shares held by the shareholder applying for the documents are registered with a nominal holder, such shareholder shall have to submit a statement from his or her depository account as of the date which is not more than 3 business days ahead of the date on which the request for information was sent. The request for information related to the accounting documents shall have to contain obligations on non-disclosure of the confidential information contained therein.

The Corporate Secretary of the Corporation shall arrange for submission of the requested documents for examination after verifying the fact that the applicant holds the shares of the Corporation. The documents requested for information shall have to be submitted within 7 business days upon receipt of the respective inquiry by the Corporation at the address of the executive office: Building 1, 13 MOKHOVAYA St, Moscow 125009, in the presence of the Corporate Secretary. The shareholder is entitled to request the Corporation to provide him or her with the copies of the Corporation's documents. The copies shall be submitted to the shareholders against signature or sent by registered mail within at least 10 business days upon filing of the written request by the shareholder. A fee may be charged for making the copies of the requested documents which shall not exceed the cost of making them. In case of deciding to charge a fee on making the copies, the Corporation shall provide the shareholder with the information on the amount and details of the account, to which it is necessary to transfer funds in payment for making the requested copies.

The copies of the Corporation's documents shall be submitted to the applicant (shareholder) in person or to his or her representative upon presentation of the power of attorney (or any other documents that confirm the representative's powers) under the transfer and acceptance deed in the premises located at the address of the Corporation's executive office.

The Corporation is entitled to deny the applicant provision of the Corporation's documents in the following cases:

- If the applicant is not the Corporation's shareholder as of the date of making a request;
- If the applicant has not confirmed his or her powers;
- If the applicant requests the information not included in the list of the Corporation's documents subject to presentation to shareholders;
- If the request for documents sent to the Corporation does not contain all the data provided for by this Policy.

The written denial shall be sent to the applicant by registered mail not later than 7 days upon receipt of the request for information by the Corporation.

3.4. Organization of information support in implementation of corporate procedures

When implementing the corporate procedures which require establishment of legally regulated exchange of information between the Corporation and its shareholders, security holders, or any other interested parties, the Corporation shall strictly comply with the terms, forms, regulations, methods and procedures set out by the applicable legislation and/or the internal documents of the Corporation. The following can serve as the examples of such procedures, including but not limited to:

- Holding the general meeting of shareholders;
- Issue of securities;
- Buyout of the Corporation's securities, making a securities buyout offer to shareholders;
- Reorganization of the Corporation.

4. DISCLOSURE OF INFORMATION IN ACCORDANCE WITH THE REQUIREMENTS OF THE UK SECURITIES REGULATORS

In accordance with the UK Securities Regulators' requirements, the Corporation shall disclose publicly the following information:

- Annual Financial Report of the Corporation which includes the audited consolidated financial statements according to US GAAP international standards, the management report, as well as the report with guarantees of fairness of the information disclosed;
- List of the Corporation's reports and press releases for the year which includes the list of all the information messages, press releases, etc. published by the Corporation on the territory of the Russian Federation and the countries of the European economic area for the 12 months preceding to publication of such a list;
- Material nonpublic (insider) information of the Corporation, as soon as it is available, including the information, which has a positive or negative impact on the Corporation's assets and liabilities, actual or expected results of its activities, its financial status or business;
- Data on the transactions with the Corporation's securities made by the members of the Board of Directors, the President, the Management Board members and those executive officers of the Corporation who have management powers;
- Data on reduction of the number of the Corporation's global depository receipts in free float to the level below 25% of the initial public offering volume;
- Data on changing the Corporation's Depository;
- Data on receiving proposals for making amendments to the Corporation's Charter;
- Data on the decisions made at the general meetings of shareholders of the Corporation;
- Data on the documents forwarded to the shareholders and holders of the global depository receipts of the Corporation, including the notices of calling and holding the general meetings of shareholders;
- Data on the new issues of equity securities, on any public offerings of securities and on the Corporation's listings on the organized trading floors;
- Data on purchasing its own shares or other securities by the Corporation in accordance with the Employee Stock Option Plans;
- Data on any changes in the volume of the rights granted by the shares or global depository receipts of the Corporation;
- Data on the results of any new public offerings;
- Data on receiving a demand (ruling) of stock exchanges, securities regulators or any other authorized persons and entities for suspension or termination of the Corporation's listing;
- Data on filing a petition for admitting the Corporation's securities to listing or resuming the previously suspended listing;
- Data on buyout /redemption of its own shares and/or global depository receipts by the Corporation.

The Corporation shall disclose the above information in the volumes, according to the procedure, within the periods and by the methods established by the UK Securities Regulators' requirements. The information shall be disclosed in the form of a press release in English containing all the information required by the British law. The abovementioned press release shall be forwarded to the authorized information agency (Regulated Information Service) and published on the Corporation's website in Russian and English. Besides, the respective notices and documents in English shall be forwarded to the British Financial Services Authority.

The information specified above shall also be provided in Russian and English on the following websites of the Corporation:

<http://www.sistema.ru>

<http://www.sistema.com>

The procedure for interaction between the structural subdivisions and executive officers of the Corporation during preparation and disclosure of respective information, as well as the methods and terms/periods of its disclosure, shall be fixed in the internal regulatory documents of the Corporation.

5. SYNCHRONIZATION OF INFORMATION DISCLOSURE IN THE UNITED KINGDOM AND THE RUSSIAN FEDERATION

In cases of disclosing information abroad, in accordance with the UK (or any other states, if applicable) Securities Regulators' requirements, the Corporation shall disclose it in the Russian Federation in the volume, according to the procedure, within the periods and by the methods provided by the FFMS of Russia in the Regulation "On information disclosure by equity security issuers".

If the information to be disclosed is not subject to mandatory information disclosure in accordance with the Provision of the FFMS of Russia "On information disclosure by equity security issuers", it shall be disclosed in the form of a press release in Russian at the Corporation's website. If the aforesaid information is subject to mandatory information disclosure in accordance with the Regulation of the FFMS of Russia "On information disclosure by equity security issuers", it shall be disclosed in the volume, according to the procedure, within the periods and by the methods established by the current legally enforceable regulations of the Russian Federation and also in the form of a press release in Russian on the Corporation's website.

In cases of disclosing information in Russia, in accordance with the requirements of the Russian law and/or the Russian Securities Regulators, the Corporation shall identify the information that meets the criteria of 'material nonpublic (insider) information' established by the UK Financial Services Authority and disclose it in the United Kingdom in the volume, according to the procedure, within the periods and by the methods provided for by the rules of the UK Financial Services Authority.

The procedure of interaction between the structural subdivisions and executive officers of the Corporation during preparation and disclosure of respective information, as well as the methods and terms/periods of its disclosure, shall be fixed in the internal regulatory documents of the Corporation.

6. CONFIDENTIAL INFORMATION AND MATERIAL NONPUBLIC (INSIDER) INFORMATION

6.1. Confidential information

Information shall be considered as the Corporation's official or commercial secret and deemed confidential in case it has actual or potential commercial value by virtue of it being unknown to third parties, there is no free access to such information on the legitimate grounds, and the Corporation takes measures to protect its confidentiality and to maintain the nondisclosure regime.

The President of the Corporation shall determine the list of documents and information on the Corporation's activities that are confidential, the procedure for third parties to gain access to such documents and information, the measures to protect confidential information, and the sanctions imposed for its unauthorized disclosure or use.

Confidential information may be conveyed to employees of the Corporation in the volume required for them to perform their job responsibilities, to the Corporation's counterparts under the condition that the relevant confidentiality agreements are executed with them and in the volume required for them to fulfill their contractual obligations, and to public authorities in the cases and in the volume as required by the law. Confidential information cannot be conveyed to and used by any of the employees of the Corporation for any other purposes.

Confidential information shall be publicly disclosed by the Corporation by the decision of the management bodies of the Corporation or its authorized executive officers in accordance with this Policy. After the public disclosure the aforesaid information shall lose its confidentiality status.

Persons that have illegitimately received and/or used confidential information (including by disclosure or distribution unauthorized by the Corporation) shall be obliged to compensate the losses incurred to the Corporation and may be brought to responsibility under the applicable law and internal documents of the Corporation.

6.2. Material nonpublic (insider) information

Material nonpublic (insider) information shall denote fact-based data that are not publicly available, being true by its nature, that are directly or indirectly related to the Corporation or its subsidiaries and affiliated companies, including to their business activity, financial results, business, strategy, material acquisitions, credit and borrower's liabilities, changes in the capital structure or in the cost of securities and/or transactions with them, that, if publicly disclosed, would probably produce substantial influence on the market value of the Corporation's securities and/or associated investments and would be taken into consideration by a reasonable investor while making the decision on investment of capital, thus having an impact on such a decision.

Material nonpublic (insider) information may also include data on the new major business lines or achievements of the Corporation or its subsidiaries and affiliates that are not in open access, or on changes of any information on the Corporation or its subsidiaries and affiliates that was previously disclosed.

Material nonpublic (insider) information shall be disclosed publicly by the Corporation without any undue delay, as it appears, by the decision of the management bodies and authorized executive officers of the Corporation, with regard to the requirements of the applicable law and the rules of the security markets regulators.

6.3. Regulation of material nonpublic (insider) and/or confidential information usage

The Corporation shall provide for the protection of its material nonpublic (insider) and confidential information, including by restriction of access to such information, reflection of the restrictions to its distribution, disclosure or use in the employment contracts concluded with the employees of the Corporation, in civil law contracts and economic agreements concluded with the counterparts of the Corporation, in confidentiality agreements, and by other means.

The circle of persons having access to material nonpublic (insider) and/or confidential information shall be limited to the members of the management bodies and the executive officers of the Corporation who need it to perform their official or professional responsibilities (on the need-to-know basis).

External consultants and any other persons can only be allowed to access material nonpublic (insider) and/or confidential information of the Corporation to perform their professional responsibilities in case there is a confidentiality agreement executed.

It shall be strictly prohibited to the members of the management bodies, the employees and other persons who have continuous or periodic access to material nonpublic (insider) or confidential information to distribute, disclose or use such information by any way beyond the proper and faithful discharge of their official or professional duties.

Any interested person can inform the Corporation about the fact of the illegitimate distribution, disclosure or use of its material nonpublic (insider) or confidential information. The infringers may be subject to criminal, administrative and/or disciplinary liability in line with the procedures established in the applicable law and internal documents of the Corporation.

6.4. Prohibition of insider dealing

It is illegal to perform transactions with the securities of the Corporation on the basis of material nonpublic (insider) information, therefore it is prohibited to the members of the management bodies and the employees of the Corporation, as well as to any other persons included in the insider list, to:

- make transactions with the securities of the Corporation or its subsidiaries and affiliated companies based on the material nonpublic (insider) information about them, or to use such information for their own benefit;
- give any recommendations or advice to other persons and entities on transactions with the securities of the Corporation or its subsidiaries and affiliated companies based on the material nonpublic (insider) information about them;
- make transactions with the securities of any other companies (including the counterparts of the Corporation), if material nonpublic (insider) information about them becomes available in the course of discharge of official duties within the Corporation or its subsidiaries and affiliated companies.

Transactions with the securities of the Corporation made upon instructions, recommendations or advice of a person included in the list of the Corporation's insiders, performed by any other person or organization, can be treated as transactions directly performed by such a person included in the insider list.

6.5. Blackout period on transactions with the securities of the Corporation

In line with the best practice in corporate governance, the Corporation shall impose a periodic blackout on transactions with the securities of the Corporation for the members of the management bodies and the employees.

- Annual Blackout period:
Commencement: 60 (sixty) calendar days immediately preceding the date of publishing the annual financial report of the business results of the Corporation;
Expiration: 48 (forty eight) hours after the date of publishing the annual financial report of the business results of the Corporation.
- Quarterly Blackout period:
Commencement: 30 (sixty) calendar days immediately preceding the date of publishing the quarterly financial reports of the business results of the Corporation;
Expiration: 48 (forty eight) hours after the date of publishing the quarterly financial report of the business results of the Corporation.

The Corporation shall notify the members of the management bodies and the employees of the commencement of the blackout period.

6.6. Prior permissions for making transactions with the securities of the Corporation

The members of the management bodies and the employees of the Corporation shall have the transactions with the securities of the Corporation performed by themselves (or by their affiliated persons or relatives) preliminarily agreed upon with the Chairman or an authorized member of the Board of Directors, or with the Corporate Secretary of the Corporation.

6.7. Notifications of the transactions with the securities of the Corporation

Members of the management bodies and executive officers of the Corporation, duly vested with managerial authority, shall be obliged to inform the Corporate Secretary of the Corporation about the fact of transactions with the securities of the Corporation made by themselves (or by their affiliated persons and relatives) within four business days after the date of making such a transaction.

The Corporation shall inform the UK Financial Services Authority about the transactions made by the members of the management bodies and the executive officers of the Corporation (or by their affiliated persons and relatives) with the securities of the Corporation by means of forwarding the notifications to the authorized information agency – the UK Regulated Information Service.

6.8. Maintenance of the insider list

The Corporation shall maintain and from time to time update the list of all members of the management bodies, employees, counterparts, shareholders who hold over 20% of the Corporation's shares and any other persons who have continuous or periodic access to the material nonpublic (insider) information that is directly or indirectly related to the Corporation.

The persons included in the insider list shall be notified of their key rights and duties related to the access to material nonpublic (insider) information about the Corporation, as well as of the sanctions for its illegitimate distribution, disclosure or use.

The Corporation shall be obliged to submit its insider list to the UK Financial Services Authority on demand.

6.9. Disclosure of material nonpublic (insider) information

Material nonpublic (insider) information of the negative or the positive nature must be disclosed without any undue delay as soon as it becomes known to the Corporation, except in a limited number of cases listed below.

In exceptional circumstances, where the Corporation faces an unforeseen and material event, or if the decision made by any management body of the Corporation requires approval by any other management body, or if the disclosure of the information can affect the natural course of the negotiations held by the Corporation, and in other similar situations, a delay of material nonpublic (insider) information disclosure shall be allowed, provided that:

- such delay is not misleading for any third parties;
- any persons and organizations that have the respective material nonpublic (insider) information of the Corporation at their disposal at this point in time are bound with obligations of confidentiality;
- the Corporation is able to ensure confidentiality of such information.

If any speculations or rumors, that are true enough in matter, appear in the securities market or in mass media, and if the information being the basis for such speculations and rumors is material nonpublic (insider) information, the Corporation must no longer postpone the public disclosure of such information as it is no longer able to ensure its confidentiality.

6.10. Legal restrictions to the disclosure of material nonpublic (insider) information

By virtue of the law of the Russian Federation, the following data shall not be subject to disclosure and, therefore, cannot be qualified as material nonpublic (insider) information for the purposes of public disclosure:

- data that is imperatively referred to personal data of a natural person by the law of the Russian Federation, including their full surname, first name, patronymic, date and place of birth, address, marital, social and property status, education, professional occupation, income and other information (the Federal Law of the RF “On personal data”), except where the aforesaid natural person has given his consent for the above information to be processed and disclosed;
- data that is the secrecy of investigation and proceedings, as well as the data of the persons being protected and the measures of state/public protection performed in accordance with the Federal Law of the Russian Federation “On state protection of victims, witnesses and other participants of criminal proceedings”;
- data of the essence of an invention, a utility or industrial model prior to the official publishing of the information about them;
- data that is classified as state secret and has a special usage regime in accordance with the law of the Russian Federation on state secret.

7. DISCLOSURE COMMITTEE

So that the responsible employees of the Corporation be provided with support in the practical application of this Policy, the Disclosure Committee has been created within the Corporation. The key functions of the Committee shall be as follows:

- assessment of information (including assessment as to its materiality) so that the duties of the Corporation in terms of disclosure be timely defined, and so that such disclosure be performed in line with the requirements set out in the applicable law.
- if necessary, approval of internal documents, draft reports, press releases, plans of participation in conferences in which the Corporation plans to participate, so that to ensure that all the provisions of this Policy are observed.
- fulfillment of any other assignments in the field of information disclosure that may be given to the Committee by the Board of Directors, the Management Board or the President.

To discharge its duties, the Disclosure Committee shall meet as required. The Disclosure Committee members shall be appointed by the President of the Corporation. The employees of the Corporation shall be informed on the list of persons included in the Disclosure Committee.

8. DISCLOSURE OF ANNUAL AND QUARTERLY FINANCIAL RESULTS AND CONFERENCE CALLS

After the end of each quarter (year), the Corporation shall publish a press release that contains a report of the results for the respective quarter (year), as well as the comparative analysis of the indicators for the previous periods. The report of the results for the reporting period (quarter, year) shall include a description of the core events that took place in the reporting period, the financial and the operating data of the Corporation for the reporting period, and the analysis of the results achieved. The aforesaid press release shall be placed at the website of the Corporation.

Immediately after the disclosure of the quarterly and the annual financial results, the Corporation shall, via conference communication facilities or via an Internet conference, present its results over the reporting period. Such a conference call or an Internet conference shall, as a rule, be held in the form of a prepared statement by a representative of the Corporation appointed by the President on the core events that took place over the reporting period, the financial and the operating data of the Corporation for the reporting period, the analysis of the indicators achieved and the risk and

uncertainty analysis; after that time shall be provided to answer the questions of the conference call or the Internet conference participants.

The Corporation shall notify all the interested parties in the form of a press release and publish the information on such a conference call on the website of the Corporation no later than two business days in advance of the conference call. The message shall also contain instructions regarding access to the conference session.

Analysts, shareholders, mass media representatives and other interested parties shall be allowed to participate in the conference calls. Although all the interested parties shall be permitted to attend the conference calls, the Corporation shall reserve the right restrict questions to dedicated time frames and accept questions only from analysts or other persons chosen by the Corporation.

If necessary, the Corporation can also perform a disclosure and conduct a conference call on the projected financial results or the business results of the Corporation before the quarterly financial statements are ready. Such a conference call can also be held regarding other major events related to the activities of the Corporation.

The decision on the feasibility of conducting such a conference call and on the character of information to be presented during the call shall be taken by the Disclosure Committee on the case by case basis dependent on the specific circumstances.

The Corporation shall publish its Annual Report on the results of the year for the investment community; such a report shall inter alia include the information on the core events that took place in the reporting year, the financial and operating indicators of the Corporation and its core subsidiaries, the analysis of the achieved indicators, the analysis of risk and uncertainty factors, the description of the assets structure, and the description of the corporate governance system.

9. RELATIONS WITH PROFESSIONAL PARTICIPANTS OF THE SECURITIES MARKET, SUBMISSION OF INFORMATION ON DEMAND OF ANALYSTS, SHAREHOLDERS AND OTHER INTERESTED PARTIES. PARTICIPATION IN CONFERENCES AND ROAD SHOWS FOR INVESTORS

The Corporation shall strive to maintain an ongoing direct dialogue with the professional participants of the securities market, the shareholders and other interested parties, and shall be prepared to provide additional explanations regarding the data on the Corporation that was previously publicly disclosed on demand of the analysts, the shareholders and other interested parties.

The Corporation shall also be prepared to participate in conferences and road shows for investors to form a true and complete picture of the development of the Corporation within the investment community.

The circle of the employees of the Corporation having the right to provide additional explanations regarding the data on the Corporation, and to participate in conferences and road shows for investors shall be limited and shall include the President, the Senior Vice President - Head of the Finance and Investment Function, the First Vice President - Head of the Strategy and Development Function, the Head of Corporate Communication Function and persons authorized by them.

In the course of communicating with the professional participants of the market, the shareholders and other interested parties in the form of correspondence, telephoning, personal meetings or participation in conferences and road shows, the authorized employees of the Corporation shall not disclose the data that constitutes material nonpublic information, confidential information, personal data of

natural persons, data being the secrecy of investigation and proceedings, data of the essence of an invention, a utility or industrial model before the information on them is officially published, as well as data classified as state secret.

In the course of communicating with the professional participants of the market, the shareholders and other interested parties, the representatives of the Corporation may, for example, present the information for the past periods in the systematized form to illustrate the trends in the business of the Corporation and the industry in general. The representatives of the Corporation can present nonmaterial reference information to help the professional participants of the market or the shareholders to get a more integral picture of the Corporation.

As requested by the professional participants of the market or the shareholders, an authorized employee of the Corporation can review the draft model or report prepared by such analysts. However, in accordance with this Policy, the Corporation shall not comment on such drafts, as well as on any statements and conclusions of such analysts regarding the Corporation, except when needed to correct factual errors related to the information which is already public. Besides, the employees of the Corporation shall not allow for being quoted in the analyst reports. As a rule, the Corporation does not provide copies of analyst reports to its shareholders or any other parties. It is only by the decision of the Disclosure Committee that any exceptions from this rule can be allowed. In such a case it shall be ensured that the Corporation presents the full range of opinions from a broad spectrum of analysts, and that all the waivers regarding the contents of the analyst reports are made.

As a rule, the Corporation shall allow the professional participants of the market and the shareholders to visit the office of the Corporation in case of necessity and by prior arrangement only. It shall however be correspondence and conferences and road shows participation that shall remain the core types of communication with the professional participants of the market, the shareholders and other interested parties.

10. RELATIONS WITH THE PRESS, PARTICIPATION IN EXHIBITIONS, CONFERENCES AND OTHER PR EVENTS

The Corporation shall strive to maintain the ongoing direct dialogue with the press representatives, participate in conferences and other events focused on improving relations with the public so that a realistic picture of the Corporation's activities be formed and the image of the Corporation be maintained.

For this purpose, the responsible employees of the Corporation shall prepare and provide materials that highlight the material events in the life of the Corporation as they take place, publish press releases, and comment the events related to the activities of the Corporation in case there is no contradiction to this Policy.

The circle of the employees of the Corporation who have the right to provide materials and comments to mass media shall be limited and shall include the President, the Head of the Corporate Communication Function and the persons authorized by them.

The members of the management bodies and the employees of the Corporation shall not participate in discussions, make forecasts or comment, including in mass media and in the Internet, on the data that is directly or indirectly related to the economic activities, financial results, business, strategy, transactions, material acquisitions, loan obligations and borrowers' liabilities, changes in the capital structure or in the cost of securities of the Corporation or its subsidiaries and affiliated companies, as well as on the actual or the expected results of their business, without a preliminary approval from the President or the Corporate Communications Function.

In any case, in the course of communication with the mass media representatives, the authorized employees of the Corporation shall not disclose the data that constitutes material nonpublic information, confidential information, personal data of natural persons, data which is the secrecy of investigation and proceedings, data of the essence of invention, a utility or industrial model before the information on them is officially published, as well as data classified as state secret.

In the absence of the decision to the contrary made by the Disclosure Committee, the Corporation shall not disclose material nonpublic information to individual representatives of the press before publishing the press release or any other statement addressed to a broad circle. The Corporation shall however reserve the right to disclose material information to individual representatives of the press that have given their consent (verbal or written) to observe the confidentiality of such information when drafting their articles until the information is published. It is also admissible to disclose material information to the print media that are able to provide for the information to be broadly disseminated.

11. PERSONS RESPONSIBLE FOR INFORMATION DISCLOSURE

The responsibility for the disclosure of the information of the Corporation's activities shall be assigned to the sole executive body (the President). His decisions shall determine the procedures for the interaction between the structural units and the responsible executives of the Corporation when preparing and publicly disclosing the respective information, informing the shareholders and the investors.

The responsibility for the arrangement of the disclosure in line with the requirements of the current laws of the Russian Federation and for the submission of documents and information to the shareholders and the securities market regulators in Russia shall be assigned to the Corporate Secretary of the Corporation.

The responsibility for the arrangement of the disclosure in line with the requirements of the UK securities market regulators, the interaction with the investment community and the mass media in Russia and abroad shall be assigned to the Head of the Corporate Communications Function.

12. CONTROL OVER IMPLEMENTATION OF THE INFORMATION POLICY ADOPTED BY THE CORPORATION

The control over implementation of the information policy adopted by the Corporation, including timely public disclosure of the respective information; disclosure and/or presentation of information in the course of implementation of the corporate procedures and on the shareholders' request; compliance with the requirements and rules with regard to the material nonpublic (insider) information; and compliance with the information policy principles with regard to the securities market players, analysts and the press – shall be the responsibility of the Corporate Conduct Committee under the Board of Directors, the Audit Commission and the oversight bodies of the Corporation.

Efficiency of the information policy implementation shall be assessed by the Board of Directors of Sistema JSFC based on censures of the Russian and UK securities market regulators or absence of such, results of the internal audits, results of the reputational audit of the Corporation, internal and external ratings of transparency and ratings of corporate governance.

13. RESPONSIBILITY FOR FAILURE TO EXECUTE (IMPROPER EXECUTION) OF THE POLICY

Members of the management bodies and the employees of all structural subdivisions of the Corporation shall be obliged to comply with the requirements and instructions of this Information Policy and bear responsibility for non-fulfillment or improper fulfillment of such requirements.

Responsibility for breaching the requirements of this Information Policy shall be established according to the procedure provided in the legislation of the Russian Federation and in certain cases – by the legislation and the rules of the Securities Market Regulators of the United Kingdom, as well as by the Charter and other internal documents of the Corporation, labor and other contracts concluded with the members of the management bodies and employees of the Corporation.

Breaching the requirements and instructions of the Policy can be qualified as violation of the laws and other regulatory documents of the Russian Federation and/or the United Kingdom which provide for sanctions with regard to the violators in the form of compensation for loss, fines and/or imprisonment and may be applied to the members of the management bodies and employees of the Corporation, as well as to their relatives, affiliated persons and the persons included in the insiders list of the Corporation.

14. FINAL PROVISIONS

This Information Policy shall be approved by the Board of Directors of the Corporation and subject to regular revisions to ensure its compliance with the legislation requirements, corporate governance best practices and specifics of the Corporation business.

If the changes in the Russian Federation legislation or in the requirements of the Russian or UK Securities Market Regulators' result in certain provisions of the Policy coming into conflict with them, such provisions shall become invalid and until the Policy is amended the Corporation shall follow the effective provisions of the applicable law and/or the requirements of the Securities Market Regulators.