

# Insider information

## Insider information protection policy

In accordance with the Federal Law “On Combating Illegal Use of Insider Information and Market Manipulation and on Amendments to Certain Legislative Acts of the Russian Federation,” Bank Vozrozhdenie has approved a list of types of insider information, the procedure for gaining access to insider information, confidentiality rules and order of control over compliance with the requirements of the current legislation of the Russian Federation on combating illegal use of insider information and market manipulation.

The Bank also maintains a list of insiders and has an appointed executive, whose responsibility includes monitoring compliance with the requirements of the insider law and the regulations adopted in accordance with it.

In 2012, the Bank continued to develop its system of management of insider information and its non-proliferation. In particular, in October 2012, the Bank’s Management Board approved the Order of compilation and disclosure of the list of insiders, as well as compilation and disclosure of the Bank’s list of insider information, determining the procedure for interaction between departments of the bank to maintain and disclose the list of insiders and informing persons on their inclusion in (or exclusion from) the list of insiders and their responsibilities, as well as storage of documents related to the implementation of these functions.

More information on the list of insider information and how to access this information is available on the Bank’s official website.

## Deals with interested parties

In accordance with the decision made by the Annual General Meeting of Shareholders on June 29, 2012, the Bank has concluded certain transactions (loan issuance, guarantees, deposits, and other operations) in respect of which members of the Board of Directors and the Bank’s executive bodies are deemed to be interested parties in accordance with the Russian Federal Law on Joint-Stock Companies.

The above-mentioned transactions were concluded during ordinary business activities. The essential terms of such deals did not differ from the standard terms of similar deals.

In 2012, the Bank concluded 219 interested-party transactions totaling RUB 13,777.3 million, including:

- loans granting — RUB 636.1 million;
- interbank loans granting/receipt — RUB 11.618 billion;
- raising funds in deposits — RUB 471.6 million;
- securities transactions — RUB 16.7 million;
- other transactions — RUB 1,034.9 million.

All transactions were conducted on market terms.

In accordance with the resolution of the General Meeting of Shareholders, the amount of each transaction (a series of related transactions) concluded by the Bank with each of the interested parties did not exceed the limit of RUB 7 billion; the amount of each interested-party transaction bearing credit risk did not exceed the limit of RUB 2.5 billion; and the sum of several interrelated deals with each interested party did not exceed the limit of RUB 5 billion.

### **Information on large transactions**

During 2012, Bank Vozrozhdenie did not carry out any large transactions (as defined by Article 78 of the Federal Law No. 208 “On Joint Stock Companies”).