

### UC RUSAL IPJSC INSIDER INFORMATION LIST

The insider information of UC RUSAL IPJSC (hereinafter, **the 'Issuer'**) will include the following information:

1. Information on convening and holding the General Meeting of the Issuer's Shareholders, declaring the General Meeting of the Issuer's Shareholders void, as well as on resolutions passed by the General Meeting of the Issuer's Shareholders or the person holding all voting shares of the Issuer;
2. Information on holding a meeting of the Issuer's Board of Directors and its agenda, as well as on certain resolutions passed by the Issuer's Board of Directors:
  - 2.1. On the proposal to the General Meeting of the Issuer's Shareholders to set a date in the resolution on payment (declaration) of dividends;
  - 2.2. On placement or sale of the Issuer's securities;
  - 2.3. On determination or on the procedure to determine the offering price of shares or securities convertible into the Issuer's shares;
  - 2.4. On the establishment of the Issuer's executive body and on the early termination (suspension) of its powers, including the powers of the management company or manager;
  - 2.5. On the inclusion of candidates in the list of candidates for voting at the Annual General Meeting of the Issuer's Shareholders on electing members of the Issuer's Board of Directors;
  - 2.6. On recommendations regarding the amount of dividends on the Issuer's shares and the procedure for their payment;
  - 2.7. On approval of the Issuer's internal documents;
  - 2.8. On consent to enter into or subsequent approval of a transaction (several interrelated transactions) of the Issuer, recognised as a major transaction and/or a related party transaction under the laws of the Russian Federation, as well as any other transaction (several related transactions) amounting to 10 per cent or more of the asset value determined based on the consolidated financial statements (financial statements) of the Issuer, and where the Issuer is not required to prepare and disclose consolidated financial statements (financial statements), based on the Issuer's accounting (financial) statements as of the latest reporting date (the final date of the latest completed reporting period preceding the transaction consent resolution date or the transaction date where a resolution is made to approve it subsequently);
  - 2.9. On delegation of powers of the Issuer's sole executive body to a management company or

manager, on approval of a management company or manager and terms and conditions of an agreement concluded by the Issuer with the management company or manager;

- 2.10. On approval of the registrar maintaining the register of the Issuer's securities holders, terms and conditions of the agreement with it in terms of maintaining the register of the Issuer's securities holders, as well as termination of the agreement with it;
3. Information on adopting a resolution to reorganise or liquidate the entity that provided security for the Issuer's bonds;
4. Information on showing by the Issuer or the entity that provided security for the Issuer's bonds signs of bankruptcy provided for by Federal Law No 127-FZ 'On Insolvency (Bankruptcy)' dated October 26, 2002;
5. Information on acceptance by the arbitration court of an application for recognising the Issuer as insolvent (bankrupt), as well as the adoption by the arbitration court of a decision to recognise the Issuer as insolvent (bankrupt), the introduction of one of the bankruptcy procedures against the Issuer, and the termination of bankruptcy proceedings against the Issuer;
6. Information on the date as of which the persons entitled to exercise the rights under the Issuer's securities are determined (recorded);
7. Information on stages of the Issuer's securities issue procedure;
8. Information on suspension and resumption of the Issuer's securities issue;
9. Information on recognition of the bond program as void, recognition of the issue (additional issue) of the Issuer's securities as void or invalid;
10. Information on redemption of the Issuer's securities;
11. Information on registration of amendments to the resolution on the issue of securities in terms of changes in the scope of rights under securities and/or the face value of securities, including during their consolidation or splitting;
12. Information on adoption of resolution on acquisition (occurrence of grounds for acquisition) by the Issuer of the securities placed by it;
13. Information on accrued (declared) and/or paid income on the Issuer's securities, other payments due to the holders of the Issuer's securities, as well as the intention to perform the obligation to make payments on the Issuer's bonds, the rights to which are recorded in the register of the Issuer's securities holders;
14. Information on the inclusion of the Issuer's securities by the Russian trade organiser in the list of securities admitted to organised trading for the conclusion of purchase contracts, in particular the inclusion of the Issuer's securities in the quotation list, or on the removal of the Issuer's securities from the list of securities admitted to organised trading for the conclusion of purchase contracts, including on the removal of the Issuer's securities from the quotation list, as well as on the transfer of the Issuer's

securities from one quotation list to another quotation list (on the removal of the Issuer's securities from one quotation list and their inclusion in another quotation list);

15. On inclusion of the Issuer's securities (securities of foreign issuers certifying rights in respect of securities of a Russian issuer (hereinafter, the depository securities) in the list of securities admitted to trading in a foreign organised (regulated) financial market, including the inclusion of these securities by a foreign exchange to the quotation list, or on exclusion of the Issuer's securities (depository securities) from the list of securities admitted to trading in a foreign organised (regulated) financial market, including on the exclusion of these securities from the quotation list;
16. Information on non-performance of the Issuer's obligations to the holders of its securities, and on any changes in the total number of bonds which early redemption obligations have not been performed;
17. Information on the acquisition by a person of a right (termination thereof) to dispose of a certain number of votes assigned to the voting shares constituting the Issuer's registered capital;
18. Information on a voluntary, including competing or mandatory offer to purchase the Issuer's securities received by the Issuer in accordance with Chapter XI.1 of Federal Law No 208-FZ 'On Joint-Stock Companies' dated December 26, 1995, as well as on changes made to the offers;
19. Information on the notice received by the Issuer in accordance with Chapter XI.1 of the Federal Law 'On Joint-Stock Companies' of the right to demand redemption of the Issuer's securities or call for redemption of the Issuer's securities;
20. Information on detection of errors in the previously disclosed statements of the Issuer (accounting (financial) statements, consolidated financial statements, financial statements);
21. Information on any transaction performed by the Issuer or an organisation controlled by the Issuer, which is of significant importance for the Issuer, [as determined pursuant to Clause 1.14 of Regulation of the Bank of Russia No 714-P dated March 27, 2020 'On Disclosure of Information by Issuers of Issue-Grade Securities', hereinafter, **Regulation of the Bank of Russia No 714-P** (hereinafter, an organisation controlled by the Issuer, which is of significant importance for the Issuer)], and amounting to 10 per cent or more of the asset value as determined by the Issuer's consolidated financial statements (as determined by the Issuer's financial statements where the transaction is made by the Issuer who is not obliged to prepare and disclose consolidated financial statements, or by the Issuer's accounting (financial) statements where the transaction is made by the Issuer who is not obliged to prepare and disclose financial statements, or by the aggregate accounting (financial) statements (total asset value) of the Issuer and the organisation controlled by the Issuer, which is of significant importance for the Issuer, where the Issuer is not obliged to prepare and disclose consolidated financial statements and the transaction is made by an organisation controlled by the Issuer, which is of significant importance for the Issuer) as of the latest reporting date (the final date of the latest completed reporting period preceding the transaction date);
22. Information on the entry into a transaction by the Issuer or an organisation controlled by the Issuer,

which is of material importance to it, being a non-arm's length transaction subject to disclosure by the Issuer in accordance with Clause 13.9.22 and Chapter 35 of Regulation of the Bank of Russia No 714-P;

23. Information on changes in the composition and/or size of pledged items under the Issuer's collateralised bonds;
24. Information on the Issuer's receipt of a right (termination thereof) to dispose of a certain number of votes attributable to voting shares constituting the registered capital of an organisation whose securities are admitted to organised trading;
25. Information on conclusion of an agreement by the person controlling the Issuer or an organisation controlled by the Issuer that provides for the obligation to purchase the Issuer's securities;
26. Information on the right given to and/or terminated for the Issuer's bond holders to demand the Issuer to early redeem the Issuer's bonds;
27. Information on assigning of a rating to securities and/or their Issuer, as well as on changing the rating by a rating agency under a contract with the Issuer;
28. Information on a dispute related to the Issuer's establishment, management or participation in the Issuer, or any other dispute in which the Issuer is the plaintiff or defendant and the amount of claims is 10 and more percent of the book value of assets determined according to the Issuer's accounting (financial) statements as of the last reporting date (the end date of the last completed reporting period preceding the date when the court accepts the statement of claim for proceedings);
29. Information on placing bonds of a foreign issuer or other financial instruments of a foreign entity obliged under such financial instruments, certifying loan obligations, the performance of which is at the expense of the Issuer, outside the Russian Federation;
30. Information on the decision of the Bank of Russia to release the Issuer from the obligation to disclose information in accordance with Article 30 of Federal Law No 39-FZ 'On the Securities Market' dated April 22, 1996;
31. Information on the acquisition (alienation) of the Issuer's voting shares or depositary securities certifying rights in respect of the Issuer's voting shares by the Issuer or an organisation controlled by the Issuer;
32. Information on holding of the general meeting of the Issuer's bond holders and on its agenda, on resolutions passed by the general meeting of the Issuer's bond holders, as well as on declaring the general meeting of the Issuer's bond holders void;
33. Information on the determination of a representative of the bond holders after the registration of the bond issue by the Issuer of the bonds;
34. Information on the date on which a representative of the bond holders starts to exercise its powers;

35. Information on conclusion by the Issuer of a novation agreement or an accord and satisfaction agreement entailing the termination of obligations under the Issuer's bonds;
36. Information on the right given to the Issuer's convertible securities holders to demand the Issuer to convert the Issuer's convertible securities held by them;
37. Information on the project(s) selected by the Issuer which financing and/or refinancing will require the funds obtained from the bond placement to be currently or further used, which issue (programme) is additionally identified using the 'green bonds', 'social bonds', 'sustainable bonds', 'adaptation bonds' words (hereinafter, respectively, green bonds, social bonds, sustainable bonds, adaptation bonds), where such project(s) is (are) not specified in the resolution to issue green bonds, social bonds, sustainable bonds, adaptation bonds;
38. Information on the conduct and findings of an independent external assessment of whether the issue (programme) of green bonds, social bonds, sustainable bonds, bonds whose issue (programme) is further identified using the 'bonds linked to sustainable development goals' words (hereinafter, the bonds linked to sustainable development goals), adaptation bonds, or the Issuer's policy on the use of funds obtained from the above bond placement, or the project(s) which financing (refinancing) will use the funds obtained from the above bond placement, complies with the principles and standards of financial instruments specified in the resolution on such bond issue;
39. Information on the conduct and findings of an independent external assessment of modifications introduced to the Issuer's policy on the use of funds obtained from the placement of green bonds, social bonds, sustainable bonds, and adaptation bonds;
40. Information on the conduct and findings of an independent external assessment of modifications introduced to the climate transition strategy (if the modifications relate to the Issuer's performance targets and their interim and final values, the internationally recognised climate change scenario that serves as the basis for the development of the Issuer's climate transition strategy, and impact the achievability of the interim and final values of the Issuer's performance targets through the implementation of the Issuer's climate transition strategy) of the Issuer of bonds whose issue (programme) is further identified using the 'climate transition bonds' words (hereinafter, the climate transition bonds);
41. Information on the misuse of funds obtained from the placement of green bonds, bonds whose issue (programme) is further identified using the 'infrastructure bonds' words, social bonds, sustainable bonds, adaptation bonds, and on the consequences of the misuse of the funds, as provided for in the resolution on the bond issue;
42. Information on violation of principles and standards for financial instruments specified in the bond issue resolution during the implementation of a project(s) financed and/or refinanced using funds raised from the placement of green bonds, social bonds, sustainable bonds, and adaptation bonds;
43. Information on the inclusion of green bonds, social bonds, sustainable bonds, and adaptation bonds

into the list of sustainable development financial instruments posted on the dedicated web page of the methodological centre of the State Development Corporation VEB.RF, or into the list of sustainable development financial instruments maintained by the International Capital Market Association (ICMA) or the Climate Bonds Initiative (CBI), and on exclusion of such bonds from the above list;

44. Information on the achievement or failure to achieve interim (if any) or ultimate target values of the key performance indicator(s) of the Bond Issuer specified in the resolution on the issue of bonds linked to sustainable development goals;
45. Information on the achievement or failure to achieve interim or ultimate values of the Climate Transition Bond Issuer's performance targets specified in the Issuer's strategy to transform its activities with a view to transitioning to a low-carbon economy (energy transition), mitigation of climate change and achievement of other goals set out in the Paris Agreement dated December 12, 2015, adopted by Resolution of the Government of the Russian Federation No 1228 'On Adoption of the Paris Agreement' (which entered into force for the Russian Federation on November 6, 2019) dated September 21, 2019;
46. Information on other events (actions) that, in the Issuer's opinion, have a significant impact on the value or quotations of its securities, including other information with respect to the Issuer, its shareholders or officers, its securities admitted to organised trading, or derivatives of financial instruments for these securities, which is not publicly known to persons who usually carry out transactions or are likely to carry out transactions with the Issuer's securities admitted to organised trading, but could, if generally known, significantly affect the price of the Issuer's securities admitted to organised trading.
47. Information constituting the annual consolidated financial statements (financial statements) of the Issuer, interim consolidated financial statements (financial statements) of the Issuer prepared for the reporting period comprising 6 months of the reporting year, as well as information contained in the audit reports prepared in respect of these statements or other document, drawn up based on the results of the audit of interim consolidated financial statements (financial statements) in accordance with the auditing standards;
48. Information contained in the annual reports of the joint-stock company being the Issuer, except for information that has already been disclosed;
49. Information constituting the annual accounting (financial) statements of the Issuer, together with the information contained in the auditor's report prepared in respect of the said statements if the said statements have been audited;
50. Information constituting the interim accounting (financial) statements of the Issuer for the reporting period consisting of 3, 6 or 9 months of the reporting year, together with the information contained in the auditor's reports prepared in respect of the said statements if the said statements have been audited;
51. Information contained in the reports of issuers of the Issuer's issue-grade securities, except for information that has already been disclosed;

52. Information constituting the Issuer's report, consolidated financial statements (financial statements) and accounting (financial) statements prepared for time periods other than those specified in clause 47 and 49–51 hereof, the disclosure of which may have a material impact on the price of the Issuer's securities admitted to organised trading (in whose respect an application for admission to organised trading has been submitted);
53. Information contained in the Issuer's prospectus, except for information that has already been disclosed;
54. Information constituting the terms and conditions of the securities placement defined by the Issuer in a separate document, except for information that has already been disclosed (where there is no securities offering prospectus or there are no terms and conditions for their placement in the securities prospectus);
55. Information on the entry into a contract (transaction) by the Issuer, except for contracts (transactions) provided for in paragraphs 13.9.21, 13.9.22 and 13.9.27 in clause 13.9 of Regulation of the Bank of Russia No 714-P, if entering into such contract (transaction) may have a material impact on the price of the Issuer's securities admitted to organised trading (in whose respect an application for admission to organised trading has been submitted);
56. Information on adoption by the court, arbitration court, Federal Bailiff Service of injunctive remedies (including seizure) in respect of cash or other property owned by the Issuer, an organisation controlling the Issuer, an organisation controlled by the Issuer, which is of significant importance for the Issuer, or providing security for the Issuer's bonds admitted to organised trading (in whose respect an application for admission to organised trading has been submitted) to a person that is not the Russian Federation having provided a state guarantee of the Russian Federation, a constituent entity of the Russian Federation having provided a state guarantee of a constituent entity of the Russian Federation, or a municipal entity having provided a municipal guarantee, constituting 10 or more per cent of the book value of the assets of these persons as of the day of the end of the latest completed reporting period preceding the adoption of injunctive remedies;
57. Information on acquisition by a person of the right or termination of a person's right, directly or indirectly (through persons under its control), independently or jointly with other persons connected with the person by a trust agreement and/or simple partnership agreement, and/or instruction, and/or shareholder's agreement and/or other agreement, which subject matter is the exercise of the rights certified by shares (stakes) of the organisation that has provided suretyship, guarantee or collateral for the Issuer's bonds admitted to organised trading (in whose respect an application for admission to organised trading has been submitted), if the person that has provided such suretyship, guarantee or collateral for such bonds is not the Russian Federation that has provided the state guarantee of the Russian Federation, the constituent entity of the Russian Federation that has provided the state guarantee of the constituent entity of the Russian Federation, or the municipal entity that has provided a municipal guarantee, to dispose of a certain number of votes attributable to voting shares (stakes) constituting its authorised capital stock, if the specified number of votes is 5 per cent or becomes more

or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 per cent of the total number of votes attributed to voting shares (stakes) constituting the authorised capital stock of the specified organisation;

58. Information on the circumstances provided for by the second paragraph of Sub-Clause 23 of Clause 1 of Article 2 of Federal Law No 39-FZ 'On the Securities Market' dated April 22, 1996, which occurrence or non-occurrence may impact the payments, if any, under the Issuer's structured bonds admitted to organised trading (in whose respect an application for admission to organised trading has been submitted) (including payments upon redemption of structured bonds) (hereinafter, the **Circumstances**), indicating the numerical values (parameters, conditions) or the procedure for determining them, as well as the amount of payments under the structured bond (including the amount of payment upon redemption of the structured bond) or the procedure for its determination (where such information is not contained in the structural bond issue resolution);
59. Information on the numerical values (parameters, conditions) of the Circumstances or the procedure for their determination, as well as on the amount of payments under the structured bond (including the amount of payments upon redemption of the structured bond) or the procedure for its determination, where they are established by the Issuer's authorised body before the commencement of the placement of structured bonds in accordance with Sub-Clause 1 and 2 of Clause 3 of Article 27<sup>1-1</sup> of Federal Law No 39-FZ 'On the Securities Market' dated April 22, 1996 (where such information is not contained in the structural bond issue resolution);
60. Information received by the Issuer from the preliminary investigation or inquiry authorities on initiating a criminal case against a person being a member of the Issuer's management bodies, an organisation controlling the Issuer, an organisation controlled by the Issuer, or a person that has provided security for the Issuer's bonds admitted to organised trading (in whose respect an application for admission to organised trading has been submitted);
61. Information contained in the materials on whose basis the Issuer's management bodies, with the exception of the General Meeting of Shareholders, adopt resolutions that may have a significant impact on the price of the Issuer's securities admitted to organised trading (in whose respect an application for admission to organised trading has been submitted), except for the information that has already been disclosed;
62. Information on accidents at hazardous production facilities operated by the Issuer, as defined in accordance with Federal Law No 116-FZ 'On Industrial Safety of Hazardous Production Facilities' dated July 21, 1997, if such information may have a material impact on the price of the Issuer's securities admitted to organised trading (in whose respect an application for admission to organised trading has been submitted).



**Note 1.** Insider information does not include:

- Data made available to an unlimited number of persons, including as a result of their distribution;
- Research, forecasts, and estimates, performed on the basis of publicly available information, on financial instruments, foreign currency and/or goods, as well as recommendations and/or proposals on transactions with financial instruments, foreign currency and/or goods.

**Note 2.** Due to the fact that the provisions of the Federal Law 'On Joint-Stock Companies' on related-party transactions and major transactions, as well as the provisions of the by-laws of the Russian Federation governing the relations arising from the specified federal law, do not apply to the Issuer, the Issuer does not conduct control procedures to identify such transactions and, accordingly, does not disclose information about them (Part 1.1 of Article 4 of Federal Law No 290-FZ 'On International Companies and International Funds' dated August 3, 2018 and Clause 35.3 of the Articles of Association of UC RUSAL IPJSC).

**Note 3.** In case of any amendments to the applicable laws and/or regulations of the Russian Federation and/or Hong Kong after approval of this document, this List will have effect subject to such changed requirements of the laws and/or regulations of the Russian Federation and/or Hong Kong (where applicable).

**Note 4.** This List has been prepared in accordance with Instruction of the Bank of Russia No 6877-U 'On the Insider Information List of of Legal Entities Specified in Clauses 1, 3, 4, 11 and 12 of Article 4 of Federal Law 224-FZ 'On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation' dated July 27, 2010, as well as on the Procedure and Terms of Its Disclosure' dated September 30, 2024 (hereinafter, **the Instruction of the Bank of Russia**) and Regulation of the Bank of Russia No 714-P, and all its provisions will be interpreted in accordance with the Instruction of the Bank of Russia and Regulation of the Bank of Russia No 714-P.