

APPROVED
by Acron's Chief Executive Officer
Order No. 1-1/49 dd. 5 August 2022

List of Acron's Inside Information
(amended)

Moscow 2022

1. Information on the following facts and circumstances is classified as inside information of the securities issuer Public Joint Stock Company Acron (“Company”). This list was approved by a regulatory act of the Central Bank of Russia:

- 1.1. Convening and holding the Company’s general meeting, declaring the Company’s general meeting as failed, and the resolutions passed by the Company’s general meeting;
- 1.2. Holding meetings of the Company’s Board of Directors, agendas and certain resolutions passed:
 - Proposing that the Company’s general meeting determines a certain record date for the persons entitled to dividends in a resolution to pay (declare) dividends;
 - Placing or disposing of the Company’s securities;
 - Determining the offering price or a procedure to determine the offering price for shares or securities convertible in the Company’s shares;
 - Establishing the Company’s executive body and early termination of its powers, including the powers of a managing organisation or a manager;
 - Including nominees to the Company’s Board of Directors to the list to be put on a vote at the Company’s annual general meeting;
 - Recommending on the amount and payment procedure for the dividends on the Company’s shares;
 - Approving the Company’s bylaws;
 - Consenting to execution or further approval of the Company’s transaction (several associated transactions) considered a major and (or) a related-party transaction under the Russian laws or other transaction (several associated transactions), the amount of which totals ten (10) and more per cent of the balance sheet value of the Company’s assets based on the Company’s accounting (financial) statements as of the last reporting date (date of the end of the last complete reporting period determined under Sub-clause 26, Clause 1, Article 2 of the Federal Law *On Securities Market*, which precedes the date of passing the resolution to consent to the transaction or the date of transaction, if a resolution on its further approval is passed);
 - Transferring the powers of the Company’s sole executive body to a managing entity or a manager, approving a managing entity or a manager and terms and conditions of an agreement executed by the Company with a managing entity or a manager;
 - Approving a registrar that keeps the Company’s shareholder register, the terms and conditions of an agreement with the registrar in respect of keeping the Company’s shareholder register and terminating thereof.
- 1.3. Passing a resolution on reorganisation or liquidation of an entity providing security for the Company’s bonds;
- 1.4. The emergence of signs of insolvency (bankruptcy), as provided for by Russian laws on insolvency (bankruptcy), at the Company or an entity providing security for the Company’s bonds;
- 1.5. Acceptance by an Arbitrazh court of an application to recognise the Company as insolvent (bankrupt); the rendering by an Arbitrazh court of a judgement recognising the Company as insolvent (bankrupt); the introduction of one of the bankruptcy procedures in respect of the Company; and termination of bankruptcy proceedings against the Company;
- 1.6. A record date for persons entitled to exercise the rights attached to the Company’s securities;
- 1.7. The stages of the procedure to issue the Company’s securities;
- 1.8. Suspending and resuming the issue of the Company’s securities;
- 1.9. Recognising the bond programme as failed; recognising an issue (an additional issue) of the Company’s securities as failed or invalid;
- 1.10. Cancelling the Company’s securities;
- 1.11. Registering the changes in resolution to issue securities in respect of the scope of rights attached to securities and (or) a par value of the securities, including during the consolidation and split of the securities;
- 1.12. Passing a resolution for the Company to buy back (emergence of the grounds to buy back) the Company’s

- outstanding securities;
- 1.13. An accrued (declared) and (or) paid income on the Company's securities, other payments due to the holders of the Company's securities, and an intent to fulfil the duty to make payments on the Company's bonds, the rights to which are recorded in the Company's share register;
 - 1.14. The inclusion of the Company's securities by a Russian trade organiser in the list of securities admitted to organised trading for the conclusion of purchase and sale agreements, and in particular, the inclusion of the Company's securities by a Russian stock exchange into a quotation list; or exclusion of the Company's securities by the Russian trade organiser from the list of securities admitted to organised trading for the conclusion of purchase and sale agreements, and in particular, the exclusion of the Company's securities by a Russian stock exchange from a quotation list, or transfer of the Company's securities from one quotation list to another (exclusion of the Company's securities from one quotation list and inclusion thereof in another quotation list);
 - 1.15. The inclusion of the Company's securities (securities of a foreign entity certifying the rights in respect of the securities of the Russian issuers (hereinafter the 'depository securities') in the list of securities admitted to trading on a foreign (regulated) financial market, in particular, the inclusion of the above securities by a foreign stock exchange in a quotation list; and exclusion of the Company's securities (depository securities) from the list of securities admitted to trading on a foreign organised (regulated) financial market, in particular, the exclusion of the above securities from a quotation list by a foreign stock exchange;
 - 1.16. The failure by the Company to perform its obligations to holders of its securities;
 - 1.17. The obtaining by an entity of the right or termination of such entity's right to, directly or indirectly (through entities under its control), independently or jointly with other entities related to it under a fiduciary management agreement and (or) simple partnership agreement, and (or) agency agreement and (or) shareholder agreement and (or) any other agreement whose subject is the exercise of the rights conferred by the Company's shares, dispose of a certain number of votes conferred by the voting shares constituting the Company's authorised capital, if this number of votes is five (5) per cent or has become over or below five (5), ten (10), fifteen (15), twenty (20), twenty-five (25), thirty (30), fifty (50), seventy-five (75) or ninety-five (95) per cent of the total number of votes conferred by the voting shares constituting the Company's authorised capital;
 - 1.18. A voluntary, in particular, a competitive, or mandatory proposal to purchase the Company's securities received by the Company pursuant to Chapter XI.1 of the Federal Law *On Joint Stock Companies*, and amendments to such proposals;
 - 1.19. A notice of the right to request a buyback of the Company's securities or a request to buy back the Company's securities received by the Company pursuant to Chapter XI.1 of the Federal Law *On Joint Stock Companies*;
 - 1.20. The discovery of errors in the Company's previously disclosed reporting (accounting (financial) statements, consolidated financial statements, or financial statements);
 - 1.21. The conclusion by the Company or an entity controlled by and significant for the Company as determined by Clause 1.14 of the Bank of Russia Regulation No. 714-P (hereinafter the 'entity controlled by and significant for the Company') of a transaction, which amount totals ten (10) and more per cent of the balance sheet value of the assets of the Company or the entity controlled by and significant for the Company based on accounting (financial) statements of the Company or the above entity as of the last reporting date (the date of the end of the last complete reporting period preceding the date of transaction);
 - 1.22. The conclusion by the Company or the entity controlled by and significant for the Company of a related-party transaction having the characteristics specified in Clause 53.1 of the Bank of Russia Regulation No. 714-P;
 - 1.23. Changes in the structure and (or) amount of the collateral securing the Company's secured bonds; and in case of changes in the structure and (or) amount of the collateral securing the Company's mortgage bonds, then this item includes information on such changes if they are caused by the substitution of any pledge-backed claim constituting the mortgage securing the bonds or substitution of any other property constituting the mortgage securing the bonds whose value (money value) is ten (10) and more per cent of the amount of the mortgage securing the bonds;

- 1.24. The obtaining by the Company of the right or termination of the Company's right to directly or indirectly (through entities under its control), independently or jointly with other entities related to it under a fiduciary management agreement and (or) simple partnership agreement, and (or) agency agreement and (or) shareholder agreement and (or) any other agreement whose subject is the exercise of the rights conferred by the shares of an entity whose securities are admitted to organised trading, dispose of a certain number of votes conferred by the voting shares constituting its authorised capital, if such number of votes is five (5) per cent or became over or below five (5), ten (10), fifteen (15), twenty (20), twenty-five (25), thirty (30), fifty (50), seventy-five (75) or ninety-five (95) per cent of the total number of votes conferred by the voting shares constituting the authorised capital of above entity;
- 1.25. The conclusion by an entity controlling the Company or an entity controlled by the Company of an agreement envisaging the obligation to purchase the Company's securities;
- 1.26. The obtaining by the Company's bondholders of the right or termination of the Company's bondholders' right to demand of the Company to early redeem the Company's bonds held by them;
- 1.27. The assignment of a rating to securities and (or) the Company; changing of a rating by a rating agency or other entity under an agreement concluded with the Company;
- 1.28. The initiation of court proceedings in connection with a dispute related to incorporation, management of or participation in the Company (hereinafter the 'corporate dispute') or any other dispute, in which the Company acts as a plaintiff or defendant and the amount of claims is ten (10) or more per cent of the book value of the assets based on the Company's accounting (financial) statements as of the last reporting date (date of the end of the last complete reporting period preceding the date of the acceptance by a court of a claim for proceedings) (hereinafter the 'material dispute'), as well as the issue of a court ruling, resulting from a hearing on the merits of a corporate or material dispute, except for the information specified in Clause 41.6 of the Bank of Russia Regulation No. 714-P;
- 1.29. Placing outside the Russian Federation bonds or other financial instruments certifying loan obligations that are performed at the Company's expense;
- 1.30. The resolution of the Bank of Russia to relieve the Company of the information disclosure obligation under the Article 30 of the Federal Law On Securities Market;
- 1.31. The acquisition (disposal) by the Company or an entity controlled by the Company of the Company's voting shares or depository securities certifying rights attached to the Company's voting shares, except for the acquisitions of the Company's voting shares (depository securities certifying rights attached to the Company's voting shares) within the placement of the Company's voting shares or the acquisition (disposal) of the Company's voting shares (depository securities certifying rights attached to the Company's voting shares) by a broker and (or) fiduciary manager acting on their own behalf at the expense of and under instructions by a client;
- 1.32. Holding a general meeting of the Company's bondholders and its agenda, resolutions passed by a general meeting of the Company's bondholders and declaring a general meeting of the Company's bondholders as failed;
- 1.33. After a bond issue registration, the selection of a representative of bondholders by a bond issuer;
- 1.34. The date, from which a representative of bondholders exercises their powers;
- 1.35. The conclusion by the Company of a novation agreement or an accord and satisfaction agreement resulting in termination of the liabilities under the Company's bonds;
- 1.36. The obtaining by holders of the Company's convertible securities of the right to demand that the Company convert the Company's convertible securities held by them;
- 1.37. Information constituting the Company's annual consolidated financial statements (financial statements), interim consolidated financial statements (financial statements), for the reporting period consisting of six (6) months of the reporting year, as well as information contained in the auditor's report on these statements or other document issued based on results of the audit of interim consolidated financial statements (financial statements) in accordance with the audit standards;
- 1.38. Information contained in the Company's annual reports, except for information already disclosed;
- 1.39. Information constituting the Company's interim accounting (financial) statements for a reporting period

- consisting of three (3), six (6) or nine (9) months of a reporting year together with the information contained in the auditor's reports on these statements if an audit was conducted in respect of above statements, as well as information constituting the Company's annual accounting (financial) statements together with an auditor's report on these statements if an audit was conducted in respect thereof;
- 1.40. Information contained in the reports of an issuer of issuable securities for the reporting periods consisting of six (6) and twelve (12) months, except for information already disclosed;
 - 1.41. Information contained in the Company's security prospectus, except for information already disclosed;
 - 1.42. Information constituting the terms and conditions of security placement determined by the Company in a separate document, except for information already disclosed (in case of absence of a prospectus or absence of such terms and conditions in a prospectus);
 - 1.43. The execution by the Company of a strategic partnership or any other agreement (transaction), except for agreements (transactions) stipulated by lines 1.21, 1.22 and 1.27 of the Appendix to the Bank of Russia Ordinance No. 5946-U dated 27 September 2021, if the execution of such agreements (transactions) may materially affect the price of the Company's issuable securities admitted to organised trading (in respect of which an application for admission to organised trading was submitted);
 - 1.44. The adopting by a court, Arbitrazh court, or the Federal Bailiffs Service of interim measures (including arrest) related to cash or other property owned by the Company, any entity controlling or controlled by and significant for the Company, or any person that provided security for the Company's bonds admitted to organised trading (in respect of which an application for admission to organised trading was submitted), who is not the Russian Federation providing the state guarantee of the Russian Federation, or a constituent entity of the Russian Federation providing a guarantee of a constituent entity of the Russian Federation or a municipality providing a municipal guarantee, equal to ten (10) or more per cent of the book value of such entity's or person's assets as of the end date of the most recent completed reporting period preceding the adoption of interim measures;
 - 1.45. The obtaining by an entity of the right or termination of such entity's right to directly or indirectly (through entities under its control), independently or jointly with other entities related to it under a fiduciary management agreement and (or) simple partnership agreement, and (or) agency agreement and (or) shareholder agreement and (or) any other agreement whose subject is the exercise of the rights conferred by the shares in an entity that provided a surety, guarantee or collateral for the Company's bonds admitted to organised trading (in respect of which an application for admission to organised trading is submitted) if an entity that provided such surety, guarantee or collateral for such bonds is not the Russian Federation providing a state guarantee of the Russian Federation, a constituent entity of the Russian Federation providing a state guarantee of a constituent entity of the Russian Federation, or a municipality providing a municipal guarantee, dispose of a certain number of votes conferred by the voting shares constituting its authorised capital if such number of votes totals five (5) per cent or has become over or below five (5), ten (10), fifteen (15), twenty (20), twenty-five (25), thirty (30), fifty (50), seventy-five (75), or ninety-five (95) per cent of the total number of votes attached to voting shares that constitute an authorised capital of such entity.
 - 1.46. Circumstances stipulated by paragraph 2, Sub-clause 23, Clause 1, Article 2 of the Federal Law On Securities Market, depending on occurrence or non-occurrence of which the payments on the Company's structured bonds admitted to organised trading (in respect of which an application for admission to organised trading is submitted) (including payments upon redemption of structured bonds) (hereinafter the 'circumstances') are made or not made, with an indication of numeric values (parameters, conditions) of the circumstances or a procedure of the determination thereof as well as the amount of payments per a structured bond (including an amount of payment upon the redemption of a structured bond) or a procedure of the determination of such amount, except for the information already disclosed;
 - 1.47. The numeric values (parameters, conditions) of the circumstances or the procedure of determination thereof as well as the amount of payments on a structured bond (including the amount of payment upon redemption of a structured bond) or the procedure to determine such amount, if they are established by the Company's authorised body before the structured bonds placement under Sub-clauses 1 and 2, Clause 3, Article 27.1-1 of the Federal Law On Securities Market, except for the information already disclosed (if such information is not contained in the resolution on the structured bond issue);
 - 1.48. The Company is advised by preliminary investigation or inquiry agencies of a criminal case against a

member of the management bodies of the Company, an entity controlled by and significant for the Company, or a person providing collateral for the Company's bonds admitted to organised trading (in respect of which an application for admission to organised trading is submitted);

- 1.49. Information contained in materials, based on which the Company's governing bodies, except for general shareholder meeting, pass the resolutions that may materially affect the price of the Company's securities admitted to organised trading (in respect of which an application for admission to organised trading is submitted), except for information already disclosed;
- 1.50. Other events (actions) that, in the Company's opinion, materially affect the price or quotations of its securities.

2. In addition to the information classified as inside information by the Central Bank of Russia, Public Joint Stock Company Acron's inside information also includes:

- 2.1 Recommendations by the Company's Strategic Planning and Corporate Governance Committee related to distribution of the Company's profit and loss (including share dividend amount and record date);
- 2.2 Resolution by the Company's Strategic Planning and Corporate Governance Committee on preliminary consideration of the Board's position on agenda items of the Company's general meeting;
- 2.3 Information constituting interim consolidated financial statements (financial statements) of the issuer for the reporting period consisting of three (3) or nine (9) months of a reporting year, as well as the information contained in auditor reports on such statements or in other document issued based on results of an audit of interim consolidated financial statements (financial statements) in accordance with audit standards, if interim consolidated financial statements (financial statements) of the issuer for such reporting periods are issued.