APP	ROVED		
President (Chairman of the Management Board)			
signed			S. Karatayev
01	April	2024	

## Corporate List of Insider Information of Novolipetsk Steel (NLMK)

This List has been developed in accordance with the Directive of the Bank of Russia dated 27.09.2021 N 5946-U "The List of Insider Information of Legal Entities Specified in Paragraphs 1, 3, 4, 11 and 12 of Article 4 of Federal Law dated 27.07.2010 N 224-FZ "Countering Illegal Use of Insider Information and Market Manipulation and Amendments to Certain Legislative Acts of the Russian Federation", and the Procedure and Terms of its Disclosure", the Directive of the Bank of Russia dated 28.06.2023 N 6476-U "Amendments to the Appendix to the Bank of Russia's Directive N 5946-U dated 27.09.2021" and the Regulations on Insider Information of Novolipetsk Steel Public Joint Stock Company.

## Insider information includes information about:

- 1. Convening and holding the General Meeting of Shareholders of the Company, declaring the General Meeting of Shareholders of the Company invalid, as well as resolutions adopted by the General Meeting of Shareholders of the Company.
- 2. Holding a meeting of the Board of Directors of the Company and its agenda, as well as certain decisions made by the Board of Directors of the Company with regard to:
  - proposal to the General Meeting of Shareholders of the Company to establish in the resolution on the payment (declaration) of dividends a certain date on which the persons entitled to dividends are determined;
  - distribution or sale of the Company's securities;
  - determining or the procedure for determining the offer price of shares or securities convertible into shares;
  - establishing an executive body of the Company and an early termination (suspension) of its powers, including the powers of a managing organization or a manager;
  - including candidates in the list of nominees for voting at the General Meeting of Shareholders of the Company on the election of members of the Board of Directors of the Company;
  - recommendations regarding the amount of dividends on the Company's shares and the procedure for their payment;
  - approval of the Company's internal documents;
  - consent to or subsequent approval of a transaction (several interrelated transactions) of the Company recognized as a major transaction and (or) related-party transaction in accordance with the laws of the Russian Federation, as well as another transaction (several interrelated transactions), the amount of which is 10 or more percent of the value of assets determined

according to the consolidated financial statements (financial statements) of the Company, and if the Company is not obliged to prepare and disclose the consolidated financial statements (financial statements) - according to the Company's accounting (financial) statements as of the last reporting date (the end date of the most recently completed reporting period preceding the date of decision-making to consent to the transaction or the date of the transaction, if a decision is made on its subsequent approval);

- delegation of powers of the sole executive body of the Company, which is a business entity, to a managing organization or a manager, approval of the managing organization or a manager, terms and conditions of the contract concluded by the Company with the managing organization or a manager;
- approval of the registrar maintaining the register of the Company's securities holders, terms and conditions of the contract with the registrar in terms of maintaining the register of the Company's securities holders, as well as termination of the contract with the registrar.
- 3. Decision-making on the reorganization or liquidation of the entity having provided security for the Company's bonds.
- 4. Appearance of bankruptcy signs in the Company or the entity having provided security for the Company's bonds, as stipulated by Federal Law No. 127-FZ "On Insolvency (Bankruptcy)" dated 26 October 2002.
- 5. Acceptance by an arbitration court of the application to declare the Company insolvent (bankrupt), as well as the arbitration court's decision to declare the Company insolvent (bankrupt), to introduce one of the bankruptcy procedures with respect to the Company, and to terminate bankruptcy proceedings with respect to the Company.
- 6. Date on which the persons entitled to exercise rights on the Company's securities are determined (fixed).
- 7. Stages of the procedure for issuing the Company's securities.
- 8. Suspending and resuming the issuance of the Company's securities.
- 9. Recognizing the bond program failed, recognizing the issue (additional issue) of the Company's securities failed or invalid.
- 10. Redemption of the Company's securities.
- 11. Registering amendments to the decision to issue securities in terms of changing the scope of rights on securities and (or) the nominal value of securities, including in the course of their consolidation or split.
- 12. Decision-making on acquisition (occurrence of grounds for acquisition) by the Company of securities distributed by it.
- 13. Accrued (declared) and (or) paid income on the Company's securities, other payments due to the holders of the Company's securities, as well as the intention to fulfil the obligation to make payments on the Company's bonds, the rights to which are recorded in the register of the Company's securities holders.
- 14. Inclusion of the Company's securities by the Russian trade organizer in the list of securities admitted to organized trading for the conclusion of purchase and sale agreements, including inclusion of the Company's securities by the Russian exchange in the quotation list, or exclusion of the Company's securities by the Russian trade organizer from the list of securities admitted to organized trading for the conclusion of purchase and sale agreements, including exclusion of the Company's securities by

- the Russian exchange from the quotation list, as well as transfer of the Company's securities from one quotation list to another quotation list (exclusion of the Company's securities from one quotation list and their inclusion in another quotation list).
- 15. Inclusion of the Company's securities (securities of a foreign organization certifying rights in respect of the Russian Company's securities (hereinafter referred to as depositary securities) in the list of securities admitted to trading on a foreign organized (regulated) financial market, including inclusion of such securities by a foreign exchange in the quotation list, and exclusion of the Company's securities (depositary securities) from the list of securities admitted to trading on a foreign organized (regulated) financial market, including exclusion of these securities by the foreign exchange from the quotation list.
- 16. Failure to meet the Company's obligations to the holders of its securities, as well as changes in the total number of bonds for which the early redemption obligations have not been met.
- 17. Acquisition by a party of or termination of a party's right to directly or indirectly (via controlled parties), independently or jointly with other parties related to it by virtue of a fiduciary management agreement, and (or) a simple partnership agreement, and (or) a commission agreement, and (or) a shareholder agreement, and (or) any other agreement on the exercise of rights certified by the Company's stocks (shares), to manage a certain number of votes related to the voting stocks (shares), which make up the authorised capital of the Company, when the said number of votes account for five percent or become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes related to the voting shares, which make up the authorised capital of the Company.
- 18. Voluntary, including competitive, or mandatory offer to purchase its securities received by the Company in accordance with Chapter XI.1 of the Federal Law "Joint-Stock Companies", as well as changes made to the said offers.
- 19. Notice received by the Company in accordance with Chapter XI.1 of the Federal Law "Joint-Stock Companies" on the right to demand redemption of the Company's securities or demand for redemption of the Company's securities.
- 20. Errors detected in the Company's previously disclosed statements (accounting (financial) statements, consolidated financial statements, financial statements).
- 21. Conclusion by the Company or an organization controlled by the Company, which is material to the Company, of a transaction, the amount of which is 10 or more percent of the value of assets determined according to the Company's consolidated financial statements (determined according to the Company's financial statements, if the transaction is concluded by the Company, which is not obliged to prepare and disclose consolidated financial statements, or according to the Company's accounting (financial) statements, if the transaction is concluded by the Company, which is not obliged to prepare and disclose financial statements, or in the aggregate according to the accounting (financial) statements (aggregate value of assets) of the Company and an organization controlled by the Company that is material to it, if the Company is not obliged to prepare and disclose consolidated financial statements, and the transaction is concluded by an organization controlled by the Company that is material to it) as of the last reporting date (the end date of the last completed reporting period preceding the date of the transaction).
- 22. Conclusion by the Company or an organization controlled by the Company, which is of material importance for the Company, of a related-party transaction that meets the criteria specified in clause 35.1 of Regulations of the Bank of Russia No. 714-P.
- 23. Change of composition and (or) size of pledge under the Company's bonds with collateral security,

and should composition and (or) size of pledge under the Company's mortgage-secured bonds change - information about said changes, should they result from the substitution of any pledge-secured claim representing bond mortgage security, or substitution of another property constituting bond mortgage security, the value (monetary valuation) of which amounts to 10 or more percent of bond mortgage security.

- 24. Obtaining by the Company of a right or termination of the Company's right to directly or indirectly (through entities persons controlled by it), independently or jointly with other entities related to the Company under a property trust management agreement and (or) simple partnership agreement, and (or) assignment agreement, and (or) shareholder agreement, and (or) another agreement, the subject of which is the exercising of rights certified by shares (stakes) of an organization whose securities are admitted to organized trading to dispose of a certain number of votes attributable to the voting shares (stakes) comprising its authorized capital, if the said number of votes is 5 percent or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attributable to the voting shares (stakes) comprising the authorized capital of the said organization.
- 25. Conclusion by an entity controlling the Company or an organization controlled by the Company of an agreement stipulating the obligation to purchase the Company's securities.
- 26. Occurrence and (or) termination of the right of the Company's bondholders to demand from the Company early redemption of the Company's bonds owned by them.
- 27. Assigning a rating to securities and (or) the Company, as well as changing the rating by a credit rating agency or another organization on the basis of an agreement concluded with the Company.
- 28. Initiation of proceedings in court on a dispute related to the establishment of the Company, its management or interest in it (hereinafter referred to as a corporate dispute), or any other dispute where the plaintiff or defendant is the Company and the claims amount to 10 or more percent of the book value of assets determined according to the Company'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) (hereinafter referred to as a material dispute), as well as the adoption of a judicial act that ends the substantive consideration of a case on a corporate dispute or a material dispute, except for the information specified in clause 41.6 of the Bank of Russia's Regulations N 714-P.
- 29. Placement outside the Russian Federation of bonds or other financial instruments certifying loan obligations, the performance of which is at the expense of the Company.
- 30. Decision of the Bank of Russia to release the Company from the obligation to disclose information in accordance with Article 30 of the Federal Law "On the Securities Market".
- 31. Acquisition (alienation) of voting shares (stakes) of the Company or depositary securities certifying rights in respect of voting shares of the Company by the Company or an organization controlled by the Company, except for the cases of acquisition of voting shares of the Company (depositary securities certifying rights in respect of voting shares of the Company) in the process of placement of voting shares of the Company or acquisition (alienation) of voting shares of the Company (depositary securities certifying rights in respect of voting shares of the Company) by a broker and (or) trustee acting on their own behalf but at the expense of the client pursuant to the client's instructions.
- 32. Interim accounting (financial) statements of the Company 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 audited, and annual accounting (financial) statements

- of the Company, together with the auditor's report thereon, if audited.
- 33. Annual consolidated financial statements (financial statements) of the Company, interim consolidated financial statements (financial statements) of the Company for the reporting period consisting of 6 months of the reporting year, as well as information contained in the auditor's reports prepared in respect of the said statements, or another document prepared following the audit of interim consolidated financial statements (financial statements) in accordance with auditing standards.
- 34. Information contained in the Company's securities prospectus, except for information that has been previously disclosed.
- 35. Terms and conditions of securities placement determined by the Company in a separate document, except for information that has been previously disclosed (in case a securities prospectus is not available or does not contain the terms and conditions of securities placement).
- 36. Information contained in the reports of the issuer of equity securities prepared for the reporting periods consisting of 6 months and 12 months, except for information that has been previously disclosed.
- 37. Information contained in the Company's annual reports, except for information that has been previously disclosed.
- 38. Conclusion by the Company of a strategic partnership agreement or another agreement (transaction), except for agreements (transactions) stipulated by items 21, 22, 27 of this List, if the conclusion of such an agreement (transaction) may have a significant impact on the price of the Company's securities admitted to organized trading (in respect of which an application for admission to organized trading has been submitted).
- 39. Holding and agenda of the general meeting of the Company's bondholders, decisions made by the general meeting of the Company's bondholders, as well as declaring the general meeting of the Company's bondholders invalid.
- 40. Determination by the Company of the bonds of the representative of bondholders after the bonds issue is registered.
- 41. Date on which the bondholders' representative starts to exercise his or her authority.
- 42. Conclusion by the Company of an agreement on novation or provision of compensation resulting in termination of obligations under the Company's bonds.
- 43. Occurrence of the right of the holders of the Company's convertible securities to demand from the Company the conversion of the Company's convertible securities owned by them.
- 43.1. Project(s) selected by the Company for financing and (or) refinancing of which monetary funds received from placement of bonds, the issue (programme) of which is additionally identified using the words "green bonds", "social bonds", "sustainable development bonds", "adaptation bonds" (hereinafter green bonds, social bonds, sustainable development bonds, adaptation bonds) are used (will be used), if such project(s) is (are) not specified in the decision to issue green bonds, social bonds, sustainable development bonds, adaptation bonds.
- 43.2. Conducting and results of an independent external assessment of compliance of the issue (programme) of green bonds, social bonds, sustainable development bonds, bonds, the issue (programme) of which is additionally identified using the words "bonds related to sustainable development goals" (hereinafter bonds related to sustainable development goals), adaptation bonds or the Company's policy on the use of funds received from the placement of these bonds, or

- project(s), for the financing (refinancing) of which monetary funds received from the placement of such bonds will be used, with the principles and standards of financial instruments specified in the decision on the issuance of such bonds.
- 43.3. Conducting and results of an independent external assessment of changes made to the issuer's policy on the use of funds received from the placement of green bonds, social bonds, sustainable development bonds, adaptation bonds.
- 43.4. Conducting and results of an independent external assessment of changes made to the Company's climate transition strategy (if the changes concern the Company's performance targets and their intermediate and final values, the internationally recognized climate change scenario that is the basis for the development of the Company's climate transition strategy, as well as affect the achievability of intermediate and final values of the Company's performance targets by implementing the issuer's climate transition strategy) of bonds, the issue (programme) of which is additionally identified using the words "climate transition bonds" (hereinafter climate transition bonds).
- 43.5. Misuse of monetary funds received from placement of green bonds, bonds, the issue (programme) of which is additionally identified using the words "infrastructure bonds", social bonds, sustainable development bonds, adaptation bonds, and consequences of misuse of the said monetary funds stipulated by the decision on bond issue.
- 43.6. Violation of the principles and standards of financial instruments specified in the decision to issue bonds when implementing a project(s) for financing and (or) refinancing of which monetary funds received from placement of green bonds, social bonds, sustainable development bonds, adaptation bonds are used.
- 43.7. Inclusion of green bonds, social bonds, sustainable development bonds, adaptation bonds in the list of financial instruments of sustainable development published on the dedicated page of the methodological centre of State Development Corporation "VEB.RF" in the Internet information and telecommunication network, or in the list of financial instruments of sustainable development maintained by the International Capital Markets Association (ICMA) or the "Climate Bonds Initiative" (CBI) international non-profit organization, and the removal of such bonds from the said list.
- 43.8. Achievement or non-achievement of intermediate (if any) or final target values of the key performance indicator(s) of the bond Company specified in the decision on the bond issue related to sustainable development goals.
- 43.9. Achievement or non-achievement of intermediate or final target values of the performance indicators of the Company of climate transition bonds specified in the Company's strategy for changing its operations to transition to a low-carbon economy (energy transition), mitigate climate change and reach other goals set by the Paris Agreement of 12 December 2015, adopted by Resolution of the Government of the Russian Federation dd. 21 September 2019 N 1228 "On the adoption of the Paris Agreement" (entered into force on 6 November 2019 for the Russian Federation).
- 44. Adoption by a court, arbitration court or the Federal Bailiff Service of injunctive relief (including seizure) with respect to cash or other property owned by the Company, its controlling organization, an organization controlled by the Company that is material to it, or that has provided security for the Company's bonds admitted to organized trading (in respect of which an application for admission to organized trading has been filed) to an entity that is not the Russian Federation, which provided a state guarantee of the Russian Federation, a constituent entity of the Russian Federation, or a municipal entity, which provided a municipal guarantee, constituting 10 or more percent of the book value of

- the assets of these entities as of the end day of the last completed reporting period preceding the adoption of injunctive relief.
- 45. Acquisition or termination by an entity of the right to directly or indirectly (through entities controlled by it), independently or jointly with other entities related to it by a property trust management agreement, and (or) simple partnership, and (or) assignment, and (or) shareholder agreement, and (or) another agreement, the subject of which is the exercise of rights certified by shares (stakes) of the organization that provided a surety, guarantee or pledge for the Company's bonds admitted to organized trading (in respect of which an application has been submitted for admission to organized trading), if the entity that provided such surety, guarantee or pledge for such bonds is not the Russian Federation, which provided a state guarantee of the Russian Federation, a constituent entity of the Russian Federation, or a municipal entity, which provided a municipal guarantee, to dispose of a certain number of votes attributable to the voting shares (stakes) constituting the authorized capital of the said organization, if the said number of votes is 5 percent or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attributable to the voting shares (stakes) constituting the charter capital of the said organization.
- 46. Circumstances envisaged by the second paragraph of subclause 23 of clause 1 of Article 2 of the Federal Law "On the Securities Market", depending on the occurrence or non-occurrence of which payments are made or not made on the Company's structured bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted) (including payments upon redemption of structured bonds) (hereinafter referred to as liabilities), specifying the numerical values (parameters, conditions) of the liabilities or the procedure for their determination, as well as the amount of payments under the structured bond (including the amount of payments upon redemption of the structured bond) or the procedure for determining it, except for information that has been previously disclosed.
- 47. Numerical values (parameters, conditions) of circumstances or the procedure for their determination, as well as 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, if they are determined by the authorized body of the Company prior to the placement of structured bonds in accordance with subclauses 1 and 2 of clause 3 of Article 27.1-1 of the Federal Law "On the Securities Market", except for information that has been previously disclosed (if such information is not contained in the decision to issue a structured bond).
- 48. Initiation of criminal proceedings (received by the Company from preliminary investigation or inquiry bodies) against a person who is a member of the Company's management bodies, an organization controlling the Company, an organization controlled by the Company that is of material importance for the Company, or a person who has provided security for the Company's bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted).
- 49. Information contained in materials on the basis of which the Company's management bodies, except for the General Meeting of Shareholders, make decisions that may have a material impact on the price of the Company's securities admitted to organized trading (in respect of which an application for admission to organized trading has been submitted), except for information that has been previously disclosed.
- 50. Accident that has occurred at hazardous production facilities operated by the Company, defined in accordance with Federal Law No. 116-FZ "On Industrial Safety of Hazardous Production Facilities" dated 21 July 1997, if such information may have a material impact on the price of the Company's

- securities admitted to organized trading (in respect of which an application for admission to organized trading has been submitted).
- 51. Approval of amendments to the Dividend Policy of the Company.
- 52. Other events (actions) that the Company believes to have a significant impact on the value or quotes of its securities.