

**INFORMATION ON THE LEGAL CONSEQUENCES OF THE UNLAWFUL USE
OF INSIDER INFORMATION BY AN INSIDER
OF JSC INK-CAPITAL AND (OR) MARKET MANIPULATION**

1. Any person who has unlawfully used (misused) insider information and (or) manipulated the market is held liable (in accordance with the laws of the Russian Federation, taking into account the provisions of Article 7 of the Federal Law On Countering the Unlawful Use of Insider Information and Market Manipulation and on Amending Certain Legislative Acts of the Russian Federation (hereinafter referred to as the Federal Law).

2. Any person who disseminated false information is not held liable for market manipulation if the person was not aware and should not have been aware that the disseminated information is false.

2.1. Any person who used insider information is not held liable for the unlawful use (misuse) of insider information, if the person was not aware and should not have been aware that such information is insider information. Also, issuers, their officers and employees are not liable for the absence of information in their own lists of insider information that is not included [in the list](#) of insider information of issuers approved by a regulatory act of the Bank of Russia in accordance with [Part 1 of Article 3](#) of the Federal Law.

Administrative liability:

Article 15.30. Market manipulation

Market manipulation, if this action does not contain a criminal offense, -

shall lead to an administrative fine: for individuals in the amount of three thousand to five thousand rubles; for officers - from thirty thousand to fifty thousand rubles or disqualification for a period of one to two years; for legal entities - in the amount of excess income or the amount of losses that an individual, officer or legal entity avoided as a result of market manipulation, but not less than seven hundred thousand rubles.

Criminal liability:

Article 185.3. Market manipulation

1. Market manipulation, that is, deliberate dissemination through mass media, including electronic, information and telecommunication networks (inter alia, the Internet network), deliberately false information or entering into (performing) transactions with financial instruments, foreign currency and (or) goods, or other willful acts prohibited by the laws of the Russian Federation on countering the unlawful use (misuse) of insider information and market manipulation, if, as a result of such unlawful actions, the price, demand, supply or volume of trading in financial instruments, foreign currency and (or) goods deviated from the level or were maintained at a level significantly different from the level

that would have formed without taking into account the above unlawful actions, and such actions have caused heavy damage to individuals, organizations or the state, or led to receiving of excess income or avoidance of losses on a large scale, -

shall be punished by a fine in the amount of three hundred thousand to five hundred thousand rubles, or by a fine in the amount of the convict's salary, or any other income of the convicted person for a period of one to three years, or by compulsory labor for a period of up to four years, with disqualification from holding certain positions or engaging in certain activities for a period of up to three years or without such time period, or by imprisonment for a period of up to four years with a fine of up to fifty thousand rubles or in the amount of the convict's salary or other income of the convicted person for a period of up to three months, or without such time period, with disqualification from holding certain positions or engaging in certain activities for up to three years or without such time period.

2. Actions stipulated by Part 1 of this Article, committed by an organized group, or causing damage on especially large scale to individuals, organizations or the state, or leading to receiving of excess income or avoidance of losses on especially large scale, -

shall be punished by a fine in the amount of five hundred thousand to one million rubles, or by a fine in the amount of the convict's salary, or any other income of the convicted person for a period of two to five years, or by compulsory labor for a period of up to five years, with disqualification from holding certain positions or engaging in certain activities for a period of up to three years or without such time period, or by imprisonment for a period of up to seven years with a fine of up to one million rubles or in the amount of the convict's salary or other income of the convicted person for a period of up to three years, or without such time period, with disqualification from holding certain positions or engaging in certain activities for up to three years or without such time period.

Notes. 1. Heavy damage, excess income, losses on a large scale in this Article shall be recognized to be damage, excess income, or losses in the amount exceeding three million seven hundred and fifty thousand rubles, and on especially large scale - fifteen million rubles respectively.

2. In this Article, excess income shall be recognized to be income defined as the difference between income received as a result of unlawful actions and income that would have been received without taking into account the unlawful actions stipulated by this Article.

3. Avoidance of losses in this Article and Article 185.6 of this Code shall be recognized to be losses that a person has avoided as a result of unlawful use of insider information and (or) market manipulation.

Article 185.6. Unlawful use of insider information

1. Deliberate use of insider information to perform transactions with financial instruments, foreign currency and (or) goods to which such information relates, at one's own expense or at the expense of a third party, as well as deliberate use of insider information by giving recommendations to third parties, imposing, or inducing them in any other way to purchase or sell financial instruments, foreign currency and (or) goods, if such use has caused heavy damage to individuals, organizations or the state, or led to receiving of income or avoidance of losses on a large scale, -

shall be punished by a fine in the amount of three hundred thousand to five hundred thousand rubles, or by a fine in the amount of the convict's salary, or any other income of the convicted person for a period of one to three years, or by compulsory labor for a period of up to four years, with disqualification from holding certain positions or engaging in certain activities for a period of up to three years or without such time period, or by imprisonment for a period of two to four years with a fine of up to fifty thousand rubles or in the amount of the convict's salary or other income of the convicted person for a period of up to three months, or without such time period, with disqualification from holding certain positions or engaging in certain activities for up to three years or without such time period.

2. Deliberate use of insider information by way of its unlawful transfer to another person, if such action entailed the consequences stipulated by Part 1 of this Article -

shall be punished by a fine in the amount of five hundred thousand to one million rubles, or by a fine in the amount of the convict's salary, or any other income of the convicted person for a period of two to four years, or by compulsory labor for a period of up to four years, with disqualification from holding certain positions or engaging in certain activities for a period of up to four years or without such time period, or by imprisonment for a period of two to six years with a fine of up to one hundred thousand rubles or in the amount of the convict's salary or other income of the convicted person for a period of up to two years, or without such time period, with disqualification from holding certain positions or engaging in certain activities for up to four years or without such time period.

Notes. Heavy damage, income, losses on a large scale in this Article shall be recognized to be damage, income, or losses in the amount exceeding three million seven hundred and fifty thousand rubles.