

Confidentiality Policy of Plyterra, JSC

1.1. The present Policy is developed in accordance with the provisions of the Constitution of the Russian Federation (hereinafter - RF), the Federal Law 'On Information, Information Technologies and Information Protection', the Federal Law 'On Commercial Secrets', the Civil Code of the Russian Federation, the Federal Law 'On Personal Data', the Labour Code of the Russian Federation, and other statutory acts of the Russian Federation related to confidentiality and protection of the information.

1.2. The Policy is developed to comply with and protect the rights, business reputation and safety of the Company, as well as the rights, business reputation, and safety of partners (counterparties) of the Company, human rights and freedoms, including the right to privacy, personal and family secrets, the protection of one's honor and good name by protecting confidential information.

1.3. The Policy defines the following terms:

Confidentiality of information is a mandatory requirement for a person who has access to certain information not to transfer such information to third parties without the consent of its owner.

Confidential secrets are the information which cannot be transferred to third parties by a person who has access to this information without consent of its owner.

The confidential information includes:

- Information related to business activities, access to which is restricted in accordance with the Civil Code of the Russian Federation, Federal laws and other legal acts of the Russian Federation as well as with the international legal acts (the Trade Secrets).

- Information about the persons' data, facts, events and circumstances of the persons' private life which allow to identify their identity, including the secrecy of correspondence and negotiations (personal data).

The owner of the information is a person who independently created the information or obtained the right to allow or restrict access to the information, determined by any of the criteria, based on the law or the contract.

1.4. The Policy establishes that observation of the confidentiality of the information by the Company as well as observation of confidentiality with respect to the Company's information is mandatory.

1.5. To implement the purpose of this Policy, the Company develops the Policy on Personal Data Processing and Applicable Requirements for Personal Data Protection and the Trade Secrets Policy.

1 January 2017