

APPROVED
By Resolution of the Board of Directors
of PJSC PhosAgro dd. 03 November, 2022
(minutes of the meeting of the Board of Directors
dd. 07 November, 2022 w/o No.)

**INFORMATION POLICY GUIDELINES
of Public Joint Stock Company PhosAgro
(restated)**

**Moscow
2022**

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1. General provisions

- 1.1. These Information Policy Guidelines of PJSC PhosAgro (the “Guidelines”) have been prepared in accordance with current laws of the Russian Federation, including the Corporate Governance Code recommended for application by Letter of the Bank of Russia No. 06-52/2463 dated April 10, 2014, listing rules of PJSC Moscow Exchange as well as Charter and other internal documents of PJSC PhosAgro (the “Company”).
- 1.2. The Guidelines define the goals and principles of information disclosure by the Company, establish a list of information assumed for disclosure by the Company in addition to that provided for by law, as well as the procedure for disclosing information (including information channels to carry out the disclosure and forms of disclosure), timeframes of ensured access to disclosed information, procedures of communication between members of management bodies, officers and employees of the Company with shareholders and investors, as well as representatives of the media and other interested parties, as well as measures to ensure control over compliance with the information policy of the Company.
- 1.3. The purpose of the Company’s information policy is to meet the needs of the target audiences for reliable information about the Company as fully as possible, complying with the best practices of corporate information disclosure.
- 1.4. Information policy of the Company is implemented by executive bodies of the Company.
- 1.5. The Company’s information policy aims to:
 - 1.5.1. exercise the rights of shareholders, investors, and other interested parties to receive information essential for their investment and management decision-making;
 - 1.5.2. strengthen the Company’s business reputation;
 - 1.5.3. form a positive image of the Company with the target audiences and improve its investment case.

2. The Company’s target audiences

- 2.1. The Company’s target audiences include its shareholders and investors, creditors, business partners, mass media, NGOs and research organizations, governmental bodies, and the Company’s staff.
- 2.2. Shareholders and investors (both current and prospective) constitute a single target audience of the Company. Shareholders, as the owners of the Company, define the Company’s development strategy and oversee its management subject to the laws of the Russian Federation, the Company’s Charter and other internal documents. In addition to that, shareholders also make decisions concerning further investment in the Company’s shares and other securities. This target audience also includes commercial banks, investment companies, and brokers.
- 2.3. Creditors are banks and other credit institutions providing respective financial services to the Company.
- 2.4. The Company’s business partners are both suppliers of products or services to the Company and consumers of the Company’s products or services. The Company’s viability as a commercial structure focused on making and multiplying profits depends on this target audience.
- 2.5. Mass media are the main consumers of information about the Company, making it available to the other target audiences and the public. Mass media play an important part in the formation of the Company’s image and reputation.
- 2.6. NGOs and research organizations, mostly those located in the regions of the Company’s presence, have substantial influence over other target audiences of the Company.

- 2.7. Governmental bodies perform regulatory functions and adopt regulatory and legislative acts mandatory for economic activities of any company in the Russian Federation. Orders and resolutions of governmental bodies may substantially impact the Company's activities.
- 2.8. The Company's staff make up the audience directly responsible for success of its operations. This category encompasses all the Company's staff, including the employees of its regional offices.

3. Main principles of information policy

- 3.1. Main principles for implementation of the Company's information policy are: regularity, consistency, efficiency, accessibility, reliability, completeness, balance, equality, protection.
- 3.2. The regularity principle means that the Company provides its shareholders, investors, and other interested parties with information about the Company via available information and communication channels on a regular basis, in accordance with current laws.
- 3.3. The consistency principle means that the Company ensures the logical interconnection and consistency of the information disclosed by it.
- 3.4. The efficiency principle implies that the Company aims to provide its shareholders, investors, and other interested parties, including mass media, with information about the Company, in particular the information about the material developments and facts concerning their interests and the Company's business as promptly as possible.
- 3.5. The accessibility principle states that the means of conveying information about the Company to its shareholders, investors, and other interested parties chosen by the Company provide free and easy access to the said information for all the above-mentioned parties.
- 3.6. The reliability principle states that the Company aims to provide its shareholders, investors, and other interested parties only with true and correct information without deliberately misleading or distorted data.
- 3.7. The completeness principle means that the Company provides its shareholders, investors, and other interested parties with the information to be provided in compliance with current laws, along with other information required for their informed decision-making.
- 3.8. The balance principle states that the Company aims to maintain a reasonable balance between ensuring transparency and observing the interests of the Company and existing shareholders in terms of protecting commercial and confidential information.
- 3.9. The equality principle means that the Company provides equal rights and opportunities for obtaining and accessing its open information for all groups of interested parties.
- 3.10. The protection principle implies that the Company uses methods and means of its trade secret protection subject to the laws of the Russian Federation.

4. Methods of disclosure of the Company's information

- 4.1. The Company prepares and discloses information on its business by making it available in the following manner:
 - 4.1.1. by publishing this information on the corporate website or sending company messages via e-mail;
 - 4.1.2. by disclosing the information through comments to mass media and analysts;
 - 4.1.3. by disclosing the information in public speeches, including internet-, telephone- and press-conferences, panels, and roundtables;
 - 4.1.4. by disclosing the information through the London Stock Exchange mandatory information disclosure channels;

- 4.1.5. by publishing the mandatory information through the London Stock Exchange disclosure feeds and the agency authorized to disclose information on securities and other financial instruments (LLC Interfax CIDC).
 - 4.1.6. through active participation in conferences and other public events, in Russia or abroad;
 - 4.1.7. by granting access to the information or providing copies of documents to the Company's shareholders, governmental bodies, and any interested parties in term and manner set forth by regulatory provisions of the current laws and the Company's internal documents.
- 4.2. The Company, in parallel with the disclosure of information in Russian, has the right to disclose the same information about the Company in a foreign language and provide free access to it, including if the Company's securities are included in the list of securities admitted to trading in a foreign organized (regulated) financial market. The necessity and expediency of disclosure by the Company of information in a foreign language is determined taking into account the specifics established by the laws of the Russian Federation and the Company's internal regulatory documents.

5. Mandatory disclosure

- 5.1. The Company performs mandatory disclosure of information in accordance with the federal laws of the Russian Federation, including Federal Law No. 39-Φ3 dated April 22, 1996 "On the Securities Market", Bank of Russia Regulation No. 714-II dated March 27, 2020 "On Disclosing Information by Equity Securities Issuers" and other regulatory legal acts of the Russian Federation.
- 5.2. If the Company's securities are admitted to trading in Russia and other countries, the Company discloses information in accordance with the requirements established by the relevant Russian and foreign regulatory authorities.
- 5.3. The company performs mandatory disclosure of information on the securities market in the form of:
- 5.3.1. the Company's annual report;
 - 5.3.2. annual and interim accounting (financial) statements, as well as consolidated financial statements of the Company;
 - 5.3.3. the report of the Issuer of equity securities (Issuer's report);
 - 5.3.4. notifications about material facts;
 - 5.3.5. inside information;
 - 5.3.6. the list of affiliates;
 - 5.3.7. resolutions on issue of the securities and their prospectus.
- 5.4. The Company is also obliged to disclose other documents and information subject to mandatory disclosure in accordance with the laws of the Russian Federation, including the text of the Company's Charter, internal documents of the Company regulating the activities of its bodies, and other internal documents of the Company.
- 5.5. The list of information subject to disclosure may be amended in accordance with the changes in current laws of the Russian Federation and the requirements of the federal executive body for the securities market.

6. Voluntary disclosure

- 6.1. Apart from mandatory disclosure, the Company may voluntarily disclose the information about its business, which, as the Company believes, will be deemed to help improve the Company's public image and positively affect the value of its shares.

- 6.2. The Company may voluntarily disclose the following information:
- 6.2.1. information about the mission, strategy, corporate values and aims of the Company, as well as policies adopted by the Company;
 - 6.2.2. additional information about financial activities and financial condition of the Company;
 - 6.2.3. information on the Company's capital structure;
 - 6.2.4. changes in priority areas of the Company's business;
 - 6.2.5. quarterly supplementary performance reports;
 - 6.2.6. comments of authorized persons on the information disclosed previously in the prescribed manner;
 - 6.2.7. presentations and speeches of the Company's representatives;
 - 6.2.8. periodic information on the production, financial and economic and internal corporate activities of the Company;
 - 6.2.9. information on major events and results of the Company's business and activities;
 - 6.2.10. information on the results of the Company's social policy implementation;
 - 6.2.11. information on the activities of the Company aimed at environmental protection;
 - 6.2.12. information on the managements' speeches for mass media; press releases;
 - 6.2.13. any other information deemed material by the Company.
- 6.3. Decisions on additional information disclosure are promptly made by the Company's management, based on the degree of its importance for investment and management decision-making.

7. Statutory access to the Company's information / Provision of copies of the Company's documents

- 7.1. The Company grants access to the information or provides copies of documents to the Company's shareholders, governmental bodies, and any interested parties in term and manner set forth by regulatory provisions of the current laws and the Company's internal documents.
- 7.2. If the information requested by shareholders is confidential, shareholders are warned about the confidential nature of the requested information and assume the obligation to maintain its confidentiality.
- 7.3. In order to enable the shareholders of the Company to obtain the information they need about the legal entities controlled by the Company, the Company makes reasonable efforts to obtain such information from the relevant organization controlled by the Company.
- 7.4. The Company may waive the shareholder's right to access the information if, in the opinion of the Company's executive body, the nature and volume of the requested information show the signs of abuse by the shareholder of the right to access the Company's information. Such a waiver cannot be arbitrary or biased and shall comply with the principle of equal opportunities for shareholders, which means that, under equal conditions, shareholders should be in an equal position.

8. Measures to control compliance with the information policy of the Company

- 8.1. Compliance with the information policy is controlled by the Board of Directors of the Company.
- 8.2. The Board of Directors of the Company annually reviews the efficiency of interaction between the Company, shareholders, investors and other interested parties in terms of information, as well as the expediency (necessity) of revising the information policy of the Company.

9. Final Provisions

- 9.1. These Information Policy Guidelines are approved by the Company's Board of Directors. These Guidelines are amended or restated through resolutions of the Board of Directors of the Company.
- 9.2. Any matters not regulated by the Guidelines are subject to the laws of the Russian Federation, the Company' Charter and other internal documents of the Company.
- 9.3. Should any provisions of the Guidelines conflict with those of current laws of the Russian Federation or the Company's Charter due to any changes to the laws and/or the Charter, the said provisions of the Guidelines shall be deemed void, and until the respective amendments are made to the Guidelines, the Company's business shall be governed by the laws of the Russian Federation and the provisions of the Company's Charter.