

## Depository Receipt Cancellation – No Change of Beneficial Ownership Attestation

### NEW ATTESTATION, EFFECTIVE AUGUST 20, 2024

In accordance with current requirements in Russia, a Depository Receipt (DR) cancellation transaction can take place, so long as there is no change of beneficial ownership.

We refer to a DR cancellation transaction with the following details:

Transaction Details:

_____	_____	_____
Russian Issuer	# DRs Cancelled	DR ISIN/CUSIP
_____	_____	_____
Executing bank/broker-dealer	Account receiving Shares in Russia	Date

We certify that:

(1) Either:

(a) We are the beneficial owner of the DRs being cancelled and we are also the beneficial owner of the final account to which the resulting Shares in Russia will be credited, namely, that there will be no change of beneficial ownership as a result of this transaction,

OR

(b) We are a broker-dealer acting on behalf of our customer, and such customer has confirmed to us that it is the beneficial owner of the DRs being cancelled and it is also the beneficial owner of the final account to which the resulting Shares in Russia will be credited, namely, that there will be no change of beneficial ownership as a result of this transaction.

AND (2)

Either: (a) We were the beneficial owner of the DRs being cancelled as of April 27, 2022\*, OR

(b) We are a broker-dealer acting on behalf of our customer, and such customer has confirmed to us that it was the beneficial owner of the DRs being cancelled as of April 27, 2022\*.

*\*(2) Date for Norilsk Nickel is April 28, 2023 and not applicable to cancellations for Surgutneftegas.*

AND (3)

We, or if we are a broker-dealer acting behalf of a customer, our customer, represent, warrant and confirm that: (a) we are not a Sanctioned Person (as defined below)\*; (b) we are not acting on behalf, or for the benefit, of a Sanctioned Person.

AND (4)

We, or if we are a broker-dealer acting on behalf of a customer, our customer represent, warrant and confirm that (a) the DRs being submitted for voluntary cancellation have not been exchanged for ordinary shares under Russian Federal Law No 114-FZ with respect to Automatic conversion and (b) instructions have not been submitted to the applicable Russian custodian of BNY Mellon, as depository, to receive ordinary shares under Russian Federal Law No 114-FZ with respect to Forced conversion.

AND (5)

Certification is being provided to confirm the intent to divest our DRs and that this conversion is ordinarily incident and necessary to effectuate divestment as authorized by OFAC's General License 100A through 12:01 a.m. EDT, October 12, 2024 .

Very truly yours,

\_\_\_\_\_  
Name of Certifying Entity/Person By:

\_\_\_\_\_  
Name:

Title:

\*- For the purposes of this document:

(i) a "Sanctioned Person" means any person or entity: (a) with whom dealings are restricted or prohibited by, or are sanctionable under, any Sanctions; (b) that is located, organized or resident in a country or territory with which dealings are broadly restricted, prohibited, or made sanctionable under any Sanctions; or (c) that is otherwise the subject or target of any sanctions administered or enforced by any Sanctions Authority, including by reason of a relationship of ownership or control with (a) or (b); provided that this definition shall not include any person to which subparagraphs (a) or (c) apply solely by virtue of its or its controlling persons' inclusion in: (1) the most current "Sectoral Sanctions Identifications" list (which as of the date hereof can be found at: <https://home.treasury.gov/policy-issuances/financial-sanctions/consolidated-sanctions-list-non-sdn-lists/sectoral-sanctions-identifications-si-list>) (the "SSI List"), (2) Annexes III, IV, V and VI of Council Regulation No. 833/2014, as amended (the "EU Annexes"), (3) the "Current list of designated persons: Russia" published by the Office of Financial Sanctions Implementation of Her Majesty's Treasury of the United Kingdom (which as of the date hereof can be found at: <https://www.gov.uk/government/publications/financial-sanctions-ukraine-sovereignty-and-territorial-integrity>) (the "OFSI List") or (4) any other list maintained by a Sanctions Authority, with similar effect to the SSI List, the EU Annexes or the OFSI List;

(ii) "Sanctions" means any sanctions or other similar restrictive measures (including, for the avoidance of doubt, any sanctions or measures relating to any particular embargo or asset freezing) administered or enforced by any Sanctions Authority; and

(iii) a "Sanctions Authority" means competent governmental institutions and agencies of the U.S. government (including, without limitation, the Office of Foreign Assets Control of the U.S. Department of the Treasury, the U.S. Department of State, or the Bureau of Industry and Security of the U.S. Department of Commerce), the United Nations Security Council, the European Union, Her Majesty's Treasury of the United Kingdom, the State Secretariat for Economic Affairs of Switzerland or the Swiss Directorate of International Law, the Hong Kong Monetary Authority or the Monetary Authority of Singapore.