



EuroChem

Mineral & Chemical Company, OJSC

APPROVED

by the Board of Directors
of EuroChem Mineral & Chemical Company, OJSC
Minutes No. 07.12.19-20/10-9 dated 19 December 2007

Information Policy

EuroChem Mineral & Chemical Company, OJSC

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1. GENERAL PROVISIONS

- 1.1. This Information Policy (Policy) has been drawn up in line with Russian federal legislation, as well as EuroChem's Charter and Code of Corporate Conduct, EuroChem's internal regulatory documents and international corporate governance practices.
- 1.2. This Policy is an internal regulatory document of EuroChem (Company) and governs the rules and approaches to be followed in disclosing information and the composition of information and documents subject to disclosure in accordance with the requirements of current legislation, the Company's development strategy and shareholder interests.
- 1.3. The Company's Information Policy is aimed at fully upholding the rights of shareholders, investors and other stakeholders to receive the information they need in order to make grounded investment and management decisions.
- 1.4. The Information Policy is meant to form a positive opinion about the Company's corporate values and stimulate the growth of investor interest in the company via increased information openness and transparency.
- 1.5. The Company's General Director shall be responsible for disclosing information about the Company. The procedures for disclosing information are to be governed by current legislation and the Company's internal regulatory documents.

2. PRINCIPLES OF AND PROCEDURES FOR DISCLOSING INFORMATION

- 2.1. The key principles of information disclosure are:
 - regularity and promptness in submitting information;
 - accessibility of the information for shareholders, investors and other stakeholders;
 - accuracy and completeness of the information's contents;
 - compliance with a reasonable balance between the Company's openness and compliance with its commercial interests;
 - protection of information resources;
 - maintaining equality of the rights of all stakeholders to information without providing one group of recipients with any advantages over other groups, save for restrictions set out in current legislation.
 - 2.2. The Company shall publicly disclose information that must be disclosed in accordance with legislative requirements (reportable information).
 - 2.3. In addition to reportable information, the Company will also disclose:
 - 2.3.1. Information about parties comprising the Company's management bodies and officers:
 - members of the Company's Board of Directors;
 - members of the Company's executive management.
 - 2.3.2. Information about events of a material nature for shareholders and investors, specifically including:
 - information about members of the Company's Board of Directors;
 - information about the Company's subsidiaries and dependent companies;
 - decisions taken to increase (or reduce) the chartered capital;
 - the acquisition by the Company of its own shares, if said transaction is not related to a reduction in the Company's chartered capital (regarding the sources of funds used for acquiring the Company's own shares and about the number of shares purchased, the purchase price and the reasons and purpose of the acquisition);
 - increases (and decreases) in the price of the Company's shares amounting to at least 15%;
 - the execution by the Company of transactions which are material for the Company;
 - the cessation of production of goods, works or services, the sale of which at the end of the fiscal year preceding the reporting year amounted to at least 10% of the total volume of production of goods, works or services;
 - changes in priorities in the Company's operations;
 - significant non-financial information of a social or ecological nature, in line with international standards of corporate social responsibility;
 - changes in the Company's auditor or registrar.
- The Company must also disclose other information as stipulated by the Company's internal regulatory documents.
- A decision on the prompt disclosure of other information which may have a material impact on the financial and business operations of the Company may be taken by the Disclosure Committee upon agreement with the Chairman of the Board of Directors.
- 2.4. Forms of information disclosure:
 - Mandatory and additionally disclosed information must be published on the Company's official website at www.eurochem.ru.

- In addition, the Company may disclose information by publishing information in Russian and foreign media outlets, including in the form of an interview or speech with commentary, public speeches, and reports in response to written requests from stakeholders.
- 2.5. Information that is subject to submission to parties who are entitled to take part in a General Meeting of Shareholders must be made available on the premises at the address of the Company's CEO. As per the request of a party entitled to attend a General Meeting of Shareholders, the Company is to submit copies of documents containing the requested information.
- 2.6. The Management Board, General Director and Company officers are to ensure the submission of full and accurate information to members of the Board of Directors as part of preparing papers for Board meetings and information in line with the request of any member of the Board of Directors.
- 2.7. The right to make public speeches on issues related to the Company's operations shall be granted to the Chairman of the Board of Directors and the CEO (General Director), who are authorized to instruct Company employees to perform public speeches (present information) on behalf of the Company at conferences both in Russia and abroad, as well as meetings, seminars, and sessions of bodies functioning under ministries and agencies, bodies of executive and legislative authorities of the Russian Federation and constituents of the Russian Federation, social and non-commercial organizations, other social events, take part in press conferences, briefings, telephone and video conferences, give interviews, offer comments for Russian and foreign press and financial and investment companies.
- 2.8. Persons authorized to give commentary on behalf of the Company only on information that has been disclosed previously. The members of the Board of Directors may provide commentary on issues concerning the Company's operations and decisions taken by the Board of Directors, but only on their behalf and only after this information is disclosed by the Company.
- 2.9. The organization of the actions of the Company's representatives in terms of submitting information about the Company's production and business operations, releasing the results of corporate events and other major events concerning the Company in the form of a press release, interview, press conference, or roundtable discussion is to be carried out by the PR & Communications Department.
- 2.10. Information about the Company and its operations is to be submitted to investors and other stakeholders based on their written requests, as long as said information is not categorized as information containing a state or commercial secret and is not insider information.
- 2.11. Requests for information filed by stakeholders are to be sent directly to the Company's Corporate Secretary. The address and contact information are to be published on the Company's website.

3. MEANS OF AND TOOLS FOR DISCLOSING INFORMATION

- 3.1. In order to uphold the rights of shareholders, investors and other stakeholders to receive information, and in order to provide timely and accessible information which is material or otherwise significant for them, the Company shall use the following means of notification:
 - delivery (mailing) of documented information (in paper and/or electronic format);
 - disclosure of information via the mass media and special notification channels, including the Company's website;
 - notification of information about public speeches, as well as group and personal meetings scheduled between the Company employees and shareholders, investors and other stakeholders;
- 3.2. The Company will use the following tools to arrange information disclosure:
 - issuing press releases which contain information about events and information about the Company's operations and that of the Company's managed organizations and commentary voiced by the Company's representatives;
 - preparation and organization of interviews, press conferences and briefings with Company representatives;
 - preparation and circulation of multi-purpose electronic and print presentations about the Company;
 - publishing information in specialized foreign mass media or placement there in of information about the Company and its operations outside of Russia.

4. INFORMATION CLASSIFIED AS COMMERCIAL SECRETS AND INSIDER INFORMATION

- 4.1. Information classified as a commercial secret is defined as any information which has actual or potential commercial value for a third party who does not have access or any legal grounds to access said information given that the Company takes measures to ensure confidentiality.
- 4.2. Commercial information must be protected. The Company's executive management is to take all possible measures to protect commercial information in line with the Federal Law on Commercial Secrets.
- 4.3. Insider information is material information about the Company's operations and its transactions which is not publicly accessible and the disclosure of which could have a material impact on the market value of the Company's shares and other securities.

- 4.4. Insiders are defined as members of the Board of Directors, members of the Board committees, the CEO, members of the Management Board, members of the Company's Revision Commission, as well as other persons performing employment obligations under contract with the Company and who possess access to insider information in line with their job descriptions, or other internal regulatory document.
- 4.5. Insiders are not authorized to disclose insider information or make it accessible to any third parties, or any information based on insider information, save for instances envisaged in Russian Federal legislation.

5. CLOSING PROVISIONS

- 5.1. This Policy and any and all amendments and addenda thereto are to be approved by the EuroChem Board of Directors.
- 5.2. Enforcement of this Policy is to be carried out by the Chairman of the Board of Directors.
- 5.3. An evaluation of the effectiveness of discharging the requirements set out in this Policy is to be carried out based on the results of independent inspections, Company ratings, the results of the risk management control system, and the results of an analysis of the state of EuroChem's performance in terms of information based on regular monitoring of mass media.