

IMPORTANT NOTICE

April 21, 2022

On April 16, 2022, Russian law Federal Law No. 114-FZ, providing for the mandatory termination by Russian incorporated issuers of depositary receipt (“**DR**”) programs over their shares was signed (the “**DR Law**”). The DR Law will come into effect on April 27, 2022 (“Effective Date”). The DR Law provides for the mandatory termination of DR programs by all Russian incorporated issuers unless an express permission is obtained from the relevant Russian authority to retain the DR program. No assurance can be given that any Russian issuers will apply for such permission and would receive the required permission. **Please note that the DR Law applies only to Russian incorporated issuers and not to issuers who are incorporated outside of Russia but have assets or business interests in Russia. The issuers that may be impacted by the DR Law have an underlying share ISIN beginning “RU”.**

The DR Law provides that irrespective of provisions of the relevant deposit agreement:

- a) no new shares can be accepted for deposit in the DR program for the issuance of new DRs from the Effective Date;
- b) all voting and dividend rights attached to the shares underlying the DRs will be suspended from the Effective Date (see further below); and
- c) the record date for the surrender of DRs will be set as of the Effective Date (see further below).

The Bank of New York Mellon as depositary bank is not authorized under Russian law to claim dividends on the shares held on behalf of a DR holder. Under the DR Law, DR holders who held DRs as of the Effective Date might be able, after receiving delivery of the underlying shares, to claim unpaid dividends if they follow the procedure set out by the Russian Joint-Stock Companies Law for “unclaimed dividends”. No assurance can be given that such procedures will be available to former DR holders or that the Russian authorities will not impose additional restrictions on the ability of foreign shareholders to claim dividends.

DR holders are determined as of the Effective Date for the purposes of the DR Law, including for the purposes of withdrawing the respective number of the underlying shares upon the surrender of their DRs. **Any DRs acquired or otherwise transferred with a change in beneficial ownership following the Effective Date will not entitle the holder to withdraw the underlying shares, nor to claim for unpaid dividends or other distributions with respect to the underlying shares. Notwithstanding any provision of the relevant deposit agreement to the contrary, The Bank of New York Mellon may refuse to process any withdrawal request by any DR holder who was not a DR holder as of the Effective Date or is unable to provide evidence of the foregoing.**

The Bank of New York Mellon’s current understanding is that any Issuer terminating its DR program will be required to do so in accordance with the terms, including notice periods, set out in the applicable deposit agreement. The Bank of New York Mellon will notify DR holders of the termination of a DR program by the relevant Issuer in accordance with the terms of the applicable deposit agreement.

This notice is intended as a summary of the DR Law for information purposes only, and DR holders are encouraged to review the DR Law in its entirety. The information set out in this notice is subject to change and The Bank of New York Mellon does not undertake to keep this information up to date. This notice is not intended to provide any legal advice, and DR holders should consult with their own legal counsel for any questions related to the DR Law. This notice does not purport to address circumstances for particular companies, and sanctions and other restrictions applicable to such companies may apply.

FREQUENTLY ASKED QUESTIONS

Q. How can I retain my interest in a Russian incorporated issuer by cancelling my DRs for the underlying Russian shares?

- A. The February 28, 2022, announcement by the Central Bank of Russia that prohibited BNY Mellon as a non-Russian person, from delivering shares from its Russian custody accounts was supplemented on March 5, 2022, with the Information Letter by the Central Bank of Russia allowing for cancellations of DRs for the delivery of the underlying Russian shares where there is no change in beneficial ownership.

Effective March 30, 2022, BNY Mellon opened books for cancellations for all Russian DR programs for which it serves as Depository, in accordance with the terms outlined in the respective deposit agreements on condition of receipt of the required no change in beneficial ownership attestation.

Owners of DRs that wish to cancel the DRs and take possession of the Russian shares, should instruct their broker to surrender impacted DRs to BNY Mellon, in its capacity as Depository for impacted DR facilities, for the cancellation of the DRs and further delivery of the underlying Russian shares.

Please be advised that, due to restrictions introduced by the Central Bank of Russia, for investors surrendering DRs for delivery of the underlying Russian shares, an attestation confirming no change in beneficial ownership must accompany the request. Any cancellations requested on or after April 27th must use an updated form of attestation (which will be available on the bnymellonadr.com website), which will additionally attest to ownership of the DR by the cancelling party on April 27th, 2022, as required by the Russian Law of April 16th, 2022. Additionally, the Depository will require delivery instructions for delivery of the underlying Russian shares, which should include the bank / broker-dealer Russian account details for the applicable beneficial owner.

Additional information and instructions may be found in the News & Publications—Special Notices section of adrbnymellon.com.

Q. Are you aware of any brokers willing to open an account to hold the underlying Russian shares on my behalf?

- A. BNY Mellon, in its capacity as a depository receipts service provider, is unable to open accounts to hold Russian shares for beneficial owners of DRs. Custody clients holding DRs should leverage their custody provider to assist with the opening of an S-type account with a Russian custodian.

Q. What will happen if I am unable to cancel my DRs prior to April 27th (the effective date of the new Russian law imposing an obligation on the Russian issuer to terminate the DR program)?

- A. April 27th is the effective date of the law and does not impact cancellations. If BNY Mellon receives termination notices from issuers after that date, it will inform the market as required by the applicable deposit agreement. Typically, the deposit agreements require a termination date to be set at a future date (usually a period of around 3 months (can differ per program)). During that termination period, cancellations may continue to be

processed. Any notice that BNY Mellon publishes with respect to a given program termination will clearly set out the last date for cancellations to be processed for that program.

Q. What will happen if I am unable to cancel my DRs prior to any applicable termination date?

A. Typically, the Depositary would commence the sale of the underlying Russian shares subsequent to the applicable termination date and once permitted to do so in accordance with the terms of the applicable deposit agreement. However, due to restrictions introduced by the Central Bank of Russia, the Depositary is currently prohibited, for an indefinite period of time, from undertaking a sale of any underlying Russian shares. Accordingly, the Depositary may not be able to sell or receive any value for the underlying shares. The Depositary continues to closely monitor the situation and will publish revised information as and when necessary.

Q. What will happen if the Depositary is unable to sell the underlying Russian Shares?

A. The Depositary continues to closely monitor the situation and will publish revised information as and when necessary. The Depositary may permit holders of impacted DRs to continue to cancel after the published deadline, at its discretion and subject to any current or future limitations of such.

PLEASE SEE INVESTOR DISCLOSURE ON LAST PAGE.

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Nothing herein shall be deemed to constitute an offer to sell or a solicitation of an offer to buy securities.

BNY Mellon collects fees from DR holders pursuant to the terms and conditions of the DRs and any deposit agreement under which they are issued. From time to time, BNY Mellon may make payments to an issuer to reimburse and/or share revenue from the fees collected from DR holders, or waive fees and expenses to an issuer for services provided, generally related to costs and expenses arising out of establishment and maintenance of the DR program. BNY Mellon may pay a rebate to brokers in connection with unsponsored DR issuances; brokers may or may not disclose or pass back some or all of such rebate to the DR investor. BNY Mellon may also use brokers, dealers or other service providers that are affiliates and that may earn or share fees and commissions.

BNY Mellon may execute DR foreign currency transactions itself or through its affiliates, or the Custodian or the underlying Company may execute foreign currency transactions and pay US dollars to BNY Mellon. In those instances where it executes DR foreign currency transactions itself or through its affiliates, BNY Mellon acts as principal counterparty and not as agent, advisor, broker or fiduciary. In such cases, BNY Mellon has no obligation to obtain the most favorable exchange rate, makes no representation that the rate is a favorable rate and will not be liable for any direct or indirect losses associated with the rate. BNY Mellon earns and retains revenue on its executed foreign currency transactions based on, among other things, the difference between the rate it assigns to the transaction and the rate that it pays and receives for purchases and sales of currencies when buying or selling foreign currency for its own account. The methodology used by BNY Mellon to determine DR conversion rates is available to registered Owners upon request or can be accessed at https://www.adrbnymellon.com/us/en/news-andpublications/dr-issuers/drs_foreign_exchange_pricing_disclosure.pdf.

In those instances where BNY Mellon's Custodian executes DR foreign currency transactions, the Custodian has no obligation to obtain the most favorable exchange rate or to ensure that the method by which the rate will be determined will be the most favorable rate, and BNY Mellon makes no representation that the rate is the most favorable rate and will not be liable for any direct or indirect losses associated with the rate. In certain instances, BNY Mellon may receive dividends and other distributions from an issuer of securities underlying DRs in U.S. dollars rather than in a foreign currency. In such cases, BNY Mellon will not engage in or be responsible for any foreign currency transactions and it makes no representation that the rate obtained by an issuer is the most favorable rate and it will not be liable for any direct or indirect losses associated with the rate.

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