Procedure for forced conversion of securities of a foreign issuer certifying rights in respect of shares in an international company

1. In accordance with Art. 5 of Federal Law No. 452-FZ "On Amending Certain Legislative Acts of the Russian Federation" dated 04.08.2023 No. 452-FZ (hereinafter referred to as "**Law 452-FZ**"), holders of securities of a foreign issuer certifying rights in respect of shares of an international company (hereinafter referred to as "**ICPAO Depositary Receipts**") have the right to make a forced conversion in case of impossibility to receive shares of a Russian issuer, if the rights to ICPAO Depositary Receipts are registered by foreign organizations and the holder of ICPAO Depositary Receipts or a person in whose interests the holder of such securities holds and (or) manages them (hereinafter referred to as the Person in whose interests the holder acts) cannot receive shares in an international company (hereinafter referred to as "**ICPAO Shares**") due to the imposition of restrictive measures against him and (or) persons related to him or against foreign organizations in which his rights to ICPAO Depositary Receipts are recorded, or due to unfriendly actions of foreign states, international organizations, foreign financial organizations, including those related to the imposition of restrictive measures against the Russian Federation, Russian legal entities and citizens of the Russian Federation.

2. **The deadline for submitting documents for forced conversion:**

ETALON GROUP PLC, ISIN US29760G1031	05 November 2026 (inclusive)

3. An application for forced conversion of ICPAO Depositary Receipts into ICPAO Shares submitted by a holder or a Person for whose benefit the holder is acting (the "**Applicant**") must be accompanied by documents available in the circumstances which demonstrate:

   - the ownership by such holder of the relevant number of ICPAO Depositary Receipts,

   - the validity and legality of the interest of the person applying for compulsory conversion of ICPAO Depositary Receipts,

   - the holder's actions in the interests of the applicant, as well as the foreign nominee holder accounting for the holder's rights to ICPAO Depositary Receipts and next level nominee holders (foreign nominee holders).

4. An application for forced conversion of ICPAO Depositary Receipts in respect of which an encumbrance or restriction on the disposal of such securities has been imposed (except for a restriction on disposal imposed in connection with unfriendly actions of foreign states, international organizations, foreign financial organizations, including those related to the imposition of restrictive measures against the Russian Federation, Russian legal entities and citizens of the Russian Federation) shall contain information on the encumbrance or restriction of disposal, including the number of ICPAO Depository Receipts in respect of which it has been imposed and the person in whose favor the encumbrance or restriction of disposal has been imposed, and the application must be accompanied by documents evidencing the imposition (confirming the imposition) of the encumbrance or restriction of disposal.

5. The form of the application for forced conversion and the list of documents are given in Appendices 1 and 2 to this Procedure.

6. If there are reasonable doubts about the completeness and (or) reliability or insufficiency of the information specified in the application for forced conversion and the documents attached thereto, Rakurs Invest JSC shall have the right to refuse to open a custody account for the owner and credit the relevant number of shares of the Russian issuer to it.

7. If the total number of shares of an international company in respect of which applications have been submitted exceeds the number of shares of the international company safekept for on the custody account of depository program, no forced conversion operations shall be conducted.

8. In order to carry out forced conversion, the holder of foreign securities should apply to Rakurs Invest JSC by November 05, 2026 (inclusive) and provide information and documents specified in Appendix 1 and Appendix 2.

9. All documents must be submitted in originals with a live signature and seal, or in the form of notarized copies. If the document is issued in a foreign country, the document must be legalized in accordance with the established procedure (by consular legalization or apostille). Documents, except for those drawn up in Russian or English, must be translated into Russian with subsequent notarization of the translation. Details on the form and procedure for certifying each type of document are specified in Appendix 2.

10. Documents may be submitted by the Applicants in person (or by a representative by power of attorney) at the office of the Depository, or sent by mail to:

    Room 34/1/2/, Presnenskaya Naberezhnaya 8, bld. 1, Presnensky Municipal District, Moscow, 123112, Russian Federation

11. The applicant may also message the e-mail address: documents@rakursinvest.ru with scanned images of the prepared application and all supporting documents. The subject of the e-mail must contain the words “Forced conversion”. Receipt of this message is not a basis for conducting transactions and does not impose any obligations on Rakurs Invest JSC.