

Disclosure and Shareholder and Investor Relations

Information Policy

Transparency

is an underlying principle of the Company's corporate governance framework ensuring full, timely and accurate disclosure of the information on TransContainer's operations.

- protection of rights and legitimate interests of the Company's shareholders;
- full, timely and unbiased disclosure of reliable information about TransContainer sufficient for the shareholders, potential investors and other stakeholders to make investment and management decisions related to their participation in the Company;
- compliance with the Russian laws and requirements set by the stock exchanges where the Company's securities are traded.

The Company's information policy seeks to ensure:

Key Principles of the Information Policy

Regularity	Timely disclosure through coordination of work performed by respective functions.
Consistency	Simultaneous and equivalent disclosure of significant information in Russia and abroad given that the Company's securities are traded on the Moscow and London stock exchanges.
Promptness	Prompt communication of its official position with respect to any rumours or speculations creating a misleading view of the Company's valuation and the price of its securities.
	Prompt disclosure of information that could significantly affect the Company's valuation and the price of its securities.
Accessibility	Use of disclosure channels and methods available to most stakeholders. Free and unhindered access of stakeholders to the information disclosed by the Company.
Completeness	Disclosure of transparent, consistent and comparable information.
Reliability	Provision of reliable and balanced information without evading from disclosing negative facts that are material for shareholders and investors.
Comparability	
Neutrality	
	Disclosure of neutral disclosed information (financial and other) independent of any stakeholders' interests.

With regard to disclosure, the Company complies with the requirements of the Federal Law On Joint-Stock Companies and the Bank of Russia, applicable regulations of the Financial Conduct Authority (FCA), and all relevant rules of the Russian and UK stock exchanges. The Company is also guided by the principles of the Corporate Governance Code approved by the Bank of Russia on 21 March 2014, and the ESG Reporting Guidance (environmental, social, and governance factors) of the London Stock Exchange.

The Company has adopted documents¹ aimed at protecting the rights and interests of the Company's shareholders in transactions involving the Company's securities, as well as preventing and combating the illegal use of insider information. The Company regularly implements a range of measures for keeping and updating the insider list. Compliance with insider information requirements is checked by the insider information expert who reports to the Board of Directors.

While granting its stakeholders extensive rights to obtain information on the Company's activities, TransContainer protects its own interests restricting access to insider and confidential information, including commercial information or other classified data protected by law.

1. These documents are available on the Company's website: <https://trcont.com/investor-relations/charter-and-bylaws/bylaws>.

The Company actively engages with the media, while also leveraging all available information channels, including electronic disclosure systems www.e-disclosure.ru (Russia) и www.hemscott.com/nsm.do (the UK). All material information is available on the Company's website (www.trcont.com), including investor presentations and news releases on operating and financial results, and other important corporate developments. The Company's corporate website offers prompt updates for investors and additional means of communication to reach out to stakeholders, including hotlines and the feedback system.

In 2018, the Company continued webcasting general meetings of shareholders.

Along with transparency, the Company focuses on maintaining an ongoing dialogue with institutional investors and financial analysts to obtain feedback from the investment community. The Company takes part in investor conferences and forums hosted by the Moscow Exchange, London Stock Exchange, and Russian and international banks and companies. Financial disclosures are followed by conference calls with research analysts and investors held by the Company's management on a quarterly basis.

The Board of Directors oversees timely disclosure of reliable information on all material aspects of the Company's business, including financial and operating results, share capital structure, lists of the Company's affiliates, statements of material facts and other information in accordance with the laws of the Russian Federation and the United Kingdom.

The Company's Corporate Secretary contributes to the implementation of the Company's information disclosure policy, takes part in developing, introducing and updating of the Company's information policy, and submits a report on compliance with the same to the Board of Directors.

The Board of Directors meeting held on 12 April 2018 (Minutes No. 10) concluded that the Company complied with the procedure and timelines for compulsory disclosure established by the Russian laws, while also honouring voluntary disclosure obligations set out in its Regulation on Information Policy.

Quality of Information Disclosure in the Company's Annual Report

The quality of disclosure in TransContainer's annual reports is traditionally praised by Russian and international experts.

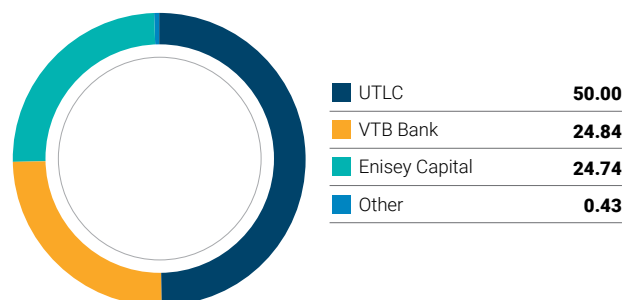
1. Since 2013, TransContainer's Annual Report is a prize-winner of the Moscow Exchange Annual Report Competition among the companies with a market cap of RUB 40-200 billion. The Company's Annual Report entered the Top 10 in this category in 2018.
2. TransContainer's Annual Report takes a strong position among the Best Annual Reports with a rating of "B+" according to ReportWatch (the fourth position out of ten).
3. In 2018, TransContainer's Annual Report for 2017 won nine prizes in LACP Awards (in comparison to four prizes year-on-year), including the Gold Award in the category Best Annual

Report in the Transportation Industry among the companies with a market cap over USD 1 billion, the Gold Award in the Best Annual Integrated Reports among the companies with a market cap of USD 1-10 billion, and a special prize of Technical Achievement Award. For the first time, the Company's Annual Report won bronze in Most Improved Report category, entered the Top 30 Best Integrated Reports of Europe, the Middle East and Africa, the Top-100 World's Best Integrated Reports and the Top 20 Russian Best Integrated Reports.

4. TransContainer became a prize-winner of ARC Awards 2018 for annual Reports among the Logistics Companies.

Share Capital and Securities (%)

Shareholding Structure¹



Ordinary Registered Shares

TransContainer's charter capital is RUB 13,894,778,000 divided into 13,894,778 ordinary registered shares with a par value of RUB 1,000.

Information about Each Category (Type) of Shares

Share type and category	Ordinary registered shares
Form of issuance	Uncertificated
Number of shares outstanding	13,894,778
Par value of one security, RUB	1,000
State registration of the securities issue	1-01-55194-E of 11 May 2006.

As at 31 December 2018, the Company's ordinary registered shares were admitted to trading on the Moscow Exchange (MOEX) top Level 3 list, ticker: TRCN.

Since 18 June 2018, Company's shares were transferred from Level 1 to Level 3 of securities admitted to trading on the Moscow Exchange by resolution of the Chairman of the Board of Moscow Exchange due to the Company's failure to eliminate the violation within the time period established by the Exchange (non-observance of corporate governance requirements, in particular, the reduction of number of independent directors in the Board of Directors).

1. As per TransContainer's share register as at 30 November 2018, its equity is based on long-term investments. These data reflect the information available to the Company based on the share register maintained by the Company's registrar, and information publicly disclosed by the Company's shareholders.