

# **Regulations for assuming direct ownership of shares of PJSC EVRAZ NTMK**

## **REGULATIONS FOR ASSUMING DIRECT OWNERSHIP OF SHARES PJSC EVRAZ NTMK<sup>1</sup>**

These Regulations for assuming direct ownership of shares in PJSC EVRAZ NTMK (hereinafter referred to as the "**Regulations**" and "**NTMK**", respectively) are approved by PJSC EVRAZ NTMK pursuant to:

- ✓ Federal Law No. 470-FZ dated August 4, 2023, "On the Features of the regulation of corporate relations in business entities that are economically significant organizations" (hereinafter referred to as the "**Law**"); and
- ✓ The decision in case No. A41-49916/25 by the Arbitration Court of the Moscow Region dated July 22, 2025.

The Regulations are meant to be used by any person<sup>2</sup>, who/which holds shares in EVRAZ plc whether directly or indirectly (registration number: 07784342) (hereinafter referred to as "**EVRAZ plc**" and "**EVRAZ plc shares**", respectively) for the purpose of obtaining direct ownership of shares in PJSC EVRAZ NTMK.

### **IMPORTANT INFORMATION:**

- 1) Persons indirectly owning NTMK shares who are **citizens** and/or **residents of the Russian Federation**<sup>3</sup>, are **obligated to assume** direct possession of the shares of NTMK shares.
- 2) Persons indirectly owning NTMK shares who are **not** citizens and/or **residents of the Russian Federation** **are entitled** to assume direct ownership of NTMK shares.
- 3) Persons specified in 1) and 2) (hereinafter referred to as the "**Applicants**") receive NTMK shares proportionally to their shareholding in EVRAZ plc, with a conversion factor of 2.68299312073399. That is, for each EVRAZ plc share, the Applicant receives 2.68299312073399 NTMK shares. If multiplying EVRAZ plc shares by the specified factor yields a fractional value, the rounding off rule to the nearest integer is used, where 0.5 is rounded up.
- 4) To obtain direct ownership of NTMK shares, **an application and a set of documents must be submitted** in accordance herewith. The list of documents may vary based on whether:
  - a. The Applicant is:
    - i. an individual or
    - ii. a legal entity; and
  - b. The Applicant is:

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<sup>1</sup> Renamed from JSC "EVRAZ NTMK" on August 19, 2025 by virtue of Article 9 of the Law

<sup>2</sup> For the definition of such persons, see Section 1 of the Regulations ("Persons indirectly owning NTMK shares for the purposes of the Law")

<sup>3</sup> For the definition of such persons, see Federal Law No. 173-FZ of December 10, 2003 "On Currency Regulation and Currency Control"

- i. A share certificate holder of EVRAZ plc shares (hereinafter **“certificate holder”**);
  - ii. An owner of EVRAZ plc shares recorded in the Russian infrastructure (rights to EVRAZ plc shares are recorded in Russian depositories through the National Settlement Depository); or
  - iii. An owner of EVRAZ plc shares recorded in foreign infrastructure (rights to EVRAZ plc shares are recorded in foreign organizations outside the Russian Federation).
- 5) Applicants who have deemed interest in NTMK shares but not being shareholders of EVRAZ plc (i.e., not being direct owners of EVRAZ plc shares, according to the EVRAZ plc shareholder register) must follow the procedures set out herein for certificate holders, owners of EVRAZ plc shares recorded in Russian infrastructure, or owners of EVRAZ plc shares recorded in foreign infrastructure, depending on the location (method) of recording rights to EVRAZ plc shares, in respect of which the Applicants are recognized as persons who have deemed interest in NTMK shares.

**DEPENDING ON HOW THE APPLICANT HOLDS EVRAZ PLC SHARES, THE PROCEDURE FOR SUBMITTING THE APPLICATION AND DOCUMENTS VARIES**

**IF THE APPLICANT QUALIFIES UNDER MULTIPLE CATEGORIES—FOR EXAMPLE, IF THE APPLICANT IS BOTH A CERTIFICATE HOLDER AND AN OWNER OF EVRAZ PLC SHARES RECORDED IN RUSSIAN OR FOREIGN INFRASTRUCTURE, 2 (OR MORE) SEPARATE APPLICATIONS MUST BE COMPLETED. EACH OF THOSE MUST BE SUBMITTED IN ACCORDANCE WITH THE PROCEDURE SET OUT HEREIN FOR THE RELEVANT CATEGORY.**

- 6) If, as a result of the consideration of the application, the Applicant obtains direct ownership of NTMK shares, this does not entail the automatic cancellation and/or termination of the Applicant's rights to EVRAZ plc shares. However, the share of EVRAZ plc in the authorized capital of NTMK will decrease due to the NTMK shares that the Applicants obtain directly.
- 7) Each Applicant must independently:
- a. Assess all economic, legal, and other consequences of obtaining direct ownership of NTMK shares;
  - b. Obtain all necessary approvals and permits required by the law of the Russian Federation and any other applicable foreign law; and
  - c. Independently obtain all necessary legal, investment, and other consultations required for the Applicant to decide whether to obtain direct ownership of NTMK shares and/or to acquire direct ownership of NTMK shares.
- 8) Applicants who choose to obtain direct ownership of NTMK shares are requested to submit the application and documentary evidence in the manner described in Sections 3 and 4 hereof:
- a. If the Applicant is an **owner of EVRAZ plc shares recorded in the**

**Russian infrastructure** (rights to EVRAZ plc shares are recorded in Russian depositories through the National Settlement Depository), the application and the documentary evidence must be forwarded (submitted) by the Applicant in hard copy (or, in cases where the Regulations allow for certain types of documents, in soft copies signed with an enhanced qualified electronic signature, on electronic media) to: **JSC "IRC - R.O.S.T.", 18 building 5B ul. Stromynka, 107076 Moscow.**

- b. If the Applicant is a **certificate holder** or an **owner of EVRAZ plc shares recorded in foreign infrastructure** (rights to EVRAZ plc shares are recorded in foreign organizations outside the Russian Federation), the application and the documentary evidence must be sent by the Applicant:
  - i. First as scanned documents to [ESO.Request@evraz.ru](mailto:ESO.Request@evraz.ru); and
  - ii. Only after the confirmation from NTMK, the application and the documentary evidence must be sent in hard copy by mail to: JSC IRC - R.O.S.T., 18 building 5B ul. Stromynka, 107076 Moscow.

THE INFORMATION PROVIDED HEREIN IS FOR REFERENCE ONLY AND WILL NOT CONSTITUTE INVESTMENT, LEGAL, OR ANY OTHER TYPE OF ADVICE OR RECOMMENDATION AND/OR CONSULTATION. SIMILARLY, THESE REGULATIONS DO NOT PROVIDE ANY INSTRUCTIONS OR SUGGESTIONS (REGARDLESS OF WHETHER ADDITIONAL NOTIFICATION IS REQUIRED) FOR YOU OR ANY OTHER PERSON TO TAKE ANY ACTION OR SEQUENCE OF ACTIONS, OR TO REFRAIN FROM TAKING ANY ACTION OR SEQUENCE OF ACTIONS, OR TO NOT TAKE THEM. THE USE OF THIS DOCUMENT, AS WELL AS THE DECISION TO ACT OR NOT TO ACT, INCLUDING IN RELATION TO FAMILIARITY WITH THESE RULES, IS ENTIRELY AT YOUR DISCRETION, WITH THE UNDERSTANDING THAT YOU OR ANY OTHER PERSON ASSUMES THE ASSOCIATED RISKS, INCLUDING THE RISK OF INCURRING LOSSES, SUCH AS LOST PROFITS, FINANCIAL LOSSES, AND/OR OTHER LOSSES RESULTING FROM THEIR ACTIONS OR INACTIONS. IN THE EVENT OF QUESTIONS REGARDING THE APPLICATION OF THESE REGULATIONS, INDIVIDUAL PROVISIONS OF THE LAW OR OTHER LEGAL ACTS, YOU SHOULD SEEK INDEPENDENT LEGAL, FINANCIAL AND/OR OTHER CONSULTATION.

IN NO EVENT SHALL ANY INTERACTION (IN ANY FORM) REGARDING THE APPLICATION, INTERPRETATION OF THESE REGULATIONS, OR THE PERFORMANCE OF ACTIONS PROVIDED FOR HEREIN—WHETHER BETWEEN YOU AND/OR ANY OTHER PERSON WITH NTMK, AND/OR ANY REPRESENTATIVE OF NTMK, AND/OR ANY OTHER PERSON ENGAGED BY NTMK TO PERFORM SUCH ACTIONS—BE CONSTRUED AS ADVICE OR A RECOMMENDATION, REGARDLESS OF WHETHER A SEPARATE NOTICE TO THIS EFFECT IS PROVIDED OR WHETHER THE WORDS "RECOMMENDATION," "RECOMMENDED," OR ANY OTHER SIMILAR TERMS (INCLUDING BY MEANING) ARE USED DURING SUCH INTERACTION.

YOU NEED TO BE AWARE THAT EVERY ACTION YOU TAKE, INCLUDING SUBMITTING THE DOCUMENTS, THEY ARE PROCESSED AND REVIEWED ON A CASE-BY-CASE BASIS THAT MAY TAKE A SPECIFIC AMOUNT OF TIME AND MORE DOCUMENTS AND/OR INFORMATION MAY BE REQUESTED SO IT MAY TAKE LONGER TO PROCESS AND REVIEW THEM. IF ADDITIONAL DOCUMENTS ARE SUBMITTED, THE ENTIRE SET OF DOCUMENTS WILL HAVE TO BE REVIEWED ANEW FROM THE START. THE APPLICANT IS SOLELY RESPONSIBLE FOR DETERMINING THE LIST OF DOCUMENTS CONTAINING THE INFORMATION REQUIRED TO OBTAIN SHARES IN NTMK, AS WELL AS THE METHOD OF THEIR SUBMISSION, IN ACCORDANCE WITH THE REQUIREMENTS OF THE LAW OF THE RUSSIAN FEDERATION. THE APPLICANT ALSO BEARS THE RISK OF THE COMPLETENESS, SUFFICIENCY, AND TIMELINESS OF THEIR SUBMISSION, AND ANY CONSEQUENCES ARISING THEREFROM.

NTMK IS NOT OBLIGATED TO REVIEW DOCUMENTS SUBMITTED IN ANY LANGUAGE OTHER THAN RUSSIAN, NOR TO BEAR THE COSTS OF THEIR TRANSLATION.

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1. **PERSONS INDIRECTLY OWNING NTMK SHARES FOR THE PURPOSES OF THE LAW**

Persons indirectly owning NTMK shares for the purposes of the Law include:

shareholders of EVRAZ plc;

owners of securities of foreign exchange-traded investment funds (hereinafter referred to as "**Unit holders**") whose assets include EVRAZ plc shares;

persons who decide what the shareholders or unit holders of EVRAZ plc should do;

entities that either directly or indirectly affect the decisions made by Evraz plc's shareholders or unit holders through the persons listed in item 3) above;

shareholders (participants) of EVRAZ plc shareholders and Unit Holders, except for the persons specified in item 3 above;

persons influencing the actions of the person specified in item 5 above;

entities that either directly or indirectly affect the decisions made by a shareholder (participant) of EVRAZ plc's shareholders and by the Unit holders through the persons listed in item 6) above;

shareholders (participants) of the entities specified in 4) and 7) above;

beneficiaries, founders, participants of foreign structures without forming a legal entity (trusts, personal funds, etc.) that are the entities specified in 3) to 8) above.

beneficial owners of NTMK.

The full definition of persons indirectly owning NTMK shares for the purposes of the Law is provided in Part 2, Article 7 of the Law.

2. **DEADLINE AND OBLIGATIONS TO OBTAIN DIRECT OWNERSHIP OF NTMK SHARES FOR A PERSON WHO ARE A CITIZEN OR A RESIDENT OF THE RUSSIAN FEDERATION.**

If the Applicant is a person indirectly owning NTMK shares for the purposes of the Law as of July 22, 2025, while being a citizen and/or resident of the Russian Federation, then:

They **are obligated to** assume direct ownership of NTMK shares as of July 22, 2025;

The Applicant may transfer the right to obtain direct ownership of NTMK shares to a citizen of the Russian Federation or a Russian legal entity. In this case, such a person becomes a shareholder of NTMK;

The application containing the information necessary for obtaining direct ownership of NTMK shares must be submitted within **3 (three)** months from August 20, 2025, i.e., until November 24, 2025.

The website's publishing date serves as a notification from NTMK to Evraz Plc shareholders in accordance with Part 3 of Article 7 of the Law since NTMK have no knowledge of the makeup of Evraz Plc's shareholders.

More detailed information on the procedure for submitting the application is provided in Section 4 below.

### **3. DEADLINE AND OBLIGATIONS TO OBTAIN DIRECT OWNERSHIP OF NTMK SHARES FOR A PERSON WHO IS A NON-CITIZEN AND/OR A NON-RESIDENT OF THE RUSSIAN FEDERATION.**

If the Applicant is a person indirectly owning NTMK shares for the purposes of the Law as of July 22, 2025, while being a **non-citizen** and/or **non-resident** of the Russian Federation, then:

They **are eligible to** assume direct ownership of NTMK shares as of July 22, 2025;

The Applicant may transfer the right to obtain direct ownership of NTMK shares to a citizen of the Russian Federation or a Russian legal entity. In this case, such a person becomes a shareholder of NTMK;

The application containing the information necessary for obtaining direct ownership of NTMK shares must be submitted within 4 (four) months from July 22, 2025, i.e., until November 24, 2025.

More detailed information on the procedure for submitting the application is provided in Section 4 below.

## **4. PROCEDURE FOR ASSUMING DIRECT OWNERSHIP OF SHARES**

### **4.1 Submission of the Application**

To obtain direct ownership of NTMK shares, the Applicant or a person authorized to act on behalf of the Applicant must submit an application containing the information necessary for obtaining direct ownership of NTMK shares (hereinafter referred to as the "**Application**") and the documentary evidence.

### **4.2 Where to submit the Application**

- 1) The Application and the documentary evidence (including the filled-out and signed consent to the processing of personal data, if the Applicant or the person authorized to act on their behalf is an individual) must be submitted as follows:
  - a. If the Applicant is an owner of EVRAZ plc shares recorded in the Russian infrastructure (rights to EVRAZ plc shares are recorded in Russian depositories through the National Settlement Depository), the



Application and documentary evidence (including the completed and signed consent to the processing of personal data, if the Applicant or the person authorized to act on their behalf is an individual) must be submitted in hard copy (or, in cases where the Regulations allow for certain types of documents, in soft copy signed with an enhanced qualified electronic signature, on electronic media) by one of the methods specified below to Joint Stock Company "Independent Registrar Company R.O.S.T." (hereinafter referred to as "IRC - R.O.S.T."), which is the keeper of the register of securities holders (shareholder register) of NTMK and which NTMK has engaged to receive Applications. It is not necessary in this case to email the Draft application (as defined below) and scanned copies of the documentary evidence beforehand; the email-sent Draft Application and scanned copies of the documentary evidence will not be taken into consideration.

Methods for forwarding (submitting) applications with the documentary evidence to IRC - R.O.S.T.:

- i. sending by mail to the postal address of IRC - R.O.S.T. at: 18 building 5B ul. Stromynka, 107076 Moscow; or
- ii. Physical delivery by the Applicant or a person authorized to act on their behalf at the IRC - R.O.S.T. office located at: 18 building 5B ul. Stromynka, 107076 Moscow on business days from Monday through Thursday from 10:00 a.m. to 04:30 p.m., and on Friday from 10:00 a.m. to 03:30 p.m.

Applications and documentary evidence are deemed to have been received by NTMK on the day of their actual receipt by IRC - R.O.S.T. using one of the above methods.

- b. In all other cases, the Draft of the filled-out application (hereinafter referred to as the "Draft Application") and scanned copies of the documentary evidence in Russian (including the completed and signed consent to the processing of personal data, if the Applicant is an individual) must first be sent to the email address [ESO.Request@evraz.ru](mailto:ESO.Request@evraz.ru). **NTMK may request additional materials and/or data following their examination.**

After receiving a message from NTMK's email address [ESO.Request@evraz.ru](mailto:ESO.Request@evraz.ru) **confirming the possibility of sending the Application and the documentary evidence in hard copy**, the filled-out and signed Application, as well as the documentary evidence, scanned copies of which were previously sent via email, must be sent in hard copy by mail to the postal address of IRC - R.O.S.T.: 18 building 5B ul. Stromynka, 107076 Moscow.

The Application and the documentary evidence in hard copy sent by mail to the postal address of IRC - R.O.S.T. must be identical to those that were previously e-mailed as the Draft application and scanned copies of the documentary evidence. If this requirement is failed, all adverse consequences (including, but not limited to, failure to obtain direct ownership of NTMK shares) shall be borne by the Applicant or the person to whom the Applicant has transferred the right to obtain direct ownership of NTMK shares, and NTMK and IRC - R.O.S.T. shall not assume or bear any responsibility for such adverse consequences.

Application and documentary evidence mailed in hard copy to the postal address of IRC - R.O.S.T. are deemed to have been received by NTMK on the day that IRC - R.O.S.T. actually receives them.

- 2) Given the time required for: (a) reviewing the Draft application and scanned copies of the documentary evidence submitted via email; (b) requesting and receiving additional documents and/or information from Applicants as a result of such review, and (c) delivering hard-copy documents, **the Applicants required to submit a Draft application hereunder are strongly advised to send the Draft application and scanned copies of the documentary evidence via email well in advance—at least one and a half to two months before the deadlines** specified in Sections 2 and 3 hereof.

- 3) For any questions regarding the completion of the Application and/or documentary evidence, please contact:

- via e-mail at [NTMK@rost.ru](mailto:NTMK@rost.ru); or

- by phone number 8 800 200 80 72

(only in Russian).

Only inquiries pertaining to the completion of the application or the submission of the documentary evidence in line herewith may be sent using the contact information above. Responses received via the above contact details, regardless of their literal content, will not constitute investment, legal, tax, or any other form of advice or recommendation. Nor will they be deemed as preliminary or final confirmation (obligation or guarantee) that the Applicant or any other person will receive direct ownership of any NTMK shares.

- 4) **If the Applicant qualifies under multiple categories—for example, if the Applicant is both a certificate holder and an owner of Evraz plc shares recorded in Russian or foreign infrastructure 2 (or more) separate Applications must be completed. Each of those must be submitted in accordance with the procedure set out herein for the relevant category.**

### 4.3 Documentary evidence

An indicative list of documentary evidence is contained in Appendices 1–4 hereto. To dispel any doubts, the provided list of documentary evidence is not exhaustive; the Applicant may submit any other documents and information that they believe are required to obtain direct ownership of NTMK shares in compliance with the law of the Russian Federation.

**If any of the documents cannot be provided, this circumstance must be noted in the Application with an explanation of the reasons and, if possible, with the attachment of the documentary evidence thereof.**

### 4.4 General requirements to the documentary evidence<sup>4</sup>

- 1) If a document is issued in a foreign state and/or by a foreign person, such a document must be legalized or apostilled, unless otherwise provided by international treaties of the Russian Federation. **If this requirement cannot be fulfilled, it must be noted in the Application with an explanation of the reasons.**
- 2) If a document is written in a foreign language, its translation into Russian must also be attached. The translation into Russian must be validated by the translator's signature, and the authenticity of the translator's signature must be notarized (hereinafter referred to as "**notarized translation**").
- 3) If a document is submitted as a copy rather than the original, the authenticity of the copy must be notarized (hereinafter referred to as "**notarized copy**"). **If a notarized copy is not available, it must be noted in the Application with an explanation of the reasons.** The Application itself must be submitted only in the original (not as a copy).
- 4) If the Regulations, including appendices hereto, state that a power of attorney, another document, a copy of a document, or a signature must be certified (attested, notarized) by a notary, such certification (attestation, notarization) may be performed by a Russian notary (or another person authorized to perform the corresponding notarial action under the law of the Russian Federation) or by a foreign notary (or another foreign person authorized under their personal law to certify a document, attest the authenticity of a signature, etc. in the relevant foreign jurisdiction) (hereinafter referred to as "**foreign notary**").

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<sup>4</sup>The general requirements apply to all documents, unless a specific requirement regarding the form of a document is set out in Appendices 1–4, in which case the specific requirement shall take precedence.

These Regulations along with the appendices hereto, may stipulate that only a Russian notary may certify a copy's accuracy for specific kinds of documents. **If any of these requirements cannot be fulfilled, it must be noted in the Application with an explanation of the reasons.**

- 5) Paper documents made of several sheets, whether originals or copies, must be stitched and certified/signed at the stitching point by the same individual who certified/signed the original or copy.
- 6) If a document's form or content is subject to particular requirements outlined in these Regulations, including its appendices, those criteria must be met; **and if they cannot, this must be noted in the Application with an explanation of the reasons.**

#### 4.5 **Grounds for denying to give direct ownership of NTMK shares**

Grounds for denying to give direct ownership of NTMK shares are as follows:

- 1) submitted application/documentary evidence are incomplete or the submitted application/documentary evidence fail the established requirements;
- 2) submitted application/documentary evidence contain misrepresentations;
- 3) someone else listed in Part 1, Article 7 of the Law has exercised the right to directly possess NTMK shares, for which the application is submitted; and/or
- 4) an unauthorized individual signed the application and submitted the documentary evidence.

#### 4.6 **Opening an Account for keeping record of ownership of NTMK shares**

- 1) NTMK has signed an agreement with JSC IRC - R.O.S.T. for keeping the register of NTMK shareholders.
- 2) If NTMK decides to list the Applicant (or the person to whom the Applicant has transferred the right to obtain direct ownership of NTMK shares, hereinafter referred to as the "**New owner**") with the persons obtaining direct ownership of NTMK shares, NTMK will take the necessary actions to transfer NTMK shares to the Applicant (New owner) by transferring them to an account intended for keeping record of the Applicant's (New Owner's) ownership of NTMK shares (hereinafter referred to as the "**Applicant's (New owner's) Account**"), which must be specified by the Applicant thereto (and in the Application as well). The Applicant's (New Owner's) account may be opened in the register of NTMK shareholders kept by JSC IRC - R.O.S.T. or in any Russian depository, at the choice of the Applicant (New Owner).

- 3) Please be aware that it may take a long while to open the applicant's (New owner's) account as the case may be. If NTMK decides to list the Applicant (New owner) with the persons obtaining direct ownership of NTMK shares, NTMK will not be able to take the required steps to transfer NTMK shares to the Applicant (New owner) until NTMK receives the details of the Applicant's (New owner's) account. Furthermore, if, after NTMK decides to list the Applicant (New owner) with the persons obtaining direct ownership of NTMK shares, but before NTMK receives the details of the Applicant's (New owner's) account, EVRAZ plc applies to NTMK with a demand for compensation in the amount of the market value of NTMK shares that were not distributed among the persons obtaining direct ownership of the corresponding NTMK shares, it cannot be ruled out that NTMK will no longer be able to transfer NTMK shares to the Applicant (New owner).
- 4) If the Applicant (New Owner) intends for the NTMK shares, which they are taking direct ownership of, to be transferred to their depository account opened in any Russian depository, then the Applicant (New owner) must independently contact the Russian depository of their choice and complete all procedures required to open a depository account before the application is submitted.
- 5) In some cases, to transfer shares to the depository account of the Applicant (New owner) opened in a Russian depository, it may be necessary to specify certain information, including a unique identification number (hereinafter referred to as the "**Reference**") and the settlement date (hereinafter referred to as the "**Settlement Date**") in the instructions for performing the relevant operations in the depository and in the register of NTMK shareholders.
- 6) Information about the Reference and Settlement Date to be specified in such instructions will be sent from the email address of JSC IRC - R.O.S.T., [NTMK@rrost.ru](mailto:NTMK@rrost.ru) to the email address specified in the Application of each Applicant (New owner) in respect of whom NTMK decides to list with the persons obtaining direct ownership of NTMK shares, between November 25 and December 1, 2025 (inclusive of both dates).
- 7) The Applicant (New Owner) who receives a letter with the Reference and Settlement Date at their email address must provide this information to the Russian depository where the Applicant's (New Owner's) depository account is opened for the crediting of NTMK shares.
- 8) If, after December 1, 2025, the Applicant (New owner) does not receive a letter with the Reference and Settlement Date at their email address, they must promptly contact JSC IRC-R.O.S.T. at the contact details below by December 4, 2025 at the latest, for the information about the Reference and Settlement Date or to find out why they did not receive it: [NTMK@rrost.ru](mailto:NTMK@rrost.ru).

- 9) Operations to transfer NTMK shares to the Applicant's (New owner) depository account in the Russian depository may be delayed or rendered impossible if the Reference and Settlement Date, which were sent to the Applicant (New owner) in the manner mentioned above, are not provided in the depository's instructions or if the Applicant (New owner) does not take the necessary actions to receive the Reference and Settlement Date.
- 10) If the Applicant (New Owner) intends for the NTMK shares, which they are taking direct ownership of, to be transferred to their personal account in the register of NTMK shareholders, the Applicant (New owner) is recommended to contact JSC IRC - R.O.S.T. in advance to open such a personal account and to submit to JSC IRC - R.O.S.T. the documents necessary for opening such a personal account. In particular, the documents required for opening a personal account of the Applicant (New owner) in the register of NTMK shareholders may be submitted to JSC IRC - R.O.S.T. before submitting the Application.

**APPENDIX 1**  
**DOCUMENTARY EVIDENCE**

1. Documents evidencing the validity and legitimacy of the Applicant's interest and other circumstances specified in clause 2, part 5, article 7 of the Law:

**1) If the Applicant is a shareholder of EVRAZ plc, the following documents are submitted:**

**Depending on whether the Applicant is an individual (Appendix 2) or a legal entity (Appendix 3), as well as:**

**1.1. If submitted by a shareholder of EVRAZ plc who is a holder of a certificate of EVRAZ plc shares ("certificate holder"):**

- a. Certificate of EVRAZ plc shares;

Form	Legalization / Apostille	Translation
Copy	not required	Notarized translation required (translation template attached)

- b. if the date of issue of the certificate of EVRAZ plc shares is indicated as August 5, 2022, or later, but the Applicant acquired these EVRAZ plc shares before August 5, 2022, and the Applicant's rights to these EVRAZ plc shares were recorded in the Russian or foreign infrastructure before the certificate of EVRAZ plc shares was issued to the Applicant, then additionally, the documents specified below in clause 1.2 or clause 1.3, respectively, are submitted for the period of at least from August 5, 2022, to the date of issue of the certificate of EVRAZ plc shares to the Applicant (inclusive of both dates).

**1.2. if submitted by a shareholder of EVRAZ plc who is *an owner of EVRAZ plc shares recorded in the Russian infrastructure (rights to EVRAZ plc shares are recorded in Russian depositories through the National Settlement Depository)*:**

- a. statement or other document(s) on the Applicant's depository account in the Russian infrastructure (hereinafter referred to as the "**Russian statement**"), on which the Applicant's rights as the owner of the corresponding number of EVRAZ plc shares are recorded, issued by the Russian depository keeping such depository account of the Applicant (hereinafter referred to as the "**Russian Depository**") and confirming that: **(1)** The Applicant was the owner of the corresponding number of EVRAZ plc shares as of July 22, 2025\* ; and **(2)** The Applicant was the owner of the corresponding number of EVRAZ plc shares as of August 5, 2022 or earlier;

\*If the Russian depository has discontinued the record of rights to Evraz plc shares (the Evraz Plc shares have been written off from the depository account), for which the Application is being submitted, solely because EUROCLEAR BANK S.A./N.V. ceased to keep records of Evraz plc shares in the accounts of Russian depositories (including in the account of the National Settlement Depository (NSD)) opened with EUROCLEAR BANK S.A./N.V. due to the sanctions imposed, and the Applicant has not engaged into any transactions (operations) intended to alienate these Evraz plc shares, then the Applicant must, instead of the above-mentioned Russian statement, submit a letter from the relevant Russian depository outlining the recording issues or any other similar document.

Form	Legalization / Apostille	Translation
Original paper document signed by an authorized person of the Russian Depository; or  notarized copy thereof; or  document signed with an enhanced qualified electronic signature of an authorized person of the Russian Depository, on electronic media (memory stick)	Not required (the document must be drawn up in the Russian Federation, and if a copy is submitted, the authenticity of the copy must be certified by a Russian notary)	Not required (the document must be drawn up in Russian)

- b. Depository agreement which allows them to open a depository account in the Russian depository. The account keeps record of the Applicant's ownership rights to EVRAZ plc shares, and a Russian statement is issued therefrom.

Form	Legalization / Apostille	Translation
Original paper document signed by an authorized person of the Russian Depository; or  notarized copy thereof; or  document signed with an enhanced qualified electronic signature of an authorized person of the Russian Depository, on electronic media (memory stick)	Not required (the document must be drawn up in the Russian Federation, and if a copy is submitted, the authenticity of the copy must be certified by a Russian notary)	Not required (the document must be drawn up in Russian)



- c. Other documents available under the circumstances and evidencing the continuous ownership by the Applicant of the corresponding number of EVRAZ plc shares for the period of at least from August 5, 2022 through July 22, 2025 (inclusive of both dates) and the Applicant's right to obtain direct ownership of NTMK shares.

**1.3. If the Applicant is a shareholder of EVRAZ plc who is an owner of EVRAZ plc shares recorded in foreign infrastructure (rights to EVRAZ plc shares are recorded in foreign organizations outside the Russian Federation):**

- a. Statement or other document(s) of the securities account in the foreign infrastructure (hereinafter referred to as the "**Foreign Statement**"), which keeps record of the Applicant's ownership rights to the corresponding number of EVRAZ plc shares, issued by the foreign entity keeping such account (hereinafter referred to as the "**Foreign Depository**") and confirming that: **(1)** The Applicant was the owner of the corresponding number of EVRAZ plc shares as of July 22, 2025; and **(2)** The Applicant was the owner of the corresponding number of EVRAZ plc shares as of August 5, 2022 or earlier;

Form	Legalization / Apostille	Translation
Original paper document signed by an authorized person of the Foreign depository; or  notarized copy	Required if a copy notarized outside the Russian Federation by a foreign notary is submitted	Notarized translation required if the document is drawn up in a foreign language.

- b. Documents attesting to the authority of the signer of the Foreign Statement or of other supporting document stipulated herein on behalf of the Foreign Depository;

- c. A notarial inspection record of the client's personal profile opened with the foreign depository must be provided if the foreign statement or the signature of an authorized foreign depository representative are unavailable. Such record must contain information confirming that: **(1)** The Applicant was the owner of the corresponding number of EVRAZ plc shares as of July 22, 2025; and **(2)** The Applicant was the owner of the corresponding number of EVRAZ plc shares as of August 5, 2022 or earlier;

Form	Legalization / Apostille	Translation
Notarized document	Not required if the inspection was carried out by a Russian notary.  Required if the inspection was carried out by a foreign notary	Notarized translation required if the document is drawn up in a foreign language.

- d. Agreement between the Applicant and the Foreign depository, which serves as the foundation for keeping an Applicant's depository account with the Foreign depository. The account keeps record of the Applicant's ownership rights to EVRAZ plc shares, and a Foreign statement of the account is issued.

Form	Legalization / Apostille	Translation
Copy of the document on paper attested by the signature of an authorized person of the Foreign depository; or  notarized copy	Required if a copy notarized by a foreign notary is submitted	Notarized translation required if the document is drawn up in a foreign language.

- e. Other documents available under the circumstances and evidencing the continuous ownership by the Applicant of the corresponding number of EVRAZ plc shares for the period of at least from August 5, 2022 through July 22, 2025 (inclusive of both dates) and the Applicant's right to obtain direct ownership of NTMK shares.
- f. Other documents available under the circumstances and evidencing the foreign nominee holder which keeps the record of the Applicant's ownership rights to EVRAZ plc shares, and the higher-level nominee holders (foreign nominee holders).

Such document will be a confirmation letter from the foreign depository listing all the entities that are part of the chain that keeps records of the EVRAZ plc shares owned by the Applicant all the way up to the EVRAZ plc shareholders' register.

If the Foreign depository refuses to issue a confirmation letter to the Applicant, such document will be a description, drawn up by the Applicant in arbitrary form, of the chain that keeps record of EVRAZ plc shares owned by the Applicant, listing all the entities that are part of the chain that keeps records of such shares all the way up to the EVRAZ plc shareholders' register (to the extent such information is available to the Applicant).

Form	Legalization / Apostille	Translation
Original paper document signed by an authorized person of the Foreign depository (if a confirmation letter from the Foreign Depository is submitted); or	Required if a notarized copy certified outside the Russian Federation by a foreign notary is submitted, and/or the signature on the document is attested by a foreign notary.	Notarized translation required if the document is drawn up in a foreign language.
Notarized copy of the confirmation letter from the Foreign Depository; or	Otherwise, not required	
Original paper document signed by the Applicant or their authorized representative (if a description of the chain of EVRAZ plc shares records drawn up by the Applicant is submitted).		

**g.** Further, for each entity involved in the chain of recording EVRAZ plc shares owned by the Applicant and indicated in the document submitted in accordance with subclause f above, the following documents must be submitted:

- (i) a printout of the webpage of each such entity providing the details of the entity's activities in keeping record of rights to securities; and
- (ii) a printout of the homepage of the body regulating the activities of such entity in keeping record of rights to securities, stating that such entity enjoys a right to keep record of rights to securities.

Each of these printouts must be made after July 22, 2025, and must include the complete URL of the relevant webpage.

Form	Legalization / Apostille	Translation
Printout on paper certified by the Applicant or their authorized person	Not required, except in cases where the signature of the Applicant or their authorized person on the printout is certified by a foreign notary	Notarized translation required if the document is drawn up in a foreign language.

***2) In the event that the applicants are any of the other persons listed in Section 1 hereof ("Persons indirectly owning NTMK shares for the purposes of the Law"), who are not shareholders of EVRAZ plc (i.e., do not directly own EVRAZ plc shares) but who have the right or obligation to obtain direct ownership of NTMK shares, they submit:***

- a. documents pertaining to the ultimate beneficiary – an individual (APPENDIX 2);
- b. documents pertaining to each legal entity (or a structure without forming a legal entity: trust, personal fund, etc.) involved in the chain of entities and/or structures without forming a legal entity, through which the ultimate beneficiary indirectly owns NTMK shares (APPENDIX 3);
- c. documents evidencing the status of the ultimate beneficiary – an individual in relation to the submitted chain of entities and/or structures without forming a legal entity (including the documentary evidence of the right of the ultimate beneficiary to decide what a shareholder of EVRAZ plc, a Unit holder, or their shareholders (participants)) do; and
- d. Documents under clauses 1.1–1.3 of this APPENDIX 1, depending on the place (method) of keeping records of rights to EVRAZ plc shares, in relation to which the Applicant is recognized as a person indirectly owning NTMK shares. The requirements for such documents are applicable, with the required modifications made to account for the unique circumstances of the Applicant, who does not directly own shares of EVRAZ plc. In particular, the documents for the account of another person who is the direct owner of the relevant EVRAZ plc shares are submitted rather than those related to the Applicant's account with the Russian Depository or foreign entity.

***3) Documents evidencing the receipt of necessary resolutions (permits) under Presidential Edict No. 520 dated August 5, 2022***

If the Applicant acquired rights (directly or indirectly) to EVRAZ plc shares on or after August 5, 2022, from a person who is not a resident of the Russian Federation, such Applicant must submit the corresponding special resolution (permit) as stipulated by Presidential Edict No. 520 dated August 5, 2022.

If the Applicant, a non-resident of the Russian Federation, acquired rights (directly or indirectly) to EVRAZ plc shares on or after August 5, 2022, from a person who is a resident of the Russian Federation, such Applicant must submit the corresponding special resolution (permit) as stipulated by Presidential Edict No. 520 dated August 5, 2022.

If the Applicant who is a resident of the Russian Federation acquired rights (directly or indirectly) to EVRAZ plc shares on or after August 5, 2022, from a person who is a resident of the Russian Federation, such Applicant must submit the corresponding documentary evidence of the acquisition of the shares from the resident of the Russian Federation.

## APPENDIX 2

### **THE FOLLOWING EXTRA DOCUMENTS MUST BE SUBMITTED IF THE APPLICANT IS AN INDIVIDUAL:**

#### **1. Identification documents of the Applicant**

A passport or other identity document of the Applicant in accordance with their personal law must be submitted.

If the Applicant presents their documents in person at the IRC-R.O.S.T. office, they must bring the original passport or other identity document, which an IRC-R.O.S.T. employee may make a copy of.

In all other cases (where the Application and the documentary evidence are mailed or delivered to the IRC-R.O.S.T. office by someone acting on the Applicant's behalf rather than the Applicant themselves), a notarized copy of the Applicant's passport or other identity document must be attached to the Application.

#### **2. Power of attorney or other document confirming the authority of the person acting on the Applicant's behalf to sign the Application and submit the Application and the documentary evidence (if a person other than the Applicant is acting on their behalf)**

The Applicant may provide a notarized power of attorney in the name of the authorized person as such document. If the power of attorney is granted through sub-delegation, both the basic power of attorney issued by the Applicant and the power of attorney granted through sub-delegation must be submitted.

If the authority of the person to act on behalf of the Applicant is evidenced by other documents (for example, a parent or other legal representative acts on behalf of the Applicant), rather than by a power of attorney, such other documents must be submitted.

The original or notarized copy of the power of attorney (if applicable, the original or notarized copies of the basic power of attorney and the power of attorney granted through sub-delegation, other documents evidencing the authority) must be submitted as part of the documentary evidence attached to the Application.

#### **3. Identity documents of the person acting on the Applicant's behalf (if a person other than the Applicant is acting on their behalf)**

3.1. If another person which is an individual, acts on behalf of the Applicant (i.e. signs or submits the Application and the documentary evidence), then a passport or other identity document of such other authorized person must be submitted.

If the authorized person of the Applicant submits documents in person at the IRC - R.O.S.T. office, the authorized person of the Applicant must submit the original passport or other identity document, which an IRC-R.O.S.T. employee may make a copy of.

If the Application and documentary evidence are sent by mail, a notarized copy of the passport or other identity document of the authorized person of the Applicant must be attached to the Application.

3.2. If a legal entity acts on the Applicant's behalf, the following documents must be submitted in relation to such legal entity:

- a. An extract from the Russian Unified State Register of Legal Entities (hereinafter referred to as the "**USRLE**") in relation to a Russian legal entity or an extract from a similar register in a foreign state (for example, an extract from the commercial register of a foreign state) in relation to a foreign legal entity, issued no more than 10 business days before the date of sending the Draft Application by email (for cases where the Regulations require sending the Draft Application by email) or before the receipt date of the Application along with the documentary evidence at IRC - R.O.S.T. (in all other cases). Such an extract must be submitted as original document signed by an official of the registering body or in notarized form and must contain, among other things, information about the sole executive body or other person acting with full authority on behalf of the legal entity (hereinafter referred to as the "**chief executive officer (CEO)**");
- b. documents identifying the individual acting on behalf of such legal entity (the requirements specified above in clause 3.1 of this appendix apply);
- c. if such individual is not the sole executive body or other chief executive officer of such legal entity specified in the extract from the USRLE or foreign analogue of the USRLE (see above), a notarized power of attorney issued to such individual by the represented legal entity must be submitted. The original or notarized copy of the power of attorney (if applicable, the original or notarized copies of the basic power of attorney and the power of attorney granted through sub-delegation) must be submitted as part of the documentary evidence attached to the Application.

4. **Consent to the processing of personal data of the Applicant and (if applicable) of the individual acting on the Applicant's behalf**

The filled-out and signed consent to the processing of personal data in the form posted on the NTMK website along with these Regulations must be submitted.

## APPENDIX 3

### **THE FOLLOWING EXTRA DOCUMENTS MUST BE SUBMITTED IF THE APPLICANT IS A LEGAL ENTITY:**

#### **1. Identification documents of the Applicant**

The following documents must be submitted pertaining to the Applicant:

- a. constituent documents (notarized copy);
- b. an extract from the USRLE in relation to a Russian legal entity or an extract from a similar register in a foreign state (for example, an extract from the commercial register of a relevant foreign state) in relation to a foreign legal entity, issued no more than 10 business days before the date of sending the Draft Application by email (for cases where the Regulations require sending the Draft Application by email) or before the receipt date of the Application along with the documentary evidence at IRC - R.O.S.T. (in all other cases). Such an extract must be submitted as original document signed by an official of the registering body or in notarized form and must contain, among other things, information about the sole executive body or other person acting with full authority on behalf of the legal entity (hereinafter referred to as the "**chief executive officer (CEO)**");

#### **2. A power of attorney or other legal document attesting to the person's authority to sign the Application and submit it along with any documentary evidence**

If a person which is an individual, acts (i.e. signs or submits the Application, the documentary evidence) on the Applicant's behalf who **is not** its sole executive body or other chief executive officer specified in the extract from the USRLE or foreign analogue of the USRLE (see above), a notarized power of attorney issued to such individual by the represented legal entity must be submitted. The original or notarized copy of the power of attorney (if applicable, the original or notarized copies of the basic power of attorney and the power of attorney granted through sub-delegation) must be submitted as part of the documentary evidence attached to the Application.

#### **3. Identity papers of the authorized Individual acting on the Applicant's behalf**

A passport or other identity document of such authorized person must be submitted.

If the authorized person submits documents in person at the IRC - R.O.S.T. office, the authorized person must submit the original passport or other identity document, which an IRC-R.O.S.T. employee may make a copy of.

If the Application and documentary evidence are sent by mail, a notarized copy of the passport or other identity document of the authorized person must be attached to the Application.



4. **Identification documents of a structure without forming a legal entity**

If the Applicant is not a direct owner of EVRAZ plc shares and indirectly owns NTMK shares through a chain involving **structures without legal entity status** (trusts, personal funds, etc.), the Applicant, among other things, must submit documents in relation to such structure in accordance with the applicable law of the jurisdiction in which such structure is created:

- a. Document or agreement on the creation of a structure without forming a legal entity (notarized copy);
- b. Documents pertaining to the person who established the structure without forming a legal entity and the person managing and disposing of the property transferred to such structure (the corresponding requirements for documents of individuals and legal entities set out in Appendices 2 and 3 to the Regulations apply);
- c. Documents evidencing the transfer of EVRAZ plc shares to the structure without forming a legal entity.

4. **Consent to the processing of personal data (if applicable) of the individual acting on the Applicant's behalf**

The filled-out and signed consent to the processing of personal data in the form posted on the NTMK website along with these Regulations must be submitted.

## **APPENDIX 4**

### **THE FOLLOWING EXTRA DOCUMENTS MUST BE SUBMITTED IF THE APPLICANT TRANSFERS THE RIGHT TO OBTAIN DIRECT OWNERSHIP OF NTMK SHARES:**

A notarized statement confirming the transfer by the Applicant of the right to acquire direct ownership of NTMK shares to a citizen of the Russian Federation or a Russian legal entity in accordance with Part 6, Article 7 of the Law. Such a statement must be submitted strictly in the original and must contain:

- (i) details that enable the applicant's clear identification;
- (ii) details that enable clear identification of the citizen of the Russian Federation or Russian legal entity as a recipient of the right to obtain direct ownership of NTMK shares;
- (iii) the exact number of EVRAZ plc shares for which the Applicant transfers the right to obtain direct ownership of NTMK shares to a citizen of the Russian Federation or a Russian legal entity.