

DISCLOSURE POLICY

Information disclosure is one of the most important tools for the Bank's interaction with shareholders, investors, customers and other interested parties, contributing to the formation of long-term, transparent and trust-based relationships with all stakeholders, while also improving the Bank's investment case.

Throughout 2019, the Bank's Supervisory Council monitored compliance on the part of the Bank and its employees with the requirements of the legislation of the Russian Federation on the securities market, on the protection of the rights and legitimate interests of investors in the securities market and on advertising; the regulations of the *Bank of Russia* concerning financial markets; and the requirements and standards of self-regulatory organisations of professional securities market participants that the Bank is a member of; as well as the Bank's internal regulations, including the Regulation on the Information Policy approved by the Bank's Supervisory Council on 1 December 2017 (minutes No. 18) (hereinafter, the "Information Policy").

When disclosing information, VTB Bank is guided by the applicable legislation of the Russian Federation, the requirements of *Moscow Exchange* and the *London Stock Exchange*, the Regulation on the Bank's Information Policy and its Corporate Governance Code, as well as other requirements and regulations.

PRINCIPLES OF INFORMATION DISCLOSURE BY THE BANK



The principle of providing information quickly, consistently and on a regular basis



The principle of accessibility to disclosed information



Compliance with regulations on the protection of information containing state, commercial, banking and/or official secrets of the Bank and other information protected by law, including insider information and protection of personal data



The principle of the reliability, completeness and comparability of disclosed information



Observance of a reasonable balance between the Bank's openness and protecting of its commercial interests

[The Bank's Information Policy and Corporate Governance Code](#) (available in Russian language only).

INFORMATION DISSEMINATED ABOUT THE BANK'S ACTIVITIES CAN BE DIVIDED INTO THREE GROUPS

1

Information that must be disclosed in the prescribed manner and by the means specified in regulatory documents and by regulatory authorities

2

Information disclosed by the Bank on a voluntary basis by any means chosen by the Bank

3

Publicly available information that is freely provided at the request of stakeholders for informational purposes

Primary information disclosure channels	2019 results
<p>The <i>Interfax</i> newswire and the Bank's dedicated page at: e-disclosure.ru/portal/company.aspx?id=1210 (available in Russian language only)</p>	<ul style="list-style-type: none"> • According to <i>Interfax</i>, the Bank continued to be ranked second in 2019 among leading companies in terms of information disclosure. • 2,345 statements • 1 annual report for 2018 • 2 accounting (financial) statements under RAS • 4 consolidated financial statements under IFRS • 4 quarterly issuer reports • 4 lists of affiliates • New versions of the Charter and the Regulation on the Procedure for Preparing, Convening and Holding General Meetings of Shareholders • Other documents in accordance with legislative requirements
<p>Information about VTB Bank on the website of the <i>London Stock Exchange</i>: londonstockexchange.com/exchange/prices-and-markets/stocks/summary/company-summary/US46630Q2021USUSDIOBE.html</p>	<ul style="list-style-type: none"> • 19 material facts / press releases
<p>VTB Bank's corporate website, vtb.ru and vtb.com, which offers the most complete information about the Bank's activities and is regularly updated in accordance with the requirements of legislation and the Bank's bylaws.</p>	<p>In addition to information published in accordance with the legislative requirements, the Bank also disclosed:</p> <ul style="list-style-type: none"> • Monthly IFRS financial results • A social report for 2018 • A presentation for investors • 480 press releases <p>The site received 27,807,741 visits in 2019.</p>
<p>The Company's account in the <i>Unified Federal Register of Information about the Activities of Legal Entities, Individual Entrepreneurs and Other Economic Entities</i>: fedresurs.ru/company/8365852f-517a-4f4f-a4ff-c779c25035bd (available in Russian language only)</p>	<ul style="list-style-type: none"> • 154 statements
<p>With regard to ensuring corporate actions: web channels (web service in conjunction with <i>Luch</i> software or the web office of the <i>National Settlement Depository</i>)</p>	<ul style="list-style-type: none"> • 13 statements
<p>Informational seminars, conferences, press conferences, meetings, forums and other meetings with persons concerned</p>	<ul style="list-style-type: none"> • 4 conference calls following the disclosure of IFRS statements (538 participants) • 14 meetings with private shareholders (782 participants) • 3 <i>Investor Days</i> for private shareholders (1,744 participants) • 8 <i>Open Doors Days</i> (82 participants)

THE BANK'S OFFICIAL SOCIAL MEDIA ACCOUNTS

 facebook.com/vtbgroup/ 206,000 followers	 facebook.com/vtbrussia/ 100,000 followers	 vk.com/vtb 106,700 followers	 ok.ru/vtb 9,500 followers
 twitter.com/vtb 18,800 followers	 instagram.com/bankvtb/ 40,400 followers	 youtube.com/user/vtbgroup 26,960,000 views	