

AD Plastik d.d.

Dioničko društvo za proizvodnju dijelova i pribora
za motorna vozila i proizvoda iz plastičnih masa

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Home Member State: Hrvatska

Listing: Zagreb Stock Exchange, Prime Market

In Solin, 30 December 2021

Notification of indirect changes in the voting rights percentage

Pursuant to the provisions of Article 472 of the Capital Market Act we hereby notify that on 30th December 2021 we received notices from Sergej Dmitrijevič Bodrunov, Alina Sergejevna Osipenko and Svetlana Sergejevna Bodrunova of indirect changes in the percentages of voting rights in AD Plastik d.d.

Sergej Dmitrijevič Bodrunov, through disposal of ADPL shares, reduced his ownership share in the company and fell below the threshold of five percent, so that he has no indirect voting rights any more. At the same time, Alina Sergejevna Osipenko and Svetlana Sergejevna Bodrunova indirectly acquired the mentioned shares, and thereby independently exceeded the threshold of 10 percent in ownership shares, as well as in voting rights in the company.

The received notices can be found later in this document.

Contact person:

Katia Zelić

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Submitted by: **Sergej Dimitrijević Bodrunov**
Dubkovskoe šosse 11, Flat 83, Sestroretsk
Sankt-Peterburg
Russian Federation
(the „Transferor“)

To: **Hrvatska agencija za nadzor financijskih usluga**
(Croatian Financial Services Supervisory Agency)
Ul. Franje Račkog 6
10000 Zagreb
Croatia

and

AD Plastik d.d.
Matoševa ulica 8
21210 Solin
Croatia

Zagreb, 30th December 2021

SUBJECT: Notice of change in voting rights pursuant to Article 482 of the Capital Market Act

Pursuant to the provisions of Article 482 of the Capital Market Act (Official Gazette No. 65/2018, with any subsequent amendments and additions; the „Act“) we hereby submit this notice of indirect changes in voting rights in the company AD Plastik d.d., with the registered office at Matoševa ulica 8, Solin, Croatia, entered in the court register of the Commercial Court in Split under the registration number (MBS): 060007090, PIN: 48351740621 (the „Issuer“).

Attached please find the power of attorney for the purpose of submission of this notice and taking other necessary actions, in which the Transferor authorizes Luka Tadić-Čolić, a lawyer from Zagreb, Ivana Lučića 2a/19, and therefore we ask you to send all communications and possible notices to the address of the chosen proxy.

Attachment 1: - the Transferor's Power of attorney dated 23rd December 2021;

1. Introduction

1.1. The Issuer is a joint stock company and its shares are listed on the regulated market managed by the market operator Zagrebačka burza d.d. (Zagreb Stock Exchange), Zagreb, Ivana Lučića 2a, Symbol: ADPL-R-A, ISIN: HRADPLRA0006 (the „**Shares**”).

1.2. The company AO „HOLDING“ AVTOKOMPONENTY“ with the registered office at Bol'shaya Monetnaya Ulitsa 16, Flat 30, Letter A, Building 13-N, No. 44, Posadskiy Municipal District, 197101 Sankt Peterburg, Russian Federation, entered in the Unified State Register of Legal Entities, under the company registration number (OGRN): 1117847003724 („**AO HAK**“) holds 29,999995% of the Shares in the share capital of the Issuer. The only member of the company AO HAK is a limited liability company „St. Petersburg Investment Company“ with the registered office at Bol'shaya Monetnaya Ulitsa 16, Flat 30, Letter A, Building 13-N, No. 39, Posadskiy District, 197101 Sankt Peterburg, Russian Federation, entered in the Unified State Register of Legal Entities, under the state registration number (GRN): 1147847371099 („**SPIK**“) holding 100% of shares in AO HAK.

1.3. Structure in the company SPIK before the below listed changes

- The Transferor holds business shares in the proportion of 470.184.920 / 470.194.920, nominal value in the amount of 470.184.920,00 RUB (in words: four hundred seventy million one hundred eighty four thousand nine hundred twenty Russian roubles), amounting to 99,998% of the total share capital and number of votes in the company SPIK.
- The company Aktsionernoye obshchestvo „Rossolimo“, with the registered office at Ulica Bol'shaya Monetnaya 16, Sankt-Peterburg, Russian Federation, entered in the Unified State Register of Legal Entities, under the company registration number (OGRN): 1117746837834 („**AO Rossolimo**“), is a holder of a business share in the proportion of 10.000 / 470.194.920 amounting to 0,002% of the share capital of the company SPIK.
- The shares in the share capital of the company SPIK are shown in the table below:

SPIK	Share in the share capital (RUB)	Share in the share capital (%)
Transferor	470,184,920	99,998%
AO Rossolimo	10,000	0,002%
Share capital amount	470,194,920	100,00%

1.4. Transfer of business shares in SPIK

- On 12th November 2021 the Transferor made a Business Share Donation Agreement with Mrs. Svetlana Sergejevna Bodrunova, born on 3rd April 1981, with residence at the address Ulica Kamyshovaya, Building 2, Flat 202, Sankt Peterburg, Russian Federation, as an acquirer (the „**Acquirer A**“), and the agreement was certified by notary public Barkova Olga, and entered in the book under number 78/25-n/78-2021-8-542 (the „**Donation Agreement A**“), by which the Transferor donated to the Acquirer A a part of

the business share in the proportion of 68.173.260 / 470.194.920, with nominal value amounting to 68.173.260,00 RUB (in words: sixty eight million one hundred seventy three thousand two hundred sixty Russian roubles), representing a 14,499% share in the share capital of the company SPIK.

- On 12th November 2021 the Transferor made a Business Share Donation Agreement with Mrs. Alina Sergejevna Osipenko, born on 9th October 1987, with residence at the address Ulica Kamyshovaya, Building 2, Flat 204, Sankt Peterburg, Russian Federation, as an acquirer („the **Acquirer B**“) and the agreement was certified by notary public Barkova Olga, and entered in the book under number 78/25-n/78-2021-8-543 (the „**Donation Agreement B**“), by which it donated to the Acquirer B a part of the business share in the proportion of 68.173.260 / 470.194.920, with nominal value amounting to 68.173.260,00 RUB (in words: sixty eight million one hundred seventy three thousand two hundred sixty Russian roubles), representing 14,499% of share capital of the company SPIK.
- After the transfers mentioned in paragraph 1.4 have been recorded in the Unified State Register of Legal Entities of the Russian Federation, i.e. on the basis of the signed Donation Agreement A and the Donation Agreement B (together referred to as: the „**Donation Agreements**“), the Acquirer A and the Acquirer B became members of the company SPIK in the proportions shown in the table below:

SPIK	Share in the share capital (RUB)	Share in the share capital (%)
Transferor	333,838,400	71,0000014%
Acquirer A	68,173,260	14,4989359%
Acquirer B	68,173,260	14,4989359%
AO Rossolimo	10,000	0,0021268%
Share capital amount	470,194,920	100,00%

- 1.5. After the above transfers**, the Transferor withdrew as a member of the company SPIK, and transferred 333.838.400 / 470.194.920 of business shares, or 71.00% of business shares to the SPIK company itself on the basis of the Statement of Withdrawal of 25th November 2021, certified by notary public Natalia Mikailova Barkova, entered in the book under number 78/25-H/78-2021-8-680 (the „**Statement of Withdrawal**“). By the mentioned changes SPIK acquired 333.838.400 / 470.194.920 of its own business shares, representing 71.00% of its own shares in the share capital, as shown in the table below:

SPIK	Share in the share capital (RUB)	Share in the share capital (%)	Share in votes
Acquirer A	68,173,260	14,499%	49,996%
Acquirer B	68,173,260	14,499%	49,996%
AO Rossolimo	10,000	0,002%	0,007%
In the SPIK balance sheet	333,838,400	71,000%	0,000%
Amount of the share capital	470,194,920	100,00%	100,00%

2. Notice of indirect change in voting rights of the Issuer

Pursuant to Article 486 of the Act, the Transferor hereby gives detailed information in respect of the changes in voting rights of the Issuer, as follows:

2.1. Firm, registered office and business address of the Issuer

AD Plastik d.d., with the registered office at Matoševa ulica 8, Solin, Croatia, entered in the court register of the Commercial Court in Split under the registration number (MBS): 060007090, PIN: 48351740621.

2.2. Information on the natural person falling below the threshold laid down in Art. 482 para. 1 of the Act

Sergej Dimitrijević Bodrunov, born on 25th August 1958, with residence at the address Dubkovskoe šosse 11, Sestroretsk, Sankt-Peterburg, Russian Federation.

2.3. Information on the shareholder if the shareholder is different from the natural person stated in paragraph 2 above, even if the shareholder has no right to exercise voting rights pursuant to Article 485 para. 1 of the Act

Although the Transferor does not consider this information significant for the notification, as a precaution it is mentioned here that the company AO Rossolimo is a holder of business shares in the proportion of 10.000 / 470.194.920 representing 0,002% of the share capital of the company SPIK. After the changes mentioned in paragraphs 1.4 and 1.5 of this notice, AO Rossolimo holds 0.002% of the share capital and 0.007% of voting rights in the company SPIK.

Attachment 2: Excerpt from the Unified State Register of Legal Entities showing data about the company AO Rossolimo, as a copy with a certified translation to Croatian;

2.4. The data on the chain of controlled undertakings through which the natural person actually holds the voting rights

The company SPIK holds 100% of ordinary shares in the company AO HAK, and the company AO HAK holds 29.999995% of ordinary shares in the share capital of the Issuer.

2.5. Information on the situation of which the falling below the threshold is the result

The Transferor indirectly disposed of 8.699% of the voting rights in the Issuer from the total of 29.998%. Pursuant to Article 482 para. 1 of the Act, the Transferor thereby indirectly fell below the threshold of 25% of voting rights in the Issuer. The said change in voting rights of the Issuer is the consequence of the donations mentioned in paragraph 1.4.

The Transferor indirectly disposed of the remaining 21.299% in the Issuer from the total of 29.998%, i.e. pursuant to Article 482 para. 1 of the Act, the Transferor indirectly fell below the threshold of 5% of voting rights in the Issuer. The said change in voting rights of the Issuer is the consequence of the withdrawal mentioned in paragraph 1.5.

2.6. Information on the documents based on which the fall below the threshold laid down by Article 482 para. 1 of the Act has occurred

The changes mentioned in paragraphs 1.4 and 1.5 were carried out on the basis of the following documents:

- (i) the Donation Agreement A;
- (ii) the Donation Agreement B, and
- (iii) the Statement of Withdrawal.

Attachment 3:

- *the Donation Agreement of a part of business shares in the share capital of the company SPIK made between the Acquirer A and the Transferor of 12th November 2021, certified by notary public Barkova Olga, entered in the book under number 78/25-n/78-2021-8-542, as a copy and a certified translation to Croatian;*
- *the Donation Agreement of a part of business shares in the share capital of the company SPIK made between the Acquirer B and the Transferor, of 12th November 2021, certified by notary public Barkova Olga, entered in the book under number 78/25-n/78-2021-8-543, as a copy and a certified translation to Croatian;*
- *Statement of Withdrawal of the Transferor from the membership in the company SPIK of 25th November 2021, certified by notary public Natalia Mikailova Barkova, entered*

in the book under number 78/25-H/78-2021-8-680, as a copy and a certified translation to Croatian;

2.7. Information on the number of the disposed of and the total number of voting rights held after falling under the threshold laid down by Art. 482 para. 1 of the Act

After the donation agreements mentioned in paragraph 1.4 were executed, the Transferor indirectly held 894.511 Shares in the Issuer, representing 21.299% of the voting rights in the Issuer, or, pursuant to Article 482 para. 1 of the Act, the Transferor fell below the threshold of 25% of the voting rights in the Issuer.

After withdrawing from the company SPIK as mentioned in paragraph 1.5, the Transferor indirectly disposed of 894.511 Shares in the Issuer, what represents 21.299% of the voting rights in the Issuer. After the withdrawals have been executed, the Transferor has no indirect voting rights in the Issuer, or, pursuant to Article 482 para. 1 of the Act, the Transferor fell below the threshold of 5% of the voting rights in the Issuer.

2.8. Date of falling below the threshold

The Transferor indirectly fell under the threshold of 25% of voting rights in the Issuer on 19th November 2021.

The Transferor indirectly fell under the threshold of 5% of voting rights in the Issuer on 3rd December 2021.

The Transferor hereby informs HANFA that the governing law for the Donation Agreements and the Statement of Withdrawal is the law of the Russian Federation, i.e. specifically the Federal Law on Limited Liability Companies of the Russian Federation, in force since 8th February 1998, No. 14-FZ (the „Federal Law“), as can be seen in the Donation Agreements and the Statement of Withdrawal.

In relation to the Donation Agreements, Article 21 Clause 12 of the Federal Law applies, which states that business shares, or parts of business shares in the share capital of a company **shall be transferred to the acquirer on the day of the relevant entry** in the Unified State Register of Legal Entities, and not on the day of the signing of the agreement as in accordance with the Croatian law.

Equally, in relation to the Statement of Withdrawal, Article 23 Clause 6.1 and Clause 7 Sub clause 2 of the Federal Law applies, and it states that in the case of withdrawal of a company member from the company, its **share shall be transferred to the company on the day of the relevant record** in the Unified State Register of Legal Entities.

Consequently, effects of the Donation Agreements and effects of the Statement of Withdrawal begin to produce legal effects only on the day of their entry in the competent register, and not on the day of their conclusion; i.e. the Donation Agreements were recorded in the Unified State Register of Legal Entities on 19th November 2021, and the Statement of Withdrawal on 3rd December 2021 and they start to produce legal effects on that day.

Attachment 4: Excerpt from the Unified State Register of Legal Entities showing data about the SPIK company, dated 28th December 2021, as a copy with a certified translation to Croatian;

However, due to the COVID-19 pandemic, the Transferor was prevented from obtaining an official excerpt from the competent register showing the mentioned changes, and according to the Russian law this excerpt is the only relevant proof that the executed donations started to produce legal effects.

For this reason, the Transferor hereby delivers to HANFA an excerpt from the Unified State Register of Legal Entities showing data on the disposal of shares for the Transferor of 28th December 2021, and this date shall be considered the relevant date for calculating the time for submission of notice on indirect change in voting rights of the Issuer.

Following from all of the foregoing and pursuant to the provisions of Article 482 of the Act, the Transferor hereby submits to HANFA and the Issuer the notice on indirect change in voting rights in the prescribed contents and within the prescribed deadline, together with the relevant documentation.

Yours faithfully,



Sergej Dimitrijević Bodrunov,
by power of attorney

Submitted **Alina Sergejevna Osipenko**
by: Ulica Kamyshovaya, Building 2, Flat 204
Sankt-Peterburg
Russian Federation
(the „Acquirer A”)

and

Svetlana Sergejevna Bodrunova
Ulica Kamyshovaya, Building 2, Flat 202
Sankt-Peterburg
Russian Federation
(the „Acquirer B”)

(Acquirer A and Acquirer B together referred to as: the
„Acquirers”)

To: **Hrvatska agencija za nadzor financijskih usluga**
(*Croatian Financial Services Supervisory Agency*)
Ul. Franje Račkog 6
10000 Zagreb
Croatia

and

AD Plastik d.d.
Matoševa ulica 8
21210 Solin
Croatia

In Zagreb, 30th December 2021

SUBJECT: Notice of change in voting rights pursuant to Article 482 of the Capital Market Act

Pursuant to the provisions of Article 482 of the Capital Market Act (Official Gazette No. 65/2018, with any subsequent amendments and additions; the „Act”) we hereby submit this notice of indirect changes in voting rights in the company AD Plastik d.d., with the registered office at Matoševa ulica 8, Solin, Croatia, entered in the court register of the Commercial Court in Split under the registration number (MBS): 060007090, PIN: 48351740621 (the „Issuer”).

Attached please find the powers of attorney for the purpose of submission of this notice and taking other necessary actions, in which the Acquirers empower Luka Tadić-Čolić, a lawyer from Zagreb, Ivana Lučića 2a/19, and therefore we ask you to send all communications and possible notices to the address of the chosen proxy.

Attachment 1: - Powers of attorney of the Acquirer A and the Acquirer B dated 23rd December 2021;

1. Introduction

1.1. The Issuer is a joint stock company and its shares are listed on the regulated market managed by the market operator Zagrebačka burza d.d. (Zagreb Stock Exchange), Zagreb, Ivana Lučića 2a, Symbol: ADPL-R-A, ISIN: HRADPLRA0006 (the „**Shares**“).

1.2. The company AO „HOLDING“ AVTOKOMPONENTY” with the registered office at Bol'shaya Monetnaya Ulitsa 16, Flat 30, Letter A, Building 13-N, No. 44, Posadskiy Municipal District, 197101 Sankt Peterburg, Russian Federation, entered in the Unified State Register of Legal Entities, under the company registration number (OGRN): 1117847003724 („**AO HAK**“) holds 29,999995% of the Shares in the share capital of the Issuer. The only member of the company AO HAK is a limited liability company „St. Petersburg Investment Company“ with the registered office at Bol'shaya Monetnaya Ulitsa 16, Flat 30, Letter A, Building 13-N, No. 39, Posadskiy District, 197101 Sankt Peterburg, Russian Federation, entered in the Unified State Register of Legal Entities, under the company registration number (OGRN): 1147847371099 („**SPIK**“) holding 100% of ordinary shares in AO HAK.

1.3. Structure in the SPIK company before the below listed changes

- Mr. Sergej Dimitrijević Bodrunov, born on 25th August 1958, with residence at the address Dubkovskoe šosse 11, Flat 83, Sestroretsk, Sankt-Peterburg, Russian Federation (the „**Transferor**“) was a holder of business shares in the proportion of 470.184.920 / 470.194.920, with nominal value in the amount of 470.184.920,00 RUB (in words: four hundred seventy million one hundred eighty four thousand nine hundred twenty Russian roubles), amounting to 99,998% of the total share capital and number of votes in the company SPIK.
- The company Aktsionernoye obshchestvo „Rossolimo“, with the registered office at Ulica Bol'shaya Monetnaya 16, Flat 30, Letter A, Building 14-N, No. 43, Sankt-Peterburg, Russian Federation, entered in the Unified State Register of Legal Entities, under the state registration number (GRN): 1117746837834 („**AO Rossolimo**“), is a holder of a business share in the proportion of 10.000 / 470.194.920 amounting to 0,002% of the share capital of the company SPIK.
- The shares in the share capital of the company SPIK are shown in the table below:

SPIK	Share In the share capital (RUB)	Share In the share capital (%)
Transferor	470,184,920	99,998%
AO Rossolimo	10,000	0,002%
Share capital amount	470,194,920	100,00%

1.4. Transfer of business shares in SPIK

- On 12th November 2021 the Transferor made a Business Share Donation Agreement with the Acquirer A, certified by notary public Olga Barkova, and entered in the book under number 78/25-n/78-2021-8-543 (the „**Donation Agreement A**“), by which the Transferor

donated to the Acquirer A a part of the business share in the proportion of 68.173.260 / 470.194.920, with nominal value amounting to 68.173.260,00 RUB (in words: sixty eight million one hundred seventy three thousand two hundred sixty Russian roubles), representing a 14,499% share in the share capital of the company SPIK.

- On 12th November 2021 the Transferor made a Business Share Donation Agreement with the Acquirer B and the agreement was certified by notary public Olga Barkova, entered in the book under number 78/25-n/78-2021-8-542 (the „**Donation Agreement B**“), by which it donated to the Acquirer B a part of the business share in the proportion of 68.173.260 / 470.194.920, with nominal value amounting to 68.173.260,00 RUB (in words: sixty eight million one hundred seventy three thousand two hundred sixty Russian roubles), representing 14,499% in the share capital of the company SPIK.
- After the transfers mentioned in paragraph 1.4 have been recorded in the Unified State Register of Legal Entities of the Russian Federation, i.e. on the basis of the signed Donation Agreement A and the Donation Agreement B (together referred to as: the „**Donation Agreements**“), the Acquirer A and the Acquirer B became members of the company SPIK in the proportions shown in the table below

SPIK	Share in the share capital (RUB)	Share in the share capital (%)
Transferor	333,838,400	71,0000014%
Acquirer A	68,173,260	14,4989359%
Acquirer B	68,173,260	14,4989359%
AO Rossolimo	10,000	0,0021268%
Share capital amount	470,194,920	100,00%

- 1.5. After the above transfers**, the Transferor withdrew as a member of the company SPIK, and transferred 333.838.400 / 470.194.920 of business shares, or 71.00% of business shares to the company SPIK itself on the basis of the Statement of Withdrawal of 25th November 2021, certified by notary public Natalia Mikailova Barkova, entered in the book under number 78/25-H/78-2021-8-680 (the „**Statement of Withdrawal**“). By the mentioned changes SPIK acquired 333.838.400 / 470.194.920 of its own business shares, representing 71.00% of its own shares in the share capital, as shown in the table below.

SPIK	Share in the share capital (RUB)	Share in the share capital (%)	Share in votes
Acquirer A	68,173,260	14,499%	49,996%

Acquirer B	68,173,260	14,499%	49,996%
AO Rossolimo	10,000	0,002%	0,007%
In the SPIK balance sheet	333,838,400	71,000%	0,000%
Amount of the share capital	470,194,920	100,00%	100,00%

2. Notice of indirect change in voting rights of the Issuer

Pursuant to Article 486 of the Act, the Acquirer A and the Acquirer B hereby give detailed information in respect of the changes in the voting rights of the Issuer:

2.1. Company name, registered office and business address of the Issuer

AD Plastik d.d., with the registered office at Matoševa ulica 8, Solin, Croatia, entered in the court register of the Commercial Court in Split under the registration number (MBS): 060007090, PIN: 48351740621

2.2. Information on the natural person which exceeded the threshold laid down in Art. 482 para. 1 of the Act

Svetlana Sergejevna Bodrunova, born on 3rd April 1981, with residence at the address Ulica Kamyshovaya, Building 2, Flat 202, Sankt Peterburg, Russian Federation, and

Alina Sergejevna Osipenko, born on 9th October 1987, with residence at the address Ulica Kamyshovaya, Building 2, Flat 204, Sankt Peterburg, Russian Federation

Attachment 2: Copy of passports of the Acquirer A and the Acquirer B with the certified translation to Croatian;

2.3. Information on the shareholder if the shareholder is different from the natural person stated in paragraph 2 above, even if the shareholder has no right to exercise voting rights pursuant to Art. 485 para. 1 of the Act

Although the Acquirers do not consider this information significant for the notification, as a precaution it is mentioned here that the company AO Rossolimo is a holder of business shares in the proportion of 10.000 / 470.194.920 representing 0,002% of the share capital of the company SPIK. After the changes mentioned in paragraphs 1.4 and 1.5 of this notice, AO Rossolimo holds 0.002% of the share capital and 0.007% of voting rights in the company SPIK.

Attachment 3: Excerpt from the Unified State Register of Legal Entities showing data about the company AO Rossolimo, as a copy with a certified translation to Croatian;

2.4. The data on the chain of controlled undertakings through which the natural person actually holds the voting rights

The company SPIK holds 100% of ordinary shares in the company AO HAK, and the company AO HAK holds 29.999995% of ordinary shares in the share capital of the Issuer.

2.5. Information on the situation of which the exceeding of the threshold is the result

The Acquirers have each indirectly acquired 629.891 Shares, amounting to 14.998 % of the voting rights in the Issuer. The mentioned share in the share capital of the Issuer is calculated in accordance with Article 482 Clause 1 of the Act, the Acquirer A and the Acquirer B individually exceeded the threshold of 10% of the voting rights in the Issuer. The said changes in the voting rights of the Issuer are the consequence of transfers mentioned in paragraphs 1.4 and 1.5.

2.6. Information on the documents based on which the threshold laid down by Article 482 para. 1 of the Act has been exceeded

The changes mentioned in paragraphs 1.4 and 1.5 were carried out on the basis of the following documents:

- (i) the Donation Agreement A;
- (ii) the Donation Agreement B, and
- (iii) the Statement of Withdrawal.

Attachment 4:

- *the Donation Agreement for a part of business shares in the share capital of the company SPIK made between the Acquirer A and the Transferor of 12th November 2021, certified by notary public Barkova Olga, entered in the book under number 78/25-n/78-2021-8-543, as a copy and a certified translation to Croatian;*
- *the Donation Agreement for a part of business shares in the share capital of the company SPIK made between the Acquirer B and the Transferor of 12th November 2021, certified by notary public Barkova Olga, entered in the book under number 78/25-n/78-2021-8-542, as a copy and a certified translation to Croatian;*
- *Statement of Withdrawal of the Transferor from the membership in the company SPIK of 25th November 2021, certified by notary public Natalia Mikailova Barkova, entered in the book under number 78/25-H/78-2021-8-680, as a copy and a certified translation to Croatian;*

2.7. Information on the number of the acquired and the total number of voting rights held after exceeding the threshold laid down by Art. 482 para. 1 of the Act

After the changes mentioned in paragraphs 1.4 and 1.5, the Acquirer A and the Acquirer B each indirectly acquired 629.891 Shares, representing 14.998% of the voting rights in the

Issuer. Pursuant to Article 482 para. 1 of the Act, both the Acquirer A and the Acquirer B thereby individually exceeded the threshold of 10% of the voting rights in the Issuer.

2.8. Date of exceeding the threshold

The Acquirer A and the Acquirer B, each indirectly exceeded the threshold of 10% of voting rights in the Issuer on 3rd December 2021, when the transfers mentioned in paragraphs 1.4 and 1.5 were carried out.

However, the Acquirers hereby inform HANFA that the governing law for the Donation Agreements and the Statement of Withdrawal is the law of the Russian Federation, i.e. specifically the Federal Law on Limited Liability Companies of the Russian Federation, in force since 8th February 1998, No. 14-FZ (the „**Federal Law**“), as can be seen in the Donation Agreements and the Statement of Withdrawal.

In relation to the Donation Agreements, Article 21 Clause 12 of the Federal Law applies, which states that business shares, or parts of business shares in the share capital of a company **shall be transferred to the acquirer on the day of the relevant entry** in the Unified State Register of Legal Entities, and not on the day of the signing of the agreement as in accordance with the Croatian law.

Equally, in relation to the Statement of Withdrawal, Article 23 Clause 6.1 and Clause 7 Sub clause 2 of the Federal Law applies, and it states that in the case of withdrawal of a company member from the company, its **share shall be transferred to the company on the day of the relevant record** in the Unified State Register of Legal Entities.

Consequently, effects of the Donation Agreements and effects of the Statement of Withdrawal begin to produce legal effects only on the day of their entry in the competent register, and not on the day of their conclusion; i.e. the Donation Agreements were recorded in the Unified State Register of Legal Entities on 19th November 2021, and the Statement of Withdrawal on 3rd December 2021 and they start to produce legal effects on that day.

Attachment 5: Excerpt from the Unified State Register of Legal Entities showing data of the company SPIK, dated 28th December 2021, as a copy with a certified translation to Croatian;

However, due to the COVID-19 pandemic, the Acquirers were prevented from obtaining an official excerpt from the competent register showing the mentioned changes, and according to the Russian law this excerpt is the only relevant proof that the executed gifts started to produce legal effects

For this reason, the Acquirers hereby deliver to HANFA an excerpt from the Unified State Register of Legal Entities showing data on the acquiring of shares for the Acquirers of 28th December 2021, and this date shall be considered the relevant date for calculating the time for submission of the notice on indirect change in the voting rights of the Issuer.

Following from all of the foregoing and pursuant to the provisions of Article 482 of the Act, the Acquirers hereby submit to HANFA and the Issuer the notice on indirect change in voting rights in the prescribed contents and within the prescribed time, together with the relevant documentation.

As a note, the Acquirers hereby draw the Addressee's attention to the fact that they have informed the Addressee in a separate procedure about the use of exemption from the obligation to make a bid for the takeover in accordance with the provisions of the Mandatory Takeover Act (Official Gazette No. 109/207, with subsequent amendments and additions). In the said procedure, the relevant dates and details of the related transactions were referred to in accordance with applicable legal requirements.

Yours faithfully,

Acquirer A



Alina Sergejevna Osipenko,
by a power of attorney

Acquirer B



Svetlana Sergejevna Bodrunova,
by a power of attorney