

APPROVED
by resolution of the Board of Directors
of JSC TransContainer
dated July ____, 2008 (minutes ____)

Chairman of the Board of Directors
of JSC TransContainer

_____ D.K. Novikov

Provision on Insider Information of JSC TransContainer

I. Basic provisions

1.1. This Provision establishes the order of use of information about activity of JSC TransContainer (hereinafter the Company), securities of the Company and transactions with securities which is not public information and which disclosure can produce an adverse effect on market value of securities of the Company (insider information), and the order of use of insider information, protection of insider information from unauthorized use and liability for unauthorized use of insider information.

1.2. In this Provision the following basic meanings are used:

Insider information - information on activity of the Company, securities of the Company and transactions with them which is not public information and which disclosure can produce an adverse effect on market value of securities of the Company.

Public information shall mean information disclosed in any manner that makes it available to any interested person, including information disclosed according to the law of the Russian Federation on securities market, placed on corporate web-site of the Company, disclosed by representatives of the Company at public press conferences, published in mass media with the consent of the Company.

Insider information does not include any data containing assessment of value of securities and/or assessment of assets of the Company made on the basis of public information.

Insider – an individual or a corporate entity who has an access to the insider information by virtue of holding an official or other position on the basis of the laws of the Russian Federation, the Articles of Association or internal documents of the Company, job duties or contract with the Company.

Insiders shall include:

- Members of the Board of Directors of the Company;
- Members of committees at the Board of Directors of the Company;
- person acting as the sole executive body of the Company (General Director/Management Company);
- deputy general directors and corporate governance directors of the Company, chief accountant and chief engineer of the Company;
- heads of branches and representative offices of the Company;
- employees of the Company and its affiliated or dependent companies having by virtue of their position an access to insider information;
- individuals or corporate entities who render services to the Company, including on the basis of civil contracts and having an access to insider information;
- members of Audit Committee of the Company, and the persons involved by Audit Committee to hold audits, having by virtue of holding their positions an access to insider information;
- registrar of the Company, including its employees and persons who render services to the registrar on the basis of civil contracts, having by virtue of holding their positions an access to insider information;
- auditor of the Company, including its employees and persons who render services to the auditor on the basis of civil contracts, having by virtue of holding their positions an access to insider information;
- appraiser of the Company, including its employees and persons who render services to the appraiser on the basis of civil contracts, having by virtue of holding their positions an access to insider information;
- financial adviser of the Company;
- other individuals or corporate entities having legal access to insider information.

1.3. This Provision is developed with a view to control activity of insiders, prevent and preclude cases of unauthorized use of insider information in the Company, prevent manipulations with prices for the Company's securities.

II. Order of use of insider information

2.1. Insiders are recommended to withhold from closing transactions with securities of the Company within the period when they have an access to insider information.

2.2. Insiders shall:

- observe requirements of the laws of the Russian Federation, Articles of Association and internal documents of the Company determining the order of use of insider information, and observe the established regulations of the Company for use of insider information;

- use insider information only for the benefit of the Company according to the laws of the Russian Federation;

- transfer to the Company at the time of expiry or termination of employment or other contract with the Company any electronic, hard copy, digital or other carriers containing information on the Company;

- disclose to the Company information on securities of the Company held by them;

- inform the Company in writing on their intention to close transactions with securities of the Company at least 5 days before the date of closing such transactions, and about closed transactions with such securities by giving a notice indicating material conditions of such transaction;

- not disclose insider information after termination/cancellation of employment and/or other contract with the Company .

2.3. Insiders shall disclose to the Board of Directors of the Company information on securities of the Company held by them:

- members of the Board of Directors, Audit Committee of the Company, the person acting as the sole executive body of the Company, within seven working days from the date of election/assignment to the relevant body of the Company;

- persons who perform any job or other professional duties for the Company, and therefore have an access to insider information - within seven working days from the date of concluding relevant contract with them;

- Auditor of the Company - within seven working days from the date of the including relevant contract with them;

- Registrar of the Company - within seven working days from the date it enters into a contract for keeping a register of owners of registered securities of the Company;

- persons who by virtue of holding an official or other position in a legal person who is an insider have an access to insider information - within seven working days from the date of relevant contract between the insider and the Company.

2.4. Insiders shall not:

- use insider information for the purpose of purchase or sale of securities of the Company at their own expense or at the expense of any third parties;
- disclose/provide to third parties insider information of the Company or information generated therefrom, including give recommendations for closing of transactions with securities of the Company;
- give other persons recommendations whether or not to close transactions with securities of the Company based on insider information;
- use insider information of the Company for personal benefit or other benefits contradicting the interests of the Company.

III. Measures on protection of insider information from unauthorized use

3.1. With a view of protection of insider information of against unauthorized use the Company shall duly disclose information according to requirements of the laws of the Russian Federation.

3.2. The Company, and to the extent of their powers, members of management and control bodies of the Company, officials and employees of the Company are obliged to take necessary measures to protect insider information and preclude its unauthorized use.

3.3. The Company has the right to introduce special procedures for protection of insider information from unauthorized use, including, if necessary:

- establish access mode for persons (including employees of the Company) to certain premises occupied by the Company (including on days off);
- determine access rights of members of the Company's bodies, certain employees or categories of employees of the Company to insider information;
- ensure that members of the Company's bodies and employees of the Company undertake written obligations of nondisclosure of insider information;
- provide access to certain data being insider information only in certain places;
- in due time destroy all documents not subject to storage which can contain insider information, and delete all insider information on electronic carriers which is not subject to storage;

- introduce procedures for protection of workplaces and places of storage of documents from authorized access;
- use information and technical protection systems that protect from loss of information and authorized access to information through communication channels;
- introduce other procedures that the Company thinks necessary.

3.4. At the time of execution of employment or civil contract authorizing an access to insider information of the Company, provide for conditions on nondisclosure of insider information and prohibition of its unauthorized use.

3.5. Employees of the Company authorized to communicate with shareholders of the Company and other interested persons shall provide an equal opportunity for all interested persons of simultaneous access to the disclosed information on activity of the Company, and take measures to immediately disprove unreliable information.

3.6. Director General of the Company is obliged to inform the Board of Directors of the Company on any facts of infringement of requirements established by this Provision and liability applied to persons who have committed the said infringements.

IV. Liability

4.1. For unauthorized distribution and/or use of insider information the Company's insiders can be held liable according to the laws of the Russian Federation, internal documents of the Company or conditions of agreements concluded with the Company.

4.2. Insiders shall be liable for any losses caused to the Company and/or its shareholders in connection with unauthorized disclosure and/or use of insider information.
