

Internal control rules for prevention, detection and suppression of illegal use of insider information and (or) market manipulation

I. BASIC CONCEPTS AND DEFINITIONS

The following concepts, definitions, abbreviations and abbreviations are used in these Internal control rules for preventing, detecting and suppressing the unlawful use of insider information and / or market manipulation of Globaltrans Investment PLC ("the Company") (the "Regulations"):

Internal documents – internal documents of the Company that define the procedure for access to Insider information, the rules for protecting its confidentiality, or the procedure for implementing internal control to prevent, detect or suppress the unlawful use of Insider information and (or) market manipulation.

Insider – a person who possesses or has access to Insider information by virtue of their official or other position, on the basis of laws, regulations, Internal documents of the Company, as well as on the basis of an agreement with the Company.

Insider information – information of a precise nature that has not been distributed or provided (including information that constitutes commercial, official, bank secrets, communication secrets (in terms of information about postal money transfers) and other secrets protected by law), the distribution or provision of which would be likely to have a significant effect on the prices of Financial instruments, and which relates to insider information in accordance with the list of insider information.

The Company – Globaltrans Investment PLC.

Violators – this term is used in relation to Insiders who have violated the requirements stipulated by Applicable law, these Regulations, or other Internal documents of the Company.

NIIMR – unlawful use of Insider information and (or) market manipulation.

Operations with financial instruments (hereinafter referred to as "the Operations") – transactions and other actions targeted at acquiring, alienating, or otherwise changing rights to Financial instruments, as well as actions related to accepting obligations to perform these actions, including issuing the requests (giving the instructions).

Group Securities Dealing Code and PDMR Securities Dealing Code means the Globaltrans Investment PLC Group Securities Dealing Code and PDMR Securities Dealing Code as adopted by the directors by resolution on 15 December 2017.

Trade organizer – a stock exchange or other organization that carries out activities related to the organization of trade in financial instruments.

Provision of information – actions targeted at obtaining information by a certain group of persons in accordance with the requirements of the Applicable securities legislation.

Applicable law – legislation of the Republic of Cyprus, Regulation No. 596/2014 of the European Parliament and of the Council of the European Union of April 16, 2014 "On Market Abuse Regulation" (hereinafter referred to as the "MAR"), Federal law No. 224 – FZ of July 27, 2010 "On combating the unlawful use of insider information and market manipulation and on amendments to certain legislative acts of the Russian Federation" (hereinafter referred to as "the Law"), Bank of Russia's Directive No. 3379-Y dated September 11, 2014 "On the list of insider information of persons who are listed in points 1 - 4, 11 and 12 of article 4 of the Federal law "On combating improper use of insider information and market manipulation and on amendments to certain legislative acts of the Russian Federation" (hereinafter – "the Instruction of the Central Bank No. 3379-Y"), the Bank of Russia's Instruction dated August 1, 2019 No. 5222-Y "On requirements for internal control rules to prevent, identify and suppress unauthorized use of insider information and (or) market manipulation the legal entities mentioned in paragraphs 1, 3 - 8, 11 and 12 of article 4 of Federal law No. 224-FZ of July 27, 2010 "On combating the unlawful

use of insider information and market manipulation and on amendments to certain legislative acts of the Russian Federation" (hereinafter – "Instruction No. 5222-Y"), Order of the Federal Financial Service of Russia dated February 28, 2012 No. 12-9/ПЗ-Н "On approval of the Regulations on the procedure and terms for disclosure of insider information of persons listed in paragraphs 1 – 4, 11 and 12 of article 4 of the Federal law "On combating the unlawful use of insider information and market manipulation and on amendments to certain legislative acts of the Russian Federation" (hereinafter – "Order No. 12-9/ПЗ-Н"), Order of the FFMS of Russia dated June 18, 2013 No. 13-51/ПЗ-Н "On approval of Regulations on the notification procedure of persons about their inclusion in the list of insiders and withdrawal from such list, Regulation on the procedure for transfer of lists of insiders to the trade organizers through which transactions with financial instruments, foreign currency and (or) goods are carried out, Regulations on the procedure and terms for submitting notifications by insiders about the transactions performed by them" (hereinafter – "Order No. 13-51/ ПЗ-Н"), the Bank of Russia's Instruction dated April 22, 2019 No. 5129-Y "On the procedure of transfer of the list of insiders by legal persons listed in paragraphs 1, 3 to 7, 11 and 12 article 4 of Federal law dated 27 July 2010 No. 224-FZ "On combating unlawful use use of insider information and market manipulation and on amendments to certain legislative acts of the Russian Federation" to the organizer of trade through which the transactions with financial instruments, foreign currency and (or) goods are carried out, on request by the latter " (hereinafter – "Instructions No. 5129-Y").

Controlled entity (controlled organization) – a legal entity that is under the direct or indirect control of the Company.

Dissemination of information means the actions:

- a) aimed at obtaining information by an indefinite scope of persons or transmitting information to an indefinite scope of persons, including those by disclosing it in accordance with the requirements of the Applicable securities legislation;
- b) related to the publication of information in mass media, including electronic, public information and telecommunications networks (including the Internet»);
- c) related to the dissemination of information through electronic, public information and telecommunications networks (including the Internet).

Financial instrument – a security or derivative financial instrument.

II. INTRODUCTION

2.1. In accordance with the legislation of the Russian Federation, the Company is an Insider, acting as an issuer whose equity securities are admitted to trading on the Organizer of trading on the securities market;

2.2. The present Regulations are developed in accordance with the Applicable legislation in order to ensure fair pricing of securities of the Company, protect the Company's reputation, prevent securities market manipulation or other unlawful use of Insider information about the activities of the Company and its controlled organizations, including the transactions with securities of the Company by using such Insider information, and it includes:

- the procedure of access to Insider information and keeping it to be confidential;
- procedure and terms for disclosure of Insider information;
- monitoring procedure for compliance with the requirements of the Applicable legislation on Insider information;
- liability for illegal use and disposal of Insider information;
- internal control rules for prevention, detection and suppression of illegal use of Insider information and (or) market manipulation.

2.3. Implementation of internal controls aimed at achieving the following objectives:

- 2.3.1. Prevention and avoidance of identified or potential violations by the Company, management bodies, officials and employees of the Company in the field of R & D (NIIIMR).
- 2.3.2. Prevention and avoidance of the consequences of implementation risk of the Company costs (losses) and (or) other adverse effects as a result of its inconsistency or incompatibility of its activities to the requirements in the field of combating NIIIMR and the internal documents of the Company, and (or) the result of applying a regulatory authority measures to the Company (hereinafter "the Regulatory risk in the field of combating NIIIMR").
- 2.3.3. Monitoring for compliance with the requirements of Applicable legislation and Internal documents of the company, including compliance with the procedure and terms for disclosure of the Company's Insider information.
- 2.3.4. Ensuring compliance of the Company's documents with the Applicable law in the field of combating NIIIMR and compliance of Internal Company documents to each other.
- 2.4. Internal control is carried out using methods that best correspond to the nature and scope of the Company's activities and they include:
- 2.4.1. Establishing a special procedure for Insiders' transactions with the Company's securities.
- 2.4.2. The assessment of the Company's activities in accordance with Applicable legislation and Internal documents of the Company.
- 2.4.3. Training of employees and members of the Company's management bodies in combating the unlawful use of Insider information and (or) market manipulation.
- 2.4.4. Analysis of the statistics of applications (including complaints), requests and petitions (if the specified statistics are available).
- 2.4.5. Preparation and submission to the Chairman of the Board of Directors of the Company of reports on probable and (or) upcoming events of Regulatory risk in the field of combating the NIIIMR and reports on the activities of the responsible internal auditor (hereinafter – "Internal auditor's reports"), as well as improvement of measures taken by the Company to comply with the requirements in the field of combating the NIIMR based on the information received.
- 2.5. In case of adoption of new or changes in existing legislative and other regulatory legal acts regulating the procedure for working with Insider information, this document is valid until the relevant changes and additions are made to the extent that does not contradict them.
- 2.6. The Company's internal auditor monitors the compliance by the Company, management bodies, officials and employees with the Applicable legislation, as well as special requirements stipulated in the Company's Internal documents to prevent conflicts of interest and limit abuse of Insider information. The Company's internal auditor takes correspondence, communications, including requests, applications, and complaints in the field of combating NIIIMR, by e-mail (compliance@globaltrans.com). The Company's internal auditor is accountable to the Chairman of the Company's Board of Directors and is subordinated to the Company's Board of Directors.
- 2.7. The rights and obligations of the internal auditor include:
- 2.7.1. The right to request documents and information, including explanations, necessary for the internal auditor to perform its functions from persons who are members of the management bodies, structural divisions and employees of the Company.
- 2.7.2. The Right to transmit to the regulatory body (including the FSA and the Bank of Russia) information about probable and (or) upcoming events of Regulatory risk in the field of combating the NIIIMR.
- 2.7.3. The obligation to identify, analyze, evaluate and monitor Regulatory risk in the field of combating the NIIIMR.

- 2.7.4. The obligation to organize processes aimed at managing Regulatory risk in combating the NIIIRM, including the development of measures aimed at prevention and avoidance of consequences of the implementation of Regulatory risk in the field of combating NIIIMR, and monitoring these events.
- 2.7.5. The obligation to keep records of events related to Regulatory risk in the field of combating NIIIMR.
- 2.7.6. Obligation to monitor the following actions:
- 1) the Company informing the Bank of Russia about probable and (or) upcoming events of Regulatory risk in the field of combating the NIIIMR recognized by the Company as significant, if the Company decides to inform the Bank of Russia about such significant events of Regulatory risk in the field of combating NIIIMR;
 - 2) compiling the Company's own lists of Insider information and making changes to them;
 - 3) compliance with the procedure for access to Insider information;
 - 4) compliance with the procedure and terms for disclosure of Insider information of the Company, the procedure and terms for disclosure of Insider information established in accordance with part 1 of article 8 of the Law;
 - 5) transfer of the list of insiders to the trade organizer, through which transactions with financial instruments are made, and to the Bank of Russia at the request of these organizations;
 - 6) sending the requests containing the information provided for in parts 1 – 3 of article 10 of the Law, as well as MAR, and providing information when the Company receives these requests;
 - 7) compliance by the persons listed in paragraphs 7 and 13 of article 4 of the Law, included in the list of insiders of the Company, and related persons with the conditions for performing operations with Financial instruments determined by the Board of Directors of the Company;
 - 8) ensuring that the Company's documents comply with the requirements in the field of combating NIIIMR and that the Company's documents are in compliance with each other.
- 2.7.7. Obligation to maintain a list of insiders;
- 2.7.8. Obligation to notify persons included in the list of Insiders about their inclusion in such a list and withdrawal from it, as well as to inform these persons about the requirements of the Law, these Regulations and Internal documents of the Company and about responsibility for the unlawful use of Insider information.
- 2.7.9. Obligation to familiarize members of the management bodies and employees of the Company with the requirements in the field of combating NIIIMR and Internal documents of the Company.
- 2.7.10. Obligation to analyze the statistics of applications (including complaints) in the field of combating NIIIMR, requests and petitions (if the specified statistics are available).
- 2.7.11. Obligation to prepare and submit to the Chairman of the Board of Directors of the Company the internal auditor's reports in the manner and within the time limits provided for by Applicable law and these Regulations, but at least once a year (hereinafter referred to as "the Reporting period").
- 2.7.12. Obligation to develop and submit recommendations for improvement of the ongoing activities in the field of combating NIIIMR and solution of the tasks set forth in this Provision to combat NIIIMR.
- 2.7.13. Obligation to inform the Chairman of the Board of Directors of the Company of all cases that prevent the internal auditor of the Company from performing his (its) functions assigned to him (it) in the field of combating NIIIMR.
- 2.7.14. Obligation to participate in the process of reviewing the Company's internal control rules in the field of combating NIIIMR.

2.8. The Company provides conditions for smooth and effective implementation by the internal auditor of its (his) functions, in particular, by vesting in the internal auditor in accordance with these Regulations the right to request information from entities in the management bodies, structural subdivisions and employees of the Company, documents and information, including explanations necessary for the performance of its (his) functions.

2.9. The Chairman of the Board of Directors undertakes to assist the internal auditor in obtaining the necessary information as soon as possible at his request, to submit questions on the necessity for making amendments to the Company's internal documents to the Board of Directors at the request of the internal auditor, to establish the remuneration system and remuneration structure of the internal auditor, which also ensures the independence of the internal auditor from other structural divisions and officers of the Company.

2.10. Reports of the internal auditor shall include information on compliance with Applicable legislation and Internal documents of the Company, on activities carried out during the Reporting period aimed at prevention and avoidance of the consequences of implementation of Regulatory risk in the field of combating NIIIMR, and in the case the violations are revealed these reports should also include the following information:

- 1) the date of making and the date of detection of each violation revealed in the reporting period,
- 2) source of detection of violations,
- 3) persons responsible for making the detected violations,
- 4) the essence of the detected violations,
- 5) information about Employees of the Company involved by the internal auditor in the investigation,
- 6) recommended disciplinary measures or other responsibility measures for persons responsible for making the detected violations,
- 7) recommended measures to prevent and eliminate violations and minimize the revealed violations,
- 8) measures taken to eliminate the revealed violations and the time limits for their implementation,
- 9) assessment of the Company's activities and compliance with applicable legislation in the field of Insider information,
- 10) statistics of requests, complaints, and requests.
- 11) other information that is relevant to the Company's compliance with the requirements for combating NIIIMR.

2.11. Based on the results of reviewing the Report on probable and (or) upcoming events of Regulatory risk in the field of combating NIIIMR, the Chairman of the Board of Directors shall inform the Company's Board of Directors about the measures and recommendations approved by him to prevent and eliminate violations and minimize Regulatory risks, and the time limits in which these measures should be implemented. The process of implementing the measures approved by the Chairman of the Board of Directors to prevent and eliminate violations and minimize Regulatory risks is organized by the internal auditor with the involvement, if necessary, of interested structural divisions and the Company's officers.

III. LIST OF THE COMPANY'S INSIDER INFORMATION

3.1. Insider information in connection with the fulfillment by the Company acting as the Issuer of the conditions set out in paragraph 2.6 of Instruction No. 3379-Y includes the information that, in accordance with the rules of the London Stock Exchange and Market Abuse Regulation (MAR), falls within the criteria of insider information, and therefore the information specified in the List approved in accordance with the established procedure by the Board of Directors of the Company is indicative only. In case of doubt, Insiders are advised to contact the internal auditor for clarification when determining how to use the information available to them.

3.2. The list of insider information approved by the Company's Board of Directors is subject to disclosure on the Internet on the Company's official website.

3.3. Insider information does not include:

- 1) information that has become available to an unlimited number of persons, in particular as a result of its dissemination;
- 2) researches, forecasts and estimates made on the basis of publicly available information in relation to Financial instruments, as well as recommendations and (or) proposals for performing operations with Financial instruments.

IV. INSIDERS

4.1. The Company maintains an insider list, which is approved by the Company's internal auditor.

4.1.1. The Company shall notify the person included in the list of insiders (or withdrawn from the list of insiders) no later than seven working days from the date of inclusion in the list of insiders (withdrawal from the list of insiders) in a manner allowing to confirm the fact that the person has received the notification.

4.1.2. In case of changes in the Company's details specified in the notifications, the Company shall inform all persons included in the list of insiders about the changes within 7 (seven) business days from the date of the changes or within 7 (seven) business days from the date when the Company learned or should have learned about the changes.

4.1.3. The Company shall keep records of all notifications sent in accordance with these Regulations; full information about them is stored for 5 (five) years from the Date of withdrawal of the person from the list of insiders.

4.1.4. The Company shall transmit the list of insiders (changes to the list of insiders) to the trade organizers and regulatory authorities within 3 (three) business days from the Date of receipt of such a request.

4.2. Inclusion of a person in the list of insiders imposes the following obligations on the person:

4.2.1. To comply with the rules for protecting the confidentiality of Insider information established by these Regulations and Applicable legislation and to comply with the Insider information use regime established by the Company.

4.2.2. Not to disclose Insider information of the Company and to avoid unlawful use of Insider information:

1) for making transactions with financial instruments, which relate to insider information, at his (its) own cost or at the cost of a third party, except for transactions made within the framework of obligation to purchase or sell financial instruments, the deadline for which has arrived, if such obligation arose as a result of the operation carried out before the person became known the insider information;

2) by transferring it to another person, except for cases when this information is transferred to a person included in the list of insiders in connection with the performance of duties established by the Federal laws, or in connection with the performance of obligations under labor or civil law contracts;

3) by making recommendations to third parties, obliging or otherwise encouraging them to purchase or sell financial instruments; and

4) in each case in accordance with the Group Securities Dealing Code and PDMR Securities Dealing Code.

4.2.3. Not to carry out actions related to market manipulation in accordance with the Applicable laws.

4.2.4. To provide (if the persons listed in parts 1 - 3 of article 10 of the Law receive a request for information specified in parts 1 - 3 of article 10 of the Law stating the period for which the information must be provided and sent in a way that allows confirming the fact of its receipt by the Insider to the requesting person) a response containing the requested information, within the period specified in such request, which may not be less than 10 business days from the date of receipt of the request by the insider.

V. PROCEDURE FOR ACCESS TO INSIDER INFORMATION AND RULES FOR KEEPING IT CONFIDENTIAL

5.1. The Company takes all necessary actions and introduces special measures aimed at protecting Insider information from unlawful use. These measures are introduced for:

5.1.1. preventing access to insider information by any persons other than those who need such information to perform their functional duties;

5.1.2. ensuring control over the activities of Insiders based on the established restrictions on use and disposal of Insider information;

- 5.1.3. ensuring compliance with the procedure for using and disposing of Insider information, in particular by excluding its unlawful use by Insiders acting not to the best interests of the Company;
- 5.1.4. increasing the level of confidence in the Company by investors and contractors.
- 5.2. Measures aimed at protecting Insider information that may be established by the Company include:
- 5.2.1. granting the right of access to the use of insider information to a limited number of persons;
- 5.2.2. recording the persons who possess Insider information by including them in the list of insiders and notifying them about it;
- 5.2.3. granting the access rights or restricting the access to Insider information to employees of the Company on the basis of employment contracts and contractors – on the basis of civil law contracts;
- 5.2.4. inclusion in labor and/or civil law contracts with persons who, in the performance of the relevant contracts, have the right to access to Insider information, the provisions establishing the obligation of such persons not to disclose Insider information and comply with the requirements of these Regulations, as well as immediately notify the persons exercising control over the use of Insider information about the facts of loss of documents and other material carriers containing Insider information;
- 5.2.5. the use of special names for certain transactions /projects, indicating the confidentiality of information on physical carriers containing it;
- 5.2.6. timely destruction of all the documents that are not stored that may contain Insider information;
- 5.2.7. the introduction of procedures for protection of workplaces and places of keeping the documents from unimpeded access and surveillance;
- 5.2.8. using the systems protecting information and technical systems protecting against loss of information and unauthorized access to information, in particular via communication channels;
- 5.2.9. introduction of a ban on discussing Insider information outside the office premises, i.e. in places where this information can be heard by third parties;
- 5.2.10. other measures aimed at restricting access to Insider information.
- 5.3. In order to protect the Insider information the Company shall:
- 5.3.1. provide (against signature) the members of management bodies and employees whose access to the Insider information is necessary to perform their job duties with requirements to combat NIIMR, these Regulations and other Internal documents of the Company;
- 5.3.2. perform other actions aimed at ensuring the procedure for using Insider information in accordance with the Applicable legislation and Internal documents of the Company.
- 5.4. An employee's access to Insider information is subject to his / her consent, if this is not provided for by his / her employment obligations.
- 5.5. In order to protect the confidentiality of Insider information the employee of the Company is obliged:
- 5.5.1. to comply with the Insider information usage regime established by the Company;
- 5.5.2. not to disclose or transfer to other persons the Company's Insider information, except as expressly provided for by Applicable law, Internal documents of the Company or agreements concluded with the Company, and not to use this information for personal purposes without the Company's consent;

5.5.3. not to disclose the Company's Insider information for 5 (five) years after the termination of the employment contract or for a longer period stipulated in the employment contract or other agreement between the employee and the Company, except for cases expressly provided for by Applicable law and Internal documents of the Company;

5.5.4. after expiration or termination of the employment contract or at any time on first demand of the Company to deliver to the Company all the material carriers of information containing Insider information that are in the employee's possession, and to confirm in writing permanent deletion of all Insider information from all media;

5.5.5. to follow the established procedure of using the Insider information and to carry out the commercial secret regime established by the Company.

5.6. Protection of Insider information within the framework of civil law relations.

5.6.1. Relations between the Company and its counterparty regarding the use and protection of Insider information are regulated by Applicable law and the agreement between the Company and the counterparty.

5.6.2. The counterparty is obliged to inform the Company immediately about the fact of disclosure or threatened disclosure of Insider information, illegal receipt or illegal use of Insider information by the counterparty or a third parties or in the case where such fact is known to him (it).

5.6.3. The counterparty may not disclose Insider information or unilaterally terminate the protection of its confidentiality until the agreement expires, unless otherwise stipulated in the agreement.

5.6.4. The Company shall take measures to protect the confidentiality of Insider information until it comes in public domain.

VI. PROCEDURE FOR USING INSIDER INFORMATION

6.1. Lawful use of Insider information takes place in cases where the Insider information is used in the interests of the Company, to ensure production, economic, financial and other activities of the Company in accordance with Applicable law, these Regulations, the Company's Articles of Association on the basis of job descriptions adopted in accordance with them or other internal documents of the Company (provisions, regulations, orders, instructions and other internal documents of the Company), as well as on the basis of an agreement with the Company.

6.2. Unlawful use of Insider information means any use of Insider information made in breach of the conditions provided for in clause 6.1 of these Regulations.

6.3. The Company provides access to the Company's Insider information to an unlimited number of persons by publicly disclosing it in accordance with Applicable law.

VII. PROCEDURE AND TERMS FOR DISCLOSURE OF INSIDER INFORMATION

7.1. The Company's Insider information is to be disclosed as soon as possible unless otherwise provided by applicable laws.

7.2. The Company provides free and burden-free access to the Insider information subject to disclosure to any parties concerned, regardless of the purpose of obtaining it; the methods of disclosing are as follows:

7.2.1. Publishing a press release (a notice of material fact) stating that the information communicated is Insider information:

7.2.1.1. in the newswire of the information agency, and to a regulatory information service in the United Kingdom as soon as possible. If such regulatory information service is not open for business, by distributing the information to not less than two national newspapers in the United Kingdom; two newswire services operating in the United Kingdom; and a regulatory information service for release as soon as it opens;

7.2.1.2. on the Company's page in the Internet as soon as possible;

7.2.2. Posting on the Company's page in the Internet of the text of documents approved by the Company in accordance with the prescribed procedure and subject to disclosure, not later than 2 (two) days from the date of approval or signing of the relevant document or after making up minutes of the meeting of shareholders of the Company or after publication of information on the state registration of the issuance documents or the receipt of the notification of the registering authority, as well as publication in the news reports about the procedure of access to Insider information contained in the document of the Company: no later than 1 (one) day from the date of publication of the document text.

7.2.3. With effect from the time of its disclosure, the information ceases to be Insider information.

VIII. RESPONSIBILITY FOR UNLAWFUL USE AND DISPOSAL OF INSIDER INFORMATION AND IMPROPER COMPLIANCE WITH THE REQUIREMENTS OF APPLICABLE LEGISLATION ON COMBATING THE UNLAWFUL USE OF INSIDER INFORMATION

8.1. The Company and the Insider are responsible for unlawful use, disclosure or distribution of the Insider information in accordance with the applicable laws.

8.2. Disciplinary measures may be applied to violating employees of the Company who are on employment with it; the decision on these measures is made in accordance with the Applicable laws and Internal documents of the Company.

8.3. Insiders may be held liable for reporting or transmitting Insider information to a third party. In addition to the Insider, the addressee of Insider information who performs operations with financial instruments on the basis of Insider information which was provided or illegally obtained may be held liable for performing operations with financial instruments on the basis of Insider information, except in cases of unlawful use of Insider information where the addressee of Insider information did not know and must not have known that such information is the Insider information.

8.4. The addressee of Insider information assumes the duties of an Insider, and at the same time he (she) is responsible for performing Operations based on material information that is not publicly available, illegally transmitted to him by an Insider. In the same way that an Insider is responsible for transactions made by the addressee of Insider information based on Insider information, the addressee of Insider information is also responsible if he (she) transfers this information to another person who performs operations with financial instruments, foreign currency and/or goods based on this information. In other words, the responsibility of the recipient of Insider information for performing Operations based on Insider information does not differ from the responsibility of the Insider.

ANNEX 1 to Rules of internal control to prevent, reveal and suppress unauthorized use of insider information and (or) market manipulation

I, _____, hereby certify that I have read the text of the Rules of internal control to prevent, reveal and suppress unauthorized use of insider information and (or) market manipulation and agree to observe them.