

X5 RETAIL GROUP N.V.
(THE “COMPANY”)

DECLARATION OF GDR HOLDERS

PLEASE RETURN THIS FORM WITH SUPPORTING DOCUMENTS TO INFO@X5.COM

I, _____ [full name], born in _____ on ____ ____, residing at _____, with _____ passport number _____ or _____

We, _____ [legal entity], established under the laws of _____ and registered at _____ with company registration number _____,

hereby declare and confirm the following:

Acknowledgement of Global Depositary Receipts

I/we declare that I/we hold _____ [number] of global depositary receipts (“GDRs”) of X5 Retail Group N.V. (the “Company”).

1. Declaration of Ownership

I/we, unconditionally declare that neither I/we, as an individual or legal entity, nor any associated Ultimate Beneficial Owner (the “UBO”), (collectively, the “GDR Owners”), currently hold, directly or indirectly, any securities or other legal or beneficial interest (in any form) in X5 Corporate Center PJSC (formerly X5 Corporate Center LLC, hereinafter “X5CC”) or any of its subsidiaries or affiliates. Furthermore, I/we confirm that the GDR Owners have not, at any time in the past, directly or indirectly owned any such securities or interests in X5CC or its subsidiaries/affiliates, with the sole exception of a potential indirect interest in X5CC that may arise exclusively through my/our ownership of GDRs in the Company.

2. GDRs acquired after 3 May 2024

With respect to any GDRs acquired after 3 May 2024 the GDR Owners declare that none of the previous owners or beneficiaries of such GDRs have directly or indirectly participated in the distribution of X5CC shares nor is any such person a direct or indirect X5CC shareholder.

3. Data Exchange Consent:

The GDR Owners agree to the exchange of necessary data with X5CC, enabling the Company to verify that:

- The GDR Owners do not own, and have not owned, any securities or other legal or beneficial interest in X5CC, other than a potential entitlement to a portion of the remaining indirect interests held solely through the GDR Owners ownership of GDRs in the Company, and;
- the Company may verify with X5CC that sellers of GDRs acquired after 3 May 2024, as well as the previous owners of such GDRs, have not participated in the distribution of X5CC shares.

4. Verification Requirements:

For verification purposes, I/we provide the following documents to evidence my/our entitlement to the GDRs:

- **Entitlement to the GDRs:** a certified bank/broker statement or equivalent document confirming the amount of GDRs held in my/our name as of the date of this Declaration, including date of acquisition of such GDRs and, with respect to GDRs acquired since 3 May 2024, documents evidencing the full chain of ownership. (The Company may request additional confirmation from the bank/broker)
- **For natural persons:** a notarised and apostilled copy of my passport;

- **For legal entities:**
 1. an extract of the legal entity's registration with the relevant trade register (or incumbency certificate);
 2. legal evidence of the signatory's authorization to act on behalf of the legal entity; and
 3. a notarised and apostilled copy of the signatory's passport(s).(The Company may additionally request a Beneficial Ownership Declaration);
- **X5CC Confirmation:** a completed Annex A (including personal data consent) which has to be submitted to X5CC, requesting confirmation that the GDR Owners (as defined above) did not acquire direct ownership in X5CC, to be forwarded by X5CC to the Company;

By signing below, the GDR Owners affirm that the above statements are true and correct.

Name of GDR Holder (natural person or legal entity): _____

Email: _____

Phone number: _____

Signature (authorized signatory if legal entity):

Date: _____

ANNEX A

Request for Confirmation of Non-Ownership in X5 Corporate Center PJSC

To: X5 Corporate Center PJSC (“**X5CC**”)

By email: DR_holder@x5.ru

From: [Insert Name of DR Holder (Individual or Legal Entity)]

Address: [_____]

Email: [_____]

Date: [_____]

Subject: Request for Confirmation of Non-Ownership in X5CC

Dear Sir/Madam,

I/we, the undersigned, hold _____ Global Depositary Receipts (“**GDRs**”) of X5 Retail Group N.V. (the “**Company**”) and are seeking to qualify as an Eligible Depositary Receipt (“**DR**”) holder under the Company’s depositary program administered by Stichting STAK X5 Retail Group (“**STAK**”).

Pursuant to the verification requirements of the Company, I/we request that X5CC confirm that I/we, as an individual or legal entity, and any associated Ultimate Beneficial Owner (“**UBO**”), as well as the previous owners of the GDRs in the period between the date of purchase of the GDRs by the Declarant and 3 May 2024 (if any), do not currently hold, nor have ever held, directly or indirectly, any securities or other legal or beneficial interest in X5CC or its subsidiaries or affiliates, other than a potential entitlement to a portion of the remaining indirect interests in X5CC held solely through my/our ownership of GDRs in the Company.

Details of the Declarant:

- Full Name (Individual or Legal Entity): _____

- For Legal Entities, UBO Name(s): _____

- GDR Holding (Number of GDRs): _____

- Date(s) of GDR Acquisition: _____

- For GDRs Acquired After 3 May 2024, Chain of Ownership (if applicable): _____

Personal Data Consent:

I/we (insert full name, last name, date of birth, number of primary personal identification number, date of issue of such document and issuing authority, address) hereby give to X5 Retail Group N.V., address: Zuidplein 196, 1077 XV Amsterdam, the Netherlands, with company number 33143036 and to PJSC X5 Corporate Centre, address: 28 Srednyaya Kalitnikovskaya St., building 4, Moscow, 109029, OGRN 1247700463911 (the “**Operators**”) my/our full consent to voluntarily, in my/our own interest (the “**Consent**”):

- A. share automated, non-automated, mixed processing of my/our personal data, including but not limited to: surname, first name, patronymic; date of birth; citizenship(s); passport or other identity document details; registered residence address and (if applicable) registered temporary address; actual residence address; contact telephone number; e-mail address; details of the relevant securities ownership and securities account (the “**Personal Data**”) by the following methods: collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, analysis, comparison, use, blocking, deletion, destruction, transfer

(provision, access) to third parties, for the purpose of the Declarant's participation in the process of becoming an eligible DR holder under the administration conditions of STAK, and

B. entrust third parties to process Personal Data in any manner for the above purposes.

The Declarant gives the Consent for the period of validity from the date of providing the Consent until the earliest of the following dates: the date of withdrawal of the Consent by the Declarant or the date of achievement of the purposes of Personal Data processing. In this case, the purposes of processing Personal Data shall be valid for the entire duration of the Declarant's participation in the process of becoming an eligible DR holder under the administration conditions of STAK.

The Consent may be withdrawn by the Declarant by sending a written application to the Operators by postal mail to the following address: X5 Retail Group N.V., Zuidplein 196, 1077 XV Amsterdam, the Netherlands and X5 Corporate Center PJSC, 28 Srednyaya Kalitnikovskaya St., building 4, Moscow, 109029. The Declarant hereby acknowledges that it has been notified that if the Declarant withdraws the Consent, the Declarant's participation in the process of becoming an eligible DR holder under the administration conditions of STAK will not be possible, and agrees to this.

X5CC Confirmation:

X5CC hereby confirms that, based on its records, the above-named Declarant and any associated Ultimate Beneficial Owner(s) and the previous owners of such GDRs in the period between 3 May 2024 and the date of purchase of the GDR by the Declarant (if any) do not currently hold, nor have ever held, directly or indirectly, any securities or other legal or beneficial interest in X5CC or its subsidiaries or affiliates, other than a potential entitlement to a portion of the remaining indirect interests in X5CC held solely through ownership of GDRs in the Company

Signature (X5CC Authorized Representative)

Name and Title: _____

Date: _____

I/we kindly request that X5CC provide this written confirmation to the Company at stak@x5.com with a copy to me/us at the email address provided above.

By signing below, I/we affirm that the information provided in this form is true and correct.

Signature

Name: _____

Date: _____