

**THE 2013 ARBITRATION RULES OF THE UNITED NATIONS COMMISSION ON
INTERNATIONAL TRADE LAW**

OOO MANOLIUM-PROCESSING

Claimant

v.

REPUBLIC OF BELARUS

Respondent

CHRONOLOGY OF EVENTS

19 July 2019

INTRODUCTION TO THE CHRONOLOGY OF EVENTS

1. In accordance with paragraphs 11 and 12 of Procedural Order No. 1 dated 17 May 2018, the parties hereby submit an agreed chronology of events dated 19 July 2019 (the “**Chronology**”).
2. Where the parties adopt different definitions of the same term in their submissions, the parties have included the Respondent’s definition of the respective term in square brackets after the Claimant’s definition.
3. The parties did not intend for the Chronology to contain an exhaustive list of all events referred to in the parties’ submissions.

CHRONOLOGY OF EVENTS

Date	Event	Evidence
24 April 2003	MCEC initiated the Tender relating to the construction of the Communal Facilities and the Investment Object.	Exhibit C-28. Tender documents for the Tender dated 24 April 2003.
22 May 2003	The Claimant filed an application to participate in the Tender.	Exhibit C-30. Claimant's bid to participate in the Tender dated 22 May 2003.
30 May 2003	The Tender Commission declared the Claimant the winner.	Exhibit C-31. Protocol 2 on the results of the Tender dated 30 May 2003.
4 June 2003	MCEC notified the Claimant of the Tender results.	Exhibit C-32. Letter from MCEC to the Claimant dated 4 June 2003.
5 June 2003	MCEC issued a decision to approve the Tender results.	Exhibit C-33. Decision of MCEC on approving the results of the Tender dated 5 June 2003.
6 June 2003	MCEC, Minsktrans and the Claimant concluded the Investment Contract.	Exhibit C-34. Investment Contract.
10 October 2003	Additional Agreement No. 1 to the Investment Contract was signed by MCEC, Minsktrans and the Claimant.	Exhibit C-47. Additional Agreement No. 1.
22 October 2003	Additional Agreement No. 2 to the Investment Contract was signed by MCEC, Minsktrans and the Claimant.	Exhibit C-48. Additional Agreement No. 2.
30 October 2003	The Council of Ministers of the Republic of Belarus informed the President that Additional Agreement No. 2 had been signed and that the Council of Ministers considers reasonable to approve the project.	Exhibit C-46. Letter from the Council of Ministers of the Republic of Belarus to the President of the Republic of Belarus dated 30 October 2003.

Date	Event	Evidence
5 November 2003	The President of Belarus approved the implementation of the project.	Exhibit C-45. Resolution of the President of the Republic of Belarus dated 5 November 2003.
24 November 2003	MCEC approved a version of the Technical Specification for construction of the Depot. This Technical Specification was subsequently changed.	Exhibit C-238. Technical specification of Minsktrans for design and construction of the Trolleybus Depot of 24 November 2003 Fourth WS of Mr Dolgov, paragraph 23.
25 November 2003	Additional Agreement No. 3 to the Investment Contract was signed by MCEC, Minsktrans and the Claimant.	Exhibit C-49. Additional Agreement No. 3.
9 December 2003	The Claimant and Minsktrans concluded the contract for design and construction of the Depot, Building for Reconstruction and the Motor Transport Base.	Exhibit C-225. Contract for conditions of design and construction of Communal Facilities between Minsktrans and Claimant of 9 December 2003
30 December 2003	Manolium Trading Ltd. paid the Library Payment to the account of the Ministry of Finance of Belarus.	Exhibit C-50. Confirmation of the Library Payment dated 30 December 2003.
18 March 2004	MCEC issued a decision to register Manolium-Engineering in the Unified State Register of Legal Entities and Individual Entrepreneurs of Belarus.	Exhibit C-5. Certificate of state registration of Manolium-Engineering in the Unified State Register of Legal Entities and Individual Entrepreneurs dated 24 March 2004.

Date	Event	Evidence
15 July 2004	<p>MCEC issued a decision:</p> <ul style="list-style-type: none"> a. approving the land plot location selection act for the construction of the Depot; and b. allowing Manolium-Engineering to prepare Construction Documents [Design Specifications and Estimate Documentation] for the Depot. 	Exhibit C-53. Decision of MCEC dated 15 July 2004.
2 December 2004	MCEC's chairman authorised his deputy to execute an additional agreement adding Manolium-Engineering as a party to the Investment Contract.	Exhibit C-40. Decision of MCEC dated 2 December 2004.
13 January 2005	Minsktrans proposed several amendments and additions to the Investment Contract, including change of one of the parties due to reorganization of Minsktrans and excluding the Building under Reconstruction from the list of communal facilities.	C-226. Minsktrans letter to Minsk City Executive Committee of 13 January 2005.
19 January 2005	Manolium-Engineering sent a letter to MCEC alleging numerous discrepancies in implementation of the investment project and asking MCEC to grant right to use additional land plots in the center of Minsk for development of “5 – 6 residential houses” and to grant right to develop another mall at F. Skoriny prospect, a plant and reconstruct and purchase built-in offices at Lenina street.	Exhibit C-54. Letter from Manolium-Engineering to MCEC of 19 January 2005.
21 February 2005	Manolium-Engineering notified MCEC that it was suspending the works until the execution of an additional agreement to the Investment Contract.	Exhibit C-62. Letter from Manolium-Engineering to MCEC dated 21 February 2005

Date	Event	Evidence
23 February 2005	Manolium-Engineering approved the preliminary key technical and economic indexes of the Investment Object.	Exhibit C-110. Composition and the key technical and economic indexes for the Investment Object approved by Manolium-Engineering on 23 February 2005.
9 June 2005	The Committee for Architecture [the Architecture Committee] refused to submit to MCEC a draft decision allowing Manolium-Engineering to develop the city-planning design of the block where the Investment Object was to be located.	Exhibit C-111. Letter from the Committee for Architecture and City Planning to the Committee for Economy of MCEC dated 9 June 2005.
14 June 2005	MCEC applied to the Belarusian SCC seeking approval for Manolium-Engineering to be added as a party to the Investment Contract	Exhibit R-25. Letter from MCEC to the Belarusian SCC dated 14 June 2005
15 September 2005	Belgosekspertiza confirmed the compliance of the architectural plan of the Depot with regulatory acts subject to certain comments, including that the Depo could only be commissioned after the construction of the Road.	Exhibit C-223. Report of Republican Unitary Enterprise Belgosekspertiza [Belarusian state expert review] of the Ministry of Construction and Architecture of the Republic of Belarus of 17 September 2005
18 October 2005	Minsk Land Planning Service sent to the land surveyor Manolium-Engineering's application to be allowed to commence the preparation of the land plot allocation plan for the Depot.	Exhibit R-166. Letter from Minsk Land Planning Service to RUP Belgiprozem and Manolium-Engineering dated 18 October 2005
5 January 2006	MCEC sent draft addendum to the Investment Contract to the Claimant, including amendments due to merger of enterprises to form Minsktrans and change of name of Varshaveni Street.	Exhibit C-221. Letter from Minsk City Executive Committee to Claimant of 5 January 2006 (with draft Addendum to the Investment Contract)

Date	Event	Evidence
16 March 2006	UP [Unitary Enterprise] Minskgrado informed Manolium-Engineering that in order to continue the works under agreement No. 112/2004 “Detailed plan of the quarter between Kiseleva – Krasnaya – Varvasheni streets and Skoriny prospect” Manolium-Engineering had to submit an MCEC decision relating to this.	Exhibit C-112. Letter from UP Minskgrado to Manolium-Engineering dated 16 March 2006.
24 March 2006	The Claimant asked the assistant to the President of the Republic of Belarus to provide assistance with respect to the implementation of the Investment Contract.	Exhibit C-63. Letter from Manolium-Engineering to the assistant to the President of the Republic of Belarus dated 24 March 2006.
18 April 2006	<p>The Claimant proposed certain amendments to the Investment Contract, including that it would construct the New Communal Facilities instead of the Communal Facilities.</p> <p>The Claimant stated that pursuant to its preliminary calculations, the construction cost of the New Communal Facilities may reach US\$ 15.0 – 17.0 million</p>	Exhibit R-169. Letter from the Claimant to MCEC dated 18 April 2006
26 May 2006	MCEC applied to the President of Belarus to approve amendments to the Investment Contract.	Exhibit C-35. Letter from MCEC to the President of the Republic of Belarus dated 26 May 2006.
30 May 2006	Architecture and City Planning Committee approved the construction plan for the Depot noting, <i>inter alia</i> , the need to construct the Road.	Exhibit C-350. Opinion from the Minsk Architecture and City Planning Committee of 30 May 2006
11 July 2006	The President of Belarus approved amendments to the Investment Contract and confirmed that the Claimant would obtain the lease rights to the land plot for the Investment Object and the ownership title to the Investment Object upon its completion.	Exhibit C-64. Resolution of the President of the Republic of Belarus dated 11 July 2006.

Date	Event	Evidence
29 September 2006	The head of MCEC authorised his deputy to execute an additional agreement to the Investment Contract.	Exhibit C-51. Order of MCEC dated 29 September 2006.
8 February 2007	Additional Agreement No. 4 (the Amended Investment Contract) was concluded between MCEC, Minsktrans, the Claimant and Manolium-Engineering.	Exhibit C-66. Additional Agreement No. 4.
13 February 2007	Manolium-Engineering asked the land surveyor to start working on the land plot allocation plan for the Depot.	Exhibit R-171. Letter from Manolium-Engineering to RUP Belgiprozem dated 13 February 2007.
20 March 2007	Manolium-Engineering approved the Construction Documents [Design Specifications and Estimate Documentation] for the Depot.	Exhibit C-67. Order of Manolium-Engineering No. 1-C dated 20 March 2007.
27 March 2007	MCEC received the land plot allocation plan for the land plot for constructing the Depot from UP Belgiprozem.	Exhibit R-28. Cover page of the land plot case file for the Depot.
4 May 2007	Manolium-Engineering requested MCEC to put on the agenda of MCEC the question of granting a temporary right to use the land plot for construction of the Depot to Manolium-Engineering.	Exhibit C-227. Letter from Manolium-Engineering to Minsk City Executive Committee of 4 May 2007.
7 May 2007	Minsk Land Management and Geodetic Service asked Construction and Housing Policies Committee to calculate the cadaster value of the land plots for construction of the Depot.	Exhibit C-228. Letter from Minsk Land Management and Geodetic Service to Construction and Housing Policies Committee Manolium-Engineering of 7 May 2007.

Date	Event	Evidence
24 May 2007	<p>MCEC decided to:</p> <ul style="list-style-type: none"> a. issue Manolium-Engineering a permit to the land plots for constructing the Depot valid until 1 August 2009; b. approve the land plot location selection act for the Road. 	<p>Exhibit C-68. Extract from the decision of MCEC dated 24 May 2007 (paragraphs 17 and 21).</p> <p>Exhibit R-29. Extract from the decision of MCEC dated 24 May 2007 (paragraph 5).</p> <p>Exhibit C-229. Architectural Planning task for the Road of 14 June 2007.</p>
25 – 27 June 2007	<p>Manolium-Engineering applied for registration of the right of temporary use of the land plots for the construction of the Depot</p>	<p>Exhibit C-69. Certificate of registration of the right of temporary use granted to Manolium-Engineering in respect of the land plots for the construction of the Depot dated 29 June 2007.</p>
29 June 2007	<p>The rights of temporary use of the land plots for the construction of the Depot granted to Manolium-Engineering were registered.</p>	<p>Exhibit C-69. Certificate of registration of the right of temporary use granted to Manolium-Engineering in respect of the land plots for the construction of the Depot dated 29 June 2007.</p>
16 July 2007	<p>Manolium-Engineering applied to Gosstroy for a construction permit for the Depot valid until September 2008</p>	<p>Exhibit R-30. Letter from Manolium-Engineering to Gosstroy dated 16 July 2007</p>
16 July 2007	<p>Gosstroy:</p> <ul style="list-style-type: none"> a. issued the construction permit for Manolium-Engineering to start preparing the construction site; b. explained to Manolium-Engineering that, under Belarusian law, Gosstroy could not issue the construction permit for other works until Manolium-Engineering provided a copy of Manolium- 	<p>Exhibit R-31. Letter from Gosstroy to Manolium-Engineering dated 16 July 2007.</p> <p>Exhibit R-32. Construction permit for preparing the construction site dated 16 July 2007.</p>

Date	Event	Evidence
	Engineering's agreements with its subcontractors and rectified the shortcomings of the Construction Documents [Design Specification and Estimate Documentation] identified in the Expert Approval of the Design Specification and Estimate Documentation.	
4 October 2007	Manolium-Engineering re-applied to Gosstroy for the construction permit for the Depot valid until 1 April 2008.	Exhibit R-33. Letter from Manolium-Engineering to Gosstroy dated 4 October 2007.
5 October 2007	Manolium-Engineering prepared the construction site for the Depot	Exhibit R-34. Confirmation that preparatory works are completed and the object is ready for construction dated 5 October 2007.
15 October 2007	Manolium-Engineering obtained a permit to construct the Depot valid until 30 January 2008.	Exhibit C-70. Construction permit issued by Gosstroy for constructing the Depot dated 15 October 2007.
5 November 2007	Manolium-Engineering applied to MCEC for the Investment Object Location Selection Act [Investment Object Location Act].	Exhibit C-114. Letter from Manolium-Engineering to MCEC dated 5 November 2007.
5 December 2007	MCEC confirmed to UP Belgiprozem (the land surveyor for the purpose of preparing the initial land planning documents for the Investment Object) its preliminary agreement to allocate the land plot for the Investment Object.	Exhibit R-35. Letter from MCEC to UP Belgiprozem dated 5 December 2007.
30 January 2008	Manolium-Engineering requested extension of permit of Gosstroy for the duration of the set time-limit [statutory term] for construction of the Depot.	Exhibit C-261. Letter from Manolium-Engineering to Gosstroy of 30 January 2008
4 February 2008	The Minsk Architecture and City Planning Committee of the MCEC approved construction project of the Road.	Exhibit C-232. Opinion of Minsk Architecture and City Planning Committee of Minsk City Executive Committee of 4 February 2008

Date	Event	Evidence
7 February 2008	Gosstroy issued to Manolium-Engineering a construction permit in respect of the Depot valid until 1 September 2008.	Exhibit C-262. Construction permit issued by Gosstroy for constructing the Depot of 7 February 2008.
20 March 2008	Manolium-Engineering approved the Construction Documents [Design Specification and Estimate Documentation] for the Road.	Exhibit C-85. Order of Manolium-Engineering No. 1-C dated 20 March 2008.
10 April 2008	Manolium-Engineering approved the Construction Documents [Design Specifications and Estimate Documentation] for the Pull Station.	Exhibit C-96. Order of Manolium-Engineering No. 3-C dated 10 April 2008.
10 April 2008	MCEC received the land plot allocation plan for the Road from UP Belgiprozem.	Exhibit R-45. Cover page of the land plot case file for the Road.
2 May 2008	MCEC issued a permit to the land plots for the construction of the Road valid until 1 December 2008.	Exhibit C-86. Decision of MCEC dated 2 May 2008.
22 May 2008	Manolium-Engineering applied to Gosstroy for extension of permit for construction of the Road until 31 December 2008.	Exhibit C-272. Letter from Manolium-Engineering to Gosstroy of 22 May 2008.
29 May 2008	Manolium-Engineering applied to Gosstroy for a construction permit for the Road.	Exhibit R-36. Summary form, information about the Road.
29 May 2008	Gosstroy issued to Manolium-Engineering a construction permit in respect of the Road valid until 31 October 2008.	Exhibit C-87. Construction permit issued by Gosstroy dated 29 May 2008.
30 May 2008	MCEC issued a decision permitting the construction of the Pull Station on one of the land plots designated for the Depot.	Exhibit C-97. Decision of MCEC dated 30 May 2008.
18 June 2008	Manolium-Engineering applied to Gosstroy for a construction permit for the Pull Station.	Exhibit R-37. Summary form, information about the Pull Station.

Date	Event	Evidence
19 June 2008	Gosstroy issued the construction permit for the Pull Station.	Exhibit C-98. Construction permit for the Pull Station dated 19 August 2009 (last line). Exhibit R-37. Summary form, information about the Pull Station.
8 August 2008	Manolium-Engineering applied for state registration of its right to use the land plots for the construction of the Road.	Exhibit C-88. Certificate of registration of the right of temporary use granted to Manolium- Engineering in respect of the land plots for the construction of the Road dated 20 August 2008.
20 August 2008	The right of temporary use of the land plots for Manolium-Engineering to construct the Road was registered.	Exhibit C-88. Certificates of registration of the right of temporary use granted to Manolium-Engineering in respect of the land plots for the construction of the Road dated 20 August 2008.
11 September 2008	Manolium-Engineering approached MCEC to extend the deadline for putting the Depot into operation (i.e. commissioning it) from December 2008 until June - July 2009.	Exhibit C-71. Letter from Manolium-Engineering to MCEC dated 11 September 2008.

Date	Event	Evidence
September – December 2008	The Claimant and Manolium-Engineering informed MCEC about the financial difficulties they were experiencing as a result of the financial crisis, requesting to postpone the deadline for the construction and commissioning of the New Communal Facilities.	Exhibit R-38. Letter from the Claimant to MCEC dated 22 September 2008. Exhibit R-39. Minutes of the meeting attended by MCEC, Minsktrans and Manolium-Engineering dated 7 October 2008. Exhibit R-40. Letter from the Claimant to MCEC dated 14 October 2008; Exhibit R-41. Letter from Manolium-Engineering to MCEC dated 19 November 2008.; Exhibit R-42. Letter from the Claimant to MCEC dated 1 December 2008, Exhibit R-44. Letter from Manolium-Engineering to MCEC dated 31 December 2008.
10 December 2008	A meeting took place involving, among others, representatives of MCEC and Manolium-Engineering. It was decided following the meeting that: <ul style="list-style-type: none"> a. an additional agreement to the Amended Investment Contract would be executed postponing the deadline for the construction and commissioning of the New Communal Facilities to 3 July 2009; b. Mr Dolgov would ensure that the Pull Station was commissioned by 1 January 2009; and c. Mr Dolgov would ensure that all debts owed to contractors would be repaid in full by 20 December 2008. 	Exhibit R-43. Minutes dated 19 December 2008 of the meeting which took place on 10 December 2008, items 1, 4 and 6.
16 December 2008	Additional Agreement No. 5 to the Amended Investment Contract was signed by the Claimant, Manolium-Engineering, MCEC and Minsktrans.	Exhibit C-72. Additional Agreement No. 5.

Date	Event	Evidence
31 December 2008	Manolium-Engineering asked MCEC to postpone the deadline for commissioning the Pull Station from 1 January 2009 (as was resolved at the meeting that took place on 10 December 2008) to 1 March 2009.	Exhibit R-43. Minutes dated 19 December 2008 of the meeting which took place on 10 December 2008, item 4. Exhibit R-44. Letter from Manolium-Engineering to MCEC dated 31 December 2008.
22 January 2009	MCEC extended the period of temporary use of the land plots for Manolium-Engineering until 1 July 2009 to complete the Road construction.	Exhibit C-89. Decision of MCEC dated 22 January 2009.
27 February 2009	UP Belgirpozem sent to MCEC the documents necessary for approving the Investment Object Location Selection Act [Investment Object Location Act].	Exhibit R-160. Cover page to the case file for the Investment Object Location Selection Act [Investment Object Location Act] with Belgiprozem note dated 27 February 2009.
25 March 2009	MCEC approved the Investment Object Location Selection Act [Investment Object Location Act].	Exhibit C-116. Investment Object Location Selection Act dated 25 March 2009.
27 March 2009	<p>Manolium-Engineering:</p> <ul style="list-style-type: none"> a. asked MCEC to postpone the deadline for commissioning the Pull Station from 1 January 2009 (as was resolved at the meeting that took place on 10 December 2008) to July 2009; b. informed MCEC that it would endeavor to pay all outstanding debts to contractors (that had to be paid by 20 December 2008 as was resolved at the meeting that took place on 10 December 2008) in April – May 2009. 	Exhibit R-43. Minutes dated 19 December 2008 of the meeting which took place on 10 December 2008, items 4 and 6. Exhibit R-47. Letter from Manolium-Engineering to the Economic Committee of MCEC dated 27 March 2009.

Date	Event	Evidence
March – June 2009	Manolium-Engineering informed MCEC about the financial difficulties it was experiencing as a result of the financial crisis.	Exhibit R-47. Letter from Manolium-Engineering to the Economy Committee of MCEC dated 27 March 2009. Exhibit R-48. Letter from Manolium-Engineering to MCEC dated 15 April 2009. Exhibit R-50. Minutes of the meeting dated 25 June 2009.
10 June 2009	<p>During a meeting held on 10 June 2009, a representative of Manolium-Engineering, Mr [REDACTED]:</p> <ul style="list-style-type: none"> a. assured MCEC that the construction works in relation to the Pull Station would be finished by 1 July 2009 “<i>subject to delay-free funding by the investor</i>”; b. admitted that Manolium-Engineering still owed 405.31 million denominated Belarusian rubles to its contractors and was taking measures to repay the debt. 	Exhibit R-49. Minutes of the meeting dated 10 June 2009, items 2.2.2 and 2.2.3.
3 July 2009	The deadline passed for the construction and commissioning of the New Communal Facilities as agreed under Additional Agreement No. 5.	Exhibit C-72. Additional Agreement No. 5.
13 July 2009	Manolium-Engineering applied to MinsIngProject to amend the design of the Road.	C-241. Letter from Manolium-Engineering to Unitary Enterprise <i>MinskIngProject</i> of 13 July 2009.

Date	Event	Evidence
4 August 2009	It was resolved at a meeting involving, among others, MCEC, Minsktrans and Manolium-Engineering, that an additional agreement would be executed extending the term for the construction and commissioning of the New Communal Facilities until 10 May 2010 if Manolium-Engineering completed the construction of and commissioned the Pull Station and the Road by 1 October 2009.	Exhibit R-52. Minutes of the meeting dated 4 August 2009.
19 August 2009	Gosstroy extended Manolium-Engineering's construction permit for the Pull Station until 31 October 2009.	Exhibit C-98. Construction permit issued by Gosstroy for construction of the Pull Station dated 19 August 2009.
3 September 2009	MCEC extended the period for temporary use of the land plots for construction of the Depot and the Road until 1 August 2010.	Exhibit C-73. Decision of MCEC dated 3 September 2009. Exhibit C-263. Decision of Minsk City Executive Committee of 3 September 2009.
1 October 2009	Manolium-Engineering and the Claimant failed to complete the construction of and commission the Pull Station by 1 October 2009, as agreed at the meeting held on 4 August 2009.	Exhibit R-52. Minutes of the meeting dated 4 August 2009. Exhibit C-100. Acceptance Act in respect of the Pull Station dated 30 July 2010.
24 December 2009	Manolium-Engineering sent a letter to Gosstroy asking to extend the permit for construction of the Depot until 31 December 2010 and referring to the " <i>difficulties in the financing of construction</i> ".	Exhibit C-264. Letter from Manolium-Engineering to Gosstroy of 24 December 2009.

Date	Event	Evidence
5 January 2010	Manolium-Engineering filed an application to extend the permit for construction of the Depot	Exhibit R-181. Application of Manolium-Engineering to Gosstroy dated 5 January 2010.
25 January 2010	Gosstroy extended the permit for construction of the Depot until 31 August 2010.	Exhibit C-265. Construction permit issued by Gosstroy for constructing the Depot of 25 January 2010.
25 March 2010	The final deadline for Manolium-Engineering to submit the general plan of the Investment Object.	Exhibit C-116. Investment Object Location Selection Act dated 25 March 2009.
April – May 2010	Manolium-Engineering referred in its letters to Gosstroy and MCEC to the financial difficulties it was experiencing, which were delaying the completion and commissioning of the Depot.	Exhibit R-54. Letter from Manolium-Engineering to Gosstroy dated 20 April 2010. Exhibit R-55. Letter from Manolium-Engineering to MCEC dated 26 May 2010.
17 May 2010	Manolium-Engineering requested the Committee for Architecture [the Architecture Committee] to provide documents necessary to prepare the Construction Documents [Design Specification and Estimate Documentation] relating to the Buildings to be Demolished.	Exhibit C-117. Letter from Manolium-Engineering to MCEC dated 17 May 2010.
6 July 2010	Manolium Engineering and Minsktrans entered into an agreement for the gratuitous use of the Pull Station.	Exhibit C-99. Pull Station Gratuitous Use Agreement dated 6 July 2010.
30 July 2010	A commission composed of, among others, representatives of Minsktrans and Manolium-Engineering accepted the Pull Station into operation (i.e. the Pull Station was commissioned).	Exhibit C-100. Acceptance Act in respect of the Pull Station dated 30 July 2010
6 September 2010	Manolium-Engineering requested MCEC to extend until 1 July 2011 the period of temporary use for the land plots on which the New Communal Facilities were being constructed.	Exhibit C-74. Letter from Manolium-Engineering to MCEC dated 6 September 2010.

Date	Event	Evidence
9 September 2010	Manolium-Engineering asked to transfer the ownership title of the Buildings to be Demolished to Manolium-Engineering, to provide Manolium-Engineering with a demolition permit and to provide the land plot for preparing the construction site for the Investment Object.	Exhibit C-118. Letter from Manolium-Engineering dated 9 September 2010.
16 September 2010	MCEC issued a decision to extend until 1 July 2011 the period for Manolium-Engineering's temporary use of the land plots on which the New Communal Facilities were being constructed.	Exhibit C-75. Decision of MCEC dated 16 September 2010; Exhibit C-267. Decision of Minsk City Executive Committee of 16 September 2010.
20 September 2010	MCEC provided notice that the Claimant and Manolium-Engineering were in breach of their obligations under the Amended Investment Contract.	Exhibit R-57. Letter from MCEC to Manolium-Engineering dated 20 September 2010.
1 October 2010	The Pull Station was registered as a real estate item.	Exhibit C-101. Registration of the Pull Station as a permanent structure dated 1 October 2010.
14 October 2010	MCEC provided notice of its intention to terminate the Amended Investment Contract three months from the date of the letter.	Exhibit R-59. Letter from MCEC to the Claimant and Manolium-Engineering dated 14 October 2010.
29 October 2010	Manolium-Engineering applied to extension of the permit for construction of the Depot until 1 July 2011.	Exhibit C-268. Letter from Manolium-Engineering to Gosstroy of 29 October 2010. Exhibit R-186. Application to extend the permit for construction of the Depot
8 November 2010	Minsktrans informed MCEC that the request to transfer the Pull Station to the communal [municipal] ownership should be considered in July 2011.	Exhibit C-327. Letter from Minsktrans to MCEC dated 8 November 2010

Date	Event	Evidence
17 November 2010	Minsktrans refused to accept the Pull Station into communal [municipal] ownership.	Exhibit C-104. Letter from Minsktrans to Manolium-Engineering dated 17 November 2010.
20 December 2010	Gosstroy extended permit for construction of the Depot until 31 December 2010	Exhibit C-269. Construction permit issued by Gosstroy for constructing the Depot of 20 December 2010.
19 January 2011	Manolium-Engineering applied to Gosstroy for extension of permit for construction of the Depot until 1 July 2011.	Exhibit C-270. Letter from Manolium-Engineering to Gosstroy of 19 January 2011.
27 January 2011	Gosstroy extended permit for construction of the Depot until 1 July 2011.	Exhibit C-271. Construction permit issued by Gosstroy for constructing the Depot of 27 January 2011.
25 March 2011	The final deadline for Manolium-Engineering to submit the Design Specification and Estimate Documentation for the Investment Object.	Exhibit C-116. Investment Object Location Selection Act dated 25 March 2009.
20 April 2011	Additional Agreement No. 6 to the Investment Contract was signed by the Claimant, Manolium-Engineering, MCEC and Minsktrans.	Exhibit C-76. Additional Agreement No. 6.
April 2011	Manolium-Engineering provided an updated schedule for the design and construction of the Investment Object upon MCEC's request.	Exhibit C-120. Schedule of Manolium-Engineering in respect of designing and constructing the Investment Object of April 2011.
26 April 2011	The Committee for Architecture [the Architecture Committee] notified Manolium-Engineering that it could not issue a construction plan for the Buildings to be Demolished, because Manolium-Engineering had not prepared and obtained an expert report on the architecture plan.	Exhibit C-121. Letter from the Committee for Architecture to Manolium-Engineering dated 26 April 2011.

Date	Event	Evidence
29 June 2011	Manolium-Engineering proposed dividing the administrative and accommodation block of the Depot into a separate start-up facility to be commissioned in July 2011. Manolium-Engineering also stated that it was ready to provide Minsktrans with the right to use the administrative and accommodation block of the Depot.	Exhibit C-77. Letter from Manolium-Engineering to MCEC dated 29 June 2011.
1 July 2011	The deadline for the design, construction and commissioning of the New Communal Facilities under Additional Agreement No. 6 passed and the permits to the land plots for the construction of the New Communal Facilities granted to Manolium-Engineering expired.	Exhibit C-75. Decision of MCEC dated 16 September 2010. Exhibit C-76. Additional Agreement No. 6.
1 July 2011	The Claimant made a decision to create the acceptance committee for putting the Road into operation (i.e. commissioning it).	Exhibit C-91. Order of Manolium-Engineering No. 1-C dated 1 July 2011.
4 July 2011	The Claimant and Manolium-Engineering sent a draft supplemental agreement to the Amended Investment Contract to MCEC.	Exhibit R-65. Draft Supplemental Agreement dated 4 July 2011.
6 July 2011	Minsktrans sent a letter to Manolium-Engineering listing the defects of the Pull Station.	Exhibit R-66. Letter from Minsktrans to Manolium-Engineering dated 6 July 2011
22 July 2011	Minsktrans refused to accept the transfer of ownership of the Pull Station for the second time.	Exhibit C-78. Letter from Minsktrans to Manolium-Engineering dated 22 July 2011.
1 September 2011	The last construction permit for the Road expired.	Exhibit R-36. Summary form, information about the Road.
1 September 2011	Manolium-Engineering issued an order establishing a commission for acceptance of the Road.	Exhibit C-317. Order of Manolium-Engineering No. 1-C of 1 September 2011.
5 September 2011	A working commission comprised of representatives of Manolium-Engineering, a contractor and designers accepted Checkpoint.	Exhibit C-314. Act of Acceptance of 5 September 2011

Date	Event	Evidence
19 September 2011	Minsktrans refused to accept the transfer of ownership of the Pull Station for the third time.	Exhibit C-105. Letter from Minsktrans to Manolium-Engineering dated 19 September 2011.
14 October 2011	A working commission comprised of representatives of Manolium-Engineering, a contractor and designers accepted the Administrative and Accommodation Building of the Depot.	Exhibit C-315. Act of Acceptance of 14 October 2011.
21 October 2011	Minsktrans requested that the Claimant and Manolium-Engineering pay a fine for missing the deadline for the construction and commissioning of the New Communal Facilities under the Amended Investment Contract.	Exhibit R-72. Letter from Minsktrans to the Claimant and Manolium-Engineering dated 21 October 2011.
21 October 2011	Manolium-Engineering asked the Belarusian SCC to accept the Pull Station into communal [municipal] ownership and informed it that Manolium-Engineering had previously applied to MCEC and Minsktrans with regard to this.	Exhibit C-108. Letter from Manolium-Engineering to the State Control Committee of the Republic of Belarus dated 21 October 2011.
27 October 2011	Minsktrans requested Manolium-Engineering to provide its post-completion (as-built) documentation for the Pull Station to accept the said facility into communal [municipal] ownership.	Exhibit C-81. Letter from Minsktrans to Manolium-Engineering dated 27 October 2011.
31 October 2011	Minsktrans notified Manolium-Engineering of its readiness to accept the Pull Station only subject to the replacement of electric machinery.	Exhibit C-109. Letter from Minsktrans to Manolium-Engineering dated 31 October 2011.
14 November 2011	Manolium-Engineering and Minsktrans entered into an agreement for the gratuitous use of the administrative and accommodation block and the checkpoint of the Depot.	Exhibit C-82. Agreement for gratuitous use of the administrative and accommodation block and the checkpoint.

Date	Event	Evidence
24 November 2011	Manolium-Engineering requested MCEC to provide the land plot for the construction of the Investment Object.	Exhibit C-122. Letter from Manolium-Engineering to MCEC dated 24 November 2011.
6 December 2011	Minsktrans informed Manolium-Engineering that under the Amended Investment Contract, before applying for the land plot for construction of the Investment Object, Manolium-Engineering should commission and transfer the New Communal Facilities into communal [municipal] ownership.	Exhibit C-123. Letter from Minsktrans to Manolium-Engineering dated 6 December 2011.
13 December 2011	Minsktrans requested Manolium-Engineering to provide calculations for the expenses incurred in connection with the construction of the Pull Station.	Exhibit C-92. Letter from Minsktrans to Manolium-Engineering dated 13 December 2011.
30 December 2011	The latest construction permit for the Depot expired.	Exhibit R-71. Construction permit for the Depot dated 3 October 2011.
9 January 2012	Manolium-Engineering informed Gosstroy that due to lack of funds, Manolium-Engineering had suspended the construction of the Depot until 1 April 2012.	Exhibit R-75. Letter from Manolium-Engineering to Gosstroy dated 9 January 2012.
18 January 2012	At a meeting between representatives of Minsktrans and Manolium-Engineering, the attendees decided to prepare a construction schedule of the Production Building of the Depot assuming the completion of works by 1 May 2012.	Exhibit C-320. Minutes of meeting between Minsktrans and Manolium-Engineering of 18 January 2012.
3 February 2012	Minsktrans requested that the Claimant and Manolium-Engineering pay a fine for missing the deadline for the construction and commissioning of the New Communal Facilities under the Amended Investment Contract.	Exhibit R-76. Letter from Minsktrans to the Claimant and Manolium-Engineering dated 3 February 2011.

Date	Event	Evidence
20 March 2012	MCEC received an amended draft supplemental agreement to the Amended Investment Contract from the Claimant and Manolium-Engineering.	Exhibit R-78. Draft Supplemental Agreement, undated, received by fax on 20 March 2012.
23 March 2012	The meeting of representatives of Manolium-Engineering and Minsktrans confirmed 1 July 2012 as a date of commissioning the Depot.	Exhibit C-322. Protocol of meeting between Minsktrans and Manolium-Engineering of 23 March 2012.
27 March 2012	Minsktrans requested that Manolium-Engineering “ <i>bring the exterior of the [Pull Station] [...] to the proper condition</i> ” in view of the preparation of the transfer of the Pull Station in the communal [municipal] ownership of the city.	Exhibit C-330. Letter from Minsktrans to Manolium-Engineering of 27 March 2012.
3 April 2012	A meeting was held between, among others, Manolium-Engineering, MCEC and Minsktrans, where MCEC proposed its own amended draft supplemental agreement to the Amended Investment Contract.	Exhibit R-79. Minutes of the meeting dated 3 April 2012.
6 April 2012	MCEC sent the draft supplemental agreement to the Amended Investment Contract which was discussed at the meeting of 3 April 2012 to the Claimant and Manolium-Engineering.	Exhibit R-80. Letter from MCEC to the Claimant and Manolium-Engineering dated 6 April 2012.
13 April 2012	Manolium-Engineering applied to Gosstroy seeking a construction permit for the Depot.	Exhibit R-81. Letter from Manolium-Engineering to Gosstroy dated 13 April 2012.
21 April 2012	Gosstroy did not issue a construction permit for the Depot because Manolium-Engineering had failed to provide the necessary supporting documents.	Exhibit C-127. Letter from Gosstroy to Manolium-Engineering dated 21 April 2012.
25 April 2012	Manolium-Engineering sent to Gosstroy another application seeking a construction permit for the Depot and attaching some of the supporting documents necessary for the construction permit.	Exhibit R-84. Letter from Manolium-Engineering to Gosstroy dated 25 April 2012.

Date	Event	Evidence
30 April 2012	Manolium-Engineering refused to sign the draft supplemental agreement to the Amended Investment Contract sent by MCEC on 6 April 2012.	Exhibit R-85. Letter from Manolium-Engineering to MCEC dated 30 April 2012.
7 May 2012	Manolium-Engineering wrote to the President of the Republic of Belarus stating that it intended to terminate all investment projects in Belarus.	Exhibit R-86. Letter from Manolium-Engineering to the President of the Republic of Belarus dated 7 May 2012.
22 May 2012	MCEC received Manolium-Engineering’s request to extend the statutory term for the construction of the Depot and the Road.	Exhibit R-87. Letter from Manolium-Engineering to MCEC dated 18 May 2012 (received on 22 May 2012).
5 June 2012	MCEC declined to extend the statutory term for the construction of the Depot and the Road because Manolium-Engineering had failed to provide the full set of the necessary supporting documents required by Belarusian law.	Exhibit R-90. Letter from MCEC to Manolium-Engineering dated 5 June 2012.
11 June 2012	Manolium-Engineering wrote to MCEC that Manolium-Engineering “was returning” the land plots where the New Communal Facilities were located in light of non-extension of the Investment Contract.	Exhibit C-336. Letter from Manolium-Engineering to Minsk City Executive Committee of 11 June 2012
18 June 2012	MCEC requested that the Director of the Claimant organise the signing of MCEC’s draft supplemental agreement to the Amended Investment Contract of 6 April 2012 and for financing of the construction of the New Communal Facilities to be resumed.	Exhibit C-126. Letter from MCEC to the Claimant dated 18 June 2012. Exhibit R-89. Attachment to letter from MCEC to the Claimant dated 18 June 2012.
June 2012	MCEC received a letter from the Claimant in which the Claimant proposed to finance the construction of the New Communal Facilities in exchange for the transfer of ownership of the land plot for the implementation of the Investment Object.	Exhibit-R-88. Claimant’s undated letter to MCEC w/date (in response to MCEC’s letter dated 18 June 2012)

Date	Event	Evidence
17 July 2012	Land Planning Service of MCEC informed Manolium-Engineering that it was impossible to return the land plots because the uncompleted New Communal Facilities were located on them and that the issue with the land plots could be resolved together with termination of the Amended Investment Agreement.	Exhibit C-337. Letter from Minsk Land Planning Service to Manolium-Engineering of 17 July 2012.
23 July 2012	The judge of the Pervomaysky District Court resolved that the administrative proceedings against Manolium-Engineering with regard to unauthorized occupation of the land plot where the New Communal Facilities were located shall be terminated because of absence of set of all elements of an administrative offence.	Exhibit C-346. Resolution of Pervomayskiy district court of Minsk of 23 July 2012.
26 July 2012	MCEC did not agree to the Claimant's proposal regarding the transfer of ownership of the land plot for the implementation of the Investment Object.	Exhibit R-92. Letter from MCEC to the Claimant dated 26 July 2012.
26 July 2012	MCEC proposed holding a meeting in Minsk to discuss the future of the project.	Exhibit R-96. Letter from MCEC to the Claimant and Manolium-Engineering dated 28 September 2012.
2 August 2012	MCEC held a meeting with the representatives of Minsktrans and Manolium-Engineering, at which the participants agreed that Minsktrans would prepare a calculation of the costs incurred by Manolium-Engineering in constructing the New Communal Facilities.	Exhibit R-93. Minutes of the meeting attended by MCEC, Minsktrans and Manolium-Engineering dated 2 August 2012.
9 August 2012	It was decided that Minsktrans, RUP Republic Science and Technology Center for Pricing in the Construction Section and Manolium-Engineering shall estimate the costs incurred by Manolium-Engineering for implementation of the investment project.	Exhibit C-324. Minutes of the meeting attended by Minsk City Executive Committee, Minsktrans and Manolium-Engineering of 9 August 2012.

Date	Event	Evidence
22 August 2012	The pavement roughness and flatness of the Road were tested and found satisfying the necessary characteristics.	Exhibit C-318. Test protocol of State Enterprise Department of road-bridges construction and municipal improvement of the Minsk City Executive Committee on pavement of the Road of 22 August 2012.
28 August 2012	Minsktrans informed Manolium-Engineering that, according to the data provided, the total cost incurred for the works performed and the equipment purchased in constructing the New Communal Facilities was US\$13,521,464.	Exhibit C-128. Letter from Minsktrans to Manolium-Engineering dated 28 August 2012.
11 September 2012	Manolium-Engineering responded to Minsktrans' letter dated 28 August 2012, providing an alternative calculation of US\$16,287,546.	Exhibit R-94. Letter from Manolium-Engineering to Minsktrans dated 11 September 2012
14 September 2012	Minsktrans sent a letter to MCEC, stating that part but not all of the costs listed in Manolium-Engineering's letter dated 11 September 2012 could be included in the calculation.	Exhibit R-95. Letter from Minsktrans to MCEC dated 14 September 2012.
14 September 2012	Minsktrans sent a letter to Manolium-Engineering with the calculation of the total amount of costs for construction of the New Communal Facilities at US\$14,743,586.	Exhibit C-326. Letter from Minsktrans to Manolium-Engineering of 14 September 2012.
20 September 2012	Manolium-Engineering proposed to constitute a committee of the representatives of MCEC and Manolium-Engineering together with an independent audit company to assess the costs incurred in constructing the New Communal Facilities.	Exhibit C-129. Letter from Manolium-Engineering to MCEC dated 20 September 2012.

Date	Event	Evidence
28 September 2012	MCEC requested a meeting with the representatives of the Claimant and Manolium-Engineering in Minsk to discuss the future of the project.	Exhibit R-96. Letter from MCEC to the Claimant and Manolium-Engineering dated 28 September 2012.
3 October 2012	MCEC proposed that Minsktrans should take part in the audit review proposed by Manolium-Engineering on 20 September 2012.	Exhibit C-130. Letter from MCEC to Manolium-Engineering dated 3 October 2012.
5 November 2012	Audit firm Paritet-Standart issued the Paritet-Standart Report.	Exhibit C-131. Paritet-Standart Report.
8 November 2012	Manolium-Engineering sent a letter to MCEC stating that according to the audit review conducted by Paritet-Standart, as at 1 October 2012, the amount of costs incurred by Manolium-Engineering was US\$18,313,814.90.	Exhibit R-197. Letter from Manolium-Engineering to MCEC dated 8 November 2012.
20 November 2012	Manolium-Engineering sent a letter to MCEC stating that according to the audit review conducted by Paritet-Standart, as at 31 December 2012, the amount of costs incurred by Manolium-Engineering was US\$17,356,122.85.	Exhibit R-198. Letter from Manolium-Engineering to MCEC dated 20 November 2012.
5 December 2012	MCEC proposed to terminate the Amended Investment Contract and enter into a New Investment Contract for the construction of the Investment Object.	Exhibit R-97. Minutes of the meeting attended by MCEC and Manolium-Engineering dated 5 December 2012.

Date	Event	Evidence
10 December 2012	MCEC sent the Claimant and Manolium-Engineering a draft Agreement on Termination of the Amended Investment Contract and a draft New Investment Contract.	<p>Exhibit C-132. Letter from MCEC to Manolium-Engineering dated 10 December 2012;</p> <p>Exhibit R-98. Draft investment contract for the implementation of the Investment Object enclosed with MCEC's letter to Manolium-Engineering dated 10 December 2012.</p>
18 December 2012	Manolium-Engineering sent MCEC amended drafts of the Agreement on Termination of the Amended Investment Contract and the New Investment Contract.	<p>Exhibit C-133. Letter from Manolium-Engineering to MCEC dated 18 December 2012; Exhibit R-100. Attachments to letter from Manolium-Engineering to MCEC dated 18 December 2018.</p>
18 January 2013	MCEC provided comments on Manolium-Engineering's drafts of the Agreement on Termination of the Amended Investment Contract and New Investment Contract.	<p>Exhibit C-134. Letter from MCEC to Manolium-Engineering dated 18 January 2013.</p>
31 January 2013	The Claimant sent MCEC amended drafts of the Agreement on Termination of the Amended Investment Contract and New Investment Contract.	<p>Exhibit R-104. Letter from the Claimant to MCEC dated 31 January 2013.</p>
4 February 2013	MCEC reiterated the comments set out in its letter of 18 January 2013 regarding the Claimant's drafts of the Agreement on Termination of the Amended Investment Contract and New Investment Contract.	<p>Exhibit C-135. Letter from MCEC to the Claimant dated 4 February 2013.</p>

Date	Event	Evidence
4 March 2013	The Claimant made two proposals regarding the completion of the New Communal Facilities and their transfer into communal [municipal] ownership as alternatives to signing an Agreement on Termination of the Amended Investment Contract and a New Investment Contract.	Exhibit C-136. Letter from the Claimant to MCEC dated 4 March 2013.
11 March 2013	MCEC did not agree to the alternative options suggested by the Claimant and requested Manolium-Engineering to address its comments on the draft New Investment Contract.	Exhibit C-137. Letter from MCEC to Manolium-Engineering dated 11 March 2013.
14 March 2013	MCEC recognised the Investment Object Location Selection Act [Investment Object Location Act] to be invalid.	Exhibit C-138. Decision of MCEC dated 14 March 2013.
15 March 2013	Ms ██████████, the chief accountant of Manolium-Engineering, prepared an internal memorandum explaining that Manolium-Engineering was under an obligation to account for and pay land tax and property tax for the year 2013.	Exhibit R-7. Internal Memorandum of Ms ██████████ to Mr Dolgov dated 15 March 2013.
19 March 2013	The Claimant proposed that MCEC should: <ul style="list-style-type: none"> a. accept the incomplete New Communal Facilities into communal [municipal] ownership; b. transfer US\$30 million to the Claimant to compensate its estimated costs; and c. provide Manolium-Engineering the right to use the land for the Investment Object at its discretion and for its own purposes. 	Exhibit C-83. Letter from the Claimant to MCEC dated 19 March 2013.
26 March 2013	Minsktrans requested Manolium-Engineering to prepare documents for preparation of a draft resolution of the MCEC on gratuitous transfer of the New Communal Facilities to the communal [municipal] ownership.	Exhibit C-338. Letter from Minsktrans to Manolium-Engineering of 26 March 2013.

Date	Event	Evidence
28 March 2013	MCEC did not agree to the Claimant's proposal in its letter of 19 March 2013 and notified the Claimant of its intent to terminate the Amended Investment Contract.	Exhibit R-105, Exhibit C-339. Letter from MCEC to Manolium-Engineering and the Claimant dated 28 March 2013.
3 April 2013	Manolium-Engineering sent a draft supplemental agreement to the Amended Investment Contract to MCEC.	Exhibit R-106. Letter from Manolium-Engineering to MCEC dated 3 April 2013.
9 April 2013	MCEC provided comments on the Claimant's draft supplemental agreement to the Amended Investment Contract sent on 3 April 2013.	Exhibit R-107. Letter from MCEC to Manolium-Engineering dated 9 April 2013.
27 May 2013	The Claimant proposed to transfer the incomplete New Communal Facilities into communal [municipal] ownership.	Exhibit C-93. Letter from the Claimant to MCEC dated 27 May 2013
7 June 2013	MCEC asked the Claimant to confirm that its proposal was to transfer the incomplete New Communal Facilities into communal [municipal] ownership free-of-charge.	Exhibit R-108. Letter from MCEC to the Claimant dated 7 June 2013.
12 June 2013	The Claimant's shareholders issue a decision to transfer the New Communal Facilities to the communal [municipal] ownership.	Exhibit C-342. Claimant's decision of 12 June 2013.
27 June 2013	The Claimant confirmed that its proposal was to transfer the incomplete New Communal Facilities into communal [municipal] ownership in exchange for the right to develop the land plot for the Investment Object.	Exhibit C-94. Letter from the Claimant to MCEC dated 27 June 2013.
19 September 2013	MCEC informed the Claimant that it had prepared a claim to terminate the Amended Investment Contract for submission to the Economic Court of Minsk.	Exhibit C-139. Letter from MCEC to the Claimant dated 19 September 2013.
28 October 2013	Manolium-Engineering requested the MCEC to accept into operation the Pull Station and to transfer it into the communal [municipal] ownership.	Exhibit C-319. Letter from Manolium-Engineering to Minsk City Executive Committee of 28 October 2013.

Date	Event	Evidence
12 November 2013	MCEC and Minsktrans filed a statement of claim to terminate the Amended Investment Contract to the Economic court of Minsk.	Exhibit C-140. Statement of claim to terminate the Amended Investment Contract. Exhibit R-201. Statement of claim to terminate the Amended Investment Contract with court stamp.
20 February 2014	Ms [REDACTED], the chief accountant of Manolium-Engineering, prepared an internal memorandum explaining that Manolium-Engineering was under an obligation to account for and pay land tax and property tax for the year 2014.	Exhibit R-202. Internal Memorandum of Ms [REDACTED] to Mr Dolgov dated 20 February 2014.
20 February 2014	Manolium-Engineering requested the MCEC to have a meeting to discuss potential ways for settlement of the situation resulted from filing statement of claim by MCEC.	Exhibit C-316. Letter from Manolium-Engineering to Minsk City Executive Committee of 20 February 2014.
21 February 2014	The District Tax Inspectorate demanded that Manolium-Engineering comply with its obligations to submit land tax returns for the years 2013 and 2014.	Exhibits R-111 and R-112. Demands of the District Tax Inspectorate dated 21 February 2014.
18 June 2014	The Claimant proposed transferring the incomplete New Communal Facilities into the communal [municipal] ownership of Minsk and transferring US\$3 million to Minsktrans for their completion, in exchange for MCEC changing the planning permission for the Investment Object and granting Manolium-Engineering the right to construct a luxury accommodation and shopping centre.	Exhibit C-141. Letter from the Claimant to MCEC dated 18 July 2014.
15 August 2014	MCEC transferred certain buildings located on the land plot intended for the Investment Object to GPO Minskstoy.	Exhibit C-142. Decision of MCEC dated 15 August 2014.

Date	Event	Evidence
21 August 2014	The Economic Court of Minsk sent a letter to the Claimant, Manolium-Engineering, MCEC and Minsktrans communicating the list of documents requested by the Registration and Cadastre Agency and necessary to conduct the court-appointed expert examination.	Exhibit R-204. Letter from the Economic Court of Minsk to the Claimant, Manolium-Engineering, MCEC and Minsktrans dated 21 August 2014.
9 September 2014	The judge of the Economic Court of Minsk rendered a decision to terminate the Amended Investment Contract.	Exhibit C-147. Judgment of the Economic Court of Minsk dated 9 September 2014.
9 October 2014	Manolium-Engineering filed an appeal against the decision of the Economic Court of Minsk to terminate the Amended Investment Contract.	Exhibit C-149. Statement of appeal of Manolium- Engineering.
29 October 2014	The Appeal Instance of the Economic Court of Minsk upheld the decision of the Economic Court of Minsk to terminate the Amended Investment Contract. The termination of the Amended Investment Contract became legally effective.	Exhibit C-150. Ruling of the Appeal Instance of the Economic Court of Minsk dated 29 October 2014.
24 November 2014	Manolium-Engineering filed a cassation appeal to the Supreme Court of Belarus in respect of the decisions of the Economic Court of Minsk and the Appeal Instance of the Economic Court of Minsk terminating the Amended Investment Contract.	Exhibit C-151. Cassation appeal of Manolium-Engineering.
30 December 2014	Manolium-Engineering and Minsktrans agreed to terminate the agreement for the gratuitous use of the administrative and accommodation block and the checkpoint of the Depot.	Exhibit C-84. Agreement on terminating the Depot Facilities Gratuitous Use Agreement dated 30 December 2014.
1 January 2015	The Treaty on the Eurasian Economic Union entered into force.	Exhibit CL-3. Protocol No. 16 to EEU Treaty. Exhibit C-1. Official website of the Eurasian Economic Commission, The Treaty on the Eurasian Economic Union entered into force

Date	Event	Evidence
8 January 2015	The Claimant sent two identical letters to MCEC and the Administration of the President of Belarus, proposing to transfer the Pull Station and the Road into communal [municipal] ownership in their current state without charge, and, in exchange, for the Claimant to be provided with the right to adapt the Depot into a hardware trading facility for its own use.	Exhibit R-119. Letter from the Claimant to MCEC dated 8 January 2015; Exhibit R-120. Letter from the Claimant to the Administration of the President of Belarus dated 8 January 2015.
20 January 2015	MCEC did not agree to the Claimant's proposal to adapt the Depot into a hardware trading facility. MCEC also objected to the calculation of costs in the Paritet-Standart Report.	Exhibit R-121. Letter from MCEC to the Claimant dated 20 January 2015.
27 January 2015	The Supreme Court of the Republic of Belarus dismissed Manolium-Engineering's cassation appeal and upheld the judgments of the lower courts on termination of the Amended Investment Contract.	Exhibit C-152. Decision of the Supreme Court of the Republic of Belarus dated 27 January 2015.
4 February 2015	MCEC, Minsktrans and the Claimant decided that the Registration and Cadastre Agency should assess the costs incurred by the Claimant in the construction of the New Communal Facilities.	Exhibit C-153. Minutes of the meeting attended by MCEC, Minsktrans and the Claimant dated 4 February 2015.
24 February 2015	Manolium-Engineering asked the Registration and Cadastre Agency to assess the costs incurred by the Claimant during the construction of the New Communal Facilities, including all associated expenses.	Exhibit R-122. Letter from Manolium-Engineering to the Registration and Cadastre Agency dated 24 February 2015.
26 February 2015	Manolium-Engineering and the Registration and Cadastre Agency entered into a services agreement to conduct a construction and technical audit of the New Communal Facilities.	Exhibit R-123. Services agreement between Manolium-Engineering and the Registration and Cadastre Agency dated 26 February 2015.
16 June 2015	The Registration and Cadastre Agency stated in its report that the amount of costs incurred by the Claimant in the course of constructing the New Communal Facilities (including associated expenses) was equivalent to US\$18,129,933.17.	Exhibit C-154. Registration and Cadastre Agency Report dated 16 June 2015, page 2.

Date	Event	Evidence
17 June 2015	Manolium-Engineering notified MCEC of the results of the Registration and Cadastre Agency's assessment of the Claimant's costs.	Exhibit C-155. Letter from Manolium-Engineering to MCEC dated 17 June 2015.
26 June 2015	The Registration and Cadastre Agency confirmed the approach it had taken in assessing the costs incurred by the Claimant in connection with the construction of the New Communal Facilities and the scope of the assessment.	Exhibit R-124. Letter from the Registration and Cadastre Agency to MCEC dated 26 June 2015.
30 June 2015	Manolium-Engineering sent a letter to the President of the Republic of Belarus regarding the assessment of costs incurred by the Claimant.	Exhibit R-125. Letter from Manolium-Engineering to the President of the Republic of Belarus dated 30 June 2015.
9 July 2015	The State Property Committee of Belarus informed MCEC that the Registration and Cadastre Agency's valuation was not independent according to the requirements of the Presidential Decree "On valuation activities in the Republic of Belarus" and that the Registration and Cadastre Agency had acted on the basis of the instructions of Manolium-Engineering.	Exhibit R-126. Letter from the State Property Committee of Belarus to MCEC dated 9 July 2015.
7 August 2015	MCEC informed Manolium-Engineering that its costs could not be compensated on the basis of the Registration and Cadastre Agency Report and that this issue should be resolved by the court.	Exhibit C-156. Letter from MCEC to Manolium-Engineering dated 7 August 2015.
20 August 2015	Manolium-Engineering stated that, at the meeting of 4 February 2015, MCEC had proposed that the Claimant's actual costs in the construction of the New Communal Facilities should be assessed, and asked MCEC to provide a calculation of its actual costs within 10 days.	Exhibit C-157. Letter from Manolium-Engineering to MCEC dated 20 August 2015.

Date	Event	Evidence
4 September 2015	MCEC informed Manolium-Engineering that the conditions upon which it had agreed to consider the possibility of compensating the Claimant's expenses at the meeting of 4 February 2015 had not been met.	Exhibit C-158. Letter from MCEC to Manolium-Engineering dated 4 September 2015.
12 November 2015	Manolium-Engineering requested an in-person meeting with the President of the Republic of Belarus.	Exhibit R-127. Letter from Manolium-Engineering to the President of the Republic of Belarus dated 12 November 2015.
23 November 2015	The Prime-Minister of Belarus instructed MCEC, the Ministry of Economy and the Ministry of Justice to consider whether it was necessary to arrange an in-person meeting between the President and Manolium-Engineering.	Exhibit R-128. The Prime-Minister's Instruction to MCEC, the Ministry of Economy and the Ministry of Justice dated 23 November 2015.
26 November 2015	MCEC informed the Ministry of Economy that it was having internal discussions with the Belarusian authorities regarding the potential acquisition of the New Communal Facilities and that any meeting with Manolium-Engineering was premature until the terms and conditions of the acquisition had been determined and agreed by the relevant competent authorities.	Exhibit R-129. Letter from MCEC to the Ministry of Economy dated 26 November 2015.
27 November 2015	The Ministry of Economy informed Manolium-Engineering and the Council of Ministers about the current internal discussions taking place with the Belarusian authorities regarding the potential acquisition of the New Communal Facilities.	Exhibit R-130. Letter from the Ministry of Economy to Manolium-Engineering dated 27 November 2015; Exhibit R-131. Letter from the Ministry of Economy to the Council of Ministers dated 27 November 2015.

Date	Event	Evidence
2 December 2015	MCEC sent a letter to the Ministry of Architecture and Construction and the State Property Committee asking it to propose, among other things, a method of assessing the value of the New Communal Facilities, a body to conduct the assessment and the method and source of financing the assessment.	Exhibit R-132. Letter from MCEC to the Ministry of Architecture and Construction and the State Property Committee dated 2 December 2015.
8 December 2015	MCEC asked the Council of Ministers to instruct the CAO of the Ministry of Finance and, where necessary, specialists from other competent authorities, to conduct additional checks on the New Communal Facilities and reassess the costs incurred in the construction.	Exhibit R-133. Letter from MCEC to the Council of Ministers of the Republic of Belarus dated 8 December 2015.
28 December 2015	The Ministry of Finance informed MCEC that the proposed reassessment of the costs incurred in constructing the New Communal Facilities did not fall within the scope of its tasks or functions.	Exhibit R-134. Letter from the Ministry of Finance to MCEC dated 28 December 2015.
30 December 2015	MCEC held a meeting concerning the reassessment of the costs incurred in constructing the New Communal Facilities with representatives of the Belarusian authorities and various government ministries. The meeting participants resolved to ask the Council of Ministers to direct that the reassessment be conducted by the CAO of the Ministry of Finance together with the RSDC [RSTC].	Exhibit R-136. Minutes of the meeting between MCEC and representatives of the Belarusian authorities and ministries of 30 December 2015.
30 December 2015	MCEC updated the Council of Ministers on the outcome of the meeting of 30 December 2015, sought approval from the Council of Ministers of the proposed reassessment and asked the Council of Ministers to instruct the Ministry of Finance and the Ministry of Architecture and Construction to conduct additional checks on the New Communal Facilities and reassess the costs incurred in the construction.	Exhibit R-135. Letter from MCEC to the Council of Ministers dated 30 December 2015.

Date	Event	Evidence
27 January 2016	The Council of Ministers instructed the Ministry of Finance and the Ministry of Architecture and Construction to conduct an unscheduled audit of Manolium-Engineering, which was to include, in particular, a check measurement of the New Communal Facilities and a determination of the amount of costs spent on the New Communal Facilities based on the check measurement and other assessment measures.	Exhibit R-137. Instruction of the Council of Ministers dated 27 January 2016.
2 February 2016	The Ministry of Architecture and Construction proposed that the Ministry of Finance involve the employees of RSDC [RSTC] in the unscheduled audit of Manolium-Engineering.	Exhibit R-138. Letter from the Ministry of Architecture and Construction to the Ministry of Finance dated 2 February 2016.
3 February 2016	The Ministry of Finance of Belarus instructed the CAO of the Ministry of Finance and the RSDC [RSTC] to perform an unscheduled audit of certain issues relating to the financial and business operations of Manolium-Engineering for the period 5 April 2004 to 25 January 2016.	Exhibit C-159. Instruction of the Ministry of Finance dated 3 February 2016. Exhibit R-139. Instruction of the Ministry of Finance dated 3 February 2016.
22 February 2016	The CAO of the Ministry of Finance and RSDC [RSTC] issued the CAO of the Ministry of Finance Report [2016 Memorandum].	Exhibit C-160. CAO of the Ministry of Finance Report.
29 February 2016	MCEC informed the Council of Ministers that, at a meeting of 29 February 2016, representatives of MCEC, the Ministry of Economy, the Ministry of Architecture and Construction, the Ministry of Finance and the State Property Committee had agreed that the CAO of the Ministry of Finance Report [2016 Memorandum] could not be relied on as a basis for compensation of the amount calculated therein.	Exhibit R-140. Letter from MCEC to the Council of Ministers dated 29 February 2016.

Date	Event	Evidence
18 March 2016	The administrative protocols were drafted in relation to the alleged unauthorized occupation of the land plots where the New Communal Facilities are located by Manolium-Engineering, and the administrative proceedings were initiated.	<p>Exhibit C-343. Protocol of Minsk Land Planning Service of Minsk City Executive Committee on administrative offence No. 17 of 18 March 2016.</p> <p>Exhibit C-344. Protocol of Minsk Land Planning Service of Minsk City Executive Committee on administrative offence No. 20 of 18 March 2016.</p> <p>Exhibit C-345. Protocol of Minsk Land Planning Service of Minsk City Executive Committee on administrative offence No. 21 of 18 March 2016.</p>
March 2016	The Land Planning Service applied to the District Court to impose administrative sanctions on Manolium-Engineering for occupying the land plots without the requisite permits.	Exhibit C-162. Resolution of the Minsk City Court dated 13 May 2016.
5 April 2016	The District Court issued a decision terminating the administrative proceedings against Manolium-Engineering due to the lack of an intention to commit an administrative offence.	Exhibit C-162. Resolution of the Minsk City Court dated 13 May 2016.
April 2016	The Land Planning Service appealed against the decision of the District Court to the Minsk City Court terminating the administrative proceedings against Manolium-Engineering.	Exhibit C-162. Resolution of the Minsk City Court dated 13 May 2016.
21 April 2016	The Claimant requested MCEC to consider accepting the New Communal Facilities into communal [municipal] ownership.	Exhibit C-161. Letter from Manolium-Engineering to MCEC dated 21 April 2016.

Date	Event	Evidence
13 May 2016	The Minsk City Court annulled the District Court's decision of 5 April 2016 to terminate the administrative proceedings against Manolium-Engineering and sent the case back to the District Court for reconsideration by a different judge.	Exhibit C-162. Resolution of the Minsk City Court dated 13 May 2016.
17 May 2016	The District Court of Minsk imposed administrative sanctions on Manolium-Engineering for occupying the land plots without permits.	Exhibit C-182. Resolution of the court of the Pervomaysky District Court of Minsk dated 17 May 2016 (operative part and statement of reasons).
17 May 2016	The Tax Inspectorate [District Tax Inspectorate] conducted a desk tax audit of Manolium-Engineering's activities for the years 2013 to 2015 and the first half of 2016 and issued the First Tax Audit Report.	Exhibit C-164. First Tax Audit Report dated 17 May 2016. Exhibit R-141. Letter of the District Tax Inspectorate to Manolium-Engineering dated 18 May 2016. Exhibit R-142. Letter of the District Tax Inspectorate to the Claimant dated 18 May 2016.
10 June 2016	The Land Planning Service notified the tax authorities that Manolium-Engineering owned the Depot (which was under construction) and that the statutory term for its construction had expired.	Exhibit C-166. Amendments and supplements to the First Tax Audit Report dated 21 June 2016.
16 June 2016	The Land Planning Service notified the tax authorities that Manolium-Engineering occupied the land plots after the expiry of the requisite permits.	Exhibit C-166. Amendments and supplements to the First Tax Audit Report dated 21 June 2016.

Date	Event	Evidence
21 June 2016	The Tax Inspectorate [District Tax Inspectorate] amended the First Tax Audit Report and delivered the document setting out its amendments and supplements to the First Tax Audit Report to Manolium-Engineering.	Exhibit C-165. Letter from the District Tax Inspectorate to Manolium-Engineering dated 21 June 2016. Exhibit C-166. Amendments and supplements to the First Tax Audit Report dated 21 June 2016. Exhibit R-143. Letters from the District Tax Inspectorate to Mr Dolgov and Manolium-Engineering dated 21 June 2016.
5 July 2016	The Tax Inspectorate [District Tax Inspectorate] issued an order for the attachment of the New Communal Facilities. The order estimated the value of the attached property at 20,699,817.70 denominated Belarusian rubles (equivalent to approximately US\$ 10,360,787.68).	Exhibit C-167. Order of the District Tax Inspectorate to attach property dated 5 July 2016.
19 July 2016	The Tax Inspectorate [District Tax Inspectorate] issued and delivered to Manolium-Engineering a decision to recover the amounts due from Manolium-Engineering as set out in the amended First Tax Audit Report.	Exhibit C-168. Decision of the District Tax Inspectorate dated 19 July 2016. Exhibit R-144. Letters of the District Tax Inspectorate to Mr Dolgov dated 19 July 2016.
20 July 2016	The Tax Inspectorate [District Tax Inspectorate] applied to the Economic Court of Minsk for an order to enforce the land tax liabilities against the attached assets of Manolium-Engineering.	Exhibit C-169. Application of the District Tax Inspectorate dated 20 July 2016.
18 August 2016	The Economic Court of Minsk granted the order to enforce the land tax liabilities against the attached assets of Manolium-Engineering.	Exhibit C-170. Judgment of the Economic Court of Minsk dated 18 August 2016.

Date	Event	Evidence
6 September 2016	Representative of Manolium-Engineering familiarised himself with the court file, containing the order to enforce the land tax liabilities against the attached assets of Manolium-Engineering.	Exhibit R-209. Power of Attorney dated 9 August 2016. Exhibit R-210. Application to familiarise with case file dated 5 September 2016.
19 September 2016	Manolium-Engineering requested the MCEC to take necessary steps to enforce judgment of the Economic Court of Minsk to terminate the Investment Contract and withdraw the land plots where the New Communal Facilities are located.	Exhibit C-340. Letter from Manolium-Engineering to Minsk City Executive Committee of 19 September 2016.
29 September 2016	The Land Planning Service of MCEC responded to Manolium-Engineering that (1) the question concerning the return of the land plots was not the subject matter of the proceedings and had not been addressed by the judgment of the Economic Court of Minsk; and (2) Manolium-Engineering had not provided proof that the obstacles for the return of the land plots had been eliminated.	Exhibit C-341. Letter from Minsk City Executive Committee to Manolium-Engineering of 29 September 2016.
12 October 2016	Manolium-Engineering initiated voluntary liquidation proceedings.	Exhibit C-8. Letter from the Executive Committee of Minsk Region to the liquidator of Manolium-Engineering dated 14 October 2016.
17 November 2016	A meeting at the Department of Humanitarian Activities of the Administrative Office of the President of the Republic of Belarus took place. The meeting concerned, among other things, the inventory and expert evaluation of the market value of the New Communal Facilities.	Exhibit C-172. Letter from the Department of Humanitarian Activities of the Administrative Office of the President of the Republic of Belarus dated 18 November 2016.

Date	Event	Evidence
24 November 2016	The Tax Inspectorate [District Tax Inspectorate] resolved to impose an administrative fine on Manolium-Engineering for the failure to submit tax returns on time and to settle outstanding tax liabilities.	Exhibit R-146. Resolution of the District Tax Inspectorate imposing administrative sanctions on Manolium-Engineering dated 24 November 2016.
25 November 2016	A statement of inventory and evaluation of the New Communal Facilities was prepared.	Exhibit R-147. Statement of inventory and evaluation dated 25 November 2016.
1 December 2016	MCEC issued a decision to withdraw the land plots underlying the New Communal Facilities from Manolium- Engineering.	Exhibit C-173. Decision of MCEC dated 1 December 2016.
20 January 2017	The President of Belarus issued a decision to transfer the attached assets (i.e. the New Communal Facilities) into the communal [municipal] ownership of Minsk to enforce against Manolium-Engineering's tax liabilities.	Exhibits R-242. The order of the President of Belarus to transfer the New Communal Facilities into municipal ownership dated 20 January 2017.
27 January 2017	The New Communal Facilities were transferred into communal [municipal] ownership of Minsk, which was formalised by the Deed of Transfer dated 27 January 2017.	Exhibit C-186. Amendments to the Second Tax Audit Report dated 18 May 2017. Exhibit R-148. Deed of transfer dated 27 January 2017.
1 February 2017	A copy of the Deed of Transfer dated 27 January 2017 was handed to a representative of Manolium-Engineering during a court hearing of the Economic Court of Minsk.	Exhibit R-211. Minutes of the court hearing in relation to the case No. 40-5/B/2017 dated 1 - 8 February 2017. Exhibit R-149. Objections of the insolvency administrator to the Second Tax Audit Report.

Date	Event	Evidence
8 February 2017	The Economic Court of Minsk ordered the commencement of insolvency proceedings in respect of Manolium-Engineering and appointed an insolvency administrator.	Exhibit C-179. Information from the website of the courts of general jurisdiction. Exhibit R-149. Objections of the insolvency administrator to the Second Tax Audit Report dated 21 April 2017.
24 March 2017	The Region Tax Inspectorate issued the Second Tax Audit Report following a tax audit of Manolium-Engineering that took place in March 2017.	Exhibit C-187. Second Tax Audit Report dated 24 March 2017.
21 April 2017	The insolvency administrator of Manolium-Engineering filed objections to the Second Tax Audit Report.	Exhibit R-149. Objections of the insolvency administrator to the Second Tax Audit Report dated 21 April 2017.
25 April 2017	The Claimant sent the Pre-Arbitration Notice to the Respondent.	Exhibit C-190. Pre- Arbitration Notice of the Claimant dated 25 April 2017.
18 May 2017	The Region Tax Inspectorate introduced amendments to the Second Tax Audit Report to take account of the objections of Manolium-Engineering’s insolvency administrator.	Exhibit C-186. Amendments to the Second Tax Audit Report dated 18 May 2017
13 June 2017	The Region Tax Inspectorate issued a decision to recover from Manolium-Engineering the amounts due pursuant to the amended Second Tax Audit Report.	Exhibit C-188. Decision of the Region Tax Inspectorate dated 13 June 2017.
12 September 2017	OOO Astomaks won at public auction the right to design and construct on the land plot for the Investment Object.	Exhibit R-152. Announcement of the auction in relation to the right for design and construction on the Investment Object land plot. Exhibit R-153. Minutes of the results of the auction dated 12 September 2017.

Date	Event	Evidence
24 October 2017	The Respondent sent its response to the Pre-Arbitration Notice to the Claimant.	Exhibit C-191. Letter from the Ministry of Economy of the Republic of Belarus to the Claimant dated 24 October 2017.
27 October 2017 – 14 November 2017	The Parties corresponded regarding the possibility of holding a meeting.	Exhibit C-192. Letter from the Claimant to the Ministry of Economy of the Republic of Belarus dated 27 October 2017. Exhibit C-193. Letter from the Ministry of Economy of the Republic of Belarus to the Claimant dated 30 October 2017. Exhibit C-194. Letter from the Claimant to the Ministry of Economy of the Republic of Belarus dated 1 November 2017. Exhibit C-195. Letter from the Ministry of Economy of the Republic of Belarus to the Claimant dated 14 November 2017.
15 November 2017	The Claimant sent the Notice of Arbitration to the Respondent.	CS-I.