

APPROVED
by the Resolution of the Board of Directors
of Gazprom Neft PJSC
December 6, 2021
(Protocol dated 06.12.2021,
No. PT-0102)

**Gazprom Neft PJSC REGULATION
On Inside Information,
restated**

I. General Provisions

1.1. This Regulation on Inside Information (hereinafter – “the Regulation”) has been drafted pursuant to Federal Law No. 224-FZ “On Efforts to Counter the Illegal Use of Inside Information and Market Manipulation and on Amendments to Certain Legislative Acts of the Russian Federation”, dated 27 July 2010 (hereinafter – “the Law”), and other federal laws and regulations of the Russian Federation to ensure compliance with the requirements of the Law, and with Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse (“the Market Abuse Regulation”) to protect the legal rights and interests of shareholders and persons dealing with Gazprom Neft PJSC (hereinafter - “the Company”) in securities transactions, and to ensure the economic security of the Company.

1.2. This Regulation is intended to prevent, expose, and prohibit the illegal use of Inside Information pertaining to the Company, and (or) the manipulation of securities markets in respect of the Company’s securities based on such Inside Information, and includes:

- procedures for accessing such Inside Information, regulations governing the protection of the confidentiality of such Inside Information, and compliance with the requirements of the Law, and any regulation adopted pursuant to this;
- any procedure for notifying individuals of their inclusion in any Insider List or their exclusion from any such list;
- any procedure regarding the disclosure of Inside Information;
- any procedure governing the maintenance of any Insider List; and
- responsibility for the illegal use and disposal of Inside Information.

1.3. Any Inside Information falling under the remit of Catalogue-040 “Confidential Information” shall be deemed to be any information that constitutes any commercial or other confidential information pertaining to the Company. Procedures for dealing with any Inside Information that constitutes such confidential information pertaining to the Company (including the compilation, record keeping and/or reporting, retention, delivery and transmission thereof), as well any access to such information granted to employees shall be subject to internal regulation governing the process for implementing measures to ensure the non-disclosure of commercial confidentiality.

II. Interpretation

2.1. The following definitions are used in this Regulation:

2.1.1. **Inside Information** is any accurate and/or specific information that has not been distributed (including information or data of a commercial or official nature, and

other confidential information protected by law), and the distribution of which might have a material effect on the value of the Company's securities. The Inside Information List of Gazprom Neft PJSC is approved by the order of the Chief Executive Officer.

Such Inside Information does not include:

- 1) information that has been made public, including as a result of its distribution; and
- 2) studies, forecasts, and estimates related to the Company's securities, as well as recommendations and /or proposals regarding the conduct of transactions involving the Company's securities, conducted on the basis of publicly available information.

2.1.2. The **Furnishing of Information** is any action by a specific group of people directed at obtaining information, pursuant to Russian Federation securities legislation;

2.1.3. The **Distribution of Information** is any action:

- 1) by non-specific persons directed at obtaining or transferring information to non-specific persons, including through its disclosure, pursuant to Russian Federation securities legislation;
- 2) associated with the publication (disclosure) of information through the media, including electronic, information and telecommunications networks with non-restricted access (including the information and Internet telecommunication network); and
- 3) associated with the distribution of information through electronic, information and telecommunications networks with non-restricted access (including the Internet information and telecommunication network).

2.1.4. **Insiders** are individuals or legal entities which have been granted access to Inside Information on various grounds, including:

- 1) persons who have the right to cast (directly or indirectly, via the persons controlled by them) at least 25 percent of the votes at the Company's General Meeting of Shareholders, as well as persons having access to such Inside Information through shareholdings in the Company's authorised capital under federal legislation or constituent (foundation) documents or internal regulations;
- 2) persons and/or entities having access to Inside Information pertaining to the Company under agreements entered into with such persons and/or entities, including auditors (audit companies), appraisers/adjusters/valuers (legal entities having entered into employment contracts with such appraisers/adjusters/valuers), professional securities market participants, credit institutions, insurance companies, controlled companies which are material to the Company¹;
- 3) Members of the Board of Directors, members of the Management Board, the Chief Executive Officer of the Company;
- 4) information agencies that disclose information;

¹ The list of controlled entities material to the Company is provided in Catalogue-436

- 5) persons and/or entities responsible for assigning credit ratings to the Company and the Company's securities;
- 6) individuals with access to the Company's Inside Information under employment contracts and/or other contractual agreements under civil law made with such individuals; and
- 7) any other individuals provided for under Article 4 of the Law.

A specific list of Insiders is defined under the Company Insider List.

2.1.5. **Legitimate interests** may include but are not limited to the following situations:

- 1) ongoing negotiations or any elements relating thereto, the outcomes or normal course of which might be affected by the public disclosure of information; and
- 2) any situation in which any decision by an executive agency of the Company entering into force is subject to approval by another executive agency of the Company (and such separation is required under the Company's corporate structure), and public disclosure of such information prior to such approval, where the concurrent announcement that such approval is still pending, might prevent the proper evaluation of such information by the public.

2.1.6. The **Insider List** is a list of Insiders who have access to Inside Information of the Company on a legal basis, compiled pursuant to the requirements set forth in Article 9 of the Law.

2.1.7. The **Company Insider Register** is an electronic database or spreadsheet containing information on those persons included in/excluded from the Company Insider List.

2.1.8. The **Unlawful Use of Inside Information** is any violation of the prohibitions referred to in Paragraph 4.1 of this Regulation by those individuals cited in the Insider List.

2.1.9. **Securities** are ordinary shares and bonds pertaining to the Company eligible for exchange trading in the Russian Federation and/or in respect of which the Company has filed an application for such exchange trading, and depository receipts for the Company's shares traded on the trading platforms of the European Union.

2.1.10. **Market Manipulation** means wilful acts defined by the laws of the Russian Federation on combatting unlawful use of Insider Information and market manipulation or the regulations of the Bank of Russia and as a result of which the price, demand, supply or volume of trading with the Company's securities departed from the level or were maintained on a level which is materially different from the level which would have occurred without such acts.

2.1.11. **Controlled Person (Controlled Entity)** is a legal entity directly or indirectly controlled by the Company.

2.1.12. **Authorised Subdivision** is a structural subdivision of the Company charged, as per the order of the CEO, with the responsibility to monitor compliance by the Company with the laws and regulations of the Russian Federation on combatting unlawful use of Insider Information and market manipulation.

2.1.13. **RSS news** is web resource updated in real time and provided, pursuant to a contract with the Company, by the information agency authorised to disclose information on the securities market.

In order to ensure the prompt notification of Company Insiders the updated List of Company Securities is disclosed on the Company website, under “Insiders”.

III. Procedure and Timeframe for the Disclosure of Inside Information and Procedure for Accessing Inside Information

3.1. The procedure and timeframe for the disclosure of Inside Information, the list of which is approved by the Bank of Russia’s regulation, shall be defined by the Bank of Russia’s regulations, unless otherwise provided for by the Law.

3.2. The Company’s Inside Information (certain types of Inside Information) that is not included in the list of Inside Information approved by the Bank of Russia shall be disclosed pursuant to the following procedure:

- 1) the text of the document containing such Inside Information shall be published on the Company’s official website on the Internet information and telecommunication network within 2 days following the occurrence of the pertinent event and/or approval (execution) by the Company’s authorised body of the relevant document and if such authorised body is a collegial body, then within 2 days following the date of the minutes (last day of the period allowed by the laws of the Russian Federation for making such minutes) of the meeting of such authorised collegial body of the Company;
- 2) copies of the document containing the Company’s Inside Information shall be provided upon request to any interested party within 7 days following receipt (submission) of such request for a fee which shall not exceed the costs of making such copy;
- 3) the date when disclosure of any such information falls due and the form of its disclosure shall be defined in the List of Inside Information approved by the order of the CEO.

3.3. The Inside Information shall be published on the Company’s official website www.ir.gazprom-neft.ru on the Internet information and telecommunication network.

If, following the disclosure or provision of such Inside Information, those facts listed in the above information change, then information pertaining thereto shall be disclosed or provided no later than the next business day following the day on which such changes were or should have been reported.

3.4. Following the posting of such information on the Internet the Company shall ensure free and unhindered access to such Inside Information during at least 12 months following the day of its disclosure.

3.5. The Company shall independently evaluate whether the Company’s legitimate interests might be violated through the disclosure of Inside Information.

3.6. The Company shall not disclose future plans that might be impacted or impaired by the premature disclosure of information.

3.7. The Company may selectively disclose Inside Information to persons for the fulfilment of their official, professional or employment responsibilities. In such cases, such individuals shall be bound to maintain and protect confidentiality. Such individuals include but are not limited to the following:

- 1) consultants to the Company;
- 2) the Company's underwriters;
- 3) the Company's employees;
- 4) any governmental authorities vested with the relevant powers pursuant to the laws and regulations of the Russian Federation;
- 5) the Company's creditors;
- 6) rating agencies;
- 7) persons who, being holders of shares in the Company's capital, have access to Inside Information or persons exercising the rights attached to the shares held by such persons and their representatives.

3.8. Those Company employees authorised to communicate with the public and shareholders as part of their official duties shall provide equal opportunities to all interested parties in ensuring simultaneous access to Inside Information concerning the Company that is subject to disclosure, and shall take appropriate measures to refute any false information where the distribution of such false information might damage the Company, its business reputation and shareholders.

IV. Restrictions on the Use of Inside Information; Prohibited Distribution of False or Misleading Information

4.1. The use of Inside Information is prohibited:

- 1) in carrying out transactions with Company securities to which Inside Information pertains, either at the Company's own expense or that of a third party, except where conducting a transaction in the fulfilment of any obligation to sell or purchase Company securities within a trade date, where such obligation arises from any transaction undertaken in advance of such individual becoming aware of any Inside Information;
- 2) in transferring such Inside Information to any other person, except where transferred to a person included in the Insider List, in order to fulfil obligations established under Federal legislation or in the performance of employment responsibilities or in the performance of any contract; and
- 3) in giving recommendations, binding or otherwise, to third parties, encouraging them to sell or purchase Company securities.

4.2. The performance of activities related to market manipulation is prohibited, pursuant to the Law.

4.3. All Company employees and other persons having access to Inside Information are prohibited from deliberately distributing false, incorrect or misleading information, and from delaying the disclosure of Inside Information where there is no reason for doing so, and from taking any other misleading actions that might affect the value of the Company's securities.

4.4. In all cases, the right to make official statements on behalf of the Company or to otherwise distribute information about the Company shall be extended only to those persons listed under "Regulations on Information Policy of Gazprom Neft PJSC".

4.5. Any disclosure of Inside Information in official statements or submissions by any of the persons specified in Clause 4.4 of this Regulation does not absolve the Company of its

obligations to disclose such Inside Information in the manner and within the timeframe determined by the Bank of Russia and the Company's Board of Directors.

V. Procedure for Maintaining the Company Insider List, for Notifying Persons Included In/Removed from the List of Such Inclusion/Removal, and Transmission of Such Facts to Securities Market Operators and the Authorised Executive Agency

5.1. The Company Insider List is a list of persons who have or have had legal access to the Company's Inside Information over a certain period of time, including access to physical media, files and databases containing such Information .

5.2. Any person on the Company Insider List shall be authorised to access the Company's Inside Information, including physical media, files and databases.

5.3. Any person removed from the Insider List shall be prohibited from accessing the Company's Inside Information, including physical media, files and databases.

5.4. The Company Insider List shall include the persons mentioned in paras. 2-6 of Clause 2.1.4 of the present Regulation.

5.5. Maintenance of the Insider List shall be undertaken by the Company's Corporate and Project Support Department (hereafter "the CPSD").

5.6. The Insider List shall be maintained electronically in the form of the Register of Company Insiders, specifically as an SAP HR electronic database and/or spreadsheet containing information on those persons included in/removed from the Company Insider List.

5.7. The Register of Company Insiders shall allow the identification of those persons included in the Company Insider List, shall enable the creation of a list of Company Insiders current as at any date or period, shall allow the updating of the List, shall generate notifications for the inclusion/removal of persons to/from the List, shall allow the List (and notifications pertaining thereto) to be printed and distributed (with all appropriate amendments thereto) to securities market operators (hereafter "market operators"), and shall allow such List to be filed with the authorised federal executive agency for the securities market, at its request.

5.8. The CPSD shall ensure the ongoing maintenance of the Company Insider Register by collecting, adding, processing, and retaining data on the Company Insider Register. All data included in the Company Insider Register shall be treated as permanent records.

5.9. Where a person is included in the Company Insider List, a record entry in respect of such person shall be created in the Company Insider Register.

5.10. The Company Insider Register shall include the following information on Company Insiders (individuals):

- 1) full name (patronymic, if any);
- 2) mailing address;
- 3) other contact information (phone numbers, email addresses);
- 4) passport number and series (or any other primary identification document for such Company Insider, if non-resident in the Russian Federation);
- 5) date (dates) of registration in the Company Insider Register;
- 6) date (dates) of inclusion in the Company's Insider List;

- 7) grounds for inclusion in the Company Insider List (details of the document referred to in Clause 5.14 of the present Regulation);
- 8) information on notification of inclusion in the Company Insider List, specifying: status ("Informed" or "Not Informed"), date of notification, method of notification ("By signed receipt", "By post", "Otherwise"), justification of any failure of notification ("Circumstances beyond our Control" or "Avoidance of Receipt"), and the date on which any report on such failure of notification was prepared;
- 9) the date(s) of any removal from the Company Insider List;
- 10) the grounds for any removal from the Company Insider List (details of the document referred to in Clause 5.18 of the present Regulation); and
- 11) information on any notification of removal from the Company Insider List specifying: status ("Informed" or "Not Informed"), date of notification, method of notification ("By signed receipt", "By post", "Otherwise"), justification of any failure of notification ("Circumstances beyond our Control" or "Avoidance of Receipt"), and the date on which any report on such failure of notification was prepared.

5.11. The Company Insider Register shall include the following information on Company Insiders (legal entities):

- 1) the full name of the company;
- 2) the Individual Taxpayer Number (INN);
- 3) the Primary State Registration Number (OGRN);
- 4) location;
- 5) other contact information (postal address, phone numbers, email accounts, fax numbers, telex, full name of the CEO, full names of contact persons);
- 6) date(s) of registration in the Company Insider List;
- 7) date(s) of inclusion in the Company Insider List;
- 8) grounds for inclusion in the Company Insider List (details of the document referred to in Clause 5.14 of the present Regulation);
- 9) information on notification of inclusion into the Insider List, specifying: status ("Informed" or "Not Informed"), date of notification, method of notification ("By signed receipt", "By post", "Otherwise"), justification of any failure of notification ("Circumstances beyond our Control" or "Avoidance of Receipt"), and the date on which any report on such failure of notification was prepared;
- 10) date (dates) of removal from the Company Insider List;
- 11) the grounds for any removal from the Company Insider List (details of the document referred to in Clause 5.20 of the present Regulation); and
- 12) information on any notification of removal from the Company Insider List specifying: status ("Informed" or "Not Informed"), date of notification, method of notification ("By signed receipt", "By post", "Otherwise"), justification of any failure of notification ("Circumstances beyond our Control" or "Avoidance of Receipt"), and the date on which any report on such failure of notification was prepared.

5.12. When a new record is added to the Company Insider Register it shall include information stated in Clause 5.10, Sub-clauses 1 through 8 (for individuals) or in Clause 5.11, Sub-clauses 1 through 9 (for legal entities) of the present Regulation, and shall

record the surname and initials of the officer of the authorised division adding such information to the Company Insider Register.

5.13. When changes are made to the Company Insider Register any previous records shall be retained, as well as all information on the date on which such changes were made, including the surname and initials of the officer of the authorised division making such changes.

5.14. A person shall be included in the Insider List on the basis of:

- 1) a decision by the General Meeting of Shareholders or the Board of Directors of the Company (to be recorded in the Minutes) regarding the appointment (reappointment) of a member of the Board of Directors, a member of the Management Board, the CEO of the Company;
- 2) an agreement or contract (details of such employment, civil law or any other agreement or contract to be specified).

5.15. In order to maintain the Company Insider Register, the responsible officers of the CPSD shall have the right to request any available information provided for under Clause 5.10 herein from those persons included in the Company Insider List.

5.16. Where a person included in the Insider List refuses to provide such information provided for under Clause 5.10 herein at the request of the responsible CPSD officer, the Director of the CPSD shall notify the Company's Deputy CEO responsible for the management of structural units or departments within the Administration Division, as soon as possible.

5.17. Failure by any person subject to inclusion in the Company Insider List to submit available information provided for under Clause 5.10 herein at the request of the responsible CPSD officer shall serve as grounds for withholding such person's access to Inside Information and, if such person is an employee of the Company, shall serve as grounds for disciplinary action against him/her.

5.18. Individuals (persons) shall be removed from the Company Insider List on the basis of:

- 1) any decision by the CEO of the Company pursuant to which such person has ceased to enjoy appropriate authorisation;
- 2) termination, including early termination, of the powers of the person appointed as member of the Board of Directors or member of the Management Board of the Company;
- 3) the termination (expiry) of an agreement;
- 4) other reasons (including death of the natural person, exclusion of a legal entity from the National Register of Legal Entities as inactive etc.).

5.19. Inclusion of an individual on the Company Insider List and the filing of information provided for under Clauses 5.10 and 5.11 of this Regulation shall be added to the Company Insider Register not later than five business days following the date:

- 1) on which any decision referred to in Clause 5.14 herein was made;
- 2) on which any agreement was signed (terminated, expired).

5.20. In the event that the Company signs an agreement (contract) with a legal entity and such agreement provides for the transfer of Inside Information to such entity, the structural unit (subsidiary) having prepared such agreement (contract) shall notify such entity that it will be included in the Company Insider List and about the provisions of the Law and

responsibility for any unlawful use of Inside Information. After the agreement (contract) is made, the structural division shall notify the CPSD of the details of such agreement (contract) and the dates of its entering into force and expiry and, thereafter, the date of any termination and/or extended validity period.

5.21. In the event that information cited under Clauses 5.10 and 5.11 herein is changed, any person included in the Company Insider List shall provide new (updated) information to the CPSD of the Company as soon as possible.

5.22. Data shall be added into the Company Insider Register as provided under Clauses 5.10 and 5.11 herein not later than five (5) business days following the date of receipt of such new (updated) information by the CPSD from the person updating such information.

5.23. In the event that a person included in the Insider List fails to submit new (updated) information as stipulated under Clauses 5.10 and 5.11 herein, then such failure shall serve as grounds for denying access to Company Inside Information; and if such person is an employee of the Company disciplinary action shall be taken against him/her.

5.24. The CPSD shall notify any person included in or removed from the Insider List of such inclusion (removal) pursuant to the format stated in Appendix 1 hereto.

5.25. The notification shall be delivered within seven (7) business days of the date of the person's inclusion in/removal from the Company Insider List by an authorised CPSD official in any of the following ways:

- in the form of an electronic document by the use of appropriate hardware and software and of the Internet;
- in the form of an electronic document by the use of information systems and hardware and software complexes of the Company used for corporate information interaction (including e-mail);
- in hard form (on paper) by registered mail with notification of receipt (by another registered postal item with notification to the sender of delivery to the addressee) or by forwarding to a courier service or by other means that enable receipt of the notification to be confirmed.

5.26. The CPSD shall maintain records of all notifications sent pursuant to this Regulation.

5.27. The CPSD shall remove a person from the Company Insider List within five (5) business days of any event giving rise to appropriate grounds for removal from the Insider List as provided for under Clause 5.18 of this Regulation (any order, signed by the CEO (or person acting on his/her behalf) including the removal of a person from their role or position; the termination (expiry) of an agreement or contract; or the receipt of an internal memorandum by the CPSD).

5.28. The CPSD shall pass the Company Insider List to Russian securities market operators performing transactions involving Company securities (hereinafter the "trading organisers") upon their request pursuant to the procedure established by the Bank of Russia.

The CPSD shall forward the Company Insider List to international securities market operators at their request in the manner and within the timeframe defined in such request, and pursuant to applicable legislation.

5.29. The CPSD shall forward the Company Insider List to the Bank of Russia at its request in the manner and within the timeframe defined in such request (order/instruction).

5.30. The CPSD shall arrange the preparation and sending to the Bank of Russia of notifications about operations by the Company with securities and goods of legal entities that have included the Company in the lists of their Insiders, as well as with derivative financial instruments, the price of which depends on such securities and goods, in the manner and the timeframes prescribed by the Bank of Russia

5.31. The CPSD shall review all requests and requirements from the Bank of Russia delivered to the Company and related to compliance with the Law, and shall prepare responses to these.

5.33. The CPSD shall consult the Company's employees on issues related to compliance with the Law.

VI. Obligations of Individuals Included in the Company Insider List

6.1. The Company may, no more than once per month, request from the individuals included in the Company Insider List information regarding their operations involving the Company's securities and the execution of agreements treated as financial derivatives whose price may be affected by such securities.

6.2. Insiders included in the List of Insiders of the Company who have received a request from the Authorised Subdivision to provide information in accordance with Clause 6.1. of the present Regulation (hereinafter "a request"), signed by the head of the Authorised Subdivision and containing the period for which the information must be provided, and sent in a way that enables the Insider to confirm the fact of its receipt, shall provide a response containing the requested information (hereinafter "a response to the request"), within the period specified in the request, which must be at least 10 working days from the date of receipt by the Insider of the request, in a form that accords with Appendix № 2 to the present Regulations.

6.3. If the information specified in the request refers to operations (agreements) that the Insider did not perform (did not conclude) during the period for which information is to be provided in accordance with the request, the Insider shall, in their response to the request, provide information about such non-performance (non-conclusion) of the operations (contracts).

6.4. Insiders shall provide a response to the request to the Authorised Subdivision in the form of an electronic document in one of the following ways, at the choice of the Insider:

- by use of hardware and software and the Internet information and telecommunications network;
- on an electronic data carrier (CD, flash drive) by courier or registered mail with notification of receipt;
- via information systems and software and hardware complexes of the Company that are used for corporate information interaction (including e-mail) (for Insiders specified in Subclauses 3 and 6 of Clause 2.1.4).

If there are circumstances that prevent the Insider from meeting the request in the form of an electronic document in one of the ways specified in Clause 6.4 of the present Regulation, the Insider shall provide the Authorised Subdivision with a response to the request in hard copy of his choice by courier or registered mail with notification of receipt.

6.5. Accounting and storage of the Company's requests and information received from Insiders is the responsibility of the Authorised Subdivision.

VII. Procedure for Insiders of Gazprom Neft PJSC to Perform Their Operations with the Company's Financial Instruments

7.1. In order to avoid the risk of an operation with the financial instruments of Gazprom Neft PJSC being deemed a non-standard transaction, Company Insiders should observe the following conditions when carrying out transactions:

7.1.1. the persons included in the Company Insider List should refrain from transactions undertaken in their own interests or in the interests of third parties involving Company securities or derivatives for a period of 30 calendar days prior to the publication of annual (year-end) consolidated or interim consolidated financial (accounting) statements of the Company;

7.1.2. during 30 calendar days after entering into a transaction with a financial instrument of Gazprom Neft PJSC, the Insider's position (portfolio) should remain unchanged.

VIII. Liability for the Illegal Use of Inside Information

8.1. Pursuant to Article 71 of Federal Law No. 208-FZ "On Joint Stock Companies", the Company Charter and other internal documents regulating the activities of the Company's governing bodies, members of the Board of Directors, members of the Management Board, and the CEO of the Company shall act in the Company's interests reasonably and in good faith when exercising their rights and performing their duties.

8.2. These persons shall be liable to the Company for any damages caused by their actions (failure to act) pursuant to legislation of the Russian Federation.

8.3. The Company or the shareholder(s) of the Company shall have the right to file a claim in court requesting compensation for damages against any person or persons, including Company officers, having illegally used or disclosed Inside Information, including on the Company's behalf, or having knowingly used or disclosed false, incorrect or misleading information where this has resulted in a significant change in the price of the Company's securities.

8.4. Disciplinary action, including dismissal, may be taken, pursuant to legislation currently in force in the Russian Federation and pursuant to the Company's internal regulations, against any Company employees having illegally used Inside Information or having disclosed, including on the Company's behalf, information known to be false, incorrect or misleading where this has resulted in a significant change in the price of Company's securities; and against any Company's employees having transgressed the prohibitions established by the Law or having failed to comply with the requirements determined by the Law and regulations adopted pursuant to the Law and under the present Regulation.

8.5. Any person who distributed false information shall not be liable for market manipulation, if such person did not know and was not required to know that the information distributed was false.

8.6. Any person using Inside Information shall not be liable for unlawful use of Inside Information, where such person did not know or was not required to know that such information was Inside Information. The Company, its officers and employees shall not be held liable for any absence from their own Inside Information lists of information not included in the Inside Information list of issuers, which have been approved by the Bank of Russia's regulation pursuant to Part 1 of Article 3 of the Law.

IX. Procedure for Accessing Company Inside Information and Rules for Protecting Its Confidentiality

9.1. Access to Company Inside Information, including access to files and databases and any media or storage devices for retaining such Company Inside Information, shall only be granted to the following persons:

- 1) persons included in the Company Insider List;
- 2) persons performing responsibilities established under federal legislation, in the course of executing such responsibilities.

9.2. Access to Company Inside Information shall be granted to those persons included in the Company Insider List after information on such persons has been added to the Company Insider List.

9.4. Persons included in the Company Insider List, on receiving notification of their inclusion in such List, shall familiarise themselves with requirements of the Law and regulatory acts of the Bank of Russia adopted pursuant to the Law, and also with the Company Inside Information List, as posted on the official Company website in the Internet.

9.5. The following initiatives shall be undertaken in order to limit access to Company Inside Information:

- 1) familiarise those persons included in the Company Insider List with the Company's Inside Information List;
- 2) familiarise those persons included in the Company Insider List with the list of financial instruments, which, in the event of any transaction or operations being undertaken with them, require the person carrying out such operations to provide information about such transactions at the request of the Company and the Bank of Russia;
- 3) for those persons included in the Company Insider List, create an appropriate organisational and technical environment to ensure adherence to a regime of limited access to and use of Company Inside Information, including the use of personal electronic keys and passwords;
- 4) adopt measures to protect Company Inside Information, including initiatives to prevent the leakage or theft of Company Inside Information through technical channels; through the unauthorised destruction, misrepresentation, counterfeiting, copying, distribution, or blocking of Company Inside Information in Company information systems; and through unauthorised or accidental access to Company Inside Information;
- 5) the Company employees and its management bodies shall familiarise themselves with the procedure for accessing Inside Information and the rules of its confidentiality;
- 6) provide the Company shareholders (except the persons mentioned in para. 1 of Clause 2.1.4. above), on request, with data relating to Company Inside Information within the timeframe established under legislation of the Russian Federation only after the Information has been disclosed in the prescribed manner.

9.6. For the purposes of limiting access to the Company's Inside Information those persons included in the Company Insider List shall:

- 1) comply with the regime limiting access to and use of Inside Information; and
- 2) in the event of any loss of data storage devices (electronic, magnetic, optical, hard copies), missing documents, or files containing Company Inside Information being discovered, or on detection of unauthorised access to Company Inside Information, the Company officer responsible for monitoring compliance with the Law and regulation adopted pursuant thereto shall be notified immediately.

9.7. In the event of government agencies or organisations applying to the Company to obtain Company Inside Information as specified under sub-clause 1.3. of this Regulation or to access storage devices therefore in connection with the performance of their responsibilities as provided for under federal legislation, such provision shall be undertaken as prescribed in M-12.02.01-02 "Instruction on the Transfer of Information Constituting a Trade Secret and Other Confidential Information to State Agencies or Other Government Organisations, Local Autonomous Organisations and Counterparties".

X. Rules on Monitoring the Company's Compliance with the Requirements Determined under Legislation of the Russian Federation on Preventing the Illegal Use of Inside Information and Market Manipulation

10.1. The authorised unit shall control the Company's compliance with the requirements set forth by the laws of the Russian Federation on efforts to counter illegal use of Insider Information and market manipulation.

10.2. The Head of the authorised unit shall be responsible for undertaking internal monitoring and control to prevent the illegal use of Inside Information and market manipulation within the Company.

10.4. The authorised unit shall:

- 1) monitor the execution of/compliance with requirements, restrictions and prohibitions established under legislation of the Russian Federation on efforts to prevent the illegal use of Inside Information and market manipulation by the Company, its employees, as well as individuals on the Company Insider List;
- 2) evaluate compliance risk taking into account the probability of its occurrence and effect on the Company's operations;
- 3) immediately notify the CEO or the head of the internal audit function about any violations or possible violations of law and of the Company's internal regulations regarding illegal use of Insider Information and market manipulation;
- 4) participate in the design of internal regulations and the arranging of actions to ensure compliance with the laws and regulation on efforts to counter illegal use of Insider Information and market manipulation;
- 5) consult employees on matters related to the application of the Internal Control Rules and compliance with laws and regulations on efforts to counter illegal use of Insider Information and market manipulation;
- 6) arrange and participate in identifying deals and transactions with attributes of illegal use of Insider Information and market manipulation, check non-standard transactions; participate in reviewing requests, complaints and queries related to efforts to counter illegal use of Insider Information and market manipulation;

- 7) liaise with the Bank of Russia on matters related to efforts to counter illegal use of Insider Information and market manipulation;
- 8) monitor observance of the procedure for accessing Inside Information and the rules of its confidentiality;
- 9) monitor preparation of the list of the Company's Inside Information;
- 10) monitor observance of the procedure and timing of Inside Information disclosure;
- 11) submit to the CEO an annual report on the results of monitoring the execution of/compliance with requirements, restrictions and prohibitions established under legislation of the Russian Federation on efforts to prevent the illegal use of Inside Information and market manipulation by the Company, its employees, as well as individuals on the Company Insider List;
- 12) make recommendations on ways of addressing violations that have been identified; and
- 13) carry out other measures and actions governed by the Company's internal regulations directed at preventing, detecting, and intercepting any violations of legislation on Insider Information.

10.4. In the course of inspections provided for under Clause 10.3. herein, the Head of the authorised unit shall have the right to request the structural units of the Company and its employees, as well as other persons on the Company Insider List and subject to such inspections, to provide relevant documents, copies thereof, written and oral explanations, and other information.

10.5. In order to promptly identify and monitor areas of possible unlawful use of Inside Information, the authorised unit shall systematically verify conformity with the provisions of the present Regulation by persons who have access to Inside Information and other Company employees in order to prevent any possible concealment or illegal acts.

10.6. The authorised unit may, on its own initiative, at any time carry out the above verification of due compliance with the provisions of this Regulation, the Law and other regulations governing the relationships associated with the use of Inside Information; specifically, the unit may demand explanations from the Company's employees, review documents and have access to the technical devices which the Company uses to store, process and protect Insider Information.

10.7. In order to perform its functions effectively and without obstructions, the authorised unit shall have access to any of the Company's rooms or offices where, in its reasonable opinion, the Company's Inside Information may be kept and all the Company's officers and employees shall provide the authorised unit with every assistance in performing its functions.

XI. Miscellaneous

11.1. For the purposes of compliance with the Law and related regulations, the Company may design internal rules and regulations, the approval of which does not fall within the competence of the Company's Board of Directors.

Dated ____ 202__

No

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NOTIFICATION**on the Inclusion (Removal) of Persons/Entities in/from the List**

№	Item	To be completed by notifying person/entity
1	2	3
1	About the notification	
1.1	Serial number and date of the notification	
2	About the notifying person/entity	
2.1	Full name of the company	Public Joint Stock Company Gazprom Neft
2.2	Location and (or) address for postal correspondence (if any)	Pochtamtskaya ulitsa d. 3–5, 190000 St Petersburg, Russia
2.3	Primary state registration number (OGRN), taxpayer identification number (TIN).	1025501701686 5504036333
2.4	Site address in the Internet information and telecommunications network	www.gazprom-neft.ru
2.5	Contact phone number and (or) email address for inquiries by Insiders (persons excluded from the list)	+7(812) 363-31-52 corpcontrol@gazprom-neft.ru
2.6	Number of clause of Article 4 of Federal Law No. 224-FZ, dated July 27, 2010, according to which the notifying person is an Insider	Clause 1
3	About the Insider (person/entity excluded from the List)	
Concerning an Insider (person/entity excluded from the List) who is a Russian or foreign legal entity (a foreign organisation that is not a legal entity in accordance with the law of the country where the organisation was established)		
3.1	Full corporate name (for an Insider (person/entity excluded from the List) of a Russian legal entity that is a commercial organisation); name (for an Insider (person/entity excluded from the List) of a legal entity that is a Russian non-profit organisation, a foreign legal entity, or a foreign organisation that is not a legal entity in accordance with the law of the country where the organisation is established)	
3.2	Location and (or) postal correspondence address (if any)	
3.3	OGRN, TIN (if any)	
3.4	Code of foreign organisation (if any) and code in Country Classifier	
3.5	Registration number in the country of registration	
3.6	Financial instrument, foreign currency and (or) commodity	

1	2	3
3.7	Grounds for inclusion of the Insider in the List	
3.8	Grounds for which an Insider excluded from the List ceased to fall under the provisions of Article 4 of Federal Law No. 224-FZ, dated July 27, 2010	
3.9	Information on inclusion of an Insider in the List (exclusion from the List) and the date of such inclusion (exclusion)	
Concerning an Insider (person/entity excluded from the List) who is an individual		
3.10	Surname, name, patronymic (if any)	
3.11	Date of birth	
3.12	Place of birth (if known)	
3.13	Position held by Insider (person excluded from the List) in the notifying entity)(in any)	
3.14	Financial instrument, foreign currency and (or) commodity	
3.15	Basis for inclusion of the Insider in the List	
3.16	Grounds for which an Insider excluded from the List ceased to fall under the provisions of Article 4 of Federal Law No. 224-FZ, dated July 27, 2010	
3.17	Information on inclusion of an Insider in the List (exclusion from the List) and the date of such inclusion (exclusion)	
4	Information notice on the requirements of Federal Law No. 224-FZ, dated July 27, 2010, as provided for by Clause 2 of Part 1 of Article 9 of Federal Law No. 224-FZ, dated July 27, 2010	
<p>From the date of inclusion of a person/entity in the list of Insiders of the Organisation, restrictions come into force as provided for by Article 6 of Federal Law No. 224-FZ of July 27, 2010 “On Efforts to Counter the Illegal Use of Inside Information and Market Manipulation and on Amendments to Certain Legislative Acts of the Russian Federation” (“the Federal Law”), and liability is determined in accordance with Article 7 of the Federal Law, and such a person/entity is assigned the duties provided for by Article 10 of the Federal Law:</p> <p>DUTIES OF THE INSIDER:</p> <p>To comply with the requirements of legislation and internal documents of Gazprom Neft PJSC in the sphere of Insider Information.</p> <p>To provide information regarding transactions with financial instruments of Gazprom Neft PJSC at the request of the Company.</p> <p>To comply with the procedure for concluding transactions with financial instruments of Gazprom Neft PJSC</p> <p>THE INSIDER IS NOT PERMITTED:</p> <p>To disclose Insider Information of Gazprom Neft PJSC.</p> <p>To use Insider Information for personal purposes or in the interests of third parties, as well as for transactions with financial instruments of Gazprom Neft PJSC at their own expense or at the expense of third parties.</p> <p>To transfer Insider Information to another person/entity, except for cases of transfer to a person included in the List of Insiders of Gazprom Neft PJSC, in connection with the performance of duties established by federal laws, or in connection with the performance of work duties or the performance of a contract.</p> <p>To perform actions that qualify as market manipulation.</p> <p>To use Insider Information to make recommendations, oblige, induce third parties to perform transactions with financial instruments of Gazprom Neft PJSC.</p> <p>To carry out transactions in their own interests or in the interests of third parties relating to the securities of Gazprom Neft PJSC within 30 calendar days prior to the date of publication of the annual</p>		

1	2	3
	consolidated and interim consolidated financial statements. To carry out transactions in their own interests or in the interests of third parties within a period of 30 calendar days from the date of purchase of financial instruments of Gazprom Neft PJSC (in case of their subsequent sale).	

(initials, surname)

(signature)

(name of post, date of signature)

Gazprom Neft PJSC

**NOTIFICATION
on the Execution of a Transaction by an Insider Involving a Financial Instrument,
Foreign Currency or Goods**

1. Full name of Insider who is a physical person/ Full commercial name of Insider which is a legal entity	
2. Type and details of Insider's Identification document (for a physical person)/ INN or OGRN of Insider (for a legal entity)	
3. Insider's registered residential address (for a physical person)/ Insider's registered business address (for a legal entity)	
4. Full trading (business) name of the entity, which has included the Insider in its Insider List	
5. Date of transaction	
6. Type of transaction	
7. Value of transaction (operation)	
8. Location of transaction (name of market operator or over-the-counter (OTC) market)	
9. Type, category, series of financial instrument (to be specified for securities transactions)	
10. Full trading (business) name of the issuer of such security (to be specified for securities transactions)	
11. State registration number of the security (to be specified for securities transactions)	
12. Price of one security (to be specified for all securities transactions, excluding repo transactions)	
13. Purchase and sale price of one security in the repo contract(s)	
14. Number of securities (to be specified for securities transactions)	
15. Contract type involving a financial derivative (to be specified for derivative transactions)	
16. Name (description) of the financial derivative contract accepted by the securities market operator (to be specified for derivative transactions)	
17. Value of a single financial derivative contract (option rate) (to be specified for derivative transactions)	
18. Number of financial derivative contracts (to be specified for derivative transactions)	

19. Strike price of financial derivative contract (to be specified for derivative transactions)	
20. Currency (to be specified for currency transactions)	
21. Goods type (to be specified for transactions involving goods)	
22. Quantity of goods (to be specified for transactions involving goods)	
23. Unit price (to be specified for transactions involving goods)	

(date)

(signature)*

(Print full name)*

* Delivered in the event of notification being forwarded on paper