

**APPROVED**

**by Resolution of the Board of Directors**

**Rosneft**

**"09" March 2022**

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**dated "28" March 2022 № 158**

## **STANDARD OF ROSNEFT**

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# **INTERNAL CONTROL RULES FOR THE PREVENTION, DETECTION AND SUPPRESSION OF ILLEGAL USE OF INSIDER INFORMATION IN ROSNEFT AND (OR) MARKET MANIPULATION**

**№ P3-01 R-0049 UL-001**

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# 1. INTRODUCTORY PROVISIONS

## PURPOSE

The Regulation has been developed in compliance with provisions of Article 11 of the Federal Law dated 27.07.2010 № 224-FZ "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation" and Bank of Russia regulations adopted in accordance therewith and establishes the requirements for the following business processes:

- prevention of unlawful use of insider information of Rosneft and (or) market manipulation;
- control over fulfillment of Rosneft obligations to prevent, detect and suppress the misuse of Rosneft insider information and market manipulation;

including:

- procedure of access to the insider information of Rosneft;
- procedure of protection of confidentiality of the insider information of Rosneft;
- procedure of control over observance by Rosneft of the requirements of the legislation of the Russian Federation and the regulatory acts of the Bank of Russia in the field of countermeasure to misuse of the insider information;
- terms and conditions of transactions with financial instruments of Rosneft by the persons specified in Clauses 7 and 13 of Article 4 of the Federal Law dated 27.07.2010 № 224-FZ "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation", included in the Rosneft List of Insiders and Related Parties.

## SCOPE

This Standard shall be binding on Rosneft employees.

Access to this Policy shall not be restricted. An electronic copy of this Policy is available on Rosneft official website: [www.rosneft.ru](http://www.rosneft.ru) and [www.rosneft.com](http://www.rosneft.com).

## VALIDITY PERIOD AND ENFORCEMENT PROCEDURE

This Standard is a local normative document of permanent effect.

This Standard shall be approved, deemed invalid or amended in Rosneft by the decision of the Rosneft Board of Directors and put into effect in Rosneft by the order of Rosneft.

## 2. GLOSSARY

### 2.1. CORPORATE GLOSSARY TERMS

This Standard uses the terms of the Corporate Glossary: *Information System, Information Resource, Consolidated Financial Statements, Confidential Information (Information of Confidential Nature), Conflict of Interest, Local Normative Document (LND), Independent Structural Unit (ISU).*

### 2.2. ROLES OF THE CORPORATE GLOSSARY

This Standard uses the roles of the Corporate Glossary: *Counterparty*.

### 2.3. TERMS FROM EXTERNAL DOCUMENTS

This Standard uses the terms of the following external documents: *Close Relatives [para 4, article 5 of Criminal Procedure Code of the Russian Federation dated December 18, 2001 № 174-FZ], Market Manipulation [para 8, article 2 of Federal Law On Prevention of Unlawful Use of Insider Information and Market Manipulations and On Modifying Certain Legal Acts of the Russian Federation dated July 27, 2010 № 224-FZ], International Financial Reporting Standards [para 5 of International Financial Reporting Standard (IAS) 8 Accounting Policy, Changes in Accounting Estimates and Errors (enacted in the Russian Federation by Order № 217n of the Russian Ministry of Finance on December 28, 2015)], Trade Organizer [para 6, article 2 of Federal Law On Organized Trading № 325-FZ dated November 21, 2011], Organized Trading [para 7, article 2 of Federal Law On Organized Trading № 325-FZ dated November 21, 2011], Provision of Information [para 4, article 2 of Federal Law On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation № 224-FZ dated July 27, 2010], Disclosure of Information [para 1, article 30 of Federal Law On Securities Market № 39-FZ dated April 22, 1996], Dissemination of Information [subpara 5, para 1, article 2 of Federal Law On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation № 224-FZ dated July 27, 2010], Financial Instrument [subpara 22, para 1, article 2 of Federal Law On Securities Market № 39-FZ dated April 22, 1996], Issuer [subpara 7, para 1, article 2 of Federal Law On Securities Market № 39-FZ dated April 22, 1996].*

### 2.4. TERMS FOR THE PURPOSES OF THIS DOCUMENT

- |                             |   |
|-----------------------------|---|
| ROSNEFT INSIDER             | – an individual and (or) a legal entity (including Group Subsidiaries) and (or) government authority and (or) a local self-government body having an access to the insider information of Rosneft under the law, by-law and (or) local standard acts, job position, delivery of labor functions, or on the basis of an independent contractor agreement concluded with Rosneft, and added into the List of Insiders of Rosneft. |
| ROSNEFT INSIDER INFORMATION | – accurate and specific information that has not been disseminated by Rosneft (including information representing commercial, service or other legally protected secret), dissemination of which can have a considerable impact on the prices of the financial instruments of Rosneft, and added to the List of information related to the insider information of Rosneft.  |
| NEWSWIRE                    | – a web resource updated in real time and provided by an  |

information agency qualified as an information distributor on the securities market.

#### TRANSACTIONS WITH FINANCIAL INSTRUMENTS

- entering into transactions or other actions focused on buying, selling, or other change of rights to the financial instruments, and also the actions related to incurrence of liabilities to perform the above actions including setting orders (issuing commissions) or cancellation of such.

#### ROSNEFT OFFICIAL WEBSITE

- a site in the Internet that contains information on Rosneft activity, represents a component of the Rosneft web resources being a set of technical, technological and organizational solutions which can be accessed via Internet network by domain names [www.rosneft.ru](http://www.rosneft.ru) / [www.rosneft.com](http://www.rosneft.com).

#### REGISTRAR

- a keeper of Rosneft's Shareholders Register who undertakes activities to keep the register of security holders based on the agreement made with Rosneft.

#### INTERNAL AUDIT SERVICE OF ROSNEFT

- a set of Rosneft structural units including the Operational Audit Department of Rosneft, Corporate Audit Department of Rosneft, Regional Audit Department of Rosneft, Economic and Organizational Analysis Division of Rosneft, Internal Audit Methodology and Organization Division of Rosneft, directly reporting to the Vice President – Head of Rosneft's Internal Audit.

#### ROSNEFT INSIDER LIST

- a confidential document of Rosneft containing the data on the insiders of Rosneft (including personal data of individuals) maintained by Rosneft on a permanent basis.

#### ACCESS TO ROSNEFT INSIDER INFORMATION

- an authorized direct access (including access against a delivery and acceptance certificate) of a person to the data qualifying as the Rosneft Insider Information and to material media (hard copies, electronic media, databases, information systems, information resources, computer networks, and other media) containing the Rosneft Insider Information.

## 2.5. ABBREVIATIONS

#### BANK OF RUSSIA

- Central Bank of the Russian Federation.

#### CFS

- consolidated financial statements.

#### CGD

- Corporate Governance Department.

#### IR

- information resource.

#### MIIMM

- misuse of Rosneft insider information and market manipulation, prevention of unlawful use of insider information of Rosneft and (or) market manipulation.

- 
- |              |   |
|--------------|---|
| OGRN         | – primary state registration number.                                |
| TAX ID (INN) | – taxpayer identification number.                                   |
| UCCII        | – a unified competence center for dealing with insider information. |

### 3. BUSINESS PROCESS PARTICIPANTS

3.1. Implementation of the requirements specified in this Standard shall involve:

- Chief Executive Officer;
- Vice President - Head of Internal Audit;
- Internal Control Group Protecting Insider Information Of Rosneft (Control Group) – a permanent working group of Rosneft established by the Chief Executive Officer of Rosneft for the Official to exercise internal control over the protection of insider information of Rosneft;
- CGD;
- Official – an official approved by the decision of Rosneft and accountable to the Chief Executive Officer of Rosneft, whose liabilities include the control of observance by Rosneft of Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" and the regulations of the Bank of Russia and Rosneft internal documents adopted in compliance therewith;
- UCCII – employees of the CGD who participate in information support on Rosneft insider information, as well as in interaction between Rosneft Insiders and Rosneft;
- Insider of Rosneft;
- Persons related to Rosneft Insiders - close relatives of persons specified in Clauses 7 and 13 of Article 4 of Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation", included in the Rosneft List of Insiders and Related Parties.



## 4. GENERAL PROVISIONS

### 4.1. THE "PREVENTION OF MIIMM" PROCESS

#### 4.1.1. "PREVENTION OF MIIMM" PROCESS GOALS AND TARGETS

4.1.1.1. Prevention of MIIMM is carried out by Rosneft in order to ensure lawful access and use of information related to Rosneft insider information.

4.1.1.2. In order to achieve this goal, the following tasks are performed:

- development of a list of information related to Rosneft insider information, based on the list of insider information of the Bank of Russia, as well as proposals of the ISU managers;
- organization of registering persons classified by Rosneft as insiders;
- compliance with Rosneft insider information rules;
- support of UCCII operation.

4.1.1.3. The main result of this process is the List of Rosneft Insiders, notifications on adding (removing) a person to (from) the List of Rosneft Insiders, the list of information related to Rosneft Insider Information, responses to requests of Rosneft Insiders.

#### 4.1.2. PRINCIPLES OF IMPLEMENTATION OF THE PROCESS OF "PREVENTION OF MIIMM"

4.1.2.1. Prevention of MIIMM is carried out in Rosneft in accordance with the following principles:

- Principle of adherence to ethical standards.

Organization of the process of ensuring access to Rosneft insider information, its safekeeping and protection shall be carried out in accordance with the Company Code № P3-01.06 P-01 Rosneft Code of Business and Corporate Ethics.

- Principle of Involvement.

Awareness of Rosneft employees and Insiders of their rights, obligations and restrictions, stipulated by Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" and this Standard.

- Principle of transparency.

Information on measures taken by Rosneft to prevent, detect and suppress MIIMM shall be published on the official website of Rosneft.

- Principle of Responsibility.

Personal responsibility of Rosneft employees for implementation of measures to prevent, detect and suppress MIIMM.

- Principle of Compliance.

Measures to ensure protection and safekeeping of Rosneft insider information, including prevention, detection and suppression of MIIMM correspond to the nature and scale of Rosneft activities.

- Principle of Prevention of Conflict of Interest.

Rosneft has taken sufficient and necessary measures to prevent and resolve conflicts of interest when handling Rosneft insider information.

4.1.2.2. Countering MIIMM shall be carried out with due care and reasonableness in order to exclude dissemination of information constituting insider information of Rosneft.

## **4.2. PROCESS "CONTROL OVER FULFILLMENT OF ROSNEFT OBLIGATIONS TO PREVENT, DETECT AND SUPPRESS MIIMM"**

### **4.2.1. GOAL AND OBJECTIVES OF THE PROCESS "CONTROL OVER THE FULFILLMENT OF ROSNEFT OBLIGATIONS TO PREVENT, DETECT AND SUPPRESS MIIMM"**

4.2.1.1. Control over execution of Rosneft responsibilities to prevent, detect and suppress MIIMM is carried out in accordance with the requirements of Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" to counter MIIMM.

4.2.1.2. In order to achieve this goal, the following tasks are performed:

- conducting audits of Rosneft compliance with MIIMM counteraction requirements;
- drawing up the results of the conducted audits of compliance with the MIIMM counteraction legislation, as well as providing information about them to the Chief Executive Officer and the Vice President - Head of the Internal Audit Service;
- preparing and submitting to the Chief Executive Officer a report on violations of the requirements of the Russian legislation in the field of counteraction to MIIMM, committed by ISU/employees;
- conducting annual training of employees to counter MIIMM.

4.2.1.3. The main results of this process are:

- quarterly reports on Rosneft compliance with the requirements in the area of counteraction to MIIMM;
- annual reports on violations of the requirements of the Russian legislation in the area of countering MIIMM, committed by SP/employees;
- proposals aimed at improving the ongoing measures to counter MIIMM;
- list of employees trained in countering MIIMM.

### **4.2.2. PRINCIPLES OF IMPLEMENTATION OF THE PROCESS "CONTROL OVER FULFILLMENT OF ROSNEFT OBLIGATIONS TO PREVENT, DETECT AND SUPPRESS MIIMM"**

4.2.2.1. Control over the fulfillment of Rosneft obligations to prevent, detect and suppress MIIMM shall be carried out by Rosneft in accordance with the following principles:

- Principle of continuous control and regular monitoring.

Regular monitoring of the effectiveness of implemented measures to prevent, detect and suppress MIIMM, as well as ongoing internal control over their implementation.

- Principle of control effectiveness.

Implementation of functions for exercising control over fulfillment of Rosneft obligations to prevent, detect and suppress MIIMM, which ensure the ease of their implementation and yield meaningful results.

- Principle of proportionality of control.

Development and implementation of functions to monitor the fulfillment of Rosneft responsibilities for the prevention, detection and suppression of MIIMM, allowing to reduce the likelihood of involvement of Rosneft, employees and Rosneft Insiders in activities related to MIIMM.

4.2.2.2. Activities to control the fulfillment of Rosneft responsibilities to prevent, detect and suppress MIIMM shall be performed in a timely manner and in accordance with the established deadlines in order to effectively organize processes aimed at managing the regulatory risk in the field of countering MIIMM (risk of Rosneft expenses (losses) and (or) other adverse effects

resulting from its noncompliance with requirements of Russian law on countering MIIMM, and (or) as a result of application measures taken by the Bank of Russia against Rosneft).

#### **4.3. RESPONSIBILITY FOR VIOLATION OF REQUIREMENTS OF THE FEDERAL LAW DATED 27.07.2010 №224-FZ "ON COUNTERING THE MISUSE OF INSIDER INFORMATION AND MARKET MANIPULATION AND AMENDING CERTAIN LAWS OF THE RUSSIAN FEDERATION"**

4.3.1. Rosneft Insiders, who are employees of Rosneft, shall be liable for MIIMM and may be brought to disciplinary, administrative, criminal or civil liability in accordance with the laws of the Russian Federation.

4.3.2. Rosneft Insiders, who are not employees of Rosneft, shall be liable for MIIMM and may be brought to administrative, criminal or civil liability in accordance with the laws of the Russian Federation and the terms of civil law contracts concluded with Rosneft.

4.3.3. Persons not included in the Rosneft List of Insiders, but who got an access to Rosneft Insider Information and distributed it or who performed transactions with financial instruments of Rosneft with the use of Rosneft Insider Information may also be subject to liability, except for cases stipulated by the laws of the Russian Federation and (or) regulatory legal acts in countering MIIMM.

4.3.4. Rosneft shall be entitled to demand compensation for losses from the persons guilty of unlawful use and (or) dissemination of the insider information.

## **5. REQUIREMENTS FOR IMPLEMENTATION OF THE "PREVENTION OF MIIMM" PROCESS**

### **5.1. DEVELOPMENT OF THE LIST OF INFORMATION CLASSIFIED AS INSIDER INFORMATION OF ROSNEFT**

#### **5.1.1. CRITERIA FOR CLASSIFYING INFORMATION AS INSIDER INFORMATION OF ROSNEFT**

5.1.1.1. The insider information of Rosneft includes:

- information from the list which is approved by the regulation of the Bank of Russia;
- Other information defined by Rosneft as insider information based on the provisions of Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" taking into account the specifics of Rosneft operations.

Rosneft Insider Information shall be subject to inclusion in Rosneft list of Rosneft Insider Information (list of information relating to Rosneft Insider Information), which shall be approved by Rosneft order.

The list of information related to the insider information of Rosneft is published on official website of Rosneft.

5.1.1.2. The following information does not refer to the insider information of Rosneft:

- information that has become available to an unlimited range of persons, also as a result of its distribution;
- research, forecasts and assessments with regard to the Rosneft financial instruments performed on the basis of the public information, as well as recommendations and (or) offers on performance of transactions in financial instruments of Rosneft;
- information and (or) data based thereon to be transferred by Rosneft and (or) by the person (persons) engaged by Rosneft to the potential acquirers, or used by Rosneft and (or) by the person (persons) engaged by Rosneft for giving recommendations or otherwise motivating the potential acquirers to acquire the Rosneft securities due to allocation (Allocation organization) and (or) offer (Offer organization) of equity securities of Rosneft in the Russian Federation or outside the Russian Federation, particularly, through placement of securities of a foreign issuer securing the rights in respect of the equity securities of Rosneft, provided that the potential acquirers are notified that such information (data) can be used by them exclusively for the purpose of making decision on acquisition of placed (offered) securities;
- information on entity which ensured security for the bonds of Rosneft, if such entity is the Russian Federation which has provided the state guarantee of the Russian Federation, a constituent entity (subject) of the Russian Federation which has provided the state guarantee of the constituent entity of the Russian Federation, and (or) the municipal unit which has provided the municipal guarantee for the bonds of Rosneft.

5.1.1.3. Information loses the status of insider information after its disclosure in accordance with Section 10 of this Standard.

#### **5.1.2. DISTRIBUTION OF RESPONSIBILITY AND AUTHORITY FOR COMPILING A LIST OF INFORMATION RELATED TO INSIDER INFORMATION OF ROSNEFT**

5.1.2.1. ISU responsible for developing and amending the list of information related to Rosneft insider information is the CGD.

5.1.2.2. ISU, whose functions include business processes related to creation and (or) use of Rosneft Insider Information, shall identify new types of Rosneft Insider Information, and shall timely submit proposals to the CGD for inclusion thereof in the list of information related to Rosneft Insider Information.

5.1.2.3. In order to include new types of insider information into the list of information related to Rosneft insider information, the CGD shall prepare an order of Rosneft.

## **5.2. ROSNEFT INSIDER LIST MAINTENANCE**

### **5.2.1. CRITERIA FOR CLASSIFYING PERSONS AS INSIDERS OF ROSNEFT**

5.2.1.1. Rosneft Insiders as an issuer of securities in accordance with the requirements of Part 2 of Article 9 of Federal Law dated 27.07.2010 №224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" shall include:

1. persons having access to the insider information of Rosneft on the basis of the contacts entered into with them, including:
  - auditors (audit organizations);
  - appraisers (legal entities with which the appraisers have entered into labor contracts);
  - professional participants of the securities market;
  - lending agencies;
  - insurance companies;
  - foreign insurance companies that have the right to perform insurance activities on the territory of the Russian Federation in accordance with the Law of the Russian Federation dated 27.11.1992 № 4015-1 "On Organization of Insurance Business in the Russian Federation".
2. Members of Rosneft Board of Directors, Management Board, Audit Commission, Chief Executive Officer.
3. Information agencies disclosing Rosneft information.
4. Persons responsible for assigning credit ratings to Rosneft and its securities.
5. Persons who have access to insider information on the basis of employment and (or) civil law contracts concluded with them:
  - Rosneft;
  - issuers of securities, which are admitted to trading on organized trading in the Russian Federation, and (or) in respect of which an application for admission to trading on such trading has been filed, in which Rosneft has the right to directly or indirectly (through persons under their control) control at least 25 percent of votes in the supreme governing body.

### **5.2.2. OBLIGATIONS OF ROSNEFT INSIDERS**

5.2.2.1. Insiders of Rosneft shall comply with:

- conditions of transactions with financial instruments of Rosneft;
- requirements to provide information on transactions with financial instruments of Rosneft carried out by them and their related persons;
- as well as other prohibitions and rules established by this Regulation, Federal Law dated 27.07.2010 №224-FZ "On prevention of unlawful use of insider information and market

manipulations and on modifying certain legal acts of the Russian Federation” and the Bank of Russia regulations adopted in accordance therewith.

5.2.2.2. Insiders of Rosneft must provide CGP with information on Rosneft securities belonging to them in the following order:

- members of the Rosneft Board of Directors, Rosneft Management Board, Rosneft Audit Commission, Chief Executive Officer of Rosneft shall communicate information within 7 (seven) business days of the date of election/appointment to the relevant governing or control authority of Rosneft;
- Individuals specified in Clause 5.2.1.1 (5) of this Standard - within 7 business days from the date of receipt of the Notice of inclusion into the Rosneft List of Insiders;
- the auditor (audit organization) shall communicate information within 7 (seven) business days of the date of his/her nomination as an auditor of Rosneft according to the procedure envisaged by the Rosneft Charter, and of the date of the contract with Rosneft;
- the registrar shall communicate information within 7 (seven) business days of the date of the contract with Rosneft for maintaining the security holder register of Rosneft;
- other legal entities having access to the insider information of Rosneft on the basis of the independent contractor agreement concluded therewith shall communicate information within 7 (seven) business days of the date of the corresponding contract with Rosneft.

### **5.2.3. REQUIREMENTS TO THE LIST OF ROSNEFT INSIDERS**

5.2.3.1. In order to take into account the persons attributed by Rosneft to its insiders, and also to comply with the requirements of Federal Law dated 27.07.2010 №224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" and the Bank of Russia regulations adopted in accordance therewith, the List of insiders of Rosneft is maintained on a regular basis.

The responsible ISU for maintaining Rosneft List of Insiders is the CGD.

5.2.3.2. The List of Insiders of Rosneft shall contain the following information:

1. Regarding Rosneft:
  - full and abbreviated company names;
  - category (categories) of the insider envisaged by Article 4 of Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation", to which Rosneft refers (with regard to each category, there shall be indicated the number of item under Article 4 of Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation", and a description of the insider category);
  - INN and OGRN;
  - registered address and mailing address;
  - official Rosneft website;
  - contact phone number, e-mail address for Rosneft Insiders;
  - last name, first name, patronymic, telephone number and e-mail address of the employee responsible for maintaining Rosneft List of Insiders.
2. Regarding insiders – legal entities:
  - full company name;
  - INN and OGRN;

- registered address and mailing address;
  - contact telephone number, e-mail address.
3. Regarding insiders – individuals:
- full name;
  - date and place of birth of the individual;
  - identification document details;
  - information about place of residence of the individual or the contact address;
  - contact telephone number, e-mail address.
4. Regarding the date and type of the event (inclusion (exclusion) in the List (from the List) of Rosneft insiders).
5. Regarding the grounds for inclusion (exclusion) of a person in (from) the List of Rosneft Insiders (if an insider is included in the List of Rosneft Insiders for more than one ground, all grounds shall be specified in the List of Rosneft Insiders):
- item number(s) of Article 4 of the Federal Law of 27.07.2010 № 224-FZ "On Combating Illegal Use of Insider Information and Market Manipulation and on Amendments to Certain Legislative Acts of the Russian Federation", in accordance with which the person was included (excluded) in (from) Rosneft Insider List;
  - description of a ground for adding (removal) of person to (from) the list of insiders of Rosneft;
  - in respect of the legal entity included (excluded) in the List (from the List) of Rosneft Insiders, the number of the contract in connection with the conclusion (termination) of which the relevant legal entity was included (excluded) in the List (from the List) of Rosneft Insiders.
6. Regarding financial instrument of Rosneft, to which the Rosneft Insider has an access.

5.2.3.3. Rosneft as a legal entity having the right to directly or indirectly (via its controlled entities) dispose of at least 25 percent of votes in the supreme governing body of securities issuers, which are admitted to organized trading in the Russian Federation, and (or) in respect of which an application for admission to trading at the specified trading is filed, shall perform the duties to maintain the list of insiders on the grounds specified in Clause 6 of Article 4 of Federal Law dated 27.07.2010 № 224-FZ "On Countering misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation".

5.2.3.4. Rosneft maintains one List of Rosneft Insiders on all grounds.

#### **5.2.4. DISTRIBUTION OF RESPONSIBILITIES AND AUTHORITIES AS PART OF MAINTAINING THE LIST OF INSIDERS OF ROSNEFT**

5.2.4.1. CGP shall transfer the List of Insiders of Rosneft to the trade organizer through which the transactions in financial instruments of Rosneft are performed, and/or the Bank of Russia upon request.

5.2.4.2. According to the procedure established by the regulatory acts of the Bank of Russia in the filed of countering the misuse of the insider information, and the Item 5.3. of these Regulations, CGP shall notify the persons added to the List of Insiders of Rosneft of their add to such list and of removal therefrom, and also notify the specified persons of the requirements of Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation".

5.2.4.3. When making an agreement with a legal entity that obtains access to the insider information of Rosneft based on the agreement, CGP shall inform the said entity of the



requirements of Federal Law dated 27.07.2010 №224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation", the Bank of Russia regulations adopted in accordance therewith, and on the responsibility for the misuse of insider information of Rosneft, and that it will be included in the List of insiders of Rosneft.

#### **5.2.5. PROCEDURE OF NOTIFICATION OF PERSONS ADDED TO (REMOVED FROM) THE LIST OF INSIDERS OF ROSNEFT**

5.2.5.1. The CGD shall notify the persons included in Rosneft Insiders List about their inclusion in and exclusion from such List, as well as about changes in the grounds for inclusion of the person in the said List.

5.2.5.2. The person shall be notified of his/her inclusion (exclusion) in the List (from the List) of Rosneft Insiders within a period not exceeding 7 working days from the date of inclusion (exclusion) of the person in the List (from the List) of Rosneft Insiders.

The person shall be notified of any changes in the grounds on which the person is included in the List of Insiders of Rosneft not later than 7 business days from the date of introduction of the relevant amendments to the List.

5.2.5.3. Notification of the person on inclusion (exclusion) in the List (from the List) of Rosneft Insiders shall be prepared in the form of [Appendix 1](#), [Appendix 2](#), [Appendix 3](#), [Appendix 4](#) to this Standard.

The person shall be notified of any changes in the grounds for inclusion in the Rosneft List of Insiders by sending a free-form notice, which shall necessarily contain an indication of all grounds for inclusion in the List.

5.2.5.4. Notification on inclusion (exclusion) in the List (from the List) of Rosneft Insiders may be prepared in hard copy and signed by an authorized person of Rosneft, or in the form of an electronic document signed by electronic signature of an authorized person of Rosneft.

5.2.5.5. CGD shall send to Rosneft Insiders (persons excluded from the List of Rosneft Insiders) Notices on inclusion (exclusion / change of grounds for inclusion in the List) into (from the List) of Rosneft Insiders:

- prepared as a hard copy in one of the following ways:
  - ♦ by sending registered mail with notification of receipt (other registered mail with notification of the sender of receipt to the addressee);
  - ♦ by submitting it to the courier service;
  - ♦ by sending an electronic image of the document from the corporate e-mail address [insiders@rosneft.ru](mailto:insiders@rosneft.ru) (except for notifications to legal entities);
  - ♦ иным способом, позволяющим подтвердить получение уведомления;
- drawn up as an electronic document by sending it from the corporate e-mail address [insiders@rosneft.ru](mailto:insiders@rosneft.ru).

5.2.5.6. If the Notice on exclusion from the Rosneft List of Insiders, sent to the last known address of the person being excluded, has not been received by such person, Rosneft shall take reasonable and affordable measures under the circumstances to establish the address of the person to which the Notice on exclusion from the Rosneft List of Insiders may be sent.

5.2.5.7. The person included in (excluded from) the List of the Insiders of Rosneft is entitled to request from Rosneft a copy of the Notification of add to (removal from) the List of Insiders of Rosneft, as well as all the notifications on changed grounds for adding the person to the List of



Insiders of Rosneft. In this case, the CGD shall, within 7 business days from the date of receipt of the person's request, provide such person with copies of the above documents (if available), and if not available with the CGD - information on the fact and date of its inclusion (exclusion) in (from the List) of Rosneft insiders, on changes in the grounds for inclusion in Rosneft Insiders List, in compliance with the requirements stipulated by Clause 5.2.5.5 of this Standard.

5.2.5.8. Rosneft shall promptly inform all persons included in Rosneft List of Insiders of any changes in its details, specified in Clause 5.2.3.2 (1) of this Standard, including by publishing a notice on its official website.

5.2.5.9. CGD shall keep records of all sent Notices on inclusion (exclusion/changing the grounds for inclusion in the List) in the List (from the List) of Rosneft insiders. Complete information about the sent Notices on inclusion (exclusion/changing the grounds, under which the person is included in the List) in the List (from the List) of Rosneft insiders shall be kept by Rosneft for at least 5 years from the date of exclusion of the person from the List of Rosneft insiders.

#### **5.2.6. THE UCCII OPERATION PROCEDURE**

5.2.6.1. To ensure the operation of the UCCII, the CGD director shall approve the principles for organizing the activities of the UCCII, comprising:

- a chart of the organization of UCCII activities;
- requirements for the organization of UCCII activities;
- peculiarities of organization of the corporate e-mail address insiders@rosneft.ru (a single channel of communication on the issues of Rosneft insider information);
- requirements to the content of the "Insiders" section on the official website of Rosneft and Rosneft IR.

## 6. TERMS AND CONDITIONS OF TRANSACTIONS WITH FINANCIAL INSTRUMENTS OF ROSNEFT INSIDERS AND RELATED PERSONS

6.1. Rosneft shall establish the periods of authorization and prohibition for Rosneft Insiders and related parties to perform transactions with Rosneft financial instruments.

6.2. For the purpose of eliminating the risk of recognizing a transaction with financial instruments of Rosneft as a MIIMM transaction, Rosneft has established the following conditions for transactions with financial instruments of Rosneft by Rosneft Insiders and associated persons:

6.2.1. Transactions with financial instruments of Rosneft shall be carried out during the authorization period defined as the period from the date following the date of disclosure of CFS prepared in accordance with the International Financial Reporting Standards (annual audited and interim unaudited, including summary) to the 29th calendar day of the first month of the quarter following the quarter in which the CFS was disclosed;

The forbidden period refers to:

- a period of 30 calendar days from the date of purchase of Rosneft financial instruments (for the sale of Rosneft financial instruments);
- a period starting from the 30th calendar day of the first month of the quarter through the date of CFS (including summary) disclosure for the previous quarter.

6.2.2. When Rosneft restricts the disclosure of financial statements (including summary) based on the regulatory legal acts of the Russian Federation, Insiders of Rosneft and related persons are prohibited from making any transactions with financial instruments of Rosneft in the following periods:

- from the 30th calendar day of the first month of the calendar year until the expiration of 120 calendar days after the end of the previous calendar year;
- from the 30th calendar day of the first month of the quarter until the expiration of 60 calendar days after the end of the quarter for which the CFS was not disclosed;
- during 30 calendar days from the date of the transaction by an Insider of Rosneft and (or) related persons with financial instruments of Rosneft in their own interests, during which the Insiders of Rosneft and related persons must refrain from performing contrary operations in relation to these transactions.

6.3. Transactions with financial instruments of Rosneft with the use of Rosneft Insider Information shall be forbidden.

The performance of transactions with financial instruments of Rosneft by Rosneft Insider and persons related to him during the forbidden period, as well as during the period from the date of creation of information by Rosneft Insider or the date when the Rosneft Insider became aware of the information related to the Rosneft Insider Information, until the date of disclosure of such information, indicates possible MIIMM by the Rosneft Insider and related persons in the course of such transaction.

The obligation to prove the fact of a transaction with financial instruments of Rosneft without MIIMM shall be placed upon the Rosneft Insider, including in respect of its related persons, who carried out such transaction during the forbidden period.

6.4. To avoid the risk of transactions with financial instruments of Rosneft during the forbidden period, Rosneft Insiders are recommended to contact the Corporate e-mail address of UCCII (insiders@rosneft.ru) for consultations with the CGD prior to the execution of the said transactions.

6.5. To ensure compliance with the ban on the use of Rosneft insider information, Rosneft Insiders specified in Clause 5.2.1.1 (2) of this Standard shall inform the CGD in writing of their and/or their related persons' intention to conduct transactions with Rosneft financial instruments prior to their execution. The recommended form of notification is given in [Appendix 5](#) to this Standard.

## 7. PROCEDURE FOR THE PROVISION BY INSIDERS OF ROSNEFT AND RELATED PERSONS OF INFORMATION ON EXECUTED TRANSACTIONS

7.1. Rosneft Insiders shall provide information on transactions with financial instruments of Rosneft performed by them and (or) their related persons in case of receipt of the CGD request containing the period for which the information is to be provided, including the information on:

- Rosneft securities transactions;
- entering into the contracts representing the derivative financial instruments which price depends on the securities of Rosneft.

7.2. The information on the transactions with financial instruments of Rosneft carried out by Rosneft Insider and its related parties shall be provided by Rosneft Insiders as part of the unified information in the format given in [Appendix 6](#), [Appendix 7](#) to this Standard.

7.3. Rosneft Insider shall provide information on the transactions with financial instruments of Rosneft made by the Insider and (or) the related persons to the CGD in the manner and timeframe specified in the request, taking into account the requirements established by the regulatory act of the Bank of Russia.

If during the requested period the Rosneft Insider and the related persons have not performed any transactions with financial instruments of Rosneft, the Rosneft Insider shall provide in the response to the request the information on the absence of the facts of performance of the specified transactions.

7.4. Information on the transactions with financial instruments of Rosneft performed by Rosneft Insider and the related persons shall be sent by Rosneft Insider to the CGD through the use of Rosneft information systems, through which Rosneft Insider received the relevant CGD request.

If there are circumstances that prevent the Insider from performing the request by the manner specified above, the Rosneft Insider shall provide information in hard copy to the CGD or by registered mail with return receipt request.

7.5. The information on the transactions with financial instruments of Rosneft performed by the insider and the related persons, provided in hard copy, shall be signed by the Rosneft Insider (authorized person of the Rosneft Insider), and if the Rosneft Insider is a legal entity - also sealed (if applicable).

The information on the transactions with financial instruments of Rosneft performed by the insider, sent by the Rosneft Insider - a foreign organization, may not be certified (sealed) with the seal of the foreign organization, if such certification (sealing) is not required in accordance with the foreign organization's law or constituent documents.

The information on the transactions with financial instruments of Rosneft performed by the insider and its related parties, which contains more than one sheet, shall be bound and the sheets of information shall be numbered. If the information on the transactions with financial instruments of Rosneft made by an insider is sent by a legal entity, the hard copy of the information shall be bound with the seal of such legal entity on the stitching and certified by the signature of an authorized person of such legal entity. If the information on the transactions with financial instruments of Rosneft performed by an insider is sent by an individual insider, each page of the hard copy shall be signed by such individual.

If the information on the transactions with financial instruments of Rosneft performed by the insider and the related persons on behalf of the Rosneft Insider is sent by its authorized representative, the

power of attorney (duly certified copy of the power of attorney) or other document (duly certified copy of the document), on which the representative's authority is based, shall be sent together with the information.

7.6. In order to prevent and counteract MIIMM in transactions with financial instruments of Rosneft, Rosneft Insiders specified in Clause 5.2.1.1 (2) of this Standard shall be obliged to send information on transactions with financial instruments of Rosneft performed by them and (or) their related persons to the CGD within 1 business day from the date of the transaction with financial instruments of Rosneft.

## 8. PROCEDURE FOR ACCESS TO INSIDER INFORMATION OF ROSNEFT

8.1. Access to Rosneft Insider Information shall be granted to persons included in the List of Rosneft Insiders in accordance with Clauses 5.2.1.1 of this Standard, requirements of Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" and regulatory acts of the Bank of Russia adopted in accordance with it.

8.2. Persons having access to Rosneft Insider Information shall comply with the restrictions and prohibitions stipulated by Clauses 9.3-9.5 of this Standard and Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation".

Any person not included in the Rosneft List of Insiders and not entitled to access the Rosneft Insider Information, but for any reason gained access to it, shall be obliged:

- comply with restrictions and prohibitions stipulated by Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation";
- immediately discontinue familiarization with such information;
- take comprehensive measures to maintain confidentiality of Rosneft insider information, including exclusion of distribution or provision of such information.

8.3. Rosneft, when granting the employee the right of access to Rosneft Insider Information, shall comply with the following procedure:

- make the employee aware against his/her signature of this Standard, as well as of the list of information related to the insider information of Rosneft;
- provide the employee with the Rosneft Insider Information Memo, containing the rights, obligations and restrictions in connection with inclusion into the Rosneft List of Insiders;
- create all necessary conditions for the employee to observe the confidentiality requirements regarding the insider information of Rosneft established by Rosneft;
- take other actions to ensure protection of confidentiality of Rosneft insider information.

## 9. PROCEDURE FOR THE USE OF INSIDER INFORMATION OF ROSNEFT

9.1. Rosneft Insiders shall be obliged to maintain confidentiality with respect to Rosneft Insider Information that has become known to them prior to its disclosure.

9.2. Rosneft Insider Information shall be used exclusively in the interests of Rosneft, to ensure production and business, financial and other activities of Rosneft, in accordance with the Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation", this Standard, on the basis of employment contracts and (or) job descriptions or civil law contracts concluded with counterparties.

9.3. Persons having access to Rosneft Insider Information, including Rosneft Insiders, shall not have the right to:

- disclose the known (leaked out) insider information of Rosneft;
- use Rosneft insider information for the purposes not related to their professional activities in Rosneft, performance of their job duties in Rosneft, and (or) for the purposes not stipulated by the terms of civil law contracts concluded with Rosneft;
- use Rosneft insider information in personal interests or in the interests of other persons;
- use Rosneft insider information for transactions with financial instruments of Rosneft;
- transfer Rosneft insider information to any other persons for the purpose of making transactions with financial instruments of Rosneft, as well as transfer to such persons any recommendations for making such transactions, based on Rosneft insider information.

9.4. The use of Rosneft Insider Information shall be prohibited for persons specified in Clause 9.3 of this Standard:

- by carrying out transactions with financial instruments of Rosneft, to which Rosneft Insider Information relates, at their own expense or at the expense of another person, except for the performance of transactions as part of the obligation to purchase or sell financial instruments of Rosneft, If such obligation has arisen as a result of a transaction with financial instruments of Rosneft, performed prior to the person becoming aware of Rosneft's insider information;
- by transfer of such information to another person, except when such information is transferred to a person included in the Rosneft List of Insiders in connection with performance of duties established by the Federal Laws, or in connection with performance of job duties or fulfillment of a contract;
- by giving recommendations to other parties, otherwise obliging or motivating them to purchase or sale of the financial instruments of Rosneft.

9.5. It is prohibited to perform actions related to market manipulation in accordance with the Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation".

9.6. The requirement to observe confidentiality of Rosneft Insider Information shall also apply to Rosneft Insiders who have ceased performance of their job duties in Rosneft or obligations under civil law contracts, on the basis of which they obtained access to Rosneft Insider Information, until the information obtained by such persons loses the status of Rosneft Insider Information.

9.7. Any use of Rosneft insider information carried out in violation of the requirements of this Standard, including the use of Rosneft insider information in the personal interests of the persons holding Rosneft insider information and other persons shall be unlawful and entail liability in accordance with Clause 4.3 of this Standard.

## 10. DISCLOSURE OF INSIDER INFORMATION OF ROSNEFT

10.1. The information included in the list of information pertaining to Rosneft Insider Information shall be subject to disclosure in accordance with the following procedure and terms:

- the insider information, approved by the regulatory act of the Bank of Russia, and included into the list of information related to the Rosneft Insider Information is subject to disclosure according to the procedure and within the timeframe set forth in the regulatory acts of the Bank of Russia;
- Rosneft insider information, not contained in the list of insider information approved by the Bank of Russia, and included in the list of information related to Rosneft insider information, shall be disclosed within the following terms from the date of the relevant fact (event, action) or the date on which Rosneft learned or should have learned of its occurrence:
  - ♦ in the news line - no later than the 1st calendar day;
  - ♦ on the web page in the Internet - no later than 2 calendar days;
  - ♦ if the deadline for disclosure falls on a non-working day, it shall be disclosed on the nearest working day following the non-working day.

10.2. If after disclosure or provision by Rosneft of its insider information, the information comprising the indicated information changes, such information shall be disclosed or provided to Rosneft in the same manner no later than the next business day after Rosneft became or should have become aware of such changes.

10.3. Information on Rosneft securities ownership provided by members of Rosneft Board of Directors, Management Board, Audit Commission, Chief Executive Officer in accordance with the procedure stipulated by Clauses 5.2.2.2, 7.6 of this Standard may be disclosed in Rosneft reporting documents.



## 11. CONFIDENTIALITY RULES FOR INSIDER INFORMATION OF ROSNEFT

11.1. Rosneft shall ensure the necessary organizational and technical conditions to comply with the confidentiality regime established by Rosneft, and shall also take necessary and sufficient measures aimed at protecting its insider information from unlawful use.

11.2. The confidentiality requirements regarding the insider information of Rosneft include the following measures:

- compilation of the list of information related to the insider information of Rosneft;
- restriction of access to the insider information of Rosneft, by establishing the procedure for use of this information and control over compliance with such procedure in accordance with this Standard;
- organization of accounting of persons, referred by Rosneft to its insiders, by maintaining the List of Rosneft Insiders;
- regulation of relations on use of Rosneft insider information in accordance with this Section of the Standard;
- implementation of the procedure for transfer of carriers containing Rosneft Insider information, and inclusion in the documents containing such information of an indication that Rosneft Insider Information is transferred, as defined in Clause 11.4 of this Standard.

The above measures are introduced for:

- protection of Rosneft insider information from illegal or accidental access, destruction, alteration, blocking, copying, provision, dissemination, and other illegal actions with Rosneft insider information;
- ensuring control over the activities of persons having access to Rosneft insider information on the basis of established restrictions on its use;
- ensuring compliance with the procedure for use of Rosneft insider information, including by eliminating the risk of its misuse by Rosneft insiders not in the interests of Rosneft;
- increase of the level of credibility to Rosneft on the part of its investors, shareholders, and contractors.

11.3. To protect confidentiality of Rosneft insider information, including unauthorized access, misuse or transfer to other persons of information related to Rosneft insider information, Rosneft shall develop and (or) apply the following measures:

- establishment of a permit regime to certain premises occupied by Rosneft (including on non-working holidays and weekends);
- use of Rosneft insider information carriers and the rules for circulation of such carriers, providing for the possibility of their transfer only to Rosneft insiders;
- timely destruction of information carriers (including draft documents and notes), which may contain insider information of Rosneft, that are not subject to storage;
- provision of access to Rosneft insider information to a limited number of persons included in the List of Rosneft insiders (including employees, who are direct executors, ensuring fulfillment of requirements of Federal Law dated 27.07.2010 № 224-FZ "On countering misuse of insider information and market manipulation, amending certain laws of the Russian Federation"), and only to the information necessary for performance of job duties by such persons within the limits of their authority, or rendering certain services on the basis of civil law contracts concluded with Rosneft;

- provision of right of access or restriction of access to Rosneft insider information to Rosneft employees - on the basis of job descriptions; to counterparties - on the basis of civil law contracts concluded with Rosneft;
- delineation of rights and obligations of employees, availability of a job description for the position occupied by the employee, which defines job duties and rights, taking into account the right of access to Rosneft's insider information;
- timely familiarization with this Standard under signature by all employees, as well as with the list of information related to Rosneft Insider Information;
- use of software and hardware means in Rosneft, preventing unauthorized access to the insider information, in accordance with the requirements of the LND, regulating the issues of information security of Rosneft confidential information;
- annual training of employees in accordance with the procedure established by the Official's decision, in order to verify employees knowledge of the norms of this Standard and awareness of the rules of handling Rosneft insider information and understanding of the consequences as a result of their violation;
- introduction of other measures aimed at restriction of access to Rosneft insider information, proposed by the Official, upon agreement with the Chief Executive Officer.

11.4. When transferring between employees of one ISU, to other ISU and outside Rosneft, the documents containing Rosneft Insider Information shall be specified in the cover letter (message) to the addressee that Rosneft Insider Information is being transferred.

Transfer of Rosneft Insider Information shall be carried out in electronic form via secure communication channels of Rosneft IR, which provide for the possibility of registration of:

- date and time of transmission of Rosneft insider information;
- information on the persons transmitting and receiving Rosneft insider information;
- content of transferred Rosneft Insider Information.

11.5. Identification of a document containing Rosneft Insider Information shall be carried out directly by the executor of such document upon agreement with the head of the ISU on the basis of the list of information related to Rosneft Insider Information.

11.6. The direct executor of the document shall be personally liable for his/her failure to comply with the confidentiality requirements to Rosneft insider information with respect to such information.

11.7. Any copy of the document with the Rosneft Insider Information shall refer to the Rosneft Insider Information.

11.8. If the document contains Rosneft insider information, only part of which has been duly disclosed, the confidentiality requirements shall apply to the Rosneft insider information, which has not been duly disclosed.

11.9. If a document, in addition to Rosneft insider information, also contains information relating to commercial secrets or to the "For Official Use" category, the document shall be assigned a confidentiality stamp and the requirements to protection of Rosneft confidential information shall be observed.

11.10. Handling the insider information of Rosneft shall be carried out as follows:

- in the premises separated from the workplaces of the employees who do not have access to Rosneft insider information. If it is impossible to separate the workplaces, the head of such ISU shall be personally responsible for protection and safety of Rosneft insider information;

- subject to restriction of access to copying machines, printers and similar devices used by the employees having access to Rosneft insider information;
- during negotiations, including negotiations with counterparties – Insiders of Rosneft, in separate premises ensuring exclusion of the possibility of unlawful disclosure of information on the fact and content of such negotiations, if there is a risk of unlawful use of Rosneft insider information.

Outside office hours, documents containing Rosneft insider information shall be kept in safes or lockable cases.

11.11. Employees shall immediately notify their immediate superior or his/her deputy about loss or shortage of documents, files containing Rosneft insider information, keys to safes, passes, passwords or about detection of unauthorized access to Rosneft insider information.

11.12. Rosneft insider information may be stored/processed in Rosneft information systems that meet the following requirements concurrently:

- intended for confidential information;
- fix the date and time of the document placement;
- establishing restrictions on access to persons who are not Rosneft insiders;
- ensuring delimitation of access rights for the employees, who enter Rosneft Insider Information, and employees, who carry out the subsequent processing of Rosneft Insider Information;
- fix the content of the placed document.

It is not allowed to place insider information of Rosneft on external media not registered with Rosneft.

11.13. Documents and other media, as well as electronic documents containing Rosneft insider information shall be handed over to counterparties, as well as to government and municipal authorities in compliance with Rosneft confidentiality requirements.

11.14. Upon termination of the employment contract, Rosneft insider employees shall, prior to the date of termination of the employment contract, hand over the carriers containing Rosneft insider information to the head of the ISU, to whom they are subordinate.

## **12. REQUIREMENTS FOR IMPLEMENTATION OF THE PROCESS "CONTROL OVER FULFILLMENT OF ROSNEFT OBLIGATIONS TO PREVENT, DETECT AND SUPPRESS MIIMM"**

12.1. Methods of control over fulfillment of Rosneft responsibilities for prevention, detection and suppression of MIIMM:

- inspection of job descriptions of Rosneft insider employees, coordination of access to Rosneft information systems and IR with Rosneft insider information, terms of provision and termination of access to Rosneft insider information;
- training and testing of employees for knowledge and content of the requirements of the legislation of the Russian Federation and LND in the field of countering MIIMM;
- control over compliance of ISU/employees with the requirements of the Russian Federation laws and LND in counteraction to MIIMM;
- timely communication to employees of new requirements of the legislation of the Russian Federation and LND in counteraction to MIIMM.

12.2. List of functions of the Official to control the fulfillment of Rosneft responsibilities to prevent, detect and suppress MIIMM:

12.2.1. Control over the following processes:

- Compilation by Rosneft of the list of information related to the insider information of Rosneft and keeping it up to date in accordance with the Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation", and Bank of Russia regulations adopted in accordance therewith;
- compliance with the procedure of access to Rosneft Insider Information and the rules for protection of its confidentiality established by this Standard;
- compliance with the procedure and terms for disclosure of Rosneft insider information in accordance with this Standard;
- ensuring compliance of the LNDs of Rosneft with the requirements in counteraction to MIIMM and compliance of the LNDs with each other;
- Rosneft shall make Rosneft management and employees aware of the requirements of the legislation of the Russian Federation and the LND in the field of counteraction to MIIMM;
- compliance by Rosneft Insiders and related persons with the terms of transactions with Rosneft financial instruments, established by this Standard;
- maintenance of the List of Rosneft Insiders;
- notification of persons on their inclusion (exclusion) in (from) the List of Rosneft Insiders;
- Transfer of the List of Rosneft Insiders to the trade operator, through which transactions with financial instruments of Rosneft are carried out, upon its request in the manner prescribed by the regulatory act of the Bank of Russia;
- submission of the List of Rosneft Insiders to the Bank of Russia at its request;
- submission of requests to the CGD for provision by Rosneft Insiders of information on transactions with financial instruments of Rosneft carried out by the Insiders and (or) related persons;
- submission of information on transactions with financial instruments of Rosneft by Rosneft Insiders and (or) related persons, including, upon request of the CGD, to the request of the trade operator.

12.2.2. Compiling and submitting to the Chief Executive Officer:

- proposals aimed at improvement of Rosneft measures to counter MIIMM;
- Reports on counteraction to MIIMM, including those containing information on the Official's activities.

12.2.3. Obligation to develop recommendations in counteraction to MIIMM to solve the tasks established by this Standard.

12.2.4. Participation in the revision process of this Standard.

12.2.5. Participation in reviewing requests, inquiries and applications in MIIMM counteraction, as well as analysis of relevant statistics (if available).

12.2.6. Obligation to inform the Chief Executive Officer of all cases impeding the performance of the functions of the Official.

12.3. In order to perform the functions of the Official aimed at controlling the fulfillment of Rosneft responsibilities to prevent, detect and suppress MIIMM, a Control Group shall be created. This group cannot include the following employees:

- those involved in implementation of the requirements of the Russian laws and regulations of the Bank of Russia in countering MIIMM (maintenance of the List of Rosneft Insiders, notification of persons on their inclusion (exclusion) in (from) the List of Rosneft Insiders, submission of the List of Rosneft Insiders to the Trade organizer and the Bank of Russia upon their request);
- of the Internal Audit Service.

The Vice President - Head of the Internal Audit Service cannot perform as an Official.

### **13. REQUIREMENTS FOR REPORTING ON THE PROCESS OF "CONTROL OVER FULFILLMENT OF ROSNEFT OBLIGATIONS TO PREVENT, DETECT AND SUPPRESS MIIMM"**

13.1. Based on results of control over fulfillment of Rosneft obligations to prevent, detect and suppress MIIMM, the following types of reports of the Official shall be prepared:

- a report in counteraction to MIIMM;
- a report on violations of the requirements of Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" and LND in the area of combating MIIMM, committed by ISU/employees;
- a report on proposals aimed at improving the ongoing measures to counter MIIMM.

13.2. A report on countering MIIMM shall be prepared on a quarterly basis by the Control Group. This report shall contain the following information:

- on the period of the report and on probable and (or) occurred regulatory risk events that took place during the reporting period;
- Indication of facts of observance or violation of requirements of Federal Law dated 27.07.2010 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" and this Standard;
- on the results of monitoring of activities of ISU, which carry out work with insider information of Rosneft;
- on activities of the Official and Control Group during the reporting period;
- in case of violations, information on the nature of violations, measures taken to address violations, as well as recommendations for preventing similar violations in the future shall be included.

The report of the Control Group shall be subject to approval by the Official not later than 1 calendar month after the end of the quarter, and shall be submitted to the Chief Executive Officer and the Vice President - Head of the Internal Audit Service not later than 1 business day after approval of the report.

13.3. The report on violations of requirements of Federal Law dated 27.07.2019 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" and LND in counteraction to MIIMM committed by ISU/employees shall be submitted to the Chief Executive Director annually within 90 calendar days after the end of the reporting year.

13.4. A report on proposals aimed at improving the ongoing measures to counter MIIMM shall be submitted to the Chief Executive Officer at least once a year.

The said report may be prepared by the Official as part of the reporting specified in Clauses 13.2 and 13.3 of this Standard.

## 14. REFERENCES

1. Federal Law dated 27.07.2010 № 224-FZ "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation".
2. Federal Law of the Russian Federation dated 27.11.1992 № 4015-1 "On the organization of insurance business in the Russian Federation".
3. Company Code № P3-01.06 P-01 Rosneft Code of Business and Corporate Ethics.

## 15. APPENDICES

**Table 1**  
**List of Appendices to the Rosneft Standard**

APPENDIX NUMBER	APPENDIX TITLE	NOTE
1	2	3
1	Form for individuals – notification of add of a person to the list of insiders of Rosneft	Included in this file
2	Form for legal entities – notification of add of a person to the list of insiders of Rosneft	Included in this file
3	Form for individuals – notification of removal of person from the list of insiders of Rosneft	Included in this file
4	Form for legal entities – notification of removal of person from the list of insiders of Rosneft	Included in this file
5	Form for the member of the management and control body of Rosneft and (or) related person - notification of the intention to conduct transactions with financial instruments of Rosneft	Included in this file
6	Form for individuals – information on transactions with financial instruments of Rosneft made by insider	Included in this file
7	Form for legal entities – information on transactions with financial instruments of Rosneft made by insider	Included in this file



## APPENDIX 1. FORM FOR INDIVIDUALS – NOTIFICATION OF ADD OF A PERSON TO THE LIST OF INSIDERS OF ROSNEFT

### NOTIFICATION of adding a person to the List of Insiders

<b>1</b>	<b>Notification information</b>	
1.1	Notification sequence number and preparation date	
<b>2</b>	<b>Information regarding the notifying person</b>	
2.1	Full legal name	Rosneft Oil Company
2.2	Actual or mailing address	Russian Federation, 115035 Moscow, 26/1 Sofiyskaya embankment
2.3	OGRN, INN	1027700043502 / 7706107510
2.4	Address (website) in the information network "Internet"	www.rosneft.ru
2.5	Contact phone number, e-mail address for insider requests	+7 (499) 517-8899, insiders@rosneft.ru
2.6	Item number of Article 4, Federal Law dated 27.07.2019 № 224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" (hereinafter referred to as Law № 224-FZ), which refers the notifying person to an insider	1
<b>3</b>	<b>Information about an insider who is a person</b>	
3.1	Surname, name and patronymic (if any)	
3.2	Date of Birth	
3.3	Place of birth (if known)	
3.4	Position held by the insider in the notifying entity (if any)	
3.5	Financial instrument	
3.6	Grounds for inclusion of the insider into the list	
3.7	Information on the insider's adding to the list and the date of adding	
<b>4</b>	<b>Information notice on the requirements of Law №224-FZ, stipulated by Clause 2 of Part 1 of Article 9</b>	
4.1	Please note that Law № 224-FZ sets restrictions on the use of insider information and (or) market manipulation (Article 6), the consequences of misuse of insider information and (or) market manipulation (Article 7) and the obligation to provide information on completed transactions (Article 10).	

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 (position of the authorized person of Rosneft)

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 (signature)  
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 (stamp)

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 (initials and surname)

## APPENDIX 2. FORM FOR LEGAL ENTITIES – NOTIFICATION OF ADD OF A PERSON TO THE LIST OF INSIDERS OF ROSNEFT

### NOTIFICATION of adding a person to the List of Insiders

<b>1</b>	<b>Notification information</b>	
1.1	Notification sequence number and preparation date	
<b>2</b>	<b>Information regarding the notifying person</b>	
2.1	Full legal name	Rosneft
2.2	Actual or mailing address	Russian Federation, 115035 Moscow, 26/1 Sofiyskaya embankment
2.3	OGRN, INN	
2.4	Address (website) in the information network "Internet"	www.rosneft.ru
2.5	Contact phone number, e-mail address for insider requests	+7 (499) 517-8899, insiders@rosneft.ru
2.6	Item number of Article 4, Federal Law dated 27.07.2010 №224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" (hereinafter referred to as Law №224-FZ), which refers the notifying person to an insider	1
<b>3</b>	<b>Information regarding an insider who is a Russian or Foreign Legal Entity</b>	
3.1	Full company name / title	
3.2	Location and/or mailing address (if any)	
3.3	OGRN, INN (if any)	
3.4	KIO (if any) and OCSM	
3.5	Registration number in the country of registration	
3.6	Financial instrument	
3.7	Grounds for adding the insider to the list	
3.8	Information on the insider's adding to the list and the date of adding	
<b>4</b>	<b>Information notice on the requirements of Law №224-FZ, stipulated by Clause 2 of Part 1 of Article 9</b>	
4.1	Please note that Law №224-FZ sets restrictions on the use of insider information and (or) market manipulation (Article 6), the consequences of misuse of insider information and (or) market manipulation (Article 7) and the obligation to provide information on completed transactions (Article 10).	

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 (position of the authorized person of Rosneft)

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 (initials and surname)

## APPENDIX 3. FORM FOR INDIVIDUALS – NOTIFICATION OF REMOVAL OF PERSON FROM THE LIST OF INSIDERS OF ROSNEFT

### NOTIFICATION on removal of person from the List of Insiders

<b>1</b>	<b>Notification information</b>	
1.1	Notification sequence number and preparation date	
<b>2</b>	<b>Information regarding the notifying person</b>	
2.1	Full legal name	Rosneft Oil Company
2.2	Actual or mailing address	Russian Federation, 115035 Moscow, 26/1 Sofiyskaya embankment
2.3	OGRN, INN	1027700043502, 7706107510
2.4	Address (website) in the information network "Internet"	www.rosneft.ru
2.5	Contact phone number, e-mail address for insider requests	+7 (499) 517-8899, insiders@rosneft.ru
2.6	Item number of Article 4, Federal Law dated 27.07.2010 №224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" (hereinafter referred to as Law №224-FZ), which refers the notifying person to an insider	1
<b>3</b>	<b>Information regarding a person excluded from the list of insiders</b>	
3.1	Surname, name and patronymic (if any)	
3.2	Date of Birth	
3.3	Place of birth (if known)	
3.4	Position held by the person removed from the list of insiders in the notifying entity (if available)	
3.5	Financial instrument	
3.6	Grounds on which the person excluded from the list of insiders has ceased to comply with provisions of Article 4 of Law №224-FZ	
3.7	Information on the exclusion of a person from the list of insiders and the date of such exclusion	
<b>4</b>	<b>Information notice on the requirements of Law № 224-FZ, stipulated by Clause 2 of Part 1 of Article 9</b>	
4.1	Please note that Law № 224-FZ sets restrictions on the use of insider information and (or) market manipulation (Article 6), the consequences of misuse of insider information and (or) market manipulation (Article 7)	

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 (position of the authorized person of Rosneft)

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 (initials and surname)

## APPENDIX 4. FORM FOR LEGAL ENTITIES – NOTIFICATION OF REMOVAL OF PERSON FROM THE LIST OF INSIDERS OF ROSNEFT

### NOTIFICATION on removal of person from the List of Insiders

<b>1</b>	<b>Notification information</b>	
1.1	Notification sequence number and preparation date	
<b>2</b>	<b>Information regarding the notifying person</b>	
2.1	Full legal name	Rosneft Oil Company
2.2	Actual or mailing address	Russian Federation, 115035 Moscow, 26/1 Sofiyskaya embankment
2.3	OGRN, INN	1027700043502, 7706107510
2.4	Address (website) in the information network "Internet"	www.rosneft.ru
2.5	Contact phone number, e-mail address for insider requests	+7 (499) 517-8899, insiders@rosneft.ru
2.6	Item number of Article 4, Federal Law dated 27.07.2010 №224-FZ "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" (hereinafter referred to as Law №224-FZ), which refers the notifying person to an insider	1
<b>3</b>	<b>Information regarding a Russian or foreign legal entity, removed from the list of insiders</b>	
3.1	Full company name / title	
3.2	Location and/or mailing address (if any)	
3.3	OGRN, INN (if any)	
3.4	KIO (if any) and OCSM	
3.5	Registration number in the country of registration	
3.6	Financial instrument	
3.7	Grounds on which the entity removed from the list of insiders has ceased to comply with the provisions of Article 4 of Law №224-FZ	
3.8	Information on the exclusion of the entity from the list of insiders and the date of such exclusion	
<b>4</b>	<b>Information notice on the requirements of Law №224-FZ, stipulated by Clause 2 of Part 1 of Article 9</b>	
4.1	Please note that Law № 224-FZ sets restrictions on the use of insider information and (or) market manipulation (Article 6), the consequences of misuse of insider information and (or) market manipulation (Article 7)	

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(position of the authorized person of Rosneft)

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(stamp)

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(initials and surname)

## APPENDIX 5. FORM FOR THE MEMBER OF THE MANAGEMENT AND CONTROL BODY OF ROSNEFT AND (OR) A PERSON RELATED TO IT - NOTIFICATION OF THE INTENTION TO CONDUCT TRANSACTIONS WITH FINANCIAL INSTRUMENTS OF ROSNEFT

### NOTIFICATION of intention to make transactions with financial instruments of Rosneft

(Recommended template)

<b>1</b>	<b>Information regarding the notifying person</b>	
1.1	Surname, name and patronymic (if any)	
1.2	Member of Rosneft management and control body	<input type="checkbox"/> Board of Directors <input type="checkbox"/> Management Board <input type="checkbox"/> Audit Commission
<b>2</b>	<b>Notification information</b>	
2.1	In accordance with the requirements of Rosneft Standard "Internal Control Rules for Prevention, Detection and Suppression of Illegal Use of Rosneft Insider Information and/or Market Manipulation", <b>I hereby notify you of my intention</b> to conduct a transaction with financial instruments of Rosneft	<input type="checkbox"/> In person <input type="checkbox"/> Related person Full name: Degree of relationship:
<b>3</b>	<b>Transaction details</b>	
3.1	Transaction (operation) type	
3.2	Type of securities	
3.3	Number of securities (to be specified for transactions with securities)	
3.4	Person(s) who are party(s) to a transaction, beneficiary(ies), intermediary and/or representative in a transaction	
3.5	Contract value	
3.6	Planned date of execution of the transaction	

\_\_\_\_\_  
(date)

\_\_\_\_\_  
(signature)

\_\_\_\_\_  
(printed full name)

## APPENDIX 6. FORM FOR INDIVIDUALS – INFORMATION ON TRANSACTIONS WITH FINANCIAL INSTRUMENTS OF ROSNEFT MADE BY INSIDER

### INFORMATION

of transactions with financial instruments of Rosneft made by Insider and (or) related persons

1 Surname, name and patronymic (if any) of the insider	
1.1. Surname, name and patronymic (if any) of the insider's related person	
2. Type and details of the insider identification document:	
2.1. Type and details of the insider's related person identification document*	
3. Insider's place of registration:	
3.1 Place of registration of a person related to the insider*	
4. Full brand name of the entity, for which the insider is included into the List of Insiders	Rosneft
5. Transaction date	
6. Transaction (operation) type	
7. Transaction (operation) amount	
8. Transaction venue (trade organizer or OTC market name)	
9. Type, category (form), series of a security (to be specified for transactions with securities)	
10. Full brand name of a security issuer (to be specified for transactions with securities)	
11. State registration number of a securities issue (to be specified for transactions with securities)	
12. Price of one security (to be specified for transactions with securities)	
13. Purchase and sales price per one security under repo agreements (for repo agreements)	
14. Number of securities (to be specified for transactions with securities)	
15. Type of derivative contract (to be specified for transactions with derivatives)	
16. Name (denomination) of derivative contract as accepted by the securities trade market arranger (to be specified for transactions with derivatives)	
17. Value of derivative contract (option premium amount) (to be specified for transactions with derivatives)	
18. Number of derivative contracts (to be specified for transactions with derivatives)	
19. Value of derivative contract settlement (to be specified for transactions with derivatives)	
20. Please indicate the requirement to confirm the receipt by Rosneft of the specified information about your transactions with financial instruments of Rosneft	

\_\_\_\_\_  
(date)

\_\_\_\_\_  
(signature)

\_\_\_\_\_  
(printed full name)

***Note\*** To be filled in when an insider provides information on transactions with financial instruments of Rosneft performed by a related party.*

## APPENDIX 7. FORM FOR LEGAL ENTITIES – INFORMATION ON TRANSACTIONS WITH FINANCIAL INSTRUMENTS OF ROSNEFT MADE BY INSIDER

### INFORMATION of transactions with financial instruments of Rosneft made by Insider

1. Full corporate name of the Insider	
2. OGRN, INN of the Insider	
3. Location of the Insider	
4. Full brand name of the entity, for which the insider is included into the List of Insiders	Rosneft
5. Transaction date	
6. Transaction (operation) type	
7. Transaction (operation) amount	
8. Transaction venue (trade organizer or OTC market name)	
9. Type, category (form), series of a security (to be specified for transactions with securities)	
10. Full brand name of a security issuer (to be specified for transactions with securities)	Rosneft
11. State registration number of a securities issue (to be specified for transactions with securities)	
12. Price of one security (to be specified for transactions with securities)	
13. Purchase and sales price per one security under repo agreements (for repo agreements)	
14. Number of securities (to be specified for transactions with securities)	
15. Type of derivative contract (to be specified for transactions with derivatives)	
16. Name (denomination) of derivative contract as accepted by the securities trade market arranger (to be specified for transactions with derivatives)	
17. Value of derivative contract (option premium amount) (to be specified for transactions with derivatives)	
18. Number of derivative contracts (to be specified for transactions with derivatives)	
19. Value of derivative contract settlement (to be specified for transactions with derivatives)	
20. Please indicate the requirement to confirm the receipt by Rosneft of the specified information about your transactions with financial instruments of Rosneft	

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 (date)

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 (signature)

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 (printed full name)