

# ROSNEFT INSIDER'S HANDBOOK



## INSIDER

- has access to insider information
- has been included in the List of insiders

## INSIDER IS OBLIGED TO

- comply with the procedure of performing transactions with financial instruments of Rosneft
- inform on transactions performed with financial instruments of Rosneft carried out by him or related persons on the Company's request
- comply with the legislative requirements and Rosneft's internal documents on insider information
- inform on holding Rosneft securities within 7 working days from the date of receipt of notice of inclusion in the List of Insiders
- notify about changing of personal data for the List of Insiders

## INSIDER IS PROHIBITED TO

- disclose the known insider information
- use insider information in personal purposes or in the interests of 3d parties
- transfer insider information to another person in purposes unrelated to performance of the duties established by the federal laws or work duties, contract performance
- recommend based on insider information 3d persons to perform transactions with Rosneft's financial instruments
- perform actions that constitute market manipulation
- perform transactions with financial instruments of Rosneft:
  - from the 30th calendar day of the 1st month of the quarter till the date of disclosure of consolidated financial statements (CFS), including summary, for the preceding quarter inclusive
  - within 30 calendar days from the day of purchase of financial instruments for the cases of their subsequent sale
- perform transactions with financial instruments of Rosneft (when restricting disclosure of CFS, including summary)
  - 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 and with financial instruments in their own interests, during which the Insiders must refrain from performing contrary operations in relation to these transactions.

## INSIDER INFORMATION

*(has simultaneously the following features)*

- is clear and concrete
- has not been disseminated (disclosed) by the Company earlier and dissemination (disclosure) may have a major impact on the value of Rosneft securities
- is contained in the List of Information related to Rosneft Insider Information

## INSIDER INFORMATION IS DISCLOSED ON

### LIST OF INFORMATION RELATED TO ROSNEFT INSIDER INFORMATION IS

- Rosneft website and on PRIME agency news feed (<https://disclosure.1prime.ru>)

- formed taking into account of the specifics of Rosneft operations
- including the list of information set forth by the Bank of Russia
- approved by Rosneft Order dated 23.12.2025 No. 503
- public information and published on official website of Rosneft in the section For Investors and Shareholders / Insiders

## INTERNAL DOCUMENT ON INSIDER INFORMATION

- Rosneft Standard No. P3-01 R-0049 UL-001 "Internal control rules for the prevention, detection and suppression of illegal use of insider information in Rosneft and (or) market manipulation"

## CONTACTS

- [insiders@rosneft.ru](mailto:insiders@rosneft.ru)