COMPANY INFORMATION POLICY

№ P3-01.04 P-01 UL-001

VERSION 3.00

MOSCOW
2017
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INTRODUCTORY PROVISIONS

APPOINTMENT

The policy establishes requirements to forming and maintenance of Rosneft single information policy, formats of external communications as well as:

- establishes the principles of Rosneft information exchange with shareholders, investors, mass media, stakeholders, etc;
- establishes single approaches in the sphere of such interaction, it is a basis of a system of operational management and reaction on:
  - the events capable to entail emergence of information/reputational risks;
  - emergency situations and incidents;
  - other significant events of the Company.

The policy is developed according to the Rosneft Charter, Rosneft Code of corporate governance № P3-01 KS-01, Rosneft Code of business and corporate ethics № P3-01.06 P-01.

SCOPE

This Policy is obligatory for execution by Rosneft employees of and Rosneft governing bodies members.

Rosneft policy implementation is provided with Rosneft executive bodies. Rosneft Board of directors (a committee of the Board of directors) exercises enforcement of this Policy.

Administrative, local regulating and other internal documents shall not contradict this Policy.

VALIDITY AND AMENDMENT PROCEDURE

The policy is the local regulating document of fixed action.

This Policy affirms, recognized become invalid, changes in Rosneft according to the decision of the Board of directors, and becomes effective by Rosneft order.

Initiators of amendment procedures of this Policy are: Rosneft Information and Advertising Department and also other structural divisions in coordination with Information and Advertising Department.

Changes are made to Policy in cases: changes of the Russian Federation legislation in the field of regulation of activities with mass media, informatizations and advertising, information disclosures in the security market, changes of an organizational structure or powers of heads, etc.
1. TERMS AND DEFINITIONS

TERMS AND DEFINITIONS FROM THE CORPORATE GLOSSARY

ACCOUNTING (FINANCIAL) RECORDS – information on a financial position of the economic agent on a reporting date, a financial result of its activities and cash flow for the accounting period systematized according to the requirements established by the legislation of the Russian Federation.

CONSOLIDATED FINANCIAL STATEMENTS – the systematized information reflecting a financial position, activities financial results and organization financial position change which is determined as group together with other organizations and (or) the foreign organizations according to International accounting standards [The federal law of 27.07.2010 № 208-FZ “About consolidated financial statements”].

Note: Corporate assets of mass information are implied as the newspaper, online edition, TV channel, radio station, the application for the smartphone for Rosneft employees (for Example, Neftyanoy kuryer), editions for Group Entity employees, the edition for Rosneft shareholders.

EMPLOYEE – the physical person, which joined labor relations with Rosneft or its Group Entity.

INFORMATION DISCLOSURE – ensuring availability of information with everything to the persons interested in it irrespective of the purposes of this information receipt according to the procedure guaranteeing its stay and obtaining.

INFORMATION POLICY – a complex of actions for information disclosure for the purpose of its bringing to shareholders, investors and other stakeholders in the amount necessary for acceptance of the weighed investment and management decisions or the making of other actions capable to influence financial and economic activities of the Company by them.

MASS MEDIA – the periodic printing edition, online media, TV channel, a radio channel, TV program, a radio program, the video program, the film chronicle program, other form of mass information periodic dissemination under the fixed name (name) [The act of the Russian Federation of 27.12.1991 № 2124-1 "About mass media”].

NEWSLINE – the information resource updated in real time and provided by the news agency having the information distributor status in the security market.

PRESS RELEASE – the official report prepared for mass media and the public about an event, an action or other essential information occasion.

ROSNEFT EXECUTIVE – the person occupying constantly or temporarily in Rosneft the position connected with the accomplishment of organizational and administrative or administrative functions, or performing such functions in Rosneft on special power.

ROSNEFT OFFICIAL WEBSITE – the website on the Internet containing information on Rosneft activities, being a component of information resources of Rosneft, Representing Set of Technical, Technology and Organizational Solutions, access to which is provided by means of Network, Internet on the domain names www.rosneft.ru/www.rosneft.com.
**STAKEHOLDERS** – partners and contracting parties of the Company, industry and all-Russian business communities, non-profit and public organizations, educational institutions and also the employees of the Company, the population and other persons interested in interaction with the Company or dependent in a varying degree from performed by the Company of activities in regions of presence, except for state governing bodies.
2. DESIGNATIONS AND ABBREVIATIONS

MD&A – the document "Analysis Management of a Financial Condition and the Company Activities Results" prepared by Rosneft Department of the consolidated statements and methodology and Rosneft activities results representation and published on the Rosneft official website.

MEDIA – mass media.

ROSNEFT EXECUTIVE BODIES – Rosneft Board, Chief executive officer.

ROSNEFT GOVERNING BODIES – Rosneft General Shareholder meeting, Rosneft Board of directors, Rosneft Board, Chief executive officer.

ROSNEFT TOP MANAGERS are Rosneft senior vice presidents, Rosneft vice-presidents, Rosneft Services vice-presidents are heads, state secretary – Rosneft vice-president, the chief geologist – Rosneft vice-president, Rosneft chief accountant, Rosneft finance director, Rosneft advisers and heads of structural divisions in the rank of vice-presidents, Rosneft press secretary.

THE COMPANY – legal entities group of various legal forms, including Rosneft concerning which the last acts directly or indirectly as the basic or the prevailing (participating) Company.
3. BASIC PRINCIPLES OF INFORMATION POLICY

The Rosneft information policy basic principles are:

- **regularity** – fixed and systematic representation to shareholders, investors, and stakeholders of information on Rosneft by use of all means of informing, available to Rosneft;
- **efficiency** – ensuring the shortest terms of informing shareholders, investors and stakeholders on the most essential events and the facts capable to influence Rosneft financial and economic activities and the shareholders infringing on interests, investors and (or) stakeholders and also ensuring rapid response (Rosneft line item representation) to the rumors or doubtful data creating Rosneft activities distorted idea and its securities cost;
- **availability** – using the various channels and methods of information dissemination on Rosneft providing free, easy and least costly access for shareholders, investors and stakeholders to disclosed information;
- **reliability** – representation to shareholders, investors and stakeholders of untrue information and also ensuring control from Rosneft of that information distributed by Rosneft wasn't distorted or wasn't wrong;
- **completeness** – submission of information sufficient for forming of the most complete idea of shareholders, investors and stakeholders of the valid situation on the issue interesting them;
- **balance** – providing a reasonable balance of openness and transparency by Rosneft, on the one hand, and confidentiality – with another, for the purpose of the maximum implementation and accounting of a shareholder right and interested persons on information receipt and Rosneft on the protection of commercially significant and other confidential information;
- **equality** – providing the equal rights and opportunities in information receipt for all shareholders according to the requirement of the Russian Federation legislation;
- **information security** – providing Rosneft of limited access confidential information protection according to the current legislation and the internal documents;
- **confidentiality** – ensuring careful attitude not only to corporate confidential information but also to partners confidential information, access to which Rosneft gets during the work with them;
- **objectivity and neutrality** - ensuring disclosure essential to shareholders, investors and stakeholders of information on Rosneft activities, irrespective of its influence on Rosneft activities and from the interests of any persons or their groups;
- **sequence** – ensuring information disclosure on Rosneft activities, unrepugnant (corresponding) to the data which are published by Rosneft earlier;
- **synchronism and equivalence** – ensuring disclosure of similar essential information on content on Rosneft activities both in the Russian Federation, and abroad.

Rosneft executive bodies take responsibility for information disclosure about Rosneft and its activities.

Information, which is subject to disclosure according to this Policy, shall reveal in Russian and can reveal in other languages.
4. PURPOSES AND TASKS OF INFORMATION POLICY

They direct Rosneft information policy to the achievement of the most complete implementation of shareholder rights, investors and stakeholders on information receipt, which is essential to investment acceptance and management decisions.

Rosneft information policy main purposes are:

- ensuring availability of Rosneft information to shareholders, investors and stakeholders;
- non-admission of disclosure of unreliable and/or incorrect information about activities;
- ensuring a high level of information transparency and corporate management;
- execution of the Russian Federation legislation requirements, Bank of Russia, Russian and foreign auctioneers, Company internal documents;
- ensuring qualified and high-quality interaction with the media members;
- risks prevention (including information, reputation, image), capable to cause damage to interests, to affect negatively the Rosneft securities price.
5. PUBLIC STATEMENTS ON BEHALF OF THE COMPANY

Possess the right of a public statement concerning the Company activities and submission of comments on behalf of the Company:

- Rosneft Chief executive officer.
- Rosneft Top managers on the Rosneft Chief executive officer specifying.
- Rosneft Press secretary.
- Authorized employees of Rosneft Information and Advertising Department in coordination with Rosneft Chief executive officer or Rosneft top managers.
- Other Rosneft officials on the Rosneft Chief executive officer specifying.

Rosneft chief executive officer, Rosneft press secretary, other Rosneft officials on specifying of the Rosneft Chief executive officer have an exclusive right of public statements implementation on the issues connected with Rosneft activities on carried out in the Russian Federation and abroad forums, conferences, meetings, seminars, at meetings of the ministries working bodies and departments, bodies executive and the Russian Federation legislature and territorial subjects of the Russian Federation, other public actions, to participate in press conferences, briefings, telephone and videoconferences, to give an interview, to make comments for the Russian and foreign media, finance and investment companies abroad, established by the Act of the Russian Federation of 21.07.1993 № 5485-1 "Concerning State Secrets" and the Federal law as of 29.07.2004 № 98-FZ "Concerning Commercial Secrets" and the Federal law as of 27.07.2006 № 149-FZ "About information, information technologies and on information security".

Information disclosure by Rosneft board members and officials is performed according to this Policy requirements and Rosneft internal documents and in the limits set by the current legislation of the Russian Federation and Rosneft internal documents on the state, commercial secret, other Rosneft protected information and also about information for office use.

Rosneft chairman of the directors board shall have the right to comment officially on the decisions made by the Rosneft Directors Board and also to state the point of view of the directors Board (within the telephone conferences, an interview, etc.) on the issues considered at meetings of the Rosneft Directors Board in the limits set by the current legislation and requirements of internal documents about the state, Rosneft commercial secret and also about information for office use.

Rosneft board members have the right to state publicly the personal point of view on the issues considered at meetings of the Rosneft Directors Board and also according to the decisions made at a meeting of the Directors Board taking into account the restrictions provided by Rosneft internal documents and the current legislation on the state, commercial secret and also on information for office use.

Rosneft Directors Board committees Chairpersons shall have the right to comment and inform stakeholders on the decisions made on committee meetings taking into account the restrictions provided by Rosneft internal documents and the current legislation on the state, commercial secret and also on information for office use.

Rosneft Directors Board committees Members shall have the right to state publicly the personal point of view on the issues considered at meetings of the relevant committee and also according to
the decisions made by committee taking into account the restrictions provided by Rosneft internal documents and the current legislation on the state, commercial secret and also on information for office use.
6. INFORMATION DISCLOSURE

Rosneft timely and properly performs requirements of the current legislation, trade organizers regulators in the field of obligatory information disclosure, providing activities transparency for shareholders, investors and stakeholders.

Rosneft avoids formalistic approach in case of information disclosure and opens essential information on the activities even if disclosure of such information isn't stipulated by the legislation, but in the limits set by the current Russian Federation legislation and internal documents of the Company in the field of regulation of work with the documents containing the state, commercial secret and also information for office use.

6.1. OBLIGATORY DISCLOSURE OF INFORMATION

Rosneft performs disclosure by the provided current legislation, requirements and trade organizers regulators of the following information types in the forms established by the above-stated requirements:

- Rosneft charter and internal documents regulating activities of Rosneft governing bodies;
- information connected with holding general meetings of Rosneft shareholders;
- Rosneft annual report;
- the report in the field of Rosneft sustainable development;
- Rosneft annual accounting (financial) accounts for the last complete accounting year with the application of an audit opinion concerning such reporting;
- Rosneft intermediate accounting (financial) records for the complete accounting period consisting of three, six or nine months of accounting year;
- Rosneft annual consolidated financial statements for the last complete accounting year with the application of an audit opinion concerning such reporting;
- Rosneft intermediate consolidated financial statements for the complete accounting period consisting of three, six or nine months of accounting year;
- quarterly reports of the issuer of emission securities;
- prospectus;
- messages on essential facts;
- data which can have a significant effect on the Rosneft securities cost;
- Rosneft affiliates list;
- information on Rosneft dividend policy, which is regulated by Rosneft Dividend policy № P3-01.05 P-01 UL-001;
- information and documents opened at stages of the Rosneft securities issue procedure;
- insider information, except for information:
  - about the decisions accepted by the Rosneft directors Board on the issues which are within its competence according to the Rosneft Charter if such information belongs to its
confidential information (except for information on the decisions accepted by the Rosneft directors Board on the issues which are within its competence according to federal laws);

- about terms of the contract about maintenance (stabilization) of Rosneft securities emission prices (the securities of the foreign issuer certificating the rights concerning emission securities of Rosneft), except for the specified agreement validity period.

- additional data provided by regulations of the Bank of Russia;
- other forms, stipulated by the legislation.

Information disclosure in the security market is regulated by the current legislation and other regulations, the Rosneft Charter and also Provision of the Company "Information disclosure in the security market" № P3-01.05 P-0028.

6.2. INFORMATION DISCLOSURE ON THE INITIATIVE OF ROSNEFT

Rosneft performs essential information disclosure on the activities (documents) even if such information disclosure (documents) or disclosure in such form isn't provided by the requirements specified in item 6.1 of this Policy, but in the limits set by the Russian Federation current legislation and Rosneft internal documents on the state, commercial secret and also on information for office use.

Rosneft reveals the following information:

- about Rosneft strategy, the prospects of development, corporate values and tasks;
- about the Rosneft main activities;
- about Rosneft key operational and financial performance;
- about Rosneft financial activities and a financial condition, including explanations of Rosneft executive bodies to annual and Rosneft interim financial statements, financial analysis and its activities results (MD&A), including the analysis of profitability, financial stability indicators, assessment of changes in structure and structure of assets and liabilities, assessment of the current and perspective liquidity of assets, the description of the factors exerting impact on Rosneft financial condition, and tendencies which can exert impact on activities further;
- about Rosneft essential events, transactions (projects) and the legal entities under control to it who are mentioning financial and economic activities and/or having for it essential value;
- about Rosneft operational structure;
- about Rosneft capital structure;
- about Rosneft organization and the corporate management general principles;
- about Rosneft executive bodies with an indication of their structure, the collegiate executive body chairman and his deputy, bio data of executive bodies members (including data on their age, education, qualification, experience), data on positions which they hold in other legal entities;
- about the Rosneft directors Board structure with indication of the chairman, his deputies, bio data of board members (including data on their age, education, a place of employment now, qualification, experience), specifying on when each director was for the first time elected as a member of the Rosneft directors Board, information on whether they are independent directors;
- about the structure of the Rosneft directors Board committees with an indication of the chairman and independent directors as a part of the Rosneft directors Board committees;
- about the Rosneft directors Board activities and the directors Board committees with indication of Council of directors/committees of the directors Board holding meetings statistics, Rosneft board members participation in Council of directors/committees of the Rosneft directors Board meetings, the considered issues;
- about the Rosneft board members remuneration;
- about ownership of board members and Governments of shares;
- about the Rosneft policy in the social and ecological sphere and also in the sphere of industrial safety and labor protection;
- about the Rosneft innovative development;
- about the Rosneft policy in the sphere of counteraction to a corporate fraud and corruption;
- other essential information, according to Rosneft Oil Company.

The documents regulating the main issues of Rosneft activities are represented on the Rosneft official website.

The regulations on Rosneft General Shareholder meeting provided the list of the additional information, which can be provided to shareholders within preparation for Rosneft General Shareholder meeting, in addition to the obligatory information provided by the Russian Federation current legislation.

### 6.3. DISCLOSURE INFORMATION METHODS

Rosneft information disclosure (documents) is performed by dissemination of information by the following methods:
- placement in media, including in a newline;
- placement on the Internet on the Rosneft official website and on the website of the distributor of information in the security market – news agency which is in accordance with the established procedure authorized in carrying out actions for information disclosure in the security market;
- printing editions;
- providing to shareholders of access to information (documents) and representation according to their requirement of documents copies in cases and an order, stipulated by the legislation the Russian Federation and Rosneft internal documents;
- publication in brochures, booklets and other printing editions;
- holding press conferences, briefings, meetings with shareholders, investors and stakeholders and other actions;
- other methods.
6.3.1. PLACING INFORMATION IN ELECTRONIC MASS MEDIA AND FEDERAL INFORMATION RESOURCES

Rosneft performs placement of press releases, messages and other information in media according to requirements of local regulating documents as required of such placement.

Rosneft performs placement of messages in electronic media and federal information resources, including about essential facts (events, actions) affecting Rosneft financial and economic activities, and data which can have significant effect on the cost of Rosneft securities and also other information, an obligation to open which arises at Rosneft according to the Federal Law as of 22.04.1996 № 39-FZ Concerning the Securities Market, the Federal Law 26.12.1995 № 208-FZ About Joint-Stock Companies, the Federal Law as of 27.07.2010 № 224-FZ About counteraction to unauthorized use of insider information and to a market manipulation and about modification of separate legal acts of the Russian Federation, the federal law as of 08.08.2001 № 129-FZ "About the state registration of legal entities and individual entrepreneurs", Regulations on disclosure of information by issuers of emission securities № 454-P and other regulations of the Bank of Russia.

If Rosneft securities are admitted to trading by the organizer of trade in the security market, along with publication of information in a Rosneft newsline or the person authorized by it notifies the organizer of trade in the security market on contents of such information in the order approved with the organizer of trade in the security market.

In case according to Regulations on disclosure of information by issuers of emission securities № 454-P information is opened by publication in a newsline, until Rosneft information disclosure by publication in a newsline disclosure of such information in other ways isn't allowed. Such information isn't public and its unauthorized use attracts responsibility in accordance with the legislation of the Russian Federation.

6.3.2. PLACING INFORMATION ON THE INTERNET

Rosneft performs placement of press releases, messages, articles, an interview, promotional materials and other public information on the Rosneft official website.

Messages, including on essential facts (events, actions) affecting Rosneft financial and economic activities, and the data which can have significant effect on the cost of securities of Rosneft and also other information, obligation to open which arises at Rosneft in accordance with the legislation of the Russian Federation, are published on the Internet and on the website of the information distributor in the security market – news agency which is in accordance with the established procedure authorized on carrying out actions for information disclosure in the security market in the terms established by the Russian Federation legislation. Rosneft provides an open entry to information, which Rosneft is obliged to open in accordance with the legislation of the Russian Federation, the Rosneft Charter and local regulating documents on the Internet.

The data provided in this point are posted on the Rosneft official website and shall be in continuous access during all term provided by the Russian Federation current legislation:

- Rosneft charter with the amendments and (or) additions;
- the internal documents regulating activities of Rosneft governing bodies with the amendments and (or) additions;
- Rosneft information on members of governing bodies;
- Rosneft annual accounting (financial) accounts for the last complete accounting year with the application of an audit opinion concerning such reporting;
- Rosneft intermediate accounting (financial) records for the complete accounting period consisting of three, six or nine months of accounting year;
- Rosneft annual consolidated financial statements for the last complete accounting year with the application of an audit opinion concerning such reporting;
- Rosneft intermediate consolidated financial statements for the complete accounting period consisting of three, six or nine months of accounting year;
- prospectus;
- quarterly reports of the issuer of emission securities;
- information about essential facts;
- Rosneft information on the strategy, projects of development and reforming;
- Rosneft dividend policy;
- announcements of the tendering process;
- Rosneft list of affiliates;
- Rosneft regulations on branches and representative offices;
- Present Policy;
- Code of business and corporate ethics of Rosneft № P3-01.06 P-01;
- the list of media in which information on Rosneft is published;
- other documents (materials), stipulated by the legislation Russian Federation, separate board decisions and Rosneft Board of directors and/or Rosneft internal documents;
- the list of data relating to insider information;
- information (materials) provided to the persons having the participation right in Rosneft General shareholder meeting – for the term of such provision if other isn't provided by this Policy.

6.3.3. PUBLICATION OF INFORMATION IN PRINTING EDITIONS

Rosneft performs the publication of press releases, messages, articles, an interview, promotional materials, the presentations about activities and other information in the printing editions distributed in the territory of the Russian Federation and also abroad as required such publication.

6.3.4. INFORMATION (DOCUMENTS) GRANTING ACCESS TO SHAREHOLDERS AND ISSUE THEM COPIES OF DOCUMENTS ACCORDING TO THEIR REQUIREMENT IN CASES, STIPULATED BY THE LEGISLATION OF THE RUSSIAN FEDERATION

The shareholder right on access to Rosneft documents shall be performed according to the rights and legitimate interests, both shareholders, and Rosneft as an independent subject of the civil circulation interested in preserving the confidentiality of information, commercially significant for it.

Actions of the shareholder, which can be qualified as an abuse of the right, are not allowed. In the of the shareholder (shareholders), owning less than 25% of shares of Rosneft about the provision of access to Rosneft documents and information the business purpose with which documents are requested shall be specified.

The order and terms of presentation and execution of the shareholder requirement about access to the documents of Rosneft including containing confidential information on Rosneft activities and production of their copies is established in Rosneft internal documents taking into account the provisions established by the current legislation and Rosneft internal documents on the state, commercial secret and also on information for office use.

6.3.5. **OTHER METHODS OF INFORMATION DISCLOSURE**

Rosneft performs the publication of information on Rosneft and its activities of promotional materials and other information in brochures, booklets and other printing editions as required of such publication.

Rosneft as required will organize holding the press conferences devoted to important events which take place or will happen in Rosneft, on a regular basis holds meetings with shareholders (shareholders representatives), investors and equity analysts, representatives of public authorities, including in case of obtaining from specified persons of the corresponding request in writing.

Rosneft aims to participate in work of the Russian and international conferences and symposiums.
7. ROSNEFT CONFIDENTIAL AND INSIDER INFORMATION SECURITY

Rosneft performs protection of confidential and insider information in the order provided by the Federal Law Concerning State Secrets, the Federal law as of 29.07.2004 № 98-FЗ "About commercial secret", local regulating documents in the field of confidential data protection and insider information.
8. REFERENCES


2. The federal law as of 22.04.1996 № 39-FZ "About the security market".

3. The federal law as of 29.07.2004 № 98-FZ "About commercial secret".

4. The federal law as of 27.07.2006 № 149-FZ "About information, information technologies and information security".

5. The federal law as of 27.07.2010 № 224-FZ "About counteraction to unauthorized use of insider information and to a market manipulation and about modification of separate legal acts of the Russian Federation".

6. The federal law as of 08.08.2001 № 129-FZ "About the state registration of legal entities and individual entrepreneurs".


8. The act of the Russian Federation as of 21.07.1993 № 5485-1 "Concerning State secret".

9. The regulations on information disclosure by issuers of emission securities approved by the Bank of Russia as of 30.12.2014 № 454-P.


11. The Rosneft code of corporate governance № P3-01 KS-01 version 1.00 approved by the decision of the Rosneft directors Board as of 11.06.2015 (the protocol as of 15.06.2015 № 36).

12. The Rosneft code of business and corporate ethics № P3-01.06 P-01 version 1.00 approved by the decision of the Rosneft Board of directors 05.06.2015 (the protocol as of 05.06.2015 № 35), which is put into effect by the Rosneft order as of 28.09.2015 № 428.

13. Rosneft dividend policy № P3-01.05 P-01 of UL-001 version 1.00 approved by the decision of the Rosneft directors Board as of 05.06.2015 (the protocol as of 05.06.2015 № 35), Rosneft which is put into effect by the order as of 13.11.2015 № 517.

14. Regulations on Rosneft Oil Company General meeting of shareholders, approved by the decision of Rosneft Oil Company General shareholders meeting as of 27.06.2014.

15. Provision of the Company "Information Disclosure in the Security Market" № P3-01.05 P-0028 version 2.00, Rosneft approved by the order as of 05.12.2016 № 709.
## 9. REGISTRATION OF CHANGES OF THE LOCAL REGULATING DOCUMENT

<table>
<thead>
<tr>
<th>VERSION</th>
<th>TYPE AND NAME OF THE DOCUMENT</th>
<th>DOCUMENT №</th>
<th>APPROVAL DATE</th>
<th>VALIDITY DATE</th>
<th>REQUISITES</th>
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<td>17.05.2006</td>
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