

APPROVED

**by Decision of Rosneft's Board of Directors
dated March "20", 2014**

Minutes № 28 dated March "20", 2014

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by Order № 208 dated April "21", 2014

POLICY OF THE COMPANY

IN THE AREA OF ENHANCEMENT OF ENERGY EFFICIENCY AND ENERGY SAVING

№ P2-04.02 P-01

VERSION 1 AMEND. 2

**MOSCOW
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INTRODUCTORY PROVISIONS

INTRODUCTION

The Company's Policy in the area of enhancement of energy efficiency and energy saving (hereinafter - the "Policy") is a fundamental document for introduction and operation of the Energy Management System in the Company and determines general principles of activities, aimed at enhancement of energy efficiency and energy saving.

This Policy was elaborated in accordance with basic methodological approaches, principles, regulations and requirements of GOST R ISO 50001 "Energy Management Systems. Requirements with guidance for use" and ISO 50001 "Energy management systems - Requirements with guidance for use".

OBJECTIVES

The Policy expresses the Company's position in the area of enhancement of energy efficiency and energy saving and formalizes unified principles and approaches in this area.

TASKS

Primary tasks of the Policy are:

- Identification of the Company's objectives and tasks as well as principles for activities in the area of energy efficiency and energy saving;
- Determination of the system for management of activities aimed at enhancement of energy efficiency and energy saving (including management objects, management levels, distribution of responsibility and powers);
- Determination of the structure and hierarchy of local regulatory documents governing activities in the area of energy efficiency and energy saving.

AREA OF APPLICATION

This Policy is binding for all employees of Rosneft and Rosneft Group Subsidiaries, operations of which are directly or indirectly connected with utilization of energy resources, enhancement of energy efficiency and energy saving.

This Policy bears recommendatory nature for employees of Rosneft's affiliates.

Requirements of this Policy will be subject to compulsory implementation in subsidiaries and affiliates of Rosneft, as well as in any other Entity, in which Rosneft participates directly or indirectly, after they are validated in an Entity in accordance with its Charter and in the procedure established in it.

Order, local regulatory documents and other internal documents shall not conflict with this Policy.

EFFECTIVE PERIOD AND AMENDMENT PROCEDURE

This Policy is a permanent local regulatory document.

This Policy shall be deemed null and void in Rosneft on the basis of the Resolution of the Rosneft Board of Directors.

Changes to this Policy shall be introduced following Rosneft Management Board resolution and are brought into force in Rosneft by a Rosneft order.

1. TERMS AND DEFINITIONS

TERMS OF THE CORPORATE GLOSSARY

This Policy uses the terms of the Corporate Glossary: *Group Subsidiary (GS)*, *Energy Saving Program*, *Independent Structural Unit (ISU)*.

ROLES OF THE CORPORATE GLOSSARY

This Policy uses the roles of the Corporate Glossary: *Senior Management*, *Rosneft Energy Efficiency Commission*, *Division for Energy Efficiency and Energy Saving*, *Working Group for Energy Efficiency*.

TERMS FROM EXTERNAL DOCUMENTS

This Policy uses the terms of the following external documents: *Energy Management System [clause 3.9 of GOST R ISO 50001-2012]*, *Energy Performance [clause 3.12 of GOST R ISO 50001-2012]*, *Energy Efficiency [clause 4 Art. 2 of Federal Law dated 23.11.2009 № 261-FZ “On Energy Saving and Energy Efficiency Improvements and Amendments to Certain Legislative Acts of the Russian Federation”]*, *Energy Resource [clause 1 Art. 2 of Federal Law dated 23.11.2009 № 261-FZ “On Energy Saving and Energy Efficiency Improvements and Amendments to Certain Legislative Acts of the Russian Federation”]*, *Energy Survey [clause 7 Art. 2 of Federal Law dated 23.11.2009 № 261-FZ “On Energy Saving and Energy Efficiency Improvements and Amendments to Certain Legislative Acts of the Russian Federation”]*, *Energy [clause 3.5 of GOST R ISO 50001-2012]*, *Energy Saving [clause 3 Art. 2 of Federal Law dated 23.11.2009 № 261-FZ “On Energy Saving and Energy Efficiency Improvements and Amendments to Certain Legislative Acts of the Russian Federation”]*.

TERMS USED FOR THE PURPOSES OF THIS DOCUMENT

BUSINESS BLOCK – a set of independent structural units of Rosneft, immediately subordinated to the Top Manager, responsible for a business area; Entities of Rosneft Group and / or independent structural units of Entities of Rosneft Group, carrying out their activities in a business area.

BUSINESS AREA OF ACTIVITIES – a set of interrelated and interacting business processes and their results, which are combined by particular signs (achievement of particular results of business activity, utilization of resources, geographic sign, etc.) for the purpose to enhance effectiveness of activities in accordance with decisions on the Company’s development.

BUSINESS / FUNCTIONAL SEGMENT – a set of areas of the Company’s activities, which are homogeneously grouped.

AUDIT OF ENERGY EFFICIENCY – a systematic, independent and documented process for obtainment of evidences and their objective assessment for determination of a degree of fulfillment of established requirements.

INDEX (INDICATOR) OF ENERGY EFFICIENCY (INDICATOR OF ENERGY RESULTS) – a quantitative value or a measure of energy efficiency, determined by Rosneft / Entity of Rosneft Group.

Note: Indicators of energy results may be expressed in simple metric units, proportions or more complicated models (p.3.13 of GOST R ISO 50001).

REPRESENTATIVE OF SENIOR MANAGEMENT IN ENERGY MANAGEMENT SYSTEM - an office holder, appointed by the Senior Management (the Rosneft Chief Executive Officer, Director of an Entity of Rosneft Group), vested with required powers and responsible for provision of operation of the Energy Management System in accordance with requirements of GOST R ISO 50001 and ISO 50001.

Note: A representative of the senior management in the Energy Management System of an Entity of Rosneft Group, is also a manager of the Working Group for energy efficiency of an Entity of Rosneft Group.

PRODUCTION ASSETS – a set of production units, ensuring a complex nature of management of production, transportation, processing and sale of hydrocarbon material.

PRODUCTION UNITS - technological complexes, individual objects, ensuring production, transportation, processing and sale of hydrocarbon material.

TOP MANAGER – Rosneft senior executive responsible for the efficient performance and strategic development of the supervised business area and (or) business process of the Company and any manager holding a position equivalent to his/her position by virtue of the decision of the Rosneft Chief Executive Officer: Vice President, Company Official in the rank of Vice President, Chief Accountant, Head of Service directly reporting to the Rosneft Chief Executive Body, and Press Secretary.

2. SYMBOLS AND ABBREVIATIONS

SENIOR MANAGEMENT OF ENTITY OF ROSNEFT GROUP (MANAGERS OF ERG) – managers of Entities of Rosneft Group and their deputies by areas of activities of an Entity of Rosneft Group.

COMPANY – a group of legal entities of various corporate forms, including Rosneft, with regard to which the latter acts as a parent or a predominant (participating) entity.

RFY – a refining Entity of Rosneft Group.

ISLP&E – industrial safety, labour protection and environment.

EMS – the Energy Management System.

3. GENERAL PROVISIONS

Rosneft Oil Company, a leader of Russia's oil industry and one of the world's largest public oil&gas companies is successfully implementing a strategy of a steady growth of hydrocarbon production, expansion and modernization of RFY and increase in volumes of sale of own products directly to final consumers.

In the course of its production activities the Company is one of the largest consumers of energy resources of the Russian Federation. It realizes that rational utilization of energy resources is an important value alongside with improvement of results of the Company's primary production activities, industrial safety and environment.

The Company guarantees, that the nature and scale of energy utilization and consumption is under its control. When planning its activities the Company puts more emphasis on enhancement of energy efficiency and rational utilization of energy resources.

3.1. COMPANY'S OBJECTIVES IN THE AREA OF ENHANCEMENT OF ENERGY EFFICIENCY AND ENERGY SAVING

Primary objectives of the Company in the area of energy efficiency and energy saving are:

- continuous enhancement of energy efficiency, rational utilization of energy resources and improvement of the management energy saving process in the course of all types of production activities;
- reduction of expenditure level through rational utilization of energy resources and introduction of latest innovative energy-efficient technologies;
- ensuring functioning and continuous improvement of the Energy Management System, meeting requirements of GOST R ISO 50001 and ISO 50001.

3.2. COMPANY'S TASKS IN THE AREA OF ENHANCEMENT OF ENERGY EFFICIENCY AND ENERGY SAVING

For achievement of established objectives the Company undertakes to focus its efforts on solution of the following tasks:

- planning and implementation of production activities subject to legislative and other Company's requirements in the area of energy efficiency and energy saving;
- maintenance of accounting and control of consumption efficiency, as well as losses of energy resources, development and fulfillment of measures for their reduction;
- provision of accessibility of information and availability of resources in a required volume for achievement of established energy objectives and tasks;
- carrying out energy survey of objects of GS, elaboration of economically feasible energy - saving measures (application of new and innovative energy-efficient technologies) and inclusion of them in the Energy Saving Program of the Company and GS;
- determination of responsibility for energy saving and enhancement of energy efficiency at all management levels;

- raising the level of knowledge of the Company's employees in the area of energy efficiency and energy saving;
- involvement and stimulation of the Company's employees, influencing on consumption of energy resources, in activities for energy saving and their motivation;
- ensuring observance of requirements of the federal, regional and territorial legislation in the area of energy efficiency and energy saving, requirements of regulatory - legal and local regulatory documents governing the Company's activities;
- development of automated systems for accounting of energy resources and control of energy efficiency of technological objects and plants of a relevant level and depth of coverage, in accordance with local regulatory documents in the area of automation of technological processes and productions, as well as in the area of uniformity of measurement and control of quality of products, including development and introduction of the energy loss management system;
- staffing of the Energy Management System;
- fulfillment of measures, provided for under the Energy Saving Program of the Company and GS;
- involvement of all Company's employees in activities for enhancement of energy efficiency and energy saving. Carrying out of appropriate stimulation measures, systematic training and professional improvement of the Company's employees in the area of energy efficiency and energy saving;
- interaction with concerned parties (contracting organizations, general public, etc.), including their informing on matters of enhancement of energy efficiency in the Company and implementation of joint initiatives in the area of energy efficiency and energy saving;
- bringing this Policy of the Company, relevant local regulatory documents and standards in the area of energy efficiency and energy saving, adopted in the Company to notice of the Company's employees, contracting organizations and suppliers, carrying out works on production objects of the Company and demanding their observance.

Being conscious of the need to enhance energy efficiency and to utilize energy resources in a rational manner, the senior management of Company and GS undertakes an obligation to implement the Policy in the area of energy efficiency and energy saving.

3.3. PRINCIPLES IN THE AREA OF ENHANCEMENT OF ENERGY EFFICIENCY AND ENERGY SAVING

The Policy is implemented subject to the following basic principles:

- observance of requirements of the legislation of the Russian Federation, applicable provisions of the international law, requirements of the Russian and applicable international standards, industrial standards and corporate requirements;
- provision of accounting and control of efficiency of consumption as well as losses of energy resources;
- inclusion of economically feasible new and innovative energy – efficient technologies in the Energy Saving Program;
- assessment of the risk of negative influence of the Energy Saving Program on basic production and financial indicators of the Company;

- monitoring of fulfillment of measures provided under the Energy Saving Program through energy efficiency audits;
- involvement of all Company's employees in activities for enhancement of energy efficiency and energy saving;
- implementation of the whole economically accessible and practically realizable package of measures for reduction of specific consumption of energy resources for a given volume of production under comparable operating conditions.

3.4. MANAGEMENT OBJECTS

Basic management objects in the area of enhancement of energy efficiency and energy saving are processes, implemented in all productive assets and at all production units of the Company, connected with consumption of energy resources.

Managed **processes** are sub-divided into:

- **production processes** (primary production in productive assets);
- **supporting processes** (supporting of primary production – for example, material-technical supply, personnel management).

Management objects also include the following business-management processes and their outcomes (the Energy Saving Program, reports):

- Energy planning;
- Implementation of the Energy Saving Program;
- Audit of energy efficiency;
- Energy analysis.

3.5. BUSINESS PROCESSES TO MANAGE ENERGY EFFICIENCY AND ENERGY SAVING

Table 1
Business - processes to manage energy efficiency and energy saving

№	BUSINESS-PROCESS	OUTCOME
1	2	3
1	Energy planning	The Energy Saving Program of the Company / GS including organization and technical measures aimed to reduce consumption of energy resources in the course of production processes, approved by the Rosneft Energy Efficiency Commission.
2	Implementation of the Energy Saving Program	Report on implementation of the Energy Saving Program of the Company / GS approved by the Rosneft Energy Efficiency Commission. Results of implementing measures under the Energy Saving Program: <ul style="list-style-type: none"> ▪ Introduction of new energy-efficient technologies; ▪ Optimization of production processes; introduction of control procedures; ▪ Attainment of energy efficiency.
3	Audit of energy efficiency	Report on performance of GS including: <ul style="list-style-type: none"> ▪ assessment of the current level of organization of the process to enhance energy efficiency; ▪ a list of recommendations on improvement of the organization process; ▪ a list of recommendations on elaboration of technical measures for energy saving on processes and individual objects with a high potential of energy saving.
4	Energy analysis	The outcome of the energy analysis constitutes decisions and actions made by the Rosneft Energy Efficiency Commission on the basis of the Report on Implementation of the Energy Saving Program and results of audit of energy efficiency regarding: <ul style="list-style-type: none"> ▪ changing of planned energy performance; ▪ changing of the Policy; ▪ changing of indicators of energy efficiency; ▪ changing of objectives, tasks and other EMS elements, based on obligations on its continuous improvement; ▪ allocation of resources for support and improvement of EMS.

3.6.PERFORMANCE INDICES OF MANAGING ENERGY EFFICIENCY AND ENERGY SAVING

Table 2
Performance indices of managing energy efficiency and energy saving

№	NAME OF INDEC	DESCRIPTION OF INDEX	INDEX APPLICATION PROCEDURE
1	2	3	4
1	Enhancement of energy efficiency of operations.	Fulfilment of planned specific rates of energy consumption for production of one production unit considering measures of the Energy Saving Program.	The index is used for assessment of real effect of the Energy Saving Program.

3.7.MANAGEMENT LEVELS, DISTRIBUTION OF RESPONSIBILITY AND POWERS

For achievement of objectives and tasks established under this Policy the Company has two-level management structure including:

- Ist level in Rosneft:
 - Coordination Body of Rosneft - Rosneft Energy Efficiency Commission. The Chairman of the Commission is one of Top Managers by a decision of the Rosneft Chief Executive Officer, responsible for management of activities in the area of energy efficiency and energy saving throughout the whole perimeter of the Company;
 - ISU of Rosneft – a division for energy efficiency and energy saving of the Energy Department of Rosneft, responsible for organization and maintenance of activities in the area of energy efficiency and energy saving throughout the whole perimeter of the Company;
 - ISU managers at the level of business - blocks and business - segments of Rosneft (members of the Rosneft Energy Efficiency Commission), supervising activities in the area of energy efficiency and energy saving at the level of individual business-block or business-segment;
- IInd level in GS:
 - Coordinating bodies at the level of GS – Working Groups for energy efficiency and energy saving of GS under the direction of a representative of the senior management on EMS of GS, responsible for management of activities in the area of energy efficiency and energy saving in a GS;
 - ISU at the level of GS – a division for energy efficiency and energy saving of a GS, responsible for organization and maintenance of activities in the area of energy efficiency and energy saving in a GS;
 - Managers of ISU by areas of activities in GS (members of the Working Group for energy efficiency and energy saving of a GS), supervising activities in the area of energy efficiency and energy saving by areas of activities.

3.8. BASIC RISKS AND RISK MANAGEMENT TECHNIQUES

Table 3
Risk management

№	RISK	RISK MEASUREMENT INDICATOR	RISK MANAGEMENT MEASURES
1	2	3	4
1	Non-observance of applicable legislative requirements in the area of energy efficiency and energy saving	Penal sanctions.	<ol style="list-style-type: none"> Monitoring of legislative requirements in the area of energy efficiency and energy saving and ISLP&E. Control over fulfilment of legislative requirements in the area of energy efficiency and energy saving and ISLP&E.
2	Adverse effect of the Energy Saving Program on achieving of targets of the production program and fulfillment of basic production and financial indicators of the Company's business plan.	<ul style="list-style-type: none"> Reduction of production volumes by areas of the Company's production activity. Reduction of sales volumes of the Company's products. 	<ol style="list-style-type: none"> Control over correctness of planning measures for enhancement of energy efficiency. Regular control over fulfilment of measures and their effect on the Company's primary production activities and sales volumes of the Company's products. Creation of the knowledge base including lessons drawn.
3	Non-attainment of the planned effect from the Energy Saving Program (non-fulfilment of the Energy Saving Program).	<p>Level of adequacy of actual indicators of the Energy Saving Program with those planned:</p> <ul style="list-style-type: none"> saving of electrical power; saving of heating energy; saving of fuel; reduction of losses of energy resources. <p>Level of adequacy of actual indicators of fulfilment of a business with those planned:</p> <ul style="list-style-type: none"> for GS involved in oil&gas production – specific consumption of electric energy for liquid production, kW*h/t, for GS involved in oil&gas processing – specific consumption of energy resources for a volume of processed raw material, GJ/t. 	<ol style="list-style-type: none"> Control over correctness of planning measures for enhancement of energy efficiency. Control over financing of planning measures for enhancement of energy efficiency. Planning and analysis of technical and external factors having effect on absolute and specific indices of consumption of energy resources. Regular control over fulfilment of measures and verification of actual indicators of energy resources saving. Holding action owners liable for failure to implement energy efficiency actions.

For the purpose of effective risk control this Policy establishes the necessity of a systematic approach to management of risks connected with energy saving and energy efficiency.

The system approach will be secured by identification and management of key risks at all stages of the business – process for management of the energy saving and energy efficiency.

Detailed description of preventative actions (control procedures) is represented in local regulatory documents of the Company.

4. DISSEMINATION OF POLICY

This Policy is of a public nature.

This Policy shall be translated into English.

Dissemination of and provision of access to this Policy is carried out in accordance with the established procedure by means of informing of employees of Rosneft and GS, publication on internal and external information resources of the Company.

Introduction of this Policy and compliance monitoring of the Company's activities is carried out by the Rosneft Energy Efficiency Commission.

Audits to check the Company's factual activities compliance with this Policy and energy efficiency and energy saving legislation shall be conducted on an annual basis as well as control of the Policy's achieved objectives established in a relevant section hereof. Based on findings of monitoring the Policy may be duly adjusted for the purpose of update.

5. REFERENCES

1. GOST R ISO 50001-2012 Energy Management Systems. Requirements with guidance for use.
2. ISO 50001:2011 Energy management systems - Requirements with guidance for use = Energy Consumption Systems. Requirements with guidance for use.

REFERENCE APPENDIX. TERMS OF THE CORPORATE GLOSSARY AND EXTERNAL SOURCES

EXTRACT FROM THE CORPORATE GLOSSARY

- GROUP SUBSIDIARY (GS) – a business entity where Rosneft directly and (or) indirectly holds shares or equity stakes of 20 percent and more.
- ENERGY SAVING PROGRAM – a document setting energy efficiency parameters (indicators) and energy efficiency actions.
- INDEPENDENT STRUCTURAL UNIT (ISU) – a structural unit directly subordinate to the Chief Executive Officer of Rosneft or the top manager of Rosneft, the top manager of the Group Subsidiary or the deputy top manager of the Group Subsidiary.
- SENIOR MANAGEMENT – Rosneft Chief Executive Officer and Rosneft top managers.
- ROSNEFT ENERGY EFFICIENCY COMMISSION – a standing coordinating body of Rosneft that considers and makes decisions on items related to energy management and energy efficiency improvement.
- DIVISION FOR ENERGY EFFICIENCY AND ENERGY SAVING – a structural unit (employee) responsible for organization and maintenance of activities related to energy saving and energy efficiency improvement, including implementation of the energy management system.

Note:

- *Rosneft Energy Efficiency and Energy Saving Division is the Energy Efficiency and Energy Saving Division, part of the Rosneft Energy Department.*
- *It may have different names in various Group Subsidiaries (e.g. Energy Saving Section, Chief Power Engineer Section).*
- *If it is inexpedient to introduce a separate structural unit in a Group Subsidiary, its functions shall be assigned to a dedicated employee - Energy Manager.*
- *The status and number of employees of the Energy Efficiency and Energy Saving Structural Unit in the Group Subsidiary shall be agreed with the Human Resources Department and the Power Supply Department of Rosneft.*

- WORKING GROUP FOR ENERGY EFFICIENCY – a standing collegial body of the Group Subsidiary coordinating the implementation of general principles of energy management and energy efficiency improvement of the Group Subsidiary.

TERMS FROM EXTERNAL DOCUMENTS¹

¹ External documents are understood as normative legal acts, technical regulations (of the Customs Union and the Eurasian Economic Union), national standards and standardization rules, international standards, regional standards, regional codes of practice, interstate standards, standards of foreign countries, other external documents of similar status.

ENERGY MANAGEMENT SYSTEM

- a set of interrelated or interacting elements used to develop and implement the Energy Efficiency and Energy Saving Policy and energy objectives, as well as processes and procedures to achieve these objectives [clause 3.9 of GOST R ISO 50001-2012].

ENERGY PERFORMANCE

- measurable deliverables related to energy efficiency, utilization and consumption [clause 3.12 of GOST R ISO 50001-2012].

ENERGY EFFICIENCY

- characteristics reflecting the ratio of the benefits associated with the use of energy resources to the expenditures of energy resources made in order to obtain such benefits, with respect to products, technological process, legal entity [clause 4 Art. 2 of Federal Law dated 23.11.2009 № 261-FZ “On Energy Saving and Energy Efficiency Improvements and Amendments to Certain Legislative Acts of the Russian Federation”].

ENERGY RESOURCE

- energy carrier, which energy is used or can be used to perform business and other activities, as well as the type of energy (nuclear, thermal, electrical, electromagnetic energy or any other type of energy) [clause 1 Art. 2 of Federal Law dated 23.11.2009 № 261-FZ “On Energy Saving and Energy Efficiency Improvements and Amendments to Certain Legislative Acts of the Russian Federation”].

ENERGY SURVEY

- collection and processing of information on the use of energy resources in order to obtain reliable information on the volume of energy resources used and energy efficiency indicators, identify opportunities for energy saving and energy efficiency improvements with the indication of the deliverables in the energy passport [clause 7 Art. 2 of Federal Law dated 23.11.2009 № 261-FZ “On Energy Saving and Energy Efficiency Improvements and Amendments to Certain Legislative Acts of the Russian Federation”].

ENERGY

- electricity, fuel, steam, heat, compressed air and other similar media [clause 3.5 of GOST R ISO 50001-2012].

ENERGY SAVING

- implementation of organizational, legal, technical, technological, economic and other measures aimed at reducing the volume of energy resources used while maintaining the corresponding benefits from their use (including the volume of products produced, work performed, services rendered) [clause 3 Art. 2 of Federal Law dated 23.11.2009 № 261-FZ “On Energy Saving and Energy Efficiency Improvements and Amendments to Certain Legislative Acts of the Russian Federation”].

REFERENCE APPENDIX. LND CHANGE REGISTRATION SHEET

VERSION/ AMENDME NT	DATE AND DETAILS OF ROSNEFT OIL COMPANY ADMINISTRATIVE DOCUMENTS			BRIEF ANNOTATION
	APPROVAL	ENACTMENT (BRINGING INTO EFFECT)	LOSS OF EFFECT	
1.00	20.03.2014 Minutes of the Rosneft Board of Directors Meeting dated 20.03.2014 № 28	14.11.2012 order dated 21.04.2014 № 208	28.08.2017	Establishes general principles of activities aimed at improving energy efficiency and energy saving, including determining the goals of energy efficiency and energy saving, objectives, principles, management objects, management business processes, management efficiency indicators, main risks and risk mitigation methods
Amend. 1	30.06.2017 Minutes of the Rosneft Management Board Meeting dated 30.06.2017 № Пр-ИС-22п	28.08.2017 order dated 28.08.2017 № 489	04.10.2023	-
Amend. 2	21.07.2023 Minutes of the Rosneft Management Board Meeting dated 21.07.2023 № Пр-ИС-11п	04.10.2023 order dated 04.10.2023 № 00395-23		Technical update was performed as follows: 1) removal of fragments from the Scope of Application and Validity Period and Amendment Procedure subsections duplicating and contradicting the requirements of Standard of the Company № P3-12.02 C-0001 "Regulatory Control", version 2.00; 2) removal of the irrelevant position; 3) introduction of changes into the Terms and Definitions section; 4) layout shall be made in accordance with the requirements of Recommended Practices of the Company № P3-12.02 M-0001 "Preparation of Local Normative Documents", version 2