



**APPROVED BY**

**Resolution of the Rosneft Board of Directors**

**Minutes No. 10 dated October 29, 2018**

**Effective as of November 19, 2018**

**by Order No. 721 dated November 19, 2018**

# **REGULATIONS OF ROSNEFT**

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## **ON INSIDER INFORMATION**

**No. P3-01 R-0049 UL-001**

**VERSION 2.00**

**MOSCOW  
2018**

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# INTRODUCTORY PROVISIONS

## PURPOSE

The Regulations establish the requirements to the legal access and application of the data related to the insider information of Rosneft and is intended for:

- determination of the rules of referral:
  - ♦ of the data to the insider information of Rosneft;
  - ♦ of the persons to the Insiders of Rosneft;
- determination of the general requirements:
  - ♦ to establishment, alteration, and termination of procedure of use and access to the insider information of Rosneft;
  - ♦ to control of observance by Rosneft of the requirements of the legislation of the Russian Federation and the regulatory acts in the field of countermeasure to misuse of the insider information;
  - ♦ to disclosure of the insider information of Rosneft;
- regulation of the procedure of maintenance of the List of Insiders of Rosneft, notification of the persons of add (removal) to the List (from the List) of the Insiders of Rosneft, transfer of the List of Insiders of Rosneft to the trade organizer through which the transactions in financial instruments of Rosneft are performed, and/or to the regulator according to the procedure envisaged by the regulatory acts in the field of countermeasure to misuse of the insider information;
- establishment of the rules:
  - ♦ of performance by the Insiders of Rosneft of transactions in financial instruments of Rosneft including the procedure of notification of the Insiders of Rosneft of the transactions in financial instruments of Rosneft performed by them;
  - ♦ of confidentiality protection of the insider information of Rosneft.

The present Regulations have been developed in compliance with:

- Federal Law No. 224-FZ dated 27.07.2010 "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation";
- Order of the Federal Financial Markets Service of Russia No. 13-51/pz-n dated 18.06.2013 "On approval of the Regulations on procedure of notification of the persons of add into the list of insiders and removal from such list; the Regulations on procedure of transfer of the lists of insiders to the trade organizers through which the transactions in financial instruments, foreign currency, and (or) goods are performed; the Regulations on procedure and time frames of referral of notifications by the insiders concerning transactions performed by them";
- Instruction of the Bank of Russia No. 3379-U dated 11.09.2014 "On the list of insider information of the persons indicated in Items 1 - 4, 11 and 12 of Clause 4 of the Federal Law "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation".

## **APPLICATION SCOPE**

This Regulation shall be binding upon the employees of Rosneft structural units involved in the process of creation and (or) application of the data related to the insider information of Rosneft.

The regulatory, local normative and other internal documents shall not contradict the present Regulations.

## **VALIDITY AND AMENDMENT PROCEDURE**

The present Regulations are a permanent local normative document.

The present Regulations shall be approved, amended or deemed void at Rosneft by a decision of the Rosneft Board of Directors and put into force at Rosneft by an Order of Rosneft.

The initiators of the alterations made in the present Regulations shall be the following: the Corporate Governance Department of Rosneft and other structural subdivisions of Rosneft upon agreement with the Corporate Governance Department of Rosneft.

The Regulation shall require amendments in such cases as: changes to the legislation of the Russian Federation and regulations in the field of countering the misuse of insider information, organizational structure or the powers of the head etc.

# 1. TERMS AND DEFINITIONS

## CORPORATE GLOSSARY TERMS AND DEFINITIONS

**INSIDER OF ROSNEFT** – an individual and (or) a legal person (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, fulfillment of labor functions, or on the basis of an independent contractor agreement concluded with Rosneft, and added into the List of Insiders of Rosneft.

**INSIDER INFORMATION OF ROSNEFT**– the accurate and specific information that has not been disseminated or provided by Rosneft (including information representing commercial, service or other legally protected secret), dissemination or provision 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.

**COUNTERPARTY** – any Russian or foreign legal entity or person, international organization which has contractual relations with Rosneft, other than employment relations, as well as the Russian Federation, constituent entity(-ies) of the Russian Federation, foreign state(s), municipal structure represented by authorized bodies, and which have contractual relations with Rosneft.

**TRANSACTIONS IN FINANCIAL INSTRUMENTS** – performance of 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 of performance of the indicated actions including setting orders (issuing commissions).

**TRADE ORGANIZER** – a person rendering services for carrying out organized bidding on the goods market and (or) financial market on the basis of the exchange license or the mercantile system license.

**ORGANIZED BIDDING** – the bidding carried out on a regular basis according to the established rules envisaging the procedure of access of the persons to participation in the bidding to enter into the contracts of sale of goods, securities, foreign currency, repurchase agreements, and the contracts representing derivative financial instruments.

**LIST OF INFORMATION RELATED TO THE INSIDER INFORMATION OF ROSNEFT** – the list of confidential information drawn up on the base of the Order of the Federal Financial Markets Service of Russia No. 3379-18/pz-n dated 12.05.2011 "On the List of information related to the insider information of the persons indicated in the Items 1 - 4, 11 and 12 of the Clause 4 of the Federal Law "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" and approved by as well as procedure and time frames of disclosure of such information", and approved by the order of Rosneft.

*Note: The list of information related to the insider information of Rosneft is the public information published on the official website of Rosneft at: <http://www.rosneft.ru/Investors/insiders/>.*

**INFORMATION PROVISION** – the actions focused on acquisition of information by the certain range of persons in compliance with the securities legislation of the Russian Federation [Federal Law No.

224-FZ dated 27.07.2010 "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation"]].

**INFORMATION DISCLOSURE** – ensuring accessibility of the information for all concerned persons irrespective of the purposes of acquisition of this information in compliance with the procedure guaranteeing its discovery and acquisition.

**INFORMATION DISSEMINATION** – actions:

- focused on acquisition of the information by an uncertain range of persons or on transfer of the information to an uncertain range of persons particularly by its disclosure in compliance with the legislation of the Russian Federation concerning securities;
- associated with the information publishing in mass media including electronic, information-telecommunication networks, the access to which is not limited to a certain range of persons (including Internet);
- associated with the information dissemination through electronic, information and telecommunication networks, the access to which is not limited to a certain range of persons (including Internet) [Federal Law No. 224-FZ dated 27.07.2010 "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation"]].

**LIST OF INSIDERS OF ROSNEFT** – the confidential document containing the data on the insiders of Rosneft (including personal data of the individual insiders) drawn and subject to maintenance in Rosneft on a permanent basis.

**ACTUAL ACCESS TO THE INSIDER INFORMATION OF ROSNEFT (ACCESS TO THE INSIDER INFORMATION OF ROSNEFT)** – an authorized direct access (including an access against the acceptance and transfer certificate) of a person to the data related to the insider information of Rosneft and to material media (hard copies, electronic media, databases, information systems, computer networks, and other media) containing the insider information of Rosneft.

**FINANCIAL INSTRUMENT** – a financial instrument (credit agreement, security, monetary obligation, futures, option etc.) which sale or transfer will ensure gaining and/or provisioning of cash, other financial assets or debt obligations.

*Note: For the purpose of this Agreement, the financial instrument means a security or a derivative financial instrument.*

## TERMS AND DEFINITIONS FOR THE PURPOSE OF THIS DOCUMENT

**REGISTER KEEPER (REGISTRAR)** – a legal person representing a professional participant of the security market and carrying out activity on maintenance of the security holder register.

**OFFICIAL** – an official appointed by the decision of the Board of Directors of Rosneft and accountable to the Board of Directors of Rosneft, whose liabilities include control of observance by Rosneft of the Federal Law No. 224-FZ dated 27.07.2010 "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" and the regulatory acts in the field of countering the misuse of the insider information adopted in compliance therewith.

**PROHIBITIVE PERIOD** – a period during which the insiders of Rosneft are not entitled to perform transactions in financial instruments of Rosneft.

**CONTACT PERSON** – an employee of the Board of Directors and Management Board Support Division of the Corporate Governance Department of Rosneft accountable for maintaining the List of Insiders of Rosneft.

**NEWS FEED** – an information resource being updated online and provided by the information agency.

**NON-STANDARD TRANSACTIONS** – transactions with the financial instruments of Rosneft bearing the marks of unlawful use of the insider information of Rosneft and (or) manipulation of market.

**PERMISSIVE PERIOD** – a period during which the insiders of Rosneft are entitled to perform transactions in financial instruments of Rosneft.

## 2. NOTATIONS AND ABBREVIATIONS

**CFR**– consolidated financial reporting.

**IFRS** – International Financial Reporting Standards.

**GROUP ENTITY** – a business entity where Rosneft directly and (or) indirectly holds shares or equity stakes of 20 percent and more.

**RAS** – Russian Accounting Standards.

**REGULATOR** – till 01.09.2013 – the federal executive authority for financial markets: the Federal Financial Markets Service (FFMS of Russia), since 01.09.2013 – the Bank of Russia Financial Markets Service (BRFMS), since 03.03.2014 – the Bank of Russia.

**STRUCTURAL UNIT** – a structural unit of Rosneft which has its own functions, objectives and responsibility within a designated scope of authority determined by the Structural Unit Regulations.

**ROSNEFT DISPATCH OFFICE** – the Document Flow Methodological Support Division of the Document Support and Archives Department of Rosneft.



### 3. INSIDER INFORMATION

3.1. The following information refers to the insider information of Rosneft:

- which exhaustive list is approved by instruction of the Bank of Russia No. 3379-U dated 11.09.2014 "On the list of information related to the insider information of the persons indicated in the Items 1 - 4, 11 and 12 of the Clause 4 of the Federal Law "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation",  
and
- added to the List of information related to the insider information of Rosneft approved by the Order of Rosneft.

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

- information which became available for an unlimited range of persons, particularly, as a result of its dissemination by disclosure of insider information of Rosneft or otherwise;
- 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 the person who has provided security for the bonds of Rosneft, if such person is the Russian Federation which has provided the state guarantee of the Russian Federation, a constituent entity 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.

## 4. INSIDERS

4.1. The following refer to the Insiders of Rosneft:

4.1.1. 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, including the register keeper (registrar);
- lending agencies;
- insurance companies;
- trade organizers.

4.1.2. members of the governing and control bodies of Rosneft (except for the General Shareholders Meeting):

- members of the Rosneft Board of Directors;
- members of the Rosneft Management Board;
- Chief Executive Officer of Rosneft;
- members of the Rosneft Audit Commission.

4.1.3. information agencies carrying out the disclosure or provision of information of Rosneft.

4.1.4. rating agencies providing ratings to Rosneft as well as to its securities.

4.1.5. individuals having access to the insider information of Rosneft on the basis of the labor and (or) independent contractor agreements entered into therewith.

4.2. Insiders of Rosneft shall fulfill the requirements established by Federal Law No. 224-FZ dated 27.07.2010 "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" and the regulatory acts in the field of countering the misuse of insider information, by the present Regulations:

- in respect of the procedure of performance of transactions in financial instruments of Rosneft;
- in respect of the procedure and time frames of notification of the transactions in financial instruments of Rosneft performed by the Insiders of Rosneft;
- other prohibitions and requirements established by Federal Law No. 224-FZ dated 27.07.2010 "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" and the regulatory acts in the field of countering the misuse of the insider information.

4.3. Insiders of Rosneft shall communicate information to Rosneft on the Rosneft securities owned by 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

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7 (seven) business days of the date of election/appointment to the relevant governing or control authority of Rosneft;

- the individuals having access to the insider information of Rosneft due to fulfillment of labor functions or the concluded independent contractor agreement shall communicate information within 7 (seven) business days of the date of the corresponding contract with Rosneft;
- 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 register keeper (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. LIST OF INSIDERS

### 5.1. GENERAL PROVISIONS

5.1.1. For the purpose of recording of the persons referred by Rosneft to its insiders, and also to fulfill the requirements of Federal Law No. 224-FZ dated 27.07.2010 "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation", and the regulatory acts in the field of countering the misuse of the insider information, Rosneft has arrangements in place to maintain the List of Insiders of Rosneft on a permanent basis.

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

5.1.2.1. about Rosneft:

- full and abbreviated company names;
- Taxpayer Identification Number (INN) and Primary State Registration Number (OGRN);
- registered address and mailing address;
- contact telephone number, fax number, and e-mail address.

5.1.2.2. about insiders – legal entities:

- full company name;
- Taxpayer Identification Number (INN) and Primary State Registration Number (OGRN);
- registered address and mailing address;
- contact telephone number, fax number, and e-mail address.

5.1.2.3. about 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.

5.1.3. The List of Insiders of Rosneft shall contain information about data and type of the event (add to (removal from) the List of the Insiders of Rosneft) and the basis for add (removal) of the person to the list (from the List) of the Insiders of Rosneft.<sup>1</sup> If an insider is included in the List of Insiders of Rosneft on more than one ground, all the grounds shall be specified in the List of Insiders of Rosneft.

The list of insiders of Rosneft can also contain information about the following:

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<sup>1</sup> Number of paragraph (s) shall be specified of Article 4 Federal Law No. 224-FZ dated 27.07.2010 "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation", based on which the individual is added to (removed from) the List of Insiders of Rosneft, as well as grounds for adding (removing) the person to (from) the List of Insiders of Rosneft, as specified under paragraph 5.2 of these Regulations, or a registration number of the agreement with a legal entity added (removed) to (from) the List of Insiders of Rosneft which conclusion (expiration) resulted in the inclusion (removal) of the respective legal entity to (from) the List of Insiders of Rosneft.

- contact person (surname, name, patronymic, telephone number and e-mail address of the specified person);
- category (categories) of the insider envisaged by Article 4 of Federal Law No. 224-FZ dated 27.07.2010 "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 No. 224-FZ dated 27.07.2010 "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).
- financial instrument of Rosneft, in which respect the person added to the List of Insiders of Rosneft shall send a notification of the transaction performed by him/her, if the type of the event of which the person is being notified is add of the person to the List of Insiders of Rosneft.

5.1.4. The hard copy of the List of Insiders of Rosneft shall be signed by the Official and sealed by Rosneft.

All sheets of the List of Insiders of Rosneft which volume exceeds one sheet shall be numbered, bound and sealed with the signature of the Official and the stamp of Rosneft.

5.1.5. Rosneft 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 to the regulator at their motivated written request (inquiry).

5.1.6. According to the procedure established by the regulatory acts in the field of countering the misuse of the insider information, and the Item 5.3. of the present Regulations, Rosneft 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 No. 224-FZ dated 27.07.2010 "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation".

## **5.2. PROCEDURE OF ADD (REMOVAL) OF PERSON TO (FROM) THE LIST OF INSIDERS OF ROSNEFT**

5.2.1. The person is subject to add to the List of Insiders of Rosneft in the following cases:

5.2.1.1. provision to a person (gaining an access by the person) of an actual access to the insider information of Rosneft on the basis of an independent contractor agreement entered into with him/her;

5.2.1.2. entering into (putting into force) a labor or independent contractor agreement (an agreement on altering the labor or independent contractor agreement) between Rosneft and a person which envisages a systematic access (permanent access) of the person to the insider information of Rosneft;

5.2.1.3. decision making by an authorized governing body of Rosneft on the election/appointment of a person as Chief Executive Officer of Rosneft, a member of the Rosneft Board of Directors, a member of the Rosneft Management Board or a member of the Rosneft Audit Commission (indicating details of such decision (details of the corresponding document: date of adoption,

number and date of the Minutes of a Meeting (Conference) of the authorized governing body of Rosneft));

5.2.1.4. provision by Rosneft of a preliminary notification to the regulator on forwarding of the voluntary, compulsory or competitive offer on acquisition of securities; in case that Rosneft forwarded the voluntary, compulsory or competitive offer on acquisition of securities which were not subject to on-exchange trading, but in respect of which an application was filed for admission to official listing – provision by Rosneft of the voluntary, compulsory or competitive offer on acquisition of the specified securities to the regulator;

5.2.1.5. entering into (putting into force) a contract between Rosneft and an information agency on the basis of which the information agency performs the disclosure or provision of the information of Rosneft (indicating details (date and number) of such contract);

5.2.1.6. provision to a rating agency (gaining by the rating agency) of an access to the insider information of Rosneft on the basis of the concluded independent contractor agreement for assigning rating to Rosneft and (or) the securities of Rosneft (indicating details (date and number) of such contract);

5.2.1.7. performance by an employee of Rosneft of employment duties related to the provision (gaining) of an access to the insider information of Rosneft on a permanent basis;

5.2.1.8. temporary provision to an employee of Rosneft (gaining by an employee of Rosneft) of an access to the insider information of Rosneft associated with the performance of certain employment duties;

5.2.1.9. on other grounds.

5.2.2. The person is subject to removal from the List of Insiders of Rosneft in the following cases:

5.2.2.1. dissemination, including disclosure, or provision of the insider information of Rosneft in compliance with the securities legislation of the Russian Federation;

5.2.2.2. termination (alteration) of a labor or an independent contractor agreement on the basis of which or in pursuance of which the person was provided with (gained) an access to the insider information of Rosneft;

5.2.2.3. termination of performance of the employment duties by an employee of Rosneft related to the provision (gaining) of an access to the insider information of Rosneft;

5.2.2.4. termination, including early termination, of authorities of a person who had held a position of Chief Executive Officer of Rosneft, a member of the Rosneft Board of Directors, a member of the Rosneft Management Board or a member of the Rosneft Audit Commission;

5.2.2.5. execution of the legally effective court decision on removal of a person from the List of Insiders of Rosneft;

5.2.2.6. erroneous (illegal) add of a person to the List of Insiders of Rosneft;

5.2.2.7. on other grounds (including the case of business termination as a result of liquidation or reorganization (in the form of merger, takeover or division) of a legal entity included into the List of

Insiders of Rosneft; removal of a legal entity as an invalid body from the Unified State Register of Legal Entities (termination (forfeit) of legal capacity of the legal entity), death of an individual included into the List of Insiders of Rosneft, declaration of an individual as dead or missing).

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

5.3.1. Rosneft shall notify the person related to its insiders of add of such person to the List of Insiders of Rosneft, removal of such person from the specified List, or of changed grounds for adding the person in the specified List.

5.3.2. The person shall be notified of add to (removal from) the List of Insiders of Rosneft **no later than within 7 (seven) business days of the date of add of the person to the List of Insiders of Rosneft or from the date of removal from the specified List, respectively.**

The person shall be notified of changed grounds for adding the person to the List of Insiders of Rosneft no later than within 7 (seven) business days of the date of making the respective modifications to the specified List.

5.3.3. Notification of a person of add to (removal from) the List of Insiders of Rosneft shall be drawn according to the form contained in [Appendices 1-4](#) to the present Regulations.

A person shall be notified of changed grounds for adding the person to the List of Insiders of Rosneft by forwarding a free-format notification which shall specify all the grounds for adding the person to the specified List.

5.3.4. Notification of add to (removal from) the List of Insiders of Rosneft can be drawn in the form of a hard copy and (or) in electronic form with an electronic signature in compliance with the requirements of the legislation of the Russian Federation. The Notification of add to (removal from) the List of Insiders of Rosneft shall be assigned with the date and the reference number.

A hard copy Notification of add to (removal from) the List of Insiders of Rosneft shall be signed by the Official and sealed by Rosneft.

All sheets of the Notification of add to (removal from) the List of Insiders of Rosneft which volume exceeds one sheet shall be numbered, bound and sealed with the signature of the Official and the stamp of Rosneft.

5.3.5. Rosneft shall notify the person of his/her add to (removal from/changed grounds for adding the person to) the List of Insiders of Rosneft through the following:

- service of the Notification of add to (removal from/changed grounds for adding the person to) the List of Insiders of Rosneft against written acknowledgement directly to the person added to (removed from) the List of the Insiders of Rosneft,
- or
- sending the Notification of add to (removal from/changed grounds for adding the person to) the List of insiders of Rosneft to the last of the addresses of the indicated person known by Rosneft via mail, telegraphic, teleprinter, or electronic communication enabling a reliable establishment of the fact of sending of the Notification.

In case that the Notification of add to (removal from/changed grounds for adding the person to) the List of Insiders of Rosneft is drawn in the form of a hard copy, the relevant person can be notified

by sending, using electronic communication, including the information-telecommunication network Internet, the electronic document (electronic digital form to which the hard copy document has been converted by scanning).

5.3.6. If the Notification of removal from the List of Insiders of Rosneft sent to the last address of the removed person known to Rosneft was not received by this person, Rosneft shall take all reasonable measures available in such circumstances to identify the address of the person to which the Notification of removal from the List of Insiders of Rosneft can be sent.

5.3.7. The person added to (removed from) the List of the Insiders of Rosneft is entitled to request from Rosneft a hard 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, Rosneft shall send (hand in) to such person a hard copy of the Notification of add to (removal from) the List of Insiders of Rosneft signed by the Official and sealed by Rosneft within 7 (seven) business days of the date of receipt of the relevant requirement of the person. All sheets of the copy of the Notification of add to (removal from) the List of Insiders of Rosneft which volume exceeds one sheet shall be numbered, bound and sealed with the signature of the Official and the stamp of Rosneft.

5.3.8. Rosneft shall timely inform all the persons added to the List of Insiders of Rosneft of any alterations in its details specified under Item 5.1.2.1. of the present Regulations, particularly, by publishing a relevant statement on its official site.

5.3.9. Rosneft performs recording of all sent Notifications of add to (removal from/changed grounds for adding the person to) the List of Insiders of Rosneft. The full information on the sent Notifications of add to (removal from/changed grounds for adding the person to) the List of Insiders of Rosneft is stored at Rosneft for at least 5 (five) years from the date of removal of the person from the List of Insiders of Rosneft.



## 6. OPERATIONS WITH THE FINANCIAL INSTRUMENTS OF ROSNEFT

### 6.1. PROCEDURE OF PERFORMANCE OF TRANSACTIONS IN FINANCIAL INSTRUMENTS OF ROSNEFT BY THE INSIDERS OF ROSNEFT

6.1.1. Rosneft establishes the permissive and prohibitive periods for the Insiders of Rosneft to perform operations with the financial instruments of Rosneft.

6.1.2. To exclude the risk of recognition of transaction in the financial instruments of Rosneft as a non-standard transaction the Rosneft insiders are recommended to be guided by the following rules:

6.1.2.1. It is recommended to perform transactions in the financial instruments of Rosneft during the permissive period determined as the period from the date following the date of disclosure of IFRS CFR (annual audited and interim unaudited) till the 14th (fourteenth) calendar day, inclusive, of the first month of the quarter following the quarter when the CFR was disclosed;

6.1.2.2. the prohibitive period comprises the periods determined by the following rules:

- the period of 30 (thirty) calendar days after the date of purchase of the financial instruments of Rosneft (for sale of the financial instruments of Rosneft);
- the period from the 15th (fifteenth) calendar day of the first month of the quarter till the date of CFR disclosure for the previous quarter, inclusive.

6.1.3. Performance of transactions in the financial instruments of Rosneft by the Insider of Rosneft using the insider information of Rosneft is prohibited.

Performance of transactions in the financial instruments of Rosneft by the Insider of Rosneft in the prohibitive period and in the period from the date of creation of information by the Insider of Rosneft or the date when the information relating to the insider information of Rosneft became known to the Insider of Rosneft till the date of disclosure of such information, is indicative of the possible illegal use of the insider information of Rosneft by the Insider of Rosneft when performing such transactions.

The Insider of Rosneft who has performed such a transaction during the period specified in this paragraph shall prove that he or she performed this transaction in the financial instruments of Rosneft without using the insider information of Rosneft.

6.1.4. To exclude the risk of transactions in the financial instruments of Rosneft during the prohibitive period, the Insiders of Rosneft are recommended to consult with the Official or the Contact Person prior to the said transactions.

### 6.2. PROCEDURE OF NOTIFICATION OF TRANSACTIONS IN FINANCIAL INSTRUMENTS OF ROSNEFT PERFORMED BY THE INSIDERS OF ROSNEFT

6.2.1. The Insiders of Rosneft representing:

- members of the Board of Directors of Rosneft;
- members of the Management Board of Rosneft;

- Chief Executive Officer of Rosneft;
- members of the Audit Commission of Rosneft;
- individuals having access to the insider information of Rosneft on the basis of the labor and (or) independent contract agreements entered into therewith.,

shall notify Rosneft of the transactions in financial instruments of Rosneft performed by them, including:

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

6.2.2. Notification of transactions in financial instruments of Rosneft performed by the Insider shall be drawn according to the form contained in the [Appendixes 5, 6](#) to the present Regulations.

6.2.3. The Insider of Rosneft representing the person specified under Item 6.2.1. of the present Regulations who has performed the corresponding transaction in financial instruments of Rosneft shall notify Rosneft thereon **within 10 (ten) business days of the date of the relevant transaction in financial instruments of Rosneft**, if no shorter timeframe has been established by Federal Law No. 224-FZ dated 27.07.2010 "On countering the misuse of insider information and market manipulation and amending certain laws of the Russian Federation" or regulatory acts in the field of countering the misuse of the insider information.

6.2.4. The Insider of Rosneft who does not represent the person indicated under Item 6.2.1. of the present Regulations shall notify Rosneft of the transactions in financial instruments of Rosneft performed by him/her in case of reception of the relevant request from Rosneft.

6.2.5. The Insider of Rosneft shall notify the regulator of the transactions in financial instruments of Rosneft performed by him/her in case when the motivated written inquiry (request, direction) is received from the regulator.

6.2.6. Upon receiving the request from Rosneft and/or regulator, the Insider of Rosneft shall send the Notification of transactions in financial instruments of Rosneft performed by the Insider to the corresponding addressee within 10 (ten) business days after the date of receiving the relevant inquiry (request, direction).

6.2.7. The Insider of Rosneft is entitled to specify information about several transactions performed by him/her in a single Notification of the transactions in financial instruments of Rosneft performed by the Insider. At the same time, the conditions upon which each transaction in financial instruments of Rosneft is performed shall be specified separately.

6.2.8. The Notification of transactions in financial instruments of Rosneft performed by the Insider **shall be sent to Rosneft** in one of the following ways:

- submission of the Notification to the Rosneft Dispatch Office or delivery against receipt to the Official or other person defined by him/her;
- sending by mail in a registered letter with a delivery confirmation;
- sending an electronic document electronically signed in compliance with the requirements of the legislation of the Russian Federation;
- other way specified by Rosneft.

6.2.9. The Notification of transactions in financial instruments of Rosneft performed by the Insider **shall be sent to the regulator** in one of the following ways:

- submission to the Dispatch Office of regulator's head office;
- sending by mail in a registered letter with a delivery confirmation;
- sending an electronic document electronically signed in compliance with the requirements of the legislation of the Russian Federation;
- via the Personal Web-based Account of the information exchange system member link to which is provided at regulator's official website in the information-telecommunication network Internet.

6.2.10. The Notification of transactions in financial instruments of Rosneft performed by the Insider provided as a hard copy shall be signed by the Insider of Rosneft (authorized person of the Insider of Rosneft), and if the Insider of Rosneft is a legal entity it shall affix its stamp (if available).

The Notification of transactions in financial instruments of Rosneft performed by the Insider of Rosneft which is a foreign entity may not be certified by stamp (sealed) by the foreign entity if such certification by stamp (sealing) is not required by the personal law or constituent documents of the foreign entity.

The Notification of transactions in financial instruments of Rosneft performed by the Insider containing more than one sheet shall be bound, while the sheets of the Notification shall be numbered. In case when the Notification of transactions in financial instruments of Rosneft performed by the Insider is sent by the Insider which is a legal entity, then the hard copy of the stated notification shall be sealed by this legal entity on the binding and signed by an authorized person of such legal entity. In case when the Notification of transactions in financial instruments of Rosneft performed by the Insider is sent by an individual as the Insider, each page of the hard copy shall be signed by this individual.

In case that the Notification of transactions in financial instruments of Rosneft performed by the Insider is sent on behalf of the insider of Rosneft by his/her authorized representative, the specified Notification shall be provided together with the power of attorney (a duly certified copy of the power of attorney) or other document (a duly certified copy of the document) granting such authorities to the representative.

6.2.11. In order to prevent and suppress the misuse of the insider information of Rosneft when performing transactions in financial instruments of Rosneft, members of the Rosneft Board of Directors, members of the Rosneft Management Board and Chief Executive Officer of Rosneft shall notify the Official in writing regarding their intention to individually perform the transactions in financial instruments of Rosneft prior to performance thereof.

Members of the Rosneft Board of Directors, members of the Rosneft Management Board and Chief Executive Officer of Rosneft shall quarterly notify the Official of the transactions in financial instruments of Rosneft performed by them.

## 7. PROCEDURE OF ACCESS TO INSIDER INFORMATION

7.1. The access to the insider information of Rosneft is provided to the persons added to the list of insiders of Rosneft in compliance with the Items 4.1., 5.2.1. of the present Regulations, the requirements of Federal Law No. 224-FZ dated 27.07.2010 "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation" and the regulatory acts in the field of countermeasure to misuse of the insider information adopted in compliance with it.

7.2. The persons having an access to the insider information of Rosneft shall observe restrictions and prohibitions envisaged by the Items 8.3.-8.5. of the present Regulations and Federal Law No. 224-FZ dated 27.07.2010 "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation".

Any person not included in the list of insiders of Rosneft and having no right to access to the insider information of Rosneft, who has obtained however the access to it for some reason shall proceed as follows:

- immediately discontinue familiarization with such information;
- take exhaustive measures on preservation of confidentiality of the insider information of Rosneft, particularly, prevent from dissemination and provision of such information;
- observe restrictions and prohibitions envisaged by the Items 8.3.-8.5. of the present Regulations and Federal Law No. 224-FZ dated 27.07.2010 "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation" .

7.3. When providing a right to access to the insider information of Rosneft to the employee, Rosneft shall:

- familiarize the employee against written acknowledgment with the Regulations and the List of information related to the insider information of Rosneft;
- create all necessary conditions for the employee to observe the procedure of application of the insider information of Rosneft established by Rosneft;
- carry out other actions intended for confidentiality protection of the insider information of Rosneft.

## 8. PROCEDURE OF APPLICATION OF INSIDER INFORMATION

8.1. The Insiders of Rosneft shall adhere to the non-disclosure behavior in respect of the insider information of Rosneft which is envisaged by the present Regulations until the official disclosure of Rosneft's insider information by Rosneft.

8.2. The insider information of Rosneft shall be applied exclusively on behalf of Rosneft, for provision of industrial and economic, financial and other activities of Rosneft according to Federal Law No. 224-FZ dated 27.07.2010 "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation", the present Regulations, on the basis of employment agreements and (or) job descriptions or independent contractor agreements entered into with the third parties .

8.3. The persons who have obtained the access to the insider information of Rosneft, including the Insiders of Rosneft, shall not be entitled to:

- disclose the known (leaked out) insider information of Rosneft;
- apply the insider information of Rosneft for the purposes not associated with their professional activity in Rosneft and (or) for the purposes not envisaged by the terms of independent contractor or employment agreements/contracts entered into with Rosneft;
- apply the insider information of Rosneft for personal benefit or for benefit of someone else;
- apply the insider information of Rosneft to perform operations with financial instruments of Rosneft;
- communicate or made available the insider information of Rosneft to any other parties for the purpose of performance of operations in financial instruments of Rosneft by them, as well as communicate to such persons any recommendations on performance of the indicated operations based on the insider information of Rosneft.

8.4. Application of the insider information of Rosneft by the persons specified in the Item 8.3. of the present Regulations is forbidden:

- for performance of the operations in financial instruments of Rosneft affected by the insider information of Rosneft at own expenses or at expenses of someone else, except for performance of operations within discharge of liability on purchase or sale of the financial instruments of Rosneft which deadline has come, if such liability had occurred as a result of operation in financial instruments of Rosneft performed before the person has learnt the insider information of Rosneft;
- by communicating it to another person except for the cases when such information is communicated to the person included in the list of insiders of Rosneft due to discharge of liabilities established by the federal laws, due to discharge of labor liabilities or performance of a contract;
- by giving recommendations to other parties, otherwise obliging or motivating them to purchase or sale of the financial instruments of Rosneft.

8.5 Performance of activities related to market manipulation is forbidden according to Federal Law No. 224-FZ dated 27.07.2010 "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation".

8.6 The requirement of adherence to the non-disclosure behavior in respect to the insider information of Rosneft also covers the Insiders of Rosneft who have terminated discharge of labor liabilities, functions, or other service liabilities in Rosneft before the date when the information acquired by such persons loses the status of the insider information of Rosneft in compliance with Item 9.5. of the present Regulations.

The persons indicated in the present item are entitled to disclose the insider information of Rosneft exclusively in cases and according to the order envisaged by the independent contractor or employment agreements concluded with them, or the legislation in force.

8.7. Any application of the insider information of Rosneft performed with violation of the conditions envisaged in the present section, including application of the insider information of Rosneft for the personal benefit of the persons possessing the insider information and other parties (apart from Rosneft) is illegal and entails liability envisaged by the Board of Directors and the legislation of the Russian Federation.

## 9. DISCLOSURE OF INSIDER INFORMATION

9.1. The information included in the List of information related to the insider information of Rosneft is subject to disclosure except for the following information:

- concerning decisions made by the Rosneft Board of Directors on issues within its competence according to the Statute of Rosneft if such information refers to Rosneft's confidential information (except for the information about the decisions made by the Rosneft Board of Directors on issues regarding its competence in compliance with the federal laws);
- concerning terms of the contract regarding maintaining (stabilizing) prices of Rosneft securities (foreign issuer's securities certifying the rights in respect of Rosneft securities), except for the duration of the specified contract.

9.2. The information included in the List of information related to the insider information of Rosneft is subject to disclosure following the procedure and the time frames envisaged by regulator's laws and regulations for the disclosure of notices on securities issuers' material facts.

9.3. Rosneft's insider information notice shall be disclosed within the following time frames after the relevant fact (event, action) date or the date when Rosneft learns or is supposed to learn on its occurrence:

- in the newsfeed – no later than 1 (one) calendar day;
- on a webpage in the information-telecommunication network Internet – no later than 2 calendar days.

If the time of disclosing Rosneft's insider information notice falls on a non-business day, the indicated notice shall be disclosed on the next succeeding business day.

9.4. When after the disclosure or provision of the insider information by Rosneft the data contained in the specified information are changed the information thereof shall be disclosed or provided by Rosneft according to the same procedure no later than the next business day after the day when Rosneft learns or is supposed to learn about such changes.

9.5. The information included in the List of information related to the insider information of Rosneft loses the insider information status after the disclosure.

9.6. The information about Rosneft securities possession provided by the Chief Executive Officer of Rosneft, members of the Rosneft Board of Directors, members of the Rosneft Management Board or members of the Rosneft Audit Commission following the procedure envisaged by Items 4.3., 6.2.11 of the present Regulations shall be disclosed in Rosneft annual and quarterly statements.



## 10. RULES OF PROTECTION OF INSIDER INFORMATION CONFIDENTIALITY

10.1. Rosneft provides the necessary organizational and technical conditions for Rosneft Insiders to adhere to the non-disclosure behavior established in Rosneft, and also implements all necessary and sufficient measures oriented to protection of its insider information against misuse.

The stated measures are implemented to:

- protect Rosneft insider information from illegal or accidental access, destruction, alteration, blocking, copying, provision, dissemination, and other illegal actions with Rosneft insider information;
- ensure control of activity of persons who have access to the insider information of Rosneft on the base of the established restrictions for its application;
- ensure observation of the application procedure with regard to the insider information of Rosneft, particularly, by elimination of risk of its misuse by the Insiders of Rosneft not for the benefit of Rosneft;
- increase the level of credibility to Rosneft on the part of its investors, shareholders, and contractors.

10.2. In order to protect confidentiality of the insider information of Rosneft, particularly, against the unauthorized access, misuse or transfer of any data related to the insider information of Rosneft to other parties, Rosneft develops and (or) applies the following measures:

- introduction of access control for some premises occupied by Rosneft (including non-business days);
- identification of physical media of the insider information and the handling rules for such physical media;
- privacy marking of the physical media containing the insider information of Rosneft with the "Insider Information" mark. The stated physical media can be provided only to the Insiders of Rosneft.;
- timely destruction of all physical media which are not subject to storage (including raw document, drafts, etc.) and can contain the insider information of Rosneft using the method established by Rosneft;
- provision of an actual access to the insider information of Rosneft to the limited range of persons (including the employees of Rosneft representing direct executors and providing fulfillment of requirements of the Federal Law No.224-FZ dated 27.07.2010 "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation"), while this refers only to the information necessary for execution of job duties by such persons within the provided authorities or rendering certain services on the base of independent contractor agreements with Rosneft;
- provision of a right to access or restriction of a right to access to the insider information of Rosneft to the employees of Rosneft on the base of the labor contracts, other agreements or job description; to counterparties on the base of the independent contractor agreements entered into with Rosneft;



- delimitation of rights and obligations of the employees of Rosneft, presence of the job description for each employee of Rosneft defining his/her job duties and rights (including the right to access the insider information of Rosneft for performance of job duties);
- familiarizing all Rosneft employees against written acknowledgment with the present Regulations and the List of information related to the insider information of Rosneft;
- use of software and hardware in Rosneft to prevent unauthorized access to the insider information of Rosneft as required by Company's internal documents covering cyber security of Rosneft confidential information;
- by the decision of the Official, assessment of Rosneft employees' knowledge of provisions of the present Regulations;
- taking other measures to restrict access to the insider information of Rosneft offered by the Official upon agreement with the Chief Executive Officer of Rosneft.

10.3. When transferring documents containing insider information to Rosneft structural units or outside Rosneft such documents (office memos, reply letters, copies, etc.) shall be marked as "Insider Information".

10.4. Decision on the insider nature of the information shall be taken by the immediate originator of a document based on the List of information related to the insider information of Rosneft freely available without restrictions on the Rosneft official website.

Document marking as "Insider Information" shall be agreed with the head of a Rosneft structural unit.

The marking shall be done by the Rosneft employee who originated the document by way of stamping the first page of a bound document or top right corner on each page of unbound document, the stamp containing no inverted commas.

10.5. The document immediate originator shall be personally liable for his/her compliance with the confidentiality requirements to the insider information of Rosneft with regard to such information.

10.6. When making copies of a document with the "Insider Information" marking valid (not canceled) at the time of copying, all the copies of such document shall be marked accordingly. This does not require an approval of Rosneft's structural unit leader.

10.7. After the insider information of Rosneft is disclosed as appropriate, the "Insider Information" marking shall become invalid.

If a document contains the insider information of Rosneft only part of which is disclosed as appropriate, the "Insider Information" marking shall remain valid with the confidentiality requirements applied to the insider information of Rosneft not disclosed as appropriate.

10.8. Draft and raw documents which if agreed/approved will contain the insider information of Rosneft and draft notices on information disclosure on the security market in the course of their preliminary agreement shall not be marked as "Insider Information" while the employees of Rosneft who have access to such draft and raw documents shall follow other Rosneft insider information protection rules envisaged in this Section.

After the agreement process is over the draft/raw documents specified herein shall be destroyed.

10.9. If a document apart from the insider information of Rosneft contains commercial secret or restricted information such document shall be classified according to the Company Standard "Confidential Data Protection", Ref. P3-11.03 S-0006. No additional marking as "Insider Information" shall be required in this case. In such a situation confidentiality protection measures shall be taken in line with the Company Standard "Confidential Data Protection", Ref. P3-11.03 S-0006.

10.10. The insider information of Rosneft shall be handled at Rosneft employees' automated workstations equipped with certified information security tools. Outside office hours, documents containing Rosneft insider information shall be kept in strong boxes or lockable cases.

10.11. Rosneft employees shall immediately inform their direct managers or their deputies about a loss or shortage of documents or files with insider information, of keys to strong boxes (storages), passes, passwords or about unauthorized access to the insider information of Rosneft, etc.

10.12. It is not allowed to store/process insider information of Rosneft using information systems not intended for storage/processing of confidential data or to place the Rosneft confidential information on external media not registered at Rosneft.

10.13. Counterparties and state or municipal authorities shall be provided with documents or other media and electronic documents containing the insider information of Rosneft in line with the procedure established in the Company.

10.14. On termination of the employment agreement, Rosneft employees prior to the employment agreement termination date shall hand over to the immediate manager all physical media containing the insider information of Rosneft.

## **11. CONTROL OF OBSERVANCE OF REQUIREMENTS OF FEDERAL LAW NO. 224-FZ DATED 27.07.2010 "ON COUNTERING THE MISUSE OF INSIDER INFORMATION AND MARKET MANIPULATION AND AMENDING CERTAIN LAWS OF THE RUSSIAN FEDERATION"**

11.1. The control of observance by Rosneft of the requirements of Federal Law No. 224-FZ dated 27.07.2010 "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation" and the regulatory acts in the field of countermeasure to misuse of the insider information adopted in compliance with it is performed by the Official through the scheduled or selective inspections of the following:

- maintaining of the List of Insiders of Rosneft (including legitimacy of adding or removing persons to (from) the List of Insiders of Rosneft);
- observance of deadlines for notification of persons on adding to (removing from) the List of insiders of Rosneft;
- Rosneft insiders' observance of deadlines for notification on their operations with financial instruments of Rosneft.

11.2. Upon the inspection taken by the Official to control Rosneft compliance with the requirements of Federal Law No. 224-FZ dated 27.07.2010 "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation" and the regulatory acts in the field of countermeasure to misuse of the insider information adopted in compliance with it, report shall be drawn in free format.

11.3. The report shall specify information on the period of inspection and the events over the reporting period: about the fact of alterations made to the List of Insiders of Rosneft (quantity of persons added to (removed from) the List of the Insiders of Rosneft) and about the quantity of received Notifications of transactions in financial instruments of Rosneft performed by the Insiders.

The report shall contain indication of the fact of observance or violation by Rosneft of the requirements of Federal Law No. 224-FZ dated 27.07.2010 "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation" and the regulatory acts in the field of countermeasure to misuse of the insider information adopted in compliance with it.

In case when the inspection revealed any facts of violation of the requirements of Federal Law No. 224-FZ dated 27.07.2010 "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation" and the regulatory acts in the field of countermeasure to misuse of the insider information adopted in compliance with it, the report shall include information about the nature of such violations and recommendations on elimination of the revealed violations and prevention of similar violations in the future.

11.4. The report shall be submitted to the Rosneft Board Audit Committee for preliminary consideration and to the Rosneft Board of Directors.

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

12.1. The Insiders which are the employees of Rosneft bear liability for misuse of the insider information of Rosneft and can be held disciplinarily, administratively, criminally or civil liable in compliance with the legislation of the Russian Federation and the terms of the employment agreements.

12.2. The Insiders which are not the employees of Rosneft bear liability for misuse of the insider information of Rosneft and can be held administratively, criminally or civil liable in compliance with the legislation of the Russian Federation and the terms of the independent contractor agreements entered into with Rosneft.

12.3. Additionally, the persons which are not included into the List of Insiders of Rosneft, who however have obtained an access to the insider information of Rosneft and have disseminated it, or who have performed transactions in financial instruments of Rosneft with the use of its insider information can also be held liable, except for the cases envisaged by the legislation of the Russian Federation and/or regulatory acts in the field of countermeasure to misuse of the insider information.

12.4. Rosneft is entitled to seek indemnification from the persons guilty of misuse and/or dissemination its insider information.

## 13. REFERENCES

1. Federal Law No. 224-FZ dated 27.07.2010 "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation".
2. Order of the Federal Financial Markets Service of Russia No. 13-51/pz-n dated 18.06.2013 "On approval of the Regulations on procedure of notification of the persons of add into the list of insiders and removal from such list; the Regulations on procedure of transfer of the lists of insiders to the trade organizers through which the transactions in financial instruments, foreign currency, and (or) goods are performed; the Regulations on procedure and time frames of referral of notifications by the insiders concerning transactions performed by them".
3. The instruction of the Bank of Russia No. 3379-U dated 11.09.2014 "On the list of information related to the insider information of the persons indicated in the Items 1 - 4, 11 and 12 of the Clause 4 of the Federal Law "On countermeasure to misuse of the insider information and market manipulation, and on introduction of alterations in specific legislative acts of the Russian Federation".
4. Company Standard "Confidential Data Protection", Ref. P3-11.03 S-0006, Revision 5.00, approved by the resolution of the Management Board of Rosneft on 04.09.2017 (Minutes dated 04.09.2017 No.Pr-IS-32p), put into force by Rosneft Order 551 dated 25.09.2017.

## 14. REGISTRATION OF MODIFICATIONS TO THE LOCAL NORMATIVE DOCUMENT

**Table1**  
**List of changes to the Rosneft Regulations**

REVISION	TYPE AND NAME OF DOCUMENT	DOCUMENT NUMBER	APPROVAL DATE	EFFECTIVE DATE	DIRECTIVE DOCUMENT DETAILS
1	2	3	4	5	6
1.00	Rosneft Regulations "On Insider Information"	P3-01.04 R-0014 YuL-001	30.06.2014	24.07.2014	approved by the resolution of the Rosneft Board of Directors on 26.06.2014 (Minutes 39 of 30.06.2014) and put in effect by Rosneft Order 353 of 24.07.2014

# APPENDICES

**Table2**  
**List of appendices to the present Rosneft Regulations**

APPENDIX NUMBER	APPENDIX TITLE	NOTE
1	2	3
1	Form for individuals – Notification of add of person to the List of Insiders of Rosneft	Included in this file
2	Form for legal entities – Notification of add of entity 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 entity from the List of Insiders of Rosneft	Included in this file
5	Form for individuals – Notification of transactions in financial instruments of Rosneft performed by Insider	Included in this file
6	Form for legal entities – Notification of transactions in financial instruments of Rosneft performed by Insider	Included in this file

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

To:

dated “ \_\_\_ ” \_\_\_\_\_ 201\_\_

No. \_\_\_\_\_

### FORM – for individuals

#### NOTIFICATION of add of person to the List of Insiders

No.	I. Company details*	
1.1	Full corporate name of the Company	Rosneft Oil Company, Public Joint Stock Company
1.2	Tax ID (INN) of the Company	7706107510
1.3	Primary State Registration Number (OGRN) of the Company	1027700043502
1.4	Registered address of the Company	Sofiyskaya Embankment 26/1, Moscow 115035 the Russian Federation
1.5	Alternative mail address of the Company	Sofiyskaya Embankment 26/1, Moscow 117997 the Russian Federation
1.6	Telephone number of the Company	+7 (499) 517-8899
1.7	Fax number of the Company	+7 (499) 517-7235
1.8	E-mail address of the Company	postman@rosneft.ru
1.9.	Full name of the contact person responsible for maintenance of the List of Insiders of the Company	
1.10.	Telephone number of the contact person responsible for maintenance of the List of Insiders of the Company	
1.11.	E-mail address of the contact person responsible for maintenance of the List of Insiders of the Company	
1.12.	Category of insider to which the Company refers**	Issuer, Item 1 of Clause 4 of Law No. 224-FZ

No.	II. Information on individuals included in the List of the Company's insiders	
2.1	Full name of the insider	
2.2	Insider's date of birth	
2.3	Insider's place of birth	
2.4.	Individual's position in the Company	

No.	III. Information on the grounds for notification	
3.1	Type of event occurrence of which the person is notified	Add to the List of the Insiders
3.2	Date of the event of which the person is notified	
3.3.	Number of item (items) of Article 4 of Law 224-FZ according to which the person is	i. ___ of Article 4 of Law 224-FZ of 27.07.2010



	added to the List of Insiders	
3.4.	Grounds for add of the person to the List of Insiders indicated in Item 2.8 of the Regulations***, or the number of the agreement with the individual added to the List of Insiders on the conclusion of which the relevant person has been added to the List of Insiders	
3.5	Financial instrument in respect of which the person added to Company's List of Insiders shall provide notifications on transactions performed by him/her in compliance with Article 10 of Law 224-FZ	

Please note that from the date of add of the person to the Organization's List of Insiders, in respect of this person as an insider, the restrictions are implemented envisaged by Article 6 of Federal Law No. 224-FZ dated 27.07.2010 "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation" (hereinafter referred to as Federal Law), the liability is determined in compliance with Article 7 of the Federal Law, and the liabilities are imposed on such person envisaged by Article 10 of the Federal Law.

\_\_\_\_\_  
(job title  
of authorized person of the Company)

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

\_\_\_\_\_  
(initials and surname)

\_\_\_\_\_  
STAMP HERE  
(stamp)

Notes:

\* *Company shall be understood to mean Rosneft.*

\*\* *The category (categories) of the insider to which the Organization refers is indicated in compliance with Article 4 of the Federal Law; additionally, in respect of each category, the number of item of Article 4 of the Federal Law and description of the category according to the Federal Law shall be specified .*

\*\*\* *The Regulations on procedure of notification of the persons of add to the List of Insiders and removal from such list approved by the Order of FFMS of Russia No. 13-51/pz-n dated 18.06.2013.*

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

To:

dated “ \_\_\_ ” \_\_\_\_\_ 201\_\_

No. \_\_\_\_\_

### FORM – for legal entities

#### NOTIFICATION of add of person to the List of Insiders

No.	I. Company details*	
1.1	Full corporate name of the Company	Rosneft Oil Company, Public Joint Stock Company
1.2	Tax ID (INN) of the Company	7706107510
1.3	Primary State Registration Number (OGRN) of the Company	1027700043502
1.4	Registered address of the Company	Sofiyskaya Embankment 26/1, Moscow 115035 the Russian Federation
1.5	Alternative mail address of the Company	Sofiyskaya Embankment 26/1, Moscow 117997 the Russian Federation
1.6	Telephone number of the Company	+7 (499) 517-8899
1.7	Fax number of the Company	+7 (499) 517-7235
1.8	E-mail address of the Company	postman@rosneft.ru
1.9.	Full name of the contact person responsible for maintenance of the List of Insiders of the Company	
1.10.	Telephone number of the contact person responsible for maintenance of the List of Insiders of the Company	
1.11.	E-mail address of the contact person responsible for maintenance of the List of Insiders of the Company	
1.12.	Category of insider to which the Company refers**	Issuer, Item 1 of Article 4 of Law 224-FZ

No.	II. Information on legal entities included in the List of the Company's insiders	
2.1	Full corporate name of the Insider	
2.2	Tax ID (INN) of the Insider	
2.3	Primary State Registration Number (OGRN) of the Insider	
2.4.	Physical or mailing address of the Insider	

No.	III. Information on the grounds for notification	
3.1	Type of event occurrence of which the person is notified	Add to the List of the Insiders
3.2	Date of the event of which the person is notified	

3.3.	Number of item (items) of Article 4 of Law 224-FZ according to which the person is added to the List of Insiders	i. ___ of Article 4 of Law 224-FZ of 27.07.2010
3.4.	Grounds for add of the person to the List of Insiders indicated in Item 2.8 of the Regulations***, or the number of the agreement with the individual added to the List of Insiders on the conclusion of which the relevant person has been added to the List of Insiders	
3.5.	Financial instrument in respect of which the person added to Company's List of Insiders shall provide notifications on transactions performed by him/her in compliance with Article 10 of Law 224-FZ	

Please note that from the date of add of the person to the Organization's List of Insiders, in respect of this person as an insider, the restrictions are implemented envisaged by Article 6 of Federal Law No. 224-FZ dated 27.07.2010 "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation" (hereinafter referred to as Federal Law), the liability is determined in compliance with Article 7 of the Federal Law, and the liabilities are imposed on such person envisaged by Article 10 of the Federal Law.

\_\_\_\_\_  
(job title  
of authorized person of the Company)

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

\_\_\_\_\_  
(initials and surname)

STAMP HERE  
(stamp)

Notes:

\* *Company shall be understood to mean Rosneft.*

\*\* *The category (categories) of the insider to which the Organization refers is indicated in compliance with Article 4 of the Federal Law; additionally, in respect of each category, the number of item of Article 4 of the Federal Law and description of the category according to the Federal Law shall be specified .*

\*\*\* *The Regulations on procedure of notification of the persons of add to the List of Insiders and removal from such list approved by the Order of FFMS of Russia No. 13-51/pz-n dated 18.06.2013.*

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

To:

Destination:

dated “ \_\_\_ ” \_\_\_\_\_ 201\_\_

No. \_\_\_\_\_

#### FORM – for individuals

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

No.	I. Company details*	
1.1	Full corporate name of the Company	Rosneft Oil Company, Public Joint Stock Company
1.2	Tax ID (INN) of the Company	7706107510
1.3	Primary State Registration Number (OGRN) of the Company	1027700043502
1.4	Registered address of the Company	Sofiyskaya Embankment 26/1, Moscow 115035 the Russian Federation
1.5	Alternative mail address of the Company	Sofiyskaya Embankment 26/1, Moscow 117997 the Russian Federation
1.6	Telephone number of the Company	+7 (499) 517-8899
1.7	Fax number of the Company	+7 (499) 517-7235
1.8	E-mail address of the Company	postman@rosneft.ru
1.9.	Full name of the contact person responsible for maintenance of the List of Insiders of the Company	
1.10.	Telephone number of the contact person responsible for maintenance of the List of Insiders of the Company	
1.11.	E-mail address of the contact person responsible for maintenance of the List of Insiders of the Company	
1.12.	Category of insider to which the Company refers**	Issuer, Item 1 of Article 4 of Law 224-FZ

No.	II. Information on individuals excluded from the List of Company's insiders	
2.1	Full name of the insider	
2.2	Insider's date of birth	
2.3	Insider's place of birth	
2.4.	Individual's position (former position) in the Company	

No.	III. Information on the grounds for notification	
3.1	Type of event of which the person is notified	Exclusion from the List of Insiders

3.2.	Date of the event of which the person is notified	
3.3.	Number of item (items) of Article 4 of Law 224-FZ according to which the person is excluded from the List of Insiders	i. __ of Article 4 of Law 224-FZ of 27.07.2010
3.4.	Grounds for excluding the person from the List of Insiders indicated in Item 2.8 of the Regulations***, or the number of the agreement with the individual excluded from the List of Insiders on termination of which the relevant person is excluded from the List of Insiders	

\_\_\_\_\_  
 (job title  
 of authorized person of the Company)

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

\_\_\_\_\_  
 (initials and surname)

STAMP HERE

Notes:

\* *The Company shall mean Rosneft.*

\*\* *The category (categories) of the insider to which the Organization refers is indicated in compliance with Article 4 of the Federal Law; additionally, in respect of each category, the number of item of Article 4 of the Federal Law and description of the category according to the Federal Law shall be specified .*

\*\*\* *The Regulations on procedure of notification of the persons of add to the List of Insiders and removal from such list approved by the Order of FFMS of Russia No. 13-51/pz-n dated 18.06.2013.*

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

To:

Destination:

dated “ \_\_\_ ” \_\_\_\_\_ 201\_\_

No. \_\_\_\_\_

### FORM – for legal entities

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

No.	I. Company details*	
1.1	Full corporate name of the Company	Rosneft Oil Company, Public Joint Stock Company
1.2	Tax ID (INN) of the Company	7706107510
1.3	Primary State Registration Number (OGRN) of the Company	1027700043502
1.4	Registered address of the Company	Sofiyskaya Embankment 26/1, Moscow 115035 the Russian Federation
1.5	Alternative mail address of the Company	Sofiyskaya Embankment 26/1, Moscow 117997 the Russian Federation
1.6	Telephone number of the Company	+7 (499) 517-8899
1.7	Fax number of the Company	+7 (499) 517-7235
1.8	E-mail address of the Company	postman@rosneft.ru
1.9.	Full name of the contact person responsible for maintenance of the List of Insiders of the Company	
1.10.	Telephone number of the contact person responsible for maintenance of the List of Insiders of the Company	
1.11.	E-mail address of the contact person responsible for maintenance of the List of Insiders of the Company	
1.12.	Category of insider to which the Company refers**	Issuer, Item 1 of Article 4 of Law 224-FZ

No.	II. Information on legal entities excluded from the List of Company's insiders	
2.1	Full corporate name of the Insider	
2.2	Tax ID (INN) of the Insider	
2.3	Primary State Registration Number (OGRN) of the Insider	
2.4.	Physical or mailing address of the Insider	

No.	III. Information on the grounds for notification	
3.1	Type of event of which the person is notified	Exclusion from the List of Insiders

3.2.	Date of the event of which the person is notified	
3.3.	Number of item (items) of Article 4 of Law 224-FZ according to which the person is excluded from the List of Insiders	i. __ of Article 4 of Law 224-FZ of 27.07.2010
3.4.	Grounds for excluding the person from the List of Insiders indicated in Item 2.8 of the Regulations***, or the number of the agreement with the individual excluded from the List of Insiders on termination of which the relevant person is excluded from the List of Insiders	

\_\_\_\_\_  
 (job title  
 of authorized person of the Company)

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

\_\_\_\_\_  
 (initials and surname)

STAMP HERE

Notes:

\* *The Company shall mean Rosneft.*

\*\* *The category (categories) of the insider to which the Organization refers is indicated in compliance with Article 4 of the Federal Law; additionally, in respect of each category, the number of item of Article 4 of the Federal Law and description of the category according to the Federal Law shall be specified .*

\*\*\* *The Regulations on procedure of notification of the persons of add to the List of Insiders and removal from such list approved by the Order of FFMS of Russia No. 13-51/pz-n dated 18.06.2013.*

## APPENDIX 5. FORM FOR INDIVIDUALS – NOTIFICATION OF TRANSACTIONS IN FINANCIAL INSTRUMENTS OF ROSNEFT PERFORMED BY INSIDER

to Rosneft  
26/1 Sofiyskaya Embankment,  
Moscow 117997 Russia

or

to Bank of Russia  
9 Leninsky Prospekt; GSP-1,  
Moscow, 119991

### FORM – for individuals

#### NOTIFICATION of transactions in financial instruments of Rosneft performed by Insider

1. Individual insider – full name	
2. Type and details of identification document of an insider – individual	Passport _____, issued by _____, on _____.
3. Place of registration of insider – individual	
4. Full brand name of the entity, for which the insider is included into the List of Insiders	Rosneft Oil Company, Public Joint Stock Company
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)	-



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19. Value of derivative contract settlement (to be specified for transactions with derivatives)	-
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(date)

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(signature)

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(printed name)

*Notes:*

- \* *For example, purchase or sale of securities (ordinary shares).*
- \*\* *For example, PAO Moscow Exchange, over-the-counter market.*

## APPENDIX 6. FORM FOR LEGAL ENTITIES – NOTIFICATION OF TRANSACTIONS IN FINANCIAL INSTRUMENTS OF ROSNEFT PERFORMED BY INSIDER

to Rosneft  
26/1 Sofiyskaya Embankment,  
Moscow 117997 Russia

or

to Bank of Russia  
9 Leninsky Prospekt; GSP-1,  
Moscow, 119991

### FORM – for legal entities

#### NOTIFICATION of transactions in financial instruments of Rosneft performed by Insider

1. Full legal name of the Insider – legal entity	
2. Tax ID (INN), Primary State Registration Number (OGRN) of the Insider – legal entity	
3. Registered address of the Insider – legal entity	
4. Full brand name of the entity, for which the insider is included into the List of Insiders	Rosneft Oil Company, Public Joint Stock Company
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 Oil Company, Public Joint Stock Company
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)	
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(date)

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(signature)

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(printed name)

Notes:

\* For example, purchase or sale of securities (ordinary shares).

\*\* For example, PAO Moscow Exchange, over-the-counter market.