

ROSNEFT INSIDER'S HANDBOOK



INSIDER

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

INSIDER IS OBLIGED TO

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

INSIDER IS PROHIBITED TO

- disclose the known insider information
- use insider information in personal purposes or in the interests of 3d parties
- transfer insider information to another person in purposes unrelated to performance of the duties established by the federal laws or work duties, contract performance
- recommend based on insider information 3d persons to perform transactions with Rosneft's financial instruments
- perform actions that constitute market manipulation
- perform transactions with financial instruments of Rosneft:
 - from the 15th calendar day of the 1st month of the quarter till the date of disclosure of consolidated financial statements for the preceding quarter inclusive
 - within 30 calendar days from the day of purchase of financial instruments for the cases of their subsequent sale

INSIDER INFORMATION

(has simultaneously the following features)

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

INSIDER INFORMATION IS DISCLOSED ON

- Rosneft website and on Interfax-TsRKI news feed (<http://www.e-disclosure.ru>)

LIST OF INFORMATION RELATED TO ROSNEFT INSIDER INFORMATION IS

- formed taking into account of the specifics of Rosneft operations
- including the list of information set forth by the Bank of Russia
- approved by Rosneft Order dated 26.02.2022 No.94
- public information and published on official website of Rosneft in the section For Investors and Shareholders / Insiders

INTERNAL DOCUMENT ON INSIDER INFORMATION

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

CONTACTS

- insiders@rosneft.ru