

**LIST OF DATA CONSTITUTING
INSIDER INFORMATION OF ROSNEFT**

Insider information of Rosneft - an issuer whose emission securities are admitted to organized trading or in respect of the emission securities of which an application for admission to organized trading in the Russian Federation has been submitted, includes the following information¹:

1. on convocation and holding the General Shareholders Meeting of Rosneft, and on decisions taken by the General Shareholders Meeting of Rosneft;
2. on holding the Meeting of the Board of Directors of Rosneft and on the agenda thereof;
3. on taking by the Board of Directors of Rosneft the following decision:
 - 3.1. on election (re-election) of the Chairman of the Board of Directors of Rosneft and, in case of his absence, on the member of the Board of Directors of Rosneft performing the functions of the Chairman of the Board of Directors of Rosneft;
 - 3.2. on proposing to the General Shareholders Meeting of Rosneft to set a certain record date in the decision regarding dividends payment (declaration);
 - 3.3. on placing emission securities of Rosneft in organized trading;
 - 3.4. on determining the price of placement of Rosneft shares in organized trading;
 - 3.5. on determining the buy back price of Rosneft shares;
 - 3.6. on acquisition by Rosneft of emission securities placed by it in organized trading;
 - 3.7. on formation of the executive body of Rosneft and on early termination (suspension) of its powers, including the powers of a managing organization or a manager;

¹ Subject to disclosure in accordance with the procedure and terms established by Directive of the Bank of Russia No. 5326-U dated 21.11.2019 "On the List of Insider Information of Legal Entities Specified in Paragraphs 1, 3, 4, 11 and 12 of Article 4 of Federal Law No. 224-FZ of 27 July 2010 "On Countering the Misuse of Insider Information and Market Manipulation and on Amendments to Certain Legislative Acts of the Russian Federation", as well as on the procedure and Terms of its disclosure".

3.8. on recommendations regarding the amount of dividends on Rosneft shares, and the procedure for their payment;

3.9. on consent to or subsequent approval of transactions recognized in accordance with the legislation of the Russian Federation as major transactions and (or) related party transactions;

3.10. on approval of the agenda of the General Shareholders Meeting of Rosneft, as well as on other decisions related to the preparation, convening and holding of the General Shareholders Meeting of Rosneft;

3.11. on submission to the General Shareholders Meeting of Rosneft of the issues (on the proposal to the General Shareholders Meeting of Rosneft to make decisions on the issues) specified in Subclauses 2, 6 and 14-19 of Clause 1 of Article 48 of Federal Law dated 26.12.1995 No. 208-FZ " On Joint-Stock Companies" (hereinafter - the Federal Law "On Joint Stock Companies"), as well as the issue (on the issue) regarding the transfer of the powers of the sole executive body of Rosneft to a managing organization or a manager;

3.12. on recommendations concerning the received by Rosneft voluntary, including competing, or mandatory offer provided for by Chapter XI of the Federal Law "On Joint Stock Companies”;

4. on facts of non-taking by the Board of Directors of Rosneft the following decisions:

4.1. on convocation of the General Shareholders Meeting of Rosneft as well as on other decisions related to preparation, convocation and holding the General Shareholders Meeting of Rosneft;

4.2. on convocation or on refusal to convene an extraordinary General Shareholders Meeting of Rosneft, on demand of the Auditing Commission of Rosneft, the auditor of Rosneft or a shareholder (shareholders) who is (are) holder(s) of at least 10 (ten) percent of the voting shares of Rosneft.

4.3. on inclusion of or on refusal to include the moved issues in the agenda of the General Shareholders Meeting of Rosneft, and the proposed nominees - in the list of candidates for voting on elections to the respective body of Rosneft, who have been proposed by a shareholder (shareholders) who in aggregate holds (hold) at least 2 (two) percent of the voting shares of Rosneft;

4.4. on formation of the sole executive body of Rosneft at 2 successive meetings of the Board of Directors of Rosneft or within 2 months of the date of termination or expiry of the powers of the earlier formed sole executive body of Rosneft in the case provided for by Clause 6 of Article 69 of Federal Law dated 26.12.1995 No. 208-FZ “On Joint Stock Companies”;

4.5. on early termination of the powers of the sole executive body of Rosneft at 2 (two) successive meetings of the Board of Directors of Rosneft in the case provided for by Clause 7 of Article 69 of Federal Law dated 26.12.1995 No. 208-FZ “On Joint Stock Companies”;

4.6 on convening (holding) an extraordinary General Shareholders Meeting of Rosneft if the number of the Rosneft Board members becomes less than the number forming the quorum for holding a meeting of the Board of Directors of Rosneft;

4.7. on forming a temporary sole executive body of Rosneft and holding an extraordinary General Shareholders Meeting of Rosneft for resolving the issue of early termination of the powers of its sole executive body or managing company (manager) and on forming a new sole executive body of Rosneft, or on transfer of the powers of its sole executive body to the managing company (manager), if the Board of Directors of Rosneft takes a decision on suspending the powers of its sole executive body or the powers of the managing company (manager);

4.8. on recommendations in respect of the received by Rosneft voluntary proposal, including a competing one, or mandatory proposal provided for by Chapter XI of the Federal Law “On Joint Stock Companies”, including the evaluation of the proposed price of the acquired emission securities and potential change of their market value after the acquisition, assessment of the plans of the person who has sent the voluntary proposal, including a competing one, or a mandatory proposal in respect of Rosneft, in that number concerning employees thereof;

5. on the emergence of a controlled entity of Rosneft that is of significant importance to it, as well as on ceasing of the grounds for control over such entity;

A controlled entity (controlled organization) is a legal entity under direct or indirect control of the controlling person (Article 2 of Federal Law dated 22.04.1996 No. 39-FZ “On Securities Market”).

Controlled by Rosneft organizations of significant importance to it are organizations controlled by Rosneft, each of which accounts for at least 5 percent of the consolidated assets value or at least 5 percent of the consolidated income, determined as per the data of the latest consolidated financial statements of Rosneft, other organizations controlled by Rosneft which in its opinion have significant impact on the financial standing, financial performance and changes of financial situation of the group of companies that Rosneft and its controlled entities are part of (based on Clause 18.3.1 of Regulations of the Bank of Russia dated 30.12.2014 No. 454-P “On disclosure of information by issuers of emission securities”).

6. on the emergence of an entity controlling Rosneft, as well as on ceasing of the grounds for such control;

7. on taking a reorganization or liquidation decision by a company controlling Rosneft, controlled by Rosneft and being of significant importance to it, or by a grantor of security on Rosneft bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted);

8. on appearance at Rosneft, its controlling entity, an entity controlled by Rosneft, which is of significant importance to it, or a grantor of security on Rosneft bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted), of features pointing to its insolvency (bankruptcy) envisaged by the insolvency (bankruptcy) laws of the Russian Federation;

Controlling person – a person who has the right, directly or indirectly (through persons under his control), to dispose, by virtue of participation in a controlled organization Rosneft and (or) on the basis of asset trust management agreements, and (or) simple partnership agreements, and (or) agency agreements, and (or) a shareholder agreement, and (or) other agreement, the subject of which is the exercise of rights certified by shares (stakes) of a controlled organization (Rosneft), of more than 50 percent of the votes in the supreme governing body of the controlled organization (Rosneft) or the right to appoint (elect) the sole executive body and (or) more than 50 percent of the members of the collegial governing body of the controlled organization (Rosneft) (on the basis of Article 2 of Federal Law No. 39-FZ of 22.04.1996 "On the Securities Market").

9. on accepting by an arbitration court of an application for recognising Rosneft, its controlling entity, an entity controlled by Rosneft, which is of significant importance to it, or a grantor of security on Rosneft bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted), and on taking by an arbitration court of a decision on recognising the aforementioned entities bankrupt, on initiation of one of the bankruptcy proceedings in respect of them, on termination of bankruptcy proceedings in respect of them;

10. on bringing an action against Rosneft, its controlling entity, an entity controlled by Rosneft, which is of a significant importance to it, or against a grantor of security on Rosneft bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted), with the amount of claims equal to or exceeding 10 percent of the book value of the aforementioned entities' assets as of the end date of the last completed reporting period preceding such action;

11. on the date on which persons shall be determined who are entitled to exercising their rights to Rosneft's emission securities admitted to organized trading (in respect of which an application for admission to organized trading has been submitted), including on the date on which the list of persons having the right to take part in the General Shareholders Meeting of Rosneft shall be made;

12. on the stages of the procedure for emission of Rosneft securities admitted to organized trading (in respect of which an application for admission to organized trading has been submitted);

13. on suspension or resumption of the emission of Rosneft securities admitted to organized trading (in respect of which an application for admission to organized trading has been submitted);

14. on the recognition as failed or invalid of the issue (additional issue) of Rosneft emission securities admitted to organized trading (in respect of which an application for admission to organized trading has been submitted);

15. on the redemption of Rosneft emission securities admitted to organized trading (in respect of which an application for admission to organized trading has been submitted);

16. on accrued and (or) paid income on Rosneft emission securities admitted to organized trading (in respect of which an application for admission to organized trading has been submitted);

17. on entering by Rosneft into an agreement with the Russian trade organizer on the inclusion of Rosneft emission securities in the list of securities admitted to organized trading by the Russian trade organizer, as well as an agreement with the Russian exchange on the inclusion of Rosneft emission securities in the quotation list of the Russian exchange;

18. on the inclusion of Rosneft securities in the list of securities admitted to organized trading by the Russian trade organizer, or on their exclusion from the specified list, as well as on the inclusion of Rosneft securities in the quotation list of the Russian securities exchange or on their exclusion from the specified list;

19. on the inclusion of Rosneft emission securities or securities of a foreign issuer certifying rights in respect of Rosneft emission securities in the list of securities admitted to trading on a foreign organized (regulated) financial market, and on the exclusion of such securities from the specified list, as well as on the inclusion in the quotation list of a foreign exchange of such securities or on their exclusion from the specified list;

20. on entering by Rosneft into an agreement on the maintenance (stabilization) of prices for Rosneft emission securities (securities of a foreign issuer certifying rights in respect of Rosneft emission securities) admitted to organized trading (in respect of which an application for admission to organized trading has been submitted), as well as on the termination of such an agreement;

21. on the submission by Rosneft of the application for obtaining the permission of the Bank of Russia for placement and (or) organization of the circulation of Rosneft

emission securities outside the Russian Federation, and also on obtaining the specified permission by it;

22. on the non-performance by Rosneft of obligations to holders of its emission securities admitted to organized trading;

23. on the acquisition or termination by a person of the right, directly or indirectly (through persons controlled by him), independently or jointly with other persons connected with him by an asset trust management agreement, and (or) a simple partnership agreement, and (or) an agency agreement, and (or) a shareholder agreement, and (or) other agreement, the subject of which is the exercise of the rights certified by Rosneft shares, to dispose of a certain number of votes attributable to voting shares constituting the authorized capital of Rosneft, if the specified number of votes is 5 percent or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attributable to voting shares constituting the authorized capital of Rosneft;

24. on a voluntary, including competing, or mandatory offer received by Rosneft in accordance with Chapter XI. 1 of the Federal Law "On Joint Stock Companies" for the acquisition of its emission securities admitted to organized trading (in respect of which an application for admission to organized trading has been submitted), as well as on changes made to these offers;

25. on the notification received by Rosneft in accordance with Chapter XI. 1 of the Federal Law "On Joint Stock Companies" regarding the right to demand the repurchase of Rosneft emission securities admitted to organized trading (in respect of which an application for admission to organized trading has been submitted), or a request for the repurchase of Rosneft emission securities admitted to organized trading (in respect of which an application for admission to organized trading has been submitted);

26. on the detection of errors in previously disclosed or provided accounting (financial) statements of Rosneft;

27. on effecting by Rosneft or a grantor of security on the Rosneft bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted) of the transaction, the amount of which, as of the end date of the reporting period (quarter, year) preceding the transaction, is 10 or more percent of the book value of the assets of Rosneft or the specified person, in respect of which the established deadline has expired for the submission of accounting (financial) statements (the last completed reporting period preceding the transaction);

28. on effecting by Rosneft controlling entity or Rosneft controlled entity that is of significant importance to it of a transaction which is recognized as a major transaction in accordance with the legislation of the Russian Federation;

29. on effecting by Rosneft of a related party transaction, if the amount of such transaction is 1 or more percent of the book value of the Rosneft assets as of the end date of the last completed reporting period preceding the decision to consent to the transaction by the authorized governing body of Rosneft, or if the decision to consent to the transaction was not made – as of the end date of the last completed reporting period preceding the conclusion of such transaction by Rosneft;

30. on the alteration to the composition and (or) size of the subject of a pledge on the Rosneft bonds backed by pledge collateral admitted to organized trading (in respect of which an application for admission to organized trading has been submitted), and in the case of alteration to the composition and (or) size of the subject of a pledged on the Rosneft mortgage-backed bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted) – information about such alterations, if they are caused by the replacement of any mortgage-backed claim that constitutes the mortgage collateral of the bonds, or the replacement of other property that constitutes the mortgage collateral of the bonds, the value (monetary valuation) of which is 10 or more percent of the amount of the mortgage collateral of the bonds;

31. on the change in the value of the assets of the grantor of security on the Rosneft bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted), which amounts to 10 or more percent of the book value of the assets of such person;

32. on the acquisition by Rosneft or the termination of the Rosneft right, directly or indirectly (through persons controlled by it), independently or jointly with other persons bound with Rosneft by an asset trust management agreement, and (or) a simple partnership agreement, and (or) an agency agreement, and (or) a shareholder agreement, and (or) other agreement, the subject of which is the exercise of the rights certified by the shares (stakes) of the organization, the issue securities of which are admitted to organized trading, to dispose of a certain number of votes attributable to voting shares (stakes), constituting the authorized capital of the specified organization, if the specified number of votes is 5 percent or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attributed to the voting shares (stakes) that make up the authorized capital of such an organization;

33. on concluding by Rosneft, its controlling person or by a company controlled by Rosneft of a contract providing for the obligation to acquire emission securities of Rosneft admitted to organized trading (in respect of which an application for admission to organized trading has been submitted);

34. on changing of the size of interest in the authorized capital of Rosneft and (or) its controlled organizations that are essential to it:

- of persons who are Rosneft Board members, Rosneft collegial executive body members, as well as of the person holding the position (performing the functions) of the sole executive body of Rosneft;
- of persons who are Board members (Advisory Board members), collegial executive body members in the managing company, as well as of the person holding the position (performing the functions) of the managing company's sole executive body in case where the authorities of the Rosneft sole executive body have been transferred to the managing company;

35. on emerging and (or) ceasing of the right of holders of the Rosneft bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted) to demand from Rosneft early redemption of such bonds;

36. on a dispute related to the creation of Rosneft, management of it or participation in it:

36.1 on the receipt of a notification of the intention to apply to the arbitration court with a petition (statement of claim);

36.2 on the initiation of proceedings by the arbitration court on the case and the acceptance of the petition (statement of claim) for hearing;

36.3 on changing the basis or subject of a previously filed claim;

36.4 on the adoption of interim measures;

36.5 on the rejection of a claim;

36.6. on the admission of a claim;

36.7 on entering into an amicable agreement;

36.8 on the adoption of a judicial act, which ends the consideration of the case in the arbitration court of first instance;

37. on lodging of claims related to the performance of obligations concerning the Rosneft bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted);

38. on the placement outside the Russian Federation of bonds or other financial instruments certifying debt obligations, the performance of which is carried out at the expense of Rosneft;

39. on the acquisition (alienation) of voting shares of Rosneft or securities of a foreign issuer certifying rights in respect of voting shares of Rosneft, by Rosneft and (or) Rosneft controlled organizations, with the exception of controlled organizations that are brokers and (or) trust managers and made a transaction on their own behalf, but at

the expense of a client who is not Rosneft and (or) its controlled organization;

40. on information sent or provided by Rosneft to a body (organization) of a foreign state, a foreign exchange and (or) other organizations in accordance with foreign law for the purposes of its disclosure or provision to foreign investors in connection with the placement or circulation of Rosneft emission securities outside the Russian Federation, including through the acquisition of securities of a foreign organization that are being (have been) placed in accordance with foreign law;

41. on the conduct and agenda of the General Meeting of holders of Rosneft bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted), as well as on the decisions taken by the general meeting of holders of such Rosneft bonds;

42. on the determination by Rosneft of the bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted), a new representative of the bondholders;

43. on the adoption by the authorized body of Rosneft of a decision on refusing to place Rosneft emission securities admitted to organized trading (in respect of which an application for admission to organized trading has been submitted);

44. information constituting the consolidated financial statements of Rosneft and the interim consolidated financial statements of Rosneft for the reporting period consisting of three, six and nine months of the reporting year, as well as the information contained in the audit opinions prepared in relation to these statements or in other document prepared as following the audit if the interim consolidated financial statements in accordance with the auditing standards;

45. information contained in the annual reports of Rosneft, except for information that has already been disclosed;

46. information constituting the annual accounting (financial) statements of Rosneft, as well as information contained in the audit opinions prepared in relation to these statements;

47. information contained in the quarterly reports of Rosneft, except for the information that has already been disclosed;

48. information constituting the interim accounting (financial) statements of Rosneft for the reporting period consisting of three, six or nine months of the reporting year, as well as the information contained in the audit opinions prepared in relation to these statements, if an audit has been conducted in relation to these statements;

49. information contained in the report (notification) on the results of the issue (additional issue) of Rosneft emission securities admitted to organized trading (in respect of which an application for admission to organized trading has been submitted),

with the exception of information that has already been disclosed;

50. information contained in the prospectus of Rosneft emission securities, which are subject to placement in organized trading in accordance with the decision of the Board of Directors of Rosneft, with the exception of information that has already been disclosed;

51. on the conclusion by Rosneft of a strategic partnership agreement or other agreement, with the exception of the agreements provided for in paragraphs 17, 20, 27-29 of this List, if the conclusion of such an agreement may have a significant impact on the price of Rosneft emission securities admitted to organized trading (for which an application for admission to organized trading has been submitted);

52. on the adoption by a court, arbitration court, Federal Bailiff Service of interim measures (including the imposition of seizure) in respect of funds or other property belonging to Rosneft, its controlling organization, or a Rosneft controlled organization that is of significant importance to it, or to a grantor of security on Rosneft bonds that is not a Russian Federation that provided a state guarantee of the Russian Federation, a constituent entity of the Russian Federation that provided a state guarantee of a constituent entity of the Russian Federation, or a municipal entity that provided a municipal guarantee on Rosneft bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted), amounting to 10 or more percent of the book value of the assets of these persons as of the end date of the last completed reporting period preceding the adoption of interim measures;

53. on the acquisition by a person of a right or termination of a person's right directly or indirectly (through persons controlled by him) independently or jointly with other persons related to him by an asset trust management agreement, and (or) a simple partnership agreement, and (or) an agency agreement, and (or) a shareholder agreement, and (or) other agreement, the subject of which is the exercise of rights certified by shares (stakes) of the organization that provided a surety, guarantee or pledge on Rosneft bonds admitted to organized trading (in respect of which an application for admission to organized trading is filed), if the person who has provided such a surety, guarantee or pledge on such bonds is not the Russian Federation that has provided a state guarantee of the Russian Federation, a constituent entity of the Russian Federation that has provided a state guarantee of a constituent entity of the Russian Federation, or a municipal entity that has provided a municipal guarantee on Rosneft bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted), to dispose of a certain number of votes attributable to voting shares (stakes) constituting the authorized capital of the specified organization, if the specified number of votes is 5 percent or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attributable to the voting

shares (stakes) that make up the authorized capital of the specified organization;

54. information on the initiation of a criminal case (received from preliminary investigation agencies or agency of inquiry) against a member of the Board of Directors of Rosneft, a sole executive body of Rosneft, controlling organization of Rosneft, a controlled organization of Rosneft that is of significant importance to it, or a grantor of security on Rosneft bonds admitted to organized trading (in respect of which an application for admission to organized trading has been submitted).