

INSIDER'S HANDBOOK (FOR ROSNEFT INSIDERS)



INSIDER:

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

INSIDER IS OBLIGED:

- to comply with the legislative requirements and Rosneft's internal document on insider information
- to inform on operations performed with the financial instruments of PJSC Rosneft on the Company's request
- to inform on holding Rosneft securities within 7 working days after inclusion in the List of Insiders
- to comply with the procedure of performing transactions in financial instruments of Rosneft
- to notify about changing of profile for the List of Insiders

INSIDERS ARE PROHIBITED:

- to disclose the insider information that is known to them
- to use insider information for personal purposes or in the interests of 3d parties as well as for performance of operations with Rosneft's financial instruments at their expense or at a 3d party's expense, with exception of the cases provided for by Rosneft's internal document on insider information
- to transfer insider information to another person, with exception of cases where such information is transferred to a person included in the List of Insiders, in connection to performance of the duties established by the federal laws or in connection to performance of work duties or contract performance
- based on insider information, to recommend to / oblige / encourage 3d persons to perform operations with Rosneft's financial instruments
- to perform actions that constitute market manipulation
- to perform transactions in 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
- dissemination (disclosure) may have a major impact on the value of Rosneft securities
- is contained in the List of Information Related to the Insider Information of the Company

INSIDER INFORMATION IS DISCLOSED:

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

LIST OF DATA CONSTITUTING INSIDER INFORMATION

- formed taking into account of activities of Rosneft, including the list of information set forth by the Bank of Russia
- approved by order of Rosneft No.214 of 24.05.2021
- constitutes public information and is placed on the Company's website in the section "For Investors and Shareholders / Insiders"

INTERNAL DOCUMENT ON INSIDER INFORMATION

- Rosneft Regulations "Internal control rules for the prevention, detection and suppression of illegal use of insider information in Rosneft and (or) market manipulation" No. P3-O1 R-0049 UL-001

CONTACTS

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