

APPROVED BY

Resolution of the Board of Directors of
Public Joint-Stock

Oil and Gas Company Slavneft

25.09.2020 (Minutes of Meeting No. 4
dd. 28.09.2020)

**REGULATIONS ON
THE INFORMATION POLICY OF
PUBLIC JOINT-STOCK
OIL AND GAS COMPANY SLAVNEFT
(amended)**

Moscow

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1. GENERAL PROVISIONS

- 1.1. These Regulations on the Information Policy of Public Joint-Stock Oil and Gas Company Slavneft (hereinafter referred to as the Regulations) have been developed in accordance with the law of the Russian Federation, Articles of Association of PJSC NGK Slavneft (hereinafter referred to as the Company), Company's internal policies and procedures, recommendations of the Corporate Governance Code, requirements to the information disclosure set forth by the Bank of Russia, and Listing Rules of PJSC Moscow Exchange, on which Company's securities are traded.
- 1.2. These Regulations are aimed to ensure the efficient information exchange between the Company, shareholders, investors and other concerned parties.
- 1.3. These Regulations define the information disclosure goals and principles of the Company, the information disclosure procedure, timeline and forms, the list of information and documents to be disclosed to the shareholders, investors and other concerned parties.
- 1.4. The goal of the Company's information policy is to address to the maximum extent the needs of shareholders, investors and other concerned parties in receiving the full, relevant and reliable information about the Company, which is material for them to make the reasonable investment and managerial decisions, and to ensure the free and unhindered access to this information.
- 1.5. These Regulations are binding on Company's employees and members of the Company's governing bodies.
- 1.6. Company's executive bodies are responsible for ensuring the implementation of these Regulations. The Company's Board of Directors shall control compliance with these Regulations.
- 1.7. Administrative documents, internal policies and procedures and other internal documents shall not contradict these Regulations.
- 1.8. Company's General Director shall be responsible for prompt disclosure of the information about the Company, for completeness and reliability of the disclosed information.
- 1.9. These Regulations do not regulate anyhow the relations related to Company's insider information.

2. TERMS AND DEFINITIONS

- 2.1. Company's accounting (financial) reporting is the information about Company's financial status as of the reporting date, profit and loss from

its activity and cash flow for the reporting period, which is systematized in accordance with requirements set forth by the law of the Russian Federation.

- 2.2. Company's consolidated financial reporting is the systematized information, which reflects the financial status, profit and loss from Company's activity and changes in the financial status of the Company, which is defined as a group with other organizations and (or) foreign organizations in accordance with the International Financial Reporting Standards.
- 2.3. Concerned parties are Company's partners and counterparties, industry and all-Russian business communities, non-profit and non-governmental / social organizations, educational institutions, as well as Company's employees, population and other persons interested in cooperation with the Company or dependent anyhow on the activity performed by the Company in the regions of its presence, except for public authorities and governing bodies.
- 2.4. Information policy is a complex of actions on disclosure of the information for its distribution among the shareholders, investors and other concerned parties in the scope, which is required for them to make the well-considered investment and managerial decisions or fulfill other actions, which may influence the Company's financial and business activity.
- 2.5. Company's official web-site is www.slavneft.ru in the Internet information and telecommunication network.
- 2.6. Company's employee is an individual engaged in employment relations with the Company.
- 2.7. Information disclosure means to ensure accessibility of the information for all concerned parties regardless of goals of this information receipt in line with the procedure, which guarantees its availability and receipt.
- 2.8. Mass media means the printed periodical, online media, TV channel, radio channel, TV program, radio program, video program, newsreel program, other form of the mass information periodical distribution, which has the permanent name.

3. MAIN PRINCIPLES OF THE COMPANY'S INFORMATION POLICY

- 3.1. Main principles of the Company's information policy are as follows:

- 3.1.1. Principle of regularity means continuous and systematic submission of the information about the Company to shareholders, investors and other concerned parties via the mass media accessible for the Company.
- 3.1.2. Principle of consistency means to ensure the information disclosure consistency.
- 3.1.3. Principle of promptness is to disclose as soon as possible the information about material events and facts, which may influence the Company's financial and business activity and which may affect interests of the shareholders, investors or other concerned parties, and to prevent the disclosed information relevancy reduction.
- 3.1.4. Principle of accessibility means Company's usage of different means for information distribution, which ensure the free, easy and cheapest access to the disclosed information for shareholders, investors and other concerned parties.
- 3.1.5. Principle of reliability means submission of the true information to shareholders, investors and other concerned parties, Company's control that the information disclosed by the Company is not misrepresented intentionally or is not mistaken.
- 3.1.6. Principle of completeness means submission of the information, which is sufficient for shareholders, investors and other concerned parties to generate the unprejudiced and fullest idea about the issues of Company's activity that are interested for them.
- 3.1.7. Principle of comparability is to ensure the disclosure of information about Company's activity, which does not contradict (complies with) the information earlier published by the Company, to ensure the consistency of information disclosed by the Company via different means and / or in different forms.
- 3.1.8. Principle of equality means to ensure equal rights and possibilities of information receipt for all shareholders in accordance with requirements of the Russian Federation law.
- 3.1.9. Principle of fairness / objectivity means to ensure the disclosure of information, which is material for shareholders, investors and other concerned parties, regardless of its impact on Company's activity. When reporting about its activity, the Company shall not evade the disclosure of negative information about it, which is material for shareholders, investors and other concerned parties.
- 3.1.10. Principle of balance means to ensure the reasonable balance between information transparency, on the one hand, and protection of the

commercially important and other confidential information, on the other hand.

- 3.1.11. Principle of protectability means to apply the methods and means set forth by the law of the Russian Federation to protection of the information, which is the state, business, trade secret and personal data.

4. INFORMATION DISCLOSURE

- 4.1. The Company shall promptly and properly comply with requirements to mandatory disclosure of the information set forth by the effective law, regulators and market operators for ensuring the transparency of its activity for shareholders, investors and other concerned parties.
- 4.2. The Company shall avoid the “tick-box” approach to information disclosure and shall disclose the material information about its activity, even if the disclosure of such information is not envisaged by the law, but within the scope defined by the law of the Russian Federation and Company’s internal documents, which regulate the work with documents that include the state, trade secret, as well as the information with restricted access.
- 4.3. The Company shall disclose the following types of information in the forms set forth by requirements of the effective law, regulators and market operators:
- Company’s Articles of Association and internal documents, which regulate the activity of Company’s governing bodies;
 - information related to holding the general meetings of Company’s shareholders;
 - Company’s annual report;
 - Company’s annual accounting (financial) reporting for the last completed reporting year with the audit opinion on such reporting attached thereto;
 - Company’s interim accounting (financial) reporting for the last completed reporting period, which covers three, six or nine months of the reporting year;
 - Company’s annual consolidated accounting (financial) reporting for the last completed reporting year with the audit opinion on such reporting attached thereto;
 - Company’s interim accounting (financial) reporting for the last completed reporting period, which covers three, six or nine months of the reporting year;
 - Company’s interim consolidated financial reporting for the completed reporting period;

- issuer's reports;
 - securities prospectus;
 - corporate action notices;
 - information, which may have a crucial impact on the price of Company's securities;
 - list of Company's affiliates;
 - information about the Company's dividend policy;
 - information and documents disclosed at stages of the procedure for issue of Company's securities;
 - additional information envisaged by statutory enactments of the Bank of Russia;
 - other forms envisaged by the law.
- 4.4. Information disclosure in the securities market is regulated by the effective law and other statutory enactments, Company's Articles of Association, Company's policies and procedures related to the information disclosure.
- 4.5. The list of information to be disclosed as per this Section can be changed in accordance with amendments to the law of the Russian Federation, rules and requirement of the Russian Federation Central Bank.
- 4.6. The information (documents) about the Company shall be disclosed by distributing the information as follows:
- publishing the information in the Internet, in the Company's official web-site, in the web-site of a securities market information provider, i.e. an information agency, which is entitled to carry out the actions on information disclosure in the securities market in line with the established procedure;
 - providing the shareholders with an access to the information (documents) and submitting the copies of documents upon their request in cases set forth by the law of the Russian Federation and Company's internal documents;
 - other methods.

5. PROCEDURE FOR INFORMATION SUBMISSION TO SHAREHOLDERS AND OTHER CONCERNED PARTIES

- 5.1. Main types of the information submitted to Company's shareholders are the information (files) submitted to the persons who are entitled to participate in the general meeting of Company's shareholders, and other information (documents) submitted upon request of Company's

shareholders in accordance with Article 91 of Federal Law No.29-FZ “Regarding Joint-Stock Companies” dd. 26.12.1995.

- 5.2. The notification on holding the general meeting of Company’s shareholders shall be published / placed within the timeline and pursuant to the procedure set forth by the law, Company’s Articles of Association and Company’s Regulations on the General Shareholders Meeting.
- 5.3. The list of information (files) submitted to the persons, who are entitled to participate in the general meeting of Company’s shareholders, and the procedure of access thereto shall be defined in accordance with the resolution of the Company’s Board of Directors, which the Board passes in the course of preparation to holding the general meeting of Company’s shareholders as per the procedure set forth by the law, Company’s Articles of Association, Company’s policies and procedures.
- 5.4. The information (files) to be submitted in the course of preparation to holding the general shareholders meeting shall be posted in the Company’s official web-site in the Internet (www.slavneft.ru). The specified information (files) shall also be available for the persons participated in the general shareholders meeting in the course of its holding.
- 5.5. When preparing to the general shareholders meeting, the Company shall ensure the possibility for shareholders to receive the electronic notification on holding the general shareholders meeting and the soft copy of information (files) to be submitted in the course of preparation thereto upon shareholder’s application.
- 5.6. The Company shall provide the shareholders with an access to the documents envisaged by Article 91 of Federal Law No.29-FZ “Regarding Joint-Stock Companies” dd. 26.12.1995.
- 5.7. The procedure and timing of fulfilling shareholders’ requests to ensure an access to Company’s documents, including documents with the confidential information about Company’s activity therein, ensuring such an access and copying such documents shall be set forth by the law, Company’s policies and procedures.
- 5.8. The procedure and timing of fulfilling requests of other concerned parties on receipt of Company’s documentation copies and submitting such copies shall be defined in accordance with paragraph 15, Article 30 of Federal Law No.39-FZ “Regarding the Securities Market” dd. 22.04.1996, Company’s policies and procedures.

6. PROCEDURE FOR INFORMATION SUBMISSION TO MEMBERS OF THE COMPANY'S BOARD OF DIRECTORS

- 6.1. The Company shall submit to the Board of Directors members the information and documents required for them to make reasonable and substantiated decisions on issues included into the agenda of the Board meeting.
- 6.2. Board members are entitled to request the submission of additional information related to the activity of the Company and its affiliates.
- 6.3. The secretary of the Company's Board of Directors submits to the Board member the information prepared in accordance with his / her request.

7. INFORMATION DISCLOSURE TO COMPANY'S REPRESENTATIVES

- 7.1. The General Director and his / her deputies are entitled for public presentation of issues related to the Company's activity.
- 7.2. The General Director is entitled to assign to Company's employees to make the public presentation (submit the information) on behalf of the Company at conferences, meetings, seminars and other public events in Russia and abroad.
- 7.3. It is not allowed to comment on rumors and assumptions as per the Company's information policy.

8. CONFIDENTIAL INFORMATION

- 8.1. The confidential information is the information with restricted access, including the information of any nature (operational, technical, economical, organizational and other), inter alia the information about results of the intellectual activity in the scientific and technical area, as well as the information about methods of the professional activity, which has the actual or potential commercial value, since it is not known to third parties, to which third parties do not have the free access on legal grounds, which include no state secret.
- 8.2. Company's General Director shall approve the list of information, which constitutes the trade secret, and other confidential information, define the procedure for handling with the confidential information and actions for protection thereof, determine the persons who shall control adherence to the established procedure for handling with the confidential information.
- 8.3. The Company shall record the persons, who have obtained an access to the confidential information, and the persons, to whom such information has been submitted or handed over.

- 8.4. Responsibility for disclosure of the Company's confidential information shall be regulated by the civil and criminal laws of the Russian Federation.

9. VALIDITY PERIOD AND PROCEDURE FOR AMENDMENTS THERETO

- 9.1. These Regulations are the Company's internal regulatory document of a continuous validity.
- 9.2. These Regulations shall be approved, deemed to be invalid and amended upon resolution of the Company's Board of Directors.
- 9.3. Amendments to these Regulations are made in case of any changes in the Russian Federation law on regulating the activity with mass media, information technology and advertisement, on information disclosure in the securities market, in case of change in the Company's public status, Company's organization structure or powers of its senior officials, and etc.
- 9.4. These Regulations, as well as all amendments and supplements thereto shall come into force from the date of their approval by the Company's Board of Directors.
- 9.5. The Regulations on Information Policy of Open Joint-Stock Oil and Gas Company Slavneft approved by the Board of Directors on December 06, 2006 with all further amendments and supplements thereto shall become null and void from the date of entry of these Regulations into force.
- 9.6. If individual rules of these Regulations contradict the law and/ or Company's Articles of Association, they shall become null and void, and respective rules of the law and / or Company's Articles of Association shall be applied. Invalidity of individual rules of these Regulations shall not entail the invalidity of other rules of these Regulations and the Regulations in their entirety.