

APPROVED BY  
the Resolution of the Board of Directors  
of SLAVNEFT  
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## **SLAVNEFT'S REGULATIONS**

**Internal Audit Rules to Prevent, Identify and Restrain the Unauthorized Use  
of Insider Information of Public Joint-Stock Oil and Gas Company Slavneft  
and / or Market Manipulation**

Moscow

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## **1. GENERAL PROVISIONS**

- 1.1. These Regulations “Internal Audit Rules to Prevent, Identify and Restrain the Unauthorized Use of Insider Information of Public Joint-Stock Oil and Gas Company Slavneft and / or Market Manipulation” (hereinafter referred to as the Rules) have been developed in accordance with Federal Law No.224-FZ “Regarding Counteraction against the Unauthorized Use of Insider Information and Market Manipulation and Amendments in Dedicated Legal Acts of the Russian Federation” dated July 27, 2010 (hereinafter referred to as the Law) and regulations of the Bank of Russia enacted pursuant thereto.
- 1.2. These Rules are focused on preventing, identifying and restraining the unauthorized use of insider information of Public Joint-Stock Oil and Gas Company Slavneft (hereinafter referred to as the Company) and / or manipulation of the Company’s market based on the insider information.
- 1.3. These Rules include:
  - rules for classifying the data as Company’s insider information;
  - rules for classifying the individuals/entities as Company’s insiders;
  - the procedure for access to the insider information, rules for protection of the insider information confidentiality and for monitoring the compliance with requirements of the Law and Bank-of-Russia regulations enacted pursuant thereto;
  - the procedure for maintaining the list of Company’s insiders, for notifying the individuals/entities about recoding of their names in the list of insiders and about deletion thereof from this list;
  - the procedure and timeline for insider information disclosure;
  - the procedure for making transactions with Company’s financial instruments by Company’s insiders, including the procedure for informing about transactions made with Company’s financial instruments by Company’s insiders;
  - rules for monitoring Company’s compliance with requirements of the Russian Federation Law regarding counteraction against the unauthorized use of insider information.

## **2. TERMS AND DEFINITIONS**

- 2.1. The following definitions are used in these Rules:
  - 2.1.1. Insider Information is the accurate and specific information (including the data that constitute the commercial secret, business secret or other secret protected by the law), which has not been distributed and which distribution may have a crucial impact on the cost of Company’s securities, and the information that is recorded in the List of data to be classified as Company’s insider information. The list of data to be classified as Company’s insider information shall be approved by the Company’s General Director.
  - 2.1.2. Information Submission means actions aimed at obtaining the information by a scope of definite persons in accordance with the Russian Federation Law on Securities.
  - 2.1.3. Information Distribution means actions, which are:
    - 1) aimed at obtaining the information by a scope of unspecified persons or at submitting the information to a scope of unspecified persons, inter alia, via information disclosure in accordance with the Russian Federation Law on Securities;

- 2) related to publishing the information in mass media, inter alia, in electronic, information and telecommunication networks, access to which is not limited by a scope of definite persons, including the Internet information and telecommunication network;
  - 3) related to information distribution via electronic, information and telecommunication networks, access to which is not limited by a scope of definite persons, including the Internet information and telecommunication network.
- 2.1.4. Insiders are individuals and / or legal entities, who/ which have gained access to the insider information due to different grounds. The dedicated list of insiders shall be determined in accordance with the List of Company's Insiders.
  - 2.1.5. Related Parties are persons, who are near related or related by marriage to an official/ employee, such as parents (including adoptive parents), children (including adopted children), full-blood and half-blood brothers (including cousins), sisters (including cousins), grandmothers, grandfathers, grandchildren, spouses, as well as parents (including adoptive parents), children (including adopted children), brothers (including cousins), sisters (including cousins), grandmothers, grandfathers and grandchildren of the spouses, children's spouses, children (including adopted children) and spouses of the full-blood and half-blood brothers and sisters.
  - 2.1.6. List of Company's Insiders means the Company's document, which includes the data about Company's insiders (including personal data of individuals) and which the Company permanently maintains. This List is drafted in accordance with requirements specified in Article 9 of the Law.
  - 2.1.7. Market Manipulation means willful acts, which are defined in the Russian Federation Law on Counteraction against the Unauthorized Use of Insider Information and Market Manipulation or in regulations of the Bank of Russia and due to which the price, demand, offer or trading volume of Company's securities deviates from the level, which could have been established without such actions, or keeps at the level, which significantly differs from the level, which could have been established without such actions.
  - 2.1.8. Controlled Party (Controlled Entity) is a legal entity that is directly or indirectly controlled by the Company.
  - 2.1.9. Internal Auditor is the Company's structural unit, which is in charge for controlling Company's compliance with requirements of the Russian Federation Law on Counteraction against the Unauthorized Use of Insider Information and Market Manipulation pursuant to the order of the General Director.
  - 2.1.10. Authorized Structural Unit is the Company's structural unit that is responsible for maintaining the List of Company's Insiders, notifying the individuals/entities about recording of their names (deletion thereof) in (from) the List of Company's Insiders, submitting the List of Company's Insiders to the trading authorities and to the Bank of Russia upon their request pursuant to the order of the General Director.
  - 2.1.11. Company's Official Web-Site is the Company's web-site ([www.slavneft.ru](http://www.slavneft.ru)) in the Internet information and telecommunication network.
  - 2.1.12. RSS News Feed is an informational resource that is updated in the on-line mode and that is submitted by the information agency, which is authorized to implement the

information disclosure actions in the securities market as per the contract with the Company.

2.1.13. Company's Financial Instruments mean shares, bonds or their derivatives.

2.1.14. Transactions with Financial Instruments mean to make transactions/ deals and other actions, which are focused on purchase, carve-out, other change of the right to financial instruments, as well as other actions for assuming liabilities to make the specified actions, inter alia, to place applications (to issue commissions) or to cancel such applications.

### **3. INSIDER INFORMATION**

3.1. Company's Insider Information includes:

3.1.1. the information from the list that shall be approved by the Bank-of-Russia regulation;

3.1.2. the information that is drafted in accordance with provisions of the Law and in accordance with special aspects of the Company's activity, that is not included into the insider information list approved by the Bank of Russia and is included into the List of data to be classified as Company's Insider Information.

3.2. The following information is not deemed to be the Company's Insider Information:

1) the data that have become available to the public, including due to distribution of this information;

2) studies, forecasts and assessments with regard to Company's Financial Instruments made pursuant to the public data, as well as recommendations and/or proposals to effect transactions with Company's Financial Instruments made pursuant to the public data;

3) the information and/or data based thereon, which are submitted by the Company and/or the individual/ entity (individuals/ entities) involved by the Company to potential buyers, or which are used by the Company and /or the individual/ entity (individuals/ entities) involved by the Company to recommend to potential buyers or to prompt them in any other way to purchase Company's securities due to placing (arrangement of such placing) and/or offering (arrangement of such offering) of Company's issue-grade securities, provided that potential buyers are notified that such information (data) can be used by them only for making a decision on purchase of the placed (offered) securities.

3.3. The procedure for drafting and amending the List of data to be classified as Company's Insider Information is as follows:

3.3.1. structural units, which functions include the activity related to handling with Company's Insider Information, shall identify new types of the insider information in the Company and shall promptly submit proposals on recording such information into the List of data to be classified as Company's Insider Information to the Deputy General Director for Corporate Relations and General Issues;

3.3.2. new types of the insider information shall be recorded into the List of data to be classified as Company's Insider Information pursuant to the order of the General Director and the memorandum prepared by the Deputy General Director for Corporate Relations and General Issues.

#### **4. PROCEDURE AND TIMELINE FOR DISCLOSURE OF THE INSIDER INFORMATION**

- 4.1. The procedure and timeline for disclosure of the Insider Information, which list is approved by the Bank-of-Russia regulation, are determined in accordance with the Bank-of-Russia regulations, unless the Law envisages other procedure for disclosure of such information.
- 4.2. The following procedure and timeline for disclosure of the Company's Insider Information (certain types of the Insider Information), which is not included into the insider information list approved by the Bank of Russia, are determined:
  - 1) the text of the document with the Insider Information shall be posted in the Company's Official Web-Site within 2 (Two) days from the date of respective event occurrence and/or approval (signing) of the respective document by the Company's authorized body, and within 2 (Two) days from the date of drafting the minutes of meeting of the Company's authorized collegial body (date of expiring the period set forth by the Russian Federation Law for drafting such minutes of meeting), if such authorized body is a collegial body;
  - 2) a message about rules of access to the insider information shall be published in the RSS News Feed within 1 (One) day from the date of posting the text of the document with the Company's Insider Information in the Company's Official Web-Site;
  - 3) copies of the document with the Company's Insider Information shall be submitted upon request of a stakeholder within 7 (Seven) days from the date of request obtaining (submission) for a fee that shall not exceed expenses for making copies;
  - 4) if data included into the insider information are changed upon disclosure or submission of such information, the notification thereof shall be disclosed or submitted within the next business day after the day when such changes have become known or should have become known.
- 4.3. After publishing the information in the Internet, the Company shall ensure free and unhindered access to the Insider Information within 12 months at least from the date of its disclosure.
- 4.4. In accordance with these Rules, the following Insider Information shall not be disclosed:
  - 4.4.1. the information about decisions made by the Company's Board of Directors on the issues within the scope of its competence as per the Company's Articles of Association, if such information shall be treated as the Company's confidential information in line with the procedure set forth by the Company, except for the information about decisions made by the Company's Board of Directors on the issues within the scope of its competence as per the Russian Federation Law;
  - 4.4.2. terms and conditions of the contract on support (stabilization) of prices for Company's issue-grade securities, except for the information about the validity period of such contract.
- 4.5. In its own discretion, the Company shall assess availability of Company's legitimate interests, which can be breached by disclosure of the Insider Information.
- 4.6. The Company shall not disclose the information about future plans, which can be breached by preliminary disclosure of the information.

- 4.7. The Company may randomly submit the Insider Information to the persons for fulfilling their official, professional or job duties; and these persons shall keep the confidentiality of such information.
- 4.8. The following persons are related to the persons specified in paragraph 4.7 above:
- 1) Company's employees;
  - 2) Company's underwriters;
  - 3) Company's consultants;
  - 4) public authorities, which have respective powers in accordance with the Russian Federation Law;
  - 5) Company's creditors;
  - 6) rating agencies;
  - 7) persons with an access to the Insider Information due to holding of shares in the Company's authorized capital, or persons exercising the rights related to shares of the specified persons, as well as their representatives.
- 4.9. Company's employees, who are authorized for relations with the public and shareholders due to fulfilling their official duties, shall ensure equal opportunities for all stakeholders to obtain a simultaneous access to the disclosed material information about Company's activity, as well as shall take actions on rebutting of the inadequate information, if its distribution may cause damage to the Company, its business reputation/goodwill and shareholders.

## **5. RESTRICTIONS ON USE OF THE INSIDER INFORMATION**

- 5.1. It is prohibited to use the Insider Information for:
- 1) making transactions with Company's securities, to which the Insider Information is applicable, at your own expense or at the expense of the third party, except for making transactions with securities as part of performing the due obligation to purchase or sell Company's securities, if such obligation has arisen out of the transaction made before the individual/ entity became aware of the Insider Information;
  - 2) submitting such information to other individual/ entity, except for the cases of this information submission to the individual/ entity included into the List of Insiders for performing the obligations envisaged by the Russian Federation Law, or for fulfilling his /her job duties or for executing the contract;
  - 3) recommending, binding third parties or prompting them in any other way to purchase or sell Company's securities.
- 5.2. It is prohibited to manipulate the market.
- 5.3. Company's employees and other individuals/ entities with an access to the Insider Information are prohibited to distribute the misleading, wrongful or deceptive information, delay the Insider Information disclosure in case of no reasons therefor, as well take other misleading and deceptive actions, which may affect the cost of Company's securities.
- 5.4. In all cases, the persons specified in the Regulations on the Information Policy of Public Joint-Stock Oil and Gas Company Slavneft are entitled to make official and public statements about Company's operations on behalf of the Company.

- 5.5. Disclosure of the Insider Information by the person mentioned in paragraph 5.4 of these Rules in the form of official statement does not release the Company from obligations on Insider Information disclosure in line with the procedure and timeline set forth by the Bank of Russia.

## **6. INSIDERS**

- 6.1. Company's Insiders are as follows:
- 6.1.1. Individuals/ entities with an access to the Company's Insider Information pursuant to the contracts effected with them, inter alia:
- auditors (auditor companies);
  - assessors (including legal entities, with which assessors have effected employment contracts);
  - traders of securities, including the holder of the register (registrar);
  - credit agencies;
  - insurance companies.
- 6.1.2. members of the Company's governing and control/audit bodies (except for the General Shareholders Meeting):
- members of the Company's Board of Directors;
  - Company's General Director;
  - members of the Company's Audit Commission.
- 6.1.3. information agencies, which disclose or submit the Company's information;
- 6.1.4. rating agencies, which assign the rating to the Company, as well as to its securities;
- 6.1.5. individuals with an access to the Company's Insider Information pursuant to the employment and (or) civil contracts effected with them;
- 6.1.6. individuals/ entities who are entitled directly or indirectly (via the individuals/ entities controlled by them) to dispose at least 25 per cent of votes at the General Meeting of Company's Shareholders, as well as individuals/ entities with an access to the Insider Information due to holding of shares in the Company's authorized capital pursuant to federal laws, articles of association or in-house documents;
- 6.1.7. other individuals/ entities who shall be recorded in the List of Company's Insiders in a mandatory manner as per the Russian Federation Law.
- 6.1.8. The dedicated list of insiders shall be determined in accordance with the List of Company's Insiders.
- 6.2. Company's Insiders shall comply with requirements to:
- 1) making transactions with Company's financial instruments;
  - 2) submitting the information about transactions with Company's financial instruments made by them;
  - 3) other prohibitions and provisions set forth by these Rules, the Law and Bank-of-Russia regulations enacted pursuant to this Law.
- 6.3. Company's Insiders shall notify the Authorized Structural Unit about Company's securities held by them within 7 (Seven) business days from the date of Company's respective request.

## **7. LIST OF INSIDERS**

- 7.1. The Company permanently maintains the List of Company's Insiders.

- 7.2. The individuals/ entities specified in paragraphs 6.1.1- 6.1.1, 6.1.7 of these Rules shall be recorded in the List of Company's Insiders.
- 7.3. The Authorized Structural Unit maintains the list of insiders.
- 7.4. The List of Company's Insiders includes the information about:
- 1) the Company: full and abbreviated legal name, INN (taxpayer's identification number) and OGRN (main state registration number), registered address and postal address, contact telephone number and e-mail address;
  - 2) insiders – legal entities: full and abbreviated legal name, INN and OGRN (if applicable), registered address and postal address, contact telephone number and e-mail address;
  - 3) insiders – individuals: surname, name, patronymic; data on the place of residence or on the address, at which he/she can be reached; contact telephone number and e-mail address;
  - 4) the date, type of the event and ground for such event (recording in the List of Insiders; deletion from the List of Insiders). If the Insider is included into the List of Insiders pursuant to more than one grounds, all grounds therefor shall be specified in the List of Insiders.
- 7.5. The List of Company's Insiders in hard copy shall be signed by the General Director or Deputy General Director for Corporate Relations and General Issues and shall be affixed with the Company's seal.
- 7.6. The Authorized Structural Unit shall submit the List of Insiders to the trading authorities, which make transactions with Company's financial instruments, or to the Bank of Russia upon request.
- 7.7. The Authorized Structural Unit shall notify the individuals/entities included into the List of Company's Insiders about recording of their names in such List and about deletion of their names therefrom in line with the procedure set forth by the Bank-of-Russia regulations regarding counteraction against the unauthorized use of insider information and shall inform the specified individuals/entities about requirements of the Law.
- 7.8. When the contract is effected with a legal entity, which will obtain access to the Company's insider information pursuant to the signed contract, the Authorized Structural Unit shall inform this entity about requirements of the Law and Bank-of-Russia regulations enacted pursuant thereto, about liability for the unauthorized use of Company's insider information, as well as about recording of its name in the List of Company's Insiders.
- 7.9. If the Company is an entity entitled directly or indirectly (via the individuals/ entities controlled by it) to dispose at least 25 per cent of votes in the supreme governing body of issuers of securities, which are admitted to official listing in the Russian Federation, and (or) securities, for which an application for admission to official listing is filed, the Company shall perform the duties on maintaining the list of insiders pursuant to the grounds specified in paragraph 6, Article 4 of the Law; according to these grounds, insiders are the individuals/ entities mentioned in paragraphs 7 and 13, Article 4 of the Law.
- 7.10. The Company shall maintain one list of insiders pursuant to all grounds. Insiders are informed about grounds for recording of their names in the List of Insiders by stating

this fact in the notification on recording of the individual's / entity's name in the List of Insiders.

**8. RECORDING OF THE INDIVIDUAL'S/ENTITY'S NAME  
IN THE LIST OF INSIDERS. DELETION OF THE  
INDIVIDUAL'S/ENTITY'S NAME FROM THE LIST OF  
INSIDERS.**

- 8.1. If the individual's/entity's name is recorded in the List of Company's Insiders, it means that this individual/entity is allowed to obtain access to the Company's Insider Information, including to the storage media, files and databases with such information.
- 8.2. If the individual's/entity's name is deleted from the List of Company's Insiders, it means that this individual/ entity is prohibited to have access to the Company's Insider Information, including the storage media, files and databases with such information.
- 8.3. The individual/entity shall be included into the List of Company's Insiders before submission of the insider information to him/her/it, inter alia, if:
  - 1) the contract, which stipulates access to the Company's Insider Information, is effected;
  - 2) the contract (addendum on amending the contract terms and conditions), which stipulates regular access of the individual/ entity to the Company's Insider Information, is effected;
  - 3) the Company's Authorized Structural Unit makes the decision on election/appointment of the person to be the member of the Board of Directors or Audit Commission, Company's General Director;
  - 4) the Company effects the contract with the information agency, pursuant to which the information agency discloses or submits the Company's information;
  - 5) the contract, which stipulates an access to the Company's Insider Information as per the signed civil contract on rating of the Company and/or its securities, is effected with the rating agency;
  - 6) the Company's employee fulfills duties related to granting (obtaining) an access to the Company's Insider Information on a permanent basis;
  - 7) the Company's employee is granted a temporary access (Company's employee obtains a temporary access) to the Insider Information due to fulfilling dedicated job duties;
  - 8) other grounds.
- 8.4. The individual's/ entity's name shall be deleted from the List of Company's Insiders, if:
  - 1) the contract, based on which or pursuant to which the individual/ entity has been granted (the individual/entity has obtained) an access to the Company's Insider Information, is terminated or amended;
  - 2) the Company's employee relinquishes his/her duties related to granting (obtaining) an access to the Company's Insider Information;
  - 3) powers of the person occupied the position of the Company's General Director, member of the Board of Directors or Audit Commission, are terminated, inter alia, are early terminated;
  - 4) the court decision on deletion of the individual's / entity's name from the List of Company's Insiders comes into legal force;

- 5) the individual/entity is wrongfully (unlawfully) included into the List of Company's Insiders;
- 6) the legal entity included into the List of Company's Insiders terminates its business activity due to liquidation or reorganization;
- 7) the legal entity included into the List of Company's Insiders is excluded from the Unified State Register of Legal Entities as a non-operational one;
- 8) an individual included into the List of Company's Insiders is died, or an individual is announced to be died or missing;
- 9) other grounds.

**9. PROCEDURE FOR NOTIFYING THE INDIVIDUALS/  
ENTITIES INCLUDED INTO THE LIST OF COMPANY'S  
INSIDERS (DELETED FROM THE LIST OF COMPANY'S  
INSIDERS)**

- 9.1. The Authorized Structural Unit shall inform insiders about the individual/entity, whose / which name is recorded in the List of Company's Insiders, is deleted from this List, as well as about changes in the grounds for including the individual/ entity into the List of Company's Insiders.
- 9.2. The individual/entity shall be notified about recording of his/her/its name in the List of Company's Insiders within 7 (Seven) days from the date of his/her/its name recording in this List.
- 9.3. The individual/entity shall be notified about deletion of his/her/its name from the List of Company's Insiders within 7 (Seven) days from the date of his/her/its name deletion from this List.
- 9.4. The individual/entity shall be notified about changes in the grounds, pursuant to which this individual/entity is included into the List of Company's Insiders, within 7 (Seven) days from the date of making respective changes in this List.
- 9.5. The notification of the individual/ entity about his/her/its name recording in the List of Company's Insiders (deletion of his/her/its name from the List of Company's Insiders) shall be prepared in accordance with the form of Annexes 1-4 to these Rules.
- 9.6. The individual/entity shall be notified about changes in the grounds, pursuant to which this individual/entity is included into the List of Company's Insiders, by issuing a message in any format, which shall describe all grounds, based on which the individual/ entity is included into the List.
- 9.7. Notifications prepared in accordance with paragraphs 9.2 – 9.4 of these Rules shall be signed by the Deputy General Director for Corporate Relations and General Issues and shall be affixed with the Company's seal.
- 9.8. In accordance with paragraphs 9.2-9.4 of these Rules, the Authorized Structural Unit shall inform the individual/entity by:
  - serving the respective notification against signature directly to the individual/ entity specified in paragraphs 9.2-9.4 thereof;
  - sending the respective notification to the last known address of the specified individual/entity, about which the Company is aware, by postal, telegraphic, electronic communication that allows ascertaining reliably the fact of Notification issue, inter alia, by using the Internet information and

telecommunication network, document electronic image (electronic and digital form, into which the document hard copy is converted via its scanning).

- 9.9. If the individual/entity has not received the notification issued to the individual/ entity in accordance with paragraph 9.8 of these Rules, the Company shall take actions reasonable and accessible in the current circumstances to identify the individual's/ entity's address, to which the notification can be sent.
- 9.10. The individuals/entities specified in paragraphs 9.2-9.4 of these Rules are entitled to request to submit them copies of the notification issued in line with the procedure set forth by this Section. This request shall be submitted in writing to the Authorized Structural Unit. The Authorized Structural Unit shall send the copy of the requested notification to such individuals/entities within 7 (Seven) business days from the date of such request.
- 9.11. The information about notifications prepared and issued in line with the procedure set forth by this Section shall be kept in the Company during 5 (Five) years at least from the date of deleting the individual's/entity's name from the List of Company's Insiders.

#### **10. DUTIES OF THE INDIVIDUALS/ENTITIES INCLUDED INTO THE LIST OF COMPANY'S INSIDERS**

- 10.1. The Company is entitled to request the individuals/entities included into the List of Company's Insiders to submit the information about transactions with Company's securities made by them, about the contracts effected by them, which are derivatives and which price depends on Company's securities.
- 10.2. Company's Insiders and their related parties shall submit the information about transactions with Company's financial instruments made by them (about transactions with Company's securities or about effected contracts, which are derivatives and which price depends on Company's securities) upon request of the Authorized Structural Unit. The period, for which the information shall be submitted, procedure and timeline for this information submission shall be specified in this request.
- 10.3. Insiders received the Company's request shall submit the requested information within 10 (Ten) business days.
- 10.4. The Authorized Structural Unit shall be responsible for recording and keeping the issued requests and received replies thereto.
- 10.5. For preventing and restraining the unauthorized use of Company's Insider Information in the course of making transactions with Company's financial instruments, Company's Insiders specified in paragraph 6.1.2 of these Rules shall submit the information about transactions with Company's financial instruments made by them, which shall be executed in accordance with the forms of Annexes 5-6 thereto, within 10 (Ten) business days from the date of such transactions.
- 10.6. The information about transactions with Company's financial instruments made by the Company's Insider shall be submitted to the Authorized Structural Unit by using the methods envisaged by paragraph 9.8 of these Rules.
- 10.7. If the Company's Insider has not made transactions with Company's financial instruments within the period specified in the request, he/she/it shall reply to the request by submitting the information about no such transactions made.

## **11. PROCEDURE FOR MAKING TRANSACTIONS WITH COMPANY'S SECURITIES BY COMPANY'S INSIDERS**

- 11.1. For preventing the risk to consider the transaction with Company's financial instruments as a non-standard transaction:
- 1) individuals/entities included into the List of Company's Insiders shall refrain from transactions with Company's securities and derivatives for their own benefit or for the benefit of third parties within 30 (Thirty) calendar days before the date of publishing the annual, interim financial (accounting) reporting, including the Company's consolidated and / or annual report;
  - 2) the Insider's position (portfolio) shall remain unchanged within 30 (Thirty) calendar days from the date of the transaction with the Company's financial instrument.
- 11.2. Company's Insiders and their related parties are prohibited to make transactions with Company's financial instruments by using the Company's Insider Information.
- 11.3. If the Company's Insider, including the individual/ entity related to the Insider mentioned in paragraph 6.1.2 of these Rules, makes transactions with Company's financial instruments within the period specified in paragraph 11.1 thereof, as well as within the period from the date of creating the information by the Company's Insider or from the date when the Company's Insider is aware of the information classified as the Insider Information, till the date of such information disclosure, it testifies that the Company's Insider may have used the Company's Insider Information in an unauthorized manner during making such transaction.
- 11.4. The Company's Insider, including the individual/entity related to the Insider specified in paragraph 6.1.2 of these Rules, shall be responsible for proving the fact of making the transaction with Company's financial instruments without using the Insider Information, if the Company's Insider, including the individual/ entity related to the Insider, has made the transaction within the period defined in paragraph 11.3 thereof.

## **12. LIABILITY FOR UNAUTHORIZED USE OF INSIDER INFORMATION**

- 12.1. In accordance with Article 71 of the Federal Law on Joint-Stock Companies and Company's Articles of Association, members of the Company's Board of Directors and Company's General Director shall act for the benefit of the Company reasonably and in good faith when exercising their rights and fulfilling their duties/obligations.
- 12.2. The specified persons shall be liable to the Company for the losses caused to the Company by their wrongful acts (omission to act) in accordance with the Law of the Russian Federation.
- 12.3. The Company or Company's shareholder (shareholders) is (are) entitled to file a lawsuit to recover (reimburse) losses against the person (persons), including Company's officials, who has (have) used the Insider Information in an unauthorized manner or who has (have) disclosed the misleading, wrongful or deceptive information, inter alia, on behalf of the Company, if it has significantly changed the price for Company's securities.
- 12.4. In accordance with the Law of the Russian Federation, disciplinary measures, including even employment termination, can be imposed on Company's employees,

who have used the Insider Information in an unauthorized manner or who have disclosed the misleading, wrongful or deceptive information, inter alia, on behalf of the Company, if it has significantly changed the price for Company's securities, as well as on Company's employees, who have breached the bans set forth by the Law or who have not fulfilled requirements of the Law and regulations enacted pursuant to this Law, as well as requirements of these Rules.

- 12.5. The person, who has disseminated the false information, shall not be liable for the market manipulation, if he/she has not been aware and should not have been aware that the disseminated information is false.
- 12.6. The person, who has used the Insider Information, shall not be liable for unauthorized use of the Insider Information, if he/she has not been aware and should not have been aware that such information is the insider one.

### **13. PROCEDURE FOR ACCESS TO THE COMPANY'S INSIDER INFORMATION AND RULES FOR PROTECTION OF THIS INFORMATION CONFIDENTIALITY**

- 13.1. The Company shall ensure the organizational and technical conditions required for keeping confidentiality of the Insider Information and shall take actions on Insider Information protection against the unauthorized access.
- 13.2. For protecting confidentiality of the Company's Insider Information, inter alia, for protecting the Insider Information against unauthorized access, unauthorized use or submission to other individuals/entities, the Company shall develop and/or apply the actions on:
  - 1) control of an access to certain premises occupied by the Company, including during day-offs and public holidays;
  - 2) use of tangible media with the Company's Insider Information and rules of handling with such tangible media, which provide for the possibility to submit them only to Company's Insiders;
  - 3) prompt destruction of all tangible media (including draft documents, rough papers, etc.), which are not subject to storage and which may include the Company's Insider Information;
  - 4) granting of an actual access to the Company's Insider Information to a restricted scope of persons, and only to the information required for fulfillment of job duties by such persons within their powers or required for rendering certain services pursuant to the civil contracts effected by the Company;
  - 5) distribution of Company personnel's rights and duties, availability of the job description for the Company's employee, which determines his/her rights and duties taking into account the right of access to the Insider Information;
  - 6) use of the software and hardware, which prevent an unauthorized access to the Company's Insider Information;
  - 7) prompt familiarization of all Company's employees with these Rules and with the List of data to be classified as the Company's Insider Information against signature;
  - 8) annual training of the Company's personnel in line with the procedure established by the resolution of the General Director or Deputy General Director for Corporate Relations and General Issues to assess the knowledge of provisions described in these Rules by Company's employees and their awareness on rules of handling with

- Company's Insider Information and their understanding of consequences in case of breaching the rules;
- 9) other actions on restriction of an access to the Company's Insider Information.
- 13.3. Individuals/ entities included into the List of Company's Insiders have access to the Company's Insider Information.
  - 13.4. Individuals/ entities, to whom/which an access to the Company's Insider Information, including the media, files and databases, is granted on legal grounds, are not entitled to:
    - 1) use the Company's Insider Information for making transactions with financial instruments, the foreign currency and/or goods, to which Company's Insider Information is related;
    - 2) submit the Company's Insider Information to other individuals/entities, except for the cases of this information submission to the individuals/ entities included into the List of Company's Insiders due to fulfillment of their duties set forth by the Russian Federation Law or due to fulfillment of their job duties or execution of the contract;
    - 3) recommend third parties, bind or prompt them in any other way to purchase or sell financial instruments, the foreign currency and/or goods, to which the Company's Insider Information is related;
    - 4) make unreasonable access to the Company's Insider Information;
    - 5) manipulate the market by using an access to the Company's Insider Information.
  - 13.5. When individuals/ entities included into the List of Company's Insiders receive the notification about recording of their names in the specified List, they shall study the List of Company's Insider Information published in the Company's Official Web-Site. Thereby, they undertake to comply with restrictions on use of the Insider Information and requirements set forth by the Law and regulations enacted pursuant thereto.
  - 13.6. For restricting access to the Company's Insider Information, the individuals/entities included into the List of Company's Insiders shall:
    - 1) comply with the rules on restricted access to and restricted use of the Company's Insider Information;
    - 2) notify promptly the Head of the Company's Authorized Structural Unit, if loss of tangible media with the Insider Information, lack of documents, files with the Company's Insider Information or unauthorized access to the Insider Information is identified.
  - 13.7. Any individual/entity, who/which is not included into the List of Company's Insiders and is not entitled to have an access to the Insider Information, but who/which has gained an access thereto due to any reasons, shall
    - 1) comply with restrictions and bans set forth by the Law;
    - 2) stop studying such information immediately;
    - 3) take actions on keeping the confidentiality of the Company's Insider Information, in other words, prevent distribution and/or submission of such information.
  - 13.8. Handling with the Company's Insider Information shall be performed:
    - in the premises separated from work places of the employees who do not have access to the Company's Insider Information. If it is impossible to separate the workplaces, the Head of the Structural Unit, to whom employees/ Company's

insiders are subordinate, shall personally be responsible for protecting and preserving the Company's Insider Information;

- taking into restrictions of an access to copiers, printers and similar equipment used by the employees with an access to the Company's Insider Information;
- in dedicated premises, when negotiations, including negotiations with counterparties – Company's insiders, are held. Such premises shall exclude the possibility of unauthorized distribution of the information about the fact and content of the specified negotiations, if the risk of unauthorized use of the Company's Insider Information exists.

#### **14. RULES FOR MONITORING COMPANY'S COMPLIANCE WITH REQUIREMENTS OF THE RUSSIAN FEDERATION LAW REGARDING COUNTERACTION AGAINST THE UNAUTHORIZED USE OF INSIDER INFORMATION AND MARKET MANIPULATION**

- 14.1. The Internal Inspector shall control how the Company complies with requirements of the Russian Federation Law regarding Counteraction against the Unauthorized Use of Insider Information and Market Manipulation (hereinafter referred to as internal audit for CUUI&MM).
- 14.2. Internal audit is aimed at controlling that Company's activity complies with requirements to preventing, identifying and restraining the unauthorized use of Company's Insider Information and (or) market manipulation.
- 14.3. For avoiding the conflict of interests, the Internal Inspector, who carries out the internal audit for CUUI&MM, shall not exercise the functions of fulfilling requirements of the Russian Federation Law regarding counteraction against the unauthorized use of Company's Insider Information and respective Bank-of-Russia regulations (maintain the List of Company's Insiders, notify the individuals/ entities about recording of their names in the List of Company's Insiders (deletion of their names from the List), submit the List of Company's Insiders to the trading authorities and to the Bank of Russia upon their request), as well as he/she shall not be the Company's Internal Auditor.
- 14.4. It is not allowed to delegate the function of CUUI&MM compliance monitoring to third parties.
- 14.5. CUUI&MM internal audit methods are identification, analysis, assessment, monitoring of the adverse effect risk, if Company's activity does not comply with requirements of the Law regarding CUUI&MM.
- 14.6. Main tasks of the CUUI&MM internal audit are as follows:
  - 1) control compliance with the Russian Federation Law and Company's by-laws regarding CUUI&MM, inter alia, ensure that Company's documents conform to CUUI&MM requirements and that Company's documents are aligned with each other;
  - 2) inform the General Director and Company's Internal Auditor about identified non-conformities on a regular basis for taking immediate actions on elimination of such non-conformities;
  - 3) rule out the unauthorized use of Company's Insider Information and/or market manipulation;

- 4) rule out the conflict of interests, inter alia, identify and control the conflict of interests, as well as prevent the conflict-of-interest consequences.
- 14.7. The Company shall ensure continuity of the CUUII&MM internal audit.
- 14.8. The Head of the Company's structural unit – Internal Inspector (if the Head of the Company's structural unit – Internal Inspector is temporarily absent, the acting head shall be appointed) shall be responsible for CUUII&MM internal audit. The Internal Inspector shall report to the Company's General Director.
- 14.9. The Internal Inspector shall perform the following functions:
- 1) control that the Company, its employees, as well as individuals/ entities included into the List of Company's Insiders comply with requirements, restrictions and bans set forth by the Russian Federation Law regarding CUUII&MM;
  - 2) assess the compliance/regulatory risk taking into account the probability of its occurrence and impact of this risk on Company's activity;
  - 3) inform immediately the General Director and Internal Auditor about possible and/or committed breaches of the CUUII&MM Law, as well as about all cases, which impede fulfillment of Internal Inspector's functions;
  - 4) participate in development of in-house documents and arrangement of the actions related to fulfillment of CUUII&MM Law requirements;
  - 5) consult the personnel on application of these Rules, inter alia, on application of CUUII&MM rules;
  - 6) organize the identification of deals and transactions with attributes of the Insider Information unauthorized use and market manipulation, participate in such identification, check the non-standard deals;
  - 7) participate in review of requests, claims and applications related to CUUII&MM;
  - 8) communicate with the Bank of Russia on CUUII&MM issues;
  - 9) control compliance with the procedure for access to the Insider Information and rules on preservation of the Insider Information confidentiality;
  - 10) control compliance with the procedure and timeline for Insider Information disclosure
  - 11) control that CUUII&MM training is held;
  - 12) submit to the General Director and Internal Auditor the report on control/ inspection findings how the Company, its employees, as well as individuals/entities included into the List of Company's Insiders fulfill (comply with) requirements, restrictions and bans set forth by the Russian Federation Law regarding CUUII&MM;
  - 13) issue recommendations on elimination of identified non-conformities;
  - 14) develop the CUUII&MM recommendations and submit them to the General Director and Company's Internal Auditor;
  - 15) participate in updating/ adjustment of the CUUII&MM internal audit rules;
  - 16) perform other measures and actions aimed at preventing, identifying and restraining breaches of the Insider Law.

When fulfilling the specified functions, the Internal Inspector is entitled to request that the persons being members of the management bodies, Company's structural units and its employees, as well as other individual/ entities included into the List of Company's Insiders submit documents, copies thereof, written and oral explanations, other

information, inter alia, clarifications required for the Internal Inspector to exercise his/her functions.

- 14.10. The Internal Inspector shall quarterly audit fulfillment of the requirements defined in these Rules by the individuals/ entities with an access to the Insider Information, as well as by other employees of the Company for identifying promptly the areas of insider information possible unauthorized use and for controlling such areas.
- 14.11. Upon internal audit findings, the Internal Inspector's report on probable and (or) occurred events of the compliance/regulatory risk shall quarterly be prepared. Such report shall include the following information:
- the audit/inspection period and events occurred during the reporting period;
  - facts on Company's compliance with requirements of the Law, Bank-of-Russia regulations enacted pursuant to this Law and Company's by-laws or facts on Company's breach thereof;
  - results of monitoring the activity of the Authorized Structural Unit, as well as structural units, which handle with the Company's Insider Information;
  - nature of breaches/non-conformities, actions taken to eliminate such breaches/non-conformities, as well as recommendations on prevention of similar breaches/non-conformities in future, if any breaches/non-conformities are identified.
- 14.12. The Report shall be signed by the Head of the structural unit – Internal Inspector within 15 (Fifteen) days from the date of quarter completion and shall be submitted to the General Director and Internal Auditor within 1 (One) business day from the date of report approval.
- 14.13. The Internal Inspector is entitled at his/her own initiative and at any time to audit that requirements of the Law, other regulations, these Rules, inter alia, requirements set forth to the Company's employees to provide explanations and submit reports, are properly fulfilled. The Internal Inspector is entitled at his/her own initiative and at any time to familiarize himself/herself with documents and gain access to appliances, which are used for keeping, processing and protecting the Company's Insider Information.
- 14.14. The Internal Inspector is entitled to submit to the Bank of Russia the information about probable and (or) occurred events of the CUUI&MM compliance/regulatory risk.
- 14.15. For unimpeded and efficient performance of his/her functions, the Internal Inspector has a right of access to any premises of the Company, where the Company's Insider Information can be kept or can be available in his/her reasonable opinion.
- 14.16. To the necessary extent, Company's officials and employees shall facilitate the Internal Inspector to fulfill his/her functions.
- 14.17. The Company's Board of Directors shall assess actions of the Company's BoD members with respect to compliance with CUUI&MM requirements at least once per year.

## **15. MISCELLANEOUS**

- 15.1. For fulfilling requirements of the Law and regulations related thereto, the Company is entitled to develop in-house rules and provisions, which approval is within the competence of the Company's General Director.

- 15.2. These Rules shall be approved, amended and shall be considered to have become null and void in accordance with the resolution of the Company's Board of Directors.
- 15.3. These Rules shall be revised at least once per year. These Rules shall be amended, if any amendments are made in the Russian Federation Law regarding CUUII&MM and in the respective regulations of the Bank of Russia, if powers of the heads/ senior officials are changed, etc. The Internal Inspector shall participate in development of amendments in these Rules.
- 15.4. From the date of entry into force of these Rules, the Regulations on Insider Information of Open Joint-Stock Oil and Gas Company Slavneft approved by the Board of Directors of OAO NGK Slavneft on November 29, 2012 pursuant to Minutes of Meeting No.6 shall become null and void.

## ANNEXES

Annex No.1

to the Rules of Internal Audit for Preventing, Identifying and Restraining the  
Unauthorized Use of Insider Information of Public Joint-Stock Oil and Gas Company  
Slavneft

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

### NOTIFICATION ON RECORDING OF THE INDIVIDUALS'S NAME IN THE LIST OF INSIDERS

(form to be filled in for an individual)

No.	1. Information about the Company <sup>1</sup>	
1.1.	Full name of the Company	
1.2.	Taxpayer identification number (INN) of the Company	
1.3.	Primary state registration number (OGRN) of the Company	
1.4.	Registered address of the Company	
1.5.	Other address of the Company to deliver the postal correspondence	
1.6.	Telephone number of the Company	
1.7.	E-mail address of the Company	
1.8.	Surname, name, patronymic of the contact person responsible for maintaining the List of Company's Insiders	
1.9.	Telephone number of the contact person responsible for maintaining the List of Company's Insiders	
1.10.	E-mail address of the contact person responsible for maintaining the List of Company's Insiders	
1.11.	Category of the insider, to which the Company is related	

No.	2. Information about an individual included into the List of Insiders	
2.1.	Surname, name, patronymic of the Insider	

<sup>1</sup> Company – Public Joint-Stock Oil and Gas Company Slavneft

2.2.	Insider's date of birth	
2.3.	Insider's place of birth	
2.4.	Job position occupied by an individual in the Company	

No.	3. Information about grounds for issuing the Notification	
3.1.	Type of the event occurred, about which the individual is notified	Recording of the person's name in the List of Insiders
3.2.	Date of the event occurred, about which the individual is notified	
3.3.	Number of the paragraph (numbers of paragraphs) from Article 4 of Federal Law No.224-FZ dd. 27.07.2020, pursuant to which the individual is included into the list of insiders	
3.4.	Ground for recording the individual's name in the list of insiders, which is specified in the Bank-of-Russia regulation	
3.5.	Financial instrument, with respect to which the individual included into the list of Company's insiders shall submit the information about transactions made by him/her pursuant to Article 10 of the Federal Law dated 27.07.2010	

Please note that from the date of recording the individual's name in the List of Company's Insiders restrictions (Article 6) and duties (Article 10) are imposed on such individual as on the Insider, and responsibility (Article 7) is determined for him/her in accordance with Federal Law No.224-FZ dd. 27.07.2010.

\_\_\_\_\_  
Job position

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Full name

stamp here

Annex No.2

to the Rules of Internal Audit for Preventing, Identifying and Restraining the  
Unauthorized Use of Insider Information of Public Joint-Stock Oil and Gas Company  
Slavneft

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

**NOTIFICATION ON RECORDING OF THE ENTITY'S NAME IN THE LIST OF INSIDERS**  
(form to be filled in for a legal entity)

No.	1. Information about the Company	
1.1.	Full name of the Company	
1.2.	Company's INN	
1.3.	Company's OGRN	
1.4.	Registered address of the Company	
1.5.	Other address of the Company to deliver the postal correspondence	
1.6.	Telephone number of the Company	
1.7.	E-mail address of the Company	
1.8.	Surname, name, patronymic of the contact person responsible for maintaining the List of Company's Insiders	
1.9.	Telephone number of the contact person responsible for maintaining the List of Company's Insiders	
1.10.	E-mail address of the contact person responsible for maintaining the List of Company's Insiders	
1.11.	Category of the insider, to which the Company is related	

No.	2. Information about a legal entity included into the List of Insiders	
2.1.	Full legal name of the Insider	
2.2.	Insider's INN	
2.3.	Insider's OGRN	
2.4.	Registered address or other address to deliver the postal correspondence	

No.	3. Information about grounds for issuing the Notification	

3.1.	Type of the event occurred, about which the legal entity is notified	Recording of the entity's name in the List of Insiders
3.2.	Date of the event occurred, about which the legal entity is notified	
3.3.	Number of the paragraph (numbers of paragraphs) from Article 4 of Federal Law No.224-FZ dd. 27.07.2020, pursuant to which the legal entity is included into the list of insiders	
3.4.	Ground for recording the entity's name in the list of insiders, which is specified in the Bank-of-Russia regulation	
3.5.	Financial instrument, with respect to which the legal entity included into the list of Company's insiders shall submit the information about transactions made by this entity pursuant to Article 10 of the Federal Law dated 27.07.2010	

Please note that from the date of recording the entity's name in the List of Company's Insiders restrictions (Article 6) and duties (Article 10) are imposed on such entity as on the Insider, and responsibility (Article 7) is determined for this entity in accordance with Federal Law No.224-FZ dd. 27.07.2010.

\_\_\_\_\_  
Job position

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Full name

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Annex No.3

to the Rules of Internal Audit for Preventing, Identifying and Restraining the  
Unauthorized Use of Insider Information of Public Joint-Stock Oil and Gas Company  
Slavneft

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

**NOTIFICATION ON DELETION OF THE INDIVIDUAL'S NAME FROM THE LIST OF  
INSIDERS**  
(form to be filled in for an individual)

No.	1. Information about the Company	
1.1.	Full name of the Company	
1.2.	Company's INN	
1.3.	Company's OGRN	
1.4.	Registered address of the Company	
1.5.	Other address of the Company to deliver the postal correspondence	
1.6.	Telephone number of the Company	
1.7.	E-mail address of the Company	
1.8.	Surname, name, patronymic of the contact person responsible for maintaining the List of Company's Insiders	
1.9.	Telephone number of the contact person responsible for maintaining the List of Company's Insiders	
1.10.	E-mail address of the contact person responsible for maintaining the List of Company's Insiders	
1.11.	Category of the insider, to which the Company is related	

No.	2. Information about an individual, whose name is deleted from the List of Insiders	
2.1.	Surname, name, patronymic of the Insider	
2.2.	Insider's date of birth	
2.3.	Insider's place of birth	
2.4.	Job position occupied by an individual in the Company	

No.	3. Information about grounds for issuing the Notification	
3.1.	Type of the event occurred, about which the individual is notified	Deletion of the individual's name from the List of Insiders
3.2.	Date of the event occurred, about which the individual is notified	
3.3.	Number of the paragraph (numbers of paragraphs) from Article 4 of Federal Law No.224-FZ dd. 27.07.2020, pursuant to which the individual's name is deleted from the list of insiders	
3.4.	Ground for deletion of the individual's name from the list of insiders, which is specified in the Bank-of-Russia regulation	

\_\_\_\_\_  
Job position

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Full name

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Annex No.4

to the Rules of Internal Audit for Preventing, Identifying and Restraining the  
Unauthorized Use of Insider Information of Public Joint-Stock Oil and Gas Company  
Slavneft

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

**NOTIFICATION ON DELETION OF THE ENTITY'S NAME FROM THE LIST OF  
INSIDERS**

(form to be filled in for a legal entity)

No.	1. Information about the Company	
1.1.	Full name of the Company	
1.2.	Company's INN	
1.3.	Company's OGRN	
1.4.	Registered address of the Company	
1.5.	Other address of the Company to deliver the postal correspondence	
1.6.	Telephone number of the Company	
1.7.	E-mail address of the Company	
1.8.	Surname, name, patronymic of the contact person responsible for maintaining the List of Company's Insiders	
1.9.	Telephone number of the contact person responsible for maintaining the List of Company's Insiders	
1.10.	E-mail address of the contact person responsible for maintaining the List of Company's Insiders	
1.11.	Category of the insider, to which the Company is related	

No.	2. Information about a legal entity, which name is deleted from the List of Insiders	
2.1.	Full legal name of the Insider	
2.2.	Insider's INN	
2.3.	Insider's OGRN	
2.4.	Registered address or other address to deliver the postal correspondence	

No.	3. Information about grounds for issuing the Notification	
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3.1.	Type of the event occurred, about which the legal entity is notified	Deletion of the entity's name from the List of Insiders
3.2.	Date of the event occurred, about which the legal entity is notified	
3.3.	Number of the paragraph (numbers of paragraphs) from Article 4 of Federal Law No.224-FZ dd. 27.07.2020, pursuant to which the entity's name is deleted from the list of insiders	
3.4.	Ground for deletion of the entity's name from the list of insiders, which is specified in the Bank-of-Russia regulation	

\_\_\_\_\_  
Job position

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Full name

stamp here

to the Rules of Internal Audit for Preventing, Identifying and Restraining the  
Unauthorized Use of Insider Information of Public Joint-Stock Oil and Gas Company  
Slavneft

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

**INFORMATION ABOUT TRANSACTIONS WITH SLAVNEFT'S FINANCIAL  
INSTRUMENTS MADE BY THE INSIDER**  
(form to be filled in for an individual)

Full name of the insider - individual	
Type and reference details of the document identifying the person of the insider - individual	
Place of insider's (individual's) residence	
Full legal name of the entity, into which List of Insiders the insider's name is recorded	Public Joint-Stock Oil and Gas Company Slavneft
Date of the transaction	
Type of the deal (transaction)	
Amount of the deal (transaction)	
Place of making the transaction (name of the trading authorities or over-the-counter market)	
Type, category of the security	
Full legal name of the securities issuer	
State registration number of the security issue	
Price per security (except for repo transactions)	
Price of one security purchase and sale (as per the repo contract)	
Quantity of securities	
Specify whether the Company shall confirm that it has received the specified information about transactions with Company's securities made by you	

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print the full name

Annex No.6

to the Rules of Internal Audit for Preventing, Identifying and Restraining the  
Unauthorized Use of Insider Information of Public Joint-Stock Oil and Gas Company  
Slavneft

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

**INFORMATION ABOUT TRANSACTIONS WITH SLAVNEFT'S FINANCIAL  
INSTRUMENTS MADE BY THE INSIDER**  
(form to be filled in for a legal entity)

Full legal name of the insider – legal entity	
INN and OGRN of the insider – legal entity	
Registered address of the insider – legal entity	
Full legal name of the entity, into which List of Insiders the insider's name is recorded	Public Joint-Stock Oil and Gas Company Slavneft
Date of the transaction	
Type of the deal (transaction)	
Amount of the deal (transaction)	
Place of making the transaction (name of the trading authorities or over-the-counter market)	
Type, category of the security	
Full legal name of the securities issuer	
State registration number of the security issue	
Price per security (except for repo transactions)	
Price of one security purchase and sale (as per the repo contract)	
Quantity of securities	
Specify whether the Company shall confirm that it has received the specified information about transactions with Company's securities made by you	

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Print the full name