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REGULATIONS OF ROSNEFT

ON THE INSIDER INFORMATION

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INTRODUCTORY PROVISIONS

INTRODUCTION

The Regulations of Rosneft "On the insider information" (hereinafter referred to as Regulations) establish the requirements to the legal access and application of the data related to the insider information of Rosneft, regulations on protection of confidentiality of the insider information of Rosneft, and control of observance by Rosneft of the requirements of the legislation of the Russian Federation and the regulatory acts in the field of countermeasure to misuse of the insider information, manage the procedure of maintenance and transfer of the list of Insiders of Rosneft, and define the features of performance of transactions in financial instruments by the Insiders of Rosneft.

The present Regulations have been developed in compliance with the following legal acts:

- The Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation, and on introduction of alterations in specific legislative acts of the Russian Federation";
- The Order of the Federal Financial Markets Service of Russia No. 13-51/pz-n dated 18.06.2013 "On approval of the Regulations on procedure of notification of the persons of add into the list of insiders and removal from such list; the Regulations on procedure of transfer of the lists of insiders to the trade organizers through which the transactions in financial instruments, foreign currency, and (or) goods are performed; the Regulations on procedure and time frames of referral of notifications by the insiders concerning transactions performed by them";
- The Order of the Federal Financial Markets Service of Russia No 11-18/pz-n dated 12.05.2011 "On approval of the List of information related to the insider information of the persons indicated in the Items 1 - 4, 11 and 12 of the Clause 4 of the Federal Law "On countermeasure to misuse of the insider information and market manipulation, and on introduction of alterations in specific legislative acts of the Russian Federation", as well as procedure and time frames of disclosure of such information".

AIMS

The present Regulations have been developed in order to establish the uniform rules of use of the insider information of Rosneft intended for prevention and suppression of any cases of misuse of the insider information of Rosneft when performing transactions in financial instruments by the Insiders of Rosneft.

TASKS

The tasks of the present Regulations are the following:

- determination of the rules of referral:
 - ♦ of the data to the insider information of Rosneft;
 - ♦ of the persons to the Insiders of Rosneft,
- determination of the general requirements:

- ◆ to establishment, alteration, and termination of procedure of use and access to the insider information of Rosneft;
- ◆ to control of observance by Rosneft of the requirements of the legislation of the Russian Federation and the regulatory acts in the field of countermeasure to misuse of the insider information;
- ◆ to disclosure of the insider information of Rosneft;
- regulation of the procedure of maintenance of the list of Insiders of Rosneft, notification of the persons of add (removal) to the list (from the List) of the Insiders of Rosneft, transfer of the list of Insiders of Rosneft to the trade organizer through which the transactions in financial instruments of Rosneft are performed, and/or to the regulator according to the procedure envisaged by the regulatory acts in the field of countermeasure to misuse of the insider information;
- establishment of the rules:
 - ◆ of performance by the Insiders of Rosneft of transactions in financial instruments of Rosneft including the procedure of notification of the Insiders of Rosneft of the transactions in financial instruments of Rosneft performed by them;
 - ◆ of confidentiality protection of the insider information of Rosneft.

SCOPE

The present Regulations are mandatory for the employees:

- of the Corporate Governance Department of Rosneft;
- of other structural subdivisions of Rosneft

involved in the process of creation and (or) application of the data related to the insider information of Rosneft.

The regulatory, local standard and other internal documents shall not contradict the present Regulations.

VALIDITY AND AMENDMENT PROCEDURE

The present Regulations are a permanent local regulatory document.

The present Regulations are approved at Rosneft by a decision of the Board of Directors of Rosneft and put into force in Rosneft by Rosneft's order.

The present Regulations are recognized as ceased to be in force at Rosneft on the basis of a decision of the Board of Directors of Rosneft.

The alterations in the present Regulations are introduced on the basis of a decision of the Board of Directors of Rosneft and put into force by Rosneft's order.

The initiators of the alterations made in the present Regulations are the following: the Corporate Governance Department of Rosneft and other structural subdivisions of Rosneft in agreement with the Corporate Governance Department of Rosneft.

The alterations in the present Regulations are made in the following cases: alterations in the legislation of the Russian Federation and the regulatory acts in the field of countermeasure to misuse of the insider information, organizational structure or authority of the managers, etc.

In case when as a result of alteration of the effective legislation of the Russian Federation and/or the regulatory acts in the field of countermeasure to misuse of the insider information, the certain norms of the present Regulations come into collision with them, the corresponding norms of the legislation of the Russian Federation and/or the regulatory acts in the field of countermeasure to misuse of the insider information shall be applied.

The norms of the present Regulations contradictory to the legislation of the Russian Federation and/or the regulatory acts in the field of countermeasure to misuse of the insider information do not affect the validity of its other norms, while Rosneft will take all necessary measures in order to bring to conformity the contradictory norms of the present Regulations with the effective legislation of the Russian Federation and/or the regulatory acts in the field of countermeasure to misuse of the insider information.

The responsibility for maintenance of the present Regulations in Rosneft in current status is laid on the Director of the Corporate Governance Department, the Corporate Secretary of Rosneft.

The control of execution of the present Regulations requirements is laid on the Top Manager of Rosneft in charge of the corporate governance issues.

1. TERMS AND DEFINITIONS

CORPORATE GLOSSARY TERMS AND DEFINITIONS

INSIDER OF ROSNEFT – an individual and (or) a legal person having an access to the insider information of Rosneft under the law, by-law and (or) local standard acts, job position, fulfillment of labor functions, or on the base of the civil-law contract concluded with Rosneft, and added into the list of insiders of Rosneft.

INSIDER INFORMATION OF ROSNEFT – the accurate and specific information that has not been disseminated or provided by Rosneft (including information representing commercial, service or other legally protected secret), dissemination or provision of which can have a considerable impact on the prices of the financial instruments of Rosneft, and added to the List of information related to the insider information of Rosneft.

TRANSACTIONS IN FINANCIAL INSTRUMENTS – performance of transactions or other actions focused on buying, selling, or other change of rights to the financial instruments, and also the actions related to incurrence of liabilities of performance of the indicated actions including setting orders (issuing commissions).

TRADE ORGANIZER – a person rendering services on carrying out organized bidding on the goods market and (or) financial market on the base of the exchange license or the mercantile system license.

ORGANIZED BIDDING – the bidding carried out on a regular basis according to the established rules envisaging the procedure of access of the persons to participation in the bidding to enter into the contracts of sale of goods, securities, foreign currency, repurchase agreements, and the contracts representing derivative financial instruments.

INFORMATION PROVISION – the actions focused on acquisition of information by the certain range of persons in compliance with the legislation of the Russian Federation concerning securities [Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation"].

INFORMATION DISCLOSURE – provision of accessibility of the information for all concerned persons irrespective of the purposes of acquisition of this information in compliance with the procedure guaranteeing its discovery and acquisition.

INFORMATION DISSEMINATION – actions:

- focused on acquisition of the information by an uncertain range of persons or on transfer of the information to an uncertain range of persons particularly by its disclosure in compliance with the legislation of the Russian Federation concerning securities;
- associated with the information publishing in mass media including electronic, information-telecommunication networks, the access to which is not limited to a certain range of persons (including Internet);
- associated with the information dissemination through electronic, information and telecommunication networks, the access to which is not limited to a certain range of persons (including Internet) [Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to

misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation"]].

LIST OF INSIDERS OF ROSNEFT – the confidential document containing the data on the insiders of Rosneft (including personal data of the individual insiders) drawn and subject to maintenance in Rosneft on a permanent basis.

ACTUAL ACCESS TO THE INSIDER INFORMATION OF ROSNEFT (ACCESS TO THE INSIDER INFORMATION OF ROSNEFT) – an authorized direct access (including access by the transfer act) of a person to the data related to the insider information of Rosneft and to material media (hard copies, electronic media, databases, information systems, computer networks, and other media) containing the insider information of Rosneft.

FINANCIAL INSTRUMENT – a security or a derivative financial instrument.

TERMS AND DEFINITIONS FOR THE PURPOSES OF THE PRESENT DOCUMENT

REGISTER KEEPER (REGISTRAR) – a legal person representing a professional participant of the security market and carrying out activity on maintenance of the security holder register.

OFFICIAL – an official appointed by the decision of the Board of Directors of Rosneft and accountable to the Board of Directors of Rosneft, whose liabilities include control of observance by Rosneft of the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation" and the regulatory acts in the field of countermeasure to misuse of the insider information adopted in compliance with it.

PROHIBITIVE PERIOD – a period during which the Insiders of Rosneft are not entitled to perform transactions in financial instruments of Rosneft.

CONTACT PERSON – a worker of the Information Disclosure Authority of the Corporate Governance of Rosneft responsible for the maintenance of the list of Insiders of Rosneft.

NEWS FEED – an information resource being updated online and provided by the information agency.

LIST OF INFORMATION RELATED TO THE INSIDER INFORMATION OF ROSNEFT – the list of confidential information drawn up on the base of the Order of the Federal Financial Markets Service of Russia No. 11-18/pz-n dated 12.05.2011 "On approval of the List of information related to the insider information of the persons indicated in the Items 1 - 4, 11 and 12 of the Clause 4 of the Federal Law "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation", as well as procedure and time frames of disclosure of such information", and approved by the order of Rosneft within the Company Standard "Confidential information protection" No. PZ-11.3 S-0006.

Note: The list of information related to the insider information of Rosneft is the public information published on official website of Rosneft at: <http://www.rosneft.ru/Investors/insiders/>.

PERMISSIVE PERIOD – a period during which the Insiders of Rosneft are entitled to perform transactions in financial instruments of Rosneft.

ROSNEFT DISPATCH DEPARTMENT – Document Flow Authority of the Document Management and Archive Department of Rosneft.

2. NOTATIONS AND ABBREVIATIONS

IFRS – International Financial Reporting Standards.

RAP – Russian Accounting Standards.

REGULATOR – till 01.09.2013 – the federal executive authority for financial markets: the Federal Financial Markets Service (FFMS of Russia), since 01.09.2013 – the Bank of Russia Financial Markets Service (BRFMS), since 03.03.2014 – the Bank of Russia.

3. INSIDER INFORMATION

3.1. The following information refers to the insider information of Rosneft:

- which exhaustive list is approved by the Order of FFMS of Russia No. 11-18/pz-n dated 12.05.2011 "On approval of the List of information related to the insider information of the persons indicated in the Items 1 - 4, 11 and 12 of the Clause 4 of the Federal Law "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation", as well as procedure and time frames of disclosure of such information",

and

- added to the List of information related to the insider information of Rosneft approved by the Order of Rosneft within the Company Standard "Confidential information protection" No. PZ-11.3 S-0006.

3.2. The following information does not refer to the insider information of Rosneft:

- information which became available for an unlimited range of persons, particularly, as a result of its dissemination (disclosure of insider information of Rosneft);
- research, forecasts and assessments with regard to the Rosneft financial instruments performed on the base of the public information, as well as recommendations and (or) offers on performance of transactions in financial instruments of Rosneft;
- information and (or) data based on it to be transferred by Rosneft and (or) by the person (persons) engaged by Rosneft to the potential acquirers, or used by Rosneft and (or) by the person (persons) engaged by Rosneft for giving recommendations or otherwise motivating the potential acquirers to acquisition of the Rosneft securities due to allocation (Allocation organization) and (or) offer (Offer organization) of equity securities of Rosneft in the Russian Federation or outside the Russian Federation, particularly, through allocation of securities of a foreign issuer securing the rights in respect of the equity securities of Rosneft, provided that the potential acquirers are notified that such information (data) can be used by them exclusively for the purpose of making decision on acquisition of allocated (offered) securities;
- information on the person who has provided security for the bonds of Rosneft, envisaged by the Subitems 7 – 11, 30, 34 of the Item 2.1 of the List approved by the Order of FFMS of Russia No. 11-18/pz-n dated 12.05.2011 "Concerning approval of the List of information related to the insider information of the persons indicated in the Items 1 - 4, 11 and 12 of the Clause 4 of the Federal Law "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation", as well as procedure and time frames of disclosure of such information", if such person is the Russian Federation which has provided the state security of the Russian Federation, the constituent unit of the Russian Federation which has provided the state security of the constituent unit of the Russian Federation, and (or) the municipal unit which has provided the municipal security for the bonds of Rosneft.

4. INSIDERS

4.1. The following refer to the Insiders of Rosneft:

4.1.1. persons having access to the insider information of Rosneft on the base of the contacts entered into with them, including:

- auditors (audit organizations);
- appraisers (legal entities with which the appraisers have entered into labor contracts);
- competent participants of the security market, including the register keeper (registrar);
- lending agencies;
- insurance companies;
- trade organizers;

4.1.2. management and supervision authorities of Rosneft (except for the general shareholder meeting):

- members of the Board of Directors of Rosneft;
- members of the Board of Rosneft;
- President of Rosneft;
- members of the Auditing committee of Rosneft;

4.1.3. information agencies carrying out disclosure of provision of information of Rosneft;

4.1.4. rating agencies providing ratings to Rosneft as well as to its securities;

4.1.5. individuals having access to the insider information of Rosneft on the base of the labor and (or) civil-law contacts entered into with them.

4.2. Insiders of Rosneft shall fulfill the requirements established by the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation" and the regulatory acts in the field of countermeasure to misuse of the insider information, by the present Regulations:

- in respect to the procedure of performance of transactions in financial instruments of Rosneft;
- in respect of the procedure and time frames of notification of the performed transactions in financial instruments of Rosneft by the Insiders of Rosneft;
- other prohibitions and requirements established by the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation" and the regulatory acts in the field of countermeasure to misuse of the insider information.

4.3. Insiders of Rosneft shall communicate information to Rosneft on the Rosneft securities owned by them in the following order:

- the members of the Board of Directors of Rosneft, the Board of Rosneft, the Auditing Committee of Rosneft, and the President of Rosneft shall communicate information within 7

(seven) business days from the date of selection/assignment to the corresponding management or supervision authority of Rosneft;

- the individuals having access to the insider information of Rosneft due to fulfillment of labor functions or the entered into civil-law contract shall communicate information within 7 (seven) business days from the date of conclusion of the corresponding contract with Rosneft;
- the auditor (audit organization) shall communicate information within 7 (seven) business days from the date of his/her advance to the auditor of Rosneft according to the procedure envisaged by the Statute of Rosneft, and from the date of conclusion of the contract with Rosneft;
- the register keeper (registrar) shall communicate information within 7 (seven) business days from the date of conclusion of the contract with Rosneft for maintaining the security holder register of Rosneft;
- other legal bodies having access to the insider information of Rosneft on the base of the civil-law contract concluded with them shall communicate information within 7 (seven) business days from the date of conclusion of the corresponding contract with Rosneft.

5. LIST OF INSIDERS

5.1. GENERAL PROVISIONS

5.1.1. For the purpose of accounting of the persons referred by Rosneft to its insiders, and also to fulfill the requirements of the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation", as well as procedure and time frames of disclosure of such information" and the regulatory acts in the field of countermeasure to misuse of the insider information in Rosneft, the maintenance of the list of Insiders of Rosneft is arranged on a permanent basis.

5.1.2. The list of insiders of Rosneft shall contain the following information:

5.1.2.1. about Rosneft:

- full and abbreviated company names;
- Taxpayer Identification Number (INN) and Primary State Registration Number (OGRN);
- registered address and mailing address;
- contact telephone number, fax number, and e-mail address.

5.1.2.2. about insiders – legal bodies:

- full company name;
- Taxpayer Identification Number (INN) and Primary State Registration Number (OGRN);
- registered address and mailing address;
- contact telephone number, fax number, and e-mail address.

5.1.2.3. about insiders – individuals:

- full name;
- date and place of birth of the individual;
- identification document;
- information about place of residence of the individual or the contact address;
- contact telephone number, e-mail address.

5.1.3. The list of insiders of Rosneft shall contain information about data and type of the event (add to (removal from) the List of the Insiders of Rosneft) and the basis¹ for add (removal) of the person to the list (from the List) of the Insiders of Rosneft.

The list of insiders of Rosneft can also contain information about the following:

¹ There shall be indicated the number of item (numbers of items) of the Clause 4 of the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation, and on introduction of alterations in specific legislative acts of the Russian Federation" in compliance with which the person has been added to (removed from) the List of the Insiders of Rosneft, as well as the basis of add (removal) of the person to the list (from the List) of the Insiders of Rosneft, specified in the Item 5.2 of the present Regulations, or the number of contract entered into with the legal body added to (removed from) the List of the Insiders of Rosneft, due to conclusion (termination) of which the relevant legal body has been added to (removed from) the List of the Insiders of Rosneft.

- contact person (surname, name, patronymic, telephone number and e-mail address of the specified person);
- category (categories) of the insider envisaged by the Clause 4 of the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation", to which Rosneft refers (with regard to each category, there shall be indicated the number of item of the Clause 4 of the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation", and description of the insider category).
- financial instrument of Rosneft, in which respect the person added to the list of insiders of Rosneft shall send notification of the transaction performed by him/her, in case when the type of the event of which the person is being notified is add of the person to the list of insiders of Rosneft.

5.1.4. The hard copy of the list of insiders of Rosneft shall be signed by the Official and sealed by Rosneft.

All sheets of the list of Insiders of Rosneft which volume exceeds one sheet shall be numbered, bound and sealed with the signature of the Official and the stamp of Rosneft.

5.1.5. Rosneft shall transfer the list of insiders of Rosneft to the trade organizer through which the transactions in financial instruments of Rosneft are performed, and/or to the regulator under their motivated written request (inquiry).

5.1.6. According to the procedure established by the regulatory acts in the filed of countermeasure to misuse of the insider information, and the Item 5.3. of the present Regulations, Rosneft shall notify the persons added to the list of insiders of Rosneft of their add to such list and of removal from it, and also notify the specified persons of the requirements of the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation".

5.2. PROCEDURE OF ADD (REMOVAL) OF PERSON TO (FROM) THE LIST OF INSIDERS OF ROSNEFT

5.2.1. The person is subject to add to the list of insiders of Rosneft in the following cases:

5.2.1.1. provision of an actual access to the insider information of Rosneft to the person (acquisition of an access by the person) on the base of the civil-law contract entered into with him/her;

5.2.1.2. entry of Rosneft into the labor or civil-law contract with the person (coming into effect of the concluded contract) (or the terms change agreement to the labor or civil-law contract) which envisages a systematic access (access on a permanent basis) of the person to the insider information of Rosneft;

5.2.1.3. making decision by the authorized governance body of Rosneft on selection/assignment of the person to the position of the President of Rosneft, the member of the Board of Directors of Rosneft, the member of Board of Rosneft or the member of the Auditing Committee of Rosneft (indicating details of such decision (details of the corresponding document: date of adoption, number and data of drawing up of the Minutes of Meeting (Conference) of the authorized

governance body of Rosneft));

5.2.1.4. provision of the preliminary notification to the regulator by Rosneft of forwarding of the voluntary, compulsory or competitive offer on acquisition of securities; in case when Rosneft forwarded the voluntary, compulsory or competitive offer on acquisition of securities which have not been circulating within the organized bidding, but in respect of which an application was submitted on permission to the organized bidding – provision by Rosneft of the voluntary, compulsory or competitive offer on acquisition of the specified securities to the regulator;

5.2.1.5. entry of Rosneft into the contract (coming into effect of the concluded contract) with the information agency on the base of which the information agency performs disclosure or provision of the information of Rosneft (indicating details (date of entry into and number) of such contract);

5.2.1.6. provision to the rating agency (acquisition by the rating agency) of an access to the insider information of Rosneft on the base of the concluded civil-law contract of rating of Rosneft and (or) the securities of Rosneft (indicating details (date of entry into and number) of such contract);

5.2.1.7. fulfillment of the employment duties by the employee of Rosneft related to provision (acquisition) of an access to the insider information of Rosneft on a permanent basis;

5.2.1.8. temporary provision to the employee of Rosneft (acquisition by the employee of Rosneft) of an access to the insider information of Rosneft associated with fulfillment of individual employment duties;

5.2.1.9. on other grounds.

5.2.2. The person is subject to removal from the list of insiders of Rosneft in the following cases:

5.2.2.1. dissemination, including disclosure, or provision of the insider information of Rosneft in compliance with the legislation of the Russian Federation concerning securities;

5.2.2.2. termination (change) of labor or civil-law contract on the base of which or in pursuance of which the person was provided with (the person acquired) an access to the insider information of Rosneft;

5.2.2.3. termination of fulfillment of the employment duties by the employee of Rosneft related to provision (acquisition) of an access to the insider information of Rosneft;

5.2.2.4. termination, including early termination of authorities of the person who had held a position of the President of Rosneft, the member of the Board of Directors of Rosneft, the member of the Board of Rosneft or the member of the Auditing Committee of Rosneft;

5.2.2.5. execution of the legally effective court decision on removal of the person from the list of Insiders of Rosneft;

5.2.2.6. mistaken (illegal) add of the person to the list of insiders of Rosneft;

5.2.2.7. on other grounds (incl. the case of business termination as a result of liquidation or reorganization (in the form of merger, takeover or division) of the legal body included into the list of insiders of Rosneft; removal of the legal body as an invalid body from the Unified State Register

of Legal Entities (termination (forfeit) of legal capacity of the legal body), death of the individual included into the list of insiders of Rosneft, declaration of death or missing of the individual).

5.3. PROCEDURE OF NOTIFICATION OF PERSONS ADDED TO (REMOVED FROM) THE LIST OF INSIDERS OF ROSNEFT

5.3.1. Rosneft shall notify the person related to its insiders of add of such person to the list of insiders of Rosneft or of removal of such person from the specified List.

5.3.2. The person shall be informed of add to (removal from) the List of the Insiders of Rosneft **no later than in 7 (seven) business days from the date of add of the person to the list of insiders of Rosneft or from the date of removal from the specified List, respectively.**

5.3.3. Notification of the person of add to (removal from) the List of insiders of Rosneft shall be drawn according to the form contained in Appendixes 1-4 to the present Regulations.

5.3.4. Notification of add to (removal from) the List of insiders of Rosneft can be drawn on a hard copy and (or) in electronic form with an electronic signature in compliance with the requirements of the legislation of the Russian Federation. The Notification of add to (removal from) the List of insiders of Rosneft shall be assigned with the date and the reference number.

Notification of add to (removal from) the List of insiders of Rosneft drawn on a hard copy shall be signed by the Official and sealed by Rosneft.

All sheets of the Notification of add to (removal from) the List of insiders of Rosneft which volume exceeds one sheet shall be numbered, bound and sealed with the signature of the Official and the stamp of Rosneft.

5.3.5. Rosneft shall notify the person of his/her add to (removal from) the List of insiders of Rosneft through the following:

service of the Notification of add to (removal from) the List of insiders of Rosneft against written acknowledgement directly to the person added to (removed from) the List of the Insiders of Rosneft,

or

sending the Notification of add to (removal from) the List of insiders of Rosneft to the last of the addresses of the indicated person known by Rosneft via mail, telegraphic, teleprinter, or electronic communication enabling a reliable establishment of the fact of sending of the Notification.

In case when the Notification of add to (removal from) the List of insiders of Rosneft is drawn in the hard copy, the relevant person can be notified by sending using electronic communication, including the information-telecommunication network Internet, the electronic document (electronic digital form to which the document drawn in the hard copy has been converted by scanning).

5.3.6. If the Notification of removal from the list of Insiders of Rosneft sent to the last address of the removed person known to Rosneft was not received by this person, Rosneft shall take all reasonable measures available in such circumstances to identify the address of the person to which the Notification of removal from the list of Insiders of Rosneft can be sent.

5.3.7. The person added to (removed from) the List of the Insiders of Rosneft is entitled to request from Rosneft a hard copy of the Notification of add to (removal from) the List of insiders of Rosneft. In this case, Rosneft shall send (hand in) to such person a hard copy of the Notification of add to (removal from) the List of insiders of Rosneft signed by the Official and sealed by Rosneft within 7 (seven) business days from the date of reception of the relevant requirement of the person. All sheets of the copy of the Notification of add to (removal from) the List of insiders of Rosneft which volume exceeds one sheet shall be numbered, bound and sealed with the signature of the Official and the stamp of Rosneft.

5.3.8. Rosneft shall opportunely inform all the persons added to the list of insiders of Rosneft of any alterations in its details specified in the Item 5.1.2.1. of the present Regulations, particularly, by publishing a relevant statement on its official site.

5.3.9. Rosneft performs accounting of all sent Notifications of add to (removal from) the List of insiders of Rosneft. The full information on the sent Notifications of add to (removal from) the List of insiders of Rosneft is stored in Rosneft at least 5 (five) years from the date of removal of the person from the list of Insiders of Rosneft.

6. TRANSACTIONS PERFORMED BY INSIDERS

6.1. PROCEDURE OF PERFORMANCE OF TRANSACTIONS IN FINANCIAL INSTRUMENTS OF ROSNEFT BY THE INSIDERS OF ROSNEFT

6.1.1. The Insiders of Rosneft are entitled to perform transactions in financial instruments of Rosneft in the permissive period: from the next day after the day of publishing and/or disclosure of reports of Rosneft according to both international and Russian standards², till the last calendar day of the quarter when these reports have been published, inclusive.

6.1.2. The Insiders of Rosneft are not entitled to perform transactions in financial instruments of Rosneft in the prohibitive period:

- within 30 (thirty) calendar days after the day of purchase of the financial instruments of Rosneft (for sale of the financial instruments of Rosneft);
- after the date of occurrence (creation) of the information related to the insider information of Rosneft, till the date of disclosure of such information.

6.1.3. Performance of transactions in financial instruments of Rosneft by the Insider of Rosneft in the prohibitive period is indicative of the possible illegal use of the insider information of Rosneft by the Insider of Rosneft when performing such transactions.

6.2. PROCEDURE OF NOTIFICATION OF TRANSACTIONS IN FINANCIAL INSTRUMENTS OF ROSNEFT PERFORMED BY THE INSIDERS OF ROSNEFT

6.2.1. The Insiders added to the list of insiders of Rosneft and representing:

- members of the Board of Directors of Rosneft;
- members of the Board of Rosneft;
- President of Rosneft;
- members of the Auditing committee of Rosneft;
- individuals having access to the insider information of Rosneft on the base of the labor and (or) civil-law contacts entered into with them.

shall notify Rosneft of the transactions in financial instruments of Rosneft performed by them:

- of Rosneft securities transactions;
- of entry into the contracts representing the derivative financial instruments which price depend on the securities of Rosneft.

6.2.2. Notification of transactions in financial instruments of Rosneft performed by the Insider shall be drawn according to the form contained in the Appendixes 5, 6 to the present Regulations.

6.2.3. The Insider of Rosneft representing the person specified in the Item 6.2.1. of the present Regulations who has performed the corresponding transaction in financial instruments of Rosneft shall notify Rosneft of fact **within 10 (ten) business days after the date of performance of the**

² The annual or interim (quarterly) accounting reports according to RAP, the annual or interim (half-yearly) consolidated financial statements prepared in compliance with IFRS; quarterly report of an issuer; annual report of the joint-stock company.

relevant transaction in financial instruments of Rosneft, if no shorter timeframe has been established by the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation" and the regulatory acts in the field of countermeasure to misuse of the insider information.

6.2.4. The Insider of Rosneft who does not represent the person indicated in the Item 6.2.1. of the present Regulations shall notify Rosneft of the transactions in financial instruments of Rosneft performed by him/her in case of reception of the relevant request from Rosneft.

6.2.5. The Insider of Rosneft shall notify the regulator of the transactions in financial instruments of Rosneft performed by him/her in case when the motivated written inquiry (request, direction) is received from the regulator.

6.2.6. Having received the request from Rosneft and/or regulator, the Insider of Rosneft shall send the Notification of transactions in financial instruments of Rosneft performed by the Insider to the corresponding addressee within 10 (ten) business days after the date of reception of the relevant inquiry (request, direction).

6.2.7. The Insider of Rosneft is entitled to specify information about several transactions performed by him/her in a single Notification of the transactions in financial instruments of Rosneft performed by the Insider. At the same time, the conditions upon which each transaction in financial instruments of Rosneft is performed are specified separately.

6.2.8. The Notification of transactions in financial instruments of Rosneft performed by the Insider **shall be sent to Rosneft** using one of the following methods:

- submission of the notification to the Rosneft dispatch department or service against written acknowledgement to the Official or other person defined by him/her;
- sending by mail in a registered letter with a delivery confirmation;
- sending an electronic document electronically signed in compliance with the requirements of the legislation of the Russian Federation;
- other means specified by Rosneft.

6.2.9. The Notification of transactions in financial instruments of Rosneft performed by the Insider **shall be sent to the regulator** using one of the following methods:

- submission to the dispatch department of the central office of the regulator;
- sending by mail in a registered letter with a delivery confirmation;
- sending an electronic document electronically signed in compliance with the requirements of the legislation of the Russian Federation;
- sending through the web-interface of the personal account of the information exchange participant the link to which is stated on the official site of the regulator in the information-telecommunication network Internet.

6.2.10. The Notification of transactions in financial instruments of Rosneft performed by the Insider provided on a hard copy shall be signed by the Insider of Rosneft (authorized person of the insider of Rosneft), and if the Insider of Rosneft is a legal body, then it also shall be sealed by Rosneft.

The Notification of transactions in financial instruments of Rosneft performed by the Insider sent by a foreign organization as the Insider of Rosneft may not be sealed by the foreign organization in case when such sealing is not required in compliance with the personal law or the constituent documents of the foreign organization.

The Notification of transactions in financial instruments of Rosneft performed by the Insider containing more than one sheet shall be bound, while the sheets of the Notification shall be numbered. In case when the Notification of transactions in financial instruments of Rosneft performed by the Insider is sent by a legal body as the Insider, then the hard copy of the stated notification shall be sealed by this legal body on the binding and signed by an authorized person of such legal body. In case when the Notification of transactions in financial instruments of Rosneft performed by the Insider is sent by an individual as the Insider, each page of the hard copy shall be signed by this individual.

In case when the Notification of transactions in financial instruments of Rosneft performed by the Insider is sent on behalf of the insider of Rosneft by his/her authorized representative, together with the specified Notification, a power of attorney is sent (a copy of the power of attorney certified in due order) or other document (a copy of the document certified in due order) on the base of which the authority of the representative is based.

6.2.11. In order to prevent from and suppress the misuse of the insider information of Rosneft when performing transactions in financial instruments of Rosneft, the members of the Board of Directors of Rosneft, the members of the Board of Rosneft and the President of Rosneft must notify in written form the Official of an intention to perform individually the transactions in financial instruments of Rosneft prior to their performance.

The members of the Board of Directors of Rosneft, the members of the Board of Rosneft and the President of Rosneft shall notify quarterly the Official of the transactions in financial instruments of Rosneft performed by them.

7. PROCEDURE OF ACCESS TO INSIDER INFORMATION

7.1. The procedure of access to the insider information is provided by the Company Standard "Confidential information protection" No. PZ-11.3 S-0006.

7.2. The access to the insider information of Rosneft is provided to the persons added to the list of insiders of Rosneft in compliance with the Items 4.1., 5.2.1. of the present Regulations, the requirements of the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation" and the regulatory acts in the field of countermeasure to misuse of the insider information adopted in compliance with it.

7.3. The persons having an access to the insider information of Rosneft shall observe restrictions and prohibitions envisaged by the Items 8.3.-8.5. of the present Regulations and the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation".

Any person not included in the list of insiders of Rosneft and having no right to access to the insider information of Rosneft, who has obtained however the access to it for some reason shall proceed as follows:

- immediately discontinue familiarization with such information;
- take exhaustive measures on preservation of confidentiality of the insider information of Rosneft, particularly, prevent from dissemination and provision of such information;
- observe restrictions and prohibitions envisaged by the Items 8.3.-8.5. of the present Regulations and the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation".

7.4. When providing a right to access to the insider information of Rosneft to the employee, Rosneft shall:

- familiarize the employee against written acknowledgement with the Board of Directors, the Company Standard "Confidential information protection" No. PZ-11.3 S-0006, including the List of information related to the insider information of Rosneft;
- create all necessary conditions for the employee to observe the procedure of application of the insider information of Rosneft established by Rosneft;
- carry out other actions intended for confidentiality protection of the insider information of Rosneft.

8. PROCEDURE OF APPLICATION OF INSIDER INFORMATION

8.1. The Insiders of Rosneft shall adhere to the non-disclosure behavior in respect of the insider information of Rosneft which is envisaged by the Company Standard "Confidential information protection" No. PZ-11.3 S-0006, until the official disclosure of the Rosneft's insider information by Rosneft.

8.2. The insider information of Rosneft shall be applied exclusively on behalf of Rosneft, for provision of industrial and economic, financial and other activities of Rosneft according to the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation", the Board of Directors, the Company Standard "Confidential information protection" No. PZ-11.3 S-0006, on the base of labor contracts and (or) job descriptions or the civil-law contracts entered into with the third parties.

8.3. The persons who have obtained the access to the insider information of Rosneft, including the Insiders of Rosneft, are not entitled to:

- disclose the known (leaked out) insider information of Rosneft;
- apply the insider information of Rosneft for the purposes not associated with their professional activity in Rosneft and (or) for the purposes not envisaged by the terms of the civil-law or labor contracts/agreements entered into with Rosneft;
- apply the insider information of Rosneft for personal benefit or for benefit of third parties;
- apply the insider information of Rosneft to perform operations in financial instruments of Rosneft;
- communicate or made available the insider information of Rosneft to the third parties for the purpose of performance of operations in financial instruments of Rosneft by them, as well as communicate to such persons any recommendations on performance of the indicated operations based on the insider information of Rosneft.

8.4. Application of the insider information of Rosneft by the persons specified in the Item 8.3. of the present Regulations is forbidden:

- for performance of the operations in financial instruments of Rosneft affected by the insider information of Rosneft at own expenses or at expenses of the third party, except for performance of operations within discharge of liability on purchase or sale of the financial instruments of Rosneft which deadline has come, if such liability had occurred as a result of operation in financial instruments of Rosneft performed before the person has learnt the insider information of Rosneft;
- by communicating it to another person except for the cases when such information is communicated to the person included in the list of insiders of Rosneft due to discharge of liabilities established by the federal laws, due to discharge of labor liabilities or performance of a contract;
- by giving recommendations to the third parties, otherwise obliging or motivating them to purchase or sale of the financial instruments of Rosneft.

8.5. Performance of activities related to the market manipulation is forbidden according to the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation".

8.6. The requirement of adherence to the non-disclosure behavior in respect to the insider information of Rosneft also covers the Insiders of Rosneft who have terminated discharge of labor liabilities, functions, or other service liabilities in Rosneft before the date when the information acquired by such persons loses the status of the insider information of Rosneft in compliance with the Item 9.5. of the present Regulations or the Company Standard "Confidential information protection" No. PZ-11.3 S-0006.

The persons indicated in the present item are entitled to disclose the insider information of Rosneft exclusively in cases and according to the order envisaged by the civil-law or labor contracts concluded with them, or the legislation in force.

8.7. Any application of the insider information of Rosneft performed with violation of the conditions envisaged in the present section, including application of the insider information of Rosneft for the personal benefit of the persons possessing the insider information and the third parties is illegal and entails liability envisaged by the Board of Directors and the legislation of the Russian Federation.

9. DISCLOSURE OF INSIDER INFORMATION

9.1. The information included in the List of information related to the insider information of Rosneft is subject to disclosure except for the following information:

- concerning decisions made by the Board of Directors of Rosneft on issues regarding its competence in compliance with the Statute of Rosneft if such information refers to its confidential information (except for the information about the decisions made by the Board of Directors of Rosneft on issues regarding its competence in compliance with the federal laws);
- concerning terms of the contract regarding maintaining (stabilizing) prices of the issuance securities of Rosneft (the securities of a foreign issuer certifying the rights in respect of the issuance securities of Rosneft), except for the duration of the specified contract.

9.2. The information included in the List of information related to the insider information of Rosneft is subject to disclosure according to procedure and time frames envisaged by the regulatory acts of the regulator for disclosure of statements on considerable facts of issuers of the issuance securities.

9.3. The statement about the insider information of Rosneft shall be disclosed in the following period from the date of occurrence of the corresponding fact (event, action) or the date when Rosneft has learnt or should have learnt on its occurrence:

- in the newsfeed – no later than in 1 calendar day;
- on a webpage in the information-telecommunication network Internet – no later than in 2 calendar days.

If the time of disclosure of the statement on the insider information of Rosneft falls on a non-business day, the indicated statement is subject to disclosure in the next business day coming after the non-business day.

9.4. In case when after disclosure or provision of the insider information by Rosneft the data contained in the indicated information is changed, then the relevant information shall be disclosed or provided by Rosneft according to the same procedure no later than the next business day after the day when Rosneft has learnt or should have learnt about such change.

9.5. The information included in the List of information related to the insider information of Rosneft loses the status of the insider information after disclosure:

9.6. The information about possessing of securities of Rosneft provided by the President of Rosneft, the members of the Board of Directors of Rosneft, the members of the Board of Rosneft or the members of the Auditing Committee of Rosneft according to the order envisaged by the Items 4.3., 6.2.11 of the present Regulations shall be disclosed in the yearly and quarterly reports of Rosneft.

10. RULES OF PROTECTION OF INSIDER INFORMATION CONFIDENTIALITY

10.1. Rosneft provides the necessary organizational and process conditions for adherence to the non-disclosure behavior established in Rosneft by the Insiders of Rosneft, and also implements the special measures oriented to protection of its insider information against misuse.

The stated measures are implemented to:

- ensure control of activity of the persons having an access to the insider information of Rosneft on the base of the established restrictions for its application;
- securing the observation of the application procedure with regard to the insider information of Rosneft, particularly, by elimination of risk of its misuse by the Insiders of Rosneft not for the benefit of Rosneft;
- increasing the level of credibility to Rosneft on the part of its investors, shareholders, and contractors.

10.2. In order to protect confidentiality of the insider information of Rosneft, particularly, against the unauthorized access, misuse or transfer of any data related to the insider information of Rosneft to the third parties, Rosneft develops and (or) applies the following measures:

- establishment of the mode of access to individual premises occupied by Rosneft (including the non-business days);
- identification of material media of the insider information and the handling rules for such material media;
- application of the privacy mark on the material media containing the insider information of Rosneft. The stated material media can be provided only to the Insiders of Rosneft;
- timely destruction of all material media which are not subject to storage (including document projects, drafts, etc.) and can contain the insider information of Rosneft using the method established by Rosneft;
- provision of an actual access to the insider information of Rosneft to the limited range of persons (including the employees of Rosneft representing direct executors and providing fulfillment of requirements of the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation"), while this refers only to the information necessary for execution of job duties by such persons within the provided authorities or rendering certain services on the base of the civil-law contracts entered into with Rosneft;
- provision of a right to access or restriction of a right to access to the insider information of Rosneft to the employees of Rosneft on the base of the labor contracts, other agreements or job description; to the third parties on the base of the civil-law contracts entered into with Rosneft;
- delimitation of rights and obligations of the employees of Rosneft, presence of the job description for each employee of Rosneft defining his/her job duties and rights (including the right to access to the insider information of Rosneft for performance of job duties);

- Obtainment of written obligations of non-disclosure of the insider and other confidential information of Rosneft from the employees of Rosneft and the third parties having access to the insider information of Rosneft;
- familiarization against written acknowledgement of all employees of Rosneft with the Board of Directors, as well as the Company Standard "Confidential information protection" No. PZ-11.03 S-0006 containing the lists of information representing commercial secret, the insider information, and the personal data related to the category "for official use only";
- use of the software and hardware means in Rosneft to prevent from unauthorized access to its insider information and to restrict circulation of such information around the communication channels (including e-mail and information-telecommunication network Internet);
- taking other measures directed towards restriction of the access to the insider information of Rosneft offered by the Official upon agreement with the President of Rosneft.

11. CONTROL OF OBSERVANCE OF REQUIREMENTS OF THE FEDERAL LAW NO. 224-FZ DATED 27.07.2010 "ON COUNTERMEASURE TO MISUSE OF THE INSIDER INFORMATION AND MARKET MANIPULATION AND ON MAKING ALTERATIONS IN CERTAIN LEGAL ACTS OF THE RUSSIAN FEDERATION"

11.1. The control of observance by Rosneft of the requirements of the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation" and the regulatory acts in the field of countermeasure to misuse of the insider information adopted in compliance with it is performed by the Official through the scheduled or selective inspections of the following:

- maintaining of the list of Insiders of Rosneft (including legality of add or removal of the persons to the List (from the List) of the Insiders of Rosneft);
- timeliness of notification of the persons of add to (removal from) the List of insiders of Rosneft;
- timeliness of notification of the Insiders of Rosneft of the transactions in financial instruments of Rosneft performed by them.

11.2. Following the results of the inspection performed by the Official directed towards control of observance by Rosneft of the requirements of the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation" and the regulatory acts in the field of countermeasure to misuse of the insider information adopted in compliance with it, the report shall be drawn in arbitrary form.

11.3. The report shall specify information on the period of inspection and the events that had occurred over the reporting period: about the fact of alterations made in the list of insiders of Rosneft (quantity of persons added to (removed from) the List of the Insiders of Rosneft) and about the quantity of received Notifications of transactions in financial instruments of Rosneft performed by the Insiders.

The report shall contain indication of the fact of observance or violation by Rosneft of the requirements of the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation" and the regulatory acts in the field of countermeasure to misuse of the insider information adopted in compliance with it.

In case when the inspection revealed any facts of violation of the requirements of the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation" and the regulatory acts in the field of countermeasure to misuse of the insider information adopted in compliance with it, the report shall include information about the nature of such violations and recommendations on elimination of the revealed violations and prevention from similar violations in future.

11.4. The report shall be submitted to the Audit Committee of the Board of Directors of Rosneft for preliminary consideration and to the Board of Directors of Rosneft.

12. RESPONSIBILITY FOR VIOLATION OF REQUIREMENTS OF THE FEDERAL LAW NO. 224-FZ DATED 27.07.2010 "ON COUNTERMEASURE TO MISUSE OF THE INSIDER INFORMATION AND MARKET MANIPULATION AND ON MAKING ALTERATIONS IN CERTAIN LEGAL ACTS OF THE RUSSIAN FEDERATION"

12.1. The Insiders which are the employees of Rosneft bear liability for misuse of the insider information of Rosneft and can be held disciplinarily, administratively, criminally or civil liable in compliance with the legislation of the Russian Federation and the terms of the labor contracts.

12.2. The Insiders which are not the employees of Rosneft bear liability for misuse of the insider information of Rosneft and can be held administratively, criminally or civil liable in compliance with the legislation of the Russian Federation and the terms of the civil-law contracts entered into with Rosneft.

12.3. Additionally, the persons which are not included into the list of insiders of Rosneft, who however have obtained an access to the insider information of Rosneft and have disseminated it, or who have performed transactions in financial instruments of Rosneft with the use of its insider information can also be held liable, except for the cases envisaged by the legislation of the Russian Federation and/or regulatory acts in the field of countermeasure to misuse of the insider information.

12.4. Rosneft is entitled to request the indemnification from the persons guilty of misuse and/or dissemination its insider information.

13. REFERENCES

1. Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation".
2. The Order of the Federal Financial Markets Service of Russia No. 13-51/pz-n dated 18.06.2013 "On approval of the Regulations on procedure of notification of the persons of add to the list of insiders and removal from such list; the Regulations on procedure of transfer of the lists of insiders to the trade organizers through which the transactions in financial instruments, foreign currency, and (or) goods are performed; the Regulations on procedure and time frames of referral of notifications by the insiders concerning transactions performed by them".
3. The Order of FFMS of Russia No. 11-18/pz-n dated 12.05.2011 "On approval of the List of information related to the insider information of the persons indicated in the Items 1 - 4, 11 and 12 of the Clause 4 of the Federal Law "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation", as well as procedure and time frames of disclosure of such information".
4. The Company Standard "Confidential information protection" No. PZ-11.03 S-0006 Version 4.00, approved by the Order of Rosneft No. 727 dd. 29.12.2012.

APPENDIXES

Table 1
List of Appendixes to the present Regulations of Rosneft

APPENDIX NUMBER	APPENDIX TITLE	NOTES
1	2	3
1	Form for individuals – Notification of add of person to the list of Insiders of Rosneft	Included in the present file
2	Form for legal bodies – Notification of add of person to the list of Insiders of Rosneft	Included in the present file
3	Form for individuals – Notification of removal of person from the list of Insiders of Rosneft	Included in the present file
4	Form for legal bodies – Notification of removal of person from the list of Insiders of Rosneft	Included in the present file
5	Form for individuals – Notification of transactions in financial instruments of Rosneft performed by Insider	Included in the present file
6	Form for legal bodies – Notification of transactions in financial instruments of Rosneft performed by Insider	Included in the present file

APPENDIX 1. FORM FOR INDIVIDUALS – NOTIFICATION OF ADD OF PERSON TO THE LIST OF INSIDERS OF ROSNEFT

To:

d
d “ ___ ” _____ 201__

No

• _____

FORM – for individuals

NOTIFICATION of add of person to the list of insiders

№	I. About Organization*	
1.1	Full legal name of Organization	Open Joint-Stock Company Rosneft Oil Company
1.2	Taxpayer Identification Number (INN) of Organization	7706107510
1.3	Primary State Registration Number (OGRN) of Organization	1027700043502
1.4	Registered address of Organization	Sofiyskaya Embankment 26/1, Moscow 115035 the Russian Federation
1.5	Alternative address for reception of mail by Organization	Sofiyskaya Embankment 26/1, Moscow 117997 the Russian Federation
1.6	Telephone number of Organization	+7 (499) 517-8899
1.7	Fax number of Organization	+7 (499) 517-7235
1.8	E-mail address of Organization	postman@rosneft.ru
1.9.	Full name of contact person responsible for maintenance of the list of insiders of Organization	
1.10.	Telephone number of contact person responsible for maintenance of the list of insiders of Organization	
1.11.	E-mail address of contact person responsible for maintenance of the list of insiders of Organization	
1.12.	Category of insider to which Organization refers**	Issuer, Item 1 of Clause 4 of the Law No. 224-FZ

№	II. Information about individual added to the list of insiders of Organization	
2.1	Full name of insider	
2.2	Date of birth of insider	
2.3	Place of birth of insider	
2.4.	Position held by individual in Organization	

№	III. Information about grounds for sending notification	
3.1	Type of event occurrence of which the person is notified	Add to the list of insiders

3.2	Date of occurrence of event of which the person is notified	
3.3	Number of item (items) of Clause 4 of the Law No. 224-FZ in compliance with which the person is added to the list of insiders	Item __ of Clause 4 of the Federal Law No. 224-FZ dated 27.07.2010
3.4	Grounds for add of the person to the list of insiders indicated in Item 2.8 of the Regulations***, or number of contract with individual added to the list of insiders due to conclusion of which the corresponding person has been added to the list of insiders	
3.5	Financial instrument in respect of which the person added to the Organization's list of insiders shall send notification of transactions performed by him/her in compliance with Clause 10 of the Law No. 224-FZ	

Please note that from the date of add of the person to the Organization's list of insiders, in respect of this person as an insider, the restrictions are implemented envisaged by the Clause 6 of the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation" (hereinafter referred to as Federal Law), the liability is determined in compliance with the Clause 7 of the Federal Law, and the liabilities are imposed on such person envisaged by the Clause 10 of the Federal Law.

(job title of authorized person of Organization)

(signature)

(initials and surname)

STAMP HERE

Notes:

* *Organization shall be understood to mean Rosneft.*

** *The category (categories) of the insider to which the Organization refers is indicated in compliance with the Clause 4 of the Federal Law; additionally, in respect of each category, the number of item of the Clause 4 of the Federal Law and description of the category according to the Federal Law shall be specified.*

*** *The Regulations on procedure of notification of the persons of add to the list of insiders and removal from such list approved by the Order of FFMS of Russia No. 13-51/pz-n dated 18.06.2013.*

APPENDIX 2. FORM FOR LEGAL BODIES – NOTIFICATION OF ADD OF PERSON TO THE LIST OF INSIDERS OF ROSNEFT

To:

d
d “ ___ ” _____ 201__

No

• _____

FORM – for legal bodies

NOTIFICATION of add of person to the list of insiders

№	I. About Organization*	
1.1	Full legal name of Organization	Open Joint-Stock Company Rosneft Oil Company
1.2	Taxpayer Identification Number (INN) of Organization	7706107510
1.3	Primary State Registration Number (OGRN) of Organization	1027700043502
1.4	Registered address of Organization	Sofiyskaya Embankment 26/1, Moscow 115035 the Russian Federation
1.5	Alternative address for reception of mail by Organization	Sofiyskaya Embankment 26/1, Moscow 117997 the Russian Federation
1.6	Telephone number of Organization	+7 (499) 517-8899
1.7	Fax number of Organization	+7 (499) 517-7235
1.8	E-mail address of Organization	postman@rosneft.ru
1.9.	Full name of contact person responsible for maintenance of the list of insiders of Organization	
1.10.	Telephone number of contact person responsible for maintenance of the list of insiders of Organization	
1.11.	E-mail address of contact person responsible for maintenance of the list of insiders of Organization	
1.12.	Category of insider to which Organization refers**	Issuer, Item 1 of Clause 4 of the Law No. 224-FZ

№	II. Information about legal body added to the list of insiders of Organization	
2.1	Full legal name of insider	
2.2	Taxpayer Identification Number (INN) of insider	
2.3	Primary State Registration Number (OGRN) of insider	
2.4.	Registered address of insider or address for reception of mails	

№	III. Information about grounds for sending notification	
3.1	Type of event occurrence of which the person is notified	Add to the list of insiders
3.2	Date of occurrence of event of which the person is notified	
3.3.	Number of item (items) of Clause 4 of the Law No. 224-FZ in compliance with which the person is added to the list of insiders	Item __ of Clause 4 of the Federal Law No. 224-FZ dated 27.07.2010
3.4.	Grounds for add of the person to the list of insiders indicated in Item 2.8 of the Regulations***, or number of contract with individual added to the list of insiders due to conclusion of which the corresponding person has been added to the list of insiders	
3.5	Financial instrument in respect of which the person added to the Organization's list of insiders shall send notification of transactions performed by him/her in compliance with Clause 10 of the Law No. 224-FZ	

Please note that from the date of add of the person to the Organization's list of insiders, in respect of this person as an insider, the restrictions are implemented envisaged by the Clause 6 of the Federal Law No. 224-FZ dated 27.07.2010 "On countermeasure to misuse of the insider information and market manipulation and on making alterations in certain legal acts of the Russian Federation" (hereinafter referred to as Federal Law), the liability is determined in compliance with the Clause 7 of the Federal Law, and the liabilities are imposed on such person envisaged by the Clause 10 of the Federal Law.

(job title of authorized person of Organization)

(signature)

(initials and surname)

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Notes:

* *Organization shall be understood to mean Rosneft.*

** *The category (categories) of the insider to which the Organization refers is indicated in compliance with the Clause 4 of the Federal Law; additionally, in respect of each category, the number of item of the Clause 4 of the Federal Law and description of the category according to the Federal Law shall be specified.*

*** *The Regulations on procedure of notification of the persons of add to the list of insiders and removal from such list approved by the Order of FFMS of Russia No. 13-51/pz-n dated 18.06.2013.*

APPENDIX 3. FORM FOR INDIVIDUALS – NOTIFICATION OF REMOVAL OF PERSON FROM THE LIST OF INSIDERS OF ROSNEFT

To:

Destination:

d
d “ ___ ” _____ 201 ___
No
• _____

FORM – for individuals

NOTIFICATION on removal of person from the list of insiders

№	I. About Organization*	
1.1	Full legal name of Organization	Open Joint-Stock Company Rosneft Oil Company
1.2	Taxpayer Identification Number (INN) of Organization	7706107510
1.3	Primary State Registration Number (OGRN) of Organization	1027700043502
1.4	Registered address of Organization	Sofiyskaya Embankment 26/1, Moscow 115035 the Russian Federation
1.5	Alternative address for reception of mail by Organization	Sofiyskaya Embankment 26/1, Moscow 117997 the Russian Federation
1.6	Telephone number of Organization	+7 (499) 517-8899
1.7	Fax number of Organization	+7 (499) 517-7235
1.8	E-mail address of Organization	postman@rosneft.ru
1.9.	Full name of contact person responsible for maintenance of the list of insiders of Organization	
1.10.	Telephone number of contact person responsible for maintenance of the list of insiders of Organization	
1.11.	E-mail address of contact person responsible for maintenance of the list of insiders of Organization	
1.12.	Category of insider to which Organization refers**	Issuer, Item 1 of Clause 4 of the Law No. 224-FZ

№	II. Information about individual removed from the list of insiders of Organization	
2.1	Full name of insider	
2.2	Date of birth of insider	
2.3	Place of birth of insider	
2.4.	Position held by individual in Organization	

№	III. Information about grounds for sending notification	
3.1	Type of event of which the person is notified	Removal from the list of insiders

3.2.	Date of occurrence of event of which the person is notified	
3.3.	Number of item (items) of Clause 4 of the Law No. 224-FZ in compliance with which the person is removed from the list of insiders	Item __ of Clause 4 of the Federal Law No. 224-FZ dated 27.07.2010
3.4.	Grounds for removal of the person from the list of insiders indicated in Item 2.9 of the Regulations***, or number of contract with individual removed from the list of insiders due to termination of which the corresponding person has been removed from the list of insiders	

(job title of authorized person of Organization)

(signature)

(initials and surname)

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Notes:

* *Organization shall be understood to mean Rosneft.*

** *The category (categories) of the insider to which the Organization refers is indicated in compliance with the Clause 4 of the Federal Law; additionally, in respect of each category, the number of item of the Clause 4 of the Federal Law and description of the category according to the Federal Law shall be specified.*

*** *The Regulations on procedure of notification of the persons of add to the list of insiders and removal from such list approved by the Order of FFMS of Russia No. 13-51/pz-n dated 18.06.2013.*

APPENDIX 4. FORM FOR LEGAL BODIES – NOTIFICATION OF REMOVAL OF PERSON FROM THE LIST OF INSIDERS OF ROSNEFT

To:

Destination:

d
d “ ___ ” _____ 201__

No

• _____

FORM – for legal bodies

NOTIFICATION on removal of person from the list of insiders

№	I. About Organization*	
1.1	Full legal name of Organization	Open Joint-Stock Company Rosneft Oil Company
1.2	Taxpayer Identification Number (INN) of Organization	7706107510
1.3	Primary State Registration Number (OGRN) of Organization	1027700043502
1.4	Registered address of Organization	Sofiyskaya Embankment 26/1, Moscow 115035 the Russian Federation
1.5	Alternative address for reception of mail by Organization	Sofiyskaya Embankment 26/1, Moscow 117997 the Russian Federation
1.6	Telephone number of Organization	+7 (499) 517-8899
1.7	Fax number of Organization	+7 (499) 517-7235
1.8	E-mail address of Organization	postman@rosneft.ru
1.9.	Full name of contact person responsible for maintenance of the list of insiders of Organization	
1.10.	Telephone number of contact person responsible for maintenance of the list of insiders of Organization	
1.11.	E-mail address of contact person responsible for maintenance of the list of insiders of Organization	
1.12.	Category of insider to which Organization refers**	Issuer, Item 1 of Clause 4 of the Law No. 224-FZ

№	II. Information about legal body removed from the list of insiders of Organization	
2.1	Full legal name of insider	
2.2	Taxpayer Identification Number (INN) of insider	
2.3	Primary State Registration Number (OGRN) of insider	
2.4.	Registered address of insider or address for reception of mails	

№	III. Information about grounds for sending notification	
3.1	Type of event of which the person is notified	Removal from the list of insiders
3.2	Date of occurrence of event of which the person is notified	
3.3	Number of item (items) of Clause 4 of the Law No. 224-FZ in compliance with which the person is removed from the list of insiders	Item __ of Clause 4 of the Federal Law No. 224-FZ dated 27.07.2010
3.4	Grounds for removal of the person from the list of insiders indicated in Item 2.9 of the Regulations***, or number of contract with individual removed from the list of insiders due to termination of which the corresponding person has been removed from the list of insiders	

(job title of authorized person of Organization)

(signature)

(initials and surname)

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Notes:

* *Organization shall be understood to mean Rosneft.*

** *The category (categories) of the insider to which the Organization refers is indicated in compliance with the Clause 4 of the Federal Law; additionally, in respect of each category, the number of item of the Clause 4 of the Federal Law and description of the category according to the Federal Law shall be specified.*

*** *The Regulations on procedure of notification of the persons of add to the list of insiders and removal from such list approved by the Order of FFMS of Russia No. 13-51/pz-n dated 18.06.2013.*

APPENDIX 5. FORM FOR INDIVIDUALS – NOTIFICATION OF TRANSACTIONS IN FINANCIAL INSTRUMENTS OF ROSNEFT PERFORMED BY INSIDER

to Rosneft
Sofiyskaya embankment 26/1,
Moscow 117997

or

to Bank of Russia
Leninsky Prospect 9, GSP-1,
Moscow 119991

FORM – for individuals

NOTIFICATION of transactions in financial instruments of Rosneft performed by Insider

1. Name of insider – individual	
2. Type and details of document of identification of insider – individual	Passport _____, issued by _____, on ____ . ____ . ____ .
3. Place of registration of insider – individual	
4. Full legal name of person to whose list of insiders the insider was added	Open Joint-Stock Company Rosneft Oil Company
5. Date of operation	
6. Type of transaction (operation)*	
7. Amount of transaction (operation)*	
8. Place of conclusion of transaction (name of trade organizer or over-the-counter market)**	
9. Type, category (type), series of security (indicated for securities transactions)	
10. Full legal name of security issuer (indicated for securities transactions)	
11. State registration number of security issue (indicated for securities transactions)	
12. Price of one security (indicated for all securities transactions except for repurchase transactions)	
13. Purchase and sale price of one security under repurchase agreement (for repurchase agreements)	
14. Quantity of securities (indicated for securities transactions)	
15. Type of contract representing derivative financial instrument (indicated for transactions in derivative financial instruments)	
16. Name (designation) of contract representing derivative financial instrument adopted at securities trade organizer (indicated for transactions in derivative financial instruments)	
17. Price of one contract representing derivative financial instrument (option price rate) (indicated for transactions in derivative financial instruments)	
18. Quantity of contracts representing derivative financial instruments (indicated for transactions in derivative financial instruments)	-

19. Price of execution of contract representing derivative financial instrument (indicated for transactions in derivative financial instruments)	-
--	---

(date)

(signature)

(full name)

Notes:

* *For example, purchase or sale of issuance securities (equity shares).*

** *For example, the MICEX Stock Exchange or the over-the-counter market.*

APPENDIX 6. FORM FOR LEGAL BODIES – NOTIFICATION OF TRANSACTIONS IN FINANCIAL INSTRUMENTS OF ROSNEFT PERFORMED BY INSIDER

to Rosneft
Sofiyskaya embankment 26/1,
Moscow 117997

or

to Bank of Russia
Leninsky Prospect 9, GSP-1,
Moscow 119991

FORM – for legal bodies

NOTIFICATION of transactions in financial instruments of Rosneft performed by Insider

1. Full legal name of insider – legal body	
2. Taxpayer Identification Number (INN) and Primary State Registration Number (OGRN) of insider – legal body	
3. Registered address of insider – legal body	
4. Full legal name of person to whose list of insiders the insider was added	Open Joint-Stock Company Rosneft Oil Company
5. Date of operation	
6. Type of transaction (operation)*	
7. Amount of transaction (operation)*	
8. Place of conclusion of transaction (name of trade organizer or over-the-counter market)**	
9. Type, category (type), series of security (indicated for securities transactions)	
10. Full legal name of security issuer (indicated for securities transactions)	Open Joint-Stock Company Rosneft Oil Company
11. State registration number of security issue (indicated for securities transactions)	
12. Price of one security (indicated for all securities transactions except for repurchase transactions)	
13. Purchase and sale price of one security under repurchase agreement (for repurchase agreements)	
14. Quantity of securities (indicated for securities transactions)	
15. Type of contract representing derivative financial instrument (indicated for transactions in derivative financial instruments)	
16. Name (designation) of contract representing derivative financial instrument adopted at securities trade organizer (indicated for transactions in derivative financial instruments)	
17. Price of one contract representing derivative financial instrument (option price rate) (indicated for transactions in derivative financial instruments)	
18. Quantity of contracts representing derivative financial instruments (indicated for transactions in derivative financial instruments)	

19. Price of execution of contract representing derivative financial instrument (indicated for transactions in derivative financial instruments)	
--	--

(date)

(signature)

(full name)

Notes:

* *For example, purchase or sale of issuance securities (equity shares).*

** *For example, the MICEX Stock Exchange or the over-the-counter market.*