APPROVED
by Resolution of
the Board of Directors of
“Surgutneftegas” PJSC,
Minutes No. 4p dated 08.02.2021

Regulations on the Procedure of Access to the Insider Information of “Surgutneftegas” PJSC, Rules for Protecting Confidentiality of Such Information and Monitoring Compliance with Regulatory Legal Acts (revised)

Surgut
2021

Article 1. General Provisions

1.1. These Regulations on the Procedure of Access to the Insider Information of “Surgutneftegas” PJSC, Rules for Protecting Confidentiality of Such Information and Monitoring Compliance with Regulatory Legal Acts (hereinafter – the Regulations) are developed in compliance with the current legislation of the Russian Federation.

1.2. The Regulations shall govern the use of the insider information of “Surgutneftegas” PJSC (hereinafter – the Company) and are developed to protect the rights and legal interests of the Company and its shareholders.

1.3. The Regulations shall apply to the management and control bodies as well as to the Company’s employees.

1.4. Director General of the Company shall determine (appoint) the business unit (official) in charge of monitoring compliance with Federal Law No. 224-FZ dated 27.07.2010 “On prevention of misuse of the insider information and market manipulation and on amending certain legislative acts of the Russian Federation” and regulatory acts applied therewith.

Article 2. Definitions of the Insider Information and Insider

2.1. The insider information shall mean accurate and specific information which has not been disclosed (including commercial, official, bank, communication secrets (with regard to information about postal money transfers) and other secrets protected by law), disclosure of which may significantly affect the price of financial instruments, foreign currency and (or) goods (including information concerning one or more issuers of equity securities, one or more management companies of investment funds, mutual investment funds and non-governmental pension funds or one or more financial instruments, foreign currency and (or) goods).

2.2. The Company’s insider information shall contain information which is on the List of the Company’s Insider Information.

2.3. The insider information shall not include:

any information that has become available to the general public, also as a result of its distribution;

research, estimates and assessments related to financial instruments, foreign currency and (or) goods made on the basis of publicly available information as well as recommendations and (or) proposals for transactions with financial instruments, foreign currency and (or) goods.

2.4. Insiders of the Company shall mean persons determined by the current legislation of the Russian Federation and included in the list of the Company’s insiders.

Article 3. Procedure for Using the Company’s Insider Information

3.1. Insiders of the Company shall have no right to use the Company’s insider information in any other way except as stipulated by the current legislation of the Russian Federation, the Regulations and other local regulations of the Company.

3.2. Insider of the Company shall:

observe the procedure for using the insider information established by the current legislation of the Russian Federation;

indemnify losses incurred by the Company as a result of a violation of the procedure for using the Company's insider information by an insider;

upon termination or dissolution of employment or other agreements with the Company, return to the Company any physical storage media that contain the Company's insider information;

comply with other requirements for protection of confidentiality of the Company's insider information provided for by the legislation of the Russian Federation, the Regulations and other local regulations of the Company and contracts (agreements) with the Company;

in cases and according to the procedure established by the current legislation of the Russian Federation, provide information about any transactions performed by the Company's insider with the Company's securities and conclusion of contracts being financial derivatives the price of which depends on such securities.

3.3. Insiders shall have no right to use the Company's insider information:

to conduct transactions with the Company's financial instruments, foreign currency and (or) goods to which such Company's insider information relates, at their own account or at the account of any third party, excluding transactions conducted to fulfill the obligation to buy or sell the Company's financial instruments, foreign currency and (or) goods upon maturity of such obligation, if such obligation has resulted from a transaction conducted before the Company's insider information became known to the person;

by passing the insider information to another person, except when the insider information is passed to a person included in the list of the Company's insiders, either in connection with fulfillment of obligations established by the federal laws of the Russian Federation or in connection with employment duties or execution of a contract;

by giving recommendations to the third parties thus binding or causing them to buy or sell the Company's financial instruments, foreign currency and (or) goods.

Article 4. Procedure of Access to the Company's Insider Information, Protection of Confidentiality of the Company's Insider Information

4.1. The Company shall provide equal opportunities to all interested parties for simultaneous access to the disclosed significant information about the Company's operations and take measures to refute unreliable information, if distribution of such information may have an adverse effect on the Company and/or its shareholders.

4.2. The Company shall have the right to introduce special procedures to protect the Company's insider information against unlawful use by providing special access to the Company's insider information, including the following:

to introduce the persons enumerated in Clause 2.4 of the Regulations to information that relates to the Company's insider information in accordance with Clause 2.2 of the Regulations, as well as to the established procedure for using the Company's insider information and to liability for a violation thereof;

to provide necessary conditions for the Company's insiders to follow the established procedure for using the Company's insider information;

to provide for the obligations of the Company's employees and the Company's counterparties related to the procedure for using the Company's insider information in the local regulations of the Company, employment and other agreements and to introduce liability for violations of this procedure: for the Company's employees –

liability for violations of labor discipline, for the counterparties of the Company – liability for violations of the contractual obligations;

to perform other actions to ensure the procedure for using the Company's insider information.

4.3. The Company shall notify the persons enumerated in Clause 2.4 of the Regulations about their inclusion in or exclusion from the list of the Company's insiders in compliance with the current legislation of the Russian Federation.

4.4. In case of any violation of the current legislation of the Russian Federation with regard to use and disclosure of the insider information and provisions of the Regulations that has resulted in losses incurred by the Company and (or) its shareholders, the Company's insiders responsible for such violations may be held liable under the current legislation of the Russian Federation.

Article 5. Disclosure of the Company's Insider Information

5.1. The Company shall disclose the Company's insider information to the extent, as and when and in compliance with the terms provided for by the regulatory legal acts of the Russian Federation.

5.2. The corporate secretary of the Company shall be responsible for submission of documents concerning the activity of the Company's Board of Directors and the general shareholders' meeting of the Company for further disclosure of the Company's insider information contained in such documents.

5.3. The Company shall provide the list of the Company's insiders to trade organizers as prescribed by the current legislation of the Russian Federation and established by trade organizers.

Article 6. Final Provisions

The Regulations as well as amendments and addenda hereto shall be approved by the Company's Board of Directors as prescribed by the Federal Law "On Joint Stock Companies" and the Company's Charter.