

List of Insider Information of “Surgutneftegas” PJSC

No.	List of Insider Information of “Surgutneftegas” PJSC
1.	Information on convening and holding a general shareholders’ meeting of “Surgutneftegas” PJSC (hereinafter – the Company), declaring the general shareholders’ meeting of the Company as not having been held, and resolutions adopted by a general shareholders’ meeting of the Company
2.	Information on holding a meeting of the Company’s Board of Directors and its agenda, and on certain resolutions adopted by the Company’s Board of Directors: - on proposing the general shareholders’ meeting of the Company to set a date as of when the persons entitled to dividends are determined in the resolution to pay (declare) dividends; - on placement or disposal of the Company’s securities; - on determination or the order of determination of the placement price for shares or securities which are convertible into the shares of the Company; - on forming an executive body of the Company and early termination (suspension) of its authorities, including authorities of a managing organization or a manager; - on including the nominated persons in the list of candidates for election during the annual General shareholders’ meeting of the Company regarding the election of the members to the Company’s Board of Directors; - on recommendations with relation to the amount of dividends on the Company’s shares and procedure for their payment; - on approval of the internal documents of the Company; - on authorizing or further approving of the Company’s transaction (several related transactions) recognized by the legislation of the Russian Federation as a major transaction and/or an interested party transaction, as well as other transaction (several related transactions) which is ten or more percent of the asset value as per the consolidated financial statements (financial statements) of the Company, and if the Company is not required to prepare and disclose the consolidated financial statements (financial statements), – as per the Company’s accounting (financial) statements as of the last reporting date (the last day of the last completed reporting period preceding the date of the resolution adoption to approve the transaction or the date of the transaction if a resolution to further approve it is adopted); - on delegation of authorities of the Company’s individual executive body, which is a business entity, to a managing organization or a manager, on approval of the managing organization or the manager and conditions of the contract between the Company and the managing organization or the manager; - on approval of the registrar that maintains the register of the Company’s securities holders, the agreement with the registrar concerning the maintenance of the register of the Company’s securities holders, and on the cancellation policy of this agreement
3.	Information on adopting a resolution about reorganization or dissolution of the person that has provided security for the Company’s bonds
4.	Information on evidence of bankruptcy of the Company or the person that has provided security for the Company’s bonds, as provided for by Federal Law No.127-FZ dated 26.10.2002 “On insolvency (bankruptcy)”
5.	Information on acceptance by an arbitration court of an insolvency (bankruptcy) notice in relation to the Company, and an award made by the arbitration court to declare the Company insolvent (bankrupt), initiate a bankruptcy procedure, or terminate bankruptcy proceedings in relation to the Company

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6.	Information on the date as of which the persons entitled to exercise the rights vested in the Company's securities are determined (fixed)
7.	Information on the Company's procedure of securities issuing
8.	Information on suspension and renewing of the Company's securities issuing
9.	Information on the recognition of the bond program as canceled, on the recognition of the issue (additional issue) of the Company's securities as canceled or invalid
10.	Information on the redemption of the Company's securities
11.	Information on the registration of changes made to the resolution about the issue of securities concerning the changes made to the scope of rights on the securities and/or the nominal value of securities, including their consolidation or split
12.	Information on the adopted resolution on acquisition (occurrence of reasons for acquisition) by the Company of the securities it placed
13.	Information on the income accrued (declared) and/or paid on the Company's securities, on other payments due to the holders of the Company's securities, and on the intention to fulfill the obligation to make payments on the Company's bonds, the rights to which are recorded in the register of the Company's securities holders
14.	Information on the inclusion of the Company's securities in the list of securities admitted to on-exchange trading for conclusion of the sales contracts by the Russian securities market operator or exclusion of such securities from this list, and on the inclusion of the Company's securities in the quotation list by the Russian stock exchange or exclusion of such securities from this list, and on the transfer of the Company's securities from one quotation list to another quotation list (on exclusion of the Company's securities from one quotation list and inclusion of those securities in another quotation list)
15.	Information on the inclusion of the Company's securities (depository securities) in the list of securities admitted to trading on a foreign organized (regulated) financial market, on inclusion of the mentioned securities in the quotation list by the foreign stock exchange, and on the exclusion of the Company's securities (depository securities) from the list of securities admitted to trading on a foreign organized (regulated) financial market, including the exclusion of the mentioned securities from the quotation list by the foreign stock exchange
16.	Information on the Company's failure to fulfill its obligations to holders of its securities as well as on changing the total number of bonds obligations for early redemption of which are not fulfilled
17.	Information on acquisition by a person or termination of the person's right to manage a certain number of votes in the Company's voting shares comprising the Company's charter capital as provided for by the Bank of Russia Regulation No.714-P dated 27.03.2020 "On Information Disclosure by Equity Securities Issuers"
18.	Information on the voluntary offer, including a competing offer, or a mandatory offer to acquire the Company's securities received by the Company as provided for by Chapter XI.1 of Federal Law No.208-FZ dated 26.12.1995 "On Joint Stock Companies" (hereinafter – Federal Law "On Joint Stock Companies"), and on any changes made to these offers
19.	Information on the notice about the right to demand repurchasing of the Company's securities or a demand to repurchase the Company's securities received by the Company as provided for by Chapter XI.1 of Federal Law "On Joint Stock Companies"

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20.	Information on any errors found in the Company's statements already disclosed (accounting (financial) statements, consolidated financial statements, financial statements)
21.	Information on any transaction conducted by the Company or any organization controlled by the Company which is material to the Company and the amount of such a transaction is ten or more percent of the asset value as per the consolidated financial statements of the Company (as per the Company's financial statements if the transaction is conducted by the Company which is not required to prepare and disclose the consolidated financial statements or as per the Company's accounting (financial) statements if the transaction is conducted by the Company which is not required to prepare and disclose the financial statements, or in the aggregate as per the accounting (financial) statements (aggregate asset value) of the Company and organization controlled by the Company which is material to the Company, if the Company is not required to prepare and disclose the consolidated financial statements and the transaction is conducted by the organization controlled by the Company which is material to the Company) as of the last reporting date (the last day of the last completed reporting period preceding the date of the transaction)
22.	Information on any interested party transaction conducted by the Company or organization controlled by the Company which is material to the Company
23.	Information on changes in the scope and/or amount of the collateral for the Company's collateral bonds
24.	Information on acquisition by the Company or termination of the Company's right to manage a certain number of votes in voting shares (stakes) comprising the charter capital of the organization whose securities are admitted to trading as provided for by the Bank of Russia Regulation No.714-P dated 27.03.2020 "On Information Disclosure by Equity Securities Issuers"
25.	Information on conclusion by the person controlling the Company or organization controlled by the Company of an agreement that requires to purchase the Company's securities
26.	Information on creation and/or termination of the right of holders of the Company's bonds to demand early redemption of the Company's bonds from the Company
27.	Information on rating securities and/or its Company as well as on changing the rating by a rating agency on the basis of an agreement concluded with the Company
28.	Information on any dispute related to establishment, management or participation in the Company or other dispute in which the Company is either an applicant or a respondent and the amount of claims in the dispute is ten or more percent of the book value of the assets as per the Company's accounting (financial) statements as of the last reporting date (the last day of the last completed reporting period prior to accepting a legal claim by a court)
29.	Information on placement of bonds and other financial instruments certifying loan obligations fulfilled at the Company's expense, outside the Russian Federation
30.	Information on the decision of the Bank of Russia to release the Company from an obligation to disclose the information in accordance with Article 30 of the Federal Law No.39-FZ dated 22.04.1996 "On the Securities Market"
31.	Information on acquisition (disposal) of the Company's voting shares or depositary securities representing rights on the Company's voting shares, by the Company or organization controlled by the Company

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32.	Information on holding a general meeting of holders of the Company’s bonds and the agenda thereof, on resolutions adopted by a general meeting of holders of the Company’s bonds, as well as on declaring the general shareholders’ meeting of the holders of the Company’s bonds as not having been held
33.	Information on appointment of bonds by the Company of the representative of holders of bonds after the registration of the issue of bonds
34.	Information on the date from which the representative of holders of the bonds shall exercise their powers
35.	Information on the conclusion by the Company of an agreement on novation or providing a compensation which causes termination of the obligations on the Company’s bonds
36.	Information on creation of the right of holders of the Company’s convertible securities to demand the conversion of the Company’s convertible securities belonging to them from the Company
36.1.	Information on the selected project (projects) by the Company which use (will use) money for financing and (or) refinancing received by placement of green bonds, social bonds, sustainable development bonds, adaptation bonds
36.2.	Information on carrying out an independent external evaluation of the issue (program) of green bonds, social bonds, sustainable development bonds, sustainability-linked bonds, adaptation bonds or the Company’s policy on the use of money received by placement of mentioned bonds or project (projects) which will use money for financing (refinancing) received by placement of mentioned bonds
36.3.	Information on carrying out an independent external evaluation of changes made in the Company’s policy on the use of money received by placement of green bonds, social bonds, sustainable development bonds, adaptation bonds
36.4.	Information on carrying out an independent external evaluation of changes made in the climate transition strategy of the Company as an issuer of climate transition bonds
36.5.	Information on the misuse of money received by placement of green bonds, infrastructure bonds, social bonds, sustainable development bonds, adaptation bonds, and information on ensuing of consequences of the misuse of specified money
36.6.	Information on contravention of principles and standards of financial instruments specified in the resolution on the issue of bonds, during implementation of a project (projects) which use money for financing and (or) refinancing received by placement of green bonds, social bonds, sustainable development bonds, adaptation bonds
36.7.	Information on including green bonds, social bonds, sustainable development bonds, adaptation bonds in the list of financial instruments of sustainable development, and information on excluding such bonds from this list
36.8.	Information on achievement or non-achievement of interim (if any) or final target values of key performance indicator (indicators) of the Company as an issuer of sustainability-linked bonds
36.9.	Information on achievement or non-achievement of interim or final values of key performance indicators of the Company as an issuer of climate transition bonds
37.	Information on other events (actions) which, in the Company’s opinion, significantly affect the price or quotations of its securities

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38.	Information comprising the annual consolidated financial statements (financial statements) of the Company and the interim consolidated financial statements (financial statements) of the Company for the reporting period of six months of the reporting year as well as information included in the auditors' reports prepared with respect to such statements or other document based on the audit of the interim consolidated financial statements (financial statements) in accordance with the auditing standards
39.	Information included in the Company's annual reports of the Company, excluding any information that has already been disclosed
40.	Information comprising the Company's annual accounting (financial) statements with the information included in the auditor's report prepared with respect to such statements if such statements were audited
41.	Information comprising the Company's interim accounting (financial) statements for the reporting period of three, six or nine months of the reporting year with the information included in the auditors' reports prepared with respect to such statements in case such statements were audited
42.	Information contained in the reports of the issuers of equity securities of the Company, excluding any information that has already been disclosed
43.	Information comprising the report of the issuer, consolidated financial statements (financial statements) and accounting (financial) statements for the periods of time other than specified in Clauses 38, 40-42 of this list, the disclosure of which may significantly affect the price of the Company's securities admitted to on-exchange trading (in relation to which an order to admit to on-exchange trading is submitted)
44.	Information included in the prospectus of the Company's securities, excluding any information that has already been disclosed
45.	Information comprising the terms and conditions for placement of securities, as defined in a separate document by the Company, excluding any information that has already been disclosed (in case there is no prospectus or no placement terms for securities in the prospectus)
46.	Information on concluding by the Company an agreement (transaction), excluding agreements (transactions) stipulated by Subclauses 13.9.21, 13.9.22 and 13.9.27 of Clause 13.9 of the Bank of Russia Regulation No.714-P dated 27.03.2020 "On Information Disclosure by Equity Securities Issuers", if the conclusion of such agreement (transaction) may significantly affect the price of securities of the Company admitted to on-exchange trading (in relation to which an order to admit to on-exchange trading is submitted)
47.	Information on taking interim measures (including arrest) by a court, an arbitration court, Federal Bailiffs Service with respect to cash or other property of the Company, any organization controlling the Company, organization controlled by the Company which is material to the Company or any person that has provided security for the Company's bonds admitted to on-exchange trading (in relation to which an order to admit to on-exchange trading is submitted) which is not the Russian Federation, that has provided the government guarantee of the Russian Federation, constituent of the Russian Federation, that has provided the guarantee of the constituent of the Russian Federation, or municipal entity that has provided the guarantee of the municipal entity amounting to ten or more percent of the book value of such persons' assets as of the last day of the last completed reporting period prior to taking interim measures

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48.	Information on acquisition by a person or termination of the person's right to manage, either directly or indirectly (through other persons controlled by such a person), independently or together with other persons connected with such a person by a trust management contract and/or simple partnership agreement and/or instruction and/or shareholder agreement and/or any other agreement the subject of which is the exercise of rights represented by the shares (stakes) of an organization that has provided security, guarantee or pledge for the Company's bonds, admitted to on-exchange trading (in relation to which an order to admit to on-exchange trading is submitted), if the entity that has provided such security, guarantee or pledge for such bonds is not the Russian Federation, that has provided the government guarantee of the Russian Federation, constituent of the Russian Federation, that has provided the guarantee of the constituent of the Russian Federation, or municipal entity that has provided the guarantee of the municipal entity for a certain number of votes in voting shares (stakes) comprising the charter capital of such an organization, if the specified number of votes is five percent or has become higher or lower than five, ten, fifteen, twenty, twenty-five, thirty, fifty, seventy-five or ninety-five percent of the total number of votes in voting shares (stakes) comprising the charter capital of such an organization
49.	Information on the circumstances provided by Paragraph 2, Subclause 23, Clause 1, Article 2 of Federal Law No.39-FZ dated 22.04.1996 "On the Securities Market" which, depending on their occurrence or non-occurrence, determine the payments or lack thereof on structural bonds of the Company admitted to on-exchange trading (in relation to which an order to admit to on-exchange trading is submitted) (including payments during redemption of structural bonds) (hereinafter – Circumstances) including numerical values (parameters, conditions) or the order of their determination, as well as the amount of payments for one structural bond (including the amount of payment for redemption of a structural bond) or the order of its determination (in case such information is contained in the resolution on the issue of structural bonds)
50.	Information on numerical values (parameters, conditions) of the Circumstances or the order of their determination and the amount of payment for a structural bond (including the amount of payment for redemption of a structural bond) or the order of its determination if they are established by the authorized body of the Company before the placement of structural bonds in accordance with Subclauses 1 and 2, Clause 3, Article 27.1-1 of Federal Law No.39-FZ dated 22.04.1996 "On the Securities Market" (in case such information is not contained in the resolution on the issue of structural bonds)
51.	Information on initiating a criminal case, received by the Company from the preliminary investigation bodies or inquiry agencies, against a member of the company's authorized management body, any organization controlling the Company, organization controlled by the Company which is material to the Company, or any person that has provided security for the Company's bonds admitted to on-exchange trading (in relation to which an order to admit to on-exchange trading is submitted)
52.	Information contained in materials used by the Company's management bodies excluding the general shareholders' meeting, to make decisions which may significantly affect the price of securities of the Company admitted to on-exchange trading (in relation to which an order to admit to on-exchange trading is submitted), excluding any information that has already been disclosed
53.	Information on accidents occurred on the Company's hazardous industrial facilities determined in accordance with Federal Law No.116-FZ dated 21.07.1997 "On

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	Industrial Safety of Hazardous Industrial Facilities”, if such information may significantly affect the price of securities of the Company admitted to on-exchange trading (in relation to which an order to admit to on-exchange trading is submitted)