ENVIRONMENTAL POLICY OF GAZPROM

1. GENERAL PROVISIONS

Gazprom is a global energy company focused on geological exploration, production, transportation, storage, processing and sales of natural gas, gas condensate and oil, as well as generation of electric power in Russia and abroad.

Gazprom and its subsidiary companies and organizations form a vertically integrated company (hereinafter the “Company”), in which Gazprom is the parent company that defines the general development strategy.

Gazprom’s strategy is to establish itself as a leader among global energy companies. This implies a responsible attitude toward preserving a healthy environment for the present and future generations.

The Gazprom Environmental Policy is based on the Constitution of the Russian Federation, federal laws and other regulations of the Russian Federation, as well as international regulatory documents related to environmental protection and sustainable use of natural resources.

The Environmental Policy is a document outlining Gazprom’s official position on the Company’s role and commitments regarding the preservation of a healthy environment in the regions where the Company operates.

The Environmental Policy is the basis for setting medium-term corporate environmental goals, and it should be taken into account in the drawing up of the Company’s prospective development programs.

The Environmental Policy is communicated to each of the Company’s employees and should become a guideline for all of the Company’s partners without exception.

The Environmental Policy is to be reviewed, amended, and updated in case of changes in the Company’s development priorities and operational conditions in compliance with the procedures established by Gazprom’s environmental management system.

2. COMPANY COMMITMENTS

Gazprom declares its commitment to the principles of sustainable development construed as a well-balanced and socially acceptable combination of economic growth and preservation of a healthy environment for future generations.

Accordingly, the Company undertakes to pursue, and require the fulfillment of, the following commitments by its partners, contractors and counterparts:

1) To guarantee compliance with the environmental standards and requirements set by the Russian laws and international regulations related to environmental protection, as well as the laws of the countries where the Company runs its business.

2) To reduce adverse environmental impacts, ensure resource management, and make every effort to preserve the climate and biodiversity and compensate for possible environmental damage.

3) To employ a proactive approach in preventing adverse environmental impacts, which means prioritizing preventive actions over the actions aimed at eliminating the consequences of such impacts.

4) To guarantee compliance with environmental safety standards and requirements when developing hydrocarbon fields on the continental shelf and in the Russian Arctic.

5) To enhance the energy efficiency of operations and take steps to reduce greenhouse gas emissions.
6) To provide for the mitigation of environmental risks at all stages of investment projects, including with regard to natural sites with increased vulnerability and specially protected natural areas.

7) To take into account the interests of indigenous minorities and their rights to maintaining traditional lifestyles and preserving their native habitat.

8) To engage the Company’s personnel in the activities aimed at environmental risk reduction and the continuous improvement of the environmental management system and environmental performance.

9) To strengthen the competence and awareness of the Company’s employees in dealing with environmental issues.

10) To ensure the broad availability of information regarding the Company’s environmental protection efforts and related decisions.

3. ENVIRONMENTAL POLICY IMPLEMENTATION MECHANISMS

The key mechanisms for fulfilling the commitments under this Environmental Policy are as follows:

– support for and improvement of the corporate environmental management system based on the international ISO 14001 standard;

– establishment of measurable corporate environmental objectives to mitigate adverse environmental impacts and provision of resources required for the implementation thereof;

– mainstreaming of environmental aspects and assessment of risks during activity planning and investment project development and implementation;

– provision of industrial environmental control and monitoring, as well as environmental impact assessments with respect to the Company’s business activities;

– execution of gasification programs in Russian population centers;

– comprehensive development of NGV markets in Russia and abroad;

– participation in global environmental programs and projects for sustainable development in the regions where the Company operates;

– promotion of scientific research and implementation of innovative projects aimed at increasing energy efficiency, as well as use of renewables and unconventional energy resources;

– application of best available technologies at different stages of production activities, including procurement of technologies, materials and equipment;

– insurance against high environmental risks;

– measures aimed at making sure that all of the Company’s employees study, understand, and comply with the applicable legal and other requirements related to the environmental aspects of the Company’s activities in the regions where it operates;

– betterment of the environmental training system for the Company’s personnel;

– engagement of all of the Company’s employees in the activities related to the environmental management system;

– interaction with institutions and persons interested in enhancing the Company’s environmental safety;

– communication of the Environmental Policy commitments to all persons working for the Company or on its behalf, including subcontractors working at the Company’s facilities.