

APPROVED

Resolution of the Management Committee
PJSC Gazprom

No. 47 dated December 8, 2016

as amended by

Resolution of the Management Committee
PJSC Gazprom

No. 36 dated September 27, 2018

Procedure for Providing Information about Gazprom to Shareholders

This Procedure was developed with the purpose of securing the rights of the shareholders of Gazprom (hereinafter the “Company”) to obtain information about the Company’s activities.

1. General

1.1. This Procedure sets the rules governing access to the Company’s documents and copies thereof at the request (hereinafter the “Request”) of the shareholders and other authorized persons in accordance with applicable laws (hereinafter the “Eligible Persons”).

1.2. The Company shall provide the Eligible Persons, upon request, with access to the documents specified in Article 91 Clause 1 of the Federal Law on Joint Stock Companies.

1.2.1. The Company shall provide access to the information and documents specified in Article 91 Clause 2 of the Federal Law on Joint Stock Companies at the request of the Eligible Persons holding no less than 1 per cent of the Company’s voting shares.

1.2.2. The Company shall provide access to the documents specified in Article 91 Clause 5 of the Federal Law on Joint Stock Companies at the request of the Eligible Persons holding no less than 25 per cent of the Company’s voting shares.

1.2.3. A list of persons entitled to participate in the General Shareholders Meeting, excluding information on the expression of will of such persons, shall be made available by the Company at the request of the persons included in the list and holding no less than 1 per cent of the votes. However, personally identifiable information of the natural persons listed, except for their full names, shall only be provided with the consent of such persons.

1.3. The Company shall, upon the Request of the Eligible Persons having the right to access the documents specified in Clause 1.2 hereof, provide the aforementioned persons with copies of the documents in question.

1.4. Access to the Company’s documents and copies thereof shall be granted in accordance with the Company’s confidentiality requirements.

2. Document provision terms

2.1. The Eligible Person's Request for access to documents or provision of copies thereof shall specify the following:

- data on the individual shareholder's surname, first name and patronymic (if any) or the entity shareholder's full company name and Primary State Registration Number (OGRN) (or any other identification number if the Request is made by a foreign legal entity) or data identifying other Eligible Persons;
- postal address for communication with the Eligible Person on behalf of which the Request is made;
- list of the Company's documents (compiled by type and date of creation) to be provided;
- type of access to the Company's documents;
- method of delivery if the chosen type of access entails the provision of copies of the Company's documents;
- certification requirements (if any) if the chosen type of access entails the provision of copies of the Company's documents;
- permissibility of copying the Company's documents at the Eligible Person's discretion if the chosen type of access entails the provision of the Company's documents for viewing purposes;
- signing date of the Request and signature of the Eligible Person.

2.1.1. The Request for access to the documents and information specified in Clause 1.2 Sub-Clause 1.2.1 hereof by the Eligible Person(s) holding less than 25 per cent of the Company's voting shares shall specify the business purpose for which the documents are requested.

A business purpose shall mean a legitimate interest of the Eligible Person in obtaining data and documents that are reasonably required and sufficient for the proper exercise of the shareholder rights stipulated by the Federal Law on Joint Stock Companies. In certain cases, a business purpose cannot be considered reasonable, in particular if:

- 1) the Company is aware of factual circumstances revealing a lack of good faith on the part of the Eligible Person;
- 2) the Eligible Person shows an unwarranted interest in obtaining the requested documents or information;
- 3) the Eligible Person is a competitor of the Company or an affiliate of a competitor, the requested document contains confidential information of competitive nature, and its disclosure may cause harm to the commercial interests of the Company.

2.2. The Eligible Person's Request may include additional information listing the Company's documents to be provided and the type of access thereto.

2.3. If the Request is signed by a representative of the Eligible Person acting under a power of attorney, such Request shall be supplemented with the power of attorney (or a duly certified copy thereof) issued in accordance with Russian law and containing information about the person/entity being represented, the representative, and the

representative's authority.

2.4. If the Request is signed by the Eligible Person (or his/her representative) whose rights to shares are registered on a depository account in a depository, such Request shall be supplemented with a statement of the Eligible Person's depository account issued by the depository in question. If the Eligible Person's rights to shares are registered with a foreign depository, the Request shall be supplemented with a document issued by such depository to confirm the existence of such shares and amount thereof on the account of such Eligible Person. Moreover, such statement (or a document issued by a foreign depository) shall confirm the amount of shares on the depository account of the Eligible Person as of the date not earlier than seven (7) business days prior to the Request's sending date.

2.5. If the Request is signed by the Eligible Person (or his/her representative) whose shares were acquired in accordance with Articles 76, 84.7 or 84.8 of the Federal Law on Joint Stock Companies and is related to the aforementioned acquisition, such Request shall be supplemented with a statement confirming the amount of shares on the account of the Eligible Person as of the date preceding such acquisition.

2.6. If the Request is signed by the authorized representative of a person acting as a fiduciary manager of the Company's shares under a trust management agreement, such Request shall be supplemented with a duly certified copy of that agreement (or a duly certified extract from the agreement specifying the rights transferred to the manager) confirming the person's authority to exercise relevant shareholder rights.

2.7. If the Request is signed by the bankruptcy manager of a legal entity holding the Company's shares and involved in bankruptcy proceedings, such Request shall be supplemented with the arbitration court's decision (or a duly certified copy thereof) on approving the aforementioned person as a bankruptcy manager.

2.8. The Request can be submitted to the Company in the following ways:

- sent by post or courier service to the location of the Company's executive body registered in the Unified State Register of Legal Entities and to the addresses available on the Company's website;
- hand-delivered against signature to a person authorized to receive the Company's official correspondence.

2.9. The Request's sending date shall be:

- the date shown in the postmark impression confirming the posting date if the Request is sent by post;
- the date of pickup by courier service for dispatch if the Request is sent via courier service;
- the delivery date if the Request is hand-delivered against signature.

2.10. The Request's submission date shall be:

- the date of receipt by the addressee if the Request is sent with an unregistered letter or by other uninsured postal deliveries;
- the date of delivery to the addressee against signature if the Request is sent with a registered letter or by other insured postal deliveries;
- the date of delivery by a courier if the Request is sent via a courier service;
- the date of delivery if the Request is hand-delivered against signature.

2.11. If the received Request lacks any prescribed information listed in Clause 2.1 hereof or documents to be attached as set out in Clauses 2.3–2.7 hereof, the Company shall send a letter describing the missing information and/or documents to the Eligible Person within seven (7) business days from the Request's submission date.

3. Document provision procedure

3.1. Access to the documents listed in Clause 1.2 hereof shall be granted within seven (7) business days from the submission date of such Request by the Eligible Person (excluding the cases when the Request specifies a later date) on the premises of the Company's executive body.

3.2. Copies of the documents shall be sent to the address specified in the Request of the Eligible Person within seven (7) business days from the Request's submission date.

The payment charged by the Company for providing copies of documents cannot exceed the costs of duplication services and the corresponding shipping costs if the Request identifies the need to send the copies to the address provided by the Eligible Person.

The Company's website contains information about the duplication costs for the documents submitted to the Eligible Persons in accordance with their Requests, as well as the Company's bank details for transferring the payment.

3.3. If the Company sends an inquiry letter to the Eligible Person pursuant to Clause 2.11 hereof, the time period set out in Clauses 3.1–3.2 hereof shall commence on the date of receipt of the complete information and all the necessary documents by the Company.

3.4. If the Request (or Requests received simultaneously) by the Eligible Person asks for copies of a considerable amount of the Company's documents (over 10 documents and/or over 200 pages), the time period set out in Clauses 3.1–3.2 hereof can be extended for a period not exceeding twenty (20) business days so as to fulfill such Request.

In this case, the Company shall notify the Eligible Person of the time extension and causes thereof no later than seven (7) business days from the Request's submission date.

3.5. In case of the Eligible Person's failure to pay the Company's costs for making copies of the Company's documents under a Request submitted and fulfilled earlier, the time period for the provision of copies under subsequent Requests shall commence as soon as the payment is made.

3.6. The Company's documents containing state, commercial and other legally protected secrets, as well as personal data, shall be provided in accordance with applicable laws.

4. Grounds for refusal to satisfy Eligible Person's Request for access to information

4.1. The Company has the right to deny access to documents and information if at least one of the following conditions occurs:

- 1) the soft copy of the requested document is openly available on the Company's website or has been disclosed in the manner prescribed by Russian securities laws regarding information disclosure at the time of submission of the Request by the Eligible Person(s);
- 2) the document has already been requested within the last three years, provided that the first Request for access thereto was duly fulfilled by the Company;
- 3) the document relates to a past period of the Company's operation (over three years prior to the date of the Request), except for the information on transactions obligations under which are carried out at the moment of filing of the Request by the Eligible Person;
- 4) the Request by the Eligible Person(s) for document provision does not indicate the business purpose for which the document is requested in cases when such indication is required in accordance with the Federal Law on Joint Stock Companies, or the indicated purpose is not reasonable, or the list and contents of the requested documents clearly do not correspond to the purpose specified in the Request;
- 5) the person that has filed the Request for access to documents does not have the right of access to the relevant category of documents in accordance with Clause 1.2, Clause 1.2 Sub-Clauses 1.2.1 and 1.2.2, and Clause 2.1 Sub-Clause 2.1.1 hereof;
- 6) the document relates to the periods during which the Eligible Person was not holding the Company's shares as confirmed by this Eligible Person via a statement on his/her personal account listed on the Company's shareholders register or a depository account in a depository, except for the information about transactions obligations under which are carried out in the period when the Eligible Person is holding the Company's shares.