

REGULATION ON MONITORING COMPLIANCE WITH LAWS ON COUNTERING ILLEGAL USE OF INSIDER INFORMATION AND MARKET MANIPULATION AT PJSC GAZPROM

1. GENERAL PROVISIONS

1.1. This Regulation has been developed pursuant to Federal Law No. 224-FZ dated July 27, 2010, on Countering the Illegal Use of Insider Information and Market Manipulation and on Amending Certain Legislative Acts of the Russian Federation (hereinafter referred to as the “Law”), for the purpose of monitoring compliance with the requirements set forth by the Law and the regulatory acts adopted thereunder.

1.2. In order to monitor compliance with the requirements set forth by the Law and the regulatory acts of PJSC Gazprom (hereinafter referred to as the “Company”) adopted thereunder, the Company shall designate a structural unit (hereinafter referred to as the “Monitoring Unit”). The Monitoring Unit shall be designated in an order issued by the Company and shall report to the Chairman of the Company’s Management Committee.

1.3. This Regulation sets forth the general principles of establishing a system to monitor the Company’s compliance with the Law and the regulatory acts adopted thereunder.

2. SYSTEM FOR MONITORING COMPANY’S COMPLIANCE WITH LAW AND REGULATORY ACTS ADOPTED THEREUNDER

2.1. The monitoring system includes the following:

- identifying the types of data to be considered insider information;
- overseeing the inclusion of insider information into the List of Insider Information of PJSC Gazprom kept by the Company;
- ensuring that the List of Insider Information of PJSC Gazprom is complete and up-to-date;
- ensuring that the List of Insider Information of PJSC Gazprom is made available at the Company’s website www.gazprom.com;
- overseeing the maintenance of the insiders list, inclusion/removal of insiders into/from the insiders list and notification of insiders thereon;
- ensuring the fulfillment of the obligation to send the insiders list to the trade organizers facilitating transactions in financial instruments, at their request and according to the procedure established by the Bank of Russia regulation, and also to the Bank of Russia at its request;
- drafting local regulatory acts of the Company on countering the illegal use of insider information and market manipulation (hereinafter referred to as the “local regulatory acts of the Company”);
- determining the areas of potential illegal use of insider information;
- ensuring that the structural units of the Company working with insider information observe the requirements of the Law and the regulatory acts adopted thereunder, as well as the local regulatory acts of the Company;
- overseeing the procedure and timing of disclosure and provision of insider information;
- consulting employees of the Company on issues related to the Law and the regulatory acts adopted thereunder, as well as the local regulatory acts of the Company;
- ensuring that the Company’s internal documents meet the requirements of the Law and the regulatory acts adopted thereunder.

2.2. The functioning of the Company’s system for monitoring compliance with the Law and the regulatory acts adopted thereunder shall be ensured by the Monitoring Unit.

2.3. Structural units of the Company shall enforce the requirements of the Law and the regulatory acts adopted thereunder, as well as the local regulatory acts of the Company, in accordance with their assigned duties and functions.

3. MONITORING UNIT

3.1. For the purpose of preventing, detecting and countering the illegal use of insider information and/or market manipulation, the Monitoring Unit shall monitor compliance with the requirements set forth by the Law and the regulatory acts adopted thereunder, as well as the local regulatory acts of the Company.

3.2. The Monitoring Unit shall continuously support the functioning of the monitoring system so as to:

- assess whether the system is commensurate with the Company’s mission;
- identify its shortcomings;
- formulate proposals to improve the monitoring system and oversee the implementation thereof.

3.3. The Monitoring Unit shall take necessary measures to improve the monitoring system with the purpose of ensuring its effective operation, with due consideration of changes in the internal and external factors affecting the Company’s activities.

3.4. The Monitoring Unit shall report annually to the Chairman of the Company’s Management Committee on the results of its activities within the framework of this Regulation.