

**The purpose of protecting insider information** is to ensure fair pricing for financial instruments<sup>1</sup> and to provide for equality between investors and enforcement of their trust.

**Insiders of Gazprom (hereinafter also referred to as the “Company”)** means the individuals and entities included in the Company’s insiders list pursuant to the requirements of the Law<sup>2</sup>, including:

- the Chairman and Members of the Company’s Board of Directors, the Chairman and Members of the Company’s Management Committee, the Chairman and Members of the Company’s Audit Commission;
- individuals who have access to insider information on the basis of labor and civil contracts signed with the Company;
- legal entities who have access to the Company’s insider information on the basis of contracts signed with the Company.

All individuals and entities included in or removed from the Company’s insiders list are notified thereof in writing by the Company.

**Insider information** means restricted information the content of which is disclosed in accordance with the established procedure and, if disseminated or disclosed by the insider in excess of/prior to its disclosure performed in accordance with the established procedure, could have a significant impact on the price of financial instruments.

If such information becomes publicly available, it ceases to be insider information.

Studies, forecasts, and assessments with regard to financial instruments carried out on the basis of publicly available information are not considered insider information.

The List of insider information of the Company was approved by the Company’s Order No. 527 dated November 22, 2021 (subject to subsequent amendments). The List of insider information of the Company is published on the Company’s official Internet website (section *Investors*, subsection *Information disclosure / Information for insiders / List of insider information*). The Company can introduce amendments and/or additions to the List of insider information by issuing a relevant order.

### **The Company’s insider shall:**

#### **(1) Ensure that insider information is not:**

(1.1.) Used for carrying out any transactions with financial instruments<sup>3</sup> at the expense of either the insider or a third party, except for transactions carried out to discharge a mature obligation to buy or sell financial instruments, if such obligation was created as a result of a transaction which had been performed before insider information became known to the individual or entity.

(1.2.) Communicated to another individual or entity, except for the cases when such information is communicated to an individual or entity included in the Company’s insiders list, and/or in connection with the performance of obligations stipulated by federal laws, and/or in connection with the fulfillment of employment duties or performance of a contract.

(1.3.) Used in the provision of recommendations to third parties, or for putting them under an obligation, or for prompting them in any other way to purchase or sell financial instruments.

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<sup>1</sup> Financial instrument is a security or a derivative. A derivative is an agreement, except for a repo agreement, which stipulates an obligation or several obligations provided for by Article 2 of Federal Law No. 39-FZ dated April 22, 1996, on Securities Market.

<sup>2</sup> 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”).

<sup>3</sup> Transactions with financial instruments are deals and other actions performed with the aim of purchasing, disposal or other variation of rights to financial instruments, as well as actions related to the assumption of the obligations to perform said actions, including placement of bids (issuance of orders) or cancellation of such bids (Article 2 of the Law).

2 (2) **Preclude any market manipulation actions**, that is, willful acts which are described as such in the laws of the Russian Federation on countering the illegal use of insider information and market manipulation or in the regulatory acts of the Bank of Russia and as a result of which the price of, demand for, supply of, or trading volume of any of financial instruments deviated from (or was kept at a level significantly different from) the level which would have been observed if no such actions had been taken, namely<sup>4</sup>:

(2.1.) Intentional spread of information which is known to be false via the mass media, data and telecommunications networks open to the general public (including the Internet), and/or in any other way, as a result of which the price of, demand for, supply of, or trading volume of any of financial instruments deviated from (or was kept at a level significantly different from) the level which would have been observed if no such information had been spread.

(2.2.) Conduct of transactions with any of financial instruments under a prior agreement made between trading participants and/or their employees and/or individuals bearing the expenses for or benefiting from said transactions, as a result of which the price of, demand for, supply of, or trading volume of any of financial instruments deviated from (or was kept at a level significantly different from) the level which would have been observed if no such transactions had been carried out.

The provisions of this sub-clause shall apply to organized trading where transactions are carried out on the basis of bids addressed to all trading participants if the information on the individuals and/or entities that submitted bids (and on the individuals and/or entities in whose interests bids were submitted) is not disclosed to other trading participants.

(2.3.) Conduct of deals under which the obligations of parties thereto are performed at the expense or for the benefit of a single individual or entity, as a result of which the price of, demand for, supply of, or trading volume of any of financial instruments deviated from (or was kept at a level significantly different from) the level which would have been observed if no such deals had been performed.

The provisions of this sub-clause shall apply to organized trading where deals are performed on the basis of bids addressed to all trading participants if the information on the individuals and/or entities that submitted bids (and on the individuals and/or entities in whose interests bids were submitted) is not disclosed to other trading participants.

(2.4.) Placement of bids at the expense or for the benefit of a single individual or entity, as a result of which two and more bids with opposite effect are present during organized trading and such bids offer a purchase price for a financial instrument which exceeds or equals the selling price for a similar financial instrument, if such bids became a basis for transactions as a result of which the price of, demand for, supply of, or trading volume of any of financial instruments deviated from (or was kept at a level significantly different from) the level which would have been observed if no such transactions had been carried out.

The provisions of this sub-clause shall apply to organized trading where transactions are carried out on the basis of bids addressed to all trading participants if the information on the individuals and/or entities that submitted such bids (and on the individuals and/or entities in whose interests such bids were submitted) is not disclosed to other trading participants.

(2.5.) Repeated conduct of deals within a single day of organized trading which are performed at the expense or for the benefit of a single individual or entity on the basis of bids which, at the moment of their placement, offer the highest purchase price or the lowest selling price for a financial instrument, as a result of which their price significantly deviated from the level which would have been observed if no such deals had been performed, and which were aimed at the subsequent performance of opposite deals at such prices at the expense or for the benefit of the same or another individual or entity, and actual subsequent performance of such opposite deals.

(2.6.) Repeated conduct of deals within a single day of organized trading which are performed at the expense or for the benefit of a single individual or entity with the aim of making a misrepresentation as to the price of a financial instrument as a result of which the price of the corresponding financial instrument was kept at a level significantly different from the level which would have been observed if no such deals had been performed.

(2.7.) Repeated failure to perform obligations under transactions which were carried out during organized trading without the intention to actually perform them and which involved the same financial instrument, as a result of which

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<sup>4</sup> The list of actions is provided in Article 5 of the Law.

3 the price of, demand for, supply of, or trading volume of the financial instrument deviated from (or was kept at a level significantly different from) the level which would have been observed if no such transactions had been carried out. Said acts shall not be deemed to constitute market manipulation if obligations under the above-described transactions were terminated on the grounds provided for by the rules of a relevant trade organizer and/or clearing company.

(2.8.) Performance of other acts the comprehensive list of which is provided in the regulatory act of the Bank of Russia for the purpose of implementing the functions stipulated by Article 13 of the Law.

The criteria of a significant deviation of the price of, demand for, supply of, or trading volume of a financial instrument from the level of the price of, demand for, supply of, or trading volume of such financial instrument which would have been observed if no actions described in sub-clauses 2.1–2.8 of this Booklet had been carried out shall be defined by a relevant trade organizer depending on the type, liquidity and/or market value of the relevant financial instrument and in line with the guidelines of the Bank of Russia.

**(3) Upon the Company's request, notify the Company of transactions carried out** with financial instruments, namely:

(3.1.) Submit to the Company's Responsible Subdivision<sup>5</sup> a reply with the requested information (hereinafter referred to as the "reply to the request") within the timelines specified in the request which shall be not less than 10 business days from the date of receipt of the request by the relevant insider.

(3.2.) In the event the request is related to information about the transactions (contracts) specified in Parts 1 and 3 of Article 10 of the Law, but the insider did not carry out (conclude) them within the period indicated in the request, the insider shall submit information on the absence of such transactions (contracts) in the reply to the request.

(3.3.) At the discretion of the insider, the reply to the request may require the Responsible Subdivision to provide a confirmation of its receipt.

(3.4.) Should there exist any circumstances preventing the insider from replying to the request within the timelines specified therein, the insider shall at its own discretion submit a substantiated request for the extension of such timelines to the Responsible Subdivision, doing so within not less than 5 business days before the expiry of the timelines specified in the corresponding request for information.

The Responsible Subdivision shall review the request for the extension of the reply timelines within 2 business days from the day following the date of receipt of such request for extension.

If the Responsible Subdivision considers the request for the extension of the reply timelines to be substantiated, the Responsible Subdivision shall provide the insider with a notice of extension of information submission timelines (hereinafter referred to as the "notice of extension"); such extension, however, shall not exceed 5 business days from the date on which the insider receives the notice of extension.

If the Responsible Subdivision considers the request for the extension of the reply timelines to be unsubstantiated, the Responsible Subdivision shall provide the insider with a notice of its refusal to grant extension of information submission timelines (hereinafter referred to as the "notice of refusal").

(3.5.) Except for the case described in sub-clause 3.6 hereof, the reply to the request received from the Responsible Subdivision shall be submitted by the insider in the form of an electronic document by one of the below methods to be determined at the discretion of the insider:

- via hardware and software tools and the Internet;
- on an electronic data storage device (a CD, a flash memory device) by hand delivery or by registered mail with the acknowledgement of receipt requested;

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<sup>5</sup> Pursuant to Order of OJSC Gazprom No. 305 "On approval of access procedure for insider information of OJSC Gazprom and its confidentiality protection rules" dated November 2, 2012, the Company's Responsible Subdivision in charge of the control over the compliance with the laws on countering the illegal use of insider information and market manipulation is the Department of the Company (Elena Mikhailova).

- 4 - for the insiders specified in Clauses 7 and 13 of Article 4 of the Law<sup>6</sup> – via the information systems and hardware and software systems of the Company that are used for the corporate exchange of information, including electronic mail.
- (3.6.) Should there exist any circumstances preventing the insider from submitting the reply to the request as an electronic document by one of the methods specified in sub-clause 3.5 of this Booklet, the insider shall submit to the Responsible Subdivision the reply to the request as a hard-copy document either by hand delivery or by registered mail with the acknowledgement of receipt requested (one of these two delivery methods in this case shall be chosen by the insider at its own discretion).
- (3.7.) If the insider submits the reply to the request by a method specified in Paragraph 3 of sub-clause 3.5 of this Booklet, the reply to the request shall be in the form of a .dbf, .xls, .xlsx, .txt, or .csv file (to be determined at the discretion of the insider).
- (3.8.) If the insider submits the reply to the request on an electronic data storage device (a CD, a flash memory device), the insider shall submit it together with a hard-copy accompanying letter.
- (3.9.) If the reply to the request requires the Responsible Subdivision to provide a confirmation of its receipt, the Responsible Subdivision shall submit to the insider the confirmation of the receipt of the reply to the request, doing so within not more than 2 business days from the date on which the corresponding reply to the request was received.
- (3.10.) If the insider submits the request for the extension of the reply timelines, it shall be submitted in such a way as to make it possible for the addressee to confirm its receipt.
- (3.11.) Any reply to the request and/or a request for the extension of the reply timelines made in the form of electronic documents shall be signed by an electronic signature of the insider or its authorized representative (except for the cases when such documents are submitted by the method provided for by Paragraph 4 of sub-clause 3.5 of this Booklet) and contain data which make it possible to identify the insider.
- Any reply to the request, request for the extension of the reply timelines, and/or accompanying letter made by the insider in hard copy shall be signed by the insider or its authorized representative and contain data which make it possible to identify the insider.
- (3.12.) If any reply to the request, request for the extension of the reply timelines, accompanying letter, notice of extension and/or notice of refusal made in hard copy includes more than one sheet, it shall be paginated and bound, and the back of its last page shall bear an endorsement sticker indicating the number of pages bound in figures and words, the name, patronymic (if any) and surname of the person who filled in and attached the endorsement sticker with the signature of such person affixed on the sticker, and the date on which the endorsement sticker was filled in and attached.
- (3.13.) If the reply to the request, accompanying letter, and/or request for the extension of the reply timelines is signed by the insider's authorized representative, the insider shall, at the request of the Responsible Subdivision to provide a document confirming the authority of the insider's authorized representative, provide a document confirming the authority of such person within 3 business days from the date of receipt such request, by using a method that makes it possible to confirm the receipt of the document by the Responsible Subdivision.
- (4) Comply with the Terms and conditions of transactions** with financial instruments by individuals and entities included in the Company's insiders list and by their affiliated persons which are in force as approved by Resolution of the Gazprom Board of Directors No. 3452 dated June 11, 2020<sup>7</sup> (said document applies to the following categories of the Company's insiders: the Chairman and Members of the Company's Board of Directors; the Chairman and Members of the Company's Management Committee; Members of the Company's Audit Commission; individuals who have access to the Company's insider information on the basis of labor and/or civil

<sup>6</sup> Chairman and Members of the Company's Board of Directors; the Chairman and Members of the Company's Management Committee; Members of the Company's Audit Commission; individuals who have access to insider information on the basis of labor and/or civil contracts signed with the Company.

<sup>7</sup> Published on the Company's official Internet website (section *Investors*, subsection *Information disclosure / Information for insiders / Terms and conditions of transactions with financial instruments by individuals and entities included in Gazprom's insiders list and by their affiliated persons*).

5 contracts signed with the Company).

**Sanctions applicable to the insider:** administrative, civil law, disciplinary, and criminal.

**Administrative sanctions** for the illegal use of insider information and/or market manipulation, as per Articles 15.21, 15.30, 15.35 of the Code of Administrative Offences of the Russian Federation.

**Civil law sanctions** in the form of compensation of any losses inflicted as a result of the illegal use of insider information and/or market manipulation, as per Clause 7 of Article 7 of the Law.

**Disciplinary sanctions** in the form of a disciplinary penalty to be imposed for employee's non-execution or improper execution, through his/her own fault, of his/her professional duties, as per Article 192 of the Labor Code of the Russian Federation.

**Criminal sanctions** for market manipulation, as per Article 185.3 of the Criminal Code of the Russian Federation, and for the illegal use of insider information, as per Article 185.6 of the Criminal Code of the Russian Federation.