

LIST OF INSIDER INFORMATION OF PJSC GAZPROM

Insider information of PJSC Gazprom (hereinafter referred to as the “Company”) means the information about:

1) convocation and holding of the Company’s General Shareholders Meeting, statement that the Company’s General Shareholders Meeting is inquorate, as well as decisions adopted by the Company’s General Shareholders Meeting;

2) holding of the Company’s Board of Directors meeting and its agenda, as well as certain decisions adopted by the Company’s Board of Directors:

- on making a proposal to the Company’s General Shareholders Meeting that a certain date be set for determining the parties entitled to receive dividends as part of the decision (announcement) on dividend payout;

- on placing or selling the Company’s securities;

- on setting or outlining the procedure for setting the offer price of the Company’s shares or securities convertible into the Company’s shares;

- on creating an executive body of the Company and on early termination (suspension) of the powers of such body, including the powers of a managing company or a manager;

- on including nominees into the list of nominees to the Company’s Board of Directors to be voted on at the Company’s General Shareholders Meeting;

- on recommendations regarding the amount of dividends to be paid out on the Company’s shares and the payout procedure;

- on approving the Company’s internal documents;

- on authorizing or granting subsequent approval to a transaction (several interrelated transactions) conducted by the Company and considered under Russian law to be a major transaction and/or a related-party transaction, as well as a transaction (several interrelated transactions) the value of which constitutes 10 or more per cent of the value of assets which is determined on the basis of the Company’s consolidated financial statements (financial statements) as of the last reporting date (the end date of the last completed reporting period preceding the date on which the decision to authorize the transaction was adopted or the date on which the transaction was made if the decision on its subsequent approval is adopted);

- on delegating the powers of the Company’s sole executive body to a managing company or a manager, as well as approving a managing company or a manager and the terms and conditions of the contract signed by the Company with said managing company or manager;

- on approving a registrar to maintain the register of the holders of the Company’s securities, the terms and conditions of the contract with the registrar regarding the maintenance of the register of the holders of the Company’s securities, as well as the termination of said contract;

3) decision on the restructuring or dissolution of the party that provided collateral for the bonds issued by the Company;

4) conformity of the Company, or the party that provided collateral for the bonds issued by the Company, with the bankruptcy criteria outlined in Federal Law No. 127-FZ dated October 26, 2002, on Insolvency (Bankruptcy);

5) acceptance by an arbitration court of a petition on the insolvency (bankruptcy) of the Company, as well as the decision by an arbitration court to declare the Company insolvent (bankrupt), initiate a bankruptcy procedure against the Company, or terminate bankruptcy proceedings against the Company;

6) date on which the list of persons entitled to exercise the rights attached to the Company's securities is determined (established);

7) stages of the Company's securities issuance procedure;

8) suspension and resumption of the Company's securities issuance;

9) decision to declare a bond program failed, as well as to declare an issue (additional issue) of the Company's securities failed or invalid;

10) redemption of the Company's securities;

11) registration of amendments to the decision on issuing securities with regard to changing the scope of rights attached to securities and/or the nominal value of securities, including during the consolidation or splitting thereof;

12) decision on the acquisition (occurrence of reasons for the acquisition) by the Company of the securities placed by the Company;

13) proceeds accrued (declared) and/or paid out on the Company's securities, other amounts payable to the holders of the Company's securities, as well as the intention to fulfill the obligation to make payments on the Company's bonds the rights to which are accounted for in the register of the holders of the Company's securities;

14) inclusion of the Company's securities by a Russian trade organizer into the list of securities admitted to organized trading for the purposes of signing sales and purchase agreements, inter alia, inclusion of the Company's securities by a Russian securities exchange into the quotation list, or exclusion of the Company's securities by a Russian trade organizer from the list of securities admitted to organized trading for the purposes of signing sales and purchase agreements, inter alia, exclusion of the Company's securities by a Russian securities exchange from the quotation list, as well as the transfer of the Company's securities from a quotation list to another quotation list (exclusion of the Company's securities from a quotation list and inclusion thereof into another quotation list);

15) inclusion of the Company's securities (a foreign company's securities confirming the rights to the Company's securities (hereinafter referred to as the "depository securities")) into the list of securities admitted to trading in a foreign organized (regulated) financial market, inter alia, inclusion of said securities by a foreign securities exchange into a quotation list and exclusion of the Company's securities (depository securities) from the list of securities admitted to trading in a foreign organized (regulated) financial market, inter alia, exclusion of said securities by a foreign securities exchange from the quotation list;

16) failure by the Company to meet its obligations towards holders of its securities, as well as any change in the total number of the bonds the obligations on the early redemption of which were not fulfilled;

17) acquisition by a party or termination of a party's right to dispose of, directly or indirectly (through the parties under its control), individually or jointly with other parties under a trust management contract and/or a simple partnership contract and/or a commission contract and/or a shareholders agreement and/or any other agreement the subject matter of which is the exercise of rights represented by the Company's shares (stakes), a certain number of votes attached to voting shares (stakes) constituting the equity capital of the Company if such number of votes is 5 per cent or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 per cent of the total number of votes attached to voting shares (stakes) constituting the equity capital of the Company;

18) voluntary offer, including competitive or binding ones, submitted to the Company in compliance with Chapter XI.1 of Federal Law No. 208-FZ dated December 26, 1995, on Joint Stock Companies (hereinafter referred to as the "Federal Law on Joint Stock Companies"), to purchase its securities, as well as amendments to such offers;

19) notice, submitted to the Company in compliance with Chapter XI.1 of the Federal Law on Joint Stock Companies, regarding the right to request the redemption of the Company's securities or a request to redeem the Company's securities;

20) errors detected in the previously disclosed reporting (accounting (financial) statements, consolidated financial statements, financial statements) of the Company;

21) execution by the Company, or by an entity controlled by and having material importance for the Company as defined in Clause 1.14 of the Bank of Russia Regulation

No. 714-P dated March 27, 2020, on Information Disclosure by Issuers of Issue-Grade Securities registered by the Ministry of Justice of the Russian Federation under No. 58203 dated April 24, 2020 (hereinafter referred to as the “Bank of Russia Regulation No. 714-P”) (hereinafter referred to as the “entity controlled by and having material importance for the Company”), of a transaction the value of which constitutes 10 or more per cent of the value of assets which is determined on the basis of the Company’s consolidated financial statements as of the last reporting date (the end date of the last completed reporting period preceding the date on which the transaction was made);

22) execution by the Company, or by an entity controlled by and having material importance for the Company, of a related-party transaction conforming with the criteria outlined in Clause 35.1 of the Bank of Russia Regulation No. 714-P;

23) changes in the composition and/or amount of collateral for the Company’s collateralized bonds, or in case of a change in the composition and/or amount of collateral for the Company’s mortgage-backed bonds, details of such changes if they result from a replacement of any collateralized claim constituting mortgage collateral in relation to the bonds or a replacement of other property constituting mortgage collateral in relation to the bonds valued (with monetary value) at 10 or more per cent of the mortgage collateral securing the bonds;

24) acquisition by the Company or termination of the Company’s right to dispose of, directly or indirectly (through the parties under its control), individually or jointly with other parties under a trust management contract and/or a simple partnership contract and/or a commission contract and/or a shareholders agreement and/or any other agreement the subject matter of which is the exercise of rights represented by shares (stakes) of an entity whose securities are admitted to organized trading, a certain number of votes attached to voting shares (stakes) constituting the equity capital of said entity if such number of votes is 5 per cent or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 per cent of the total number of votes attached to voting shares (stakes) constituting the equity capital of such entity;

25) signing by a party controlling the Company, or an entity controlled by the Company, of a contract imposing an obligation to acquire the Company’s securities;

26) establishment and/or termination of the right of holders of the Company’s bonds to demand an early redemption of the Company’s bonds owned by them;

27) assignment of a rating to the securities and/or the Company as their issuer, as well as change of rating by a credit rating agency or another entity on the basis of a contract signed with the Company;

28) initiation of court proceedings on a dispute connected with incorporating, managing or participating in the Company (hereinafter referred to as the “corporate dispute”) or another dispute in which the Company is the plaintiff or the defendant and the amount claimed in which constitutes 10 or more per cent of the book value of the assets as per the accounting (financial) statements of the Company as of the last reporting date (the end date of the last completed reporting period preceding the date of acceptance by the court of the petition for court proceedings) (hereinafter referred to as the “material dispute”), as well as the adoption of a court ruling following the consideration of the merits of the case in the corporate dispute or in the material dispute, except for the information outlined in Clause 41.6 of the Bank of Russia Regulation No. 714-P;

29) placement, outside of the Russian Federation, of bonds or other financial instruments certifying the loan obligations being performed at the cost of the Company;

30) decision made by the Bank of Russia to exempt the Company from the obligation to disclose information in accordance with Article 30 of Federal Law No. 39-FZ dated April 22, 1996, on the Securities Market (hereinafter referred to as the “Federal Law on the Securities Market”);

31) acquisition (disposal) of the Company’s voting shares, or depositary securities confirming the rights to the Company’s voting shares, by the Company or an entity controlled by the Company, except for the cases in which the Company’s voting shares (depositary securities confirming the rights to the Company’s voting shares) are acquired in the course

of placing the Company's voting shares or acquiring (disposing of) the Company's voting shares (depository securities confirming the rights to the Company's voting shares) by a broker and/or trustee acting on their own behalf but at the expense of a client to fulfill the latter's order;

32) convocation and agenda of the general meeting of holders of the Company's bonds, decisions adopted by the general meeting of holders of the Company's bonds, as well as declaring the general meeting of holders of the Company's bonds inquorate;

33) selection of a representative of bond holders by the Company owning the bonds after the registration of the bond issue;

34) date on which the representative of bond holders begins exercising powers;

35) signing by the Company of a novation agreement or an accord and satisfaction agreement exempting the parties from their obligations on the Company's bonds;

36) occurrence of the right of the holders of the Company's convertible securities to demand that the Company perform a conversion of the Company's convertible securities owned by such holders;

36.1) project(s) selected by the Company, which is/are (will be) financed and/or refinanced by the monetary funds obtained from the placement of bonds the issue (program) of which is additionally identified with the use of the words "green bonds", "social impact bonds", "sustainability bonds", "transition bonds" (hereinafter referred to as the "green bonds", "social impact bonds", "sustainability bonds", "transition bonds", respectively), if such project(s) is/are not indicated in the decision on issuing green bonds, social impact bonds, sustainability bonds, transition bonds;

36.2) occurrence and results of an independent external assessment of the issue (program) of green bonds, social impact bonds, sustainability bonds, the bonds the issue (program) of which is additionally identified with the use of the words "sustainable development goals-linked bonds" (hereinafter referred to as the "SDG-linked bonds"), transition bonds, or the Company's policy adopted for the use of the monetary funds obtained from the placement of such bonds, or the project(s) which will be financed (refinanced) by the monetary funds obtained from the placement of such bonds, where such independent external assessment is performed to determine the conformity of the above to the principles and standards of the financial instruments specified in the decision on issuing such bonds;

36.3) occurrence and results of an independent external assessment of changes introduced into the Company's policy for the use of the monetary funds obtained from the placement of green bonds, social impact bonds, sustainability bonds, transition bonds;

36.4) occurrence and results of an independent external assessment of changes introduced into the climate transition strategy (if such changes concern the Company's target performance indicators, the interim and target values of those indicators and/or the internationally recognized climate change scenario that serves as the basis for developing the Company's climate transition strategy, as well as if such changes influence the ability to achieve the interim and target values of the Company's target performance indicators by means of the implementation of the Company's climate transition strategy) of the Company as the issuer of bonds the issue (program) of which is additionally identified with the use of the words "climate transition bonds" (hereinafter referred to as the "climate transition bonds");

36.5) misuse of the monetary funds obtained from the placement of green bonds, the bonds the issue (program) of which is additionally identified with the use of the words "infrastructure bonds", social impact bonds, sustainability bonds, transition bonds, as well as the occurrence of the consequences of misuse of said monetary funds that are stipulated in the decision on issuing the bonds;

36.6) violation of the principles and standards of the financial instruments specified in the decision on issuing the bonds that takes place during the implementation of project(s) the financing and/or refinancing of which involves the use of the monetary funds obtained from the placement of green bonds, social impact bonds, sustainability bonds, transition bonds;

36.7) inclusion of green bonds, social impact bonds, sustainability bonds, transition bonds into the list of sustainable development financial instruments which is published on

the dedicated Internet page of the methodological center of the State Development Corporation "VEB.RF" or into the list of sustainable development financial instruments which is maintained by the International Capital Market Association (ICMA) or by the Climate Bonds Initiative (CBI) international not-for-profit organization, as well as the removal of such bonds from said list;

36.8) achievement or a failure to achieve the interim values (if any) or the target value of the Company's key performance indicator(s) indicated in the decision on issuing SDG-linked bonds;

36.9) achievement or a failure to achieve the interim or target values of the target performance indicators of the Company as the issuer of climate transition bonds indicated in the Company's strategy for amending its activities with the purpose of low-carbon transition (energy transition), prevention of climate change and achievement of other goals established by the Paris Agreement dated December 12, 2015, which was adopted by Resolution of the Government of the Russian Federation No. 1228 dated September 21, 2019, on Adoption of the Paris Agreement (became effective for the Russian Federation on November 6, 2019);

37) information constituting the annual consolidated financial statements (financial statements) of the Company, interim consolidated financial statements (financial statements) of the Company for the reporting period of 6 months of the reporting year, as well as information contained in audit opinions prepared with respect to said statements or in another document drawn up on the basis of auditing the interim consolidated financial statements (financial statements) in accordance with auditing standards;

38) information contained in the annual reports of the Company, except for the information that was previously disclosed;

39) information constituting the interim accounting (financial) statements of the Company for the reporting period of 3, 6 or 9 months of the reporting year together with the information contained in audit opinions prepared with respect to said statements if such statements were audited, as well as information constituting the annual accounting (financial) statements of the Company together with the corresponding audit opinion if such statements were audited;

40) information contained in the reports of the issuer of issue-grade securities prepared for the reporting periods of 6 and 12 months, except for the information that was previously disclosed;

41) information contained in the prospectus of the Company's securities, except for the information that was previously disclosed;

42) information constituting the terms of securities placement outlined by the Company in a separate document, except for the information that was previously disclosed (if the prospectus of the securities is unavailable or does not contain the terms of securities placement);

43) signing by the Company of a strategic partnership contract or another contract (making of a transaction), except for contracts (transactions) envisaged by items 21, 22, and 27 hereof, if the conclusion of such contract (transaction) may have a significant impact on the price of the Company's securities admitted to organized trading (with respect to which an application for admission to organized trading was filed);

44) adoption by a court, an arbitration court, or the Federal Bailiffs Service of injunctive measures (including seizure) in respect of monetary funds or other property owned by the Company, or an entity controlling the Company, or an entity controlled by and having material importance for the Company, or a party that provided collateral for the bonds issued by the Company and admitted to organized trading (with respect to which an application for admission to organized trading was filed), other than the Russian Federation providing a government guarantee of the Russian Federation, or a constituent entity of the Russian Federation providing a government guarantee of the constituent entity of the Russian Federation, or a municipality providing a municipal guarantee, constituting 10 or more per cent of the book value of the assets owned by the above parties as of the end date of the last completed reporting period preceding the adoption of the injunctive measures;

45) acquisition by a party or termination of a party's right to dispose of, directly or indirectly (through the parties under its control), individually or jointly with other parties

under a trust management contract and/or a simple partnership contract and/or a commission contract and/or a shareholders agreement and/or any other agreement the subject matter of which is the exercise of rights represented by shares (stakes) of an entity that provided collateral, guarantee or pledge for the Company's bonds admitted to organized trading (with respect to which an application for admission to organized trading was filed) if the party that provided such collateral, guarantee or pledge for such bonds is other than the Russian Federation providing a government guarantee of the Russian Federation, or a constituent entity of the Russian Federation providing a government guarantee of the constituent entity of the Russian Federation, or a municipality providing a municipal guarantee, a certain number of votes attached to voting shares (stakes) constituting the equity capital of said entity if such number of votes is 5 per cent or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 per cent of the total number of votes attached to voting shares (stakes) constituting the equity capital of said entity;

46) circumstances set out in paragraph 2 of sub-clause 23, Clause 1, Article 2 of the Federal Law on the Securities Market which, depending on whether such circumstances occur or fail to occur, necessitate or preclude the payments under the Company's structured bonds admitted to organized trading (with respect to which an application for admission to organized trading was filed) (including payments related to redemption of structured bonds) (hereinafter referred to as the "circumstances"), with indication of the numerical values (parameters, conditions) of the circumstances or the procedure for determining the same, as well as information about the amount of payments per structured bond (including the amount of payments related to redemption of a structured bond) or the procedure for determining the same, except for the information that was previously disclosed;

47) numerical values (parameters, conditions) of the circumstances or the procedure for determining the same, as well as information about the amount of payments per structured bond (including the amount of payments related to redemption of a structured bond) or the procedure for determining the same, if these are established by an authorized body of the Company prior to the placement of structured bonds in accordance with sub-clauses 1 and 2, Clause 3, Article 27.1-1 of the Federal Law on the Securities Market, except for the information that was previously disclosed (if such information is not contained in the decision on the issuance of structured bonds);

48) initiation of criminal proceedings (as officially communicated to the Company by the preliminary investigation or inquiry authorities) against a member of the executive management team of the Company, an entity controlling the Company, an entity controlled by and having material importance for the Company, or a party that provided collateral for the bonds issued by the Company and admitted to organized trading (with respect to which an application for admission to organized trading was filed);

49) information contained in the materials on the basis of which the Company's management bodies, except for the General Shareholders Meeting, make decisions that may have a significant impact on the price of the Company's securities admitted to organized trading (with respect to which an application for admission to organized trading was filed), except for the information that was previously disclosed;

49.1) emergency that takes place at hazardous facilities operated by the Company, as are defined by Federal Law No. 116-FZ dated July 21, 1997, on Industrial Safety at Hazardous Facilities, if such information may have a significant impact on the price of the Company's securities admitted to organized trading (with respect to which an application for admission to organized trading was filed);

50) any other events (actions) that, in the Company's opinion, have a significant impact on the price or quotations of its securities.