

ETHICS AND ANTI-CORRUPTION ACTIVITIES

REGULATORY FRAMEWORK FOR THE COMPANY'S ANTI-CORRUPTION ACTIVITIES:

- **Legislation of the Russian Federation**
- **Code of Corporate Governance of Gazprom Neft**
- **Anti-Fraud and Anti-Corruption Policy**

The Company has zero tolerance for possible risks of corruption and fraud. The Company's primary regulatory document in this regard – the Anti-Corruption and Anti-Fraud Policy – includes the main requirements for implementing business processes in order to mitigate corruption risks and also prescribes anti-corruption rules and standards for all the Company's employees.

The Company's Deputy CEO for Security is responsible for anti-fraud and anti-corruption matters.

Gazprom Neft has developed an anti-corruption compliance system that includes a number of anti-corruption measures at all levels of internal corporate regulation:

- analysing and updating of one of the key corporate risks – the risk of fraud and corruption
- employing the principle of due diligence when selecting counterparties and the inclusion of the relevant obligations of the parties (anti-corruption reservations) in the contracts to be concluded

- checking of existing and hired employees for their affiliation to third-party commercial structures and whether there might be a conflict of interest
- a hotline to counter fraud, corruption, and other violations of the Corporate Code, which allows for the anonymous reporting of violations within the Corporate Centre and at subsidiaries
- conducting official investigations into any violations that are identified and holding the guilty parties responsible

The Company has developed the 'Combating Fraud and Corruption' online course, which each current and newly hired Gazprom Neft employee must take.

The Company's Deputy CEO for Security is responsible for anti-fraud and anti-corruption matters.