

APPROVED
by Order
of Transneft
No. 402 dated December 14, 2020

List of Insider Information of Transneft

1. Insider information of Transneft (hereinafter – the “Issuer”) includes the following information:

1.1. On convocation and holding of the General Meeting of Shareholders of the Issuer, including the information about agenda, date of holding, date of drawing up the list of persons entitled to participate in the General Meeting, as well as on the decisions adopted by the General Meeting of Shareholders of the Issuer.

1.2. On agenda of the meeting of the Board of Directors of the Issuer, as well as on the decisions adopted thereby.

1.3. On the facts of non-adoption by the Board of Directors of the Issuer of the following decisions, which shall be adopted according to the Federal Laws:

1.3.1. On convocation of the annual (ordinary) General Meeting of Shareholders of the Issuer, as well as on other decisions, related to preparation, convocation and holding of the annual (ordinary) General Meeting of Shareholders of the Issuer;

1.3.2. On convocation (holding) of, or on refusal to convene (hold) the extraordinary General Meeting of Shareholders of the Issuer at request of the Revision Commission (Inspector) of the Issuer, Auditor of the Issuer or the Shareholders (Shareholder), who own at least 10 percent of the voting shares of the Issuer;

1.3.3. On inclusion or on refusal to include the proposed issues to the agenda of the General Meeting of Shareholders of the Issuer, and the nominated candidates to the list of the candidates for voting on the election to the respective body of the Issuer, proposed by the Shareholders (Shareholder) who jointly own at least 2 percent of the voting shares of the Issuer;

1.3.4. On formation of the Sole Executive Body of the Issuer on two meetings of the Board of Directors of the Issuer held in sequence, or within two months from the date of termination or expiration of the powers of the previously formed Sole Executive Body of the Issuer in case provided for by Clause 6 of Article 69 of Federal Law No.

208-FZ dated December 26, 1995, On Joint-Stock Companies;

- 1.3.5. On early termination of powers of the Sole Executive Body of the Issuer on two meetings of the Board of Directors of the Issuer held in sequence, in case provided for by Clause 7 of Article 69 of Federal Law, On Joint-Stock Companies;
- 1.3.6. On convocation (holding) of the extraordinary General Meeting of Shareholders of the Issuer in case the number of the members of the Board of Directors of the Issuer becomes less than the number, which makes the quorum for holding of the meeting of the Board of Directors of the Issuer;
- 1.3.7. On formation of the temporary Sole Executive Body of the Issuer and on holding of the extraordinary General Meeting of Shareholders of the Issuer for solving of the issue on early termination of powers of its Sole Executive Body or the managing company (chief manager) and on formation of the new Sole Executive Body of the Issuer, or on delegation of powers of its Sole Executive Body to the managing company (chief manager) in case the Board of Directors of the Issuer adopts the decision about suspension of powers of its Sole Executive Body or powers of the managing company (chief manager);
- 1.3.8. On recommendations in respect of the voluntary, including competitive, or mandatory offer received by the Issuer and including evaluation of the proposed price for the equity securities being acquired and possible amendments of their market price after the acquisition, evaluation of the plans of the entity who sent the voluntary, including competitive, or mandatory offer, in respect of the Issuer, including its employees.

1.4. On sending of the application by the Issuer about entering into the Unified State Register of Legal Entities of entries related to reorganization, termination or liquidation of the Issuer, and, in case of adoption by the state authority for the state registration of legal entities of the decision on refusal to enter the specified records – the information about adoption of such decision.

1.5. On occurrence of the Issuer's controlled¹ organization having significant importance for it, as well as on termination of the grounds for control²

¹ A controlled entity (controlled organization) is a legal entity being directly or indirectly controlled by the controller.

² A controlling entity (controlling organization) is an entity entitled to directly or indirectly (through its controlled entities) dispose of more than 50 percent of the votes in the Supreme Governing Body of the entity controlled by the Issuer by virtue of interest in the entity controlled by the Issuer and / or on the basis of the contracts of trust management of property, and / or the partnership agreement, and / or the order, and / or the shareholder's agreement, and / or other agreement the subject of which is exercise of the rights certified by shares of (interest in) the entity controlled by the Issuer, or to appoint (elect) the Sole Executive Body and / or over 50 percent of the membership of the Governance Board of the entity controlled by the Issuer.

over such an organization.

1.6. On occurrence of the person controlling the Issuer, as well as on termination of the grounds for such control.

1.7. On adoption of the decision on reorganization or liquidation by the organization controlling Issuer, organization controlled by the Issuer having significant importance for it, or by the entity that provided securities under bonds of the Issuer.

1.8. On sending by the organization, controlling the Issuer, or the organization controlled by the Issuer, having significant importance for it, or by the entity that provided securities under bonds of the Issuer, of the application about entering into the Unified State Register of Legal Entities of entries related to reorganization, termination or liquidation of the organizations specified.

1.9. On occurrence of the signs of insolvency (bankruptcy) provided for by the laws of the Russian Federation on insolvency (bankruptcy) at the Issuer's controlling entity, of the organization controlled by the Issuer, having significant importance for it, or at the entity which provided security for bonds of the Issuer.

1.10. On acceptance by the Arbitration Court of the application for recognition of the Issuer, its controlling entity, organization controlled by the Issuer, having significant importance for it, or the entity which provided with security for bonds of the Issuer as bankrupts, as well as on taking by the Arbitration Court of the decision on recognition of the entities specified as bankrupts, introduction of one of the bankruptcy procedures in respect of them, termination of the bankruptcy proceeding in respect of them.

1.11. On filing of a claim the amount of which is 10 or more percent of the book value of assets of entities specified as of the end date of the last completed reporting period preceding the claim filing with the Issuer, the organization controlling it, the organization controlled by the Issuer, having significant importance for it, or the entity which provided security under bonds of the Issuer, or other claim, the satisfaction of which, in the opinion of the Issuer, may materially influence the financial and economic state of the Issuer and the entities specified.

1.12. On the date as of which the entities entitled to exercising of the rights under the equity securities of the Issuer are defined, as well as on the date as of which the list of the entities entitled to participate in the General Meeting of Shareholders of the Issuer is drawn up.

1.13. On adoption of the following decisions by the authority bodies of the Issuer:

1.13.1. on placement of the equity securities of the Issuer;

- 1.13.2. on the starting date of placement of the equity securities of the Issuer;
- 1.13.3. on suspension of placement of the equity securities of the Issuer;
- 1.13.4. on refusal to place the equity securities of the issue (additional issue) of the Issuer.
- 1.14. On completing of placement of the equity securities of the Issuer.
- 1.15. On sending (filing) by the Issuer of the application for the state registration of the issue (additional issue) of the equity securities, registration of the prospectus for securities, the state registration of the bond program, the state registration of the amendments made to the decision on the issue (additional issue) of the equity securities and / or to their prospectus, the state registration of the amendments made to the bond program, to the conditions of the issue (additional issue) of bonds and / or into their prospectus under the bond program, the state registration of the report on the results of the issue (additional issue) of the equity securities.
- 1.16. On sending (filing) by the Issuer of the notice of the results of the issue (additional issue) of the equity securities.
- 1.17. On decision of the Arbitration Court on recognition of the issue (additional issue) of the equity securities of the Issuer as invalid.
- 1.18. On redemption of the equity securities of the Issuer.
- 1.19. On the accrued and / or paid out income under the equity securities of the Issuer.
- 1.20. On conclusion by the Issuer of the contract with the Russian market operator for inclusion of the equity securities of the Issuer into the list of the securities eligible for organized trades on the Russian Trade Organization, as well as the contract with the Russian exchange on inclusion of the equity securities of the Issuer into the quotation list of the Russian Federation exchange.
- 1.21. On conclusion by the Issuer of the contract for inclusion of the equity securities of the Issuer, or securities of the foreign issuer, certifying the rights in respect of the equity securities of the Russian Issuer, into the list of the securities eligible for trades on the foreign organized (regulated) financial market, as well as of the contract with a foreign exchange for inclusion of such securities into the quotation list of the foreign exchange.
- 1.22. On inclusion of the equity securities of the Issuer, or securities of the foreign issuer, certifying the rights in respect of the equity securities of the Russian Issuer, into the list of the securities eligible for trades on the foreign organized (regulated) financial market, and on exclusion of such securities from the list

specified, as well as on inclusion of such securities into the quotation list of the foreign exchange or on their exclusion from the list specified.

1.23. On conclusion by the Issuer of the contract for support (stabilization) of the prices for the equity securities of the Issuer (securities of the foreign Issuer, certifying the rights in respect of the equity securities of the Russian Issuer), on the terms and conditions of the contract specified, as well as on termination of such a contract.

1.24. On filing by the Issuer of the application for obtaining of the Bank of Russia's authorization for placement and / or organization of trading of its equity securities beyond the Russian Federation.

1.25. On the Issuer's failure to fulfil its obligations to the owners of its equity securities.

1.26. On acquisition by an entity or termination of the entity's right to, directly or indirectly (through its controlled entities) independently or jointly with other entities related thereto under a contract of trust management of property, and / or a partnership agreement, and / or an order, and / or a shareholder's agreement, and / or other agreement the subject of which is the exercise of the rights certified by shares of the Issuer, dispose of a certain number of votes attached to the voting shares comprising the authorized capital of the Issuer, if the specified number of votes is five percent, or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attached to the voting shares comprising the authorized capital of the Issuer.

1.27. On the voluntary, including competitive, or mandatory offer received by the Issuer in accordance with Chapter XI.1 of the Federal Law, On Joint-Stock Companies, concerning acquisition of its equity securities, as well as concerning the amendments made to the offers specified.

1.28. On the notice received by the Issuer for the right to claim for redemption of the equity securities of the Issuer or the claim for redemption of the equity securities of the Issuer in accordance with Chapter XI.1 of the Federal Law, On Joint-Stock Companies.

1.29. On detection of the errors in the accounting (financial) statements of the Issuer previously disclosed if such errors may produce material influence on the price of the equity securities of the Issuer.

1.30. On performance by the Issuer or the entity which provided security for bonds of the Issuer, of the transaction the amount of which is 10 or more percent of the book value of the Issuer's assets or the assets of the entity specified as of the end date of the last completed reporting period preceding the transaction performance.

1.31. On performance by the organization, controlling the Issuer, or the organization controlled by the Issuer, having significant importance for it, the transaction recognized as a major transaction in accordance with the legislation of the Russian Federation.

1.32. On performance by the Issuer of the interested party transaction, if the amount of such transaction is one percent or more than the book value of the Issuer's assets as of the end date of the last completed reporting period preceding adoption of the decision on the consent for the transaction performance by the authorized management body of the Issuer, and, if the decision on the consent for the transaction performance has not been adopted, – as of the end date of the last completed reporting period preceding performance by the Issuer of such a transaction.

1.33. On change of the content and / or amount of the subject of pledge under the Issuer's bonds with collateral security, and in case of change of the content and / or amount of the subject of pledge under the Issuer's bonds with mortgage collateral - information on such changes, if they are resulted from replacement of any claim mortgage-secured, comprising the mortgage collateral of bonds, or replacement of other property, comprising the mortgage collateral of bonds, the cost (monetary value) of which amounts to 10 or more percent of the mortgage collateral of bonds.

1.34. On changes of the value of assets of the entity which provided security for bonds of the Issuer, which amounts to 10 or more percent, or on other material, in the opinion of the Issuer, change of the financial and economic state of such an entity.

1.35. On obtaining by the Issuer or termination of the Issuer's right to, directly or indirectly (through its controlled entities), independently or jointly with other entities related thereto under a contract of trust management of property, and / or a partnership agreement, and / or an order, and / or a shareholder's agreement, and / or other agreement the subject of which is the exercise of the rights certified by shares (interest in) of the organization the equity securities of which are eligible for the organized trades, or the value of the assets of which exceeds five billion rubles, dispose of a certain number of votes attached to the voting shares (interest in) comprising the authorized capital of the specified organization, if the specified number of votes is five percent, or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attached to the voting shares (interest in) comprising the authorized capital of such an organization.

1.36. On acquisition by an entity or termination of the entity's right to, directly or indirectly (through its controlled entities), independently or jointly with other entities, related thereto under a contract of trust management of property, and / or a partnership, and / or an order, and / or a shareholder's agreement, and / or other agreement the subject of which is exercise of the rights certified by the shares

(interest in) of the organization, which provided the suretyship for bonds of the Issuer, dispose of a certain number of votes attached to the voting shares (interest in) comprising the authorized capital of such an organization, if the specified number of votes is five percent, or has become more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes attached to the voting shares (interest in) comprising the authorized capital of such an organization.

1.37. On conclusion by the Issuer, the organization controlling it, or the organization controlled by the Issuer, of the contract providing for an obligation to acquire the equity securities of the Issuer.

1.38. On obtaining, suspension, renewal, reissue, on revocation (cancellation) or on termination on other grounds of validity of the Issuer's authorize (license) for a certain activity having material financial and economic significance for the Issuer.

1.39. On expiration of powers of the Sole Executive Body and / or the members of the Collective Executive Body of the Issuer.

1.40. On change of the amount of the equity interest in the authorized (share) capital of the Issuer and the organizations controlled by the Issuer, having significant importance for it:

entities being the members of the Board of Directors, members of the Collective Executive Body of the Issuer, as well as the entities, holding the position (performing the functions) of the Sole Executive Body of the Issuer;

entities being the members of the Board of Directors, members of the Collective Executive Body of the managing organization, as well as the entities holding the position (performing the functions) of the Sole Executive Body of the managing organization, in case powers of the Sole Executive Body of the Issuer are delegated to the managing organization.

1.41. On occurrence and / or termination of the Issuer's bonds owners' right to claim for the Issuer to early redeem the Issuer's bonds they own.

1.42. On engagement or replacement of the organizations providing the Issuer with the services of the intermediary in fulfillment by the Issuer of the obligations under the bonds or other equity securities of the Issuer, specifying their names, location and amount of the fee for the services rendered, as well as on change of the information specified.

1.43. On the dispute related to the incorporation of the Issuer, its management or interest in it, if the resolution on the dispute specified may materially influence the price of the equity securities of the Issuer.

1.44. On setting the claims related to obligations fulfillment under such

bonds to the entity which provided security for bonds of the Issuer.

1.45. On placement of the bonds or other financial instruments certifying the loan liabilities fulfilled at the expense of the Issuer beyond the Russian Federation.

1.46. On acquisition (on alienation) of the voting shares of the Issuer or securities of a foreign issuer, certifying the rights in respect of voting shares of the Issuer, by the Issuer and / or by the organizations controlled by the Issuer, except for the controlled organizations being brokers and / or trust managers and executing the transaction on their behalf but at the expense of the customer, not being the Issuer and / or its controlled organization.

1.47. Information sent or submitted by the Issuer to the respective authority (respective organization) of a foreign country, foreign exchange and / or other organizations in accordance with foreign law for the purpose of its disclosure or submission to the foreign investors due to placement or trading of the equity securities of the Issuer beyond the Russian Federation, including by acquisition of the securities of the foreign issuer being placed (placed) in accordance with the foreign law, if such information may materially influence the price of the equity securities of the Issuer.

1.48. Information comprising the annual accounting (financial) statements and consolidated financial statements of the Issuer, as well as the information contained in the audit reports, prepared in respect of the specified statements.

1.49. Information comprising interim accounting (financial) statements and consolidated financial statements of the Issuer for the reporting period, consisting of three, six or nine months of the current year, as well as the information contained in the audit reports, prepared in respect of the specified statements.

1.50. Information comprising the terms and conditions of the equity securities placement, determined by the resolution approved by the competent authority of the Issuer on the issue (additional issue) of the securities, approved bond program, approved terms and conditions of the issue (additional issue) of bonds under the bond program, except for the information, previously disclosed in accordance with the requirements of the legislation of the Russian Federation on the securities market.

1.51. Information contained in the report (notice) approved by the competent authority of the Issuer concerning the results of the issue of the equity securities, except for the information, previously disclosed in accordance with the requirements of the legislation of the Russian Federation on the securities market.

1.52. Information contained in the prospectus for securities approved by the authorized body of the Issuer, except for information, previously disclosed in accordance with the requirements of the legislation of the Russian Federation on

the securities market.

1.53. Information contained in the quarterly reports signed by the authorized persons of the Issuer, except for information, previously disclosed in accordance with the requirements of the legislation of the Russian Federation on the securities market.

1.54. Information contained in the annual reports signed by the authorized persons of the Issuer, except for information, previously disclosed in accordance with the requirements of the legislation of the Russian Federation on the securities market.

1.55. On conclusion by the Issuer of the contract for strategic partnership or other contract not provided for by Subsections 1.20, 1.21, 1.23, 1.30, 1.32, 1.37 of this Clause, if conclusion of such contracts may materially influence the price of the equity securities of the Issuer.

1.56. On holding and the agenda (on refusal to hold) of the General Meeting of the Bonds Owners of the Issuer, as well as on the decisions adopted by the General Meeting of the Bonds Owners of the Issuer.

1.57. On sending (filing) by the Issuer of the notice containing the information on the representative of the bonds owners.

1.58. On taking by the court, the Arbitration Court, the executive authority carrying out the enforcement proceeding, injunctive measures in respect of the monetary funds or other property owned by the Issuer, the organization controlling it, organization controlled by the Issuer, having significant importance for it, or the entity which provided security for bonds of the Issuer, amounting to 10 or more percent of the book value of the assets of the entities specified as of the end date of the last completed reporting period, preceding taking the injunctive measures.

1.59. On initiation of proceeding of a criminal case (information received by the Issuer from the preliminary investigation bodies or inquiry bodies) in respect of a member of the Board of Directors of the Issuer, the Sole Executive Body of the Issuer, the organization controlling it, the organization controlled by the Issuer, having significant importance for it, or the entity which provided security for bonds of the Issuer.

Information specified in Clauses 1.1 - 1.59 shall refer to the insider information, the list of which is approved by the Bank of Russia's Ordinance No. 3379-U, dated 11 September 2014, "On the List of Insider Information of the Entities Mentioned in Clauses 1 - 4, 11 and 12 of Article 4 of the Federal Law "On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation".

1.60. Information contained in the Long-Term Development Programme

approved by the Board of Directors of the Issuer.

1.61. Information contained in the Sustainable Development Reports signed by the authorized persons of the Issuer, except for the information, previously disclosed in accordance with the requirements of the legislation of the Russian Federation on the securities market.

1.62. Information on mergers and acquisitions in which the Issuer is a participant, including, but not limited to: decisions of management bodies on the establishment of new companies, acquisition of a stake in other organizations, their reorganization, agreements of shareholders (participants), contracts, drafts of these documents.

1.63. Information contained in draft documents in accordance with Clauses 1.1 - 1.49, 1.55 - 1.57 of this List (draft material facts, decisions of the General Meetings of Shareholders, decisions of the Board of Directors (committees under the Board of Directors), contracts, financial statements, orders, statements, notifications, other draft documents containing insider information).

1.64. Draft reports of the Issuer (quarterly reports) of Transneft as an Issuer of equity securities.

1.65. Draft Annual Reports of Transneft.

1.66. Draft Sustainable Development Reports of Transneft.

1.67. Draft issue documents of Transneft (decision on issue (additional issue) of securities, prospectus for securities, bond program, terms of issue (additional issue) of bonds under the bond program, report (notice) on the results of issue (additional issue) of securities).

2. Information on the equity securities being placed by the Issuer, provided for by Subsections 1.13 - 1.16, 1.50, 1.51, 1.56 and 1.57 of Clause 1 of this List shall refer to the insider information of the Issuer, if:

- the equity securities of the Issuer are placed at the organized trades;
- the placed equity securities of the Issuer comprise the additional issue in respect of the equity securities of the issue eligible for organized trades or in respect of which an application for admission to organized trades is filed.

3. Information on the placed (traded) equity securities of the Issuer, provided for by Subsections 1.12, 1.18, 1.19, 1.23, 1.37, 1.41, 1.56 и 1.57 of Clause 1 of this List, shall refer to the insider information of the Issuer in case the specified equity securities are eligible for organized trades or an application for admission to organized trades is filed in respect of them.

4. Information on the entity which provided security for bonds of the Issuer, as well as on the terms and conditions of such security, provided for by Subsections 1.7 - 1.11, 1.30, 1.33, 1.34, 1.36, 1.44, 1.58, 1.59 of Clause 1 of this List, shall refer to the insider information of the Issuer in case the specified bonds are eligible for organized trades or an application for admission to organized trades is filed in respect of them.

Information on the entity which provided security for bonds of the Issuer, provided for by Subsections 1.7 - 1.11, 1.30, 1.34, 1.59 of Clause 1 of this List, shall not refer to the insider information of the Issuer in case such entity represents as the Russian Federation which provided the Russian Federation guarantee, a subject of the Russian Federation which provided the state guarantee of a subject of the Russian Federation, or a municipal entity which provided the municipal guarantee under the bonds of the Issuer.