

APPROVED
by Order No. 108
of Transneft
dated 26 March 2021

Transneft's in-house list of insider information

1. The following information is classified as the insider information of Transneft (hereinafter – the issuer):
 - 1.1. Information on convening and holding of the issuer's general shareholders' meeting, as well as on the decisions taken by this assembly.
 - 1.2. Information on holding of the Board of Directors' meeting and its agenda.
 - 1.3. Information on the issuer's Board of Directors making the following decisions:
 - 1.3.1. election (reelection) of the Chairman of the Board of Directors of the issuer or, in this person's absence, on a Board member performing the functions of the Chairman of the Board of Directors of the issuer;
 - 1.3.2. proposal to the issuer's general shareholders' meeting to specify a certain date in the dividend payout decision, on which people entitled to dividends are to be named;
 - 1.3.3. floating the issuer's securities at the stock exchange;
 - 1.3.4. fixing the offer price at trading sessions;
 - 1.3.5. repurchasing (buy-back) price for the issuer's shares;
 - 1.3.6. acquisition (buy-back) by the issuer of its own securities floated at the stock exchange;
 - 1.3.7. establishing the issuer's executive body and preterm suspension (revocation) of its powers, including the powers of a management company or a manager;
 - 1.3.8. recommended amount of dividends on the issuer's shares and the procedure of their payment;
 - 1.3.9. agreement with or subsequent approval of the deals recognised as major related-party transactions by the Russian Law or related party transactions;
 - 1.3.10. approval of the agenda for the issuer's general shareholders' meeting, as well as other decisions related to preparations for, convening and holding of the issuer's general shareholders' meeting;
 - 1.3.11. placing before the issuer's shareholders' meeting the issues (suggestion that the general shareholders' meeting should make decisions on certain issues) specified in Subclauses 2, 6 and 14-19 of Clause 1, Art. 48 of the Federal Law No.208-FZ dated 26 December 1995 on Joint-Stock Companies (hereinafter – the Federal Law on Joint-Stock Companies), as well as on delegating the powers of the sole executive body of such issuer to a management company or manager;
 - 1.3.12. recommendations relative to a voluntary (including a competitive) or mandatory offer stipulated by Chapter XI.1 of the Federal Law on Joint-Stock Companies;
 - 1.4. Information on the issuer's Board of Directors declining a decision:
 - 1.4.1. regarding the convocation of the issuer's (regular) general shareholders' meeting, as well as other decisions related to preparations for, convening and holding of the issuer's annual (regular) general shareholders' meeting;
 - 1.4.2. on convening (holding) or declining to convene (hold) of an extraordinary general shareholders' meeting of the issuer on demand of the issuer's revision commission, the issuer's auditor or shareholder(s) who own(s) at least 10 per cent of the issuer's voting shares;
 - 1.4.3. on inclusion or declining to include any issues proposed in the agenda of the issuer's general shareholders' meeting and candidates nominated – in the list of candidates to be voted for or against during the elections to a respective body of the said issuer, who were nominated by a shareholder (shareholders) owning at least two per cent of the issuer's voting shares;
 - 1.4.4. on establishment of the issuer's sole executive body at two meetings of the issuer's Board of Directors held in a row, or within two months since the date of termination or expiry of the term of powers of the issuer's earlier formed sole executive body in cases stipulated by Clause 6 of Art. 69 of the Federal Law on Joint-Stock Companies;

- 1.4.5. on preterm termination of powers of the issuer's sole executive body at two meetings of the issuer's Board of Directors held in a row in cases stipulated by Clause 7 of Art. 69 of the Federal Law on Joint-Stock Companies;
- 1.4.6. on convening (holding) of the issuer's extraordinary general shareholders' meeting, whenever the number of the Board members is less than needed for a full-fledged meeting of the issuer's Board of Directors to take place;
- 1.4.7. on forming an interim sole executive body of the issuer and on holding of the issuer's extraordinary general shareholders' meeting to address the preterm termination of powers of the issuer's sole executive body or management company (manager) and on forming a new sole executive body of the issuer or delegation of powers exercised by its sole executive body to a management company (manager), should the issuer's Board of Directors decide to suspend the powers of its sole executive body or the powers of a management company (manager);
- 1.4.8. on recommendations relative to a voluntary (including a competitive) or mandatory offer obtained by the issuer and stipulated by Chapter XI.1 of the Federal Law on Joint-Stock Companies that include the estimated offered price of acquired public securities and a possible change of their market value after acquisition, assessed plans of a person who has forwarded a voluntary (including a competitive) or mandatory offer relative to the issuer, including its employees.
- 1.5. Information on the issuer's new subsidiary (subordinate entity)¹ of significant importance to the issuer, and on cessation of grounds for control over this entity.
- 1.6. Information on a new entity having control over the issuer², as well as on cessation of grounds for such control.
- 1.7. Information on the corporate restructuring or dissolution decision relative to the issuer's controlling or subordinate entity having significant importance to the issuer, or on the decision made by a person who has provided collateral on the issuer's bonds admitted to public trading (relative to which an application has been submitted on their admission to being traded at the stock exchange).
- 1.8. Information on early signs of bankruptcy (insolvency) stipulated by the Russian law on the insolvency (bankruptcy) of the issuer, the issuer's controlling or subordinate entity having significant importance to the issuer, or of a person who has provided collateral on the issuer's bonds admitted to public trading (relative to which an application has been submitted on their admission to being traded at the stock exchange).
- 1.9. Information on a bankruptcy notice released by an arbitration court relative to the issuer, the issuer's controlling or subordinate entity having significant importance to the issuer, or relative to a person who has provided collateral on the issuer's bonds admitted to public trading (or those relative to which an application has been submitted on their admission to being traded at the stock exchange), as well as on a bankruptcy notice released by an arbitration court, or enforcement of one of bankruptcy proceedings against above-mentioned entities, or else cessation of bankruptcy proceedings against those entities.
- 1.10. Information on submittal of a claim against the issuer, its controlling entity, subordinate entity having a significant importance to the issuer, or against a person who has provided collateral on the issuer's bonds eligible for on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading) that accounts for 10 or more per cent of the book value of assets owned by said entities as of the end date of the last completed reporting period preceding the claim.
- 1.11. Information on the date on which persons entitled to exercising their rights on the issuer's securities admitted to public trading (relative to which an application has been submitted for

¹ A subordinate entity (subsidiary) is a legal entity under direct or indirect control by a controlling entity.

² A controlling entity (person) is an entity entitled to direct or indirect (via its subordinate entities) disposal of assets by virtue of shareholding in a subordinate entity and (or) on the basis of asset management agreements and (or) partnership agreement and (or) commercial mandate agreement and (or) shareholder agreement and (or) any other agreement whose subject is exercising the rights certified by shares or stakes in a subordinate entity, entitling to more than 50 per cent of votes in the supreme governance body of a subordinate entity (subsidiary) or entitling to the right to appoint (elect) a sole executive body and (or) more than 50 per cent of members in the managing board of a subordinate entity.

their admittance to on-exchange trading), including on the date on which a list of persons entitled to participate in the issuer's general shareholders' meeting is drafted.

- 1.12. Information on stages in the procedure of issuing the issuer's securities admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading).
- 1.13. Information on suspended and resumed issue of the issuer's securities admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading).
- 1.14. Information on overruling or invalidation of the issue (new issue) of the issuer's public securities admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading).
- 1.15. Information on redemption of the issuer's public securities admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading).
- 1.16. Information on the accrued and (or) paid yield on securities admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading).
- 1.17. Information on an agreement signed between the issuer and the Russian listing authority on inclusion of the issuer's public securities in the list of securities admitted by the Russian listing authority to on-exchange trading, as well as on an agreement with the Russian stock exchange on including the issuer's securities in the quotation list of the Russian exchange.
- 1.18. Information on inclusion of the issuer's public securities in the list of securities admitted to on-exchange trading by the Russian listing authority or on their exclusion from the said list, as well as on inclusion of the issuer's public securities in the quotation list of the Russian exchange or their exclusion from the said list.
- 1.19. Information on inclusion of the issuer's public securities or securities issued by a non-resident entity, certifying the rights relative to the Russian issuer's public securities, in the list of securities admitted to on-exchange trading in an organised (regulated) foreign stock market, as well as on inclusion in the quotation list of a foreign exchange or exclusion from the said list of such public securities.
- 1.20. Information on a price support (stabilisation) agreement by the issuer in relation to its public securities (non-resident entity's securities certifying its rights to the Russian issuer's public securities) admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading), as well as on cancellation of such an agreement.
- 1.21. Information on the issuer's submittal of an application to the Bank of Russia for the permission to float and (or) list the issuer's traded public securities beyond Russia, as well as on granting of the said permission.
- 1.22. Information on the issuer's default on its commitments to holders of its public securities admitted to on-exchange trading.
- 1.23. Information on acquisition by a person (entity) of the right or lapse of the right, directly or indirectly (via entities under its control), independently or together with other entities who have signed an asset management and (or) partnership and (or) commercial mandate (agency) and (or) any other agreement whose subject is exercising the rights certified by the issuer's shares, – to dispose of a certain number of votes granted by voting shares constituting the issuer's authorised capital if the number of votes is less than 5 per cent or becomes more or less than five, ten, fifteen, twenty, twenty-five, thirty, fifty, seventy-five or ninety-five per cent of total votes falling to the share of voting stock constituting the issuer's authorised capital.
- 1.24. Information on a voluntary (including a competitive) or mandatory offer to the issuer, as per Chapter XI.1 of the Federal Law on Joint-Stock Companies, to buy-back its public securities admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading), as well as on any changes in said offers.
- 1.25. Information on the issuer being notified, as per Chapter XI.1 of the Federal Law on Joint-Stock Companies, of its right to demand redemption of the issuer's public securities admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading) or the requirement to redeem (buy-back) the issuer's public securities

admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading).

- 1.26. Information on mistakes discovered in financial statements earlier disclosed or submitted by the issuer.
- 1.27. Information on the issuer or any entity that has provided collateral on the issuer's bonds admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading) striking a deal amounting to ten or more per cent of the issuer's or its proxy's book value of assets as of the end date of the reporting period (quarter, year) preceding the deal closure by the issuer or said entity relative to whom the fixed deadline for submittal of financial statements for the last completed reporting period preceding the deal has expired.
- 1.28. Information on a major deal, recognised as such by the Russian law, stricken by the issuer's controlling or subordinate entity having significant importance to the issuer.
- 1.29. Information on related party transactions if the amount of the latter accounts for one or more per cent of the book value of the issuer's assets as of the end date of the last completed reporting period preceding the decision of the issuer's authorised governance body to approve such transaction, and if this decision has not been taken – as of the end date of the last completed reporting period preceding the completion of this transaction by the issuer.
- 1.30. Information on any change in the amount or structure of collateral on the mortgage-backed issuer's bonds admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading) and in case of any change in the amount and (or) structure of collateral on the mortgage-backed issuer's bonds admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading) – information on such changes if they are caused by replacement of any claim secured against the mortgage constituting the mortgage coverage of the bonds, or replacement of other property constituting the mortgage coverage of the bonds which estimated value accounts for ten or more per cent of the mortgage coverage of the bonds.
- 1.31. Information on a change in the value of assets owned by an entity that has provided collateral on the issuer's bonds admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading) that accounts for ten or more per cent of the book value of such entity's assets.
- 1.32. Information on acquisition by a person (entity) of the right or lapse of the right, directly or indirectly (via entities under its control), independently or together with other entities who have signed an asset management and (or) partnership and (or) commercial mandate (agency) and (or) any other agreement whose subject is exercising the rights certified by the issuer's shares, to dispose of a certain number of votes granted by voting shares constituting the issuer's authorised capital in the said entity if the number of votes is less than 5 per cent or becomes more or less than five, ten, fifteen, twenty, twenty-five, thirty, fifty, seventy-five or ninety-five per cent of total votes falling to the share of voting stock constituting the authorised capital of such an entity.
- 1.33. Information on the issuer, its controlling or subordinate entities signing an agreement that binds them to acquire public securities of the said issuer, admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading).
- 1.34. Information on changing a stake in the authorised (joint) capital of the issuer and (or) its subordinate entities having significant importance thereto:
 - 1.34.1. by the issuer's Board members, collective executive body members, as well as a person holding the position of the issuer's sole executive body (performing its functions);
 - 1.34.2. by members of the Board of Directors (supervisory board), members of the collective executive body of the managing entity, as well as a person holding the position (performing the functions) of the managing entity's sole executive body if the powers of the issuer's sole executive body are delegated to a managing entity.
- 1.35. Information on holders of the issuer's bonds admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading) accruing and (or) lapsing of the right to demand their early redemption from the issuer.
- 1.36. Information on a dispute related to incorporation of the issuer, its management or a stake therein:

- 1.36.1. getting a notice of the intention to start legal proceedings at an arbitration court;
- 1.36.2. on commencement of proceedings by an arbitration court and accepting a statement of claim for hearing;
- 1.36.3. on changing a cause or subject of an earlier initiated action;
- 1.36.4. on interlocutory injection;
- 1.36.5. on renunciation of a claim;
- 1.36.6. on confession of a claim;
- 1.36.7. on signing of an amicable agreement;
- 1.36.8. on the court ruling that ends legal proceedings at the first instance arbitration court.
- 1.37. Information on laying claims related to satisfying obligations on the issuer's bonds admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading).
- 1.38. Information on the floatation of bonds or other financial instruments, certifying the debt liabilities to be satisfied at the issuer's expense, beyond the Russian Federation.
- 1.39. Information on acquisition (alienation) of the issuer's voting shares or securities in a foreign entity certifying the rights attributed to the issuer's voting shares and (or) the shares of its subordinate entities, save for subordinate entities who are brokers and (or) asset managers striking a deal on their own behalf but at the expense of a client who is not an issuer and (or) its subordinate entity.
- 1.40. Information on data provided by the issuer for an entity (body) based abroad, a foreign exchange and (or) other entities pursuant to the foreign law for their disclosure to foreign investors in view of the issuer's public securities floated beyond Russia, including via acquisition of a foreign entity's securities floated in accordance with the foreign law.
- 1.41. Information on a general meeting of holders of the issuer's bonds admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading), such meeting's agenda and decisions.
- 1.42. Information on the issuer of bonds admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading) naming a new representative of the bond holders.
- 1.43. Information on the issuer's authorised body taking the decision to renounce the floatation of the issuer's public securities admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading).
- 1.44. The issuer's annual consolidated financial statements and interim consolidated financial statements for the reporting period comprising six months of the reporting year, as well as information in auditor's opinions in regard of the said statements or any other document drawn with reference to the results of auditing the issuer's interim consolidated financial statements as per the auditing standards.
- 1.45. Information in the issuer's annual reports, save for earlier disclosed information.
- 1.46. Information in the issuer's annual financial statements and auditor's opinions prepared in relation to said statements.
- 1.47. Information in the issuer's quarterly reports, save for earlier disclosed information.
- 1.48. Information in the issuer's interim financial statements for the reporting period comprised of three, six or nine months of the reporting year, as well as information in auditor's opinions prepared in regard of the said audited statements.
- 1.49. Information in the report (notice) on the results of issuing (new issue) of the issuer's public securities admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading), save for the earlier disclosed information.
- 1.50. Information from the placement memo (prospectus) of the issuer's securities liable for on-exchange trading as per the decision of the issuer's Board of Directors, save for earlier disclosed information.
- 1.51. Information on the issuer signing a strategic partnership agreement or other agreement, save for the agreements specified in lines 1.17, 1.20, 1.27 – 1.29 of the present List if signing of such agreement might substantially influence the price of the issuer's public securities admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading).

- 1.52. Information on a court, arbitration court, Federal Bailiffs Service ruling injunctive remedies (including the seizure) relative to monies or other assets owned by the issuer, its controlling or subordinate entity of significant importance to the issuer, or to a person (entity) providing security or collateral on the issuer's bonds, who is not the Russian Federation providing a public warranty of the Russian Federation, an entity of the Russian Federation providing its subnational warranty, or a municipal entity providing a municipal warranty on the issuer's bonds admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading) – in the amount of ten or more per cent of the book value of assets of the said entities as of the end date of the last completed reporting period preceding the ruling regarding the injunctive remedies.
- 1.53. Information on acquisition by a person (entity) of the right or lapse of the right, directly or indirectly (via entities under its control), independently or together with other entities who have signed an asset management and (or) partnership and (or) commercial mandate (agency) and (or) any other agreement whose subject is exercising the rights certified by shares (stakes) of an entity that has provided a bail, mandate, warranty or collateral on the issuer's bonds admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading) if an entity that has provided such bail, mandate, warranty or collateral is not the Russian Federation providing a public warranty of the Russian Federation, an entity of the Russian Federation providing a subnational public warranty, or a municipal entity providing a municipal warranty on the issuer's bonds admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading) – to dispose of a certain number of votes assigned to voting shares (stakes), constituting an authorised capital of the said entity, if the above-mentioned number of votes is five per cent or has become more or less than five, ten, fifteen, twenty, twenty-five, thirty, fifty, seventy-five or ninety-five per cent of total votes falling to the share of voting stock (stakes), constituting the authorised capital of the said entity.
- 1.54. Information on instituting criminal proceedings (coming to the issuer from inquiry bodies or pretrial investigation authorities) against a member of the issuer's Board of Directors, sole executive body, controlling or subordinate entity having significant importance to the issuer, or against a person who has provided collateral on the issuer's bonds admitted to on-exchange trading (relative to which an application has been submitted for their admittance to on-exchange trading).

Information mentioned in Clauses 1.1 – 1.54 is classified as insider information whose list has been approved by Bank of Russia Ordinance No. 5326-U, dated 21 November 2019, 'On the List of Insider Information of the Legal Entities Mentioned in Clauses 1, 3, 4, 11 and 12 of Article 4 of Federal Law No. 224-FZ, Dated 27 July 2010, 'On Countering the Misuse of Insider Information and Market Manipulation and Amending Certain Laws of the Russian Federation', also on the procedure and times of its disclosure”.

- 1.55. Information in the issuer's long-term development programme approved by the Board of Directors.
- 1.56. Information in sustainable development reports signed by the issuer's authorised executives, save for earlier disclosed information, as required by the Russian stock market law.
- 1.57. The issuer's interim consolidated financial statements for the reporting period comprised of three and nine months of the reporting year, as well as information in auditor's opinions prepared in regard of the said statements or other document with reference to the results of auditing the issuer's interim consolidated financial statements as per the auditing standards.
- 1.58. Information in the decision on the issue of securities, the bond programme, as well as in the document specifying the terms of securities floatation, save for the earlier disclosed information in accordance with the requirements of the Russian law relative to the stock market.
- 1.59. Information on M&A transactions involving the issuer, including but not limited to: decisions of managing committees on matters of new company foundation, acquiring a stake in other entities, their restructuring, agreements between shareholders (stakeholders), contracts, drafts of said documents.

- 1.60. Information in draft documents as per Clauses 1.1 – 1.44, 1.46, 1.48, 1.51 – 1.54 of the present List (drafts of material facts, decisions taken at the general shareholders' meetings, decisions by the Board of Directors (committees under the Board of Directors), agreements, financial statements, orders, statements, notices and other document drafts containing insider information).
- 1.61. Issuer's quarterly report drafts.
- 1.62. Issuer's annual report drafts.
- 1.63. Issuer's sustainable development report drafts.
- 1.64. Drafts of the issuer's interim consolidated financial statements for the reporting period comprised of three and nine months of the reporting year.
- 1.65. Drafts of issue documents (the decision to issue securities, prospectuses of public securities, bond programme, a document specifying the stock floatation terms, a report (notice) on the results of stock issue (new issue)).