

APPROVED

by Order of Transneft No. 468

dated 06 December 2021

Transneft's Corporate List of Insider Information

1. The following information shall be qualified as the insider information of Transneft (hereinafter – the issuer):

1.1. Information on convening and holding of the issuer's general shareholders' meeting, declaring an issuer's general shareholders' meeting as failed (abortive), as well as about decisions taken by the issuer's general shareholders' meeting or the sole participant (the entity holding all of the voting shares) of the issuer.

1.2. Information on holding of the Board of Directors' meeting and its agenda, as well as on specific decisions taken by the issuer's Board of Directors:

1.2.1. on 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;

1.2.2. on the placement or sale of the issuer's securities;

1.2.3. on fixing the price or the procedure of fixing the price of shares or securities convertible into the issuer, to be floated;

1.2.4. on establishing the issuer's executive body and preterm suspension (revocation) of its powers, including the powers of a management company or a manager;

1.2.5. on the inclusion of candidates in the voting list for the annual issuer's general shareholders' meeting on the issue of electing members of the issuer's Board of Directors;

1.2.6. on recommendations as to the size of dividends on the issuer's shares and the procedure for their payment;

1.2.7. on the approval of the issuer's internal documents;

1.2.8. on a consent with or subsequent approval of the issuer's transaction (several interrelated transactions), recognised as a major transaction in accordance with the Russian law and (or) an interested-party transaction, as well as any other transaction (a series of related transactions) accounting for 10 per cent or more of the book value of the issuer's assets according to the financial statements as of the latest reporting date (the final date of the last completed accounting period preceding the date of approval of a transaction or the date of a transaction completion, should a decision be made about its subsequent approval);

1.2.9. on the transfer of powers of the issuer's sole executive body to a management company or manager, about the approval of a management company or manager and the terms of an agreement to be signed between issuer and management company or manager;

1.2.10. on the approval of a registrar keeping the register of the issuer's securities, the terms of an agreement therewith, as regards the keeping of the issuer's securities register, as well as about rescinding of such an agreement.

1.3. Information on making the decision to reorganise or to wind up an entity that provided security for the issuer's bonds.

1.4. Information on any signs of the issuer's bankruptcy or the entity (person) providing security for the issuer's bonds, stipulated by Federal Law No. 127-FZ, dated 26 October 2002 "On Insolvency (Bankruptcy)".

1.5. Information on acceptance by the arbitration court of an application for declaring the issuer insolvent (bankrupt), as well as about the arbitration court ruling to declare the issuer insolvent (bankrupt), introducing one of the issuer's bankruptcy proceedings or terminating bankruptcy proceedings against the issuer.

1.6. Information on the date on which the persons (entities) entitled to exercise the rights to the issuer's securities are determined.

1.7. Information on the stages of the issuer's securities issuance procedure.

1.8. Information on suspending or resuming the issue of the issuer's securities.

1.9. Information on recognising the bond programme as failed or recognising the issue (extra issue) of securities as failed or invalid.

1.10. Information on the redemption of the issuer's securities.

1.11. Information on the registration of amendments to the issuance decision, as regards any changes in the scope of rights to securities and (or) nominal value of securities, including during their consolidation or split.

1.12. Information on decision making on acquisition (occurrence of grounds for acquisition) of securities placed by the issuer.

1.13. Information on the accrued (announced) and (or) paid income on the issuer's securities, on other payments due to holders of the issuer's securities as well as about the intention to meet the commitment of making payments on the issuer's bonds, the rights to which are reflected in the register of holders of the issuer's securities.

1.14. Information on inclusion of the issuer's securities by the Russian organiser of trading in the list of securities admitted to organised trading for the sake of signing purchase and sale agreements, also the issuer's securities included by the Russian stock exchange in the quotation list, or their exclusion by the Russian organiser of

trading sessions from the list of securities admitted to organised trading for the signing of purchase and sale agreements, including the exclusion of the issuer's securities by the Russian stock exchange from the quotation list, as well as about the transfer of the issuer's securities from one quotation list to another one (exclusion of the issuer's securities from one quotation list and their inclusion in a different quotation list).

1.15. Information on the inclusion of the issuer's securities (securities of a non-resident company attesting the rights in relation to the securities of Russian issuers [hereinafter: depositary securities]) in the list of securities admitted to trading on the foreign organised (regulated) financial market, also the inclusion of such securities by a foreign stock exchange in the quotation list, and about the exclusion of the issuer's securities (depositary securities) from the list of securities admitted to trading on a foreign organised (regulated) financial market, including the exclusion of said securities from the quotation list by a foreign stock exchange.

1.16. Information on the issuer's default on its obligations to the holders of its securities.

1.17. Information on acquisition by a person (entity) or termination of the said person's (entity's) right, directly or indirectly (via entities under its control), independently or together with other related persons (entities) who have signed an asset management agreement, and (or) ordinary partnership agreement, and (or) bound by a mandate, and (or) shareholders agreement, and (or) other agreement on exercising the rights, as certified by the issuer's shares, to take charge of a certain number of votes corresponding to voting shares constituting the issuer's authorised capital, if this number of votes amounts to 5% or is more or less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 per cent of the total number of votes accrued by voting shares which constitute the issuer's authorised capital.

1.18. Information on any voluntary offer, including competitive or mandatory offers, to purchase the issuer's securities as per Chapter XI.1 of the Federal Law No. 208-FZ "On Joint Stock Companies", dated 26 December 1995 (hereinafter the "Federal Law on Joint Stock Companies"), and about any changes entered to said offers.

1.19. Information on the notice received by the issuer in accordance with Chapter XI.1 of the Federal Law "On Joint-Stock Companies" on the right to demand repurchase of the issuer's securities.

1.20. Information on the identification of errors in previously disclosed statements of the issuer (financial reporting, consolidated financial statements, accounting).

1.21. Information on the issuer or its subordinate entity striking a deal of material importance, amounting to ten or more per cent of the book value of the issuer's assets or the assets of its subordinate entity of material importance to the latter, according

to the accounting (financial) statements of the issuer or the specified organisation on the last reporting date (end date of the last completed reporting period preceding the date of the transaction).

1.22. Information on the issuer or its subordinate entity striking a deal of material importance thereto – the deal which rouses apparent interest manifested in the following signs:

1.22.1. The subject of the transaction is acquisition, disposal or the possibility of direct or indirect disposal of assets whose price and/or book value is 1 per cent or more of the consolidated value of the assets in possession of the issuer's Group, as per the issuer's consolidated financial statements on the last reporting date (the end date of the last completed reporting period preceding the date of the transaction);

1.22.2. The party with which the issuer or its subordinate entity having material importance thereto enters into a transaction is

- the issuer's controlling entity or a person (entity) holding the position (performing the functions) of the issuer's sole executive body, or a member of the issuer's governance board;

- an entity, subordinate to persons (entities) mentioned in the second paragraph of this subparagraph, provided that such entity is not simultaneously controlled by the issuer.

1.23. Information on changes in the make-up and (or) amount of collateral on the issuer's secured bonds.

1.24. Information on acquisition by the issuer or termination of its right to dispose of a certain number of votes attributable to the voting shares (stakes) of a company, which constitute its authorised capital, the securities being admitted to organised trading, directly or indirectly (through subordinate entities), independently or jointly with other persons (entities) connected with the issuer via a trust management agreement, and (or) ordinary partnership, and (or) mandate, and (or) shareholders agreement, and (or) other agreement whose subject is implementation of rights, certified by shares (stakes) admitted to organised trading, if the said number of votes is 5 per cent, or has exceeded (fallen below) 5, 10, 15, 20, 25, 30, 50, 75 or 95 per cent of the total number of votes attributable to voting shares (stakes) constituting the authorised capital of the said company.

1.25. Information on a person (entity) controlling the issuer or an entity under the issuer's control signing an agreement providing for the obligation to acquire the issuer's securities.

1.26. Information on acquisition by holders of the issuer's shares of the right and (or) termination of the right to demand early redemption of issuer's bonds held by them.

1.27. Information on assignment of a rating to securities and (or) their issuer as well as about a change of the rating by a credit rating agency or other organisation based on an agreement with the issuer.

1.28. Information on the initiation of court proceedings in a dispute related to the establishment, management of or participation in the issuer (hereinafter: corporate dispute), or any other dispute with the issuer being the plaintiff or defendant and the amount of claims amounting to 10 percent or more of the book value of the assets as of the data of the issuer's accounting (financial) statements on the last reporting date (end date of the last completed reporting period preceding the date of the court decision on the statement of claim) (hereinafter: material dispute), as well as on the court ruling crowning a corporate or substantive dispute, except for information about corporate and substantive disputes:

- related to the issuer's shares (stakes) representing less than 10 percent of the issuer's authorised capital, or exercising the rights arising therefrom;
- related to the division of inherited property or the joint property of spouses;
- arising from the activities of the registrar in connection with operations with the issuer's securities register.

1.29. Information on the placement outside the Russian Federation of bonds or other financial instruments certifying loan obligations to be fulfilled at the issuer's expense.

1.30. Information on the Bank of Russia's decision to exempt the issuer from the obligation to disclose information in accordance with Article 30 of Federal Law No. 39 dated 22 April 1996 "On the Stock Market" (hereinafter – Federal Law "On the Stock Market").

1.31. Information on the acquisition (alienation) of the issuer's voting shares or depositary securities by the issuer or its subordinate entity, except when the issuer's voting shares (depositary securities certifying the rights in respect of the issuer's voting shares) are acquired in the process of the issuer's voting stock placement, or acquisition (alienation) of the issuer's voting shares (depositary securities certifying the rights in respect of the issuer's voting shares) by a broker and (or) trust manager, acting on its own behalf but at the client's expense in pursuance of the client's brokerage commission.

1.32. Information on the holding and agenda of the issuer's general bondholders meeting, decisions taken by the issuer's general bondholders meeting, as well as about declaring the issuer's general bondholders meeting invalid.

1.33. Information on the issuer of bonds naming a representative of the bondholders after registration of the bond issue.

- 1.34. Information on the date of the bondholders' representative starting to exercise his/her powers.
- 1.35. Information on the issuer signing an agreement of novation or granting of compensation entailing the termination of liabilities on the issuer's bonds.
- 1.36. Information on the holders of the issuer's convertible securities being entitled to demand conversion of the issuer's convertible securities they own.
- 1.37. Information on the issuer's annual consolidated financial statements or interim consolidated financial statements for the reporting period consisting of 6 months of the reporting year, as well as information contained in the auditor's reports prepared in respect thereof or any other document based on the audit of interim consolidated financial statements in accordance with the auditing standards.
- 1.38. Information contained in the issuer's annual reports, except for the previously disclosed information.
- 1.39. Information constituting the issuer's interim accounting (financial) statements for the reporting period comprising 3, 6 or 9 months of the reporting year together with information contained in the auditor's reports prepared in respect of the said statements if the said statements have been audited, and information constituting the issuer's annual accounting (financial) statements together with the auditor's report thereon if the same have been audited.
- 1.40. Information contained in the reports of issuers of the issue-grade securities, drawn up for reporting periods comprised of 6 and 12 months, except for the previously disclosed information.
- 1.41. Information contained in the issuer's securities prospectus, except for the previously disclosed information.
- 1.42. Information constituting the terms of securities placement as determined by the issuer in a separate document, except for the earlier disclosed information (if there is no securities prospectus or the securities prospectus does not contain the terms of securities placement).
- 1.43. Information on the issuer signing a strategic partnership agreement or other agreement (transaction), except for agreements (transactions) stipulated by items 1.21, 1.22 and 1.27 of this List, if the signing of such agreement (transaction) may have a material effect on the price of the issuer's securities admitted to organised trading (in respect of which an application for admission to organised trading has been submitted).
- 1.44. Information on interim measures (including seizure) taken by the court, arbitration court, Federal Bailiff Service in relation to cash or other property belonging to the issuer, its controlling or subordinate organisation of material

importance to the issuer, or provider of security (collateral) for the issuer admitted to organised trading (in relation to which an application for admission to organised trading was submitted) to an entity which is not the Russian Federation providing a state guarantee of the Russian Federation, an entity of the Russian Federation providing a state guarantee of an RF entity, or a municipality providing a municipal guarantee (security) accounting for 10 or more per cent of the book value of the assets owned by said entities on the last day of a latest completed reporting period that precedes the adoption of interlocutory injunction.

1.45. Information on the acquisition or termination by an entity (person) of the right, directly or indirectly (through subordinate entities), independently or jointly with other entities that have signed a contract of trust management of property, and (or) simple partnership, and (or) the agency, and (or) shareholder agreement, and (or) other agreement therewith, the subject of which is the exercise of rights, certified by shares (stakes) of the entity providing a bail, warranty or collateral on the issuer's bonds admitted to organised trading (in respect of which the application for admittance to organised trading has been filed) unless the entity providing such bail, security or collateral on such bonds is the Russian Federation providing a state guarantee of the Russian Federation, an entity of the Russian Federation providing a state guarantee of an RF entity, or a municipality providing a municipal guarantee (security) - to dispose of a certain number of votes constituting 5 per cent or has exceeded or fallen below 5, 10, 15, 20, 25, 30, 50, 75 or 95 per cent of the total number of votes attributable to voting shares (stakes) constituting the authorised capital of the said entity.

1.46. Information on the initiation of criminal proceedings (received by the issuer from preliminary investigation or enquiry authorities) against a person who is a member of the issuer's governing bodies, an entity controlling the issuer or subordinate to the issuer, which is of material importance thereto, or a person (entity) who provided security for the issuer's bonds admitted to organised trading (in respect of which an application for admission to organised trading has been filed).

1.47. Information contained in materials serving as the basis for the issuer's governing bodies, except for the general shareholders meeting, for taking decisions which may have a material effect on the price of the issuer's securities admitted to organised trading (in respect of which an application for admission to organised trading has been filed), except for the previously disclosed information.

1.48. Information on other events (actions) which, in issuer's opinion, may have significant impact on value or quotation of its securities.

Information specified in clauses 1.1-1.48 pertains to Insider Information, its list being approved by the Bank of Russia's Order No. 5946-U dated 27 September 2021 "On the List of Insider Information of Legal Entities specified in Clauses 1, 3, 4, 11

and 12 of Article 4 of Federal Law No. 224-FZ dated 27 July 2010 "On Combating Insider Information Misuse and Market Manipulation and on Amendments to Certain Legislative Acts of the Russian Federation" as well as on the Procedure and Timing of its Disclosure".

1.49. Information contained in the Long-Term Development Programme approved by the issuer's Board of Directors.

1.50. Information contained in the sustainability reports signed by the issuer's authorised persons, except for the earlier disclosed information.

1.51. Information constituting the issuer's interim consolidated financial statements for the reporting period consisting of three and nine months of the reporting year, as well as information contained in the auditor's reports prepared in relation to the said statements or any other document based on the audit of interim consolidated financial statements in accordance with the auditing standards.

1.52. Information contained in the decision on the issue of securities, bond programme, report on the results of an issue (extra issue) of securities, except for the previously disclosed information.

1.53. Information on merger and acquisition transactions with the issuer participating, including but not limited to: the decisions of governing bodies on the incorporation of new entities, acquiring a stake in other companies, their reorganisation, shareholders (stakeholders) agreements, contracts or drafts of the documents mentioned above.

1.54. Information contained in the draft documents in accordance with clauses 1.1 - 1.36, 1.39, 1.43 - 1.46, 1.48 of the present List (draft statements of material facts, resolutions of general shareholders' meetings, decisions made by the Board of Directors [Committees under the Board], contracts, financial statements, orders, declarations, notices and other draft documents containing insider information).

1.55. Draft reports by the issuer of issuable securities.

1.56. Draft annual reports of the issuer.

1.57. Drafts of the issuer's sustainable development reports.

1.58. Draft annual consolidated financial statements of the issuer, interim consolidated financial statements of the issuer for the reporting period consisting of three, six and nine months of the reporting year, as well as information contained in the audit report prepared in relation to those statements or another document prepared on the basis of an audit of interim consolidated financial statements (financial statements) in accordance with the auditing standards.

1.59. Draft issuance documents (decision on the issue of securities, a securities prospectus, bond programme, a document containing the terms of securities placement, report on results of an issue [extra issue] of securities).

Note. Information contained in the resolution on the issue of securities, report on the results of the issue (extra issue) of securities, specified in Clauses 1.52 and 1.59, shall be classified as insider information of Transneft, PJSC, whenever the securities are floated via public subscription and (or) the securities issue procedure is accompanied by registration of a securities prospectus (notifying of preparation of a securities prospectus).