

DISCLAIMER

Rosneft and the Rosneft Group Entities (hereinafter referred to as the Company) strive in their activities to ensure full and unconditional observance of human rights in accordance with the Constitution of the Russian Federation, the Social Charter of Russian Business, as well as generally recognized principles and norms of international law, including the UN Universal Declaration of Human Rights, the ILO Declaration of Fundamental Principles and Rights at Work, and the principles of the UN Global Compact.

The Company's adherence to the international principles of fair conduct and business interaction is fundamental to its success. The management of Rosneft is aware of and recognizes the principles of human rights and the importance of their implementation in the activities of the Company and all of its counterparties. The Company believes that the adoption of this Code will help increase the investment attractiveness of the Company and build more constructive and trusting relationships with the Company's Suppliers¹.

The Company encourages Suppliers to implement the principles set out in this Code in their activities, approve this Code and strictly abide by the principles set out herein. The Company expects that Suppliers will apply the provisions of this Code to all of their employees and contractors throughout the supply chain of goods, works and services.

If a Supplier has a similar approved document related to human rights observance, it is recommended, if required, to revise it in order to make relevant changes in accordance with this Code, as well as to comply with international, national and corporate standards and rules in the area of human rights observance.

Suppliers are encouraged to inform the Company of the actions taken after the principles of this Code have been approved.

The Company shall under no circumstances be liable for the fulfillment or non-fulfillment by the Supplier of this Code principles and provisions.

¹ Supplier is a legal entity or individual, including an individual entrepreneur (or an association of such entities), capable of products supply on legal grounds, also in accordance with the requirements established in the procurement documentation.

ROSNEFT CODE OF SUPPLIERS OF GOODS, WORKS AND SERVICES IN THE AREA OF HUMAN RIGHTS OBSERVANCE

I. KEY PRINCIPLES

1. Ensuring fair treatment and non-discrimination

The Supplier shall ensure equal opportunities in employment and work, take all measures to prevent any discrimination against its employees, e.g. on grounds of gender identity, age, race, color, religion or belief, disabilities and health, ethnic, national and social origin, marital status, political and other views, trade union membership, property and other characteristics.

The Supplier shall oppose any form of physical or psychological abuse, harassment, humiliation, or insult to human dignity.

The Supplier shall be aware of the requirement to implement an effective control system aimed at identifying and preventing any cases of discrimination and harassment of employees, regardless of the type of employment; communicate the policy of intolerance to discrimination and harassment to employees of all levels, and also develop ways of prompt reporting on problems and violations in this area.

2. Prohibition of slavery and forced labor

The Supplier shall take effective measures to ensure that the work environment is mutually agreed, fair and transparent, and it rules out direct or indirect physical or financial coercion, threats of fines or penalties, or other forms of mistreatment.

The application of international and national human rights standards shall be a part of the Supplier's normal business practices. The recruitment of workers throughout the supply chain of the Supplier's goods, works and services shall avoid the risk of forced labor, modern slavery or human trafficking. This means that the employees shall clearly understand the conditions of the intended employment and voluntarily agree to these conditions.

The Supplier shall not keep identity documents or work permits as a condition of the employee's employment.

It is the intention of the Supplier to notify the appropriate authorities of any actual or perceived contemporary slavery or forced labor.

3. Safe, reliable and healthy working environment

The Supplier shall pay special attention to the requirements of occupational health and safety at the workplace, ensuring the right of its employees to a healthy environment.

The Supplier that provides or recommends housing to its employees shall make sure that the employees' health and safety standards are met when they use the living premises.

The Supplier shall take all practical and reasonable measures to prevent death, work injury or ill health of its employees.

The Supplier shall meet its obligations to create comfortable and safe working conditions in accordance with the applicable occupational safety requirements established by the national legislation of the Supplier's country of residence and the country of its business activities, in accordance with sanitary and epidemiological rules and regulations and/or other legal documents of the Supplier's jurisdictions, as well as the norms of international law.

4. Environmental liability

The Supplier shall comply with the requirements of the environmental protection legislation and take measures to ensure environmental safety.

The Supplier shall take measures to reduce the negative impact of its activities on the environment and climate change.

The Supplier shall strive to use natural resources rationally and take all possible measures to protect them.

The Supplier shall take measures to preserve ecosystems and biodiversity.

The Supplier shall fully interact with the Company to study and assess the risks of its production activities footprint on the environment, optimize approaches to environmental protection and implement the appropriate management systems.

5. Respect for freedom of assembly, association and the right to collective agreements

The Supplier shall respect the rights of its employees to freedom of assembly, creation of trade unions, associations and making collective agreements.

The Supplier shall constructively cooperate with trade unions to resolve disputes, it shall not discriminate against employee representatives, and shall not interfere with their representative functions. Where these rights are limited by a national law, the Supplier shall promote alternative means of employee representation, including work committees and forums.

6. Fair remuneration for work and working conditions

The Supplier shall intend to provide its employees with timely and decent remuneration for work, safe working conditions and adequate time for rest, acting in accordance with applicable laws governing the relationship between employer and employee, collective agreements and international human rights standards.

The Supplier shall manage employees' working time responsibly. The working hours shall be fixed in the employment contracts with the Supplier's employees. If overtime work is required, payment for such work shall be made in accordance with the applicable laws of the country of the Supplier's residence and the country in which it pursues business.

The Supplier shall recognize that its employees must receive decent wages to maintain their well-being and the well-being of their families, including the provision of catering, accommodation, clothing, health care and essential social services. The wages or salary paid must be established by the employment contract in accordance with the Supplier's remuneration system. Any kind of discrimination in the establishment or modification of the terms of remuneration shall be prohibited. The wages of an employee who has fully worked for certain standard working hours and discharged his job duties shall not be lower than the minimum wage established by the applicable norms of the national legislation of the country of residence, taking into account the relevant legislation of the country of business.

The Supplier shall provide its employees with all guarantees and compensations stipulated by the labor legislation of the country of residence, country of location and generally recognized norms of international law.

7. Anti-Corruption

The Supplier shall maintain a zero-tolerance policy for corruption and fraud and shall not tolerate any form of illegal business conduct (bribery, extortion, misappropriation of property, corrupt business practices).

The Supplier shall use all assets for their intended purpose, preventing unauthorized and illegal use of property for corruption purposes.

The Supplier shall oppose involvement in money laundering.

The Supplier shall promote the culture of honesty and integrity based on the principles of transparency, legal compliance and ethical business practices.

The Supplier shall take control measures aimed at identifying and suppressing corruption offenses.

The Supplier shall understand the risks of corruption and fraud and shall intend to notify the appropriate authorities of any actual or suspected abuse of office.

8. Prevention of child labor and protection of young employees

The Supplier shall condemn the use of child labor and shall be committed to taking steps to identify and counter the exploitation of child labor. If child labor is identified, the Supplier shall notify the relevant authorities. With regard to persons under the age of majority, employment relations shall commence in strict accordance with ILO Convention on the minimum age for admission to work and the applicable legislation of the country of business.

The Supplier shall adhere to the policy that prohibits exploitation of minors and shall communicate it to all employees and external business partners, and shall implement a robust selection process for employees and third-party recruitment and employment agencies.

The Supplier shall provide young employees with comprehensive professional development support by providing an experienced mentor to guide them in adapting to the work process and organizing special training courses.

9. Respect for the human rights of all community members in the course of business

The Supplier shall respect and observe the internationally recognized human rights and freedoms of all community members, including the rights to use land, water and other natural resources.

The Supplier shall pursue constructive interaction with community members who may be affected by the Supplier's activities, including outside the immediate geographic proximity, in order to minimize the negative impact (environmental, social, economic) from its activities.

The Supplier shall seek to develop interaction with the local population of the regions of the Supplier's presence on the basis of respect and mutual benefit, and shall also seek to preserve the their traditional way of life of indigenous small-numbered peoples, their business and crafts, and the original habitat.

10. Providing access to remedies

The Supplier shall provide effective legal protection of its employees in the event of human rights and freedoms violation that occurred through the Supplier's activities, e.g. by considering requests from stakeholders and organization of interaction.

Everyone whose human rights and freedoms are violated shall have the right to an effective remedy in accordance with international and national law.

11. Feedback

The Supplier shall accept complaints through an internal, reliable and confidential complaints mechanism for effective and efficient interaction with stakeholders, including those related to human rights observance.

Contacts²: _____

The Supplier shall guarantee the confidentiality and security of messages transmission.

II. APPLICATION AND OBSERVANCE OF THE CODE

By accepting this Code, the Supplier undertakes to:

² If this Code is approved as an internal document, then this field is recommended to be deleted.

- notify its employees and contractors of the provisions of the Code;
- if necessary, explain the principles of this Code to its employees and contractors;
- extend this Code to the entire supply chain of goods, works and services;
- timely monitor compliance with the principles of this Code throughout its supply chain of goods, works and services;
- verify (as required) its counterparties involved in the supply chain of goods, works and services, or require them to provide information regarding compliance with this Code.

In the event of violations by any of the participants in the supply chain of goods, works and services, the Supplier reserves the right to suspend or terminate cooperation, or report all facts of alleged or actual non-compliance with certain provisions of the Code to its partners and counterparties.