

ATTACHMENT

to Order of PJSC NK Rosneft
No. 199 dated 02.04.2018

LIST OF DATA CONSTITUTING INSIDER INFORMATION

Insider information of issuer PJSC NK Rosneft includes the following information:

1. on convocation and holding the General Shareholders meeting of Rosneft, including the agenda, date of holding, date of making the list of persons entitled to take part in the General Shareholders meeting of Rosneft as well as on decisions taken by the General Shareholders meeting of Rosneft;
2. on the agenda of the Meeting of the Board of Directors of Rosneft as well as on decisions taken by them;
3. on facts of non-taking by the Board of Directors of Rosneft the following decisions that must be taken in compliance with the federal laws:
 - 3.1. on convocation of the General Shareholders meeting of Rosneft as well as on other decisions related to preparation, convocation and holding the General Shareholders meeting of Rosneft;
 - 3.2. on convocation (holding) or on refusal to convene (hold) an extraordinary General Shareholders meeting of Rosneft, on demand of the Auditing Commission of Rosneft, the auditor of Rosneft or shareholder(s) who is(are) holder(s) of at least 10 (ten) percent of the voting shares of Rosneft.
 - 3.3. on including or on refusal to include the issues included in the agenda of the General Shareholders meeting of Rosneft, and the proposed nominees - to the list of candidates for voting on elections to the respective body of Rosneft, who have been proposed by a shareholder (shareholders) who is (are) holders of total at least 2 (two) percent of Rosneft's voting shares;
 - 3.4. on formation of the sole executive body of Rosneft in 2 (two) successive meetings of the Board of Directors of Rosneft or within 2 (two) months from the date of ceasing or expiry of the powers of the earlier formed of the sole executive body of Rosneft in the case provided for by clause 6 of Article 69 of Federal Law of 26.12.1995 No. 208-FZ "On Joint-Stock Companies";
 - 3.5. on early termination of the sole executive body of Rosneft in 2 (two) successive meetings of the Board of Directors of Rosneft in the case provided for by clause 7 of Article 69 of Federal Law of 26.12.1995 No. 208-FZ "On Joint-Stock Companies";
 - 3.6 on convening (holding) an extraordinary General Shareholders meeting of Rosneft if the number of the Rosneft Board members becomes less than the number forming the quorum for holding a meeting of the Board of Directors of Rosneft;
 - 3.7. on forming a temporary sole executive body of Rosneft and holding an extraordinary General Shareholders meeting of Rosneft for resolving the issue of early termination of the powers of its sole executive body or managing company (manager) and on forming a new sole executive body of Rosneft, or on transfer of the powers of its sole executive body to the managing company (manager) when the Board of Directors of Rosneft takes a decision on suspending the powers of its sole executive body or the powers of the managing company (manager);

3.8. on recommendations in respect of the voluntary proposal, including a competing or mandatory proposal, by Rosneft, including evaluation of the proposed price of the purchased issue-grade securities and possible change of their market value after purchase, assessment of the plans of the person who has sent the voluntary proposal, including a competing or mandatory proposal, in respect of Rosneft, including in respect of his/her/its employees;

4. on sending to Rosneft an application for including into the Uniform State Register of Legal Entities entries related to reorganization, termination of activities or liquidation of Rosneft, and in case of taking by the body that effects state registration of legal entities of a decision to refuse inclusion of the said entries - information on taking such decision;

5. on appearing of a controlled entity of Rosneft that is significant for it, as well as on ceasing of the grounds for control over such entity;

6. on appearing of an entity controlling Rosneft, as well as on ceasing of the grounds for such control;

7. on taking a decision on reorganization or liquidation by a company controlling Rosneft, controlled by Rosneft, which is of a significance for it, or by a person who has provided security on Rosneft bonds, if in respect of the person who has provided such security and (or) bonds on which it has been provided there are observed the terms and conditions provided for by clause 1.3. of the Notes to this List;

8. on sending by a company controlling Rosneft, controlled by Rosneft, which is of a significance for it, or by a person who has provided security on Rosneft bonds, if in respect of the person who has provided such security and (or) bonds on which it has been provided the terms and conditions provided for by clause 1.3. of the Note to this List are observed, of an application on including into the Uniform State Register of Legal Entities of entries related to reorganization, termination of activities or liquidation of the said organizations;

9. on appearance with Rosneft, with its controlling entity, with an entity controlled by Rosneft, which is of a significance for it, or with a person who has provided security on Rosneft bonds, if in respect of the person who has provided such security and (or) bonds on which it has been provided the terms and conditions provided for by clause 1.3. of the Note to this List are observed, of features pointing to its insolvency (bankruptcy) envisaged by the Russian Federation insolvency (bankruptcy) laws;

A controlled entity/organization is a legal entity under direct or indirect control of the controlling person/entity (Article 2 of Federal Law of 22.04.1996 No. 39-FZ "On Securities Market").

Organizations controlled by Rosneft that have significance for it are organizations controlled by Rosneft, each of which is accountable for at least 5 percent of consolidated assets value or at least 5 percent of consolidated income, determined as per the data of the latest consolidated financial statements of Rosneft, other organizations controlled by Rosneft which in its opinion have significant impact on the financial situation, financial performance and changes of financial situation of the group of companies that Rosneft and its controlled entities are part of (cl. 18.3.1 of Regulations on disclosure of information by issuers of issue-grade securities, approved by the Bank of Russia on 30.12.2014 No. 454-P).

A controlling entity/organization is a person/entity that has the right to directly or indirectly (via its controlled persons) dispose of by over 50 percent of votes in the supreme management body of a controlled entity (Rosneft), by force of participation in the controlled entity (Rosneft) and (or) based on agreements on trust management of property and (or) simple partnership and (or) agency

and (or) shareholder agreement and (or) other agreement the subject of which is exercising of rights certified by shares (equity) of the controlled entity (Rosneft); or the right to appoint (elect) the sole executive body and/or over 50 percent of the composition of the collegial management body of the controlled entity (Rosneft) (Article 2 of Federal Law of 22.04.1996 No. 39-FZ "On Securities Market").

10. on accepting by a commercial court of an application for recognising Rosneft, its controlling entity, an entity controlled by Rosneft, which is of a significance for it, or a person who has provided security on Rosneft bonds, if in respect of the person who has provided such security and (or) bonds on which it has been provided the terms and conditions provided for by clause 1.3. of the Note to this List are observed, bankrupt, as well as on taking by a commercial court of a decision on recognising the aforementioned entities bankrupt, on initiation of one of bankruptcy proceedings in respect of one of them, on termination of bankruptcy proceedings in respect of one of them;

11. on bringing an action against Rosneft, its controlling entity, an entity controlled by Rosneft, which is of a significance for it, or against a person who has provided security on Rosneft bonds, if in respect of the person who has provided such security and (or) bonds on which it has been provided the terms and conditions provided for by clause 1.3. of the Notes to this List are observed, with the amount of claims equal to or exceeding 10 (ten) percent of the balance value of the aforementioned entities' assets as of the end date of the last completed reporting period preceding such action, or any other claim which, if granted, may in Rosneft's opinion significantly impact the financial and business situation of Rosneft and the aforementioned entities;

12. on the date on which the persons entitled to exercising their rights to Rosneft's issue-grade securities shall be determined, including on the date on which the list of persons having the right to take part in the General Shareholders meeting of Rosneft shall be made, if there are observed the terms and conditions provided for by clause 1.2. of the Notes to this List;

13. on taking by the authorised bodies of Rosneft the following decisions, if there are observed the terms and conditions provided for by clause 1.1. of the Notes to this List:

13.1 on placement of issue-grade securities of Rosneft;

13.2 on the starting date of placement of issue-grade securities of Rosneft;

13.3 on suspending of placement of issue-grade securities of Rosneft;

13.4 on refusal from placement of issue-grade securities of the issue (additional issue) of Rosneft;

14. on completion of placement of issue-grade securities of Rosneft, if there are observed the terms and conditions provided for by clause 1.1 of the Notes to this List;

15. on sending (submitting) by Rosneft of an application for state registration of an issue (additional issue) of issue-grade securities, registration of a securities prospectus, state registration of a bonds program, state registration of amendments to be introduced into the decision on issue (additional issue) of issue-grade securities and (or) in their prospectus, state registration of amendments to a bonds program, to the terms and conditions of issue (additional issue) of bonds and (or) their prospectus within the framework of a bonds program, state registration of the report on the results of issue (additional issue) of issue-grade securities, if there are observed the terms and conditions provided for by clause 1.1. of the Notes to this List;

16. on sending (submitting) by Rosneft of a notice on the results of issue (additional issue) of issue-grade securities, if there are observed the terms and conditions provided for by clause 1.1. of the Notes to this List;

17. on decision of a commercial court to recognize an issue (additional issue) of issue-grade securities of Rosneft invalid;

18. on redemption of issue-grade securities of Rosneft, if there are observed the terms and conditions provided for by clause 1.2 of the Notes to this List;

19. on income accrued and (or) paid on issue-grade securities of Rosneft, if there are observed the terms and conditions provided for by clause 1.2. of the Notes to this List;

20. on conclusion by Rosneft of a contract with a Russian trade organiser on including Rosneft's issue-grade securities allowed for trading on a stock exchange by a Russian trade organiser, as well as of a contract with a Russian stock exchange on including Rosneft's issue-grade securities into a Russian stock exchange's quoting list;

21. on concluding by Rosneft of a contract for including Rosneft's issue-grade securities or a foreign issuer's issue-grade securities, certifying the rights in respect of Rosneft's issue-grade securities, into the list of securities allowed for trading on a foreign organized (regulated) financial market, as well as of a contract with a foreign stock exchange for including such securities into a foreign stock exchange's quoting list;

22. on including Rosneft's issue-grade securities or a foreign issuer's issue-grade securities, certifying the rights in respect of Rosneft's issue-grade securities, into the list of securities allowed for trading on a foreign organized (regulated) financial market, and on withdrawal of such securities from the said list, as well as on including such securities into a foreign stock exchange's quoting list or on their withdrawal from the said list;

23. on conclusion by Rosneft of a contract on maintaining (stabilisation) of prices for Rosneft's issue-grade securities (foreign issue's securities certifying the rights in respect of Rosneft's securities), on the terms and conditions of the said contract as well as on termination of such contract, if there are observed the terms and conditions provided for by clause 1.2. of the Notes to this List;

24. on lodging by Rosneft an application for obtaining the Bank of Russia's permit for placement and (or) arranging for stock trading of its issue-grade securities outside the borders of the Russian Federation;

25. on failure of Rosneft to comply with its obligations towards holders of its issue-grade securities;

26. on acquisition by a person of, or termination a person's right to directly or indirectly (via its controlled entities), independently or jointly with other persons, related to it by assets trust management contract, and (or) simple partnership contract, and (or) agency contract, and (or) shareholder agreement, and (or) other agreement, the subject thereof being exercising of the rights certified by Rosneft shares, to dispose of a certain number of votes associated with the voting shares forming Rosneft's charter capital, if the aforementioned number of votes amounts to 5 (five) percent or has exceeded or has become less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes associated with the voting shares forming Rosneft's charter capital;

27. on a voluntary proposal, including a competing or mandatory proposal, received by Rosneft pursuant to Chapter XI.1 of Federal Law of 26.12.1995 No. 208-FZ "On Joint-Stock Companies",

for purchase of its issue-grade securities, as well as on amendments introduced into the aforementioned proposals;

28. on a notice regarding the right to demand repurchase of Rosneft's issue-grade securities or demand for repurchase of Rosneft's issue-grade securities, received by Rosneft pursuant to Chapter XI.1 of Federal Law of 26.12.1995 No. 208-FZ "On Joint-Stock Companies";

29. on finding mistakes in the earlier disclosed accounting (financial) statements of Rosneft, if such mistakes can have significant impact on the price of Rosneft's issue-grade securities;

30. on performing by Rosneft, or by a person who has provided security on Rosneft bonds, if in respect of the person who has provided such security and (or) bonds on which it has been provided the terms and conditions provided for by clause 1.3. of the Note to this List are observed, of a transaction for the amount equal to or exceeding 10 or more percent of the balance value of Rosneft's assets or of the said person's assets as of the end date of the latest completed reporting period preceding the performance of the transaction;

31. on performance by an organization controlling Rosneft or by an organization controlled by Rosneft, that is of significance for it, of a transaction that is deemed a major transaction under the laws of the Russian Federation;

32. on performance by Rosneft of an interested-party transaction, if the amount of such transaction is equal to or exceeds 1 (one) percent or more of the balance value of Rosneft's assets as of the end date of the latest completed reporting period preceding taking the decision on approval of performance of the transaction by Rosneft's authorized management body, and if the decision approving the performance of the transaction has not been taken - as of the date of the latest completed reporting period preceding the performance of such transaction by Rosneft;

33. on changing the composition and (or) size of the subject of the pledge on Rosneft's bonds with pledge, if the terms and conditions provided for by clause 1.3. of the Note to this List are observed in respect of such bonds, and in case of changing of the composition and (or) size of the subject of the pledge on Rosneft's bonds with mortgage collateral - the information about such changes, if they have been triggered by change of any claim secured by mortgage, constituting the bonds mortgage collateral, the cost (appraised monetary value) of which amounts to 10 (ten) or more percent of the bonds mortgage collateral amount;

34. on changes of the cost of the assets of the person who has provided security on Rosneft bonds, if in respect of the person who has provided such security and (or) bonds on which it has been provided the terms and conditions provided for by clause 1.3. of the Note to this List are observed, which amounts to 10 (ten) or more percent, or on any material change of such person's financial and business situation that shall be deemed such by Rosneft;

35. on acquisition by Rosneft or termination of Rosneft's right to directly or indirectly (via its controlled entities), independently or jointly with other persons, related to Rosneft by assets trust management contract, and (or) simple partnership contract, and (or) agency contract, and (or) shareholder agreement, and (or) other agreement, the subject thereof being exercising of the rights certified by the shares (equity) of the organization whose issue-grade securities have been cleared for on-exchange trading or whose assets value exceeds 5 (five) billion roubles, to dispose of a certain number of votes associated with the voting shares forming the said organization's charter capital, if the aforementioned number of votes amounts to 5 (five) percent or has exceeded or has become less than 5 or 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of votes associated with the voting shares forming such organization's charter capital;

36. on acquisition by a person of, or termination of the person's right to directly or indirectly (via its controlled entities), independently or jointly with other persons, related to it by assets trust management contract, and (or) simple partnership contract, and (or) agency contract, and (or) shareholder agreement, and (or) other agreement, its subject being exercising of the rights certified by the shares (equity) of the organization that has provided security for Rosneft's bonds, if in respect of the person who has provided such security and (or) the bonds in respect of which it has been provided the terms and conditions provided for by clause 1.3. of the Note to this List are observed, to dispose of a certain number of votes associated with the voting shares (equity) constituting such organization's charter capital, if the aforementioned number of votes amounts to 5 (five) percent or has exceeded or has become less than 5, 10, 15, 20, 25, 30, 50, 75 or 95 percent of the total number of the votes associated with the voting shares (equity) constituting such organization's charter capital;

37. on concluding by Rosneft, its controlling person or by a company controlled by Rosneft of a contract providing for the obligation to acquire issue-grade securities of Rosneft, if there are observed the terms and conditions provided for by clause 1.2. of the Notes to this List;

38. on receipt, suspension, revival, re-issue, recalling (annulment) or termination for any other reasons of the validity of the permit (license) issued by Rosneft for engaging into certain activities that have significant financial and business meaning for Rosneft;

39. on termination of the term of powers of the sole executive body and (or) members of a collegial executive body of Rosneft;

40. on changing of the size of interest/share in the charter capital of Rosneft and its controlled organizations that have significant meaning for it:

- of persons who are Rosneft Board members, Rosneft collegial executive body members. as well as of the person working in the position (performing the functions) of Rosneft's sole executive body;
- of persons who are Board members (Advisory Board members), collegial executive body members in the managing company, as well as of persons working in the position (performing the functions) of the managing company sole executive body in cases where the powers of Rosneft's sole executive body have been assigned to the managing company;

41. on emerging and ceasing of the right of holders of Rosneft bonds to demand from Rosneft early redemption of the Rosneft bonds held by them, if there are observed the terms and conditions provided for by clause 1.2 of the Notes to this List;

42. on involvement or replacement of organizations rendering agency services to Rosneft during performance by Rosneft of its obligations related to Rosneft's bonds or other issue-grade securities, with indication of their names, locations and amounts of remunerations for their services, as well as on changes in these data;

43. on any disputes related to creation of Rosneft, its management or participation therein, if a decision on this dispute may have significant impact on the price of Rosneft's issue-grade securities;

44. on any claims related to performance of obligations on such bonds, lodged in respect of the person who has provided security on Rosneft bonds, if in respect of the person who has provided such security and (or) bonds on which it has been provided the terms and conditions provided for by clause 1.3. of the Note to this List are observed;

45. on placement outside the borders of the Russian Federation of bonds or other financial instruments certifying the loan obligations to be complied with at Rosneft's expense;
46. on purchase (alienation) of Rosneft's voting shares or a foreign issuer's securities certifying the rights in respect of Rosneft's voting shares, by Rosneft and (or) Rosneft's controlled organizations, with exception of those controlled organizations that are brokers and (or) trustees and have performed the transaction in their own name but at the expense of their client who is not Rosneft and (or) its controlled organization;
47. sent or provided by Rosneft to the respective body (respective organisation) of a foreign state, to a foreign exchange and (or) to other organisations pursuant to foreign law for the purposes of its disclosure or provision to foreign investors in connection to placement or stock trading of Rosneft's issue-grade securities outside the Russian Federation, including by purchase of a foreign issuer's securities being placed (placed) pursuant to foreign law, if such information can have significant impact on the price of Rosneft's issue-grade securities;
48. constituting annual accounting (financial) statements and consolidated financial statements of Rosneft as well as contained in auditor's opinions prepared in respect of the said statements;
49. constituting intermediary accounting (financial) statements and consolidated financial statements of Rosneft for a reporting period consisting of three, six or nine months of the current year, as well as contained in auditor's opinions prepared in respect of the said statements;
50. constituting the terms and conditions of placement of issue-grade securities defined in a decision approved by Rosneft's authorized body regarding issue (additional issue) of securities, by an approved bonds program, by approved bonds issue (additional issue) terms and conditions within a bonds program, subject to compliance with the terms and conditions provided for by clause 1.1. of the Note to this List, with the exception of information which has been disclosed earlier in compliance with the requirements of the Russian securities market legislation;
51. contained in the report (notice) on the results of issue of issue-grade securities approved by an authorized body of Rosneft, if there are observed the terms and conditions provided for by clause 1.1. of the Note to this List, with the exception of information which has been disclosed earlier in compliance with the requirements of the Russian securities market legislation;
52. contained in a securities prospectus approved by Rosneft's authorized body, with the exception of information which has been disclosed earlier in compliance with the requirements of the Russian securities market legislation;
53. contained in quarterly reports signed by Rosneft's authorized persons, with the exception of information which has been disclosed earlier in compliance with the requirements of the Russian securities market legislation;
54. contained in Rosneft's annual reports signed by Rosneft's authorized persons, with the exception of information which has been disclosed earlier in compliance with the requirements of the Russian securities market legislation;
55. on concluding by Rosneft of a strategic partnership contract or other contract not provided for by clauses 20, 21, 23, 30, 32, 37 of this List, if conclusion of such contracts can have a significant impact on the price of Rosneft's issue-grade securities;

56. on holding and agenda (on refusal to hold) the general meeting of holders of Rosneft bonds as well as on decisions taken by the general meeting of holders of Rosneft bonds, if there are observed the terms and conditions provided for by clause 1.1. or 1.2. of the Notes to this List;

57. on sending (submission) by Rosneft of a notice containing data on bond holders' representative, if there are observed the terms and conditions provided for by clause 1.1. or by clause 1.2. of the Notes to this List;

58 on taking by a court, commercial court, executive body conducting enforcement proceedings, of provisional measures in respect of monetary funds or other property belonging to Rosneft, its controlling organization, an organization controlled by Rosneft, which has significance for it, or to a person who has provided security on Rosneft's bonds, if in respect of the person who has provided such security and (or) of the bonds in respect of which it has been provided there are observed the terms and conditions provided for by clause 1.3. of the Note to this List, comprising 10 and more percent of the balance value of the said persons' assets as of the date of ending of the latest completed reporting period preceding taking the provisional measures;

59 on initiation of criminal proceedings (received by Rosneft from preliminary investigation authorities or inquiry bodies) in respect of a Rosneft Board member, Rosneft sole executive body, its controlling organization, an organization controlled by Rosneft, which has significance for it, or to a person who has provided security on Rosneft's bonds, if in respect of the person who has provided such security and (or) of the bonds in respect of which it has been provided there are observed the terms and conditions provided for by clause 1.3. of the Notes to this List.

Note:

1. Insider information of PJSC Rosneft includes:

1.1. information about the issue-grade securities placed by PJSC NK Rosneft, as provided by clauses 13 – 16, 50, 51, 56 and 57 of this List, in case if:

- *placement of Rosneft's issue-grade securities shall be effected in exchange trading;*
- *the placed Rosneft's issue-grade securities shall constitute an additional issue in respect of the issue-grade securities of the issue which have been allowed to exchange trading or in respect of which an application for clearance for exchange trading has been submitted;*

1.2. information on the placed (traded) Rosneft's issue-grade securities, provided for by subclauses 12, 18, 19, 23, 37, 41, 56 and 57 of this List, in case such issue-grade securities have been cleared for on-exchange trading or an application for clearance for on-exchange trading has been submitted in respect of the said issue-grade securities;

1.3. information on the person who has provided security for Rosneft's bonds as well as on the terms and conditions of such security, provided for by subclauses 7 - 11, 30, 33, 34, 36, 44, 58, 59 of this List, in case such issue-grade securities have been cleared for on-exchange trading or an application for clearance for on-exchange trading has been submitted in respect of the said issue-grade securities.

The information on the person who has provided security for Rosneft's bonds, provided for by subclauses 7 - 11, 30, 34, 59 of this List, shall not form part of Rosneft's insider information in case if such person is the Russian Federation who has provided a state guarantee of the Russian Federation, a constituent entity of the Russian Federation that has provided a state guarantee of a constituent entity of the Russian Federation, or a municipality that has provided a municipal guarantee for Rosneft's bonds.

2. Insider information of Rosneft does not include information and (or) data based thereon which are transferred to Rosneft and (or) by a person involved by it (persons involved by it) to potential acquirers or are used by Rosneft and (or) by a person involved by it (persons involved by it) for providing recommendations to or otherwise encouraging potential acquirers to purchase the relevant securities in connection to placement (organization of placement) and (or) offering (organization of offering) of Rosneft's issue-grade securities in the Russian Federation or beyond it, including by placement of a foreign issuer's securities certifying the rights to Rosneft's issue-grade securities, subject to notification of potential acquirers that such information (data) may be used by them solely for the purposes of taking a decision to purchase the placed (offered) securities.