

***Regulations on Information Policy  
of Public Joint Stock Company “Oil Company “LUKOIL”***

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## **1. General Provisions**

1.1. These *Regulations on Information Policy of Public Joint Stock Company “Oil Company “LUKOIL”* (hereinafter referred to as the “Information Policy”) have been developed in accordance with the effective legislation of the Russian Federation, the Code of Corporate Governance approved by the Board of Directors of the Bank of Russia on 21 March 2014, requirements of stock exchanges applicable to PJSC “LUKOIL” (hereinafter also referred to as the “Company”), as well as legislative acts in the sphere of financial markets.

## **2. Goals, Tasks and Principles of the Company’s Information Policy**

2.1. This Information Policy is designed to satisfy the demand of shareholders, investors and other stakeholders (hereinafter collectively referred to as the “Stakeholders”) for complete, relevant and reliable information on the Company’s activity.

2.2. This Information Policy of the Company aims at addressing the following tasks:

- provision of free and unencumbered access to information on the Company;
- protection of the Company data which, if disclosed and/or used, may harm its interests and adversely affect its competitive position;
- keeping of a reasonable balance of Stakeholders’ and the Company’s interests while providing information.

2.3. The Company abides by the following information disclosure principles:

- periodicity and consistency of disclosing updated information on the key areas of the Company’s activity;
- prompt disclosure of information on material events in the Company’s activity;
- assuring completeness and reliability of information which is disclosed on the Company and other LUKOIL Group organizations;
- equal access to information for identical categories of Stakeholders;
- ensuring coherence and consistency of information which is disclosed using different means and/or different forms, as well as a possibility of benchmarking indicators disclosed for different periods.

2.4. The Company refrains from applying a formalist approach while disclosing information on its activity.

2.5. The Company is committed to providing concerted and equivalent disclosure of material information in the Russian Federation and abroad.

2.6. This Information Policy is implemented by the Company’s executive bodies.

2.7. The Board of Directors of the Company controls proper disclosing of information and adherence to this Information Policy.

### **3. Means of Disclosing, Disseminating and Providing Information**

3.1. The Company discloses, disseminates and provides information as follows:

- information is disclosed in the news feed and on the Internet web-page of authorized disseminators of information at the securities market;
- information is posted to the Company's official websites [www.lukoil.ru](http://www.lukoil.ru) and [www.lukoil.com](http://www.lukoil.com);
- information is published in mass media (hereinafter referred to as "mass media");
- access to information and documents is granted to the Company's shareholders; copies of documents are provided thereto at their requests in cases envisaged by effective legislation, the Company's Charter and in-house regulatory documents;
- public speeches and presentations, interviews with the Company's representatives, phone and video conferencing sessions are organized;
- meetings with shareholders, investors and other representatives of investment and professional communities are held;
- conferences, seminars, presentations and other public events are organized and attended in Russia and abroad;
- other means that do not contradict the effective legislation.

### **4. Information Subject to Mandatory Disclosure**

4.1. The Company is guided by the requirements of the RF legislation in terms of mandatory disclosure of information, those of stock exchanges that are applicable to the Company and legislative acts in the sphere of financial markets.

In all cases the Company discloses the following information:

- the Company's annual report;
- annual financial (reporting) statements and the auditor's report thereon in which the opinion is expressed in the manner required, interim financial (reporting) statements;
- annual and interim IFRS consolidated financial statements;
- the Company Charter;
- internal documents governing functions and activity of the Company's bodies;
- quarterly issuer reports;
- notices of material facts in accordance with the requirements set out in legislative acts of the Russian Federation;
- information on affiliated parties;
- information to be disclosed at various stages of securities issue;
- information on holding the General Shareholder Meeting in the manner established by effective legislation;

- information submitted or provided by the Company to a relevant foreign body (organization), foreign stock exchange and/or other organizations in accordance with foreign laws for the purpose of disclosing or providing information to foreign investors in connection with placing or transacting in the Company's issuance securities outside the Russian Federation;
- list of insider information;
- prospectus in cases envisaged by legislative acts of the Russian Federation, securities issue (additional issue) resolution;
- other information subject to mandatory disclosure in accordance with the requirements of effective legislation and legislative acts in the sphere of financial markets.

4.2. The list of disclosures is subject to change in accordance with changes in the effective legislation, regulators' rules and requirements.

4.3. The information shall be disclosed in the volume, in accordance with the procedure and within the period stipulated by the effective Russian and applicable foreign countries' legislation governing the disclosures by issuers.

4.4. The information subject to mandatory disclosure pursuant to the Russian legislation shall be disclosed on web-pages provided by securities market information disseminators in Russia, on the Company's official websites [www.lukoil.ru](http://www.lukoil.ru), [www.lukoil.com](http://www.lukoil.com), or otherwise as provided for by the effective Russian legislation.

4.5. Information that must be disclosed in relation to the Company's securities business outside Russia shall be disclosed through an authorized news agency abroad. In the event of disclosure of any information outside Russia, the Company shall also disclose it in Russia in the volume, form, in accordance with the procedure and within the period stipulated by the Russian securities market regulator, including on the Company's official websites [www.lukoil.ru](http://www.lukoil.ru), [www.lukoil.com](http://www.lukoil.com).

## **5. Additional Disclosures**

5.1. To promote and maintain Stakeholders' trust in the Company and to enhance the value of its securities, the Company shall disclose the following information in addition to mandatory disclosures:

- its consolidated IFRS financial statements for Q1 and Q3;
- management's discussion and analysis of the Company's financial condition and results of operations (MD&A);
- key operating indicators;
- dividend policy;
- information (materials) provided when preparing for a General Shareholders' Meeting, in addition to mandatory disclosures;
- details of the composition of the Company's Board of Directors committees;
- details of the structure of the Company's equity capital;
- information on the Company's mission and history;

- sustainability report.
- 5.2. The principal method for disclosing the information set out in clause 5.1. hereof shall be its publication on the Company's official websites [www.lukoil.ru](http://www.lukoil.ru), [www.lukoil.com](http://www.lukoil.com).
- 5.3. In addition to the abovementioned information (materials), the Company may also provide other information if it can influence the value of the Company's securities.

## **6. Providing Access to the Information to the Company's Shareholders**

6.1. The Company shall provide its shareholders with access to documents set out by the effective legislation, the Company's Charter and in-house regulatory documents. The documents may be provided to the Company's shareholders upon their request through giving them access to the documents at the location of the Company's executive body: 11 Sretensky Bulvar, Moscow, Russian Federation, 101000, and/or through providing copies of the documents to them. The procedure for giving access to the documents and providing their copies is stipulated by the *Regulations on Provision of Information to Shareholders of PJSC "LUKOIL"*.

6.2. A notice of a General Shareholders' Meeting of the Company and information (materials) for the General Shareholders' Meeting shall be provided to the shareholders as stipulated by the effective legislation, the Company's Charter and the *Regulations on the Procedure for Preparing and Holding the General Shareholders Meeting of PJSC "LUKOIL"*.

## **7. Confidential and Insider Information**

7.1. The Company shall take measures to protect information constituting a state, commercial, business or other secret protected by law in accordance with the procedure stipulated by the effective legislation.

7.2. Legal relations associated with the access to the Company's insider information shall be governed by the *Regulations on Insider Information of PJSC "LUKOIL"* approved by the Company's Board of Directors.

7.3. The Company's documents that comprise information constituting a state, commercial secret, personal data or other secret protected by law shall be provided in the cases and in accordance with the procedure stipulated by the effective financial market legislation and regulations, as well as the Company's internal regulations.

## **8. Final Provisions**

8.1. This Information Policy, as well as changes and additions hereto, shall take effect from the date of approval by the Company's Board of Directors.

8.2. If certain provisions of the Information Policy become in conflict with the Russian financial market legislation and regulations, or stock exchanges' requirements as a result of changes thereto, the respective provisions of the Russian financial market legislation and regulations, or stock exchanges' requirements shall be applied.