

Should any violations of the Corporate Code of Conduct be identified by employees, the Committee may order the following disciplinary actions:

- recommending relevant corporate bodies and the employee's supervisor to take the matter into account when performing an annual performance evaluation;
- recommending relevant corporate bodies and the employee's senior to take the matter into account when deciding on promotions, changes to compensation or inclusion in or exclusion from a talent pool;
- recommending the HR function and the employee's senior to take disciplinary action against the employee in accordance with applicable labour law and company standards;
- escalating the matter to the Chairman of the Management Board or an executive meeting;
- discussing the matter with the employee;
- ordering extra training on specific areas of the corporate rules of behaviour; and
- recommending that the individual is restricted from representing the company in the governance and control bodies of its subsidiaries and other organisations, the media as well as official, business and public events.

Anti-corruption

The company has zero tolerance for any form of corruption, including extortion and bribery.

Gazprom Neft has approved a publicly available Anti-Fraud and Anti-Corruption Policy. This Policy defines the concept of fraud and other terminology, and shapes the approach of the company's senior management, who have put in place a single and cohesive ethical standard for zero-tolerance for any type or form of corruption. The Policy lists the key principles of combatting fraud and corruption, as well as the methods and procedures used by the company, in particular, the company hotline, internal investigations, and prosecution of identified fraud cases.

The Policy contains a section setting out the basis for implementing those of the company's business processes that are most exposed to fraud risks, including interaction with officials, receiving and giving gifts, charitable and sponsorship activities, and financial affairs with third parties.

The Anti-Fraud and Anti-Corruption Policy includes training for company employees in the zero-tolerance approach to fraud and covers the underlying applicable legislation.

The following courses have been developed and are used in the corporate training system: Preventing and Combating Corporate Corruption; Corruption Prevention; Combating Corruption and Fraud. These courses are mandatory for all employees newly hired by the company.

KEY TYPES OF MATTERS REPORTED:

- relations among employees and between employees and their seniors;
- interpersonal communication etiquette;
- relatives working together;
- unfair bonus allocation.

 Gazprom Neft at a glance

 Sustainable development management

 Customer care

 Health and safety

 Environmental safety

 Employee development

 Social policy

 Appendices

The Deputy CEO for Security reports regularly to company management on anti-fraud and anti-corruption issues. The Director of the Internal Audit and Risk Management Directorate regularly reports to the Board of Directors on the hotline's performance

Investigations into reports received via the company hotline in 2020 revealed no instances of corruption¹

+ For more details on the operation of the hotline, see "Respect for human rights" on page 36

¹ – Applicable Russian laws stipulate that investigations into corruption be conducted by law enforcement agencies. Therefore, if any evidence of corruption is found, the relevant materials must be handed over to law enforcement agencies. The investigation of reports received via the company hotline in 2020 showed no need to contact law enforcement agencies.