

**Opinion of the RUIE Non-financial Reporting Board based on a Review
of the Sustainability Report for 2014 by JSC Gazprom Neft
for purposes of Public Certification**

The Non-financial Reporting Board (“the Board”) of the Russian Union of Industrialists and Entrepreneurs (“the RUIE”), established by resolution of the Bureau of the Board (Resolution dated June 28, 2007), has, on the initiative of the Company JSC Gazprom Neft (“Gazprom Neft”), reviewed the Sustainability Report of that Company for 2014 (“the Report”).

The Company requested the RUIE to carry out public certification of the Report by the offices of the Board. The Board reached its opinion on the completeness and relevance of the information on the Company's business presented in the Report from the viewpoint of the Social Charter of Russian Business, which sets out principles for responsible business practices.

The members of the Board examined the contents of the Report submitted by the Company in the period from May 8 to May 25, 2013 and prepared this Opinion in accordance with the RUIE's approved Regulations on the Public Certification of Corporate Non-financial Reports. The Board members have the required expertise in the sphere of corporate responsibility, sustainable development and non-financial reporting; their assessment complies with the ethical requirements of independence and objectivity, and they express their personal expert opinion rather than the opinion of the organizations represented by them.

The Report was evaluated based on the following criteria for the completeness and relevance of the information contained in it:

Information is considered relevant to the extent that it reflects the Company's actions to implement the principles of responsible business practice that are set out in the Social Charter of Russian Business (www.rspp.ru).

Completeness implies that the Company presents its business in the Report comprehensively, encompassing underlying business values and strategic guidelines, management systems and structures, achievements and key performance indicators, and its system of interaction with stakeholders.

The Company's use of international reporting systems is taken into account as part of the public certification of the Report. However, confirmation of the level of the Report's compliance with international reporting systems is beyond the scope of this Opinion.

The Company is responsible for the information and statements contained in the Report. The public certification does not attempt to ascertain the reliability of factual data contained in the Report.

This Opinion has been prepared for Gazprom Neft. The Company may use this Opinion both for internal purposes and for communication with stakeholders, publishing it without any alterations.

FINDINGS

Based on the analysis of the Report as well as public information posted on the Company's official corporate website and collective discussion of the results of independent evaluation of the Report by the members of the RUIE Non-financial Reporting Board, the Board confirms the following:

The Sustainability Report of JSC Gazprom Neft for 2014 contains relevant information on key areas of responsible business practice in accordance with the principles of the Social Charter of Russian Business, and discloses information about the Company's business with sufficient completeness.

Recommendations of the Board arising from the public certification of the previous Report of Gazprom Neft for 2013 have been reflected in the Report for 2014. In particular, key performance indicators are more closely related to the Company's goals and business objectives, information on energy consumption is expanded, practice of interaction with stakeholders in the preparation of the Report is described, and issues of the environmental safety of oil production in the Arctic are examined.

The Report for 2014 contains important information on the following aspects of responsible business practice:

Economic Freedom and Responsibility: The Report contains detailed information on the Company's operating and financial results over a five-year period, significant developments related to implementation of the Company's strategy, such as bringing crude oil produced on the Arctic shelf to the world market, increasing oil recovery from mature wells in Siberia by the use of new technologies, and the completion of restructuring of several major assets. The Report shows the contribution of achievements in 2014 by main operating divisions to the implementation of strategic goals and business tasks, including the expansion of gas production through the commercialization of associated and natural gas reserves at oil fields. Considerable attention is paid to the Company's innovation activities as a factor that favours sustainability of the business in the context of the overall objectives of sustainable development. The Report provides information on the expansion of import-substitution through production by the Company of high-quality petroleum products and petrochemicals, as well as the potential for further expansion of support to domestic companies, which act as suppliers to the Company. Plans are presented for hydrocarbon production, refining and marketing of petroleum products, improvement of quality, and the development and modernization of production. Information is included on matters of corporate governance and risk management, the system and structure of management by business segments, the implementation of international standards in this sphere, as well as current corporate policies and standards governing responsible business practice. It is stated that the Company makes the principles of sustainable development and social responsibility an integral part of its business strategy.

Partnership in business: The Report describes the principles and main forms of interaction with stakeholders and key groups of stakeholders are identified. The corporate documents, which regulate interaction processes and the observance of business ethics (including the prevention of corruption), are indicated. Information is provided on mechanisms to protect the

interests of shareholders and on work with investors. Aspects of the Company's work with suppliers are described, including responsibility in respect of the supply chain, where special attention is paid to compliance by suppliers with the Company's own environment, health and safety standards. Information is provided on interaction with consumers, with emphasis on reliability of deliveries, building long-term relationships and improving the quality of products and services. The Report describes regular conduct of customer satisfaction surveys and other mechanisms that take account of the interests of consumers. Much attention is paid in the Report to work with personnel and the system of internal communications. A large number of indicators concerning labour relations are presented, information is given about social programmes for employees and about incentive, training and development programmes, as well as work to prepare future managers, and work with young employees, trade unions, etc. Attention is given to issues of corporate culture. Cooperation with government to foster socio-economic development in Russian regions and for development of the country's fuel and energy industry is described. Information is provided on the Company's cooperation with scientific and research organizations (particularly in the field of innovation and training) and also with NGOs and local communities on social and environmental issues, and to support entrepreneurship. The Report contains information on work with stakeholders for preparation of the Report itself, on matters discussed in dialogues with stakeholders, and on the Company's response to proposals made.

Human rights: The Report states that the Company declares human rights in its corporate documents and observes them in its business activities, primarily in the spheres of employment, labour relations, working conditions and health and safety, professional development, and social protection of employees. The information given in the Report also entails that the Company strives to take account of the interests and respect the rights of consumers and of local communities, including indigenous northern peoples living in regions where the Company has operations.

Protecting the environment: The Report states that the reduction of negative impact on the environment, together with industrial and environmental safety are objectives of strategic importance to the Company, and their achievement is built into corporate policy. Work is continuing to implement international standards at Company enterprises and on certification of the relevant management systems. The Report describes the application of technologies to make production processes safer and more environmentally friendly. Trends of environmental impact indicators are presented (pollutant emissions, water consumption, waste management, reclamation of disturbed and contaminated land), as is information on work to reduce emissions of greenhouse gases and on utilization of associated gas. The Report provides information on advances in the field of energy saving and energy efficiency. The results of environmental activities are presented by quantitative indicators, which are given in comparison with previous periods, and future challenges are designated, including targets for 2015. Updates are given on projects that are being implemented in partnership with environmental organizations and on interaction with society in this sphere.

Participation in local community development: The Report describes the Company's regional policy and its governance structure in this sphere. Information is given on the impact of Gazprom Neft on regional economies. Account is given of the Company's social and economic cooperation agreements with regional and municipal administrations. The Report highlights the "Hometowns" programme, which includes a variety of social projects and is the Company's main social investment programme. Grant competitions and participation by Company employees in volunteer activities are also highlighted. Company spending on

corporate charity is detailed. Future plans in the social sphere in regions where the Company is active are described.

Conclusion

In general, the information included in the Report reflects consistent work by the Company to implement the principles of corporate responsibility and sustainable development in its business practice. The Report contains information on the impact of Company business on society and the environment, including economic, environmental and social aspects. Interaction with stakeholders, including interaction during the preparation of the report, is described in the context of sustainable development. The report contains a significant number of performance indicators.

The Report was prepared using recommendations of the GRI Guidelines, as applicable to Russian and international accounting practice, which ensures comparability with the reports of other companies. It should be noted that the Report was prepared using the new GRI-G4, which accords more attention to the definition of core themes. The provisions of the international standard ISO 26000: 2010 (Guidance on Social Responsibility) were also taken into account in determining the content of the Report. This international standard is consistent with the provisions of the Social Charter of Russian Business.

The Report is well structured and its strengths include a large number of opinions of stakeholders, which illustrate and confirm various aspects of the information that is provided concerning the business of Gazprom Neft. The Report demonstrates consistency and progress in development of the reporting process at the Company.

The Sustainable Development Report of JSC Gazprom Neft for 2014 is the eighth such report by the Company. It confirms consistency and progress in the development of sustainability reporting, and a responsible attitude by the Company in respect of its obligations to improve transparency.

RECOMMENDATIONS

While noting the strengths of the Report, the Board draws the attention of the Company to a number of significant issues for stakeholders regarding the relevance and completeness of the information, which is disclosed, and recommends that they should be taken into account in the Company's reporting practice in the future.

The Board notes that the recommendations made on the basis of analysis of the previous Report for 2013 can also be used in the Company's future reporting practice.

In order to achieve greater completeness and clarity, it is recommended that details of Company operating results should be presented in the context of an analysis of the overall economic situation in the reporting period and its impact on the oil industry, since this may be associated with new current and future challenges and risks for the Company. The inclusion in the Report of such analysis and related commentary would be particularly appropriate in view of the geopolitical and economic situation in 2014. In the next reporting cycle it would be

advisable to give more attention to the context, i.e. to assessment of the prevailing business environment and its potential impact on the future achievement of the Company's plans.

More attention should be paid in the Report to the theme of risk management, particularly in view of current increase of economic and geopolitical risks. Readers are legitimately referred to the Company's annual report as a source of more detailed information, but it would be advisable to present a risk map in the Sustainability Report, as the range of risks related to sustainability goes beyond the data presented in the Report. This is particularly true to the extent that the nature of some of these risks has changed.

The format for presentation of results could be diversified by including not only systematic data on the Company as a whole, but also for key enterprises, and not only not only for operating divisions, but also in cross-section by regions. This would enable a more complete understanding of progress made, problem areas and growth points. In particular, taking account of the importance of issues of environmental and industrial safety for regions where the Company has large enterprises, it would be appropriate to give more complete and generalized information about their impact in these regions, instead of limiting such information to specific examples. It would also be helpful, in various instances, to include a comparison of results achieved with the scale of the problems addressed (an example would be a comparison of the area of reclaimed land with the area of land that has been disturbed by industrial activities).

The Report contains plans for the future, which is clearly positive, but these plans are not always expressed in measurable quantitative indicators, which reduces their value for information purposes. It is recommended that, in the future, the greatest possible use should be made of measurable target indicators when describing the Company's plans. It should also be noted that the inclusion of comparisons between targets and their actual achievement enhances understanding of Company performance in the reporting year. The latest Report includes such comparisons in some instances and it is recommended that they should be presented more consistently in the future.

The Report pays sufficient attention to description of the Company's corporate governance system and the organization of operational management in the sphere of sustainable development. In addition to this information it would be desirable to provide a scheme showing the layout of sustainable development management at the Company, as this would aid comprehension and ensure completeness of the description.

It is recommended that future reports should include more data on how the selection of key issues for disclosure in the report is made and what procedures are used for this purpose. This is all the more important since the Company has begun to use the new GRI Guidelines (G-4) for preparation of the Report, and G-4 highlights this issue.

It is recommended that more attention be paid to social dialogue in regions of presence by making the preparation of the Report an agenda item for meetings as part of such dialogue, so that issues raised by stakeholders, including problematic issues, find a place in future reports.

When determining significant issues to be addressed by the Report, particular attention should be paid to events in the life of the Company, which had public resonance during the reporting

period, and particularly to events which caused negative public resonance (for example, the incident involving harmful emissions from the Moscow Refinery). It is also recommend that the Company's response to such feedback from society should be described, since this would help to ensure that information is balanced. The omission from the Report of information about issues concerning the Company, which have provoked discussion in society, may cast doubt on the completeness of the analysis and the extent to which views of the external community have been taken into account in determining the content of the Report, and may suggest that the Company wishes to avoid difficult issues. A more balanced presentation of the material will enhance confidence in the reliability of the information, which is provided.

Information in the report on the Company's interaction with partners in the supply chain could be supplemented by specific indicators for monitoring and supervision of their compliance with principles and standards of social responsibility, as well as examples of action taken when those standards are breached.

The RUIE Board for Non-Financial Reporting gives a positive assessment of the Report and applauds the commitment of Gazprom Neft to the principles of responsible business practices and, noting consistent development of the reporting process, confirms that the Report of Gazprom Neft on Sustainable Development in 2014 has successfully passed its Public Certification.

Chairperson of the RUIE Board
for Non-financial Reporting

F.T. Prokopov

Deputy Chairperson of the RUIE Board
for Non-financial Reporting

E.N. Feoktistova