

APPROVED

(POSITION)

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(NAME)

« ____ » _____ 2014 г.



ОТКРЫТОЕ АКЦИОНЕРНОЕ ОБЩЕСТВО «ГАЗПРОМ НЕФТЬ»
(ОАО «ГАЗПРОМ НЕФТЬ»)

Policy on industrial and workplace health, safety and environmental protection; fire and transport safety; and civil defense

Policy information

- 1 DEVELOPED by the Health, Safety and Environment Department
- 2 PROCESS OWNER: Head of Health, Safety and Environment Department
- 3 VERSION 2.0, REPLACING PK-16.00-01 JSC Gazprom Neft Policy on Health, Safety, and Environmental Protection, version 2.0, approved March 27th, 2008, under Order No. 32-P.

Introduction

JSC Gazprom Neft conducts its activities in compliance with government policy on industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense, consistent with corporate and international standards.

This document (“the Policy”) summarizes and represents all internal regulation pertaining to JSC Gazprom Neft (“the Company”), its subsidiaries and affiliates, with regard to industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense. It determines the functioning and improvement of the Company’s management of industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense, and is fully compliant with international standards OHSAS 18001:2007 and ISO 14001:2004, as well as with current regulation of the Russian Federation.

The provisions of this Policy are subject to revision consistent with amendments to regulation, to corporate policies of the Gazprom Neft Group, or to revisions to Gazprom Neft

Group development strategy.

1 Scope

1.1 This Policy defines the collective objectives and responsibilities of JSC Gazprom Neft pertaining to industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense.

1.2 This Policy is binding upon all of the Company's subsidiaries and affiliates.

1.3 The terms, definitions and abbreviations used in this Policy are explained in Attachment 1.

2 Policy objectives

2.1 The Company's strategic objective on industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense is to:

occupy a leading position among the world's oil and gas companies with regard to ensuring industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense, confirmed by concrete evidence and the application of industry best practice.

2.2 Objectives in the area of industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense include the following.

2.2.1 The continuous reduction of workplace injuries, occupational disease, accidents, and negative environmental impacts.

2.2.2 The implementation of safe working practices based on industrial risk analysis to ensure minimal impacts.

2.2.3 The continuous implementation of international best practice in industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense.

2.3 The Company's responsibilities in respect of industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense include the following.

2.3.1 The creation of a workplace environment (including creating conditions conducive to motivation and engagement) in which every JSC Gazprom Neft employee is aware of and assumes personal responsibility for his or her own safety and that of his or her colleagues and/or associates; and in which every employee has the right to terminate and/or to refuse to perform any activity that might threaten his or her own life and/or health, or the life and/or health of his or her colleagues and/or associates.

2.3.2 The implementation and continuous improvement of an effective system for the management of industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense, consistent with national and international standards.

2.3.3 The fulfilment of the Company's activities and operations consistent with current

regulation on industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense, as well as compliance with industry and corporate standards and regulations, while taking every available opportunity to reduce risk, beyond statutory requirements.

2.3.4 The continuous implementation of all available preventive measures to reduce the probability of incidents to a viable level, based on an appreciation that all production and commercial activities planned or undertaken JSC Gazprom Neft and its subsidiaries and affiliates carry an inherent risk.

2.3.5 The continuous improvement of employees' knowledge of, competency in, and awareness of issues pertaining to industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense, through various forms of instruction and coaching.

2.3.6 The continuous improvement of working conditions and industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense, and continued improvement in the monitoring of these.

2.3.7 The participation of all JSC Gazprom Neft employees in the identification and management of industrial risks.

2.3.8 The implementation of cutting-edge science and technology throughout Company production sites with the aim of reducing danger and risk to employees' lives and health, as well as reducing negative environmental impacts and risks to the public.

2.3.9 The provision of all resources necessary for the effective implementation of this Policy.

2.3.10 The introduction of management strategies with regard to JSC Gazprom Neft counterparties and business partners to ensure their compliance with the Policy in the fulfilment of all activities at JSC Gazprom Neft enterprises and production sites.

2.3.11 Ensuring full transparency and accessibility to all data on industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense, through the appropriate exchange of information and effective dialogue with all stakeholders.

2.3.12 The timely implementation of this Policy and the communication of its requirements to all employees of JSC Gazprom Neft, its subsidiaries and affiliates, its counterparties and business partners, and all other stakeholders.

3 Policy implementation: key principles

3.1 The management of JSC Gazprom Neft is fully aware of its responsibilities in protecting the health of employees of the Gazprom Neft Group and its subsidiaries, of its responsibilities towards residents in those areas in which the Company is active, and of its responsibility to ensure safe industrial working conditions, with no adverse environmental impacts.

3.2 Considerations of an economic, technical, or other nature may not be taken into account where these contradict the interests of workplace safety, public safety, or the environment.

3.3 The management of JSC Gazprom Neft regards industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense as integral to effective production management, and acknowledges its responsibilities with regard to the effective management of all risks pertaining to the lives and health of its employees, and to equipment and facilities, property, and the environment.

4 Stakeholders

4.1 Interested parties (“stakeholders”) in the fulfilment of this Policy are deemed to include shareholders and potential investors, managers and employees of the Company and its subsidiaries and affiliates, and counterparties and business partners responsible for ensuring compliance with the terms of this Policy, supported by specialists in industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense.

4.2 The establishment of an effective management system for industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense has a direct influence on the corporate culture, economic efficiency and value of the Company and its subsidiaries and affiliates, as well as on its relations with counterparties.

5 Policy implementation: documentary and information support

5.1 Implementation of this Policy is predicated on the basis of applicable regulation governing industrial and workplace health, safety and environmental protection, fire and transport safety, and civil defense.

Attachment 1

Terms and abbreviations

The following terms and abbreviations are used in this Policy:

Gazprom Neft Group: the Company and its subsidiaries and affiliates. In the context of this Policy, this term is applied both to all legal entities within the Gazprom Neft Group, and to each legal entity individually.

Subsidiaries and affiliates: subsidiaries and affiliates of JSC Gazprom Neft.

Company: Joint Stock Company Gazprom Neft (JSC Gazprom Neft).

Counterparties: legal entities and/or individuals (excluding connected parties) engaging with the Company and its subsidiaries and affiliates on the basis of a civil contract, and legal entities and/or individuals engaged in any pre-contractual discussions or relationship with the Company and its subsidiaries and affiliates.