

	Procedure for Risk Management of the GAZPROM INTERNATIONAL LIMITED ILLC Group Companies	Reg. No.	190
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Verified on behalf of the QMSD by E.V. Iushmanova, Deputy Head of QMSD	Approved by Order of GAZPROM INTERNATIONAL LIMITED ILLC	Order №03-kr	
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1. Scope of Application

This document establishes the procedure for risk management in the organization The Procedure applies to all the Gazprom International Limited ILLC Group Companies.

2. Terms and Abbreviations

2.1 Terms and Definitions

	An investment asset that represents the following:
Oil and Gas Asset (Asset)	a) a participation interest of a Group Company in a contract, agreement, subsoil license, or several interrelated contracts, agreements, subsoil licenses; b) a participation interest of a Group Company in the equity or authorized capital of an oil and gas investment project, which the Company expects to generate economic or other benefits in the future.
Information Asset	Equipment, services, software, personal data, information constituting a trade secret (as applied to the ISMS).
Qualitative Risk Assessment	A process of identifying the priorities in developing risk response measures through assessing (scoring) risk likelihood and its possible effect, as well as other aspects.
Key Risk Indicator	A quantitative indicator used for early warning on changes in the risk level.
Quantitative Risk Assessment	The process of calculating risk materiality in monetary terms subject to potential workload on digitalizing risks, requirements for risk analysis efficiency and expeditiousness, etc. Quantitative assessment is performed based on the model of assessing the effect of risks on the financial and economic performance of an organization/project.
IMS Committee	A consultative and advisory body that focuses on reporting key important information on current IMS performance to the Company's executives and drafting effective solutions ensuring the IMS continuous improvement.
Group Companies (Group of Companies)	The Company and its subsidiaries, partially or fully, directly or indirectly, controlled by the Company, and their separate divisions (branch offices, representative offices and project offices). For the purposes of this definition, "control" means holding, directly or indirectly, of more than fifty percent of total interest.
Company	International Limited Liability Company GAZPROM INTERNATIONAL LIMITED.
Operator	A separate legal entity (including a branch office) authorized to conduct operations related to an Asset, including the engagement of contractors (service companies), under oil and gas agreements and/or on behalf of the parties to a joint operating agreement or a similar agreement. A legal entity or a structural unit of a legal entity authorized to organize and manage production processes (create capital construction facilities and operate them), including engagement of contractors (service companies), on behalf of the parties to a joint operation agreement (or a similar agreement), and accountable to the Joint Asset Management Bodies. The Operator may be established in partnership with other partners as a joint venture (including without establishing a legal entity).
Risk Criterion (as applied to the ISMS)	A combination of factors against which risk significance is benchmarked (maximum permissible level of IS risk).



Project Sponsor	An employee from among the Company's top management who is the interested consumer of the project outcomes.
Risk Matrix	A graphic representation of risks in the form of a 2D coordinate system where the Y-axis shows the likelihood of risk occurrence, and the X-axis shows the risk materiality.
Top Risk Matrix	A risk matrix that shows the Group-Level risks of High, Very High, and Critical significance.
Residual Risk	An identified risk remaining inherent to the activities of the Company provided that response measures and/or risk treatment controls are implemented.
Person Responsible for Monitoring	An employee of the Group Companies responsible for monitoring the risk level and risk occurrences, correct and timely implementation of risk management measures in accordance with the agreed plans, and monitoring the measures efficiency, and also responsible for providing information on the results of risk monitoring and risk management measures.
Person Responsible for a Group-Level Risk Cluster	An employee (usually the Head) of a Group Company appointed by an order, who is responsible for the risk management within the relevant risk cluster.
Person Responsible for a Group-Level Risk	An employee (usually the Head) of a Group Company appointed by an order, who is responsible for coordinating and monitoring the works at all the life cycle stages of the Group-Level Risk(s).
Person Responsible for SA Risks	An employee of a Group Company responsible for managing specific risk(s) of SA-level.
Maximum Permissible Risk Level	The level of risk significance resulting from assessment, at which the measures, such as risk reduction measures, are required and the information on the risk goes a level up for subsequent analysis (for example, from the Operator level to the Asset level, from the Asset level to the SA/Group level).
Project (Project Activities)	A set of interrelated measures with a common purpose aimed at creating a unique product or service subject to time and resource constraints. For the purposes hereof, projects mean all internal projects other than Oil & Gas Asset management projects.
Risk Register	<p>A list of up-to-date risks (Group of Companies/Functional Area/Operator/Asset/Project/SA level) with indication of required attributes in accordance with the Risk Register template, including: risk No., risk name, risk classification, risk causes and consequences, Person Responsible for the Risk, results of qualitative and quantitative assessment, risk management method and measures.</p> <p>An effect of uncertainty on objectives. Where:</p> <ul style="list-style-type: none">• effect is a deviation from what is expected (positive and / or negative);• uncertainty is a state of lack of information, understanding or knowledge about an event, its consequences or its opportunity;• the objectives may have different aspects (for example, financial and ecological objectives, and health and safety objectives) and may be applied at different levels (Group of Companies, Asset, Project, Subsidiary level).
Risk	
Project Manager	An employee of a Group Company responsible for the implementation of one or several ongoing projects and the achievement of their objectives within the deadlines and budget.
Asset Acquisition Project Manager	An employee of a Group Company responsible for planning, organizing, coordinating and monitoring the assessment activities on prospective Asset acquisition, who performs, within the powers conferred upon him/her, the function of a single responsible person in relation to the prospective Asset at the assessment and acquisition phases,

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Joint Management for the Asset **Advisory Bodies** Committees, subcommittees, councils and other working bodies established by the parties to the oil and gas agreement within the asset management activities.

An employee of a Group Company responsible for planning, organizing, coordinating, and monitoring activities to achieve the goals of an Oil and Gas Asset within the powers conferred upon him/her.

Asset Manager Note: The Asset Manager is vested with the above mentioned powers when transiting to the Asset development phase after the completion of the asset acquisition project. However, at earlier life cycle phases, a potential candidate for the role of Asset Manager is engaged in the preparation and consummating the asset acquisition transaction (as a member of the project team).

Supervisory Body for SA A body of a Group Company that supervises the SA activities.

SA Manager A head of a Subsidiary or an Affiliate of a Group Company.

2.2 Abbreviations

SA	Subsidiary or Affiliate
PS	Project Sponsor
STC	Science and Technology Council
IAD	Internal Audit Division
PRSA	Person Responsible for a SA Risk
PRR	Person Responsible for a Group-Level Risk
HSE	Health, Safety, and Environment
QMSD	Quality Management System Division
PM	Project Manager
AAPM	Asset Acquisition Project Manager
FM	Functional Manager
Group-Level Risk	Group-Level Risk
JAMBA	Joint Advisory Management Bodies for the Asset
ISMS	Information Security Management System
RMS	Risk Management System
AM	Asset Manager
ITD	IT Department
CSD	Corporate Security Department
SB for SA	Supervisory Body for SA / Branch Office / Representative Office
SAM	Manager of SA / Branch Office / Representative Office
RM	Risk Management

3. References

Document Code	Title
ISO 9000:2015	Quality management systems — Fundamentals and vocabulary
ISO 9001:2015	Quality management systems — Requirements
ISO 31000:2018	Risk management — Guidelines
GOST R ISO 31000:2019	Risk management — Guidelines
ISO/IEC 27000:2021	ISO/IEC 27000:2018 Information technology — Security techniques — Information security management systems — Overview and vocabulary
GOST R ISO/IEC 27000-2021	Information Technology — Security techniques — Information security management systems — Overview and vocabulary
ISO/IEC 27005:2018	ISO/IEC 27005:2018 Information technology — Security techniques — Information security management systems — Information security risk management

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GI/C.01.00000-01 GI/L.04.M0502-01 GI/L.04.M0504-01 GI/C.04.C0306-01 GI/C.02.M0400-01 GI/C.06.M0400-01	Guidelines for the Integrated Management System Procedure for Internal Audit of the IMS Procedure for Corrective Actions Management Procedure for Management of Inconsistent Project Outcomes Policy on Risk Management Methodology on Risk Management of the Group Companies Policy on Risk Management and Internal Control of PJSC Gazprom approved by Resolution of the Board of Directors of PJSC Gazprom No. 3195 dated 25.12.2018 Regulations on the Operational Risks Management System of Gazprom Group approved by Order of PJSC Gazprom No. 291 dated 11.07.2019 Regulations on Liquidity Risk Management of Gazprom Group approved by Order of PJSC Gazprom No. 390 dated 10.07.2018 Regulations on Foreign Exchange Risk Management of Gazprom Group approved by Order of PJSC Gazprom No. 390 dated 10.07.2018 Regulations on Interest Rate Risk Management of Gazprom Group approved by Order of PJSC Gazprom No. 390 dated 10.07.2018 Regulations on the Credit Risk Management System of PJSC Gazprom, its Subsidiaries and Affiliates approved by Order of PJSC Gazprom No. 687 dated 03.11.2016 Risk Classifier of PJSC Gazprom, its subsidiaries and affiliates approved by Order of PJSC Gazprom No. 848 dated 15 December 2017 Guidelines for Self-Evaluation of Risk Management System Effectiveness of an Organization of Gazprom Group approved by Order of PJSC Gazprom No. 164 dated 8 May 2020 Guidelines for Key Risk Indicator Development approved by Order of PJSC Gazprom No. 168 dated 13 May 2020 Guidelines for Providing the Top Management of Organizations of Gazprom Group with the Results of Risk Management approved by Order of PJSC Gazprom No. 176 dated 19 May 2020 Guidelines for Risk Management based on Qualitative Assessments approved by Order of PJSC Gazprom No. 394 dated 28 May 2017 Guidelines for Quantitative Risk Assessment using the method of historical simulation VaR approved by Order of PJSC Gazprom No. 658 dated 20 December 2021
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4. Person Responsible for the Process

The unit responsible for the risk management process is the Quality Management System Division. GI/C.01.0000-01 (IMS Guidelines) defines the functional duties of the person/unit responsible for the process.

5. Responsibilities of the Process Participants

Participant	Area of Responsibility
Operator / AM / JAMBA / AAPM / SAM / PRSA / PRR / FM	Risk planning, identification, analysis, assessment, budgeting, response, monitoring and documenting within the corresponding functional area.
IMS Committee	Consideration of documents and materials related to project and corporate risk management, preparation of recommendations for the General Director, monitoring of the RM development.
Project Sponsor	Ratification of materials on project risks and approval of materials on project Group-Level Risks.
Internal Audit Division	Independent and unbiased assessment of the RMS reliability and efficiency, assistance in developing the RMS improvement procedures and measures, monitoring of the RMS improvement measures implementation, identification of risks within the conducted audits,

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	provision of advice on risk management issues to the General Director of the Company and to the Group Companies Management.
QMSD	Methodological support, organization and maintenance of the risk management process in the current mode, consolidation of information on the risks, RM training of the employees.
ITD	Methodological support, organization and maintenance of the risk management process in the current mode, consolidation of information on risks, RM training of the employees as applied to the ISMS.
General Director	Approval of the Risk Reports, supervision of risk management measures implementation, development of recommendations and instructions related to the risk management, including those related to a specific risks of the Group of Companies.
Company's Employee	Identification of potential risks.
Prospective Asset Manager	Preparation of materials on the risks of a prospective asset.
Persons responsible for monitoring	Monitoring of risk level, monitoring of risk occurrence, monitoring of measures implementation and efficiency.
Supervisory Body for SA	Ratification of materials on SA Risks and approval of materials on the Group-Level SA Risks.

6. Process Purpose and Performance Criteria

6.1 Purpose

The purpose of the risk management process consists in a comprehensive analysis of the effect of uncertainty on objectives for the purposes of creation and protection of the Company's value.

6.2 Performance Criteria

- Availability of an approved methodology for RM.
- Updating the risk related documents in line with planned measures (documented risks and measures, Risk Matrices and Occurred Risk Database).
- Timely monitoring of risks and risk related measures.
- Timely preparation of current and consolidated reports on risks for external and internal users.
- RM process performance evaluation.
- Availability of approved plans of the RM process development.
- Improvement of the results of the RMS self-evaluations.

6.3 Process Metrics

No.	Metrics, units	Calculation recommendations
1	Availability of an approved methodology for RM	If an approved methodology for RM is available or not.
2	Amount of loss (in MM USD) caused by the occurred risks that have not been previously identified, and an amount of costs for risk management measures (in MM USD), the risks the impact of which on the project / Group of Companies goals is considered as critical.	Shall be determined upon the record of non-identified risks occurrence during a year.
3	Appointment of the persons responsible for the risks of all the levels	The Person Responsible for the Risk is specified in the Risk Register.
4	Implementation of the RM process development plans	If the approved plans and their implementation monitoring are available or not.
5	Implementation of risk management measures in accordance with the plan specified in the Risk Register.	The planned start and end dates of the risk management measures shall be specified in the Risk Register (Measures sheet), and then, in a separate column, shall be specified the status of a measure at the monitoring stage.

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7. Inputs and Outputs

7.1 Process Inputs

No.	Input name	Supplier
1	Company's development goals and directions	M01.01 Strategic Planning
2	Approved Maximum Permissible Risk Levels	M01.01 Strategic Planning S06 Financial Services
3	Company's Internal Normative Documents on RM	M04 Risks and Compliance
4	External requirements to the Company's RMS	M05.03 Stakeholder Satisfaction Analysis
5	Proposals on RMS improvement and development	All the processes
6	Existing Risk Registers	M04 Risks and Compliance
7	Information on changes in the external environment and factors	M01 Strategic Management
8	Information on new risks and factors provided by the Employees of a Group Company employees	
9	Information on the current status and new project risks (data for Risk Register update)	C01 Investment Opportunity Identification C02 Asset Acquisition C03 Asset Development and Monitoring of Operator's Activities C04 Asset Work Program Implementation
10	Project feasibility study results	C02 Asset Acquisition
11	Development of the project Work Plan and Budget	C03.01 Development and Adjustment of Asset Management Plans
12	Internal report on the implementation of the Work Program and Budget (expert review of the project implementation and budget fulfillment during transition between the stages)	C03.03 Monitoring of the asset plans
13	Reports on the internal IMS audit including proposals on identified risks to be considered and included in the Registers	M05.02 Internal Audit
14	Calculations with substantiation of the quantitative risk assessment	S06 Financial Services

7.2 Process Outputs

No.	Output name	Consumer
1	Group-Level Risks Registers and Matrices	C03.01 Development and Adjustment of Asset Management Plans M01.01 Strategic Planning M01.05 Development and Update of a Long-Term Investment Program
2	Functional Areas Risk Registers and Matrices	C03.01 Development and Adjustment of Asset Management Plans M01.01 Strategic Planning M05.02 Internal Audit S01.01 Procurement Planning S02.01 Organizational Design
2	Project Risk Registers and Matrices	C02 Asset Acquisition C03 Asset Development and Monitoring of Operator's Activities C04 Asset Work Program Implementation
3	Operator's Risk Registers	C04 Asset Work Program Implementation

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		M01.01 Strategic Planning
4	Asset / SA Risk Registers and Matrices	C04 Asset Work Program Implementation
		M01.01 Strategic Planning
5	Group-Level Risks Registers	M03.01 Preparation of Annual Budget M03.02 Preparation of Medium-Term Budget S06 Financial Services M01.01 Strategic Planning M01.05 Development and Update of a Long-Term Investment Program C02 Asset Acquisition C03 Asset Development and Monitoring of Operator's Activities
6	Operator's / Asset / SA Risk Registers (Measures sheet)	M03.01 Preparation of Annual Budget M03.02 Preparation of Medium-Term Budget S06 Financial Services C04 Asset Work Program Implementation M01.01 Strategic Planning
7	Reports on risk and measures monitoring	C03 Asset Development and Monitoring of Operator's Activities M01.01 Strategic Planning M01.05 Development and Update of a Long-Term Investment Program M01.03 Monitoring of Financial and Economic Indicators of the Asset Portfolio M03.04 Budget Performance Monitoring M04.03 Risk Management Planning, Monitoring and Continuous Improvement
8	Risks Reports	C03 Asset Development and Monitoring of Operator's Activities M01.01 Strategic Planning M01.05 Development and Update of a Long-Term Investment Program C03.03 Monitoring of the Asset Plans Implementation and Budget Fulfillment M01.03 Monitoring of Financial and Economic Indicators of the Asset Portfolio C03.04 Operational Monitoring of Activities of the Operator M05.05 Management System Analysis by Management M05.02 Internal Audit S09.05 External Audit Management M04.03 Risk Management Planning, Monitoring and Continuous Improvement

8. General Provisions

8.1 Process Structure

- 8.1.1 The risk management process of the Company is a macro-process and is categorized as a managerial process.
- 8.1.2 This Procedure establishes uniform requirements for risk management of the Company and allocation of responsibilities among the process participants.
- 8.1.3 In risk management, the requirements of the risk management regulations of Gazprom PJSC are met and, when necessary, the provisions of guidelines of Gazprom PJSC for the relevant areas are applied.
- 8.1.4 Unless otherwise defined herein, the used terms shall be interpreted based on their definitions in the Policy on Risk Management and Internal Control of Gazprom PJSC.

8.2 Level of Decision-Making on Risks

- 8.2.1 Risk management is performed at several levels (Figure 1):
 - Group-Level Risks;
 - Functional Area-Level Risks;
 - Project-Level Risks;
 - Asset-Level Risks (during Valuation, Acquisition, Development, and Divestment);
 - SA-Level / Branch Office-Level / Representative Office-Level Risks (as required);
 - Operator-Level Risks.
- 8.2.2 If necessary, risks may be combined according to a different principle (e.g., HSE Risks or Information Asset Risks).

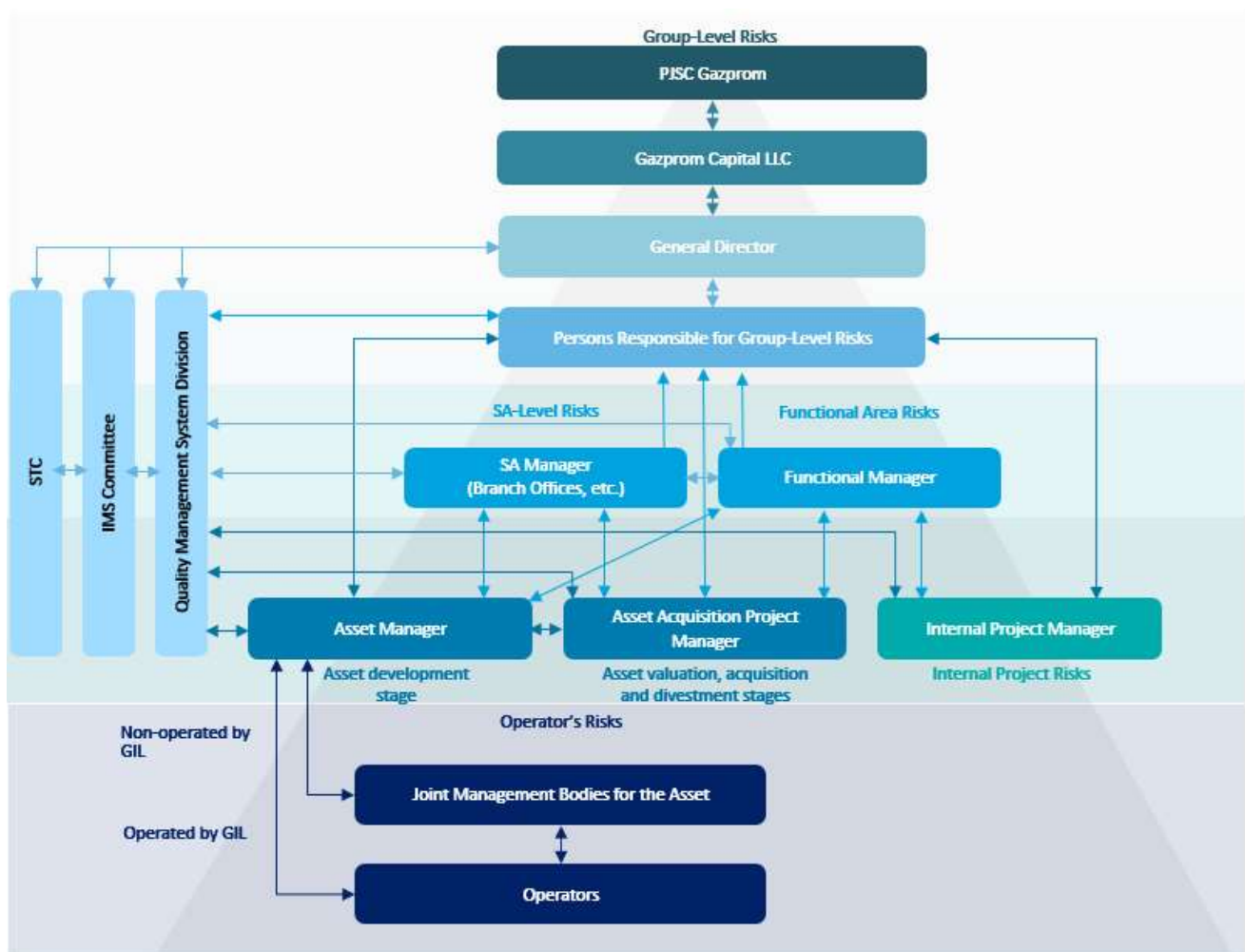



Figure 1. Risk Levels

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- 8.2.3 The risk management process of the organization includes the following second-level processes:
- M04.01 Risk identification, analysis, assessment and response;
 - M04.02 Risk monitoring;
 - M04.03 Risk management planning, monitoring and continuous improvement;
 - M04.04 Compliance control.
- 8.2.4 Information on risks that reached the maximum permissible level is submitted to an upper level for subsequent analysis (for example, from the Operator level to the Asset level, from the Asset level to the SA/Group level). Information on risks that did not reach the maximum permissible level is considered only at the level where such risk was identified.
- 8.2.5 Individual risk management processes imply the implementation of the relevant requirements of Gazprom PJSC, in particular:
- Liquidity risk management in accordance with Regulations on Liquidity Risk Management of Gazprom PJSC;
 - Foreign exchange risk management in accordance with Regulations on Foreign Exchange Risk Management of Gazprom PJSC;
 - Interest rate risk management in accordance with Regulations on Interest Rate Risk Management of Gazprom PJSC;
 - Credit risk management in accordance with Regulations on Credit Risk Management of Gazprom PJSC.

9. Process Implementation Procedure

9.1 Planning of Risk Management Activities

On an annual basis and subject to the start of the business planning cycle, the QMSD prepares proposals for discussion on update of:

- RM Methodology;
- Maximum Permissible Level of Risks;
- Key Risk Indicator.

9.1.1 RM Methodology


- a) The QMSD reconsiders the RM methodology (established in the applicable procedures, including this Procedure, which, if necessary, are subject to revision) and, if necessary, forms proposals for discussion to adjust the RM methodology, including taking into account the requirements of regulatory documents of Gazprom PJSC on RM, and then submits proposals for approval to the IMS Committee.
- b) The IMS Committee considers and approves the RM methodology and makes its recommendations and suggestions.
- c) The General Director approves the RM methodology.

QMSD

QMSD

IMS
Committee

General
Director

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9.1.2 Maximum Permissible Risk Level

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| a) The QMSD reconsiders the maximum permissible risk level, which can be recorded both in the forms used for risk assessment and in a separate document, and, if necessary, forms proposals for discussion of its adjustment, and then sends proposals for approval to the General Director. | QMSD |
| b) The maximum permissible risk level is set in the form of a combination of probability and materiality indicators, a confidence interval for a quantitative indicator or in the format of the mathematical expectation of the value of a variable. | QMSD |
| c) If necessary, the maximum permissible risk level can be set separately for different risk subclusters or management levels. | QMSD |
| d) The General Director considers and approves the maximum permissible risk level. | General Director |
| e) If necessary, the maximum permissible risk level is agreed with Gazprom PJSC. | QMSD |
| f) The risk criteria as applied to the ISMS are determined by the Head of the ITD on the basis of a periodic analysis of the ISMS by the Management of the Company. | ITD |

9.1.3 The risk management system development action plan is formed either as part of the quality management action plan for the year or as a separate document in the annual report format for Gazprom PJSC.

9.2 M04.01 Risk identification, analysis, assessment and response

- 9.2.1 The risk identification consists of searching for, defining and describing risks that may help or prevent the Company from achieving its goals. The risks may be identified as a result of:
- routine or ad hoc update of the risks (including the risk sessions);
 - business activities;
 - Strategy development/update;
 - written application of any employee of a Group Company;
 - internal/external audit;
 - Feasibility Study and Financial Feasibility Study of a project;
 - development of the project Work Plan and Budget;
 - project expert review when transiting to the next stage, etc.
- 9.2.2 The risk identification should also cover opportunities, i.e., events with a potentially positive impact on the achievement of the established goals.
- 9.2.3 The risk analysis is to understand the risk nature and its features. The risk analysis includes detailed consideration of the risk causes, consequences, risk classification, determination of responsibility for risk management.
- 9.2.4 Within the risk analysis, key risk identifiers are determined in accordance with the guidelines of Gazprom PJSC in order to ensure operational risk management.
- 9.2.5 Risk assessment is to determine the risk significance for further risk prioritizing. Assessment can be both qualitative and quantitative. The assessment methods are applied based on the specific risks and applicable requirements, and include the application of the relevant procedure instructions of Gazprom PJSC.
- 9.2.6 If there are no requirements of Gazprom PJSC regarding the use of respective methods for risk assessment and preparation of its results, an internal regulatory document Methodology on Risk Management of the Group Companies is used.
- 9.2.7 Risk assessment also involves assessing the residual risk, the forecast value of which enables assessment of the expected effectiveness of the planned risk management measures.

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9.2.8 In order to systematize information on identified risks, risks are classified according to a number of attributes enabling application of appropriate unique identifiers. The classification methodology can be based on the Risk Classifier of Gazprom PJSC, depending on the objectives.	
9.2.9 Risk response consists in developing and implementing risk management measures that help to reduce risk probability and/or materiality to an acceptable level. As part of the RM process, the risk response is implemented when new risks are identified (when it is necessary to treat the risk level) in the course of business activities, and on a periodic basis.	
9.2.10 Documentation of information on risks and risk management measures is carried out using risk registers in a spreadsheet format, which can be replaced by a database within the corresponding electronic module as part of automation.	
9.2.11 The list of information to be included in the risk registers may vary for risks of different levels of significance, including the information to complete risk passports according to the form of Gazprom PJSC for individual risks.	
9.2.12 If necessary, risk registers or individual risks can be sent for approval and formal approval to ensure that the necessary risk management measures are implemented.	
9.2.13 For each area and at each level, the available risk registers should be constantly updated by making adjustments and additions based on data on changes in the internal and external environment, as well as on the implementation of risk management measures.	
9.2.14 Based on the risk analysis and assessment, existing internal control procedures should be updated as necessary. The effectiveness of existing internal control procedures should be taken into account when assessing and reassessing the level of risk.	
9.2.15 As part of expert support, the QMSD may: <ul style="list-style-type: none"> • Provide methodological support for the preparation of materials on risks and risk management measures to be submitted for discussion, as well as their subsequent verification; • Monitor the implementation of the risk management measure plan, as well as provide methodological support to the Persons Responsible when monitoring the implementation and effectiveness of the risk management measures; • Provide independent opinion regarding completeness and relevance of the risks submitted for discussion; • Prepare proposals on risk wordings; • Approve the RM cycle materials. 	QMSD
9.2.16 The risk criteria as applied to the ISMS are determined by the Head of the ITD for each identified risk.	ITD
9.2.17 On the basis of periodic analysis, the ITD prepares a risk register for accountable assets (as applied to the ISMS).	ITD
9.3 Project-Level Risks	
9.3.1 Routine Risk Update	
a) The Project Manager with the members of the Project Team identifies, analyzes and assesses risks, and develops risk management measures at each phase of the project at all its stages (initiation, planning, execution, monitoring and completion, and at each stage there must be either a reconsideration, including partial reconsideration, of the risks identified at the previous stage, or confirmation of their relevance) both during project operations and when crossing milestones.	PM/PT
b) The project schedule shall include initial risk identification, analysis, and assessment, as well as routine risk update.	PM/PT
c) The Project Manager ensures the development of the Project Risk Register and reflects the information on the project risks in the project documentation.	PM

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d) In accordance with the project milestone schedule (at least twice a year), the Project Manager identifies the Group-Level Project Risks (and risk management measures) exceeding the maximum permissible level, and qualifies them as Group-Level Project Risks by transferring such risks and related measures to the Group-Level Risk Register.	PM
e) The Project Manager discusses the current Project Risks at the progress meetings. When it is necessary to escalate the information on Project Risks and project risk management measures (in case of a critical change in the external and internal environment, causes, consequences and risk assessment), the Project Manager can promptly provide the QMSD with the information on the Project Risks at any time.	PM
f) The QMSD evaluates whether the information provided by the Project Manager is complete and consistent with the approved methodology, and proposes adjustments therefor if necessary.	QMSD
9.3.2 Risk identification in the course of business activities.	
a) Risk identification is a continuous process. In business activities, project risks can be identified based on various sources such as internal and external audit findings, information on risks from employees, changes in the internal and external environment, and other sources listed in Clause 9.2.1.	
b) To identify, assess, and update the risks, the Project Manager engages Project Team members necessarily including dedicated experts. The Regulations on Internal Project Management describe how a Project Team is formed.	PM
c) Once a new risk is identified, the employee who has identified such a new risk shall provide data thereon to the Project Manager.	
d) The Project Manager analyzes the provided information on the new risks and decides to whether distinguish a new separate risk or adjust the causes/consequences/assessment of the existing risks, develop or adjust the risk management measures to promptly respond thereto, includes the information into the Project Risk Register, and submits it to the QMSD. The Project Manager shall take the information on the new risks into account in decision making and managing the activities.	PM
e) The QMSD evaluates whether the information provided by the Project Manager is consistent with the approved methodology, whether or not does it redundantly cover the existing risks, subject to internal and external audit findings and other sources. If necessary, the QMSD proposes adjustments and additions to the information provided. If not approved by Project Manager, the QMSD may submit, as an independent opinion on the risks, its own proposals regarding the risks for consideration by the Project Steering Committee.	QMSD
9.4 Asset-Level Risks (during Asset Valuation, Acquisition, and Divestment)	
9.4.1 Routine Risk Update	
a) When an asset is acquired, title documents shall include the Operator’s obligation to provide the Joint Advisory Management Body for the Asset with information on key risks.	AAPM
b) The asset acquisition schedule shall include activities related to the initial risk identification, analysis, and assessment, as well as those of routine risk update.	AAPM
c) During valuation and acquisition, the Asset Acquisition Project Manager identifies, analyzes, and assesses (including in quantitative terms) Asset Risks to decide whether to join a project, considers the risks associated with the preparation of project documentation, develops risk management measures, and ensures that an Asset Risk Register is formed, followed by the approval of asset risk data by the QMSD.	AAPM
d) The QMSD evaluates whether the information provided by the Asset Acquisition Project Manager is complete and consistent with the approved methodology and proposes adjustments therefor if necessary.	QMSD

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e) The Asset Acquisition Project Manager defines the Group-Level Asset Risks (and risk management measures) exceeding the maximum permissible level, and qualifies them as Group-Level Asset Risks by transferring such risks and related measures to the Group-Level Risk Register.	AAPM
f) When transiting to the Development Stage, the Asset Acquisition Project Manager provides the Asset Manager and QMSD with the information on the Asset Risks.	AAPM
9.4.2 Risk identification in the course of business activities.	
a) Risk identification is a continuous process. In business activities, the Asset Risks can be identified based on various sources such as internal and external audit findings, information on risks from employees, changes in the internal and external environment, and other sources listed in Clause 9.2.1.	
b) To identify, assess, and update the risks, the Asset Acquisition Project Manager engages Project Team members necessarily including dedicated experts. The Regulations on Oil & Gas Asset Management describe how a Project Team is formed.	AAPM
c) Once a new risk is identified, the employee who has identified such a new risk shall provide data thereon to the Asset Acquisition Project Manager.	
d) The Asset Acquisition Project Manager analyzes the provided information on the new risks and decides to whether distinguish a new separate risk or adjust the causes/consequences/assessment of the existing risks, develop or adjust the risk management measures to promptly respond thereto, includes the information into the Asset Risk Register, and submits the same to the QMSD. The Asset Acquisition Project Manager shall take the information on the new risks into account in decision making and managing the activities.	AAPM
e) The QMSD evaluates whether the information provided by the Asset Acquisition Project Manager is consistent with the approved methodology, whether or not does it redundantly cover the existing risks, subject to internal and external audit findings and other sources. If necessary, the QMSD proposes adjustments and additions to the information provided. If not approved by the Asset Acquisition Project Manager, the QMSD may submit, as an independent opinion on the risks, its own proposals regarding the risks for consideration by the asset collective bodies.	QMSD
9.5 Operator-Level Risks (if more than 50% is owned or if there are certain requirements established for the Operator)	
9.5.1 Routine Update of the Risk Register	
a) The Operator identifies, analyzes, and assesses the risks and develops an Operator's Risk Register.	Operator
b) The dates of initial risk identification, analysis, and assessment shall be established and agreed with the Asset Manager or a collective body for the Asset, and the routine update of risks shall be scheduled before budgeting for the next year.	AM/JAMBA
c) The Operator submits the Operator's Risks Register for consideration by the QMSD.	Operator
d) The QMSD evaluates whether the information provided by the Operator is complete and consistent with the approved methodology, proposes adjustments therefor if needed, and returns the same to the Operator.	QMSD
e) If an Asset is operated by the Company, the Operator submits the Operator's Risk Register approved by the QMSD to the Asset Manager.	Operator
f) If an Asset is non-operated, the Operator submits the Operator's Risk Register approved by the QMSD to the Joint Advisory Management Body for the Asset for consideration and approval.	Operator
g) The Asset Manager approves the Operator's Risk Register if the Asset is an operated one.	AM
h) The Joint Advisory Management Body for the Asset approves the Operator's Risk Register if the Asset is non-operated.	JAMBA
9.5.2 Risk identification in the course of business activities.	

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| a) In business activities, Operator’s Risks can be identified based on various sources such as internal and external audit findings, information on risks from employees, changes in the internal and external environment, and other sources listed in Clause 9.2.1. | |
| b) The Operator analyzes the information on the new risks and decides to whether distinguish a new separate risk or adjust the causes/consequences/assessment of the existing risks, develop or adjust the risk management measures to promptly respond thereto, includes the information into the Operator’s Risk Register, and submits the same to the QMSD. The Operator shall take the information on the new risk into account in decision making and managing the activities. | Operator |
| c) The QMSD evaluates whether the data from the Operator are consistent with the approved methodology. If necessary, the QMSD proposes adjustments and additions to the information provided. If not approved by the Operator and the Asset Manager, the QMSD may submit, as an independent opinion on the risks, its own proposals regarding the risks for consideration by the asset collective bodies. | QMSD |

9.6 Asset-Level Risks (during Asset Development)

9.6.1 Routine Risk Update

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| a) The Asset Manager identifies, analyzes, and assesses Asset Risks (also based on an analysis of the Operator’s Risks) and, with a methodological support from the QMSD, ensures the development of an Asset Risk Register. When developing the Asset Risks Register, the Asset Manager focuses on the Operator’s Risks exceeding the maximum permissible level of significance, but may also analyze other Operator’s Risks if needed. | AM |
| b) The initial risk identification, analysis, and assessment shall be included in the asset management schedule at the planning stage, and the routine risk update shall be scheduled before asset budgeting for the next year. | AM |
| c) For the risks that can be assessed in quantitative terms, the Asset Manager, involving the Financial Block (FB), assesses the need for a quantitative assessment, prepares the information for such assessment and submits it to the Financial Block. | AM |
| d) The Financial Block carries out the quantitative assessment of the Asset Risks and submits the results thereof to the QMSD for approval. | FB |
| e) The QMSD evaluates whether the results of the Asset Risks quantitative assessment are accurate and consistent with the approved methodology, proposes adjustments therefor (if necessary), and then submits the results to the Asset Manager. | QMSD |
| f) At least twice a year the Asset Manager defines the Group-Level Asset Risks exceeding the maximum permissible level, and qualifies them as Group-Level Asset Risks by transferring such risks and related measures to the Group-Level Risk Register. | AM |
| g) The Asset Manager discusses the current Asset Risks at the progress meetings. When it is necessary to escalate the information on the Asset Risks and Asset Risk management measures (in case of a critical change in external and internal environment, causes, consequences, and risk assessment), the Asset Manager can promptly provide the QMSD with the information on the Asset Risks at any time. | AM |
| h) The QMSD evaluates whether the information provided by the Asset Manager is complete and consistent with the approved methodology, and proposes adjustments therefor if needed. | QMSD |
| i) In the course of operating activities, and based on the planned measures, the Asset Manager ensures the response to the Asset Risks by means of performing / monitoring the risk management measures and quick response to the occurred risks. | AM |

9.6.2 Risk identification in the course of business activities.

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| a) Risk identification is a continuous process. In business activities, the Asset Risks can be identified based on various sources such as internal and external audit findings, information on risks from employees, changes in the internal and external environment, and other sources listed in Clause 9.2.1. | |
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| b) To identify, assess, and update the risks, the Asset Manager engages Asset Development Team / CWG members necessarily including dedicated experts. The Regulations on Oil & Gas Asset Management describe how an ADT / CWG is formed. | AM |
| c) Once a new risk is identified, the employee who has identified such a new risk, shall provide data thereon to the Asset Manager. | |
| d) The Asset Manager analyzes the provided information on the new risks and decides to whether distinguish a separate new risk or adjust the causes/consequences/assessment of the existing risks, develop or adjust the risk management measures to promptly respond thereto, includes the information into the Asset Risk Register, and submits the same to the QMSD. The Asset Manager shall take the information on the new risks into account in decision making and managing the activities. | AM |
| e) The QMSD evaluates whether the information from the Asset Manager is consistent with the approved methodology, whether or not does it redundantly cover the existing risks, subject to internal and external audit findings and other sources. If necessary, the QMSD proposes adjustments and additions to the information provided. If not approved by the Asset Manager, the QMSD may submit, as an independent opinion on the risks, its own proposals regarding the risks for consideration by the collective body. | QMSD |

9.7 SA / Branch Office / Representative Office - Level Risks

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| 9.7.1 The Group - Level SA / Branch Office / Representative Office Risks are managed according to the need for organizing the risk management in a separate SA / Branch Office / Representative Office, and based on the particularities of their activities. | SB for SA |
| 9.7.1 If necessary, the decision on distinguishing the risks of a separate SA / Branch Office / Representative Office may be formalized as a separate order or instruction where the time lines for the risk management measures shall be established. | SB for SA |
| 9.7.2 Routine Update of the Risk Register | |
| a) The Persons Responsible for SA / Branch Office / Representative Office Risks identify, analyze, and assess the risks and develop a SA / Branch Office / Representative Office Risk Register, as well as a SA / Branch Office / Representative Office Risk Matrix. The Persons Responsible for SA / Branch Office / Representative Office Risks may take into account the information on the Asset Risks and Operator's Risks when identifying, analyzing and assessing the risks. | PR for SA Risk |
| b) At least twice a year the SA / Branch Office / Representative Office Manager defines the Group-Level SA / Branch Office / Representative Office Risks exceeding the maximum permissible level and qualifies them as Group-Level SA / Branch Office / Representative Office Risks by transferring such risks and related measures to the Group-Level Risk Register. | SAM |
| c) The SA / Branch Office / Representative Office Manager discusses the current SA / Branch Office / Representative Office Risks at the progress meetings. When it is necessary to escalate the information on SA / Branch Office / Representative Office Risks and respective risk management measures (in case of a critical change in external and internal environment, causes, consequences, and risk assessment), the SA / Branch Office / Representative Office Manager can promptly provide the QMSD with the information on the SA / Branch Office / Representative Office Risks at any time. | SAM |
| d) The QMSD evaluates whether the information provided by the SA / Branch Office / Representative Office Manager is complete and consistent with the approved methodology, and proposes adjustments therefor if needed. | QMSD |
| e) In the course of operating activities, and based on the Risk Register, the Persons Responsible for a SA / Branch Office / Representative Office Risks ensure the response to the SA / Branch Office / Representative Office Risks by means of performing / monitoring the risk management measures and quick response to the occurred risks. | PR for SA Risk |
| 9.7.3 Risk identification in the course of business activities. | |

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| <ul style="list-style-type: none"> a) Risk identification is a continuous process. In business activities, the SA / Branch Office / Representative Office Risks can be identified based on various sources such as internal and external audit findings, information on risks from employees, changes in the internal and external environment, and other sources listed in Clause 9.2.1. b) Once a new risk is identified, the employee who has identified such a new risk, shall provide data thereon to the SA / Branch Office / Representative Office Manager. c) The SA / Branch Office / Representative Office Manager analyzes the provided information on the new risks and decides to whether distinguish a new separate risk or adjust the causes/consequences/assessment of the existing risks, develop or adjust the risk management measures to promptly respond thereto, includes the information into the SA / Branch Office / Representative Office Risk Register, and submits the same to the QMSD. The SA / Branch Office / Representative Office Manager shall take the information on the new risks into account in decision making and managing the activities. d) The QMSD evaluates whether the information provided by the SA / Branch Office / Representative Office Manager is consistent with the approved methodology, whether or not does it redundantly cover the existing risks, subject to internal and external audit findings and other sources. If necessary, the QMSD proposes adjustments and additions to the information provided. If not approved by the SA / Branch Office / Representative Office Manager, the QMSD may submit, as an independent opinion on the risks, its own proposals regarding the risks for consideration by the collective bodies. | SAM

QMSD |
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9.8 Functional Area - Level Risks

9.8.1 Routine Update of the Risk Register

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| <ul style="list-style-type: none"> f) The Persons Responsible for Functional Area Risks identify, analyze, and assess the risks and develop a Functional Area Risk Register, as well as a Functional Area Risk Matrix. When identifying, analyzing, and assessing Functional Area Risks, The Persons Responsible for Functional Area Risks shall use relevant information on the Asset and Operator's Risks in the respective area, as well as those of the projects covered by this functional area. g) During the identification of Functional Area risks, these risks shall not duplicate Asset, Operator's, and Project risks and shall include the following: a summary of relevant Asset, Operator's, and Project risks with a view to the factors of these risks, and risks specific for a given functional area. h) Initially, the Functional Area Risks may be identified by any employee of a given functional area, but then they should be approved by an employee appointed responsible for this risk. i) The Functional Manager approves the Functional Area Risks, Functional Area Risk management measures, and Functional Area Risk Matrix. j) At least twice a year the Functional Manager defines the Group-Level Functional Area Risks exceeding the maximum permissible level and qualifies them as Group-Level Functional Area Risks by transferring such risks and related measures to the Group-Level Risk Register. k) The Functional Manager discusses the current Functional Area Risks at the progress meetings. When it is necessary to escalate the information on Functional Area Risks and Functional Area Risk management measures (in case of critical change in the external and internal environment, causes, consequences and risk assessment), the Functional Manager can promptly provide the QMSD with the information on the Functional Area Risks at any time. l) The QMSD evaluates whether the information provided by the Functional Manager is complete and consistent with the approved methodology, and proposes adjustments therefor if needed. | PR for FR

QMSD |
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<p>m) In the course of operating activities, and based on the Risk Register, the Persons Responsible for Functional Area Risks ensure the response to the Functional Area Risks by means of performing / monitoring the risk management measures and quick response to the occurred risks.</p>	FM
<p>9.8.2 Risk identification in the course of business activities.</p>	
<p>e) Risk identification is a continuous process. In business activities, Functional Area Risks can be identified based on various sources such as internal and external audit findings, information on risks from employees, changes in the internal and external environment, and other sources listed in Clause 9.2.1.</p>	
<p>f) Once a new risk is identified, the employee who has identified such a new risk, shall provide data thereon to the Functional Manager, or to the Person Responsible for the respective risk, or record this information as a new risk in the Functional Area Risk Register.</p>	
<p>g) The Functional Manager analyzes the provided information on the new risk and decides to whether distinguish a new separate risk or adjust the causes/consequences/assessment of the existing risks, develop or adjust the risk management measures to promptly respond thereto, and submits the same to the QMSD. The Functional Manager shall take the information on the new risks into account in decision making and managing the activities.</p>	FM
<p>h) The QMSD evaluates whether the information provided by the Functional Manager is consistent with the approved methodology, whether or not does it redundantly cover the existing risks, subject to internal and external audit findings and other sources. If necessary, the QMSD proposes adjustments and additions to the information provided.</p>	QMSD
<p>9.9 Group-Level Risks</p>	
<p>9.9.1 Routine Update of the Risk Register</p>	
<p>a) Based on the information on Group-Level Risks received from the Asset Manager, Project Manager, SA / Branch Office / Representative Office Manager, and Functional Manager, the QMSD provides the information on these risks to the Persons Responsible for Group-Level Risks in accordance with their areas of responsibility, or proposes to appoint new Persons Responsible for the Group-Level Risks identified by the Operator, Asset Manager and SA Manager.</p>	QMSD
<p>b) The Persons Responsible for Group-Level Risks update the information on the risks and measures in the areas of their responsibility, identify, analyze, and assess new risks and measures related to the Group-Level Risks. In the course of such analysis, the Persons Responsible for Group-Level Risks analyze, among other, the information on the risks within their areas of responsibility received from the Asset Managers and SA / Branch Office / Representative Office Managers, and, if necessary, adjust/complete the information on such risks, assess them at the Group level, and develop the measures to manage these risks at the Group level.</p>	PR for Group-Level Risk
<p>c) For some risks the limits for risk established by the PJSC Gazprom shall be taken into account within the risk management measures.</p>	PR for Group-Level Risk
<p>d) For the risks that can be assessed in quantitative terms, the Persons Responsible for such risks, involving the Financial Block (FB), assess the need for a quantitative assessment, prepare the information for such assessment, if needed, and submit it to the Financial Block.</p>	PR for Group-Level Risk
<p>e) The Finance Block carries out the quantitative assessment of the Group-Level Risks and submits the results thereof for approval by the QMSD.</p>	FB
<p>f) The QMSD evaluates whether the results of the Group-Level Risks quantitative assessment are accurate and consistent with the approved methodology, proposes adjustments therefor (if necessary), and then submits the results to the Persons Responsible for Group-Level Risks.</p>	QMSD

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g) The Persons Responsible for Group-Level Risks make, within the areas of their responsibility, additions/adjustments to the Group-Level Risks description and Group-Level Risks management measures obtained upon the quantitative risk assessment, and provide them to the QMSD.	PR for Group-Level Risk
h) The QMSD evaluates whether the information provided by the Persons Responsible for Group-Level Risks is complete and consistent with the approved methodology, receives and analyzes the information upon internal and external audit, and from other sources, makes proposals on adjustments and additions to the provided information to the Persons Responsible for Group-Level Risks. If not approved by the Persons Responsible for Group-Level Risks or Persons Responsible Group-Level Risk Cluster, the QMSD may submit, as an independent opinion on the risks, its own proposals regarding the risks for consideration by the STC.	QMSD
i) The QMSD develops a consolidated Group-Level Risk Register and a Group-Level Risk Matrix (at least twice a year).	QMSD
j) The Persons Responsible for Group-Level Risk Cluster approves the Group-Level Risk Register in the areas of their responsibility.	PR for Group-Level Risk Cluster
k) When analyzing the IMS, the Management considers the Group-Level Risk Matrix from the annual Risk Report, formulates recommendations and risk management measures.	Management
l) When reviewing the annual Risk Report, as part of the analysis of the materials on IMS, the General Director approves the Group-Level Risk Matrix.	General Director
m) In the course of operating activities, and based on the Risk Register, the Persons Responsible for Group-Level Risks ensure the response to the Group-Level Risks by means of performing / monitoring the risk management measures and quick response to the occurred risks, and after that promptly provide the up-to-date information on risk occurrence, response, and monitoring to the QMSD.	PR for Group-Level Risk
9.9.2 Risk identification in the course of business activities.	
a) Risk identification is a continuous process. In the course of business activities, the risks affecting the activities of the whole Group of Companies can be identified based on various sources such as internal and external audit findings, information on risks from employees, changes in the internal and external environment, and other sources listed in Clause 9.2.1.	
b) Once a new risk is identified, the employee who has identified such a new risk shall provide data thereon to the Person Responsible for Group-Level Risks.	
c) The Person Responsible for the Risk also receives the information on the new risks of other levels, which have been upscaled to the Group level following the assessment.	PR for Group-Level Risk
d) The Person Responsible for Group-Level Risks analyzes the provided information on the new risks and decides to whether distinguish a separate new risk or adjust the causes/consequences/assessment of the existing risks, develop or adjust the risk management measures to promptly respond thereto, includes the information into the Group-Level Risk Register, and submits the same to the QMSD. The Person Responsible for Group-Level Risks shall take the information on the new risks into account in decision making and managing the activities.	PR for Group-Level Risk
e) The QMSD evaluates whether the information provided by the Person Responsible for Group-Level Risks is consistent with the approved methodology, whether or not does it redundantly cover the existing risks, subject to internal and external audit findings and other sources. If necessary, the QMSD proposes adjustments and additions to the information provided by the Persons Responsible for Group-Level Risks. If not approved by the Persons Responsible for Group-Level Risks or Persons Responsible Group-Level Risk Cluster, the QMSD may submit, as an independent opinion on the risks, its own proposals regarding the risks for consideration by the STC.	QMSD




9.10 Strategic Risks

Strategic Risks are identified in the risk registers of the functional areas responsible for development and implementation of M01.01 Strategic Planning and M01.02 Strategic Controlling processes.

The basis for the identification of relevant risks is, among others, the information on the Asset and Project Risks.

Strategic Risks that exceed the maximum permissible level, as well as other significant risks, are qualified as Group-Level Risks and included into the respective register.

Strategy
and
Market
Analysis
Division
QMSD

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9.11 M04.02 Risk monitoring; M04.03 Risk management planning, monitoring and continuous improvement

Risk monitoring is a continuous process. Monitoring is performed on a regular basis, as well as when necessary. Monitoring consist of:

- Monitoring of risk level;
- Monitoring of measures;
- Monitoring of RMS efficiency.

9.11.1 Monitoring of risk level

- a) During the operating activities, the Project Manager, Operator, Asset Manager, SA / Branch Office / Representative Office Manager, Functional Manager and Persons Responsible for Group-Level Risks (hereinafter referred to as the "Persons Responsible for Monitoring") analyze the changes in risk causes and consequences identified earlier, and reassess the risks specifying the results in the corresponding Risk Registers.
- b) For operational monitoring of the risk level, the values of Key Risk Indicators should be monitored, based on changes of which a decision on the need to reassess risks, or implement additional measures, can be adopted.
- c) In addition, the Persons Responsible for Monitoring monitor the risk occurrence, including the recording of each risk occurrence in the Occurred Risk Database (according to the form in Appendix 3 or the form of reporting information on the occurred risks of Gazprom PJSC), and analyze the risk occurrence causes and consequences. The Occurred Risk Database is submitted to the QMSD when preparing Risk Reports.
- d) The ITD regularly processes the risks and monitors the effectiveness of the measures applied (as applied to the ISMS).

Persons Responsible for Monitoring

Persons Responsible for Monitoring

Persons Responsible for Monitoring

ITD

9.11.2 Monitoring of measures implementation and effectiveness

- a) On a continuous basis, the Persons Responsible for Monitoring monitor the status of implementation of measures including control of timeliness and completeness of the measures implementation in accordance with the established deadlines, and assess the measures effectiveness.
- b) The monitoring of the status of measures implementation is recorded in the status of risk management measures implementation in the Risk Register. The Persons Responsible for Monitoring regularly submit the results of monitoring of measures implementation to the QMSD.
- c) The effectiveness of the measures is assessed based on the impact of a measure on the risk parameters (probability and materiality), i.e. if the developed measures contribute to a decrease in the risk probability and/or decrease in the extent of damage down to an acceptable level in the case of risk occurrence. The results of the measures effectiveness monitoring are recorded in the adjustment of the risk management measures in the Risk Register and provided to the QMSD.

Persons Responsible for Monitoring

Persons Responsible for Monitoring

Persons Responsible for Monitoring

9.11.3 Monitoring of RMS efficiency

- a) The Internal Audit Division and the audit team during the internal audit of the IMS monitor the RMS efficiency and the effectiveness of implementation of measures aimed at the RMS improvement. The RMS assessment results, as part of the materials on audits performed, are submitted to the QMSD, included in the annual Risk Report and approved at an IMS Committee meeting.
- b) On a continuous basis, the QMSD analyzes the RMS efficiency during the operating activities and methodological support for stakeholders. Thereafter, it includes the RMS efficiency analysis results in the IMS analysis materials for consideration by the Management.

IAD and/or External Auditor

QMSD

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| c) To assess the RMS efficiency, an RMS self-assessment can also be conducted, which can use both the regulatory materials of the used RM reporting forms for Gazprom PJSC and other approaches. These approaches take into account the results of audits, and also involve a comprehensive assessment of all elements of the RMS in terms of their availability and degree of implementation. The results of this self-assessment are also included in the IMS analysis materials for consideration by the Management. | QMSD |
| d) The IMS Committee, as part of the consideration of the IMS analysis materials by the Management, approves the results of the RMS assessment, as well as the results of the RMS efficiency analysis. | IMS Committee |

9.12 Preparation of Risk Management Reports

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| 9.12.1 QMSD and the Responsible Persons maintain the following information: <ul style="list-style-type: none"> • Risk Registers (Project-Level Risks / Operator-Level Risks / Asset-Level Risks / Functional Area-Level Risks / SA-Level Risks / Branch Office-Level Risks / Representative Office-Level Risks / Group-Level Risks and Structural Unit-Level Risks), ISMS Risk Register etc., with the respective Risk Matrices (Project-Level Risks / Operator-Level Risks / Asset-Level Risks / Functional-Level Risks / SA-Level Risks / Branch Office-Level Risks / Representative Office-Level Risks / Group-Level Risks); • Occurred Risk Database; • The results of risks and measures monitoring based on the changes in the risk assessments, implementation of measures (in the Risk Registers), and statistics of the occurred risks (in the Occurred Risk Database). • The results of the RMS efficiency assessment and proposals on RMS improvement as part of the IMS analysis materials for consideration by the Management. | QMSD |
| 9.12.2 Based on the reporting forms above, the QMSD prepares the following Risk Reports: <ul style="list-style-type: none"> • Reports for Gazprom PJSC according to the reporting forms and deadlines set by Gazprom PJSC. • Annual Report as part of IMS analysis materials subject to consideration by the Management: based on the results of risks and measures monitoring, Group-Level Risk Matrix and Report on the RMS efficiency assessment results, and proposals on the RMS improvement. | 9.12.3 |
| 9.12.4 Reports for Gazprom PJSC are prepared based on the requirements of Gazprom PJSC and include submission of the information on risks and RMS according to the formats established by Gazprom PJSC. | |
| 9.12.5 Annual Report (the structure is provided in Annex 2) is developed, discussed and approved as part of the IMS analysis materials subject to consideration by the Management. | |

10. Controlled Records

Code	Name	Storage Location / Access procedure Responsible Person	
GI/C.99.M0400-01	Risk Registers	QMSD / Head of QMSD	Access is open for all RM process participants in accordance with their roles
GI/C.99.M0400-02	Risk Matrices	QMSD / Head of QMSD	Access is open for all RM process participants in accordance with their roles
GI/C.99.M0400-04	Occurred Risk Database	QMSD / Head of QMSD	Access is provided upon request to all RM process participants in accordance with their roles
-	Risks Reports	QMSD / Head of QMSD	Access is open for all RM process participants in accordance with their roles

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Revision History

*A – added, C – changed, D – deleted

Version	Date	Section number	Type*	Brief description of revision
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3	06.02.2023		C, A, D	The document was revised based on the requirements of Gazprom PJSC and experience of application of the first version
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Annex 1. Form of Occurred Risk Database

Beginning of Form

Form code GI/C.99.M0501-04

Risk	Risk occurrence date	Detailed description of risk event	Consequences (damage) of risk occurrence	Cause of risk occurrence	Current preventive measures	Current corrective measures
1	2	3	4	5	6	7

End of Form

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Annex 2. Annual Report Structure

Beginning of Form

Annual/Semi-Annual Report Structure

- 1) Group-Level Risk Matrices
- 2) Results of the quantitative assessment of the Group-Level Risks (if any) consisting of the following components:
 - a) Waterfall Charts characterizing the forecast level of impact of the Group-Level Risks on the KPIs of the Group of Companies and the actual level of impact of the Group-Level Risks
 - b) Sustainability of achievement of the target KPIs including NPV distribution plot, Tornado chart, results of quantitative assessment of the risk impact on the KPIs
- 3) Results of risk management measures monitoring;
 - a) Status of the performance of all measures by risk subclusters
 - b) Description of measures that require attention/are performed with significant difficulties/delays
 - c) A slide with the additional (new) risk management measures
 - d) A slide with the summary on the results of the risk management measures monitoring
- 4) Statistics of occurred risks
- 5) Results of the RMS efficiency assessment
- 6) Proposals on the RMS improvement
- 7) A road map for implementing initiatives for the RMS improvement
- 8) Annexes

End of Form