

PRESS RELEASE  
AUGUST 19, 2010

## LUKOIL INTRODUCES A CODE OF BUSINESS ETHICS

This August OAO LUKOIL has introduced the Company's Code of Business Ethics. The Code is a set of the most important business rules of the Company and its employees, ethical corporate business practices, social responsibility and other top priority issues of business ethics.

Among other things, the document governs the relations of the Company's employees with OAO LUKOIL shareholders and investors. The Code specifically focuses on disclosure of information, which could potentially affect the price of LUKOIL securities (inside information). The Company has a very clear procedure set to identify the notion of an insider. It is constantly updating the list of insiders who are to follow special guidelines when dealing with LUKOIL securities.

A separate section of the Code is devoted to the corporate relations of the employees. Specifically, the Code eliminates all sexual, age, racial, national, religious and political discrimination of employees.

LUKOIL employees are recommended to constantly pursue professional development via a personnel training system and acquire new skills and the necessary expertise to improve their performance.

The Code also governs conflicts of interest when due to personal, family or other circumstances a LUKOIL employee loses or may lose loyalty and objectivity towards the Company. The resulting conflict of personal interests with the Company's interests will undermine its efficiency; for this reason the Company is entitled to prevent the effect of such conflicts.

The Code sets out appropriate relationships with business partners. Thus, LUKOIL declares its readiness to establish and maintain mutually beneficial relations with any partner in case it, just like the Company, adheres to the principles of mutual respect and mutual benefit, fairness, conscientiousness, and tight mutual obligations.

At the same time the Company advocates fair competition and compliance with all effective laws on competition in all countries of its presence.

The Code also states that LUKOIL employees must never accept presents, services,

payment for entertainment and vacations, monetary rewards or any other benefits, which may affect the impartiality and independence of their professional duties, or make decisions which might oppose the Company's interests.

The Code of Business Ethics also specifies the relations with state authorities and public organizations; particular attention is paid to HSE issues.

According to the provisions of the Code, the Company has established a business ethics committee, which looks into corporate ethical relations.

“It is important to bear in mind that each employee represents the Company and supports its reputation and credibility by their labor and attitude. The Code of Business Ethics is one of the tools to create a company in which all employees are members of the top business team,” Vagit Alekperov, OAO LUKOIL President and CEO, said.