



Information on Rosneft Deutschland GmbH and RN Refining & Marketing GmbH

The Bundesnetzagentur, as fiduciary of Rosneft Deutschland GmbH and RN Refining & Marketing GmbH, is providing the information below about the role of the two companies and their respective subsidiaries. This information is directed in particular at banks, business partners, service providers and customers of the two companies and their subsidiaries.

Rosneft Deutschland GmbH (RDG) and RN Refining & Marketing GmbH (RNRM)

- RDG and RNRM are based in Berlin, Germany. Both companies hold stakes in German refineries and pipelines in Germany and the EU.
- RDG has stakes in PCK Raffinerie GmbH (PCK), Bayernoil Raffineriegesellschaft mbH (Bayernoil), Mineralölraffinerie Oberrhein GmbH & Co. KG (MiRO) and in various oil pipelines in Germany (Deutsche Transalpine Oelleitung GmbH), Austria (Transalpine Ölleitung in Österreich GmbH), Italy (Soc IT per l'Oléodotto Transalpino SpA) and France (Société du pipeline Sud-Européen SA). RDG has crude oil processed in the refineries PCK in Schwedt/Oder, MiRO in Karlsruhe and Bayernoil in Neustadt a.d. Donau/Vohburg and is also responsible for distribution of the petroleum products produced in the refineries in line with its stake in each refinery and the crude oil processed there. RNRM supports RDG as a service company and holds shares in AET Raffineriebeteiligungsgesellschaft mbH, which in turn holds shares in PCK. RDG and its associate RNRM together hold a majority stake in PCK.
- The business activities of RDG and RNRM are of decisive importance for the functioning of society in the energy sector and the maintaining of security of supply. Owing to the scope of its oil transactions and its various stakes in refineries and pipelines, RDG is a central company in Germany's oil supply. PCK, which is operated jointly by RDG and RNRM, is one of the largest refineries in the Federal Republic of Germany and ensures a basic supply of petroleum products to the northeast of Germany and to Berlin airport.
- RDG and RNRM thus fulfil key functions that are essential for the security of supply in Germany and Europe.

The Bundesnetzagentur – fiduciary of RDG and RNRM

- In order to safeguard security of supply in Germany, on 16 September 2022 the Federal Ministry for Economic Affairs and Climate Action (BMWK) (now the Federal Ministry for Economic Affairs and Energy – BMWE) ordered the fiduciary management of RDG and RNRM

by the Bundesnetzagentur on the basis of section 17(1) to (5) and (8) of the Energy Security of Supply Act (EnSiG). Any disposition of the companies' assets is subject to the agreement of the Bundesnetzagentur. This basis enables the fiduciary to take action to keep the business running in accordance with its importance for the functioning of society in the energy sector. The decision to introduce fiduciary management was prompted by the fact that contractual partners and even companies with stakes in RDG and RNRM were parting ways from them owing to the market uncertainties caused in particular by their close ties to Russia and the sanctions imposed on Russia, the settlement of remaining contractual arrangements was thus subject to considerable delays and a refusal to provide operationally necessary services was hindering the business, especially with regard to critical operational processes, which is why there was a risk to the security of supply of petroleum products to the northeast of Germany.

- The Federal Administrative Court (BVerwG), as the court of first and last instance, confirmed the legality of the order of fiduciary management under the EnSiG in a ruling of 14 March 2023 and thus provided legal certainty. In its ruling, the BVerwG stressed that the order was in all respects in line with the provisions of the EnSiG as measured by the factual and legal situation at the time of its issuance. It had, in particular, been suitable and necessary to combat the risks to security of supply known and forecast at that time.
- The order was extended several times, most recently on 3 September 2025.
- On 28 February 2026, the BMWG ordered the fiduciary management of RDG and RNRM by the Bundesnetzagentur on the basis of section 6a(1) to (4) and (7) and (8) of the Foreign Trade and Payments Act (AWG). The fiduciary has the same scope of influence on the business operations of the two companies as under the previous orders on the basis of the EnSiG. Any disposition of the companies' assets is still subject to the agreement of the Bundesnetzagentur. The new fiduciary management has now been ordered for an unlimited period of time. If the current prohibition on the companies engaging in transactions due to Russia's war of aggression against Ukraine ends, the fiduciary management would also end.
- The fiduciary management order was issued under the AWG because only the order of fiduciary management or a similar firewall measure justifies an exception to the prohibition on transactions otherwise applicable under Article 5aa(1)(c) of Regulation (EU) No 833/2014. Without an appropriate measure there would be a specific threat to security of supply in Germany in the oil sector. Without an exception to the prohibition on transactions there would immediately be direct, negative effects on the two companies' business operations. The companies would be unable to engage in any economic activities.
- The fiduciary management means that the owners no longer have authority to issue instructions. The Bundesnetzagentur will ensure that an uncontrolled outflow of funds from RDG and RNRM is prevented and all payments are made to maintain business operations. The companies and their subsidiaries will meet their payment obligations for the continuation of their ongoing business operations.
- The Bundesnetzagentur has appointed Dr Johannes Bremer and Mr Andreas J. Goss as managing directors of both RDG and RNRM.

Questions related to sanctions

If contracting parties of RDG, RNRM or their subsidiaries have questions related to sanctions imposed by the European Union, their attention is drawn to the information provided by the

BMWE (<https://www.bundeswirtschaftsministerium.de/Redaktion/EN/FAQ/sanctions-against-russia/faq-russland-sanktionen.html>).

For the reasons given above, the continuation of business of RDG and RNRM and their subsidiaries is crucial to maintain the energy supply in Germany. It is therefore of paramount interest to the Federal Republic of Germany that banks, service providers and business partners of RDG and RNRM and their subsidiaries continue their business relations with these companies in the usual manner and without additional restrictions or changes. The Bundesnetzagentur will employ the rights conferred on it as fiduciary, in particular the exercise of its voting rights from the stakes of RDG and RNRM and the associated right to give instructions, to ensure the orderly conduct of business.

Klaus Müller

President of the Bundesnetzagentur