



Tax slides update

February, 2005

- Retrospective reinterpretation of law
- Selective approach
- Retrospective abolishment of legally obtained tax benefits
- Introduction of a new legal concept by courts, not legislature
- Application of full VAT rate (with fines and penalties) on exports despite 0% legislated rate
- Excessive and inappropriate assets freezing
- Yuganskneftegas auction sale to a “shell” company in a violation of YUKOS Automatic Stay Notice and Temporary Restrain Orders by US Bankruptcy Court and Russian legislation*

** YUKOS considers Yuganskneftegas auction illegal and have not received adequate documentation confirming the sale, the fact of payment and corresponding decrease in outstanding tax claims*



Incremental Tax Assessed on YUKOS for 2000-2003 vs. YUKOS financial performance

(USD million)	<u>2000</u>	<u>2001</u>	<u>2002</u>	<u>2003***</u>	<u>2000-2003</u>
Sales and other operating revenues*	9,032	9,461	11,373	16,265	46,131
Total expenses and taxes*	5,308	6,305	8,315	11,537	31,465
<i>incl. Taxes*</i>	<i>2,453</i>	<i>2,777</i>	<i>3,833</i>	<i>5,647</i>	<i>14,710</i>
<hr style="border-top: 1px dashed black;"/>					
Net income*	3,724	3,156	3,058	4,728	14,666
Operating cash flow*	3,310	3,114	2,967	5,128	14,519
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Incremental taxes	1,713	3,102	4,098	4,017	12,930
Penalty interests, fines, bailiffs fees	2,079	4,089	4,734	3,962	14,864
Total incremental charges	3,792	7,191	8,832	7,979	27,794
(including Yuganskneftegas)	0	2,413	1,163	1,220	4,795
Total tax burden**	6,245	9,968	12,665	13,626	42,504
Total tax burden as % of revenues	69%	105%	111%	84%	92%

RUR data converted to USD using 28 RUR/USD exchange rate, except for USD-based US GAAP numbers

* As per US GAAP, do not include VAT

** Taxes as per US GAAP financial statements plus incremental charges

*** US GAAP data annualized, based on 9m03 US GAAP report

All data on incremental taxes, provided in this presentation is as of Feb 7th, 2005

Tax Claims 2000 - 2003

Incremental Tax Assessed on YUKOS (USD billion)*

	<u>2000</u>	<u>2001</u>	<u>2002</u>	<u>2003</u>	<u>2000-2003</u>
VAT	0.5	1.0	1.3	1.9	4.7
Profits Tax	0.7	0.8	1.9	1.1	4.6
Other	0.5	<0.1	<0.1	<0.1	0.5
Subtotal	1.7	1.7	3.2	3.1	9.8
Penalty interest	1.1	1.0	1.1	0.5	3.8
Fines					
(40% of subtotal for 2000)	0.7	1.4	2.6	2.5	7.1
(80% of subtotal for 2001-2003)					
Claims on subsidiaries	0.0	2.8	1.6	1.6	6.0
(including Yuganskneftegas)**	0.0	2.4	1.3	1.2	4.9
Total (incl. bailiffs fees)	3.8	7.2	8.8	8.0	27.8
Repaid to tax authorities					4.9
Outstanding amounts payable to tax authorities					22.9

*All amounts are rounded and include Yuganskneftegas numbers USD/RUR rate 28.0

Final claims amounts may differ from disclosed amounts, several legal entities tax audits not yet finalized

** YUKOS considers Yuganskneftegas auction illegal and have not received adequate documentation confirming the sale, the fact of payment and corresponding decrease in outstanding tax claims. Yuganskneftegas number includes bailiffs fees.

*** No information available on Yuganskneftegas repayments to tax authorities

Tax Claims 2000 - 2003

Incremental Tax Assessed on YUKOS (RUR billion)*

	<u>2000</u>	<u>2001</u>	<u>2002</u>	<u>2003</u>	<u>2000-2003</u>
VAT	14.0	27.0	35.6	54.0	130.6
Profits Tax	20.0	21.7	54.6	31.9	128.2
Other	13.9	0.2	0.1	0.3	14.5
Subtotal	48.0	48.9	90.3	86.2	273.4
Penalty interest	32.2	27.3	31.5	15.2	106.2
Fines (40% of subtotal for 2000)	19.2	39.1	72.0	68.9	199.3
(80% of subtotal for 2001-2003)					
Claims on subsidiaries	0.0	77.7	45.0	45.9	168.6
(including Yuganskneftegas)**	0.0	67.6	32.6	34.2	134.3
Total (incl. bailiffs fees)	106.2	201.3	247.3	223.4	778.2
Repaid to tax authorities***					138.5
Outstanding amounts payable to tax authorities					639.8

*All amounts are rounded and include Yuganskneftegas numbers

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** YUKOS considers Yuganskneftegas auction illegal and have not received adequate documentation confirming the sale, the fact of payment and corresponding decrease in outstanding tax claims. Yuganskneftegas number includes bailiffs fees

*** No information available on Yuganskneftegas payments to tax authorities

Tax Claims Analytical Breakdown 2000 - 2003

Incremental Tax Assessed on YUKOS (USD billion)

	<u>2000</u>	<u>2001</u>	<u>2002</u>	<u>2003</u>	<u>2000-03</u>
1. Incremental taxes on JSC “NK Yukos” current operations*:	-	-	1.20	0.06	1.26
incl. profit tax on transfers from subsidiaries (§§11, §1, art.251of the Tax Code of the Russian Federation)	-	-	0.66	0.06	0.72
incl. profit tax on proceeds from promissory notes issuance (§§ 10, §§1, art 251 of the Tax Code, art 815 of the Civil Code)	-	-	0.48	0.00	0.49
2. Incremental taxes resulting from summation of trading companies revenues and operations with JSC NK YUKOS ones:	1.71	1.75	2.02	3.01	8.50
incl. trade companies profits tax incentives (regional and local parts)	0.70	0.77	0.76	1.08	3.31
incl. VAT @20% rate on all export revenues of crude and products	0.49	0.97	1.26	1.93	4.65
3. Penalty interest on late payment of incremental taxes	1.15	0.98	1.12	0.54	3.79
4. Fines imposed beyond the boundaries of the state of limitation	0.69	-	-	-	0.69
5. Fines (in doubled amounts for 2001-2003)	-	1.40	2.57	2.46	6.43
6. Bailiffs’ fees	0.24	0.30	0.30	0.25	1.10
7. Total (JSC “NK YUKOS”)	3.79	4.41	7.23	6.34	21.77
8. Incremental taxes on subsidiaries:	-	1.37	0.87	0.94	3.18
incl. Incremental taxes on upstream subsidiaries based on crude realization prices**	-	1.35	0.80	0.76	2.92
incl. Yuganskneftegas	-	1.17	0.61	0.59	2.37
9. Fines, penalties and bailiffs’ fees on subsidiaries	-	1.41	0.73	0.70	2.85
incl. Yuganskneftegas	-	1.24	0.55	0.58	2.37
10. TOTAL (JSC “NK YUKOS”+ subsidiaries)	3.79	7.19	8.83	7.98	27.79

All amounts are rounded and include Yuganskneftegas numbers, USD/RUR rate 28.0

Final claims amounts may differ from disclosed amounts, several legal entities tax audits not yet finalized

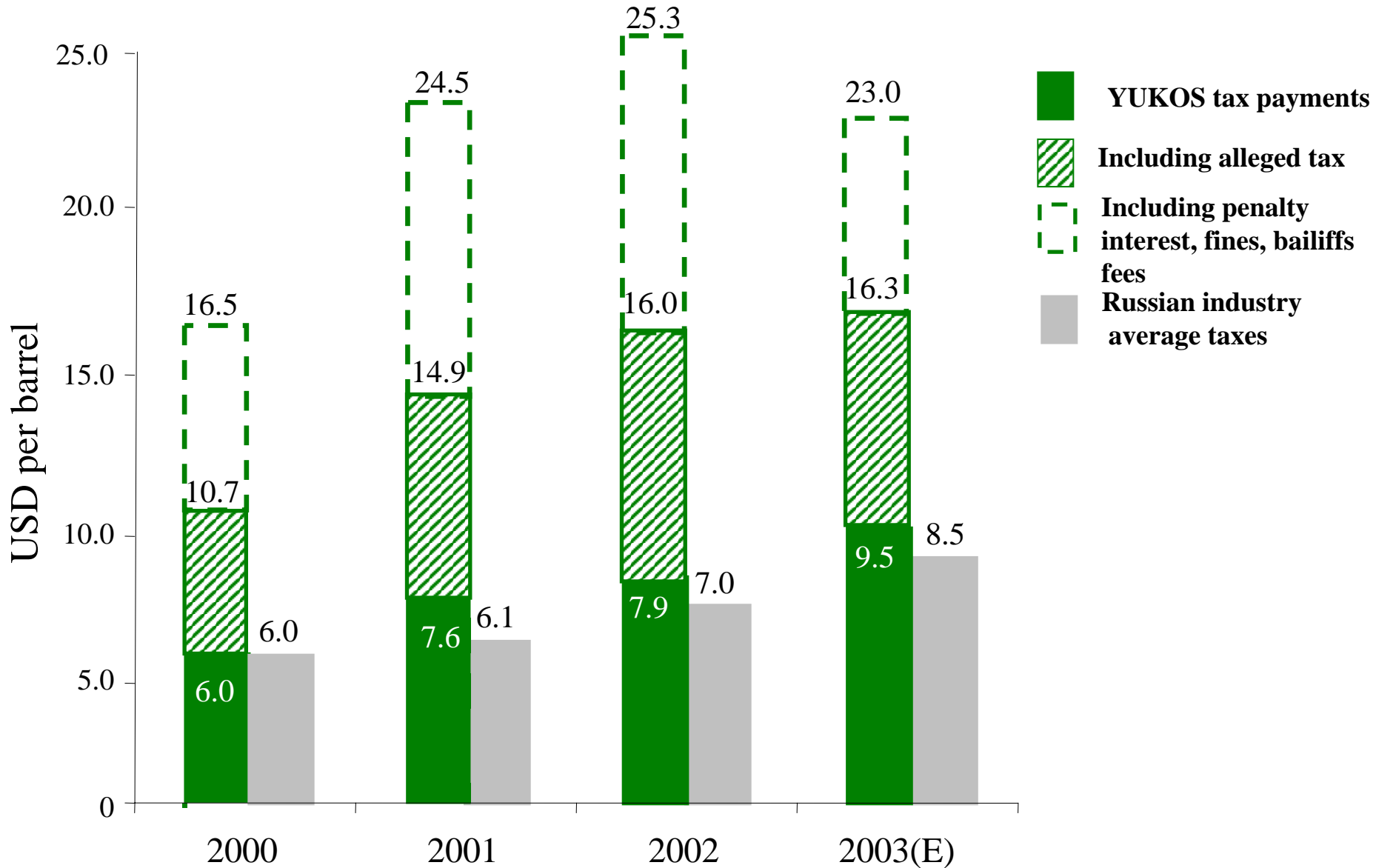
**JSC NK YUKOS is a holding company of YUKOS.*

*** Yuganskneftegas – based on Surgutneftegas realization prices*

Tomskneft – based on Ministry of Energy data on industry-average production profitability

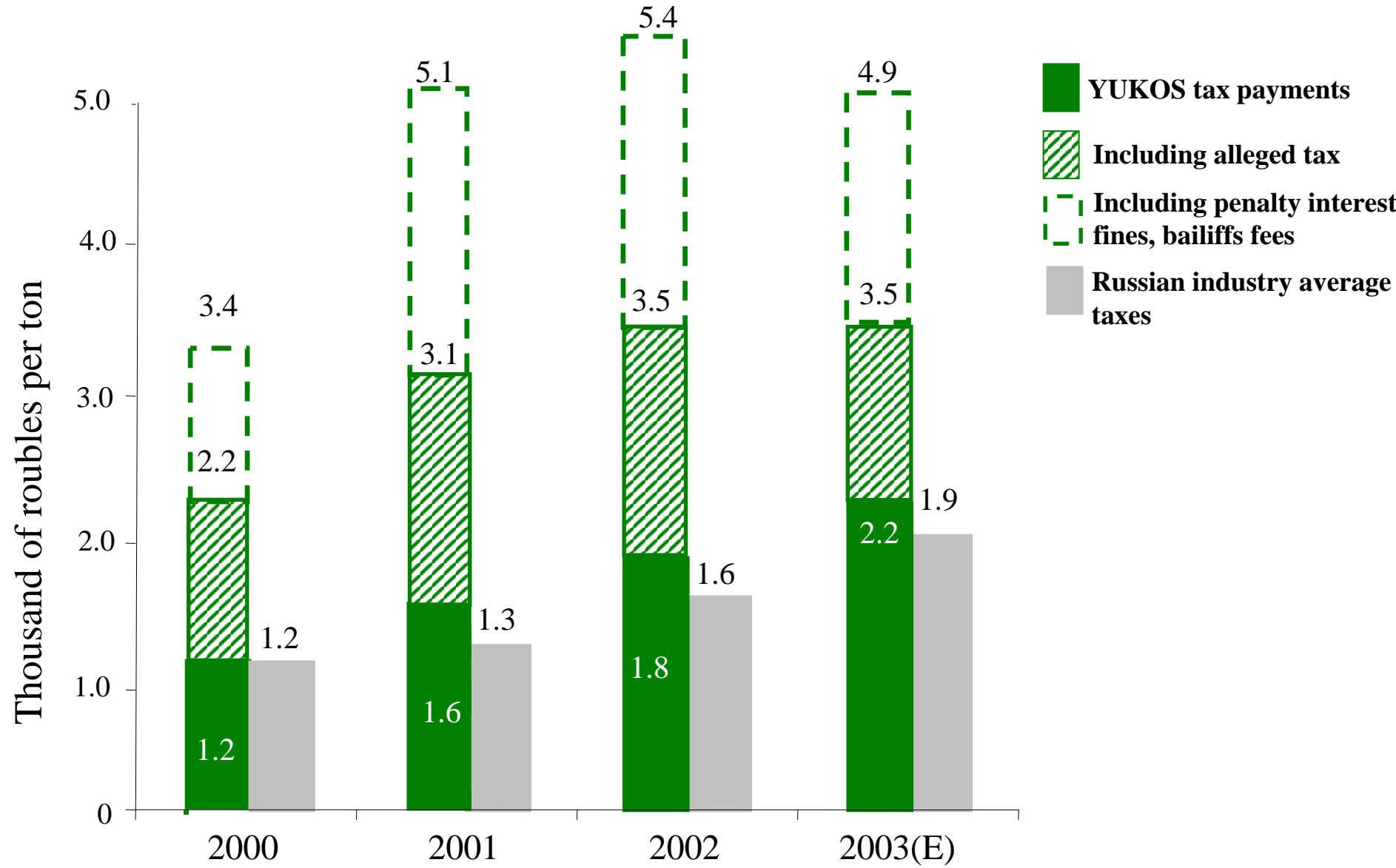
Samaraneftegas – based on a set of selected realization prices in the region

Tax Payments per barrel produced: YUKOS vs. Industry



Industry average: 6 largest Russian companies in Oil & Gas sector, excluding YUKOS

Tax Payments per ton produced: YUKOS vs. Industry



Industry average: 6 largest Russian companies in Oil & Gas sector, excluding YUKOS

Additional information

On December 14th, 2004 Yukos Oil Company filed a voluntary petition for reorganization under Chapter 11 of Title 11 of the United States Bankruptcy Code.

Additional information could be found at:

<http://www.yukosbankruptcy.com>

<http://www.yukos.com/taxes.asp>