

APPROVED BY
the Board of Directors
of PJSC ROSSETI Moscow Region
(Protocol No. 443 of 30.07.2020)

REGULATION
on Insider Information of PJSC Rosseti Moscow Region
(new edition)

Moscow, 2019

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1. General Provisions

1.1. This Regulation on Insider Information (hereinafter referred to as the "**Regulation**") is an internal document of PJSC ROSSETI Moscow Region (hereinafter referred to as the Company) and has been developed in accordance with the requirements of Federal Law No. 224 - FZ of 27.07.2010 "On Countering the Misuse of Insider Information and Market Manipulation and on Amendments to Certain Legislative Acts of the Russian Federation", regulations of the Bank of Russia, other subordinate regulatory legal acts, and the Company's Charter.

1.2. The purposes of this Regulation are:

- the Company's compliance with the requirements of the legislation of the Russian Federation on countering the misuse of insider information and market manipulation;
- protection of the rights and property interests of the Company's shareholders and other owners of the Company's securities;
- protecting the Company's reputation and increasing the level of trust in the Company on the part of shareholders, potential investors, creditors, partners, professional participants in the securities market, government agencies and other interested parties; ensuring the Company's economic security;
- control over compliance with this Regulation by persons admitted to the Company's insider information;
- establishment of general rules for the protection of information constituting the Company's insider information;
- prevention of manipulation of prices for insider financial instruments

1.3. Basic concepts, definitions and abbreviations used in this Regulation:

The Law - Federal Law of July 27, 2010 №224-FZ "On measures to counteract the misuse of insider information and market manipulation and to change certain legislative acts of the Russian Federation";

Closed period - the period during which it is recommended to refrain from making transactions with insider financial instruments;

Insider information - accurate and specific information that has not been disseminated (including information that constitutes commercial, official secrets, banking secrets, communication secrets (in terms of information about postal money transfers) and other legally protected secrets) and the dissemination of which may have a significant impact on the prices of financial instruments, foreign currency and (or) goods (including information related to one or more issuers of equity securities (hereinafter - the issuer), one or more management companies of investment funds, mutual funds and non - state pension funds (hereinafter-the issuer). management company) or one or more financial instruments, foreign currency and (or) goods and which relates to information included in the list of insider information approved by the Company;

Market manipulation - intentional actions that are defined by the legislation

of the Russian Federation on countering the misuse of insider information and market manipulation or regulations of the Bank of Russia, as a result of which the price, demand, supply or volume of trading in a financial instrument, foreign currency and (or) goods deviated from or were maintained at a level significantly different from the level that would have been formed without such actions;

The Company is Public Joint Stock Company Rosseti Moscow Region (abbreviated name - PJSC Rosseti Moscow Region).

Transactions with financial instruments, foreign currency and (or) goods (hereinafter - transactions) - operations and other actions aimed at acquiring, alienating, or otherwise changing the rights to financial instruments, foreign currency and (or) goods, as well as actions related to the acceptance of obligations to perform these actions, including the issuance of applications (giving orders) and the cancellation of such applications;

Disclosure of insider information - providing access to information to all interested parties, regardless of the purpose of obtaining this information, in accordance with the procedure that guarantees its location and receipt.

Dissemination of information -actions:

- aimed at obtaining information by an indefinite circle of persons or at transmitting information to an indefinite circle of persons, including by disclosing it in accordance with the legislation of the Russian Federation on securities;
- related to the publication of information in the mass media, including electronic, information and telecommunications networks, access to which is not restricted to a certain number of persons (including the information and telecommunications network "Internet");
- related to the dissemination of information through electronic, information and telecommunications networks, access to which is not limited to a certain number of persons (including the information and telecommunications network "Internet");

Financial instruments - securities or derivative financial instruments defined in accordance with Federal Law No. 39 - FZ of 22.04.1996 "On the Securities Market".

2. Insider Information

2.1. The Company's insider information includes information, the list of which is approved by the regulatory act of the Bank of Russia and information defined by the Company as insider information.

2.2. The list of the Company's insider information is approved by the General Director.

2.3. The list of the Company's insider information is a public document and is subject to mandatory disclosure on the Company's website at: http://www.rossetimr.ru/invest_news/informatsiya-dlya-insayderov within 3 (three)

business days from the date of its approval and (or) making changes or additions to it.

2.4. Information not related to insider information:

- information that has become available to an unlimited number of people, including as a result of their dissemination;
- studies, forecasts and estimates made on the basis of publicly available information in relation to the Company's financial instruments and (or) goods, as well as recommendations and (or) proposals for conducting transactions with the Company's financial instruments and (or) goods;
- information and (or) information based on it, which is transmitted by the issuer and (or) a person attracted by it (persons attracted by it) to potential purchasers or used by the issuer and (or) a person attracted by it (persons attracted by it) to give recommendations or otherwise encourage potential purchasers to purchase relevant securities in connection with the placement (organization of placement) and (or) offer (organization of offer) in the Russian Federation or abroad of the issuer's equity securities, including through the placement of securities of a foreign issuer certifying the rights in respect of the issuer's equity securities, provided that potential purchasers are notified that such information (information) may be used by them solely for the purpose of making a decision on the acquisition of the securities being placed (offered).

3. Procedure and terms of disclosure of insider information

3.1. The Company's insider information is disclosed in accordance with the procedure and terms established by the legislation of the Russian Federation for the disclosure of insider information of the persons specified in the Law.

3.2. The following insider information is not subject to disclosure:

on decisions taken by the board of directors on issues within its competence in accordance with the charter, if such information is classified as confidential information/commercial secret in accordance with the established procedure, with the exception of information on decisions taken by the board of directors on issues within its competence in accordance with federal laws;

on the terms of the agreement on the maintenance (stabilization) of prices for the Issuer's equity securities (securities of a foreign issuer certifying rights in respect of the Russian issuer's equity securities), except for the term of the said agreement.

4. List of insiders

4.1. The Company maintains a list of insiders in accordance with the requirements of the Law.

4.2. The list of insiders of the Company includes the following persons:

- General Director (person performing the functions of sole executive body) of the Company;
- members of the Management Board of the Company;

- members of the Board of Directors of the Company;
- members of the Audit Commission of the Company;
- heads of branches and representative offices of the Company;
- Deputy General Directors of the Company;
- chief advisers / advisors to the Company;
- heads of the Company's structural divisions
- employees of the Company who have access to insider information information on the basis of labor and (or) civil law contracts;
- information agencies that carry out disclosure of information;
- persons who assign ratings to the Company;
- persons who have access to insider information on the basis of contracts concluded with the Company (including auditors, appraisers, professional participants in the securities market, credit and insurance organizations).

4.3. The Company notifies the persons included in the list of insiders about their inclusion in such a list and exclusion from it in accordance with the Law.

4.4. The Company has the right to request information from insiders included in the list of insiders of the Company about their transactions with securities related to insider financial instruments, and about the conclusion of contracts that are derivative financial instruments, and the price of which depends on such securities.

4.5. Persons included in the list of insiders of the Company are responsible for the illegal use of insider information, market manipulation and violation of the requirements of the legislation on countering the illegal use of insider information and market manipulation in accordance with the legislation of the Russian Federation.

4.6. The commission of transactions with insider financial instruments by individuals included in the list of insiders of the Company, as well as persons associated with them, in violation of the terms of such transactions defined in Section 5 of this Regulation, is the basis for bringing these persons to civil and (or) other types of liability.

5. Conditions for transactions with insider financial instruments

5.1. Insiders should refrain from making any transactions with insider financial instruments during closed periods.

5.2. The closed period begins no later than 15 calendar days before the signing of the accounting (financial) statements prepared in accordance with the Russian Accounting (Financial) Reporting Standards (RAS) and the consolidated financial statements prepared in accordance with International Financial Reporting Standards (IFRS), and ends on the day following the day of publication of these statements.

5.3. At the beginning of the calendar year, the Company informs insiders about closed periods by posting relevant information on the Company's official

website on the Internet.

6. Monitoring compliance with legislation in the field of insider information

6.1. Control over compliance with the requirements of the Law and the regulations adopted in accordance with it is carried out by a structural unit (official) defined by the Company's organizational documents.

6.2. The structural unit (official) responsible for monitoring compliance with the requirements of the Law and the regulations adopted in accordance with it is accountable to the General Director.

6.3. The structural unit (official) responsible for monitoring compliance with the requirements of the Law and the regulations adopted in accordance with it annually, no later than 90 days from the end of the reporting year, sends the General Director a report on compliance with the requirements of the legislation on the control of insider information in the Company.

6.4. Monitoring compliance with legislation in the field of insider information includes:

- identification of information related to insider information and its inclusion in the list of insider information of the Company;
- control of the completeness and relevance of the List of the Company's insider Information;
- control of disclosure of the List of the Company's insider Information on the Company's official website on the Internet;
- monitoring the management of the list of insiders;
- control over notification of insiders about their inclusion (exclusion) in the list;
- control over the execution of the obligation to send the list of insiders to the trade organizers and the Bank of Russia in accordance with the legislation;
- control over the compliance of the Company's structural divisions dealing with insider information with the requirements of the legislation and local regulations of the Company in the field of countering the illegal use of insider information and market manipulation;
- control over the procedure and terms of disclosure and provision of insider information;
- advising the Company's employees on issues related to the application of legislation in the field of countering the misuse of insider information and market manipulation, as well as local regulations of the Company in this area;
- development of the Company's local regulations on countering the misuse of insider information and market manipulation;
- control of compliance of the Company's internal documents with the requirements of the legislation in the field of countering the illegal use of insider information and market manipulation.

7. Final provisions

7.1. Approval of this Regulation, as well as amendments and additions to it, is carried out by a decision of the Company's Board of Directors.

7.2. In the event of amendments to the legislation of the Russian Federation in the field of countering the misuse of insider information, this Regulation will apply to the extent that it does not contradict the legislation of the Russian Federation.

7.3. The invalidity of certain provisions of this Regulation does not entail the recognition of the invalidity of other provisions or the Regulation as a whole.

7.4. Control over the implementation of this Provision is carried out by the General Director of the Company.