

APPROVED
by Decision of the Board of Directors
PJSC Rosseti Moscow Region
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**Anti-Corruption Policy of PJSC Rosseti Moscow Region and
Subsidiaries of PJSC Rosseti Moscow Region**

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1. General Provisions

1.1. The Anti-Corruption Policy of Public Joint Stock Company Rosseti Moscow Region and subsidiaries of Public Joint Stock Company Rosseti Moscow Region (hereinafter, Anti-Corruption Policy) was developed on the basis of a single fundamental document - the Anti-Corruption Policy of Public Joint Stock Company Federal Grid Company - Rosseti and subsidiaries of Public Joint Stock Company Federal Grid Company - Rosseti approved by a resolution of the Board of Directors of Public Joint Stock Company Federal Grid Company - Rosseti (Minutes No. 620 of 07.06.2023), which defines the goals, objectives, principles, and measures for preventing and combating corruption in the Rosseti Group of Companies.

1.2. In accordance with the requirements of Article 13.3 of the Federal Law No. 273-FZ of 25.12.2008 'On Combating Corruption' (hereinafter, Anti-Corruption Law), the Anti-Corruption Policy defines corruption prevention measures at PJSC Rosseti Moscow Region (hereinafter, the Company) and subsidiaries of PJSC Rosseti Moscow Region (hereinafter, SA), i.e. identification of units or officials responsible for preventing corruption and other offenses; procedures for cooperation with law enforcement authorities; development and implementation of standards and procedures to ensure honest and dedicated work; adoption of a code of ethics and official conduct for employees; prevention and settlement of conflicts of interest; prevention of unofficial reporting and use of forged documents.

1.3. The Company and the Company's SAs shall actively implement standards and procedures to ensure honest and dedicated work.

1.4. The Company and the Company's SAs shall follow anti-corruption standards aimed at open, responsible, and honest performance of activities stipulated by the Articles of Association of the Company and the Company's SAs, minimization of corruption offenses in the electric grid sector that affect consumer confidence and the business reputation of the Company and the Company's subsidiaries and affiliates.

1.5. The list of regulatory legal acts of the Russian Federation, on the basis of which the Company's Anti-Corruption Policy and the Company's SAs have been developed, can be found in Annex 1, which is an integral part of this Anti-Corruption Policy.

1.6. The Company and the Company's SAs shall ensure publicity of their anti-corruption measures, post on the Company's official website and official websites of the Company's SAs documents and information on anti-corruption issues, including anti-corruption policies and codes of ethics and official behavior of the Company's and SA's employees.

2. Terms and Definitions

2.1. The terms and definitions used in this Anti-Corruption Policy are set out in Annex 2, which is an integral part of this Anti-Corruption Policy.

2.2. In the event of a conflict between a regulatory legal act of the Russian Federation in the field of anti-corruption, as a result of amendments made thereto, and the definition of a term or other provision given in this Anti-Corruption Policy, the provisions of the relevant regulatory legal act of the Russian Federation shall be the applicable definition (norm).

3. Principles, Goals and Objectives of the Anti-Corruption Policy

3.1. Principles of the Anti-Corruption Policy:

- **compliance of** the Anti-Corruption Policy with applicable anti-corruption legislation and generally accepted norms;
- **observance of** legitimate rights and interests of stakeholders, employees of the Company and the SA's, protection of business reputation of the Company and the Company's SAs, partners and other stakeholders, confidentiality regime in the course of anti-corruption activities;
- personal example of leadership in the formation of a culture of intolerance to corruption and the creation of an internal system for preventing and combatting corruption;
- building a risk management and internal control process to prevent and combat corruption within the framework of the Company and the Company's SAs unified risk management and internal control system;
- employee involvement: awareness of the Company's and SA's employees of the anti-corruption law provisions and their active participation in the formation and implementation of anti-corruption standards and procedures in the Company and the Company's SAs;
- proportionality of anti-corruption procedures to the amount of possible damage in case of realization of a corruption risk;
- effectiveness of anti-corruption procedures: implementation of anti-corruption measures that ensure ease of implementation and bring significant results;
- responsibility and inevitability of punishment for the Company's and SA's employees regardless of their position, length of service and other conditions in case they commit corruption offenses;
- openness in carrying out activities stipulated by the Articles of Association of PJSC Rosseti Moscow Region and the Company's SAs: informing partners, counterparties, and the public about anti-corruption measures taken by the Company and the Company's SAs;
- continuous control and regular monitoring of the effectiveness of the implemented anti-corruption procedures.

3.2. Goals of Anti-Corruption Policy

The main goal of the Company's Anti-Corruption Policy and the Company's SAs is a unified compliance approach with the requirements of Article 13.3 of the Law on Combating Corruption and other regulatory legal acts of the Russian Federation in the field of combating corruption, development and adoption of measures to prevent and combat corruption, such as identification and subsequent elimination of the causes of corruption (prevention of corruption); identification, prevention and suppression of corruption and other offenses; minimization and/or elimination of the consequences of corruption and other offenses, reducing the risks of bringing the Company and the Company's SAs to responsibility, for example, under Article 19.28 of the Code of Administrative Offences of the Russian Federation (hereinafter, CoAO); or bringing the Company and the Company's SAs to responsibility under Article 290 'Bribery Taking' of the Criminal Code of the Russian Federation (hereinafter, CC of RF), Article 291 'Giving Bribe' of the CC of RF, or Article 291.1 'Mediation in Bribery' of the CC of RF, as well as any other liability provided for by the legislation of the Russian Federation for corruption offenses.

The Anti-Corruption Policy is aimed at implementing the requirements of the Corporate Governance Code of the Company, including, but not limited to, the definition of measures to form elements of corporate culture, organizational structure, rules and procedures to prevent corruption, assessing the reliability of procedures to counteract illegal actions, abuse and corruption, as well as verifying compliance of the Company's

and SA's employees with the provisions of the legislation of the Russian Federation and local regulations of the Company and the Company's SAs relating to confidential information, anti-corruption, compliance with the requirements of the Code of Corporate Ethics and Official Conduct of the Company's Employees and Codes of Corporate Ethics and Official Conduct of Employees of the Company's SAs.

3.3. Objectives of Anti-Corruption Policy:

3.3.1. identification of key areas to fulfill the requirements of Article 13.3 of the Law on Combating Corruption and other regulatory legal acts of the Russian Federation in the field of combating corruption;

3.3.2. development and implementation of measures to implement the National Anti-Corruption Plan approved by the relevant Decree of the President of the Russian Federation, Minutes of the Commission under the President of the Russian Federation on the strategy for the development of the fuel and energy complex and environmental safety No. A-60-26-8 of July 10, 2013;

instructions of the Government of the Russian Federation No. VP-P13-9308 of December 28, 2011 and No. VP-P24-1269 of March 5, 2012 and any other instructions of the Government of the Russian Federation and the shareholder represented by the Russian Federation, as well as guidelines of the Ministry of Labor of the Russian Federation in the field of combating corruption;

3.3.3. development and implementation of effective mechanisms for implementing measures to prevent and combat corruption, including an anti-corruption action plan;

3.3.4. identification, assessment and description of corruption risks, development of procedures for their minimization, monitoring of the effectiveness of measures;

3.3.5. formation of responsibility for their actions and behavior among the Company's and SA's employees;

3.3.6. formation among members of the management and control bodies of the Company and management and control bodies of the Company's SAs, employees of the Company and the Company's SAs, partners and contractors, of a clear understanding of the position of the Company and the Company's SAs on rejection of corruption in all forms and manifestations;

3.3.7. minimization of risks of involvement of the Company's and SA's employees in activities related to corruption offenses.

4. Key Measures to Prevent Corruption in the Company and the Company's SAs:

4.1. determine functions and tasks of the Company's structural subdivisions and structural subdivisions of the Company's SAs responsible for prevention of corruption offenses, anti-corruption, and compliance control;

4.2. develop and implement a set of standards and procedures aimed at ensuring fair and dedicated work;

4.3. familiarize the Company's and SA's employees with the Codes of Ethics and Official Conduct of the Company's and SA's employees;

4.4. identification and assessment of corruption risks in accordance with the Company's local normative acts and local normative acts of the Company's SAs;

4.5. development of procedures to minimize identified corruption risks together with corruption risk owners;

4.6. identification and settlement of conflicts of interest;

4.7. development of control procedures to minimize the risk of bringing the Company

or the Company's SAs to responsibility under Article 19.28 of the CoAO;

4.8. cooperation with law enforcement agencies in the field of anti-corruption, reporting of detected offenses, assistance in inspections;

4.9. establishing control procedures to prevent cases of unofficial reporting and use of forged documents.

5. Persons Covered by Anti-Corruption Policy and Their General Responsibilities

5.1. Persons subject to this Anti-Corruption Policy are the management and control bodies of the Company and the management and control bodies of the Company's SAs, employees of the Company and the Company's SAs, regardless of their position and functions, as well as partners and counterparties of the Company and/or the Company's SAs, any other persons by virtue of mutual obligations between them and the Company and the Company's SAs, including 'anti-corruption obligations' and other 'anti-corruption agreements'.

5.2. General duties of the Company's management and control bodies, management and control bodies of the Company's SAs, the Company's and SA's employees:

5.2.1. Management and control bodies of the Company, management and control bodies of the Company's SAs, employees of the Company and the Company's SAs shall:

- refrain from behavior that could be interpreted by others as a willingness to give or receive a bribe, offer or promise to mediate in giving or receiving a bribe, including on behalf of or in the interests of the Company and/or the Company's SAs;

- refrain from receiving business gifts from partners and counterparties of the Company and/or the Company's SAs, including transfer of business gifts to other employees of the Company and the Company's SAs, with the exception of business gifts received by an employee in connection with protocol events, business trips, other official events and other cases established by federal laws and other regulatory legal acts determining the peculiarities of the legal status and specifics of the employee's labor activity.

- inform the Company's structural unit and/or structural unit of the Company's SA responsible for prevention of corruption offenses, anti-corruption, compliance control about cases of inducement to commit corruption offenses;

- inform the Company's structural unit and/or structural unit of the Company's SAs responsible for prevention of corruption offenses, anti-corruption, and compliance control about conflict of interest or risk of conflict of interest, about the fact of committing a corruption offense by other employees of the Company and/or the Company's SAs, partners, counterparties and counterparties' employees of the Company and/or the Company's SAs or other persons.

5.3. Partners and counterparties of the Company and the Company's SAs have been informed that they:

- fulfill the requirements of the anti-corruption clause, other anti-corruption obligations and agreements contained in the contracts concluded between the Company or the Company's SAs and partners, counterparties of the Company or the Company's SAs;

- comply with the Anti-Corruption Procurement Standard, which is annexed to the Unified Procurement Standard of PJSC Rosseti (Procurement Regulations), provide the information and documents required by the Company and the Company's SAs (information regarding the entire chain of ownership down to an individual, consent to the processing of personal data, and other information);

- refrain from committing or participating in the commission of corruption offenses, demonstrate behavior that may be interpreted as a willingness to give or receive a bribe, be an intermediary in giving or receiving a bribe.

5.4. The Company and the Company's SAs recommend the Company's partners and counterparties to report to the Company or the Company's SAs in case of inducement to give or receive a bribe or mediation in giving or receiving a bribe.

5.5 The Company and the Company's SAs recommend that partners and counterparties refrain from giving business gifts to the Company's management bodies and the Company's SAs, the Company's and SA's employees.

6. Anti-Corruption Policy Implementation Mechanism

6.1. Determination of functions and tasks of units and officials responsible for prevention of corruption offenses and prevention of corruption

6.1.1. The Board of Directors of the Company and the boards of directors of the Company's SAs, the executive bodies of the Company, in accordance with the Articles of Association of PJSC Rosseti Moscow Region, and sole executive bodies of the Company's SAs, in accordance with the respective Articles of Association of the Company's SAs, the First Deputy General Director for Corporate Protection and Anti-Corruption, the Company's subdivision and structural units of the Company's SAs responsible for prevention of corruption offenses, anti-corruption, and compliance control shall ensure compliance with the work of the Board of Directors of the Company and the Board of Directors of the Company's SAs.

6.1.2. The Board of Directors of the Company and the Boards of Directors of the Company's SAs:

- determine key strategic areas of the Anti-Corruption Policy; The Company's Board of Directors approves the Company's Anti-Corruption Policy, the Company's SAs Anti-Corruption Policy based on the Company's Anti-Corruption Policy through a resolution of the Boards of Directors of the Company's SAs;

- control the results of the implementation of the Anti-Corruption Policy;
- exercise general control over the implementation, discipline of execution and operational efficiency of the Anti-Corruption Policy measures.

6.1.3. Executive bodies of the Company and sole executive bodies of the Company's SAs:

- are responsible for organizing all activities aimed at implementing the principles and requirements of the Anti-Corruption Policy, including appointment of the Company's and SA's officials responsible for implementing the anti-corruption policy in the Rosseti Moscow Region Group of Companies, prevention of corruption offenses, combating corruption, and compliance control;
- vest the Company's subdivision and structural subdivisions of the Company's SAs responsible for prevention of corruption offenses, anti-corruption, and compliance control with powers sufficient for anti-corruption measures in the Company and the Company's SAs, including with respect to persons holding managerial positions in the Company and the Company's SAs, provide the necessary human and technical resources;
- approve the register of corruption risks, the list of owners of corruption risks, and review the report on minimization of corruption risks;
- ensure annual review by the Company's Board of Directors and the Boards of Directors of the Company's SAs of reports on compliance with this Anti-Corruption Policy and reports on compliance with anti-corruption policies of the Company's SAs (report on the results of anti-corruption monitoring).

6.1.4. In accordance with the Strategy of the Electric Grid Sector of the Russian Federation, the structural subdivision of the Company responsible for prevention of corruption offenses and anti-corruption is the center of coordination and control over the activities of the Company's SAs in the field of prevention and combating corruption.

6.1.5. The Company's structural unit responsible for preventing corruption offenses, combating corruption, and compliance control participates in organizing annual seminars and meetings on improving anti-corruption activities at Rosseti Group of Companies.

6.1.6. Structural subdivisions of the Company and the Company's SAs responsible for prevention of corruption offenses, anti-corruption, and compliance control:

- form and implement in the Company and the Company's SAs a unified methodology in the field of Anti-Corruption Policy implementation aimed at preventing, detecting and suppressing corruption offenses, as well as minimizing corruption and reputational risks;
- conduct activities aimed at implementing the principles and requirements of Anti-Corruption Policy;
- develop and revise the Anti-Corruption Action Plan;
- exercise compliance control over the Company's activities and the Company's SAs in the field of anti-corruption;
- conduct control measures aimed at detecting corruption and other offenses;
- exercise anti-corruption control over the Company's procurement activities and the Company's SAs;
- organize reception and review of applications from applicants (employees, counterparties of the Company and the Company's SAs, other individuals and legal entities) about possible facts of corruption and fraud received through the anti-corruption hotline;
- organize measures to manage conflicts of interest and internal ethical requirements in the Company and the Company's SAs, as well as:

- organize the completion and review of conflict of interest declarations;
- organize verification of information on property, income and property obligations of persons defined by local normative acts of the Company and local normative acts of the Company's SAs on provision of such information, their spouses and minor children, for the purpose of reliability, identification of affiliation signs, conflict of interest, pre-conflict situation and other abuses related to positions held in the Company;
- organize inspections of the employees accepted to the Company and the Company's SAs with regard to the authenticity of the documents submitted at the time of employment and the presence of compromising information in respect thereof;
- organize training events on corruption prevention and combating, as well as individual counseling of employees;
- organize improvement of the effectiveness of awareness-raising and educational measures aimed at creating an atmosphere of intolerance to corruption offences in the Company;
- provide assistance to authorized representatives of control and law enforcement authorities of the Russian Federation when they conduct inspections of the Company's activities and/or the Company's SAs on issues related to corruption prevention and combating;
- provide assistance to authorized representatives of law enforcement agencies of the Russian Federation in carrying out measures to suppress or investigate corruption offenses, including operational-search activities;
- prepare reports on the implementation of anti-corruption policies and anti-corruption action plans (Anti-Corruption Monitoring);
- develop and implement anti-corruption standards;
- provide methodological assistance in the implementation of anti-corruption and corruption prevention measures and legal education of employees;
- exchange experience between the Company's and SA's structural subdivisions in order to increase the efficiency of anti-corruption and corruption prevention measures and legal education of employees;
- coordinate the activities of structural divisions in the implementation of Anti-Corruption Policy;
- participate in holding summits, scientific and practical seminars, conferences on the Russian and international level in the sphere of combating and preventing corruption;
- interact with state and local government bodies, scientific and educational organizations and institutions in the sphere of combating and preventing corruption;
- organize and monitor the implementation of the Russian, applicable foreign and international anti-corruption legislation and monitor changes made thereto as well as relevant judicial practice;
- conduct scheduled and unscheduled inspections of compliance with the principles of this Anti-Corruption Policy, make reports on the results of inspections;
- develop documents in the field of combating and preventing corruption and initiate the updating of documents in connection with changes in the legislation of the Russian Federation in the field of combating corruption.

6.1.7. The Company's Corporate Ethics and Conflict of Interest Commission is a collegial body of PJSC Rosseti Moscow Region, which:

- reviews issues related to settlement of pre/conflict of interests in the Company, compliance with the provisions of the Anti-Corruption Policy, the Code of Corporate Ethics and Official Conduct of the Company's employees;

- considers issues related to observance of corporate ethics and settlement of conflicts of interests of employees of the Company's SAs.

6.1.8. Commissions for compliance with corporate ethics and settlement of conflicts of interest are collegial bodies of the Company's SAs, which:

- review issues related to settlement of pre/conflict interests in the Company's SAs, compliance with the provisions of this Anti-Corruption Policy, Codes of Corporate Ethics and Official Conduct of employees of the Company's SAs.

6.2. Organization of the process of corruption risk management and internal control in the Company and the Company's SAs

6.2.1. The corruption risk management process is organized in accordance with the Company's local regulations and local regulations of the Company's SAs in the field of risk management and internal control.

6.2.2. The Company and the Company's SAs have defined lists of positions with high corruption risk, owners of corruption risks of the Company and owners of corruption risks of the Company's SAs, a list (register) of corruption risks, passports and maps of corruption risks, control matrices for corruption risk management and control procedures for business processes of the Company and the Company's SAs.

6.3. Preventing and Resolving Conflicts of Interest

In order to manage the risk of conflict of interest, influence of personal interest of the Company's and SA's employees on their job duties and business decisions, the Company and the Company's SAs shall take measures to identify, prevent and settle conflicts of interest, as well as:

6.3.1. Develop and adopt local normative acts establishing the procedure for identification and settlement of situations of pre/conflict of interests that may arise among the Company's and SA's employees in the course of performance of their functions and job duties.

6.3.2. Inform all employees of the Company and the Company's SAs of the local regulatory acts adopted by the Company and the Company's SAs in the area of conflict of interest management.

6.3.3. Apply the following principles in identifying and resolving conflicts of interest:

- mandatory disclosure of information about a real or potential conflict of interest;
- individual consideration and assessment of corruption and reputational risk factors when identifying each conflict of interest, and its resolution;
- confidentiality of the conflict of interest disclosure and resolution process;
- observing the balance of interests of the Company and the Company's SAs, as well as their employees, when resolving conflicts of interest;
- protection of rights of the Company's and SA's employee in connection with a conflict of interest that was timely disclosed by the Company's employee or the Company's SA and settled (prevented) by the Company or the Company's SA.

6.3.4. Establish responsibilities for the Company's and SA's employees who shall:

- follow the interests of the Company and the Company's SAs when making decisions on business matters and performing their official duties;
- avoid situations and circumstances that may lead to a conflict of interest;
- disclose any (real) or potential conflict of interest, including reporting the occurrence of a conflict of interest and filling out declarations of conflict of interest;
- contribute to resolving of an existing conflict of interest.

6.3.5. Establish different types of conflict of interest disclosure: upon hiring, upon appointment to a new position, as conflict of interest situations arise, during annual conflict of interest declarations.

- 6.3.6. Ensure mandatory completion of conflict of interest declarations.
- 6.3.7. Identify persons responsible for receiving conflict of interest disclosures.
- 6.3.8. Establish a prohibition on entering into contracts/agreements with persons who are found to have a conflict of interest, affiliation or other abuse of power or authority.
- 6.3.9. Establish ways of resolving a conflict of interest.
- 6.3.10. Determine typical situations of pre/conflict of interest.
- 6.3.11. Ensure the functioning of commissions controlling the compliance with corporate ethics and conflict of interest resolution.

6.4. Development and implementation of standards and procedures aimed at ensuring fair work in the Company's and the Company's SA operations

The Company and the Company's SAs are interested in the fair and dedicated work and ethical behavior of the Company's and SA's employees, and to this end they:

6.4.1. Develop and implement codes of ethics and official conduct for the Company's and SA's employees, which are designed to define:

- common values and principles of the Company and the Company's SAs;
- specific rules and standards of behavior of the Company's and SA's employees aimed at forming ethical and conscientious behavior thereof.

6.4.2. Verify information on income, property and property-related obligations in respect of citizens applying for positions subject to declaration and employees holding such positions in the Company and the Company's SAs, as well as their close relatives, in accordance with internal organizational and administrative documents of the Company and the Company's SAs in order to identify conflicts of interest, facts of affiliation and other abuses.

6.4.3. Conduct background checks on citizens being hired or with whom civil law contracts should be concluded in order to minimize the risk of prosecution under Article 19.29 of the Code of Administrative Offences.

6.4.4. Apply the principles of honesty and impartiality in the formation of personnel (including management) staff:

- employees of the Company and the Company's SAs shall be appointed or transferred to higher positions based on their business qualities, competence, and experience only;

- a ban shall be introduced on employment of persons of close kinship, provided that the performance of official duties is related to the direct subordination or control of one of them to the other;

- employees who are next of kin, or legally related to each other, or in a relationship of direct subordination or control, shall be allowed in exceptional cases by decisions of the Company's Commission for Compliance with Corporate Ethics and Settlement of Conflicts of Interest;

- labor dynasties are welcomed in the Company and the Company's SAs. Situations related to direct/indirect subordination of production personnel to close relatives, whose employment may be referred to labor dynasties, shall be recognized as resolved by decisions of the Company's Commission for Compliance with Corporate Ethics and Settlement of Conflicts of Interest / Commission for Compliance with Corporate Ethics and Settlement of Conflicts of Interest of the Company's SAs, provided that the conditions for inclusion in a labor dynasty are satisfied;

- certain employees of the Company and the Company's SAs shall be obliged to provide information specified in clause 6.4.2 of the Anti-Corruption Policy.

6.4.5. Establish in the local regulatory acts of the Company and the Company's SAs the rules for exchanging business gifts with partners and counterparties that comply with the requirements of the legislation of the Russian Federation and do not create a business reputation risk for the Company and the Company's SAs, employees of the Company and the Company's SAs.

6.4.6. Impose an obligation on employees of the Company and the Company's SAs to inform about any and all cases of receiving business gifts thereby.

6.4.7. Impose a ban on giving/receiving business gifts by employees of the Company and the Company's SAs in accordance with the laws of the Russian Federation and local regulations of the Company and the Company's SAs.

6.4.8. Determine and approve composition of the Company's collegial working bodies and those of the Company's SAs for the purpose of anti-corruption control of procurement activities.

6.4.9. Implement control procedures to counteract the misuse of insider information and market manipulation.

6.4.10. Ensure anti-corruption examination of local regulatory acts of the Company and the Company's SAs, as well as draft regulatory legal acts of the Russian Federation within the frame of their competence.

6.4.11. Exercise control over accounting indicators, availability and reliability of primary documents, including, but not limited to, accounting and write-off of receivables, reasonableness of expenses, periods of adjustment, availability and reliability of primary documents, etc.

6.4.12. In case of charitable or sponsorship activities, they shall act on the basis of the principle of transparency, shall not pursue the goal of gaining or maintaining an advantage in the commercial activities of the Company and the Company's SAs, in accordance with the requirements of the legislation of the Russian Federation and local regulatory acts of the Company and the Company's SAs.

6.5. Formation of the fundamentals of law-abiding behavior of the employees and legal education

6.5.1. The Company and the Company's SAs shall carry out informational and-educational activities for their employees to prevent corruption, and to this end they should:

- provide access to this Anti-Corruption Policy and other local regulations of the Company and the Company's SAs related to any anti-corruption issues;
- create and improve anti-corruption policy sections on the official websites of the Company and the Company's SAs;
- place information about the measures implemented under this Anti-Corruption Policy in corporate media and mass media;
- in cooperation with mass media, ensure dissemination of positive experience of employees of the Company and the Company's SAs countering attempts at corruption pressure;
- organize social actions and special events concerning anti-corruption efforts;
- ensure advanced training of employees of the Company and the Company's SAs whose job responsibilities include prevention of corruption offenses and counteraction to corruption, compliance control under the educational program of two levels (basic level for first-time students and advanced level for those who have been trained earlier);
- incentivize employees of the Company and the Company's SAs to provide confirmed information on corruption and other offenses in the Company and the

Company's SAs;

- guarantee that neither employee of the Company and the Company's SAs would suffer career or financial losses once he/she refuses to engage in corrupt practices, even if such refusal results in losses for the Company and the Company's SAs;

- oblige employees of the Company and the Company's SAs to sign an agreement on compliance with the principles and requirements of the Company's and SA's Anti-Corruption Policy as well as the norms of the anti-corruption legislation of the Russian Federation;

- declare the need to develop mechanisms of corporate sanctions for misconduct that may lead to corruption and other offenses.

6.5.2. Observe the principles and requirements of the Anti-Corruption Policy by employees of the Company and the Company's SAs when building a succession pipeline for promotion to higher positions in the Company and the Company's SAs.

6.6. Consulting and training of employees

6.6.1. The Company and the Company's SAs shall organize training of employees on prevention, repression and prophylaxis of corruption:

- carry out educational and awareness-raising activities (briefings, trainings, workshops, questionnaires and testing of employees of the Company and the Company's SAs) aimed at informing employees of the Company and the Company's SAs about the requirements of the legislation of the Russian Federation and applicable foreign anti-corruption legislation to form an anti-corruption consciousness of all employees of the Company and the Company's SAs, and to explain to them:

- the concept of corruption in the public and private sector;
- procedures of this Anti-Corruption Policy;
- circumstances, situations (factors, corruption risk scenarios) in which a bribe may be offered or received;
- key signs of corruption;
- which officials of the Company and the Company's SAs should be contacted and by what means to report any suspicions of corruption;
- measures of responsibility for committing corruption offenses;

- requirements of the legislation of the Russian Federation and local regulations of the Company and the Company's SAs in the area of prevention and combating corruption and the procedure for their application;
 - the procedure for identifying and resolving conflicts of interest;
 - acceptable behavior in situations of corruption risk, in particular in cases of bribe extortion by officials of state bodies, local government bodies, state and municipal institutions, state and municipal unitary enterprises, state corporations, public companies and other organizations;
 - the procedure for interaction with law enforcement agencies.
- provide individual counseling to employees of the Company and the Company's SAs on corruption prevention and counteraction issues in compliance with the principles of confidentiality;
 - in cooperation with educational and scientific organizations, ensure regular public lectures on anti-corruption topics in the Company's and SA's structural subdivisions;
 - with the involvement of scientific and educational organizations and PJSC Rosseti, improve the qualifications of employees of the Company's structural units and those of its SAs responsible for preventing corruption offenses and combating corruption, as well as compliance control, under additional professional education programs.

6.7. Review and Verification of Information about Possible Corruption

6.7.1. The Company and the Company's SAs shall accept applications from the Company's employees and those from its partners, counterparties and other (natural and legal) persons on risks and facts of corruption through the interactive channel of interaction with applicants, the Anti-Corruption Hotline telephone number, as well as by means of letters and e-mail messaging.

6.7.2. The Company and the Company's SAs shall take measures to protect employees of the Company and the Company's SAs who provided information through the channels of applications specified in clause 6.7.1 above from any forms of pressure (forced dismissal, demotion, discrimination and other violations of employees' rights).

6.7.3. The Company and the Company's SAs shall strive to create a set of effective measures to verify information on possible facts of corruption and, if confirmed, to eliminate (minimize) their consequences and the reasons contributing thereto.

6.8. Measures to prevent and protect against corruption when interacting with partners and counterparties of the Company and the Company's SAs

6.8.1. The Company and the Company's SAs are focused on establishing and maintaining business relationships with partners and counterparties which:

- support Anti-Corruption Policy;
- conduct business relations in a conscientious and honest manner;
- care about their own reputation;
- demonstrate high ethical standards of business conduct;
- implement their own anti-corruption measures;

- participate in collective anti-corruption initiatives.

6.8.2. The Company and the Company's SAs shall inform the Company's partners and counterparties about acceptable standards and rules of conduct through the anti-corruption clause and anti-corruption obligations.

6.8.3. The Company and the Company's SAs shall inform the partners and counterparties of the Company and the Company's SAs:

- to join the Anti-Corruption Charter of Russian Business;

- to comply, on a mandatory basis, with the requirements of the Anti-Corruption Procurement Standard of the Unified Procurement Standard of PJSC Rosseti (Procurement Regulations).

The anti-corruption procurement standard as part of the Unified Procurement Standard of PJSC Rosseti (Procurement Regulations) is posted on the Company's official corporate website.

6.8.4. The Anti-Corruption Procurement Standard establishes the procedure for reviewing procurement documents and procurement participants, counterparties in order to assess their reliability and integrity, exclude affiliation and risk of conflict of interest and other abuse of right or authority related to the positions held in the Company and the Company's SAs.

Within the framework of verification of procurement participants, winners, counterparties of the Company and the Company's SAs, as well as other third parties, co-executors/subcontractors engaged by the counterparties, the following activities shall be carried out: disclosure of the ownership structure of counterparties, beneficiaries, including ultimate beneficiaries (down to individuals), composition of their executive bodies; verification of their reputation and duration of their activity in the market of goods, works and services, participation in corruption scandals, fraud schemes, etc.; exclusion of affiliation, risk of conflicts of interest and other abuse of right or authority.

In the absence of anti-corruption measures in the organization of a procurement participant, winner, counterparty, the Company and the Company's SAs may recommend counterparties to implement such measures or take these circumstances into account when evaluating bids or subsequent interaction.

6.8.5. The Company and the Company's SAs shall establish rules for partners and counterparties that oblige them and their subcontractors/co-executors, in the course of fulfillment of their obligations, including when acting on behalf of or in the interests of the Company and the Company's SAs, not to commit actions qualified as giving a bribe (Article 291 of the CC of RF)/receiving a bribe (Article 290 of the CC of RF), mediation in bribery (Article 291.1 of the CC of RF), commercial bribery (Article 204 of the CC of RF), abuse of authority (Article 201 of the CC of RF), illegal remuneration on behalf of a legal entity (Article 19.28 of the CoAO), other unlawful acts (action or inaction) that have signs of corruption.

6.8.6. In the process of contract performance by a counterparty, the Company and the Company's SAs shall control the provision of information on the chain of ownership of the Company's or SA's counterparty down to an ultimate beneficiary (individual) in case of any changes in the structure of the counterparty's ownership, on third parties engaged by the counterparty to fulfill its obligations under the contract, as well as on the terms of fulfillment of contractual obligations and the financial condition of the counterparty, its compliance with the Anti-Corruption Clause.

In case the Company's or SA's counterparty fails to comply with the requirements specified in clause 6.8.6 of this Anti-Corruption Policy, the contractual relations shall be

terminated as provided for in the procedure established by the Company and the Company's SA.

6.8.7. The Company and the Company's SAs may train partners, counterparties on anti-corruption issues, especially those acting on behalf of or in the interests of the Company and the Company's SAs.

6.8.8. The counterparties and the Company and the Company's SAs refuse to stimulate each other's employees in any way, including by providing monetary sums, business gifts, gratuitous performance of work (services) and other methods not mentioned herein, which put an employee in a certain dependence and are aimed at ensuring that the employee performs any actions in favor of the party offering him/her an incentive (the counterparty or the Company or the Company's SAs).

The employee's actions performed in favor of the party offering incentives thereto (the counterparty or the Company or the Company's SAs) shall be understood as:

- providing unjustified advantages comparing to other contractors;
- provision of any guarantees, preferences;
- acceleration of existing procedures;
- other actions performed by the employee within the scope of his/her official duties, but contrary to the principles of transparency and openness of relations between the counterparty and the Company/Company's SAs.

6.9. Countering bribery of foreign public officials and officials of public international organizations

6.9.1. In order to minimize corruption, reputational risks and the risk of sanctions for bribery of foreign officials in international commercial transactions, bribery in the course of the core activities provided for by the Company's Articles of Association and Articles of Association of the Company's SAs, the Company and the Company's SAs shall take the following measures under the provisions of regulatory legal acts of the Russian Federation, Clause 9 of the Anti-Corruption Charter of Russian Business, international standards, and this Anti-Corruption Policy:

- analyze business processes of the Company and the Company's SAs in order to identify factors of such corruption risks, develop and implement control procedures to minimize them;
- inform employees of the Company and the Company's SAs about the measures of responsibility for bribery and/or receiving bribes from foreign officials or officials of public international organizations;
- keep records of foreign public officials and officials of public international organizations with whom the Company and the Company's SAs interact within the framework of contractual and pre-contractual relations, as well as records of employees of the Company and the Company's SAs who participate in such transactions;
- when revealing facts of bribery of foreign officials, inform the Investigative Committee of the Russian Federation;
- in international commercial transactions, if necessary, seek advice and support from diplomatic and trade missions of the Russian Federation abroad;
- inform interested parties, as part of anti-corruption monitoring, about measures taken in the Company and the Company's SAs to prevent bribery of foreign public officials and officials of public international organizations;
- interact with representatives of public authorities and law enforcement bodies, international and other organizations in order to develop and improve measures to counter

bribery of foreign public officials and officials of public international organizations;
 - monitor the effectiveness of control procedures and measures taken thereby.

6.10. Procedure for interaction with regulatory and supervisory authorities

6.10.1. When interacting with the executive authorities of the Russian Federation that perform regulatory and supervisory functions, employees of the Company and the Company's SAs are prohibited from giving, offering or promising business gifts, including those with a value of less than three thousand rubles, money, securities, other property, providing services of a proprietary nature, or granting proprietary rights on behalf of and in the interests of the Company and the Company's SAs.

6.10.2. The Company and the Company's SAs shall establish the procedure for reporting to law enforcement authorities on the facts of violation of requirements to official behavior of public and civil servants in the course of control and supervisory activities in the Company and the Company's SAs, including the pre-trial procedure for appealing against their actions.

6.10.3. The Company and the Company's SAs shall cooperate with law enforcement authorities in the course of their inspections of the Company and the Company's SAs on issues related to prevention and combating corruption.

6.10.4. Ensure fulfillment of the requirements of the legislation of the Russian Federation, instructions of the Chairman of the Government of the Russian Federation¹ and decisions of the Commission under the President of the Russian Federation on the fuel and energy complex development strategy² within the framework of ensuring transparency of financial and economic activities of the Company and SAs.

6.11. Cooperation with law enforcement agencies in combating corruption

6.11.1. In accordance with paragraph 2 of Article 13.3 of the Anti-Corruption Law, the Company and the Company's SAs shall take the following actions for the purpose of cooperation with law enforcement agencies:

- report to the relevant law enforcement authorities on identified facts of corruption and other offenses;
- provide support in the detection and investigation of corruption, suppression or investigation of corruption offenses, including operational-search activities, take necessary measures to preserve and transfer documents and information containing data on corruption offenses;
- exclude unlawful interference of employees of the Company and the Company's SAs in the activities of law enforcement agencies;
- refrain from any sanctions against employees of the Company and the Company's SAs who have reported to the law enforcement authorities about preparation or commission

¹ Instructions of the Government of the Russian Federation No. VP-P13-9308 of December 28, 2011 and No. VP-P24-1269 of March 5, 2012 on disclosure of information regarding the structure of counterparty owners, submission of data on income, property and property obligations of management personnel, prevention and detection of conflicts of interest and other abuses related to positions held in the Company.

² Protocol of the Commission under the President of the Russian Federation on the development strategy of the fuel and energy complex and environmental safety No. A-60-26-8 of 10.07.2013.

of corruption and other offenses that became known to them in the course of their labor (job) duties.

6.12. Participation in collective initiatives to prevent and combat corruption

6.12.1. The Company and the Company's SAs shall participate in collective anti-corruption initiatives in order to implement measures to prevent and combat corruption in their activities, create conditions for public condemnation and rejection of corrupt practices in interaction with public authorities and in corporate relations, and exchange experience:

- when holding events to implement the provisions of the Anti-Corruption Charter of Russian Business in accordance with the Regulations on the conditions and procedure for implementing the provisions of the Anti-Corruption Charter of Russian Business;
- when using standard anti-corruption clauses in joint agreements;
- when publicly refusing to engage with organizations involved in corruption offences;
- in organizing and conducting joint training on prevention and combating corruption;
- when employees of the Company and the Company's SAs participate in international and other anti-corruption activities.

6.12.2. A consolidated list of anti-corruption measures implemented in the Company and the Company's SAs is presented in Annex 3 hereof, which is an integral part of this Anti-Corruption Policy.

7. Subsidiaries and Affiliates (SA)

The Company and the Company's SAs, in accordance with the corporate governance system applied in the Company and the Company's SAs, shall initiate in the SAs the implementation of their own anti-corruption policies similar to this Anti-Corruption Policy and shall make reasonable efforts to ensure that the fundamental principles and requirements of the Anti-Corruption Policy are complied with and

observed in joint ventures, companies and associations, the shares and interests, wherein the Company and the Company's SAs own stocks and shares.

8. Responsibility

8.1. Employees of the Company and the Company's SAs, regardless of their position, shall be personally responsible for compliance with the provisions of this Anti-Corruption Policy.

8.2. The Company and the Company's SAs shall take measures to ensure that persons guilty of corruption offenses are brought to responsibility established by the anti-corruption legislation of the Russian Federation.

8.3. Persons guilty of violating the provisions of the Anti-Corruption Policy shall be subject to corporate action.

8.4. Measures of responsibility for corruption and other offenses in the Company and the Company's SAs include disciplinary, administrative and criminal liability measures in accordance with the legislation of the Russian Federation, as well as corporate action measures in accordance with the Company's local regulations and local regulations of the Company's SAs.

9. Adoption, review and revision of the Anti-Corruption Policy

9.1. The Company and the Company's SAs shall regularly monitor the effectiveness of the measures of this Anti-Corruption Policy through internal and/or external audits.

9.2. The Company and the Company's SAs shall provide conditions under which employees of the Company and the Company's SAs, as well as any other stakeholders may freely point out the shortcomings of this Anti-Corruption Policy and make proposals for its improvement.

9.3. The results of the anti-corruption plan implementation are presented in the annual social reports on sustainable development of the Company and the Company's SAs.

9.4. This Anti-Corruption Policy shall be updated in the following cases:

- the need to bring the provisions of this Anti-Corruption Policy into compliance with Russian and applicable foreign anti-corruption legislation;
- changes in the organizational, staffing or functional structure of the Company that have a direct impact on the implementation of this Anti-Corruption Policy;
- the need to improve the implementation of this Anti-Corruption Policy.

List of underlying regulatory legal acts of the Russian Federation used for the development of this Anti-Corruption Policy

- Civil Code of the Russian Federation;
- Labor Code of the Russian Federation;
- Code of the Russian Federation on Administrative Offenses;
- Criminal Code of the Russian Federation;
- Federal Law No. 208-FZ of 26.12.1995 ‘On Joint Stock Companies’;
- Federal Law No. 115-FZ of 07.08.2001 ‘On Combating Legalization (Laundering) of Proceeds of Crime and Financing of Terrorism’;
- Federal Law No. 273-FZ of 25.12.2008 ‘On Combating Corruption’;
- Federal Law No. 224-FZ of 27.07.2010 ‘On Counteracting the Illegitimate Use of Insider Information and Manipulation of the Market, and on Making Amendments to Separate Legislative Acts of the Russian Federation’;
- Federal Law No. 230-FZ of 03.12.2012 ‘On Monitoring Consistency of Expenses of Public Officials and other Persons with their Income’;
- Federal Law No. 79-FZ of 07.05.2013 ‘On Prohibition of Particular Categories of Citizens to Open and Hold Accounts (Deposits), Keep Cash Funds and other Valuables in Foreign Banks Located outside the Russian Federation, to Own and/or Use Foreign Financial Instruments’;
- Decree of the President of the Russian Federation No. 309 of 02.04.2013 ‘On Measures for Implementing the Federal Law on Combating Corruption’;
- Decree of the President of the Russian Federation No. 613 of 08.07.2013 ‘On Anti-Corruption Issues’;
- Decrees of the President of the Russian Federation with National Anti-Corruption Plans;
- Resolution of the Government of the Russian Federation No. 568 of 05.07.2013 ‘On the Extension of the Restrictions, Prohibitions and Obligations Established by the Federal Law ‘On Combating Corruption’ and Other Federal Laws in Order to Combat Corruption to Certain Categories of Citizens’;
- Resolution of the Government of the Russian Federation No. 613 of 22.07.2013 ‘On Provision by Citizens, Seeking Positions in Organizations Established to Address the Tasks Assigned to the Russian Federation Government, and Employees Occupying Positions in these Organizations, of Information about Income, Expenses, Property and Property-Related Obligations; Validation and Completeness Check of Information and of Employees’ Compliance with Official Conduct Requirements’;
- Resolution of the Government of the Russian Federation No. 10 of 09.01.2014 ‘On the Procedure for Reporting by Certain Categories of Persons on Receipt of a Gift in Connection with their Official Position or Performance of their Official (Job) Duties, Surrender and Evaluation of the Gift, Realization (Redemption) and Crediting the Proceeds from its Sale’;
- Resolution of the Government of the Russian Federation No. 29 of 21.01.2015 ‘On Approval of the Rules for the Employer’s Reporting of the Conclusion of an Employment or Civil-Legal Contract for the Performance of Work (Provision of Services) with a Citizen who has Positions in the State or Municipal Service, the list of which is established by

regulatory legal acts of the Russian Federation’;

- The development strategy of the power grid complex of the Russian Federation approved by Order of the Government of the Russian Federation No. 511-r of 03.04.2013;

- Methodological Recommendations on the development and adoption by organizations of measures to prevent and combat corruption developed by the Ministry of Labor and Social Protection of Russia approved on 28.03.2014;

- Methodological Recommendations on the organization of corruption risk management and internal control processes in the field of corruption prevention and counteraction approved by Rosimushchestvo Order No. 80 dated 02.03.2016;

- Corporate Governance Code reviewed on 13.02.2014 at the meeting of the Government of the Russian Federation, approved on 21.03.2014 by the Board of Directors of the Bank of Russia and recommended for application by joint stock companies (hereinafter, Corporate Governance Code);

- Anti-Corruption Charter of Russian Business signed by the Chamber of Commerce and Industry of the Russian Federation, the Russian Union of Industrialists and Entrepreneurs, the All-Russian Public Organization ‘Business Russia’ and the All-Russian Public Organization ‘OPORA Russia’;

- other Russian regulatory legal acts in the field of preventing and combating corruption;

- Minutes and instructions of the public authorities of the Russian Federation:

- Protocol of the Commission under the President of the Russian Federation on the development strategy of the fuel and energy complex and environmental safety No. A-60-26-8 of 10.07.2013;

- Instructions of the Government of the Russian Federation No. VP-P13-9308 of 28.12.2011 and No. VP-P24-1269 of 05.03.2012 on disclosure of information on the ownership structure of counterparties, on submission of data on income, property and property obligations of the management personnel, on prevention and detection of conflicts of interest and other abuses related to the positions held in the Company;

- GOST R ISO 26000-2012 Guidelines for Social Responsibility;

- Articles of the Company;

- Code of Corporate Ethics and Official Conduct of the Company’s employees.

Terms and definitions used in this Anti-Corruption Policy

Anti-Corruption Clause	Contracts, agreements, and arrangements of the Company and the Company's SAs declaring the position of the Company and the Company's SAs in the field of combating and preventing corruption and other offenses.
Anti-Corruption Policy	An organizational and administrative document of the Company, which consists of a set of interrelated principles, procedures and specific measures aimed at preventing and combating corruption. The concept applies to the Company and the Company's SAs, depending on the context
Anti-Corruption Liabilities	Consent of the participant in the procurement procedures of the Company and the Company's SAs to comply with and follow the principles and requirements of the Anti-Corruption Policy, including the obligation not to commit corruption and other offenses, to provide complete and reliable information on the chain of ownership down to individuals, as well as on the composition of executive bodies with the attachment of supporting documents
Anti-Corruption Monitoring	Collection, review and generalization of measures implemented in the Company and the Company's SAs in order to assess their effectiveness, analyze corruption factors and risks of their implementation; review and evaluate data obtained as a result of control procedures; forecast corruption offenses and develop ways to combat corruption
Giving Bribe	Giving a bribe to an official, a foreign official or an official of a public international organization in person or through an intermediary (including when the bribe is transferred to another individual or legal entity on the instructions of the official). Foreign official means any appointed or elected person holding any office in the legislative, executive, administrative or judicial authority of a foreign state and any person performing a public function for a foreign state, including a public agency or public enterprise. Officials of a public international organization include, inter alia, employees of the organization who are international civil servants, persons authorized to act on behalf of a public international organization, members of parliamentary assemblies of international organizations to which the Russian Federation is a party, persons holding judicial office in any international court whose jurisdiction is recognized by the Russian Federation (Article 291 of the Criminal Code of the Russian Federation).
Business Gift (for the purposes of the Anti-Corruption Policy)	A gift that may be received by an employee of the Company or the Company's SAs in connection with protocol events, business trips, other official events within

	the limits and norms defined by the legislation of the Russian Federation, as well as by local regulatory acts of the Company or the Company's SAs.
Abuse of Authority	The use by a person performing managerial functions in a commercial organization its powers contrary to legitimate interests of this organization and in order to obtain benefits for themselves or others or harming other persons, provided that such an offense entailed causing significant harm to the rights and legitimate interests of citizens or organizations or legally protected interests of society or the state. A person who performs managerial functions in a commercial or other organization, as well as in a non-profit organization that is not a state body, local government body, state or municipal institution, is a person who performs the functions of a Sole Executive body, a member of the Board of Directors or other Collegial Executive Body, as well as a person who permanently, temporarily or by special authority performs organizational and administrative or economic functions in these organizations (Article 201 of the Criminal Code of the Russian Federation)
Foreign Public Officials and Officials of Public International Organizations	In accordance with the UN Convention against Corruption of October 31, 2003, 'foreign public official' is defined as any appointed or elected person holding any position in the legislative, executive, administrative or judicial body of a foreign state, and any person performing any public function for a foreign state, including for a public office or state enterprise.
Commercial Bribery	Illegal transfer of money, securities, or other property to a person performing managerial functions in a commercial or other organization, as well as illegal provision of property-related services, provision of other property rights (including when property is transferred, or property-related services are provided, or property rights are granted to another individual or legal entity) for performing actions (inaction) in the interests of the giver or other persons, provided that these actions (inaction) are within the official powers of such a person or if, by virtue of their official position, they can contribute to these actions (inaction) (Article 204 of the Criminal Code of the Russian Federation)
Compliance	Compliance of the organization's activities with the requirements imposed thereon by Russian and foreign legislation, local regulations, and other mandatory regulatory documents
Counterparty	Any Russian or foreign legal entity or individual with whom the Company or a SA enters into contractual relations with the establishment of various rights and obligations (except for labor relations) and who are not united by a common goal
Conflict of Interest	Personal interest (direct or indirect) of a person holding a

	position, which provides for the obligation to take measures to prevent and resolve conflicts of interest, affects or may affect the proper, objective and impartial performance of his/her official (service) duties (exercise of powers)
Corruption Offence	A wrongful guilty act (action or inaction) possessing the features of corruption, for which criminal, administrative, civil and disciplinary liability is envisaged in accordance with the legislation of the Russian Federation
Corruption Risk	Possibility of committing a corruption offense by an employee of the Company or the Company's SAs
Corruption	a) Abuse of official position, bribe giving, bribe taking, abuse of authority, commercial bribery or other illegal use by an individual of his/her official position contrary to the legitimate interests of society and the state in order to obtain a benefit in the form of money, valuables, other property or services of a property nature, other property rights for himself/herself or for third parties or illegal provision of such benefit to the said person by other natural persons; b) Commission of the acts specified in subparagraph 'a' hereof
Personal Interest	The possibility of receiving income in the form of money, other property, including property rights, property services, the results of work performed or any benefits (advantages) by an employee of the Company and/or the Company's SA and/or persons who are closely related or next of kin (parents, spouses, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and spouses of children), citizens or organizations with whom employees of the Company and/or the Company's SAs and/or persons who are closely related or next of kin to him/her and connected by property, corporate or other close relationships
Persons who are Manager's/Employee's Next of Kin or Nearly Related	Parents, spouses, children, siblings, also siblings, parents, children of a spouse and spouse's children
Material Benefit	Profit in cash or in kind that can be estimated and defined as income under the tax legislation of the Russian Federation
Methodological Recommendations of the Ministry of Labor	Methodological Recommendations on the development and adoption by organizations of measures to prevent and combat corruption developed by the Ministry of Labor and Social Protection of the Russian Federation (approved on 28.03.2014)
Illegal Remuneration on Behalf of a Legal Entity	Illegal transfer, offer or promise on behalf of or in the interests of a legal entity or in the interests of a related legal entity to an official, a person performing managerial functions in a commercial or other organization, a foreign official or an official of a public international organization of money, securities or other property, providing him with

	<p>property services or granting him property rights (including if, on behalf of an official, a person performing managerial functions in a commercial or other organization, a foreign official or an official of a public international organization, money, securities or other property is transferred, offered or promised, property-related services are provided or property rights are granted to another individual or legal entity) for the commission in the interests of this legal entity or in the interests of a related legal entity by an official, a person performing managerial functions in a commercial or other organization, a foreign official or an official of a public international organization of an action (inaction) related to his/her official position (Article 19.28 of the CoAO). Officials are persons who permanently, temporarily or by special authority carry out the functions of a government representative or perform organizational, administrative, economic functions in state bodies, local governments, state and municipal institutions, state non-budgetary funds, state corporations, state companies, publicly -legal companies, at state and municipal unitary enterprises, in business companies, in the supreme governing body of which the Russian Federation, a constituent entity of the Russian Federation or a municipal entity has the right to directly or indirectly (through persons controlled by them) dispose of more than fifty percent of the votes, or in which the Russian Federation, a constituent entity of the Russian Federation or a municipal entity, has the right to appoint (elect) a sole executive body and/or more than fifty percent of the composition of the collegial management body, in joint stock companies in respect of which a special right to participation of the Russian Federation, constituent entities of the Russian Federation or municipalities in the management of such joint stock companies ('golden share') is used, as well as in the Armed Forces of the Russian Federation, other troops and military formations of the Russian Federation (Note 1 to Article 285 of the Criminal Code of the Russian Federation)</p>
<p>Illegal Employment or Recruitment of a State or Municipal Employee or a Former State or Municipal Employee to Perform Work or Provide Services</p>	<p>Engagement by the employer or the owner of works (services) under the terms of an employment contract or to perform works or provide services under the terms of a civil law contract of a state or municipal employee who holds a public office included in the list established by regulatory legal acts, or a former state or municipal employee who filled such a post, in violation of the requirements provided for by the Anti-Corruption Law (Article 19.29 of the CoAO)</p>

Partner	Any Russian or foreign legal entity or individual with whom the Company or the Company's SAs enters into contractual relations aimed at achieving a joint goal
Bribe-Taking	Receipt by an official, a foreign official, or an official of a public international organization, personally or through an intermediary, of a bribe in the form of money, securities, or other property, or in the form of illegal services of a property nature, or the granting of other property rights (including when the bribe is transferred to another individual or legal entity on the instructions of the official) for committing actions (inaction) in favor of the bribe-giver or persons represented thereby, provided that the specified actions (inaction) are within the official powers of the official or if, by virtue of his official position, he/she can contribute to the specified actions (inaction), as well as for the general patronage or connivance in the service (Article 290 of the Criminal Code of the Russian Federation)
Mediation in Bribery	The transfer of a bribe on the instructions of the bribe-giver or the bribe-taker or other promotion of the giver and/or taker in achieving or implementing of an agreement therebetween about receiving and giving a bribe in a considerable size, and promise or offer of mediation in bribery (Article 291.1 of the Criminal Code of the Russian Federation)
Pre-Conflict Situation	A situation when an employee of the Company and/or the Company's SAs, as well as the Customer/Procurement Organizer or their representatives, in the course of their official or professional activities, have a personal interest that would lead to a conflict of interest
Provocation of Bribery, Commercial Bribes or Bribery in the Procurement of Goods, Construction and Services for the Provision of Public or Municipal Needs	Attempt to transfer to an official, foreign official, official of a public international organization, a person performing managerial functions in commercial or other organizations, or a person specified in part one of Article 200.5 of the Criminal Code of the Russian Federation (a contract service employee, a contract manager, a member of the procurement commission, a person accepting goods supplied, work performed or services rendered, or another authorized person representing the interests of the customer in the field of procurement of goods, works, services to meet state or municipal needs) without his/her consent, money, securities, other property or provision of property services thereto, provision of other property rights for the purpose of artificially creating evidence of a crime or blackmail (Article 304 of the Criminal Code of the Russian Federation)
Prevention of Corruption	The organization's activities aimed at introducing elements of corporate culture, organizational structure, rules and procedures regulated by internal local laws ensuring the prevention of corruption offenses
Prevention of Corruption Practices	Activities of the organization with an aim to identify and

	eliminate the causes of corruption
Combating Corruption	Activities of the Company and the Company's SAs, as well as employees of the Company and the Company's SAs within the limits of their authority to prevent corruption, identify, prevent, suppress, disclose and internally investigate corruption offenses (fight against corruption), minimize and/or eliminate the consequences of corruption offenses
Employee of the Company and the Company's SAs	A person with whom the Company or the Company's SAs have entered into an employment or civil law contract
Structural Unit Responsible for Prevention of Corruption Offenses, Anti-Corruption, Compliance Control	Corporate Protection Department of the Company, Internal Control and Risk Management Department of the Company within their competence, structural subdivisions of the Company's SAs, which, according to the organizational structure of the Company's SAs, perform functions for the prevention of corruption offenses, anti-corruption, and compliance control
Labor Dynasty	A group of employees of the Company's production personnel who are closely related or next of kin (parents, spouses, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and spouses of children), consisting of at least three people representing at least two generations characterized by the transfer of professional skills from the older generation to the younger
Procurement Participant	The procurement participant is any legal entity or several legal entities acting on the side of one procurement participant, regardless of the organizational and legal form, form of ownership, location and place of origin of capital, except for a legal entity that is a foreign agent in accordance with the Federal Law 255-FZ of July 14, 2022 'On Control over the Activities of Persons under Foreign Influence', or any individual or several individuals acting on the side of one procurement participant, including, but not limited to, an individual entrepreneur or several individual entrepreneurs acting on the side of one procurement participant, with the exception of an individual who is a foreign agent in accordance with the Federal Law No. 255-FZ of July 14, 2022 'On Control over the Activities of Persons under Foreign Influence'

<p>Consolidated list of anti-corruption measures implemented in the Company and the Company's SAs</p> <p>Mechanism of Implementation of the Company's and SA's Anti-Corruption Policy/Anti-Corruption Measures</p>
<p>1. Defining the functions and tasks of subdivisions and officials responsible for prevention of corruption offenses and prevention of corruption</p>
<p>1.1. Updating the Anti-Corruption Policy (tasks, functions, duties and powers of structural units or officials responsible for prevention of corruption offenses, anti-corruption, and compliance control).</p>
<p>1.2. Defining the functions of structural units responsible for prevention of corruption offenses, anti-corruption, and compliance control.</p>
<p>2. Organization of the corruption risk management and internal control process in the Company and the Company's SAs</p>
<p>2.1. Analysis of business processes, definition of control environment, identification, description, assessment of corruption risks (keeping a register (list), passports, changing the map of corruption risks, identification of owners of corruption risks, list of positions with high corruption risk).</p>
<p>2.2. Description of corruption risk factors and determination of the consequences of their realization.</p>
<p>2.3. Development of a set of measures to eliminate and minimize corruption risks;</p>
<p>2.4. Establishment of special anti-corruption procedures and requirements, including regular completion of the Declaration of a conflict of interest.</p>
<p>2.5. Evaluation of efficiency and control of existing measures to minimize corruption risks of the Company and the Company's SAs. Monitoring of risk factors.</p>
<p>2.6. Development of new measures and improvement of those already existing to minimize corruption risks.</p>
<p>2.7. Annual updating of corruption risk passports.</p>
<p>2.8. Verification of compliance with the requirements of the Anti-Corruption Policy in the Company and the Company's subsidiaries and affiliates.</p>
<p>2.9. Monitoring and control of economic feasibility of the Company's and SA's expenditures in areas with high corruption risk (exchange of business gifts, hospitality expenses, charitable donations, remuneration to external consultants, etc.), including through the mechanism for checking the reasonableness of the calculation of the initial (maximum) purchase price.</p>
<p>3. Monitoring the risk management system and internal control system in the sphere of preventing and countering corruption and evaluating their effectiveness</p>
<p>3.1. Conducting a self-assessment of the effectiveness of corporate and process controls in the area of combating and preventing corruption.</p>
<p>3.2. Internal independent assessment of the internal control and risk management system by the internal audit unit (verification of the reliability of procedures for countering illegal actions, abuse and corruption).</p>
<p>3.3. Conducting an external independent assessment of the effectiveness of the risk management and internal control system (hereinafter, RMICS) in the field of combating and preventing corruption, with submission of the results of the audit to the Company's Board of Directors and the Boards of Directors of the Company's SAs.</p>

3.4. Submission of reports on the results of anti-corruption monitoring to the Company's Board of Directors (with preliminary review by the Audit Committee under the Board of Directors) and Boards of Directors of the Company's SAs.
4. Prevention and resolution of conflicts of interest
4.1. Development and implementation of provisions on conflict of interest (procedure for informing employees of the Company and the Company's SAs of the occurrence of a conflict of interest and settlement of the revealed conflict of interest, fixing the duties and responsibilities of employees, typical situations of pre/conflict of interest, etc.), forms of declarations on conflicts of interest.
4.2. Updating the procedure for working collegial bodies (commissions) to consider issues related to the settlement of conflicts of interest (the Company's Commissions for Compliance with Corporate Ethics and Settlement of Conflicts of interest and those of the Company's SAs).
4.3. Auditing the fact of a conflict of interests of employees with the participation of structural subdivisions of the Company and SAs responsible for the prevention of corruption offenses, anti-corruption, and compliance control.
4.4. Informing employees about the adopted local regulatory acts (hereinafter, LRA) on conflict of interest management and the obligation to comply with the requirements contained therein.
4.5. Organization and provision of activities to resolve conflicts of interest.
4.6. Organizing declaration of conflicts of interest by candidates when they are employed by the Company or the Company's SAs, or when they are transferred to managerial positions.
4.7. Organizing annual declaration of conflicts of interest by employees of the Company and the Company's SAs.
4.8. Analysis of information received in the course of declaring conflicts of interest by employees of the Company and the Company's SAs.
4.9. Submission of a report on declaration of conflicts of interest by the Company's and SA's employees to the Central Commission for Compliance with Corporate Ethics and Settlement of Conflicts of Interest in PJSC Rosseti.
4.10. Organizing annual declaration of information on income, property and property-related obligations of persons defined by the LRA of the Company and the Company's SAs in accordance with the regulatory legal acts of the Russian Federation.
4.11. Development of measures to resolve a pre-conflict situation, resolve a conflict of interests of a manager or employee (including review or change of job responsibilities and labor functions, removal from decision-making that is the subject of a conflict of interests, transfer to another position, termination of an employment contract, etc.).
4.12. Control over the application of liability measures stipulated by the legislation for each case of non-compliance with prohibitions, restrictions and requirements established for the purpose of combating corruption, including measures to prevent and/or resolve conflicts of interest.
5. Development and implementation of standards and procedures aimed at ensuring fair work in the activities of the Company and the Company's SAs
5.1. Development (jointly with participation of public associations) and implementation of a set of organizational, explanatory and other measures to ensure compliance by employees of the Company and the Company's SAs with prohibitions, restrictions and requirements of the Law on Combating Corruption.
5.2. Updating the Code of Corporate Ethics and Official Conduct of the Company's employees.
5.3. Establishing a prohibition on hiring persons who are in close kinship or relationship if it is connected with the subordination or control of one of them to the other.
5.4. Development and updating of rules governing the exchange of business gifts and tokens of business hospitality, charity and sponsorship.

5.5. Conclusion of agreements with employees of the Company and the Company's SAs on compliance with the requirements of the Anti-Corruption Policy.
5.6. Participation in the verification of candidates for positions in the Company and the Company's SAs in order to prevent corruption and eliminate conflicts of interest.
5.7. Taking measures to prevent misuse of insider information and market manipulation.
5.8. Development and implementation of anti-corruption provisions in labor, civil law contracts with employees of the Company and the Company's SAs, contracts/ agreements with counterparties and partners.
6. Review and verification of allegations of corruption and other abuses
6.1. Control over fulfillment of the LRA on the procedure for consideration of reports on possible facts of corruption in the Company and the Company's SAs (procedure for receipt, consideration and resolution of complaints, terms of consideration, procedure for interaction with structural subdivisions, introduction of a procedure for employees to inform the employer of cases of inducing them to commit corruption violations, etc.).
6.2. Control over the continuous functioning of available channels of information transmission, feedback mechanisms, helpline, hotline, etc. Control over placement and updating of information on channels of employee appeals in production departments (PD), power grid districts (PGD) of the Company's SAs.
6.3. Control over organizing and ensuring work related to consideration of appeals. Participation of responsible employees of the Company's SAs in consideration of appeals received by the Company.
6.4. Analysis and monitoring of compliance with prohibitions, restrictions and requirements established for the purpose of combating corruption, including those related to receiving gifts by certain categories of persons, performing other paid work, and the obligation to notify of requests for inducement to commit corruption offenses.
6.5. Introduction of procedures to protect employees who have reported corruption offenses.
7. Legal education and formation of the fundamentals of law-abiding behavior of employees, consulting and training of employees
7.1. Development and publication of methodological and informational materials on anti-corruption standards of conduct.
7.2. Placement of information about measures to implement the Anti-Corruption Policy of the Company and the Company's SAs on the official corporate websites of the Company and the Company's SAs, in the corporate newspaper, mass media and other sources of information.
7.3. Ensuring the dissemination of positive experience in countering attempts of corruption pressure by employees and the Company in interaction with the mass media.
7.4. Ensuring annual professional development for employees whose job responsibilities include participation in anti-corruption, according to the educational program of two levels (basic level for first-time students and advanced level for those who have previously completed training).
7.5. Holding training and awareness-raising events on corruption prevention and counteraction (trainings, workshops, conferences, forums, round tables, etc.) aimed at informing employees of the Company and the Company's SAs about the requirements of the legislation of the Russian Federation and applicable international anti-corruption legislation, and at forming anti-corruption consciousness among employees.
7.6. Developing a negative attitude towards corruption among employees of the Company and its SAs.
7.7. Organizing individual consulting of employees of the Company and the Company's SAs on the application (compliance) with anti-corruption standards and procedures.
7.8. Ensuring regular public lectures on anti-corruption topics in the Company and its SAs in

cooperation with educational and scientific organizations.
7.9. Organizing annual workshops (meetings) of the Company's subdivision responsible for the prevention of corruption offenses and combating corruption on issues related to the application of laws of the Russian Federation on anti-corruption with the heads of divisions of the Company's SAs responsible for the prevention of corruption offenses, anti-corruption, and compliance control.
8. Taking measures to prevent corruption in collaboration with partners and counterparts
8.1. Control of special procedures for checking counterparties in order to reduce the risk of involvement of employees of the Company and the Company's SAs in corrupt activities and other unfair practices (improvement of the unified automated system for analyzing and collecting information on the beneficiaries of counterparties (AS 'ACIB'), which provides for verification of the level of reliability and financial stability of counterparties (absence of unscrupulous suppliers in the register, presence of negative information background, etc.)).
8.2. Control over the implementation of a unified mechanism of anti-corruption control of procurement (including the Anti-Corruption Procurement Standard) in the Company and the Company's SAs.
8.3. Updating the LRA on organization of work to disclose information on the chain of ownership of procurement participants and counterparties of the Company and the Company's SAs.
8.4. Dissemination among counterparties and partners of programs, policies, standards of conduct, procedures and rules aimed at preventing and combating corruption, which are applied in the Company and the Company's SAs (anti-corruption commitments, anti-corruption standard, anti-corruption clause, etc.).
8.5. Informing the public about the degree of implementation and successes in implementing anti-corruption measures (placing relevant information on the official websites of the Company and the Company's SAS, in mass media and other sources).
9. Interaction with state bodies exercising control and oversight functions, cooperation with law enforcement agencies in the field of combating corruption
9.1. Development and approval of LRA on the procedure of interaction of the Company with regulatory and law enforcement bodies.
9.2. Interaction with federal government agencies on issues of practical application of legislative provisions in the field of corruption prevention and counteraction, improvement of the regulatory legal framework, including development of proposals for amendments to existing regulatory legal acts of the Russian Federation in the field of corruption prevention and counteraction, participation in working (expert) groups under the General Prosecutor's Office of the Russian Federation, Rosfinmonitoring, Chamber of Commerce and Industry of the Russian Federation, etc.
9.3. Assisting in the detection and investigation of corruption offenses by law enforcement agencies.
9.4. Assistance in conducting inspections and non-interference with the legitimate activities of inspectors, reporting to them about cases of corruption.
10. Participation in collective initiatives to prevent and combat corruption
10.1. Implementation of provisions of the Anti-Corruption Charter of Russian Business:
10.1.1. Organizing and ensuring interaction with representatives of the Russian business community: Chamber of Commerce and Industry of the Russian Federation, Russian public organizations 'Russian Union of Industrialists and Entrepreneurs', 'Delovaya Rossiya', 'OPORA Rossii' and other Charter participants (participation in working groups, joint training,

etc.).
10.1.2. Carrying out activities aimed at preventing and combating corruption: - ensuring compliance with the requirements imposed on the Company as a participant of the Anti-Corruption Charter of Russian Business; - participation in the work of the interdepartmental working group of the Ministry of Labor and Social Protection of the Russian Federation on the implementation of the legal requirements of the Russian Federation on combating corruption in state bodies and organizations.
10.2. Participation in other collective initiatives:
10.2.1. Use of standard anti-corruption clauses in joint agreements.
10.2.2. Placement on corporate websites of a public address by the head of the Company to employees, counterparties, partners of organizations on rejection of corruption and bribery.
10.2.3. Public refusal to engage in joint activities with organizations (persons) involved in corruption offences.
10.2.4. Participation of the Company's and SA's specialists in international and other anti-corruption arrangements.
11. Countering bribery of foreign public officials and officials of public international organizations
11.1. Development and approval of LRA on measures to counteract bribery of public foreign officials (procedure for employees to report facts of bribery of public foreign officials that have come to their knowledge, forwarding information to the Investigative Committee of the Russian Federation, measures to counteract bribery).
11.2. Interaction with representatives of government authorities and law enforcement agencies of the Russian Federation, diplomatic and trade missions of the Russian Federation abroad, international and other organizations in order to develop and improve measures to counter bribery of foreign public officials and officials of public international organizations in international commercial transactions when implementing activities of the Company and the Company's SAs.
11.3. Monitor the effectiveness of measures taken to counteract bribery of foreign public officials and officials of public international organizations.
12. Adoption, review and revision of the Anti-Corruption Policy
12.1. Monitoring of international standards, anti-corruption legislation of the Russian Federation, the Company's and SA's LRA in the field of prevention and combating corruption.
12.2. Evaluation of the effectiveness of the Anti-Corruption Policy.
12.3. Reviewing and amending the Anti-Corruption Policy.