APPROVED by the decision of the Board of Directors Rosseti Moscow Region PJSC 15.06.2023 (Minutes No. 580 dated 16.06.2023)

Risk Management and Internal Control Policy Rosseti Moscow Region PJSC

Moscow, 2023

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1. General Regulations

1.1. The Risk Management and Internal Control Policy of Rosseti Moscow Region PJSC (hereinafter referred to as the Policy) was developed in order to determine the basic principles of organizing and functioning of the Risk Management and Internal Control System (hereinafter referred to as "RMICS") and to form common approaches to building a RMICS in Rosseti Moscow Region PJSC (hereinafter referred to as the Company).

1.2. The Policy defines:

- goals and objectives of RMICS;

- principles of RMICS functioning;

- RMICS participants, distribution of duties and powers between RMICS participants and nature of their interaction;

- forms of evaluating the RMICS efficiency;

- other approaches used in RMICS organization and functioning.

1.3. The purpose of the Policy is to ensure the implementation and maintenance of an effective RMICS that meets generally recognized practices and standards in the field of risk management and internal control, as well as the requirements of regulatory and supervisory authorities, and contributes to the achievement of the Company's business goals.

1.4. The Policy has been developed in accordance with the requirements of the current legislation of the Russian Federation, the recommendations of international and national standards in the field of risk management and internal control, the Company's local regulations, as well as best practices in the field of risk management and internal control.

1.5. Risk management and internal control are considered in the context of a single system integrated into the Company's business processes; they are not separate processes and/or activities separate from the Company's core activities and business processes. Integrating risk management and internal control into the Company's activities is aimed at improving the efficiency of the implementation of the Rosseti Group's strategy and achieving the Company's goals.

1.6. The Policy applies to all participants of the Company's risk management and internal control process specified in Section 5 of the Policy.

1.7. The Policy is the basis for the development of separate methodological, organizational and regulatory documents

governing the applied aspects of the organization and operation of the RMICS at all management levels of the Company and describing the methods and tools in the field of risk management and internal control.

1.8. The Policy, as well as all amendments and additions hereto, are approved by the Company's Board of Directors.

Proposals for updating the Policy are prepared by the Risk Management and Internal Control Department.

The initiators of amendments to the Policy may be: the Company's Board of Directors, the authorized Committee of the Board of Directors or other committees of the Company's Board of Directors within their competence, the Company's Audit Commission, and the Company's executive bodies. Amendments and additions to

the Policy are introduced as necessary: in case of changes in Russian legislation, changes in international or national risk management and internal control standards, further development and improvement of the RMICS, changes in the organizational and functional structure, external evaluation of the RMICS efficiency, and changes in other material conditions of the Company and the Rosseti Group of Companies.

2. Terms, Definitions and Abbreviations

2.1. The Policy uses the following basic terms and definitions:

Internal Control is a process carried out by the Company's Board of Directors, the

Company's Audit Commission, executive bodies and employees of the Company at all levels of management and aimed at obtaining reasonable confidence that the Company provides:

- the efficiency and effectiveness of its activities, including the achievement of financial and operational indicators, the safety of assets;

- the reliability, completeness and timeliness of accounting (financial) and other reports;

- compliance with applicable laws and regulations, as well as the Company's internal regulations.

A **Risk Owner** is a person (First Deputy General Director, Deputy General Director, Director, Head of Structural Unit) who has the authority and responsibility for risk management.

The Rosseti Group of Companies (Companies of the Rosseti Group) is

Rosseti PJSC and its subsidiaries.

A Risk Source (Risk Factor) is an object, situation or action that, alone or in combination, may entail a risk.

Control Procedures (internal control procedures) are actions and measures aimed at preventing and identifying deviations, errors and abuses, as well as providing reasonable confidence that the risk response is carried out effectively, in a timely manner, in a consistent manner and reducing the risk level to an acceptable level.

Company is Rosseti Moscow Region PJSC.

Risk Management and Internal Control Department is a structural unit of the Company that is responsible for coordinating and methodological support for risk management and internal control activities.

The Risk Management and Internal Control Department may also be tasked with monitoring/additional control of certain areas of activity subject to significant risks in accordance with the regulation on the department and/or by decision of the Company's management bodies.

Risk Consequences are the result of the impact of an event on the goal achievement.

Preferred Risk (Risk Appetite) is the maximum permissible level of risks that the Company considers acceptable in the process of achieving the Company's goals and is ready to support.

Risk Register is documented information about identified risks.

Risk is the influence of uncertainty on the goal achievement. The influence of uncertainty is understood as a deviation from the expected result. It can be positive and/or negative, and it can create or lead to opportunities and threats. Goals can have different aspects and categories and can be defined at different levels. Risk is often expressed through its sources, potential events, consequences, and probability.

Risk Management and Internal Control System (RMICS) is a set of organizational measures, methods, procedures, corporate culture regulations and actions taken by the Company to achieve an optimal balance between the Company's value growth, profitability and risks, to ensure the Company's financial stability, conduct business effectively, ensure the safety of assets, comply with legislation, the Company's charter and internal documents, and prepare reliable reports in a timely manner.

Risk Management is the coordinated effort to direct, control and manage the Company in a risk-informed manner.

2.2. In order to ensure a common understanding of all aspects of risk management and internal control, and to effectively implement the Policy provisions, the list of terms used by the Company is disclosed in a separate document — the Glossary for Risk Management and Internal Control, approved by the Company's organizational and administrative document.

3. RMICS Goals and Objectives

3.1. The RMICS goal is to provide reasonable confidence in achieving the Company's goals and development strategy of the Rosseti Group of Companies, including ensuring reliable, highquality and affordable energy supply to consumers, as well as the operational goals of the Company's financial and economic activities.

3.2. The RMICS objectives are:

- ensure the Company's economic efficiency, the rational distribution and use of resources and the preservation of assets;

- ensure the completeness, reliability, accuracy and timeliness of the formation, communication/presentation of information and all types of reports of the Company, as required by applicable law and local regulations of the Company;

- ensure compliance with legal requirements applicable to the activities of the Company and the Rosseti Group of Companies, compliance with internal policies, regulations and procedures of the Company;

- ensure the safety of the environment and the safety of employees and third parties in the course of the Company's activities;

- maintain the process of identifying, analyzing and evaluating risks arising at all levels of the Company's management, and effective risk management;

- ensure the development and implementation of effective control procedures to reduce the risks associated with the Company's activities to a level not higher than the Preferred Risk (Risk Appetite);

- ensure effective prevention, detection,

and eliminating violations when the Company carries out its activities and conducts financial and economic transactions;

- ensure protection of the Company's interests and counteract unfair practices of the Company's employees and third parties;

- develop a risk-based corporate culture in the Company;

- provide an information environment for organizing effective risk management and internal control, as well as making balanced management decisions.

3.3. The RMICS goals and objectives may change as the risk management and internal control process develops and improves.

3.4. The RMICS strives to provide reasonable confidence in achieving the Company's goals, but is unable to provide an absolute guarantee of achieving the goals due to functional restrictions. The following restrictions may affect the Company's activities in the field of risk management and internal control (collectively or separately):

- exposure to risks that the Company has no

or very limited influence over. The RMICS is unable to provide reasonable assurance when the Company's activities are significantly influenced by external events;

- subjectivity of judgement — risk decisions are adopted based on human judgement, subject to time constraints based on available information, subject to distortion by employees, and under internal and external pressures (deadlines, requirements, key performance indicators);

- restrictions related to the organization of corporate governance, in which a number of corporate governance issues go beyond the scope of the RMICS, but have a direct impact on the system functioning;

- RMICS failures, which can be caused both by misinterpretation by the RMICS participants of legislation, local regulations, and employee errors due to negligence and insufficient level of competence;

- deliberate violation of RMICS — committing intentional actions in order to conceal (distort) data on risks and risk management measures, failure to implement risk management measures and/or committing illegal actions;

- absence of personal responsibility of the Company's managers and employees for the implementation of significant projects (in addition to those provided for by the legislation of the Russian Federation) enshrined in internal documents.

4. Principles of RMICS Functioning

4.1. The RMICS development and functioning in the Company is carried out on the basis of common principles that are adopted and observed by management bodies and employees at all levels of the Company's management:

4.1.1.<u>Principle of continuity and integrity</u>: risk management and internal control is a continuous, constantly functioning process carried out at all levels of the Company's management. Systematic, regular and consistent management of all types of risks is carried out in all key areas of activity.

4.1.2. <u>Principle of compliance (goal orientation): the</u> RMICS functioning contributes to the achievement of the goals set out in strategic and operational planning documents, such as the Long-term Development Program, the Business Plan and others.

4.1.3.<u>Principle of integration</u>: the RMICS is an integral part of the Company's strategic planning and decision-making system at all levels of management. The RMICS promotes informed decision-making, taking into account the analysis of all available information about the likelihood and consequences of decisions made and possible alternatives to these decisions.

4.1.4.<u>Principle of methodological unity</u>: the Company uses common approaches in force within the Rosseti Group of Companies to organizing the RMICS.

4.1.5.<u>Principle of reasonable confidence</u>: the measures implemented within the RMICS framework are aimed at providing a fairly high, but not absolute guarantee of achieving the Company's goals.

4.1.6.<u>Principle of adaptability</u>: the RMICS functions and develops taking into account changes in external and internal environmental factors.

4.1.7.<u>Principle of efficiency</u>: the RMICS is based on the principle of efficiency (effectiveness and economy) of implementing risk management processes and control procedures, namely: the need to achieve the Company's established goals using the least amount of resources (economy) and/or achieving the best result of the Company's activities using the established amount of resources (effectiveness).

4.1.8.<u>Principle of documentation</u>: reasonable and sufficient documentation and formalization of the main risk management and internal control processes to ensure the effective functioning of the RMICS.

4.1.9.<u>Principle of dynamism</u>: risk management and internal control in the Company are dynamic and responsive to changes.

4.1.10.<u>Principle of information quality</u>: the RMICS functioning

is based on the best available information. At the same time, when making decisions, it is necessary to take into account the quality of the information used, the limitations and assumptions of data sources or methods used for modeling and evaluating risks, and the possible subjectivity of expert opinions.

4.1.11.<u>Principle of prioritization</u>: the priorities for the RMICS development and the distribution of resources within the RMICS framework are determined taking into account the significance of the risks.

4.1.12. Principle of responsibility: the RMICS participants are

responsible for identifying, evaluating, analyzing and continuously monitoring risks as part of its activities, developing and implementing the necessary risk management measures and controls, applying them within its competence, and continuously monitoring the efficiency of risk management measures and controls.

4.1.13.<u>Principle of separation of powers and duties</u>: the powers and duties of the RMICS participants are distributed in such a way as to minimize the risks of mistakes, corruption risks and other offenses.

4.1.14.<u>Principle of cross-functional interaction</u>: risk management processes and control procedures affecting several areas of activity (business processes) or the activities of several structural units are based on collegial decisions taken jointly on the basis of information available to various structural units, taking into account the views of all stakeholders.

4.1.15. Principle of continuous improvement: the Rosseti Group ensures the continuous

improvement and development of the RMICS, taking into account the need to solve new problems and change the internal and external conditions for the Group's functioning.

5. RMICS Participants

5.1. The RMICS participants in the Company are:

- Board of Directors;

- Committees of the Board of Directors within their competence;

- Audit Commission;

- Executive bodies (Management Board of the Company, General Director of the Company);

- Risk owners;

- Managers and employees of structural units;

- Risk Management and Internal Control Department;

- Internal Audit Division.

5.2. The distribution of responsibilities between the RMICS participants is established as follows:

5.2.1. Board of Directors:

- defines principles and approaches to organizing risk management and internal control, including approving internal documents defining risk management and internal control policies;

- approves the preferred risk (risk appetite);

- considers information on the most significant (key) risks;

- on an annual basis reviews the report of the executive bodies on the organization, functioning and efficiency of the RMICS, and also assesses the functioning of this system and gives recommendations for its improvement;

- on an annual basis reviews the results of the internal audit evaluation of the RMICS reliability and efficiency;

- reviews the results of an external independent evaluation of the RMICS efficiency.

5.2.2. The Committees of the Board of Directors, within their competence, analyze information on the most significant (key) risks and pre-consider the functioning of the RMICS before submitting them to a meeting of the Board of Directors. The tasks of the Committees of the Board of Directors are determined by the Regulation on the relevant Committee, approved by the Board of Directors.

5.2.3. Based on the results of the audit, the Audit Commission prepares proposals/recommendations for improving the RMICS.

5.2.4. Executive bodies (Management Board, CEO) ensure the creation, maintenance and development of an effective RMICS, and regularly report to the Board of Directors for the creation and operation of an effective RMICS.

5.2.4.1. Management Board:

- approves the risk register and risk management action plans;

- reviews risk management reports, if necessary, gives recommendations for improving risk management and monitoring measures, and improving control procedures.

5.2.4.2. General Director:

- ensures the creation and maintenance of a control environment that contributes to the effective functioning of the RMICS as part of current activities;

- approves the RMICS internal documents, including the methodology for risk management and internal control, and the RMICS development program, with the exception of documents whose approval is within the competence of the Board of Directors;

- distributes powers, duties and

responsibilities between the Company's managers in the field of risk management and internal control;

- ensures the implementation of decisions of the Board of Directors on the organization and functioning of the RMICS.

5.2.5. Risk owners ensure:

- implementation of the principles of the RMICS functioning;

- timely development, implementation, monitoring and organization of risk management measures;

- timely development, implementation, monitoring, organization

of control procedures;

- timely informing executive bodies about the results of

risk management activities;

- interaction with the Risk Management and Internal Control Department in terms of documents and reports generated as part of the risk management process.

5.2.6. Structural Units:

- identify and evaluate risks, promptly inform direct managers about new risks;

- timely and fully implement control procedures, implement measures aimed at reducing risks;

- develop and update risk management measures;

- develop and implement new control procedures taking into account the identified risks or update existing ones;

- conduct evaluation (self-assessment) of processes (activities) for the need to optimize them to improve the RMICS efficiency and comply with changing environmental and internal conditions, develop proposals for improving the RMICS.

5.2.7. Risk Management and Internal Control Department shall:

- coordinate risk management and internal control processes;

- organize and conduct training for employees in the field of risk management and internal control;

- analyze the risk portfolio and develops proposals for a response strategy and the redistribution of resources in relation to risk management;

- generate risk reports;

- exercise operational control over the risk management process of the structural units;

- carry out control measures in organization and functioning of the RMICS;

- prepare and submit to the executive bodies information on the organization, functioning and efficiency of the RMICS, as well as on other issues provided for by the Policy.

The activities of the Risk Management and Internal Control Department are functionally separated from the activities of structural units that carry out risk management and internal control as part of their operational activities, as well as from activities related to the functions of internal audit.

5.2.8. The Internal Audit Division shall:

- conduct an internal independent evaluation of the RMICS reliability and

efficiency and develops recommendations for improving the efficiency and effectiveness of the RMICS;

- inform the executive bodies, the Audit Commission and the Board of Directors about the RMICS status by annually submitting for review the results of the evaluation of the RMICS reliability and efficiency.

During the implementation of the internal audit function, independence is achieved due to distinguishing the functional and administrative subordination of the internal audit.

5.2.9. The Company's RMICS functions in accordance with the 'three lines of defense' model.

This model means risk management and internal control in the Group's Companies at three levels:

- at the level of management bodies, units and divisions that carry out risk management and internal control due to their functions and official duties — the first line of defense;

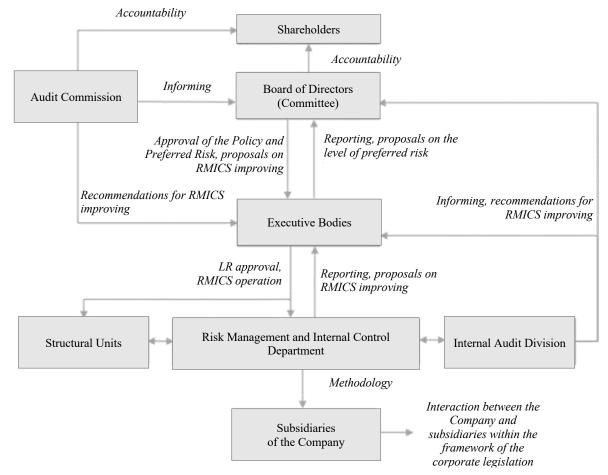
- at the level of control units that monitor / carry out additional control over certain areas of activity subject to significant risks — the second line of defense;

- at the level of the Internal Audit Division — the third line of defense.

6. Cooperation within RMICS Framework

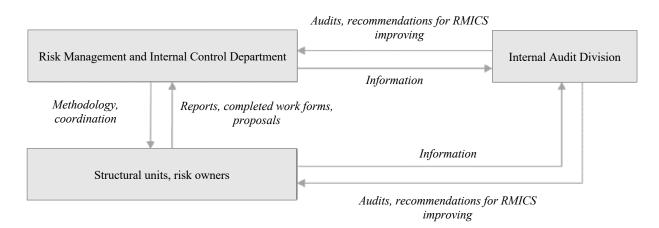
6.1. In order to establish internal mechanisms for information exchange and reporting, Rosseti Group Companies interact vertically and horizontally between the RMICS participants and interact with external stakeholders.

6.2. Interaction between the RMICS participants at different levels of the hierarchy (vertical interaction within the RMICS):



Vertical cooperation within the RMICS framework is carried out taking into account the regulations enshrined in the Policy and in the Company's local regulations governing the activities of the RMICS participants.

Interaction between structural units (horizontal interaction within the RMICS framework):



Horizontal interaction within the RMICS framework is carried out taking into account the regulations enshrined in the Policy and in the Company's local regulations governing the procedure for interaction between the Company's structural units in the process of risk management and internal control.

6.3. The interaction of structural units of the Company within the RMICS framework is carried out in order to resolve cross-functional issues of risk management.

6.4. Interaction with external stakeholders is carried out by the RMICS participants on the basis of local regulations and organizational and administrative documents of the Company, including those determining the information policy and regulating the external communications of the Company.

7. Preferred Risk (Risk Appetite)

7.1. The Company's Preferred Risk (Risk Appetite) is used when making decisions at all levels of management and by all structural units of the Company.

7.2. The procedure for determining and reviewing the Preferred Risk (Risk Appetite) is established by a separate organizational and administrative document approved in accordance with the procedure established by the Company.

7.3. The Risk Management and Internal Control Department is responsible for developing and revising the methodology for determining the level of Preferred Risk (Risk Appetite).

7.4. The Preferred Risk (Risk Appetite) is approved by a decision of the Company's Board of Directors.

7.5. The Preferred Risk (Risk Appetite) indicators are the same for all Companies of the Rosseti Group, while certain indicators of the Company's Preferred Risk (Risk Appetite) can be adjusted taking into account the specifics of the Company's activities.

8. RMICS components

8.1. RMICS is a collection of interrelated components, which include:

- corporate governance and culture;

- strategy and goal setting;

- operational efficiency;
- analysis and revision;
- information, communication and reporting.

8.2.<u>Corporate governance and culture</u> are determined by the attitude of the Company's management bodies to risk management and internal control issues: their understanding of the importance of these issues, ensuring the involvement and awareness of the Company's employees in risk management and internal control issues, and organizing and maintaining an efficient RMICS.

The component creates a control environment that is part of the Company's corporate culture. The control environment includes a set of standards, processes and actions of executive bodies aimed at establishing and maintaining the effective functioning of internal control in the Company, as well as understanding its importance at all levels of management to achieve its goals.

The control environment should contribute to the achievement of RMICS goals by:

- clear understanding by all RMICS participants of their duties and powers, adherence to corporate and ethical values;

- building an organizational structure based on the principles of RMICS functioning and ensuring the effective distribution of duties, delegation of powers, maintenance of qualifications and training of the Company's employees;

- ensuring the independence and objectivity of internal audit.

8.3. The strategy and goal setting give the direction of the Company's development and are

the basis for identifying and evaluating risks and determining the Preferred Risk (Risk Appetite).

The Company adheres to vertical strategic planning approaches and is based on the development strategy of the Rosseti Group companies approved by the Board of Directors of Rosseti PJSC when establishing:

- the Company's long-term goals (with a planning horizon of at least 5 years) approved by the Company's Board of Directors in strategic and policy documents in accordance with the Company's Charter;

- operational goals approved in the Company's short and medium-term planning documents, the achievement of which is ensured by internal control.

The external environment in which the Company achieves the set goals includes (but not limited to):

- social and political, legal, regulatory, financial, economic and technological environment;

- main factors and conditions for the development of the electric power industry;

- relationships with external stakeholders.

The internal environment in which the Company achieves the set goals includes the culture (opinions and attitudes) of the Company's management and employees towards risk management, reflects the Company's values and influences their corporate culture, procedures and rules of operation.

The internal environment includes (but not limited to):

- organizational structure of management and distribution of powers;

- plans and programs that set strategic and operational goals;

- resources and capital (including personnel, competencies, systems and technologies);

- appropriate risk evaluation tools and techniques;

- information systems;
- corporate culture;
- standards and procedures;
- Preferred Risk (Risk Appetite).

8.4.<u>The effectiveness of the Company's activities</u> contributes to the formation of reasonable confidence in the implementation of the strategy and the achievement of its goals.

To ensure the achievement of its goals, the Company identifies and analyzes risks, evaluates risks, responds to risks and carries out control procedures.

8.4.1. Risk Identification and Analysis

Risk identification involves identifying, defining and describing risks (including possible changes in the internal and external environment), their causes and consequences. Risks must be identified regardless of whether Group Companies can influence their causes. Risks are formalized in the form of risk registers.

Risk analysis provides input for evaluating risk and making decisions on how to address those risks and the most appropriate strategies and methods of exposure. Risk analysis involves considering risk factors, their negative and positive consequences, analyzing risk chains, and determining the level of risk.

8.4.2. Risk Evaluation

Risk evaluation is carried out for each identified risk and is aimed at determining the significance of the risk, taking into account the consequences of the risk implementation and the likelihood of its occurrence.

Risk evaluation is carried out using qualitative and quantitative approaches, as well as their combination. The criteria used for the significance of the risk are determined by the Company's local regulations and organizational and administrative documents.

Based on the results of risk identification and evaluation, a risk map is generated that reflects the company's risk profile, and the most significant risks are identified.

8.4.3. Risk Response

Risk response is aimed at minimizing the level of risks and their consequences, meeting the Preferred Risk (Risk Appetite), and maximizing opportunities in achieving the Company's goals

by implementing risk management measures. Risk response is carried out in two stages:

- choice of a method of responding to risks;

- development and implementation of risk management measures.

The Company has identified the following methods for risk response:

- risk rejection: risk aversion or avoidance. This method implies refusal to perform certain actions, refusal from assets characterized by an unacceptable level of risk. Risk rejection as a method of risk coverage is applied in exceptional circumstances and is used when the cost of impact on the risk is too high or such exposure will not reduce the risk to an acceptable level, and when it is impossible or inefficient to transfer the risk to a third party;

- risk reduction: impact on risk by reducing the likelihood of risk realization and/or reducing negative consequences in case of risk realization;

- risk transfer: transfer or partial transfer of risk to another party, which makes it possible to reduce the negative impact of uncertainty on the achievement of the Company's goals. At the same time, it should be noted that some risks are not always transferable;

- risk taking: an informed decision to take a specific risk. The decision to take a risk can be made without affecting the risk or in the process of impacting the risk. The risks taken are subject to monitoring and review.

To respond to a specific risk, one or more of the listed methods can be used.

When choosing a response method, it is necessary to consider:

- risk materiality level;

- impact on the probability and impact of risks, the possibility of new risks emerging;

- costs of implementing risk management measures and the effects obtained;

- availability of competencies and opportunities for risk management;
- compliance with the principles of risk management and internal control.

Risk management measures are methods of impacting the risk aimed at maintaining and/or changing the risk level, and are developed taking into account the chosen risk response method for all significant risks of the Company.

8.4.4. Performing control procedures

The Company ensures the development and implementation of control procedures aimed at achieving the RMICS goals. Control procedures must be carried out in accordance with the Company's local regulations governing the control environment of processes.

8.5.The <u>analysis and revision</u> of risk management and internal control practices is aimed at maintaining the effectiveness and improving the Company's risk management practices: updating information on the Company's risks taking into account changing external and internal factors, ensuring the proper functioning of controls, compliance with legislation, the Company's local regulations, the Company's goals, and best practices in the field of risk management and internal control.

Analysis and review of risk management and internal control practices are carried out during the monitoring of the RMICS to provide reasonable assurance that:

- all significant risks have been identified and fairly evaluated, taking into account changing external and internal environmental factors;

- risk management measures are provided for all significant risks and are carried out in a timely and efficient manner;

- control procedures function properly and ensure a reduction in the level of risks.

Monitoring risk management and the effectiveness of control procedures includes evaluation of the RMICS reliability and efficiency. Monitoring can be carried out in the course of ongoing activities or through periodic inspections, or using a combination of these methods.

Management of risks and effectiveness of control procedures are monitored by the RMICS participants in accordance with the Company's organizational and administrative documents on a periodic basis (at least once a year). As part of the monitoring, external and internal environmental factors are analyzed, risks and their evaluations are reviewed, risk management measures are analyzed for effectiveness and, if necessary, updated, and control procedures are analyzed and

updated.

8.6.<u>Information, communication and reporting</u> regarding the Company's RMICS provide the RMICS participants with the information necessary to make informed and sound decisions and perform their job responsibilities.

The exchange of information must comply with the RMICS principles and confidentiality requirements.

The composition of RMICS reports, the content, and deadlines for their submission are determined by the Company's separate organizational and administrative documents.

9. RMICS Organization

9.1. The Company's risk management and internal control organization is aimed at comprehensive risk management and takes into account the complex structure of the mutual influence of risk factors, risks and their consequences.

9.2. The creation of an effective RMICS, regardless of the scale, type and specifics of the Company's activities, is facilitated by adherence to the common principles of the RMICS functioning. RMICS is organized in subsidiaries on the basis of common group-wide principles and approaches, taking into account the scale, type and specifics of their activities, the organizational characteristics of the subsidiaries, and their contribution to achieving the goals of the Rosseti Group of Companies.

9.3. The processes for ensuring compliance with the requirements of antimonopoly, anticorruption, tax and other legislation (compliance) function as an integral part of the Company's internal control and risk management processes and are aimed at complying with legislation and preventing its violation by the Company.

9.4. The effectiveness of risk management and internal control within individual activities is enhanced by the allocation of key RMICS subsystems, the functioning of which is regulated by external regulatory requirements and/or documents approved at the level of the Company's Board of Directors:

9.4.1. Control over the operation of power grid assets: the subsystem

is designed to monitor the implementation of comprehensive programmes

aimed at improving the reliability and efficiency of the operation of power grid facilities.

9.4.2. Control over the development of power grid assets: the subsystem is aimed at monitoring the Company's investment activities and ensures the balanced development of power grid assets.

9.4.3. Control over services of electricity transmission and technological connection: the subsystem is aimed at controlling the provision of reliable, qualitative and affordable energy supply to consumers.

9.4.4. Financial and economic control: the subsystem is aimed at monitoring the Company's financial and economic activities, achieving financial and operational indicators, and ensuring compliance with the requirements of the tax legislation of the Russian Federation.

9.4.5. Control over management processes and supporting processes: the subsystem ensures control over the implementation of management processes within the framework of strategic, corporate governance, digital transformation management, and other processes.

9.4.6. Control over compliance with labor protection requirements: the subsystem ensures control over compliance of the Company's employees with the requirements of labour protection laws and other regulations, as well as control over compliance with the procedure for investigation and recording of occupational accidents.

9.4.7. Control over compliance with corporate ethics and official conduct: the subsystem ensures control over compliance with the requirements of the Code of Corporate Ethics and Official Conduct and is aimed at maintaining values, principles, rules and regulations of business ethics, as well as standards of conduct that determine relationships within the team, relations with employees, business partners, governmental authorities, and the public.

9.4.8. Anti-corruption control: the subsystem is aimed at implementing a set of measures to prevent corruption that reduce corruption and reputational risks, as well as the risks of applying administrative liability measures to the Company.

9.4.9. Antimonopoly compliance: the subsystem is aimed at ensuring that the Company's activities comply with the requirements of the antimonopoly legislation of the Russian Federation and preventing its violation by the Company.

9.4.10. Control over procurement activities: the subsystem is aimed at ensuring the timeliness of procurement procedures, justifying the quality, quantity and cost of purchased goods and services, and compliance with legislation in the field of procurement activities.

9.4.11. Information security control: the subsystem is aimed at implementing a set of measures to maintain the integrity, availability and confidentiality of the Company's information resources. The subsystem monitors compliance with the requirements of the legislation of the Russian Federation in the field of information security.

9.4.12. Insider information control: the subsystem is aimed at implementing a set of measures to combat the misuse of insider information and/or market manipulation.

9.5. Taking into account organizational changes in the Company, and as the maturity level of RMICS increases, the set of subsystems may be updated.

9.6. The Company maintains a hierarchical three-level structure of RMICS documentation:

- first-level documents established by decisions of the Board of Directors determine the general principles of the RMICS organization and functioning, and apply to all RMICS participants (policies/strategies, etc.);

- second-level documents describe the interrelated processes and activities necessary for the RMICS implementation (regulations/provisions, etc.);

- third-level documents describe in detail the specific actions of individual employees within the RMICS framework (instructions/methods, etc.).

10. Evaluation of RMICS Efficiency

10.1. The Company periodically evaluates efficiency of the RMICS in the current state.

10.2. Forms of evaluating the RMICS efficiency:

- self-assessment;

- internal independent evaluation;

- external independent evaluation.

10.3. Self-assessment of the RMICS efficiency is carried out at least once a year:

- by structural units in functional areas of activity;

- by the Risk Management and Internal Control Department regarding the RMICS functioning in the Company.

The results of a self-assessment of RMICS efficiency are included in the annual report of the Company's executive bodies on the RMICS organization, functioning and efficiency, submitted to the Company's Board of Directors for consideration.

10.4. An internal independent evaluation of the RMICS reliability and efficiency is carried out annually by the internal audit division. The results of evaluation of the RMICS state, reliability and efficiency are submitted to the Company's Board of Directors for consideration.

10.5. An external independent evaluation of the RMICS efficiency is carried out by an external independent consultant at the decision of the Company's management bodies, depending on changes in organizational activities and the overall level of development, reliability and efficiency of RMICS.

The results of an external independent evaluation of the RMICS efficiency are submitted to the Company's Board of Directors for consideration.