

Appendix # 1  
to the decision of the Board of Directors of  
Rosseti Centre, PJSC  
Minutes of 03.07.2024 # 31/24

**Antitrust compliance policy of Rosseti Centre, PJSC**

**Moscow  
2024**

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## Introduction

The antitrust compliance policy of Rosseti Centre, PJSC (hereinafter referred to as the Antitrust Compliance Policy) was developed in order to increase the efficiency of the activities of Rosseti Centre, PJSC (hereinafter also referred to as the Company) in the field of ensuring compliance of the Company's activities with the requirements of the antitrust legislation of the Russian Federation (hereinafter referred to as the antitrust legislation) and implementation of the provisions of Article 9.1 of Federal Law of 26 July 2006 No. 135-FZ "On the Protection of Competition".

The Antitrust Compliance Policy defines:

- requirements for the procedure for assessing the risks of violation of antitrust legislation associated with the Company's implementation of its activities (hereinafter referred to as antitrust risks);
- regulation of antitrust compliance procedures, including measures aimed at reducing antitrust risks by the Company;
- functions of subjects of the antitrust compliance system;
- actions that may lead to a violation of antitrust legislation and which are prohibited by the Company;
- measures aimed at the Company's implementation of control over the functioning of the system of internal compliance with the requirements of antitrust legislation (hereinafter referred to as antitrust compliance);
- the procedure for familiarizing subjects of the antitrust compliance system with the Company's internal documents in the field of antitrust compliance;
- information about the person and department responsible for the functioning of antitrust compliance.

Antitrust compliance is a subsystem of the risk management and internal control system (hereinafter referred to as the RMICS) of the Company and is based on general approaches defined by the Company's internal documents in the field of risk management and internal control, taking into account the features reflected in the Antitrust Compliance Policy.

The Antitrust Compliance Policy applies to all subjects of the Company's antitrust compliance system specified in clause 5.1 of the Antitrust Compliance Policy.

The Antitrust Compliance Policy and changes to it are approved by a decision of the Board of Directors of the Company with preliminary consideration by the Audit Committee of the Boards of Directors of the Company.

In case of amendments to the legislation of the Russian Federation, the Antitrust Compliance Policy is applied to the extent that does not contradict the requirements of the legislation of the Russian Federation.

In furtherance of the provisions of the Antitrust Compliance Policy, internal documents of the Company are approved, necessary for the effective functioning of antitrust compliance, which are developed taking into account:

- legislation of the Russian Federation;
- explanations and recommendations of the antitrust authority;
- goals and objectives of the Company;
- the Company's resources;
- organizational structure of the Company;

- provisions of the Articles of Association of the Company and internal regulations of the Company;
- decisions of the Board of Directors of the Company;
- corporate culture of the Company;
- generally accepted concepts and practices in the field of risk management and internal control.

The person responsible for the functioning of antitrust compliance is the Deputy General Director for Corporate and Legal Activities.

### Concepts and definitions

Antitrust compliance	a system of internal compliance with antitrust legislation requirements
Antitrust authority	Federal antitrust authority and its territorial bodies
Antitrust risk	the risk of violation of antitrust legislation associated with the implementation by the Companies of their activities
Buisness process	a functional area of the Company's activities, responsibility for the organization, coordination or implementation of which is assigned to the heads of the Company's structural divisions.
Company	Public Joint stock company «Rosseti Centre».
Antitrust risk assessment	a process covering the identification, analysis and assessment of antitrust risks
Responsible Unit	The organizational unit of the Company responsible for the functioning of antitrust compliance: a legal support unit and (or) a permanent collegial body that is not an organizational and structural unit, formed from the composition of the Company's employees.
Structural subdivision	an organizational and structural unit of the executive apparatus of Rosseti Centre, PJSC, which is entrusted with the implementation of a certain list of tasks, reporting directly to the General Director, First Deputy General Director-Chief Engineer, and Deputy General Directors in areas.
Antitrust Compliance Policy	a document containing the Company's statement of general intentions, guiding principles and directions of activity in the field of antitrust compliance
Applicable requirements	requirements of antitrust legislation and internal documents of the Company in the field of antitrust compliance applicable to the Company
Worker	a person in labour relations with the Company
Subjects of the antitrust compliance system	Management bodies of the Company, structural divisions, Responsible divisions, members of management bodies, participants in antitrust compliance - employees of the Company who are entrusted with responsibilities for performing certain tasks of antitrust compliance

<p>Risk management and internal control system, the RMICS</p>	<p>A set of organizational measures, methods, procedures, norms of corporate culture and actions taken by the Company to achieve an optimal balance between the growth of the Company's value, profitability and risks, to ensure the financial stability of the Company, efficient conduct of business activities, ensuring the safety of assets, compliance with the legislation of the Russian Federation, the Articles of Association and internal documents of the Company, timely preparation of reliable reporting</p>
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## 1. General provisions

### 1.1 Basis of the Antitrust Compliance Policy

The Antitrust Compliance Policy is developed in accordance with:

#### 1.1.1 Regulatory legal acts of the Russian Federation:

- Federal Law of 26 July 2006 No. 135-FZ “On the Protection of Competition”;
- Federal Law of 17 August 1995 No. 147-FZ “On Natural Monopolies”;
- Federal Law of 29 July 2004 No. 98-FZ “On Trade Secrets”.

1.1.2 The Corporate Governance Code, approved on 21 March 2014 by the Board of Directors of the Bank of Russia and recommended by the Bank of Russia's letter dated 10 April 2014 No. 06-52/2463 “On the Corporate Governance Code” for application by joint stock companies whose securities are admitted to on-exchange trading.

1.1.3 The Explanation “On the system of internal compliance with the requirements of antitrust legislation”, approved by Minutes of the Presidium of the Federal Antitrust Service of Russia dated 2 July 2021 No. 4.

#### 1.1.4 The state standards:

- “GOST R 51901.21-2012. National standard of the Russian Federation. Risk management. Risk register. General provisions”, approved by Order of Rosstandart dated 29 November 2012 No. 1285-st;
- “GOST R 51901.22-2012. National standard of the Russian Federation. Risk management. Risk register. Rules of construction”, approved by Order of Rosstandart dated 29 November 2012 No. 1285-st;
- “GOST R 51901.23-2012. National standard of the Russian Federation. Risk management. Risk register. Guidelines for assessing the risk of hazardous events for inclusion in the risk register”, approved by Order of Rosstandart dated 29 November 2012 No. 1285-st;
- “GOST R 58771-2019. National standard of the Russian Federation. Risk management. Risk assessment technologies”, approved by Order of Rosstandart dated 17 December 2019 No. 1405-st;
- “GOST R ISO 31000-2019. National standard of the Russian Federation. Risk management. Principles and guidance”, approved by Order of Rosstandart dated 10 December 2019 No. 1379-st;
- “GOST R 51897-2021 (ISO Guide 73:2009) “Risk management - Vocabulary”, approved by Order of Rosstandart dated 11 November 2021 No. 1489-st.

#### 1.1.5 Internal documents of the Company.

The sources that determine the procedure for functioning of the Antitrust Compliance in the Company and the exercise of the rights and obligations of the subjects of the antitrust compliance system also include:

- decisions and orders of the antitrust authority adopted/issued in relation to the Company;
- warnings about the inadmissibility of violation of antitrust legislation by officials of the Company;
- warnings about the Company's termination of actions (inactions) that contain signs of violation of antitrust legislation;
- decisions and orders of the antitrust authority, accepted/issued in relation to business entities occupying a dominant position in the product market;
- current requirements of the antitrust authority for the regular provision of information (monitoring);
- judicial acts adopted in relation to the Company;
- judicial acts adopted in relation to business entities occupying a dominant position in the product market;
- voluntary obligations assumed by the Company.

## **1.2 Goals, objectives and principles of antitrust compliance**

### **1.2.1 Objectives of antitrust compliance**

The objectives of antitrust compliance are:

- compliance by the Company with antitrust legislation and development of measures to prevent its violation;
  - identification and suppression of violations of antitrust legislation in the activities of the Company;
  - ensuring compliance by subjects of the antitrust compliance system with the requirements of antitrust legislation and internal documents in the field of antitrust compliance;
  - providing an information environment for organizing effective management of antitrust risks, as well as making decisions in the field of antitrust compliance.

### **1.2.2 Objectives of antitrust compliance:**

- adoption and implementation of internal documents of the Company containing requirements for antitrust compliance;
- risk management of violation of antitrust legislation: identification and analysis of risks, risk assessment, response to risks, including the implementation of a system of comprehensive prevention of violations of antitrust legislation, and monitoring;
- determination and implementation of measures to control the functioning of antitrust compliance;
- training, familiarization of subjects of the antitrust compliance system with the internal documents of the Company in the field of antitrust compliance in order to comply with the requirements of antitrust legislation;
- formation of the organizational structure of the Company taking into account the requirements of antitrust compliance, including the determination of the Responsible Unit and the person responsible for the functioning of antitrust compliance in the Company;

- assessment of the effectiveness of functioning and improvement of the Company's antitrust compliance.

### **1.2.3 Principles of antitrust compliance:**

- the interest of the Company's management in the effectiveness of the functioning of antitrust compliance, as well as the involvement of the Company's employees in the implementation of the provisions of the Antitrust Compliance Policy;
- regular assessment of the risks of violation of antitrust legislation;
- continuity of the functioning of antitrust compliance, as well as continuous improvement and increase in the effectiveness of antitrust compliance.

## **2. Antitrust risk assessment**

### **2.1 Goals of antitrust risk assessment**

The purpose of assessing antitrust risks is to identify antitrust risks, analyze and evaluate antitrust risks to develop and implement measures to reduce them, as well as evaluate the effectiveness of such measures.

### **2.2 Stages of antitrust risk assessment**

Antitrust risks are assessed in three successive stages:

- 1) identification of antitrust risks - identification of factors (signs) of antitrust risks in the Company's business processes and their description;
- 2) analysis of antitrust risks - studying the influence of factors on antitrust risk, identifying the consequences and their impact on the activities of the Company;
- 3) assessment of antitrust risks - measuring the likelihood of the implementation of antitrust risks, the magnitude of the consequences of their implementation, the level of antitrust risks, including to determine the admissibility or acceptability of the antitrust risk.

### **2.3 Basis for assessing antitrust risks**

Antitrust compliance is carried out through monitoring and management of antitrust risks and decisions of authorized government bodies, which make it possible to determine a list of measures aimed at preventing the implementation of such risks, suppressing violations, and obtaining the desired results from the implementation of such measures.

Antitrust risks are assessed regularly on a scheduled basis, as well as unscheduled. An unscheduled assessment of antitrust risks can be carried out when business processes change, the start of work in new product markets or the Company's exit from the product market, changes in the organizational (managerial) structure or strategy (goals, directions) of the Company's activities, significant changes in the market situation, changes in legal regulation, identifying violations of applicable requirements in the Company's activities.

When identifying antitrust risks, the following methods can be used:

- statistical – a set of interrelated techniques for studying data on violations of antitrust legislation in order to obtain quantitative characteristics and identify general patterns of violations of antitrust legislation;
- analytical – analysis and comparison of the Company's activities with the prohibitions contained in the antitrust legislation in order to identify the most likely violations of the antitrust legislation;

- a method of analogies (comparative) – a set of techniques aimed at analyzing and comparing violations of antitrust legislation in the activities of business entities engaged in the same activities in order to identify similar risks;
- a modelling method - a set of techniques aimed at creating a model of action (managerial decision) of the Company, which may have signs of violation of antitrust legislation and conducting an analysis of the negative consequences as a result of such action;
- a historical method - analysis and identification of elements of antitrust risks in the Company's law enforcement practice for a period of at least three years before the date as of which the assessment of antitrust risk is carried out;
- an expert method - analysis of information collected from employees, divisions and management bodies of the Company who have special knowledge and information in their areas of competence.

#### **2.4 Implementation of antitrust risk assessment**

All identified antitrust risks are subject to assessment. The choice of a specific method for assessing antitrust risk and metrics is carried out depending on the type of risk, the required accuracy of antitrust risk assessment, available resources, and recommendations of regulatory authorities.

Antitrust risks are assessed in the manner determined by the sole executive body. The horizon for assessing antitrust risks is one financial year.

The methodology for assessing antitrust risks, including a description of the scales of probability and consequences, is approved by a separate organizational and administrative document.

#### **2.5 Result of antitrust risk assessment**

The result of assessing antitrust risks is to determine the level of significance of antitrust risks, taking into account the likelihood of their implementation and the level of consequences. The overall assessment of the risk of violation of antitrust legislation is included in the Company's registers and risk maps, the forms of which are approved by separate organizational and administrative documents of the Company. Antitrust risks of business processes are described in the risk matrices and control procedures of the corresponding business processes.

### **3. Reducing antitrust risks**

#### **3.1 Goals of measures to reduce antitrust risks**

Measures to reduce antitrust risks are applied to minimize the likelihood of their implementation and the occurrence of negative consequences for the Company, including by:

- requirements from subjects of the antitrust compliance system and third parties of lawful behaviour, thereby ensuring compliance with antitrust legislation;
- identifying and eliminating the causes and conditions conducive to the implementation of antitrust risks.

#### **3.2 A system of measures to reduce antitrust risks**

3.2.1 To reduce antitrust risks, all or part of the measures listed below to reduce antitrust risks can be used.

3.2.2 Ensuring compliance with antitrust legislation requirements of the types of activities of the Company subject to antitrust risks, including through:

- improvement of the Company’s internal documents, automation and standardization of processes that may entail the implementation of antitrust risks;
- control over the interaction of the Company and its employees with third parties as part of participation in professional, trade associations and other associations of legal entities.

3.2.3 Information support, within the framework of which the Company:

- introduces subjects of the antitrust compliance system to the Antitrust Compliance Policy and other internal documents of the Company in the field of antitrust compliance;
- posts information on the adoption of the Antitrust Compliance Policy and other internal documents of the Company in the field of antitrust compliance on the Internet information and telecommunications network (hereinafter referred to as the Internet);
- clarifies applicable requirements, including in the form of consultations and guidelines;
- organizes training for subjects of the antitrust compliance system to implement applicable requirements in the field of antitrust compliance;
- checks the knowledge of the Company’s employees in the field of applicable requirements;
- introduces the Company’s employees to changes in antitrust legislation, clarifications of antitrust authorities and the practice of applying antitrust legislation;
- informs representatives and counterparties of the Company about the Company’s antitrust compliance, as well as the need to comply with antitrust legislation.

3.2.4 Preventive measures to prevent violations, within the framework of which the Company:

- Checks contractors, representatives of the Company, employees of the Company (including potential ones), associations of legal entities of which the Company is a member or of which the Company intends to join as a member for their compliance with the requirements of antitrust legislation;
- checks transactions aimed at reorganizing the Company in the form of merger or accession for their compliance with the requirements of antitrust legislation;
- regulates the procedure for making decisions on interaction with persons in relation to whom information related to antitrust risks has been identified.

3.2.5 Incentives for compliance with antitrust legislation, within the framework of which the Company:

- encourages subjects of the antitrust compliance system for compliance with antitrust laws and (or) active assistance in the functioning of antitrust compliance in the manner prescribed by the Company;
- includes requirements in the field of antitrust compliance in job descriptions and employment contracts of employees, as well as in regulations on the Company’s divisions;
- brings to disciplinary and civil liability for actions (inactions) that led to violation of applicable requirements;

- conducts repeated and additional training in the field of antitrust compliance for employees who committed actions (allowed inaction) that led to a violation of applicable requirements;

- guarantees compliance with the rights of subjects of the antitrust compliance system in the field of antitrust compliance.

3.2.6 Monitoring compliance with antitrust legislation, within the framework of which the Company:

- conducts a legal examination for compliance with antitrust legislation of planned decisions, actions, transactions and draft internal documents, correspondence on issues of antitrust legislation and antitrust compliance, as well as public statements of its representatives and other interaction with the media;

- considers messages about signs of violation of applicable requirements, and also organizes the functioning of channels for receiving such messages;

- conducts internal audits of compliance with antitrust laws;

- carries out inspections of violations of antitrust legislation;

- takes measures to respond to violations of antitrust legislation committed by the Company's employees.

3.2.7 Interaction with state authorities and local governments, within the framework of which the Company:

- controls the procedure for sending information at the request of state authorities and local governments;

- establishes the procedure for interaction with state authorities and local governments when they carry out control activities (inspections);

- regulates the procedure for protecting the interests of the Company in judicial and administrative bodies when considering cases involving the Company;

- establishes and controls the procedure for sending information to antitrust authorities in the event of identifying signs of violation of antitrust legislation, including by counterparties, state authorities and local governments, as well as other persons.

3.2.8 Other measures to reduce antitrust risks, including those applied as part of the management of other types of risks of the Company.

### **3.3 Identification, planning and implementation of measures to reduce antitrust risks**

3.3.1. For each identified risk, a risk response method must be determined, risk management measures and corresponding control procedures (risk mitigation measures) must be developed.

3.3.2. Measures to reduce antitrust risks are defined and included in the following documents:

- The Action Plan for risk management;

- The Certificate of the risk of violation of antitrust legislation;

- The Matrices of risks and control procedures of business processes.

## **4. Monitoring antitrust compliance, assessing its effectiveness**

#### **4.1 Goals of control measures, as well as assessing the effectiveness of antitrust compliance**

Control measures, as well as assessment of the effectiveness of antitrust compliance, are used to confirm the effectiveness of measures to reduce antitrust risks and the entire antitrust compliance system.

#### **4.2 A system of control measures**

The Company constantly monitors the functioning of antitrust compliance.

Control over the functioning of antitrust compliance involves the implementation of the following measures:

- monitoring the functioning of antitrust compliance (monitoring the organization of the risk assessment process and internal control for preventing the implementation of risks, monitoring the training of the Company's employees, assessing the effectiveness of measures to reduce antitrust risks, self-assessment of the effectiveness of antitrust compliance, etc.);
- reporting on the functioning of antitrust compliance (a report on the functioning of antitrust compliance, a report on the risks of violating antitrust legislation, a report on the effectiveness of antitrust compliance are provided to the Company's management bodies in the manner and within the time limits established in the Company's internal documents);
- improving antitrust compliance;
- monitoring changes in legislation applicable to the Company.

#### **4.3 Implementation of control measures**

Control measures are implemented on an ongoing basis in the forms, on time and in the manner established by the Company, and include:

- control over the organization of the risk assessment process and internal control to prevent the realization of risks;
- monitoring the implementation of measures to reduce antitrust risks;
- checking messages received on the Company's information channel about violations of antitrust legislation;
- control of training of the Company's employees on the requirements of antitrust legislation;
- analysis of the effectiveness of measures to reduce antitrust risks;
- self-assessment of the effectiveness of antitrust compliance.

#### **4.4 Assessing the effectiveness of antitrust compliance**

Assessing the effectiveness of antitrust compliance involves monitoring the functioning of antitrust compliance through monitoring the implementation of measures to reduce antitrust risks, checking information about violations of applicable requirements, internal audit, self-assessment of the effectiveness of antitrust compliance, and external independent monitoring.

The procedure for monitoring the functioning of antitrust compliance is approved by separate organizational and administrative documents of the Company.

The Company has organized and operates an internal audit unit, which carries out its activities in accordance with the regulatory and methodological documents of the Company governing the activities of internal audit. The competencies of the internal audit unit in the

field of assessing the effectiveness of antitrust compliance are specified in paragraph 5.2.13 of the Antitrust Compliance Policy.

## **5. Organizational structure of antitrust compliance**

### **5.1 Subjects of the antitrust compliance system**

The subjects of the antitrust compliance system are:

- Board of Directors of the Company;
- Audit Committee of the Board of Directors of the Company;
- Board of the Company;
- General Director of the Company;
- Deputy General Director for Corporate and Legal Activities of the Company;
- Responsible unit;
- Legal Support Division;
- Security Division;
- Risk Management and Internal Control Division;
- Human Resources Division;
- Organizational Design Division;
- Information Policy Division;
- Internal Audit Division;
- heads of structural divisions of the Company;
- employees of the Company.

### **5.2 Distribution of responsibilities among the subjects of the antitrust compliance system.**

5.2.1 The Board of Directors determines the principles and approaches to organizing antitrust compliance, approves the Antitrust Compliance Policy, as well as changes to it.

5.2.2 The Audit Committee of the Board of Directors, in order to ensure compliance with the procedures ensuring the Company's compliance with legal requirements, preliminarily reviews the draft Antitrust Compliance Policy and changes made to it before approval by the Board of Directors.

5.2.3 The Management Board, prior to approval by the Board of Directors, considers and makes recommendations to the Board of Directors on the issue of approval of the Antitrust Compliance Policy and changes made to it.

5.2.4 The General Director:

- organizes and controls the ongoing work of the internal compliance system with the requirements of antitrust legislation on issues not within the competence of the Board of Directors, including determining the Responsible Unit;
- approves the Company's internal documents regulating the implementation of antitrust compliance, including the methodology for assessing and reducing antitrust risks, with the exception of the Company's internal documents, the approval of which falls within the competence of the Company's Board of Directors;
- distributes powers, duties and responsibilities between antitrust compliance participants for antitrust compliance procedures;

- ensures the development of target indicators in the field of antitrust compliance;
- stimulates the implementation of antitrust compliance requirements, including establishing liability for violation of these requirements;
- considers the organization, functioning and effectiveness of the RMICS, the results of assessments of the effectiveness of antitrust compliance, ensures its improvement, takes measures to eliminate shortcomings and monitors the elimination of these shortcomings;
- makes decisions on increasing the effectiveness of antitrust compliance.

5.2.5 The Deputy General Director for Corporate and Legal Activities is the person responsible for the functioning of antitrust compliance.

- organizes the development and submits for approval to the management bodies the Company's internal regulations in the field of antitrust compliance, and also ensures the timely updating of these regulations;
- informs the General Director about the implementation of antitrust compliance and on other issues provided for by the Antitrust Compliance Policy, including internal documents and decisions that may entail antitrust risks;
- organizes the work of the Responsible Unit for the implementation of antitrust compliance;
- organizes assessment of antitrust risks;
- organizes interaction of the Responsible Unit with subjects of the antitrust compliance system and structural divisions of the Company, as well as other persons on antitrust compliance issues;
- organizes control over the functioning of antitrust compliance;
- carries out other functions in the field of antitrust compliance established by the internal regulations of the Company.

5.2.6 The Responsible Unit:

- develops internal regulations of the Company in the field of antitrust compliance;
- together with interested structural divisions, identifies and assesses antitrust risks, creates a risk certificate for violating antitrust laws;
- participates in the coordination of risk matrices and control procedures of business processes containing information about antitrust risks;
- develops measures to reduce antitrust risks, implements them in its part and monitors the implementation of antitrust compliance by other entities;
- monitors antitrust legislation, recommendations of regulators and law enforcement practice and informs the Company's employees about changes in the requirements of antitrust legislation and the practice of its application;
- organizes information support in the field of antitrust compliance, including consulting, providing training and methodological support;
- brings information about violations of applicable requirements committed by subjects of the antitrust compliance system to the Deputy General Director for Corporate and Legal Activities and prepares proposals on measures of liability for violations committed;

- organizes the functioning of channels for receiving information about signs of violation of applicable requirements, organizes the receipt and consideration of messages in the manner approved by a separate organizational and administrative document of the Company;

- organizes internal audits of compliance with applicable requirements;
- interacts with state authorities and local governments on issues compliance with applicable requirements assigned to the Responsible Unit;

- provides the Deputy General Director for Corporate and Legal Activities with proposals for automation and standardization of control procedures for the purposes of implementing antitrust compliance;

- carries out control activities;

- coordinates the activities of subjects of the antitrust compliance system in the field of antitrust compliance;

- advises subjects of the antitrust compliance system on issues of compliance with applicable legislation;

- carries out other functions related to the organization and improvement of antitrust compliance;

5.2.7 The Legal support division:

- in cases and in the manner provided for by the internal regulations of the Company, conducts a legal examination of decisions, agreements, acts and other materials adopted on behalf of the Company for compliance with the requirements of antitrust legislation;

- manages antitrust risks during litigation.

5.2.8 The Security department:

- organizes verification of the reliability of the subjects of transactions;

- in cases determined by the Company's internal regulations, participates in inspections of compliance with applicable requirements, as well as preventive measures specified in clause 3.2.4 Antitrust compliance policies.

5.2.9 The Risk management and internal control division:

- reflects the results of an aggregate assessment of the risk of violation of antitrust legislation received from the risk owner in the Company's risk register;

- takes into account measures to reduce the risk of violation of antitrust legislation when drawing up the Company's Risk Management Action Plan, agreeing on risk matrices and control procedures for relevant business processes;

- participates in the coordination of draft internal regulations of the Company in the field of antitrust compliance for compliance with the requirements of the Company's acts in the field of RMICS;

- within its competence, prepares recommendations for eliminating antitrust compliance deficiencies identified during internal audits.

5.2.10 The HR department:

- ensures that the Company's employees are familiarized with the Company's internal regulations in the field of antitrust compliance;

- organizes training procedures for the Company's employees in the field of antitrust compliance.

5.2.11 The Organizational design unit:

- provides incentives for the Company’s employees to report violations and holds them accountable in the event of identified violations of antitrust rules.

#### 5.2.12 The Information policy division:

- ensures the publication of information about antitrust compliance on the Company’s platforms (internal corporate portal, website, etc.);
- coordinates draft press releases and other information materials with the Responsible Unit.

#### 5.2.13 The Internal audit division:

- participates in the approval of draft internal regulations of the Company in the field of antitrust compliance for their compliance with the requirements of regulatory and methodological documents in the field of issues of functioning of the internal audit unit;
- considers the results of the assessment of antitrust risks reflected in the Company’s risk register, risk matrices and control procedures of relevant business processes, information on the implementation of the Company’s Risk Management Action Plan (in terms of the risk of violation of antitrust legislation) when drawing up the Work Plan of the internal audit unit for the next reporting period , as well as in the formation of audit assignments and internal audit programs of the Company;
- within its competence, prepares recommendations for eliminating antitrust compliance deficiencies identified during internal audits.

5.2.14 Heads of structural divisions, including, but not limited to, divisions responsible for organizing procurement activities, activities for the provision of services for the transmission of electricity and grid connection, activities for corporate governance and property management of the Company and other actions subject to state control economic concentration:

- assist the Responsible Unit in assessing antitrust risks, including providing information upon their requests;
- ensure the identification and description of antitrust risks in risk matrices and control procedures of supervised business processes;
- participate in the development and implementation of measures to reduce antitrust risks in supervised business processes;
- ensure the implementation of measures to reduce antitrust risks in supervised business processes;
- organize and provide control procedures in their areas of responsibility in accordance with the internal regulations of the Company and assist in the implementation of control measures recommended by the Responsible Unit after assessing risks and/or control measures;
- consider reports of violations, respond to requests from the Responsible Unit when conducting inspections in the Company.

5.2.15 Owners of business processes are responsible for compliance with specific legal requirements related to them, are responsible for assessing the risks in the supervised business processes and for implementing measures to minimize risks in the area of responsibility.

#### 5.2.16 Workers:

- comply with applicable requirements and also carry out antitrust compliance procedures within their competence;

- inform the immediate heads of departments about identified antitrust risks in business processes;
- undergo antitrust compliance training;
- inform immediate managers and the Responsible Unit about issues, problems and shortcomings related to the implementation of applicable antitrust laws, as well as antitrust compliance;
- assist the Responsible Unit in conducting inspections.

## **6. Unacceptable practices of employee behaviour when performing operations and functions of business processes**

The Company declares its commitment to compliance with antitrust laws.

It is prohibited for employees to carry out actions (inactions) that lead to violation of applicable requirements.

If facts of unacceptable practices are revealed when performing operations or functions of business processes, the Company's employees are held accountable subject to the establishment of the guilt of the employee who committed the violation, which can be expressed both in the form of intent and in the form of negligence. The list of unacceptable practices is not exhaustive.

### **6.1 Unacceptable practices in procurement activities**

When employees carry out procurement activities, it is not allowed, including (but not limited to):

- unreasonable establishment of competition-limiting requirements and evaluation criteria for procurement participants;
- imposing on the counterparty contract terms that are unfavourable for him or not related to the subject of the contract (economically or technologically unjustified and (or) not directly provided for by federal laws, regulatory legal acts of the President of the Russian Federation, regulatory legal acts of the Government of the Russian Federation, regulatory legal acts of authorized federal bodies executive power or judicial acts of the requirement for the transfer of financial assets, other property, including property rights, as well as agreement to enter into a contract subject to the inclusion of provisions regarding goods in which the counterparty is not interested, and other requirements);
- unreasonable inclusion in the lot of goods (works, services) that are technologically and functionally unrelated to goods, works, services, supplies, implementation, provision of which are the subject of competitive procurement;
- unreasonable conclusion of contracts with a single supplier (contractor, performer), including through fragmentation of purchases;
- coordination of the activities of procurement participants differently than provided for by the current legislation of the Russian Federation, the Unified Procurement Standard of PJSC Rosseti, the procurement notice and (or) procurement documentation, as well as concluding agreements with participants in procurement procedures, if such agreements are aimed at or lead or may lead to restriction of competition and (or) the creation of preferential conditions for any specific participants, unless otherwise provided by the legislation of the Russian Federation.

## **6.2 Unacceptable practices when the Company carries out grid connection activities**

When carrying out grid connection activities, abuse of a dominant position is not permitted, including (but not limited to) by:

- providing an unjustified refusal to consider an application for grid connection;
- violation of the deadlines for consideration of an application for grid connection;
- imposing unfavourable conditions of a grid connection agreement that are not related to the subject of the agreement or not provided for by law;
- violations of the procedure for calculating and applying fees for grid connection;
- providing an unjustified refusal or avoidance of concluding a grid connection agreement;
- violation of deadlines for sending a grid connection agreement;
- violation of grid connection deadlines;
- violation of deadlines for processing documents on grid connection.

## **6.3 Unacceptable practices when the Company carries out activities related to the transmission of electrical energy**

When carrying out activities related to the transmission of electrical energy, abuse of a dominant position is not permitted, including (but not limited to) by:

- incorrect determination of the period, volume and cost of non-contractual consumption of electrical energy;
- incorrect determination of the period, volume and cost of non-metered consumption of electrical energy;
- violation of the procedure (terms) for concluding, amending or terminating contracts for the provision of services for the transmission of electrical energy;
- violation of the procedure for introducing a regime for limiting the consumption of electrical energy, including inaction aimed at delaying the procedure for introducing a regime for limiting the consumption of electrical energy, and the unreasonable introduction of a limitation for the regime for limiting the consumption of electrical energy;
- drawing up certificates on non-metered or non-contractual consumption of electrical energy in the absence of appropriate evidence and (or) in violation of the procedure for their preparation;
- imposing unfavourable terms of the contract for the provision of services for the transmission of electrical energy;
- providing an unjustified refusal or avoidance of concluding a contract for the provision of services for the transmission of electrical energy and power with a consumer of services for the transmission of electrical energy, including an adjacent grid organization;
- creating discriminatory conditions;
- violation of the pricing procedure established by regulatory legal acts.

## **6.4 Unacceptable practices in the interaction of the Company with state control (supervision) bodies**

When interacting with state control (supervision) bodies in the field of antitrust regulation, it is not allowed, including (but not limited to):

- failure to provide, untimely provision or provision of false information at the motivated request of the Antitrust authority or the prosecutor's office;
- failure to comply within the prescribed period with a legal decision, order, representation of the Antitrust body, prosecutors and other bodies;
- ignoring the warning of the Antitrust authority or the prosecutor's office about the inadmissibility of committing actions that could lead to a violation of antitrust legislation;
- obstructing access to the territory or premises of the Company during an inspection in the manner prescribed by law;
- failure to take measures to eliminate the causes and conditions that contributed to the commission of an administrative offense.

### **6.5 Unacceptable practices when the Company carries out transactions and other actions subject to control over economic concentration**

When making transactions or other actions subject to control over economic concentration, it is not permitted, including (but not limited to):

- failure to obtain the preliminary consent of the Antitrust authority to carry out a transaction of economic concentration or other action requiring appropriate approval;
- violation of the procedure for submitting an application for consent to carry out a transaction or other action;
- submitting a petition for consent to carry out a transaction or other action containing deliberately false information;
- carrying out a transaction in violation of the procedure for notifying the Antitrust authority;
- untimely notification of the Antitrust authority about the implementation of a transaction or other action subject to state control;
- submission to the Antitrust authority of a notification about the implementation of a transaction or other action containing deliberately false information;
- failure to comply with an order of the Antitrust authority issued simultaneously with the decision to approve a transaction (carrying out an action);
- failure to comply within the prescribed period with a decision or order of the Antitrust authority issued during the exercise of state control over economic concentration.

### **6.6 Unacceptable practices when disseminating public information**

When making public statements by the Company's management and (or) employees, publications in the media, as well as other forms of public dissemination of information, employees are not allowed, including (but not limited to):

- public statements and statements that allow comparison with competitors and (or) their services by using the words "single", "best", "first", "number one", "most", other words or designations that create the impression of superiority services and (or) the Company without indicating specific characteristics or comparison parameters that have objective confirmation (except for cases where there is objective confirmation of the relevant

facts, for example, the Company was the first on the Russian market to use a new technology);

- publication of information on the Company’s website on the Internet (hereinafter referred to as the Company’s website) and (or) sending letters to counterparties, competitors of the Company regarding the activities of the Company’s competitors.

### **6.7 Unacceptable practices when interacting with counterparties, competitors and government authorities**

When interacting with subjects of the antitrust compliance system with counterparties, competitors and government authorities, it is not permitted, including (but not limited to):

- establishing and (or) maintaining a monopolistically high or monopolistically low level of prices for goods (work, services) not related to the regulated types of activity of the Company;

- imposing on the counterparty the terms of the contract that are unfavourable for him or not related to the subject of the contract (economically or technologically not justified and (or) not directly provided for by law and by-laws, as well as agreement to enter into a contract subject to the inclusion of provisions regarding the goods, including in which the counterparty is not interested, and other requirements);

- economically, technologically and otherwise unjustified establishment of different prices for the same product, unless otherwise established by federal law;

- creation of discriminatory conditions for counterparties;

- violation of the pricing procedure for goods (work, services) related to regulated activities;

- providing an unjustified refusal to conclude or execute a contract;

- use in internal and external business correspondence, as well as in other forms of communication, of words and expressions that may be further interpreted as a violation of antitrust prohibitions (including the conclusion of an anti-competitive agreement, abuse of a dominant position);

- concluding oral and (or) written anti-competitive agreements with competitors or counterparties, as well as the subsequent implementation of anti-competitive agreements;

- implementation of anti-competitive concerted actions;

- conclusion in oral and (or) written form of anti-competitive agreements with state authorities and local governments, as well as their subsequent implementation;

- concluding a lease agreement for state or municipal property without holding a tender;

- actions for the sale, exchange or other introduction of goods into circulation, if the results of intellectual activity, including means of individualization of another legal entity, were used illegally.

## **7. Familiarization of subjects of the antitrust compliance system with the internal documents of the Company in the field of antitrust compliance**

Employees’ familiarization with the Company’s internal documents on antitrust compliance is ensured by the employee’s immediate supervisor by providing the employee with access to electronic copies of the Antitrust Compliance Policy, other internal

documents of the Company in the field of antitrust compliance, including methods for assessing antitrust risks, the procedure for monitoring the functioning of antitrust compliance, the procedure for considering reports of violations in the field of antitrust compliance. Newly hired employees of the Company must be familiarized with the Antitrust Compliance Policy and other internal documents of the Company in the field of antitrust compliance on their first working day.

Familiarization of members of management bodies with the Company's internal documents on antitrust compliance is ensured by employees authorized to do so in accordance with the organizational and administrative document of the Company by providing employees with access to electronic copies of the Antitrust Compliance Policy, other internal documents of the Company in the field of antitrust compliance, including assessment methods antitrust risks, the procedure for monitoring the functioning of antitrust compliance, the procedure for considering reports of violations in the field of antitrust compliance.

#### **8. Publication of information on antitrust compliance**

Information on approval and amendment of the Antitrust Compliance Policy is subject to posting on the Company's website.

The list of organizational and administrative documents of the Company (their individual provisions) containing mandatory requirements, the assessment of compliance with which is carried out within the framework of state control (supervision), bringing to administrative responsibility, can also be posted on the Company's website.

Persons who are not employees of the Company or its subsidiary are given the opportunity to confidentially and, if desired, anonymously report possible violations to the Hotline. The procedure for receiving, processing and considering these requests is regulated by the internal organizational and administrative documents of the Company.