

Appendix # 3  
to the decision of the Board of Directors  
of Rosseti Centre, PJSC  
Minutes dated 30 April 2025 # 14/25

**THE HUMAN RIGHTS POLICY  
OF PUBLIC JOINT STOCK COMPANY  
«ROSSETI CENTRE»**

city of Moscow  
2025

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## **1. General Provisions**

1.1. The Human Rights Policy of Public Joint stock company «Rosseti Centre» (hereinafter referred to as the Policy) is a fundamental internal document of Public Joint stock company «Rosseti Centre» (hereinafter referred to as the Company), establishing the principles and obligations of the Company with respect to the observance of human rights, as well as the mechanisms and procedures for monitoring their observance.

1.2. This Policy has been developed in accordance with the legislation of the Russian Federation, the Human Rights Policy of PJSC Rosseti, the Articles of Association and internal documents of the Company, as well as international and national initiatives in the field of human rights, labour protection and health, and business ethics.

1.3. By this Policy, the Company confirms its responsibility for the observance of human rights enshrined in:

- the Constitution of the Russian Federation;
- the Labour Code of the Russian Federation;
- the International Bill of Human Rights, which includes the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;
- the UN Global Compact and the Guiding Principles on Business and Human Rights;
- the UN Declaration on the Rights of Indigenous Peoples;
- the UN Convention on the Elimination of All Forms of Discrimination against Women and the Convention on the Rights of the Child;
- the fundamental conventions of the International Labour Organization (ILO) and the ILO Declaration on Fundamental Principles and Rights at Work;
- the Social Charter of Russian Business;
- GOST R ISO 26000-2012 Guidance on social responsibility (ISO 26000:2010).

1.4. This Policy applies to all types of activities and business processes carried out by the Company without exception.

1.5. Employees of the Company are obliged to be guided by this Policy.

1.6. The Company calls upon its partners, suppliers and contractors, consumers and other stakeholders to respect internationally recognized human rights, adhere to the principles of this Policy and extend the provisions of this Policy to all its employees, partners, suppliers and contractors, consumers and other stakeholders by introducing relevant provisions into its internal documents.

1.7. This Policy, as well as amendments to it, shall be approved by a decision of the Board of Directors of the Company.

## **2. Purpose and objectives of the Policy**

2.1. The purpose of this Policy is to establish uniform principles, approaches and procedures aimed at protecting human rights and determining a responsible approach

to protecting human rights and freedoms, taking into account the specifics of the Company's activities.

2.2. The achievement of the objectives of the Policy is ensured by solving the following tasks:

- defining the basic principles and obligations of the Company with regard to the observance and protection of human rights;
- definition of the main mechanisms ensuring the observance and protection of human rights by Company;
- expression of the Company's commitment to accepted international and national values, principles and standards for the observance and protection of human rights.

### **3. The principles and obligations of the Company in relation to respect for human rights**

3.1. Respect for human rights and freedoms is the basis of the Company's corporate values.

3.2. Within the framework of its activities, the Company undertakes to adhere to the following principles and obligations.

#### **3.2.1. Equal opportunities and non-discrimination.**

The Company does not permit discrimination against employees, applicants, partners, suppliers and contractors, consumers, shareholders, as well as other stakeholders of the Company on any grounds, including race, gender, age, ethnicity or social origin, skin colour, language, limitations due to health, physical and mental abilities, religion, faith, culture, socio-economic status, experience and education, membership in a particular political, religious or trade union organization, or membership in a particular national minority.

Each employee of the Company has equal opportunities for recognition of his merits (achievements) and career growth (promotion).

#### **3.2.2. Inadmissibility of forced (compulsory) labour and child labour.**

All types of work or services in the Company are performed by employees voluntarily in accordance with the requirements for the position, profession, under the conditions determined by employment contracts concluded in accordance with the requirements of the Labour Code of the Russian Federation and the internal documents of the Company. The Company guarantees the absence of requirements for the performance of work under the threat of punishment or dismissal.

The Company does not accept the use of child labour. The Company does not employ persons under the age of sixteen (16). The Company has implemented reliable mechanisms for checking the age of hired workers and under no circumstances will employ persons under the minimum age established by the Labour Code of the Russian Federation.

The Company expects that partners, suppliers and contractors, customers and other stakeholders will not, under any circumstances, use forced (compulsory) or child labour.

### **3.2.3. Inadmissibility of violence.**

The Company does not tolerate any manifestation of physical, verbal or psychological harassment (violence), including sexual harassment, aggression, abuse or threats in the workplace by colleagues or management.

The Company expects its partners, suppliers and contractors, customers and other stakeholders to behave respectfully and ethically in relation to its employees and the employees of the Company.

### **3.2.4. Ensuring labour protection, industrial and environmental safety.**

The working conditions created in the Company fully comply with the requirements of the legislation of the Russian Federation in the field of ensuring health and safety, as well as the requirements of the internal documents of the Company. The Company regularly evaluates the working conditions at workplaces by conducting a special assessment, implementing production control and analyzing risks associated with industrial safety and labour protection.

The Company takes rational and effective measures to ensure a safe working environment, minimizing the risk of accidents and harm to the health of employees, suppliers and contractors, consumers, as well as the local population in the regions of presence.

The Company provides equipment to ensure occupational safety, including personal protective equipment necessary to prevent accidents, occupational diseases, and conducts briefings and training of employees (including employees of contractors) in safe methods and techniques for performing work. In addition, the Company is aware of the right of the local population, including employees and their families, to a safe environment, and therefore is guided by the principles of sustainable development and strives to reduce the negative impact on the environment, publicly discloses data on the volumes of resources used, and implements energy efficiency programs.

When planning new construction, the Company assesses its impact on the environment, nature and indigenous peoples.

The Company's approaches to environmental protection activities are set out in the Company's Environmental Policy.

### **3.2.5. Ensuring favourable working conditions.**

The Company complies with all requirements of applicable legislation regarding wages, working hours, guarantees and compensation.

The Company guarantees all employees decent and fair wages, in particular, guarantees its amount not lower than the minimum level established by the regulatory acts of the Russian Federation, and its timely payment, as well as equal remuneration for men and women for equal work<sup>1</sup>. The basis for establishing the amount of wages and other benefits and compensations is the level of qualification, personal efficiency, skills and experience of the employee.

The Company strives to continuously develop the skills and abilities of its employees, improve their qualifications, and ensure compliance with the working

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<sup>1</sup> In accordance with ILO Convention No. 100 "On Equal Remuneration for Men and Women Workers for Work of Equal Value"

conditions and recreation by providing days off, fair payment for overtime work, and paid vacations.

The Company complies with its obligations to participate in state social insurance systems and provide all employees with mandatory social protection. In addition, the Company supports and develops a non-state pension program, provides health and life insurance for employees under corporate voluntary health insurance and accident and illness insurance programs, implements healthy lifestyle support programs, and develops internal initiatives aimed at maintaining psychological health and a healthy atmosphere within the Company.

#### **3.2.6. Respect for cultural characteristics.**

The Company supports the socio-economic development of the regions where it operates, implements projects in this area, and also strives for long-term cooperation with local communities.

The Company respects the culture, customs and values of all stakeholders, local communities, maintains a comprehensive and open dialogue with the local population, including indigenous peoples in the regions of presence, respects their right to cultural identity and traditional way of life. The Company strives to attract workers from the local population, as well as organize their training for the purpose of improving their skills. The work of workers from the local population is fairly paid, which ensures compliance with the principle of equal remuneration for equal work.

#### **3.2.7. Respect for the rights to freedom of assembly and association.**

The Company respects the rights of employees to freedom of assembly and association (including the right to collective bargaining), freedom of opinion, and does not interfere with their desire to establish, join or not join trade unions or other associations in support of their interests. Employees are always free in their choice and should not be afraid that its consequences may be negative for them. In the event that the interests of employees are represented by a trade union operating in accordance with the requirements of the legislation of the Russian Federation, the Company strives to establish and maintain a constructive dialogue and good-faith cooperation with it.

The Company respects the civil rights of workers and recognizes their right to participate in political, religious and other social activities as private individuals.

#### **3.2.8. Ensuring the maintenance and development of diversity and inclusion.**

The Company observes and develops the principles of socio-cultural diversity and inclusiveness in relation to its employees, including members of the Executive Bodies of the Company<sup>2</sup>, as well as in relations with partners, suppliers, contractors and other stakeholders, recognizes their importance, shares the confidence that diversity and inclusiveness are significant factors in achieving the long-term development goals of the Company and contribute to the attraction, development, retention of talent, as well as the adoption of the most effective decisions.

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<sup>2</sup> In accordance with the Articles of Association of the Company, the executive bodies of the Company include the sole executive body of the Company – the General Director of the Company and the collegial executive body of the Company – the Management Board of the Company.

The Company pays special attention to ensuring an accessible and inclusive environment, taking into account the specifics of its production activities, including for people with disabilities.

#### **4. Mechanisms for ensuring respect for human rights**

4.1. In order to fulfill the obligations assumed, the Company implements the following mechanisms for observing human rights.

##### **4.1.1. Human rights risk management.**

Identification and assessment of risks associated with human rights violations is an integral part of the corporate risk management and internal control system.

In accordance with the Risk Management and Internal Control Policy of the Company and its subsidiaries, the Company regularly carries out comprehensive work to identify and assess risks associated with the violation of human rights, develops risk management measures and implements control procedures, as well as implements other measures aimed at minimizing risks, and monitors the effectiveness of the measures taken.

##### **4.1.2. Human rights education.**

4.1.2.1. In order to ensure a uniform understanding of key principles and norms in the field of human rights, the Company communicates the provisions of this Policy to internal and external stakeholders by posting the Policy on the Company's website on the Internet at the address: <https://www.mrsk-1.ru> (hereinafter referred to as the Company's website), as well as through training in accordance with subparagraphs 4.1.2.2 – 4.1.2.5 of subparagraph 4.1.2 of paragraph 4.1 of this Policy.

4.1.2.2. The Company provides all employees with equal opportunities for training in the field of human rights, taking into account the functional responsibilities of employees in their areas of activity.

4.1.2.3. Human rights training is aimed at developing knowledge among employees about key rights and responsibilities, including, but not limited to, knowledge about the Company's corporate values, corporate standards of business ethics, rules of conduct in the workplace, the foundations and principles of labour relations, the procedure for filing and considering complaints, etc.

4.1.2.4. The forms and programs of training in the field of human rights are determined by the Company taking into account the need for training, changes in the requirements of legislation, local regulations of the Company, etc.

4.1.2.5. Participation in training events in the field of human rights cannot be compulsory and is voluntary for all employees of the Company.

##### **4.1.3. Feedback and protection mechanism.**

4.1.3.1. The Company is open to proposals and requests from stakeholders.

The Company provides all stakeholders with the opportunity to submit an appeal on issues related to the violation of human rights (including issues related to the content and application of this Policy) through any of the following feedback channels:

- by post to the Company (marked "human rights") at the address: 119017, Moscow, Malaya Ordynka St., 15;

- by sending a message (request/complaint) to the email addresses: [posta@mrsk-1.ru](mailto:posta@mrsk-1.ru);
- by filling out an electronic feedback form posted on the Company's website. The feedback form operates automatically with the ability to send text messages and copies of documents.

The Company guarantees confidentiality and the absence of any negative consequences in relation to all applicants and undertakes, in the event of establishing facts of violations, to take all necessary measures to eliminate them, as well as to provide feedback on incoming requests.

4.1.3.2. The Company ensures the maintenance of documented records of requests and the timely notification of stakeholders about the results of their consideration.

4.1.3.3. The Company undertakes to promptly and comprehensively respond to all cases of violation of the provisions of this Policy, as well as to carry out preventive measures to prevent the occurrence of such situations.

Employees of the structural divisions of the Company, within the powers defined by the internal documents of the Company, ensure an objective, comprehensive and timely consideration of the appeal, evaluate the facts stated in the appeal, analyze the documents, if any, attached. If necessary, request clarifying information and additional materials from the applicant.

The period for consideration of applications is 30 calendar days from the date of their receipt.

4.1.3.4. The Company has a Commission for Compliance with Corporate Ethics Standards and Conflict of Interest Resolution (hereinafter referred to as the Commission), which is authorized to consider issues of violation of corporate ethics standards and corporate conduct standards in the Company, resolution of pre-conflict situations and other issues related to the violation of human rights.

4.1.3.5. The work of the Commission is regulated by the Regulation on the Commission for Compliance with Corporate Ethics Standards and Resolution of Conflicts of Interest of Rosseti Centre, PJSC and Rosseti Centre and Volga region, PJSC, which defines the procedure and deadlines for filing an application (complaint) by an employee, the rules for holding meetings and making decisions of the Commission, and other matters.

4.1.3.6. The Company expects its supply chain participants to implement their own channels for receiving complaints and provide opportunities for all groups of their stakeholders to submit complaints and suggestions through these channels.

#### **4.1.4. Informing and reporting.**

4.1.4.1. In its commitment to the principle of information transparency, the Company strives to ensure that internal and external stakeholders are aware of its activities in the area of human rights.

4.1.4.2. The Company maintains records and discloses information on the results of the Company's activities in the area of human rights, including its approach, principles, compliance with social, labour and ethical standards, as well as measures implemented to prevent, minimize and eliminate negative impacts in this area in the



Reports on social responsibility and corporate sustainable development and other internal documents of the Company.

## **5. Control and responsibility**

5.1 The Company recognizes that one of the essential components of due diligence in the area of human rights is ensuring adequate monitoring of their observance.

5.2. The Company strives to implement monitoring and control procedures in its activities that ensure a comprehensive check of compliance with human rights in all business processes, the identification of areas requiring response, as well as the timely initiation of appropriate measures and changes.

5.3. Monitoring of compliance with human rights is carried out in the Company by the heads of the Company's structural divisions within the framework of their powers, as well as by the Commission for Compliance with Corporate Ethics Standards and Resolution of Conflicts of Interest.

5.4. The Company's employees are responsible for compliance with this Policy.

5.5. The Company expects each employee to treat his colleagues with respect and to oppose any kind of violation of human rights.

5.6. Persons guilty of violating the norms concerning the observance of human rights shall be held liable in accordance with the legislation of the Russian Federation.

5.7. Any stakeholder whose rights have been violated has the right to apply for compensation for damages in the manner established by applicable legislation (including international legal acts recognized by the Russian Federation). The Company does not interfere with the exercise of legal rights to file claims for appropriate compensation and strictly complies with court decisions that have entered into legal force to award such compensation.

## **6. Final Provisions**

6.1. This Policy is posted on the Company's website.

6.2. Changes to this Policy are made as necessary (taking into account changes in the Russian legislation) in order to ensure its compliance with the requirements of the legislation of the Russian Federation in the area of observance and protection of human rights, as well as the effective implementation of the provisions of this Policy.

## **7. Terms, definitions and abbreviations**

7.1 The following key terms and definitions are used in this Policy:

<b>Terms</b>	<b>Definitions</b>
Universal Declaration of Human Rights	A document recommended to all member states of the United Nations, adopted by the UN General Assembly ("International Covenant on Human Rights") on 10.12.1948.

	The text of the Declaration is the first global definition of the rights that all people have and is part of the International Bill of Human Rights.
UN Global Compact	A voluntary international UN initiative designed to encourage businesses to follow the principles of sustainable development, implement responsible business practices, and report on the results of their activities in this area in order to ensure their participation in solving the most important global problems.
Child labour	Work performed by a person who has not yet completed compulsory schooling and has not reached the age of 16 <sup>3</sup> .
ILO Declaration on Fundamental Principles and Rights at Work	An international document adopted by the International Labour Organization in 1998 (Geneva) and enshrining fundamental principles and rights in the world of work
UN Declaration on the Rights of Indigenous Peoples	A resolution adopted by the UN in 2007 that outlines and defines the individual and collective rights of indigenous peoples, including their ownership of cultural and ceremonial expression, identity, language, employment, health, education and other matters.
Discrimination	Any distinction, exclusion or preference based on race, colour, descent, national or ethnic origin which has the purpose or effect of nullifying or impairing the recognition, enjoyment or exercise, on an equal basis, of human rights and fundamental freedoms in the political, economic, social, cultural or any other field of public life <sup>4</sup> .
Stakeholders	State bodies, local government bodies, public-law entities, legal entities and individuals who may be interested in the results of the Company's activities and the creation of value and (or) may have a significant impact on the activities, products and services of the Company, or whose decisions or actions may affect the Company's ability to create value,

<sup>3</sup> International Labour Organization Convention No. 138 "Concerning Minimum Age for Admission to Employment" (Geneva, 26 June 1973).

<sup>4</sup> International Convention on the Elimination of All Forms of Racial Discrimination of 21.12.1965.

	<p>successfully implement its strategies and achieve its goals, as well as individuals and legal entities affected by the Company's activities<sup>5</sup>.</p> <p>For the purposes of this policy, the stakeholders of Rosseti Centre, PJSC shall be understood as:</p> <ul style="list-style-type: none"> <li>– employees (including former employees (veterans/retirees));</li> <li>– members of the Board of Directors of the Company;</li> <li>– shareholders, investors, bondholders, analysts, rating agencies;</li> <li>– consumers;</li> <li>– professional associations and industry organizations;</li> <li>– partners, suppliers and contractors;</li> <li>– federal and regional authorities, local government bodies;</li> <li>– population of the regions of presence, local communities;</li> <li>– scientific community and educational institutions;</li> <li>– environmental, public and social organizations;</li> <li>– media.</li> </ul>
Inclusiveness (for the purposes of this Policy)	<p>A component of corporate culture in which diversity and equal opportunity are expressed in the recognition of the uniqueness and potential of each employee (and/or partner, supplier, contractor), respect for all stakeholders, with the aim of creating conditions that facilitate the disclosure of such potential, an open exchange of ideas and the absence of socio-cultural barriers and prejudices.</p>
UN Convention on the Elimination of All Forms of Discrimination against Women	<p>The Convention is aimed at protecting the rights of women, was adopted on 18.12.1979 and entered into force on 03.09.1981.</p>
Convention on the Rights of the Child	<p>An international human rights treaty that establishes the civil, political, economic, social, health, and cultural rights of children.</p>

<sup>5</sup> Information letter of the Bank of Russia dated 12.07.2021 No. IN-06-28/49 "On recommendations for disclosure by public joint-stock companies of non-financial information related to the activities of such companies".

	Approved by the UN General Assembly on 20.11.1989 and entered into force on 02.09.1990.
Indigenous peoples	Peoples living in the territories of traditional settlement of their ancestors, preserving the traditional way of life, economic activities and industries, numbering less than 50 thousand people in the Russian Federation and considering themselves as independent ethnic groups' communities <sup>6</sup> .
International Bill of Human Rights	The set of international legal norms contained in the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, as well as the International Covenant on Civil and Political Rights and its two protocols.
Local population	A group of persons living and/or working in the regions where Rosseti Centre, PJSC operates.
Diversity	Demographic and other characteristics of the workforce (age, gender, race, colour, nationality, ethnic origin, religion and others), as well as characteristics related to the socio-economic context
Partners	Persons who are not participants in the supply chain of Rosseti Centre, PJSC, but with whom business relations have been established.
Consumers	Individuals or legal entities, including individual entrepreneurs with whom Rosseti Centre, PJSC has concluded contracts for the provision of services for the transmission of electricity, new connection to electric grids and provision of additional (non-tariff) services.
Suppliers and contractors (supply chain participants)	Individuals or legal entities, including individual entrepreneurs (or associations of such individuals), who meet the requirements of the legislation of the Russian Federation and procurement documentation, with whom Rosseti Centre, PJSC has concluded or plans to conclude an agreement.

<sup>6</sup> Federal Law of 30.04.1999 No. 82-FZ "On guarantees of the rights of indigenous peoples of the Russian Federation"

Human rights	The opportunities (rights) of each person, established and guaranteed by the state, regardless of their nationality, place of residence, gender, ethnicity, skin colour, views, religion, language or any other characteristics. All people have equal human rights, excluding any discrimination. These rights are interconnected, interdependent and indivisible.
Forced labour	All types of work (services) that are required from any person under the threat of any punishment (violent influence), with the exception of cases provided for by the legislation of the Russian Federation.
Workers	Individuals who are in employment relationships with the Company <sup>7</sup> .
Guidance on social responsibility	The first comprehensive international standard in the field of social responsibility. Respect for human rights is one of the key principles and topics of this standard. In 2013, the GOST R ISO 26000:2012 standard was approved in Russia, which is identical to the international standard ISO 26000:2010 "Guidance on social responsibility".
United Nations Guiding Principles on Business and Human Rights	The first universally recognized global international standard in the field of human rights and business. The Guiding Principles were approved by the UN Human Rights Council on 16.06.2011 and include 31 principles.
Fundamental Conventions of the International Labour Organization	Fundamental normative documents adopted by the ILO on social and labour issues, including fundamental human rights, minimum wages, industrial relations, employment, social dialogue, social protection and other issues. For the purposes of applying this Policy, the following shall be understood as primary: 1. Convention No. 29 "Concerning Forced or Compulsory Labour" (1930);

<sup>7</sup> Labour Code of the Russian Federation.

	<p>2. Convention No. 100 "On Equal Remuneration for Men and Women Workers for Work of Equal Value" (1951);</p> <p>3. Convention No. 105 "Abolition of Forced Labour" (1957);</p> <p>4. Convention No. 111 "Concerning Discrimination (Employment and Occupation)" (1958);</p> <p>5. Convention No. 182 "Concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour" (1999);</p> <p>6. Convention No. 138 "Concerning Minimum Age for Admission to Employment" (1973);</p> <p>7. Convention No. 87 "The Freedom of Association and Protection of the Right to Organise" (1948);</p> <p>8. Convention No. 98 "Concerning the Application of the Principles of the Right to Organise and to Bargain Collectively" (1949).</p>
Social Charter of Russian Business	A voluntary initiative of Russian business based on the understanding and recognition by representatives of the business community of the active role of business in social development. The charter is based on a system of principles in the field of economic freedom and social responsibility (adopted by the RSPP Congress in 2004, its new version was adopted by the RSPP Congress in 2008, updated version - in 2021).
Ethical behaviour	The behaviour of a person that fully complies with generally accepted principles, rules and norms of behaviour, as a result of which the rights and interests of other persons are not violated or limited

7.2. The following abbreviations are used in the Policy:

ILO	International Labour Organization
UN	United Nations
RSPP	Russian Union of Industrialists and Entrepreneurs