

Appendix # 2
to the decision of the Board of Directors of Rosseti Centre, PJSC
Minutes dated 24.07.2023 # 34/23

**THE ANTI-CORRUPTION POLICY OF ROSSETI CENTRE, PJSC AND
SUBSIDIARIES AND DEPENDENT COMPANIES OF ROSSETI CENTRE, PJSC**

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Data on the document

1	Top-level business process, the owner of which is responsible for the development and updating of the internal regulation	BP 32 «Ensuring comprehensive security»
2	Owner of the top-level business process responsible for the development and updating of the internal regulation	Deputy General Director for Security
3	Head or manager of the business process responsible for the development and updating of the internal regulation	Head of Anti-Corruption Compliance Procedures Section
4	Versions of the internal regulation	№1 – introduced for the first time
5	Justification of a new version of the document	In order to fulfill the requirements of Article 13.3 of Federal Law of the Russian Federation No. 273-FZ dated 25 December 2008 “On Combating Corruption”; paragraph 2.3. of item 2 of Minutes of the meeting of the Board of Directors of Federal Grid Company - Rosseti, Public Joint Stock Company (hereinafter referred to as PJSC Rosseti) dated 07 June 2023 No. 620/2
6	Periodic check	Performed once a year, based on the results of internal audits of business processes or on the basis of decisions of Deputy General Director for Security of Rosseti Centre, PJSC
7	Validity from last approval	5 years
8	Placement and storage	Original – in the Administration Office. Electronic version – in Docflow System, Internal Documents Library, corporate portal at http://mrportal/sites/SMK/
9	Participants in the procedure/process	para.5.1 of the Anti-corruption Policy of Rosseti Centre, PJSC and SDCs of Rosseti Centre, PJSC
10	Acquaintance method	Task in Docflow System
11	Additional data	-

1. General provisions

1.1. The Anti-Corruption Policy of Public Joint stock company «Rosseti Centre» and subsidiaries of Public Joint stock company «Rosseti Centre» (hereinafter referred to as the Anti-Corruption Policy) is a single fundamental document that defines the goals, objectives, principles and measures in the field of preventing and combating corruption in Rosseti Centre, PJSC (hereinafter referred to as the Company) and subsidiaries of Rosseti Centre, PJSC (hereinafter referred to as the subsidiaries).

1.2. In accordance with the requirements of Article 13.3. of Federal Law No. 273-FZ dated 25 December 2008 “On Combating Corruption” (hereinafter referred to as the Law on Combating Corruption), the Anti-Corruption Policy defines in Rosseti Centre, PJSC measures to prevent corruption: identification of departments or officials responsible for the prevention of corruption and other offenses; the procedure for cooperation with law enforcement agencies; development and implementation of standards and procedures aimed at ensuring fair work; adoption of a code of ethics and official behaviour of employees; prevention and settlement of conflicts of interest; prevention of unofficial reporting and the use of forged documents.

1.3. The Company and the Company’s subsidiaries are actively implementing standards and procedures aimed at ensuring conscientious work.

1.4. The Company and the Company’s subsidiaries follow anti-corruption standards aimed at open, responsible and honest implementation of activities provided for by the charters of the Company and the Company’s subsidiaries, minimization of corruption offenses in the power grid complex that affect consumer confidence, business reputation of the Company and the Company’s subsidiaries.

1.5. The list of regulatory legal acts of the Russian Federation, on the basis of which the Anti-Corruption Policy of the Company and the Company’s subsidiaries is in Appendix 1, which is an integral part of this Anti-Corruption Policy.

1.6. The Company and the Company’s subsidiaries ensure the publicity of their anti-corruption measures, post on the official website of the Company and the official websites of the Company’s subsidiaries documents and information on anti-corruption issues, including anti-corruption policies and codes of ethics and official conduct of employees of the Company and the Company’s subsidiaries.

2. Terms and definitions

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

2.2. In the event of a conflict between a regulatory legal act of the Russian Federation in the field of combating corruption, as a result of changes made to it, and the definition of a term or other provision given in this Anti-Corruption Policy, the applicable definition, the provisions of the relevant regulatory legal act of the Russian Federation shall be considered the norm.

3. Principles, goals and objectives of the Anti-Corruption Policy

3.1. Principles of the Anti-Corruption Policy:

- compliance of the Anti-Corruption Policy with the current legislation in the field of combating corruption and generally accepted norms;
- observance of the legitimate rights and interests of stakeholders, employees of the Company and the Company's subsidiaries, protection of the business reputation of the Company and the Company's subsidiaries, partners, and other interested parties, the confidentiality regime in the implementation of anti-corruption measures;
- a personal example of leadership in the formation of a culture of intolerance towards corruption and the creation of an internal system for preventing (prevention) and combating corruption;
- building a risk management and internal control process to prevent and combat corruption within the framework of a unified risk management and internal control system of the Company and the Company's subsidiaries;
- involvement of employees: awareness of employees of the Company and the Company's subsidiaries about the provisions of anti-corruption legislation and their active participation in the formation and implementation of anti-corruption standards and procedures in the Company and the Company's subsidiaries;
- proportionality of anti-corruption procedures to the amount of possible damage in the event of a corruption risk;
- effectiveness of anti-corruption procedures: carrying out anti-corruption measures that ensure ease of implementation and bring significant results;
- responsibility and inevitability of punishment for employees of the Company and the Company's subsidiaries, regardless of their position, length of service and other conditions, in case they commit corruption offenses;
- openness in the implementation of activities provided for by the charters of the Company and the Company's subsidiaries: informing partners, counterparties, and the public about anti-corruption measures taken in the Company and the Company's subsidiaries;
- continuous control and regular monitoring of the effectiveness of the implemented anti-corruption procedures.

3.2. Goals of the Anti-Corruption Policy

The purpose of the Anti-Corruption Policy of the Company and the Company's subsidiaries is a unified approach to fulfilling the requirements of Article 13.3. of the Law on Combating Corruption and other regulatory legal acts of the Russian Federation in the field of combating corruption, development and adoption of measures to prevent and combat corruption: identifying and subsequently eliminating the causes of corruption (prevention of corruption); detection, prevention and suppression of corruption and other offenses; minimization and (or) elimination of the consequences of corruption and other offenses, reducing the risks of bringing the Company and the Company's subsidiaries to liability, for example, under Article 19.28 of the Code of Administrative Offenses of the Russian

Federation (hereinafter referred to as the Code of Administrative Offenses), employees of the Company and the Company's subsidiaries - under Article 290 of the Criminal Code of the Russian Federation (hereinafter - the Criminal Code of the Russian Federation) "Taking a bribe", 291 of the Criminal Code of the Russian Federation "Giving a bribe", 291.1 of the Criminal Code of the Russian Federation "Mediation in bribery", as well as other liability provided for by the legislation of the Russian Federation for corruption offenses.

The Anti-Corruption Policy of the Company and the Company's subsidiaries is aimed at implementing the requirements of the Company's Corporate Governance Code, including in terms of determining measures to form elements of the corporate culture, organizational structure, rules and procedures that ensure the prevention of corruption, assessing the reliability of procedures for countering illegal actions, abuses and corruption, as well as checking compliance by employees of the Company and the Company's subsidiaries with the provisions of the legislation of the Russian Federation and local regulations of the Company and the Company's subsidiaries regarding confidential information, combating corruption, compliance with the requirements of the Code of Corporate Ethics and Official Conduct of the Company's Employees and Codes of Corporate Ethics and Official Conduct of Employees of the Company's subsidiaries.

3.3. Objectives of the Anti-Corruption Policy:

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

3.3.2. development and implementation of measures to implement the National Anti-Corruption Plan approved by the relevant Decree of the President of the Russian Federation, Minutes of the Commission under the President of the Russian Federation on the Strategy for the Development of the Fuel and Energy Complex and Environmental Safety of 10 July 2013 No. A-60-26-8; instructions of the Government of the Russian Federation dated 28 December 2011 No. VP-P13-9308 and dated 5 March 2012 No. VP-P24-1269 and other instructions of the Government of the Russian Federation and the shareholder represented by the Russian Federation, as well as methodological recommendations of the Ministry of Labour of Russia in the field combating corruption;

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

3.3.4. identification, assessment and description of corruption risks, development of procedures to minimize them, monitoring the effectiveness of measures;

3.3.5. formation of responsibility for the employees of the Company and the Company's subsidiaries for their actions and behaviour;

3.3.6. formation among the members of the management and control bodies of the Company and the management and control bodies of the Company's subsidiaries, employees of the Company and the Company's subsidiaries, partners and counterparties of a clear

understanding of the position of the Company and the Company's subsidiaries regarding the rejection of corruption in any form and manifestation;

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

4. Main measures to prevent corruption in the Company and the Company's subsidiaries:

4.1. determination of the functions and tasks of the structural divisions of the Company and structural divisions of the Company's subsidiaries responsible for the prevention of corruption offenses, combating corruption, compliance control;

4.2. development and implementation of a set of standards and procedures aimed at ensuring conscientious work;

4.3. familiarization of employees of the Company and the Company's subsidiaries with the codes of ethics and official conduct of employees of the Company and the Company's subsidiaries;

4.4. identification and assessment of corruption risks in accordance with the Company's local regulations and local regulations of the Company's subsidiaries;

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

4.6. identifying and resolving conflicts of interest;

4.7. development of control procedures to minimize the risk of bringing the Company or the Company's subsidiaries to liability under Article 19.28 of the Code of Administrative Offenses;

4.8. cooperation with law enforcement agencies in the field of combating corruption, reporting on detected violations, assisting in inspections;

4.9. establishment of control procedures to prevent cases of informal reporting and the use of forged documents.

5. Persons subject to the Anti-Corruption Policy and their general responsibilities

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

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

- refrain from behaviour that can be interpreted by others as a willingness to give or receive a bribe, offer or promise mediation in the transfer or receipt of a bribe, including on behalf of or in the interests of the Company and/or the Company's subsidiaries;

- refrain from receiving business gifts from partners and counterparties of the Company and/or the Company's subsidiaries, including the transfer of business gifts to other employees of the Company and the Company's subsidiaries, except for the receipt by an employee of business gifts in connection with protocol events, business trips, other official events and other cases established by federal laws and other regulatory legal acts that determine the specifics of the legal status and the specifics of the employee's labour activity.

- inform the structural subdivision of the Company and/or the structural subdivision of the Company's subsidiaries responsible for the prevention of corruption offenses, combating corruption, compliance control about cases of inclination to commit corruption offenses;

- inform the structural subdivision of the Company and/or the structural subdivision of the Company's subsidiaries responsible for the prevention of corruption offenses, combating corruption, compliance control about a conflict of interest or the risk of a conflict of interest, about the fact of a corruption offense committed by other employees of the Company and/or the Company's subsidiaries, partners, counterparties and employees of the counterparty of the Company and/or the Company's subsidiaries or other persons.

5.3. Partners and counterparties of the Company and the Company's subsidiaries are informed that they:

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

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

- refrain from committing or participating in the commission of corruption offenses, demonstrate behaviour that can be interpreted as a willingness to give or receive a bribe, to be an intermediary in the transfer or receipt of a bribe.

5.4. The Company and the Company's subsidiaries recommend that partners and counterparties of the Company and the Company's subsidiaries inform the Company or the Company's subsidiaries in case of inclination to give or receive a bribe, as well as mediation in the transfer or receipt of a bribe.

5.5 The Company and the Company's subsidiaries recommends that partners and counterparties refrain from giving business gifts to the management bodies of the Company and the management bodies of the Company's subsidiaries, employees of the Company and the Company's subsidiaries.

6. The mechanism for the implementation of the Anti-Corruption Policy

6.1. Definition of functions and tasks of departments and officials responsible for the prevention of corruption offenses and the prevention of corruption

6.1.1. The Board of Directors of the Company and the boards of directors of the Company's subsidiaries, the executive bodies of the Company, in accordance with the Charter of Rosseti Centre, PJSC, and the sole executive bodies of the Company's subsidiaries, in accordance with the relevant charters of the Company's subsidiaries, the Company's Deputy General Director for Security, the Company's subdivision and structural subdivisions of the Company's subsidiaries responsible for the prevention of corruption offenses, combating corruption, compliance control ensure that employees of the Company and the Company's subsidiaries comply with the fundamental principles, tasks and requirements of this Anti-Corruption Policy in the Company and the Company's subsidiaries and monitor the effectiveness of measures of the Anti-Corruption Policy.

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

- determine the key strategic directions of the Anti-Corruption Policy. The Board of Directors approves the Anti-Corruption Policy of the Company, the Company's subsidiaries join the Anti-Corruption Policy of the Company through the decision of the Boards of Directors of the Company's subsidiaries;

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

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

- are responsible for organizing all activities aimed at implementing the principles and requirements of the Anti-Corruption Policy, including the appointment of officials of the Company and the Company's subsidiaries responsible for the implementation of the anti-corruption policy in Rosseti Centre's group of companies, prevention of corruption offenses, combating corruption, compliance control;

- empower the subdivision of the Company and structural subdivisions of the Company's subsidiaries responsible for the prevention of corruption offenses, combating corruption, compliance control with powers sufficient to carry out anti-corruption measures in the Company and the Company's subsidiaries, including in relation to persons holding senior positions in the Company and the Company's subsidiaries provide the necessary human and technical resources;

- approve the register of corruption risks, the list of owners of corruption risks, consider the report on minimization of corruption risks;

- ensure annual consideration by the Company's Board of Directors and the Boards of Directors of the Company's subsidiaries of reports on compliance with this Anti-Corruption Policy and reports on compliance with the anti-corruption policies of the Company's subsidiaries (report on the results of Anti-Corruption Monitoring).

6.1.4. The structural subdivision of the Company responsible for the prevention of corruption offenses, combating corruption, in accordance with the Strategy of the Electric Grid Complex of the Russian Federation, is the centre for coordinating and controlling the activities of the Company's subsidiaries in the field of preventing and combating corruption.

6.1.5. The structural subdivision of the Company responsible for the prevention of corruption offenses, combating corruption, compliance control organizes annual seminars-meetings on improving anti-corruption activities in Rosseti Centre's group of companies with the heads of structural subdivisions of the Company's subsidiaries responsible for the prevention of corruption offenses, combating corruption, compliance control.

6.1.6. Structural divisions of the Company and subsidiaries Companies responsible for the prevention of corruption offenses, combating corruption, compliance control:

- form and implement in the Company and the Company's subsidiaries a unified methodology in the field of implementation of anti-corruption policy aimed at preventing, detecting and suppressing corruption offenses, as well as minimizing corruption and reputational risks;

- carry out activities aimed at implementing the principles and requirements of the Anti-Corruption Policy;

- develop, revise the plan of anti-corruption measures;

- exercise compliance control over the activities of the Company and the Company's subsidiaries in the field of combating corruption;

- carry out control measures aimed at identifying corruption and other offenses;

- exercise anti-corruption control over the procurement activities of the Company and the Company's subsidiaries;

- organize the reception and consideration of applications received via the hotline from applicants (employees, counterparties of the Company and the Company's subsidiaries, other individuals and legal entities) about possible facts of corruption and fraud;

- organize activities in the Company and the Company's subsidiaries to manage conflicts of interest, internal ethical requirements, including:

- organize the filling and consideration of declarations of a conflict of interest;

- organize verification of information about the property, income and obligations of a property nature of persons determined by the Company's local regulations and local regulations of the Company's subsidiaries to provide such information, their spouse and minor children, for reliability, identifying signs of affiliation, conflicts of interest, pre-conflict situations and other abuses related to positions held in the Company;

- organize inspections of employees admitted to the Company and the Company's subsidiaries for the reliability of the documents submitted when hiring and the presence of information of a compromising nature in relation to them;

- organize training events on prevention and combating corruption, as well as individual counselling for employees;

- organize an increase in the effectiveness of outreach and educational measures aimed at creating an atmosphere of intolerance towards corruption offenses in society;

- provide assistance to authorized representatives of the regulatory and law enforcement agencies of the Russian Federation when they conduct inspections of the activities of the Company and/or the Company's subsidiaries on issues of preventing and combating corruption;

- provide assistance to authorized representatives of law enforcement agencies of the Russian Federation in carrying out measures to suppress or investigate corruption crimes, including operational-search measures;

- prepare reports on the implementation of anti-corruption policies and anti-corruption action plans (Anti-corruption monitoring);

- develop and implement anti-corruption standards;

- provide methodological assistance in the implementation of measures to combat and prevent corruption and legal education of employees;

- carry out the exchange of experience between the structural divisions of the Company and the Company's subsidiaries in order to increase the effectiveness of measures to combat and prevent corruption and legal education of employees;

- coordinate the activities of structural units in the implementation of the Anti-Corruption Policy;

- take part in holding summits, scientific and practical seminars, conferences of the Russian and international level in the field of combating and preventing corruption;

- interact with public authorities and local governments, scientific and educational organizations and institutions in the field of combating and preventing corruption;

- organize and monitor Russian, applicable foreign and international anti-corruption legislation and track changes made to them, as well as relevant judicial practice;

- conduct scheduled and unscheduled inspections of compliance with the principles of this Anti-Corruption Policy, draw up reports on the results of inspections;

- carry out the development of documents in the field of combating and preventing corruption and initiate the updating of documents in connection with changes in the legislation of the Russian Federation in the field of combating corruption.

6.1.7. The Central Commission for Compliance with Corporate Ethics and Settlement of Conflicts of Interest is a collective body of the Company, which:

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

- considers issues related to compliance with the norms of corporate ethics and settlement of the conflict of interests of employees of the Company's subsidiaries.

6.1.8. Commissions for Compliance with Corporate Ethics and Resolution of Conflicts of Interest – collegial bodies of the Company's subsidiaries, which:

- carry out consideration of issues related to the settlement of pre-conflict interests in the Company's subsidiaries, compliance with the provisions of this Anti-Corruption Policy, codes of corporate ethics and official conduct of employees of the Company's subsidiaries.

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

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

6.2.2. Lists of positions with high corruption risk, owners of corruption risks of the Company and owners of corruption risks of the Company's subsidiaries, a list (register) of corruption risks, certificates and maps of corruption risks, control matrices for managing corruption risks and control procedures for business processes of the Company and the Company's subsidiaries.

6.3. Prevention and resolution of conflicts of interest

In order to manage the risk of a conflict of interest, the impact of the personal interest of employees of the Company and the Company's subsidiaries on their official duties, business decisions, the Company and the Company's subsidiaries take measures to identify, prevent and resolve conflicts of interest:

6.3.1. Develop and adopt local regulations that establish the procedure for identifying and resolving situations of a pre/conflict of interest that may arise for employees of the Company and the Company's subsidiaries in the process of performing their functions and official duties.

6.3.2. Notify all employees of the Company and the Company's subsidiaries about local regulations adopted by the Company and the Company's subsidiaries in the field of a conflict of interest settlement.

6.3.3. They are guided by the following principles when identifying and resolving conflicts of interest:

- mandatory disclosure of information about a real or potential conflict of interest;
- individual consideration and assessment of factors of corruption and reputational risks in identifying each fact of a conflict of interest and its settlement;
- confidentiality of the process of disclosing information about a conflict of interest and the process of its settlement;
- observance of the balance of interests of the Company and the Company's subsidiaries, as well as their employees in the settlement of conflicts of interest;
- protection of the rights of an employee of the Company and the Company's subsidiaries in connection with the notification of a conflict of interest, which was timely disclosed by an employee of the Company or the Company's subsidiaries and settled (prevented) by the Company or the Company's subsidiaries.

6.3.4. Establish responsibilities for employees of the Company and the Company's subsidiaries:

- be guided by the interests of the Company and the Company's subsidiaries when making decisions on business issues and performing their official duties;
- avoid situations and circumstances that may lead to a conflict of interest;

- disclose the emerged (real) or potential conflict of interest, including reporting the occurrence of a conflict of interest, filling out declarations of a conflict of interest;
- assist in the settlement of conflicts of interest that have arisen.

6.3.5. Establish various types of disclosure of conflicts of interest: when hiring, when appointing to a new position, as situations of a conflict of interest arise, during annual declarations of a conflict of interest.

6.3.6. Ensure mandatory completion of declarations of a conflict of interest.

6.3.7. Determine persons responsible for receiving information about a conflict of interest.

6.3.8. Establish a ban on the conclusion of contracts/agreements with persons in respect of which a conflict of interest, affiliation and other abuses of the right or authority have been established.

6.3.9. Establish ways to resolve conflicts of interest.

6.3.10. Define typical situations of a pre/conflict of interest.

6.3.11. Ensure the functioning of commissions for compliance with corporate ethics and settlement of conflicts of interest.

6.4. Development and implementation in activities of the Company and the Company's subsidiaries of standards and procedures aimed at ensuring conscientious work

The Company and the Company's subsidiaries are interested in conscientious work and ethical behaviour of employees of the Company and the Company's subsidiaries, and for this purpose:

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

- common values and principles of work of the Company and the Company's subsidiaries;
- specific rules and standards of conduct for employees of the Company and the Company's subsidiaries, aimed at the formation of ethical, conscientious behaviour of employees of the Company and the Company's subsidiaries.

6.4.2. They verify information about income, property and liabilities of a property nature, in relation to citizens applying for positions subject to declaration, and employees filling these positions in the Company and the Company's subsidiaries, and their close relatives, in accordance with the internal organizational and administrative documents of the Company and the Company's subsidiaries, in order to identify conflict of interest, facts of affiliation and other abuses.

6.4.3. They check the information of citizens hired or with whom civil law contracts are concluded to minimize the risks of being held liable under Article 19.29. of the Code of Administrative Offenses.

6.4.4. They are guided by the principles of honesty and objectivity in the formation of personnel (including management) staff:

- employees of the Company and the Company's subsidiaries are appointed or transferred to higher positions only on the basis of business qualities, competence, experience;

- a ban is established on the employment of persons of close kinship or property, if the exercise of their official duties is associated with the direct subordination or control of one of them to another;

- the presence of employees who are related or connected, in a relationship of direct subordination or control, is allowed in exceptional cases by decision of the Central Commission for Compliance with Corporate Ethics and Settlement of Conflicts of Interest;

- labour dynasties are welcomed in the Company and the Company's subsidiaries. Situations related to the presence of employees of production personnel in direct subordination to close relatives, whose labour activity can be attributed to labour dynasties, are recognized as resolved by the decision of the Central Commission for Compliance with Corporate Ethics and Settlement of Conflicts of Interest of the Company/Commission for Compliance with Corporate Ethics and Settlement of the Conflict of Interest of the Company's subsidiaries subject to the conditions of inclusion in the labour dynasty;

- the obligation of certain employees of the Company and the Company's subsidiaries to provide the information specified in paragraph 6.4.2 of the Anti-Corruption Policy is established.

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

6.4.6. Establish the obligation to notify employees of the Company and the Company's subsidiaries about all cases of receipt of a business gift by them.

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

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

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

6.4.10. Provide anti-corruption expertise of local regulations of the Company and the Company's subsidiaries, as well as within the competence of draft legal regulations of the Russian Federation.

6.4.11. They control accounting indicators, the availability and reliability of primary documents, including accounting and writing off accounts receivable, the validity of expenses, periods for adjusting indicators, the availability and reliability of primary documents, etc.

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

6.5. Formation of the foundations of law-abiding behaviour of employees and legal education

6.5.1. The Company and the Company's subsidiaries carry out information and educational activities for employees of the Company and subsidiaries in order to prevent corruption:

- provide access to this Anti-Corruption Policy and other local regulations of the Company and the Company's subsidiaries related to anti-corruption issues;
- create and improve sections "Anti-Corruption Policy" on the official websites of the Company and the Company's subsidiaries;
- place information about the ongoing activities of this Anti-Corruption Policy in the corporate media, in the media;
- provide, in cooperation with the mass media, the dissemination of positive experience of counteraction by the employees of the Company and the Company's subsidiaries to attempts of corruption pressure;
- organize anti-corruption events and social actions;
- provide advanced training for employees of the Company and the Company's subsidiaries, whose duties include the prevention of corruption offenses and combating corruption, compliance control under the educational program of two levels (basic - for first-time students and advanced - for those who have completed training earlier);
- encourage employees of the Company and the Company's subsidiaries for providing confirmed information about corruption and other offenses in the Company and the Company's subsidiaries;
- guarantee that no employee of the Company and the Company's subsidiaries will suffer either in their career or in financial terms, if they refuse to act corruptly, even if such refusal will lead to losses for the Company and the Company's subsidiaries;
- oblige employees of the Company and the Company's subsidiaries to sign an agreement on compliance with the principles and requirements of the Anti-Corruption Policy of the Company and the Company's subsidiaries, as well as the norms of the anti-corruption legislation of the Russian Federation;
- declare the need to develop mechanisms for corporate action for misconduct that may lead to corruption and other offenses.

6.5.2. They take into account the observance by the employees of the Company and the Company's subsidiaries of the principles and requirements of the Anti-Corruption Policy when forming a personnel reserve for promotion to higher positions in the Company and the Company's subsidiaries.

6.6. Consulting and training of employees of the organization

6.6.1. The Company and the Company's subsidiaries organize training for employees on prevention of corruption:

- conduct educational and outreach activities (briefing, training, seminars, questionnaires and testing of employees of the Company and the Company's subsidiaries) aimed at informing employees of the Company and the Company's subsidiaries about the requirements of the legislation of the Russian Federation, applicable foreign legislation in the field of combating corruption, the formation of anti-corruption awareness of employees of the Company and the Company's subsidiaries, and also explain:

- the concept of corruption in the public and private sectors;
- procedures of this Anti-Corruption Policy;
- circumstances, situations (factors, corruption risk scenarios) under which a bribe can be offered or received;

- key signs of corruption;
- which officials of the Company and the Company's subsidiaries should be contacted and by what means to report any suspicions of corruption;

- measures of responsibility for committing corruption offenses;
- requirements of the legislation of the Russian Federation and local regulations of the Company and the Company's subsidiaries in the field of preventing and combating corruption and the procedure for their application;

- the procedure for identifying and resolving conflicts of interest;
- acceptable behaviour in situations of corruption risk, in particular, in cases of extortion of a bribe from officials of state bodies, local governments, state and municipal institutions, state and municipal unitary enterprises, state corporations, public companies and other organizations;

- the procedure for interaction with law enforcement agencies.
- provide individual consultations to employees of the Company and the Company's subsidiaries on issues of preventing and combating corruption in compliance with the principles of confidentiality;

- provide, in cooperation with educational and scientific organizations, regular public lectures on anti-corruption topics in the structural divisions of the Company and the Company's subsidiaries;

- carry out, with involvement of scientific and educational organizations, advanced training of employees of structural divisions of the Company and the Company's subsidiaries responsible for the prevention of corruption offenses and combating corruption, compliance control under programs of additional professional education.

6.7. Consideration and verification of information about possible facts of corruption

6.7.1. The Company and the Company's subsidiaries receive applications from employees of the Company and the Company's subsidiaries, partners, contractors and other

(individual and legal) persons about the risks and facts of corruption through an interactive channel of interaction with applicants, the Hotline telephone, as well as through letters, e-mail.

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

6.7.3. The Company and the Company's subsidiaries strive to create a set of effective measures to verify information about possible facts of corruption, and if they are confirmed, to eliminate (minimize) their consequences and causes that contribute to them.

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

6.8.1. The Company and the Company's subsidiaries are focused on establishing and maintaining business relations with partners and counterparties that:

- support the Anti-Corruption Policy;
- conduct business relations in a conscientious and honest manner;
- take care of their own reputation;
- demonstrate high ethical business standards;
- carry out their own anti-corruption measures;
- participate in collective anti-corruption initiatives.

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

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

- on joining the Anti-Corruption Charter of Russian Business;
- on mandatory compliance with the requirements of the Anti-Corruption Procurement Standard of the Company's Unified Procurement Standard (the Procurement Regulations).

The Anti-Corruption Procurement Standard as part of the Company's Unified Procurement Standard (the Procurement Regulations) is posted on the Company's official corporate website.

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

As part of the verification of procurement participants, procurement winners, counterparties of the Company and the Company's subsidiaries, as well as other third parties engaged by counterparties of co-executors/subcontractors, the following work is carried out:

to disclose the structure of owners of counterparties, including beneficiaries, executive bodies; verification of their reputation and period of activity in the market of goods, works and services, participation in corruption scandals, fraud schemes, etc.; to exclude affiliation, the risk of a conflict of interest and other abuses of the right or authority.

If the procurement participant, procurement winner, counterparty does not have anti-corruption measures in the organization, the Company and the Company's subsidiaries may recommend counterparties to implement such measures or take these circumstances into account when evaluating bids or subsequent interaction.

6.8.5. The Company and the Company's subsidiaries establish rules for partners and counterparties that oblige them, as well as their subcontractors/co-executors, in the process of fulfilling their obligations, including when they act on behalf of or in the interests of the Company and the Company's subsidiaries, not to perform actions qualified as giving (Article 291 of the Criminal Code of the Russian Federation)/receiving (Article 290 of the Criminal Code of the Russian Federation) a bribe, mediation in bribery (Article 291.1 of the Criminal Code of the Russian Federation), commercial bribery (Article 204 of the Criminal Code of the Russian Federation), abuse of power (Article 201 of the Criminal Code of the Russian Federation), illegal remuneration on behalf of a legal entity (Article 19.28 of the Code of Administrative Offenses), other illegal acts (action or inaction) that have signs of corruption.

6.8.6. The Company and the Company's subsidiaries in the process of execution of the contract by the counterparty control the provision of information about the chain of owners of the counterparty of the Company or the subsidiaries of the Company to the final beneficiary – an individual in case of changes in the structure of the owners of the counterparty, about third parties involved by the counterparty to fulfill its obligations under the agreement, as well as deadlines for the fulfillment of contractual obligations and the financial condition of the counterparty, compliance with the Anti-Corruption Clause.

In case of non-compliance by the counterparty of the Company or the Company's subsidiaries with the requirements specified in clause 6.8.6. of this Anti-Corruption Policy, provides for the termination of contractual relations in the manner established by the Company and the Company's subsidiaries.

6.8.7. The Company and the Company's subsidiaries may conduct anti-corruption training for partners and counterparties, especially those who act on behalf of or in the interests of the Company and the Company's subsidiaries.

6.8.8. Counterparties and the Company and the Company's subsidiaries refuse to stimulate each other's employees in any way, including by providing money, business gifts, performing work (services) for them free of charge and in other ways not mentioned here, which puts the employee in a certain dependence and aimed at ensuring that this employee performs any actions in favor of the party stimulating him (the counterparty or the Company and the Company's subsidiaries).

The actions of an employee carried out in favor of the stimulating party (counterparty or the Company and the Company's subsidiaries) are understood as:

- provision of unjustified advantages in comparison with other counterparties;

- provision of any guarantees, preferences;
- acceleration of existing procedures;
- other actions performed by an employee within the framework of his official duties, but which are contrary to the principles of transparency and openness of relations between the counterparty and the Company and the Company's subsidiaries.

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

6.9.1. In order to minimize corruption, reputational risks and the risk of sanctions for bribing foreign officials in international commercial transactions, taking a bribe in the course of carrying out the main activities provided for by the Charter of the Company and the charters of the Company's subsidiaries, the Company and the Company's subsidiaries take the following measures, taking into account the provisions of the regulatory legal acts of the Russian Federation, paragraph 9 of the Anti-Corruption Charter of Russian Business, international standards, this Anti-Corruption Policy:

- analyze business processes of the Company and the Company's subsidiaries in order to identify factors of such corruption risks, develop and implement control procedures to minimize them;
- inform the employees of the Company and the Company's subsidiaries on liability measures for bribery and/or taking bribes from foreign officials, officials of public international organizations;
- keep records of foreign public officials and officials of public international organizations with whom the Company and the Company's subsidiaries interact within the framework of contractual and pre-contractual relations, as well as records of the employees of the Company and the Company's subsidiaries involved in such transactions;
- if facts of bribery of foreign officials are revealed, they inform the Investigative Committee of the Russian Federation;
- in international commercial transactions, if necessary, seek advice and support from the diplomatic and trade missions of the Russian Federation abroad;
- inform interested parties, as part of the Anti-Corruption Monitoring, about the measures taken by the Company and the Company's subsidiaries aimed at preventing bribery of foreign public officials and officials of public international organizations,
- interact with representatives of public authorities and law enforcement agencies, international and other organizations in order to develop and improve measures to counter bribery of foreign public officials and officials of public international organizations;
- monitor the effectiveness of control procedures and measures taken.

6.10. The procedure for interaction with state bodies exercising control and supervision functions

6.10.1. When interacting with the executive authorities of the Russian Federation exercising control and supervisory functions, employees of the Company and the

Company's subsidiaries are prohibited from transferring, offering or promising on behalf and in the interests of the Company and the Company's subsidiaries business gifts, including, the value of which is less than three thousand rubles, money, securities, other property, provide services of a property nature, grant property rights.

6.10.2. The Company and the Company's subsidiaries establish a procedure for reporting to law enforcement agencies about violations of the requirements for official conduct of state and civil servants in the course of control and supervision activities in the Company and the Company's subsidiaries, including ensuring a pre-trial procedure for appealing against their actions.

6.10.3. The Company and the Company's subsidiaries cooperate with law enforcement agencies when they carry out inspection checks of the Company's and the Company's subsidiaries on issues of preventing and combating corruption.

6.10.4. They ensure compliance with the requirements of the legislation of the Russian Federation, instructions of the Chairman of the Government of the Russian Federation¹ and decisions of the Commission under the President of the Russian Federation on the issues of the strategy for the development of the fuel and energy complex² in the framework of ensuring the transparency of the financial and economic activities of the Company and subsidiaries.

6.11. Cooperation with law enforcement agencies in combating corruption

6.11.1. In accordance with paragraph 2 of Article 13.3. of the Law on Combating Corruption, the Company and the Company's subsidiaries carry out the following actions in order to cooperate with law enforcement agencies:

- inform the relevant law enforcement agencies about the revealed facts of corruption and other offenses;
- provide support in identifying and investigating facts of corruption, suppressing or investigating corruption crimes, including operational-search activities, take the necessary measures to preserve and transfer documents and information containing data on corruption offenses;
- do not allow unlawful interference of employees of the Company and the Company's subsidiaries in the activities of law enforcement agencies;
- refrain from any sanctions against employees of the Company and the Company's subsidiaries who reported to law enforcement agencies about information that became known to them in the course of performing labour (official) duties about the preparation or commission of a corruption and other offense.

6.12. Participation in collective initiatives to prevent corruption

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

² Minutes of the Commission under the President of the Russian Federation on the Strategy for the Development of the Fuel and Energy Complex and Environmental Safety dated 10 July 2013 No. A-60-26-8.

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

- in carrying out activities to implement the provisions of the Anti-Corruption Charter of Russian Business in accordance with the Regulations on the Conditions and Procedure for Implementing the Provisions of the Anti-Corruption Charter of Russian Business;

- use of standard anti-corruption clauses in joint agreements;
- public refusal to interact with organizations involved in corruption crimes;
- organizing and conducting joint training on prevention and combating corruption;
- participation of employees of the Company and the Company's subsidiaries in international and other anti-corruption events.

6.12.2. A consolidated list of anti-corruption measures carried out in the Company and the Company's subsidiaries is presented in Appendix 3, which is an integral part of this Anti-Corruption Policy.

7. Subsidiaries

The Company and the Company's subsidiaries, in accordance with the corporate governance system in force in the Company and the Company's subsidiaries, initiate the implementation in the Company's subsidiaries of their own anti-corruption policies similar to this Anti-Corruption Policy, and also make reasonable efforts to ensure that the fundamental principles and requirements of the Anti-Corruption Policy are observed in joint ventures, companies and associations, shares and stakes of which are owned by the Company and the Company's subsidiaries.

8. Responsibility

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

8.2. The Company and the Company's subsidiaries take measures to ensure that persons guilty of corruption offenses are held liable in accordance with the legislation of the Russian Federation in the field of combating corruption.

8.3. Persons guilty of violating the provisions of the Anti-Corruption Policy are subject to corporate enforcement measures.

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

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

9.1. The Company and the Company's subsidiaries carry out regular monitoring of the effectiveness of the measures of this Anti-Corruption Policy through internal and/or external audits.

9.2. The Company and the Company's subsidiaries shall ensure the conditions under which employees of the Company and the Company's subsidiaries, as well as other interested parties, can freely point out shortcomings of this Anti-Corruption Policy, as well as make proposals for its improvement.

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

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

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

**The list of regulatory legal acts of the Russian Federation, on the basis of which
the Anti-Corruption Policy of the Company and the Company's subsidiaries was
developed**

- the Civil Code of the Russian Federation;
- the Labour Code of the Russian Federation;
- the Code on Administrative Offenses of the Russian Federation;
- the Criminal Code of the Russian Federation;
- Federal Law from 26 December 1995 № 208-FZ «On Joint Stock Companies»;
- Federal Law from 7 August 2001 № 115-FZ «On combating legalization (laundering) of proceeds from crime and financing of terrorism»;
- Federal Law from 25 December 2008 № 273-FZ «About corruption counteraction»;
- Federal Law from 27 July 2010 № 224-FZ «About counteraction to misuse of insider information and manipulation of the market and about modification of separate acts of the Russian Federation»;
- Federal Law from 3 December 2012 № 230-FZ «On control over the compliance of expenses of persons holding public positions and other persons with their income»;
- Federal Law from 7 May 2013 № 79-FZ «On the prohibition of certain categories of persons to open and have accounts (deposits), keep cash and valuables in foreign banks located outside the territory of the Russian Federation, own and (or) use foreign financial instruments»;
- Decree of the President of the Russian Federation from 2 April 2013 № 309 «On measures to implement certain provisions of the Federal Law «About corruption counteraction»;
- Decree of the President of the Russian Federation from 8 July 2013 № 613 «Anti-corruption issues»;
- Decrees of the President of the Russian Federation with National Anti-Corruption Plans;
- Resolution of the Government of the Russian Federation from 5 July 2013 № 568 «About extension on separate categories of citizens of restrictions, prohibitions and obligations established by the Federal Law «About corruption counteraction» and other federal laws with a view of corruption counteraction»;
- Resolution of the Government of the Russian Federation from 22 July 2013 № 613 «About presentation by citizens applying for replacement of posts in organisations, created for tasks accomplishment put to the Government of the Russian Federation, and employees displacing posts in these organisations, of data on incomes, expenses, on property and

obligations of property character, check of reliability and completeness of presented data and observance by employees of requirements to office behaviour»;

- Resolution of the Government of the Russian Federation from 9 January 2014 № 10 «About the procedure to disclose by separate categories of persons gift receipt in connection with their official capacity or execution office (official) obligations by them, delivery and estimations of a gift, sale (redemption) and transfer of the funds obtained from its sale»;

- Resolution of the Government of the Russian Federation from 21 January 2015 № 29 «On the approval of the Rules of communication by the employer on the conclusion of a labour or civil law contract for the performance of work (the provision of services) with a citizen who replaced the posts of the state or municipal service, the list of which is established by regulatory legal acts of the Russian Federation»;

- the Strategy of development of the electric grid complex of the Russian Federation confirmed by Order of the Government of the Russian Federation from 3 April 2014 № 511-r;

- the Methodical recommendations about development and accepting of measures by the organisations to prevent and counteract corruption, developed by the Ministry of Labour and Social Protection of Russia, approved on 28.03.2014 –

- the Methodological recommendations on the organization of processes of managing of corruption risks and internal control in the field of preventing and combating corruption approved by Order of the Federal Property Management Agency from 2 March 2016 № 80.

- the Code of Corporate Governance, approved on 13 February 2014 at the meeting of the Government of the Russian Federation, approved on 21 March 2014 by the Board of Directors of the Bank of Russia and recommended for use by joint stock companies (hereinafter – the Code of Corporate Governance).

- the Anti-Corruption Charter of Russian Business, signed by the Commercial and Industrial Chamber of the Russian Federation, the Russian union of industrialists and businessmen, the All-Russian public organisation «Business Russia» and the All-Russian public organisation «OPORA Russia».

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

- Minutes and instructions of bodies of state power of the Russian Federation:

- Minutes of the Commission under the President of the Russian Federation concerning strategy of development of the fuel and energy complex and ecological safety from 10 July 2013 № A-60-26-8;

- Orders of the Government of the Russian Federation from 28 December 2011 № BP-P13-9308 and from 5 March 2012 № BP-P24-1269 on disclosing of the information on structure of proprietors of counterparties, on data representation about incomes, property and obligations of property character of senior managers, under the prevention and revealing of the conflict of interest and other abusings connected with occupied posts in Rosseti Centre, PJSC and SDCs;

- GOST R ISO 26000-2012 Guidelines on social responsibility;

- the Articles of Association of the Company.

Appendix 2
to the Anti-Corruption Policy
of the Company and
the Company's subsidiaries

Terms and definitions used in this Anti-Corruption Policy

Anti-corruption clause	A section of contracts, agreements, contracts of the Company and the Company's subsidiaries, declaring the position of the Company and the Company's subsidiaries in the field of combating corruption and not allowing corruption and other offenses
Anti-Corruption Policy	Organizational and administrative document of the Company, which consists of a set of interrelated principles, procedures and specific measures aimed at preventing and combating corruption. The concept applies to the Company and the Company's subsidiaries depending on the context
Anti-corruption obligations	Consent of a participant in the Company's procurement procedures and the Company's subsidiaries to comply with and comply with the principles and requirements of the Anti-Corruption Policy, including the obligation not to commit corruption and other offenses, to provide complete and reliable information on the chain of owners to individuals, as well as on the composition of executive bodies with attachment of supporting documents
Anti-corruption monitoring	Collection, analysis and generalization of measures implemented in the Company and the Company's subsidiaries in order to assess their effectiveness, analyze corruption factors and risks of their implementation; analysis and evaluation of data obtained as a result of control procedures; forecasting corruption offenses and developing ways to combat corruption
Giving a bribe	Giving a bribe to an official, a foreign official or an official of a public international organization personally or through an intermediary (including when the bribe is transferred to another individual or legal entity at the instruction of the official).

	<p>A foreign official is any person appointed or elected who holds any office in a legislative, executive, administrative or judicial body of a foreign state, and any person who performs any public function for a foreign state, including for a public department or public enterprise. Officials of a public international organization include, in particular, employees of the organization who are international civil servants, persons authorized to act on behalf of the public international organization, members of the parliamentary assemblies of international organizations to which the Russian Federation is a member, persons holding judicial positions of any international court, whose jurisdiction is recognized by the Russian Federation. (Article 291 of the Criminal Code of the Russian Federation)</p>
<p>Business gift (for the purposes of the Anti-Corruption Policy)</p>	<p>A gift that an employee of the Company and the Company's subsidiaries can receive in connection with official functions, business trips, other official events within the limits and norms determined by the legislation of the Russian Federation, as well as local regulations of the Company and the Company's subsidiaries</p>
<p>Abuse of authority</p>	<p>Use by a person performing managerial functions in a commercial or other organization of his powers contrary to the legitimate interests of this organization and in order to derive benefits and advantages for himself or other persons or to harm other persons, if this act caused significant harm to the rights and legitimate interests citizens or organizations or legally protected interests of society or the state.</p> <p>A person who performs managerial functions in a commercial or other organization, as well as in a non-profit organization that is not a state body, local government body, state or municipal institution is a person who performs the functions of a sole executive body, a member of the board of directors or another collective executive body, a person who permanently, temporarily or by special authority performs organizational and administrative or</p>

	administrative and economic functions in these organizations (Article 201 of the Criminal Code of the Russian Federation)
Foreign public officials and officials of public international organizations	According to the United Nations Convention against Corruption of 31 October 2003, "a foreign public official" is defined as any person appointed or elected who holds any position in the legislative, executive, administrative or judicial body of a foreign state, and any person who performs any - or a public function for a foreign state, including a public agency or state enterprise.
Commercial bribery	Illegal transfer of money, securities, other property to a person performing managerial functions in a commercial or other organization, as well as illegal provision of property services to him, provision of other property rights (including when, at the direction of such a person, property is transferred, or services of a property nature are, or property rights are granted to another individual or legal entity) for actions (inaction) in the interests of the giver or other persons, if these actions (inaction) are within the official powers of such a person or if he, by virtue of his official position, can contribute to these actions (inaction) (Article 204 of the Criminal Code of the Russian Federation)
Compliance	Compliance of the organization's activities with the requirements imposed on it by Russian and foreign legislation, local regulations, other mandatory regulatory documents
Counterparty	Any Russian or foreign legal or natural person with whom the Company or the subsidiary enters into contractual relations with the establishment of a different scope of rights and obligations (with the exception of labour relations), and which are not united by a common goal
A conflict of interest	personal interest (direct or indirect) of a person filling a position, the filling of which provides for the obligation to take measures to prevent and resolve conflicts of interest, affects or may affect the

	proper, objective and impartial performance of his official (office) duties (exercise of powers)
Corruption offense	An illegal guilty act (action or inaction) that has signs of corruption, for which, in accordance with the legislation of the Russian Federation, criminal, administrative, civil and disciplinary liability is provided
Corruption risk	Possibility of committing a corruption offense by an employee of the Company and the Company's subsidiaries
Corruption	a) abuse of official position, giving a bribe, receiving a bribe, abuse of power, commercial bribery or other illegal use by an individual of his official position contrary to the legitimate interests of society and the state in order to obtain benefits in the form of money, valuables, other property or services of a property nature, other property rights for themselves or for third parties or illegal provision of such benefits to the specified person by other individuals; b) the commission of the acts specified in subparagraph "a" of this paragraph, on behalf of or in the interests of a legal entity
Personal interest	Opportunity to receive income in the form of money, other property, including property rights, services of a property nature, results of work performed or any benefits (advantages) by an employee of the Company and/or the Company's subsidiaries and (or) being closely related to him or property of persons (parents, spouses, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and spouses of children), citizens or organizations with which an employee of the Company and/or the Company's subsidiaries and (or) persons who are them in close relationship or property, are connected by property, corporate or other close relations
Persons who are closely related or connected to the manager/employee	Parents, spouses, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and spouses of children

Material gain	Benefit in cash or in kind that can be assessed and defined as income in accordance with the tax legislation of the Russian Federation
Methodological recommendations of the Ministry of Labour	Guidelines for the development and adoption by organizations of measures to prevent and combat corruption, developed by the Ministry of Labour and Social Protection of the Russian Federation, approved on 28 March 2014
Illegal remuneration on behalf of a legal entity	<p>An illegal transfer, offer or promise on behalf of or for the benefit of a legal entity or for the benefit of an associated legal entity to an officer, a person exercising managerial functions in a commercial or other organization, a foreign officer, or an officer of a public international organization money, securities or other property, providing him with services of a property nature or granting him property rights (including if, on behalf of an official, a person performing managerial functions in a commercial or other organization, a foreign official or an official of a public international organization money, securities or other property is transferred, offered or promised, services of a property nature are provided or property rights are granted to another individual or legal entity) for the commission in the interests of this legal entity or in the interests of a legal entity associated with it by an official, a person performing managerial functions in a commercial or other organization, by a foreign official or an official of a public international organization of an action (inaction) related to his official position (Article 19.28 of the Code of Administrative Offenses).</p> <p>Officials are recognized as persons who permanently, temporarily or by special authority perform the functions of a representative of the authorities or perform organizational, administrative, administrative and economic functions in state bodies, local governments, state and municipal institutions, state non-budgetary funds, state corporations, state companies, state-run non-profit companies, at state and municipal unitary enterprises, in economic companies, in the supreme</p>

	governing body of which the Russian Federation, a constituent entity of the Russian Federation or a municipality has the right, directly or indirectly (through persons controlled by them), to dispose of more than fifty percent of the votes or in which the Russian Federation, a constituent entity of the Russian Federation or a municipal entity, has the right to appoint (elect) the sole executive body and (or) more than fifty percent of the composition of the collegial management body, in joint stock companies in respect of which the special right to participation of the Russian Federation, constituent entities of the Russian Federation or municipal formations in the management of such joint-stock companies (“golden share”), as well as in the Armed Forces of the Russian Federation, other troops and military formations of the Russian Federation (note 1 to Article 285 of the Criminal Code of the Russian Federation)
Illegal involvement in labour activity or in the performance of work or the provision of services of a state or municipal employee or a former state or municipal employee	Engagement by the employer or the customer of works (services) in labour activity under the terms of an employment contract or in the performance of work or the provision of services under the terms of a civil law contract of a state or municipal employee replacing a position included in the list established by regulatory legal acts, or a former state or municipal an employee who held such a position, in violation of the requirements provided for by the Anti-Corruption Law (Article 19.29 of the Code of Administrative Offenses)
Partner	Any Russian or foreign legal entity or individual with whom the Company or the Company’s subsidiaries enter into contractual relations aimed at achieving a common goal
Taking a bribe	Receipt by an official, a foreign official or an official of a public international organization personally or through an intermediary of a bribe in the form of money, securities, other property or in the form of illegal provision of services of a property nature to

	<p>him, the provision of other property rights (including when a bribe at the direction of an official person is transferred to another individual or legal entity) for actions (inaction) in favor of the briber or persons represented by him, if these actions (inaction) are within the official powers of the official or if he, by virtue of his official position, can contribute to these actions (inaction), and equal to general patronage or connivance in the service (Article 290 of the Criminal Code of the Russian Federation)</p>
Mediation in bribery	<p>Direct transfer of a bribe on behalf of the bribe giver or bribe taker or other assistance to the bribe giver and (or) bribe taker in reaching or implementing an agreement between them on receiving and giving a bribe in a significant amount, as well as a promise or offer of mediation in bribery (Article 291.1 of the Criminal Code of the Russian Federation)</p>
A pre-conflict situation	<p>A pre-conflict situation A situation in which an employee of the Company and/or the Company's subsidiaries, as well as the Customer/Procurement Organizer or his representatives, in the course of their official or professional activities, a personal interest arises that will lead to a conflict of interest</p>
Provocation of a bribe, commercial bribery or bribery in the field of procurement of goods, works, services to meet state or municipal needs	<p>An attempt to transfer to an official, a foreign official, an official of a public international organization, a person performing managerial functions in commercial or other organizations, or a person specified in part one of Article 200.5 of the Criminal Code of the Russian Federation (a contract service employee, a contract manager, a member of the procurement commission, a person accepting the delivered goods, performed works or rendered services, or another authorized person representing the interests of the customer in the field of procurement of goods, works, services to meet state or municipal needs) without his consent money, securities, other property or provision of services of a property nature, provision of other property rights for the purpose of artificially creating evidence of a</p>

	crime or blackmail (Article 304 of the Criminal Code of the Russian Federation)
Prevention of corruption	Activities of an organization aimed at introducing elements of a corporate culture, organizational structure, rules and procedures regulated by internal local acts that ensure the prevention of corruption offenses
Corruption detection	Activities of the organization to identify and eliminate the causes of corruption.
Countering corruption	Activities of the Company and the Company's subsidiaries, as well as employees of the Company and the Company's subsidiaries within the scope of their powers to prevent corruption, detect, prevent, suppress, disclose and internally investigate corruption offenses (fight against corruption), minimize and/or eliminate the consequences of corruption offenses.
An employee of the Company and the Company's subsidiaries	An employee with whom the Company or the Company's subsidiaries has concluded an employment or civil law contract.
A structural unit responsible for prevention of corruption offenses, combating corruption, compliance control	Department of corporate protection of the Company, Department of internal control and risk management of the Company within the competence, structural units of the Company's subsidiaries, which, according to the organizational structure of the Company's subsidiaries, perform the functions of preventing corruption offenses, combating corruption, compliance control.
A labour dynasty	is a group of employees of the production personnel of the Company who are closely related or connected to each other (parents, spouses, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and spouses of children) numbering at least three people representing at least two generations, characterized by the transfer of professional skills from the older generation to the younger
A procurement participant	A procurement participant is any legal entity or several legal entities acting on the side of one procurement participant, regardless of the legal form, ownership, location and place of origin of

	<p>capital, with the exception of a legal entity that is a foreign agent in accordance with Federal Law dated 14 July 2022 No. 255-FZ "On Control over the Activities of Persons Under Foreign Influence", or any individual or several individuals acting on the side of one procurement participant, including an individual entrepreneur or several individual entrepreneurs acting on side of one procurement participant, with the exception of an individual, acting as a foreign agent in accordance with Federal Law dated 14 July 2022 No. 255-FZ "On Control over the Activities of Persons Under Foreign Influence".</p>
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<p>The consolidated list of anti-corruption measures carried out in the Company and the Company's subsidiaries</p> <p>The implementation mechanism of the Anti-Corruption Policy of the Company and the Company's subsidiaries/Anti-corruption measures</p>
1. Determination of the functions and tasks of units and officials responsible for the prevention of corruption offenses and the prevention of corruption
1.1. Updating the Anti-Corruption Policy (tasks, functions, duties and powers of structural units or officials responsible for the prevention of corruption offenses, combating corruption, compliance control)
1.2. Determination of the functions of structural units responsible for the prevention of corruption offenses, combating corruption, compliance control
<p>2. Organization of the process of managing corruption risks and internal control in the Company and the Company's subsidiaries</p>
2.1. Analysis of business processes, determination of the control environment, identification, description, assessment of corruption risks (maintaining a register (list), certificates, changing the map of corruption risks, determining the owners of corruption risks, the list of positions with a high corruption risk).
2.2. Description of factors of corruption risks and determination of consequences of their implementation
2.3. Development of a set of measures to eliminate and minimize corruption risks.
2.4. Establishing specific anti-corruption procedures and requirements, including regular filling out declarations of a conflict of interest.
2.5. Evaluation of the effectiveness and control of existing measures to minimize corruption risks of the Company and the Company's subsidiaries. Monitoring of risk factors.
2.6. Development of new and improvement of existing measures to minimize corruption risks.
2.7. Annual updating of certificates of corruption risks.
2.8. Verification of compliance with the requirements of the Anti-Corruption Policy in the Company and the Company's subsidiaries.
2.9. Monitoring and control of the economic feasibility of the expenses of the Company and subsidiaries in areas with a high corruption risk (exchange of business gifts, entertainment expenses, charitable donations, remuneration to external consultants, etc.), including through a mechanism for checking the validity of the calculation of the initial (maximum) purchase price
<p>3. Monitoring the functioning of the risk management and internal control system in the field of preventing and combating corruption and assessing their effectiveness</p>

3.1. Conducting a self-assessment of the effectiveness of corporate and process controls in the field of combating and preventing corruption.
3.2. Conducting an internal independent assessment of the internal control and risk management system by the internal audit unit (checking the reliability of procedures for combating illegal actions, abuse and corruption).
3.3. Conducting an external independent assessment of the effectiveness of the risk management and internal control system (hereinafter referred to as the RMICS) in the field of combating and preventing corruption, with the submission of the results of the audit for consideration by the Board of Directors of the Company and the boards of directors of the Company's subsidiaries.
3.4. Providing the Board of Directors of the Company (with preliminary consideration by the Audit Committee under the Board of Directors) and the boards of directors of the Company's subsidiaries of reports on the results of anti-corruption monitoring.
4. Prevention and management of conflicts of interest
4.1. Development and implementation of provisions on conflict of interest (procedure for informing employees of the Company and the Company's subsidiaries about the occurrence of a conflict of interest and settlement of an identified conflict of interest, fixing the duties and responsibilities of employees, typical situations of pre-conflict of interest, etc.), forms of declarations of a conflict of interest.
4.2. Updating the work procedure of working collegiate bodies (commissions) to consider issues related to the settlement of conflicts of interest (the Central Commission for Compliance with Corporate Ethics and Settlement of Conflicts of Interest in Rosseti Centre, PJSC and commissions in the Company's subsidiaries).
4.3. Carrying out an audit of the fact of a conflict of interest of employees with participation of structural divisions of the Company and subsidiaries responsible for prevention of corruption offenses, combating corruption, compliance control
4.4. Bringing to the attention of employees about the adopted local regulations (hereinafter referred to as the regulation) to resolve conflicts of interest and the obligation to comply with the requirements contained therein.
4.5. Organization and provision of work to resolve conflicts of interest.
4.6. Organization of the declaration of conflicts of interest by candidates in the course of employment in the Company and the Company's subsidiaries, as well as in the course of transfer to management positions.
4.7. Organization of annual declaration of a conflict of interest by employees of the Company and the Company's subsidiaries
4.8. Analysis of the information obtained during the declaration of a conflict of interest by employees of the Company and the Company's subsidiaries
4.9. Submission of a report on declaring a conflict of interest by employees of the Company and the Company's subsidiaries to the Central Commission for Compliance with Corporate Ethics and Settlement of Conflicts of Interest in Rosseti Centre, PJSC.

4.10 Organization of the annual declaration of information on income, property and liabilities of a property nature of persons determined by the regulation of the Company and the Company's subsidiaries in accordance with the regulatory legal acts of the Russian Federation.
4.11 Development of measures to resolve a pre-conflict situation, settle a conflict of interest of a manager or employee (including review or change of job duties and labour functions, removal from decision-making, which is the subject of a conflict of interest, transfer to another position, termination of an employment contract, etc.).
4.12 Control over the application of liability measures provided for by law in each case of non-compliance with prohibitions, restrictions and requirements established in order to combat corruption, including measures to prevent and (or) resolve conflicts of interest.
5. Development and implementation in the activities of the Company and the Company's subsidiaries of standards and procedures aimed at ensuring conscientious work
5.1. Development (together with the participation of public associations) and implementation of a set of organizational, explanatory and other measures to ensure that employees of the Company and the Company's subsidiaries comply with prohibitions, restrictions and requirements established by the Anti-Corruption Law.
5.2. Updating the Code of Corporate Ethics and Official Conduct of the Company's Employees
5.3. Establishing a ban on hiring persons who are in close relationship or property, if this is due to the subordination or control of one of them to another.
5.4. Development and updating of the rules governing the exchange of business gifts and signs of business hospitality, charity and sponsorship
5.5. Concluding agreements with employees of the Company and the Company's subsidiaries on compliance with the requirements of the Anti-Corruption Policy.
5.6. Participation in the screening of candidates for filling positions in the Company and the Company's subsidiaries in order to prevent a corruption component, to eliminate a conflict of interest.
5.7. Taking measures to prevent the misuse of insider information and market manipulation.
5.8. Development and implementation of anti-corruption provisions in labour, civil law contracts with employees of the Company and the Company's subsidiaries, contracts/agreements with contractors and partners.
6. Consideration and verification of information about possible facts of corruption and other abuses
6.1. Monitoring the implementation of the regulation on the procedure for considering reports of possible facts of corruption in the Company and the Company's subsidiaries (the procedure for receiving, considering and resolving applications, the timing of consideration, the procedure for interacting with structural divisions, introducing a procedure for informing the employer's employees about cases of inciting them to commit corruption violations, etc.).
6.2. Monitoring the continuous operation of available information transmission channels, feedback mechanisms, helpline, hotline, etc. Control over the placement and updating of

information on the channels of employees' appeals in production departments, Distribution Zones of the Company's subsidiaries.
6.3. Control of the organization and provision of work on the consideration of appeals. Participation of responsible employees of the Company's subsidiaries in the consideration of appeals received by the Company.
6.4. Analysis and monitoring of compliance with prohibitions, restrictions and requirements established for the purpose of combating corruption, including those related to the receipt of business gifts by certain categories of persons, the performance of other paid work, the obligation to notify about appeals in order to induce corruption offenses.
6.5. Introducing procedures to protect workers who report corruption offences.
7. Legal education and formation of the foundations of law-abiding behaviour of employees, counselling and training of employees
7.1. Development and publication of methodological and informational and explanatory materials on anti-corruption standards of conduct.
7.2. Posting information on measures to implement the Anti-Corruption Policy of the Company and the Company's subsidiaries on the official corporate websites of the Company and the Company's subsidiaries, in the corporate newspaper, mass media and other sources of information.
7.3. Ensuring, when interacting with the media, the dissemination of positive experience in countering attempts by employees and the Company to corruption pressure.
7.4. Ensuring annual advanced training of employees whose job responsibilities include participating in the fight against corruption, according to the educational program of two levels (basic - for students for the first time and advanced - for those who have completed training earlier).
7.5. Carrying out training and educational activities on prevention and combating corruption (trainings, seminars, conferences, forums, round tables, etc.) aimed at informing the employees of the Company and the Company's subsidiaries about the requirements of the legislation of the Russian Federation, applicable international anti-corruption legislation, and at the formation of anti-corruption consciousness of employees.
7.6. Carrying out work to form a negative attitude towards corruption among the employees of the Company and the Company's subsidiaries.
7.7. Organization of individual consultations for employees of the Company and the Company's subsidiaries on the application (observance) of anti-corruption standards and procedures.
7.8. Ensuring, in cooperation with educational and scientific organizations, holding regular public lectures on anti-corruption topics in the Company's subdivisions, the Company's subsidiaries
7.9. Organization of annual seminars-meetings by the subdivision of the Company responsible for prevention of corruption offenses, combating corruption on the application of the legislation of the Russian Federation on combating corruption with the heads of subdivisions of the

Company's subsidiaries responsible for prevention of corruption offenses, combating corruption, compliance control
8. Taking measures to prevent corruption when interacting with partners and contractors
8.1. Control over the implementation of special procedures for checking counterparties in order to reduce the risk of involving employees of the Company and the Company's subsidiaries in corrupt activities and other unfair practices (improving the unified automated system for analyzing and collecting information about the beneficiaries of counterparties (ASIB), which provides for checking the level of reliability and financial stability of counterparties (the absence of dishonest suppliers in the register, the presence of a negative information background, etc.)).
8.2. Control over the implementation in the Company and the Company's subsidiaries of a single mechanism for anti-corruption control of procurement activities (including the Anti-Corruption Standard for procurement activities).
8.3. Updating the regulation on the organization of work to disclose information about the chain of owners of procurement participants and counterparties of the Company and the Company's subsidiaries.
8.4. Distribution among contractors and partners of programs, policies, standards of conduct, procedures and rules aimed at preventing and combating corruption that are applied in the Company and the Company's subsidiaries (anti-corruption obligations, anti-corruption standard, anti-corruption clause, etc.).
8.5. Informing the public about the degree of implementation and progress in the implementation of anti-corruption measures (posting relevant information on the official websites of the Company and the Company's subsidiaries, in the media and other sources).
9. Interaction with state bodies exercising control and oversight functions, cooperation with law enforcement agencies in the field of combating corruption
9.1. Development and approval of the regulation on the procedure for the interaction of the Company with control and regulatory and law enforcement agencies.
9.2. Interaction with federal government agencies on the practical application of the provisions of the legislation in the field of prevention and combating corruption, improving the regulatory legal framework, including the development of proposals for amending the current regulatory legal acts of the Russian Federation in the field of preventing and combating corruption, participation in working (expert) groups under the General Prosecutor's Office of the Russian Federation, Rosfinmonitoring, the Chamber of Commerce and Industry of the Russian Federation, etc.
9.3. Assistance in detection and investigation of corruption offenses by law enforcement agencies.
9.4. Assistance in conducting inspections and not obstructing the legitimate activities of inspectors, informing them of cases of corruption offenses.

10. Participation in collective initiatives for detection and prevention of corruption
10.1. Implementation of the provisions of the Anti-Corruption Charter of Russian Business:
10.1.1. Organization and provision of work on interaction with representatives of the Russian business community: the Chamber of Commerce and Industry of the Russian Federation, the All-Russian public organizations "Russian Union of Industrialists and Entrepreneurs", "Business Russia", "OPORA Russia" and other participants of the Charter (participation in working groups, joint learning, etc.).
10.1.2. Carrying out activities aimed at preventing and combating corruption: - ensuring compliance with the requirements for the Company as a participant in the Anti-Corruption Charter of Russian Business; - participation in the work of the interdepartmental working group of the Ministry of Labour and Social Protection of the Russian Federation on the implementation in state bodies and organizations of the requirements of the legislation of the Russian Federation on combating corruption.
10.2. Participation in other collective initiatives:
10.2.1. Use of standard anti-corruption clauses in joint agreements.
10.2.2. Placement on corporate websites of a public appeal of the head of the Company to employees, counterparties, partners of organizations about the rejection of corruption and bribery.
10.2.3. Public denial of joint activities with organizations (persons) involved in corruption crimes.
10.2.4. Participation of specialists of the Company and the Company's subsidiaries in international and other anti-corruption events.
11. Countering bribery of foreign public officials and officials of public international organizations
11.1. Development and approval of the regulation on measures to counter bribery of foreign public officials (a procedure for reporting by employees of facts of bribery of foreign public officials that have become known to them, sending information to the Investigative Committee of the Russian Federation, measures to counter bribery).
11.2. Interaction with representatives of state authorities and law enforcement agencies of the Russian Federation, diplomatic and trade missions of the Russian Federation abroad, international and other organizations in order to develop and improve measures to counter bribery of foreign public officials and officials of public international organizations in international commercial transactions, with carrying out the activities of the Company and the Company's subsidiaries.
11.3. Monitoring the effectiveness of measures taken to counter bribery of foreign public officials and officials of public international organizations.

12. Adoption, analysis of application and revision of the Anti-Corruption Policy
12.1. Monitoring of international standards, anti-corruption legislation of the Russian Federation, regulation of the Company and the Company's subsidiaries in the field of prevention and combating corruption.
12.2. Evaluation of the effectiveness of implementation of the Anti-Corruption Policy.
12.3. Revising and amending the Anti-Corruption Policy.