Appendix No. 2
to the resolution of the Board of Directors
of Rosseti Volga, PJSC dd. 02.08.2023
(Minutes No. 3 dated 04.08.2023)

Anti-Corruption Policy of Rosseti Volga, PJSC and Subsidiaries of Rosseti Volga, PJSC

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1. General Provisions

1.1. The Anti-Corruption Policy of Rosseti Volga, Public Joint-Stock Company and subsidiaries of Rosseti Volga, Public Joint-Stock Company (hereinafter referred to as the "Anti-Corruption Policy") is a unified fundamental document defining the goals, objectives, principles and measures in the field of preventing and combating corruption in Rosseti Volga, PJSC (hereinafter referred to as the "Company") and subsidiaries of Rosseti Volga, PJSC (hereinafter referred to as the "SC").

1.2. In accordance with the requirements of Article 13.3 of Federal Law No. 273-FZ dated 25.12.2008 "On Combating Corruption" (hereinafter referred to as the "Anti-Corruption Law"), the Anti-Corruption Policy defines measures in the Company and the Company's SC to prevent corruption: determination of units or officials responsible for preventing corruption and other offenses; 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 conduct of employees; prevention and resolution of conflicts of interest; prevention of informal reporting and the use of counterfeit documents.

1.3. The Company and its SCs actively implement standards and procedures aimed at ensuring fair work.

1.4. The Company and its SCs follow anti-corruption standards aimed at open, responsible and fair performance of activities stipulated by the charters of the Company and its SCs, minimization of corruption offenses in the power grid complex that affect consumer trust, business reputation of the Company and its SCs.

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 its SCs is developed is given in Appendix 1, which is an integral part of this Anti-Corruption Policy.

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

2. Terms and Definitions

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

2.2. In the event of a conflict between the regulatory legal act of the Russian Federation in the field of anti-corruption, as a result of amendments made to it, and the definition of the 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 prevail.

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 applicable anti-corruption legislation and generally accepted standards;
- respect for lawful rights and interests of stakeholders, employees of the Company and its SCs, protection of business reputation of the Company and its SCs, partners, and other

stakeholders, compliance with confidentiality restrictions in the implementation of anti-corruption measures;

- exemplary behavior of management in the formation of a culture of intolerance against corruption and the creation of an internal organizational system for preventing (proactive management) and combating corruption;
- building the risk management and internal control process for prevention and combating anti-corruption within the framework of the unified risk management and internal control system of the Company and its SCs;
- employee involvement: awareness of the Company's employees and the Company's SCs about the provisions of anti-corruption laws and their active participation in the development and implementation of anti-corruption standards and procedures in the Company and its SCs;
- adequacy of anti-corruption procedures and their correspondence to the amount of possible damage in case of materialization of corruption risk;
- effectiveness of anti-corruption procedures: conducting anti-corruption activities that ensure ease of implementation and bring significant results;
- responsibility and inevitability of punishment for employees of the Company and SCs regardless of their position, length of service and other conditions, in case of corruption offenses;
- openness in the implementation of activities provided for by the charters of the Company and its SCs: informing partners, counterparties, and the public about anti-corruption measures taken in the Company and its SCs;
- ongoing control and regular monitoring of the effectiveness of implemented anti-corruption procedures.

3.2. Goals of the Anti-Corruption Policy

The goal of the Anti-Corruption Policy of the Company and its SCs is a unified approach to compliance with the requirements of Article 13.3 of the Law on combating corruption and other regulatory legal acts of the Russian Federation in the field of combating corruption, development and adoption of measures to prevent and combat corruption: identification and subsequent elimination of the causes of corruption (prevention of corruption); detection, prevention and suppression of corruption and other offenses; minimizing and (or) eliminating the consequences of corruption and other offenses, reducing the risks of bringing the Company and its SCs 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 its SCs under Article 290 of the Criminal Code of the Russian Federation (hereinafter referred to as the “Criminal Code of the Russian Federation”) “Receiving 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 applicable law of the Russian Federation for corruption offenses.

The Anti-Corruption Policy of the Company and its SCs is aimed at implementing the requirements of the Company's Corporate Governance Code, including in terms of defining measures to form elements of the corporate culture, organizational structure, rules and procedures ensuring the prevention of corruption, assessment of the reliability of procedures for countering illegal actions, abuse and corruption, as well as verification of compliance by employees of the Company and the Company's SCs with the provisions of the law of the Russian Federation and local regulations of the Company and the Company's SCs, regarding confidential information, anti-corruption, compliance with the requirements of the Code of

Corporate Ethics and Official Conduct of Employees of the Company and Codes of Corporate Ethics and Official Conduct of Employees of the Company's SCs.

3.3. Objectives of the Anti-Corruption Policy:

3.3.1. determination of key directions for meeting the requirements of Article 13.3 of the Anti-Corruption Law and other regulatory legal acts of the Russian Federation in the field of anti-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, Protocol of the Presidential Commission on the Development Strategy of the Fuel and Energy Complex and Environmental Safety No. A-60-26-8 dated July 10, 2013; instructions of the Government of the Russian Federation No. ВП-П13-9308 dated December 28, 2011 and No. ВП-П24-1269 dated March 5, 2012 and other instructions of the Government of the Russian Federation and a shareholder represented by the Russian Federation, as well as methodological recommendations of the Ministry of Labor of Russia in the field of anti-corruption;

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

3.3.4. identification, assessment and description of corruption risks, development of procedures for their mitigation, monitoring of efficiency of measures;

3.3.5. making employees of the Company and its SCs feel responsible for their actions and behavior;

3.3.6. making members of management and control bodies of the Company and its SCs, employees of the Company and its SCs, partners and counterparties understand clearly the position of the Company and its SCs about intolerance against corruption in all forms and manifestations;

3.3.7. minimization of risks of involvement of employees of the Company and its SCs in the activities related to corruption offenses.

4. Main measures to prevent corruption in the Company and its SCs

4.1. Determination of functions and tasks of the Company's structural divisions and structural divisions of the Company's SCs responsible for prevention of corruption offenses, anti-corruption, compliance control;

4.2. Development and implementation of a set of standards and procedures aimed at ensuring fair work;

4.3. Familiarization of employees of the Company and its SCs with the codes of ethics and official conduct of employees of the Company and its SCs;

4.4. Identification and assessment of corruption risks in accordance with local regulations of the Company and local regulations of its SCs;

4.5. Development of procedures for minimizing identified corruption risks together with owners of corruption risk;

4.6. Identification and resolution of conflicts of interest;

4.7. Development of control procedures to minimize the risk of holding the Company or its SCs liable under Article 19.28 of the Code of Administrative Offenses;

4.8. Cooperation with law enforcement agencies in the field of anti-corruption, reporting of identified offenses, providing assistance in inspections;

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

5. Persons Governed by the Anti-Corruption Policy and their General Responsibilities

5.1. Persons, governed by this Anti-Corruption Policy include management and control bodies of the Company and management and control bodies of its SCs, employees of the Company and its SCs, regardless of their position and functions, as well as partners and counterparties of the Company and/or its SCs, other persons due to mutual obligations between them and the Company and its SCs, including “anti-corruption obligations” and other “anti-corruption agreements”.

5.2. The general responsibilities of management and control bodies of the Company, management and control bodies of its SCs, employees of the Company and its SCs:

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

- refrain from conduct that may be interpreted by others as willingness to give or receive a bribe, offer or promise mediation in transferring or receiving a bribe, including on behalf of or for the benefit the Company and/or its SCs;
- refrain from receiving business gifts from partners and counterparties of the Company and/or its SCs, including the transfer of business gifts to other employees of the Company and its SCs, except for the receipt of business gifts by the employee in connection with hospitality 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 work;
- inform the Company's structural division and/or the structural division of the Company’s SC responsible for prevention of corruption offenses, anti-corruption, compliance control on cases of inclination to commit corruption offenses;
- inform the structural division of the Company and/or structural division of the Company's SC responsible for prevention of corruption offenses, anti-corruption, compliance control about the conflict of interest or risk of conflict of interest, about the fact of committing corruption offenses by other employees of the Company and/or SCs of the Company, partners, counterparties and employees of the counterparty of the Company and/or SCs of Company or other persons.

5.3. Partners and counterparties of the Company and its SCs are informed that they shall:

- comply with the requirements of the anti-corruption clause, other anti-corruption obligations and agreements contained in contracts concluded between the Company or the Company's SCs and partners, counterparties of the Company or the Company's SCs;
- comply with the Anti-Corruption Procurement Standard, which is an appendix to the Unified Procurement Standard of Rosseti, PJSC (Regulations on Procurement), provide the information and documents required by the Company and its SCs (information regarding the entire chain of owners to an individual, consent to the processing of personal data and other information);
- refrain from committing or participating in the commission of corruption offenses, demonstrate behavior that can be interpreted as a willingness to give or receive a bribe, be an intermediary in transferring or receiving a bribe.

5.4. The Company and its SCs recommend that partners and counterparties of the Company and its SCs, in case of induction to give or receive a bribe, as well as mediation to transfer or receive a bribe, inform the Company or its SC.

5.5 The Company and its SCs recommend that partners and counterparties refrain from giving business gifts to the management bodies of the Company and the management bodies of its SCs, employees of the Company and its SCs.

6. Anti-Corruption Policy Implementation Mechanism

6.1. Definition of Functions and Tasks of Divisions and Officials Responsible for Prevention of Corruption Offenses and Prevention of Corruption

6.1.1. Board of Directors of the Company and Boards of Directors of its SCs, executive bodies of the Company, in accordance with the Charter of Rosseti, PJSC and the sole executive bodies of the Company’s SCs, according to the relevant charters of the Company's SCs, Deputy General Director of the Company for Safety, a division of the Company and structural divisions of the Company's SCs responsible for prevention of corruption offenses, anti-corruption, compliance control ensure compliance by the Company's employees and employees of the Company's SCs with the fundamental principles, tasks and requirements of this Anti-Corruption Policy in the Company and its SCs and monitor the effectiveness of Anti-Corruption Policy measures.

6.1.2. The Board of Directors of the Company and the Boards of Directors of its SCs shall:

- determine key strategic directions of the Anti-Corruption Policy. The Board of Directors approves the Anti-Corruption Policy of the Company, the Company’s SCs accede the Anti-Corruption Policy of the Company through a decision of the Board of Directors of the Company’s SC;
- monitor the results of implementation and application of the Anti-Corruption Policy;
- carry out general control over the implementation, discipline of implementation and operational effectiveness of the Anti-Corruption Policy measures.

6.1.3. Executive bodies of the Company and sole executive bodies of its SCs shall:

- be responsible for organization of all measures aimed at implementation of the principles and requirements of the Anti-Corruption Policy, including appointment of the Company's officials and the Company's SCs responsible for implementation of the anti-corruption policy in the Rosseti Group of Companies, prevention of corruption offenses, anti-corruption, compliance control;
- give the Company's division and structural divisions of the Company's SCs responsible for prevention of corruption offenses, anti-corruption, compliance control with the powers sufficient to carry out anti-corruption measures in the Company and its SCs, including in relation to persons holding senior positions in the Company and its SCs, provide the necessary personnel and technical resources;
- approve the register of corruption risks, the list of owners of corruption risks, consider a report on minimizing corruption risks;
- ensure annual review by the Company's Board of Directors and Boards of Directors of the Company's SCs of reports on compliance with this Anti-Corruption Policy and reports on compliance with anti-corruption policies of the Company's SCs (report on the results of Anti-Corruption Monitoring).

6.1.4. In accordance with the Strategy of the electric grid complex of the Russian Federation, the Company's structural division responsible for preventing corruption offenses and combating corruption is the center of coordination and control of the activities of the Company's SCs in the field of preventing and combating corruption.

6.1.5. The structural division of the Company and its SCs responsible for preventing corruption offenses, combating corruption, compliance control takes part in the annual seminar-meeting held at Rosseti, PJSC on improving anti-corruption activities in the Rosseti Group of Companies.

6.1.6. Structural divisions of the Company and its SC responsible for prevention of corruption offenses, anti-corruption, compliance control shall:

- develop and introduce in the Company and its SCs a unified methodology in the field of anti-corruption policy implementation aimed at prevention, detection and suppression of corruption offenses, as well as minimization of corruption and reputational risks;
- carry out measures aimed at implementing the principles and requirements of the Anti-Corruption Policy;
- develop, revise the plan of anti-corruption measures;
- carry out compliance control over the activities of the Company and its SCs in the field of anti-corruption;
- carry out control measures aimed at detecting corruption and other offenses;
- carry out anti-corruption control of procurement activities of the Company and its SCs;
- organize reception and review of appeals received through the hotline (employees, counterparties of the Company and its SCs, other individuals and legal entities) about possible facts of corruption and fraud;
- organize conduction of events in the Company and its SCs aimed at management of the conflicts of interest, internal ethical requirements, and among other things:
- organize the filling out and consideration of conflict of interest declarations;
- organize an audit of information on property, income and obligations of a property nature of persons determined by local regulations of the Company and local regulations of the Company's SCs on the provision of such information, their spouses and minor children, for reliability, identification of signs of affiliation, conflict of interests, pre-conflict situation and other abuses related to positions held in the Company;
- organize inspections of employees hired by the Company and its SCs for the reliability of documents submitted for employment and presence of information of a compromising nature in relation to such employees;
- organize training activities on preventing and combating corruption, as well as individual counseling of employees;
- arrange for improvement of the efficiency of the outreach and educational measures aimed at creating an atmosphere of intolerance against corruption offenses in the company;
- provide assistance to authorized representatives of control, supervisory and law enforcement agencies of the Russian Federation during their inspections of activities of the Company and/or its SCs on issues of prevention 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 law enforcement intelligence;
- prepare reports on the implementation of anti-corruption policies and plans of anti-corruption measures (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;
- arrange for exchange of experience between structural divisions of the Company and its SCs in order to increase the effectiveness of measures to combat and prevent corruption and legal education of employees;

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

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

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

- organize and monitor the Russian, applicable foreign and international anti-corruption legislation and monitor the amendments thereto, as well as relevant case law;

- carry out scheduled and unscheduled inspections of compliance with the principles of this Anti-Corruption Policy, prepare reports on the results of inspections;

- develop documents in the field of preventing and combating corruption and initiate updating of documents in connection with changes in the legislation of the Russian Federation in the field of anti-corruption.

6.1.7. The Corporate Ethics Compliance and Conflict of Interest Resolution Commission is a collegial body of the Company that:

- reviews issues related to the resolution of pre-conflict/conflict of interests in the Company and its SCs, 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 corporate ethics standards and resolution of conflicts of interests of employees of the Company's SCs.

6.2. Organization of the Process of Managing Corruption Risks and Internal Control in the Company and its SCs

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

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

6.3. Prevention and Resolution of Conflicts of Interest

In order to manage the risk of a conflict of interest, the influence of the personal interest of the Company's employees and employees of the Company's SCs on their official duties, business decisions, the following measures aimed at identification, prevention and resolution of conflicts of interest shall be taken by the Company and SCs of the Company:

6.3.1. Development and adoption of local regulations establishing the procedure for identifying and resolving situations of pre-conflict/conflict of interest that may arise among employees of the Company and its SCs in the process of performing their functions and duties.

6.3.2. Informing all employees of the Company and its SCs about local regulations adopted in the Company and its SCs in the field of conflict of interest resolution.

6.3.3. Adherence to the following principles when identifying and resolving conflicts of interest:

- mandatory disclosure of information on a real or potential conflict of interest;

- individual review and assessment of factors of corruption and reputational risks in case of identification of each conflict of interest and its resolution;

- confidential nature of the process of disclosure of information about the conflict of interest and the process of its resolution;

- maintaining the balance of interests of the Company and its SCs, as well as their employees in resolving conflicts of interest;

- protection of the rights of the Company's employee and the employees of the Company's SCs in connection with a statement of a conflict of interest, which was timely disclosed by the Company's employee or an employee of the Company's SC and resolved (prevented) by the Company or the Company's SCs.

6.3.4. Establishment of the following responsibilities for the Company's employees and employees of its SCs:

- act in the best interests of the Company and the Company's SCs 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 existing (real) or potential conflict of interest, including reporting the occurrence of a conflict of interest, fill out conflict of interest declarations;

- assist in the resolution of the conflict of interest.

6.3.5. Various types of disclosure of conflicts of interest are established: at a time of hiring, appointment to a new position, as situations of conflict of interest arise, during annual declarations of conflict of interest.

6.3.6. Arrangement of mandatory completion of conflict of interest declarations.

6.3.7. Determination of persons responsible for receiving information on conflicts of interest.

6.3.8. Establishment of a ban on the conclusion of contracts/agreements with persons with identified conflict of interest, affiliation and other abuses of rights or authority.

6.3.9. Establishment of ways to resolve conflicts of interest.

6.3.10. Determination of typical pre-conflict/conflict of interest situations.

6.3.11. Arrangement for functioning of the Corporate Ethics Compliance and Conflict of Interest Resolution Commission.

6.4. Development and Implementation of Standards and Procedures Aimed at Ensuring Fair Work in the Activities of the Company and its SCs

The Company and its SCs are interested in fair work and ethical behavior of the Company's employees and employees of the Company’s SCs, and for this purpose they:

6.4.1. Develop and implement codes of ethics and official conduct of employees of the Company and its SCs, which define:

- general values and operating principles of the Company and its SCs;

- specific rules and standards of conduct of employees of the Company and its SCs, aimed at formation of ethical, fair conduct of employees of the Company and its SCs.

6.4.2. Perform verification of information on income, property and obligations of a property nature, in respect of persons applying for filling positions subject to declaration, and employees who fill these positions in the Company and its SCs, and their close relatives, in accordance with the internal organizational and administrative documents of the Company and its SCs, in order to identify conflicts of interest, facts of affiliation and other abuses.

6.4.3. Check the information about persons employed or working under civil law contracts in order to minimize the risks of prosecution under Article 19.29 of the Code of Administrative Offenses.

6.4.4 Adhere to the principles of honesty and objectivity during the staffing process (including hiring of senior managers):

- employees of the Company and its SCs are appointed or transferred to higher positions only on the basis of business proficiency, competence, experience;

- the prohibition on employment of close relatives and close kin is established if the performance of their official duties is related to the direct subordination or control of one of them to the other;

- direct subordination or control of employees being close relatives or being in close kin relations is allowed in exceptional cases by decision of the Central Corporate Ethics Compliance and Conflict of Interest Resolution Commission;

- labor dynasties are welcome in the Company and its SCs. Situations related to production personnel being in direct/direct subordination to close relatives whose labor activities may be classified as labor dynasties are recognized as permitted by the decision of the Corporate Ethics Compliance and Conflict of Interest Resolution Commission of the Company and its SCs subject to the conditions of inclusion in the labor dynasty;

- the obligation of certain employees of the Company and its SCs to provide the information specified in clause 6.4.2 of the Anti-Corruption Policy is established.

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

6.4.6 Establish the obligation to notify the employees of the Company and its SCs of all cases when they receive a business gift.

6.4.7 Prohibit giving/receiving by employees of the Company and its SCs of business gifts in accordance with the law of the Russian Federation and local regulations of the Company and its SCs.

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

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

6.4.10 Ensure anti-corruption expertise of local regulatory acts of the Company and its SCs, as well as within the competencies of draft regulatory legal acts of the Russian Federation.

6.4.11 Monitor the accounting indicators, the availability and reliability of primary documents, including accounting and writing off receivables, the appropriateness of expenses, periods of adjustment of indicators, the availability and reliability of primary documents, etc.

6.4.12 In the case of charitable or sponsorship activities, act on the basis of the principle of transparency, without pursuing the goal of obtaining or maintaining an advantage in the business activities of the Company and its SCs, in accordance with the requirements of the law of the Russian Federation and local regulations of the Company and its SCs.

6.5. Laying the Groundworks of Law-abiding Behavior of Employees and Legal Education

6.5.1. The Company and its SCs carry out the outreach activities for the employees of the Company and SCs in order to prevent corruption:

- provide access to this Anti-Corruption Policy and other local regulations of the Company and the Company's SCs related to anti-corruption issues;

- create and improve the Anti-Corruption Policy sections on the Company's official websites and official websites of its SCs;

- post information on the implemented activities of this Anti-Corruption Policy in corporate press, in mass media;

- ensure, in cooperation with the mass media, the dissemination of positive experience in countering attempts of corruption pressure by employees of the Company and its SCs;

- organize anti-corruption measures and social actions;

- provide advanced training for the Company's employees and employees of the Company's SCs, whose duties include prevention of corruption offenses and countering corruption, compliance control according to the two tier educational program (basic – for first-time students and advanced – for previously trained students);

- encourage employees of the Company and its SCs to provide confirmed information on corruption and other violations in the Company and its SCs;

- ensure that no employee of the Company and its SCs will suffer in either career or financial terms if he/she refuses corruption actions, even if such refusal leads to losses for the Company and its SCs;

- oblige employees of the Company and its SCs to sign an agreement on compliance with the principles and requirements of the Anti-Corruption Policy of the Company and its SCs, as well as anti-corruption legislation of the Russian Federation;

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

6.5.2. Take into account compliance by employees of the Company and its SCs with the principles and requirements of the Anti-Corruption Policy when forming a candidates pool for nomination to higher positions in the Company and its SCs.

6.6. Consulting and Training of Employees of the Organization

6.6.1 The Company and its SCs organize training of employees on issues of preventing and combating corruption:

- conduct educational activities and outreach campaigns (briefing, training sessions, seminars, questionnaires and tests of the Company's employees and employees of its SCs) aimed at informing the Company's employees and employees of the Company’s SCs about the requirements of the law of the Russian Federation, applicable foreign laws in the field of anti-corruption, formation of anti-corruption consciousness of the Company's employees and employees of SCs, and also provide explanations on the following:
- the concept of corruption in the public and private sector;
- procedures of this Anti-Corruption Policy;
- circumstances, situations (factors, scenarios of corruption risk) in which a bribe can be offered, received;
- key signs of corruption;
- officials of the Company and its SCs that should be contacted and means of communication for reporting any potential corruption;
- liability for committing corruption offenses;
- requirements of the law of the Russian Federation and local regulations of the Company and its SCs in the field of prevention and combating corruption and the procedure for their application;
- procedure for identification and resolution of conflicts of interest;
- acceptable behavior in situations of corruption risk, in particular, in cases of bribe solicitation by officials of state bodies, local authorities, state and municipal institutions, state and municipal unitary enterprises, state corporations, public companies and other organizations;
- procedure for interaction with law enforcement agencies;

- provide individual counseling for the Company's employees and employees of the Company's subsidiaries on issues of preventing and combating corruption in compliance with the confidentiality principles;

- in cooperation with educational and scientific organizations ensure holding of regular public lectures on anti-corruption topics in the structural divisions of the Company and its SCs;

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

6.7. Review and Verification of Information about the Potential Corruptive Practices

6.7.1. The Company and its SCs receive requests from the employees of the Company and its SCs, partners, counterparties and other (individuals and legal entities) about the risks and facts of corruption through an interactive channel of interaction with the applicants, the Hotline phone number, as well as through letters and e-mail.

6.7.2. The Company and its SCs shall take measures to protect the employees of the Company and its SCs who provided information through the channels of appeals to the Company and its SCs specified in Clause 6.7.1 against any form of pressure (coercion to dismiss, demotion and other violations of rights and discrimination).

6.7.3. The Company and its SCs 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 their origination.

6.8. Measures for Prevention and Combating Corruption when Interacting with Partners and Counterparties of the Company and its SCs

6.8.1. The Company and its SCs are focused on establishing and maintaining business relations with partners and counterparties that:

- support the Anti-Corruption Policy;
- ensure conduction of business relations in a conscientious and honest manner;
- protect business reputation;
- demonstrate high ethical business conduction standards;
- implement own anti-corruption measures;
- participate in collective anti-corruption initiatives.

6.8.2. Through an anti-corruption clause and anti-corruption obligations, the Company and its SCs inform the Company's partners and counterparties about acceptable standards and rules of conduct.

6.8.3. The Company and its SCs inform the partners and counterparties of the Company and its SCs:

- on acceding to the Anti-Corruption Charter of Russian business;
- on mandatory compliance with the requirements of the Anti-Corruption Procurement Standard of the Unified Procurement Standard of the Company (Procurement Regulations).

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

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

As part of the inspection of procurement participants, successful tenderers, counterparties of the Company and its SCs, as well as other third parties engaged by contractors of co-contractors/subcontractors, the following work is carried out: disclosure of the structure of owners of counterparties, including beneficiaries, including end ones (prior to individuals), the composition of their executive bodies; checking their reputation and period of activity in the market of goods, works and services, participation in corruption scandals, fraud schemes, etc.; exclusion of affiliation, risk of conflict of interest and other abuse of right or authority.

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

6.8.5. The Company and its SCs establish rules for partners and counterparties that oblige them, as well as their subcontractors/co-contractors, in the process of fulfilling their obligations, including, when they act on behalf of or for the benefit of the Company and its SCs, 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 authority (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 unlawful acts (act or omission) that have signs of corruption.

6.8.6. In the course of the contract execution by the counterparty, the Company and the Company's SCs control the provision of information about the chain of owners of the counterparty of the Company or its SCs to the ultimate beneficiary – an individual in case of changes in the structure of the counterparty's owners, about third parties engaged by the counterparty to fulfill their obligations under the contract, as well as the deadlines for fulfilling contractual obligations and the financial status of the counterparty, compliance with the “Anti-Corruption Clause”.

In case of failure to comply by the counterparty of the Company or the Company's SCs with the requirements specified in clause 6.8.6 of this Anti-Corruption Policy, the contractual relations may be terminated in the manner established by the Company and its SCs.

6.8.7. The Company and its SCs may conduct training of partners, counterparties on anti-corruption issues, especially those acting on behalf of or for the benefit of the Company and its SCs.

6.8.8. Counterparties and the Company and its SCs refuse to incentivize each other's employees in any way, including by providing monetary amounts, business gifts, free of charge performance of work (services) and in other ways not mentioned herein, placing the employee in a certain dependence and aimed at ensuring that the employee performs any actions in favor of the party incentivizing the employee (the counterparty or the Company and its SCs).

Actions of an employee carried out in favor of its incentivizing party (counterparty or Company and its SCs) shall be understood as:

- providing unjustifiable advantages compared to other contracting parties;
- provision of any guarantees, preferences;
- fast tracking existing procedures;

– other actions performed by an employee within the scope of his/her official duties, but which run counter to the principles of transparency and openness of relations between the counterparty and the Company and the Company’s SCs.

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, receiving a bribe in carrying out the main activities provided for by the Charter of the Company and the charters of its SCs, the Company and its SCs take the following measures taking into account the provisions of regulatory legal acts of the Russian Federation, clause 9 of the Anti-Corruption Charter of Russian Business, international standards, this Anti-Corruption Policy:

- analyze the business processes of the Company and its SCs in order to identify the factors of such corruption risks, develop and implement control procedures to minimize them;
- inform the employees of the Company and its SCs about the penalties imposed for corrupt practice and/or receiving a bribery from foreign officials, officials of public international organizations;
- keep records of foreign public officials and officials of public international organizations with which the Company and its SCs interact within the framework of contractual and pre-contractual relations, as well as records of employees of the Company and its SCs who participate in such transactions;
- if facts of bribery of foreign officials are revealed, inform the Investigative Committee of the Russian Federation;
- in case of international commercial transactions, if necessary, seek advice and support from diplomatic and trade missions of the Russian Federation abroad;
- inform parties concerned, as part of the Anti-Corruption Monitoring, about the measures taken in the Company and the Company's SCs aimed at preventing bribery of foreign public officials and officials of public international organizations,
- cooperate with representatives of state 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. Procedure for Interaction with State Bodies Performing Control and Supervisory Functions

6.10.1. Employees of the Company and its SCs are prohibited from transferring, offering or promising business gifts on behalf of and in the interests of the Company and its SCs, including those the cost of which is less than three thousand rubles, money, securities, other property, provide monetized services, and provide property rights, when interacting with the executive authorities of the Russian Federation performing control and monitoring functions.

6.10.2. The Company and its SCs establish the procedure for reporting to the law enforcement agencies on the facts of violation of the requirements for official behavior of state and civil servants in the implementation of control and supervisory measures in the Company and its SCs, including providing a pre-trial procedure for appealing their actions.

6.10.3. The Company and its SCs shall cooperate with law enforcement agencies in conducting inspections of the Company's activities and its SCs on issues of preventing and combating corruption.

6.10.4. Ensure compliance with the requirements of the law of the Russian Federation, instructions of the Chairman of the Government of the Russian Federation[1] and decisions of the Commission under the President of the Russian Federation on the development strategy of the fuel and energy complex[2] in the framework of ensuring transparency of the financial and economic activities of the Company and its SCs.

6.11. Cooperation with Law Enforcement Agencies in Combating Corruption

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

- inform the relevant law enforcement agencies about the revealed facts of corruption and other offenses;
- provide support in the identification and investigation of corruption acts, suppression or investigation of corruption crimes, including law enforcement intelligence, take the necessary measures to preserve and transfer documents and information containing data on corruption offenses;
- prevent unlawful interference of the Company's employees and employees of the Company's SCs with the activities of law enforcement agencies;
- refrain from any sanctions against the employees of the Company and its SCs who have informed the law enforcement agencies about facts of preparation or commission of corruption and other offenses that have become known to them during the performance of labor (official) duties.

6.12. Participation in Collective Initiatives to Prevent and Combat Corruption

6.12.1. The Company and its SCs take part in collective anti-corruption initiatives in order to implement in their activities measures to prevent and combat corruption, create conditions for public condemnation and rejection of corruption manifestations when interacting with state authorities and in corporate relations and exchange of experience:

- in carrying out activities to implement the provisions of the Anti-Corruption Charter of Russian Business in accordance with the Regulation on Conditions and Procedure for Implementation of provisions of the Anti-Corruption Charter of Russian Business;
- in use of standard anti-corruption clauses in joint agreements;
- in public refusal to interact with organizations involved in corruption crimes;
- in organizing and conducting joint training on prevention and anti-corruption issues;
- in participation of the Company's employees and employees of the Company's SCs in international and other anti-corruption activities.

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

7. Subsidiaries

The Company and its SCs, in accordance with the corporate governance system in force in the Company and its SCs, initiate the introduction of their own anti-corruption policies similar to this Anti-Corruption Policy in its SCs, as well as make reasonably

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[1] Instructions of the Government of the Russian Federation No. ВП-П13-9308 dated December 28, 2011 and No. ВП-П24-1269 dated March 5, 2012 on disclosing information on the structure of owners of counterparties, on presenting data on income, property and property obligations of management, on preventing and identifying conflicts of interest and other abuses related to positions held in the Company.

[2] The Minutes of the Commission under the President of the Russian Federation on the development strategy of the fuel and energy complex and environmental safety dated No. A-60-26-8 dd. 10.07.2013.

possible efforts to ensure that the fundamental principles and requirements of the Anti-Corruption Policy are complied with in joint ventures, companies and associations, the participatory interests and shares of which are owned by the Company and SCs of the Company.

8. Responsibility

8.1. Employees of the Company and its SCs, regardless of their position, shall bear personal responsibility for compliance with the provisions of this Anti-Corruption Policy.

8.2. The Company and its SCs shall take measures to ensure that persons guilty of corruption offenses are held accountable as established by the applicable law of the Russian Federation in the field of anti-corruption.

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

8.4. The liability for corruption and other offenses in the Company and its SCs include disciplinary, administrative and criminal liability measures in accordance with the law of the Russian Federation, as well as corporate corrective actions in accordance with local regulations of the Company and local regulations of its SCs.

9. Acceptance, Analysis Application and Revision of Anti-Corruption Policy

9.1. The Company and its SCs regularly monitor the effectiveness of the measures under this Anti-Corruption Policy through internal and/or external audits.

9.2. The Company and its SCs shall ensure the conditions under which the employees of the Company and its SCs, as well as other stakeholders, can freely indicate the shortcomings of this Anti-Corruption Policy, as well as make proposals for its improvement.

9.3. The results of fulfillment of the anti-corruption plan are presented in the annual social reporting of FGC-Rosseti, PJSC on the sustainable development of the Company and its SCs.

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

- the need to bring the provisions of this Anti-Corruption Policy in line with the Russian applicable foreign laws in the field of anti-corruption;
- changes in the organizational and staff or functional structure of the Company that have a direct impact on the implementation of this Anti-Corruption Policy;
- the need to improve measures to implement this Anti-Corruption Policy.

Appendix 1
to the Anti-Corruption Policy
of the Company and its SCs

List of regulatory legal acts of the Russian Federation based on which the Anti-Corruption Policy of the Company and its SCs has been developed

- the Civil Code of the Russian Federation;
- the Labor Code of the Russian Federation;
- the Code of the Russian Federation on Administrative Offenses;
- the Criminal Code of the Russian Federation;
- Federal Law No. 208-FZ, dated 26.12.1995 “On Joint-Stock Companies”;
- Federal Law “On Counteraction of the Laundering of the Proceeds of Crime and Financing of Terrorism” No. 115-FZ dated 07.08.2001;
- Federal Law No. 273-FZ dated 25.12.2008 “On Combating Corruption”;
- Federal Law No. 224-FZ dated 27.07.2010 “On Countering the Unlawful Use of Insider Information and Market Manipulation and on Amending Certain Legislative Acts of the Russian Federation”;
- Federal Law No. 230-FZ dated 03.12.2012 “On Monitoring of Expenditure of Persons Filling Public Office and Other Persons Against their Income”;
- Federal Law No. 79-FZ dated 07.05.2013 “On prohibition for certain categories of persons to open and have accounts (deposits), place cash and valuables in foreign banks located outside the territory of the Russian Federation, to own and (or) use foreign financial instruments”;
- Decree of the President of the Russian Federation No. 309 dd. 02.04.2013 “On measures to implement certain provisions of the Federal Law “On Combating Corruption”;
- Decree of the President of the Russian Federation No. 613 dated 08.07.2013 “Anti-corruption Issues”;
- Decrees of the President of the Russian Federation with National Anti-Corruption Plans;
- Decree of the Government of the Russian Federation No. 568 dated 05.07.2013 “On the extension to certain categories of citizens of restrictions, prohibitions and obligations established by the Federal Law “On Combating Corruption” and other federal laws aimed at combating corruption”;
- Decree of the Government of the Russian Federation No. 613 dated 22.07.2013 “On the submission by citizens applying for filling positions in organizations established to fulfill the tasks assigned to the Government of the Russian Federation and employees filling positions in these organizations, information on income, expenses, property and property-related obligation obligations, verification of the reliability and completeness of the information submitted and compliance by employees with the requirements for official behaviour”;
- Decree of the Government of the Russian Federation No. 10 dated 09.01.2014 “On the Procedure for Informing Individual Categories of Persons of Receiving a Gift in Connection with their Official Position or Performance of Official (Official) Duties, Delivery and Evaluation of a Gift, Sale (Redemption) and Crediting of Funds Received from Its Sale”;
- Decree of the Government of the Russian Federation No. 29 dated 21.01.2015 “On Approval of the Rules for Notification by the Employer of the Conclusion of a Labor or Civil Law Contract for the Performance of Work (Provision of Services) with a Person

Holding State or Municipal Service Positions, the List of which is Established by Regulatory Legal Acts of the Russian Federation";

- Development Strategy for the Electric Grid Complex of the Russian Federation approved by Order of the Government of the Russian Federation No. 511-r dated 03.04.2013;
- Methodological recommendations on the development and adoption by organizations of measures to prevent and combat corruption, developed by the Ministry of Labor and Social Protection of Russia, approved on 28.03.2014;
- Methodological recommendations on the organization of corruption risk management and internal control processes in the field of prevention and combating corruption, approved by Order of the Federal Property Management Agency No. 80 dd. 02.03.2016;
- The Corporate Governance Code approved on 13.02.2014 at a meeting of the Government of the Russian Federation, approved on 21.03.2014 by the Board of Directors of the Bank of Russia and recommended for use by joint-stock companies (hereinafter referred to as the "Corporate Governance Code");
- Anti-Corruption Charter of the Russian Business, signed by the Chamber of Commerce and Industry of the Russian Federation, the Russian Union of Industrialists and Entrepreneurs, the All-Russian Public Organization "Delovaya Rossiya" and All-Russian Public Organization "OPORA RUSSIA";
- other Russian regulatory legal acts in the field of preventing and combating corruption;
- Minutes and instructions of state authorities of the Russian Federation:
- Minutes of the Commission under the President of the Russian Federation on the development strategy of the fuel and energy complex and environmental safety dated No. A-60-26-8 dd. 10.07.2013;
- instructions of the Government of the Russian Federation No. ВП-П13-9308 dated 28.12.2011 and No. ВП-П24-1269 dated 05.03.2012 on disclosure of information on the structure of owners of counterparties, on the presentation of data on income, property and property obligations of management, on the prevention and identification of conflicts of interest and other abuses related to positions held at Rosseti, PJSC and its SCs;
- GOST R ISO 26000-2012 Guidance on Social Responsibility;
- Charter of the Company;
- Code of Corporate Ethics and Official Conduct of the Company's Employees.

Appendix 2
to the Anti-Corruption Policy
of the Company and its SCs

Terms and Definitions Used in this Anti-Corruption Policy

Anti-corruption clause	The section of contracts and agreements of the Company and its SCs, declaring a position of the Company and its SCs in the field of anti-corruption and not allowing commission of corruption and other offenses
Anti-Corruption Policy	Organizational and administrative document of the Company, which consists of a set of interconnected principles, procedures and specific measures aimed at preventing and combating corruption. The concept applies to the Company and its SCs depending on the context
Anti-Corruption obligations	Consent of a participant in procurement procedures of the Company and its SCs to comply with and adhere to 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 the attachment of supporting documents
Anti-corruption monitoring	Collection, analysis and generalization of measures implemented in the Company and the Company's SCs in order to assess their effectiveness, analyze the corruption factors and risks of their materialization; analyze and evaluate data obtained as a result of control procedures; forecast of corruption offenses and development of anti-corruption methods
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 a bribe at the direction of an official is transferred to another individual or legal entity). A foreign official shall mean any appointed or elected person holding any position in the legislative, executive, administrative or judicial body of a foreign state, and any person performing any public function for a foreign state, including for a public office or 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 a public international organization, members of parliamentary meetings of international

	organizations to which the Russian Federation is a member, persons holding judicial posts of any international court whose jurisdiction is recognized by the Russian Federation (Article 291 of the Criminal Code of the Russian Federation)
Business gift (for purposes of the Anti-Corruption Policy)	A gift that can be received by an employee of the Company and its SCs in connection with hospitality events, business trips, other official events within the limits and provisions determined by the law of the Russian Federation, as well as local regulations of the Company and its SCs
Abuse of authority	The use by a person performing managerial functions in a commercial or other organization of his/her powers contrary to the legitimate interests of this organization and in order to obtain benefits and advantages for himself/herself or other persons or causing harm to other persons, if this act entailed significant harm to the rights and legitimate interests of individuals or organizations or the interests of the company or state protected by law. A person performing managerial functions in a profit-making or other organization, as well as in a non-profit organization, not being a state body, a local government body, a state or municipal institution shall be recognized as a person, acting as a sole executive body, member of the board of directors or other collegial executive body, as well as a person who constantly, temporarily or by special authority performs organizational and administrative 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 dd. October 31, 2003, a “foreign public official” is defined as any appointed or elected person holding any position in the legislative, executive, administrative or judicial body of a foreign state, and any person performing any public function for a foreign state, including for a public office or state enterprise.
Commercial bribery	Illegal transfer to a person performing managerial functions in a commercial or other organization of money, securities, other property, as well as illegal provision of property services to it, provision of other property rights (including cases, when, at the direction of such a person, property is transferred, or property services are rendered, or property rights are granted to another individual or legal entity) for

	committing actions (omission to act) for the benefit of the person giving a bribe or other persons, if these actions (omission to act) are a part of the official powers of such a person or if, by virtue of its official position, he/she can contribute to these actions (inaction) (Article 204 of the Criminal Code of the Russian Federation)
Compliance	Compliance of the organization's activities as per the requirements imposed on it by Russian and foreign laws, local regulatory acts, other mandatory regulatory documents
Counterparty	Any Russian or foreign legal entity or individual with whom the Company or Subsidiaries enters into contractual relations with the establishment of different scope of rights and obligations (except for employment relations), and which are not united by a common purpose
Conflict of Interest	Personal interest (direct or indirect) of a person holding a position implying taking measures to prevent and resolve conflicts of interest, having an impact or a potential impact on proper, unbiased and impartial performance of his/her official duties (exercise of authority)
Corruption offense	Wrongful guilty act (action or omission) with signs of corruption, for which criminal, administrative, civil and disciplinary liability is provided for in accordance with the applicable law of the Russian Federation
Corruption risk	Possibility of a corruption offense committed by an employee of the Company and its SCs
Corruption	a) abuse of official position, giving a bribe, receiving a bribe, abuse of authority, commercial bribery or other illegal use by an individual of his/her official position contrary to the legitimate interests of the company and the State to obtain a benefit in the form of monetary funds, values, 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) committing the acts specified in sub-clause “a” of this clause on behalf of or for the benefit of a legal entity
Personal interest	The possibility of receiving income in the form of monetary funds, other property, including property rights, monetized services, deliverables or any benefits (advantages) by the employee of the Company and/or its SCs and (or) persons closely

	related or affined to it (parents, spouses, children, siblings, as well as siblings, parents, children of spouses and spouses of children), persons or organizations with whom the employee of the Company and/or its SCs and (or) persons who are closely related to him/her are associated by virtue of property, corporate or other close connection
Persons closely related or affined to a manager/employee	Parents, spouses, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and spouses of children
Material benefit	Benefit in cash or in kind, which can be estimated and determined as income in accordance with the tax law of the Russian Federation
Methodological recommendations of the Ministry of Labor	Methodological recommendations on the development and adoption by organizations of measures to prevent and combat corruption, developed by the Ministry of Labor and Social Protection of the Russian Federation, approved on 28.03.2014
Illegal remuneration on behalf of a legal entity	Unlawful transfer, offer or promise on behalf of or for the benefit of a legal person or for the benefit of a related legal person to an official, a person performing managerial functions in a commercial or other organization, a foreign official or an official of a public international organization of money, securities or other property, provision of monetized services to him/her or 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, monetized services are provided or property rights are provided to another individual or legal entity) as a consideration for the performance for the benefit of this legal entity or for the benefit of a related legal entity by an official, a person performing managerial functions in a commercial or other organization, a foreign official or an official of a public international organization of action (omission to act) related to his/her official position (Article 19.28 of the Code of Administrative Offenses). Officials are persons who permanently, temporarily or by special authority perform the functions of a representative of the authorities or perform organizational and administrative, administrative and economic functions in public institutions, local self-government authorities, state and municipal institutions, state extra-budgetary funds, state

	corporations, public companies, public not-for-profit organization, state and municipal unitary enterprises, business entities, in the highest management 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 votes or in which the Russian Federation, a constituent entity of the Russian Federation or a municipality 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 of participation of the Russian Federation, constituent entities of the Russian Federation or municipalities in the management bodies of such joint-stock companies is applied (“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 employment or engagement to perform work or provide services of a government or municipal employee or a former government or municipal employee	Engagement by the employer or the customer of works (services) to perform work on the terms of an employment contract or to perform works or provide services on the terms of a civil contract of a state or municipal employee holding a position included in the list established by regulatory legal acts, or a former state or municipal employee holding such 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 which the Company or its SCs enters into contractual relations aimed at achieving a joint goal
Receiving 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 monetized services to him/her, provision of other property rights (including cases when a bribe at the instructions of an official is transferred to another individual or legal entity) as a consideration for committing actions (omission to act) in favor of the bribe giver or persons represented by him/her, if these actions (omission to act) falls within the official's official powers or such official, by virtue of the official position, may facilitate such actions (omission to act), as well as for general

	patronage or connivance while performing official duties (Article 290 of the Criminal Code of the Russian Federation)
Mediation of bribery	Direct transfer of a bribe on behalf of the bribe giver or bribe recipient or other assistance to the bribe giver and (or) the bribe recipient in achieving or fulfilling 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)
Pre-conflict situation	Situation in which an employee of the Company and/or its SCs, as well as the Customer/Procurement Organizer or their representatives, when performing their official or professional activities, have a personal interest that would lead to a conflict of interest
Provocation of bribes, commercial bribery or bribery in the field of procurement of goods, works, services for state or municipal needs	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 1 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 delivered goods, works performed or services rendered, or another authorized person representing the interests of the customer in the field of procurement of goods, works, services to meet state or municipal needs) without his/her consent of monetary funds, securities, other property or the provision of monetized services to him/her, the provision of other property rights in order to deliberately create evidence of a crime or attempted extortion (Article 304 of the Criminal Code of the Russian Federation)
Preventing corruption	Activities of the organization aimed at introducing elements of the corporate culture, organizational structure, rules and procedures regulated by internal local acts ensuring the prevention of corruption offenses
Prevention of corruption	Activities of the organization to identify and eliminate the causes of corruption
Anti-corruption	Activities of the Company and its SCs, as well as employees of the Company and its SCs within their authorities to prevent corruption, identify, prevent, suppress, disclose and internally investigate corruption offenses (combating corruption),

	minimize and/or eliminate the consequences of corruption offenses.
Employee of the Company and employee of its SC	Employee with whom the Company or the Company's SC have entered into a labor or civil contract.
Structural division responsible for prevention of corruption offenses, anti-corruption, compliance control	The Department of Security and Anti-Corruption Policy of the Company, the Department of Internal Control and Risk Management of the Company within the competencies, structural divisions of the Company's SCs, which, according to the organizational structure of the Company's SCs, perform functions for the prevention of corruption offenses, anti-corruption, compliance control.
Labor dynasty	A group of employees of the Company's production personnel who are closely related or affined to each other (parents, spouses, children, siblings, as well as siblings, parents, children of spouses and spouses of children) of at least three people representing at least two generations, characterized by the transfer of professional skills from the older generation to the younger generation
Bidder	A bidder is any legal entity or several legal entities acting on behalf of one bidder, regardless of the organizational and legal form, form of ownership, location and place of origin of capital, except for a legal entity that is a foreign agent in accordance with Federal Law No. 255-FZ dated July 14, 2022 “On Control Over the Activities of Persons under Foreign Influence”, or any individual or several individuals, acting on behalf of one bidder, including an individual entrepreneur or several individual entrepreneurs, acting on behalf of one bidder, except for an individual, being a foreign agent in accordance with Federal Law No. 255-FZ dated July 14, 2022 “On Control Over the Activities of Persons under Foreign Influence”

Appendix 3
to the Anti-Corruption Policy
of the Company and its SCs

Consolidated list of anti-corruption measures implemented in the Company and its SCs **Anti-Corruption Policy Implementation Mechanism in the Company and its SC/Anti-Corruption Measures**
1. Determination of the functions and tasks of departments 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 divisions or officials responsible for preventing corruption offenses, combating corruption, compliance control).
1.2. Definition of functions of structural divisions responsible for prevention of corruption offenses, anti-corruption, compliance control.
2. Organization of the Process of Corruption Risk Management and Internal Control in the Company and its SCs
2.1. Analysis of business processes, determination of the control environment, identification, description, assessment of corruption risks (maintaining a register (list), passports, changing the map of corruption risks, determining the owners of corruption risks, a list of positions with high corruption risk).
2.2. Description of corruption risk factors 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 filing of conflict of interest declarations.
2.5. Assessment of efficiency and control of existing measures to minimize corruption risks of the Company and its SCs. Monitoring of risk factors.
2.6. Development of new and improvement of existing measures to minimize corruption risks.
2.7. Annual updating of corruption risk passports.
2.8. Verification of compliance with the requirements of the Anti-Corruption Policy in the Company and its SCs.
2.9. Monitoring and control of the economic feasibility of the Company's and SC's expenses in areas with high corruption risk (exchange of business gifts, hospitality expenses, charitable donations, remuneration to external consultants, etc.), including through the mechanism for checking the validity of the calculation of the initial (maximum) purchase price.
3. Monitoring the Functioning of the Risk Management and Internal Control System in the Field of Prevention Corruption and Anti-Corruption and Assessing their Effectiveness
3.1. Self-assessment of the effectiveness of corporate and process controls in the field of combating and preventing corruption.
3.2. Internal independent assessment of the internal control and risk management system by the internal audit division (verification of the reliability of procedures for combating illegal actions, abuses and corruption).
3.3. Conducting an external independent assessment of the effectiveness of the risk management and internal control system (hereinafter referred to as RM&ICS) in the field of combating and

preventing corruption, with the submission of the results of the audit to the Company's Board of Directors and boards of directors of the Company's SCs.
3.4. Submission of reports on the results of anti-corruption monitoring to the Board of Directors of the Company (with preliminary consideration by the Audit Committee under the Board of Directors) and boards of directors of the Company's SCs.
4. Prevention and Resolution of Conflicts of Interest
4.1. Development and implementation of provisions on conflicts of interest (procedure for informing employees of the Company and its SCs about the occurrence of conflicts of interest and resolution of the identified conflict of interest, consolidation of duties and responsibilities of employees, typical situations of pre-conflict/conflict of interest, etc.), forms of declarations of conflict of interest.
4.2. Updating the procedure for working collegial bodies (commissions) to consider issues related to the resolution of conflicts of interest (by the Corporate Ethics Compliance and Conflict of Interest Resolution Commission in the Company and its SCs).
4.3. Verifying the conflict of interests of employees with the participation of structural divisions of the Company and SCs responsible for preventing corruption offenses, anti-corruption, compliance control.
4.4. Informing employees of adopted local regulations (hereinafter referred to as LR) to resolve conflicts of interest and obligations to comply with the requirements contained therein.
4.5. Organization and arrangement of work to resolve conflicts of interest.
4.6. Organization of declaration of conflicts of interest by candidates for employment in the Company and its SCs, as well as for transfer to senior positions.
4.7. Organization of annual declaration of conflicts of interest by employees of the Company and its SCs.
4.8. Analysis of information obtained during declaration of conflict of interest by employees of the Company and its SCs.
4.9. Provision of a report on declaration of conflicts of interest by employees of the Company and its SCs to the Central Corporate Ethics Compliance and Conflict of Interest Resolution Commission at Rosseti, PJSC.
4.10. Organization of annual declaration of information on income, property and property obligations of persons defined by the Company's LR and LR of the Company's SC in accordance with regulatory legal acts of the Russian Federation.
4.11. Development of measures to resolve the pre-conflict situation, resolve the conflict of interests of a manager or employee (including revision or change of job duties and labor functions, suspension from making decisions, 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 statutory liability measures for 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 of Standards and Procedures Aimed at Ensuring Fair Work in the Activities of the Company and its SCs
5.1. Development (together with the participation of public associations) and implementation of a set of organizational, explanatory and other measures for observance by the Company's employees and employees of the Company's SCs of 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. The prohibition of recruitment of closely related or affined persons, if related to the subordination or control of one of them by the other.
5.4. Development and updating of rules governing the exchange of business gifts and signs of business hospitality, charity and sponsorship.
5.5. Conclusion of agreements on compliance with Anti-Corruption Policy requirements with the Company's employees and subsidiaries.
5.6. Participation in the verification of candidates for filling positions in the Company and its SCs in order to prevent corruption, exclude conflicts of interest.
5.7. Taking measures to prevent misuse of insider information and market manipulation.
5.8. Development and implementation of anti-corruption provisions in employment, civil law agreements with employees of the Company and its SCs, contracts/agreements with counterparties and partners.
6. Review and Verification of Information about the Potential Corruptive Practices and Other Abuses
6.1. Control over the implementation of the LRA on the procedure for considering reports of possible facts of corruption in the Company and its SCs (the procedure for accepting, considering and resolving appeals, the deadlines for consideration, the procedure for interacting with structural divisions, the introduction of a procedure for informing by the employer's staff about cases of incitement to commit corruption violations, etc.).
6.2. Monitoring the continuous operation of available information channels, feedback mechanisms, helpline, hotline, etc. Control over the placement and updating of information on employee appeal channels in production departments (PDs), Distribution Zone (PDZ) of the Company.
6.3. Control over the organization and arrangement of work on consideration of appeals. Participation of responsible employees of the Company in consideration of appeals received by the Company.
6.4. Analysis and monitoring of compliance with prohibitions, restrictions and requirements established in order to combat corruption, including those related to receiving business gifts by certain categories of persons, performing other paid work, the obligation to notify about appeals on incitement to commit corruption violations.
6.5. Introduction of procedures for the protection of employees who reported corruption offenses.
7. Legal Education and Laying the Groundworks of Law-abiding Behavior of Employees, Counseling and Training of Employees
7.1. Development and publication of methodological and explanatory materials on anti-corruption standards of conduct.
7.2. Posting of information on measures to implement the Anti-Corruption Policy of the Company and its SCs on the official corporate websites of the Company and its SCs, in “Korporativnaya Gazeta”, mass media and other sources of information.
7.3. Ensuring, when interacting with the media, the dissemination of positive experience in countering attempts of corruption pressure by employees and the Company.
7.4. Ensuring annual professional development of employees, whose duties include participation in combating corruption, according to the two-level educational program (basic – for first-time students and advanced – for previously trained students).

7.5. Conducting training and educational activities on prevention and anti-corruption issues (training sessions, seminars, conferences, forums, round tables, etc.) aimed at informing the employees of the Company and the Company's SCs about the requirements of the law of the Russian Federation, applicable international anti-corruption legislation, and developing anti-corruption consciousness of employees.
7.6. Work on development of negative attitude towards corruption among the Company's employees and employees of its SCs.
7.7. Organization of individual consulting of the Company's employees and employees of the Company's SCs on application (compliance) of anti-corruption standards and procedures.
7.8. Ensuring, in cooperation with educational and scientific organizations, regular public lectures on anti-corruption topics in the Company's divisions and its SCs.
8. Taking Measures to Prevent Corruption when Interacting with Partners and Counterparties
8.1. Control over special procedures for verifying counterparties in order to reduce the risk of involvement of the Company's employees and employees of its SCs in corruption activities and other unfair practices (improvement of a unified automated system for analyzing and collecting information about the beneficiaries of counterparties (AS “ASIB”), which provides for checking the level of trustworthiness and financial stability of counterparties (absence of unscrupulous suppliers in the register, presence of a negative information background, etc.).
8.2. Control over the implementation of a single mechanism of anti-corruption control of procurement activities in the Company and its SCs (including the Anti-Corruption Procurement Standard).
8.3. Updating the LRA on the organization of work on disclosure of information on the chain of owners of procurement participants and counterparties of the Company and its SCs.
8.4. Distribution among counterparties and partners of programs, policies, standards of behavior, procedures and rules aimed at preventing and combating corruption that are applied in the Company and the Company's SCs (anti-corruption obligations, anti-corruption standard, anti-corruption clause, etc.).
8.5. Informing the public about the degree of implementation and successes in the implementation of anti-corruption measures (posting the relevant information on the official websites of the Company and its SCs, in the media and other sources).
9. Interaction with State Bodies Performing Control and Supervisory Functions, Cooperation with Law Enforcement Agencies in the Field of Anti-corruption
DO9.1. Development and approval of the LRA on the procedure for interaction of the Company with control, supervisory and law enforcement agencies.
9.2. Interaction with federal state bodies on the practical application of the provisions of the law in the field of prevention and combating corruption, improvement of the regulatory legal framework, including the development of proposals for amending the current regulatory legal acts of the Russian Federation in the field of prevention and combating corruption, participation in working (expert) groups under the General Prosecutor's Office of the Russian Federation, Federal Financial Monitoring Service, CCI of the Russian Federation, etc.
9.3. Assistance in the detection and investigation by law enforcement agencies of corruption offenses.
9.4. Assistance in conducting inspections and non-interference in the legitimate activities of inspectors, informing them of cases of corruption offenses.

10. Participation in Collective Initiatives to Prevent and Combat Corruption
10.1. Implementation of the Provisions of the Anti-Corruption Charter of Russian Business:
10.1.1. Organization and arrangement of work on interaction with representatives of the Russian business community: The Chamber of Commerce and Industry of the Russian Federation, all-Russian public organizations "Russian Union of Industrialists and Entrepreneurs", "Delovaya Rossiya", "OPORA RUSSIA" and other participants of the Charter (participation in working groups, joint training, etc.).
10.1.2. Carrying out measures aimed at preventing and combating corruption: - ensuring compliance with the requirements for the Company as a member of the Anti-Corruption Charter of Russian Business; - participation in the work of the interdepartmental working group of the Ministry of Labor and Social Protection of the Russian Federation on compliance by the government agencies and organizations with the requirements of the law 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. Posting on corporate websites of a public address of the head of the Company to employees, counterparties, partners of organizations about the rejection of corruption and bribery.
10.2.3. Public refusal to cooperate with organizations (persons) involved in corruption crimes.
10.2.4. Participation of the Company's specialists and specialists of its SCs in international and other anti-corruption activities.
11. Countering Bribery of Foreign Public Officials and Officials of Public International Organizations
11.1. Development and approval of the LRA on measures to counter bribery of public foreign officials (procedure for informing employees about the facts of bribery of public foreign 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, in activities of the Company and its SCs.
11.3. Monitoring the effectiveness of measures taken to counter bribery of foreign public officials and officials of public international organizations.
12. Adoption, Analysis and Revision of the Anti-Corruption Policy
12.1. Monitoring of international standards, anti-corruption law of the Russian Federation, the Company's LRA and LRA of the Company's SCs in the field of preventing and combating corruption.
12.2. Evaluation of the effectiveness of implementation of the Anti-Corruption Policy.
12.3. Revision and amendment of the Anti-Corruption Policy.