

Appendix 1

Approved
by the Board of Directors
of PJSC “Rosseti Lenenergo”
of July 24, 2023
(Minutes No. 7 of July 27, 2023)

PUBLIC JOINT STOCK COMPANY “ROSSETI LENENERGO”

CORPORATE POLICY

PK-12.04-003-2023

Anti-Corruption Policy
PJSC “Rosseti Lenenergo”
(Rev. 1)

Saint Petersburg

2023

Introduction

Anti-Corruption Policy of PJSC “Rosseti Lenenergo” was developed basing on the Anti-Corruption Policy of PJSC “Rosseti” and its Subsidiaries as approved by the Board of Directors of Public Joint Stock Company “Federal Grid Company – Rosseti” (hereinafter, PJSC “Rosseti”) (Extract of Minutes No. 620/2 of Meeting of the Board of Directors of PJSC “Rosseti”, of June 07, 2020).

Preparation and putting into effect

1. DEVELOPED by PJSC “Rosseti Lenenergo”.
2. APPROVED under resolution of the Board of Directors of PJSC “Rosseti Lenenergo” of July 24, 2023 (Minutes No. 7 of July 27, 2023).
3. PUT INTO EFFECT by order No. ____ of _____ ____, ____ of PJSC “Rosseti Lenenergo”.

Contents

1.	General Provisions	4
2.	Terms and definitions	4
3.	Anti-Corruption Policy principles, goals, and objectives	4
4.	Key corruption prevention practices at the Company and the Subsidiaries	6
5.	Persons covered by the Anti-Corruption Policy and their general duties.....	6
6.	Practices and tools	7
7.	Subsidiaries.....	Ошибка! Закладка не определена.
8.	Liability.....	16
9.	Adoption, implementation analysis, and revision of the Anti-Corruption Policy	16
	Appendix 1	17
	Appendix 2.....	19
	Appendix 3.....	26

1. General Provisions

1.1. This Anti-Corruption Policy (the “Anti-Corruption Policy”) is the single basic document of PJSC “Rosseti Lenenergo” setting out the goals, objectives, principles and activities to prevent and combat corruption in PJSC “Rosseti Lenenergo” (the “Company”) and its Subsidiaries (the “Subsidiaries”).

1.2. In accordance with Article 13.3 of the Anti-Corruption Law (Federal Law No. 273-FZ of December 25, 2008) (the “Anti-Corruption Law”), this Anti-Corruption Policy sets out corruption prevention practices of PJSC “Rosseti Lenenergo” and the Subsidiaries with respect to appointing units and officers responsible for preventing corruption and other offenses; procedures for cooperation with law enforcement authorities; practices for developing and implementing integrity standards and procedures; adopting the conduct (ethics) code, preventing or resolving conflicts of interest, and preventing unofficial reporting and the use of false documents.

1.3. The Company and the Subsidiaries actively introduce integrity standards and procedures.

1.4. The Company and the Subsidiaries follow Anti-corruption standards that promote open, responsible and honest business as authorized by the Articles of Association of the Company and the Subsidiaries and seek to minimize corrupt practices in the electric grid sector, which affect consumer trust and business reputation of the Company and the Subsidiaries.

1.5. The list of Russian legal regulations underlying the Company's Anti-Corruption Policy is attached as Appendix 1, which is an integral part of this Anti-Corruption Policy.

1.6. The Company ensures that its anti-corruption activities are public, publishes on its website anti-corruption documents and information, including the Code of Ethics and Business Conduct of Employees of PJSC “Lenenergo” (the “Code”) and the Anti-Corruption Policy.

2. Terms and definitions

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

2.2. If there is any inconsistency between an anti-corruption regulation of the Russian Federation, as amended, and the definition of any term or other provision of this Anti-Corruption Policy, the applicable definition in respective regulation of the Russian Federation shall prevail.

3. Anti-Corruption Policy principles, goals, and objectives

3.1. Anti-Corruption Policy principles:

- Compliance of the Anti-Corruption Policy with the applicable anti-corruption law and generally accepted norms;
- Respect for legal rights and interests of stakeholders and employees of the Company and the Subsidiaries, protection of business reputation of the Company and the Subsidiaries, partners, stakeholders, and other persons; observance of commercial secrecy in implementing anti-corruption activities;
- Tone-at-the-top approach by the management to fostering a culture of intolerance to corruption and creating an internal framework for preventing and combating corruption;
- Adoption of anti-corruption risk management and internal control processes;
- Employee involvement: awareness of the Company’s and the Subsidiaries’ employees about the provisions of Anti-Corruption Laws and their active engagement in creating and implementing Anti-corruption standards and procedures;
- Adequacy of Anti-corruption procedures given the extent of potential damage in the event of corruption risks;
- Effectiveness of Anti-corruption procedures, which should provide for anti-corruption measures that are easy to implement and yield meaningful results;

- Accountability and non-discriminatory liability for employees of the Company and the Subsidiaries, regardless of their position, length of service, or other conditions, should they commit corruption offenses;
- Transparency in conducting the businesses authorized by the Articles of Association of the Company and the Subsidiaries: informing partners, counterparties, and the public of the Anti-corruption practices adopted by the Company and the Subsidiaries;
- Continuous supervision and regular monitoring of the effectiveness of adopted Anti-corruption standards and procedures.

3.2. Anti-Corruption Policy goals

This Anti-Corruption Policy aims to ensure a uniform approach to implementing the requirements of Article 13.3. of the Anti-Corruption Law and other anti-corruption regulations of the Russian Federation, develop and adopt corruption prevention practices: identify and eliminate factors causing corruption (preventing corruption); detect, prevent, and suppress corruption and other offenses; minimize and/or eliminate the consequences of corruption and other offenses, minimize the risks of the Company and the Subsidiaries being held liable, including under Article 19.28 of the Russian Code of Administrative Offences (the “Code of Administrative Offences”), employees of the Company and the Subsidiaries under Article 290 (Taking a Bribe) of the Russian Criminal Code (the “Criminal Code”), Article 291 (Bribing) of the Criminal Code, and Article 291.1 (Mediation in Bribery) of the Russian Criminal Code, or other liability for corruption offenses prescribed by the Russian law.

This Anti-Corruption Policy aims to implement the requirements of the Corporate Governance Code related to identifying measures required to establish elements of corporate culture, an organizational structure, and rules and procedures to prevent corruption, assessing the reliability of procedures for combating illegal actions, abuse, and corruption, and checking the Company’s and the Subsidiaries’ employee compliance with the Russian law and local regulations of the Company and the Subsidiaries in respect of confidential information and corruption combating, and compliance with the Code.

3.3. Anti-Corruption Policy Objectives:

3.3.1. Identify key areas for implementing the requirements of Article 13.3 of the Anti-Corruption Law and other anti-corruption regulations of the Russian Federation;

3.3.2. Develop and adopt measures to implement the National Anti-Corruption Plan approved by respective relevant Executive Order of the President of the Russian Federation, Minutes No. A-60-26-8 of the Commission for the Development Strategy of the Energy Sector and Environmental Security under the President of the Russian Federation, of July 10, 2013; Instructions of the Government of the Russian Federation No. VP-P13-9308 of December 28, 2011 and No. VP-P24-1269 of March 5, 2012, other instructions of the Russian Government and the shareholder represented by the Russian Federation, and the Russian Ministry of Labor Anti-Corruption Guidelines;

3.3.3. Develop and implement corruption prevention and combating measures, including an anti-corruption measures plan;

3.3.4. Identify, assess and describe corruption risks, develop measures to minimize corruption risks, and monitor the effectiveness of such measures;

3.3.5. Ensure that employees of the Company and the Subsidiaries are responsible for their actions and behavior;

3.3.6. Ensure that members of governance and supervision bodies, employees, partners and counterparties of the Company and the Subsidiaries clearly understand that the Company and the Subsidiaries have zero tolerance towards corruption in any form;

3.3.7. Minimize the risks of involvement of employees of the Company and the Subsidiaries in activities related to corruption offenses.

4. Key corruption prevention practices at the Company and the Subsidiaries

- 4.1. Set out roles and tasks of structural units of the Company and the Subsidiaries responsible for preventing and combating corruption and anti-corruption compliance;
- 4.2. Develop and implement a set of integrity standards and procedures;
- 4.3. Make employees of the Company and the Subsidiaries aware of the Code of Corporate Ethics and Business Conduct of the Company and the Subsidiaries;
- 4.4. Identify and assess corruption risks in accordance with the local regulations of the Company and the Subsidiaries;
- 4.5. Develop, jointly with the corruption risk owners, procedures to minimize the identified corruption risks;
- 4.6. Identify and manage conflicts of interest;
- 4.7. Develop control procedures to minimize the risk of the Company or the Subsidiaries being held liable under Article 19.28 of the Code of Administrative Offences;
- 4.8. Interact with law-enforcement authorities in combating corruption, report the identified offenses, and assist with audits;
- 4.9. Set up control procedures to prevent unofficial reporting and the use of false documents.

5. Persons covered by the Anti-Corruption Policy and their general duties

5.1. This Anti-Corruption Policy covers governance and supervision bodies and employees of the Company and the Subsidiaries, regardless of their position or functions, as well as partners and counterparties of the Company and the Subsidiaries, and other persons by virtue of mutual obligations between them and the Company or the Subsidiaries, including Anti-corruption commitments and other Anti-corruption agreements.

5.2. General duties of the Company's and the Subsidiaries' governance and supervision bodies and employees:

5.2.1. The Company's and the Subsidiaries' governance and supervision bodies and employees shall:

- refrain from behavior that could be interpreted by others as willingness to give or receive a bribe, or promise or offer to mediate in bribery, including on behalf or for the benefit of the Company or the Subsidiaries;
- refrain from receiving business gifts from partners or counterparties of the Company or the Subsidiaries, including giving business gifts to other employees of the Company or the Subsidiaries, other than business gifts received by an employee in connection with hospitality events, business trips, other formal events or in other events set out in the federal laws or regulations that describe an employee's specific legal status or employment.
- report to the Company's or the Affiliate's unit responsible for preventing corruption offenses, combating corruption and anti-corruption compliance about any inducements to commit corruption offenses;
- report to the Company's or the Affiliate's unit responsible for preventing corruption offenses, combating corruption and anti-corruption compliance about any existing or potential conflict of interest or the risk of conflict of interest, any incidents of corruption offenses committed by other employees or partners or counterparties of the Company or the Subsidiaries, or other persons.

5.3. Partners and counterparties of the Company and the Subsidiaries are aware that they shall:

- comply with the Anti-Corruption Clause, other anti-corruption commitments and agreements contained in the existing agreements between with the Company or the Subsidiaries and the partners, counterparties of the Company or the Subsidiaries;
- comply with the Anti-Corruption Procurement Standard annexed to the Uniform

Procurement Standard of PJSC “Rosseti” (Procurement Regulations), provide any information and documents requested by the Company and the Subsidiaries (details of the entire chain of ownership including the individual ultimate beneficiary, consent to the processing of their personal data, and other information);

- refrain from committing and/or participating in corruption offenses, refrain from behavior that could be interpreted as willingness to give or receive a bribe or be a mediator in bribery.

5.4. The Company and the Subsidiaries recommend that their partners and counterparties, if induced to give or receive a bribe or be a mediator in bribery, notify the Company or the Subsidiaries.

5.5. The Company and the Subsidiaries recommend that their partners and counterparties refrain from giving business gifts to the governance bodies or employees of the Company and the Subsidiaries.

6. Practices and tools

6.1. Functions and tasks assigned to units and officials responsible for preventing corruption offenses and combating corruption

6.1.1. The Board of Directors of the Company and the boards of directors of the Subsidiaries, the Company’s executive bodies acting under the Company’s Articles of Association, and the sole executive bodies of the Subsidiaries acting under the relevant articles of association of the Affiliate, the Company’s Deputy Director General for Security, the Company’s structural unit and the Subsidiaries’ units responsible for preventing corruption offenses, combating corruption, and compliance, shall cause the employees of the Company and the Subsidiaries to comply with the fundamental principles, objectives and requirements of this Anti-Corruption Policy at the Company and the Subsidiaries and monitor the effectiveness of the Anti-Corruption Policy measures.

6.1.2. The Board of Directors of the Company and the boards of directors of the Subsidiaries shall:

- determine the key strategic areas of the Anti-Corruption Policy. The Board of Directors shall approve the Company’s Anti-Corruption Policy, and the Subsidiaries shall adhere to the Company’s Anti-Corruption Policy
- follow up the results of implementing and enforcing the Anti-Corruption Policy;
- exercise overall control over their implementation, implementation practices, and operational efficiency of the Anti-Corruption Policy measures.

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

- be responsible for organizing all activities aimed at implementing the principles and requirements of the Anti-Corruption Policy, including by appointing persons responsible for implementing the Anti-Corruption Policy, preventing corruption offenses, combating corruption, and compliance at the Company and the Subsidiaries;
- duly authorize the Company’s structural unit and the Subsidiaries’ units responsible for preventing corruption offenses, combating corruption, and compliance, to implement anti-corruption activities at the Company and the Subsidiaries, including with respect to the Company’s and the Subsidiaries’ executive officers, and allocate the necessary human and technical resources;
- approve the corruption risk register, the list of corruption risk owners, review corruption risk minimization reports;
- ensure that an annual report on compliance with this Anti-Corruption Policy and the Subsidiaries’ anti-corruption policies by the Company and the Subsidiaries is reviewed by the

Board of Directors of the Company and the boards of directors of the Subsidiaries (the Anti-Corruption Monitoring report).

6.1.4. Subject to the Strategy for the Development of the Electric Grid Sector of the Russian Federation, the Company's unit responsible for preventing corruption offenses, combating corruption, and compliance, shall coordinate and manage the corruption preventing and combating activities at the Company and the Subsidiaries.

6.1.5. the Company's unit responsible for preventing corruption offenses, combating corruption, and compliance, shall hold annual workshops on improving ROSSETI Group's Anti-corruption efforts to be with the heads of the Subsidiaries' units responsible for preventing corruption offenses, combating corruption, and compliance.

6.1.6. The units of the Company and the Subsidiaries responsible for preventing corruption offenses, combating corruption, and compliance, shall:

- develop and implement at the Company and the Subsidiaries common practices of implementing the Anti-Corruption Policy to detect, prevent, and suppress corruption offenses, and minimize corruption and reputation risks;
- take measures to implement the principles and requirements of the Anti-Corruption Policy;
- develop and review the anti-corruption measures plan;
- ensure anti-corruption compliance of the activities of the Company and the Subsidiaries;
- provide supervisory control to identify corruption and other offenses;
- apply anti-corruption controls in the procurement activities of the Company and the Subsidiaries;
- organize the accepting and reviewing of reports of alleged cases of corruption and fraud from employees and counterparties of the Company and the Subsidiaries, or other individuals or legal entities;
- organize the activities at the Company and the Subsidiaries to manage conflicts of interest and internal ethical requirements, including:
 - organize the procedure for completing and reviewing conflict of interest declarations;
 - organize verification of information on the property, income and property-related liabilities of the persons defined by the local information disclosure regulations of the Company and the Subsidiaries, their spouses and minor children, for reliability, signs of affiliation, conflict of interest, pre-conflict situations and other abuses associated with positions held at the Company;
 - organize identity checks of employees engaged by the Company and the Subsidiaries for reliability of the documents submitted when hiring and the availability of compromising information;
 - arrange for training on preventing and combating corruption, and individual employee consultations;
 - organize outreach and awareness raising efforts more effectively to foster zero tolerance in society toward corrupt offenses;
 - assist authorized representatives of supervisory and law enforcement authorities in inspecting the efforts undertaken by the Company and the Subsidiaries to prevent and combat corruption;
 - assist authorized representatives of Russian law enforcement authorities in suppressing or investigating corruption offenses, including law enforcement intelligence;
 - prepare reports on compliance with anti-corruption policies and anti-corruption measures plans (Anti-Corruption Monitoring);

- develop and adopt anti-corruption standards;
- provide methodological assistance in the implementation of measures to combat and prevent corruption and raise legal awareness among employees;
- cause the structural units of the Company and the Subsidiaries to share experience so as to increase the effectiveness of measures to combat and prevent corruption and raise legal education among employees;
- coordinate the activities of structural units in implementing the Anti-Corruption Policy;
- participate in conducting summits, applied research workshops, and conferences of the national and international level on combating and eliminating the causes of corruption;
- cooperate with governmental and local government authorities, research and educational organizations and institutions on combating and eliminating the causes of corruption;
- organize and monitor Russian and applicable foreign and international anti-corruption laws and track amendments thereto and relevant court practice;
- conduct scheduled and unscheduled audits of compliance with the principles of this Anti-Corruption Policy and prepare reports on the results of such audits;
- develop documents related to elimination of the causes and prevention of corruption and initiate the updating of documents due to amendments in the Anti-Corruption Laws of the Russian Federation.

6.1.7. The Central Commission on Corporate Ethics Compliance and Conflict of Interest Resolution (a collective body of PJSC “Rosseti”) shall:

- review matters related to the resolution of pre-conflicts of interest in PJSC “Rosseti” and compliance with the Anti-Corruption Policy, the Code of Corporate Ethics, and the Corporate Governance Code PJSC “Rosseti”;
- review matters related to corporate ethics compliance and conflict of interest resolution among employees of the Subsidiaries of PJSC “Rosseti”.

6.1.8. The Central Commission on Corporate Ethics Compliance and Conflict of Interest Resolution as a collective body of the Company shall:

- review matters related to the resolution of pre-conflicts of interest at the Company and the Subsidiaries and compliance with this Anti-Corruption Policy, the Codes of Corporate Ethics, and the Corporate Governance Codes of the Company and the Subsidiaries.

6.2. **Corruption risk management process** The corruption risk management process is governed by the Company’s local risk management and internal control regulations.

6.2.2. The Company and the Subsidiaries maintain lists of positions with a high corruption risk, owners of corruption risks, corruption risk lists (registers), corruption risk descriptions and maps, corruption risk management control matrices and control procedures for the Company's business processes.

6.3. **Prevention and resolution of conflicts of interest**

In order to manage the conflict of interest risk and the influence of private interests of employees on their job functions and business decisions, the Company and the Subsidiaries take efforts to identify, prevent, and resolve conflicts of interest through:

6.3.1. Developing and adopting local regulations governing the procedures to identify and resolve pre-conflict of interest situations that employees of the Company and the Subsidiaries may have while exercising their functions and job duties.

6.3.2. Informing all employees of the Company and the Subsidiaries on the adoption of such conflict of interest local regulations by the Company and the Subsidiaries.

6.3.3. Follow the principles listed below in identifying and managing conflicts of interest:

- Mandatory disclosure of actual or potential conflicts of interest;

- Individual review and assessment of corruption and reputation risk factors upon identifying and resolving each conflict of interest;
 - Ensuring the confidentiality of the processes related to the disclosure of information on, and resolution of, conflicts of interest;
 - Observing the balance of interests of the Company and the Subsidiaries and their employees in resolving conflicts of interest;
 - Protecting employees of the Company and the Subsidiaries in connection with the disclosure of a conflict of interest timely disclosed by such employee of the Company or the Affiliate and resolved (prevented) by the Company or the Affiliate.
- 6.3.4. Make sure that employees of the Company and the Subsidiaries:
- are guided by the interests of the Company and the Subsidiaries in making business decisions and performing their job duties;
 - avoid situations and circumstances that might lead to a conflict of interest;
 - disclose any existing (actual) or potential conflict of interest, including report the occurrence of a conflict of interest and fill out conflict of interest declarations;
 - assist in the resolution of the existing conflicts of interest.
- 6.3.5. Use specific procedure for disclosure about conflicts of interest, specifically when: hiring a person, appointing a person to a new position, as a conflict of interest situation arises or annual conflict of interest declarations are submitted.
- 6.3.6. Ensure that conflict of interest declarations are mandatorily filled out.
- 6.3.7. Identify persons responsible for receiving information on existing conflicts of interest.
- 6.3.8. Prohibit the signing of contracts with persons in relation to whom a conflict of interest, affiliation, or other power or authority abuses have been identified.
- 6.3.9. Establish methods for resolving conflicts of interest.
- 6.3.10. Define typical pre/conflict of interest situations.
- 6.3.11. Ensure the functioning of commissions on corporate ethics compliance and conflict of interest resolution.

6.4. Developing and implementing integrity standards and procedures

The Company and the Subsidiaries foster ethical and good faith employee conduct, and to this end:

- 6.4.1. develop and adopt codes of ethics and business conduct for employees of the Company and the Subsidiaries, which define:
- overall values and principles of the Company and the Subsidiaries;
 - specific rules and standards of employee conduct at the Company and the Subsidiaries aimed at fostering ethical and good faith employee conduct among employees of the Company and the Subsidiaries.
- 6.4.2. verify information on income, property, and property-related liabilities with respect to individuals applying for positions that subject to relevant declaration and for employees holding such positions at the Company and the Subsidiaries, and their close relatives, in accordance with the internal organizational and administrative documents of the Company and the Subsidiaries, in order to identify conflicts of interest, affiliations, and other abuses.
- 6.4.3. verify identity information of people hired or engaged under independent contractor agreement to minimize the risks of being held liable under Article 19.29. of the Code of Administrative Offences
- 6.4.4. be guided by the principles of integrity and objectivity in building their talent pools (including management talents):
- employees are appointed or transferred to higher positions only based on their

professional qualities, competencies and experience;

- employment of close relatives is prohibited, if they would directly report to each other or control each other in exercising their job duties;

- employees who closely related by blood or marriage are permitted to be in a relationship of direct subordination or control in exceptional cases under decision of the Central Commission on Corporate Ethics Compliance and Conflict of Interest Resolution;

- the Company and the Subsidiaries encourage labor dynasties. Situations when a production worker is directly subordinated to its close relative whose labor activity is that of labor dynasty, are recognized as permitted under decision of the Central Commission on Corporate Ethics Compliance and Conflict of Interest Resolution of PJSC “Rosseti” / Commission on Corporate Ethics Compliance and Conflict of Interest Resolution of the Company, subject to the conditions of inclusion in a labor dynasty;

- such employees are required to provide the information specified in Clause 6.4.2 of this Anti-Corruption Policy.

6.4.5. set out, in the local regulations of the Company and the Subsidiaries, rules of business gift exchange with partners and counterparties, which comply with the Russian law and do not pose a reputation risk for the Company and the Subsidiaries or employees of the Company and the Subsidiaries.

6.4.6. establish the obligation for the Company’s and the Subsidiaries’ employees to report all cases of receiving business gifts.

6.4.7. prohibit the Company’s and the Subsidiaries’ employees from giving business gifts in accordance with the Russian law and local regulations of the Company and the Subsidiaries.

6.4.8. establish and approve members of the collegial bodies at the Company and the Subsidiaries for the purposes of anti-corruption monitoring of procurement activities.

6.4.9. take measures to counteract the improper use of insider information and market manipulation.

6.4.10. arrange for anti-corruption reviews of local regulations of the Company and the Subsidiaries, and to the extent of their competence, draft legal regulations of the Russian Federation;

6.4.11. monitor accounting indicators, availability and reliability of source documents, including receivables accounting and writing off, feasibility of expenses, indicator adjustment periods, availability and reliability of source documents, etc.

6.4.12. Carry out charitable or sponsorship activities based on the principle of transparency, without the aim of obtaining or retaining an advantage in the commercial activities of the Company and the Subsidiaries, in accordance with the Russian law and local regulations of the Company and the Subsidiaries.

6.5. **Promoting law-abiding culture and raising legal awareness**

6.5.1. The Company and the Subsidiaries shall take measures to inform and raise awareness among their employees to eliminate the causes of corruption by:

- making available this Anti-Corruption Policy and other local anti-corruption regulations of the Company and the Subsidiaries;

- creating and improving sections of the Anti-Corruption Policy on the websites of the Company and the Subsidiaries;

- publishing information about efforts taken to implement this Anti-Corruption Policy in the corporate media and public media outlets;

- in cooperation with mass media, sharing successful experience of the Company’s and the Subsidiaries’ employees in countering attempts of corruption;

- organizing Anti-corruption events and social activities;

- providing upskilling for the Company’s and the Subsidiaries’ employees whose job duties

involve preventing corruption offenses, combating corruption, and compliance, through a two-level training program (basic level for first-time trainees, and advanced level for those who have already been trained);

- encouraging the Company's and the Subsidiaries' employees to provide verified information about corruption or other offenses at the Company and the Subsidiaries;
- guaranteeing that if an employee of the Company or a Subsidiary or an Affiliate refuses to engage in corrupt practices, this will not affect his or her career or financial position, even if such refusal results in losses for the Company or the Affiliate;
- making sure that employee of the Company and the Subsidiaries sign an agreement to comply with the principles and requirements of the Anti-Corruption Policy of the Company and the Subsidiaries and Russian Anti-Corruption Laws;
- declaring the need to develop corporate response mechanisms for committing corruption and other offenses.

6.5.2. Take into account compliance by employees of the Company and the Subsidiaries with the principles and requirements of the Anti-Corruption Policy when building the talent pool for promoting to higher positions at the Company and the Subsidiaries.

6.6. **Employee consulting and training**

6.6.1. The Company and the Subsidiaries shall organize various forms of employee training on combating corruption and corruption prevention by:

- conducting educational and outreach activities (briefings, training sessions, workshops, surveying, and tests for employees of the Company and the Subsidiaries) aimed at informing employees about the requirements of Russian laws and international Anti-Corruption Laws and at fostering zero tolerance to corruption among employees of the Company and the Subsidiaries, as well as by explaining:
 - the concept of corruption in the public and private sectors;
 - procedures of this Anti-Corruption Policy;
 - situations and circumstances (corruption risk factors and scenarios) that might lead to giving or taking a bribe;
 - key indications of corruption;
 - which officials of the Company and the Subsidiaries should be contacted and how to report any suspected corruption;
 - liability for committing corruption offenses;
 - requirements of the Russian law and local regulations of the Company and the Subsidiaries regarding the preventing and combating of corruption and the procedure for their application;
 - procedures to identify and resolve conflicts of interest;
 - due behavior in corruption risk situations, including in cases of bribe solicitation by federal or local government officials, or officials of public or municipal institutions, public or municipal unitary enterprises, state corporations, public companies and other organizations;
 - procedures for interacting with law-enforcement authorities.
 - providing confidential individual consultations to employees of the Company and the Subsidiaries on corruption prevention and combating;
 - ensuring, with the involvement of educational and research organizations, regular public lectures on Anti-corruption issues at the Company's and the Subsidiaries' units;
 - providing, with the involvement of educational and research organizations, advanced training for employees of the Company's and the Subsidiaries' units whose job duties involve preventing corruption offenses, combating corruption, and compliance, under additional professional education programs.

6.7. **Reviewing and checking whistleblowing reports**

6.7.1. The Company and the Subsidiaries shall receive reports from their employees, partners, counterparties, and other persons (individuals or legal entities) about alleged cases of corruption using the online communication channel, hotline, mail, or email.

6.7.2. The Company and the Subsidiaries shall take efforts to protect their employees who disclose information through the communication channels specified in paragraph 6.7.1 from any form of pressure (including dismissal, down-grading, or any form of discrimination).

6.7.3. The Company and the Subsidiaries shall endeavor to establish a set of effective measures to verify information on alleged cases of corruption and, if confirmed, to eliminate (mitigate) the consequences and the causes contributing to them.

6.8. **Measures to combat and prevent corruption in working with partners, clients and counterparties**

6.8.1. The Company and the Subsidiaries shall focus on establishing and maintaining business relations with partners and counterparties that:

- embrace the Anti-Corruption Policy;
- conduct business relations in good faith and honestly;
- take care of their own reputation;
- embrace high ethical standards in conducting business;
- implement their own anti-corruption measures;
- participate in collective Anti-corruption initiatives.

6.8.2. Through the Anti-Corruption Clause and Anti-Corruption Commitments, the Company and the Subsidiaries shall inform their partners and counterparties about the acceptable standards and rules of conduct.

6.8.3. The Company and the Subsidiaries shall inform their partners and counterparties about:

- their adherence to the Anti-Corruption Charter of Russian Businesses;
- mandatory compliance with the requirements of the Anti-Corruption Procurement Standard (Procurement Regulations).

The Anti-Corruption Procurement Standard (Procurement Regulations) is available on the Company's corporate website.

6.8.4. The Anti-Corruption Procurement Standard sets out a procedure for auditing procurement documents and procurement entities and counterparties to assess their reliability and integrity, prevent affiliation and the conflict of interest risk and other abuses of powers or authorities attaching to the positions held at the Company and the Subsidiaries.

As part of auditing procurement entities, winning entities, counterparties and/or other third parties and co-contractors/subcontractors engaged by counterparties, efforts are taken to identify the counterparty's ownership structure, including beneficiaries, including ultimate individual beneficiaries, and the membership of their executive bodies; verify their reputation and track record in the market of goods/work/services, involvement in corruption scandals, fraud scheme, etc.; prevent conflicts of interest, affiliation and other abuses of powers and authorities.

If a procurement entity, winning entity or counterparty does not apply anti-corruption measures, the Company and the Subsidiaries may recommend such counterparties to implement such measures or take such facts into account for bid evaluation or subsequent interaction.

6.8.5. The Company and the Subsidiaries shall have a set of rules that oblige partners, counterparties and their subcontractors/co-contractors, when fulfilling their obligations, including acting on behalf of or for the benefit of the Company and the Subsidiaries, withhold from any activities qualified as giving a bribe (Article 291 of the Russian Criminal Code), taking a bribe (Article 290 of the Russian Criminal Code), mediation in bribery (Article 291.1 of the Russian Criminal Code), commercial bribery (Article 204 of the Russian Criminal Code), abuse of authority

(Article 201 of the Russian Criminal Code), (illegal rewarding on behalf of a legal entity (Article 19.28 of the Code of Administrative Offenses), or other unlawful activities (act or omission) having the attributes of corruption.

6.8.6. As the counterparty performs the contract, the Company and the Subsidiaries shall follow up the provision of information on the counterparty's chain of ownership, including the individual ultimate beneficiary, if the counterparty's ownership structure changes, and on third parties engaged by the counterparty to perform the contract, as well as deadlines for the performance of contractual obligations and the counterparty's financial position and compliance with the Anti-Corruption Clause.

If a counterparty of the Company or a Subsidiary or an Affiliate fails to comply with the requirements of clause 6.8.6. of this Anti-Corruption Policy, the contract shall be terminated under the procedure set out by the Company or the Affiliate.

6.8.7. The Company and the Subsidiaries may provide corruption combating and prevention training for their partners and counterparties, specifically the partners and counterparties who act on behalf and for the benefit of the Company and the Subsidiaries.

6.8.8. Counterparties, the Company and the Subsidiaries refuse to incentivize each other's employees in any way, including by providing money, business gifts, gratuitous work (services), or other ways that are not specified herein, which make the employee dependent and are aimed at ensuring that the employee performs any actions for the benefit of the incentivizing party (the counterparty or the Company and a Subsidiary or an Affiliate).

Actions taken by an employee for the benefit of the incentivizing party (counterparty or the Company and a Subsidiary or an Affiliate)

mean:

- providing unreasonable advantages over other counterparties;
- providing any guarantees or preferences;
- expediting existing procedures;
- other actions exercised by an employee as part of his or her job duties, however in contrary to the principles of transparency and openness in the relationships between the counterparty and the Company or a Subsidiary or an Affiliate.

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

6.9.1. To minimize corruption and reputation risks and the risk of sanctions for bribing foreign officials in international commercial transactions, taking bribes in the course of core operations authorized by the Articles of Association of the Company and the articles of association of the Subsidiaries, the Company and the Subsidiaries take the following measures, taking account of the Russian legal regulations, paragraph 9 of the Anti-Corruption Charter of Russian Businesses, international standards, and this Anti-Corruption Policy:

- analyze business processes at the Company and the Subsidiaries to identify the factors of such corruption risks, and develop and implement control procedures to minimize such risks;
- inform the employees of the Company and the Subsidiaries on the liability for bribing and/or taking bribes from foreign officials or officials of public international organizations;
- keep records of foreign public officials and officials of public international organizations with which the Company and the Subsidiaries engage in contractual and pre-contractual relations, and records of employees of the Company and the Subsidiaries involved in such engagements;
- inform the Investigative Committee of the Russian Federation of revealed bribery of foreign officials;
- in conducting international commercial transactions, if necessary, seek advice and support from foreign diplomatic and trade representations of the Russian Federation;
- inform stakeholders, as part of the Anti-Corruption Monitoring, about efforts taken by

the Company and the Subsidiaries to prevent bribery of foreign public officials and officials of public international organizations,

- interact with representatives of governmental authorities and law enforcement authorities, international and other organizations to develop and improve measures to prevent bribery of foreign public officials and officials of public international organizations;
- monitor the effectiveness of the control procedures and measures taken.

6.10. Interacting with governmental control and supervision authorities

6.10.1. When interacting with the Russian governmental control and supervision authorities, employees of the Company and the Subsidiaries are prohibited from giving, offering or promising, on behalf and for the benefit of the Company and the Subsidiaries, any business gifts, including, the value of which is less than three thousand rubles, money, securities or other property, provide monetizable services or property rights.

6.10.2. The Company and the Subsidiaries establish the procedure for reporting to law enforcement authorities about breaches of the code of conduct applicable to public and civil servants in performing their audit and oversight functions at the Company and the Subsidiaries, and ensure the out-of-court procedure for appealing against their actions.

6.10.3. The Company and the Subsidiaries assist law-enforcement authorities in inspecting the efforts undertaken by the Company and the Subsidiaries to prevent and combat corruption.

6.10.4. Ensure compliance with Russian laws, instructions from the Chairman of the Government of the Russian Federation¹ and decisions of the Commission for the Development Strategy of the Energy Sector and Environmental Security under the President of the Russian Federation² to ensure the transparency of the financial and business operations of the Company and the Subsidiaries.

6.11. Cooperation with law enforcement authorities in combating corruption

6.11.1. In accordance with Clause 2 of Article 13.3. of the Anti-Corruption Law, the Company and the Subsidiaries cooperate with law enforcement authorities as follows:

- report cases of corruption and other offenses of which the Company and the Subsidiaries become aware to the relevant law enforcement authorities;
- assist in identifying and investigating cases of corruption, suppressing or investigating corruption offenses, and take the necessary measures to preserve and deliver to law enforcement authorities documents and information containing data on corruption offenses;
- prevent employees of the Company and the Subsidiaries from unduly interfering activities performed by law enforcement authorities,
- refrain from any sanctions with respect to the Company's and the Subsidiaries' employees who report to law enforcement authorities any information about corruption or other offenses being prepared or committed, which becomes known to them in the course of performance by them of their employment (job) duties.

6.12. Participation in public initiatives to combat and prevent corruption

6.12.1. To implement in its activities corruption prevention and combating measures, the Company and the Subsidiaries create conditions to foster zero public tolerance towards corruption in interaction with government authorities and in corporate relations, share experience, and involve in joint anti-corruption initiatives:

- initiatives related to the implementation of the Anti-Corruption Charter of Russian Businesses in accordance with the Regulations on the Terms and Procedure for Implementing the

¹ Instructions of the Government of the Russian Federation No. VP-P13-9308 of December 28, 2011 and No. VP-P24-1269 of March 5, 2012 to disclose information on the ownership structure of counterparties, disclose information on the income, property, and property-related liabilities of managers, and prevent and identify conflicts of interest and other abuses associated with positions held at the Company.

² Minutes No. A-60-26-8 of the Commission for the Development Strategy of the Energy Sector and Environmental Security under the President of the Russian Federation, of July 10, 2013.

Provisions of the Anti-Corruption Charter of Russian Businesses;

- the use of standard Anti-corruption clauses in joint agreements;
- public refusal to interact with organizations involved in corruption crimes;
- organizing and providing joint training on corruption prevention and combating;
- involvement of employees of the Company and the Subsidiaries in international and other Anti-corruption events.

6.12.2. The Anti-Corruption Action plan implemented by the Company and the Subsidiaries is shown in Appendix 3, which is an integral part of this Anti-Corruption Policy.

7. Subsidiaries

The Company and the Subsidiaries shall, in accordance with the existing corporate governance system of the Company and the Subsidiaries, initiate the adoption by the Subsidiaries of their own Anti-corruption policies similar to this Anti-Corruption Policy, as well as take reasonable efforts to ensure that the fundamental principles and requirements of the Anti-Corruption Policy are observed by joint ventures, companies, and associations in which the Company and the Subsidiaries hold shares or stakes.

8. Liability

8.1. Employees of the Company and the Subsidiaries, regardless of their position, shall be personally responsible for compliance with this Anti-Corruption Policy.

8.2. The Company and the Subsidiaries shall take efforts to ensure that persons guilty of corruption offenses are held liable in accordance with the Russian Anti-Corruption Laws.

8.3. Persons guilty of violating the Anti-Corruption Policy shall be charged with corporate sanctions.

8.4. Liability for corruption and other offenses at the Company and the Subsidiaries includes disciplinary, administrative, and criminal liability in accordance with Russian laws, as well as corporate sanctions in accordance with local regulations of the Company and the Subsidiaries.

9. Adoption, implementation analysis, and revision of the Anti-Corruption Policy

9.1. The Company and the Subsidiaries shall regularly monitor effectiveness of the Anti-Corruption Policy measures both through internal and/or external audits.

9.2. The Company and the Subsidiaries shall provide conditions in which employees and other stakeholders can freely report deficiencies in the implementation of this Anti-Corruption Policy and make suggestions for its improvement.

9.3. The outcomes of implementing the Anti-corruption plan shall be reflected in the social reports of the Company and the Subsidiaries.

9.4. This Anti-Corruption Policy shall be updated when:

- provisions of this Anti-Corruption Policy need to be aligned with amendments in Russian or applicable international Anti-Corruption Laws;
- the Company's organizational and staffing or functional structure undergoes changes that directly affect the implementation of this Anti-Corruption Policy;
- this Anti-Corruption Policy measures need to be improved.

List of Russian legal regulations underlying the Company's Anti-Corruption Policy

- Russian Civil Code;
- Labor Code of the Russian Federation;
- Code of Administrative Offences of the Russian Federation;
- Criminal Code of the Russian Federation;
- Federal Law No. 208-FZ of December 26, 1995 (On Joint Stock Companies);
- Federal Law No. 115-FZ On anti-money laundering and combating the financing of terrorism, of August 7, 2001;
- Federal Law No. 273-FZ On combating corruption, of December 25, 2008;
- Federal Law No. 224-FZ On counteracting the misuse of insider information and market manipulation and on amendments to certain statutory acts of the Russian Federation, of July 27, 2010;
- Federal Law No. 230-FZ On monitoring the matching between expenditures of governmental officials and other persons and their revenues, of December 3, 2012;
- Federal Law No. 79-FZ On the prohibition for certain categories of persons to open and have accounts (deposits), keep cash and valuables with foreign banks located outside the Russian Federation, and to own and (or) use foreign financial instruments, of May 7, 2013;
- Executive Order No. 309 of the President of the Russian Federation, On measures to implement certain provisions of the Federal Law On Combating Corruption’, of April 2, 2013;
- Executive Order No. 613 of the President of the Russian Federation, Issues related to combating corruption, of July 8, 2013;
- Executive Orders of the President of the Russian Federation regarding the National Anti-corruption Plan;
- Resolution No. 568 of the Government of the Russian Federation, On extending restrictions, prohibitions, and obligations established by the Federal Law “On Combating Corruption” and other federal Anti-Corruption Laws to certain categories of individuals, of July 5, 2013;
- Resolution No. 613 of the Government of the Russian Federation, On submission by individuals applying for positions at organizations established to perform tasks set for the Government of the Russian Federation and employees filling positions at such organizations of information on their income, expenditures, property, and property-related obligations, and on verifying the reliability and completeness of the information provided and employees’ compliance with the requirements for professional conduct, of July 22, 2013;
- Resolution No. 10 of the Government of the Russian Federation, On the procedure for reporting by certain categories of persons of gifts received by them in connection with their official position or performance of their official duties, delivery and evaluation of gifts, sale (redemption) and transfer of proceeds from their sale, of January 9, 2014;
- Resolution No. 29 of the Government of the Russian Federation, On approving the rules for notification by the employer of the signing of an employment contract or independent contractor agreement for performing work (providing services) with an individual who held a state or municipal service position, included in the list of positions set out in regulatory legal acts of the Russian Federation, of January 21, 2015;
- Strategy for the Development of the Electric Grid Sector of the Russian Federation, approved by Instruction No. 511-r of the Russian Government, of April 3, 2013;

- Guidelines on Developing and Taking Measures to Prevent and Combat Corruption at Organizations, developed by the Ministry of Labor and Social Protection of the Russian Federation and approved on March 28, 2014;
- Guidelines on Corruption Risk Management and Internal Control Processes to Prevent and Combat Corruption, as approved by the Federal Agency for State Property Management (Rosimushchestvo) in its Order No. 80 of March 2, 2016.
- The Corporate Governance Code approved at the meeting of the Russian Government on February 13, 2014, approved by the Board of Directors of the Bank of Russia on March 21, 2014, and recommended for application by joint-stock companies (the “Corporate Governance Code”).
- The Anti-Corruption Charter of Russian Businesses, as approved by the Russian Chamber of Commerce and Industry, the Russian Union of Industrialists and Entrepreneurs, the All-Russia Public Organization “Business Russia”, and the All-Russia Public Organization “OPORA Rossii”.
- Other legal acts on preventing and combating corruption.
- Minutes/reports and instructions of Russian government authorities:
- Minutes No. A-60-26-8 of the Commission for the Development Strategy of the Energy Sector and Environmental Security under the President of the Russian Federation, of July 10, 2013;
- Instructions of the Government of the Russian Federation No. VP-P13-9308 of December 28, 2011 and No. VP-P24-1269 of March 5, 2012 on disclosing information on the ownership structure of counterparties, providing information on the income, property and property related obligations of management, and on preventing and identifying conflicts of interest and other abuses related to positions held at PJSC “Rosseti” and its Subsidiaries;
- GOST R ISO 26000-2012 Social Responsibility Guidelines;
- Articles of Association of the Company;
- Code of Ethics and Business Conduct of Employees of the Company.

Terms and definitions of this Anti-Corruption Policy

Anti-Corruption Clause	A section/clause included in agreements and contracts of the Company and the Subsidiaries to state the anti-corruption position of the Company and the Subsidiaries and prevent corruption and other offenses.
Anti-Corruption Policy	An organizational and administrative document of the Company setting out a system of interrelated principles, procedures, practices, and specific measures aimed at preventing and combating corruption. The term is applied to the Company and the Subsidiaries depending on the context.
Anti-Corruption Commitments	Commitment on the part of a procurement entity within the Company and the Subsidiaries to comply with and fulfill the principles and requirements of the Anti-Corruption Policy, including the obligation not to commit corrupt acts or other offenses and to provide complete and reliable information on the chain of ownership, including individual ultimate beneficiaries, and on the membership of executive bodies, accompanied by supporting documents.
Anti-Corruption Monitoring	Collection, analysis, and consolidation of information on measures taken by the Company and the Subsidiaries to assess the effectiveness of such measures, analyze corruption factors and risks; analyze and assess data obtained through monitoring; forecast corruption offenses and develop methods to combat corruption.
Bribing	Bribing an official, a foreign official, or an official of a public international organization, personally or through an intermediary (including when the bribe is given to another individual or legal entity as instructed by such official). “Foreign official” means any person appointed or elected to hold any position in a legislative, executive, administrative, or judicial body of a foreign state, or any person performing any public function for a foreign state, including for a public agency or public enterprise. “Official” of a public international organization means an international civil servant or any person who is authorized by such organization to act on its behalf, members of parliamentary assemblies of international organizations to which the Russian Federation is a member, persons holding the positions of judges in any international court whose jurisdiction is recognized by the Russian Federation (Article 291 of the Russian Criminal Code).

Business gift (for the purposes of the Anti-Corruption Policy)	A gift that an employee of the Company or the Subsidiaries may receive in connection with hospitality events, business trips, other formal events or in other events within the limits and rules of the Russian law and local regulations of the Company and the Subsidiaries.
Abuse of authority	<p>Use of powers by a person performing managerial functions for a commercial or other organization contrary to the legitimate interests of such organization and to derive benefits and advantages for himself/herself or for other persons, or to cause damage to other persons, if such action has inflicted substantial damage to the rights and legitimate interests of individuals or organizations, or to legally protected interests of society or the state.</p> <p>A person performing managerial functions for a commercial or other organization, as well as for a non-commercial organization, which is not a state body, local government body, state or municipal institution means a person performing the functions of the chief executive officer, a member of the board of directors or other collective executive body, as well as a person performing organizational and administrative or administrative and economic functions at such bodies permanently, temporarily, or by special mandate (Article 201 of the Russian Criminal Code).</p>
Foreign public officials and officials of public international organizations	<p>“Official” of a public international organization means an international civil servant or any person who is authorized by such organization to act on its behalf, members of parliamentary assemblies of international organizations to which the Russian Federation is a member, persons holding the positions of judges in any international court whose jurisdiction is recognized by the Russian Federation.</p> <p>(Article 290 (Taking a Bribe) of the Russian Criminal Code as amended by Resolution of the Plenum of the Supreme Court of the Russian Federation No. 59 of December 24, 2019).</p>
Commercial Bribery	<p>Illegal transfer of money, securities, other property, as well as illegal rendering of monetizable services, granting of other property rights to a person performing managerial functions for a commercial or other organization (including when property is transferred or benefits are given that are property, assets or similar items, or property rights are granted to another individual or legal entity as instructed by such person) for committing acts (omission) in the interests of the briber or other persons, if such actions (omission) are within the competence of such a person or if they can enable such acts (omission) by abusing their office (Article 204 of the Criminal Code).</p>

Compliance	Compliance of the organization's activities with the applicable requirements of Russian and foreign laws, local regulatory acts, and other binding regulatory documents.
Counterparty	Any Russian or foreign legal entity or individual with whom the Company of the Affiliate enters into contractual relations by setting a certain amount of rights and obligations (except for employment relations), and which are not united by a common goal.
Conflict of interest	Personal interests (direct or indirect) of a person who holds a position which provides for the duty to take measures to prevent and resolve conflicts of interest, which affects or may affect the proper, objective, and impartial exercise his or her job duties or powers.
Corruption offense	An unlawful guilty action (or omission) that can be qualified as corruption, with respective disciplinary action or criminal, civil, or administrative liability prescribed by the Russian law.
Corruption risk	Potential of committing a corruption offense by an employee of the Company and the Subsidiaries.
Corruption	a) abuse of power or authority, giving a bribe, taking a bribe, commercial bribery or any other illegal use by employees of their position contrary to the lawful interests of the society and the state in order to obtain benefits in the form of money, valuables, other property, or monetizable services or other property rights for themselves or for third parties, or the illegal provision of such benefits to such person by other individuals, b) and the performance of such actions on behalf or for the benefit of a legal entity.
Personal interest	Potential to receive income in the form of money, other property, including monetizable services or other property rights, deliverables or any benefits (advantages) by an employee of the Company and/or a Subsidiary or an Affiliate and/or persons closely related to him or her by blood or marriage (parents, spouses, children, brothers, sisters, or brothers, sisters, parents, children of spouses and spouses of children), individuals or entities with whom an employee of the Company and/or a Subsidiary or an Affiliate and/or persons who are closely related to him or her by blood or marriage have

Close Relatives (persons closely related to a manager/employee by blood or marriage)	Parents, spouses, children, brothers, sisters, as well as brothers, sisters, parents, and children of spouses, and spouses of children.
Material benefit	Benefit in cash or in kind that can be assessed and qualified as income under Russian tax laws.
Ministry of Labor Guidelines	Guidelines on Developing and Taking Measures to Prevent and Combat Corruption at Organizations, developed by the Ministry of Labor and Social Protection of the Russian Federation and approved on March 28, 2014.
Illegal reward on behalf of a legal entity	<p>Illegal transfer, offer, or promise of money, securities, or other property on behalf of a legal entity or in the interests of a legal entity, or in the interests of a related legal entity to an official, a person performing managerial functions for a commercial or other organization, a foreign public official, or an official of a public international organization, or provision of monetizable services or granting of property rights to any of them (including if by order from a public official, a person performing managerial functions for a commercial or other organization, a foreign public official or a public international organization, such money, securities, or other property are transferred, offered, or promised, or if such monetizable services or property rights are provided to another individual or legal entity) for performing any action (omission) to such related to his or her official position to such official, person performing managerial functions for a commercial or other organization, foreign public official, or official of a public international organization, related to his or her official position (Article 19.28 of the Code of Administrative Offenses). Officials are persons who permanently, temporarily, or by special mandate perform the functions of a governmental representative or perform organizational and administrative, or administrative and economic functions for governmental authorities, local government authorities, state and municipal institutions, state corporations, state companies, state and municipal unitary enterprises, joint-stock companies, the controlling interest in which belongs to the Russian Federation, constituent entities of the Russian Federation, or municipalities, as well as in the Armed Forces of the Russian Federation, other military branches or units of the Russian Federation</p>

<p>Illegal employment/contracting of state or municipal officers employees or a former state or municipal officers</p>	<p>Involvement by an employer or customer of works (services) of a state or municipal employee who holds a position included in the list set out in regulatory legal acts, or a former state or municipal employee who held such position in a violation of the Anti-Corruption Law, in labor activities under an employment contract or in the performance of work or delivery of services under an independent contractor agreement (Article 19.29 of the Code of Administrative Offences).</p>
<p>Partner</p>	<p>Any Russian or foreign legal entity or individual with whom the Company or a Subsidiary or an Affiliate enters into contractual relations to achieve a common goal</p>
<p>Taking a bribe</p>	<p>Taking 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 through illegal provision to him or her of monetizable services, granting of other property rights (including when a bribe is given to another individual or legal entity as instructed by such official) for the performance of actions (omission) for the benefit of the bribe giver or persons represented by him or her, if such actions (omission) fall within the official competence of the official or if he or she may contribute to such actions (omission) due to his or her official position, as well as for general support or condonation in their official capacity (Article 290 of the Russian Criminal Code).</p>
<p>Mediation in bribery</p>	<p>Handing over a bribe on behalf of the briber or the bribe taker or otherwise assisting the briber and/or the bribe taker in reaching or implementing an agreement between them on taking and giving a significant bribe, as well as promising or offering to mediate in bribery (Article 291.1 of the Russian Criminal Code).</p>
<p>Pre-conflict situation</p>	<p>A situation where an employee of the Company or a Subsidiary or an Affiliate or the Customer/Procurement Organizer or their representative, has a personal interest while performing his or her official or professional duties, which could lead to a conflict of interest.</p>

Solicitation of a bribe, Commercial Bribery, or secret commission related to procurement of goods, works, or services for state or municipal needs	An attempt to give an official, a foreign official, an official of a public international organization, a person performing managerial functions for commercial or other organizations, or a person referred to in Part 1 of Article 200.5 of the Russian Criminal Code (a contracts service officer, contract manager, member of a procurement committee, a person who accepts delivered goods, work or services, or another authorized officer representing the customer in the procurement of goods, work or services for government or municipal needs), without his or her consent, money, securities, or other property, or provide other monetizable services, or granting other property rights in order to artificially create evidence of an offence or to blackmail (Article 304 of the Russian Criminal Code).
Corruption prevention (practices)	The entity's efforts aimed at introducing elements of a corporate culture, organizational structure, rules and procedures governed by local regulations to prevent corruption offences.
Corruption prevention	The organization's activities aimed at identifying and eliminating factors causing corruption.
Combating corruption	Efforts taken by the Company and the Subsidiaries and employees of the Company and the Subsidiaries, to the extent of their authority, to prevent corruption, identify, prevent, suppress, disclose and investigate corruption offenses (combating corruption), minimize and/or eliminate the consequences of corruption offenses.
Employee of the Company or a Subsidiary or an Affiliate	An employee with whom the Company or a Subsidiary or an Affiliate maintains an employment contract or independent contractor agreement
Unit responsible for preventing corruption offenses, combating corruption, and compliance	The Anti-Corruption Compliance Procedures Division or a unit at a Subsidiary or an Affiliate who is authorized with the functions of preventing corruption offenses, combating corruption, and compliance control as per the Affiliate's organizational structure.
Labor dynasty	A group of production workers of the Company who are closely related by blood or marriage (parents, spouses, children, brothers, sisters, as well as brothers, sisters, parents, children of spouses and spouses of children) consisting of at least three people of at least two generations who pass professional skills from generation to generation.

Procurement entity	Any legal entity or a group of legal entities acting on the side of a procurement entity, regardless of the legal form, form of ownership, location or origin of capital other than a legal entity who is a foreign agent in the meaning of Federal Law No. 255-FZ “On Control over the Activities of Persons Under Foreign Influence” of July 14, 2022, or any individual or a group of individuals acting on the side of a procurement entity, including sole proprietor or a group of sole proprietors acting on the side of a procurement entity, other than an individual who is a foreign agent in the meaning of Federal Law No. 255-FZ “On Control over the Activities of Persons Under Foreign Influence” of July 14, 2022.
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<p>Anti-Corruption Action at the Company and the Subsidiaries</p> <p>Practices for implementing the Anti-Corruption Policy / Anti-Corruption Action at PJSC “Rosseti Lenenergo”</p>
1. Functions and tasks assigned to units and officials responsible for preventing corruption offenses and combating corruption.
1.1. Updating the Anti-Corruption Policy (describing the tasks, functions, responsibilities, and powers of the structural unit or officials responsible for eliminating the causes of corruption offence, combating corruption, and compliance).
1.2. The units of the Company and the Subsidiaries responsible for preventing corruption offenses, combating corruption, and compliance, shall be determined.
2. Corruption risk management process at the Company and its Subsidiaries and Affiliates
2.1. Analyzing business processes, identifying the oversight environment, identifying, describing and assessing corruption risks (maintaining a corruption risk register/list, risk descriptions, updating the map of corruption risks, identifying the corruption risk owners and preparing the list of positions associated with a high risk of corruption).
2.2. Describing corruption risk factors and assessing their possible consequences.
2.3. Developing a set of measures to eliminate and minimize corruption risks.
2.4. Establishing special Anti-corruption procedures and requirements, including regular filing of declarations on conflict of interests.
2.5. Assessing the effectiveness and following up ongoing measures to minimize corruption risks at the Company and the Subsidiaries. Monitoring risk factors.
2.6. Developing new and improving ongoing measures to minimize corruption risks.
2.7. Annually updating corruption risk descriptions.
2.8. Following up compliance with the requirements of the Anti-Corruption Policy at the Company and the Subsidiaries.
2.9. Monitoring and supervision economic feasibility of expenses of the Company and the Subsidiaries in areas with a high risk of corruption (exchange of business gifts, hospitality expenses, charitable donations, external advisor fees, etc.), including through the method for validating the calculation of the initial (maximum) procurement price.
3. Following up the risk management system and internal controls with regard to corruption prevention and combating and assessing their performance
3.1. Self-assessing the effectiveness of corporate and process controls in combating and preventing corruption.
3.2. 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. external independent assessment of the effectiveness of the Risk Management and Internal Control System (the “RMS&ICS”) in combating and preventing corruption, and submitting the results of the assessment for review to the Company’s Board of Directors and boards of directors of the Subsidiaries.
3.4. Submitting Anti-Corruption Monitoring reports to the Company’s Board of Directors (subject to preview by the Audit Committee of the Board of Directors) and boards of directors of the Subsidiaries.

4. Prevention and resolution of conflicts of interest

4.1. Developing and adopting local regulations on resolution of conflicts of interest at the Company and the Subsidiaries (including the procedure for informing employees of the Company and the Subsidiaries about the occurrence of a conflict of interest and resolution of an identified conflict of interest, outlining employees' duties and responsibilities, standard situations of pre-conflict of interest, etc.) and preparing conflict of interest declarations.

4.2. Updating the operational procedures of the collegial bodies (commissions) for conflict of interest resolution (the Central Commission on Corporate Ethics Compliance and Conflict of Interest Resolution at PJSC "Rosseti" and the Company's commissions).

4.3. Investigating the existence of a conflict of interests of employees with the participation of the Company's and the Subsidiaries' units responsible for preventing corruption offenses, combating corruption, and compliance.

4.4. Informing employees about local regulations adopted to resolve conflicts of interest and the obligation to comply with the requirements outlined therein.

4.5. Implementing and supporting efforts to resolve conflicts of interest.

4.6. Enabling the process of declaring conflicts of interest by applicants for vacant positions at the Company and the Subsidiaries when hiring or transferring to managerial positions.

4.7. Annual declaration of conflicts of interest by employees of the Company and the Subsidiaries.

4.8. Analyzing information submitted as part of declaration of conflicts of interest by employees of the Company and the Subsidiaries.

4.9. Submitting a report on declaration of conflicts of interest by employees of the Company and the Subsidiaries to the Central Commission on Corporate Ethics Compliance and Conflict of Interest Resolution at PJSC "Rosseti".

4.10. Enabling annual declaration of income, property, and property-related liabilities by the persons set out in the local regulations of the Company and the Subsidiaries in accordance with the regulations of the Russian Federation.

4.11. Developing measures to resolve pre-conflict situations and resolve conflicts of interest of a manager or employee (including revision or change of their job duties and job functions, removal from making decisions that give rise to conflicts of interest, transfer to another position, termination of the employment contract, etc.).

4.12. Following up the implementation of legal measures to enforce liability prescribed by law in each case of violating bans, restrictions, or requirements established to combat corruption, including measures to prevent and/or resolve conflicts of interest.

5. Developing and implementing integrity standards and procedures

5.1. Developing (jointly with public associations) and implementing a set of organizational, awareness raising, and other measures to ensure compliance by the Company's and the Subsidiaries' employees with the prohibitions, restrictions, and requirements established by the Anti-Corruption Law.

5.2. Updating the Code of Ethics and Business Conduct of Employees of the Company.

5.3. Establishing a prohibition regarding employment of persons who are closely related to each other by blood or marriage if such employment results in subordination or control relations between them.

5.4. Developing and adopting rules governing the exchange of business gifts and hospitality, charity or sponsorship.

5.5. Signing an agreement on compliance with the requirements of the Anti-Corruption Policy with the employees of the Company and the Subsidiaries.

5.6. Participating in the selection of applicants for positions at the Company and the Subsidiaries to prevent corruption and exclude the risk of a conflict of interest.

5.7. Taking measures to prevent the unlawful use of insider information and market manipulation.
5.8. Developing and including Anti-corruption provisions in employment contracts and independent contractor agreements with employees of the Company and the Subsidiaries, and contracts/agreements with contractors and partners.
6. Reviewing and checking whistleblowing reports on alleged corruption offenses and other cases of abuse
6.1. Following up the implementation of local regulations on the procedure for reviewing reports of alleged cases of corruption at the Company and the Subsidiaries (the procedure for accepting, reviewing, and resolving reports, the review period, the procedure for interaction with structural units, the introduction of procedures for employees to inform their employer of cases when they were induced to commit corruption offenses, etc.).
6.2. Monitoring the continuous functioning of available information channels, feedback mechanisms, telephone and other hotlines, etc. Following up the publication and update of the information at production units (Pus) and electric grid districts (EGDs) of the Subsidiaries and Affiliates.
6.3. Following up the organization and support of report management. Participation of responsible officers of the Subsidiaries in the management of reports received by the Company.
6.4. Analyzing and monitoring compliance with Anti-corruption prohibitions, restrictions, and requirements, including those related to the receipt of gifts by certain groups of persons, performance of other paid work, and obligations to report inducements to commit corruption offenses.
6.5. Adopting procedures to protect employees who reported corruption offenses.
7. Raising legal awareness, promoting law-abiding behavior in employees, employee consulting and training
7.1. Developing and publishing methodological, informational, and explanatory materials on Anti-corruption standards of conduct.
7.2. Publishing information about measures to implement the Company's Anti-Corruption Policy on the corporate websites of the Company and the Subsidiaries, in the corporate newspaper, media, and other sources.
7.3. Share, in cooperation with mass media, positive experience of the Company and its employees in countering attempts of corruption.
7.4. Ensuring annual upskilling for employees whose job duties involve participation in combating corruption through a two-level educational program (basic level for first-time trainees and advanced level for those who have already been trained).
7.5. Conducting training and awareness-raising activities on eliminating the causes of, and preventing, corruption (trainings, workshops, conferences, forums, round tables, etc.) aimed at informing employees of the Company and the Subsidiaries about the requirements of the applicable Russian and international laws on combating corruption and building Anti-corruption awareness among employees.
7.6. Fostering zero tolerance towards corruption among employees of the Company and the Subsidiaries.
7.7. Individual consultations for employees of the Company and the Subsidiaries on the application (compliance with) of Anti-corruption standards and procedures.
7.8. Ensuring, in cooperation with educational and research organizations, regular public lectures on Anti-corruption issues at the Company's and the Subsidiaries' units.
7.9. Organizing annual workshops by the Company's unit responsible for preventing corruption offenses and combating corruption on the application of Russian Anti-Corruption Laws with heads of the Subsidiaries' units responsible for preventing corruption offenses and combating corruption.
8. Measures to combat corruption and prevent corruption in working with partners, clients and counterparties

8.1. Following up special counterparty review procedures to reduce the risk of involving the Company's and the Subsidiaries' employees in corrupt and other unfair practices (improvement of the unified automated system for analyzing and collecting information on counterparty beneficiaries (AS ASIB), which checks counterparties' reliability and financial stability (absence in the register of dishonest suppliers, negative background, etc.).
8.2. Following up the implementation by the Company and the Subsidiaries of a corporate-wide mechanism for Anti-Corruption Monitoring of procurement activities (the Anti-Corruption Procurement Standard).
8.3. Updating local regulations on the organization of disclosures about the chain of owners of procurement entities and counterparties of the Company and the Subsidiaries.
8.4. Distributing programs, policies, standards of conduct, procedures, and rules among contractors and partners that are aimed at preventing and combating corruption and are applied by the Company and the Subsidiaries (Anti-Corruption Commitments, Anti-Corruption Standard, Anti-Corruption Clause, etc.).
8.5. Informing the public of the extent to which anti-corruption measures have been implemented and succeeded (publishing relevant information on the corporate websites of the Company and the Subsidiaries, in media, and other sources).
9. Interaction with regulatory and supervisory authorities and with law-enforcement authorities in combating corruption
9.1. Developing and approving local regulations on the procedure for the Company's interaction with regulatory and supervisory authorities and law enforcement agencies.
9.2. Interacting with federal governmental authorities regarding implementing legal provisions related to preventing and combating corruption and regulatory framework improvements including the development of proposals for amending the existing Russian laws and regulations on preventing and combating corruption. Participating in working groups (expert panels) of the General Prosecutor's Office, Federal Financial Monitoring Service (Rosfinmonitoring), and the Chamber of Commerce and Industry of the Russian Federation, etc.
9.3. Assisting in detecting and investigating corruption offenses by law enforcement authorities.
9.4. Assisting in inspections without hindering the lawful activities of inspectors; reporting cases of corruption offenses.
10. Participation in public initiatives to combat and prevent corruption
10.1. Implementing provisions of the Anti-Corruption Charter of Russian Businesses:
10.1.1 Organizing and supporting engagements with representatives of the Russian business community: the Russian Chamber of Commerce and Industry, the Russian Union of Industrialists and Entrepreneurs, Business Russia, OPORA Russia, and other signatories of the Charter (participation in working groups, joint training, etc.).
10.1.2 . Conducting corruption preventing and combating activities: - ensuring compliance with the Company's commitments as a member of the Anti-Corruption Charter of Russian Businesses; - participating in the interdepartmental project team of the Ministry of Labor and Social Protection of the Russian Federation for the compliance of government authorities and agencies with the Russian Anti-Corruption Law.
10.2. Participation in other collective initiatives:
10.2.1 Using standard Anti-Corruption Clauses in joint agreements,
10.2.2 Publishing public statements of the Company's CEO to employees, counterparties, and partners of organizations regarding zero tolerance towards corruption and bribery on corporate websites.
10.2.3 Publicly refusing to conduct joint business with organizations (persons) involved in corruption

crimes.
10.2.4 Involvement of specialists of the Company and the Subsidiaries in international and other Anti-corruption events.
11. Combating bribery of foreign public officials and officials of public international organizations
11.1. Developing and approving local regulations on measures to combat bribery of public foreign officials (the procedure for employees to report cases of bribery of public foreign officials that become known to them, information to be reported to the Investigative Committee of the Russian Federation, and measures to combat bribery).
11.2. Engaging with representatives of governmental authorities and law enforcement authorities of the Russian Federation, diplomatic and trade representations of the Russian Federation abroad, and international and other organizations to develop and improve measures to combat bribery of foreign public officials and officials of public international organizations in international business transactions of the Company and the Subsidiaries.
11.3. Monitoring the effectiveness of measures taken to combat bribery of foreign public officials and officials of public international organizations.
12. Adoption, implementation analysis, and revision of the Anti-Corruption Policy
12.1. Monitoring of international standards, Russian Anti-Corruption Laws, and local regulations of the Company and its Subsidiaries on corruption prevention and combating.
12.2. Assessing the effectiveness of implementation of the Anti-Corruption Policy.
12.3. Revising and amending the Anti-Corruption Policy.