

Appendix
to Order of «Rosseti Lenenergo», PJSC
No. 279 dated May 20, 2021



PUBLIC JOINT STOCK COMPANY «ROSSETI LENENERGO»

ENTITY PROCEDURE

PR-12.04.05-001-2021

**Procedure for Keeping the List of
«Rosseti Lenenergo», PJSC Insiders and Notifying
Insiders about Their Inclusion in (Exclusion from)
the «Rosseti Lenenergo», PJSC List of Insiders**

Revision 1

St. Petersburg
2021

Foreword

1. DEVELOPED by the Shareholder and Investor Relations Division of the Department of Corporate Governance and Shareholder Relations, «Rosseti Lenenergo», PJSC.
2. APPROVED AND EFFECTED BY Order of «Rosseti Lenenergo», PJSC No. 279 dated May 20, 2021.
3. EFFECTED FOR THE FIRST TIME.

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1. Designations and Abbreviations

The following designations and abbreviations shall be used in the text hereof:

- DCG&SR standing for the Department of Corporate Governance and Shareholder Relations;
- DPM standing for the Department of Personnel Management and Organizational Design;
- Notification standing for the notification of the inclusion of a person in the list of insiders or the exclusion of a person from such a list.

2. General Provisions

2.1. In accordance with the legislation of the Russian Federation, «Rosseti Lenenergo», PJSC (hereinafter referred to as the Company) shall:

- keep a list of insiders;
- notify, in accordance with the applicable procedure, the persons included in the list of insiders about their inclusion in and exclusion from such a list;
- transfer the list of insiders in accordance with the applicable procedure to the trade organizer through which transactions with financial instruments, foreign currency and/or goods are carried out, at its request;
- transfer the list of insiders to the Central Bank of the Russian Federation (Bank of Russia) upon its request.

2.2. «Rosseti Lenenergo», PJSC shall keep a list of insiders as an issuer and as a person entitled to dispose of at least 25% of the votes in the supreme governing bodies of other issuers.

2.3. The Company's insiders include the persons listed in Appendix 1 to this Procedure.

2.4. Grounds for Including an Individual in the List of Insiders:

- entering into an employment (civil law) contract with a person (agreement on changing the terms of an employment (civil law) contract), providing for systematic access (access on a permanent basis) of the person to insider information;
- resolution on the election of a person to the position of the General Director, a member of the Board of Directors, a member of the Management Board, a member of the Internal Audit Board;
- resolution on the delegation of authority of the sole executive body to a managing entity and entering into an agreement with the managing entity;
- resolution on the election of a person to the positions of the governing and control bodies of the managing entity;
- serving a notification (including a preliminary one) to the Bank of Russia on sending a voluntary, mandatory or competing offer for the purchase of securities;

- entering into an agreement with a media agency on the basis of which the media agency will disclose information;
- providing the rating agency with access to insider information on the basis of an executed rating assignment agreement;
- performance by a Company employee of employment duties pertaining to the provision (receipt) of access to insider information on a permanent basis;
- temporary granting to a Company employee (receipt by a Company employee) of access to insider information in connection with the performance of certain employment duties.

2.5. Grounds for Excluding an Individual from the List of Insiders:

- dissemination, including disclosure, or provision of insider information in accordance with the securities legislation of the Russian Federation;
- entity's loss of the insider status, in particular, due to the termination of admission of issuer's financial instruments or goods to exchange trading in the Russian Federation;
- termination (amendment) of an employment or civil law contract, on the basis of or pursuant to which a person was granted access to insider information;
- termination of the performance by an entity employee of employment duties pertaining to the provision (receipt) of access to insider information;
- termination of powers of the General Director, a member of the Board of Directors, a member of the Management Board or Internal Audit Board;
- termination of powers of the managing entity that performed the functions of the sole executive body, and the powers of persons who are members of the governing and control bodies of such an entity;
- enforcement of an effective court decision on the exclusion of a person from the list of insiders of the entity;
- erroneous (illegitimate) inclusion of a person in the list of insiders of the entity.

3. Procedure for Notifying Insiders about Their Inclusion in (Exclusion from) the «Rosseti Lenenergo», PJSC List of Insiders

3.1. The Company shall send the Notification on the inclusion of a person in the list of insiders or on the exclusion of a person from such a list to a person included in the list of insiders of «Rosseti Lenenergo», PJSC or excluded from such a list, no later than seven (7) business days following the date of inclusion of this person in the list of insiders or the date of exclusion of this person from such a list, respectively.

3.2. The Notification shall be drawn up on paper, signed by an authorized person and endorsed with a seal.

If the Notification takes more than one sheet, all the sheets shall be bound and numbered, with a signature of the authorized person and a seal affixed to the binding.

3.3. Persons included in (excluded from) the list of insiders shall be notified by serving the Notification against the signature or by means of postal or electronic communication, which allows to reliably confirm the fact of sending the Notification.

Notifications may also be served by sending an electronic image of the document (an electronic digital form into which a document made on paper has been converted by scanning thereof) by electronic communication using the Internet.

4. Procedure for Keeping the «Rosseti Lenenergo», PJSC List of Insiders and Notifying Persons Included in or Excluded from the List of Insiders

4.1. The responsibility for keeping the list of insiders, transmission thereof to the trade organizer and to the Bank of Russia, as well as notifying persons included in and excluded from the list of insiders, shall be borne by the Department of Corporate Governance and Shareholder Relations of the Company.

4.2. The DPM and directors of «Rosseti Lenenergo», PJSC branches shall inform the DCG&SR about the need to include Company employees who fall under Categories 2, 3 of Appendix 1 hereto in the list of insiders and/or exclude them from such a list, within three (3) business days from the date of entering into employment contracts with newly hired employees, addenda or agreements on the termination of employment contracts.

4.3. The heads of the responsible business units of «Rosseti Lenenergo», PJSC shall, within three (3) business days following the date of occurrence of the grounds for including a person in the list of insiders provided for in Clause 2.4 hereof, or the grounds for excluding a person from the list of insiders provided for in Clause 2.5 hereof, ensure that the relevant information is sent to the DCG&SR.

4.4. Business units shall ensure that the DCG&SR is informed by sending a memo signed by the responsible head with the attachment of the Form of the List of Insiders in accordance with Appendix 2 hereto.

4.5. The DCG&SR shall within two (2) business days following the date of receipt of the relevant information ensure the inclusion (exclusion) of the person in (from) the list of insiders.

4.6. The DCG&SR shall within seven (7) business days from the date of inclusion (exclusion) of a person in (from) the list of insiders ensure that the Notification is sent to the specified person in accordance with the requirements of the legislation of the Russian Federation and this Procedure.

4.7. The DCG&SR shall transmit the list of insiders to the trade organizer and to the Bank of Russia in pursuance of their requirements in accordance with the procedure and terms stipulated by the legislation of the Russian Federation.

«Rosseti Lenenergo», PJSC Insider Category Types

The «Rosseti Lenenergo», PJSC insiders are persons defined as falling into the following categories:

Category 1 includes the following persons:

- The sole executive body of the Company or the person acting as such;
- The sole executive body of the managing entity or the temporary sole executive body and other persons holding positions in the governing and control bodies of the managing entity;
- Company's Management Board members;
- Company's Board of Directors members;
- Company's Board of Directors committee members;
- Company's Internal Audit Board members.

Category 2 includes those Company employees who have access to the Company's insider information, including the information listed in the Appendix to «Rosseti Lenenergo», PJSC Order No.185 On Approval of the List of Insider Information of «Rosseti Lenenergo», PJSC dated April 02, 2021, and/or to whom the Company's insider information is transmitted. Such employees include:

- First Deputy General Director - Chief Engineer / Acting First Deputy General Director - Chief Engineer;
- Deputy General Directors / Acting Deputy General Directors;
- Assistants and Advisers to the General Director / Advisers to the Deputy General Director;
- heads of stand-alone business units;
- heads and deputy heads of branches and representative offices of the Company;
- Chief Accountant - Head of the Accounting and Tax Accounting and Reporting Department of the Company and Deputy Chief Accountants of the Company;
- Chief Specialists of the Managers Work Arrangement Sector and assistant to directors and heads of the Company's business units.

Category 3 includes the following persons:

- heads of the Company's business units (departments, divisions, etc.);
- Company employees responsible for performing the following functions:
 - business planning, analytics, budgeting and management accounting;

- RAS and IFRS bookkeeping and financial accounting;
- tax accounting and reporting;
- internal audit, arrangement of internal control and risk management;
- strategic development of the Company;
- economic and information security;
- corporate governance and shareholder relations of the Company;
- organizational support of the Board of Directors and the Management Board of the Company;
- information policy and public relations;
- personnel management and corporate development;
- legal support;
- property and asset management;
- planning and implementation of investment programs, allocation of sources of finance for investment programs, capital construction and repair activities;
- tariff policy, liaison with regulatory authorities, electricity market participants, customers, ensuring transmission of electricity and power supply, grid connection, technical development and innovation;
- automated management systems, software administration, IT security;
- operational and technical management, emergency prevention;
- document management, case file management and record keeping;
- and other categories of Company employees who, by virtue of their official duties, have access to the Company's insider information;

Category 4 includes individuals who have received access to insider information by virtue of their official duties on the basis of civil-law contracts entered into with them and are not included in the 1st and 2nd Categories of insiders, including a representative of a member of the Company's Board of Directors.

Category 5 includes persons who have access to insider information in accordance with Clauses 5, 6, 8, 11 and 12, Article 4 of Federal Law No. 224-FZ On Countering the Unlawful Use of Insider Information and Market Manipulation and on Amendments to Certain Legislative Acts of the Russian Federation dated July 27, 2010. Such persons include:

- information agencies that disclose or provide the Company's insider information;
- rating agencies that assign ratings to the Company and securities;
- auditors;
- consulting companies;
- appraisers;
- professional participants of the securities market;
- credit institutions;

- insurance institutions;
- persons having access to information about sending a voluntary, mandatory or competing offer to purchase shares in accordance with the legislation of the Russian Federation on joint-stock companies, including persons having sent voluntary or competing offers to the Company;
 - persons who, by virtue of holding shares in the authorized capital of the Company, have access to insider information on the basis of federal laws or constituent documents of the Company;
 - and other persons who have received access to insider information.

Form of the List of Insiders

Individuals											
No.	Date of inclusion	Grounds for inclusion¹	Date of exclusion²	Grounds for exclusion	Full name	Date of birth	Place of birth	Address	Document series and number	Issued by and on	Position

Legal entities								
No.	Date of inclusion	Grounds for inclusion	Date of exclusion	Grounds for exclusion	Full corporate name	Taxpayer identification number (TIN)	Primary state registration number (PSRN)	Address

¹ Specify the number of Clause of Article 4 of Law No. 224-FZ, as well as the grounds for inclusion in the list of insiders

² Specify the number of Clause of Article 4 of Law No. 224-FZ, as well as the grounds for inclusion in the list of insiders

Keeping the List of Insiders Process Responsibility Matrix

Line of business/Function/Operation	Roles of participants				
	DCG&SR employee/head	Heads of business units	Company insider	DPM, branch directors	Regulatory authorities/trade organizer
Determination of the need to include persons in the list of insiders and exclude them from such a list in accordance with the grounds set out in Clauses 2.4., 2.5. of the Procedure	-	D, R		D, R	-
Sending information about the occurrence of grounds for including a person in the list of insiders or grounds for excluding a person from the list of insiders	N	D, R	-	D, R	-
Keeping the list of insiders of the Company	D/R	-	-	-	-
Transfer of the list of insiders to the trade organizer / Bank of Russia	D/R	-	-	-	I/N
Notification of persons included in the list of insiders and excluded from such a list	D/R	-	N	-	-

Abbreviations used in the Roles of Participants column:
R - responsible person

N - notified person
I - initiator
C - coordinator
A - approving person
D - designated person