

ANTI-CORRUPTION POLICY AND ENFORCEMENT OF ECONOMIC SECURITY OF OPERATIONS

The anti-corruption policy of PAO Rosseti and its subsidiaries is a single strategic document of PAO Rosseti and its subsidiaries that defines the single approach of the Rosseti Group to elaboration and implementation of measures to prevent and combat corruption. The goal of the anti-corruption policy is a single approach to implementation of the Federal Law³⁹, with regard to elaboration and implementation of measures to prevent and combat corruption: exposure and subsequent elimination of corruption factors (corruption prevention); exposure and prevention of corruption-related and other offences; mitigation and (or) liquidation of consequences caused by corruption-related and other offences, as stated in the Russian Administrative Offence Code⁴⁰.

Section "Anti-corruption Policy" of the corporate web-site discloses information on corruption-related whistleblowing procedures, available whistleblowing communications means, regulatory documents on combating corruption and complete version of the Company's Anti-corruption Policy, Anti-corruption Charter and Certificate on accedence of the Company to the Anti-corruption Charter of the Russian Business.



The Company has the following system for conflict-of-interest disclosures:

- initial disclosure on possible conflicts of interest at hiring or position change
- annual conflict-of-interest disclosures at the year-end (declaration campaign)
- notification from employees on personal interest that arises during the conduct of official duties and leads or may lead to the conflict of interest

Initial disclosure on possible conflicts of interest helps check information, declared by a candidate applying for a position, and prepare a post-check report, thus preventing occurrence of new, previously unrecorded, pre-conflict situations. During the reported period the Company examined and checked 3,355 job seekers whether they have pre-conflict of interest or not at hiring or position change. 10 pre-conflict situations related to direct reporting line among employees with kin relations were exposed. The Company conducted annual conflict-of-interest declaration campaign for employees of PAO Rosseti Ural and its affiliates (AO EESK and AO EES) in full, using electronic declaration system "Automated system for analysis and collection of information on beneficiaries". 7,068 Company's employees, incl. affiliates' employees, filed declarations, with 9 pre-conflict situations exposed after the 2022 declaration campaign. Results of the 2022 declaration campaign were examined and settled by the Company's panel, liable for compliance with corporate ethics norms and settlement of competing interests.

The Company has the following channels for whistleblowers:

- Hotline (+7 343 2932183), disclosed on the corporate web-site, works 365/7/24 in automatic mode, with an option of recording voice messages
- Feedback form, disclosed on the corporate web-site, works in automatic mode, with an option of sending text messages and evidence, anonymity guaranteed

We also placed detailed information about all available channels for corruption whistleblowing on information stands in HQ, executive offices in branches, affiliates and customer service centers. In 2023, our hotline received 78 messages (63 anonymous), although only 11 messages contained information on potential corruption behavior.

Experts from the relevant unit of the Company conduct examinations of bids received from procurement participants in terms of full disclosures, integrity, affiliation, competing interests, pre-conflict situations and other abuses related to occupied positions. During the reported period, 2,412 procurements were examined, with 7,025 procurement participants scrutinized. 131 negative opinions were prepared after examinations. Upon resolutions of the security department 16 procurements worth RUB 46 million were cancelled due to non-compliance of all tender participants with the tender documentation requirements and anti-corruption standard on procurements.

PAO Rosseti Ural participates in group initiatives related to corruption prevention, in particular, in 2015, the Company acceded to the Anti-corruption Charter of the Russian Business. Accedence to the Charter and gradual implementation of its statements are confirmation of Company's voluntary liability to improve anti-corruption measures, stipulated by international legal standards and Russian laws on corruption prevention and fight against corruption.