

ANTI-CORRUPTION POLICY OF THE COMPANY

The Anti-Corruption Policy of Rosseti PJSC and its S&As sets forth a consistent approach to compliance with Clause 13.3 of Federal Law No. 273-FZ dated 25 December 2008 on combating corruption in part that concerns the Company’s obligations to develop and put in place measures to prevent and combat corruption, including:

- Identification and further elimination of causes of corruption (anti-corruption)
- Identification, prevention and suppression of corruption and sundry offences
- Minimisation and (or) liquidation of the consequences of corruption and sundry offences

In 2024, an amended version of the Anti-Corruption Policy of Rosseti Kuban¹ was introduced and an anti-corruption plan for 2024 was approved.

Focus areas of the Company’s Anti-Corruption Policy and the measures taken to deliver them

Focus area	Measures taken in 2024
Establishment of the inner control and risk management process to prevent and combat corruption	<p>Reports on the results of anti-corruption monitoring for 2023 and the first six months of 2024 were prepared and forwarded to the Management Board, the Audit Committee and further to the Board of Directors of the Company for review. The reports were reviewed and taken under advisement by the Audit Committee and the Board of Directors of the Company unconditionally.</p> <p>The second line of defence report for 2023, along with the results of self-assessment of control procedures efficiency and quarterly updated passports of functional risks, business process risks, and progress report on the risk management action plan for the anti-corruption sub-process were prepared and forwarded to the Company’s management.</p>
Identification and clearing of conflict of interests	<p>Annual declaration of conflicts of interest by employees for 2023 was completed:</p> <ul style="list-style-type: none"> • Declarations were submitted by 2,469 employees. During the 2023 declaration campaign, no cases of conflict of interest or pre-conflict situations were identified. <p>Corporate Ethics Compliance and Conflict of Interest Commission had two meetings.</p> <p>They reviewed the submitted statements of income, property and property liabilities born by the top managers or their immediate family members in 2023. As a result, no signs of affiliation, conflict of interest, or pre-conflict cases were identified.</p> <p>Conflicts of interests were declared for candidates for vacant positions at the Company. In 2024, 247 opinions were issued on the screening of candidates applying for vacant positions at Rosseti Kuban PJSC, 64 of which were negative.</p>
Development and introduction of standards and procedures to ensure good practice	<p>In 2024, agreements on compliance with the requirements of the Anti-Corruption Policy and the Code of Corporate Ethics and Conduct of Employees were obtained from 100 new hires of the Company’s Executive Office.</p> <p>The Company developed and approved nine organisational decrees on anti-corruption compliance and the implementation of its Anti-Corruption Policy.</p>

¹ Published on Rosseti Kuban’s website in the [About the Company / Anti-Corruption Policy](#) section.

Focus area	Measures taken in 2024
Review and verification of reports of possible corruption and sundry abuses	<p>In 2024, the Company received four reports of possible corruption and other abuses via the feedback form in the Anti-Corruption Policy section of Rosseti Kuban’s website.</p> <p>The Company carefully looked into every such report. Based on the results of the examinations of the reports, the information contained therein was not confirmed.</p>
Anti-corruption measures in interaction with partners and subcontractors	<p>Data on concluded contracts, additional agreements and subcontractors of the Company’s counterparties were entered daily into an automated system for analysing and collecting information on beneficiaries. In 2024, over 71,000 contracts and additional agreements were uploaded.</p> <p>The procurement documentation underwent the approval procedure. In 2024, we participated in 798 procurement procedures. The initial (maximum) price was reduced by a total of RUB 6.02 million under nine procurement procedures. Four procurement procedures worth RUB 194.45 million were cancelled.</p> <p>More than 7,300 agreements submitted for procurement procedures include an anti-corruption clause and a beneficiary disclosure obligation for the counterparty.</p>
Combating bribery of foreign public officials and officials of public international organisations	<p>In 2024, the Company did not receive any requests from representatives of state authorities and law enforcement agencies of the Russian Federation, international and other organisations regarding the prevention and control of bribery of foreign public officials and officials of public international organisations.</p>
Legal education and building the basics of law-abiding behaviour among employees. Employee counselling and training	<p>The Company continuously updates its legal framework and takes all the necessary measures and anti-corruption procedures to instil zero tolerance to corruption in its employees.</p> <p>Over 2024, 908 employees of the Executive Office and branches of Rosseti Kuban PJSC underwent entry training under a programme on preventing and combating corruption.</p> <p>The Company modified its Territory without Corruption stand to increase the efficacy of awareness, education, and other initiatives designed to combat corruption.</p> <p>Along with the representatives of the Corporate Governance Department and Security Department, the representatives of the Company participated in the meetings of the working group, in the meeting of the Rosseti Central Commission on Compliance with Corporate Ethics and Conflict of Interest Resolution, as well as in the end-of-year meeting</p>

For 2025, the Company scheduled to approve and put in place its annual anti-corruption plan and to enhance the following mechanisms.



Identification and clearing of conflict of interests



Compliance with anti-corruption procurement standards



Prevention of corruption in interaction with partners and subcontractors