#### PUBLIC JOINT-STOCK COMPANY OF POWER INDUSTRY AND ELECTRIFICATION OF KUBAN (KUBANENERGO PJSC)



Approved by
The resolution of the Board of Directors of
Kubanenergo PJSC
on 30.03.2018
(minutes of meeting No.305/2018 dd. 02.04.2018)

## The Regulations on Information Policy of Kubanenergo PJSC

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#### Information on the document

Brought into force by	The Order of the Director General of Kubanenergo PJSC on20#	
Drawn up by	The Corporate Governance and Shareholder Relations Department, Kubanenergo PJSC	
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Reason for new edition	Changes in the Federal Law #208-FZ "On Joint-Stock Companies" from 26.12.1995	
Application	This Policy applies to all departments and employees of the Company	
Safekeeping of document	The original document is kept at Division for Documents Support and Control of Assignments under the Administrative Department of the Executive Office of Kubanenergo PJSC	
Amendments	The documents shall be amended as and when necessary	
Keywords	Company, internal documents of the Company, affiliated and dependent companies, parties/persons interested in information disclosure (interested persons), information disclosure, investment professionals, insider information, information policy, classified information, trade secrets, cross-shareholdings, controlled person (controlled entity), rumors, material event	
Related organizational	-	
and executive		
documentation and		
local normative		
document		

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#### 1. Purpose

These Regulations on Information Policy of Kubanenergo PJSC (hereinafter – the Regulations, Information Policy) are drawn up in accordance with the Federal Law No.208- FZ "On Joint Stock Companies" from 26.12.1995, the Federal Law No. 39 - FZ "On the Securities Market" from 22.04.1996 and other normative legal acts of the Russian Federation, the Code of Corporate Governance, recommended for use by the Bank of Russia, the Charter and internal documents of the Company as well as the rules established by the organizers of trade (stock exchange) where shares of the Company are traded, Russian and international corporate governance practices.

- 1.2. These Regulations represent an in-house document of the Company which sets the principals, goals and tasks of information policy, rules and approaches to information disclosure, the list of information and documents subject to disclosure to the shareholders and other interested entities, and determines the order and terms of information disclosure and provision.
- 1.3. Target audience for this Policy:
- the Company's shareholders and their representatives
- regulatory and administrative authorities
- the Company's customers
- the Company's contractors
- companies functioning as market regulators
- members of the Company's management and control bodies

- investment professionals
- mass media
- the Company's employees

#### 2. Normative references

#### Absent

#### 3. Definitions and abbreviations

The following terms and abbreviations are used in the Regulations:

Company's	internal
documents	

documents prepared and approved by the management of the Company in accordance with the competence defined by the legislation of the Russian Federation and the Company's Charter, regulations establishing the norms (rules) of general nature intended to regulate the administrative, financial, commercial, industrial, economic, personnel and other functional activities within the Company.

# Parties/persons interested in disclosure of information

- the Company's shareholders and their representatives
  - regulatory and administrative authorities
  - the Company's customers
  - the Company's contractors
  - companies functioning as market regulators
  - members of the Company's management and control bodies
  - investment professionals
  - other participants of securities market
  - the Company's employees

### Investment professionals

 Investors, analysts, professional participants of the securities market, rating agencies, specialists and consultants in finances and investments.

#### Insider information

trustworthy and specific information that was not disclosed or provided (including trade secret, business secret and other secrets protected by the law), and disclosure or provision of which may have material impact on prices of the Company's financial instruments and information that is recognized as included in the list of insider information of the Company

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 A set of core principles and measures used by the Company to observe the rights of all interested parties to have access to trustworthy and objective information about the Company in amount necessary for making balanced investment and management decisions as well as strengthening of business reputation

Trade secret

 non-disclosure requirements that allows the holder of information under the existing or possible circumstances to increase revenue, avoid unreasonable expenses, maintain the status at market and get other commercial benefit.

Confidential information

 information covered by requirement not to transfer such information to third parties without consent of its owner.

Company

 Public joint-stock company of power industry and electrification of Kuban (Kubanenergo PJSC)

Cross-shareholding

 ownership of shares in the Company on the part of a subsidiary and/or dependent company.

Controlled entity (company)

a legal entity under the direct or indirect control of a controlling entity (an entity that has the right to directly or indirectly (through entities under their control) dispose of by virtue of participation in a controlled organization and (or) on the basis of trust management agreements, and (or) partnership and (or) appointment, and (or) shareholder agreement, and (or) other agreement, the subject of which is the exercise of rights certified by shares (parts) of the controlled organization, more than 50 percent of the votes in the supreme body of the controlled entity or the right to appoint (elect) the sole executive body and (or) more than 50 percent of the collegial body of controlled entity).

Disclosure of information

 provision of access to information to all interested parties regardless the purpose of obtaining the required information in accordance with a procedure which guarantees its presence and receiving.

**Rumors** 

 unverified information from an unknown source, based on actual or fictitious events that is not sufficiently reliable to make informed decisions. Material fact

facts that may have a material effect on the Company's activities or the value of the Company's securities in case of their disclosure.

The following abbreviation is used in three Regulations:

**SDCs** 

legal entities, where the Company owns more than 20 percent of the voting shares, or by virtue of the prevailing interest in the chartered capital, or according to the signed contract, or otherwise has the power to determine the decisions taken by such legal entities

#### 4. Regulatory frameworks

#### 4.1.Goals and objectives

The main goals and objectives of these Regulations are:

- establishment of the principles for disclosure of obligatory and optional information that would increase transparency of the Company
- compliance with the requirements of legislation and market regulators of the Russian Federation pertaining mandatory disclosure of information by a joint-stock company
- ensuring the timely and full disclosure of up-to-date and objective information about the Company that provides possibility for shareholders and investors to adopt balanced decisions
- protection of the rights and legitimate interests of the Company's shareholders
- refinement of the Company's corporate governance and contribution to enhancement of its investment attractiveness
- strengthening of business reputation and forming of positive opinion about the Company among the target audience
- strengthening of business relations between the Company and its contractors.

#### 4.2. Transparency principals

- 4.2.1. The Company discloses material information on the principles of regularity, consistency and efficiency, accessibility, completeness, trustworthiness and comparability.
- 4.2.2. In accordance with the principles of regularity, consistency and efficiency, the Company ensures:
  - implementation of requirements of the RF legislation, market regulators, internal documents of the Company related to information disclosure
  - continuity of information disclosure
  - disclose of information at the earliest possible moment
  - quick response to rumors and fraudulent information that displays wrongheaded view of the Company's evaluation and the cost of its securities.

- 4.2.3. To observe the principle of accessibility of information, the Company uses channels and ways to distribute information on its activities that are available to majority of interested entities and provide free, easy and nonselective access to the disclosed information.
- 4.2.4. Following the principles of completeness, trustworthiness and comparability of disclosed information, the Company strives to:
  - provide complete, objective, factually accurate information to interested parties and face up disclosure of negative information as well
  - disclose clear and consistent information not confronting itself
  - ensure neutrality of disclosed information (detachment of information from interests of any persons or groups of persons)
- 4.2.5. When providing information, the Company strives to ensure reasonable balance of interests of shareholders and the Company itself as it is interested in keeping confidential the important business information that may have material impact on the Company's competitive position.
- 4.2.6. The Company maintains high standards of corporate and social responsibility and keeps the dialogue running with target audience to strengthen corporate reputation and growth of fair value of business.

#### 4.3. Means and methods of information disclosure

- 4.3.1. Disclosure of information is one of the most important instruments of interaction with shareholders, investors and other interested parties; it helps build lasting relationship and trust as well as increase investment attractiveness of the Company.
- 4.3.2. The Company discloses information in Russian and English languages in all cases covered by current legislation and when it does not contradict the subject of disclosure in particular case (interview, public speech in conditions that exclude simultaneous interpreting, etc.). The Company strives to synchronize disclosure of information in Russian and English languages.
- 4.3.3. When disclosing information, the Company uses all available means of its distribution.
- 4.3.4. The Company discloses information by means of:
- 4.3.4.1 Disclosure in news feed of authorized news agencies and information systems of foreign countries, on webpage provided by information agency

In accordance with the Regulations on disclosure of information by issuers of securities, approved by the Bank of Russia on 30.12.2014 by order #454- $\Pi$ , the Company posts information on web recourse updatable in real-time and provided by information agency (newsfeed) in amount and within period stipulated by the RF legislation. The Company publishes information in the news feed of "Interfax" agency at <a href="http://www.e-disclosure.ru">http://www.e-disclosure.ru</a>.

If depository receipts have been admitted to trades (listed) at other foreign stock exchanges, the Company will disclose information in accordance with procedure, deadlines and form set by the requirements of the trading platform and applicable laws.

The Company guarantees that it will provide information statements in Russian and English languages on the main events of its activity by means of email to investment community and mass media after official disclosure of the information in the newsfeeds of information agencies.

The Company uses webpage of information agency "Interfax" to post on the Internet (except publications in news feed) information that is mandatory for disclosure as per legislation of the Russian Federation. The Company's webpage on "Interfax": <a href="http://www.e-disclosure.ru/portal/company.aspx?id=2827">http://www.e-disclosure.ru/portal/company.aspx?id=2827</a>.

The Company may publish information in the news feed and use webpage of other information agency which is duly authorized by the Bank of Russia to disclose information on securities and other financial instruments.

4.3.4.2 Disclosure of information on the official website of the Company

The Company publishes on the official web site the information about its activity, the activity of its SDCs, as well as documents, press releases, presentations, messages, reports, news, articles, interviews, FAQ for investors and other information stipulated by the RF legislation, internal documents of the Company, as well as information corresponding to the best practices of corporate governance in the Russian Federation and abroad. The website has Russian and English versions. Address of the official website of the Company: <a href="http://kubanenergo.ru/">http://kubanenergo.ru/</a>.

4.3.4.3 Publication in official printed media.

The Company mandatory discloses information in printed media in cases covered by the RF legislation and the Company's internal documents.

The Company publishes notices, articles, interviews, materials and other information in printed media, distributed across the Russian Federation, as well as abroad as the need arises in such publication

4.3.4.4 Publication of information in brochures and booklets.

The Company prints (in form of brochures, booklets, etc.) its annual reports and information on the Company at print shop or uses other ways of publishing.

4.3.4.5 Telephone conferences and meetings, responses to requests from investment community

The Company regularly convenes meetings with representatives of investment community, participates in Russian and international conferences.

Representatives of the Company participating in events that stipulate the disclosure of information about activities of the Company, as well as the theme of disclosed information are determined by the head of the structural unit of the Company, who was invited to participate in this event, in agreement with corporate governance and shareholder relations department and public relation department.

The Company ensures regular disclosure of information: notification of shareholders and investors on the results of its activity and plans so that they can make a balanced decision concerning the Company's securities.

The Company sends messages, uses hot line and seeks feedback from investment professionals.

The authorized representatives of the Company (employees of the Company) participating in activities requiring the disclosure of information about the activities of the Company are responsible for the public disclosure of information (speeches,

comments, interviews, publications etc.) that contains state or commercial secret, confidential and insider information.

4.3.4.6 Interviews, briefings and press conferences with the managers of the Company, comments and responses to questions from representatives of mass media The Company organizes press conferences, briefings on important events that are taking place or will take place in the Company. The Company's structural unit responsible for public relations distributes official comments for mass media on activities and prospects of the Company, response to inquiries from mass media.

The Company sends new letters in Russian and English languages about its activity by email upon the request from investment community and mass media.

4.3.4.7 Provision of information to the organizers of trade at the stock market (stock exchange)

In order to keep securities in quotation lists of the Russian exchanges, the Company provides reports on compliance with the norms of corporate governance, as well as other information and documents in accordance with the Listing Rules (the admission of securities to trading) and requirements of the RF legislation and the Bank of Russia. If the Company receives and inquiry from trade organizer, the Company will provide information in accordance with procedure and terms set by the RF legislation.

4.3.4.8 Provision of access to the Company's documents

The Company grants shareholders and other interested persons an access to information and documents of the Company as well as copies of such documents upon written request in the cases provided for by the RF legislation and the Company's internal documents.

4.3.4.9 Official pages of the Company at social networks and blogosphere

To the dialogue with community running the Company has accounts at social networks and keeps blogs.

Information support of the Company's activity at social networks and blogosphere is maintained by the specialists from public relations department in accordance with the internal documents of the Company.

4.3.4.10 Provision of information to the Company's employees

The Company on a regular basis informs its employees on its activity and development as well as managerial decisions. The employees receive information for internal use as well as public information and improve their knowledge of the Company and its SDCs.

### 4.4. Provision of access to shareholders and other interested persons/entities to information and documents on the Company's activity

- 4.4.1. Information on the Company's activity is provided in accordance with the RF legislation the Company's internal documents.
- 4.4.2. The legislation provides different scope of rights on access to documents and information of the Company depending on the percentage of the company's voting shares owned by a shareholder. The shareholders having equal scope of rights shall be provided equal access to the Company's documents.

- 4.4.3. The Company provides access to disclosed information within the period set by the RF legislation, the Company's Charter and other internal documents of the Company.
- 4.4.4. Access to shareholders and other interested persons/entities to information and documents on the Company's activity shall be provided be means of:
  - official response to individual requests/requirements;
  - provision of copies of documents upon requirements;
  - provision of access to documents for familiarization at the premises of the executive office of the Company (at the address of the executive body of the Company);
  - publication of information and documents on the Company's official website of the Internet;
  - sending of information electronically via the Internet, provided that this does not contradict the current legislation.
  - hotline for shareholders and customers;
  - answers to questions at the General Meeting of Shareholders of the Company;
  - organization of a forum for shareholders on the agenda of the General Meeting of Shareholders.
- 4.4.5. The Company provides to shareholders the documents and (or) their copies that are considered as information subject to provision to shareholders in accordance with the legislation on the basis of written requests. The Company strives to provide information and (or) copies of documents that are related to information of controlled entities that is subject to provision to shareholders in accordance with the legislation under the procedure and terms set by the legislation and taking into account the time for obtaining the information from such controlled entities.

In order to provide the shareholders with the necessary information about the legal entities controlled by the Company, the Company makes the necessary efforts to obtain such information from the relevant controlled entity.

The Company provides copies of documents in the form of their storage by the Company and/or controlled entities.

If a shareholder's request shows signs of abuse of rights on access to information of the Company and/or controlled entity, the Company has the right to raise objections against fulfillment of shareholder's demands by sending of a reasoned refusal.

4.4.6. The Company charges a fee for copies of the requested documents, not exceeding the cost of their production.

Calculation of costs for replicating documents upon the request of shareholders and requisites for payment are posted on the official website of the Company and on the webpage provided by the news agency.

If a person did not pay for the expenses of the Company for making copies of documents on received and fulfilled demand, the period for providing copies of the Company's documents according to the subsequent requirements of the said person shall be calculated from the date of receipt of such payment

4.4.7. If the Company received a request (several simultaneous requests) on production of big amount of documents (more than 10 documents and (or) more than

200 pages), the Company has the right to extend the period for the provision of such documents, but not more than twenty business days with submission of simultaneous notification of such extension and its reasons to the person who sent the relevant request.

If there is a requirement to provide documents for familiarization or provide copies of documents of typos and other insignificant shortcomings, the Company does not refuse to satisfy such demand. If there are significant shortcomings that do not allow the Company to satisfy the shareholder's demand, the Company shall notify the interested person about them and provide an opportunity for their correction.

4.4.8. In order to maintain the balance of interests of shareholders and the economic safety of the Company, the Company's internal documents stipulate a regime of confidential information, as well as commercial secrets.

Documents containing confidential information, as well as commercial secrets, are provided to shareholders on condition of signing of an agreement on non-distribution of information (confidentiality agreement).

The term for the performance of the obligation to provide documents containing confidential information is counted not earlier than from the date of signing an agreement on non-distribution of information (confidentiality agreement) between the Company and the shareholder (representative) that applied for access to the documents.

The terms and the form of the agreement on non-distribution of information (confidentiality agreement) are unified for all shareholders and posted on the Company's official website on the Internet, as well as on the Company's webpage provided by the news agency.

If a group of shareholders requests such information, this agreement must be signed by each of them, and when providing access to documents to a shareholder's representative by proxy – both by the shareholder and their representative.

4.4.9. The Company grants members of the Board of Directors the access to documents and information necessary for performance of their duties, including information on entities controlled by the Company that was provided to the Company by controlled entities in accordance with the legislation of the Russian Federation.

Presence of confidential information requested by a member of the Board of Directors, including those constituting a trade secret, cannot prevent from being provided to a member of the Board of Directors. A member of the Board of Directors has a duty to maintain the confidentiality of information.

Members of the Board of Directors of the Company bear personal responsibility in accordance with the legislation of the Russian Federation for non-observance of the confidentiality of information established by the Company.

4.4.10. Information on the Company and its activities is provided to interested persons who are not shareholders of the Company and representatives of the media upon their written requests, if such information does not contain a state, commercial or other secret protected by law and is not insider information.

#### 4.5. Disclosure of information by officials of the Company

- 4.5.1. Collection, preparation and disclosure of information about the Company's activity are carried out by the officials, whose function is to disclose information, in accordance with the Company's internal documents.
- 4.5.2. Chairperson of the Board of Directors and members of the Board of Directors, Director General, Head of Public Relations Department and authorized representatives under the resolution of the Director General have the right to publicly comment on the Company's activity.
- 4.5.3. The persons specified in paragraph 4.5.2 of these Regulations have the right to comment on the activities of the Company within their competence, taking into account restrictions on disclosure of information containing state, trade secrets, confidential or insider information.
- 4.5.4. The Chairman of the Board of Directors, or an authorized member of the Board of Directors, may officially comment on decisions taken by the Board of Directors, and also state their point of view on issues discussed at the meetings of the Board of Directors, taking into account the restrictions on disclosure of information containing state, commercial secrets or confidential and insider information.

If information on decisions of the Board of Directors of the Company is subject to mandatory disclosure in accordance with the legislation of the Russian Federation, the Chairperson of the Board of Directors, or an authorized member of the Board of Directors, comment on decisions taken at the meeting after the official disclosure of this information in the manner and within the time limits stipulated by the legislation of the Russian Federation.

- 4.5.5. The persons specified in clauses 4.5.2 and 4.5.4 of these Regulations do not comment and do not answer questions regarding financial results and indicators of the Company prior to their official disclosure in accordance with the legislation of the Russian Federation.
- 4.5.6. Chairpersons of the Committees under the Board of Directors, members of the Committees and authorized persons of the Company shall be entitled to comment on and provide the interested parties with information on decisions taken at meetings of the Committees, guided by the principles of reasonableness and responsibility, as well as taking into account restrictions on disclosure of information containing state, commercial secret, confidential or insider information.
- 4.5.7. The persons specified in clauses 4.5.2, 4.5.4 and 4.5.6 are answerable to the Company for disclosure of confidential and insider information in the manner and in the amounts established by the legislation and internal policies and procedures of the Company.

#### 4.6. List of disclosed information

4.6.1. The Company shall compulsorily disclose information stipulated by the RF legislation on the securities market.

The procedure and terms for the disclosure of mandatory information by the securities' issuer is stipulated by the RF legislation on the securities market.

- 4.6.2. To ensure a high degree of transparency and follow the best practices of corporate governance, the Company additionally discloses the following information on its official website at <a href="http://kubanenergo.ru/">http://kubanenergo.ru/</a>:
- 4.6.2.1. Company's history, corporate values
- 4.6.2.2. Mission, goals and strategy of the Company
- 4.6.2.3.Information on organization and general principles of corporate governance applied in the Company
- 4.6.2.4. Information on the Registrar of the Company and on the transfer-agents of the Registrar of the Company
- 4.6.2.5.Information on the Company's share capital, including information on share issues
- 4.6.2.6.Statistic information on shareholders of the Company, including number of shareholders, ratio and share of non-residents and residents, legal and natural persons in the authorized capital
- 4.6.2.7.Information on nominal value and number of issued and put into circulation ordinary and preference shares
- 4.6.2.8. Information on shares of the Company in cross shareholding
- 4.6.2.9.Information on shareholders owning 5% or more of the Company's voting shares, including statement on absence of information about existence of these shareholders, except those already disclosed
- 4.6.2.10. Information on companies in which the Company holds more than 5% of voting shares
- 4.6.2.11. Information on changes in the degree of control over controlled entities
- 4.6.2.12. Dynamics of the Company's share price
- 4.6.2.13. Forecast of share prices of the companies of the distribution grid complex and recommendations of analysts;
- 4.6.2.14. The main production and economic indicators, including indicators of revenues, costs and profits of the Company and its SDCs
- 4.6.2.15. Consolidated financial statements prepared in accordance with the International Financial Reporting Standards (IFRS)
- 4.6.2.16. Information on transactions with related parties in accordance with the criteria established by IFRS
- 4.6.2.17. Information on material transactions, including intra-corporate transactions, transactions of the Company with its shareholders holding at least 5% of the Company's voting shares
- 4.6.2.18. Dividend history
- 4.6.2.19. Investments and innovations of the Company and its SDCs
- 4.6.2.20. Information on the procedures for nominating candidates to the Board of Directors of the Company, procedures for convening meetings, procedures for submitting questions to the agenda of the annual and extraordinary General Meetings of Shareholders
- 4.6.2.21. Information on shareholders' meetings, including additional materials for meetings of shareholders, including information on candidates for auditors (name of self-regulatory organization of auditors wherein the candidate is a member; description of procedures for selecting an auditor, information on proposed

remuneration, other material terms of the contract with the auditor) and minutes of the General Meetings of Shareholders of the Company

- 4.6.2.22. Information on members of the Board of Directors, members of the Management Board, the Director General, the Corporate Secretary, in particular brief biographical information: age, education, qualifications, experience, main place of work, other positions held, information on the time of joining the management body of the Company (election)<sup>1</sup>
- 4.6.2.23. Information about loss of the status of an independent director by a member of the Board of Directors;
- 4.6.2.24. Minutes of meetings of the Board of Directors of the Company
- 4.6.2.25. Information on composition of the Committees under the Board of Directors of the Company, indicating the Chairperson and independent directors in the Committee
- 4.6.2.26. Results of meetings of the Committees under the Board of Directors of the Company, including information on the form of meetings of the Committees and information on presence of members of the Board of Directors at meetings of the Committees under the Board of Directors of the Company
- 4.6.2.27. Information on composition of the Audit Commission of the Company and the total amount of remuneration payable to members of the Audit Commission
- 4.6.2.28. Information on the Company's auditor, including information on the license, criteria and method for selecting the auditor, the amount of the auditor's remuneration for audit services and services not directly related to the audit;
- 4.6.2.29. Procedure for interaction between the Company and businesses, whose shares (stakes) the Company owns
- 4.6.2.30. Regulations on the Committees under the Board of Directors of the Company
- 4.6.2.31. Regulations on the Company's Dividend Policy
- 4.6.2.32. Information policy
- 4.6.2.33. Regulations on the Company's Insider Information
- 4.6.2.34. Environmental Policy
- 4.6.2.35. Regulations on the procedure for scheduled purchases of goods, works, services;
- 4.6.2.36. Other internal documents approved at the Company
- 4.6.2.37. Information on determining the principles and approaches to the organization of the risk management and internal control systems in the Company
- 4.6.2.38. Information on significant risks that may affect the Company's acuity
- 4.6.2.39. The results of technical audit, audit of quality control systems, the results of certification of the quality management system for compliance with international standards
- 4.6.2.40. Information on ratings assigned to the Company
- 4.6.2.41. Information on procurement of the Company, including notices about tenders and other announcements on procurement, information on the results of procurement

<sup>&</sup>lt;sup>1</sup> In accordance with the RF legislation on personal data

- 4.6.2.42. Investor's calendar
- 4.6.2.43. Contact information for all interested parties.
- 4.6.3. The Company does not provide forecasting information about net profit and other results of financial and economic activities of the Company until their official disclosure in accordance with the requirements of the RF legislation.
- 4.6.4. The Company discloses additional information on itself and its activities described in paragraph 4.6.2 of the Regulations within the following deadlines:
- information specified in paragraph 4.6.2.14 of clause 4.6.2 of the Regulations shall be disclosed by the Company on its official webpage on the Internet weekly;
- information specified in paragraph 4.6.2.15 of clause 4.6.2. of the Regulations shall be disclosed by the Company on its official webpage on the Internet monthly;
- information specified in paragraphs 4.6.2.5, 4.6.2.6, 4.6.2.9 4.6.2.12, and 4.6.2.16
- -4.6.2.19 of clause 4.6.2. of the Regulations shall be disclosed by the Company on its official webpage on the Internet quarterly;
- information specified in paragraph 4.6.2.39 of clause 4.6.2. of the Regulations shall be disclosed by the Company on its official webpage on the Internet annually simultaneously with disclosure of its annual report;
- other information provided by clause 4.6.2 of the Regulations shall be disclosed by the Company on its official webpage within 3 business days after the change of the information (documents) or a certain event takes place.
- 4.6.5. The Company strives to disclose minutes of the General Meetings of Shareholders as soon as possible, but not later than the last day of the period established by legislation for drawing up the minutes of the General Meeting of Shareholders.
- 4.6.6. The Company compulsorily discloses information stipulated by the Standards of Information Disclosure by Participants of Wholesale and Retail Electricity Markets, approved by the Decree of the Government of the Russian Federation No. 24 on January 21, 2004 (hereinafter the Standards). The information is disclosed in the order, terms and in ways provided by the Standards.

#### 4.7. Confidential and insider information

- 4.7.1. The Company takes steps to protect information that constitutes state, commercial and other secrets protected by the RF legislation.
- 4.7.2. The procedure for attributing information to confidential, including commercial secret, as well as cases and procedure for providing such information are covered by organizational and administrative documents of the Company.
- 4.7.3. Confidential information, including commercial secrets, is property of the Company and is not subject to disclosure, unauthorized transfer and other public disclosure in any information sources.
- 4.7.4. Legal relations related to access to the Company's insider information are regulated by the Regulations on Insider Information approved by the Board of Directors of the Company.

#### 4.8. Control and responsibility for observance of Information Policy

- 4.8.1. These Regulations are approved by the decision of the Company's Board of Directors. The decision on introducing amendments and additions, as well as on cancellation of these Regulations, shall be adopted by the Company's Board of Directors.
- 4.8.2. Control over implementation of these Regulations is exercised by the Company's Board of Directors.
- 4.8.3. Responsibility for the completeness and reliability of the disclosed information about the Company and its activities is on the person performing functions of the sole executive body of the Company (Director General).
- 4.8.4. The Company's sole executive body (Director General) ensures procedures for preparing, approving, controlling the content and terms of information disclosure, the proper system for storing the Company's documents, functionality and safety of information resources.
- 4.8.5. The sole executive body (Director General) shall within 90 days after the reporting year, submit the annual report on compliance with the Company's Information Policy to the Board of Directors for consideration.