

**INTERNAL AUDIT**

**POLICY**

**OF ROSSETI CENTRE, PJSC**

**P TSA BP 34/03-06/2025**

**Data on the document**

1	Top-level business process	BP 34 "Internal Audit"
2	Top-level business process owner	Head of the Internal Audit Department
3	Responsible for the development and updating of the internal document	Head of the Internal Audit Department
4	Versions of the internal document	No. 6 No. 5 - approved by the decision of the Board of Directors (Minutes from 09.06.2023 # 29/23) No. 4 - approved by the decision of the Board of Directors (Minutes from 23.08.2021 # 36/21) No. 3 – approved by the decision of the Board of Directors (Minutes from 29.11.2019 # 40/19) No. 2 – approved by the decision of the Board of Directors (Minutes from 01.03.2016 # 04/16, with amendments approved by the decision of the Board of Directors (Minutes from 22.02.2017 # 03/17) No. 1 – approved by the decision of the Board of Directors (Minutes from 22.08.2014 # 18/14)
5	Justification for a new edition of the document	Order of PJSC Rosseti dated 19.11.202 5 No. 607
6	Periodic check	Performed: - based on the results of application or when changing the requirements of regulatory documents on the basis of which the document was developed; - based on changes in the organizational structure of Rosseti Centre, PJSC
7	Valid since last approval	5 years
8	Placement and storage	The original is in the Administration Office. The electronic version is in the document repository Docflow System, Internal Documents Library
9	Participants in the procedure/process	Internal Audit Department
10	Acquaintance method	Task in the Docflow System
11	Additional information	

## Content

1. Scope of application .....	4
2. Terms, definitions and abbreviations .....	4
3. Goals and objectives of internal audit, scope and types of services .....	6
4. The position of the Internal Audit Unit in the Company and accountability, ensuring independence .....	7
5. Powers and duties of the Internal Audit Unit.....	10
6. Communication procedure, nature and timing of information exchange.....	13
7. Quality assurance and improvement .....	14
8. Maintaining ethics and professionalism.....	15
9. Approaches to the implementation of internal audit .....	15
Appendix.....	17

P TSA BP 34/03-06/2025	Internal Audit Policy of Rosseti Centre, PJSC	Page 3	Total 18
Edition # 1		Print date: 12.01.2026	

## 1. Scope of application

1.1. The Internal Audit Policy of Rosseti Centre, PJSC (hereinafter referred to as the Policy) is a document of Rosseti Centre, PJSC (hereinafter referred to as the Company), developed to determine the basic principles of the organization and functioning of internal audit in the Company, and to assist in the formation of unified approaches to the construction, management, and coordination of internal audit in the Rosseti Group of Companies.

1.2. This Policy establishes the goals, objectives, competence (powers, role and responsibilities) of internal audit, its place in the organization, accountability, scope, types of services, approaches to ensuring quality control and evaluation of internal audit, and other basic approaches and principles applied by the Company in the implementation of internal audit.

1.3. This Policy has been developed in accordance with the requirements of the current legislation of the Russian Federation, recommendations of international and national standards in the field of internal audit, and local regulations of the Company.

1.4. This Policy is approved by a resolution of the Company's Board of Directors, taking into account its preliminary review by the Audit Committee of the Company's Board of Directors (hereinafter referred to as the Audit Committee) and the Company's executive bodies. Amendments to the Policy are made in a similar manner.

1.5. The head of the internal audit unit shall conduct a periodic (but not less than once a year) review of this Policy to reflect changed circumstances, including for the purpose of assessing the extent to which the powers, role and responsibilities of internal audit continue to be consistent with the internal audit strategy and the performance of the tasks of the internal audit unit, and, if necessary, initiate changes to the Policy.

1.6. This Policy contains general (methodological) provisions for the Company's subsidiaries and affiliates (hereinafter referred to as "SAA"). This Policy (including individual provisions of the Policy) is recommended for use by SAAs as the basis for developing internal documents regulating internal audit activities within the SAA.

## 2. Terms, definitions and abbreviations

The following terms and definitions are used in this Policy:

Item No.	Term	Definition
1	Internal audit	Independent and objective assurance and consulting services aimed at improving the Company's operations. Internal audit contributes to the Company's achievement of its goals by applying a systematic, consistent approach to assessing and improving the effectiveness of corporate governance, risk management, and internal control.
2	Internal Audit Department/IAD	For the purposes of this Policy, this is the structural unit of the Company responsible for providing assurance and consulting services to the Company, and also performing additional roles defined by this Policy.
3	Internal auditors	Employees of the Internal Audit Unit of the Company

P TSA BP 34/03-06/2025	Internal Audit Policy of Rosseti Centre, PJSC	Page 4	Total 18
Edition # 1		Print date: 12.01.2026	

4	Consulting services, consulting	Services, within framework of which internal auditors give recommendations to stakeholders of the Company <sup>1</sup> without provision confidence or acceptance of management responsibilities on themselves. Character and volume of consulting services are subject to coordination with corresponding stakeholders
5	Assurance services	Services, within framework of which internal auditors conduct objective assessment with provision assurance of stakeholders in the compliance of corporate governance <sup>2</sup> , risk management and internal control processes in the subject areas or auditees under consideration with established criteria. Internal auditors can provide limited or reasonable assurance depending on the nature, timing and extent of the procedures performed
6	Conflict of interest	A situation, action, or relationship that may influence, or create the appearance of influence on the internal auditor's ability to exercise objective professional judgment or perform his or her responsibilities objectively
7	Independence	Freedom from conditions that adversely affect the ability of the Internal Audit Unit to carry out its duties impartially
8	Internal Audit Unit competence	Powers, role and duties of the Internal Audit Unit, which are being assigned by the Board of Directors of the Company and (or) regulatory acts of the Russian Federation
9	Objectivity	A mindset that enables internal auditors to exercise unbiased professional judgment, perform their responsibilities, and achieve the goals of internal audit without adjusting their opinion to the opinions of others
10	Audit assignment	A specific internal audit assignment or project that involves several tasks or activities aimed at achieving a number of interrelated objectives

The following main abbreviations and definitions are used in this Policy:

Item No.	Abbreviation	Meaning
1	Internal Audit Unit	Internal Audit Department
2	PJSC Rosseti	Public Joint Stock Company "Federal Grid Company - Rosseti"/PJSC "Rosseti"
3	Rosseti Group of Companies	The main shareholder of the Company is PJSC Rosseti and subsidiaries and dependent companies of

<sup>1</sup> For this definition, the stakeholder is the executive bodies of the Company, deputies of the CEO.

<sup>2</sup> From here on in the text, it refers to corporate governance, including issues of management of the Company.

		PJSC Rosseti
4	Company	Rosseti Centre, PJSC
5	SDC	subsidiaries and dependent companies of Rosseti Centre, PJSC are legal entities in whose authorized capital the Company participates
6	Sole executive body/CEO, collegial executive body	Accordingly, the General Director of the Company and the Management Board of the Company <sup>3</sup>
7	Executive bodies/executive management	When jointly indicating in the text of this Policy the sole executive body and the collegial executive body of the Company
8	Audit Committee	Audit Committee of the Board of Directors of the Company
9	IIAS	International Standards of Internal Auditing developed by the International Institute of Internal Auditing
10	Policy	Internal Audit Policy of Rosseti Centre, PJSC

### 3. Goals and objectives of internal audit, scope and types of services

3.1. **The purpose of internal audit** is to strengthen the Company's ability to create, protect and preserve the Company's value by providing the Board of Directors and executive bodies of the Company with independent, risk-based, objective assurances, opinions, recommendations and forecasts.

3.2. **The internal audit of the Company is intended** to facilitate (Mission of internal audit):

- successful achievement of the Company's goals;
- improving corporate governance, risk management and internal control processes;
- improving the quality of decisions taken by the Board of Directors and the Sole Executive Body;
- strengthening the Company's reputation and increasing trust in it among stakeholders;
- improving the Company's ability to serve the public interest through the provision of assurance and advisory services.

#### 3.3. The tasks of the Internal Audit Unit include:

3.3.1. Conducting internal audits<sup>4</sup> of areas of activity, divisions, functions, processes, systems and other auditees in the Company and providing recommendations aimed at eliminating violations and deficiencies and improving the Company's activities.

3.3.2. Assessing corporate governance and providing recommendations for its improvement.

3.3.3. Assessing the reliability and effectiveness of the risk management and internal control system and providing recommendations for its improvement.

3.3.4. Organization of effective interaction between the Company and the Company's audit organization, the Company's Audit Commission, as well as with persons providing consulting services in the field of risk management, internal control and corporate

<sup>3</sup> The name of the sole executive body and the collegial executive body of the Company is indicated in accordance with the Articles of Association of the Company.

<sup>4</sup> Including the initiation, organization, and participation in specialized (official) investigations into cases of abuse (fraud), damage to the Company and its subsidiaries, misuse of resources, ineffective use of resources, and other cases of unfair/illegal actions by employees and third parties.

P TSA BP 34/03-06/2025	Internal Audit Policy of Rosseti Centre, PJSC	Page 6	Total 18
Edition # 1		Print date: 12.01.2026	

governance (within the competence of the Internal Audit Unit).

3.3.5. Provision of reports on the performance of the Internal Audit Unit to the Board of Directors (Audit Committee) and the Sole Executive Body.

3.3.6. Providing advice to the executive bodies of the Company on issues of internal control, risk management and corporate governance (while maintaining the independence and objectivity of internal audit).

3.3.7. Monitoring the implementation of recommendations and corrective action plans aimed at eliminating violations and deficiencies based on the results of the internal audit and improving the activities of the Company and its subsidiaries.

3.3.8. Implementation and application of unified approaches established in the Rosseti Group of Companies to the construction, management and coordination of internal audit in the Company and its subsidiaries.

3.3.9. Improving the regulatory framework for the activities of the Internal Audit Unit, taking into account the requirements of the IIAS and the legislation of the Russian Federation.

3.4. Objects subject to audit may include business units, processes, programs, systems, projects, and other auditees. The scope of internal audit is considered when development plan activities of the internal control authority based on the relationship between the level of identified risk and the known level of effectiveness of internal control for each object subject to audit, taking into account the requests of the Board of Directors and/or the Audit Committee and the executive bodies of the Company, the expected degree of coverage to ensure assurance within the Company, as well as the availability of internal control authority resources and the ability to rely on the results of the work of other parties providing assurance.

The scope also includes audit engagements that must be performed in accordance with legal and regulatory requirements.

3.5. The primary role of internal audit is to provide assurance and consulting services aimed at improving the Company's operations.

3.6. Roles outside the core role of internal audit include<sup>5</sup>: participation in the activities of the audit commissions of SDC by employees of the Company's Internal Audit Unit as elected members of the audit commissions of the SDC or invited experts.

3.7. When organizing internal audit, the Company strives to apply the basic principles and approaches reflected in the Corporate Governance Code, in regulatory legal acts governing the organization of internal audit work, and in the recommendations of the Bank of Russia on the organization of risk management, internal control, and internal audit in public joint-stock companies.

#### **4. The position of the Internal Audit Unit in the Company and accountability, ensuring independence**

4.1. The form of implementation of internal audit in the Company is creation of a separate structural unit (Internal Audit Unit) or outsourcing of an independent external organization, whose selection and contracting procedures are governed by the Uniform Procurement Standard (Procurement Regulation) approved by the Company's Board of Directors. The decision on the most optimal form of internal audit implementation is made by the Company's Board of Directors.

<sup>5</sup> The specified roles are performed by internal audit on an ongoing basis and do not have a negative impact on the independence of internal audit.

P TSA BP 34/03-06/2025	Internal Audit Policy of Rosseti Centre, PJSC	Page 7	Total 18
Edition # 1		Print date: 12.01.2026	

The creation, reorganization and liquidation of the Internal Audit Unit, which is a separate structural subdivision of the Company, are carried out by an order of the Sole Executive Body of the Company based on the decision of the Board of Directors with preliminary consideration by the Audit Committee of the Board of Directors.

When selecting an external organization to perform the internal audit function, the Company must ensure the independence and objectivity, professionalism and competence of such an organization and the organization's personnel involved in interaction with the Company.

4.2. When implementing the competence of the Internal Audit Unit, independence is achieved by delineating the functional and administrative subordination of the head of the Internal Audit Unit.

The head of the Internal Audit Unit is functionally subordinate to the Board of Directors, and administratively - to the Sole Executive Body of the Company.

4.2.1. The Board of Directors of the Company, within the scope of its competence, as defined by Federal Law No. 208-FZ of 26.12.1995 "On Joint-Stock Companies" and the Company's Articles of Association, exercises control and organizes internal audit, including:

- approves this Policy and amendments to the Policy;
- annually approves the Internal Audit Unit's activity plan, the report on the implementation of the Internal Audit Unit's activity plan and the Internal Audit Unit's budget;
- preliminarily approves decisions of the Sole Executive Body of the Company on the appointment, dismissal (not on the initiative of the employee) of the head of the internal audit department, the application of disciplinary sanctions to him, and also approves the terms of the employment contract with the head of internal audit, including the amount of his remuneration;
- considers significant limitations on the powers of the Internal Audit Unit or other restrictions that may adversely affect the performance of internal audit;
- considers instances of actual or potential impairment of the independence of the Internal Audit Unit and the protective measures taken in connection therewith, and confirms agreement with the actual or potential impairment of the independence of the Internal Audit Unit in the course of approving the roles and responsibilities of the head of the Internal Audit Unit not related to internal audit;
- reviews the results of the internal audit quality assessment.

4.2.2. Information on the progress of the implementation of the internal audit plan and the results of the implementation of internal audit, as well as on other aspects affecting internal audit, is provided to the Audit Committee at least once per quarter.

4.2.3. The head of the Internal Audit Unit shall hold meetings at least once a quarter with the Audit Committee or its chairman on issues within the competence of the Internal Audit Unit, including in the form of participation in meetings of the Audit Committee (in order to ensure the opportunity to discuss issues within the competence of the Internal Audit Unit at a meeting of the Audit Committee).

4.2.4. The administrative subordination of the Internal Audit Unit to the Sole Executive Body of the Company provides, among other things:

- allocation of the necessary funds within the approved budget for the implementation of internal audit by a decision of the Board of Directors of the Company;
- providing the Board of Directors of the Company with a position on the appointment and dismissal of the head of the Internal Audit Unit, including his

P TSA BP 34/03-06/2025	Internal Audit Policy of Rosseti Centre, PJSC	Page 8	Total 18
Edition # 1		Print date: 12.01.2026	



remuneration;

- ensuring the appointment, development and remuneration of the head of the Internal Audit Unit within the framework of the Company's human resources management procedures;
- receiving reports on the activities of the Internal Audit Unit, including information on the results of inspections, recommendations for eliminating violations and deficiencies identified during inspections, and proposals for increasing the efficiency and effectiveness of the risk management and internal control system, corporate governance, and for improving the activities of the Company and subsidiaries;
- administration of policies and procedures for the activities of the Internal Audit Unit;
- providing support in the interaction of the Internal Audit Unit with other divisions of the Company and subsidiaries (maintaining the status of the Internal Audit Unit in the Company).

4.3. Ensuring the independence of the Internal Audit Unit in the Company is carried out through:

- direct access of the head of the Internal Audit Unit to the Board of Directors and the Audit Committee, the Sole Executive Body;
- delineation of the powers and responsibilities of the Internal Audit Unit from the activities of other divisions of the Company, including the following:
  - the head of the Internal Audit Unit may not be assigned duties that are not related to the implementation of the internal audit roles approved by the Board of Directors of the Company within the framework of this Policy;
  - the structural Internal Audit Unit may not include divisions and employees whose activities are not related to the implementation of the Internal Audit Unit roles approved by the Board of Directors;
  - the head of the Internal Audit Unit cannot be assigned the management of functional areas of the Company's activities that require making management decisions in relation to auditees<sup>6</sup>;
- absence of restrictions on the powers of the Internal Audit Unit, including when determining the plan of activities of the Internal Audit Unit and the scope of audit checks carried out, rights of access to documentation, employees and assets of the Company, resource restrictions for the implementation of internal audit;
- ensuring the individual objectivity and independence of internal auditors by implementing measures aimed at preventing potential and existing conflicts of interest and bias, including a ban on auditing those areas for which the auditor was responsible during the year preceding the audit, and an assessment of the internal audit.

4.4. Internal audit does not replace or duplicate the functions of other employees and departments of the Company and its subsidiaries, including their ongoing and preventive control functions. Internal audit does not have the right to participate in the approval and decision-making process regarding the financial and economic activities of the Company and its subsidiaries.

4.5. The head of the Internal Audit Unit shall confirm to the Board of Directors of the Company the organizational independence of the internal audit department at least once

<sup>6</sup> For accounting by companies of the Rosseti group, to which the Bank of Russia's Regulation of 24.02.2016 No. 534-P "On the admission of securities to on-exchange trading" applies.

P TSA BP 34/03-06/2025	Internal Audit Policy of Rosseti Centre, PJSC	Page 9	Total 18
Edition # 1		Print date: 12.01.2026	

a year, which shall include, inter alia, informing the Board of Directors and the Sole Executive Body, as part of the report on the results of the Internal Audit Unit's activities and the implementation of the work plan, about instances in which independence may have been negatively impacted and/or perceived as such, as well as about actions or protective measures taken to limit such impact.

4.6. When assessing whether independence may be adversely affected, the head of the Internal Audit Unit should consider reporting relationships, roles, and responsibilities for any actual and/or potential (or perceived) limitations. Situations that may negatively impact independence include the following:

- The head of the Internal Audit Unit has no direct contact or interaction with the Board of Directors;
- attempts to limit or expand the scope of internal audit that is approved by the Board of Directors (Section 3 of this Policy);
- executive management attempts to restrict access to data, records, information, personnel and property necessary for the conduct of the Internal Audit Unit's activities;
- executive management exerts pressure on internal auditors to conceal or alter audit findings;
- The Internal Audit Unit's budget or resources are reduced to a level where the Internal Audit Unit cannot fulfill its responsibilities as set out in this Policy;
- an assurance audit engagement performed by or under the supervision of the principal auditor relates to a functional area for which the principal auditor has responsibility, over which the principal auditor has supervision, or over which the principal auditor can otherwise exercise significant influence;
- other circumstances that may be considered as limitations on the activities of the Internal Audit Unit.

## **5. Powers and duties of the Internal Audit Unit**

5.1. In carrying out their activities, the head and employees of the Internal Audit Unit have the following powers to:

5.1.1. Receive unlimited and unimpeded access to any assets, documents, accounting records, information systems and resources, materials for meetings (absentee voting) of the Board of Directors (its Committees), the Management Board, the Audit Commission, and other information on the activities of the Company and subsidiaries (including in electronic form), familiarization with draft resolutions and decisions of the Board of Directors<sup>7</sup> and executive bodies of the Company, as well as copying relevant documents and information.

5.1.2. Use information resources and software for internal audit purposes.

5.1.3. Request from the Company and its subsidiaries and promptly receive in writing (on paper or electronic media) documents, materials, explanations and other information in accordance with the objectives of the audits<sup>8</sup>.

5.1.4. Gain access to all buildings, structures, premises, offices, production, business and domestic areas of the Company and its subsidiary companies to perform the Internal Audit Unit's tasks.

5.1.5. Take photographs, videos and make sound recordings during the inspection.

5.1.6. Conduct interviews with employees of the Company and subsidiaries (with prior notification of the employee's manager) for the purposes of verification activities on

<sup>7</sup> Taking into account the regime of maintaining commercial and state secrets

<sup>8</sup> The specified documents and information must be submitted no later than 2 (two) business days from the date of receipt of the request, unless a different deadline is specified in the request.

P TSA BP 34/03-06/2025	Internal Audit Policy of Rosseti Centre, PJSC	Page 10	Total 18
Edition # 1		Print date: 12.01.2026	

issues related to the implementation of internal audit tasks.

5.1.7. Receive the necessary assistance from the Company's employees and subsidiaries in the context of inspections, including unscheduled ones, and the implementation of other tasks of the Internal Audit Unit.

5.1.8. Request from the Company and its subsidiaries any information necessary to monitor the progress of implementing the recommendations of internal auditors and the plan of corrective measures to eliminate violations and deficiencies identified as a result of audits, and to analyze the effectiveness of corrective measures.

5.1.9. Participate in meetings and sessions of the working bodies of the Company (committees, commissions, working groups, etc.) subject to maintaining a balance of independence and objectivity of the Internal Audit Unit and non-involvement in the operational activities of the Company.

5.1.10. Demand from persons responsible for eliminating identified violations and deficiencies:

- timely development, approval and implementation of action plans to eliminate identified violations and deficiencies;
- timely provision of reports on the status of implementation of activities;
- provision of clarifying or confirming information and documents on the status of implementation of action plans.

5.1.11. Carry out other actions necessary to achieve the objectives of internal audit and solve the tasks of the Internal Audit Unit.

5.2. The head of the Internal Audit Unit has the right to:

5.2.1. Participate in meetings of the Board of Directors, Committees of the Board of Directors, and executive bodies of the Company.

5.2.2. To become familiar with current and long-term plans/programs of activities, reports on the implementation of plans and programs, draft decisions and resolutions of the Board of Directors, Committees of the Board of Directors and executive bodies of the Company.

5.2.3. Involve, in the manner established by the internal documents of the Company and in agreement with their immediate supervisors, employees of the Company's structural divisions and subsidiaries as experts, third-party experts to solve specific problems within the framework of the activities of the Internal Audit Unit.

5.2.4. Submit for consideration by the Company's management bodies issues within the area of competence of the Internal Audit Unit in accordance with this Policy and the Internal Audit Unit's regulations.

5.3. In carrying out their activities, the head and employees of the Internal Audit Unit are obliged to carry out activities in accordance with the purpose, objectives, and competence defined by this Policy and the regulations on the Internal Audit Unit, including:

- prepare an internal audit activity plan for the reporting period, including a risk-focused audit plan that defines the priorities of internal audit in accordance with the objectives of the Company;
- conduct internal audits based on the approved plan of activities of the Internal Audit Unit, as well as unscheduled audits (if necessary);
- conduct other inspections at the request of the Board of Directors, the Audit Committee and the Sole Executive Body of the Company within the competence and resources of the Internal Audit Unit;
- monitor the implementation of the Company's action plans to eliminate deficiencies

P TSA BP 34/03-06/2025	Internal Audit Policy of Rosseti Centre, PJSC	Page 11	Total 18
Edition # 1		Print date: 12.01.2026	

and improve the risk management and internal control system, as well as corporate governance based on the results of internal audits;

- provide consultations to the executive bodies of the Company on issues of risk management, internal control and corporate governance;

- prepare a report and inform the Board of Directors (Audit Committee) and the executive bodies of the Company in accordance with the established frequency, but not less than once a year, on the implementation of the Internal Audit Unit's activity plan, on the results of the assessment of the risk management and internal control system, corporate governance;

- develop and maintain up-to-date the Company's regulatory documents governing activities in the area of organizing and implementing internal audit, including this Policy;

- perform other activities stipulated by this Policy and the regulations on the Internal Audit Unit.

5.4. In order to avoid the emergence of a conflict of interest, the head and employees of the Internal Audit Unit must refrain from:

- conducting an audit of those areas of activity for which they were responsible during the year preceding the audit;

- participating in inspections and other tasks in the event of a financial, property, family or any other interest in the activities of the auditees;

- engaging in any activity that might prejudice their impartiality or be perceived as prejudiced;

- managing employees of other departments, except in cases where these employees are assigned to participate in the performance of an audit or other tasks within the framework of internal audit.

5.5. In the event of significant restrictions on the powers of the Internal Audit Unit or other restrictions that could negatively impact the activities of the internal audit, as well as a conflict of interest, the employees of the Internal Audit Unit shall inform the head of the Internal Audit Unit of these facts, who in turn shall inform the Board of Directors (Audit Committee), the Sole Executive Body of the Company, as well as the head of the Internal Audit Unit of PJSC Rosseti.

5.6. Internal auditors should engage in the provision of only those services for which they have or can acquire the necessary competencies.

5.7. Each internal auditor is responsible for the continuous development and application of the competencies necessary to perform their professional duties. The head of the Internal Audit Unit must ensure that the Internal Audit Unit collectively possesses the competencies to provide the internal audit services defined in this Policy or has acquired the necessary competencies.

5.8. Internal auditors must maintain and continually develop their competencies to improve the effectiveness and quality of internal audit services. Internal auditors must engage in continuous professional development, including education and training.

5.9. The head and employees of the Internal Audit Unit must comply with the International Internal Audit Standards within the limits that do not contradict the norms and recommendations for the organization and functioning of internal audit established by the legislation of the Russian Federation, the regulatory acts of the Bank of Russia, and the Federal Property Management Agency:

- Internal auditors shall plan and provide internal audit services in accordance with the International Internal Audit Standards;

P TSA BP 34/03-06/2025	Internal Audit Policy of Rosseti Centre, PJSC	Page 12	Total 18
Edition # 1		Print date: 12.01.2026	

– The methodology of the Internal Audit Unit must be developed, documented, and maintained in accordance with the International Internal Audit Standards (IIAS). Internal auditors must adhere to the IIAS and the Internal Audit Unit's regulations when planning and delivering internal audit services, as well as when communicating results.

5.10. The head of the Internal Audit Unit is responsible for forming an opinion on the reliability and effectiveness of the risk management and internal control system, and the effectiveness of corporate governance in the Company.

5.11. In the event that the right to carry out individual audits or individual tasks of the Internal Audit Unit is transferred to an outsourcing company, responsibility for their implementation and results rests with the head of the Internal Audit Unit of the Company.

5.12. The responsibility of the head and employees of the Internal Audit Unit is determined by the terms of employment contracts, job descriptions, the Internal Audit Unit's regulations, and other internal regulatory documents of the Company and includes (but is not limited to) responsibility for poor-quality and untimely performance of tasks and functions assigned to them, failure to comply with labour discipline requirements, loss and/or damage to material assets and documents, disclosure of information constituting a secret protected by the laws of the Russian Federation and the internal documents of the Company.

## **6. Communication procedure, nature and timing of information exchange**

6.1. In order to ensure that the Board of Directors and the Sole Executive Body support and promote internal audit in the Company, as well as to enable the Board of Directors of the Company to exercise its oversight function, the Internal Audit Unit provides the Board of Directors (Audit Committee) and the Sole Executive Body with the necessary information, including:

- the Internal Audit Unit's plan and budget and subsequent amendments to them;
- changes that potentially affect the internal audit competence or the Policy;
- information about the potential negative impact on independence;
- the results of the provision of internal audit services and other activities of the Internal Audit Unit, including conclusions, assurances, consultations, opinions and monitoring results;
- results of the implementation of the quality assurance and improvement program.

The list of documentation that the head of the Internal Audit Unit communicates to the Board of Directors (Audit Committee) and the Sole Executive Body of the Company, as well as information on the frequency and deadlines for submitting the said documentation, are presented in the appendix to this Policy.

6.2. In the context of interaction with the Board of Directors and the Sole Executive Body, the head of the Internal Audit Unit exercises the right to:

- to participate in meetings (absentee voting) of the Board of Directors (Committees of the Board of Directors) and executive bodies, as well as direct access to the Board of Directors (Audit Committee) and executive bodies of the Company, including holding meetings with members of the Board of Directors (Audit Committee), in which the Sole Executive Body does not participate;
- to discuss with members of the Board of Directors (Audit Committee) disagreements between the Internal Audit Unit and the Sole Executive Body or other stakeholders.

6.3. The Internal Audit Unit interacts with the Board of Directors (Audit

P TSA BP 34/03-06/2025	Internal Audit Policy of Rosseti Centre, PJSC	Page 13	Total 18
Edition # 1		Print date: 12.01.2026	

Committee), the Sole Executive Body and other stakeholders:

- for the purpose of exchanging information regarding the Company's strategies, objectives and risks in order to determine internal audit priorities;
- on issues of accepting risks whose level exceeds the established risk appetite.

6.4. The Internal Audit Unit interacts with the Company's audit organization in the following main areas:

6.4.1. Assessing the quality of the audit organization's work, preparing a report based on the results of this assessment, presenting the assessment results for consideration by the Audit Committee, and ensuring that stakeholders are informed.

6.4.2. Providing assistance to the audit organization in provision of information on the state of the risk management and internal control system in the Company.

6.4.3. Participation in the discussion of the audit organization's conclusions on the state of the risk management and internal control system.

6.4.4. Participation in the resolution of disagreements arising during external audits on issues of mandatory audit in accordance with Russian accounting standards.

6.5. The Internal Audit Unit interacts with the unit(s) that provides methodological support and coordinates activities on internal control and risk management, including the exchange of information on risks, the development of control procedures, and the implementation of requirements and procedures established in the Company.

6.6. The Internal Audit Unit interacts with the Company's Audit Commission in the following main areas:

6.6.1. Organization and coordination of interaction between the structural divisions of the Company and the Audit Commission of the Company.

6.6.2. Preparation and provision of information and opinions within the competence of internal audit.

6.6.3. Organizational support for the activities of the Audit Commission.

6.6.4. Organization of the development by the Company's management of corrective measures based on the results of audit checks, aimed at eliminating identified violations/deficiencies and implementing the recommendations of the Audit Commission.

6.6.5. Monitoring the implementation of corrective measures aimed at eliminating identified violations/deficiencies and implementing the recommendations of the Audit Commission.

6.7. The Internal Audit Unit interacts with other participants in the Company's risk management and internal control system on issues related to the competence of the internal audit, as well as with other stakeholders monitoring and evaluating the risk management and internal control system in individual areas of activity.

6.8. The head of the Internal Audit Unit develops a scheme (map) of interaction between internal control entities and other stakeholders monitoring and evaluating the risk management and internal control system in individual areas of activity ("assurance map") - a document defining the areas of responsibility of the entities of the risk management and internal control system and other stakeholders in relation to individual risks of the company.

6.9. The Internal Audit Unit interacts with government supervisory authorities, as well as with other stakeholders, in the manner prescribed by the legislation of the Russian Federation and the relevant internal documents of the Company, on issues related to the competence of internal audit.

## 7. Quality assurance and improvement

P TSA BP 34/03-06/2025	Internal Audit Policy of Rosseti Centre, PJSC	Page 14	Total 18
Edition # 1		Print date: 12.01.2026	

7.1. The head of the Internal Audit Unit ensures the development, approval and implementation of quality assurance and improvement programs covering all aspects of internal auditing.

7.2. The program includes two types of assessments:

- in external assessments;
- in internal assessments.

7.3. Internal quality assessments include:

- current monitoring of the quality of internal audit;
- periodic internal assessments of the quality of the work of the Internal Audit Unit through self-assessment at least once a year.

7.4. When conducting current quality monitoring, the head of the Internal Audit Unit carries out:

- supervision over the implementation of inspections and other activities of the Internal Audit Unit;
- interaction with audited units and other stakeholders on issues related to the competence of internal audit;
- other actions necessary for continuous (current) analysis and evaluation of the Internal Audit Unit.

7.5. When assessing internal audit, the head of the Internal Audit Unit requests feedback from the Board of Directors (Audit Committee) and the Sole Executive Body.

7.6. An external assessment of the quality of internal audit is carried out by an independent external expert at least once every five years.

7.7. The results of internal and external assessments, as well as plans to address deficiencies in the work of the Internal Audit Unit and opportunities for improvement (if applicable) are provided to the Board of Directors (Audit Committee).

## **8. Maintaining ethics and professionalism**

8.1. Principles of internal auditors

1. Commitment

Internal auditors demonstrate a commitment to principles in their work and conduct.

2. Objectivity

Internal auditors maintain an impartial and unbiased attitude in providing internal audit services and making decisions.

3. Competence

Internal auditors apply their knowledge, skills and abilities to successfully perform their functions and responsibilities.

4. Professional diligence

Internal auditors exercise due professional care in planning and providing internal audit services.

5. Confidentiality

Internal auditors use and protect information appropriately.

8.2. In their activities, internal auditors adhere to the rules of conduct defined in the internal documents of the Company and the International Internal Audit Standards (IIAS) insofar as they do not contradict them.

## **9. Approaches to the implementation of internal audit**

P TSA BP 34/03-06/2025	Internal Audit Policy of Rosseti Centre, PJSC	Page 15	Total 18
Edition # 1		Print date: 12.01.2026	

9.1. The implementation of internal audit in the Company is carried out on the basis of unified approaches to the construction, management and coordination of internal audit established in the Rosseti Group of Companies.

9.2. In order to assist in improving the overall management efficiency of the Rosseti Group of Companies, audit activities and actions are planned and carried out taking into account the impact of risks associated with the processes being audited, not only on the activities of the Company, but also on the activities of the Rosseti Group of Companies as a whole.

9.3. In order to ensure the implementation of internal audit in the Rosseti Group of Companies on a unified basis, continuous monitoring of the quality of internal audit implementation and independence control, representatives of the Internal Audit Unit of PJSC Rosseti have the right to participate in meetings of the Board of Directors of the Company and the Audit Committee of the Board of Directors of subsidiaries of PJSC Rosseti<sup>9</sup> when considering issues related to the construction and implementation of the Company's internal audit.

9.4. In order to develop and apply unified approaches to the construction, management and coordination of internal audit in the Rosseti Group of Companies, the Company's Internal Audit Unit interacts with the Internal Audit Unit of PJSC Rosseti - a shareholder of the Company, in the following main areas (subject to compliance with the legislation on joint-stock companies, corporate requirements and restrictions):

9.4.1. Participation in the development of uniform requirements for approaches to the implementation of internal audit in the Rosseti Group of Companies.

9.4.2. Initiation of the development and timely updating of the Company's regulatory documents regarding issues of control, organization and functioning of internal audit.

9.4.3. Participation in the development of unified methodological documents (methodologies, instructions, regulations, standards and other documents) defining the approaches and principles of functioning of internal audit.

9.4.4. Implementation of the practice of conducting thematic audits by companies within the Rosseti Group of Companies on a specific topic in accordance with a unified audit program.

9.4.5. Participation in the formation of a unified knowledge base and in training events on the organization and implementation of internal audit.

<sup>9</sup> From here on, this term refers to the existence of an Audit Committee of the Company's Board of Directors. If the Audit Committee is not established by the Company's Board of Directors, all matters within the Audit Committee's purview, as defined by this Policy, are considered by the Company's Board of Directors.

P TSA BP 34/03-06/2025	Internal Audit Policy of Rosseti Centre, PJSC	Page 16	Total 18
Edition # 1		Print date: 12.01.2026	



Appendix  
to P TSA BP 34/03-06/2025

**The list of documentation communicated by the head of the Internal Audit Unit to the management bodies and the Audit Committee of the Board of Directors, as well as information on the delineation of powers between them**

Information provided	Periodicity	Separation of powers <sup>10</sup>		For reference: IAS point
		Board of Directors (Audit Committee) of the Company	CEO of the Company	
The Internal Audit Policy	If necessary	Approval (Agreement)	Approval	6.3
The Internal Audit Strategy	If necessary	Approval (Agreement)	Approval	9.2
The Internal Audit Quality Assurance and Improvement Program	If necessary	Approval (Agreement)	Approval	8.3
The organizational structure of the Internal Audit Unit (hereinafter referred to as the Internal Audit Unit)	If necessary	Approval (Agreement)	Approval	6.3, 7.1
The Regulation on the Internal Audit Unit (including the functions of the Internal Audit Unit, accountability, responsibilities of the Internal Audit Unit's Chief Audit Executive, requirements for qualifications, competence and work experience)	If necessary	Approval (Agreement)	Approval	6.3, 7.1, 7.2
A candidacy for the head (Chief Audit Executive) of the Internal Audit Unit (appointment and dismissal from office, terms of the employment contract, including the amount of remuneration)	If necessary	Approval (Agreement)	Approval	7.1
The Internal Audit Unit's Chief Audit Executive succession plan	In accordance with the general process	Approval	Approval	7.2
Target KPI values for the Internal Audit Unit's Chief Audit Executive	At least once a year <sup>11</sup>	Approval (Agreement)	Approval	7.1
Target parameters of the Internal Audit Unit's activities (as part of the materials on the Internal Audit Unit activity plan <sup>12</sup> )	At least once a year	Approval (Agreement)	Approval	8.3, 12.2
A methodology for assessing the activities of the Internal Audit Unit (as part of the materials on the Internal Audit Unit's activity plan <sup>13</sup> )	If necessary	Approval (Agreement)	Approval	10.2, 12.2

<sup>10</sup> The following designations are used: U-approval, S-agreement, O-approval, I-informing, R-review. The specified competencies of the Board of Directors and the Audit Committee of the Board of Directors in this Policy are formed in accordance with the International Internal Audit Standards (IIAS). When forming decisions of the Board of Directors and the Audit Committee of the Board of Directors of JSC/PJSC "\_\_\_", the competencies of the Board of Directors and the Audit Committee of the Board of Directors of the Company, as defined by the Articles of Association and the regulations on the governing bodies and the Audit Committee of the Board of Directors of the Company, shall apply.

<sup>11</sup> Unless another frequency is established by a decision of the Board of Directors of the Company.

<sup>12</sup> After completing the activities to develop a system of monitoring indicators of the Action Plan for the development and improvement of internal audit activities in the Rosseti Group of Companies for the period of 2025-2029 (Minutes of the Board of Directors of the Company dated 10.04.2025 No. 684)

<sup>13</sup> After completing the activities to develop a system of monitoring indicators of the Action Plan for the development and improvement of internal audit activities in the Rosseti Group of Companies for the period of 2025-2029 (Minutes of the Board of Directors of the Company dated 10.04.2025 No. 684)

P TSA BP 34/03-06/2025	Internal Audit Policy of Rosseti Centre, PJSC	Page 17	Total 18
Edition # 1		Print date: 12.01.2026	

The activity plan, budget, resource plan of the Internal Audit Unit and subsequent amendments to them	At least once a year	Approval (Agreement)	Approval	6.3, 8.1, 8.2 9.4, 9.5, 10.1-10.3
A report on the results of the Internal Audit Unit's activities and the implementation of the work plan, including: - Internal Audit Unit's budget execution report; - information on negative impact and/or perceived impact on independence and measures taken to limit such impact (7.1, 8.1); - information on restrictions imposed by managers and employees of auditees during audits (6.3); - a KPI performance report (Calculation of the remuneration of the Internal Audit Unit's chief audit executive) (6.1) current status of implementation of corrective measures to prevent and eliminate identified violations/deficiencies (15.2), results of the provision of internal audit services (8.1, 11.3) (including results of audits/assessments/inspections/consultations)	At least once a year/At least once a quarter* the procedure and frequency will be determined by individual local regulations	Approval (Agreement)	Approval	6.3, 7.1, 8.1, 11.3, 15.2, 10.1
Results of internal quality assessment, including: - a report on implementation of the action plan to eliminate deficiencies and use opportunities to improve internal audit (clause 8.4); - changes that potentially affect the competence of internal audit or the Internal Audit Policy (clauses 6.1, 6.2, 8.1); - results of the analysis of the need for changes in the Internal Audit Policy (clause 6.3); - results of the analysis of the need for changes to the Internal Audit Strategy (clause 9.2); - the result of self-assessment of the implementation of strategic initiatives (clause 9.2); - results of achieving target parameters of internal audit (8.3)	At least once a year	Approval (Agreement)	Approval	6.1, 6.2, 6.3, 8.1, 8.3, 8.4, 9.2, 12.1, 12.2
Reports on the results of individual audits	If necessary	Review (Review)	Review	8.1, 11.3
Results of the assessment of the reliability and efficiency of the Risk Management and Internal Control System	At least once a year	Review (Review)	Review	8.1, 11.3
Results of the corporate governance effectiveness assessment	At least once a year	Review (Review)	Review	8.1, 11.3
A plan and format for conducting an external assessment of the quality of internal audit	At least once every 5 years	Approval (Agreement)	Approval	8.4
Results of external quality assessment	Upon completion	Review (Review)	Review	8.3, 8.4
An action plan for eliminating deficiencies and using opportunities for improvement based on the results of self-assessment and external assessment of the Internal Audit (including training plans, plans for implementation of technological solutions)	At least once every 5 years	Approval (Agreement)	Approval	8.4, 10.1-10.3