

Appendix # 6
to the decision of the Board of Directors
of IDGC of Centre, PJSC
from 29.05.2019 #20/19

THE REGULATIONS
ON THE INSIDER INFORMATION OF IDGC OF CENTRE, PJSC
(new edition)

PS BS 4/17-03/2019

Moscow

Data on the document

Implemented	By the decision of the Board of Directors of IDGC of Centre, PJSC
Target management subsystem	Security
Top-level business process	BS 4 «Security provision»
Periodic inspection	Performed by the BS head «Security provision» at least once a year
Responsible for the procedure	BP head «HR management»
Version	№ 3 № 2 – by the decision of the Board of Directors from 31.05.2018 № 19/18 (PS BS 4/17-02/2018) № 1 – by the decision of the Board of Directors from 29.12.2011 № 27/11 (PS BP 1/SD-55)
Procedure for making changes	Based on the results of application or changes in the requirements of regulatory documents, on the basis of which this regulation has been developed
Developed by	Office of Anti-Corruption Compliance Procedures of the Security Department of IDGC of Centre, PJSC
Justification of a new version of the document	– changes in the legislation of the Russian Federation; – organizational changes in the Company; – reengineering of the Company's business process management system.
Placing and storage	Original – in the Docflow Section of the Administration Office; in electronic form – in the storage of Docflow System «Synergy Center», ASUD; Internal Documents Library
Participants of the procedure	All employees of IDGC of Centre, PJSC
Acquaintance method	Task in Docflow System «Synergy Center»

1. General provisions

1.1. These Regulations on the insider information (hereinafter – **the Regulation**) are an internal document of IDGC of Centre, PJSC (hereinafter - the Company) and developed according to requirements of Federal law of 27.07.2010 No. 224-FZ "About counteraction to unauthorized use of the insider information and to market manipulation and about modification of separate legal acts of the Russian Federation", regulations of the Bank of Russia, other existing subordinate regulatory legal acts, the Articles of Association of the Company.

1.2. The purposes of this Regulation are:

- execution of requirements of the legislation of the Russian Federation by the Company for counteraction to unauthorized use of the insider information and to market manipulation;
- protection of the rights and property interests of shareholders of the Company and other owners of securities of the Company;
- protection of reputation of the Company and increase in level of credibility to the Company from shareholders, potential investors, creditors, partners, professional participants of the security market, state bodies and other interested persons;
- ensuring economic security of the Company;
- control over compliance with the Regulation by persons admitted to the Company's insider information;
- establishment of general regulations of protection of data making the insider information of the Company;
- prevention of manipulation of prices of insider financial instruments.

1.3. The basic concepts, determinations and abbreviations used in this Regulation:

The Law - Federal law of 27.07.2010 No. 224-FZ "About counteraction to unauthorized use of the insider information and to market manipulation and about modification of separate legal acts of the Russian Federation";

The inside period – a period in which it is recommended to refrain from conducting transactions with insider financial instruments;

The insider information - accurate and specific information that has not been disseminated (including information constituting commercial, official secrets, banking secrets, communications secrets (in terms of postal money transfer information) and other secrets protected by law) and the distribution of which may have a significant impact on prices of financial instruments, foreign currency and (or) goods (including information relating to one or several issuers of equity securities (hereinafter – the issuer), one or several management companies, unit investment funds and private pension funds (hereinafter – the management company) or one or more financial instruments, foreign currency and (or) goods, and which relates to the information included in the list of insider information approved by the Company;

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Market manipulation - deliberate actions that are determined by the legislation of the Russian Federation on countering the unlawful use of insider information and market manipulation or regulatory acts of the Bank of Russia, which resulted in the price, demand, supply or trading volume of a financial instrument, foreign currency and (or) goods deviated from or maintained at a level significantly different from the level that would have been formed without such actions;

The Company - IDGC of Centre, PJSC;

Transactions with financial instrument, foreign currency and (or) goods (hereinafter – the transactions) - making transactions and other actions aimed at acquiring, alienating, otherwise changing the rights to financial instruments, foreign currency and (or) goods, as well as actions related to the commitment to perform these actions, including issuing requests (giving instructions) and cancelling such requests;

Disclosure of the insider information – ensuring access to information to all persons interested in it, irrespective of the purposes of obtaining this information, according to the procedure guaranteeing its availability and receiving;

Distribution of information - actions:

- directed to receiving information by an uncertain group of people or information transfer to an uncertain group of people, including by its disclosure in accordance with the legislation of the Russian Federation about securities;
- related to the publication of information in the media, including electronic, information and telecommunication networks, access to which is not limited to a certain circle of people (including the information and telecommunication network “Internet”);
- related to the dissemination of information through electronic, information and telecommunication networks, access to which is not limited to a certain circle of persons (including the information and telecommunication network “Internet”);

Financial instruments – securities or derivative financial instruments of the Company defined according to Federal law of 22.04.1996 No. 39 - FZ "About Security Market".

2. Insider information

2.1. Information, the list of which is approved by the regulation of the Bank of Russia and information determined by the Company as insider belongs to the insider information of the Company.

2.2. The list of the insider information of the Company is approved by General Director.

2.3. The list of the insider information of IDGC of Centre, PJSC is a public document and is subject to obligatory disclosure on the Internet at the address: <https://www.mrsk-1.ru/> no later than 3 (three) working days from the moment of its adoption and (or) introduction of changes or additions in it.

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2.4. The data which are not related to the insider information:

- the data which became available to an unlimited group of people including as a result of their distribution;
- researches, forecasts and estimates performed on the basis of public information concerning financial instruments and (or) goods of the Company, and also a recommendation and (or) offer on implementation of transactions with financial instruments and (or) goods of the Company;
- information and (or) data, based on it, which is transferred by the Company and (or) a person (persons) involved by it to potential acquirers of securities or used by the Company and (or) a person (persons) involved by it for making recommendations or motivation of potential acquirers otherwise to acquisition of corresponding securities, in connection with placement (the organization of placement) and (or) the offer (the organization of the offer) of equity securities of the issuer in the Russian Federation or abroad, including by means of securities placement of a foreign issuer, certifying the rights concerning equity securities of the issuer, on condition of the notification of potential acquirers that such information (data) can be used by them only for the purpose of making decision on acquisition of the placed (offered) securities.

3. The procedure and terms of disclosure of insider information

3.1. Insider information of the Company is disclosed in the manner and terms established by the legislation of the Russian Federation for the disclosure of insider information of persons specified in the Law.

3.2. The following insider information shall not be disclosed:

- decisions taken by the board of directors on matters within its competence in accordance with the charter, if such information in the prescribed manner relates to confidential information/trade secrets, except for information about decisions taken by the board of directors on matters within its competence in accordance with federal laws;
- on terms and conditions of an agreement on maintenance (stabilization) of prices for the issuer's equity securities (securities of a foreign issuer, certifying rights in relation to equity securities of the Russian issuer), except for the duration of the specified agreement.

4. The list of insiders

4.1. IDGC of Centre, PJSC keeps the list of insiders according the requirements of the Law.

4.2. The list of insiders of IDGC of Centre, PJSC includes the following persons:

- General Director (a person performing the functions of the sole executive body) of the Company;
- members of the Management Board of the Company;
- members of the Board of Directors of the Company;
- members of the Company's Audit Commission;

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- heads of branches and representative offices of the Company;
- Deputies General Director of the Company;
- chief advisers/advisers, assistant managers of the Company;
- heads of structural subdivisions of the Company;
- the Company’s employees who have access to insider information on the basis of employment and (or) civil law contracts;
- information agencies that provide information disclosure;
- persons assigning ratings to IDGC of Centre, PJSC;
- persons who have access to insider information on the basis of agreements concluded with IDGC of Centre, PJSC (including auditors, appraisers, professional participants in the securities market, credit and insurance organizations).

4.3. IDGC of Centre, PJSC notifies the persons included in the list of insiders about their inclusion in and exclusion from such a list in accordance with the Law.

4.4. IDGC of Centre, PJSC has the right to request from insiders, included in the list of insiders of the Company, information about transactions with securities related to insider financial instruments and the conclusion of contracts that are derivative financial instruments, and the price of which depends on such securities.

4.5. The persons included in the Company’s list of insiders are responsible for the unlawful use of insider information, market manipulation and violation of the requirements of the legislation on countering illegal use of insider information and market manipulation in accordance with the legislation of the Russian Federation.

4.6. Making transactions with insider financial instruments by individuals included in the list of the Company’s insiders, as well as persons related to them with violation of the conditions for such transactions, defined in section 5 of this Regulation, is the basis for bringing such persons to civil and (or) other types responsibility.

5. Terms and conditions of transactions with insider financial instruments

5.1. Insiders must refrain from making any transactions with insider financial instruments during inside periods.

5.2. The inside period begins no later than 15 calendar days before the signing of the accounting (financial) statements prepared in accordance with Russian Accounting Standards (RAS) and consolidated financial statements prepared in accordance with International Financial Reporting Standards (IFRS), and ends on the day following the day of publication of the specified statements.

5.3. IDGC of Centre, PJSC at the beginning of the calendar year informs insiders about inside periods by posting relevant information on the Company’s official website on the Internet.

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6. Control of compliance with the law about the insider information

6.1. Control over compliance with the requirements of the Law and the normative acts, adopted in accordance with it, is carried out by a structural subdivision (official) determined by organizational and administrative documents of IDGC of Centre, PJSC.

6.2. The structural subdivision (official) that oversees compliance with the requirements of the Law and the regulations, adopted in accordance with it, reports to General Director.

6.3. The structural subdivision (official), which monitors compliance with the requirements of the Law and regulations, adopted in accordance with it, annually, not later than 90 days from the end of the reporting year, sends to General Director a report on compliance with the requirements of the legislation on control of insider information at IDGC of Centre, PJSC.

6.4. The control over compliance with legislation in the field of insider information includes:

- identification of information related to insider information and its inclusion in the list of insider information of IDGC of Centre, PJSC;

- control of the completeness and relevance of the List of insider information of IDGC of Centre, PJSC;

- control of disclosure of the List of insider information of IDGC of Centre, PJSC on the Company's official website on the Internet;

- control over maintaining the list of insiders;

- control over the notification of insiders about their inclusion (exclusion) in (from) the list;

- monitoring the fulfillment of the obligation to send the list of insiders to trade organizers and the Bank of Russia in accordance with the legislation;

- control over the compliance of the Company's structural subdivisions that work with insider information with the requirements of the law and local regulations of the Company in the area of countering the unlawful use of insider information and market manipulation;

- control over the procedure and timing of disclosure and provision of insider information;

- advising employees of the Company on issues related to the application of legislation in the field of countering the unlawful use of insider information and market manipulation, as well as local regulations of the Company in this area;

- development of local regulatory acts of the Company on the issues of combating illegal use of insider information and market manipulation;

- control over the compliance of the Company's internal documents with the requirements of legislation in the sphere of countering the unlawful use of insider information and market manipulation.

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7. Final provisions

7.1. Approval of this Regulation, and also change and addition in it, is performed according to a decision of the Board of Directors of the Company.

7.2. In case of introduction of amendments to the legislation of the Russian Federation in the field of counteraction to unauthorized use of the insider information, this Regulation will work in the part which does not contradict the legislation of the Russian Federation.

7.3. Invalidity of separate provisions of this Regulation does not result in recognition of invalidity of other regulations or the Regulation in general.

7.4. Control of execution of this Regulation is exercised by General Director of the Company.

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