



Approved by the decision of the  
Board of Directors of PJSC Enel Russia  
(minutes № 7/20 dated 28.05.2020)

## **CONTENTS**

1. DOCUMENT AIMS AND APPLICATION AREA.....	2
2. DOCUMENT VERSION MANAGEMENT .....	2
3. UNIT IN CHARGE OF THE DOCUMENT .....	2
4. REFERENCES .....	2
5. ORGANIZATIONAL PROCESS POSITION IN THE PROCESS TAXONOMY.....	3
6. DEFINITIONS AND ACRONYMS .....	3
7. MAIN PRINCIPLES (PROVISIONS) .....	4

## 1. DOCUMENT AIMS AND APPLICATION AREA

This Policy defines the common intentions and business areas of PJSC «Enel Russia» for the anti-corruption performance. Anti-corruption policy provides basis for implementation and improvement of the anti-bribery management system of the Company.

Objectives of this document are:

- Declare the common intentions and plans of PJSC «Enel Russia» for its anti-corruption performance;
- Establish the basis for the activity and goal setting for combating the corruption;

This document is referred to the following actions related to the company activities:

- bribes in public, private and nonprofit segments;
- bribes extorted by organizations;
- bribes extorted by employees of organizations acting on behalf of the organization or in its interests;
- bribes extorted by business partners of organizations acting on behalf of the organization or in its interests;
- bribery of organization;
- bribery of employees of organization related to the organization's activities;
- bribery of business partners of organization related to the organization's activities;
- bribery committed directly or through another (e.g. bribery offered or accepted through third persons or by third person).

The Policy is brought to the attention of all the persons working for or on behalf of the Company, and is available for all the stakeholders on the website of PJSC «Enel Russia».

At the annual meeting of the Anti-Corruption Compliance Committee, the need for change/correction hereof is established.

This document shall apply to all the power plants of PJSC «Enel Russia».

## 2. DOCUMENT VERSION MANAGEMENT

Version	Date	Main changes description
1	13/05/2020	Issue of № 450 the first Policy

## 3. UNIT IN CHARGE OF THE DOCUMENT

Responsible for drawing up the document:

- Audit;
- Health, Safety, Environment and Quality;
- Legal and Corporate Affairs;
- Security Group.

Responsible for authorizing the document:

- People and Organization

## 4. REFERENCES

- Charter of PJSC Enel Russia.
- Code of Ethics of PJSC «Enel Russia».

- Zero Tolerance to Corruption Plan Regulation of PJSC «Enel Russia».
- Global Compliance Program on corporate criminal liability (to the Minutes of the meeting of the Board of Directors of PJSC «Enel Russia» No. 2/16 dated 23.11.2016).
- International standard ISO 37001:2016 "Anti-bribery management system. Requirements and recommendations for use".
- Federal Law dated December 25, 2008. No. 273-FZ "On Anti-Corruption".
- Anti-corruption international law acts (OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, 1997; Council of Europe Criminal Law Convention on Corruption, 1999; United Nations Convention against Corruption, 2003).

## 5. ORGANIZATIONAL PROCESS POSITION IN THE PROCESS TAXONOMY

Process Area: Health, Safety, Environment and Quality

Macro Process: Integrated Management System

## 6. DEFINITIONS AND ACRONYMS

Acronym and Key words	Description
Bribery	offering, promising, giving, accepting or soliciting of undue preference in any form (both financial and nonfinancial) directly or through intermediaries, regardless of location, in violation of the effective laws as an incentive or remuneration to the person who acts or refrains from actions with respect of the business results he is responsible for (ISO 37001:2016 section 3.1)
Enel Group	Group of companies under the general control of Enel Holding
Anti-bribery management system	Part of the common management system in the company used to develop and implement its Policies on anti-corruption and related corruption risk management. <b>Note 1:</b> Management System is a combination of interrelated elements used for establishing policy and goals as well as for achieving these goals. <b>Note 2:</b> The management system includes the organizational structure, planning (including risk assessment and goal setting), responsibility, experience (work methods), procedures, processes and resources.
Company	PJSC «Enel Russia»
Continuous improvement	The process of the management system improvement in order to increase the general anti-corruption performance in accordance with the Anti-Corruption Policy of PJSC «Enel Russia»
Power Plant(s)	<ul style="list-style-type: none"> <li>• Konakovskaya GRES power plant of PJSC «Enel Russia»,</li> <li>• Nevinnomysskaya GRES power plant of PJSC «Enel Russia»,</li> <li>• Sredneural'skaya GRES branch of PJSC «Enel Russia»</li> </ul>
Performance	Degree of implementation of the planned activity and achievement of the planned results.
Corruption risk	Combination of probability of event that may take place in the course of the Company operations with high corruption risk or other event with similar effects

<b>Acronym and Key words</b>	<b>Description</b>
HQ	Headquarters, PJSC «Enel Russia»
HSEQ	Health, Safety, Environment and Quality of the Headquarters branch of PJSC «Enel Russia»

## **7. MAIN PRINCIPLES (PROVISIONS)**

PJSC «Enel Russia» is aware that corruption can impede economic, political and social development causing major violations of correctness and transparency markets rules.

Therefore, when carrying out its activities PJSC «Enel Russia» is committed to fully comply with the principles of the Code of Ethics and Zero Tolerance to Corruption Plan Regulation of PJSC «Enel Russia» and the organization and management model in accordance with the Global Compliance Program within the corporate criminal liability. The Company is also committed to pursue the following common goals on prevention and combating of corruption:

- complete prohibition of such behavior as corruption or corruption attempts;
- strict observance of the effective corruption prevention and control laws;
- implementation of the Corruption Prevention Management System as per requirements of international standard ISO 37001 by way of protection against corruption and in order to ensure continuous improvement of their activity;
- promotion of immediate information provision on possible corrupt practices, provision of employees and stakeholders with the technical capabilities for reporting behavior that is not in conformity with the Company's Policy, as well as protection of employees who informed about possible corruption practices against any aggressive retaliation;
- pursuit of any behavior that is not in conformity with the Anti-Corruption Policy of PJSC «Enel Russia» with imposition of penalties provided for by the laws and local legal acts of the corporate sanctions system;
- presence of the Anti-Corruption Committee consisting of the heads of the Internal Audit Group, Legal and Corporate Affairs HSEQ and Security Group granted with all powers and authorities they need;
- raising awareness and training of their employees in corruption prevention.