

Key developments in 2018

In order to keep the Company's anti-corruption regulations updated, RusHydro undertook the following in 2018:

- approved a new Regulation on the Procedure for Accepting, Processing and Responding to the Reports received through RusHydro Group's Line of Trust¹, including the following additions and amendments:
 - adding and modifying terms and definitions;
 - updating a list and responsibilities of the officers and divisions in charge of receiving and considering reports received through the Line of Trust;
 - updating the procedure for responding to the reports received through the Line of Trust;
- amended the Rules of RusHydro's Line of Trust Operation² to change the dial-in hotline number;
- amended³ the Code of Corporate Ethics in terms of the measures designed to prevent the substantial shareholders' misconduct in connection with the Company's transactions involving a conflict of interest, as well as mitigating the effects of such misconduct;
- approved the Regulations on the Procedure to Report Presents Received by RusHydro's Employees⁴ updating the reporting procedure and the criteria, limits and restrictions for giving presents and using of representation allowances and hospitality expenses;

- amended RusHydro's Regulations on the Prevention and Management of Conflicts of Interest in terms of the procedure for considering notices of potential conflicts of interest of employees holding positions named in the list approved by Resolution of the Government of the Russian Federation No. 613 of July 22, 2013 and clarified by the Executive Office of the Government of the Russian Federation (Order No. 44 of January 29, 2019).

Anti-corruption program implementation roadmap for 2019

In 2019, the Company will continue rolling out the Comprehensive Program of Anti-Corruption Activities, which will include:

- developing and updating the Company's anti-corruption regulations and by-laws;
- providing for transparency and availability of information on the Company's anti-corruption policy and ensuring employees' awareness of anti-corruption legislation;
- providing for investigations into any reports of wrongdoings;
- Cooperating with the state regulatory bodies and law enforcement authorities responsible for combating corruption;
- measures to prevent wrongdoings by the Company's employees.
- other measures for improving efficiency of anti-corruption efforts.

Providing for transparency and availability of information [102-17]

The following information is published on RusHydro's website and intranet portal and updated on a timely basis:

- the Company's local internal documents on combating corruption and preventing wrongdoings and conflicts of interest;
- action plans and reports on the implementation of the Comprehensive Program of Anti-Corruption Activities;
- information, effective laws and regulations, and guidance on combating corruption.

RusHydro works in close cooperation with the law enforcement authorities and supervisory bodies and provides assistance to them in case of audits and inspections, requests of information on the Company's anti-corruption compliance (including with respect to storage and transfer to the authorities of the information and documents on corruption offences), investigations of corruption cases, and inspections seeking to check how the Company prevents and combats corruption.

In 2018, the Company completed the integration of RusHydro Group's hotlines into the single Line of Trust and updated the Regulation on the Procedure for Accepting, Processing and Responding to the Reports Received through the Line of Trust, which sets the list and responsibilities of the officers and divisions in charge of receiving and considering reports, and defines the procedure for responding to them.

¹ Order No. 689 of September 12, 2018.

² Order No. 1018 of December 27, 2018.

³ Board of Directors minutes No. 281 of December 27, 2018.

⁴ Order No. 60 of February 5, 2019.