



Information openness policy

Our aim to build a truly effective system of information disclosure and assurance of a high level of transparency is reflected in the following information policy principles:

Information openness policy

<p>Regularity and promptness</p> <p>We provide information on our activities to all stakeholders within the period specified in laws and regulations of the Russian Federation and the Company's internal documents.</p>	<p>Availability of information</p> <p>In disclosing information on our activities we use information dissemination channels ensuring free and uninterrupted access to the information by all stakeholders.</p>
<p>Accuracy and completeness of disclosed information</p> <p>We provide to all stakeholders accurate and actual information, not avoiding disclosure of negative facts, in the volume which provides a true and fair view of the Company and results of its activities.</p>	<p>Maintaining a reasonable balance between the Company's openness and its commercial interests</p> <p>We maintain a reasonable balance between the transparency, on the one hand, and confidentiality, on the other hand, in order to protect information which is categorized by the Company as proprietary or constituting a trade secret.</p>

The observance of the above principles enables us to uphold rights of shareholders, investors and other stakeholders for obtaining

information on the Company's activities to the maximum extent.

Insider information control system

The insider information-related legal requirements to JSC IDGC of the North-West as an issuer arise due to the fact of placing the Company's financial instruments on trade platforms of Russia: the Moscow Exchange Stock Market.

In accordance with the policy of internal control of the Company, in order to ensure compliance with legal requirements relating to treatment of insider information, the Company carries out compliance control in the area of insider information in three directions: preventive, current and follow-up.

1 In order to establish preventive compliance control procedures by the Board of Directors the Company approved the Provision on Insider Information of JSC IDGC of the North-West, which takes into account the requirement of Federal Law No.224-FZ of July 27, 2010 on Prevention of Illegitimate Use of Inside Information and Market Manipulation and on Amendments to Certain Laws of the Russian Federation. The following procedures are set forth in the Provision:

- establishment of rules of creation of a list of the Company's insiders;
- determination of a list of the Company's insider information;
- establishment of rules of handling insider information;
- establishment of rules of performing transactions with insider financial instruments of the Company;
- conclusion of confidentiality agreements for insider information.

Furthermore, in order to improve preventive control the Board of Directors of the Company approved the Corporate Code of Conduct regulating corporate responsibility and ethics of insiders who are the Company's employees.

2 Within the framework of ongoing compliance control the Company implements the following procedures:

- keeping a list of insiders;
- registering notices of inclusion of a person into the list of insiders or exclusion from such list and of transactions made by insiders with the Company's securities;
- control over compliance with the rules of performing transactions with the Company's insider financial instruments on the basis of information on (notices of) performance of transactions by insiders.

3 Within the framework of follow-up compliance control the Company carries out the analysis of:

- the dynamics of prices for financial instruments of the Company in organized markets;
- transactions with the Company's securities declared in notices given to the Company by insiders and information on transactions performed by shareholders obtained from the registrar of securities.