

APPOVED  
The Order of the SE “NPC “SE «NPC «UKRENERGO»”  
as of 12.02.2018 № 62



## **INFORMATION POLICY OF THE SE** **“NPC “SE «NPC «UKRENERGO»”**

Main goal of the Regulation on Information policy of the state enterprise “NPC “SE «NPC «Ukrenergo»” amounts to creation of the public, transparent and open European transmission system operator , which operation meets the best international practices of the corporate business as well as the principles of the EU legislation, in particular, of the so-called EU`s “Third Energy Package”.

## I. MAIN PROVISIONS

1. The Information policy is worked out in accordance with the current legislation of Ukraine as well as the Charter of the state enterprise "National Power Company "SE «NPC «Ukrenergo»" approved by the Ministry of Energy and Coal Industry of Ukraine as of 12.09.2017 № 599; the following document considers as well the Provisions on the Commercial secret and the Confidential information of the SE "NPC "SE «NPC «Ukrenergo»" approved by the Order of the SE "NPC "SE «NPC «Ukrenergo»" as of 09.01.2018 № 4.

2. The Information policy is an internal document outlining main principles of communications and creation the single information space of the SE "NPC "SE «NPC «Ukrenergo»" as well ensuring the disclosure of information on the current activities, stage and perspectives of the company`s development.

3. The Information policy is worked out in order to:

- create the system of the strategic communications;
- ensure the effective coordination of the external and internal communications of the company;
- provide the integral and approved information on the company`s activities;
- guarantee the intime reliable information disclosure regarding the company`s activities;
- create the loyal information space;
- enhance the level of openness and trust in the relations between the SE "NPC "SE «NPC «Ukrenergo»" and the stakeholders; to promote the creation of the company`s positive image both inside and outside.

4. The CEO at SE «NPC «Ukrenergo» defines the information policy of SE «NPC «Ukrenergo». Coordination of the Information policy implementation is carried out by the Chief Communications and International Cooperation Officer as well as by the Division of Communications with Media and public at SE «NPC «UKRENERGO» (hereinafter referred to as the Communications Unit).

5. The Information policy is mandatory for execution by all employees of SE «NPC «UKRENERGO»

## II. THE FOLLOWING NOTIONS AND TERMS ARE USED IN THE INFORMATION POLICY

**official web site** – e-documents (pages) under the same title/name, topic and navigation system, prepared by means of special technical tools and software with the aim of distribution the information about the SE «NPC «UKRENERGO»`s activities on the Internet, located at: <https://ua.energy>;

**official page in the social network** – e-documents (pages) under the same title/name, topic and navigation system, placed on the Internet;

**public speeches** – speeches of the CEO at SE «NPC «UKRENERGO» and (or) representatives of SE «NPC «UKRENERGO» at public events: conferences, forums, seminars, phone- and video- conferences and other events with the participation of public and mass media (hereinafter referred to as media);

**media** – international, regional or local information agency, revision, periodic or one-time printed edition, including business, finance or social and politics newspaper, magazine, radio, TV or video programs; electronic or any other method to distribute the information being transmitted as a published text, material, audio and visual messages or as air, cable

and satellite TV and radio, teletext, videotext, Internet, other telecommunication networks and other accessible means.

**requests** – requests from media as regards to provision of information related to the SE «NPC «UKRENERGO»`s activities or those of the separated Divisions, executed in writing or via e-mail;

**external and internal communications** – a set of measures aimed at meeting the informational needs of SE «NPC «UKRENERGO», its separated Divisions and other stakeholders with the reliable information about the operational activity of SE «NPC «UKRENERGO», provision of access to the information, clarifying of the Information policy of SE «NPC «UKRENERGO» to all stakeholders, support of the SE «NPC «UKRENERGO»`s positive reputation, creation of the public opinion favorable for implementation of the SE «NPC «UKRENERGO»`s strategic tasks.

### **III. MAIN INFORMATION POLICY PRINCIPLES**

Main principles of the Information policy are as follows:

- **openness and comprehension among the customers, Company`s services consumers, national and international partners and organizations** – provision of the necessary information in a convenient form and in time;

- **openness to communication with the professional associations and the expert environment** – active involvement in discussions and initiatives of SE «NPC «UKRENERGO»;

- **consistency** – SE «NPC «UKRENERGO» highlights its activities on a regular basis;

- **proactivity** – informing based on a permanent participation in creation of the information field and active cooperation with the target audiences;

- **efficiency** – information is prepared and communicated to the target audiences within shortest periods of time, being relevant before it becomes well-known or before got leaked in the media from the alternative sources;

- **objectivity** – official distributed information based on the real facts and indicators (documents);

- **completeness and reliability** – the full scope of the agreed information is provided;

- **effectiveness** – information materials should be prepared at a high professional level being easily perceived by the users, the most effective communication tools and channels should be used in course of communication;

- **accessibility** – distributed materials should be technically accessible for the target audiences;

- **manageability** – distribution of information is centralized, via the responsible person for the information distribution in SE «NPC «UKRENERGO» or its separated Division or upon his consent;

- **unity** – unity of the distributed information content is ensured as well as unity of the formats and standards regarding distribution of information;

- **professionalism** – all communication materials and messages should be outlined at the highest professional level;

- **equality** – ensuring equal rights and opportunities in obtaining information by the stakeholders except the information with a limited access in cases stipulated by the legislation of Ukraine and internal documents of SE «NPC «UKRENERGO»;

- **confidentiality and protection of the commercial interests** – make The necessary efforts to protect the information with the limited access;

- **virtue** – SE «NPC «UKRENERGO» does not correct or amend the already published

articles/information on the web site and/or in the social networks without a prior notice;

- **clarity** – usage of available tools to make the wide range of persons aware: infographics, motion-graphics, video reels, etc.;
- **predictability** – early publication of materials and projects which are to change the electricity market participants conditions of activity;
- **political indifference** – SE «NPC «UKRENERGO» does not provide any comments as regards to political issues as well as does not evaluate the actions of certain politicians;
- **Decentralization of information flows** – SE «NPC «UKRENERGO» promotes the broad involvement of the deputies and Heads of directions to highlighting the Company`s activities in order to “decentralize” the information channels.

#### **IV. INFORMATION DISCLOSURE AND TRANSPARENCY**

SE “NPC “Ukrenergo” ensures the intime and precise information disclosure regarding all important issues that relate to the company`s activities, including its financial situation, ownership and management.

1. The information which is to be disclosed includes (but is not limited to):

1.1. Tasks and goals of the SE “NPC “Ukrenergo”, their fulfillment (including the advantages/disadvantages balance between the goals which may be in conflict, results of the goals attainment via disclosure of the key financial and non-financial operational indices).

1.2. Results of financial and operational activities of the company (operating expenses and sources of their financing, financial plan, balance sheet, profit and loss account, cash flow statement and annexes s to the financial statement, etc.).

1.3. The structure of management, ownership and voting procedures, changes to them, including corporate governance policies and their application. Any other special rights or agreements that differ from generally accepted corporate governance rules (for example, the right to veto).

1.4. Information about key company officials, members of the Supervisory Board, board of directors, including the remuneration they receive, in order to assess their experience and qualifications, the risks of conflicts of interest and the impact on their performance. Information on the procedure for selecting candidates for the Supervisory Board, their position in the supervisory boards of other companies.

1.5. Significant risk factors that can be predicted (political, operational or currency related to the power industry or a specific geographic area, dependence on certain types of raw materials, risks in the financial market, including risks associated with interest rates or exchange rates, with ecological responsibility, employment, etc.). Measures developed/are implemented to manage such risks.

1.6. Information on any financial assistance, including government guarantees, commitments and grants, including contractual obligations arising out of public-private partnerships. Information about company relationships with creditors, key vendors and local authorities.

1.7. Information on transactions with state-owned enterprises for large amounts.

1.8. Issues related to employees and other stakeholders who can have a significant impact on the results of the activity of SE «NPC «Ukrenergo «. Personnel policy, programs of development and personnel training, coefficients of employee retention, collective bargain agreement, mechanisms of the employees` interests representation. Significant information on environmental, social, human rights and anti-corruption measures.

2. Annual financial statements should be independently audited in accordance with the

international standards.

3. SE «NPC» Ukrenergo « annually publishes a consolidated report on the results of activities and development of the company. Such a report focuses on the financial results of operations and includes information on the results of activities related to key non-financial indicators (review of the development of the SE «Ukrenergo», a report on changes in the management, the Supervisory Board, consolidated financial information), as well as methods of data aggregation. Information should be prepared, checked and made public in accordance with the accounting standards, disclosure of financial and non-financial information and auditing.

## **V. CHANNELS (WAYS) OF THE INFORMATION DISTRIBUTION**

1. Information distribution channels should ensure an equitable, timely and unrelated to high costs access of the users to the necessary information, including the Internet.

SE «NPC «Ukrenergo» uses the following channels of the information disclosure:

- publication of information on the official website, on the official pages of the company in social networks;
- issue and distribution of press releases in the media;
- publication of information in the media;
- placement and distribution of photo and video materials about the company`s activities or its separate subdivisions;
- delivery (forwarding) of information on paper and/or electronic media;
- informing mass media during public speeches of the authorized representatives of SE «NPC «Ukrenergo «;
- holding press conferences, press tours, meetings, round tables, seminars, press-breakfasts, press-lunches, expert discussions, etc. with the participation of representatives of the company, its separate units and other persons;
- participation in the Ukrainian and international industry exhibitions, conferences and forums;
- providing information to public organizations for its use / within implementation of the plans of their activities;
- PR-actions and presentations;
- distribution of information and image printing products (booklets, brochures, information folders, calendars, etc.).

2. SE «NPC «Ukrenergo» has the right to use other ways of the information disclosure and distribution which is not prohibited by Ukrainian legislation and complies with the principles of the Information Policy.

3. In order to create a unified and an integral image of the company, the development and approval of any sketches of information and image printing, souvenir and other products using the logos of the State Enterprise «NPC «Ukrenergo «shall be carried out in accordance with the standards of the brand-name of the company approved by Order of State Enterprise «NPC «Ukrenergo» dated November 29, 2017, No. 374.

4. SE «NPC «Ukrenergo» has an official account in Facebook, LinkedIn, official channels on Youtube and Slideshare, and also can create official pages of the company in other social networks.

Creation of the official page in a social networks is not allowed to the separate divisions of the enterprise.

Certain projects of the SE «NPC «Ukrenergo» may have an official page in Facebook

and LinkedIn (or other social networks) only with the permission of the CEO at the SE «NPC» Ukrenergo «and/or Chief Communications and International Cooperation Officer.

5. The procedure for preparation and publication of information shall be carried out in accordance with the business processes of the direction of communications and international cooperation, ran into effect by the order of the SE «NPC «Ukrenergo «dd. 27.12.2017 No. 430.

## **VI. ENSURING THE RELEVANT INFORMATION**

1. The State Enterprise «NPC «Ukrenergo» ensures the relevance of information about the activity of the company which is published or provided in response to a certain request.

Such information is published/provided in the following time frames (if other terms and forms of public distribution of information are not established by the Charter, other normative documents of the State Enterprise «NPC «Ukrenergo» and the legislation of Ukraine):

- - in mass media, news agencies and other organizations - no later than 1 (one) business day from the moment of the relevant event;

- - on the website of the State Enterprise «NPC» Ukrenergo «- no later than 1 (one) business day from the moment of the relevant event;

- - on the official pages of the company in social networks - no later than 1 (one) business day from the moment of the relevant event;

- - to the experts - in the form of written comments of the communications unit with the participation of the lead specialists - no later than 3 (three) working days from the moment of receipt of the corresponding request;

- - to scientists - in the form of written comments of the communications unit with the participation of the lead specialists - no later than 3 (three) working days from the moment of receipt of the corresponding request;

- - to citizens - within the terms stipulated by the legislation.

2. Written appeals from the media representatives sent to the SE «NPC» Ukrenergo «or its separate subdivisions shall be immediately forwarded to the Communications Department to determine the methods of responding to them.

It is prohibited to receive questions from the media representatives orally as well as to answer verbally the questions (including telephone) in order to prevent the distribution of incorrect and false information.

3. The head of the communications unit has the right to send appeals received from the media in writing, directly to the heads of structural and separate units, deputy heads and heads of directions.

4. All structural subdivisions, deputy heads, heads of directions of the of SE «NPC «Ukrenergo» are obliged to provide information to the Communications Unit in written and/or electronic form within the terms clearly indicated in the request of the Communications Unit.

5. Provision of a media response on behalf of the SE «NPC «Ukrenergo «is carried out by the Chief Communications and International Cooperation Officer, the head of the communications unit or the person responsible for communications with the media in a separate subdivision, in writing or in electronic form, after agreement with the director

SE «NPC» Ukrenergo «or the person who replaces it, or the head of the relevant separate subdivision.

If it is necessary for the rapid response, it is possible to coordinate the response to a request from media representatives, except for the above-mentioned officials, only with the department of communications.

## VII. POSITIONING

While preparing responses to mass media, public, experts or other organizations' requests, in public performances the Company's Communication unit, other subdivisions or employees should observe such regulations:

### **To comment:**

- providing services on operative dispatch control and transmission of electricity via trunk and interstates power grids;
- cost of services (tariff) provided by the Company and order of their formation and usage;
- extraordinary events if they threaten lives and health of people;
- industrial and economic activity (operation and maintenance of utilities, etc.);
- financial-economic activity (plans and factual use of costs, tariffs, introduction of the new electricity market model, purchases, auctions, etc.);
- realization of social and charitable programs;
- personnel changes of the Company's leaders and its separated divisions;
- approval of programs/plans;
- investment activity (reconstruction, modernization of operating utilities, construction and commissioning of new ones, etc.);
- introduction of informational systems which optimize facilities control and operation;
- international cooperation;
- projects and introduction of new standard acts in power industry's issues;
- receiving certificates, awards, etc.;
- Company's ecologic measures;
- Participation in the Industry's events (conferences, exhibitions, round tables, etc).

### **Not to comment:**

- facts constituting state, service, commercial or other secret protected by the state (classified information);
- personal attitude to the officials at UKRENERGO (including the issues on corporate conflicts, etc.);
- decisions of the state officials, governmental decisions and other authoritative bodies regarding the energy sector providing the relevant assessment of the decisions; limited, if necessary, only by informing about the possible results of certain decisions in the field of energy;
- political issues including those related to the state policy and political leaders;
- activities of the other energy market participants (excluding the situations when the following activity may influence the energy security of the country and the sustainable operation of the Ukrainian energy system).

In case of necessity the CEO at UKRENERGO, Chief Communications and International Cooperation Officer, Head of the Communications Unit may respond to the requests of media via messengers in the social networks, mobile applications, personal e- mail boxes. These responses are considered as those on behalf of the Company when the speaker states directly about this. If there is not any official confirmation as regards to the data transferred via the channels, the data may be considered as the personal opinion.



## **VIII. PUBLIC SPEECHES**

1. Right on the public speeches on behalf of UKRENERGO possesses the CEO at UKRENERGO (his deputy), Chief Communications and International Cooperation Officer as well as the relevant deputy heads, heads of the directions and Head of the Communications Division at UKRENERGO (Annex 1). The other officials and employees of UKRENERGO may publicly speak on behalf of UKRENERGO only in accordance with the approval of the CEO at UKRENERGO and/or Chief Communications Officer.

2. The information on UKRENERGO`s activities presented in course of public speeches of the authorized employees of UKRENERGO is provided within their competencies and in accordance with their functions and duties after a prior approval of the Communications Unit, CEO at the SE "NPC "Ukrenergo" or a person who replaces him.

3. The right on the public speeches on behalf of UKRENERGO as regards to activities and within competency of the UKRENERGO`s certain Division belongs to the head of the UKRENERGO`s separated Division, his deputies or a person responsible for communications with media within a separated Division, however only in case of the speech prior approval with the Communications Division. The other officials and employees of the UKRENERGO`s separated Divisions have the right on public speeches on behalf of the UKRENERGO subdivision regarding activities within their competencies at the national and international conferences, meetings, seminars, sessions, local executive authorities, participation in press- conferences, briefings, phone and video-conferences, public events, interviews, providing the comments for media only after a decision of the head of a separated Division.

4. In case if the false information is provided to media, the SE "NPC "UKRENERGO" Communication Division negotiates this issue with the media in order to disprove the false information.

5. If there is a need to respond to the crisis in UKRENERGO, all responsible persons must act in accordance with the business-process "Reputational risks management".

## **IX. SOCIAL NETWORKS**

SE "NPC "UKRENERGO" promotes and is interested in the activity of its employees in social networks, whereas the following activity is aimed at disclosure of the company's goals and objectives among the partners, customers and the public.

Communicating in social networks, UKRENERGO employees can indicate that they are working in the company and clarify that their statements about the Company's activities are personal opinions.

Company employees must communicate effectively and responsibly in social networks. They should be aware that their words do not violate existing rules of providing information at the enterprise, even if their place of work is not specified in social networking profiles.

Communicating in social networks, UKRENERGO employees shall not:

- share the production secrecy, planned new events and documents that have not been officially announced;
- no one shall disclose financial, production, and legal information about UKRENERGO activities unless it has been officially released prior;
- allow content that discriminates against people on the basis of race, ethnicity, gender, religion or belief;
- admit statements that could have a negative impact on the reputation or brand of the company;



- leave personal comments that could be interpreted, even by mistake, as a comment or statement on behalf of the Company;

- give qualitative assessments to the decisions of the state leadership, the Government and other energy authorities that could be interpreted, even mistakenly, as the company's position;

SE "NPC "UKRENERGO", in its turn, creates all the necessary feedback channels for the Company's employees in order to convey any important information, in their opinion, to the management of UKRENERGO. These communication channels are:

- personal mailbox of the CEO at UKRENERGO [befree@ua.energy](mailto:befree@ua.energy);
- hotline to prevent corrupt actions in UKRENERGO;
- mailboxes and phone numbers of the Chief Communications and International Cooperation Officer as well as those of the Internal Communications Division;
- internal portal;
- corporate publication 50 Hz.

## **X. RESPONSIBILITY**

1. The responsibility for the late and incorrect provision of information to the Communications Unit, as well as for the false and inaccurate information, is born by the heads of the structural divisions of the head office and the separate Divisions that provided information to the Communications Unit.

2. The responsibility for the organization of the press conferences. Round tables and other events with the participation of the media representatives, public and other organizations is born by the Communications Unit. The delegations, representatives of the regional and higher authorities are relocated at the SE "NPC "UKRENERGO" premises; the highlighting of the information is provided by the Communications Unit.

3. Head of division providing the information for the public speeches bears personal responsibility for the accuracy and reliability of the information.

4. Communications Unit is responsible for monitoring of compliance with the Information Policy requirements.

5. Control for complying with the Information Policy requirements is performed by the Chief Communications and International Cooperation Officer at the "SE "NPC "Ukrenergo".