

**PROCEDURE FOR INTERACTION BETWEEN THE CARBON UNITS REGISTRY  
ADMINISTRATOR AND TRADE ORGANIZERS**

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## I. Terms and Definitions

1.1. The following terms and definitions are used in this Interaction Procedure:

Terms	Description
Interaction Agreement	The Interaction Agreement is concluded by the Registry Administrator with the Trade Organizer in accordance with Resolution No. 905 of the Government of the Russian Federation dated Mai 20, 2022 (as amended on November 30,2022) “ <i>On Approval of the Model Form of Agreement for Registry Administrator’s Services on Conducting Transactions in the Carbon Units Registry</i> ”.
Information about Open Accounts and Quantity of Labeled Units	An electronic document generated by the Registry Administrator in accordance with Appendix 2 to this Interaction Procedure and containing, in relation to the persons who submitted the corresponding application to the Registry Administrator, information about the availability of an account in the Carbon Units Registry and the quantity of labeled carbon units in such account.
Client	A participant in the carbon units trading and (or) a regional regulated organization (unless such organization is a participant in the carbon units trading) that has entered into an agreement with the Operator.
Labeling	Allocation of carbon units traded (to be traded) in organized trading out of the Client’s carbon units and (or) greenhouse gas emissions quota fulfillment units (hereinafter referred to as the quota fulfillment unit) on an account in the Carbon Units Registry.
Registry Administrator	The legal entity in charge of keeping the Carbon Units Registry, specifically AO Kontur.
Transaction Day	A period of time during which the data exchange takes place between the Registry Administrator and the Trade Organizer.
Trade Organizer	A person in charge of organized trading services.
Client Interaction Procedure	The procedure established by the Registry Administrator for interaction between the clients and the Registry Administrator in order to trade labeled carbon units and (or) quota fulfillment units during organized trading in accordance with Resolution No. 905 of the Government of the Russian Federation dated Mai 20, 2022 (as amended on November 30, 2022) “ <i>On Approval of the Model Form of Agreement for Registry Administrator’s Services on Conducting Transactions in the Carbon Units Registry</i> ”.
Interaction Procedure	The procedure for interaction between the Registry Administrator and the Trade Organizer under the agreement concluded between them as established in this document.
Rules	Resolution No. 790 of the Government of the Russian Federation dated April 30, 2022 “ <i>On Approval of the Rules for Compiling and Maintaining a Carbon Units Registry and Conducting Transactions with Carbon Units in the Carbon Units Registry</i> ” (as amended on November 30, 2022).
Registry of Contracts	An extract from the registry of contracts concluded on the basis of organized trading, which is maintained by the Trade Organizer in accordance with Part 14 of Article 5 of the Federal Act “ <i>On Organized Trading</i> ” generated in the form of an electronic

	document by the Trade Organizer in accordance with Appendix 2 to this Interaction Procedure.
Registry Administrator's Website	The official website of the Carbon Units Registry Administrator at <a href="http://www.carbonreg.ru">www.carbonreg.ru</a> .
Status of the Registry of Contracts	An electronic document generated by the Registry Administrator in accordance with Appendix 2 to this Interaction Procedure and containing the results obtained by processing the Registry of Contracts.
Status of Information about Open Accounts and Quantity of Labeled Units	An electronic document generated by the Registry Administrator in accordance with Appendix 2 to this Interaction Procedure and containing the results obtained by processing the Information about Open Accounts and Quantity of Labeled Carbon Units.
Trading Participant	A legal entity, individual entrepreneur or individual who is in charge of implementing a climate project, and (or) owns carbon units/quota fulfillment units, and (or) has an account in the Carbon Units Registry.
Form of Interaction Agreement between the Registry Administrator and the Trade Organizer	A model form of a interaction agreement between the Registry Administrator and the Trade Organizer as defined in Appendix 1 to this Interaction Procedure based on the provisions of Resolution No. 905 of the Government of the Russian Federation dated Mai 20, 2022 <i>“On Approval of the Model Form of Agreement for Registry Administrator’s Services on Conducting Transactions in the Carbon Units Registry”</i> (as amended on November 30, 2022).

1.2. The terms and definitions not specifically defined in this Interaction Procedure shall be used in the meanings established in the regulatory legal acts of the Russian Federation.

## II. General Provisions

2.1. This Interaction Procedure has been developed in accordance with Federal Act No. 296-FZ dated July 02, 2021 *“On Mitigating Greenhouse Gas Emissions”*, Resolution No. 905 of the Government of the Russian Federation dated Mai 20, 2022 (as amended on November 30, 2022) *“On Approval of the Model Form of Agreement for Registry Administrator’s Services on Conducting Transactions in the Carbon Units Registry”*, Resolution No. 790 of the Government of the Russian Federation dated April 30, 2022 (as amended on November 30, 2022) *“On Approval of the Rules for Compiling and Maintaining a Carbon Units Registry and Conducting Transactions with Carbon Units in the Carbon Units Registry”*, the legislation of the Russian Federation and the Articles of Association of AO Kontur.

2.2. This document establishes the procedure for interaction between the Registry Administrator and Trade Organizers in relation to:

- The procedure for Trade Organizers to join the Procedure for Interaction between the Registry Administrator of the Carbon Units Registry and Trade Organizers pursuant to Article 428 of the Civil Code of the Russian Federation;
- Submission of information by the Registry Administrator about availability/unavailability of accounts opened to Trading Participants in the Carbon Units Registry as well as the balances and transaction restrictions/blocks on such accounts. The specified information shall be submitted for the purpose of transactions with carbon units (quota fulfillment units) during organized trading; submission of the Registry of Contracts by the Trade Organizers to the Registry Administrator;
- Conditions for posting information on the Registry Administrator’s website;

- Requirements for documents drawn up by the Registry Administrator and Trade Organizers with Trading Participants, and the interaction agreement between the Registry Administrator and Trade Organizer.

2.3. All appendices and annexes to this Interaction Procedure shall form an integral part hereof. The current revision of the Interaction Procedure and all appendices hereto shall be posted by the Registry Administrator on the Registry Administrator's Website.

2.4. The procedure for approval, amendment and entry into force of the Interaction Procedure:

- The Interaction Procedure shall be approved by the Registry Administrator's authorized authority. Any amendments and supplements to the Interaction Procedure shall be made by approving a new revision of the Interaction Procedure.

- The Registry Administrator shall be entitled to amend the Interaction Procedure in the manner established by the effective legislation of the Russian Federation.

- The Interaction Procedure approved by the Registry Administrator, including its new revision, shall be disclosed by posting on the Registry Administrator's Website no later than on the next business day following the approval date of the Procedure.

- The new revision of the Interaction Procedure shall enter into force for all Parties after its approval by the Registry Administrator's authorized authority, but no earlier than five business days following its disclosure by the Registry Administrator by posting on the Registry Administrator's Website.

- The original hard copy of the Interaction Procedure shall be kept at the Registry Administrator's location.

2.5. The Interaction Procedure may be adopted by the Trade Organizer only by acceding to the current revision of the Interaction Procedure as a whole by concluding an Interaction Agreement between the Registry Administrator and the Trade Organizer.

2.6. The Trade Organizer shall send an application to state its intent to conclude an Interaction Agreement to the Registry Administrator at the address indicated on the Registry Administrator's Website.

### **III. Transaction Day**

3.1. The data exchange between the Registry Administrator and the Trade Organizer shall be carried out on every business day from 10:00 until 17:00, Moscow time, and shall include the following:

- Submission of the Information about Open Accounts and Quantity of Labeled Carbon Units by the Registry Administrator to the Trade Organizer until 10:00 in relation to the persons who filed the corresponding application to the Registry Administrator

- Submission to the Trade Organizer of the Status of Information about Open Accounts and Quantity of Labeled Carbon Units against a notice on receipt of such information no later than 10:30

- Submission of the Registry of Contracts by the Trade Organizer to the Registry Administrator:

- From 10:00 until 11:00, if no trading takes place on that day

- From 13:00 until 15:00, if trading takes place on that day

- Sending confirmation of receipt of the Registry of Contracts in the form provided for by Diadoc electronic document management system or another information system operated by an entity that meets the requirements approved by the federal executive authority authorized to exercise control and supervision in the field of taxes and charges no later than 30 minutes following its receipt

- Submission of the Status of the Registry of Contracts by the Registry Administrator to the Trade Organizer from 15:00 until 17:00.

3.2. A different data exchange period and procedure may be established upon agreement between the Registry Administrator and the Trade Organizer due to the announcement of a technical failure / emergency for one of the above.

#### **IV. Data Exchange between the Registry Administrator and the Trade Organizer**

4.1. Data exchange between the Registry Administrator and the Trade Organizer shall be carried out via electronic messages in accordance with the Specifications for Electronic Documents used by the Registry Administrator in the course of interaction with the Trade Organizer as provided for in Appendix 2 to this Interaction Procedure.

4.2. Data exchange shall be carried out in the form of electronic document exchange via Diadoc electronic document management system or another information system operated by an entity that meets the requirements approved by the federal executive authority authorized to exercise control and supervision in the field of taxes and charges.

#### **V. Submission of Information about Open Accounts and Quantity of Labeled Units**

5.1. If there is an effective Interaction Agreement with the Trade Organizer, the Registry Administrator shall send Information about Open Accounts and Quantity of Labeled Units containing information about the Trading Participants who have opened an account in the Carbon Units Registry and who have filed the corresponding application with the Registry Administrator, along with information about the quantity of labeled carbon units and/or quota fulfillment units on such account. The Information about Open Accounts and Quantity of Labeled Units is valid as of the date of its generation. The Registry Administrator shall submit information only about those accounts opened to the Trading Participants, for which the operations are not limited or suspended at the time of generation of the corresponding message.

5.2. Upon receiving the Information about Open Accounts and Quantity of Labeled Units, the Trade Organizer shall send the Status of the Information about Open Accounts and Quantity of Labeled Units to the Registry Administrator.

#### **VI. Submission of the Registry of Contracts**

6.1. The Trade Organizer shall send the Registry of Contracts to the Registry Administrator to enable the Registry Administrator to carry out transactions in the Carbon Units Registry for the transfer of carbon units and (or) quota fulfillment units from one account to another (hereinafter referred to as the Transaction(s)). The Registry of Contracts shall be sent by the Trade Organizer regardless of whether or not it conducts any trading on the specified day, with the exception of weekends and holidays, and shall confirm, among other things, the date starting from which it is possible to fulfill the applications received by the Registry Administrator to stop the Labeling of carbon units and/or quota fulfillment units.

6.2. Upon receiving the Registry of Contracts, the Registry Administrator shall check it for compliance with the forms specified in Appendix 2 to this Interaction Procedure, and also check the availability of an effective Interaction Agreement between the Registry Administrator and the Trade Organizer. If the Registry of Contracts contains an order for the transfer of carbon units and (or) quota fulfillment units between the Trading Participants based on a contract concluded during organized trading, the Registry Administrator shall carry out the Transactions in the Carbon Units Registry in accordance with the data in the Registry of Contracts.

6.3. The Registry Administrator shall send the Status of the Registry of Contracts to the Trade Organizer containing the results obtained by processing the Registry of Contracts and conducting the Transaction.

6.4. The Registry Administrator shall refuse to execute the Registry of Contracts in the following cases:

- Inconsistency of the Registry of Contracts with the forms specified in Appendix 2 to this Interaction Procedure
- Technical errors when filling out the Registry of Contracts
- Other cases in which the execution of the Registry of Contracts contradicts this Interaction Procedure or the effective legislation.

6.5. The Registry Administrator shall be entitled to refuse to execute the Registry of Contracts if:

- The Registry of Contracts was received after 15:00, unless a different data exchange period and procedure (as opposed to Section III *Transaction Day* of the Interaction Procedure) was established upon agreement between the Registry Administrator and the Trade Organizer due to the announcement of a technical failure/emergency for one of the above.

6.6. The Registry Administrator shall refuse to conduct any Transactions in the Carbon Units Registry in the following cases:

- The Trading Participant does not have an account as confirmed by a message sent by the Registry Administrator about the availability of open accounts and the balances on such accounts, including due to transaction restrictions on the account, including the cases when the account owner has outstanding payments due for the Registry Administrator's services
- The account of the seller and (or) the buyer cannot be identified
- An order has been received from an authorized authority resulting in account blocking / prohibition of transactions
- The seller's account does not have the appropriate quantity of labeled carbon units (quota fulfillment units) in relation to the Trade Organizer, whose trading resulted in the conclusion of the contract specified in the Registry of Contracts received by the Registry Administrator
- Other cases in which the Transaction contradicts this Interaction Procedure or the effective legislation.

6.7. In case the Trade Organizer receives a refusal to execute the Registry of Contracts or Transaction(s) from the Registry Administrator, the Trade Organizer shall send one of the following electronic messages to the Registry Administrator generated in accordance with Appendix 2 to this Interaction Procedure:

- On data exchange completion
- On submission of a new Registry of Contracts.

6.8. The Data Exchange Completion Message shall be sent by the Trade Organizer unless a new Registry of Contracts is sent during the current day to eliminate the reasons for refusal to conduct the Transaction(s).

6.9. In response to the Data Exchange Completion Message, the Registry Administrator shall send the Status of the Data Exchange Completion Message in accordance with Appendix 2 to this Interaction Procedure. The Registry Administrator shall also refuse to accept the Data Exchange Completion Message if the form of the Data Exchange Completion Message does not comply with Appendix 2 to this Interaction Procedure.

6.10. The new Registry of Contracts shall be sent by the Trade Organizer to the Registry Administrator in order to eliminate the reasons for the refusal to execute the Registry of Contracts or conduct the Transaction(s).

6.11. The Registry of Contracts sent by the Trade Organizer to the Registry Administrator in order to eliminate the reasons for the refusal to conduct the Transactions shall contain the information necessary only to conduct the Transactions not conducted by the Registry Administrator.

## **VII. Conditions for Posting Information on the Registry Administrator's Website**

7.1. The Registry Administrator shall post information on its official website in accordance with Resolution No. 790 of the Government of the Russian Federation dated April 30, 2022 "*On Approval of the Rules for Compiling and Maintaining a Carbon Units Registry and Conducting Transactions with Carbon Units in the Carbon Units Registry*".

7.2. The Trade Organizer shall receive information about carbon units (quota fulfillment units) issued for trading on the Registry Administrator's official website.

## **VIII. Requirements for Documents Prepared by the Registry Administrator and the Trade Organizers with Trading Participants and the Interaction Agreement between the Registry Administrator and the Trade Organizer**

8.1. The Registry Administrator shall envisage the following provisions in the Procedure for Interaction with Clients during Organized Trading of Marked Carbon Units and/or Quota Fulfillment Units:

8.1.1. Labeling Application shall mean the following:

- Consent of the Trading Participant to the provision by the Registry Administrator of the information contained in the application to the Trade Organizer as specified in the request
- Consent of the Trading Participant to withdraw and credit carbon units and (or) quota fulfillment units in accordance with the Registry of Contracts received from the Trade Organizer
- Consent of the Trading Participant that all carbon units and (or) quota fulfillment units credited to its account as specified in the Registry of Contracts will be automatically Labeled under the Trade Organizer who sent the Registry of Contracts to the Registry Administrator, and in order to stop their Labeling, the Trading Participant shall submit the corresponding request to the Registry Administrator.

8.1.2. The Labeling Request may indicate a specific quantity of carbon units and/or quota fulfillment units on the account that are to be sold via the Trade Organizer.

8.1.3. The Labeling Termination Application shall indicate the specific quantity of carbon units and (or) quota fulfillment units on the account, for which Labeling is to be terminated in relation to the selected Trade Organizer.



8.1.4. The Labeling Termination Request may contain the following:

- An indication that, along with the termination of Labeling in relation to a Trade Organizer, it is necessary to Label the specified quantity of carbon units and (or) quota fulfillment units in relation to another Trade Organizer

- Withdrawal of consent for the Registry Administrator to provide information to the Trade Organizer (only if there are no labeled carbon units and/or quota fulfillment units on the account in relation to the Trade Organizer or if the request simultaneously contains an instruction to terminate the Labeling for all units on the account in relation to such Trade Organizer).

8.1.5. The deadline for the Registry Administrator to fulfill a Labeling Request or Labeling Termination Request, taking into account that:

- The Labeling Request shall be fulfilled by the Registry Administrator within 5 business days

- The Labeling Termination Request may be fulfilled by the Registry Administrator upon execution of the Transactions in the Carbon Units Registry. Moreover, if the Registry of Contracts indicates a contract under which execution for money is expected (with the status indicated as “in progress”), the Labeling shall be terminated either upon executing the Transaction under such contract or upon receiving information about an event of default under such contract, but in any case no later than 3 business days following the date of receiving the Labeling Termination Request.

8.1.6. Grounds for refusal to fulfill a Labeling Request or Labeling Termination Request:

- The account holder’s outstanding debt for the Registry Administrator’s services
- Absence of the corresponding quantity of carbon units or quota fulfillment units in the applicant’s account.

8.2. The Registry Administrator shall interact with the Trade Organizers in accordance with the Interaction Agreement, which is an accession agreement to this Interaction Procedure. The Interaction Agreement shall be concluded by the Registry Administrator with the Trade Organizers in the form provided for in Appendix 1 to this Interaction Procedure. In addition to the terms and conditions provided for in the specified form of agreement, the Interaction Agreement concluded by the Registry Administrator with the Trade Organizer shall establish the following:

8.2.1. Information exchange procedure: electronic information exchange method, electronic message formats, electronic message sending and processing deadlines, specifically the indication that the Transaction related to the receipt by the Registry Administrator of the Registry of Contracts shall be executed by the Registry Administrator on the day of its receipt from the Trade Organizers in the manner and within the deadlines established in accordance with Section III of the Interaction Procedure (*Transaction Day*).

8.3. The Trade Organizers shall ensure that the regulations or contracts concluded by the Trade Organizer with the Clients who are Trading Participants contain the requirement for the Trading Participant to give its consent to the Trade Organizer to provide information about such Trading Participant to the Registry Administrator.

IX. Appendix 1 to the Procedure for  
Interaction between the Carbon Units  
Registry Administrator and Trade  
Organizers

I. Model Form of an Interaction Agreement between the Registry Administrator and the Trade  
Organizer  
Start of Form of Agreement

**Interaction Agreement between the Carbon Units Registry Administrator and the Trade  
Organizer**

Moscow \_\_\_\_\_, \_\_\_\_\_

Party to the Agreement	Full name
<b>Registry Administrator</b>	AO Kontur
<b>Trade Organizer</b>	

1. This Agreement is concluded between the Registry Administrator and the Trade Organizer, hereinafter collectively referred to as the Parties, under the procedure of the Trade Organizer's accession to the Procedure for Interaction between the Carbon Units Registry Administrator and Trade Organizers (hereinafter referred to as the Interaction Procedure) in accordance with Article 428 of the Civil Code of the Russian Federation. The interaction procedure and the rates for the Registry Administrator's services are posted on the Registry Administrator's official website. The terms used in this Agreement shall be interpreted in accordance with the provisions of the Interaction Procedure and the legislation of the Russian Federation.
2. The Interaction Procedure establishes the rights and obligations of the Parties to this Agreement for the exchange of information necessary to execute transactions in the carbon unit registry, the composition and format of the exchanged information, the information exchange deadlines and procedure.
3. The Registry Administrator shall be entitled to unilaterally amend the Interaction Procedure.
4. This Agreement shall enter into force from the date of its signing by the Parties.
5. This Agreement shall terminate once the Trade Organizer ceases to conduct organized trading in carbon units and/or quota fulfillment units or from the date when the Registry Administrator loses its status as a carbon units registry administrator in accordance with the legislation of the Russian Federation, and as agreed by the Parties. The Trade Organizer shall be entitled at any time to unilaterally withdraw from the Agreement out of court by notifying the Registry Administrator. The Agreement shall terminate upon expiration of 30 calendar days from the date when the Registry Administrator receives the corresponding notice. The expiration of the Agreement shall not relieve the Trade Organizer from its obligations to pay for the services or from the imposition of contractual penalties for late payment. A notice on termination hereof shall be published by the Parties on their official websites 10 calendar days before the termination date hereof, indicating the period for termination.
6. The Parties shall be entitled to resolve all disputes related to the conclusion, interpretation, execution and termination hereof by means of negotiations. The negotiations shall be initiated by the concerned Party by sending a written request for negotiations to the other Party. Within 5 calendar days following the date of receipt of a written request for negotiations by any of the Parties, the Parties shall agree on the date and place of negotiations.
7. During the negotiations, the Parties undertake to make every effort in good faith to amicably resolve the dispute. Based on the negotiations, the Parties shall draw up the minutes, which

- shall include the information about the date, time and place of the negotiations, information about the representatives of each Party, the meeting agenda and the obtained results.
8. In case of failure to reach an agreement during negotiations or failure to hold negotiations within 14 days, the concerned Party shall send a claim to the other Party in writing.
  9. The claim shall be submitted by any of the methods specified in clause 12 of the Agreement. The claim shall be accompanied by the documents substantiating the demands made by the concerned Party, including the documents confirming the amount of damage caused and the authority of the person who signed the claim. The documents confirming the authority to sign the claim shall be submitted in the form of original documents or notarized copies. If the documents are sent in electronic form, they shall be signed with an enhanced qualified electronic signature of the Party or its authorized representative. A claim not supported by any documents confirming the authority of the person who signed such claim shall be deemed not submitted and not subject to consideration.
  10. If the Parties cannot resolve disputes under the pre-trial procedure within 30 calendar days from the date of receipt of a letter of claim (claim) by either Party, the disputes shall be subject to review through a legal action in the Moscow Arbitration Court in accordance with the legislation of the Russian Federation.
  11. For any other issues not regulated by this Agreement, the Parties shall be governed by the provisions of the effective legislation of the Russian Federation.
  12. Unless otherwise specified in the Agreement, the Parties shall exchange applications, notices and other documents under the Agreement by sending documents signed with an enhanced qualified electronic signature of the Party (its representative) to the Participant's email address specified in the Agreement; by registered mail with return receipt requested; by courier delivery (in this case, the list of received documents and the date of their receipt shall be confirmed by the person who received such documents, indicating the last name, first name, patronymic (if any) and position in the receipt (notice) or any other document issued upon delivery). The documents shall be deemed as properly sent and legally binding for the Parties when they are sent in any of the ways provided for in this clause of the Agreement.
  13. Each Party represents to the other Party that it has full legal capacity to enter into the Agreement and fulfill all obligations established herein, including that the Party has obtained all necessary permits and approvals necessary in accordance with the legislation of the Russian Federation, applicable law and constituent documents. The representations about the circumstances provided by the Parties shall be material to the Parties.
  14. The Agreement shall be signed in paper copy (in two copies) or with enhanced qualified electronic signatures of the Parties (representatives of the Parties) via an electronic document management system operated by an entity that meets the requirements approved by the federal executive authority authorized to exercise control and supervision in the field of taxes and charges. The Parties agreed to use a similar procedure for signing amendment agreements to contracts, protocols of disagreements/interaction of disagreements/reconciliation of disagreements.
  15. The Parties shall post changes to their details on their official websites.
  16. Details of the Parties:

Register Administrator	Trade Organizer
Registered address: 63 Novocheremushkinskaya Street, Floor 4, Office X, Room 77, Cheremushki City Municipal District, Moscow, 117418  Postal address: 9 Moskvoretskaya Embankment, bld. 1, Moscow, 109240  OGRN 5187746013505 INN 9731019998	

KPP 772701001 Email: <a href="mailto:info@carbonreg.ru">info@carbonreg.ru</a> Bank details: BANK GPB (JSC) Settlement Account No. 40702810700000012357 Correspondent Account No. 30101810200000000823 BIC 44525823	
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For the Registry Administrator

For the Trade Organizer

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\* In case the Agreement is drawn up in paper copy, the seals of the Parties shall be affixed hereto (if any).

End of Form of Agreement