

**PROCEDURE FOR INTERACTION BETWEEN THE REGISTRY  
ADMINISTRATOR AND A CLIENT WHO IS A FOREIGN LEGAL ENTITY WITHOUT  
A PERMANENT REPRESENTATIVE OFFICE IN THE RUSSIAN FEDERATION, OR A  
FOREIGN CITIZEN**

Table of Contents

I.	Terms and Definitions .....	3
II.	General Provisions.....	7
III.	Procedure for Interaction via Electronic Interaction Information System.....	7
IV.	Client Identification .....	9
V.	Procedure for Model Agreement Conclusion and Termination .....	9
VI.	Procedure for Account Transactions .....	10

## I. Terms and Definitions

1.1 For the purposes of this Procedure for Interaction between the Registry Administrator and a Participant who is a Foreign Legal Entity without a Permanent Representative Office in the Russian Federation, or a Foreign Citizen (hereinafter referred to as the Procedure), the following terms and definitions shall apply:

<b>Terms</b>	<b>Description</b>
Apostille	A stamp affixed by a competent authority to a Russian formal document or to a separate sheet attached to that document, certifying the authenticity of the signature and position of the person signing the document and, where appropriate, the authenticity of the seal or stamp affixed to the document.
Unified Portal of State and Municipal Services	The Unified Portal of State and Municipal Services is a federal state information system that ensures the provision of state and municipal services in electronic form and access of applicants to information about state and municipal services intended for distribution using the Internet information and telecommunications network and posted in state and municipal information systems that ensure maintenance of registries of state and municipal services, respectively (Unified Portal).
Act “ <i>On Electronic Signature</i> ”	Federal Act No. 63-FZ dated April 06, 2011 “ <i>On Electronic Signature</i> ”.
Request	A labeling request or a labeling termination request, based on which the transactions shall be conducted in the Carbon Units Registry in accordance with Resolution No. 905 of the Government of the Russian Federation dated Mai 20, 2022 (as amended on September 28, 2023) “ <i>On Approval of the Model Form of Agreement for Registry Administrator’s Services on Conducting Transactions in the Carbon Unit Registry</i> ”.
Application	An application of the Foreign Client, based on which the transactions shall be conducted in the Carbon Units Registry in accordance with the Rules for Compiling and Maintaining a Carbon Units Registry and Conducting Transactions with Carbon Units in the Carbon Units Registry approved by 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> ”.
Identification	A package of measures to identify information about the Foreign Client or its representative to confirm the authenticity of this information using original documents and (or) duly certified copies.

Foreign Client	A participant in the trading of carbon units (a foreign legal entity without a permanent representative office in the Russian Federation, or a foreign citizen), who has concluded a Model Agreement.
Electronic Document Management Information System	An information system of the Verification Center used to support the electronic document management process between the Registry Administrator and the Foreign Client.
Enhanced Qualified Digital Signature (EQDS)	An electronic signature, which corresponds to all features of an encrypted non-certified digital signature and the following additional features: 1) The electronic signature verification key is indicated in the qualified certificate 2) To create and verify an electronic signature, the electronic signature tools are used that are proven to comply with the requirements established in the Federal Act “ <i>On Electronic Signature</i> ”.
Encrypted Non-certified Digital Signature (NDS)	An electronic signature, which: 1) Results from cryptographic transformation of information using an electronic signature key 2) Enables to determine the person who signed the electronic document 3) Enables to detect the actual changes introduced into an electronic document after its signing 4) Is generated using electronic signature tools.
Trade Organizer	A person in charge of organized trading services.
Interaction Procedure	The procedure for interaction between the Foreign Client and the Registry Administrator established herein.
Registry Rules	Resolution No. 790 of the Government of the Russian Federation dated April 30, 2022 (as amended on September 28, 2023) “ <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> ”.
Simple Electronic Signature	An electronic signature that, with the use of codes, passwords or other means, confirms the actual generation of an electronic signature by a certain person.
Order	An order of the Foreign Client to conduct a transaction with carbon units and (or) quota fulfillment units (except for the transaction of crediting the account with quota fulfillment units issued due to the fulfillment of the established quota by a regional regulated organization in accordance with part 14 of Article 8 of Federal Act “ <i>On Conducting an Experiment to Mitigate Greenhouse Gas Emissions in Certain Constituent Entities of the Russian Federation</i> ”) according to an account in the carbon units registry, certified by an enhanced qualified digital signature.
Registry	An information system intended to register climate projects and record carbon units and transactions with carbon units.
Registry Administrator’s	The Registry Administrator’s official website at <a href="http://www.carbonreg.ru">www.carbonreg.ru</a> .

Website	
Carbon Units Transaction	A transaction involving carbon units in the form of an agreement or any other transaction in accordance with the Civil Code of the Russian Federation concluded in order to transfer carbon units.
Verification Center Tools	Software and (or) hardware used to implement the functions of a verification center.
Tariffs	The amount of the fee for the operator's services calculated in accordance with the procedure for determining the fee for the operator's services established in accordance with part 5 of Article 10 of the Federal Act " <i>On Mitigating Greenhouse Gas Emissions</i> " (hereinafter referred to as the Federal Act), and posted on the website.
Model Agreement	The Agreement for Registry Administrator's Services on Conducting Transactions in the Carbon Units Registry concluded by the Client with the Registry Administrator pursuant to the provisions of Resolution No. 905 of the Government of the Russian Federation dated Mai 20, 2022 (as amended on September 28, 2023) and 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 September 28, 2023).
Tripartite Agreement	The agreement between the Foreign Client, the Registry Administrator and the Verification Center regulating the relations in the field of use of electronic signatures, which establishes the procedure for exchange of information in electronic form and the cases when information in electronic form signed with a Qualified or Simple Electronic Signature is recognized as an electronic document equivalent to a hard copy document signed with a handwritten signature.
Carbon Units	Carbon units and quota fulfillment units.
Verification Center	An accredited trusted third party that verifies compliance of electronic signatures and performs other functions provided for in the Agreement.
Services	The services on conducting transactions in the carbon units registry, including transactions with carbon units and (or) quota fulfillment units on an account in the specified registry.
Electronic Interaction Participants	For the purposes of this Interaction Procedure, the Electronic Interaction Participants shall mean the Foreign Client, the Operator and the Verification Center.
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, and (or) has an account in the Carbon Units Registry.
Records	Source records (invoices, service completion documents and other documents provided for by the laws of the Russian Federation or the Agreement), tax accounting forms and documents (if any), including invoices and adjustment invoices.
Electronic Signature	Information in electronic form that is attached to or

	otherwise linked to other information in electronic form (signed information) that is used to identify the person signing such information.
Electronic Interaction	Exchange of information in electronic form and verification of compliance of an electronic signature generated in accordance with the laws of a foreign state and international standards.

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. 63-FZ dated April 06, 2011 “*On Electronic Signature*”, Resolution No. 790 of the Government of the Russian Federation dated April 30, 2022 (as amended on September 28, 2023) “*On Approval of the Rules for Compiling and Maintaining a Carbon Units Registry and Conducting Transactions with Carbon Units in the Carbon Units Registry*”, Resolution No. 905 of the Government of the Russian Federation dated Mai 20, 2022 (as amended on September 28, 2023) “*On Approval of the Model Form of Agreement for Registry Administrator’s Services on Conducting Transactions in the Carbon Units Registry*” (hereinafter collectively referred to as “Rules”).

2.2 This document establishes the procedure and conditions for the interaction of the Registry Administrator with a foreign legal entity without a permanent representative office in the Russian Federation and a foreign citizen (hereinafter referred to as the Foreign Client).

2.3 The current revision of the Interaction Procedure is posted at: <https://carbonreg.ru/> in the *Foreign Clients* section. The Foreign Client shall independently check for any changes to the Procedure on the Website. It shall be the Foreign Client’s responsibility to obtain this information.

2.4 This Procedure is a standard procedure applicable to all Foreign Clients. In accordance with this Procedure, the Registry Administrator shall create equal opportunities for all Foreign Clients with regard to granting access to the Registry.

2.5 In case of amendments to the Rules that do not require amendments to this Procedure, the revision of the Rules specified in clause 2.1 does not need to be updated, but the current revision of the Rules shall apply. If any amendments are introduced to the Rules that require amendments to this Procedure, the Registry Administrator shall introduce the corresponding amendments to this Procedure no later than the effective date of the amendments. In the event of a conflict between this Procedure and the Rules, the Procedure shall be applied to the extent that does not contradict the Rules.

2.6 The Registry Administrator shall be entitled to unilaterally amend this Procedure. The amendments to the Procedure shall be communicated by the Registry Administrator by posting a new revision of the Procedure on the Website. These rules shall enter into force no earlier than 5 calendar days following the date of their publication.

## III. Procedure for Interaction via Electronic Interaction Information System

3.1 Electronic interaction between the Registry Administrator and the Foreign Client, provided that the Foreign Client does not have an enhanced qualified digital signature and (or) access to the unified portal, shall be possible if the electronic signature generated in accordance with the laws of a foreign state and international standards is validated in the manner established in this section.

3.2 This section defines the procedure for using electronic signatures of the Foreign Client generated in accordance with the laws of a foreign state and international standards and describes the procedure for exchanging information in order to comply with the requirements of Article 7 of the Act “*On Electronic Signature*” and the Rules.

3.3 The documents sent to the Registry Administrator by the Foreign Client may be signed with an electronic signature generated in accordance with the laws of a foreign state and international standards and may be applied in the legal relations between the Registry Administrator and the Foreign Client under an agreement between the same. In this case,

electronic signatures shall be verified subject to confirmation by an accredited Verification Center that the electronic signatures comply with the requirements of the specified agreement.

3.4 In order for the Verification Center to verify an electronic signature generated in accordance with the laws of a foreign state and international standards, the Verification Center, the Registry Administrator and the Foreign Client shall sign the Tripartite Agreement on the Procedure and Scope of Application of Electronic Signatures (hereinafter referred to as the Tripartite Agreement), which requires the following actions:

3.4.1 The Foreign Client shall go to the *Foreign Clients* section of the Registry Administrator's website and study the functionality of the Registry and the documents regulating the operation of the Registry, including this Procedure.

3.4.2 If a Foreign Client decides to become a client of the Registry, it shall go to the *International Document Management* section of the Website and follow the link: <https://sbis.ru/edo/international> to fill out its data in the application.

3.4.3 Upon receiving the application, the Verification Center shall contact the Foreign Client via one of the communication channels specified in the application and send the draft Tripartite Agreement in electronic form to be signed by the Foreign Client.

3.4.4 The Foreign Client shall fill out all necessary details in the Tripartite Agreement (name of the Foreign Client, details of the person signing the Agreement, place of residence or location of the foreign company, bank details, correspondence address) and send the Tripartite Agreement signed by an authorized official of a foreign legal entity or a foreign citizen addressed to the Registry Administrator in three (3) original copies by any postal or courier service that it considers convenient.

3.4.5 The duly executed and certified documents confirming the legal capacity of the foreign legal entity / foreign citizen, the powers of the official who signed the Tripartite Agreement in accordance with the requirements set out in Part IV of this Procedure shall be attached to the Tripartite Agreement to identify the Foreign Client.

3.4.6 The Registry Administrator shall review the documents received from the Foreign Client to check compliance with the requirements enabling the Registry Administrator to identify the Client and establish its legal capacity, sign three copies of the Agreement and send them to the Verification Center by any postal or courier service that it considers convenient.

3.4.7 The Verification Center shall sign three copies of the Tripartite Agreement and send one copy to the Registry Administrator and the second copy to the Foreign Client by any postal or courier service that it considers convenient to the addresses specified in the Tripartite Agreement.

3.4.8 The Foreign Client shall receive the confirmation from the Verification Center at the email address specified during registration that the Tripartite Agreement has entered into force and the technical readiness has been achieved to carry out Electronic Interaction, which contains a link to access the Electronic Document Management Information System at <https://sbis.ru/edo/international>. Upon registration of the Foreign Client, the Verification Center shall issue an encrypted Non-certified Digital Signature to the authorized person of the Foreign Client. Registration of the Foreign Client in the Electronic Document Management Information System shall be completed by setting up a personal account and passing a training session on Electronic Interaction.

3.5 The Electronic Interaction shall be carried out via the Electronic Document Management Information System on the basis of the Tripartite Agreement concluded between the Registry Administrator, the Foreign Client and the Verification Center.



#### **IV. Client Identification**

4.1 The Foreign Client shall submit the following documents to the Registry Administrator for the purpose of identification and legal capacity verification:

4.1.1. In relation to a foreign legal entity without a permanent representative office in the Russian Federation:

4.1.1.1. An extract from the trade register of the country of incorporation of the Foreign Client, or another equivalent document issued by the government authorities of that country, containing the registration number of the legal entity. The document shall be issued no earlier than one (1) month before it is submitted to the Registry Administrator.

4.1.1.2. Personal identification documents of the persons authorized to:

- Act on behalf of the Foreign Client without a power of attorney
- Sign documents on behalf of the Foreign Client under a power of attorney.

4.2. In relation to the Client who is a foreign citizen:

- Personal identification document of the foreign citizen.

4.3. Power of attorney issued for the representative of the Foreign Client certified by a notary public if the documents are signed under a power of attorney.

4.4. Documents issued by the competent authorities of foreign countries shall be accepted by the Registry Administrator provided that they are duly legalized as follows:

- For member states of the Hague Convention: by affixing an Apostille
- By means of consular legalization.

4.5. Documents drawn up in a foreign language, in whole or in part, shall be accompanied with a notarized translation into Russian.

4.6. A seal impression shall be affixed to documents if available.

#### **V. Procedure for Model Agreement Conclusion and Termination**

5.1. The Registry Administrator shall conduct transactions in the registry after the Foreign Client accedes to the Model Agreement for Registry Administrator's Services on Conducting Transactions in the Carbon Units Registry (Appendix No. 1 to this Procedure). The Model Form of Agreement form is also posted on the Registry Administrator's website at <https://carbonreg.ru/ru/services/>.

5.2. In order to accede to the Model Agreement, the Foreign Client shall fill out an application for accession in Russian, which is available on the Registry Administrator's website, indicating the following data:

5.2.1. In relation to a legal entity:

- Name
- Form of incorporation
- Registration number, according to an extract from the trade register of the country of incorporation of the foreign client or another equivalent document issued by the government authorities of that country
- Date of state registration (if available)
- Registered address
- Taxpayer identification number (if available)
- Information about the types of economic activities (if available).

5.2.2. In relation to a foreign citizen:

- Last name, first name and patronymic (if any)

- Type, series, number and date of issue of the personal identification document
- Date of birth
- Place of residence
- Insurance number of an individual personal account (if available)
- Taxpayer identification number (if available).

5.3. The application for accession shall be sent to the Registry Administrator through the Electronic Document Management Information System in the form of an electronic pdf document signed by the NDS of the authorized person of the Foreign Client.

5.4. No later than 2 business days from the date of receiving the application for accession to the Agreement, the Registry Administrator shall send a notice to the Foreign Client via the Electronic Document Management Information System about the conclusion of the Agreement, signed by the enhanced EQDS of the authorized person of the Registry Administrator.

5.5. The Agreement shall be valid until December 31 (inclusive) of the year in which the Agreement was concluded. The Agreement shall be deemed extended for each subsequent calendar year if neither party, one calendar month before the expiry of each calendar year, sends a written notice to the other party via the Electronic Interaction Information System, signed by the Unqualified Signature of an authorized person of the Foreign Client, about the refusal to extend the Agreement.

5.6. A notice on refusal to extend the Agreement shall be handed over to the party's representative or sent by registered mail (courier delivery service) to the party's postal address or via the Electronic Interaction Information System.

## **VI. Procedure for Account Transactions**

5.7. The Foreign Client may conduct the following transactions in the Carbon Units Registry via the Electronic Document Management Information System using the Foreign Client's NDS:

- Opening and closing an account in the Registry
- Introducing changes to the data (information) about a carbon units trading participant
- Filing labeling or labeling termination request
- Obtaining an extract from the Registry.

5.8. The Foreign Client may conduct the following transactions in the Carbon Units Registry via the Electronic Document Management Information System using the EQDS of the Foreign Client's representative:

- Issuing orders on transfer of carbon units
- Issuing orders on offset of carbon units.

5.9. The transactions on the account in the Carbon Units Registry related to the transactions with carbon units that are concluded during organized trading shall be carried out in accordance with the Procedure for Interaction between the Client and the Registry Administrator for Trading Labeled Carbon Units and (or) Quota Fulfillment Units during Organized Trading duly approved by the Registry Administrator and posted on the Registry Administrator's Website at <https://carbonreg.ru/ru/exchanges/list/> (hereinafter referred to as the Procedure for Interaction with the Client). The Procedure for Interaction with the Client shall be applied taking into account the provisions of this Procedure, which provides for interaction via the Electronic Document Management Information System.

5.10. The list of Trade Organizers who have effective agreements with the Registry

Administrator is posted on the website at <https://carbonreg.ru/ru/exchanges/list/>.

## **VII. Terms of Payment**

7.1 The payments for the Registry Administrator's services shall be made in accordance with the Rates for the Carbon Units Registry Administrator's services accepted according to Resolution No. 518 of the Government of the Russian Federation dated March 30, 2022 "*On the Procedure for Determining the Fee for the Registry Administrator's Services on Conducting Transactions in the Carbon Units Registry*" (as amended on September 28, 2023). The Foreign Client can view the Tariffs on the Registry Administrator's Website at <https://carbonreg.ru/ru/tariff/#calculator>.

7.2 The terms of payment are established in the Rules.

7.6 The Records shall be sent to the Foreign Client in the form of electronic documents via the Electronic Document Management Information System.

## **VIII. Service Period**

8.1 The Registry Administrator shall provide the Services during the period specified in the Rules.