



CorreggioNET

energy compliance

"One-stop-shop for European regulation and market rules compliance"

QUESTIONS & ANSWERS DOCUMENT

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1. What is CorreggioNET?

CorreggioNET (CN) is a platform designed from the bottom up to assist energy market participants to understand and comply with regulatory obligations applicable to energy trading across 32 jurisdictions in Europe. This comprehensive approach helps energy traders reduce compliance costs and stay informed about regulatory changes.

The CN platform offers users a regulatory monitoring service, which strives to make operational compliance more cost-effective and reliable. The CN platform will become your deskside-tool to complement your current regulatory compliance systems, providing a one-stop-shop for regulatory information across multiple jurisdictions. The CN platform brings innovation to this technical area and achieves extensive cost savings across the energy market by consolidating the individual services typically offered to market participants by multiple law firms and energy consultants into a single, unified solution.

The core functionality of the CN platform is twofold:

- → Firstly, to assist wholesale energy traders seeking to enter a new gas or electricity market to understand the relevant licensing and permission requirements in that market (**Pre-Market Entry Compliance**), and
- → Secondly to guide established traders through their continuing regulatory obligations (**Post-Market Entry Compliance**).

• Pre-Market Entry Compliance

Pre-Market Entry Reports (PMER) help energy trading companies understand the regulatory environment and meet compliance requirements before becoming active in a particular market. It provides comprehensive information about market entry requirements, including licensing conditions for trading power and/or natural gas. This service aims to facilitate access to new energy markets by offering detailed and up-to-date regulatory information, ensuring companies are fully prepared for market entry. For example, our reports cover general hubs and market platforms information, gas and electricity transportation rules and relevant tariffs. Each report is available to order on an instruction basis and is based on the same set of questions, following the same structure.

• Post-Market Entry Compliance

Our platform also offers market participants guidance on how to implement ongoing reporting and other regulatory obligations in each of the covered jurisdictions via our Post-Market Entry Guides (PMEGs). We do this by providing information about the scope of any applicable obligation, supported by templates and forms in their original form. We aim to translate most of the relevant forms into English.



In addition to the PMEGs, the service features five key elements to support your business:

- *CN Regulatory Hotline:* is a service which provides CN subscribers with a direct line to a regulatory specialist who is available to assist with individual questions regarding CN platform content. We strive to answer any regulatory question you may have within 2 working days. The CN Regulatory Hotline service is included in any CN subscription and is not charged additionally, for questions which fall within the scope of CN content (energy market legislation and regulation). Our users inform us every year that the Regulatory Hotline service is the feature which adds value to them, as they can obtain a clarification or an answer to a question quickly and reliably and with no additional costs or the need to instruct.
- *CN Alert:* is an automatic alert tool with due dates for compliance obligations (such as reporting obligations to national regulatory agencies, Ministries, statistical authorities, etc.), which subscribers receive in line with their individual profiles. Due dates are programmed if the local regulation provides for compliance reports to be submitted on fixed dates. The system automatically sends CN Alerts by email 15 days and 5 days before the respective reporting / compliance obligation is due. Subscribers of the Post-Market-Entry Compliance service receive alert messages for countries where their subscription is active. This service mitigates regulatory risks created by multiple reporting schemes and helps to avoid fines for non-compliance.
- *CN Change Archive:* is a database of relevant changes that have taken place in a particular jurisdiction (for both gas and power commodities). The CN Change Archive can be consulted on our website, and all relevant changes are also sent as CN Alerts via email, in order to make sure that subscribers are always fully aware of the recent developments or changes for the countries within the scope of their subscription. The CN Change Archive covers all jurisdictions covered by CN. Any questions about the contents of the change archive can be addressed via our CN Regulatory Hotline service.

CN Monthly Regulatory Reports:

• **The CN Digest:** offers subscribers a qualified monthly monitoring service in the form of a regulatory report. The Digest has been in circulation since 2008 under the name "Correggio Regulatory Report" and is issued 11 times per year. All issues are available on our archive platform and as an email newsletter. The Correggio archive allows analysis of particular issues and historic research on regulatory topics.



• **SoS Reports**: are specific monthly reports addressing gas regulation in general, gas storage in particular, change to gas-related tariffs, or any specific legislation addressing security of supply, or specific reporting duties relating to physical gas trade in Europe. The SoS Reports are issued monthly, 11 times per year.

CN staff and CN data base are located in Europe. CN follows a decentralised model with CN staff working in multiple countries. The vendor company CorreggioNET DMCC is domiciled in Dubai, UAE. Subscribing contracts are concluded with CorreggioNET DMCC.

2. Which jurisdictions does CorreggioNET cover?

The Post-Market Entry Compliance service covers gas and electricity trading in the following 32 jurisdictions:



The geographical coverage is continuously widened in line with the needs of our subscribers.



3. What is the cost of accessing CorreggioNET?

We offer various membership packages to our subscribers, which have been designed to provide maximum flexibility and cost-effectiveness:

- Premium Membership: allows access to everything included in our platform in relation to gas and electricity trading in all 32 jurisdictions. Premium membership also includes free access to our monthly regulatory report CN Digest but not the SoS Reports. In addition, the new countries introduced to the CorreggioNET platform are automatically added to the premium membership subscription, without extra charges.
- *Large Membership:* allows access to everything included in our platform in relation to gas and electricity trading in 20 jurisdictions of your choice. Large membership also includes free access to our monthly regulatory report CN Digest but not the SoS Reports.
- *Advanced Membership:* allows access to everything included in our platform in relation to gas and electricity trading in 10 standard jurisdictions of your choice.
- *Basic Membership*: allows access to everything included in our platform in relation to gas and electricity trading in 5 standard jurisdictions of your choice.
- *Custom Membership:* is an "à la carte" option, which allows you to pick and choose any particular product and geographical coverage corresponding to your business activities. Pricing information is available in our price list.

All membership options include complementary access to the CN Regulatory Hotline and CN Alert Service, as well as the CN Change Archive. The CN Digest and SoS Report monthly regulatory update are also available as a bolt on option to the Advanced, Basic and Custom memberships. For the Premium and Large membership, the CN Digest monthly regulatory update is included.



Table A: CN Membership Categories

Jurisdictions	Post-Market Entry Guide gas and power (in Euro)	CN Digest Service (in Euro)
Premium (32 countries)	70,000	Inclusive
Large (20 countries)	59,000	Inclusive
Advanced (10 countries)	35,000	5,000
Basic (5 countries)	20,000	5,000
First Year of Subscription for Package Subscription	10% rebate	

4. Can you change the geographical scope during the year?

Pre-Market Entry Reports: you may order additional standard Pre-Market Entry Reports for additional jurisdictions at any time, on a per need basis. CN will issue a separate invoice for any additional report that has been purchased.

Post-Market Entry Guides: membership fees are payable in advance for each of the different membership types for a period of one year. Subscribers may add products at any time during the subscription period. The fees for additional Post-Market Entry products will be invoiced pro-rata for the initial subscription.

Subscribers are not allowed to reduce the product scope during the subscription period and CN is unable to refund any fees paid. A request for a reduction in the geographical scope will be reflected in the subsequent subscription period.

5. What is the minimum subscription period?

Unless otherwise stated in the End-User License Agreement (EULA), the standard term of the provision of each Service is one calendar year from the Start Date (1 January) for



the Service and will automatically renew for additional one year periods, unless one party gives the other not less than thirty (30) days prior notice to expire at the end of the thencurrent term for that Service (the "Term") Subscription fees must be paid in advance and are not refundable. Subscribers will be contacted near the end of their subscription period to remind about the new service period (for the next calendar year).

Should the subscription start in the course of the year, a pro-rata subscription will be offered for the remaining months of the initial year. As of the subsequent year, the standard yearly subscription applies.

Should a subscriber terminate the services within the subscription period, no refund shall be provided, unless our service has been unavailable for more than 30 days.

6. What are the contractual arrangements?

The contractual arrangements for the CN services are provided in an End-User License Agreement (EULA) and our <u>General Terms and Conditions (GTCs)</u>, which are available on our <u>website</u>. We are unable to negotiate these terms or make individual arrangements, as we would like to maintain consistent and non-discriminatory access to the platform for all subscribers.

CN may modify the service from time to time in view of regulatory developments. We will use reasonable efforts to notify you of any significant change to the services, in due time. Any changes of the GTCs or the EULA will take effect only as of the new subscription term. During the subscription period, the EULA and GTCs will remain unchanged.

7. How do you access CorreggioNET?

Access to the platform is granted upon executing the End-User License Agreement (EULA) and paying the applicable annual subscription fee, or the pro-rata fee.

We offer on-boarding assistance to all subscribers. When you sign up you will be asked to identify which employees will be your authorised users requiring access to the platform.

8. How many users does a single subscription allow?

There is no limit on the number of authorised users you may identify. The CN subscription model is thus per company, and not per user (the price indicated is for company subscription, for an unlimited number of user accounts). Each user will receive an individual username and password.

External advisors to subscribers (such as retained counsel or tax adviser) are not entitled to access the platform unless they subscribe directly themselves. Should a subscriber be



part of a group, and various affiliates of the group need access to the platform, this access is granted without additional charge.

9. Does CorreggioNET offer a trial period?

We are pleased to offer a free trial for potential subscribers interested in the CN service. The free trial allows interested parties to access the trial environment of the system, helping them assess whether the CN service adds value to their compliance management. Trial accounts are not designed to deliver updated information, but rather to get familiar with all the system features and content structure. The standard trial duration is one month.

10. Does CorreggioNET offer legal or tax advice?

CN offers monitoring services and guidance to comply with national regulatory reporting obligations, but we do not offer legal or tax advice. Compliance management remains the responsibility of the subscribing company. The implementation of national reporting duties remains the task of each subscriber.

11. Can CorreggioNET information be shared with others?

Access to CN services is restricted to subscribers. Our services cannot be shared with external advisers, nor may external advisers access the CN services, unless they have subscribed to CN services themselves. The CN services and work-products are protected by copyright.

12. Does CorreggioNET offer a reporting delegation service?

CN services offer monitoring of reporting and other compliance obligations for wholesale energy traders, combined with the pro-active CN Alert Service, which sends automatic email alerts in advance of the due date of the respective reporting obligations. We are unable to submit reports on your behalf or to undertake delegation of any compliance tasks. At all times, subscribers remain responsible for any submissions made to comply with reporting requirements. CorreggioNET cannot accept any data from subscribers. In some countries, third parties are not allowed to report on behalf of others.



13.Is CorreggioNET liable for the content featured in its services? Is the content reliable?

CN warrants that all information on regulation is complete and up to date at the date of issuance of each report or update. Each Pre-Market Entry Report shows an issuance date. Subscribers shall acknowledge that regulation may be subject to changes after the date of issue. Updates of Post-Market Entry Guides are processed at regular intervals, but not in real-time. This time lag between updates results in information being potentially outdated for the period between regular updates.

The CN Digest service aims to pick up regulatory changes in monthly intervals, allowing for continuous monitoring of regulatory developments in-between updates. Therefore, we recommend that subscribers should also subscribe to the monthly CN Digest.

14. How often are Pre-Market Entry Reports and Post-Market Entry Guides updated?

Pre-Market Entry Reports are created or updated when a firm order for a report is placed, to make sure that the information provided is always up to date to the latest market developments. Post-Market Entry Guides are updated in line with regulatory changes and fully reviewed in regular intervals.

Pre-Market-Entry Reports are standalone PDF documents. As they are not continuously updated after delivery, subscribers can instruct updates at their convenience.

15. Who updates the CorreggioNET content?

CN has access to a Europe-wide network of trusted experts in energy law and regulation. We also work with a network of specialised counsels providing regular updates regarding regulatory developments in specific countries. All of our contractors and counsels have a proven track record in the energy industry, notably in the wholesale markets.

All information obtained is analysed and verified by CN prior to its publication on the platform to improve the reliability of the content. The information is complete and can be relied upon by subscribers at the time of publication.

16. What is the CorreggioNET Alert Service?

The CN Alert Service provides email alerts to subscribers regarding existing obligations within their subscription category 15 calendar days prior to the statutory deadline; a second email alert is sent 5 calendar days before the statutory deadline. Sending out alerts twice minimises the risk of overseeing any regulatory reporting duties and avoids penalties for non-compliance.



New reporting duties created or abolished in any of the countries covered are automatically implemented into the alter service.

17. What is the CorreggioNET Regulatory Hotline?

Subscribers may send regulatory questions relating to the content of the platform to a regulatory specialist, who will respond to these questions within 2 working days either by email or by telephone. For legislative and regulatory questions falling with the ambit of the CN content (energy market regulations), there is no additional charge for CN Regulatory Hotline service. Questions not falling within the ambit of the CN regulatory content may be addressed separately, subject to a pre-agreed fee and time period for providing an answer.

18. What is the CorreggioNET Digest Service?

Subscribers can opt to receive regulatory updates monthly through our CN Digest 'Regulatory Report,' which is available on our platform and sent as an email newsletter. Additionally, CN Digest Service subscribers gain access to the CN Regulatory Change Archive, which tracks regulatory developments in the jurisdictions covered by CorreggioNET.

19. What is the CorreggioNET SoS Report?

Subscribers can receive regulatory updates on security of supply and gas market news through our SoS Gas Briefing Note. This PDF report is sent as an email newsletter. Additionally, subscribers have the option to schedule a one-hour call with our gas market experts to discuss the potential impacts of gas market changes on their operations.

20. Does CorreggioNET offer individual consultancy services?

Within the standard service offer, we assist subscribers within the scope of the CN services. CN does not offer any individual consulting services outside the standard service scope. Project-related tailormade consulting services are available through Correggio Consulting (contact: info@correggio-consulting.eu)