

## **Questions & Answers**

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#### **1.** What is CorreggioNET?

CorreggioNET (CN) is a new platform designed from the bottom up to assist energy market participants to understand and comply with regulatory obligations applicable to energy trading across key jurisdictions in Europe.

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 onestop-shop for regulatory information across multiple jurisdictions. The CN platform brings innovation to this technical area and achieves vast economies of scale across the energy market by replacing the individual services traditionally provided to market participants oneto-one by different law firms and energy consultants.

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

We make available on our platform a suite of comprehensive Pre-Market Entry Reports (PMERs), which advise on the relevant regulatory requirements to enter each market. For example, our reports cover general hubs and market platforms information, gas and electricity transportation rules and relevant tariffs.

Currently, the Pre-Market Entry Compliance service consists of over 40 standard reports, covering both gas and power in over 20 countries, reports which are updated twice per year. Each report is available to order on a per-request basis and any questions about the contents of the reports can be addressed via our CN Regulatory Hotline service.

#### 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 three key additional elements to support your business:

<u>CN Regulatory Hotline:</u> is an invaluable 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 48 hours.



<u>CN Alert:</u> is an automatic alert tool with due dates for compliance obligations, 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. Subscribers of the Post-Market-Entry Compliance service receive alert messages for countries for which a subscription has been activated. This service mitigates regulatory risks created by multiple reporting schemes and helps to avoid fines for non-compliance; and

<u>CN Digest (Correggio Regulatory Report)</u>: 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 platform. The digest is intended to bridge any potential gaps between the biannually updated Pre-Market Entry Reports and the Post-Market Entry Guides by offering continuous monitoring between updates.

### 2. Which jurisdictions does CorreggioNET cover?

The Post-Market Entry Compliance service covers gas and electricity trading in the following 28 jurisdictions:

Austria, Belgium, Bulgaria, Croatia, Czech Republic, Denmark, Estonia, France, Germany, Greece Hungary, Italy, Latvia, Lithuania, Moldova, the Netherlands, North Macedonia, Poland, Portugal, Serbia, Romania, Slovakia, Slovenia, Spain, Switzerland, Turkey, the UK and Ukraine.

We plan to widen the geographical coverage in line with the needs of our subscribers.



#### 3. How much does access to CorreggioNET cost?

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 28 standard jurisdictions. Premium membership also includes free access to our monthly regulatory report (CN Digest).

**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. The CN Digest monthly regulatory update is also available as a bolt on option to the Advanced, Basic and Custom memberships. For the Premium membership, the CN Digest monthly regulatory update is included.

Jurisdictions	Pre-Market Entry Report gas <b>or</b> power (in Euro)	Post-Market Entry Guide gas <b>and</b> power (in Euro)	CN Digest Service (in Euro)
Premium (28 countries)	45,000	45,000	inclusive
Advanced (10 countries)	25,000	25,000	5,000
Basic (5 countries)	14,000	14,000	5,000
Rebates from Package Price		Midsize and Small Subscribers Up to 50%	
First Year of Subscription for Package Subscription		Up to 20%	



# 4. Are changes of the geographical scope possible within the yearly subscription period?

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?

The minimum subscription period for our membership options is one year. It can be renewed on an annual basis. Subscription fees must be paid in advance and are not refundable. We do not operate an automatic renewal of the service. Instead subscribers will be contacted near the end of their subscription period. Subscribers can either renew their subscription, or terminate the service without further obligations.

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 General Terms and Conditions (GTCs), which are available on our <u>website</u>.

We are unable to negotiate these terms or offer any 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. 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 after you execute the End-User License Agreement (EULA), which is available on our website, and after you pay the relevant annual subscription 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. There is no limit on the number of authorised users you may identify. Each user will receive an individual username and password.

#### 8. For how many users does a single subscription allow?

The subscription is granted on a company basis without a limit on the number of staff members allowed to access the platform. 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 should 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 test the system and to assess whether the CN service adds value to their compliance management.

### **10.** Does CorreggioNET offer legal or tax advice?

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

#### **11.** Can CorreggioNET information be shared with others?

Access to CN services is restricted to subscribers and their authorised (trial) users. 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.** Do you 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. 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. Why is this service not offered by an industry association?

Generally, industry associations are non-profit organisations and are unable to render consulting services as they may give rise to liabilities. For this reason, this type of service can only be offered by a professional consultancy firm such as Correggio Consulting Limited.

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

The engine behind the CN platform, Correggio Consulting Limited, has operated since 2005 under a general liability insurance scheme covering all of its consulting services. We have never had any professional liability cases brought against us. CN warrants that all information on regulation is complete and up-to-date at the date of issuance of each report. Each report shows an issuance date. Subscribers shall acknowledge that regulation may be subject to changes after the date of issue. Updates are processed at regular intervals, but not in real-time. This results in information being potentially outdated for the period between updates.

However, 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.

## **15.** How often are Pre-Market Entry Reports and Post-Market Entry Guides updated?

CN will publish bi-annual updates, for some jurisdictions with high regulatory volatility we will update more frequently.



#### 16. Who updates the CorreggioNET content? Can I rely on the 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 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.

### **17.** Does CorreggioNET offer individual consultancy services?

Within the standard service offer, we assist subscribers within the scope of the CN services. Any tailor-made consulting beyond this scope is subject to a separate consulting agreement.

#### **18.** 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 calendars days before the statutory deadline.

#### **19.** 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.

### 20. What is the CorreggioNET Digest Service?

Subscribers may choose to receive regulatory updates on a monthly basis through our Regulatory Report available on our platform. In addition, CN Digest Service subscribers receive – in conjunction with the Report – access to a regulatory archive (consisting in a collection of the articles contained in the usual reports, more fit for an on-purpose research), tracking regulatory developments dating back to 2012.