

REQUIREMENTS ON OWNERS AND REPRESENT-ATIVES OF HOLDING ACCOUNTS

These requirements are based on the Commission Delegated Regulation (EU) 2019/1122 (hereinafter referred to as "the Registry Regulation").

The requirements pertaining to each application are available below in this document, in the sections indicated by the table below. Only the sections that are mentioned below apply to each application.

ТҮРЕ	APPLICATION	REQUIREMENTS PERTAINING TO THE REQUEST
	Opening an operator holding account	→ Sections A, B, C and F
	Opening a holding account for an air- craft operator	→ Sections A, B, C and F
Opening a hold- ing account	Opening a holding account for a maritime operator	→ Sections A, B, C and H
	Opening a trading account	→ Sections A, B, C and D
	Opening a person holding account in the national KP registry	→ Sections A, B, C and G
Registering a ver- ifier	Registering a verifier	→ Sections A, B, C and E
Changing account	Adding an authorised representative	→ Sections A, B and C
representatives	Removing an authorised representative	→ Sections A and B
	Claiming an operator holding account	→ Sections A, B, C and F
Claiming an ac-	Claiming a holding account for an air- craft operator	→ Sections A, B, C and F
count	Claiming a holding account for a maritime operator	→ Sections A, B, C and H
	Claiming a trading account	→ Sections A, B, C and D
Closing an ac- count	Closing any type of account, removing a verifier from the registry	→ Sections A and B

TABLE OF CONTENTS

Α.	REQUIREMENTS PERTAINING TO APPLICATIONS	3
В.	GENERAL REQUIREMENTS ON DOCUMENTS TO BE SUBMITTED	4
C.	REQUIREMENTS PERTAINING TO AUTHORISED REPRESENTATIVES	6
D.	REQUIREMENTS PERTAINING TO HOLDERS OF TRADING ACCOUNTS	8
E.	REQUIREMENT PERTAINING TO REGISTERING A VERIFIER	. 11
	OPENING AN OPERATOR HOLDING ACCOUNT OR AN AIRCRAFT OPERATOR HOLDING	. 11
G.	OPENING A PERSON HOLDING ACCOUNT IN THE NATIONAL KP REGISTRY	. 12
Н	OPENING A MARITIME OPERATOR HOLDING ACCOUNT	14

A. REQUIREMENTS PERTAINING TO APPLICATIONS

REQUIREMENT	COMPLIANCE WITH THE REQUIREMENT
Application	The application is submitted in the REKA online system. Alternatively, if necessary, an application form may be filled. In the REKA system, all applications shall be signed by persons authorised to represent the applicant in accordance with the articles of association or other similar rules. On behalf of a company, the documents shall be signed by persons with authorisation to represent the company. Private persons sign the application in person. The application form is signed as in the REKA system, with the exception that an application concerning removal of an authorised representative can also be signed by an authorised representative assigned for the account.
Verifying the right of the persons signing on behalf of the account holder to sign the company name	The Energy Authority will verify the information from information services of Alma Talent and the joint business information system of the Finnish Patent and Registration Office and the Tax Administration (hereinafter referred to as "the Information Service").
	In the case of municipalities and other institutions under public law, the Energy Authority will verify the information from the account holder's website. If the Energy Authority uses information found on the website of the account holder for the verification, the Energy Authority will also send e-mail to the account holder to double-check the information.
	A company registered abroad must submit evidence of the right to sign the company name.
	If necessary, the Energy Authority may request a written report on the right to sign the company name.

B.GENERAL REQUIREMENTS ON DOCUMENTS TO BE SUBMITTED

REQUIREMENT	COMPLIANCE WITH THE REQUIREMENT
Some documents must be original or certified, and in certain cases legalised.	Certain documents must be submitted to the Energy Agency as originals or as certified copies. Some documents must also be legalised. It is mentioned in the following chapters to which documents the requirements apply.
	For further information, see the <u>Energy Authority website</u> .
Documents must be submitted in Finnish, Swedish or	All of the submitted documents must be either in Finnish, Swedish or English.
English.	In the case of documents in any other language, an official translation by the authority or an authorised translator, preferably into Finnish or Swedish, must be enclosed. If there is a justified reason to do so, the Energy Authority may also accept a translation into English. For more information on authorised translators, please visit https://www.oph.fi/en .
	The original legalised document or a legalised copy thereof must be submitted with the official translation if the document concerns an organisation. If the document concerns a natural personal, a certified copy of the original document is sufficient.
	If a public document is granted in any of the official EU languages and it concerns a natural person, an official translation is not needed if the document is accompanied by a multilingual standard form provided by an EU Member State. A multilingual standard form can be used to certify e.g. a person's name, domicile and/or residence, nationality and absence of a criminal record.
Delivery method of documents	By regular mail or in person to: Energy Authority Lintulahdenkuja 2 A FI-00530 Helsinki, Finland If the documents are to be delivered in person, • it must be done on Tuesdays and Thursdays between 8 am and 4:15 pm to the Energy Agency's lobby services, which delivers the documents to the Energy Agency's registry
	or

REQUIREMENT	COMPLIANCE WITH THE REQUIREMENT
	 an appointment for the delivery must be made in advance by sending an e-mail to rekisteri@ener-giavirasto.fi or calling +358 (0)29 5050 100 on weekdays between 12:00 and 2:00 pm Finnish time.
	By virtue of the Commission Regulation, the Energy Authority is obligated to demand delivery of the documents enclosed as appendices to an application on paper, which is why the documents cannot be sent by e-mail or fax.
	If the application is submitted using an application form, the signed form may be scanned and sent by e-mail to the Energy Authority (rekisteri@energiavirasto.fi). Also, the form which indicates the beneficial owners (see below) of an organisation requesting the opening of an account may be scanned and sent by e-mail.
Age of the documents	The certification and legalisation of a document must take place less than three (3) months prior to the moment when the request for action is submitted.
	The personal identification document (an identity card or passport) whose copy is submitted to the Energy Authority must be valid when the copy is submitted.

C.REQUIREMENTS PERTAINING TO AUTHORISED REPRESENTATIVES

Depending on the type of representation, an authorised representative has a right to initiate transactions and/or approve actions and processes relating to the holding account, e.g., transfers and removals of authorised representatives, on behalf of the account holder. Accounts may also have authorised representatives with a right to view an account. At the opening, each account shall have at least two authorised representatives. Each account shall have at least one authorised representative with the right to initiate processes and one with right to approve processes. Verifiers shall have at least one authorised representative. A representative of a verifier may not be representative of any account. More information about rights of authorised representatives can be found on the Energy Authority's webpage https://energiavirasto.fi/en/emissions-trading-registry Instructions and Forms Authorisation for representatives.

Evidence of the identity and	The Energy Auth
majority of a proposed	of a proposed re

COMPLIANCE WITH THE REQUIREMENT

The Energy Authority will verify the identity and majority of a proposed representative from the Finnish Population Register. As a general rule, the account holder does not need to submit any separate documents.

If the information cannot be found in the Finnish Population Register, the Energy Authority will send a separate request to the account holder on submitting a certified copy of one of the following:

- a personal identification document granted by a member state of the European Economic Area or the Organisation for Economic Cooperation and Development (OECD); or
- a passport.

Citizens of non-EU member states must always submit one of the above-mentioned documents, properly certified and legalised, to prove their identity and majority.

Evidence of permanent residential **address** of a proposed authorised representative

REQUIREMENT

authorised representative

At least one of the authorised representatives of a trading account or person holding account in the KP registry must live in

The Energy Authority will verify the residence of a proposed authorised representative from the Finnish Population Register. Generally, the account holder need not submit any separate documents.

However, if the information cannot be found in the Finnish Population Register, the Energy Authority will send a separate request to the account holder to submit a certified and, if documents are granted outside the EU member states, also a legalised copy of one of the following:

REQUIREMENT

COMPLIANCE WITH THE REQUIREMENT

Finland. No requirements on residence are applied to authorised representatives of operator holding accounts, aircraft operator holding accounts, maritime operator holding accounts and verifier accounts.

- As above, a personal identification document if it shows the proposed representative's permanent address;
- Any other form of personal identification granted by an authority that shows the proposed representative's permanent address; or
- If the proposed representative's permanent country of residence does not grant personal identification documents that show the person's permanent address, a certificate from a local authority on the permanent residence of the proposed representative.

Criminal record data of a proposed authorised representative

Persons living in Finland:

The Energy Authority may refuse to accept an authorised representative if the proposed authorised representative is being investigated or has been convicted in the past five years of fraud pertaining to emissions allowances, money laundering, funding of terrorism or any other serious crime in which the account could be used.

The Energy Authority will request the information from the Finnish Legal Register Centre. The account holder need not submit any documents to the Energy Authority.

Persons living outside of Finland:

No requirements on criminal record data are applied to authorised representatives of verifier

The account holder must submit the criminal record data of the person living outside of Finland from the person's country of residence as an original document or as a certified copy. Documents granted outside the EU member states must be legalised. The Energy Authority will also request information on all persons named as authorised representatives from the Finnish Legal Register Centre.

Personal **URID** number in the Union Registry

accounts.

In order to appoint a person as a representative for an account, they must have a personal URID number in the Union Registry, for example FI123456789012.

In order to get the URID, one must register at the Union Registry. See further instructions in the new user quide on the Energy Authority's webpage. Users that have already registered can check their URID by logging in to the Union Registry. The URID is shown on the top lefthand corner.

Minimum number of authorised representatives for an account

For a verifier, the mandatory minimum number of representatives is one (1) authorised representative per verifier.

For all accounts, the mandatory minimum number is two (2) authorised representatives per account.

D. REQUIREMENTS PERTAINING TO HOLDERS OF TRADING ACCOUNTS

Trading accounts are opened in the Union Registry. This is a voluntary account type.

If the party opening an account is an organisation:

REQUIREMENT

COMPLIANCE WITH THE REQUIREMENT

Evidence on the organisation requesting the opening of an account having an open **bank** account in an EEA member state

The organisation requesting the opening of an account must submit a signed statement from the bank regarding an open bank account. The statement must include the following: the bank's name, the bank account holder's name, the date and a signature of a representative of the bank. The statement must in principle be submitted as an original document.

Evidence of the **registration** of the organisation requesting the opening of an account and a list of its **managers** as defined in Article 3(1) point (25) of Regulation (EU) 596/2014. If necessary, also the instrument establishing the organisation.

The Energy Authority will verify this information from the Information Service. As a general rule, the organisation requesting the opening of an account need not submit any separate documentation.

An account may only be opened for an organisation registered in Finland.

If the information cannot be found in the Information Service, the Energy Authority will send a separate request on submitting relevant documents to the organisation requesting the opening of an account. The documents must be originals or certified copies.

Criminal record data of the management of the organisation requesting the opening of an account, as stated above

Persons living in Finland:

The Energy Authority may refuse to open an account if one of the people included in the management of the potential account holder is being investigated or has been convicted in the past five years of fraud pertaining to emissions allowances, money laundering, funding of terrorism or any other serious crime in which the account could be used.

The Energy Authority will request the information directly from the Finnish Legal Register Centre. The organisation requesting the opening of an account need not submit any documents to the Energy Authority.

Persons living outside of Finland:

The organisation requesting the opening of an account must submit the criminal record data of the person living outside of Finland from the person's country of residence as an original document or as a certified copy. If the criminal record is requested outside the EU member states, the document must be legalised. The Energy Authority will also always request information about the whole management of the organisation from the Finnish Legal Register Centre.

REQUIREMENT	COMPLIANCE WITH THE REQUIREMENT
Information about the beneficial owner of the organisation requesting the opening of an account, including the name, date of birth, nationality, type of ownership or authority, as defined by the Act on Detecting and Preventing Money Laundering and Terrorist Financing (444/2017).	The Energy Authority will verify this information from the Information Service. As a general rule, the organisation requesting the opening of an account need not submit any separate documentation. If the information cannot be found in the Information Service, the Energy Authority will send a separate request to the organisation requesting the opening of an account on submitting a report on a separate form on the beneficial owners of the organisation.
A certificate from an authority on the organisation requesting the opening of an account being included in the register of parties liable to pay value added tax	The Energy Authority will verify this information from the Information Service.
If necessary, financial statements of the organisation requesting the opening of an account	The Energy Authority will verify this information from the Information Service. As a general rule, the organisation requesting the opening of an account need not submit any separate documentation.
	If the information cannot be found in the Information Service, the Energy Authority will send a separate request on submitting relevant documents to the organisation requesting the opening of an account. The documents must be originals or certified copies.
Evidence of the registered address of the organisation requesting the opening of an account	If the organisation's registered address is not stated in any of the documents listed above, the organisation requesting the opening of an account must upon request submit another document that includes the address to the Energy Authority. The document must be original or a certified copy.

If the party opening an account is a <u>private person</u>:

REQUIREMENT	COMPLIANCE WITH THE REQUIREMENT
Evidence on the private person	The private person requesting the opening of an account
requesting the opening of an	must submit a signed statement from the bank regarding
account having an open bank	an open bank account. The statement must include the
account in an EEA member	following: the bank's name, the bank account holder's
state	name, the date and a signature of a representative of the
	bank. The statement must be original or a certified copy.

REQUIREMENT	COMPLIANCE WITH THE REQUIREMENT
Evidence of the identity of the private person requesting the opening of an account	The Energy Authority will verify the identity of the proposed person from the Finnish Population Register. Generally, the private person requesting the opening of an account need not submit any separate documents. If the information cannot be found in the Finnish Population Register, the Energy Authority will send to the private person requesting the opening of an account a separate request on submitting a certified copy of one of the following: • a personal identification document granted by a member state of the European Economic Area or the Organisation for Economic Cooperation and
	Development (OECD); or • a passport.
	Citizens of non-EU member states must always submit one of the above-mentioned documents, properly certified and legalised, to prove their identity.
Evidence of the permanent residential address of the private person requesting the opening of an account	The Energy Authority will primarily verify the information from the Finnish Population Register. The private person requesting the opening of an account need not submit any separate documentation.
An account may only be opened for a private person who permanently lives in Finland. The person's citizenship is of no significance; only their permanent residence	However, if the information cannot be found in the Finnish Population Register, the Energy Authority will send to the private person requesting the opening of an account a separate request on submitting a certified and if documents are granted outside the EU member states also a legalised copy of one of the following:
is decisive.	 A personal identification document submitted in accordance with the paragraph above if it shows the person's permanent address; Any other form of personal identification granted by an authority that shows the person's permanent address; or If the person's permanent country of residence does not grant personal identification documents that show the person's permanent address, a
	certificate from a local authority on the permanent residence of the person.

REQUIREMENT

COMPLIANCE WITH THE REQUIREMENT

Criminal record data of the private person requesting the opening of an account

The Energy Authority may refuse to open an account if the potential account holder is being investigated or has been convicted in the past five years of fraud pertaining to emissions allowances, money laundering, funding of terrorism or any other serious crime in which the account could be used.

The Energy Authority will request the information directly from the Finnish Legal Register Centre. For a justified reason, the Energy Authority may request the criminal record data of the private person requesting the opening of an account from another country as an original document or as a certified copy. If the criminal record is requested outside the EU member states, then the document must be legalised.

E.REQUIREMENT PERTAINING TO REGISTERING A VERIFIER

REQUIREMENT

COMPLIANCE WITH THE REQUIREMENT

A document proving that the person requesting the opening of an account has been **accredited** as a verifier in accordance with Article 15 of Directive 2003/87/EC

The Energy Authority will verify this information directly from the authority that accredited the verifier. The verifier requesting the registration need not submit any documentation. If necessary, the Energy Authority will contact the verifier to request further information.

F.OPENING AN OPERATOR HOLDING ACCOUNT OR AN AIRCRAFT OPERATOR HOLDING ACCOUNT

A document clearly identifying the **structure of the group** if the account holder is part of a group. The Energy Authority will verify this information from the Information Service. If the information cannot be found in the Information Service, the Energy Authority will send a separate request on submitting relevant documents to the organisation requesting the opening of an account. The documents must

	be originals or certified copies. Documents issued outside of the Nordic countries must also be legalised.
If necessary, information about the beneficial owner of the organisation requesting the opening of an account, including the name, date of birth, natinality, and type of ownership or authority, as defined by the Act on Detecting and Preventing Money Laundering and Terrorist Financing (444/2017).	The Energy Authority will verify this information from the Information Service. If the information cannot be found in the Information Service, the Energy Authority will send a separate request on submitting relevant documents to the organisation requesting the opening of an account.

G. OPENING A PERSON HOLDING ACCOUNT IN THE NATIONAL KP REGISTRY

A person holding account in the KP Registry (KP account) is opened in the Kyoto Protocol National Registry. The account type is voluntary. EU emission allowances cannot be held in a KP account, only KP units can be held there (CER, ERU, AAU, RMU). A KP account is needed for example if the party requesting the opening of an account participates in a CDM project and receives CER units directly from the CDM registry. A KP account can only be opened for legal persons.

REQUIREMENT	COMPLIANCE WITH THE REQUIREMENT
Evidence on the organisation requesting the opening of an account having an open bank account in an EEA member state	The organisation requesting the opening of an account must submit a signed statement from the bank regarding an open bank account. The statement must include the following: the bank's name, the bank account holder's name, the date and a signature of a representative of the bank. The statement must in principle be submitted as an original document.
Instruments establishing the organisation requesting the opening of an account and evidence of the registration of	The Energy Authority will verify this information from the Information Service. As a general rule, the organisation requesting the opening of an account need not submit any separate documentation.
the organisation and its management (persons effectively directing the day-to-day operations of a legal person)	If the information cannot be found in the Information Service, the Energy Authority will send a separate request on submitting relevant documents to the organisation requesting the opening of an account. The documents must
An account may only be opened for an organisation registered in Finland.	be originals or certified copies.

REQUIREMENT

COMPLIANCE WITH THE REQUIREMENT

Criminal record data of the management of the organisation requesting the opening of an account, as stated above

The Energy Authority may refuse to open an account if one of the people included in the management of the organisation requesting the opening of an account is being investigated or has been convicted in the past five years of fraud pertaining to emissions allowances or Kyoto units, money laundering, funding of terrorism or any other serious crime in which the account could be used.

Persons living in Finland:

The Energy Authority will request the information directly from the Finnish Legal Register Centre. The organisation requesting the opening of an account need not submit any documents to the Energy Authority.

Persons living outside of Finland:

The organisation requesting the opening of an account must submit the criminal record data of the person living outside of Finland from the person's country of residence as an original document or as a certified copy. If the criminal record is requested outside the EU member states, the document must be legalised. The Energy Authority will also always request information about the management of the organisation from the Finnish Legal Register Centre.

Information about the **beneficial owner** of the organisation requesting the opening of an account, including the type of ownership or authority, as defined by the Act on Detecting and Preventing Money Laundering and Terrorist Financing (444/2017).

The Energy Authority will verify this information from the Information Service. As a general rule, the organisation requesting the opening of an account need not submit any separate documentation.

If the information cannot be found in the Information Service, the Energy Authority will send a separate request to the organisation requesting the opening of an account on submitting a report on a separate form on the beneficial owners of the organisation.

A certificate from an authority on the organisation requesting the opening of an account being included in the register of parties liable to pay **value** added tax

The Energy Authority will verify this information from the Information Service.

Financial statements of the organisation requesting the opening of an account

The Energy Authority will verify this information from the Information Service. As a general rule, the organisation requesting the opening of an account need not submit any separate documentation.

If the information cannot be found in the Information Service, the Energy Authority will send a separate request on

REQUIREMENT	COMPLIANCE WITH THE REQUIREMENT
	submitting relevant documents to the organisation requesting the opening of an account. The documents must be originals or certified copies.
address of the organisation requesting the opening of an account	If the organisation's registered address is not stated in any of the documents listed above, the organisation requesting the opening of an account must upon request submit another document that includes the address to the Energy Authority. The document must be original or a certified copy.
An authorisation in accordance with the Act on the Use of the Kyoto Mechanisms (109/2007) for holding Kyoto units in an account and transfers in international emissions trading	This requirement only applies to a party that is not an operator referred to in the Emissions Trading Act. A separate authorisation is not needed if the applicant has a valid authorisation to participate in a Joint Implementation project or a Clean Development Mechanism. The Energy Authority verifies on its own initiative the existence of an authorisation primarily from the authorities granting them. An authorisation can only be granted to a legal person, and, therefore, a KP account cannot be opened for a private person.

H. OPENING A MARITIME OPERATOR HOLDING ACCOUNT

1. Requirements concerning all shipping companies as account holders:

REQUIREMENT	COMPLIANCE WITH THE REQUIREMENT
A document clearly identifying the structure of the group if the account holder is part of a group	The Energy Authority will verify the information from the Information Service. If the information cannot be found in the Information Service, the Energy Authority will send a separate request to the organisation requesting the opening of the account to submit the relevant documents. The documents must be originals or certified copies of the originals, and the documents issued outside the Nordic countries must also be legalised.
If necessary, the name, date of birth, nationality, and type of ownership or authority of the	The Energy Authority will verify the information from the Information Service.

beneficial owner of the organisation requesting the opening of the account as defined in the Act on Preventing Money Laundering and Terrorist Financing (444/2017).

If the information cannot be found in the Information Service, the Energy Authority will send a separate request to the organisation requesting the opening of the account to submit the relevant documents.

In addition to the general requirements, special requirements also apply to a shipping company depending on whether the account holder is the ship owner or an ISM company.

- If the ship owner will be the account holder, see section 2A below for the required documents.
- If an ISM company will be the account holder, see section 2B below for the required documents.

2A. Requirements when the ship's owner will be the shipping company and the account holder:

REQUIREMENT	COMPLIANCE WITH THE REQUIREMENT
A document listing the ships under the responsibility of the ship owner and the IMO identification numbers of the ships in question	
If there are changes to the list of the ships under the responsibility of the ship's owner, the ship's owner must within 20 working days • notify the Energy Authority of the matter • submit an updated list of the ships • submit the IMO unique company and registered owner identification number of the ship's new owner for each ship with a new owner	

2B. Requirements when an ISM company will be the shipping company and the account holder:

A document clearly stating that the ship's owner **has authorised** the ISM company to manage all emissions trading obligations.

'ISM company' is defined in the first subparagraph of Article 1 of the Commission Implementing Regulation (EU) 2023/2599.

- The document must be signed by the ship owner and the ISM company
- If the document is in a language other than English, it must be translated into English
- The document must be an original or a certified copy of the original
- If the document is a copy of the original that has been certified outside Finland, it must also be legalised
- The document must be certified or legalised within three months before the date on which the application for opening the account is submitted.
- The document must contain the following information:
 - Name of the ISM company authorised by the ship's owner and the IMO unique company and registered owner identification number
 - The state in which the ISM company is registered, in accordance with the IMO system applying to the companies and the registered owners
 - Name of the ship owner and the IMO unique company and registered owner identification number
 - Contact person of the ship owner
 - o First name
 - Last name
 - o Title
 - Workplace address
 - Work phone number
 - Work email address
 - Date from which the ISM company's authorisation is valid

The Energy Authority reserves the right to request the information listed below for opening a maritime operator holding account. These documents are submitted only if the Energy Agency explicitly asks for them.

The instrument **establishing the organisation** requesting the opening of the account and proof of the registration of the organisation

The Energy Authority will verify the information from the Information Service. As a rule, the organisation requesting the opening of the account does not need to submit separate documents.

If the information cannot be found in the Information Service, the Energy Authority will send a separate request to the organisation requesting the opening of the account to submit the relevant documents. The documents must be originals or certified copies of the originals.

Proof that the organisation requesting the opening of the account has an open **bank account**

The organisation requesting the opening of the account must submit a statement on the open bank account signed by the bank. The statement must contain the following information: name of the bank, name of the bank account holder, date, and the signature of the bank's representative. As a rule, the statement must be submitted as an original.

An official certificate of the entry of the organisation requesting the opening of the account in **the VAT register**

The Energy Authority will verify the information from the Information Service.

The annual report of the organisation requesting the opening of the account or its latest audited financial statements or, if the latest audited financial statements are not available, a copy of the financial statements stamped by the tax office or the financial manager

The Energy Authority will verify the information from the Information Service. As a rule, the organisation requesting the opening of the account does not need to submit separate documents.

If the information cannot be found in the Information Service, the Energy Authority will send a separate request to the organisation requesting the opening of the account to submit the relevant documents. The documents must be originals or certified copies of the originals.