

KYC questionnaire for energy market

In order to ensure efficient cooperation, KELER CCP Central Counterparty Ltd. (hereinafter: KELER CCP) need to know and understand its existing and future clients and their activities. On this basis, the Risk Know Your Customer Questionnaire (hereinafter: Questionnaire) is introduced.

In line with the General Business Rules and the applicable Announcements of KELER CCP, filling out the Questionnaire forms part of the mandatory annual reporting obligation, and in the case of new clients it is one of the entry terms. The Questionnaire requests information related to your company that KELER CCP needs in order to have as comprehensive information as possible for risk management purposes.

KELER CCP Ltd. reserves the right to change the content of this Questionnaire in full or in part, any time, without any restrictions, subject to the applicable legal requirements.

Please note that some of the questions in the Questionnaire require documents to be attached / sent. Please make sure that the attachment is in Hungarian or English. If documents in other languages are attached, additional questions may be asked in order to obtain information.

By completing the Questionnaire we acknowledge and accept the above terms and conditions and comply with them, we declare that provided data, information are complete and correct.

Date:

Signature:

I. Company information

1. Please provide the following information about the company you represent (Company):

Company name:

Short Company name

Place of registration:

Time of registration:

Registered office:

Country:

ZIP code:

City:

Street name:

Street number:

TAX number (EU, or local TAX number):

- EU Tax number:
- If the company does not have EU Tax number, please state the local Tax number:

LEI code:

- LEI code:
- The Company does not have a LEI code.

HELP: LEGAL ENTITY IDENTIFIER. IF THE COMPANY DOES NOT HAVE A LEI CODE, PLEASE LEAVE THE FIELD BLANK!

EIC code:

- EIC code:
- The Company does not have a EIC code.

HELP: ENERGY IDENTIFICATION CODE. IF THE COMPANY DOES NOT HAVE A EIC CODE, PLEASE LEAVE THE FIELD BLANK!

2. Does the Company have a website?

- Yes / If yes, please provide the link to the website of the Company.

Website link:

- No

3. Is the Company licensed by any energy regulatory authority to trade energy products?

- No
- Yes / Please state the name and website name of the licensing energy regulatory authority in the table below.

Energy regulatory / authority name	Energy regulatory / authority website name

4. Please declare if the Company was fined by the competent energy market supervisory authorities in the past 3 years (related to operational and trading activities).

- No
- Yes / In the following table, please state the name of the authority that levied the fine, the amount and currency of the fine and the reason for the imposed fine.

Name of authority imposing the fine	Amount and currency of fine imposed	Reason for fine imposed

5. Do any of the following apply to the Company?

- Yes
- Listed company.
 - Company with more than 50% direct or indirect state ownership.
 - Subject to the legal framework for the prevention of money laundering (or 100% owned subsidiary of a company that is subject to money laundering prevention rules).
- No

6. Please name the direct owners of the Company with more than 10% holding in the Company. If you leave the table blank, we consider that you have declared that there is no owner with a share of more than 10% in the Company.

Name	Ownership (%)

7. Do the owners of the Company have shares in other companies in excess of 20%?

- No
- Yes / Please name these companies.

8. Please attach a document which fully presenting the Company's entire ownership structure and the shareholding percentages(direct or indirect holdings, share of ownership).

HELP: PLEASE ATTACH THE OWNERSHIP STRUCTURE FILE TO THE EMAIL, IN WHICH YOU SEND THE COMPLETED KYC QUESTIONNAIRE BACK TO KELER CCP (KSFREPORTING@KELERKSF.HU). THE FORMAT OF THE ATTACHED DOCUMENT CAN BE: DOC, DOCX, PDF, XLS, XLSX, JPEG, BMP.

9. Please list the press releases about the Company published in the last 12 months that you consider significant. If available on the Internet, please state the hyperlink to the article.

Media name	Hyperlink

10. Please state the number of employees of the Company.

11. Please attach the organizational chart of the Company.

HELP: PLEASE ATTACH THE ORGANIZATIONAL CHART FILE TO THE EMAIL, IN WHICH YOU SEND THE COMPLETED KYC QUESTIONNAIRE BACK TO KELER CCP (KSFREPORTING@KELERKSF.HU). THE FORMAT OF THE ATTACHED DOCUMENT CAN BE: DOC, DOCX, PDF, XLS, XLSX, JPEG, BMP.

12. Has the Company been part of a merger or division or has the ownership of the Company changed during the last business year?

Yes / Please detail the changes:

No

13. Is the main activity of the Company directly linked to energy or commodity trading?

- Yes
- No

14. Please describe (i) what the Company wish to achieve with the role of clearing membership, and (ii) the strategy of the Company for the next 3 to 5 years *.

** KELER CCP Ltd. treats the provided information confidentially in accordance with the legal provisions on business secrets and securities secrets.*

15. Is the Company a financial institution subject to [575 / 2013 EU regulation](#) (commonly known as CRR)?

- Yes
- No

16. Please list the countries where the Company currently provides services.

17. Does the Company have

- any offices, transactions, investments, activities or planned activities in Russia / Belarus / Donetsk, Luhansk regions / Crimea / Cuba / Iran / North Korea / Sudan / Syria / Venezuela,

or

- any dealings with any individual or entity located, resident, or organized in Russia / Belarus / Donetsk, Luhansk regions / Crimea / Cuba / Iran / North Korea / Sudan / Syria / Venezuela, or with any entity directly or indirectly owned or controlled by any entity located, resident, or organized in Russia / Belarus / Donetsk, Luhansk regions / Crimea / Cuba / Iran / North Korea / Sudan / Syria / Venezuela, in each case, including with Intermediaries acting on behalf of or engaging in related Dealings with Russian / Belarusian / Donetsk, Luhansk regions / Crimean / Cuban / Iranian / North Korean / Sudanese / Syrian / Venezuelan entities

or

- banking relationship with Russian-based or Belorussian-based banks?

- No
- Yes

If the answer for the previous question is YES please specify these (i) transactions, investments, activities or (ii) planned transactions, investments, activities (iii) dealings (iv) the percentage of these to the Company's total revenue and / or assets, and (v) name the banks, (vi) the services provided by the banks to the Company, (vii) how the provided services affect the financial capability, liquidity and trading activity of the Company.

18. List the Company's top 5 business partners. If the Company is not currently trading, please indicate.

19. If the Company has a (non-)clearing membership with a central counterparty (CCP) other than the non-clearing membership with KELER CCP, please fill in the table below as follows:

ESMA recommends that the National Competent Authorities ensure that supervised CCPs consider in their participation requirements and as part of the initial and ongoing assessment of the credit worthiness of their (non-)clearing members, the amount of losses that their members could be exposed to, due to their participation in multiple CCPs taking into account the potential losses of mutualised pre-funded and non-pre-funded resources, on the basis of data that need to be provided by (non-)clearing members.” ([Link to the report](#) - page 60.)

Based on the (non-)clearing members' feedback KELER CCP will evaluate the exposures in line with ESMA recommendation.

- No, the Company does not have a (non-)clearing membership relationship with another CCP.
- Yes, the Company has a (non-)clearing membership relationship with another CCP.

If the Company has a clearing membership other than the (non-)clearing membership with KELER CCP, then please fill in the below table.

The total exposure of the (non-)clearing member towards CCPs on 31th December of the latest closed business year (including exposures to KELER CCP arising from gas market clearing membership).

Please state the currency (EUR, USD etc.)

Pre-funded resources (e.g.contribution to default fund)	Non-pre-funded resources (pl.: assessment powers committed)
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II. Financials

1. Please attach the most recent audited annual report of the Company that was signed by the auditor. If available electronically, please state a hyperlink that directs to the annual report.

If the Company was founded in the latest 6 months, then please attach the company except.

PLEASE ATTACH THE AUDITED FINANCIAL STATEMENT TO THE EMAIL, IN WHICH YOU SEND THE COMPLETED KYC QUESTIONNAIRE BACK TO KELER CCP (KSZFREPORTING@KELERKSZF.HU). THE FORMAT OF THE UPLOADED DOCUMENT CAN BE: DOC, DOCX, PDF, XLS, XLSX, JPEG, BMP.

Hyperlink to the annual report:

HELP: BY ATTACHING THE AUDITED ANNUAL REPORT WITH APPROPRIATE CONTENT OR STATING THE HYPERLINK TO THE PUBLIC AND OFFICIAL WEBSITE YOU MEET THE APPLICABLE REPORTING OBLIGATION. FOR MORE DETAILS ON THE REPORTING OBLIGATION, PLEASE REFER TO POINTS 9.5. OF THE GENERAL BUSINESS RULES OF KELER CCP LTD. IF YOU COMPLETE THE QUESTIONNAIRE AS PART OF ENTERING KELER CCP LTD., THE DATA OF THE ANNUAL REPORT ATTACHED HERE WILL BE USED TO CHECK SHAREHOLDERS' EQUITY, FOR MORE DETAILS PLEASE REFER TO POINTS 9.4.

2. Please state the following details related to the annual report of the Company:

Balance sheet date:

How much time does the Company have to prepare and / or disclose your financial statement (calculated from the balance sheet date) in the country where your company is seated?

In case the Company has more than 9 months (calculated from the balance sheet date to prepare your financials) please indicate the proper regulation which justifies it.

Please mark and fill in the one below that is appropriate for the Company:

- There is an audited report available.:
 - Annual report was audited by:

 - The annual report was prepared in line with the following reporting standards:
 - National
 - International / Please state the name of the international reporting standards (e.g. IFRS, US GAAP):
- There is no audited report available.

III. Operating capacities

III/1. Ensuring and availability of liquidity

1. Please describe the Company's liquidity management framework, including how the Company ensures the availability of necessary liquidity to maintain normal continuous day-to-day trading activity. In addition, which tools is the Company able to use to ensure the establishment of the necessary liquidity demand in a market stress situation (e.g. significant change in margin requirements, intraday margin call, increased guarantee fund contribution)?

2. Is the parent company / owner(s) of the Company able to financially support the Company in case of liquidity issues?

- Yes
- No
- N/A, justification:

3. I declare that the Company is always capable of ensuring the required liquidity by its available tools and resources to be able to maintain its future/planned and current trading activities.

- Yes
- No

III/2. Ability to interface with financial systems

1. I undertake that the Company will establish and continuously maintain the net banking access to its bank accounts held at commercial banking and settlement banking partners, thus I undertake that the Company is technically capable of providing the required collaterals within the appropriate deadline on the so-called settlement account held at settlement banks.

- Yes
 No

2. I undertake that the Company will establish and continuously has a backup solution which technically enables the Company to provide the required collateral on the settlement account with the settlement banks within the appropriate deadline.

- Yes

Presentation of a backup solution:

- No

3. I declare that the Company can fulfill its obligations towards KELER CCP directly to KELER CCP in case of any obstacles arising in connection with the settlement account (GBR 4.10.6.).

- Yes
 No

4. I declare that the Company can deal with operational obstacles due to different working days and/or national (bank) holidays.

- Yes
 No

III/3. Availability of appropriate IT systems related to clearing membership

1. I declare that the Company has the primary software and applications used for electronic communication (e-mail) with KELER CCP, these tools are always ensured and the Company can receive the emails sent by KELER CCP.

Yes

No

2. I declare that the Company has a backup solution that is technically able to ensure the electronic communication with KELER CCP and able to receive e-mails sent by the KELER CCP.

Yes

Presentation of a backup solution:

No

III/4. Required expertise, experience, risk management within the company

1. Please name the traders of the Company:

Name	Full time / part time	Other companies, where the trader was employed in the past 5 years.	Trading experience (year)

2. If at least 2 traders have not been named, filling in the following statement is mandatory.

Given the lack of minimally sufficient resources (2 people due to substitutability), I declare that the Company has backup solutions that ensure the smoothness and continuity of the trading process.

Yes

Presentation of a backup solution:

No

3. Please describe the Company's trading decision process, including internal approval procedure.

4. Please briefly explain how does the Company determine the amount of the planned energy trading?

5. Please describe the partner risk management tools of the Company.

6. Please describe the solutions of the Company which are dedicated to ensure the trading activity. If the solutions are performed by the parent company / outsourced, please indicate.

	Please describe in some sentences.	The solution is provided by the parent company/ outsourced by a third party	If the solution is provided by the parent company/ third party, please explain how you manage the related risks, how you supervise the function?
IT systems / resources (e.g. name of software and purpose of use, outsourced activity)			
Backup solutions (e.g.. cloud solutions)			
Dedicated trading department (if any, and what work schedule they work on (e.g. 7 / 24))			
Backoffice department (if any, and what work schedule they work on (e.g. 7 / 24))			

7. I declare, the Company has a framework for the management of operational risks and a BCP plan or other solutions ensuring business continuity, the continuous operation of clearing, and also the trading and operational processes preceding clearing.

- Yes
 No

8. Please describe how the company manages operational risks?

III/5. Attributes of trading

1. Has the Company registered on regulated trading platforms other than those settled by/through KELER CCP?

- No
- Yes / Please state the name of the platform:

2. Is the Company involved in OTC trades?

- No
- Yes / Please state the estimated share of OTC trades in total trading turnover (in %):

3. In addition to proprietary trading, does the Company also trade on behalf of clients?

- No
- Yes / Please state the estimated share of agency trading in total trading turnover (in %):

4. Is the Company actively engaged in any of the following activities?

- Yes / If yes, with which ones?
 - Energy production / commodity extraction.
 - System operation, distribution (TSO, DSO).
 - Supply to end-users (retail or wholesale).
 - Energy trading.
 - Other, please explain:
- No

