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International Mercantile  
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President of CJSC SPIMEX  
(signed) A.E. Rybnikov

Seal:  
Closed Joint Stock Company Saint-Petersburg  
International Mercantile Exchange  
\* S-Petersburg \*  
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Procedure for Organization of Electronic Interaction Using Software and Hardware Complex in  
Connection with the Organized Trading at CJSC SPIMEX

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### 1. TERMS AND DEFINITIONS

1.2. For the purposes of this Procedure for Organization of Electronic Interaction Using Software

and Hardware Complex in Connection with the Organized Trading at CJSC SPIMEX (hereinafter referred to as the “Procedure”), the following terms and definitions are used:

- **Automated Working Station (AWS)** shall mean a set of software and hardware tools used by a Trading Member for technical access to SHC (software and hardware complex) of the Exchange.
- **CJSC SPIMEX (the Exchange)** shall mean Closed Joint Stock Company Saint-Petersburg International Mercantile Exchange.
- **Application** shall mean an electronic document containing mandatory particulars established by the Rules of Organized Trading.
- **External Software and Hardware Complex (hereinafter referred to as “ESHC”)** shall mean software and hardware tools determined by the Exchange which can be integrated by a Trading Member in coordination with the Exchange in the Exchange’s SHC through a universal software and hardware gateway.
- **Internal documents of the Exchange** shall mean the Rules of Organized Trading and other documents of the Exchange regulating relations associated with conducting of organized trading between the Exchange and the Clearing Organization, Delivery Controllers, Trading Members and other entities of the exchange infrastructure approved by authorized bodies of CJSC SPIMEX in accordance with their competence.
- **Identifier** shall mean Trader’s ID number, code of a representative of ETS (Electronic Trading System)’s User assigned at registration in the ETS in accordance with the Rules of Organized Trading and expressly associated with an Electronic Signature Verification Key Certificate registered in the ETS.
- **Clearing Organization** shall mean Closed Joint Stock Company “Settlement and Depository Company”, or RDK (ZAO).
- **Personal Account** shall mean electronic customer service system of the Exchange which can be accessed via a secure connection after passing the procedure of identification and authentication.
- **Simple Electronic Signature Key Password (Key Password)** shall mean AWS access password created in accordance with the Procedure for Obtaining Technical Access to the Electronic Trading System intended to conclude contracts in the Exchange sections and, along with ID, used when creating simple electronic signature.
- **Organized Trading Rules** shall mean a set of Internal Documents of the Exchange regulating the procedure of organized trading in the sections of CJSC SPIMEX and approved by the authorized bodies of the Exchange in accordance with the requirements of the statutory regulations of the Bank of Russia and other statutory regulations of the Russian Federation and the Charter of the Exchange, and duly registered by the Bank of Russia.
- **Rules of Electronic Document Management (hereinafter referred to as the “EDM Rules”)** shall mean the Rules of Electronic Document Management of Closed Joint Stock Company “Settlement Depository Company” approved by the authorized body of RDK (ZAO).

- **Software and Hardware Complex of the Exchange (hereinafter referred to as the “SHC”)** shall mean the software and hardware complex of the Exchange used for trading, information and other services provided to Trading Members.
- **Simple Electronic Signature** shall mean a detail of an electronic document allowing to clearly identify a representative of the Trading Member (Trader) who has submitted the electronic document to the ETS, and which is the Identifier assigned to each Trader.
- **Registration of the Certificate in ETS** shall mean registration of an owner of Electronic Signature Verification Key Certificate issued to a Member of EDMS (Electronic Document Management System) in accordance with the EDM Rules and establishment of an unambiguous correspondence between such a Certificate and an Identifier.
- **Electronic Trading System of Commodity Sections of the Exchange (hereinafter referred to as the “Commodity Sections ETS”)** shall mean a set of software and hardware tools, databases, telecommunication means and other equipment constituting a subsystem of the Exchange’s SHC and intended to conclude Contracts in the Commodity Sections of CJSC SPIMEX.
- **Enhanced Encrypted Non-Certified Electronic Signature** shall mean an Electronic Signature which verification key certificate is issued by a certification authority to an EDMS Member and meets the requirements of Federal Law No. 63-FZ “On Electronic Signatures” dated April 06, 2011.
- **Electronic Document** shall mean information in electronic form signed by Simple Electronic Signature and/or Enhanced Encrypted Non-Certified Electronic Signature.

1.2. The terms which are not specifically defined in clause 1.1. hereof shall have the meanings established by the laws and statutory regulations of the Bank of Russia and other statutory regulations of the Russian Federation, the Internal Documents of the Exchange and the Rules of EDM.

## 2. GENERAL PROVISIONS

2.1 This Procedure is developed on the basis of Federal Law No. 325-FZ “On Organized Trading” dated November 21, 2011, Federal Law No. 63-FZ “On Electronic Signatures” dated April 6, 2011 and Regulation No. 437-II of the Bank of Russia “On Organized Trading Activities” dated October 17, 2014.

2.2. This Procedure is an integral part of the Rules of Organized Trading and sets the following features of organization of electronic interaction between CJSC SPIMEX and Trading Members using ETS and Personal Account when conducting organized trading at the Exchange: the procedure for submitting by Trading Members of CJSC SPIMEX of electronic documents, including the use of Simple Electronic Signature in the course of electronic interaction between the Trading Members through ETS, the procedure for establishing the formats of transmitted electronic documents, the procedure for exchange of electronic documents and other information provided for in the laws of the Russian Federation and the Rules of Organized Trading of CJSC SPIMEX via Personal Account.

2.3. Electronic Documents created in accordance herewith are of equal legal force with hard copy documents signed by manual signature of an authorized employee and/or bearing the seal of a

Trading Member or CJSC SPIMEX.

2.4. Trading Members provide to CJSC SPIMEX, and CJSC SPIMEX provides to Trading Members information required by federal laws and the Rules of Organized Trading in the form of Electronic Documents via telecommunications channels, including via information and telecommunication network "Internet". In this case, Electronic Documents may be signed by:

- Simple Electronic Signature and Enhanced Encrypted Non-Certified Electronic Signature;
- Simple Electronic Signature;
- Enhanced Encrypted Non-Certified Electronic Signature.

Requirements to cryptographic information protection facilities (CIPF) used for sending/receipt of Electronic Documents signed by Enhanced Encrypted Non-Certified Electronic Signature are included in the text of this Procedure and the Rules of EDM published on the website of the Exchange in information and telecommunication network "Internet" (hereinafter referred to as the website of the Exchange).

2.5. Trading Members recognize logging facilities for sending and receipt of messages available in ETS to be sufficient to record the date and time of Electronic Document delivery.

2.6. Electronic Documents of the Exchange provided for herein shall be generated in accordance with the Electronic Document formats specified in the Technical Regulations approved by the President of CJSC SPIMEX and shall be published on the official website of the Exchange at least five (5) days before the date of their entry into force.

2.7. Implementing of electronic interaction may cause conflict situations associated with generation, delivery, receipt, acknowledgment of receipt of Electronic Documents and the use in these documents of Enhanced Encrypted Non-Certified Electronic Signature. The above mentioned conflict situations shall be resolved in the manner prescribed in the Rules of EDM.

2.8. This Procedure and amendments and additions hereto shall be approved by the Board of Directors and are subject to registration with the Bank of Russia in accordance with the requirements of the laws of the Russian Federation.

2.9. This Procedure and all amendments and additions hereto shall be disclosed by placing them on the official website of the Exchange on the Internet after their registration with the Bank of Russia within five business days from the date of receipt by the Exchange of a formal decision of the Bank of Russia (or its copy) about registration of the Procedure but in any case at least three business days before the date of its entry into force.

2.10. This Procedure and all amendments and additions introduced therein come into force after their registration with the Bank of Russia in accordance with the requirements of the laws of the Russian Federation on the date determined by the Board of Directors or, by order of the Board of Directors, by the sole executive body of the Exchange within five days after the date of information disclosure in accordance with clause 2.9 of this Section of the Procedure, unless another date of entry into force is determined by the Board of Directors or, by its order, by the sole executive body of the Exchange, subject to the requirements of the laws of the Russian Federation.

### **3. PROCEDURE OF ELECTRONIC DOCUMENTS SUBMISSION AND THE USE OF SIMPLE ELECTRONIC SIGNATURES IN THE COURSE OF ORGANIZED TRADING**

3.1. Trading Members shall exchange Electronic Documents in accordance with the Rules of EDM and in accordance herewith. Electronic Documents shall be sent to CJSC SPIMEX using information resources: ETS of commodity sections and ETS of the derivatives market section.

3.2. Trading Members file Applications to ETS of commodity sections and ETS of the derivatives market section. These Applications are Electronic Documents generated in accordance with the Rules of EDM and this Procedure containing an offer (or offers) to conclude one or more Contracts and recorded in the ETS in the manner in accordance with the Rules of Organized Trading. Each Application shall be signed by Enhanced Encrypted Non-Certified Electronic Signature or Simple Electronic Signature generated on the basis of Enhanced Encrypted Non-Certified Electronic Signature verification key certificate, save as provided in sub-clause 3.6.2 of clause 3.6 hereof. Upon delivery of Electronic Document using information and communication means or by direct entering in the ETS with an AWS, safety and integrity of an Electronic Document at the Exchange is protected by Enhanced Encrypted Non-Certified Electronic Signature.

Trading Members submit to the ETS of commodity sections and ETS of the derivatives market section Orders for withdrawal of Applications being Electronic Documents generated in accordance with the Rules of EDM and this Procedure. Each Application Withdrawal Order shall be signed by Enhanced Encrypted Non-Certified Electronic Signature or Simple Electronic Signature generated on the basis of Enhanced Encrypted Non-Certified Electronic Signature verification key certificate, save as provided in sub-clause 3.6.2 of clause 3.6 hereof. Upon delivery of an Electronic Document by information and communication means or by direct entering in the ETS with an AWS, safety and integrity of an Electronic Document at the Exchange is protected by Enhanced Encrypted Non-Certified Electronic Signature.

If it is required to make changes in the sent Application, Trading Members submit an Order for application withdrawal and an Application with updated details simultaneously to the ETS of commodity sections and the ETS of the derivatives market section.

3.3. HSC of the Exchange ensures security and integrity of Trading Members' Applications in the ETS resulting from taking a complex of organizational and technical measures, including, but not limited to:

- Using by Trading Member of an electronic signature which certificate is issued by the certification authority of RDK (ZAO);
- Use by Trading Member of an ID and Key Password for authentication and authorization check of the Trading Member receiving technical access to the ETS,
- Availability of a special procedure for transfer to the Trading Member of data about the assigned Identifier ensuring protection of this data from unauthorized access;
- Use of a special technology of registering Applications in the ETS eliminating any possibility of changing the terms of Applications after their registration in the ETS.

3.4. Simple Electronic Signature is generated using ETS based on a Simple Electronic Signature key. The Simple Electronic Signature Key is a combination of an ID and a Key Password. The Simple Electronic Signature Key must match the Electronic Signature Verification Key Certificate of an EDMS Member registered in the ETS and used when establishing a communication session with the Exchange and ensuring cryptographic protection of Electronic Documents transmitted using ETS. Simple Electronic Signature is used when implementing the interaction of Trading Members with the use of internal facilities of ETS and is an integral part of applications and other

documents in electronic form which are Electronic Documents and are submitted to ETS.

3.5. Electronic Document in the ETS of commodity sections of the Exchange are generated by the facilities of the ETS where an Electronic Document created using the facilities of ETS and containing Simple Electronic Signature is signed by Enhanced Encrypted Non-Certified Electronic Signature based on the secret part of the electronic signature verification key of EDMS Member matching a Certificate registered in ETS, is encrypted by cryptographic information protection facilities built into ETS and is transferred to ETS.

3.6. Electronic Document in the ETS of the derivatives market section of the Exchange is generated by the facilities of the ETS or by Internal Software and Hardware System (ISHC) where the generated Electronic Document containing Simple Electronic Signature is encrypted by cryptographic information protection facilities and is transferred to the core of the ETS. Electronic Documents are generated in the following ways:

3.6.1. In case of connecting a Trading Member to ETS via an AWS, Electronic Document containing Simple Electronic Signature shall be signed by Enhanced Encrypted Non-Certified Electronic Signature based on secret part of the key matching the Electronic Signature Verification Key Certificate of the EDMS Member registered in ETS and shall be encrypted by cryptographic information protection facilities embedded in the ETS (AWS).

3.6.2. In case of connecting of a Trading Member to ETS via ISHC, Electronic Document containing Simple Electronic Signature is generated by ISHC and is encrypted by cryptographic communication channels protection facilities.

3.7. When Electronic Document is received in ETS, it is automatically decrypted, Enhanced Encrypted Non-Certified Electronic Signature is verified which was used to sign the Electronic Document and Simple Electronic Signature is matched with the Electronic Signature Verification Key Certificate of the EDMS Member registered in ETS and used in the established communication session.

3.8. If the results of decryption of Electronic Document and verification of Simple Electronic Signature of an authorized representative of the Trading Member on the Electronic Document and checking the Electronic Document for compliance with the format established for it are positive, the Electronic Document is accepted for subsequent execution. In case of a negative verification result, the Electronic Document is not accepted by ETS for execution.

3.9. Contracts concluded in accordance with the Rules of Organized Trading on the basis of Applications filed in ETS in compliance with the requirements hereof shall be signed by Simple Electronic Signatures of the Parties which shall be properly reflected in the Contracts Register maintained by the Exchange and in the Extracts from the Contracts Register provided to the Trading Members in accordance with the procedure established by the Rules of Organized Trading.

#### **4. PROCEDURE OF ELECTRONIC DOCUMENT EXCHANGE VIA PERSONAL ACCOUNT**

4.1. In the course of information exchange the Exchange as a trade organizer places the following Electronic Documents signed by Enhanced Encrypted Non-Certified Electronic Signature in the Trading Members' Personal Account:

- Extract from the register of applications (for each commodity section);

- Extract from the contracts register (for each commodity section);
- Summary extract from the contracts register (for each commodity section);
- Extract from the list of recorded applications (for each commodity section);
- Bulletin summarizing trading results (for each commodity section);
- Bulletin summarizing trading results (derivatives market section),
- Extract from the contracts register (derivatives market section),
- Extract from the register of applications (derivatives market section),
- Extract from the list of recorded applications (derivatives market section),
- Daily report on the market maker's obligations (derivatives market section);
- Daily report on the performance of the market maker's obligations (derivatives market section),
- Monthly report on the performance of the market maker's obligations (derivatives market section),
- Report on determination of the parties under Supply Agreements in the "Oil Products" Section (derivatives market section),
- Other documents stipulated by the laws of the Russian Federation and the Rules of Organized Trading to be sent to the Trading Member.

Frequency, form and procedure of generation and submission of Electronic Documents are established by the rules of organized trading in the sections of CJSC SPIMEX.

4.2. Trading Member shall check in the Personal Account availability of Electronic Documents received from the Exchange at least once a day.

4.3. To determine the time of sending of an Electronic Document by the Exchange and their receipt by the Trading Member, the date and time of sending by the Exchange and receipt by the Trading Member of an Electronic Document is fixed and registered in the Personal Account.

4.4. Electronic Documents sent by a Trading Member to CJSC SPIMEX using Personal Account shall match the Electronic Documents formats contained in the Internal Documents of the Exchange approved by the President of CJSC SPIMEX and shall be placed on the official website of the Exchange at least three days prior to the date of their entry into force.