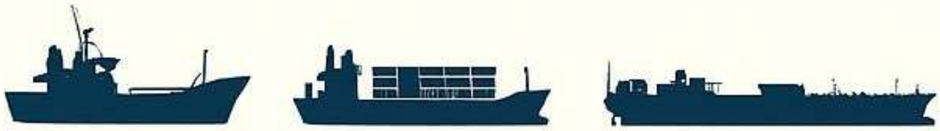
NEXUS
GREEN ENERGY

SERVICES FOR SELLING AND MANAGING CARBON CREDITS FOR VESSELS (EU ETS)



NEXUS
GREEN ENERGY

WE DELIVER RESULTS ON A GLOBAL SCALE

15 YEARS
in environmental commodity markets

OVER $3 BILLION
in tons of carbon credits traded.

1 BILLION
in tons of carbon credits traded

+6,000 CLIENTS
on five continents

5 CONTINENTS
covered by carbon offset projects

1 BILLION
in tons of carbon credits traded

+$2 BILLION
in global turnover

1 BILLION
in renewable energy projects over the next 5 years

+10 MILLION
transactions closed

Address: C/ Poeta Juan Maragall 47, Planate 11, Office 105, 28020 Madrid / Spain

Aither NEXUS GREEN ENERGY

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1. CONTEXT AND PURPOSE OF THE DOCUMENT

1.1 Introduction to the European climate regulatory change

Within the framework of the European Green Deal, the European Union has undertaken a legal and political commitment to achieve climate neutrality by 2050, reducing greenhouse gas (GHG) emissions by at least 55% by the year 2030 compared to 1990 levels. This commitment has been translated into legislation through the regulatory package known as “Fit for 55,” adopted between 2021 and 2023.

One of the central pillars of this package is the reform and expansion of the European Union Emissions Trading System (EU ETS), whose objective is to establish an economic cost for carbon to promote the progressive and verifiable reduction of emissions in regulated sectors.

As of 1 January 2024, the maritime transport sector is formally incorporated into the EU ETS through Regulation (EU) 2023/957, representing a structural change in the operational, financial, and environmental obligations of shipowners and operators of vessels over 5,000 gross tonnage (GT). This inclusion means that operators must monitor, report, and offset their CO_2 emissions (and subsequently CH_4 and N_2O) through the mandatory annual surrender of verified emission allowances (EUAs), in proportion to the emissions generated by each vessel.

This new regulatory framework places shipping companies before a dual responsibility: strict regulatory compliance and strategic adaptation to a decarbonized economic environment.

1.2 Purpose of this dossier

The purpose of this dossier is to present, clearly, rigorously, and action-oriented, the professional services offered by NEXUS GREEN ENERGY to facilitate for maritime companies the full, cost-effective, and transparent fulfillment of their obligations under the EU ETS.

This document aims to explain:

- The legal and operational structure of the new climate compliance regime applicable to ships;
- The financial and management impact of the obligation to surrender EUAs;
- The supply, advisory, and technical-legal support services that Nexus Green Energy provides to operators;
- The personalized collaboration proposal based on framework contracts, traceable solutions, and competitive prices.

This document also seeks to serve as a working tool for compliance, sustainability, operations, ESG, and financial-management teams, who must coordinate their organizations' response to this new legal-environmental framework.

1.3 Target audience

This dossier is expressly intended for:

- Shipowners and companies owning vessels over 5,000 GT;
- Shipping operators, regardless of contractual role (charterers, ship managers, ship operators);
- Shipping lines with intra-European routes or EU-non-EU connections;
- Maritime supply and port logistics companies;
- Legal advisers, compliance and ESG officers, fleet managers, and technical personnel involved in emission management.

Its content applies to multiple categories of vessels, including industrial fishing vessels, container ships, oil tankers, gas carriers, and bunker vessels, among others.

1.4 Role of Nexus Green Energy in the energy transition of maritime transport

NEXUS GREEN ENERGY positions itself as an independent strategic agent specialized in the sale, management, and traceability of regulated carbon credits (EUAs), with technical, financial, and legal capacity adapted to the specific context of maritime transport.

Through its structural alliance with Aither Group AG, Nexus offers:

- Direct and preferential access to primary and secondary EUA markets;
- Operational coverage throughout the EU and experience in more than 30 countries;

- **Advanced capabilities for modeling fleet emission needs, integration with MRV systems, and support for verification processes;**
- **Flexible framework contracts adapted to each type of vessel, route, and volume.**

The company acts as a compliance facilitator and cost optimizer, offering maritime operators an integrated solution that combines legal security, economic transparency, and continuous technical support.

2. THE NEW REGULATORY FRAMEWORK: ETS APPLIED TO THE MARITIME INDUSTRY

2.1 What is the Emissions Trading System (EU ETS)?

The European Union Emissions Trading System (EU ETS) is the main legal and economic instrument adopted by the EU to combat climate change through a system of **limitation and trading of greenhouse gas (GHG)** emissions. Established by **Directive 2003/87/EC**, its operational logic is as follows:

- **Each tonne of CO_2 equivalent emitted must be covered by one allowance (EUA).**
- **The total number of allowances is capped** by a maximum limit that decreases annually.
- Companies subject to the regime must surrender annually **enough allowances to cover their verified emissions**, under penalty of severe sanctions in case of non-compliance.

The EU ETS **operates as a market**, allowing the purchase and sale of emission allowances among operators, generating a carbon price that internalizes the environmental cost of polluting activity. Until 2023, this system applied mainly to industrial sectors, electricity generation, and aviation.

2.2 Evolution of the system and expansion to new sectors

Under the **"Fit for 55"** legislative package, adopted between 2021-2023, the European Union has thoroughly revised the EU ETS to align it with its **new 55% emission-reduction target for 2030** and the 2050 climate-neutrality goal.

A major structural novelty is its extension **to traditionally excluded sectors**, among them:

- Maritime transport (from 2024)
- Buildings and road transport (ETS II, from 2027)
- Distributed combustion processes
- Carbon removals (from 2026 in the voluntary ETS)

With the adoption of **Regulation (EU) 2023/957**, maritime transport is officially incorporated into the EU ETS as a regulated **sector with a direct obligation to surrender emission allowances.**

2.3 Inclusion of maritime transport through Regulation (EU) 2023/957

Regulation (EU) 2023/957 of 10 May 2023 amends **Directive 2003/87/EC to include the maritime** sector in the EU ETS. The regulation provides that:

- From 1 January 2024, operators **of vessels over 5,000 gross tonnage (GT) undertaking voyages** to or from **EU ports must monitor, report, and cover** their emissions through the surrender of EUAs.
- Emissions subject to the system include those produced during navigation, berthing, and port maneuvers, distinguishing intra-EU and extra-EU routes.
- Obligations are implemented through **the MRV (Monitoring, Reporting, and Verification)** system, which has been in place since 2018 under Regulation 2015/757.

The vessel operator—whether owner, charterer, or technical manager, as applicable—will be the **primary obligated entity** and must register its fleet and account in the **Union Registry** for allowance management.

2.4 Implementation phases and timeline

The inclusion of the maritime sector in the EU ETS follows a gradual structure, with a **regulated transition phase** to facilitate industry adaptation:

- **2024:** operators must cover **40% of their verified annual emissions with EUAs.**
- **2025:** the mandatory percentage increases to **70%.**
- **From 2026 onwards: 100% of covered** emissions must be offset.

This schedule allows operators to **adapt gradually** but requires financial and contractual planning from 2024 onward to avoid delays, penalties, and carbon-market exposure.

- CO_2 Emission Calculation Formula - Fuel Oil (Heavy Fuel Oil / HFO)

General formula for CO_2 emissions for liquid fuels under the EU ETS:
- ✓ **Emissions (t CO_2) = Consumption (t) × Emission factor (t CO_2/t)**

- Emission factor for Fuel Oil:

According to the European Environment Agency (EEA) methodology:
- ✓ **Standard factor for Heavy Fuel Oil (HFO) = 3.114 t CO_2 / t**

Example of annual calculation (per tonne of HFO consumed)

Year 2024 (40% obligation):
- ✓ **EUAs required = 1 × 3.114 × 0.40 = 1.2456 EUAs**

Year 2025 (70% obligation):
- ✓ **EUAs required = 1 × 3.114 × 0.70 = 2.1798 EUAs**

Year 2026 onwards (100% obligation):

- ✓ **EUAs required = 1 × 3.114 × 1 = 3.114 EUAs**

□ **Summary for 1 tonne of Fuel Oil:**

Year	EU ETS Obligation	EUAs per ton of HFO
2024	40 %	1.246 EUAs
2025	70 %	2.180 EUAs
2026+	100 %	3.114 EUAs

✅**Practical note:**

- If the vessel consumes **1,000 tons of Fuel Oil in 2025,** it shall acquire:
- ✓ **✓ 1,000 × 3.114 × 0.70 = 2,179.8 EUAs**

2.5 Types of emissions covered

The maritime EU ETS will apply, on a mandatory basis, to the following emissions:

- **CO_2:** gases resulting from the combustion of fossil fuels during navigation and at berth. **Mandatory from 2024.**
- **CH_4 (methane)** and **N_2O (nitrous oxides):** emissions associated with alternative fuels (LNG, dual-fuel engines, etc.). **They are incorporated into the obligation as from 2026.**

Emissions must be **quantified, reported, and verified annually** in accordance with the MRV plan approved for each vessel. The use of low-carbon alternative fuels does not exempt from the reporting obligation but may reduce the need for allowances.

2.6 Geographic scope of application

The maritime EU ETS has a defined territorial scope depending on the origin and destination of voyages:

- **Intra-EU routes:** all emissions (100 %) are subject to the surrender obligation.
- **Routes between the EU and third countries:** 50 % of emissions are covered.
- **Technical or commercial calls at EU ports:** all port-related emissions are included.

This geographic structure seeks to **prevent competitive distortions**, assigning proportional obligations and discouraging practices such as "port hopping" (changing ports to avoid regulation).

2.7 Application threshold: ships with gross tonnage > 5,000 GT

The Regulation limits application of the scheme to vessels whose **gross tonnage (GT)** exceeds **5,000 tons,** in line with the existing MRV system. This includes most of:

- Cargo ships (containerships, bulk carriers, tankers)
- Gas carriers, oil tankers, and bunkering vessels
- Large-tonnage industrial fishing vessels
- Passenger ships, ferries, and cruise liners
- Offshore support fleets

Vessels below this threshold are exempt at this stage but may be incorporated in future regulatory reviews.

2.8 Exclusions, exceptions, and special cases

The Regulation provides for certain exclusion or conditional-exemption scenarios, among them:

- **State vessels (**military, coast-guard or police): expressly excluded.
- **Auxiliary or service vessels** (tugs, dredgers, etc.): may be excluded depending on main activity.
- **Exceptional circumstances:** emergencies, compulsory diversions, force majeure.

It also recognizes specific **cases of difficult attribution of responsibility**, such as bareboat charter contracts, in which it must be determined case by case whether the obligated party is the registered owner, the effective operator, or the technical lessee. Therefore, it is essential to have **specialized legal and technical assistance** to correctly define the obligated entity and the objective limits of its responsibility under the MRV-ETS framework.

3. TYPOLOGY OF MARITIME VESSELS SUBJECT TO THE EU ETS

In accordance with **Regulation (EU) 2023/957,** all vessels with **gross tonnage exceeding 5,000 GT** that perform relevant voyages within the European Economic Area are subject to the EU ETS regime, with the obligation to **monitor, report, and cover** their greenhouse-gas emissions through the annual surrender of **EUAs (European Union Allowances).**
The main categories of vessels affected, and the regulatory and operational particularities of each, are detailed below.

3.1 Industrial fishing vessels

Industrial fishing vessels (trawlers, factory ships) whose capacity exceeds 5,000 GT are formally included in the regime if they:

- Unload or transit through **European Union ports;**
- Sail routes that include **EU exclusive economic zones.**

Although traditionally exempt from most climate mechanisms, their inclusion in the EU ETS responds to the high carbon footprint of **mechanized industrial fishing.**

Key considerations:

- Need to adapt MRV systems to extractive fishing activity.

- Control of emissions during transit and on-board processing operations.
- Coordination with national fisheries authorities (for fleets under EU flag).

3.2 Container ships

Container ships are one of the categories most affected by the EU ETS due to:

- Their high **installed power.**
- Their intensive use of intercontinental routes.
- Their constant participation in intra-European trade.

These vessels must cover 100 % of their emissions on intra-EU routes and 50 % on routes with third countries.

Specific obligations:

- High accuracy in MRV measurement systems (fuel, distance, payload).
- Clear contractual definition of the obligated party in **time-charter** operations.
- Coordination with multiple jurisdictions when intermediate ports exist (e.g., Africa, Asia).

3.3 Oil tankers

Oil tankers dedicated to the transport of liquid hydrocarbons (crude, fuel oil, diesel, etc.) have special implications because of:

- Their **high energy intensity per ton transported.**
- The need for **reputational compliance** within carbon-sensitive supply chains (refineries, large industrial clients).

Key aspects:

- Need to adapt technical documentation to sustainability audits (MRV + ESG).
- Double exposure to EU ETS and to **possible CBAM** mechanisms at receiving ports.
- Regular routes between terminals allowing advanced compliance optimization.

3.4 Gas carriers (LNG carriers, LPG ships)

Methane and gas carriers present relevant technical particularities due to their use of **dual-fuel (LNG + fuel)** engines and the emissions associated with **boil-off gas:**

- From 2026 they will be required not only to cover **CO_2** but also **CH_4 and N_2O**, representing an **additional quantification and verification challenge**.

Specific regulatory risks:

- Penalties for uncontrolled fugitive emissions.
- Need for advanced on-board measurement systems.
- Close coordination with accredited verifiers for multi-gas MRV validation.

3.5 Bunker vessels

Bunker vessels operate in port or coastal areas to supply fuel to other ships. Despite limited ocean navigation, their inclusion in the EU ETS is justified by:

- Their **regular operations in European ports.**
- Their emissions during maneuvering, transit, and cargo-pumping phases.

Operational obligations:

- Include in MRV fuel consumption during loading and transfer activities.
- Clearly define the obligated party if the vessel operates under **concession or logistics contract.**
- Identify port calls even if the vessel does not fly an EU flag.

3.6 Special cases

- **Mixed vessels (cargo/passenger, multipurpose)**
  Include ro-ro, ferries, and mixed transport ships. Their complexity lies in:
  - Proportional allocation of emissions by activity type.
  - Substantial variations in loads and routes.
  - Need to adapt MRV to discontinuous operations.

- **Leased or chartered vessels**

In **bareboat, time charter, or voyage charter** contracts, the obligation to comply falls on the **actual operator (ship operator),** which requires an express **contractual clause on the distribution of responsibilities** to avoid regulatory conflicts or duplication. Legal recommendation: include specific EU ETS compliance clauses in ship charter agreements from 2024 onwards, detailing monitoring obligations, data delivery, and EUA transfers.

- **Operator changes during the year**
  When a vessel changes operator or lessee during the compliance year:
  - Each operator is responsible **proportionally** to its management period.
  - Documentary coordination is required between outgoing and incoming parties.
  - EUA surrender may be joint or separate upon verifier validation.

This typological analysis enables shipowners and operators to identify their exposure level and **formal obligations** under the maritime EU ETS, facilitating the **legal**, **technical**, **and financial** planning necessary for compliance.

4. WHO WE ARE – NEXUS GREEN ENERGY

4.1 Corporate identity and purpose

Nexus Green Energy, S.L. is a European platform specialized in the **trading, management, and traceability of environmental assets,** focused on the regulatory and strategic compliance of companies subject to the new climate obligations imposed by European Union legislation.

With headquarters in Spain and an international scope, Nexus Green Energy was created with a clear purpose: **to facilitate the climate compliance of industrial, energy, and logistics**

operators, turning the regulatory challenge of decarbonization into an **opportunity for efficiency, reputation, and competitive advantage.**

We act as an independent intermediary in regulated and voluntary carbon markets, operating with transparency, legal rigor, and operational solvency to guarantee our clients secure and competitive access to:

- **Regulated carbon allowances (EUAs)**
- **Renewable energy certificates (GO, I-REC)**
- **Traceable and auditable ESG instruments**

4.2 Joint Venture between Nexus Energy Group and Aither Group AG

Nexus Green Energy is a **specialized subsidiary** born from the strategic alliance between two complementary entities:

- **Nexus Energy Group** (Spain): business holding with experience in energy markets, industrial sustainability, efficiency, and climate regulation.
- **Aither Group AG** (Switzerland): **one of the main European climate trading firms**, holding an active license as an emissions intermediary, operator in the Union Registry, and with global coverage in voluntary credits, ETS, and CBAM.

This **joint venture** combines technical, financial, and regulatory capabilities to **provide a holistic and customized** service to companies subject to the new European compliance frameworks, particularly in the maritime, energy, and industrial sectors.

4.3 International coverage and network of collaborators

Nexus Green Energy operates in more than **30 jurisdictions** through a consolidated network of:

- **Accredited verifiers** (ISO 14065 / EU ETS)
- **Brokers and financial intermediaries authorized** in the Union Registry
- **Law firms and specialized climate** consultancies
- **Engineering firms, MRV platforms, and project developers for offsetting**

This structure allows us to support each client with an integrated solution, from regulatory planning to the effective delivery of emission allowances, with the assurance of **cross-border legal and tax coverage.**

4.4 Technical, legal, and financial solidity

Nexus Green Energy guarantees its clients:

- **Direct operational capacity** in emission allowance markets (ETS)
- **Financial solvency** to formalize multiannual supply contracts with guaranteed delivery

- First-level legal advisory in environmental law, climate taxation, and European regulation
- **Technical expertise in emissions** modeling, MRV, verification systems, and ESG compliance

Our infrastructure combines **trading, consultancy, and operational legality**, positioning us as a **comprehensive climate compliance agent** – not only as a seller of allowances, but as a **long-term strategic partner.**

4.5 Our mission within the European Green Deal context

The **just energy transition** and the **polluter pays principle,** enshrined in the **European Green Deal,** redefine the role of companies in the fight against climate change. In this new scenario, it is no longer enough to "reduce": it is necessary to **measure, report, offset, and accredit.**

Our mission is clear: **to help companies meet their environmental obligations with legal certainty, economic efficiency, and real climate traceability.** In the case of the maritime sector, this involves supporting shipowners and operators in:

- The interpretation and implementation of the **maritime EU ETS**
- The legal acquisition of **carbon allowances (EUAs)**
- The contractual and financial structuring of compliance
- The integration of the carbon cost into route, fleet, and client decisions

Nexus Green Energy is not just a rights supplier: we are a **vehicle for strategic adaptation to the new European climate order.**

5. REGULATORY OBLIGATIONS FOR SHIP OPERATORS

As of 1 January 2024, ship operators subject to the **maritime EU ETS** are required to **monitor, report, and cover their greenhouse gas (GHG)** emissions generated on specific routes. These obligations are structured within a highly regulated legal framework combining **technical rules (MRV), accounting obligations (EUAs),** and independent **verification requirements**, all under the supervision of the European Commission and the competent authorities of Member States.

5.1 MRV System (Monitoring, Reporting and Verification)

The **MRV system (Monitoring, Reporting and Verification)** was established by Regulation (EU) 2015/757 and adapted by Delegated Regulation (EU) 2016/2071. It is the technical pillar of maritime climate compliance.

- **Registration in THETIS MRV**

Operators must register their vessels in the digital platform **THETIS-MRV**, managed by the European Maritime Safety Agency (EMSA), where all data regarding the vessel, operator, flag, tonnage, and affected routes must be recorded.

- **Approved monitoring plan**

Before the reporting year begins, each vessel must have an **individualized monitoring plan** approved by an **accredited verifier.** This document establishes:

  - Methodology for measuring fuel consumption
  - Calculation of direct emissions (CO_2)
  - Criteria for exclusion, uncertainty, and correction

- **Data collection by voyage or route**

Throughout the year, operators must collect precise technical data on:

  - Fuel consumption per leg
  - Emissions generated (CO_2, and from 2026 also CH_4 and N_2O)
  - Time in port, operating conditions, and cargo transported
  - Distance travelled

A **voyage-by-voyage or consolidated-route approach** may be adopted, provided it is justified in the MRV plan.

- **Annual verification by accredited entity**

At the end of the calendar year, the data collected must be **verified by an independent entity accredited under ISO 14065,** which issues a **Verification Report** accepted by the Commission. This report is an indispensable requirement for the valid delivery of EUAs.

5.2 Registration in the Union Registry for Emissions Trading

Every maritime operator subject to the EU ETS must hold an account in the **Union Registry**, **managed via the CITL / EU Login platform** and administered by the Member State considered "responsible" (generally, the flag or main establishment State).

This account allows the operator to:

- Receive, purchase, or transfer **EUAs (European Union Allowances)**
- Track declared verified emissions
- Perform the **formal delivery of allowances** before the deadline

The account-opening process may take between 4 and 8 weeks, so it must be planned in advance.

5.3 Mandatory delivery of EUAs before 30 September each year

Before **30 September of the year following the reported period**, the operator must:

- Have successfully completed the annual **verification process**
- Have its account registered in the **Union Registry**

- Proceed with the **delivery (surrender) of EUAs equivalent to 100% of its verified emissions**

For 2024 and 2025, the coverage percentage is progressive (40% and 70% respectively). From 2026 onwards, full coverage (100%) will be required.

5.4 Penalties for non-compliance

The European regulatory framework provides for **strict sanctions** in the event of non-compliance, in line with the “polluter pays” principle:

- **Financial penalty**
  - **€100 per tonne of CO_2 equivalent not covered** through EUAs**.**
  - This penalty does **not exempt** the operator from the obligation to surrender the pending allowances.

- **ESG reputation and legal risks**
  - Inclusion of the operator in **public lists of non-compliers** (naming and shaming).
  - Risk of exclusion from public tenders, subsidized routes, or contracts containing sustainability clauses.
  - Damage to ESG rating with financial entities or institutional investors.

5.5 Reputational, financial, and operational impact of compliance

The maritime EU ETS is not only a regulatory requirement but a **key element of corporate strategy**. Its impact unfolds in three dimensions:

- **Reputational:** climate compliance becomes a visible credential of corporate responsibility.
- **Financial:** the carbon cost must be internalized in the tariff and contractual structure (freight, demurrage, port costs).
- **Operational:** it compels the rethinking of routes, energy efficiency, combustion technology, and fuel selection.

5.6 Complementary obligations: client information, transparency

In addition to formal compliance obligations, operators must prepare to:

- **Accurately and traceably inform their clients** of their climate compliance.
- Incorporate the EU ETS cost into **charter and supply contracts.**
- Retain monitoring, verification, and **delivery records for at least 10 years**.
- Establish **internal audit, control, and responsibility procedures** that demonstrate compliance to third parties (ports, customs, investors, insurers).

6. NEXUS GREEN ENERGY SERVICES FOR MARITIME COMPLIANCE

Nexus Green Energy acts as an **integrated provider of climate compliance solutions** for maritime operators affected by the **EU ETS**, offering a unique combination of direct **access to carbon markets, regulatory technical advisory, and the design of integrated strategies for decarbonization and traceability.**

Our services are designed to accompany the client from **preliminary analysis to the effective delivery of emission allowances, with legal guarantees**, digital traceability, and financial efficiency.

6.1 Supply of emission allowances (EUAs)

Nexus Green Energy facilitates **secure, competitive, and flexible access for its clients to the European emission allowance market (EUAs),** both in the primary and secondary markets, including:

- **Direct sale from primary or secondary market**
  We have operational agreements with financial entities and authorized trading platforms, allowing us to supply:
  - **Primary-market EUAs,** acquired through official auctions or directly from holders.
  - **Secondary-market EUAs**, traded with industrial operators, financial entities, or carbon funds.

- **Short- and long-term contracts**
  We offer contractual modalities adapted to the client's operational and financial profile:
  - **Spot contracts:** immediate delivery at market price.
  - **Forward contracts:** fixed-price or indexed delivery for future periods.
  - **Multiannual coverage:** staggered packages up to 2030, adjustable by tonnage and route.

  - **Physical or represented deliveries**

Supply may be carried out through:

- **Physical delivery of EUAs to the operator's registered account in the Union Registry.**
- **Virtual delivery with legal representation:** for clients delegating their compliance to Nexus Green Energy under an authorized representation agreement.

- **Staggered coverage 2024-2030**
  We design **progressive coverage plans**, consistent with the regulatory calendar (40% in 2024, 70% in 2025, 100% in 2026), allowing optimization of compliance costs and anticipation of carbon price evolution (EU ETS Auction Price Benchmark).

6.2 Technical and regulatory advisory

Compliance under the EU ETS requires a combination of **technical precision and documentary security**. Nexus Green Energy provides a multidisciplinary team (engineers, verifiers, lawyers, emissions analysts) to support the client at every stage:

- **Estimation of annual emissions**

We model the annual EUA needs of each vessel or fleet based on:z

- Type of vessel, tonnage, and installed power
- Expected routes (intra-EU, extra-EU, port calls)
- Fuel used, average speed, cargo transported
- Historical reported emissions (when available)

- **Support in preparation and validation of the MRV plan**

We assist in:

- Drafting the **Monitoring Plan** for each vessel
- Optimizing measurement methodologies (direct, indirect, fuel-flow)
- Liaising with accredited verifiers
- Submission to the competent authority and THETIS-MRV

- **Support before auditors and verifiers**

We coordinate the annual verification process with authorized entities (ISO 14065) to ensure:

- Complete documentary validation
- Resolution of non-conformities
- Timely issuance of the **Verification Report** before 31 March of the following year

- **Integration of data with digital tools**

We offer solutions for:

- Digitalization of the MRV plan and emissions reports
- Integration with internal management systems (ERP, ESG, SCADA)
- Compliance alerts and automatic reminders (EUA delivery, audits)

6.3 Integrated compliance strategy

Beyond formal compliance, Nexus Green Energy designs climate strategies that **maximize the reputational and financial value of environmental compliance**, through integration with other regulatory and market instruments:

- **Linkage with CBAM (Carbon Border Adjustment Mechanism)**

We assist operators exporting or importing products subject to CBAM (steel, fertilizers, electricity, cement, hydrogen) in ensuring correct traceability of maritime emissions associated with the transport of such products, avoiding double counting and improving customs competitiveness.

- **Synergies with other environmental instruments**

We integrate EUA management with

- **Guarantees of Origin (GOs)** and I-REC certificates
- **Energy Savings Certificates (CAEs)** in national markets
- Voluntary carbon credits (VCUs) to offset uncovered emissions
- ESG mechanisms linked to sustainability ratings or green financing

- **Recommendations for reduction and residual offsetting**

We offer technical plans for:

- Implementation of energy efficiency in vessels (EEXI, CII)
- Transition to low-carbon fuels (biomethane, renewable LNG, green methanol)
- Strategic purchase of certified voluntary credits to neutralize the footprint not covered by the EU ETS

Nexus Green Energy not only guarantees legal compliance but turns the EU ETS into a strategic tool for **financial optimization, ESG differentiation, and access to climate-demanding clients.**

7. CONTRACT MODEL AND CONDITIONS

Nexus Green Energy provides its clients with a framework contract **model for the supply of emission allowances (EUAs)** designed according to the highest legal standards of European climate trading. This contract enables maritime operators to fulfill their obligations under the EU ETS with **legal certainty, operational traceability, and financial efficiency**, tailored to the specificities of their fleet, routes, and regulatory profile.

7.1 Flexible framework contract for EUA supply

The framework contract is a legal instrument that **regulates the ongoing relationship** between Nexus Green Energy and the ship operator for EUA supply, structured according to the following criteria:

- **Modularity:** adaptable to different vessel types, routes (intra-EU, extra-EU), fuels, and emission levels.
- **Scalability:** applicable to a single vessel or complex fleets with multiple flags or associated companies.
- **Multiannuality:** possibility of signing coverage for 1, 3, or up to 6 years (until 2030), with annual review and adjustment clauses.
- **Operational flexibility:** the contract allows for partial deliveries, quarterly distribution, or advance reservations based on the estimated annual emission volume.

7.2 Delivery modalities: spot, forward, staggered calendar

The contract may formalize different supply **modalities according** to the operator's budgetary and strategic needs:

- **SPOT:** immediate EUA delivery at market price, with payment within 5 or 10 business days. Ideal for short-term coverage or last-minute adjustments.
- **FORWARD:** commitment for future delivery (e.g., March or September of the following year) at fixed or indexed price. Provides financial predictability and protection against market volatility.
- **STAGGERED:** scheduled delivery (monthly, quarterly, or semi-annual) allowing distribution of compliance costs according to operational seasonality or client cash flow.

All modalities are **subject to contractual confirmation and full traceability** through the Union Registry.

7.3 Financial coverage, compliance insurance, and risk mitigation

The contract may include additional mechanisms to guarantee **secure execution of supply and protection of the operator** against market contingencies:

- **Price coverage:** call options, collars, or contracts indexed to the EU ETS Auction Price Benchmark.
- **Force majeure clauses (climatic or regulatory):** adapted to market interruptions or legislative changes.
- **Climate compliance insurance:** specific coverage against penalties due to delayed EUA delivery, in cases attributable to technical or third-party failures.
- **Bilateral financial guarantees:** sureties, escrow deposits, or bank guarantees for high-volume operations.

These instruments ensure that the **delivery of allowances is effective, verifiable, and free from operational or contractual risks.**

7.4 Confidentiality and contract governance clauses

The contractual model includes advanced provisions for:

- **Absolute confidentiality** regarding commercial terms, contracted volumes, and client technical data.
- **Protection of regulatory and sensitive data,** especially concerning emissions and ESG compliance.
- **Contract governance** through technical committees or early-resolution channels for incidents.
- **Jurisdiction, applicable law, and international arbitration,** if required, with the option to include clauses aligned with **ISDA/EFET** standards for international operators.

These clauses reinforce the legal security of the operation and allow its use as a base **document for due diligence, audits, or sustainable financing**.

7.5 Continuous legal support and traceability of operations

Beyond the individual sale, Nexus Green Energy accompanies the client with **continuous legal and documentary support**, including:

- Drafting and adaptation of clauses for charter, supply, lease, or financing contracts.
- Validation of the correct **attribution of the obligated entity** for leased or mixed vessels.
- **Comprehensive management of documentary compliance**: from EUA purchase to its traceability in the Union Registry, with delivery and custody certificates.
- Advisory for **audits, verifications, and regulatory reviews** under MRV and EU ETS Regulation.

Each EUA delivery operation is documented with a **digital compliance record issued** by Nexus, which can be integrated into the client's ESG system or presented to third parties.

8. COMPETITIVE ADVANTAGES OF NEXUS GREEN ENERGY

In an increasingly regulated, technical, and climate-reputation-sensitive market, working with a strategic partner possessing **operational capacity, genuine independence, and legal** guarantees becomes a decisive competitive advantage. Below are the structural strengths that position Nexus Green Energy as one of the leading **firms in climate compliance for the maritime sector** under the EU ETS.

8.1 Independent and neutral operator

Nexus Green Energy does not depend on energy traders, industrial groups, or vertically integrated investment funds. This **structural independence** guarantees:

- Objectivity in the selection and acquisition of EUAs
- Transparency in prices and operations
- Absence of conflicts of interest with other energy, fuel, or port-service providers
- Representation 100 % aligned with the interests of the shipowner or operator

We act as a **fiduciary agent and exclusive provider of climate compliance,** without interference from third parties.

8.2 Preferential access to liquid carbon markets

Through our alliance with **Aither Group AG**, Nexus Green Energy has direct access to:

- **Official EUA** auctions organized by EEX
- **Secondary OTC markets and EU-authorized platforms**
- Inventories of industrial emitters with verified surpluses
- Early-purchase opportunities under preferential conditions

This allows us to offer our clients **immediate liquidity**, uninterrupted coverage, and more competitive prices than the market average.

8.3 Pooled purchasing capacity for large fleets

Nexus coordinates purchase operations for:

- **Shipping groups with multiple companies or flags**
- **Fleets under common technical management (ship managers)**
- **Consortia, associations, or maritime alliances**

This smart **demand-aggregation capacity** enables us to:

- Negotiate better conditions with institutional counterparties
- Stabilize the carbon price for the entire fleet
- Optimize financial and fiscal planning of compliance

It also allows groups of SMEs or mixed fleets to access conditions typical of large-scale buyers.

8.4 Personalized assistance with multilingual support

We offer **personalized service and multilingual technical advisory**, with specialized teams in:

- Spanish
- English
- French
- Italian
- Portuguese
- Bulgarian and other Southeastern European languages

This allows us to accompany our clients throughout the entire compliance cycle, from contract signing to final EUA delivery, without linguistic or administrative barriers.

8.5 Climate-compliance digitalization tools

Nexus Green Energy provides its clients with a suite of digital tools for:

- Real-time visualization of compliance needs
- Control of key dates (MRV, verification, EUA delivery)
- Traceability of operations, deliveries, and certificates
- Integration with ESG, financial, and external-reporting platforms
- Automatic generation of reports for auditors, verifiers, and boards of directors

These tools enable our clients to anticipate risks, make informed decisions, and demonstrate their climate commitment objectively and measurably.

8.6 Reputation, multisector experience, and proven execution

Nexus Green Energy accumulates experience in:

- Regulated sectors such as energy, aviation, maritime transport, and heavy industry
- Certified voluntary projects for emissions offsetting (VCUs, GOs, CAEs)
- Regulatory compliance in more than 30 countries

Our team is composed of **engineers**, **lawyers**, **traders**, **and verifiers** with a proven record of:

- Fault-free execution in EUA delivery
- Successful advisory in MRV audits and regulatory reviews
- Audited operations under the highest European standards (ISO, ESMA, EEX)

8.7 Contractual transparency and competitive pricing

All our contracts include:

- **Clear clauses on volume, price, delivery, and contingencies**
- Detailed cost structure (EUA price, spread, services)
- No hidden penalties or exclusivity commitments
- Possibility of annual or regulatory-event review

Our pricing policy is based on the principle of **transparent cost + fair margin + full traceability,** making Nexus a **reliable, competitive, and legally solid supplier**.

9. COLLABORATION PROPOSAL – NEXT STEPS

Nexus Green Energy offers a **structured, traceable, and scalable collaboration proposal** adapted to the technical, financial, and regulatory reality of each maritime client. Our approach is not that of a mere carbon-credit supplier, but that of a **strategic partner for long-term compliance and climate efficiency.**

The phases of the onboarding process are described below:

9.1 Free preliminary evaluation (initial audit)

As a first step, we offer a **no-commitment evaluation** to analyze the client's exposure to the EU ETS. This initial audit includes:

- Identification of affected vessels (> 5,000 GT)
- Analysis of routes and approximate emissions
- Status of the MRV plan and current verification

- Regulatory risks and optimization opportunities

The result is delivered as a **confidential technical-climate report** useful for internal decision-making and budget forecasting.

9.2 Technical estimation of EUAs required per vessel and period

Once the collaboration is accepted, we **prepare a customized technical model** to:

- Calculate the volume of EUAs required for the current and following years
- Break down emissions by vessel, route type, installed power, and fuel consumption
- Evaluate the impact of the compliance schedule (40 % in 2024, 70 % in 2025, 100 % from 2026)
- Determine coverage scenarios and associated cost

This model serves as the basis for defining the volume to be contracted and for financial planning of the operation.

9.3 Design of compliance strategy (MRV + delivery + ESG)

Based on the estimation, Nexus designs an integrated compliance strategy covering:

- Adjustments or drafting of the **Monitoring Plan (MRV)**
- Assistance with opening or updating the **Union Registry** account
- Proposal of EUA delivery schedule (spot, forward, staggered)
- Integration of data into ESG, sustainability, green-finance, and reputation-communication reports

The strategy is delivered as an operational and **contractual roadmap aligned** with the client's financial and environmental objectives.

9.4 Formalization of the framework contract

Once the roadmap is approved, the following steps are taken:

- Signing of the **framework supply contract for emission allowances**, with clear clauses on volume, price, schedule, guarantees, and technical support
- Establishment of invoicing, traceability, and contract-governance mechanisms
- Activation of the Union Registry account and operational delivery channels

The contract is reviewed by our legal team and may be adapted to the client's language, jurisdiction, or structure.

9.5 Delivery of allowances for 2024 (before 30 September)

Pursuant to Regulation (EU) 2023/957, operators must **deliver the EUAs corresponding to 40 % of their 2024 emissions before 30 September 2025.**
Nexus commits to:

- Execute the delivery in a verified, registered, and documented manner
- Issue the **corresponding climate-compliance** certificate
- Ensure custody and traceability of the operation

The client may use this certificate for ESG reporting, contractual compliance, and external audit.

9.6 Continuous assistance until 2030 and staggered renewal

Nexus Green Energy offers a continuous and scalable **collaboration model including:**

- Automatic or scheduled annual contract renewal
- Review of the MRV plan according to route or fleet evolution
- Update of the emission-estimation model
- Progressive coverage of new regulated gases (CH_4 and N_2O from 2026)
- Advisory on **reduction, offsetting, and climate communication**

This ongoing support allows the client to **comply safely, reduce risks, and anticipate regulatory changes**, consolidating its position as a responsible actor in global maritime transport.

10. CONCLUSION AND CALL TO ACTION

The new European regulatory framework, incorporating **maritime transport into the EU ETS as of 2024**, turns the carbon cost into a **structural element of the maritime business.** It is no longer a voluntary option but a legal, financial, and reputational obligation whose management requires planning, experience, and rigor.
In this scenario, **anticipation is key to avoiding penalties**, protecting margins, and capitalizing on strategic opportunities in sustainability.

10.1 Strategic reasons to anticipate compliance

- **Avoid direct penalties** (100 €/t CO_2 not covered) and public reputational damage.
- **Take advantage of current** EUA market prices before their structural increase in 2026–2030.
- **Gain competitive advantage in tenders,** ESG-linked contracts, and access to green financing.
- **Avoid bottlenecks in verifications**, allowance deliveries, and Union Registry account openings.
- **Demonstrate climate leadership** in a sector historically excluded from reduction commitments.

10.2 Comparative costs of compliance vs penalty

A basic financial analysis shows that the cost of **compliance is always lower than the cost of non-compliance:**

Concept	Estimated cost per ton of CO_2
Current EUA price (market)	70-85 €/t
Non-compliance fine	100 €/t (direct penalty) + EUA
Reputational / ESG loss	Incalculable (exclusion from contracts, financing, licenses)

Furthermore, the penalty does **not exempt from the mandatory surrender of allowances**, meaning the operator must still purchase them later at a higher price.

10.3 Synergies with sustainability plans and ESG reports

Effective compliance with the EU ETS generates additional strategic value when integrated into the client's sustainability policies:

- **Alignment with ESG frameworks** (CSRD, SFDR, EU Green Taxonomy)
- **Use of the compliance certificate** as evidence for sustainable financing or green-bond issuance
- **Climate reputation before international shippers**, especially those requiring decarbonization proof
- **Improvement of non-financial indicators** in integrated and sustainability reports

Compliance is not only an obligation. It **is a competitive-positioning tool in a sector in transition.**

10.4 Nexus Green Energy as a trusted partner in maritime decarbonization

Nexus Green Energy combines **market access, legal security, technical support, and strategic vision** to offer its maritime-sector clients:

✅Guaranteed and traceable supply of EUAs
✅Personalized advisory in MRV, verification, and regulatory contracts
✅Scalable solutions for small, mixed, or transnational fleets
✅Competitive pricing with no fine print
✅Continuous support until 2030 with annual review

We invite shipowners, operators, and fleet managers to contact us today, request a free preliminary evaluation, and begin structuring a compliance plan commensurate with the new challenges of European maritime transport.

11. ANNEXES

11.1 Technical glossary (EU ETS, EUA, MRV, THETIS MRV, CBAM …)
11.2 Regulatory references and applicable regulations

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11.3 Template for monitoring-plan outline
11.4 Sample calculations by vessel category
11.5 Frequently Asked Questions (FAQs)
11.6 Reference contacts and support channels

NEXUS GREEN ENERGY is not merely a supplier. It is a strategic partner in the decarbonization of maritime transport.

Nexus Green Energy, SL
C/ Poeta Juan Maragall, 47
Pl. 1º, Oficina 105
28020 Madrid / Spain

Tel: (+34) 912 091 160
info@nexusgreenenergy.com

Aither Group AG