



The International Tracking Standard Foundation

Founders of I-REC

PRELIMINARY REPORT FOR INTEGRATION WITH EVIDENT REGISTRY SUSTAINIAM CIP PLATFORM OWNED BY FINBIRD TECHNOLOGIES PRIVATE LIMITED

2025

Notice from the I-TRACK Foundation

This report has been completed by a Platform Operator and is a disclosure form, required by the I-TRACK Foundation, to inform potential users about the functioning of the operator's Platform and its interaction with an Accredited Registry (Evident's Registry).

Potential and existing Platform users are to be informed that there are different ways to access I-REC(E) and participate in the market. Every I-REC(E) is validated by nationally appointed issuers and ownership records are maintained on the Evident I-REC(E) Registry. Throughout the lifecycle of an I-REC(E) certificate, from issuance to eventual redemption, the certificate ownership is determined and recorded in the I-REC(E) Registry. The Registry also provides basic functionalities including device registration, I-REC(E) transfers and I-REC(E) redemptions. These services are accessible to anyone who is registered in the Registry and can also be accessed through existing market players (e.g., Registrants and Participants) who are familiar with the rules and requirements of the International Attribute Tracking Standard and associated I-REC(E) Product Code.

However, the Registry can also be indirectly accessed via Accredited Platforms. These Platforms may provide different services, visualizations or tools which supplement the functionality provided by the Registry. However, use of a Platform is never mandatory for the issuance, trade, or redemption of I-REC(E). Users should, as a result, be informed of the Platforms they intend to make use of and determine if a Platform provides added value for them.

The I-TRACK Foundation and Evident periodically check that the Platform is adherent to the rules of Accreditation and well-integrated with the Registry. However, the Foundation, Evident Services or any Accredited Market Facilitator cannot be held responsible for the quality of services provided by Platform Operators.

If you have any further questions about the interaction between Platforms and the Evident Registry, please contact the I-TRACK Foundation secretariat at secretariat@trackingstandard.org.

Background

Who is the legal owner of the Platform?

Finbird Technologies Private Limited, Branded as Sustainiam

Main Contact Details

a) Sapna Nijhawan

b) sapna@sustainiam.com

What other role(s) does the company or broader group have within the Electricity Code or wishes to have in the near future?

- ☐ No other role
- ☒ Registrant
- ☒ Participant
- ☒ Other, namely: Beneficiary

Please provide a short description of the purpose of the Platform.

Sustainiam's CiP platform, streamlines device registration and green certificate generation, integrating seamlessly with the I-REC(E) Registry. It emphasizes traceability and security, offering Ownership Verification to project owners. CiP simplifies project implementation and account setup for an efficient user experience. CIP also simplifies small and large projects to earn I-REC(E) with enhanced management and analytics.

Please define the primary markets or jurisdictions in which the Platform will operate.

While our primary market focus is Asia and middle east, our systems are designed to be **dynamically scalable and globally adaptable** without any regional limitations. This ensures that we can seamlessly support users and partners across all geographies, with the flexibility to expand operations and services in any market as needed. Our infrastructure, localization framework, and compliance mechanisms are built to accommodate global demand while maintaining high performance and reliability at scale.

What languages does the Platform support?

English only at this time. We have enabled the **Internationalization framework** across our system, which allows us to support local languages based on each country's requirements. This localized approach ensures that users in every country where I-REC is active will be able to access the platform in their native language. By implementing full localization, we aim to improve accessibility, user experience, and regulatory alignment across all supported regions.

Registration and client contact

Please define the intended steps for various users of the Platform to be registered with the Platform Operator prior to use. Are legal agreements required? If so, are these prepared? If so, please include a link to the template agreement

1. User Registration & KYC/AML Verification

- Users must undergo an initial **KYC (Know Your Customer)** and **AML (Anti-Money Laundering)** verification process conducted by our team.
- Our verification includes checks on:
 - **Company directors** and their backgrounds
 - **Validity of registered business addresses**
 - **Existence and legal status of companies** through official national registries
 - **Cross-verification of company data** via local government open data platforms
 - **Bank account documents** for validating financial authenticity
 - **Authorized signatory verification** to confirm the individual's legal right to sign on behalf of the company

2. Device/Asset Registration Requirements

When registering a project or device, the following documents must be submitted for review and compliance validation:

- **Owner/Buyer's Declaration Letter**
- **Project Photographs** - Images of Meter, Facility, and satellite view of project boundary all Georeferenced.
- **Sample Metering Evidence**
- **Single Line Diagram (SLD)**
- **Power Purchase Agreement (PPA)**
- **Commissioning Agreement**

Depending on the project type and jurisdiction, additional documents such as the following may also be required:

- **Interconnection Agreement (To Grid)**
- **Responsible Party Form**
- **Letter of Confirmation**
- **Allocation statements** in case energy to sold to a third party.
- **Exchange reports** in-case the power is sold on Energy exchange

All submitted documentation is reviewed to ensure it meets the compliance standards of the relevant I-REC(E) Issuer.

3. Legal Agreements & Terms

- **Generators** must sign the **Platform Service Agreement** during onboarding.
- **Privacy Policy** (<https://sustainiam.com/privacy-policy/>)

How can users access the Platform and who can they contact for questions?

Users can access the platform at <https://cip.sustainiam.com>

They can contact our team at contact@sustainiam.com or support@sustainiam.com

They can also use the contact form inside the product. This leads to a ticketing-based helpdesk creation. Attaching a screenshot of the screen mentioned:

The screenshot displays the 'Help Centre' interface. On the left is a sidebar with the 'CiP' logo, a user profile for 'John company.... Bangalore, India', and navigation links for 'Dashboard', 'Projects', 'Issuance', 'OTHER', 'CIP Guide', 'Document Glossary', 'Settings', and 'Help'. At the bottom of the sidebar is a 'Limen Dash Tech Support' button. The main content area is titled 'Help Centre' and contains a greeting 'Hello, How we can help?' followed by the instruction 'Fill all the details to help your better'. Below this is a large form titled 'Write your query here!' with the subtitle 'Describe your issue'. The form includes a 'Subject' dropdown menu with the placeholder 'Select categories.....', an 'Issue' text area with the placeholder 'Describe your issue.....', and an 'Attachment' section with an upload icon and the text 'Upload your attachment'. At the bottom of the form are 'Cancel' and 'Send email' buttons.

Please provide a description of the fees associated with the use of the Platform (e.g., link to fee structure).

We charge 10% platform fee over on top of fees structure defined by Tracking standard and issuers.

Content

Who can use your platform? (more than one is possible)

- ☒ Registrants¹ registered in the Evident Registry

Ticking this box means that active Registrants in the Evident Registry can request facility registration and issuance requests with the responsible Issuer directly from the Platform.

- ☐ Participants² registered in the Evident Registry

Ticking this box means that active Participants can have an encumbrance account in the Platform

- ☐ Any Entity, regardless of its relationship with the Evident Registry

Ticking this box means that any entity passing the requirements of the Platform can create an account and benefit from the provided services of the Platform that will be linked with the Platform's custodian account in the Evident Registry.

Please describe in detail the functionality of your Platform.

A detailed step-by-step guide for all functionality is included in the user guide attached at the end of this document.

Current Capabilities:

1. Digital KYC during Sign up
2. Platform Integration- Sync with Evident to CiP
3. Device Registration across all Fuel Code
4. Issuance Request across all Fuel Code
5. Organizational User Management with Role Based Access Control (RBAC)

Future Capabilities:

1. Open New Account with Evident
2. Trade Certificates
3. Redeem Certificates
4. Encumbrance Trade & Redemption
5. Custodian Trade & Redemption

¹ A registrant is the only entity that is able to request device registration or certificate issuance. They can do this on behalf of a device owner or on their own behalf (if they themselves are device owners).

² A participant is a market player, trader or potentially a consumer with an account in Evident Registry and can hold, sell, buy, and redeem I-REC(E)s on their own behalf or on behalf of their clients.

6. **Seamless IoT-based automation** for real-time capture of renewable energy generation data
7. **Interactive analytics dashboards** designed for informed decision-making by market participants
8. **Integrated exchange mechanism for real-time market pricing, aligning demand and supply through dynamic pricing indices**
9. **Streamlined access to fractional RECs**, making procurement flexible and inclusive for buyers of all sizes
10. **Unified depository system** to hold certificates from multiple registered devices under a single wallet mechanism for easier tracking and settlement

How does the above functionality relate to the Accredited Registry (Evident's Registry)? Include at least an answer to the two questions below.

- 1) Please explain whether you work with a custodian account, encumbrance, or both.**
- 2) Please explain which of the following actions on the Evident Registry can be initiated from your Platform; request device registration, request issuance, withdraw I-RECs (from your platform to other platform or Participant account), Redeem I-RECs**

Our platform integrates with the Evident Registry to facilitate core functionalities related to I-REC management. From our platform, we fall into part (2) where users can initiate the following actions:

- **Request device registration:** Users can submit device registration requests directly through our platform. We collect the necessary technical and ownership data and pass it to I-REC(E) Issuer for review and approval.
- **Request issuance:** Once devices are registered and generation data becomes available, our platform enables users to request the issuance of I-RECs, including the submission of metering data and completion of necessary validation steps. Additionally, our platform supports issuance requests for devices that have been pre-registered directly with Evident.

Who is the owner of the I-REC(E) at any point in the life cycle?

It is assumed to be the user who holds the I-REC(E) in your platform until the point of redemption where the ownership will be the entity listed as the beneficiary, without further opportunity to pass on that ownership anymore.

Our platform is providing device registration and request issuance for the registrants only however owning IREC(E), transfer and redemption are the roles of Participant which are not available on this platform at this junction.

Which of the following best describe your platform (more than one are possible):

- ☐ Market, trade, or exchange functionality
- ☐ Facilitation of Redemptions and/or creation of Platform Redemption statements

- ☒ Visualization tool or creation of reports on usage
- ☐ Mechanism to support increased granularity
- ☒ Mechanism to support registration of small or distributed devices
- ☒ Platform to simplify the issuance process
- ☐ Platform only for internal use (back-office/mid-office use)
- ☒ Other, namely: Digital Payments

In the situation that the platform has a market, trade, or exchange functionality, has an agreement with an associated financial institution been discussed? Are there expectations as to the needs for associated collateral?

Not Applicable as the platform offers device registration and issuance for registrants.

Will you market your product as I-REC(E) on the Platform?

- ☒ Yes
- ☐ No

If 'No', this should be discussed in detail with the I-TRACK Foundation. The creation of another tradable instrument (by tokenization, for example) is, by default, forbidden.

Does your platform work on a blockchain? If so, do you intend to communicate benefits related of this externally? If so, how?

The I-TRACK Foundation is agnostic towards the use of a centralized or decentralized database. However, we remain critical towards unproven benefits such as the prevention of double counting in the wider I-REC(E) market. We encourage Platform Operators to discuss this with the I-TRACK Foundation.

No

Are there other Products on your Platform (e.g., other EACs, carbon credits)? If so, how are the different Products marketed? Will it be clear for users of your Platform which Product they purchase with each transaction?

No, in future scope. If any products are added in future a difference and marketing will be presenting to inform the users.

In case certificates can be redeemed directly on the Platform, please provide a screenshot of the template Redemption Statement users can expect when using this redemption service on the Platform.

Platform Operators shall use the redemption statement created on the Evident Registry, or at minimum, copy the QR code and verification key from the original statement.

Not Applicable as the platform offers device registration and issuance for registrants.

What design elements have been considered to ensure that live, tradable certificates cannot be perceived as being owned or redeemed by an End-User prior to the act of redemption?

Not Applicable as the platform offers device registration and issuance for registrants.

Where can users find more information about the Platform? (e.g., links to documentation)

Our user guide with detailed step by step breakdown and screenshots reference is at:

Hyperlink: [Sustainiam CIP guide V1-July 2025](#)

Manual URL: <https://sustainiam-my.sharepoint.com/:b:/p/pranav/EQchiKVsjvZGgTxLPqims9kBRYe3TTEIEADJ4Jyh95L9bw?e=m1uMqJ>