Joseph Langweiler

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31 July 2024

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By email and courier

The Arbitration Institute of the Finland Chamber of Commerce P.O. Box 1000 Fl-00101 Helsinki Finland info@arbitration.fi

Dear Mr. Sajakorpi,

On behalf of my client, *GreenHydro Ple*, I hereby submit the enclosed Request for Arbitration (RfA) pursuant to Article 6 of the Rules for Expedited Arbitration of the Finland Chamber of Commerce (FAI-Rules). A copy of the Power of Attorney authorizing me to represent *GreenHydro Ple* in this arbitration is enclosed as are the other required documents including Proof of Payment of the Filing Fee pursuant to Article 7 FAI-Rules.

The Claimant requests the performance of contractual obligations. The estimated monetary value of the claim in the sense of Article 6.3 (f) FAI-Rules is EUR 100 million. Respondent's contact details are set out in the RfA.

The contract giving rise to this arbitration provides that the seat of arbitration shall be Vindobona, Danubia, and that the arbitration shall be conducted in English. The arbitration agreement, which is largely a copy of the FAI "Combined arbitration clause", provides for the application of the FAI-Rules. In light of the amount in dispute and the complexity of the case, we consider the application of the Arbitration Rules of the Finland Chamber of Commerce (Arbitration Rules) to be more appropriate and we would suggest that, deviating from Article 19.1 (d) of the Arbitration Rules the third arbitrator should be appointed directly by the Arbitration Institute.

In case the Arbitration Institute decides for the application of the Arbitration Rules and three arbitrators, *GreenHydro Plc* hereby nominates Mr. Narvin Aqua as its arbitrator for confirmation.

Sincerely yours,

Joseph Langweiler

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Attachments:

Request for Arbitration with Exhibits

Power of Attorney (not reproduced)

CV of Mr. Aqua pursuant to Art. 6.3(h) Arbitration Rules (not reproduced)

Confirmation of Payment of Filing Fee pursuant to Art. 6.3 (i) FAI-Rules (not reproduced)

