

Services for Issuers: Communication of ownerships at request

April 2021

BME X

a SIX company



Introduction

Iberclear provides to the issuers a service channelling shareholder identification requests to its participants, so that the issuers may report the ownership details of their shareholders.

Additionally, due to the transposition into the Spanish law of Directive (EU) 2017/828 of the European Parliament and of the Council of May 17, 2017 amending Directive 2007/36 / EC with regard to the promotion of the long-term involvement of shareholders in listed companies, Iberclear provides, in addition to the shareholder identification service previously mentioned, the following services:

- Identification of shareholders and last beneficial owners.
- Specific identification of last beneficial owners.

The services provided to issuers are summarized below. For more information, you can consult PR 510 of the Arco System Procedures Manual "*Communication of ownership at request*", in which these services are described in more detail.

Services for Issuers. Communication of ownerships at request

Identification of shareholders.

01

The issuer will request Iberclear to identify shareholders to a specific date.

02

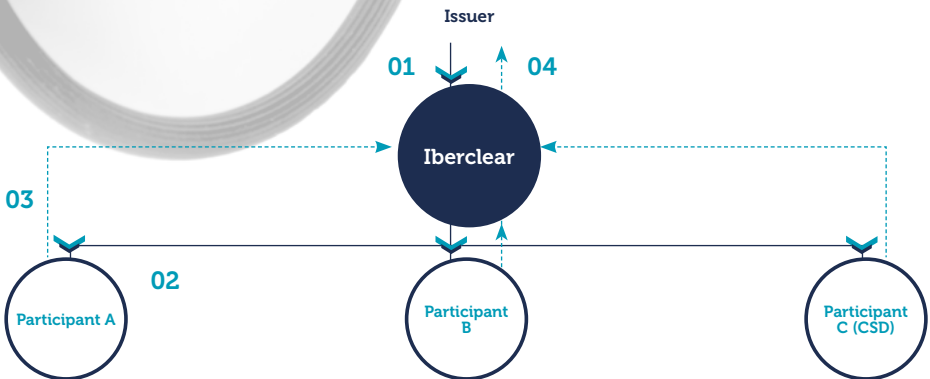
Participants shall notify Iberclear of ownerships of securities they have in their registry books.

03

Iberclear will request to its participants to communicate the ownership.

04

Once participants have transmitted the information indicating who their shareholders are, on a specific date, Iberclear will collect the information and send it to the Issuer.



Identification of shareholders and last beneficial owners

01

Issuers may request Iberclear to identify their shareholders and, additionally, in the event that the entity or person legitimized as a shareholder is an intermediary that holds shares on behalf of last beneficiaries or another intermediary, the identification of last beneficial owners.

02

Iberclear will transmit the issuer's request for information to its participants.

03

Participants shall transmit the issuer's request for information to their clients who are intermediaries and these to their own, following the chain of custody.

04

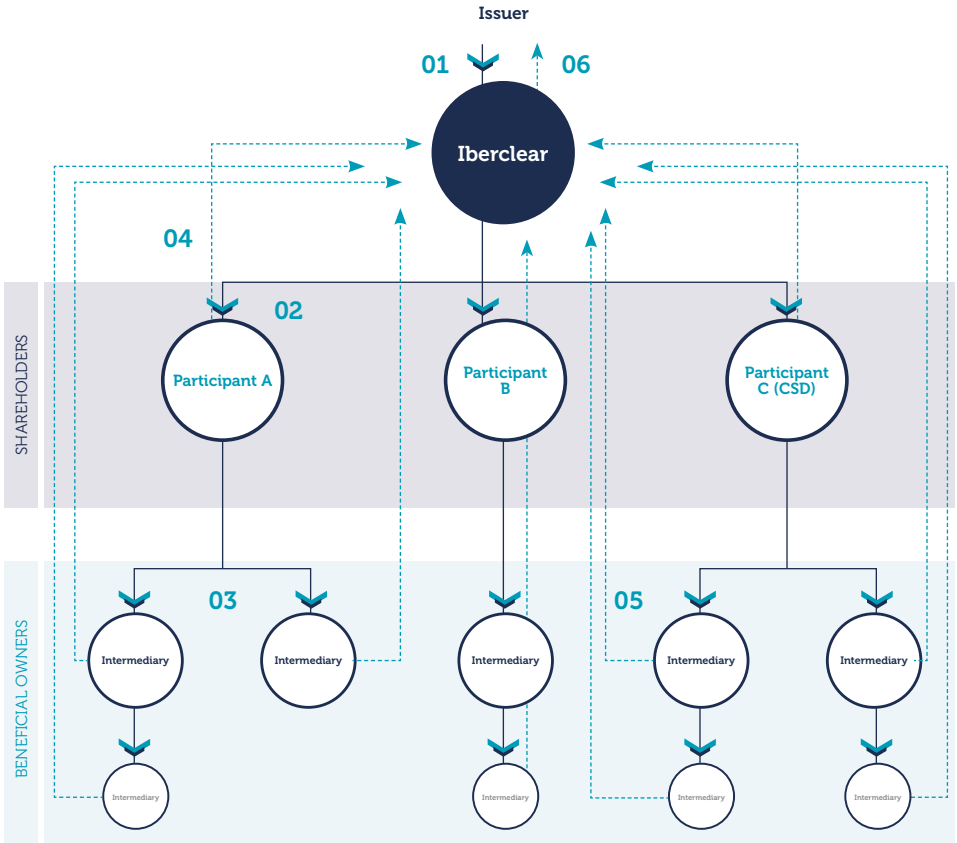
Participants shall notify Iberclear of ownerships of securities they have in their registry books.

05

The intermediaries of the chain of custody will directly communicate to Iberclear the information of their clients.

06

At the end of the deadline to send the information to Iberclear and once it is consolidated, Iberclear will send the information to the issuer.





Specific identification of last beneficial owners

01

The issuer may request identification of beneficial owners at the end of the chain of custody of an intermediary that is legitimised as a shareholder in the second-tier register of an Iberclear participant. The Issuer must specify which participant, account and CCV for which disclosure is requested.

02

Iberclear will transmit the issuer's request for information to the participant that owns the CCV that the issuer has requested disclosure.

03

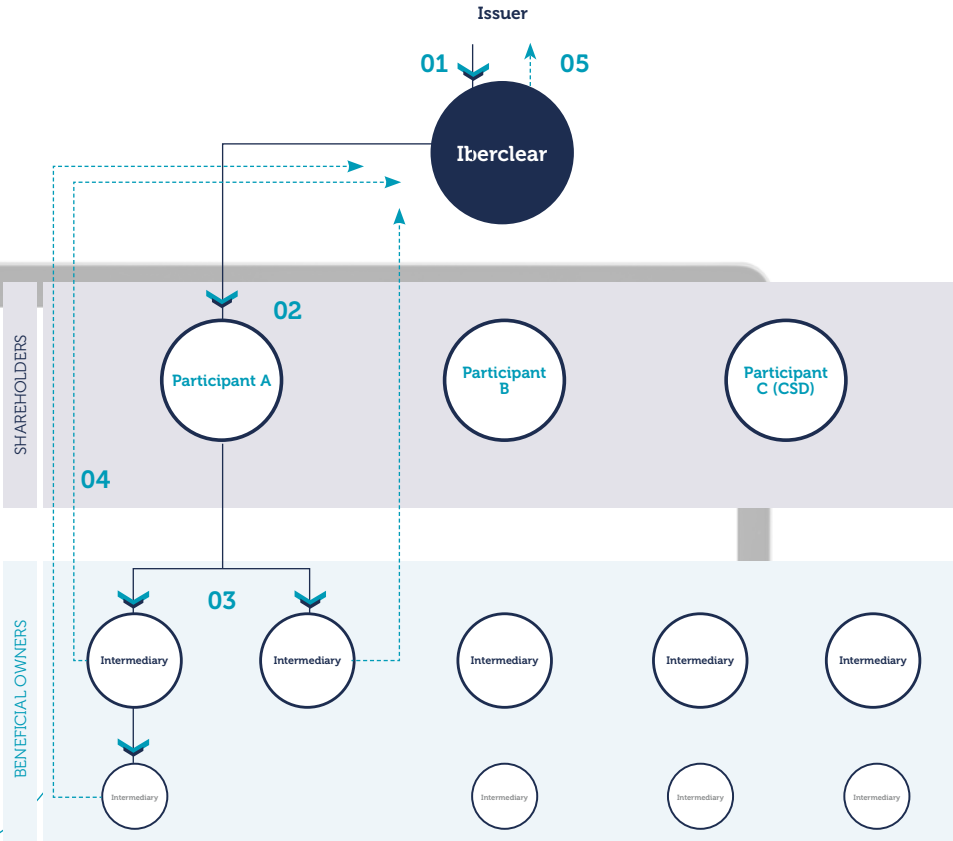
The participant will transmit to the requested CCVs the request for information from the issuer. Intermediaries will pass the request on to the next intermediary in the chain.

04

The intermediaries of the chain of custody will directly communicate to Iberclear the information of their clients

05

At the end of the term to send the information to Iberclear and once it is consolidated, Iberclear will send the information to the issuer.





Service Management

How to request the service?

To make the information request, issuers must access through the Iberclear interface, BME-PC, and make the request by filling in the required fields (ISIN code, type of request, record date, response deadline, etc.). Once the information has been validated, the request will be sent to the Iberclear participants.

In the case of the specific identification of last beneficial owners, it is based on the premise that the issuer knows the participant, account and CCV in which is the recognised position of the shareholder or shareholders requested to be disclosed because they have previously requested the shareholder identification service or because it is an issuer that maintains an updated shareholder register book.

Sending of responses by participants and intermediaries

Participants must send Iberclear the information of the shareholders and their positions at (quitar "the") Record Date before the deadline date and time established by the issuer.

The participant must complete the type of holding field, in which it is defined for each CCV if the shareholder is:

- NOMI: “Nominee” or intermediary that keeps or manages the shares on behalf of ultimate beneficiaries or other intermediaries.
- BENE: “Ultimate beneficiary”, who holds the effective holding of the securities
- OOAC: “On own account” report of own positions held in accounts in which balances are recorded on behalf of the entity itself and its clients.
- UKNW: “Unknown” It will be used when the type of holding cannot be classified.

Transmission to issuer

Once all participants and intermediaries responses have been received, Iberclear will reconcile the information and transmit it to the issuer through HTITU12 format for information related with identification of shareholders or through HTITU13 for information related with identification of last beneficial owners, through the channels set up for issuers.

For any questions or clarification, you can contact Iberclear at the following email address emisoresiberclear@grupobme.es

iberclear

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