Technical Manual for ATHEXCSD Participants

"SRD II Files/Messages in ISO 20022 Format"

Version: 1.6 – 19/11/2023

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Table of Revisions

Version	Date	Revision details – Reasons for change
1.0	08/10/2020	1st version – Description of ISO 20022 format files to be sent by email
1.1	30/10/2020	2nd version – Description of ISO 20022 format files/messages for SRD II services except from other corporate events (i.e. shareholder identification service, GM information forwarding service and GM service) and related communication channels
1.2	07/09/2021	3rd version – Forwarding of GM information and implementation of seev.048.001.01 - seev.049.001.01 messages via FIN PLUS, changes in wordings and addition of error code table in seev.049 identification request response status messages
1.3	21/11/2022	4th version - Addition of fields due to the circulation of the new version of the files in accordance with Standards MX Release Nov 2022, adopted by the Greek market.
1.4	28/02/2023	5th edition - Addition of detailed instructions for receiving ISO 20022 seev.004, seev.005 messages and sending seev.006, seev.007 messages via SWIFT
1.5	02/10/2023	6th edition - Addition of detailed instructions for receiving passwords in AXIA services and description of the three screens available for use by intermediaries (ad par.4.4, 4.5, 4.6, 4.7)
1.6	19/11/2023	7th version - Addition of fields due to the circulation of the new version of the files in accordance with Standards MX Release Nov 2022, adopted by the Greek market and deletion or par. 4.4, 4.5, 4.6, 4.7 because they will be part of an new technical manual

Table of Contents

1. DEFINITIONS AND FUNCTIONALITY OF ISO 20022 MESSAGES

According to the international market standards, the definitions and functionality of ISO 20022 messages are displayed below.

1.1 ISO 20022 GENERAL MEETING MESSAGES

The table below lists all the definitions of ISO 20022 general meeting messages.

	Message name	Abbr. Name	Message Identifier
Meeting Notification / announcements, entitlements and cancellation			
1	MeetingNotification	**MENO**	seev.001
2	MeetingCancellation	**MECN**	seev.002
3	MeetingEntitlementNotification	**MENT**	seev.003
Meeting Instruction and cancellation			
4	MeetingInstruction	**MEIN**	seev.004
5	MeetingInstructionCancellationRequest	**MEIC**	seev.005
6	MeetingInstructionStatus	**MEIS**	seev.006
7	MeetingVoteExecutionConfirmation	**MECO**	seev.007

1.2 ISO 20022 IDENTIFICATION MESSAGES

The table below lists all the definitions of ISO 20022 shareholder identification messages. Files/messages requesting shareholder identification and cancellation thereof (SIDR & SIDC) can be **sent via email** from ATHEXCSD and **via FIN PLUS**. Responses to the identification request from the Intermediaries are sent to ATHEXCSD, if designated as the Issuer Agent for such identification, in ISO 20022 format via email and via FIN PLUS (SIRE & SIRC) and corresponding response status messages (SIRS) are sent by ATHEXCSD.

Message name	Abbr. Name	Message Identifier
ShareholderIdentificationDisclosureRequest	SIDR	seev.045
ShareholderIdentificationDisclosureRequestCancellationAdvice	SIDC	seev.046
ShareholderIdentificationDisclosureResponse	SIRE	seev.047
ShareholderIdentificationDisclosureResponseCancellationAdvice	SIRC	seev.048
ShareholderIdentificationDisclosureResponseStatusAdvice	SIRS	seev.049

2   SENDING OF STANDARDIZED FILES BY ATHEXGROUP **TO PARTICIPANTS ON BEHALF OF ISSUERS**

ISO 20022 format files will be sent by ATHEXCSD via axia@athexgroup.gr and via FIN PLUS

2.1   Forwarding of the General Meeting Notification (initial submission and updating of the notice)

When an issuer holds a GM and sends out its notification (initial submission), ATHEXCSD will send the GM data to the Participants in an ISO 20022 format file via email from axia@athexgroup.gr or via FIN PLUS. The same will be done in every case where the GM data is **updated**, as well as in case of **cancellation of** the GM.

With regards to the exchange of information of SRD II General Meeting or shareholder identification messages in the SWIFT FIN PLUS environment, Intermediaries may send an RMA request to ATHEXCSD using the following information:
BIC: HCSDGRAAXXX
DN on SWIFT FINplus: ou=xxx,o=hcsdgraa,o=swift

(For information, please contact the Accounts & Registry Services Department at isd@athexgroup.gr or (+30) 210 3366776)

Key fields of the file: Type of notice; ref. no. & date; ISIN code; company name; date/time/type of the GM; minimum required quorum for the GM; venue; date of recording; URL hyperlink of the GM material.

The **initial GM notice** file **(NEWM)** will have the following format:

```
<Document xmlns="urn:iso:std:iso:20022:tech:xsd:seev.001.001.10">
 <MtgNtfctn>
  <NtfctnGnlInf>
   <NtfctnTp>NEWM</NtfctnTp>
   <NtfctnSts>
    <EvtCmpltnsSts>COMP</EvtCmpltnsSts>
    <EvtConfSts>CONF</EvtConfSts>
   </NtfctnSts>
   <ShrhldrRghtsDrctvInd>true</ShrhldrRghtsDrctvInd>
  </NtfctnGnlInf>
  <Mtg>
   <MtgId>106217</MtgId>
   <IssrMtgId>2022 19191</IssrMtgId>
   <Tp>XMET</Tp>
   <AnncmntDt>
    <DtTm>2022-11-09T10:00:00.000Z</DtTm>
   </AnncmntDt>
   <Prtcptn>
    <PrtcptnMtd>
     <Cd>EVOT</Cd>
    </PrtcptnMtd>
    <IssrDdlnForVtng>
```

```
    <DtOrDtTm>
      <DtTm>2022-11-12T09:00:00.000Z</DtTm>
    </DtOrDtTm>
   </IssrDdlnForVtng>
   <SpprtdByAcctSvcr>true</SpprtdByAcctSvcr>
   <RspnDdlnForVtng>
    <DtOrDtTm>
      <DtTm>2022-11-12T09:00:00.000Z</DtTm>
    </DtOrDtTm>
   </RspnDdlnForVtng>
  </Prtcptn>
  <Prtcptn>
   <PrtcptnMtd>
    <Cd>VIRT</Cd>
   </PrtcptnMtd>
   <IssrDdlnForVtng>
    <DtOrDtTm>
      <DtTm>2022-12-12T09:00:00.000Z</DtTm>
    </DtOrDtTm>
   </IssrDdlnForVtng>
   <SpprtdByAcctSvcr>true</SpprtdByAcctSvcr>
   <RspnDdlnForVtng>
    <DtOrDtTm>
      <DtTm>2022-12-12T09:00:00.000Z</DtTm>
    </DtOrDtTm>
   </RspnDdlnForVtng>
  </Prtcptn>
  <Prtcptn>
   <PrtcptnMtd>
    <Cd>PRXY</Cd>
   </PrtcptnMtd>
   <IssrDdlnForVtng>
    <DtOrDtTm>
      <DtTm>2022-12-10T09:00:00.000Z</DtTm>
    </DtOrDtTm>
   </IssrDdlnForVtng>
   <SpprtdByAcctSvcr>true</SpprtdByAcctSvcr>
   <RspnDdlnForVtng>
    <DtOrDtTm>
      <DtTm>2022-12-10T09:00:00.000Z</DtTm>
    </DtOrDtTm>
   </RspnDdlnForVtng>
  </Prtcptn>
 <AddtlDcmnttnURLAdr>https://axia.athexgroup.gr/demo2020</AddtlDcmnttnURLAdr>
  <AddtlPrcdrDtls>
    <AddtlRght>
     <Prtry>
      <Id>1</Id>
      <SchmeNm>Information request 141par6</SchmeNm>
      <Issr>COMPANY SA.</Issr>
```

```
        </Prtry>
       </AddtlRght>
       <AddtlRghtMktDdln>
        <DtOrDtTm>
         <DtTm>2021-09-02T21:00:00.000Z</DtTm>
        </DtOrDtTm>
       </AddtlRghtMktDdln>
      </AddtlPrcdrDtls>
      <EntitlmntFxgDt>
       <Dt>
        <Dt>2022-12-06Z</Dt>
       </Dt>
       <DtMd>EODY</DtMd>
      </EntitlmntFxgDt>
     </Mtg>
     <MtgDtls>
      <DtAndTm>
       <DtOrDtTm>
        <DtTm>2022-12-12T09:00:00.000Z</DtTm>
       </DtOrDtTm>
      </DtAndTm>
      <QrmReqrd>true</QrmReqrd>
      <Lctn>
       <Adr>
        <StrtNm>L. ATHINON 110</StrtNm>
        <Ctry>GR</Ctry>
       </Adr>
      </Lctn>
      <QrmQty>
       <QrmQtyPctg>20.</QrmQtyPctg>
      </QrmQty>
     </MtgDtls>
     <Issr>
      <Id>
       <LEI>549300UNB6JCR0XZT864</LEI>
      </Id>
     </Issr>
     <Scty>
      <FinInstrmId>
       <ISIN>GRS470003013</ISIN>
      </FinInstrmId>
     </Scty>
     <Rsltn>
      <IssrLabl>1.1</IssrLabl>
      <Desc>
       <Lang>en</Lang>
       <Titl>issue a</Titl>
       <Desc>blabla</Desc>
      </Desc>
      <ForInfOnly>false</ForInfOnly>
```

```xml
    <VoteTp>BNDG</VoteTp>
    <Sts>ACTV</Sts>
    <VoteInstrTp>
     <VoteInstrTpCd>
      <Tp>ABST</Tp>
     </VoteInstrTpCd>
    </VoteInstrTp>
    <VoteInstrTp>
     <VoteInstrTpCd>
      <Tp>CAGS</Tp>
     </VoteInstrTpCd>
    </VoteInstrTp>
    <VoteInstrTp>
     <VoteInstrTpCd>
      <Tp>CFOR</Tp>
     </VoteInstrTpCd>
    </VoteInstrTp>
   </Rsltn>
   <Vote>
    <PrtlVoteAllwd>true</PrtlVoteAllwd>
    <SpltVoteAllwd>true</SpltVoteAllwd>
    <VoteMthds>
     <VoteThrghNtwk>
<VoteDrctlyToIssr>HCSDGRAAXXX</VoteDrctlyToIssr>
</VoteThrghNtwk>
     <VoteByMail>
      <EmailAdr>SRDII_DSSOperators@athexgroup.gr</EmailAdr>
     </VoteByMail>
     <ElctrncVote>
      <URLAdr>https://www.athexgroup.gr/web/guest/srd-ii</URLAdr>
     </ElctrncVote>
    </VoteMthds>
    <BnfclOwnrDsclsr>true</BnfclOwnrDsclsr>
   </Vote>
  </MtgNtfctn>
</Document>
```

 The replacement file (REPL) of the GM notice will have the following format:

```xml
<Document xmlns="urn:iso:std:iso:20022:tech:xsd:seev.001.001.10">
 <MtgNtfctn>
  <NtfctnGnlInf>
   <NtfctnTp>REPL</NtfctnTp>
   <NtfctnSts>
    <EvtCmpltnsSts>COMP</EvtCmpltnsSts>
    <EvtConfSts>CONF</EvtConfSts>
   </NtfctnSts>
   <ShrhldrRghtsDrctvInd>true</ShrhldrRghtsDrctvInd>
  </NtfctnGnlInf>
  <NtfctnUpd>
```

```
      <PrvsNtfctnId>1538</PrvsNtfctnId>
    </NtfctnUpd>
    <Mtg>
     <MtgId>106217</MtgId>
     <IssrMtgId>2022 19191</IssrMtgId>
     <Tp>XMET</Tp>
     <AnncmntDt>
      <DtTm>2022-11-09T10:00:00.000Z</DtTm>
     </AnncmntDt>
     <Prtcptn>
      <PrtcptnMtd>
       <Cd>EVOT</Cd>
      </PrtcptnMtd>
      <IssrDdlnForVtng>
       <DtOrDtTm>
        <DtTm>2022-11-12T09:00:00.000Z</DtTm>
       </DtOrDtTm>
      </IssrDdlnForVtng>
      <SpprtdByAcctSvcr>true</SpprtdByAcctSvcr>
      <RspnDdlnForVtng>
       <DtOrDtTm>
        <DtTm>2022-11-12T09:00:00.000Z</DtTm>
       </DtOrDtTm>
      </RspnDdlnForVtng>
     </Prtcptn>
     <Prtcptn>
      <PrtcptnMtd>
       <Cd>VIRT</Cd>
      </PrtcptnMtd>
      <IssrDdlnForVtng>
       <DtOrDtTm>
        <DtTm>2022-12-12T09:00:00.000Z</DtTm>
       </DtOrDtTm>
      </IssrDdlnForVtng>
      <SpprtdByAcctSvcr>true</SpprtdByAcctSvcr>
      <RspnDdlnForVtng>
       <DtOrDtTm>
        <DtTm>2022-12-12T09:00:00.000Z</DtTm>
       </DtOrDtTm>
      </RspnDdlnForVtng>
     </Prtcptn>
     <Prtcptn>
      <PrtcptnMtd>
       <Cd>PRXY</Cd>
      </PrtcptnMtd>
      <IssrDdlnForVtng>
       <DtOrDtTm>
        <DtTm>2022-12-10T09:00:00.000Z</DtTm>
       </DtOrDtTm>
      </IssrDdlnForVtng>
```

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```
      <SpprtdByAcctSvcr>true</SpprtdByAcctSvcr>
      <RspnDdlnForVtng>
       <DtOrDtTm>
        <DtTm>2022-12-10T09:00:00.000Z</DtTm>
       </DtOrDtTm>
      </RspnDdlnForVtng>
     </Prtcptn>
 <AddtlDcmnttnURLAdr>https://axia.athexgroup.gr/demo2020</AddtlDcmnttnURLAdr>
 <AddtlPrcdrDtls>
      <AddtlRght>
       <Prtry>
        <Id>1</Id>
        <SchmeNm>Information request 141par6</SchmeNm>
        <Issr>COMPANY SA.</Issr>
       </Prtry>
      </AddtlRght>
      <AddtlRghtMktDdln>
       <DtOrDtTm>
        <DtTm>2021-09-02T21:00:00.000Z</DtTm>
       </DtOrDtTm>
      </AddtlRghtMktDdln>
     </AddtlPrcdrDtls>
     <EntitlmntFxgDt>
      <Dt>
       <Dt>2022-12-06Z</Dt>
      </Dt>
      <DtMd>EODY</DtMd>
     </EntitlmntFxgDt>
    </Mtg>
    <MtgDtls>
     <DtAndTm>
      <DtOrDtTm>
       <DtTm>2022-12-12T09:00:00.000Z</DtTm>
      </DtOrDtTm>
     </DtAndTm>
     <QrmReqrd>true</QrmReqrd>
     <Lctn>
      <Adr>
       <StrtNm>L. ATHINON 110</StrtNm>
       <Ctry>GR</Ctry>
      </Adr>
     </Lctn>
     <QrmQty>
      <QrmQtyPctg>20.</QrmQtyPctg>
     </QrmQty>
    </MtgDtls>
    <Issr>
     <Id>
      <LEI>549300UNB6JCR0XZT864</LEI>
     </Id>
```

```
    </Issr>
    <Scty>
     <FinInstrmId>
      <ISIN>GRS470003013</ISIN>
     </FinInstrmId>
    </Scty>
    <Rsltn>
     <IssrLabl>1.1</IssrLabl>
     <Desc>
      <Lang>en</Lang>
      <Titl>issue a</Titl>
      <Desc>blabla</Desc>
     </Desc>
     <ForInfOnly>false</ForInfOnly>
     <VoteTp>BNDG</VoteTp>
     <Sts>ACTV</Sts>
     <VoteInstrTp>
      <VoteInstrTpCd>
       <Tp>ABST</Tp>
      </VoteInstrTpCd>
     </VoteInstrTp>
     <VoteInstrTp>
      <VoteInstrTpCd>
       <Tp>CAGS</Tp>
      </VoteInstrTpCd>
     </VoteInstrTp>
     <VoteInstrTp>
      <VoteInstrTpCd>
       <Tp>CFOR</Tp>
      </VoteInstrTpCd>
     </VoteInstrTp>
    </Rsltn>
    <Vote>
     <PrtlVoteAllwd>true</PrtlVoteAllwd>
     <SpltVoteAllwd>true</SpltVoteAllwd>
     <VoteMthds>
      <VoteThrghNtwk>
<VoteDrctlyToIssr>HCSDGRAAXXX</VoteDrctlyToIssr>
</VoteThrghNtwk>
      <VoteByMail>
       <EmailAdr>SRDII_DSSOperators@athexgroup.gr</EmailAdr>
      </VoteByMail>
      <ElctrncVote>
       <URLAdr>https://www.athexgroup.gr/web/guest/srd-ii</URLAdr>
      </ElctrncVote>
     </VoteMthds>
     <BnfclOwnrDsclsr>true</BnfclOwnrDsclsr>
    </Vote>
   </MtgNtfctn>
  </Document>
```

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2.2 Forwarding of the cancellation of the General Meeting

The ISO 20022 format file for the Meeting cancellation (CANC) will have the following format with the following **key fields**: Type of notice; ref. no & date; date/time/type of the GM; ISIN code; reason for cancellation.

```
<Document xmlns="urn:iso:std:iso:20022:tech:xsd:seev.002.001.09">
 <MtgCxl>
  <MtgRef>
   <MtgId>82893</MtgId>
   <IssrMtgId>1234/2020</IssrMtgId>
   <Tp>XMET</Tp>
   <Issr>
    <NmAndAdr>
     <Nm>COMPANY S.A</Nm>
     <Adr>
      <StrtNm>THESI GORITSA</StrtNm>
      <Ctry>GR</Ctry>
     </Adr>
    </NmAndAdr>
   </Issr>
  </MtgRef>
  <Scty>
   <FinInstrmId>
    <ISIN>GRS275073005</ISIN>
   </FinInstrmId>
  </Scty>
  <Rsn>
   <CxlRsnCd>
    <Cd>WITH</Cd>
   </CxlRsnCd>
  </Rsn>
 </MtgCxl>
</Document>
```

2.3 Forwarding of shareholder identification request

If an Issuer wishes to know the details of its shareholders, it should send a shareholder identification request. The request will be sent to ATHEXCSD as the Central Securities Depository (CSD) and first intermediary in the chain, it will be modified into an ISO 20022 format and then forwarded to the Participants, on behalf of the issuer, from axia@athexgroup.gr or via FIN PLUS.

In connection with the forwarding of information of SRD II General Meeting or shareholder identification messages, in order to perform key exchange (RMA) in the SWIFT FIN PLUS

environment, Intermediaries may send an RMA request to ATHEXCSD using the following information:
BIC: HCSDGRAAXXX
DN on SWIFT FINplus: ou=xxx,o=hcsdgraa,o=swift

(For information, please contact the Accounts & Registry Services Department at isd@athexgroup.gr or (+30) 210 3366776)

The **ISO 20022 format file of the shareholder identification request** will have the following format:

ShareholdersIdentificationDisclosureRequest - seev.045.001.04

```
<Document xmlns="urn:iso:std:iso:20022:tech:xsd:seev.045.001.04"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">
 <ShrhldrsIdDsclsrReq>
  <IssrDsclsrReqId>TEST553OPAP</IssrDsclsrReqId>
  <DsclsrReqTp>NEWM</DsclsrReqTp>
  <FwdReqInd>true</FwdReqInd>
  <RspnThrghChainInd>false</RspnThrghChainInd>
  <ShrhldrRghtsDrctvInd>true</ShrhldrRghtsDrctvInd>
  <FinInstrmId>
   <ISIN>GRS419003009</ISIN>
  </FinInstrmId>
  <ShrhldrsDsclsrRcrdDt>
   <Dt>
    <Dt>2022-09-26</Dt>
   </Dt>
  </ShrhldrsDsclsrRcrdDt>
  <DsclsrRspnRcpt>
   <Id>
    <LEI>213800T8UR2VI6Q2RH18</LEI>
   </Id>
   <RcptNm>HELLENIC CENTRAL SECURITIES DEPOSIT</RcptNm>
   <RspnRcptAdr>
    <AnyBIC>HCSDGRAAXXX</AnyBIC>
    <EmailAdr>ISD@athexgroup.gr</EmailAdr>
   </RspnRcptAdr>
  </DsclsrRspnRcpt>
  <IssrDsclsrDdln>
   <Dt>
    <DtTm>2022-09-30T11:46:00Z</DtTm>
   </Dt>
  </IssrDsclsrDdln>
 </ShrhldrsIdDsclsrReq>
</Document>
```

2.4   Forwarding of cancellation of a shareholder identification request

The **ISO 20022 format file of the cancellation of the shareholder identification request**, in accordance with the international market standards, will have the following format:

ShareholdersIdentificationDisclosureRequestCancellationAdvice - seev.046.001.01

Example 1: Scenario Description
On 17th of October 2019 at 9:00 AM, the Issuer Agent (ISUABEBBXXX) sends to the first intermediary (INTAFRPP666) a cancellation advice message in order to withdraw the shareholders identification disclosure request that was sent 2 days earlier since the general meeting that was scheduled in November has been postponed.

Message Instance (with application header)

```
<AppHdr xmlns="urn:iso:std:iso:20022:tech:xsd:head.001.001.02"
xmlns:n1="http://www.w3.org/2000/09/xmldsig#">
    <Fr>
        <FIId>
            <FinInstnId>
                <BICFI>ISUABEBBXXX</BICFI>
            </FinInstnId>
        </FIId>
    </Fr>
    <To>
        <FIId>
            <FinInstnId>
                <BICFI>INTAFRPP666</BICFI>
            </FinInstnId>
        </FIId>
    </To>
    <BizMsgIdr>ISUABE000000002</BizMsgIdr>
    <MsgDefIdr>seev.046.001.01</MsgDefIdr>
    <CreDt>2019-10-17T09:00:00Z</CreDt>
</AppHdr>
<Document xmlns="urn:iso:std:iso:20022:tech:xsd:seev.046.001.01"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">
    <ShrhldrsIdDsclsrReqCxlAdvc>
        <IssrDsclsrReqRef>
            <IssrDsclsrReqId> ISUA-DISCL-2019-0001</IssrDsclsrReqId>
            <FinInstrmId>
```

```
                <ISIN>BE7876543087</ISIN>
            </FinInstrmId>
            <ShrhldrsDsclsrRcrdDt>
                <Dt>
                    <Dt>2019-10-30</Dt>
                </Dt>
            </ShrhldrsDsclsrRcrdDt>
        </IssrDsclsrReqRef>
        <CxlRsn>WITH</CxlRsn>
        <Issr>
            <NmAndAdr>
                <Nm>Electronic Industrial Inc.</Nm>
            </NmAndAdr>
        </Issr>
    </ShrhldrsIdDsclsrReqCxlAdvc>
</Document>
```

2.5 Forwarding of confirmations of receipt of electronic votes

Where an issuer holds a GM by electronic vote, immediately after voting at the GM takes place, it should send the voting confirmations to all shareholders.

If the issuer is unable to send directly to shareholders or their intermediaries the confirmations of receipt of electronic votes, it has the right to use the chain of intermediaries in order to have these confirmations sent to the person who voted. It is a prerequisite that the issuer provides ATHEXCSD with all the required fields of the ISO 20022 message format, so that the information can be forwarded further down the chain to the final shareholder.

In this case, ATHEXCSD, in its capacity as Issuer CSD, ATHEXCSD will be able to forward to the Participants indicated by the Issuer the confirmations of receipt of electronic votes on its behalf, in an ISO 20022 format file from axia@athexgroup.gr or via FIN PLUS, with the following **key fields**, among others:
Unique identifier of the receipt and event; message type; ISIN code; date of GM; name of the issuer; name of the confirming party; name of the person who voted; name of the shareholder; name of the DSS Participant.

The **ISO 20022 format file of the confirmation of receipt of electronic votes**, in accordance with the international market standards, will have the following format per example described below:

MeetingInstructionStatus - seev.006.001.09
Example 1
This example describes how the meeting instruction status message is used to confirm the processing or rejection status of a meeting instruction message.
Terms

A fund manager (FUMAUS33) sent on 11 April a split voting instruction related to the Big Corp general meeting to a custodian (GLOBUS33) on behalf of Fund ABC. The custodian uses the meeting instruction status message to confirm the acceptance and forwarding along the chain of this instruction for the Fund ABC account.

The following graphic shows the flow of messages described in this example:

Message Instance

```
<MtgInstrSts>
        <InstrTp>
                <InstrId>I001</InstrId>
        </InstrTp>
        <MtgRef>
                <IssrMtgId>LS001</IssrMtgId>
                <MtgDtAndTm>2019-04-28T11:00:00</MtgDtAndTm>
                <Tp>GMET</Tp>
                <Lctn>
                        <AdrLine>Great Hall at Kensington Town Hall</AdrLine>
                        <StrtNm>Hornton Street</StrtNm>
                        <PstCd>W87NX</PstCd>
                        <TwnNm>London</TwnNm>
                        <Ctry>GB</Ctry>
                </Lctn>
        </MtgRef>
        <FinInstrmId>
                <ISIN>GB3333A53L22</ISIN>
        </FinInstrmId>
        <InstrTpSts>
                <InstrSts>
                        <DtldInstrSts>
                                <SnglInstrId>ABC123</SnglInstrId>
                                <AcctId>123456</AcctId>
                                <InstrSts>
                                        <PrcgSts>
                                                <Sts>FRWD</Sts>
                                        </PrcgSts>
                                </InstrSts>
                        </DtldInstrSts>
```

```
                </InstrSts>
            </InstrTpSts>
                    <CnfrmgPty>
                <LglPrsn>
                    <NmAndAdr>
                        <Nm>Global Custodian PLC</Nm>
                    </NmAndAdr>
                    <Id>
                        <AnyBIC>GLOBUS33</AnyBIC>
                    </Id>
                </LglPrsn>
            </CnfrmgPty>
            <VoteCstgPty>
                <LglPrsn>
                    <NmAndAdr>
                        <Nm>FUND XYZ</Nm>
                    </NmAndAdr>
                    <Id>
                        <AnyBIC>FUMAUS33</AnyBIC>
                    </Id>
                </LglPrsn>
            </VoteCstgPty>
        </MtgInstrSts>
```

Example 2

The second example describes how the meeting instruction status message is used to confirm the cancellation of a meeting instruction message.

Terms

A fund manager (FUMAUS33) sent a vote instruction to a custodian (GLOBUS33) for the account of Fund DEF.

As the Sender made an error, a MeetingInstructionCancellationRequest was sent to cancel the previous instruction (see example in MeetingInstruction chapter).

The custodian confirms the cancellation via a MeetingInstructionStatus message.

The following graphic shows the flow of messages described in this example.

Message Instance

```
<MtgInstrSts>
    <InstrTp>
        <InstrCxlId>I004</InstrCxlId>
    </InstrTp>
    <MtgRef>
        <IssrMtgId>LS001</IssrMtgId>
        <MtgDtAndTm>2019-04-28T11:00:00</MtgDtAndTm>
        <Tp>GMET</Tp>
        <Lctn>
            <AdrLine>Great Hall at Kensington Town Hall</AdrLine>
            <StrtNm>Hornton Street</StrtNm>
            <PstCd>W87NX</PstCd>
            <TwnNm>London</TwnNm>
            <Ctry>GB</Ctry>
        </Lctn>
    </MtgRef>
    <FinInstrmId>
        <ISIN>GB3333A53L22</ISIN>
    </FinInstrmId>
    <InstrTpSts>
        <CxlSts>
            <GblCxlSts>
                <PrcgSts>
                    <Sts>CAND</Sts>
                </PrcgSts>
            </GblCxlSts>
        </CxlSts>
    </InstrTpSts>
    <CnfrmgPty>
        <LglPrsn>
            <NmAndAdr>
                <Nm>Global Custodian PLC</Nm>
            </NmAndAdr>
            <Id>
                <AnyBIC>GLOBUS33</AnyBIC>
```

```
                                  </Id>
                            </LglPrsn>
                      </CnfrmgPty>
                      <VoteCstgPty>
                            <LglPrsn>
                                  <NmAndAdr>
                                        <Nm>FUND XYZ</Nm>
                                  </NmAndAdr>
                                  <Id>
                                        <AnyBIC>FUMAUS33</AnyBIC>
                                  </Id>
                            </LglPrsn>
                      </VoteCstgPty>
            </MtgInstrSts>
```

2.6 Forwarding of confirmations of recording and counting of votes

In the event that a request is submitted to the Issuer for the receipt of a confirmation of the recording and counting of votes by a shareholder or their proxy within 3 months of the voting date, the Issuer must issue a confirmation to the shareholder that their vote has been recorded and counted as valid by the Issuer.

In the event that the issuer is unable to send directly to shareholders or their intermediaries the confirmations of the recording and counting of votes, it has the right to use the chain of intermediaries to send these confirmations to the shareholders. It is a prerequisite to provide ATHEXCSD with all the required fields of the ISO 20022 message format, so that the information can be forwarded further down the chain to the final shareholder.

In this case, ATHEXCSD, in its capacity as the Issuer CSD, will forward to the Participants nominated by the Issuer the confirmations of the votes' recording and counting on its behalf, in an ISO 20022 format file from email axia@athexgroup.gr or via FIN PLUS, with the following **key fields** among others:
Unique identifier of the confirmation and event; message type; ISIN code; date of GM; name of the issuer; name of the shareholder; name of the DSS Participant; name of third party nominated by the shareholder; method, date and time of receipt; unique vote identifier.

The **ISO 20022 format file of the confirmation of the recording and counting of votes**, in accordance with the international market standards, will have the following format according to the example described below:

MeetingVoteExecutionConfirmation - seev.007.001.09

Example
Terms
On 11 April, a fund manager (FUMAUS33) sent a meeting instruction related to the Big Corp general meeting (see example 1 in the MeetingInstruction chapter) to a custodian (GLOBUS33).
On 1 May, the custodian confirms that the voting instruction has been executed at the shareholders meeting.

The following graphic shows the flow of messages described in this example.
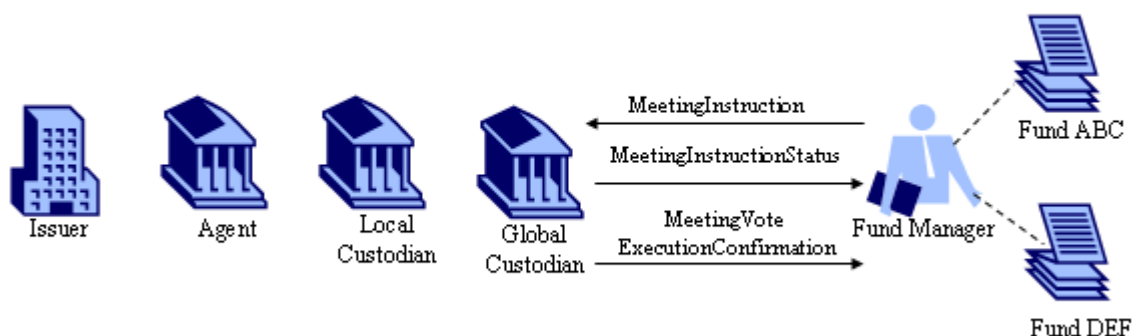
Message Instance

```
<MtgVoteExctnConf>
        <MtgInstrId>I001</MtgInstrId>
        <MtgRef>
                <IssrMtgId>LS001</IssrMtgId>
                <MtgDtAndTm>2019-04-28T11:00:00</MtgDtAndTm>
                <Tp>GMET</Tp>
                <Lctn>
                        <AdrLine>Great Hall at Kensington Town Hall</AdrLine>
                        <StrtNm>Hornton Street</StrtNm>
                        <PstCd>W87NX</PstCd>
                        <TwnNm>London</TwnNm>
                        <Ctry>GB</Ctry>
                </Lctn>
        </MtgRef>
        <FinInstrmId>
                <ISIN>GB3333A53L22</ISIN>
        </FinInstrmId>
        <VoteInstrs>
                <SnglInstrId>ABC123</SnglInstrId>
                <StgInstr>true</StgInstr>
                <ModltyOfCntg>
                        <Cd>PVAM</Cd>
                </ModltyOfCntg>
                <VotePerRsltn>
                        <IssrLabl>1</IssrLabl>
                        <For>
                                <Unit>250</Unit>
                        </For>
                </VotePerRsltn>
                <VotePerRsltn>
                        <IssrLabl>2</IssrLabl>
                        <Agnst>
                                <Unit>80</Unit>
                        </Agnst>
                        <Abstn>
                                <Unit>170</Unit>
                        </Abstn>
```

```
            </VotePerRsltn>
            <VotePerRsltn>
                    <IssrLabl>3</IssrLabl>
                    <For>
                            <Unit>170</Unit>
                    </For>
                    <Agnst>
                            <Unit>30</Unit>
                    </Agnst>
                    <Abstn>
                            <Unit>50</Unit>
                    </Abstn>
            </VotePerRsltn>
        </VoteInstrs>
    </MtgVoteExctnConf>
```

3. SENDING OF STANDARDIZED FILES BY INTERMEDIARIES VIA ATHEXGROUP TO ISSUERS

In the event that a Participant is unable to send directly to the Issuer a record of a shareholder's notice of participation in a General Meeting or confirmation of the entitlement to exercise shareholder's rights or a request for confirmation of the recording and counting of votes, it has the right to use the chain of intermediaries in order to have these records with shareholders' information forwarded to the Issuer. In this case, **ATHEXCSD, in its capacity as the Issuer CSD** and upon receiving the files from the Participant in ISO 20022 format, will forward them to the Issuer.

More specifically, Participants may send to the Athens Exchange Group at **SRDII_DSSOperators@athexgroup.gr** or via FIN PLUS the information specified in the SRD II framework on behalf of the shareholders for the purpose of forwarding it to the Issuers, by means of the following standard files/messages, which according to the SRD II framework should be in electronic and machine-readable format, enabling interoperability and automated processing, and employ internationally applicable industry standards, such as ISO standards or a methodology compatible with ISO standards:

- **Shareholders' notice of participation in a General Meeting,** in order to forward the Shareholder's electronic vote or the appointment of a proxy or the Shareholder's request for confirmation of the recording and counting of votes

- **Confirmation of entitlements to exercise Shareholder's rights,** in order to prove the shareholder status of a Shareholder who has not been fully identified by the Issuer

In its capacity as **Issuer Agent**, ATHEXCSD may receive the above files at SRDII_DSSOperators@athexgroup.gr or via FIN PLUS in ISO 20022 format and manage them in order to eventually update the AXIA e-SM platform for the holding of the electronic General Meeting.

3.1 ISO 20022 format files for shareholders' notice of participation in a General Meeting

3.1.1. ISO 20022 format file for shareholders' notice of participation in a General Meeting

In its capacity as CSD (Issuer & Investor CSD), ATHEXCSD, provided that the chain of intermediaries is used and in order to facilitate the exercise of the shareholder's rights, will receive from the intermediaries the already standardized ISO files/messages that comprise the shareholder's notice of participation in a General Meeting (which concern the submission of electronic votes, the appointment of a proxy, and a request for the recording and counting of votes) via email or via FIN PLUS in ISO 20022 format.

In addition, in its capacity as Issuer Agent, ATHEXCSD will receive via email or via FIN PLUS and in ISO 20022 format files that comprise the shareholders' notice of participation in a GM in order to obtain the electronic vote and shareholder proxy appointment information.
The format of ISO 20022 messages for the shareholders' notice of participation in a General Meeting, in accordance with the international market standards, will have the following format per example described below, with the following **key fields**, among others:
Unique identifier of the participation notice; message type; unique event identifier; ISIN code; method of participation; name of shareholder; name of proxy or other third party nominated

by the shareholder; unique identifier of the proxy or other third party nominated by the shareholder, item on the agenda; voting location and number of shares voted.

MeetingInstruction - seev.004.001.09

<u>**Example 1**</u>
This example describes a meeting instruction containing split vote instructions. To confirm the vote, a meeting instruction status message will be sent (see example in MeetingInstructionStatus chapter).
To confirm the actual execution of the instruction at the shareholders meeting a vote execution confirmation will be send (see example in MeetingVoteExecutionConfirmation chapter).
Terms
On 11 April, a fund manager (FUMAUS33) sends meeting instructions related to the Big Corp general meeting to a custodian (GLOBUS33). The custodian services the accounts of Fund ABC and Fund DEF.
The fund manager sends a split vote instruction for Fund ABC.
The following graphic shows the flow of messages described in this example.
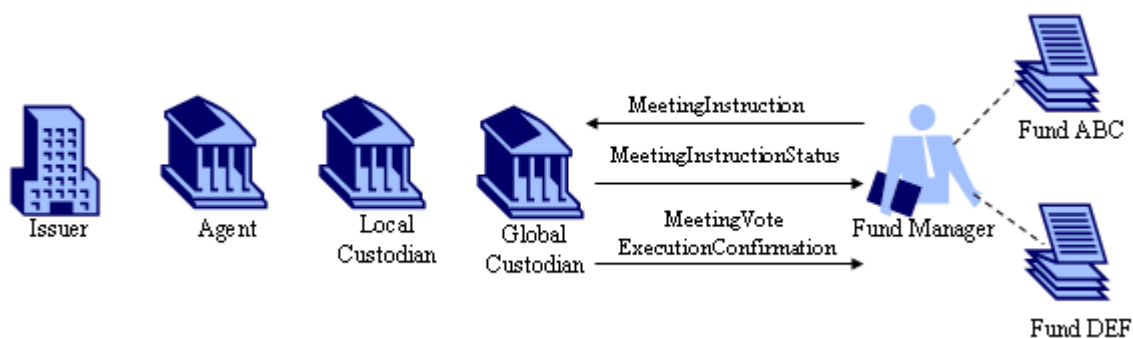
Message Instance

```
<MtgInstr>
        <MtgRef>
                <IssrMtgId>LS001</IssrMtgId>
                <MtgDtAndTm>2019-04-28T11:00:00</MtgDtAndTm>
                <Tp>GMET</Tp>
                <Lctn>
                        <AdrLine>Great Hall at Kensington Town Hall</AdrLine>
                        <StrtNm>Hornton Street</StrtNm>
                        <PstCd>W87NX</PstCd>
                        <TwnNm>London</TwnNm>
                        <Ctry>GB</Ctry>
                </Lctn>
        </MtgRef>
        <FinInstrmId>
                <ISIN>GB3333A53L22</ISIN>
        </FinInstrmId>
        <Instr>
                <SnglInstrId>ABC123</SnglInstrId>
                <VoteExctnConf>true</VoteExctnConf>
                <AcctDtls>
```

```
                              <AcctId>123456</AcctId>
                              <AcctOwnr>
                                      <LglPrsn>
                                              <NmAndAdr>
                                                      <Nm>FUND ABC</Nm>
                                                      <Adr>
                                                              <TwnNm>New
York</TwnNm>
                                                              <Ctry>US</Ctry>
                                                      </Adr>
                                              </NmAndAdr>
                                              <Id>
                                                      <AnyBIC>FUMCUS33</AnyBIC>
                                              </Id>
                                      </LglPrsn>
                              </AcctOwnr>
                              <InstdBal>
                                      <Bal>
                                              <ShrtLngPos>LONG</ShrtLngPos>
                                              <Qty>
                                                      <Unit>250</Unit>
                                              </Qty>
                                      </Bal>
                                      <BalTp>ELIG</BalTp>
                                      <SfkpgPlc>
                                              <Ctry>US</Ctry>
                                      </SfkpgPlc>
                              </InstdBal>
                      </AcctDtls>
                      <VoteDtls>
                              <VoteInstrForAgndRsltn>
                                      <VotePerAgndRsltn>
                                              <VoteInstr>
                                                      <IssrLabl>1</IssrLabl>
                                                      <For>
                                                              <Qty>
                                                                      <Unit>250</Unit>
                                                              </Qty>
                                                      </For>
                                              </VoteInstr>
                                              <VoteInstr>
                                                      <IssrLabl>2</IssrLabl>
                                                      <Agnst>
                                                              <Qty>
                                                                      <Unit>80</Unit>
                                                              </Qty>
                                                      </Agnst>
                                                      <Abstn>
                                                              <Qty>
                                                                      <Unit>170</Unit>
```

```
                                                    </Qty>
                                            </Abstn>
                                    </VoteInstr>
                                    <VoteInstr>
                                            <IssrLabl>3</IssrLabl>
                                            <For>
                                                    <Qty>
                                                            <Unit>170</Unit>
                                                    </Qty>

                                            </For>
                                            <Agnst>
                                                    <Qty>
                                                            <Unit>30</Unit>
                                                    </Qty>

                                            </Agnst>
                                            <Abstn>
                                                    <Qty>
                                                            <Unit>30</Unit>
                                                    </Qty>

                                            </Abstn>
                                    </VoteInstr>
                            </VotePerAgndRsltn>
                    </VoteInstrForAgndRsltn>
            </VoteDtls>
    </Instr>
</MtgInstr>
```

Example 2

The second example describes a meeting instruction containing a global vote instruction. To confirm the vote, a meeting instruction status message will be sent (see an example in MeetingInstructionStatus chapter).
As the Sender makes an error, he will try to cancel his instruction by sending a cancellation request (see example in MeetingInstructionCancellationRequest chapter).
The following graphic shows the flow of messages described in this example.
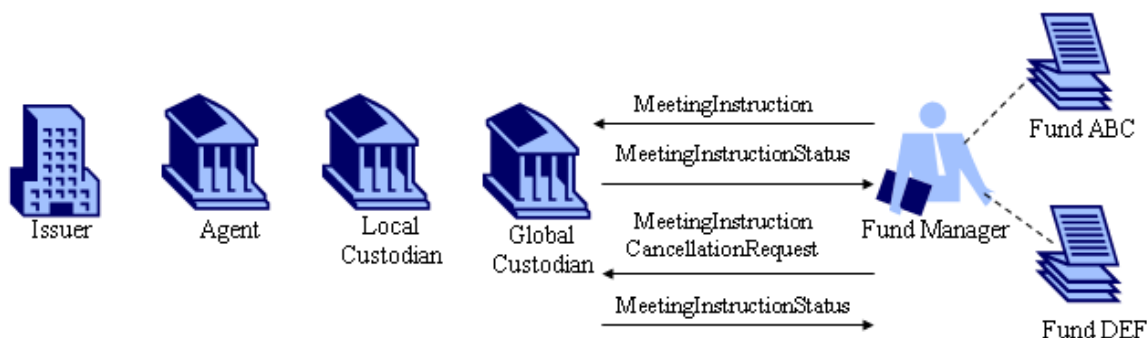
Terms

The fund manager (FUMAUS33) sends a global vote instruction (ie for the entirety of the eligible position) to the custodian (GLOBUS33) for the account of Fund DEF.

Message Instance

```
<MtgInstr>
        <MtgRef>
                <IssrMtgId>LS001</IssrMtgId>
                <MtgDtAndTm>2019-04-28T11:00:00</MtgDtAndTm>
                <Tp>GMET</Tp>
                <Lctn>
                        <AdrLine>Great Hall at Kensington Town Hall</AdrLine>
                        <StrtNm>Hornton Street</StrtNm>
                        <PstCd>W87NX</PstCd>
                        <TwnNm>London</TwnNm>
                        <Ctry>GB</Ctry>
                </Lctn>
        </MtgRef>
        <FinInstrmId>
                <ISIN>GB3333A53L22</ISIN>
        </FinInstrmId>
        <Instr>
                <SnglInstrId>DEF456</SnglInstrId>
                <VoteExctnConf>true</VoteExctnConf>
                <AcctDtls>
                        <AcctId>654321</AcctId>
                        <AcctOwnr>
                                <LglPrsn>
                                        <NmAndAdr>
                                                <Nm>FUND DEF</Nm>
                                                <Adr>
                                                        <TwnNm>Boston</TwnNm>
                                                        <Ctry>US</Ctry>
                                                </Adr>
                                        </NmAndAdr>
                                        <Id>
                                                <AnyBIC>FUNDUS33</AnyBIC>
                                        </Id>
                                </LglPrsn>
                        </AcctOwnr>
                        <InstdBal>
                                <Bal>
                                        <ShrtLngPos>LONG</ShrtLngPos>
                                        <Qty>
                                                <Unit>800</Unit>
                                        </Qty>
                                </Bal>
                                <BalTp>ELIG</BalTp>
                                <SfkpgPlc>
                                        <Ctry>US</Ctry>
                                </SfkpgPlc>
```

```
                                        </InstdBal>
                                    </AcctDtls>
                                    <VoteDtls>
                                            <VoteInstrForAgndRsltn>
                                                    <VotePerAgndRsltn>
                                                            <GblVoteInstr>
                                                                    <IssrLabl>1</IssrLabl>
                                                                    <VoteOptn>
                                                                            <Tp>CFOR</Tp>
                                                                    </VoteOptn>
                                                            </GblVoteInstr>
                                                            <GblVoteInstr>
                                                                    <IssrLabl>2</IssrLabl>
                                                                    <VoteOptn>
                                                                            <Tp>CAGS</Tp>
                                                                    </VoteOptn>
                                                            </GblVoteInstr>
                                                            <GblVoteInstr>
                                                                    <IssrLabl>3</IssrLabl>
                                                                    <VoteOptn>
                                                                            <Tp>CFOR</Tp>
                                                                    </VoteOptn>
                                                            </GblVoteInstr>
                                                    </VotePerAgndRsltn>
                                            </VoteInstrForAgndRsltn>
                                    </VoteDtls>
                            </Instr>
                    </MtgInstr>
```

Example 3
This third example describes how to use the meeting instruction message for the
appointment of a proxy person.

Terms
The fund manager (FUMAUS33), which also manages Fund XYZ, sends a meeting instruction
message to the custodian (GLOBUS33) advising that a proxy person has been assigned to
attend the meeting on behalf of Fund XYZ. The proxy person will pick up the attendance card
at the entrance of the meeting.
The following graphic shows the flow of messages described in this example.

Message Instance

```
<MtgInstr>
    <MtgRef>
        <IssrMtgId>LS001</IssrMtgId>
        <MtgDtAndTm>2019-04-28T11:00:00</MtgDtAndTm>
        <Tp>GMET</Tp>
        <Lctn>
            <AdrLine>Great Hall at Kensington Town Hall</AdrLine>
            <StrtNm>Hornton Street</StrtNm>
            <PstCd>W87NX</PstCd>
            <TwnNm>London</TwnNm>
            <Ctry>GB</Ctry>
        </Lctn>
    </MtgRef>
    <FinInstrmId>
        <ISIN>GB3333A53L22</ISIN>
    </FinInstrmId>
    <Instr>
        <SnglInstrId>XYZ852</SnglInstrId>
        <VoteExctnConf>true</VoteExctnConf>
        <AcctDtls>
            <AcctId>852963</AcctId>
            <AcctOwnr>
                <LglPrsn>
                    <NmAndAdr>
                        <Nm>FUND XYZ</Nm>
                        <Adr>
                            <TwnNm>Philadelphia</TwnNm>
                            <Ctry>US</Ctry>
                        </Adr>
                    </NmAndAdr>
                    <Id>
                        <AnyBIC>FUNXUS33</AnyBIC>
                    </Id>
```

```
                        </LglPrsn>
                </AcctOwnr>
                <InstdBal>
                        <Bal>
                                <ShrtLngPos>LONG</ShrtLngPos>
                                <Qty>
                                        <Cd>QALL</Cd>
                                </Qty>
                        </Bal>
                </InstdBal>
        </AcctDtls>
        <Prxy>
                <PrxyTp>DISC</PrxyTp>
                <PrsnDtls>
                        <PrssgndPrxy>
                                <NtrlPrsn>
                                        <NmAndAdr>
                                                <FrstNm>John</FrstNm>
                                                <Srnm>Smith</Srnm>
                                        </NmAndAdr>
                                        <Id>
                                                <Id>564789GB</Id>
                                                <IdTp>
                                                        <Cd>CCPT</Cd>
                                                </IdTp>
                                        </Id>
                                </NtrlPrsn>
                        </PrssgndPrxy>
                        <EmplngPty>
                                <AnyBIC>PROXGB2L</AnyBIC>
                        </EmplngPty>
                        <AttndncCardDtls>
                                <DlvryMtd>ENTR</DlvryMtd>
                        </AttndncCardDtls>
                </PrsnDtls>
        </Prxy>
        <VoteDtls>
                <VoteInstrForAgndRsltn>
                        <VotePerAgndRsltn>
                                <GblVoteInstr>
                                        <IssrLabl>1</IssrLabl>
                                        <VoteOptn>
                                                <Tp>DISC</Tp>
                                        </VoteOptn>
                                </GblVoteInstr>
                                <GblVoteInstr>
                                        <IssrLabl>2</IssrLabl>
                                        <VoteOptn>
                                                <Tp>DISC</Tp>
                                        </VoteOptn>
```

```
                                        </GblVoteInstr>
                                        <GblVoteInstr>
                                                <IssrLabl>3</IssrLabl>
                                                <VoteOptn>
                                                        <Tp>DISC</Tp>
                                                </VoteOptn>
                                        </GblVoteInstr>
                                </VotePerAgndRsltn>
                        </VoteInstrForAgndRsltn>
                </VoteDtls>
        </Instr>
</MtgInstr>
```

3.1.2 ISO 20022 format file for the cancellation of the notice of shareholders' participation in a General Meeting

In the event that an Intermediary wants to cancel the notice of shareholders' participation in a General Meeting, then it should send the relevant ISO 20022 format message for cancellation by email or via FIN PLUS.
The format of the ISO 20022 messages for the cancellation of the shareholders' notice of participation in a General Meeting, in accordance with the international market standards, will have the following format per example described below,
with the following **key areas**, among others:
Unique identifier of the participation notice; message type; unique event identifier; ISIN code; method of participation; name of shareholder; name of proxy or other third party nominated by the shareholder; unique identifier of the proxy or other third party nominated by the shareholder, item on the agenda; voting location and number of shares voted.

**MeetingInstructionCancellationRequest - seev.005.001.09**
Terms
A fund manager (FUMAUS33) sent a vote instruction to a custodian (GLOBUS33) for the account of Fund DEF.
As the sender made an error, a MeetingInstructionCancellationRequest is sent to cancel the previous instruction (see example 2 in MeetingInstruction chapter).
The cancellation must be accepted or rejected through a MeetingInstructionStatus message (see MeetingInstructionStatus chapter), before a new meeting instruction can be sent.
The following graphic shows the flow of messages described in this example.
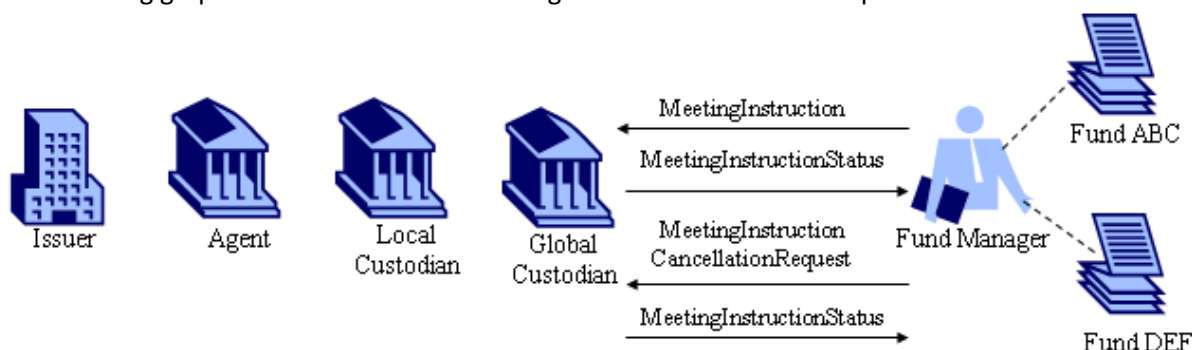
Message Instance

```
<MtgInstrCxlReq>
        <MtgInstrId>I002</MtgInstrId>
        <MtgRef>
                <IssrMtgId>LS001</IssrMtgId>
                <MtgDtAndTm>2019-04-28T11:00:00</MtgDtAndTm>
                <Tp>GMET</Tp>
        </MtgRef>
        <FinInstrmId>
                <ISIN>GB3333A53L22</ISIN>
        </FinInstrmId>
        <ToBeCancInstr>
                <SnglInstrId>DEF456</SnglInstrId>
        </ToBeCancInstr>
</MtgInstrCxlReq>
```

3.1.3 ISO 20022 format file for the status of the shareholders' notice of participation in a General Meeting

In the event that an Intermediary forwards a shareholders' notice of participation in a General Meeting (seev.004.001.09) or cancellation thereof (seev.005.001.09), then **it will receive in response** an ISO 20022 format message indicating the **status of the relevant information transmission, i.e. whether it was accepted or rejected by the Issuer or its Issuer Agent**.

The format of the ISO 20022 messages for the status of the shareholders' notice of participation in a General Meeting, in accordance with the international market standards, will have the following format per example described below:

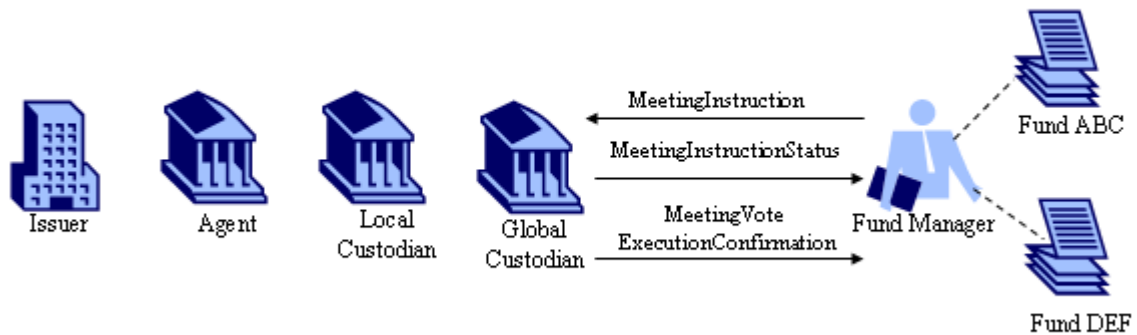**MeetingInstructionStatus - seev.006.001.09**

<u>Example 1</u>
This example describes how the meeting instruction status message is used to confirm the processing or rejection status of a meeting instruction message.

Terms
A fund manager (FUMAUS33) sent on 11 April a split voting instruction related to the Big Corp general meeting to a custodian (GLOBUS33) on behalf of Fund ABC. The custodian uses the meeting instruction status message to confirm the acceptance and forwarding along the chain of this instruction for the Fund ABC account.
The following graphic shows the flow of messages described in this example:

Message Instance

```
<MtgInstrSts>
        <InstrTp>
                <InstrId>I001</InstrId>
        </InstrTp>
        <MtgRef>
                <IssrMtgId>LS001</IssrMtgId>
                <MtgDtAndTm>2019-04-28T11:00:00</MtgDtAndTm>
                <Tp>GMET</Tp>
                <Lctn>
                        <AdrLine>Great Hall at Kensington Town Hall</AdrLine>
                        <StrtNm>Hornton Street</StrtNm>
                        <PstCd>W87NX</PstCd>
                        <TwnNm>London</TwnNm>
                        <Ctry>GB</Ctry>
                </Lctn>
        </MtgRef>
        <FinInstrmId>
                <ISIN>GB3333A53L22</ISIN>
        </FinInstrmId>
        <InstrTpSts>
                <InstrSts>
                        <DtldInstrSts>
                                <SnglInstrId>ABC123</SnglInstrId>
                                <AcctId>123456</AcctId>
                                <InstrSts>
                                        <PrcgSts>
                                                <Sts>FRWD</Sts>
                                        </PrcgSts>
                                </InstrSts>
                        </DtldInstrSts>
                </InstrSts>
        </InstrTpSts>
```

```
                          <CnfrmgPty>
                  <LglPrsn>
                          <NmAndAdr>
                                  <Nm>Global Custodian PLC</Nm>
                          </NmAndAdr>
                          <Id>
                                  <AnyBIC>GLOBUS33</AnyBIC>
                          </Id>
                  </LglPrsn>
          </CnfrmgPty>
          <VoteCstgPty>
                  <LglPrsn>
                          <NmAndAdr>
                                  <Nm>FUND XYZ</Nm>
                          </NmAndAdr>
                          <Id>
                                  <AnyBIC>FUMAUS33</AnyBIC>
                          </Id>
                  </LglPrsn>
          </VoteCstgPty>
  </MtgInstrSts>
```
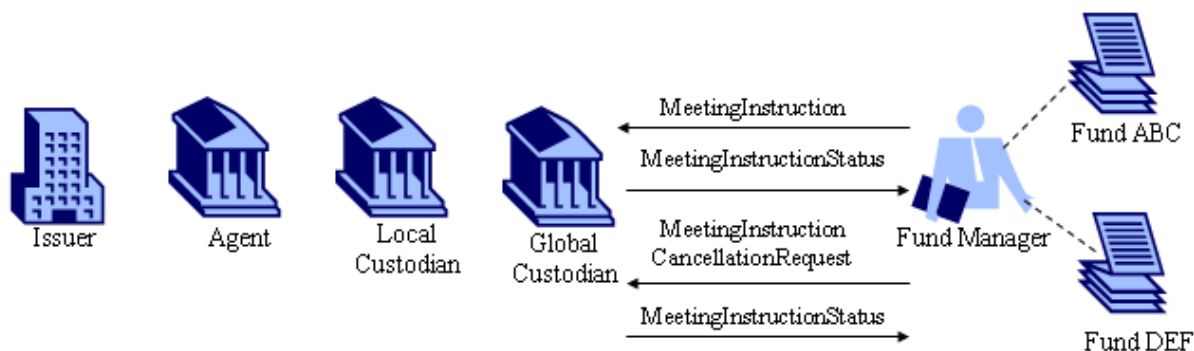
Example 2

The second example describes how the meeting instruction status message is used to confirm the cancellation of a meeting instruction message.

Terms

A fund manager (FUMAUS33) sent a vote instruction to a custodian (GLOBUS33) for the account of Fund DEF.

As the Sender made an error, a MeetingInstructionCancellationRequest was sent to cancel the previous instruction (see example in MeetingInstruction chapter).

The custodian confirms the cancellation via a MeetingInstructionStatus message.

The following graphic shows the flow of messages described in this example.

Message Instance

```
  <MtgInstrSts>
```

```
<InstrTp>
        <InstrCxlId>I004</InstrCxlId>
</InstrTp>
<MtgRef>
        <IssrMtgId>LS001</IssrMtgId>
        <MtgDtAndTm>2019-04-28T11:00:00</MtgDtAndTm>
        <Tp>GMET</Tp>
        <Lctn>
                <AdrLine>Great Hall at Kensington Town Hall</AdrLine>
                <StrtNm>Hornton Street</StrtNm>
                <PstCd>W87NX</PstCd>
                <TwnNm>London</TwnNm>
                <Ctry>GB</Ctry>
        </Lctn>
</MtgRef>
<FinInstrmId>
        <ISIN>GB3333A53L22</ISIN>
</FinInstrmId>
<InstrTpSts>
        <CxlSts>
                <GblCxlSts>
                        <PrcgSts>
                                <Sts>CAND</Sts>
                        </PrcgSts>
                </GblCxlSts>
        </CxlSts>
</InstrTpSts>
<CnfrmgPty>
        <LglPrsn>
                <NmAndAdr>
                        <Nm>Global Custodian PLC</Nm>
                </NmAndAdr>
                <Id>
                        <AnyBIC>GLOBUS33</AnyBIC>
                </Id>
        </LglPrsn>
</CnfrmgPty>
<VoteCstgPty>
        <LglPrsn>
                <NmAndAdr>
                        <Nm>FUND XYZ</Nm>
                </NmAndAdr>
                <Id>
                        <AnyBIC>FUMAUS33</AnyBIC>
                </Id>
        </LglPrsn>
</VoteCstgPty>
</MtgInstrSts>
```

3.2 ISO 20022 format files for the confirmation of entitlement to exercise shareholder's rights

n its capacity as CSD (Issuer & Investor CSD), ATHEXCSD, provided that the chain of intermediaries is used and in order to facilitate the exercise of the shareholder's rights, will receive from the intermediaries the already standardized ISO format files/messages that comprise the confirmation of entitlement to exercise shareholder's rights, upon the relevant indication of the shareholder.

In addition, in its capacity as Issuer Agent, ATHEXCSD will receive via email or FIN PLUS and subsequently via the AXIA platform (upon notifying the Participants) files that comprise the confirmation of entitlement to exercise shareholder's rights from the shareholder's intermediary at the shareholder's request, in order to facilitate the shareholder to request their identification (if not prior to the General Meeting) and subsequently to be able to vote at the General Meeting.

The format of ISO 20022 messages for the confirmation of entitlement or exercise shareholder's rights, in accordance with the international market standards, will have the following format per example described below:

MeetingEntitlementNotification - seev.003.001.09

Terms
Global custodian (GLOBUS33) services the account of Fund XYZ (FUMAUS33). On 25 April, the record date for the Big Corp general meeting, the local custodian confirms to the global custodian the entitlement for Fund XYZ.
The following graphic shows the flow of the message as described in this example.
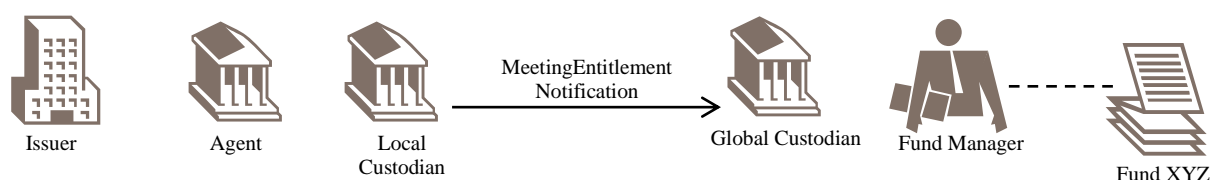
Message Instance

```
<MtgEntitlmntNtfctn>
        <NtfctnTp>NEWM</NtfctnTp>
        <MtgRef>
                <IssrMtgId>LS001</IssrMtgId>
                <MtgDtAndTm>2019-04-28T11:00:00</MtgDtAndTm>
                <Tp>GMET</Tp>
                <Clssfctn>
                        <Cd>AMET</Cd>
                </Clssfctn>
                <Lctn>
                        <AdrLine>Great Hall at Kensington Town Hall</AdrLine>
                        <StrtNm>Hornton Street</StrtNm>
                        <PstCd>W87NX</PstCd>
                        <TwnNm>London</TwnNm>
```

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```
                    <Ctry>GB</Ctry>
                </Lctn>
        </MtgRef>
        <Issr>
                <NmAndAdr>
                        <Nm>Big Corp PLC</Nm>
                </NmAndAdr>
        </Issr>
        <Scty>
                <FinInstrmId>
                        <ISIN>GB3333A53L22</ISIN>
                </FinInstrmId>
                <Pos>
                        <AcctId>852963</AcctId>
                        <AcctOwnr>
                                <Id>
                                        <LglPrsn>
                                                <NmAndAdr>
                                                        <Nm>Fund XYZ</Nm>
                                                </NmAndAdr>
                                                <Id>
                                                        <AnyBIC>FUMAUS33</AnyBIC>
                                                </Id>
                                        </LglPrsn>
                                </Id>
                                <AddtlIdInf>
                                        <RegnId>
                                                <RegnNb>87683789812</RegnNb>
                                        </RegnId>
                                </AddtlIdInf>
                        </AcctOwnr>
                        <HldgBal>
                                <Bal>
                                        <Unit>625</Unit>
                                </Bal>
                                <BalTp>ELIG</BalTp>
                                <SfkpgPlc>
                                        <Ctry>GB</Ctry>
                                </SfkpgPlc>
                        </HldgBal>
                </Pos>
        </Scty>
        <Elgblty>
                <EntitlmntFxgDt>2007-04-25</EntitlmntFxgDt>
        </Elgblty>
</MtgEntitlmntNtfctn>
```

4. SENDING OF ISO 20022 SI DISCLOSURE MESSAGES IN RESPONSE TO AN IDENTIFICATION REQUEST FROM INTERMEDIARIES TO ISSUERS / ISSUER AGENTS

Upon receipt of a shareholder identification request from an Issuer or its Issuer Agent, through its chain of intermediaries or directly, each intermediary must **disclose the shareholder identification information to an omnibus account** – no later than the course of the business day immediately following the record date or the date of receipt of the request by the intermediary providing the response, whichever is later – **directly to the legal entity identified within the identification request**.

In the event that **ATHEXCSD is the Issuer Agent**, the Intermediary will be able to connect with ATHEXCSD via FIN PLUS in order to exchange ISO 20022 format messages for shareholder identification. Alternatively, it may send the response to an identification request in ISO 20022 (xml) format via email to si_responses@athexgroup.gr.

4.1 Response to a shareholder identification request by Intermediaries to ATHEXCSD in its capacity as ISSUER AGENT

The **ISO 20022** format message **of the SI Disclosure as a response to a shareholder identification request** will have the following format according to the example described below:

ShareholdersIdentificationDisclosureResponse - seev.047.001.02
Example 1: Scenario Description
On the 3rd of November, the intermediary (INTAFRPP666) sends the shareholder information to the disclosure response recipient (RECPBEBBZZZ) providing the identification and holdings of 4 different account holders.

Message Instance (with application header)

```
<AppHdr xmlns="urn:iso:std:iso:20022:tech:xsd:head.001.001.02"
xmlns:n1="http://www.w3.org/2000/09/xmldsig#">
    <Fr>
        <FIId>
            <FinInstnId>
                <BICFI>INTAFRPP666</BICFI>
            </FinInstnId>
        </FIId>
    </Fr>
    <To>
        <FIId>
            <FinInstnId>
                <BICFI>RECPBEBBZZZ</BICFI>
            </FinInstnId>
        </FIId>
    </To>
```

```
            <BizMsgIdr>INTAFR000000001</BizMsgIdr>
            <MsgDefIdr>seev.047.001.02</MsgDefIdr>
            <CreDt>2019-10-15T15:30:00Z</CreDt>
</AppHdr>
<Document xmlns="urn:iso:std:iso:20022:tech:xsd:seev.047.001.02"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">
        <ShrhldrsIdDsclsrRspn>
            <IssrDsclsrReqRef>
                <IssrDsclsrReqId>ISUA-DISCL-2019-0001</IssrDsclsrReqId>
                <FinInstrmId>
                    <ISIN>BE7876543087</ISIN>
                </FinInstrmId>
                <ShrhldrsDsclsrRcrdDt>
                    <Dt>
                        <Dt>2019-10-30</Dt>
                    </Dt>
                </ShrhldrsDsclsrRcrdDt>
            </IssrDsclsrReqRef>
            <DsclsrRspnId>DISCLRESP0006</DsclsrRspnId>
            <RspndgIntrmy>
                <NmAndAdr>
                    <Nm>LocalCustody Inc.</Nm>
                    <Adr>
                        <AdrTp>ADDR</AdrTp>
                        <StrtNm>B Street</StrtNm>
                        <BldgNb>3</BldgNb>
                        <PstCd>1310</PstCd>
                        <TwnNm>La Hulpe</TwnNm>
                        <Ctry>BE</Ctry>
                    </Adr>
                </NmAndAdr>
                <Id>
                    <LEI>LOALCUST8H675398AM77</LEI>
                </Id>
                <CtctPrsn>
                    <NmPrfx>MADM</NmPrfx>
                    <GvnNm>Jane</GvnNm>
                    <Nm>Smith</Nm>
                    <PhneNb>+32-(010)1764300</PhneNb>
                    <EmailAdr>jane.smith@globalCustody.com</EmailAdr>
                </CtctPrsn>
```

```
        </RspndgIntrmy>
        <DsclsrInf>
            <SfkpgAcctAndHldgs>
                <SfkpgAcct>BE0128754</SfkpgAcct>
                <AcctSvcr>
                    <AnyBIC>LOCABE33XXX</AnyBIC>
                </AcctSvcr>
                <ShrhldgBalOnOwnAcct>
                    <Unit>100321</Unit>
                </ShrhldgBalOnOwnAcct>
                <ShrhldgBalOnClntAcct>
                    <Unit>400210</Unit>
                </ShrhldgBalOnClntAcct>
                <TtlShrhldgBal>
                    <Unit>500531</Unit>
                </TtlShrhldgBal>
                <AcctSubLvl>
                <BlwThrshldShrhldgQty>
                <Unit>0</Unit>
                </BlwThrshldShrhldgQty>
                <Dsclsr>
                    <SfkpgAcct>A0001</SfkpgAcct>
                    <AcctHldr>
                        <LglPrsn>
                            <NmAndAdr>
                                <Nm>ABC Inc.</Nm>
                                <Adr>
                                    <AdrTp>ADDR</AdrTp>
                                    <StrtNm>One Street</StrtNm>
                                    <BldgNb>38</BldgNb>
                                    <PstCd>1234</PstCd>
                                    <TwnNm>City</TwnNm>
                                    <Ctry>NL</Ctry>
                                </Adr>
                            </NmAndAdr>
                            <EmailAdr>info@abcinc.com</EmailAdr>
                            <Id>
                                <NtlRegnNb>NL764098</NtlRegnNb>
                            </Id>
                            <CtryOfIncorprtn>NL</CtryOfIncorprtn>
                            <Ownrsh>
```

```xml
                        <OwnrshTp>
                            <Cd>OWNR</Cd>
                        </OwnrshTp>
                    </Ownrsh>
                </LglPrsn>
            </AcctHldr>
            <ShrhldgBal>
                <ShrhldgTp>NOMI</ShrhldgTp>
                <Qty>
                <Unit>200000</Unit>
                </Qty>
                <InitlDtOfShrhldg>
                    <Dt>2017-08-13</Dt>
                </InitlDtOfShrhldg>
            </ShrhldgBal>
        </Dsclsr>
        <Dsclsr>
            <SfkpgAcct>A0002</SfkpgAcct>
            <AcctHldr>
                <LglPrsn>
                    <NmAndAdr>
                        <Nm>Brokerage Inc.</Nm>
                    </NmAndAdr>
                    <EmailAdr>info@Brokerage.com</EmailAdr>
                    <Id>
                        <NtlRegnNb>LU847801</NtlRegnNb>
                    </Id>
                    <CtryOfIncorprtn>LU</CtryOfIncorprtn>
                    <Ownrsh>
                        <OwnrshTp>
                            <Cd>OWNR</Cd>
                        </OwnrshTp>
                    </Ownrsh>
                </LglPrsn>
            </AcctHldr>
            <ShrhldgBal>
                <ShrhldgTp>NOMI</ShrhldgTp>
                <Qty>
                <Unit>100000</Unit>
                </Qty>
                <InitlDtOfShrhldg>
```

```
                <Dt>2015-02-09</Dt>
            </InitlDtOfShrhldg>
        </ShrhldgBal>
    </Dsclsr>
    <Dsclsr>
        <SfkpgAcct>A0003</SfkpgAcct>
        <AcctHldr>
            <LglPrsn>
                <NmAndAdr>
                    <Nm>LocalCustody Inc.</Nm>
                </NmAndAdr>
                <EmailAdr>info@LocalCustody.com</EmailAdr>
                <Id>
                    <NtlRegnNb>BE85432</NtlRegnNb>
                </Id>
                <CtryOfIncorprtn>BE</CtryOfIncorprtn>
                <Ownrsh>
                    <OwnrshTp>
                        <Cd>OWNR</Cd>
                    </OwnrshTp>
                </Ownrsh>
            </LglPrsn>
        </AcctHldr>
        <ShrhldgBal>
            <ShrhldgTp>OOAC</ShrhldgTp>
            <Qty>
            <Unit>100321</Unit>
            </Qty>
            <InitlDtOfShrhldg>
                <Dt>2013-01-29</Dt>
            </InitlDtOfShrhldg>
        </ShrhldgBal>
    </Dsclsr>
    <Dsclsr>
        <SfkpgAcct>A0004</SfkpgAcct>
        <AcctHldr>
            <NtrlPrsn>
                <NmAndAdr>
                    <NmPrfx>MADM</NmPrfx>
                    <FrstNm>Bea</FrstNm>
                    <Srnm>Winner</Srnm>
```

```xml
            </NmAndAdr>
            <Id>
                <Id>594-7653297-18</Id>
                <IdTp>
                    <Cd>IDCD</Cd>
                </IdTp>
            </Id>
            <Ntlty>NZ</Ntlty>
            <DtAndPlcOfBirth>
                <BirthDt>1961-05-09</BirthDt>
                <CityOfBirth>Christchurch</CityOfBirth>
                <CtryOfBirth>NZ</CtryOfBirth>
            </DtAndPlcOfBirth>
            <InvstrTp>
                <Cd>RETL</Cd>
            </InvstrTp>
            <Ownrsh>
                <OwnrshTp>
                    <Cd>USUF</Cd>
                </OwnrshTp>
                <UsfrctPctg>100</UsfrctPctg>
            </Ownrsh>
        </NtrlPrsn>
    </AcctHldr>
    <ShrhldgBal>
        <ShrhldgTp>OOAC</ShrhldgTp>
        <Qty>
        <Unit>50210</Unit>
        </Qty>
        <InitlDtOfShrhldg>
            <Dt>2010-11-09</Dt>
        </InitlDtOfShrhldg>
    </ShrhldgBal>
    <ShrhldgBal>
        <ShrhldgTp>OOAC</ShrhldgTp>
        <Qty>
        <Unit>50000</Unit>
        </Qty>
        <InitlDtOfShrhldg>
            <Dt>2011-12-03</Dt>
        </InitlDtOfShrhldg>
```

```
            </ShrhldgBal>
         </Dsclsr>
         </AcctSubLvl>
      </SfkpgAcctAndHldgs>
      </DsclsrInf>
</ShrhldrsIdDsclsrRspn>
```

4.2 Cancellation of SI Disclosure as a response to a shareholder identification request from Intermediaries to ATHEXCSD in its capacity as ISSUER AGENT

The ISO 20022 format message of the **cancellation of an SI Disclosure**, in accordance with the international market standards, will have the following format according to this example:

ShareholderIdentificationDisclosureResponseCancellationAdvice - seev.048.001.01

Example 1: Scenario Description
On the 4th of November, the intermediary (INTAFRPP666) realises that some of the information provided to the disclosure response recipient on the 3rd of November were not fully correct and therefore sends a shareholder Identification disclosure response cancellation advice message to the disclosure response recipient (RECPBEBBZZZ) so as inform the disclosure response recipient that the information must be disregarded.

Message Instance (with application header)

```
<AppHdr xmlns="urn:iso:std:iso:20022:tech:xsd:head.001.001.02"
xmlns:n1="http://www.w3.org/2000/09/xmldsig#">
   <Fr>
      <FIId>
         <FinInstnId>
            <BICFI>INTAFRPP666</BICFI>
         </FinInstnId>
      </FIId>
   </Fr>
   <To>
      <FIId>
         <FinInstnId>
            <BICFI>RECPBEBBZZZ</BICFI>
         </FinInstnId>
      </FIId>
   </To>
   <BizMsgIdr>INTAFR000000001</BizMsgIdr>
   <MsgDefIdr>seev.048.001.01</MsgDefIdr>
   <CreDt>2019-11-04T09:30:00Z</CreDt>
```

```
</AppHdr>
<Document xmlns="urn:iso:std:iso:20022:tech:xsd:seev.048.001.01"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">
    <ShrhldrIdDsclsrRspnCxlAdvc>
        <DsclsrRspnId>DISCLRESP0006</DsclsrRspnId>
        <IssrDsclsrReqRef>
            <IssrDsclsrReqId>ISUA-DISCL-2019-0001</IssrDsclsrReqId>
            <FinInstrmId>
                <ISIN>BE7876543087</ISIN>
            </FinInstrmId>
            <ShrhldrsDsclsrRcrdDt>
                <Dt>
                    <Dt>2019-10-30</Dt>
                </Dt>
            </ShrhldrsDsclsrRcrdDt>
        </IssrDsclsrReqRef>
        <RspndgIntrmy>
            <Nm>LocalCustody Inc.</Nm>
            <Id>
                <LEI>LOALCUST8H675398AM77</LEI>
            </Id>
        </RspndgIntrmy>
    </ShrhldrIdDsclsrRspnCxlAdvc>
</Document>
```

4.3 Status of response to a shareholder identification request from Intermediaries to ATHEXCSD in its capacity as ISSUER AGENT

In the event that an Intermediary sends an SI Disclosure message as a response to a shareholder identification request, then **it will receive in response** an ISO 20022 format message in indicating the **status of the response message**, i.e. whether it has been accepted or rejected.

The format of the **ISO 20022** messages **for the status of the SI Disclosure as a response to a shareholder identification request,** in accordance with the international market standards will have the following format according to the example described below:

ShareholderIdentificationDisclosureResponseStatusAdvice - seev.049.001.01

Example 1: Scenario Description
On the 3rd of November, the disclosure response recipient (RECPBEBBZZZ) having receive the shareholder identification disclosure response message from the intermediary (INTAFRPP666), the disclosure recipient sends a disclosure response status advice to the intermediary to advise that the response message has been accepted.

Message Instance (with application header)

```
<AppHdr xmlns="urn:iso:std:iso:20022:tech:xsd:head.001.001.02"
xmlns:n1="http://www.w3.org/2000/09/xmldsig#">
    <Fr>
        <FIId>
            <FinInstnId>
                <BICFI>RECPBEBBZZZ </BICFI>
            </FinInstnId>
        </FIId>
    </Fr>
    <To>
        <FIId>
            <FinInstnId>
                <BICFI> INTAFRPP666 </BICFI>
            </FinInstnId>
        </FIId>
    </To>
    <BizMsgIdr>RECPBE000000001</BizMsgIdr>
    <MsgDefIdr>seev.049.001.01</MsgDefIdr>
    <CreDt>2019-11-03T017:00:00Z</CreDt>
</AppHdr>
<Document xmlns="urn:iso:std:iso:20022:tech:xsd:seev.049.001.01"
xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">
    <ShrhldrIdDsclsrRspnStsAdvc>
        <DsclsrRspnId>a</DsclsrRspnId>
        <IssrDsclsrReqRef>
            <IssrDsclsrReqId>ISUA-DISCL-2019-0001</IssrDsclsrReqId>
            <FinInstrmId>
                <ISIN>BE7876543087</ISIN>
            </FinInstrmId>
            <ShrhldrsDsclsrRcrdDt>
                <Dt>
                    <Dt>2019-10-30</Dt>
                </Dt>
            </ShrhldrsDsclsrRcrdDt>
        </IssrDsclsrReqRef>
        <RspndgIntrmy>
            <Nm>LocalCustody Inc.</Nm>
            <Id>
                <LEI>LOALCUST8H675398AM77</LEI>
            </Id>
```

```
        </RspndgIntrmy>
        <RspnRcptnSts>
            <Accptd>
                <NoSpcfdRsn>NORE</NoSpcfdRsn>
            </Accptd>
        </RspnRcptnSts>
    </ShrhldrIdDsclsrRspnStsAdvc>
</Document>
```

For each seev.047 SI Disclosure message to an identification request received by ATHEXCSD from an intermediary, a response with the status of the seev.049 message will be sent. The status will be sent for all SI Disclosure messages to an identification request for which an RMA key exchange with ATHEXCSD has taken place, in the following three steps:

a. upon receipt of the seev.047 file: in case the message mentions an unknown disclosure request identification, a seev.049 message with reason code **IDRI** is immediately sent back**.**
b. at the end of each processing cycle (reconciliation): a seev.049 message is sent back only for failed responses, based on the following table of error codes.
c. When finalizing the check: seev.049 responses are sent for all files accepted and for all files rejected.

With the exception of the case under (a), where ATHEXCSD sends a message with a code standardized by ISO 20022 standards, in all other cases it sends a message with a code standardized by ATHEXCSD (Proprietary).

In the following example, the error code is displayed with issuer HCSDGRAA, schema SIDERRORCODES1 and with a message in AddtlRsnInf., e.g.

```
        <RspnRcptnSts>
            <Rjctd>
             <Rsn>
              <RsnCd>
               <Prtry>
                <Id>E013</Id>
                <Issr>HCSDGRAA</Issr>
                <SchmeNm> SIDERRORCODES1 </SchmeNm>
               </Prtry>
              </RsnCd>
                <AddtlRsnInf>Disclosure   Request   is closed, no   more   responses   are
        accepted. Received date: 2021-05-15</AddtlRsnInf>
             </Rsn>
            </Rjctd>
        </RspnRcptnSts>
```

Below is the table with title "HELLENIC CENTRAL SECURITIES DEPOSITORY seev049 Proprietary reject reason error codes" with the error messages from ATHEXCSD to the intermediaries regarding their responses to identification requests (seev.047):

049 Code	MESSAGE
E001	Invalid XML: %P1
E002	Duplicate submission or page ISSRDSCLSRREQID:%P1 , RSPNDGINTRMY: %P2 , DSCLSRRSPNID %P3, pageNb %P4
IDRI	Disclosure request identification is invalid or unknown (IDRI). IssrDsclsrReqId: %P1
E004	ShareholdingBalanceOnOwnAccount is different from the sum of the Disclosure balances of type OOAC. Safekeeping account: %P1 - Account Holder Own amount :%P2 , Disclosure Own amount: %P2
E005	ShareholdingBalanceOnClntAccount is different from the sum of the Disclosure balances of type not OOAC. Safekeeping account: %P1 - Account Holder amount:%P2 , Disclosure amount: %P2
E006	Disclosure Safekeeping Account used multiple times for the same SEEV047 message. Safekeeping account: %P1 used multiple times in %P2
E007	Sender is not the Responding Intermediary or one of its agents. Sender: %P1, Responding Intermediary: %P2
E008	Unknown Sender. Responding Intermediary:%P1 dest address: %P2, destination user: %P3
E009	Responding Intermediary needs due diligence. %P1
E010	Unsupported message identifier: %P1
E011	Safekeeping Account is analyzed in another message. Safekeeping Account: %P1
E012	Disclosure Safekeeping Account is referred in another message. Safekeeping Account: %P1
E013	Disclosure Request is closed, no more responses are accepted. Received date: %P1

A.   ANNEX A

ISO 20022 seev.004, seev.005, seev.006, seev.007 message support instructions

1. Introduction

ATHEXGROUP's AXIA e-Shareholders Meeting (AXIA e-SM) platform, in the framework of the European SRD II Directive, supports a set of ISO 20022 messages sent to and received from the Participants:

- MeetingInstruction (MEIN) seev.004.001.09
- MeetingInstructionCancellationRequest (MEIC) seev.005.001.09
- MeetingInstructionStatus (MEIS) seev.006.001.09
- MeetingVoteExecutionConfirmation (MECO) seev.007.001.09

This section displays how the above mentioned messages will be used, clarifies the terms and describes how the messages will be supported by ATHEXCSD.

2. General description / assumptions

- The seev.004 messages, according to section "1. Introduction", are sent by parties entitled to vote to intermediaries, issuers or their agents, to ask the recipient of the message to act on a set of instructions[1].
- The AXIA e-SM platform, when ATHEXCSD acts as an Issuer Agent, will receive seev.004 messages in ISO 20022 xml format via the SWIFT channel.
- Messages received will always be from an Intermediary (with whom ATHEXCSD will have exchanged RMAs) on behalf of a Rightsholder.
- Messages on behalf of a Rightsholder can only be received by the first or last intermediary in the account (see Annex C Definitions).
- The seev.004 message has 5 blocks. The first 2 ("MtgRef" and "FinInstrmId") refer to the General Meeting and the share to which the General Meeting refers, and as such these two will be used to identify the General Meeting, as described below.
- The 3rd block – "OtherDocumentIdentification" – concerns the "*Identification of other messages/documents as well as the messages/documents number*". This block is ignored.
- The 4th block – "Instr" – concerns the instructions and will be explained below.
- The 5th block – "SupplementaryData" – is ignored.
- The AXIA e-SM platform, when it receives a seev.004 message, performs the following steps:
  1. It identifies the General Meetings to which it relates. If not identified, an error message is sent. If the GM is identified, i.e. identified with a meeting held by the platform then:
  2. It identifies the sender of the message.

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[1] '*The MeetingInstruction message (MEIN) is sent by a party holding the right to vote to an intermediary, the issuer or its agent to request the receiving party to act upon one or several instructions*'.

3. The previous two steps apply to all instructions in the message. For each instruction in the message:

   a. It identifies the account to which it relates. If not associated, it is put into the instruction pool (see explanations of pool types in subsection [6]), so that it can be processed by the issuer. If associated with an identified account of the GM, then:

   b. It checks whether the sender of the message is allowed to send this message. If not, it is transferred into the instruction pool so that the issuer can process it; if so then:

   c. It checks if the type of instruction is accepted by the AXIA e-Shareholders Meeting platform.

   d. It checks the instruction blocks.

   e. It checks if the instruction is correct.

   f. If correct, it registers the instruction (vote entry or proxy appointment). If incorrect, it is rejected; if incomplete, it is entered into the instruction pool to be reviewed by the issuer.

   g. It sends an informative seev.006 response message.

These steps are further explained below.

3. Identification of the GM

If the GM data identified in the seev.004 message is the same as that of the GM data specified in seev.001 message, then it is accepted and seev.004 message is also evaluated for the other fields. Otherwise, a seev.006 message (rejection) will be sent with rejection reason for each instruction (EVNM UnrecognisedIdentification / Unrecognised event number)

4. Identification of the sender

The "**business sender**" of the seev.004 message (see Annex C for definitions) is defined in the message header (BAH: Business Application Header) "from".

The **"actual sender"** (see Annex C for definitions) is the one who enters the message in the SWIFT channel.[2] Please note that hereinafter "sender" means "business sender".

Usually, the two entities are the same; however, if they are not, then the "actual sender" is considered to be acting as an "agent" of the "business sender" and this relationship must be declared in the AXIA e-SM platform (ATHEXCSD due diligence with the Agent must have been carried out beforehand). If the actual sender is not declared as an agent, then the message remains in pending status until either the actual sender is declared as such or the vote is closed and rejected, at which point a seev.006 message (rejection) is sent.

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[2] In the corresponding case of seev.047 we have 3 entities, the **actual sender**, the **"from" element in BAH** in the header and the **responding intermediary** in the body of the message, where the role of the business sender is assumed by the responding intermediary the "from" element in BAH is ignored. In the messages we receive, when the actual sender differs from the responding intermediary, we notice that the "from" element in BAH is sometimes the actual sender and sometimes the responding intermediary.

5. Actions for each single seev.004 message instruction

There are 4 types of instructions that can be included in the same seev.004 message[3], out of which, ATHEXGROUP, and therefore the AXIA e-SM platform, supports two, voting and proxy assignment. Instructions containing no votes or proxy assignment will be rejected (status reject) with a seev.006 message.

The shareholders entitled to vote at a GM are those who have been fully identified through an identification request, and the final file with the individual accounts of the shareholders entitled to vote includes the identified individual securities accounts held in the DSS and the beneficiaries identified behind the omnibus securities accounts in the DSS.

The resulting file will be called the GM "**participants file"** and will be created when the receipt of the SI Responses from intermediaries is completed, i.e. after the issuer deadline associated with that particular GM has passed. The participant file will be updated with the fully identified shareholders' securities accounts, while the remaining securities accounts of shareholders that are not fully identified will be included in a specific area of AXIA e-SM platform (the pool of GM participants).

It is strongly recommended that in the seev.047 message (shareholders identification disclosure) the optional '**safekeeping account'** field be filled in, so that the instruction can be linked to the shareholder entitled to vote in seev.004 message. Moreover, the unique identifiers of a shareholder must be the same in seev.047 message and seev.004 message in order to be associated. Otherwise, the instruction is transferred into the instruction pool for the issuer to decide whether to accept or reject it.

Please note the following:
- In seev.004 message, the **AcctDtls/ActId[4]** is the **safekeepingAccount** held by the person entitled to vote with the last intermediary.
- It is important to fill in the account owner field with the **account holder** and the **rightsholders field** with the **persons entitled to vote**. That is, if the account owner field is not populated, they are assumed to be identical with the 1st rightsholder, and if the rightsholder is not filled in, they are assumed to be identical with the account owner.
- Since the GM participant file includes the account holders, if a **pledge** has been set up, the account owner must also be filled in in the instruction, otherwise the link cannot be established. If, for example, a pledge has been set up, the rightsholder shows the pledgor entitled to vote and the account owner shows the shareholder - account holder.
- If a person entitled to vote has **pledges of multiple account holders**, e.g. Participant X has pledges of account holder A (account A) with 500 traded quantities and account holder B (account B) with 100 traded quantities, then they should forward 2 separate instructions rather than a single common instruction, i.e. one instruction with account holder A (account A) as the account owner and Participant X as the rightsholder and

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[3] The MeetingInstruction message is used to vote, to require attendance to a meeting, to request registration of securities and assign a proxy.

[4] In November 2023 Release, ACCtId was made optional and BlckChainAdrOrWllt was added as its alternative for digital products. If BlckChainAdrOrWllt is filled it will be ignored as we do not support digital products.

one instruction with account holder B (account B) as the account owner and Participant X as the rightsholder.

With regards to the validation checks, it is important to fill in the following fields so that the instructions are not rejected:

1. **SnglInstrId Uniqueness:** The ID of the instruction must be unique within each seev.004 message.
2. **Method of participation:** The SpcfcInstrReq/PrtcptnMtd/Cd field must be populated (due to SRD II & the SMPG market standards). Permissible values: only EVOT or PRXY.
3. **Permissible method:** One of the permissible methods of seev.001 must be selected: Mtg/ Prtcptn/ PrtcptnMtd
4. **Check if the method of participation is EVOT:** If the method is EVOT, then the instruction includes votes, so VoteDtls should be populated, and the proxy information should not.
5. **Check if the method of participation is PRXY**: See the table below for the permissible combinations.
6. **Deadline check**: If seev.004 message is received after the GM deadline has passed (seev.001 message: Mtg/ Prtcptn/ IssrDdlnForVtng), then the instruction will go to the instruction pool for the issuer to decide.
7. **Permissible combinations** are shown in the table below

S/N	Voting Scenario	Method of participation	Proxy Type	Vote Details block	Proxy block
1	Holder wants to cast electronic votes	EVOT	N/A	YES	NO
2	Holder appoints chairman	PRXY	CHRM	YES	YES, without PrsnDtls
3	Holder appoints own lawyer (or similar) to attend and vote	PRXY	DISC	NO	YES
4	Holder appoints another holder to attend and vote	PRXY	HLDR	NO	YES
5	Holder appoints the custodian to attend and vote (generic POA needed)	PRXY	N/A	YES	NO
6	Holder appoints the custodian to attend and vote (specific POA needed)	PRXY	DISC	YES	YES

Cases 3 and 4 of the above table appoint a proxy, who will vote by physical presence or virtual participation in the GM, therefore no seev.004 message with a vote will be sent; note that the proxies appointed through cases 3 and 4 of the above table cannot be the 1st or the last intermediary.

In case 5 of the above table, i.e. when the method is PRXY but the proxy details are not filled in (nor is the proxy type), the 1st proxy is assumed to be the custodian of the account and the instruction is immediately accepted; the remaining cases 2,3,4 and 6 (via POA) of the above table go to the instruction pool, where the issuer collecting the proxy appointment forms will have the possibility to accept or reject the proxies.

8. **The instruction blocks (balance)** (AcctDtls/InstdBal), i.e. the number of shares/votes, **are calculated**.
   - In **balance** only Units is accepted as the unit, not FaceAmount.
   - If the instruction is for the total amount of account pieces, then quantity should have been filled in with the special value QALL (Quantity All).
   - **One** order can be given per sub-account. In this case, the **SubAcctId** field should be filled in.
   - If no total amount is given, but quantity is shown by type, then only the INBA is taken into account.
   - If balance exceeds the number of votes, the seev.004 instruction in the participants file will be rejected.
   - If the seev.004 instruction is for a vote and exceeds the difference in the number of votes minus the instructions already accepted, then the instruction will be rejected.
   - If the GM does not allow partial voting (seev.001, PartialVoteAllowed=false), then only one instruction per account is permitted and that instruction is for the total number of pieces.

Votes on agenda items
- A person entitled to participate in a GM may vote either on all items at once, with a single common vote (VoteForAllAgndRsltns), or on each item separately (VotePerAgndRsltn).
- If such person votes on each item separately, then they have 2 options:
  a. to proceed to **VoteInstr** split voting. If not allowed by the GM (seev.001: Vote\SpltVoteAllwd false), then seev.004 instruction is rejected.
  b. to vote for all shares in the **GblVoteInstr** account.
- If they do proceed to split voting, then they define the blocks for each type of vote. However, they may not choose both option a and option b at the same time. To do this, they have to choose a for those items for which they want to split vote, and for those items they do not want to split vote, they have to choose a vote type and QALL.
- Prtry types of vote are not accepted by the AXIA e-SM platform.
- The types of votes supported by the AXIA e-SM platform (VoteInstruction) are: YES, NO and ABSTAIN. If a shareholder entitled to do so does not vote on an item, then they are considered to abstain, and is therefore counted in the ABST votes (ABSTAIN).
- If the sum of the votes on any item exceeds the total number of votes in the instruction, then the instruction is rejected.
- If the sum of the votes on any item is less than the total number of votes in the instruction, then the difference is counted in the ABST votes.

The following table describes the validation **checks and the** corresponding **actions** performed by the **AXIA e-SM platform.**

Table of Validation Checks

S/N	Validation Check	Action in case of failure	see.006 Message
1	Identification of GM*	Rejection and sending of seev.006	RJCT EVNM (Unrecognized Identification)
1aa	If it has multiple pages*	Rejection and sending of seev.006	RJCT OTHR " Pagination is not supported"
1a	BizMsgIdr Uniqueness for the sender in this particular GM*	Rejection and sending of seev.006	RJCT OTHR "duplicate BizMsgIdr for General Meeting"
2	Is the real sender an agent*?	Transfer into the message pool	PNDG ADDM (Additional documents requested missing) "The actual sender is not defined as agent of the sender"
3	Is **SnglInstrId** unique in the message?	Rejection and sending of seev.006	RJCT OTHER "**SnglInstrId is not unique in Message**"
4	If the GM has been cancelled (a relevant seev.002 has been sent)	Rejection and sending of seev.006	RJCT MCAN Event Cancelled
5	If Prxy or VoteDtls is non-empty	Rejection and sending of seev.006	RJCT OTHR "**Messages Prxy and VoteDtls were empty, only Voting and Proxy assignment is supported**"
6	Search for the account in the participants file	If none or more than one account is found, it is transferred into the instruction pool	PNDG OTHR "Account not found. Processed on best effort basis." If it is rejected: RJCT NOSL
7	Is the participation method populated?	Rejection and sending of seev.006	RJCT OTHER "**Participation Method must be filled only EVOT and PRXY are supported**"
8	If the method is EVOT (case 1), then VoteDtls must be populated and the PRXY block must be empty.	Rejection and sending of seev.006	RJCT OTHER "**if Participation Method is EVOT VoteDtls must be filled and Prxy must be missing**"
9	**If the method is PRXY and PrxyTp=CHRM (case 2) , VoteDtls must be populated and Prxy/ PrsnDtls must be empty.	Rejection and sending of seev.006	RJCT OTHER "**if Participation Method is PRXY and PrxyTp=CHRM then VoteDtls must be filled and Prxy/ PrsnDtls must be missing**"
10	**If the method is PRXY and PrxyTp= DISC (cases 3 and 6), then the PRXY block must be populated.	Rejection and sending of seev.006	RJCT OTHER "**if Participation Method is PRXY and PrxyTp=DISC then Prxy block must be filled**"

11	**If Prxy/PrxyTp=HLDR (case 4), then the proxy block must be populated and VoteDtls must be empty.	Rejection and sending of seev.006	RJCT OTHER "**if Participation Method is PRXY and PrxyTp=HLDR then Prxy block must be filled and VoteDtls must not**" ok
12	Prxy/PrxyTp is empty (case 5), then the proxy block must be empty and VoteDtls must be populated.	Rejection and sending of seev.006	RJCT OTHER "**if Participation Method is PRXY and PrxyTp is not filled then Prxy block must not be filled and VoteDtls must be filled**"
13	Deadline for voting 001 Mtg/ Prtcptn/ IssrDdlnForVtng	Transfer to the instruction pool	PNDG ADEA
14	The General Meeting has started.	Rejection and sending of seev.006	RJCT ADEA
15	If the quantity is expressed in FaceAmt or DgtlTknUnit and the quantity is negative or the position is short **AcctDtls/ InstdBal**	Rejection and sending of seev.006	RJCT DQUA "Only positive long Unit positions are supported. if BalTp is filled only INBA is taken into account"
16	If the quantity has decimal places	Rejection and sending of seev.006	RJCT DQUA "no Decimal digits allowed"
17	If balance exceeds the number of votes in the participants file	Rejection and sending of seev.006	"RJCT" Reason LACK LackofSecurities
18	If the instruction is a voting instruction and exceeds the difference of the number of instructions minus the instructions already accepted	Rejection and sending of seev.006	"RJCT" Reason LACK LackofSecurities additonal info already voted
19	If the GM does not allow partial voting	Rejection and sending of seev.006	"RJCT" Reason PART PartialVoteNotAllowed
20	If proceeded to VoteInstr split voting and the GM does not allow it	Rejection and sending of seev.006	"RJCT" Reason SPLT SplitVoteNotAllowed
21	Prtry types of votes not accepted	Rejection and sending of seev.006	"RJCT" Reason OTHER No Proprietary vote types allowed
22	VoteInstruction only For, Agnst, Abstn	Rejection and sending of seev.006	"RJCT" Reason OTHER only For, Agnst, Abstn votes allowed

23	If the sum of the votes on any item exceeds the votes in the instruction	Rejection and sending of seev.006	"RJCT" Reason OTHER wrong number of resolution votes
24	If the resolution is unknown	Rejection and sending of seev.006	"RJCT" Reason RESN ResolutionNumberDiscrepancy

* Applies to all instructions in the seev.004 message
** All prxy case (table of permissible combinations cases 2,3,4 and 6), except 5, if they succeed they do not automatically become "ACPT", they go to the instruction pool for POA approval by the issuer. For these, a seev.006 pending message is sent with reason code "IPOA".
If it passes the checks (except ** above), then it is accepted and 2 seev.006 Accepted messages are sent, with processing status "PACK" and "RCIS".

6. seev.005 Message

The seev.005 is the cancellation message that may be sent by the same Intermediary who sent the seev.004 message, to cancel one, some or all of the instructions sent with a seev.004 message.

In case an Intermediary fills in the non-mandatory fields of the seev.005 message, these will be ignored.

Instructions that have either been accepted or are pending are cancelled. Instructions that have been rejected are mentioned below. When a seev.005 cancellation message is received, the corresponding seev.004 voting instruction to be cancelled is searched for, otherwise a seev.006 rejection message with the code "EVNM" (UnrecognisedIdentification) is sent.

For each instruction the following validation checks are performed:
I.   If instruction seev.004 has already been rejected, then a seev.006 response message with the indication "RJCT, Reason: RBIS (Issuer or registrar has rejected the instruction)" is sent back;
II.   If instruction seev.004 has already been cancelled, then a seev.006 response message with the indication "RJCT, Reason: DCAN (Cancellation request was rejected since the instruction has already been cancelled)" is sent back;
III. If SNGLINSTRID does not exist, then a seev.006 response message with the indication "RJCT, Reason: ULNK (Linked reference is unknown)" is sent back;
IV.   If the deadline set by the issuer (the Vote Deadline of seev.001) has passed, then seev.006 response message with the indication "RJCT, Reason: ADEA (Transaction/instruction received after the account servicer's specified deadline)" is sent back.

When the validation checks are complete, the system attempts to cancel the votes for which the seev.005 message was sent. If this fails for some reason, then the seev.005 cancellation instruction is rejected and the system sends back a response message with the indication "RJCT, Reason: DPRG (Cancellation request has been rejected because the instruction process is in progress or has been processed)".
If the cancellation of the votes is also successful, then the state of the seev.005 message becomes "ACPT" and this is sent back in the seev.006 response message.

7. "Confirmation of receipt of an electronic vote" seev.006 message

The seev.006 is the response message containing the status, i.e. the **confirmation of receipt of an electronic vote** that will be sent to seev.004 or seev.005 messages.
The status applies to the whole single instruction and not just votes for a specific resolution.
A seev.006 general status message for the whole of a message may actually be sent only for seev.005 cancellation messages.
When a seev.004 or seev.005 message is received, the AXIA e-SM platform performs validation checks and where there is a failure, a seev.006 failure response message is sent.
When seev.004 message or seev.005 message is correct, then a seev.006 response message is sent first with processing status "**PACK**" and then with "**RCIS**".
When a seev.004 message is transferred into the AXIA pool, then a seev.006 response message with **pending** status is sent and:

- When the issuer accepts a seev.004 instruction, this message is taken out of the instruction pool and a seev.006 response message with indications "PACK" and "RCIS" is sent.
- When the issuer rejects it, a seev.006 response message with a reject indication is sent and the message is then removed from the instruction pool.

Note that it will be possible to send seev.005 cancellation messages until the deadline for seev.004 (the Vote Deadline of seev.001).

8. "Confirmation of the recording and counting of electronic votes" seev.007 message

This message is sent after the end of the GM in accordance with the SRD II regulatory framework. A seev.007 message will be sent for each seev.004 message that contains at least one voting instruction for which:

- a. a **confirmation of recording and counting of votes has been requested to be sent by the intermediary on behalf of the person entitled to vote** (i.e. the field of the seev.004 Instr/VoteExctnConf message is **YES**);
- b. **the instruction has become "ACPT"**, therefore it has been recorded and counted at the GM.

The seev.007 message will contain the confirmations of all instructions in the original seev.004 message for which both conditions (a) and (b) above apply and will be sent to the actual sender of the seev.004 message. However it is noted that the **"To"** field in BAH will be the sender, i.e. the one who appeared in the **"From"** field in BAH of seev.004 (004.BAH BizMsgIdr=007. MtgVoteExctnConf/ MtgInstrId).
The GM identification data, MtgRef and FinInstrmId, will be filled in as in seev.004.

In the seev.007 message for each instruction (VoteInstrs), the following fields will be filled in as follows:

- **SnglInstrId:** fill in as in seev.004
- **AcctId:** fill in as in seev.004
- **AcctOwnr & RghtsHldr:** do not fill in these **since they are not mandatory**
- **ModalityOfCounting**: **EVBM**, because during the GM no seev.004 messages will be accepted
- **VoteRctDtTm:** fill in the day and time when the seev.004 message was received
- **VotePerRsltn:** The votes are indicated as they were eventually cast, e.g. if the item was cancelled, all votes are marked "0"; QALL has been translated to the votes it had based on the content of its portfolio, and any votes not reported (not cast) were immediately registered as abstained, etc. "Withdrawn" if the resolution was withdrawn.

B.   Annex B – References

1. ISO 20022 General Meeting-Maintenance 2021–2022 Message Definition Report - Part 2
2. ISO 20022 General Meeting-Maintenance 2021–2022 Message Definition Report - Part 1
3. SMPG General Meeting messages Market Practice SR2021
4. SWIFT ISO 20022 General Meeting Messages ClearStream user Guide
5. https://www.iso20022.org/maintenance/catalogue-change-requests?search=seev.004
    Change requests for seev.004

C.   Annex C – Definitions

Glossary

Account Owner: Party that legally owns the account. Src: General Meeting - Maintenance 2021 – 2022 Message Definition Report - Part 2 6.4.4.4.2 AccountOwner <AcctOwnr>

Account Servicer: Party that manages the account on behalf of the account owner, that is manages the registration and booking of entries on the account, calculates balances on the account and provides information about the account. Src: Shareholders Identification Disclosure Message Definition Report Part 2 5.4.5.2.2 AccountServicer <AcctSvcr>

Rights Holder: the owner of the voting rights, who can be, or not, the same as the owner. (Swift mail)

Last intermediary: the last intermediary in the chain, the Account servicer of the BENE account. That is, the direct administrator of the BENE account.

First intermediary: the first intermediary in the chain, i.e. the operator of the first account in the chain that is known to the depository and leads to the individual account

Business sender: this is specified in the message header (BAH) in "from".

Actual sender: this is the one who enters the message in the SWIFT channel or is declared in the Apex GUI as the uploading company.