Shareholders Identification Disclosure messages Market Practice

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Table of Contents

I. <u>Revision Record</u>

Version	Publication Date	Sections Affected	Description
SR2023 V1.0	12 July 2023	II, III, IV, VI, VII, XIII, IX, XII	- Inclusion of SR2023 changes – New element <PlacOfJur> and <AppLaw>. Changes to extend the usage of these messages to other disclosure requests than those within EU directive (SRDII). - Clarification of the pagination mechanism
SR2021 v1.0	12 October 2021	IX B.	Detailed Usage information amended for: Account servicer, Shareholding Balance On Own Account, Shareholding Balance On Client Account, Total Shareholding Balance
SR2021 v0.1 DRAFT	27 July 2021	VII C. IX B.	Inclusion of SR2021 changes: - New element "PreviousDisclosureRequestIdentification" - Pagination, SafekeepingAccount
SR2020	26 June 2020		Initial version for SR2020

II. Introduction

Shareholder identification ISO 20022 messages were originally designed to comply with the Shareholders Rights Directive (EU) 2017/828 and Implementing Regulation (EU) 2018/1212 (hereinafter "SRD II").

Although this market practice is primarily based on SRD II and the SRD II Market Standards for Shareholder Identification, shareholder identification messages could also be used to address other requests to disclose the right holders identity, as long as the flow of information from the right-holder to the issuer follow the message flow described in this document.

The use of the corporate action notifications and instructions messages (in ISO 15022 or ISO 20022 formats) with corporate action event type code DSCL/Disclosure, is not compliant with SRD II, but will remain in the ISO standards for other disclosure processes/purposes.

III. Scope and definitions

The scope of this document is to describe the market practice for using the Shareholders Identification Disclosure messages.

The market practices described in this document are meant to be used exclusively with the following ISO 20022 messages and the business application header (BAH) - head.001.001.0x:

MessageDefinition	Abbreviated Name	Message Identifier
ShareholderIdentificationDisclosureRequest	SIDR	seev.045.001.04
ShareholderIdentificationDisclosureRequestCancellationAdvice	SIDC	seev.046.001.01
ShareholderIdentificationDisclosureResponse	SIRE	seev.047.001.02
ShareholderIdentificationDisclosureResponseCancellationAdvice	SIRC	seev.048.001.01
ShareholderIdentificationDisclosureResponseStatusAdvice	SIRS	seev.049.001.01
SecuritiesMessageRejection		semt.001.001.004

All documentation related to shareholder identification messages is available in the UHB on-line page on swift.com in the Knowledge Centre: https://www2.swift.com/knowledgecentre/products/Standards%20MX

The 5 new shareholder identification messages and the securities message rejection are available on MyStandard at: https://www2.swift.com/mystandards/#/ISO20022?businessDomain=Securities in the "securities events" section and "securities management" section. Both PDF or Excel or schemas (with an MS license) can be exported. The documentation and schemas are also available on the www.ISO20022.org web site: ISO 20022 Message Definitions | ISO20022 under the "ShareholderIdentificationDisclosure" title.

IV. Actors and Roles

The main roles involved in this process:

1. Issuer

    The party that has issued the securities and is requesting the identity of its rights holders.

    In SRD II context: A company which has its registered office in a Member State and the shares of which are admitted to trading on a regulated market situated or operating within a Member State or a third party nominated by such a company for the tasks set out in this Regulation.

2. Third party/issuer agent

The third party to whom the issuer has delegated responsibility for sending the request and/or receiving responses. This is an optional role; the issuer may elect to send the request and/or to receive responses itself. Any intermediary, including the issuer's Central Security Depository (CSD), can act as third party/issuer agent.

3. Central Security Depository (CSD)

The issuer CSD is the CSD in which the securities have been issued. The issuer CSD is the primary register for the issuance, unless this function is performed by another party, such as a registrar. A CSD can also have an account with the issuer CSD to enable the cross-system settlement of securities transactions.

4. Intermediary

An institution that holds securities on behalf of other institutions and/or end investors (natural or legal persons). A CSD is also an intermediary.

    a. Local custodian

The party that acts as CSD member, holding assets on behalf of clients in one or more securities accounts in the books and records of the issuer CSD. The local custodian may be the last intermediary, i.e. a client may be the end investor/shareholder.

    b. Global custodian

The party that acts as client of the CSD member, in turn holding assets on behalf of clients in one or more securities accounts in the books and records of the local custodian. The global custodian may be the last intermediary, i.e. a client may be the end investor/shareholder.

There may be additional intermediaries. We will limit the market practice to the main roles and actors.

V. Activity Diagram
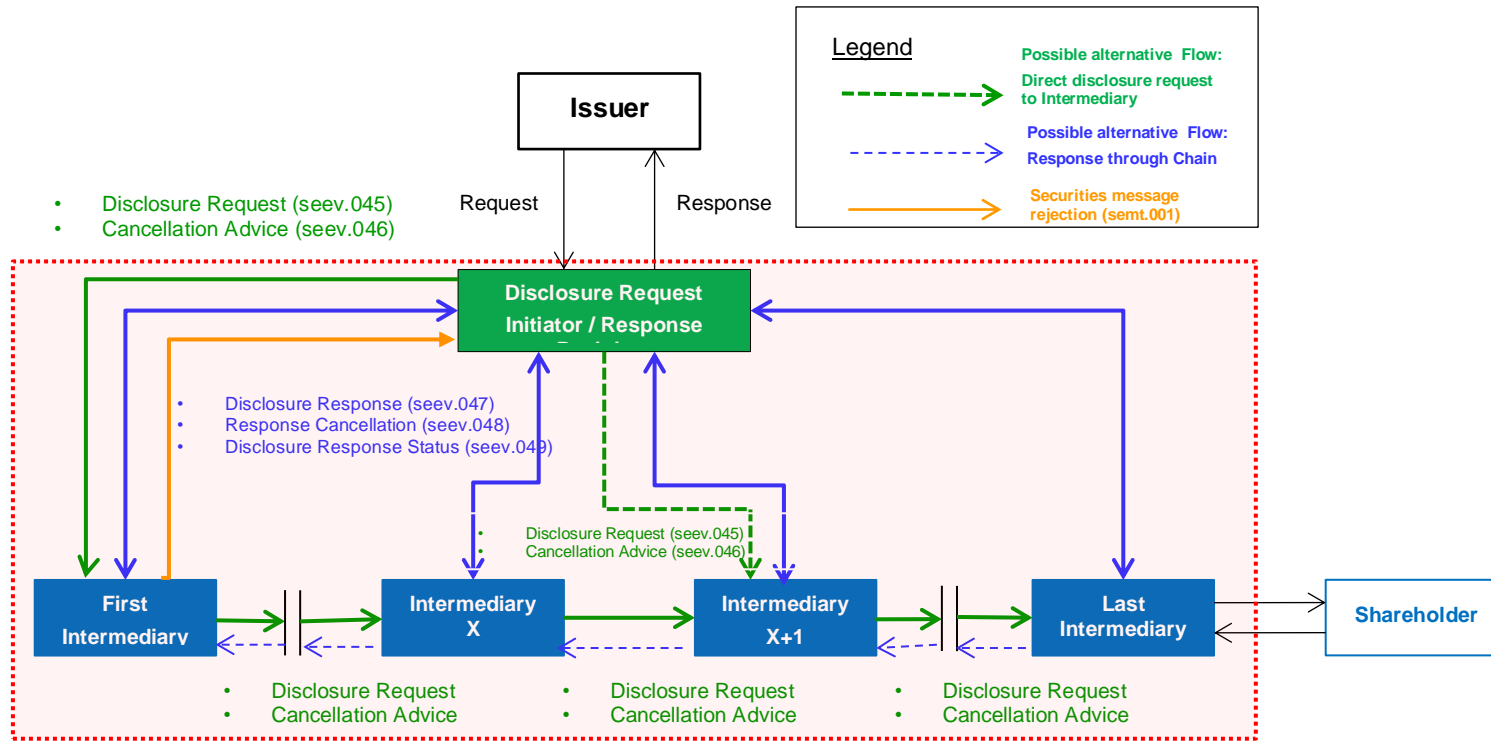
ISO Messaging Solution Scope

Note: the Securities Message Rejection message can be used by the first intermediary to reject a shareholder identification request.

VI. SRD II Message Flows illustrations

SRD II SHAREHOLDER IDENTIFICATION MESSAGE FLOWS

- This overview of the shareholder identification message flows reflects both the Market Standards for Shareholder Identification and the SMPG market practice:

STANDARD 1
Request do disclose information regarding shareholder identity (through the intermediary chain)

Recommended message flows:
1. Shareholder identification request
2. Shareholder identification request cancellation

STANDARD 3
Response to shareholder identification request (directly to the issuer/agent, not through the intermediary chain)

Recommended message flows:
1. Shareholder identification response
2. Shareholder identification response cancellation
3. Shareholder identification response status

EXCEPTIONAL PROCESS
Request to disclose shareholder identity (without going through the intermediary chain)
Response to shareholder identification request (through the intermediary chain)

SRD II SHAREHOLDER IDENTIFICATION MESSAGE FLOWS

1. Request to disclose information regarding shareholder identity (through the intermediary chain)

1 ISSUER/ ISSUER AGENT

2 ISSUER CSD
FIRST INTERMEDIARY

3 LOCAL CUSTODIAN
INTERMEDIARY #2

4 GLOBAL CUSTODIAN
INTERMEDIARY #3

5 INTERMEDIARY
INTERMEDIARY #4

SHAREHOLDER IDENTIFICATION REQUEST

SHAREHOLDER IDENTIFICATION REQUEST CANCELLATION

SHAREHOLDER IDENTIFICATION REQUEST

- The issuer, issuer agent or third party nominated by the issuer sends the request to disclose information regarding shareholder identity to the first intermediary (i.e. issuer CSD)
- The first intermediary will transmit the request to disclose information regarding shareholder identity to the next intermediary in the chain who has a holding on record date in the underlying security
- Each intermediary that has received the request to disclose information regarding shareholder identity shall transmit the request to its clients that are themselves intermediaries

SHAREHOLDER IDENTIFICATION REQUEST CANCELLATION

- Any update or cancellation to the shareholder identification request send by the issuer or third party nominated by the issuer will be transmitted to the next intermediary in the chain applying the same diligence

SRDII SHAREHOLDER IDENTIFICATION MESSAGE FLOWS

2. Response to shareholder identification request (directly to the issuer/agent, not through the intermediary chain)

| 1 | ISSUER/ ISSUER AGENT | 2 | ISSUER CSD *FIRST INTERMEDIARY* | 3 | LOCAL CUSTODIAN *INTERMEDIARY #2* | 4 | GLOBAL CUSTODIAN *INTERMEDIARY #3* | 5 | INTERMEDIARY *INTERMEDIARY #4* |

SHAREHOLDER IDENTIFICATION RESPONSE

SHAREHOLDER IDENTIFICATION RESPONSE STATUS

SHAREHOLDER IDENTIFICATION RESPONSE CANCELATION
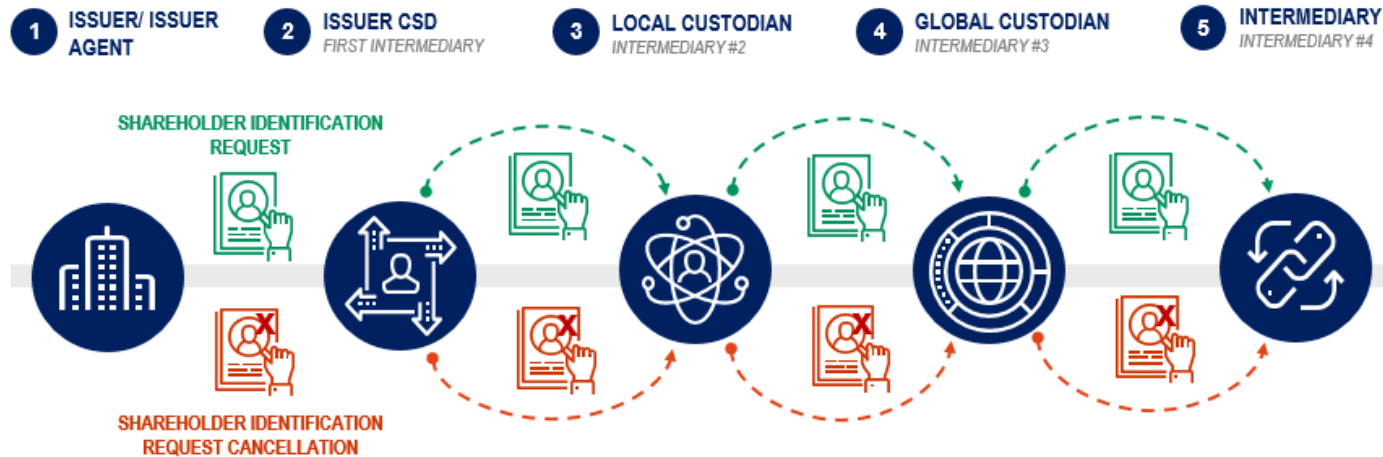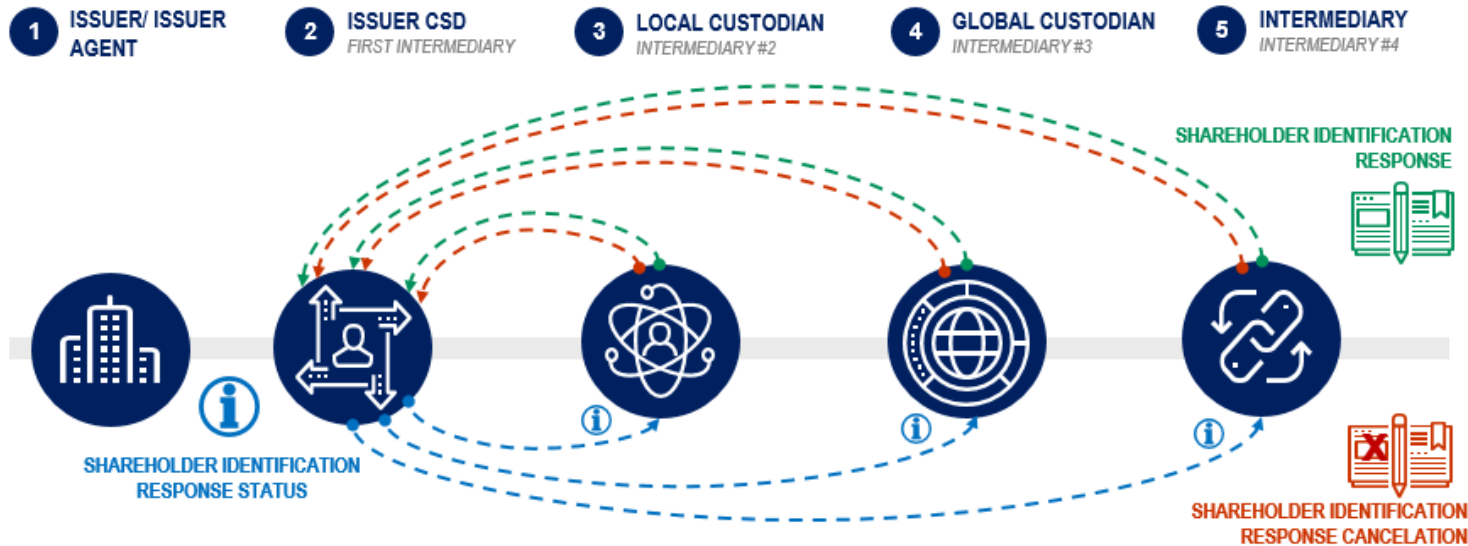
SHAREHOLDER IDENTIFICATION RESPONSE

- The response to the request to disclose shareholder identity shall be provided and transmitted by each Intermediary to the address defined in the request, i.e. the response is sent directly by each intermediary and it is not transmitted through the intermediary chain

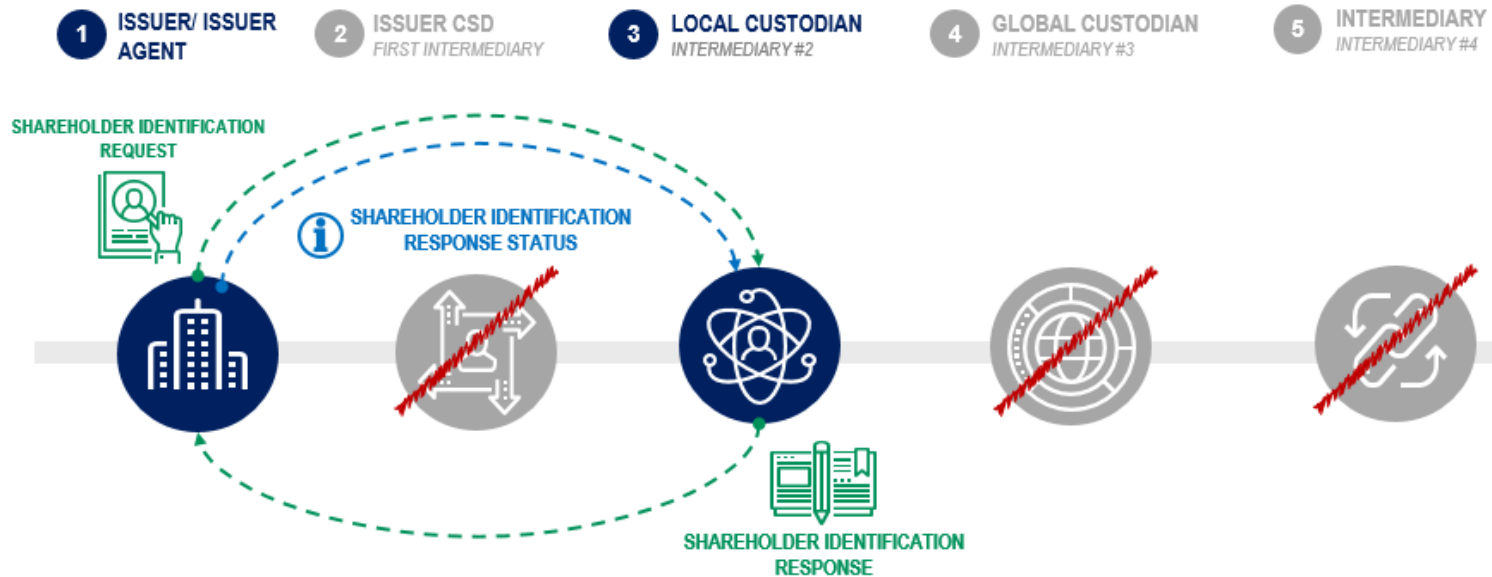**SHAREHOLDER IDENTIFICATION RESPONSE CANCELLATION**

- Any update or cancellation to the shareholder identification response sent by the intermediary will be transmitted to the address defined in the request applying the same diligence

SHAREHOLDER IDENTIFICATION RESPONSE STATUS

- Each intermediary will receive a status message on the acceptance status of the response received by the issuer

SRD II SHAREHOLDER IDENTIFICATION MESSAGE FLOWS

3. Request and response to disclose shareholder identity (without going through the intermediary chain) – **EXCEPTIONAL FLOW**

1 **ISSUER/ ISSUER AGENT**	**2** ISSUER CSD *FIRST INTERMEDIARY*	**3** **LOCAL CUSTODIAN** *INTERMEDIARY #2*	**4** GLOBAL CUSTODIAN *INTERMEDIARY #3*	**5** INTERMEDIARY *INTERMEDIARY #4*

SHAREHOLDER IDENTIFICATION REQUEST

SHAREHOLDER IDENTIFICATION RESPONSE STATUS

SHAREHOLDER IDENTIFICATION RESPONSE

EXCEPTIONAL PROCESS - SHAREHOLDER IDENTIFICATION REQUEST AND RESPONSE

- The issuer, issuer agent or third party nominated by the issuer sends the request to disclose information regarding shareholder identity directly to an intermediary (without going through the intermediary chain)
- The intermediary that receives the request to disclose information regarding shareholder identity shall not transmit the request to its clients that are themselves intermediaries
- The response to the request to disclose shareholder identity shall be provided and transmitted by the intermediary to the address defined in the request sent by the issuer
- The issuer, issuer agent or third party nominated by the issuer will inform the intermediary about the acceptance status of the response received

SRDII SHAREHOLDER IDENTIFICATION RESPONSE – TYPE OF SHAREHOLDING

ISSUER/ ISSUER AGENT/ THIRD PARTY

- ISSUER/ISSUER AGENT SENDS 1 SHAREHOLDER ID REQUEST TO ISSUER CSD
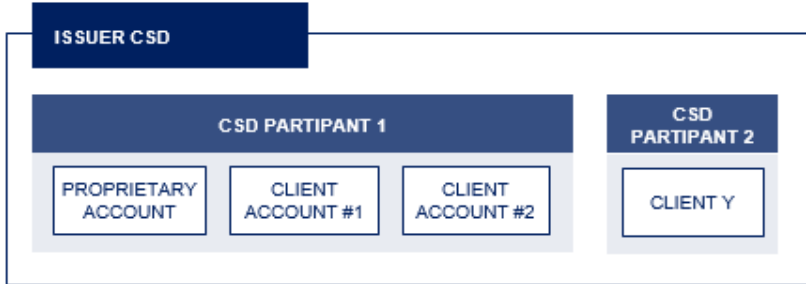
ISSUER CSD

- ISSUER CSD SENDS 1 SHAREHOLDER ID REQUEST P/ CSD PARTICIPANT

CSD PARTIPANT 1

| PROPRIETARY ACCOUNT | CLIENT ACCOUNT #1 | CLIENT ACCOUNT #2 |

CSD PARTIPANT 2

CLIENT Y

RESPONDING INTERMEDIARY = ISSUER CSD

ISSUER CSD TO REPORT:

- CSD PARTIPANT 1 / PROPRIETARY ACCOUNT = B
- CSD PARTIPANT 1 / CLIENT ACCOUNT #1 = N (REQUEST FORWARDED)
- CSD PARTIPANT 1 / CLIENT ACCOUNT #2 = N (REQUEST FORWARDED)
- CSD PARTIPANT 2 / CLIENT Y = N (REQUEST FORWARDED)

CSD PARTIPANT 1

| CLIENT A | CLIENT B OWN ACCOUNT | CLIENT B' CLIENTS ACCOUNT | CLIENT C |

RESPONDING INTERMEDIARY = CSD PARTICIPANT 1
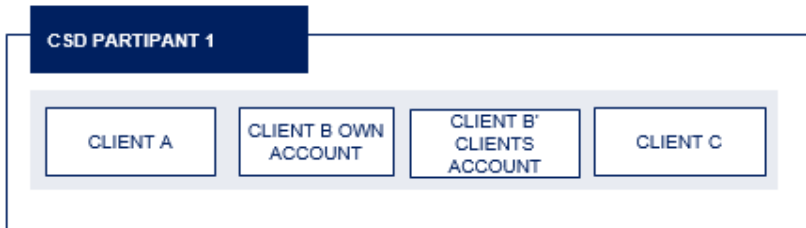
CSD PARTICIPANT 1 TO REPORT:

- CLIENT A = B
- CLIENT B OWN ACCOUNT = B
- CLIENT B' CLIENTS ACCOUNT = N (REQUEST FORWARDED)
- CLIENT C = U (REQUEST FORWARDED)

CLIENT C*

| CLIENT C PROPRIETARY ASSETS | CLIENT ASSETS |

*COMINGLED ACCOUNT

RESPONDING INTERMEDIARY = CLIENT C

CLIENT C TO REPORT:

- CLIENT C PROPRIEATRY ASSETS = O
- CLIENT ASSETS = B or N (if N - REQUEST FORWARDED)

Per table 2 of Regulation (EU) 2018/1212 – Type of shareholding:

O = shareholding on own account; N = nominee shareholding; B = beneficial shareholding; U= unknown

VII. Shareholders Identification Disclosure Request

A. Scope

For the above-described different communication needs, the following business data are required. Focus is on the processes described in the MP,

B. Common mandatory business data requirements

The SMPG recommends that all the below optional and mandatory elements be present in all Shareholders Identification Disclosure Request messages. M / C / O identifies whether the business data is mandatory, conditional or optional in the ISO 20022 standards.

Common mandatory elements	Place	Detailed usage	M/C/O	SRD II reference[1]
From, <Fr>	BAH	The sender from a business context, which can be different than the actual sender in the transport header (similar to MEOR in MT). BICFI is the preferred format. Please refer to appendix I for more details.	M	
To, <To>	BAH	The receiver from a business context, which can be different than the actual receiver in the transport header (similar to MERE in MT). BICFI is the preferred format. Please refer to appendix I for more details.	M	
BusinessMessageIdentifier, <BizMsgIdr>	BAH	The sender's unique ID/reference of the message	M	
MessageDefinitionIdentifier, <MsgDefIdr>	BAH	Contains the MessageIdentifier that defines the BusinessMessage, e.g. seev.045.001.xx	M	
CreationDate, <CreDt>	BAH	Date and time, using ISONormalisedDateTime format	M	
Issuer Disclosure Request Identification, <IssrDsclsrReqId>	Document		M	Table 1 – A1
Disclosure Request Type, <DsclsrReqTp>	Document	A REPL message should only be sent in case of a change in the issuer deadline of a previously announced request. In case any other element in the request changes, the request should be withdrawn/cancelled.	M	Table 1 – A2

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[1] This column map each element in the messages to table I and II in SRDII implementing regulation. Although these messages were originally created to comply with SRD II, they could also be used to address other requests to disclose the right holders identity, as long as the flow of information from the right-holder to the issuer follow the message flow described in this document.

Forward Request Indicator, <FwdReqInd>	Document	This indicator should always be present to avoid any misunderstanding.	O	Table 1 – A3
ShareholderRightsDirectiveIndicator <ShrhldrRghtsDrctvInd>	Document	This indicator should be used to identify shareholder identification requests issued under SRDII as per its transposition in the local law. This indicator should be set by the issuer CSD or first intermediary. It should be set to YES (value "true") only when the request is in scope of SRD II and the request has been received from the issuer. When the indicator is set to NO (value "false"), the request is to be intended as in scope of SRDII but the issuer CSD or first intermediary did not receive it from the issuer. Any other intermediary in the chain should report the value of this indicator as per the value received from the previous intermediary. If the shareholder identification request is outside the scope of SRD II, this indicator should not be populated.	C	
Place Of Jurisdiction <PlcOfJursdctn>	Document	This data element should record the country/jurisdiction of the governing law under which the holder identification request is issued. It should not be populated for requests issued under SRDII or its transposition laws.	C	
Applicable Law <AplblLaw>	Document	This data element should record the applicable law under which the holder identification request is issued. It should not be populated for requests issued under SRDII or its transposition laws. A list of such applicable laws, albeit not complete or exhaustive, can be found in appendix II.	O	
Financial Instrument Identification, <FinInstrmId>	Document	ISIN is the preferred format	M	Table 1 – A4
Shareholders Disclosure Record Date, <ShrhldrsDsclsrRcrdDt>	Document	Date (YYYY-MM-DD) is the preferred format	M	Table 1 – A5

Disclosure Response Recipient - Identification, \<Id>	Document	LEI is the preferred format	M	Table 1 – B1
Disclosure Response Recipient - Recipient Name, \<RcptNm>	Document		M	Table 1 – B2
Disclosure Response Recipient - Response Recipient Address, \<RspnRcptAdr>	Document	AnyBIC is the preferred format.	M	Table 1 – B3
Issuer Disclosure Deadline, \<IssrDsclsrDdln>	Document	DateTime in UTC format is the preferred format (YYYY-MM-DDThh:mm:ss.sssZ (Z means Zulu Time ≡ UTC time ≡ zero UTC offset))	M	Table 1 – A6

C. Optional business data requirements

The below optional elements may be provided in a Shareholders Identification Disclosure Request message but are optional. If used, they must be used as described in the "Detailed usage" column. It is to be noted that most of the usage rules are standards rules, not market practice recommendations.

Any other elements not mentioned above or below are considered NOT needed for this specific type of message. If used, they will be market-specific.

Common optional elements	Place	Detailed usage	M/C/O	SRD II reference
Previous Disclosure Request Identification \<PrvsDsclsrReqId>	Document	To only be used when sending a REPL message. Provides the identification of a previously sent disclosure request message (Business Message Identifier).	O	
Response Through Chain Indicator, \<RspnThrghChainInd>	Document	In line with the shareholder identification market standards, the shareholder identification response should be sent directly to the issuer or the third party appointed by the issuer. This indicator should ONLY be present when the response has to go through the chain.	O	
Shares Quantity Threshold, \<ShrsQtyThrshld>	Document	If used, it has to be provided by the issuer as a quantity of shares	O	Table 1 – A7
Request Share Held Date, \<ReqShrHeldDt>	Document	In line with the shareholder identification market standards, this indicator should NOT be used.	O	Table 1 – A8

		If present, the issuer must also specify the method to be used to calculate the date and the description		
Date Calculation Method, <DtClctnMtd>	Document	Only to be used if the Request Share Held Date is present	O	
Disclosure Response Deadline <DsclsrRspnDdln>	Document	Only to be used if the response is to be sent through the chain as indicated in Response Through Chain Indicator	O	
Issuer <Iss>	Document	In case the issuer wants to provide information beyond the ISIN, they can optionally provide their name and address and the LEI. LEI is the preferred format.	O	

C*: The block is optional, but if the block is included, the element is mandatory.

Once received, it is recommended that each intermediary sends one request per downstream intermediary (N or U) with a holding or pending transaction in the underlying financial instrument, according to the BIC/DN specified for the message type.

The following examples should illustrate which combinations of ShareholderRightsDirectiveIndicator <ShrhldrRghtsDrctvInd>, Place Of Jurisdiction<PlacOfJur> and Applicable Law<AppLaw> are valid.

ShareholderRightsDirectiveIndicator <ShrhldrRghtsDrctvInd>	Place Of Jurisdiction <PlcOfJursdctn>	Applicable Law <AplblLaw>	Comments
Y	N	N	The SRD indicator should only be set to true if the request falls within the scope of SRD II.
N	Y	Y	

VIII. Shareholders Identification Disclosure Request Cancellation Advice

A. Scope

For the above-described different communication needs, the following business data are required. Focus is on the processes described in the MP.

B. Common mandatory business data requirements

The SMPG recommends that all the below optional and mandatory elements be present in all Shareholders Identification Disclosure Request Cancellation Advice messages. M / C / O identifies whether the business data is mandatory, conditional or optional in the ISO 20022 standards.

Common mandatory elements	Place	Detailed usage	M/C/O	SRD II reference
From, <Fr>	BAH	The sender from a business context, which can be different than the actual sender in the transport header (similar to MEOR in MT). BICFI is the preferred format. Please refer to appendix I for more details.	M	
To, <To>	BAH	The receiver from a business context, which can be different than the actual receiver in the transport header (similar to MERE in MT). BICFI is the preferred format. Please refer to appendix I for more details.	M	
BusinessMessageIdentifier, <BizMsgIdr>	BAH	The sender's unique ID/reference of the message	M	
MessageDefinitionIdentifier, <MsgDefIdr>	BAH	Contains the MessageIdentifier that defines the BusinessMessage, e.g. seev.046.001.01	M	
CreationDate, <CreDt>	BAH	Date and time, using ISONormalisedDateTime format	M	
Issuer Disclosure Request Identification, <IssrDsclsrReqId>	Document		M	
Financial Instrument Identification, <FinInstrmId>	Document	ISIN is the preferred format	M	

Shareholders Disclosure Record Date, <ShrhldrsDsclsrRcrdDt>	Document	Date (YYYY-MM-DD) is the preferred format	M	
CancellationReason, <CxlRsn>	Document	WITH is ONLY to be used in case of a cancellation triggered by the issuer or the third party appointed by the issuer. For any other scenario, PROC should be used.	M	

C. Optional business data requirements

The below optional elements may be provided in a Shareholders Identification Disclosure Request Cancellation Advice message but are optional. If used, they must be used as described in the "Detailed usage" column. It is to be noted that most of the usage rules are standards rules, not market practice recommendations.

Any other elements not mentioned above or below are considered NOT needed for this specific type of message. If used, they will be market-specific.

Common optional elements	Place	Detailed usage	M/C/O	SRD II reference
Related – From, <Fr>	BAH	Optional block in the BAH, for the related message: the sender from a business context, which can be different than the actual sender in the transport header (similar to MEOR in MT). BICFI is the preferred format	C*	
Related – To, <To>	BAH	Optional block in the BAH, for the related message: the receiver from a business context, which can be different than the actual receiver in the transport header (similar to MERE in MT). BICFI is the preferred format	C*	
Related – BusinessMessageIdentifier, <BizMsgIdr>	BAH	Optional block in the BAH, for the related message: the sender's unique ID/reference of the message	C*	
Related – MessageDefinitionIdentifier, <MsgDefIdr>	BAH	Optional block in the BAH, for the related message: contains the MessageIdentifier that defines the BusinessMessage, e.g. seev.045.001.xx	C*	
Related – CreationDate, <CreDt>	BAH	Optional block in the BAH, for the related message: date and time, using ISONormalisedDateTime format	C*	

C*: The block is optional, but if the block is included, the element is mandatory.

IX. Shareholders Identification Disclosure Response

A. Scope

For the above-described different communication needs, the following business data are required. Focus is on the processes described in the MP:

B. Common mandatory business data requirements

The SMPG recommends that all the below optional and mandatory elements be present in all Shareholders Identification Disclosure Response messages. M / C / O identifies whether the business data is mandatory, conditional or optional in the ISO 20022 standards.

Common mandatory elements	Place	Detailed usage	M/C/O	SRD II reference
From, <Fr>	BAH	The sender from a business context, which can be different than the actual sender in the transport header (similar to MEOR in MT). BICFI is the preferred format. Please refer to appendix I for more details.	M	
To, <To>	BAH	The receiver from a business context, which can be different than the actual receiver in the transport header (similar to MERE in MT). BICFI is the preferred format. Please refer to appendix I for more details.	M	
BusinessMessageIdentifier, <BizMsgIdr>	BAH	The sender's unique ID/reference of the message	M	
MessageDefinitionIdentifier, <MsgDefIdr>	BAH	Contains the MessageIdentifier that defines the BusinessMessage, e.g. seev.047.001.xx	M	
CreationDate, <CreDt>	BAH	Date and time, using ISONormalisedDateTime format	M	
Pagination	Document	Recommended to be used even if the response only include one page. The pagination starts at number 1 and is incremented of 1 unit at each new page.	O	
Issuer Disclosure Request Identification, <IssrDsclsrReqId>	Document		M	Table 2 – A1

Financial Instrument Identification, <FinInstrmId>	Document	ISIN is the preferred format	M	Table 2 – A4
Shareholders Disclosure Record Date, <ShrhldrsDsclsrRcrdDt>	Document	Date (YYYY-MM-DD) is the preferred format	M	Table 2 – A5
Disclosure Response Identification, <DsclsrRspnId>	Document		M	Table 2 – A2
Responding Intermediary – Name, <Nm>	Document		M	Table 2 – B2
Responding Intermediary – Identification, <Id>	Document	LEI is the preferred format	M	Table 2 – B1
Responding Intermediary – Contact Person, <CtctPrsn>	Document	Name and email address are recommended	O	
Safekeeping Account, <SfkpgAcct>	Document	Safekeeping account that the responding intermediary has with the intermediary up the chain. The first intermediary should use "N/A".	M	Table 2 – B7
Account Servicer, <AcctSvcr>	Document	Intermediary up the chain from the responding intermediary, i.e. the entity where the responding holds the above safekeeping account. LEI is the preferred format. The first intermediary should use the "Identification" and "Issuer" fields set to "N/A" in the ProprietaryIdentification sequence.	M	Table 2 – B6
Shareholding Balance On Own Account, <ShrhldgBalOnOwnAcct>	Document	Quantity of securities held by the responding intermediary for its own account, as settled position at end of day on Shareholders Disclosure Record Date. May include non-disclosed or below threshold balances.	M	Table 2 – B4

Shareholding Balance On Client Account, <ShrhldgBalOnClntAcct>	Document	Quantity of securities held by the responding intermediary on behalf of clients, as settled position at end of day on Shareholders Disclosure Record Date. May include non-disclosed or below threshold balances.	M		Table 2 – B5
Total Shareholding Balance, <TtlShrhldgBal>	Document	Sum of the securities quantity held by the responding intermediary for its own account and of securities quantity held on behalf of clients, as settled position at end of day on Shareholders Disclosure Record Date. May include non-disclosed or below threshold balances.	M		Table 2 – B3
Non Disclosed Shareholding Quantity, <NonDscldShrhldgQty>	Document	This element is to be used to indicate any securities quantity held by clients of the responding intermediary who have prohibited disclosure. This element should be used only when the quantity is not zero.	O		
Below Threshold Shareholding Quantity, <BlwThrshldShrhldgQty>	Document	This element is to be used to indicate any securities quantity held by clients of the responding intermediary having a balance below threshold. This element should be used only when the quantity is not zero.	O		
Safekeeping Account, <SfkpgAcct>	Document	The account number at the responding intermediary. Recommended to be included to facilitate the issuer's reconciliation. The account should be a real account (no narrative or institution names).	O		
Account Holder – Legal Person – Name And Address, <NmAndAdr>	Document		M		Table 2 – C2(a) and C3-9
Account Holder – Legal Person – Identification, <Id>	Document	LEI or national registration number are the preferred formats	M		Table 2 – C1(a)

Account Holder – Natural Person – Name And Address, <NmAndAdr>	Document			M	Table 2 – C2(b) and C3-9
Account Holder – Natural Person – Identification, <Id>	Document	See Appendix III		M	Table 2 – C1(b)
Shareholding Type, <ShrhldgTp>	Document			M	Table 2 – C10
Quantity, <Qty>	Document			M	Table 2 – C11

C. <u>Optional business data requirements</u>

The below optional fields may be provided in a Shareholders Identification Disclosure Response message but are optional. If used, they must be used as described in the "Detailed usage" column. It is to be noted that most of the usage rules are standards rules, not market practice recommendations.

Any other fields not mentioned above or below are considered NOT needed for this specific type of message. If used, they will be market-specific.

Common optional elements	Place	Detailed usage	M/C/O	SRD II reference
Initial Date Of Shareholding, <InitlDtOfShrhldg>	Document	To be reported only if and as requested in the SI request. Date (YYYY-MM-DD) is the preferred format	O	Table 2 – C12
Third Party – Role, <Role>	Document	To be used with code DECM, to report the details of the third party who is authorised to take investment decisions on behalf of the shareholder	O	Table 2 – C13
Third Party – Name, <Nm>	Document	To be used to report the name of the third party	O	Table 2 – C13
Third Party – Identification, <Id>	Document	To be used to report the ID of the third party LEI is the preferred format	O	Table 2 – C14

D. <u>Pagination for the Shareholder Identification Disclosure Response Message</u>

If the amount of shareholding information to be sent to the response recipient in the *ShareholdersIdentificationDisclosureResponse* (seev.047) message is too large for a single message (i.e. the length would overcome the maximum network payload size limit - for instance 10K characters on SWIFTNet

FIN or 100 KB on SwiftNet Interact or FINplus for the payload), the responding intermediary may split the information in several paginated seev.047 using the pagination mechanism.

The need for pagination would occur for instance when many repetitions of SafekeepingAccountAndHoldings or of Disclosure at the account sublevel are present.
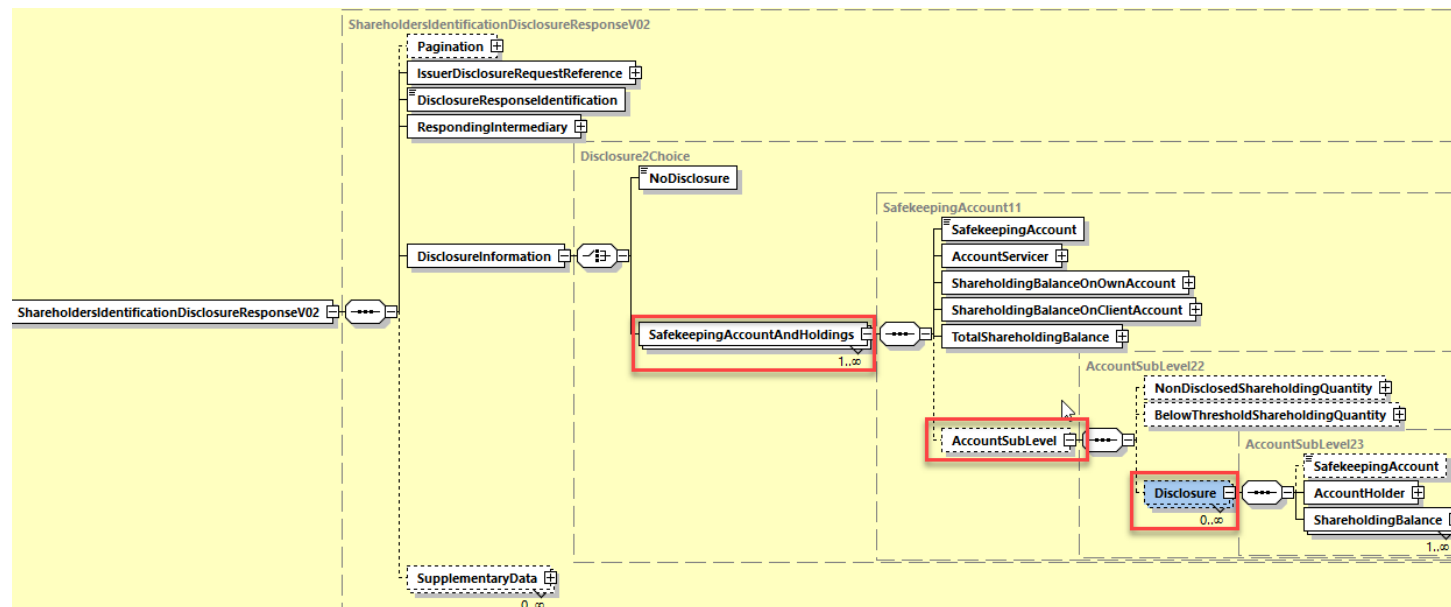
In a set of paginated disclosure response messages, all common mandatory elements must bear the same values across all pages.

This means for instance that the following fields ShareholdingBalanceOnOwnAccount, ShareholdingBalanceOnClientAccount and TotalShareholdingBalance must be present in each page of the response since they are mandatory fields and that their values must be identical in each page of the disclosure response i.e. their values cannot be a function of the balance details provided in a page.

It is also recommended to repeat all common optional elements in each pages as well.

The "*BusinessMessageIdentifier*" (<BizMsgIdr>) element in the Business Application Header (BAH – head.001) must be different for each paginated message. However, the "*DisclosureResponseIdentification*" element value in the seev.047 message will be identical for all pages.

Pagination must always start at page "1" and must be incremented by 1 at each subsequent page.

X. Shareholders Identification Disclosure Response Cancellation Advice

A. Scope

For the above-described different communication needs, the following business data are required. Focus is on the processes described in the MP:

B. Common mandatory business data requirements

The SMPG recommends that all the below optional and mandatory elements be present in all Shareholders Identification Disclosure Response Cancellation Advice messages. M / C / O identifies whether the business data is mandatory, conditional or optional in the ISO 20022 standards.

Common mandatory elements	Place	Detailed usage	M/C/O	SRD II reference
From, <Fr>	BAH	The sender from a business context, which can be different than the actual sender in the transport header (similar to MEOR in MT). BICFI is the preferred format. Please refer to appendix I for more details.	M	
To, <To>	BAH	The receiver from a business context, which can be different than the actual receiver in the transport header (similar to MERE in MT). BICFI is the preferred format. Please refer to appendix I for more details.	M	
BusinessMessageIdentifier, <BizMsgIdr>	BAH	The sender's unique ID/reference of the message	M	
MessageDefinitionIdentifier, <MsgDefIdr>	BAH	Contains the MessageIdentifier that defines the BusinessMessage, e.g. seev.048.001.01	M	
CreationDate, <CreDt>	BAH	Date and time, using ISONormalisedDateTime format	M	
Disclosure Response Identification, <DsclsrRspnId>	Document		M	
Issuer Disclosure Request Identification, <IssrDsclsrReqId>	Document		M	

Financial Instrument Identification, <FinInstrmId>	Document	ISIN is the preferred format	M	
Shareholders Disclosure Record Date, <ShrhldrsDsclsrRcrdDt>	Document	Date (YYYY-MM-DD) is the preferred format	M	
Responding Intermediary – Name, <Nm>	Document		M	
Responding Intermediary – Identification, <Id>	Document	LEI is the preferred format	M	

C. <u>Optional business data requirements</u>

The below optional elements may be provided in a Shareholders Identification Disclosure Response Cancellation Advice message but are optional. If used, they must be used as described in the "Detailed usage" column. It is to be noted that most of the usage rules are standards rules, not market practice recommendations.

Any other elements not mentioned above or below are considered NOT needed for this specific type of message. If used, they will be market-specific.

Common optional elements	Place	Detailed usage	M/C/O	SRD II reference
Related – From, <Fr>	BAH	Optional block in the BAH, for the related message: the sender from a business context, which can be different than the actual sender in the transport header (similar to MEOR in MT). BICFI is the preferred format	C*	
Related – To, <To>	BAH	Optional block in the BAH, for the related message: the receiver from a business context, which can be different than the actual receiver in the transport header (similar to MERE in MT). BICFI is the preferred format	C*	
Related – BusinessMessageIdentifier, <BizMsgIdr>	BAH	Optional block in the BAH, for the related message: the sender's unique ID/reference of the message	C*	
Related – MessageDefinitionIdentifier, <MsgDefIdr>	BAH	Optional block in the BAH, for the related message: contains the MessageIdentifier that defines the BusinessMessage, e.g. seev.047.001.xx	C*	

Related – CreationDate, <CreDt>	BAH	Optional block in the BAH, for the related message: date and time, using ISONormalisedDateTime format	C*	

C*: The block is optional, but if the block is included, the element is mandatory.

XI. Shareholders Identification Disclosure Response Status Advice

A. Scope

For the above-described different communication needs, the following business data are required. Focus is on the processes described in the MP:

B. Common mandatory business data requirements

The SMPG recommends that all the below optional and mandatory elements be present in all Shareholders Identification Disclosure Response Status Advice messages. M / C / O identifies whether the business data is mandatory, conditional or optional in the ISO 20022 standards.

Common mandatory elements	Place	Detailed usage	M/C/O	SRD II reference
From, <Fr>	BAH	The sender from a business context, which can be different from the actual sender in the transport header (similar to MEOR in MT). BICFI is the preferred format. Please refer to appendix I for more details.	M	
To, <To>	BAH	The receiver from a business context, which can be different from the actual receiver in the transport header (similar to MERE in MT). BICFI is the preferred format. Please refer to appendix I for more details.	M	
BusinessMessageIdentifier, <BizMsgIdr>	BAH	The sender's unique ID/reference of the message	M	
MessageDefinitionIdentifier, <MsgDefIdr>	BAH	Contains the MessageIdentifier that defines the BusinessMessage, e.g. seev.049.001.xx	M	
CreationDate, <CreDt>	BAH	Date and time, using ISONormalisedDateTime format	M	
Disclosure Response Identification, <DsclsrRspnId>	Document		M	
Issuer Disclosure Request Identification, <IssrDsclsrReqId>	Document		M	

Financial Instrument Identification, <FinInstrmId>	Document	ISIN is the preferred format	M	
Shareholders Disclosure Record Date, <ShrhldrsDsclsrRcrdDt>	Document	Date (YYYY-MM-DD) is the preferred format	M	
Responding Intermediary – Name, <Nm>	Document		M	
Responding Intermediary – Identification, <Id>	Document	LEI is the preferred format	M	
Response Reception Status, <RspnRcptnSts>	Document	It can only contain the status as "accepted" or "rejected". In case of a rejection, a rejection reason can be specified	M	

C. Optional business data requirements

The below optional elements may be provided in a Shareholders Identification Disclosure Response Status Advice message but are optional. If used, they must be used as described in the "Detailed usage" column. It is to be noted that most of the usage rules are standards rules, not market practice recommendations.

Any other elements not mentioned above or below are considered NOT needed for this specific type of message. If used, they will be market-specific.

Common optional elements	Place	Detailed usage	M/C/O	SRD II reference
Related – From, <Fr>	BAH	Optional block in the BAH, for the related message: the sender from a business context, which can be different from the actual sender in the transport header (similar to MEOR in MT). BICFI is the preferred format	C*	
Related – To, <To>	BAH	Optional block in the BAH, for the related message: the receiver from a business context, which can be different from the actual receiver in the transport header (similar to MERE in MT). BICFI is the preferred format	C*	
Related – BusinessMessageIdentifier, <BizMsgIdr>	BAH	Optional block in the BAH, for the related message: the sender's unique ID/reference of the message	C*	

Related – MessageDefinitionIdentifier, <MsgDefIdr>	BAH	Optional block in the BAH, for the related message: contains the MessageIdentifier that defines the BusinessMessage, e.g. seev.047.001.xx	C*	
Related – CreationDate, <CreDt>	BAH	Optional block in the BAH, for the related message: date and time, using ISONormalisedDateTime format	C*	

C*: The block is optional, but if the block is included, the element is mandatory.

XII. Securities Message Rejection

A. Scope.

The first intermediary sends the SecuritiesMessageRejection message to the sender (an issuer, its authorised agent or third party), to reject a previously received message on which action cannot be taken, like the sender doesn't comply with minimum requirements to allow processing at first intermediary level (for example for seev.045, seev.001, seev.031). The message should be used with the business Application Header.

XIII. Appendix I – Usage of From <Fr> and To <To> in the Business Application Header (BAH)

As a way of an example:

- issuer A uses third party α to issue shareholder identification requests and receive/consolidate all shareholder identification responses
- intermediary ABC outsource the processing of shareholder identification requests to provider XYZ
- issuer A sends a shareholder identification for the attention of intermediary ABC
- intermediary ABC provides shareholder details back to issuer A

Shareholder identification request

A seev.045 is issued by third party α to provider XYZ with the details of issuer A in From, <Fr> and the details of intermediary ABC in To, <To>

Shareholder identification response

A seev.047 is issued by to provider XYZ to third party α with the details of intermediary ABC in From, <Fr> and the details of issuer A in To, <To>

XIV. Appendix II – List of Applicable Laws

Please note that this table only provide certain applicable laws and it is not meant to be complete or exhaustive. Rightsholders and their intermediaries should take their own legal advice on the matter.

Country	Applicable Law
Ireland	Section 062 of the Companies Act 2014
UK	Section 493 of Companies Act 2006

XV. Appendix III – National client identifiers for natural persons

| 31.3.2017 | EN | Official Journal of the European Union | | L 87/477 |

ANNEX II

National client identifiers for natural persons to be used in transaction reports

ISO 3166 — 1 alpha 2	Country Name	1st priority identifier	2nd priority identifier	3rd priority identifier
AT	Austria	CONCAT		
BE	Belgium	Belgian National Number (Numéro de registre national — Rijksregisternummer)	CONCAT	
BG	Bulgaria	Bulgarian Personal Number	CONCAT	
CY	Cyprus	National Passport Number	CONCAT	
CZ	Czech Republic	National identification number (Rodné číslo)	Passport Number	CONCAT
DE	Germany	CONCAT		
DK	Denmark	Personal identity code 10 digits alphanumerical: DDMMYYXXXX	CONCAT	
EE	Estonia	Estonian Personal Identification Code (Isikukood)		
ES	Spain	Tax identification number (Código de identificación fiscal)		
FI	Finland	Personal identity code	CONCAT	
FR	France	CONCAT		

GB	United Kingdom	UK National Insurance number	CONCAT	
GR	Greece	10 DSS digit investor share	CONCAT	
HR	Croatia	Personal Identification Number (OIB — Osobni identifikacijski broj)	CONCAT	
HU	Hungary	CONCAT		
IE	Ireland	CONCAT		
IS	Iceland	Personal Identity Code (Kennitala)		
IT	Italy	Fiscal code (Codice fiscale)		
LI	Liechtenstein	National Passport Number	National Identity Card Number	CONCAT

| L 87/478 | EN | | Official Journal of the European Union | | 31.3.2017 |

ISO 3166 — 1 alpha 2	Country Name	1st priority identifier	2nd priority identifier	3rd priority identifier
LT	Lithuania	Personal code (Asmens kodas)	National Passport Number	CONCAT
LU	Luxembourg	CONCAT		
LV	Latvia	Personal code (Personas kods)	CONCAT	
MT	Malta	National Identification Number	National Passport Number	
NL	Netherlands	National Passport Number	National identity card number	CONCAT
NO	Norway	11 digit personal id (Foedselsnummer)	CONCAT	
PL	Poland	National Identification Number (PESEL)	Tax Number (Numer identyfikacji podatko-wej)	
PT	Portugal	Tax number (Número de Identificação Fiscal)	National Passport Number	CONCAT
RO	Romania	National Identification Number (Cod Numeric Personal)	National Passport Number	CONCAT
SE	Sweden	Personal identity number	CONCAT	
SI	Slovenia	Personal Identification Number (EMŠO: Enotna Matična Številka Občana)	CONCAT	
SK	Slovakia	Personal number (Rodné číslo)	National Passport Number	CONCAT
All other countries		**National Passport Number**	**CONCAT**	