Shareholders Identification Disclosure messages
Market Practice

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Changes to previous versions			

I. Introduction:

The amended Shareholders Rights Directive (EU) 2017/828 (hereinafter "SRD II") and Implementing Regulation (EU) 2018/1212 (hereinafter "SRD II IR") aim to encourage long-term shareholder engagement and to improve corporate governance in EU/EEA companies traded on EU/EEA regulated markets by enabling shareholders to exercise their voting rights and rights to information across borders. In SRD II, EU/EEA issuers of shares traded on regulated markets are also given the right to identify their shareholders. Exercise of this right confers obligations on intermediaries.

The market practice described in this document is based on SRD II and SRD II IR, as well as the Market Standards for Shareholder Identification produced by the Shareholder Identification Task Force.

As the SRD II IR is very specific and detailed on the data elements to be used, the SMPG would like to highlight that only the ISO 20022 messages designed for SRD II Shareholder Identification Disclosure listed in the scope and Definition section are compliant with the IR.

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.

II. Scope and definitions:

The scope of this document is to describe the market practice for using the Shareholders Identification Disclosure messages, as per SRD II and SRD II IR.

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.045.001.02
ShareholderIdentificationDisclosureRequestCancellationAdvice	SIDC	seev.046.001.01
ShareholderIdentificationDisclosureResponse	SIRE	seev.047.001.01
ShareholderIdentificationDisclosureResponseCancellationAdvice	SIRC	seev.048.001.01
ShareholderIdentificationDisclosureResponseStatusAdvice	SIRS	seev.049.001.01

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 are available on MyStandard at: https://www2.swift.com/mystandards/#/ISO20022?businessDomain=Securities in the "securities events" 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: https://www.iso20022.org/securities_messages.page under the "ShareholderIdentificationDisclosure" title.

III. Actors and Roles:

The main roles involved in this process:

1. Issuer

   The party that has issued the shares and is requesting the identity of its Shareholders.

   In the SRD II IR, the definition of issuer is: 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 that the issuer has delegated responsibility for receiving responses to the request. This is an optional role; the issuer may elect to receive responses itself. The issuer CSD can also act as the third party.

3. Issuer CSD

   The issuer CSD is the CSD in which the shares 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. The issuer CSD is in many markets the first intermediary, and it may also be the last intermediary, i.e. for a CSD member's proprietary account or for various types of end investors, in direct-holding markets.

   In the SRD II IR, the definition of issuer CSD is: the central securities depository which provides the core service as defined in points 1 or 2 of Section A of the Annex to Regulation (EU) No 909/2014 of the European Parliament and of the Council with respect to the shares traded on a regulated market.

   In the SRD II IR, the definition of first intermediary is: the issuer CSD or other intermediary nominated by the issuer, who maintains the share records of the issuer by book-entry at top tier level with respect to the shares traded on a regulated market or holds those shares at top tier level on behalf of the shareholders of the issuer.

4. 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.

5. 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.

IV. Activity Diagram:
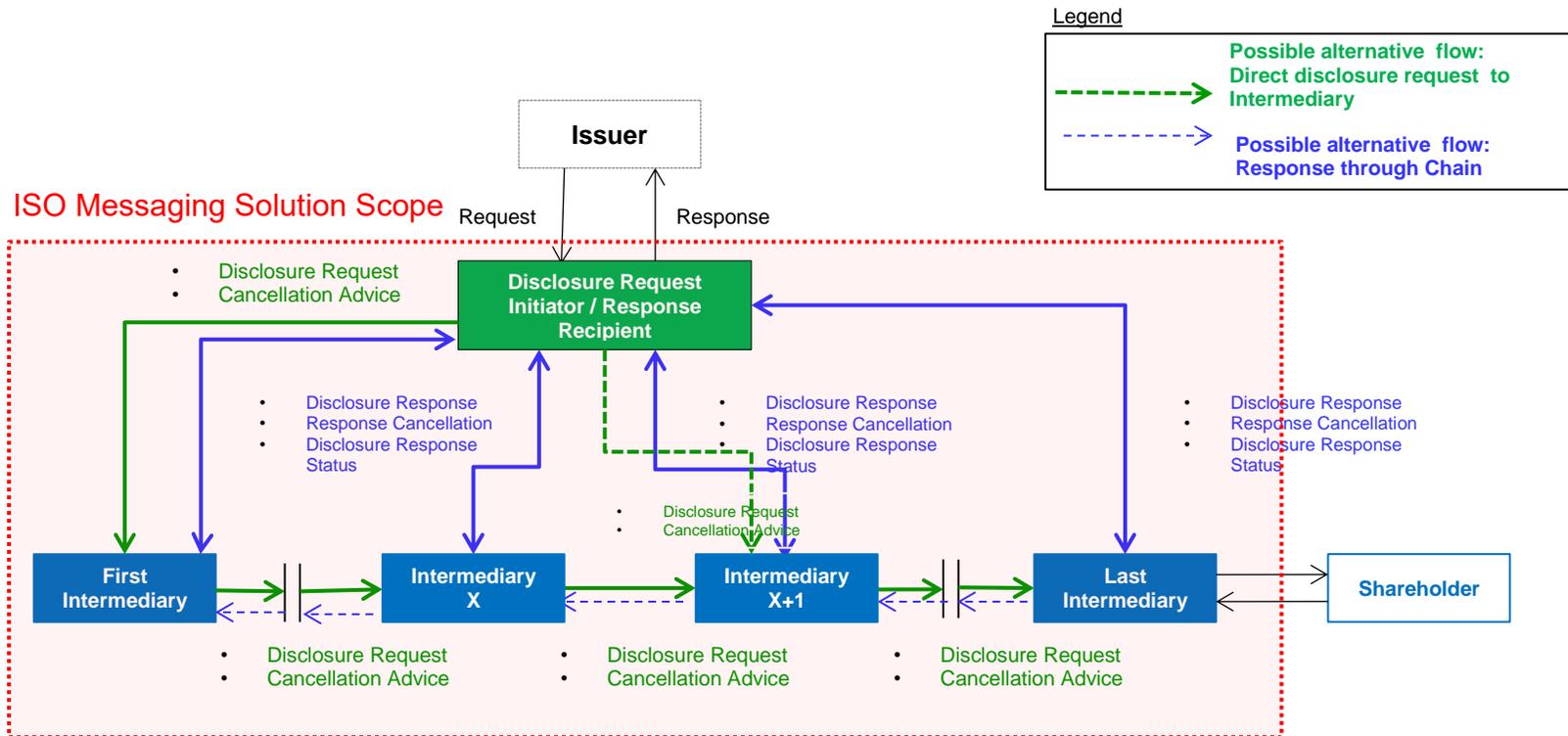
V. Message Flows illustrations:

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)

THE SHAREHOLDER IDENTIFICATION PROCESS IS HEAVILY IMPACTED BY THE LACK OF A COMMON SHAREHOLDER DEFINITION

In Member States where the shareholder is not considered the beneficial owner but the legal or registered owner, the sub-custodian will be able to send the information to identify the shareholder directly to the issuer/ local market infrastructure.
In Member States where the shareholder is the beneficial owner, the sub-custodian will transmit the request to the global custodian (i.e. along the chain of intermediaries, as appropriate), each intermediary will provide the details of its clients, whether intermediary or not. The intermediary that holds the information to identify the shareholder/beneficial owner will transmit it directly to the issuer or third party appointed by the issuer (e.g. local market infrastructure).

SHAREHOLDER IDENTIFICATION MESSAGE FLOWS

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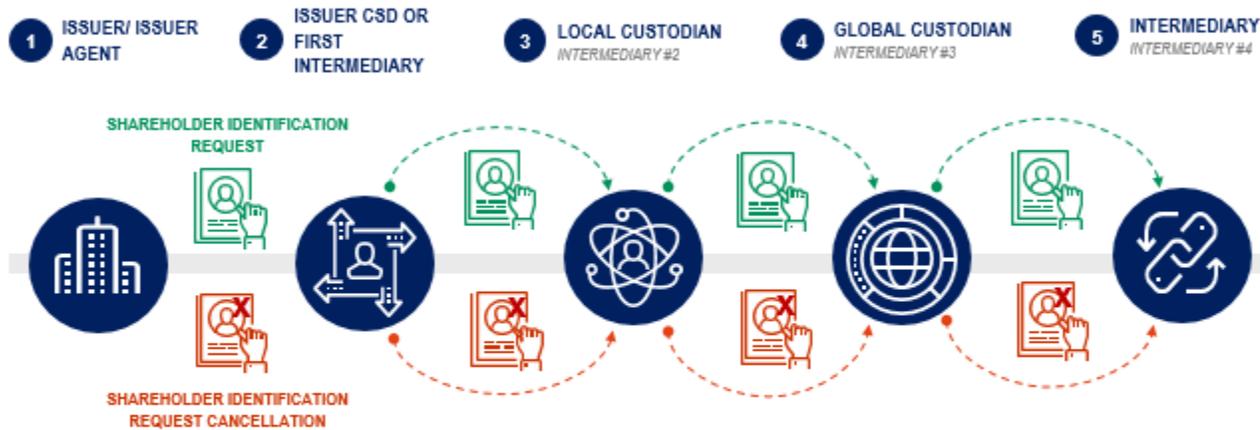
SHAREHOLDER IDENTIFICATION REQUEST

- 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 in the underlying security on record date (if record date is in the past) or any intermediary that has a holding or a pending transaction (if record date is in the future)

- 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

SHAREHOLDER IDENTIFICATION MESSAGE FLOWS

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

| 1 | ISSUER/ ISSUER AGENT/ THIRD PARTY | 2 | ISSUER CSD OR 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
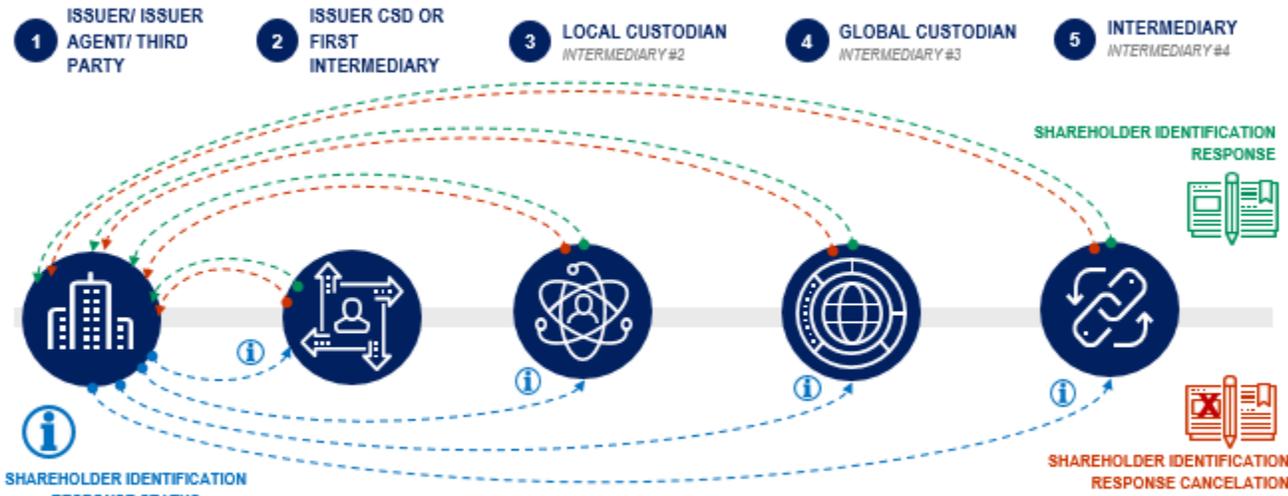
SHAREHOLDER IDENTIFICATION RESPONSE

- 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 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

SHAREHOLDER IDENTIFICATION MESSAGE FLOWS – EXCEPTIONAL FLOW

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

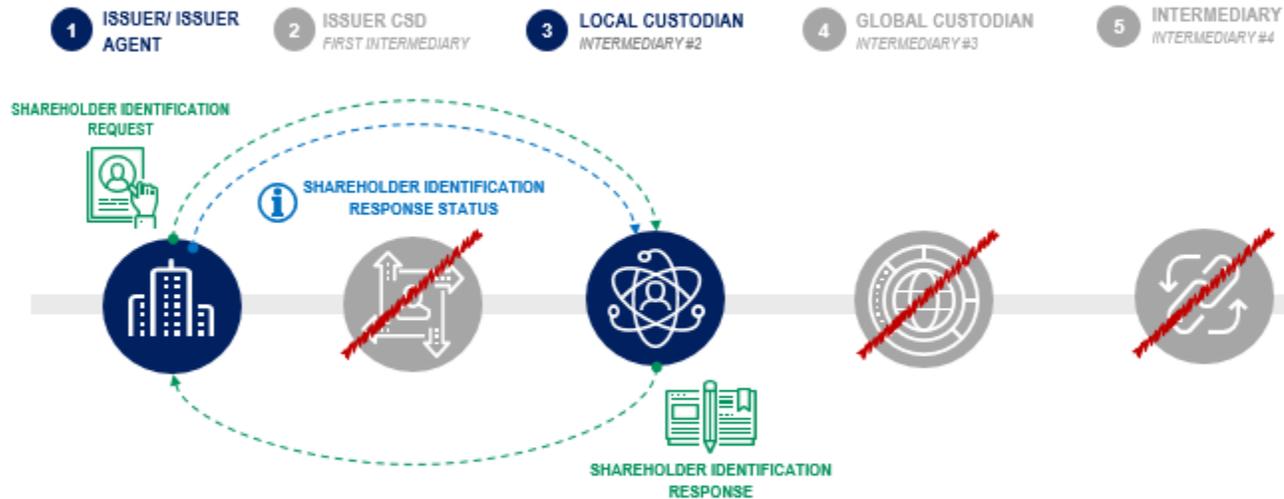**EXCEPTIONAL PROCESS - SHAREHOLDER IDENTIFICATION REQUEST AND RESPONSE**

- 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 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

SHAREHOLDER IDENTIFICATION RESPONSE – TYPE OF SHAREHOLDING

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

- ISSUER CSD SENDS 1 SHAREHOLDER ID REQUEST PER CSD PARTICIPANT
- In this example, CSD Participant 1 has a proprietary account at CSD along with a couple of clients' accounts (intended as accounts holding clients' assets). CSD Participant 2 only has clients' accounts.

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)

In this example, Client A is the beneficial owner of the assets held in its account. Client B has both a proprietary and a clients' account. Client C has not disclosed the nature of its account.

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)

In this example, Client C has comingled in its account with CSD Participant 1 its own proprietary assets with those of its clients.

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

VI. 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
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	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	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.045.001.01	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

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 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, the request is to be intended as in scope of SRDII 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	
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
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. If present, the issuer must also specify the method to be used to calculate the date and the description	O	Table 1 – A8
Date Calculation Method, <DtClctnMtd>	Document	Only to be used if the Request Share Held Date is present	C	
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	

Once received, it is recommended that each intermediary sends one request per downstream intermediary (N or U), as per their stated BIC/DN for the message type.

VII. 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 <u>in the ISO 20022 standards</u>.

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	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	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.	O	

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

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.045.001.01	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.

VIII. 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	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	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.047.001.01	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	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 – LEI is the preferred format. The first intermediary should use the Scheme field set to N/A in the Proprietary ID of the identifier.	M	Table 2 – B6
Shareholding Balance On Own Account, <ShrhldgBalOnOwnAcct>	Document	Quantity of securities held by the responding intermediary for its own account	M	Table 2 – B4
Shareholding Balance On Client Account, <ShrhldgBalOnClntAcct>	Document	Quantity of securities held by the responding intermediary on behalf of clients	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	M	Table 2 – B3
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 attachment	M	Table 2 – C1(b)
Shareholding Type, <ShrhldgTp>	Document		M	Table 2 – C10
Quantity, <Qty>	Document		M	Table 2 – C11

C. **Optional business data requirements.**

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
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	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	O	
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	C	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

IX. 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	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	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. **Optional business data requirements.**

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.047.001.01	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.

X. 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 than the actual sender in the transport header (similar to MEOR in MT). BICFI is the preferred format	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	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.049.001.01	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	
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. <u>Optional business data requirements.</u>

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 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	C*	

		different than the actual receiver in the transport header (similar to MERE in MT). BICFI is the preferred format		
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.047.001.01	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.