KELER's Depository Announcement -No. 9-19

On ISIN identifier issuance, deletion and the central register of securities

Effective from: 1 March 2022

Contents

1. Introduction

This Depository Announcement stipulates the detailed rules (procedural deadlines, fee payment terms, etc.) of the issuer services of KELER Central Depository Ltd. (hereinafter: **KELER, or Central Depository**) related to the issuing and registering of ISIN identifiers.

2. Terms used in this Depository Announcement

The terms used in this Depository Announcement comply with the terms used in the General Business Rules of KELER, unless defined otherwise in this depository announcement.

ISIN identifier	the term specified in Section 5 (1) 61 of Tpt., i.e. the series of letters or numbers or a combination thereof, issued by the central depository, serving the identification of securities conferring the same rights or of stock exchange products.
eISIN system Distributor	the organisation specified in Section 4 (1) 44 of Kbftv., i.e. cooperating in the marketing of collective investment securities, specified in Section 23 (1) of Tpt.
Restriction by the Issuer Demat event FB identifier	In case of mutual funds, the technical identifier issued by MNB instead of the issuer identifier, provided to KELER Ltd.

3. Legal background of the performance of the activity

As the central securities depository, KELER issues the ISIN codes and performs the central registry of the securities pursuant to Regulation (EU) No 909/2014 of the European Parliament and of the Council of 23 July 2014 on improving securities settlement in the European Union and on central securities depositories and amending Directives 98/26/EC and 2014/65/EU and Regulation (EU) No 236/2012 (hereinafter: CSDR), Act CXX of 2001 on the capital market (hereinafter: Tpt.), MNB Decree 20/2014 (VI.3.) (hereinafter: ISIN Decree), and Resolution no. H-EN-III-613/2020 of the Supervision Authority.

KELER, as the full member of ANNA (Association of National Numbering Agencies) and a national numbering agency (NNA) is the sole organisation in Hungary entitled to issue ISIN codes.

4. Scope of the issue of the ISIN identifier

KELER issues ISIN identifiers to securities issued in Hungary by domestic or foreign issuers, publicly or privately, in physical or in dematerialised form, issued in a series, as well as to other stock exchange products. KELER issues the ISIN identifier for those international bonds where the distributor is an entity registered in the Republic of Hungary.

Securities conferring the same rights, of the same face value and produced in the same manner constitute one series of securities. Securities belonging to one series have the same ISIN identifier.

The ISIN identifiers of securities belonging to one series and distributed later are different than the ISIN identifiers of securities distributed earlier, if

- securities distributed within one series but at a different time do not carry the same rights temporarily, or

- in the case of distributing securities belonging to a series of securities identical to a security already listed on a stock exchange, the listing on the same stock exchange of the securities distributed later does not take place at the same time as the distribution.

In addition to the above, the Issuer is required to apply for a new ISIN identifier

- for every individual series of securities,

- for each individual face value, i.e. if the given security was issued with several different face values (in case of physical securities with a higher denomination were not created by the merging of denominations),

- in the case of changes in face value, currency, the method of the production of the security, share class, etc., simultaneously with the termination of the ISIN identifier of the former series.

- In the case of securities to be issued in dematerialised form, if during the demat procedure KELER finds that the documents supporting the demat event and the securities data related to the ISIN identifier referred to in the event do not match. In this case, KELER may reject the demat event due to incorrect ISIN data provided at the time of application. In the case of rejection, the ISIN applied for with the wrong securities data must be deleted by the Issuer on the change notification form and the ISIN application (including payment of the fee) must be repeated with the correct securities data.

It is not required to apply for a new ISIN identifier in case of a change in issued total face value, in the data of the Issuer, in the expiry date or in the case of the termination of a series.

If the change is a consequence of the issuer's decision, the report shall be made and the necessary measures shall be taken following the registration of the decision by the company court in case of shares, while in case of other securities, without delay following the decision.

In case of dematerialised securities, the Issuer shall act in accordance with the provisions of the effective legal regulations, and shall give instructions concerning the issuing of the dematerialised securities within the frameworks of a Demat event and the recording of the changes in the dematerialised securities series.

5. The process of applying for an ISIN identifier

5.1 By a form

Pursuant to Annex 1 to the ISIN Decree, for each security type, the applicant may download the relevant form titled "Securities code (ISIN) application form" from the website of KELER (www.keler.hu). The applicant may deliver the completed application form, signed, scanned as PDF and sent to KELER to iktato@keler.hu.

A copy of the certificate of the bank on the payment of the processing fee must be attached to the application.

5.2 Electronically

The applicant may apply for the ISIN identifier electronically through the Internet-based application operated by KELER (hereinafter: eISIN), which is available on the website of www.keler.hu. Registration for the application is a precondition for the use of eISIN.

6. "Restriction by the Issuer" recorded in the eISIN application

The Issuer has the possibility to restrict the users entitled to act on its behalf by completing the form entitled "Reporting of restriction by the issuer in eISIN" available on KELER's website, by which it can prevent unauthorised persons from applying for ISIN identifiers on its behalf. The form shall be sent with authorised signature to the e-mail address iktato@keler.hu.

If the Issuer wishes to modify the scope of users, it may initiate this by making a new statement.

KELER sends a confirmation to the applicant on the setting of the user restriction, and the restriction becomes effective as of the 3rd business day following the receipt of the statement at the latest.

7. Process of the issue of the ISIN identifier

7.1 Handling of applications received in a printed form

Prior to the issue of the ISIN identifier, KELER will perform a formal check on the availability of the necessary documents.

After formal check, KELER will also perform a substance check for the details of the application in case of Shares, otherwise will not verify whether the data contained in the application are true.

If KELER has not found any formal or substance error in the check, it will record the indicated data in its register and issue the ISIN identifier for the given series of securities.

KELER will record the ISIN identifier together with the date of allocation in the section "To be filled in by KELER" of the form entitled "Datasheet for issuing securities code (ISIN identifier)", which it will send within 3 business days by e-mail in accordance with the form.

The final invoice of the processing fee related to issuing the ISIN identifier will be sent in accordance with the form.

In relation to mutual funds, related FB code of the Issuer fund will be sent to the applicant along with the ISIN form.

If in the checking of the form and substance of the application KELER finds that data are missing or any of the data are not applicable, then it will notify the applicant on the further necessary steps in a message sent to the e-mail address indicated on the application. If the payment of the processing fee of issuing the ISIN identifier was made simultaneously with the submission of the application, then KELER will issue an advance invoice, which it will settle with the final invoice to be issued after the issue of the ISIN identifier.

If the application was completed improperly, i.e.

- payment of the ISIN processing fee was not certified,

- the data necessary for the issue of the ISIN identifier were not fully provided,

- or the data indicated in the application are not applicable,

then the applicant is allowed to submit a new application with reference to the processing fee paid earlier, and the ISIN identifier may be issued with these data.

If the applicant fails to submit the requested documents within 90 days, then KELER will reject the original application, and therefore no ISIN identifier will be issued. It will inform the applicant on the rejection in writing, and if there is an advance invoice, then it will be cancelled and sent back, and the ISIN processing fee will be transferred back to the account of the applicant.

7.2 Handling of applications submitted electronically

The applicant may apply for an ISIN identifier electronically, on the system operated by KELER available on its website (www.keler.hu), through the eISIN application.

The applicant must have an individual e-mail address that must be registered in advance in the eISIN application.

After the submission of the application, the user has to pay the processing fee of the ISIN identifier electronically requested in the eISIN application: the user will be forwarded to the online payment site and has to pay the fee with bank card.

During the operating time of the eISIN application, the applicant may receive the requested ISIN identifier within 60 minutes, based on the data uploaded in the application.

After successful payment of the fee and the issue of the ISIN identifier, KELER will issue the final invoice on the processing fee. The serial number of the completed invoice will be also displayed on the eISIN application, among the data related to the order. The invoice will be issued and sent containing the data specified by the user.

The data sheet for the issued ISIN identifier can be downloaded via the application.

In relation to mutual funds related FB code will be sent separately to the e-mail address of the contact person after the successful issuance of ISIN identifier.

If the payment of the fee fails, then the application for the issue of the ISIN identifier will remain among the "Pending payment" items, and therefore the fee may also be paid at a later date. Without payment of the ISIN processing fee the application will not be delivered to the system generating the ISIN identifier, and therefore no ISIN identifier will be issued.

7.3 Contacts

a) If after 10 business days following the date of submission of an application on a form:

- the applicant has not received a notification on the ISIN identifier, then the applicant may inquire about the reason thereof at isin@keler.hu

- the applicant has not received an advance invoice or final invoice on the processing fee paid by it, then the applicant may inquire about the reason thereof by sending a mail to the e-mail address FKNYVELSG-1@keler.hu.

b) If, in the case of an application initiated through the eISIN application, after 1 business day:

- the applicant has not received a notification to their e-mail address on the completion of the generation of an ISIN identifier after the successful payment of the fee, or

- after the completion of payment the eISIN application does not confirm the ISIN identifier on the eISIN platform, then the applicant may inquire about the reason thereof at isin@keler.hu.

c) If after 3 business days the number of the final invoice issued on the payment of the processing fee is not displayed in the eISIN application, then the applicant may inquire about the reason thereof by sending a mail to the e-mail address FKNYVELSG-1@keler.hu.

d) If after 10 business days the applicant has not received a final invoice on the processing fee paid by it, then it may inquire about the reason thereof by sending a mail to the e-mail address FKNYVELSG-1@keler.hu.

8. The billing rules of the fee of issuing the ISIN identifier

The fee of the issue of the ISIN identifier is contained in the effective Fee Schedule of KELER.

In the case of an ISIN identifier requested on a form:

- an advance invoice may be issued on the processing fee paid in advance, as described above,

- the final invoice will be sent to the applicant in accordance with its instructions together with the confirmation of the ISIN identifier.

If the applicant does not give separate instructions concerning the details of the buyer to be indicated in the invoice, then KELER will automatically issue both the advance and the final invoice for the details of the Issuer.

In the case of an ISIN identifier requested through the eISIN application the invoice will be issued containing the data that can be specified on the interface of the application and will be mailed or sent to the applicant in accordance with its instructions.

9. Technical ISIN identifier

KELER generates technical ISIN identifiers on its own authority for the physical securities accepted in its Depository for individual deposit handling, not suitable for registering at the ISIN identifier indicated on the securities:

- the given security series was printed without ISIN identifiers,

- the ISIN identifier printed on the given securities is inactive in KELER's central security register,

- the face value of the given security has changed, which was indicated by the issuer by reprinting it on the security, and the issuer failed to apply for a new ISIN identifier for the new face value (in such case, the face value printed on the security and the registered face value are different)

- the ISIN identifier printed on the given security has a different face value in KELER's central security register than on the printed security

- the issuer applied for one single ISIN identifier for its securities series of various face values, but otherwise conferring the same rights.

The technical ISIN identifiers can be found in the list of ISIN identifiers published on KELER's website.

10. Central securities register

The central securities register contains data of securities issued in Hungary in a retrievable manner.

In the framework of the central securities registration activity, KELER keeps records of the following:

- the data of securities publicly issued in Hungary,

- in the case of printed debt securities, data on the method of interest payment, which the Issuer must specify in the additional form (Form 9) immediately after the issuance of the ISIN code. Following ISIN allocation, KELER will record the series as "variable interest rate" due to a lack of data until the Issuer provides appropriate information on the method of interest rate allocation.

- the data of dematerialised securities regarding which it has concluded a contract with the issuer for reporting.

In the List of ISIN identifiers on its website, KELER publishes, among other things, the following securities data and the data necessary to identify the Issuer:

- the category of the dematerialised security defined by the General Business Rules of KELER,

- in the case of dematerialised equities, any restriction on the transfer of the series of equities,

- in the case of dematerialised securities, indication of whether the security has been produced,

- in case of dematerialised securities, the FISN (Financial Instrument Short Name) code specified to the series

- CFI (Classification of Financial Instruments) code specified to the series.

Within 5 days following the date of the change the Issuer has to report to KELER as central securities depository any changes in the data of the series of securities or in the data of the Issuer.

Since data are recorded according to the reports of the Issuer, therefore KELER shall not be held liable if the data kept on record are no longer valid.

KELER is entitled and obliged to report data kept in its registry, both within Hungary and to foreign countries.

It is important for every market participant to update the securities data reported to KELER, with special regard to changes in the name of the Issuer, in the registered office of the Issuer, changes in the face value of the issued securities, conversion or termination of the series of securities.

10.1 Procedure in the case of changes in data

If such changes occur in the group of the data specified in the application for the ISIN identifier that do not result in the issue of a new ISIN identifier (e.g. change of the issued volume, change in the data of the Issuer, change in the manner of distribution, etc.), then the report may be made in the following ways:

- in the case of physical securities or securities to be produced as dematerialised securities, on the form titled " form to report change to the central security register" (form no. 1),

- In the case of dematerialised securities, the changed data will be recorded in the central securities register only simultaneously with the completion of the process of dematerialisation, automatically.

The applicant may send the completed, originally signed and scanned application as a .pdf file to KELER to the e-mail address iktato@keler.hu.

The issuer may send the officially signed form titled "Form to report change to the central security register" (form no. 1) to KELER, in the original counterpart or as an electronic document to the e-mail address iktato@keler.hu. KELER will confirm to the applicant that the data have been updated on the form sent by the sender, attached to the e-mail.

10.2 Process in the case of the termination of an ISIN identifier

KELER will never delete an ISIN identifier from the central register of securities, it will only set the status of the ISIN identifier to inactive, i.e. it will continue to include it in the central securities register, thereby ensuring that the register is complete.

The process of cancellation of an ISIN identifier is the following:

- Based on the instruction of the issuer:

- o In the case of a series of physical securities and in the case of a series of securities instructed to be produced in a dematerialised manner, KELER will set the ISIN identifier of the series to inactive based on the form titled "form to report change to the central security register" (form no. 1). KELER will not notify the issuer on the fact of the cancellation directly, the issuer may obtain this information from the website of KELER (https://www.keler.hu/isin/).

- o Simultaneously with the cancellation of dematerialised securities recorded on central securities accounts, the ISIN identifiers of series of securities with or without maturity are set to inactive status. KELER does not notify the issuer on the termination of the ISIN identifier, it only confirms cancellation from the securities accounts.

- Based on the report of the Magyar Nemzeti Bank (hereinafter: Supervision):

  - o KELER will set the ISIN identifier of the relevant security to inactive if the Supervision has adopted a resolution on the termination of the given security, or if the Supervision has rejected to permit the issue of the security. The Supervision will always notify KELER on the rejection of permission for a particular issue. KELER will notify the issuer on the termination of the ISIN identifier - simultaneously with sending a copy of the resolution of the Supervision - within 3 business days. These ISIN identifiers will not be reissued either.

- On its own authority, KELER will:

- After the maturity date of securities with a maturity and ordered to be produced in a dematerialised manner or in physical form, KELER will automatically cancel the ISIN identifier even if no such notification was received from the issuer. The ISIN identifier of securities produced in physical form will not be deleted automatically.

- In the case of securities with no maturity date, ordered to be produced in a dematerialised manner, and physical securities that were not deposited in the central depository, if KELER learns that the court of registration cancelled the issuer of the given security from the company registry conclusively, without recording a legal successor, the ISIN identifier of the series will be deleted automatically.

- The issuer of the series of printed securities with no maturity dates which are in the custody of KELER, if the company court has deleted them from the company register without registration of a legal successor, will be deleted from the register after the destruction of the securities held in custody.

11. Provision of information on ISIN identifiers

KELER maintains a registry on the issued ISIN identifiers. This registry is accessible for anyone on the website of KELER (https://english.keler.hu/isin/) and is updated by KELER on a daily basis.

According to the relevant statutory obligations, KELER regularly provides data about the ISIN identifiers issued by it to the MNB, the Supervision and to ANNA (Association of National Numbering Agencies).

ANNA makes available the ISIN data reported by KELER in a publicly available database or within the frameworks of private data sale activity to third parties.

Budapest, xx.xx.2022

KELER Ltd.
Corporate Actions and Issuer Services Department