KELER – Depository Announcement No 9 - 04

Services provided for Hungarian corporate events

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1. General information

1.1. Introduction

This document provides information to the Clients of KELER Zrt. (hereinafter referred to as "KELER"), as the central securities depository, regarding certain additional services provided by KELER Zrt. (hereinafter referred to as "KELER"), as the central securities depository, in respect of securities issued in Hungary (identified by an ISIN code starting with HU) and registered in central securities accounts held with KELER, in relation to the corporate events related thereto. The Client is the legal entity in a contractual relationship when using the services defined in the General Business Rules. The present document specifies the activities concerning the Issuer and/or the Securities Account Manager, so that these designations are used in the document where they apply to them, and the term Client is used where both parties are involved. A full list of the additional services provided by KELER to the Issuer in connection with the certification services is set out in the General Terms and Conditions of KELER. Terms used in the Securities Note shall have the same meaning as defined in the GTC.

The range of additional services provided by KELER

In connection with the corporate events carried out at the request of the Issuer in relation to the securities registered by it, KELER supports the exercisability of the rights contained in the securities by providing the following services.

1.1.1. Ancillary services relating to corporate events entailing payment (chapter 2)

● Ownership identification procedure for share-related payments (e.g. dividend payments, advance dividend payments, capital payments),

● Ownership identification procedure for payments related to debt securities (e.g. interest payments, principal repayments, redemptions, repurchases, maturity interest and principal payments)

● Ownership identification procedure for unit-linked payments (yield payments, payments upon maturity and principal repayments)

1.1.2. Services relating to corporate events not involving payment (chapter 2)

● Ownership identification procedure related to the General Meeting

● Updating the Register of Shareholders

● Ownership identification procedure for investment fund conversions

1.1.3. Retrospective ownership identification procedure (Chapter 3)

● Retrospective ownership identification procedure ordered by the issuer or the issuer's representative for an earlier record date.

● Retrospective ownership identification procedure ordered by the competent authority in the framework of an official (MNB) procedure, for an earlier record date.

1.1.4. Payment instruction by event (Chapter 4)

A document provided to the Issuer in connection with a corporate event with a payment event, which contains, for a given record date and in a given currency, the aggregate amount of securities registered in the central securities accounts of the Account Holders, supplemented by the payment accounts specified on the basis of the Account Holder's declarations, to which the amount due at the corporate event with a payment event is to be allocated.

1.2. General rules

1.2.1. Ordering procedure

The Issuer or the Issuer's representative may submit the order for the Ownership identification procedure or the payment instruction to KELER by e-mail or by post using the form available on the KELER website (www.keler.hu). Further rules on how to place an order are set out in the event chapters.

As of 12 April 2022, due to the sanctions measures resulting from the Russian war, KELER requests Issuers to fill in a so-called "Sanction KYC" (Know Your Client) declaration form, signed by the authorised signatories, in original, in order to ensure the smooth of its services. In the absence of the declaration or in the event of sanctioning, the client will be denied the services of KELER Zrt.

KELER Zrt., as an organisation subject to the Pmt., operates a sanction filtering system. In the case of dividend payments made by KELER Zrt. as the paying agent, if a transaction is identified in the sanctions filter due to a match with the filter list, it will be subject to investigation under the applicable legislation. If the information received in connection with the payment is insufficient, the payment of dividends to the beneficiary shareholders in connection with the payment may be withheld until the information is obtained by the securities account manager and the investigation is completed, until the information and documentation necessary to ensure payment is available. KELER Zrt. shall not be liable for any damages resulting from delays in fulfilling its statutory obligations.

1.2.2. Date of ordering

The event order must be submitted to KELER no later than the deadline for submission of the event order, depending on the type of event and security.

- for shares: Record date -3 business days (Section 2.2.3)
- for debt securities: Record date -3 business days (Section 2.3.1)
- for investment units: Record date -3 business days (Sections 2.4.1 and 2.4.3)

In case the Issuer executes the order on Record date -2, Record date -1 or Record date 2, the urgency fee will be charged in accordance with the applicable KELER Fee Schedules.

Record date: whoever owns the security at the end of Record date is entitled to exercise the rights relating to that maturity date

1.2.3. Client's identity, signature

The order can be signed and accepted as follows:

In the case of signature by the Issuer or the Issuer's authorised representative, by indicating the name and authentic signature of the person authorised to sign for the company or represent the company, and by sending the original signature and the power of attorney. The signature may be replaced by an electronic signature (in es3 format) on the order form.

Sending the original signature specimen by post may be replaced by sending it in an es3 file with a qualified electronic signature and a time stamp of the lawyer or notary who prepared or countersigned the document.

1.2.4. Completing the order form

The order form must always be completed in full.

2. Ownership identification procedure

2.1. General provisions on corporate events at the request of the Issuer

KELER shall inform the securities account holders of any corporate event that may be carried out in accordance with these Rules via the KID system.

If a corporate event cannot be carried out in accordance with these Rules, KELER shall also publish in the KID system the mandatory procedures to be followed, as agreed with the Issuer.

When calculating the event days, KELER takes business days into account. The record date for corporate events and related Ownership identification procedure announced for securities listed on

the Budapest Stock Exchange may be ordered on BSE business days.

The Ownership identification procedure requested by the Issuer relates to the total amount of securities managed by CRA as at the Record Date.

The securities account manager shall provide ownership information to KELER in respect of the amount of securities under its control.

The accuracy and completeness of shareholder data obtained during the Ownership identification procedure is the full responsibility of the securities account manager. KELER Zrt. shall not be liable if the shareholder is unable to exercise his/her rights in relation to the security or is only able to exercise them in part due to incorrect or incomplete data.

Any damage resulting from the failure to provide a payment reference number or payment account number shall be borne by the securities account holder.

The book-keeping rules may differ for each Issuer. It is the responsibility of the Issuer to draw the shareholder's attention to the specific rules of the relevant share register, including the provisions of KELER.

2.2. **Ownership identification procedure** for shares

2.2.1. General rules

The Issuer of all publicly traded shares is obliged to request an **ownership identification procedure** from KELER in case of a corporate event involving a payment (dividend payment, payment of dividend advance and interest payment in case of interest-bearing shares).

For all corporate events involving ownership identification procedure, the securities account manager may provide KELER with the details of security holders wishing to enforce their rights against the Issuer through the KID system by 3.00 p.m. on the day of collection of shareholders' data at the latest. The data shall be transmitted in the format and with the content specified by KELER. The date of the collection of shareholder data will be announced by KELER in the KID system under *Announcements/KELER Information/Corporate Events and Securities Information*.

2.2.2. Notice of a corporate event

The Issuer is required to notify KELER of any corporate event immediately after the decision on the corporate event has been taken, but no later than the third settlement day prior to the record date of the corporate event, and to order the **ownership identification procedure**. If the Issuer fails to comply with this obligation or is late in doing so, the KELER shall not be liable for any damages resulting therefrom.

Record date: whoever owns the security at the end of that day is entitled to exercise the rights relating to that maturity date.

2.2.3. Important days of corporate events

The following days are considered important days for the purposes of conducting a corporate event related to shares:

- Record date -3 business days: the last day for sending the order for a corporate event order to KELER. If the Issuer fails to comply with this obligation or is late in doing so, KELER shall not be liable for any damages resulting therefrom. *(If the Issuer executes the order on Record date -2, Record date -1 or Record date 1, the urgency fee shall be charged in accordance with the applicable KELER Fee Schedules.)*
- E-7 day (cum date): in the case of shares listed on the BSE, the last trading day on which the sale takes place together with the shareholder's rights attached to the corporate event specified by the issuer.
- E-6 day (ex-date): in the case of shares listed on the on BSE, the first day of trading without the right to participate in a corporate event as determined by the issuer.
- E-5 day (record date) is the record date: the shareholder who owns the share at the end of this day is entitled to exercise his/her shareholder's rights. This is the last day on which a share with a coupon due may be delivered.

  In the case of shares produced by printing, if the delivery is made with the coupon due after the record date, KELER will cut and return the coupon as a chargeable service.
- Day E-4: the date of transmission of the shareholders' data to KELER. The shareholder data must be submitted to the KELER according to the provisions of the "Depository Announcement on the Deadline for Receipt and Execution and Cancellation of Orders".
- Day E-2: Delivery to the Issuer or its representative of the Ownership identification procedure (and, in the case of a corporate event involving a distribution, the distribution order).
- "E day" (event date): the date of the corporate event.

The Issuer may propose a different procedural regime. The different procedure concerns the setting of the record date. The order deadline shall be the third business day preceding the record date thus specified.

2.2.4. Processing the shares subject to **Ownership identification procedure**

The processing of the files received on the KID is continuous until 15:00 on the day of collection of owners data. In the case of erroneous records, KELER will notify the reason for the error via the KID (Company events/Company event notice). In the case of an incorrect file, the submitted package must be deleted in the KID (New Order/Company Events/Delete TMT Ownership identification procedure) and the corrected file must be resubmitted.

All data must be received by KELER by 15.00 on day E-4, including the data already corrected by the securities account manager.

If no file or an incorrect file is received by KELER by 15.00 on day E-4, KELER will notify the data subjects of the inability to process the shareholder's data provided via the KID. In this case, the securities account manager may transmit the shareholder's data directly to the Issuer or the Issuer's authorised representative.

2.2.5. Allocation

In the case of dematerialised and printed shares, KELER will only make an allocation based on the number of denomination unit.

The number of denomination units allocated to each shareholder will be delivered to the Issuer or its authorised representative by e-mail on day E-2 in electronically signed (.es3) format

In the case of unidentified positions, KELER displays the aggregated position without name, which is marked as unidentified.

2.2.6. **Ownership identification procedure** for dividend payments made by KELER (as paying agent)

For all **Ownership identification procedure**, correct data transmission is expected from securities account holders. For all **Ownership identification procedure**, the name and details of the shareholder as stated in the shareholder's ID document must be provided. If an account is blocked or has any other status, or if the shareholder is deceased, the securities account manager must mark these in its system so that they remain the same as the shareholder's personal details on the documents.

If a dividend payment has been withheld due to incomplete or incorrect information provided by the shareholder's securities account holder, the securities account holder can subsequently provide the corrected shareholder information in a so-called supplementary procedure via the KID system. KELER shall not be liable for incorrect data provided by account holders. KELER is not in a position to accept corrections sent outside the KID system.

The securities account manager shall provide KELER in advance with the payment reference number or cash account number to which it requests all payments relating to corporate events involving payments. KELER will display the account number so provided to the Issuer in the payment order. If the securities account holder does not have one, KELER will provide the Issuer with the securities account holder's deposit account with KELER for transfers relating to corporate events involving payments.

2.3. Ownership identification procedure for debt securities

For debt securities managed by KELER, KELER participates in the settlement of payments when due (interest payments, principal repayments, interest payments and principal repayments, maturity payments) and performs **Ownership identification procedure** on behalf of the Issuer.

2.3.1. Important days for corporate events

- Record date -3 business days: the last day for sending the request for **Ownership identification procedure** and payment order to KELER. If the Issuer fails to comply with this obligation or is late in doing so, KELER shall not be liable for any damages resulting therefrom. *(If the Issuer executes the order on Record date -2, Record date -1 or Record date, an urgency fee shall be charged in accordance with the applicable KELER Fee Schedules.)*
- E-4 day (cum date): in the case of a debt security listed on the on BSE, the last trading day on which trading takes place together with the right to trade on the maturity date.
- E-3 day (ex-date): in the case of a debt security listed on BSE, the first trading day on which trading takes place without the right to the maturity date.
- E-2 day record date: the person entitled to receive the payment on the due date, or the person whose account the security appears on at the end of that day, is registered as the holder. Accordingly, it is possible to carry out operations in the accounts relating to debt securities until the close of the relevant settlement date, with the intention of participating in the relevant event.
- Day E-1: On this day, securities account holders are required to submit shareholder's data on **Ownership identification procedure** to KELER as specified in the "Depository Announcement on the Deadline for Receipt and Execution and Cancellation of Orders ".

  On day E-1, KELER shall provide the Issuer with the **payment instruction**, which shall also contain, broken down by securities account holder, the payment reference number or cash account number to which the securities account holder has previously provided the **payment instruction** on the form provided for this purpose.
- On the E-Day, KELER will provide the Issuer with the Ownership identification procedure, if the Issuer has requested KELER to perform it.
- "E-date" (event date): the date of payment or the date of registration of holders by the Issuer.

The Issuer may propose a different procedure from the above, but it may not set a shorter period. The different procedural regime concerns the setting of the record date. The order deadline is the third business day preceding the record date thus specified.

2.4. Ownership identification procedure for investment units

In the case of the investment units managed by it, KELER participates in the payments related to the events (payment of yield and yield advance, capital redemption, fund maturity, fund conversion) on the basis of a written order from the Issuer (in this case the Fund Manager).

2.4.1. Important dates for payments due during the term or before maturity

Priority dates for due dates:

- Record date -3 business days: the last day for sending the request for Ownership identification procedure and payment order to KELER. If the Issuer fails to comply with this obligation or is late in doing so, KELER shall not be liable for any damage resulting therefrom. *(If the Issuer executes the order on Record date -2, Record date -1 or on the Record date, an urgency fee shall be charged in accordance with the applicable KELER Fee Schedules.)*
- E-5 day (cum date): in the case of an investment unit listed on BSE, the last trading day on which trading takes place together with the right to trade on the due date.
- E-3 is the record date: the person entitled to receive the payment on the due date, or registered as the holder, or entitled to receive the payment of the yield and the advance on the due date, will be the persons having the investment units in their securities account at the end of this day. Accordingly, until the close of the settlement date, it will still be possible to carry out account operations with the investment unit in the securities accounts, with the right to do so relating to the due date.
- Day E-2: On this day, securities account holders are required to submit shareholder's data in the course of the Ownership identification procedure to KELER as specified in the "Depository Announcement on the Deadline for Receipt and Execution and Cancellation of Orders ".
  On day E-2, KELER shall provide the Issuer with the payment instruction, which shall contain the daily closing account balances by Client and the payment reference numbers or account numbers provided by the Client to which the due transfers are requested to be made.
- Day E-1: Upon request, KELER will provide the Issuer with the data required for the Ownership identification procedure.
- "E-date" (event date): the date of payment or the date of registration of holders by the Issuer.

The Issuer may propose a different procedure from the above, but it may not set a shorter deadline. The different procedure concerns the setting of the record date. The order deadline is the third business day preceding the record date thus specified.

2.4.2. Maturity management of units issued by a closed-end investment fund

The maturity (day AE) of the closed-end investment units and the payment (day E) on this unit are separate. The maturity of the investment units does not imply the automatic cancellation of the unit at maturity.

2.4.3. Important dates regarding the maturity of investment units

Upon maturity of the investment units, and unless the Manager has made a statement to the contrary to the KELER, no account transactions may be carried out with the units until their cancellation.

- Day AE-15: Declaration of the fund manager
  a) the exact date of payment (day E) and the record date,
  b) the possible extension or conversion of the investment fund at maturity,
  c) whether account operations may be carried out between day AE-6 and day E-3 with units of an expired investment units.
- Record date - 3 business days: deadline for sending the request for Ownership identification procedure and payment instruction to KELER. *(If the Fund Manager executes the order on Record date -2, Record date -1 or on the Record date, an urgency fee will be charged in accordance with the applicable KELER Fee Schedules.)*
- AE-5 day (cum date): in the case of a unit listed on the on BSE, the last trading day related to the maturity payment of the yield and the principal payment on which trading takes place together with the right to the maturity payment.
- Day AE-4: If the fund manager has declared the conversion of a closed-end fund to an open-end fund, the registration of the conversion data for the fund's maturity date, ensuring the continuous marketing of the unit from the record date to the maturity date of the fund.
- AE-3 day: the record date related to the maturity date of the investment unit. From this day until the payment date set by the fund manager (day E), the investment unit may not carry out any account transactions on the expiring unit unless the fund manager has stated otherwise.
- AE-date: The date of expiry or conversion of the fund.
- E-3 record date: The person who is entitled to receive the payment on the due date, or is registered as the holder will be the person who has the unit on his/her securities account at the end of this day. Accordingly, until the close of the settlement date, it is still possible to carry out account operations with the investment unit in the securities accounts, with the right to do so relating to the due date.
- Day E-2: On this day, securities account holders are required to submit ownership information to KELER upon a request for Ownership identification procedure, as specified in the "Depository Announcement on the Deadline for Receipt and Execution and Cancellation of Orders ".
- On day E-2, KELER will provide the fund manager with the payment instruction, which will include the closing account balances as of the closing date, broken down by client, and the payment reference numbers or account numbers provided by the client to which the transfers due are requested to be made.
- Day E-1: KELER will provide the fund manager with data required for the Ownership identification procedure if it has requested KELER to perform it.

- "E-date" (event date): the date of payment or the date of registration of holders by the Issuer.

KELER shall not be liable for any loss or damage caused by the failure or delay of the Fund Manager to comply with its obligations under the above Sections.

3. Retrospective ownership identification procedure

In the case of dematerialised securities, retrospective ownership identification procedure will be carried out by KELER on the basis of a decision of the Supervisory Authority or a written order of the Issuer. Retrospective ownership identification procedure are reported by KELER through the KID system.

If a securities main account has been closed since the date of the retroactive record date, KELER will request shareholder's data in an Excel file with the same data content as the txt file to be submitted to the KID, sent by email to kelertesem@keler.hu.

In the case of a closed sub-account, the account holder can notify the technical temporary reopening of the sub-account at kelertesem@keler.hu during the Ownership identification procedure. Once the data has been submitted, the sub-account will be closed again. No transactions may be carried out on the sub-account that has been reopened during this period.

Retrospective ownership identification procedure can only be requested from the date after the amendment to the Capital Market Act entered into force on 01 July 2006, for the date of the event starting on the date after that date.

3.1. Retroactive Ownership identification procedure based on the decision of the Supervisory Authority

A retroactive Ownership identification procedure may be carried out on the basis of a decision of the Supervisory Authority, which shall be carried out on the date and for the data in effect as specified in the decision of the Supervisory Authority.

The securities account manager is required to provide the CSD with the identification data and the number of securities of the shareholders who hold the dematerialised securities specified in the decision on the date of the Ownership identification procedure (record date).

KELER performs the Ownership identification procedure on the data provided by the securities account holders within the deadline set by KELER.

3.2. Retroactive Ownership identification procedure upon the Issuer's request

If the Ownership identification procedure is carried out upon the request by the Issuer or the Issuer's authorised representative, the securities account manager shall provide KELER with the identification data and the number of securities of the shareholders who, on the date (record date) specified in the Issuer's request for Ownership identification procedure, hold the dematerialised

securities specified therein and, in the case of a public limited company, have not requested that their registration in the share register be prohibited or did not request their cancellation.

3.3. Ordering retrospective ownership identification procedure

You can order retroactive Ownership identification procedure by completing the form "Order for retroactive Ownership identification procedure" (Exception: Retroactive Ownership identification procedure ordered on the basis of a supervisory decision.)

KELER undertakes to carry out the retrospective ownership identification procedure at the earliest on the third business day after the order has been place. If the Issuer requests the retrospective ownership identification procedure to be carried out within three business days of the order, an urgency fee shall be charged in accordance with the applicable KELER Fee Schedules. The completion, signature and submission of the order form shall be governed by the provisions of Section 1.3 of this document.

4. Payment instruction

The Issuer or the Issuer's authorised representative may request from KELER a list of payment instruction for corporate events involving a payment.

Account holder declaration

The Client shall indicate to the KELER, on the form entitled 'Order for the bank account numbers assigned to the corporate event with payment', the proprietary bank account numbers per security and currency to which the crediting of the corporate event with payment is requested. KELER will display these account numbers in the payment instruction on the Issuer's order.

If the Client does not specify a bank account number to be credited or the provided account number is not active, any damage resulting from the absence or inadequacy of the account number shall be borne by the Client. In order to facilitate the safe management of corporate events, on a risk-sensitive basis, KELER is entitled to request confirmation of the existence of external account numbers reported by the Client, which the Client shall provide by means of an account agreement or account statement. If KELER acts as Paying Agent on behalf of the Issuer for the corporate event giving rise to the payment and, at the time of crediting the entitlement, determines that the Client has not specified a payment account number or does not have an appropriate payment account number, KELER may automatically open a restricted Deposit Account for the Client in the currency of the entitlement to which the payment due will be credited. The Client's right to dispose of the automatically opened account is activated after the successful completion of the due diligence required for opening the account in accordance with the Anti Money Laundering Act and after signing the account agreement. The Client may only use this account in accordance with the provisions on the proper use of the account as set out in the General Business Rules and the contractual restrictions.

Any damage resulting from the failure to provide the payment reference number shall be borne by the Client.

4.1. Ordering a payment instruction

When ordering the payment instruction, the Issuer or the Issuer's authorised representative must take into account the following:

4.1.1. How to order

The Issuer or the Issuer's authorised representative may submit the order for the Ownership identification procedure or the payment instruction to KELER using the form available on KELER's website, by e-mail or by post.

4.1.2. Date of the order

The order for the event shall be submitted to KELER no later than the third business day prior to the Record date of the event (Record date -3 business day). If the Issuer executes the order on Record date 2, Record date -1 or on the Record date, an urgency fee will be charged in accordance with the applicable KELER Fee Schedules.

4.1.3. Client's identity, signature

The order will be accepted only by the Issuer or the Issuer's authorised representative, provided that the name and authentic signature of the person authorised to register the company or represent the company is indicated. The signature may be replaced by sending an electronically signed copy of the order form (es3 format) by e-mail.

4.1.4. Completion of the order

The order form must always be completed in full.

4.1.5. Sending the payment instruction list

The payment instruciton list is prepared on the business day following the day of the event. The list shall be in the form specified by the Issuer or the Issuer's authorised representative in the Ordering Document.

5. Services related to the provisions of the Shareholders Rights Directive II (SRD II) (related to the provisions of the Htr. tv.[1])

KELER uses the CAPS system as an intermediary for services related to the provisions of the Htr. The CAPS system connects the Issuers of exchange traded securities with the securities account managers of the shareholders.

All corporate events announced through other disclosure channels in CAPS will be recorded simultaneously by the Issuer in order to notify the final shareholders through the relevant Preferred Final Beneficiaries. The CAPS system cannot be used without an LEI code.

The CAPS system interface can be accessed via a suitable internet browser at the following address: https://caps.keler.hu/caps/.

To use the system, it is necessary to have a contract for the use theref: (https://www.keler.hu/Dokumentumtár/Formaszerződések/tabs/Formaszerződések/(37.%20p.%20CAPS%20system%20service%20contract/2020_09_03_KELER-37_CAPS-system-service-codes.pdf?download).

Within the framework of the conclusion of the contract, KELER shall verify the right of representation of the person(s) representing the Issuer or the Prepaid Securities Account Manager and the adequacy of their signatures, therefore, if the documents required for identification are not available to KELER or have not been presented during the use of other services of KELER, the Client shall provide credible evidence thereof.

The Issuer can give notice of events to Account Managers by recording them in the CAPS system. The purpose of the CAPS system is to ensure compliance with the Htr by KELER. Events may also require the ordering of Demat events, payment instruction, shareholder's identification procedure or other events. The ordering of an event may be done outside the use of the CAPS system as specified in this Depository Announcement.

In CAPS, the Issuer completes a template to provide information on the current corporate event. When completing the template, the type of event, the ISIN code of the relevant security and details specific to the event must be specified. The system marks the fields that are essential for the notice and those that are necessary to complete an event.

The range, format and requirements of the types of messages that can be submitted and received are published by KELER in the SRD sub-group within the KELER group on the SWIFT MyStandards platform.

[1] Act LXVII of 2019 on the promotion of long-term shareholder engagement and amending certain acts for the purpose of legal harmonisation

The KELER CAPS system provides a link between Issuers and securities account holders in the following cases:

- To support the organisation of general meetings
  - uniform general meeting notice,
  - confirmation of the right to attend the general meeting,
  - publication of the resolutions of the general meeting
  - confirmation of votes
- Notice of corporate events - for events other than a general meeting.

KELER will provide shareholder's data for the balance of the "Own" sub-accounts registered with it (the accounts of the final investors), for the "Cliet" sub-accounts it will provide the intermediary's details and forward the corporate event information/shareholder identification requests to the holders of securities accounts with KELER who have a balance of the security in question. In accordance with the Htr. act, requests may also be received through intermediaries who do not have any direct account relationship with KELER, but have been commissioned by the Issuer to collect shareholder identification.

Performs the task	Posted on
Issuer	→Publishing an event in CAPS: - recording on interface - importing xml file to CAPS interface - via SWIFT
KELER	→ Provides the possibility to give notice of events via the CAPS interface/SWIFT message
	→ In connection with a request for Shareholder identification from a Sub Custodian or other Intermediary, you will do the following: *responds to the stocks in the own account of the Clients involved in the event *forwards the shareholder identification request event to the Partners with the status
	→Production of a certificate of ownership at the request of a securities account manager from CAPS system
Securities Account Manager	→ Monitor events notified by the Issuer on its CAPS platform. It informs its account holders of company events published on this platform in accordance with its own internal processes.
	→Requesting a certificate of ownership for their own stock when attending a General Meeting

5.1. Shareholder identification

The Shareholder Identification process covers the flow of information between the Issuer or a third party authorised by the Issuer (hereinafter referred to as the "Issuer") and the chain of intermediaries (CSDs, banks, investment service providers) for the purpose of communicating to the Issuer the account holders/end investors and the securities held by them. All intermediaries are

required to provide the balance of the final investor (self-segregated) accounts and to forward the request to the holders of the principal accounts. The holders of the sponsoring accounts (the other intermediaries) will do the same until the request reaches the intermediary of the ultimate holders.

KELER conducts the entire shareholder identification process through CAPS, regardless of whether the securities are Hungarian or foreign. Accordingly, all information related to the shareholder identification process is available in CAPS.

The shareholder identification request is sent by the Issuer through the chain of intermediaries from the first intermediary (KELER in the case of Hungarian securities) to the last intermediary. As described above, KELER can participate in the shareholder identification process in two roles: as an intermediary and as an agent for the issuer to collect responses.

5.1.1. From intermediary to KELER

In the case of foreign securities managed by KELER, or in the case of Hungarian securities, if the Issuer has appointed an entity other than KELER to collect intermediary responses, KELER will act as intermediary. The Issuer initiates the shareholder identification request, which is received by KELER in ISO 20022 format via SWIFT. In response to the shareholder identification request, KELER will reply with a message in ISO 20022 format to the balances and related ownership information in the accounts of the clients who have their own securities accounts with KELER. It forwards the shareholder identification request to the principal balances.

5.1.2. Relationship between KELER and intermediaries

KELER will receive and respond to the request received and notify the market participants concerned.

Record date

The record date will be determined by the Issuer and the shareholder identification will be based on the end-of-day status of that day. The record date may be up to 12 months prior to the date of application.

For a postdated event:

A shareholder identification request submitted by an intermediary will be forwarded by KELER without delay to all account holders who had a balance of the security in question with KELER on the record date, but no later than the close of business on the day on which the request is received. If the request is received after 16:00, the request must be forwarded to KELER no later than 10:00 on the next Business Day.

KELER will handle the change to the application in the same way as above.

For a future event:

The KELER will forward the shareholder identification request sent by the intermediary to all account holders who have a balance or pending transactions in the relevant security with KELER at the time of receipt of the request without delay, but no later than the close of business on the day of receipt of the request. If the request is received after 16:00, the request must be forwarded to KELER no later than 10:00 on the next settlement day.

KELER will send the request to all KELER account holders to whom it has not previously sent it and who will have a balance or will be involved in a transaction in the relevant security by the record date.

KELER will handle the change to the application in the same way as above.

If the request for shareholder identification specifies the date of acquisition of the shares in <ReqShrHeldDt>, intermediaries must also specify this date in their response message.

The request will be transmitted in electronic format by KELER in ISO 20022 format which can be downloaded from the CAPS system interface in the form of seev.045 (shareholder identification request message) xml. For our clients with SWIFT connection, it is possible to send the notice via SWIFT, provided that this is indicated in the above contract and the related data reconciliation and key exchange is initiated with KELER.

In all cases, intermediaries should send the response to the DsclsrRspnRcpt (Disclosure Response Recipient) specified in the seev.045 shareholder identification request.

5.1.3. Shareholder identification carried out by KELER

If the issuer of the Hungarian listed share decides to commission KELER to collect the shareholder identification responses, it will instruct KELER to initiate the shareholder identification through the CAPS system. The Issuer can do this by selecting the event Conduct Shareholder Identification in the New Company Event menu.

Please note that this feature is not the same as the Ownership identification procedure and the recording of the event will incur a fee as set out in the KELER KELER Fee Schedules.

KELER forwards the shareholder identification request to the intermediaries holding the principal account with it and having a balance of the security concerned. The balances of the own accounts are forwarded by KELER to the Issuer from its own records and intermediaries are not allowed to include the balances in their reports. This applies to all intermediaries in the chain, so to avoid duplication, the balances of accounts with own segregation at the intermediary's securities account manager should not be included in the responses (unless the securities account manager have segregated own and client balances).

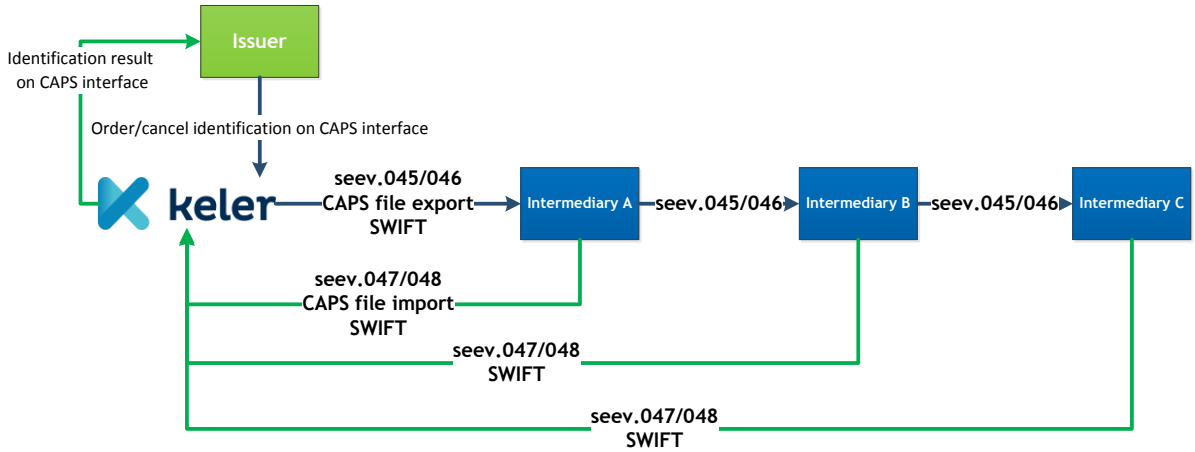
In the case of shareholder identification carried out by KELER, the Issuer cannot request the date of acquisition information. This information is not collected by KELER. For **intermediaries who do not have a direct account relationship with KELER, it is only possible to send the shareholder**

identification response to KELER via SWIFT. In order to establish this link, the intermediary must apply for the SWIFT key exchange with KELER.

As required by Regulation (EU) No 1212/2018, the intermediary must forward requests received by 16:00 on the same day to the next intermediary by 10:00 on the next business day for requests received after 16:00. KELER will send a confirmation message to the sending intermediary on the correctness of the format of the messages sent by the intermediaries.

KELER sets a final deadline of 15 settlement days[2] after the record date (or the date of submission of the request in case of a request for postdated record date) to respond to requests, in order to allow all members of the custodian chain sufficient time to send their responses. After the final deadline (17:00 on the last day), KELER will check the messages received against its own account management system and the other responses received (after 18:00 on the on the last day) and KELER will make the resulting shareholder's data available to the Issuer on the CAPS system interface.

In the CAPS, KELER will include all accepted shareholder identification data irrespective of the outcome of the verification. The Issuer that initiates the identification can do so by clicking on the Operations icon for that event on the Company Event Management screen and selecting View Shareholder Data. Under View Shareholder Data, it is possible to view the data in the interface and export it in xls format. Before the above check, you can also see the incoming shareholder data in the status validation in progress, successful validation or the reason for failure of validation after the check has been performed. During a successful validation, for the incoming shareholder identification responses (so-called child record), an attempt is made to find the data sent by the related parent intermediary (so-called parent record), the relationship is indicated in the list by the number of the indicated parent or child record. KELER will not cooperate in tracing intermediaries who do not reply or send incorrect replies.



[2] The calendar day on which KELER provides settlement or central securities depository services.

5.2. Services related to general assemblies

5.2.1. Notice of General Meeting

5.2.1.1. From the issuer to the issuing CSD

- The Issuer will record the notice of the general meeting in CAPS system of KELER and upload it to an import file no later than the date of sending/publishing the notice of the meeting. The Issuer shall record all changes related to the event in the CAPS system.

5.2.1.2. Relationship between KELER and intermediaries

- The notice of general meeting sent by the issuer will be forwarded by KELER to all account holders of the security who have a balance with KELER as of the day of the notice in the CAPS system without delay, but no later than the close of business on the day of receipt of the notice. If the notice is received after 16:00, the notice must be forwarded to KELER no later than 10:00 on the next Business Day. The system performs a direct query twice a day until the record date. KELER will send the event information to all KELER account holders who have not yet been sent the event information but have a new balance between the announcement date and the record date. KELER will not send a notice for transactions that are pending settlement on the record date but have not yet been settled.
- The notice will be sent in electronic format via the KELER CAPS system. KELER will handle any changes to the notice in the above manner.

5.2.2. Confirmation of eligibility to attend the General Meeting

5.2.2.1. Determination of eligibility- closing stock at the end of the reporting period

- Eligibility is determined on the basis of the closing balance at the date of the general meeting

5.2.2.2. Notice of eligibility

- KELER will send an eligibility notice to all KELER account holders who have a balance of the security in this sub-account.
- KELER will also issue a paper copy of the eligibility notice (upon the account holder's request), and KELER will also make it available to the account holder in the form of a KELER seev.003 message in the CAPS interface in a downloadable format.
- The share register remains the basis for attendance at the general meeting and is not replaced by the above notice.

5.2.3. Confirmation of the vote and the recording and counting of votes

The Htr. act requires Issuers to confirm the receipt, recording and counting of votes received via electronic means of communication and to transmit these confirmations to intermediaries, if the voting is held by electronic means of communication at a conference meeting under the provisions of Article 3:281(3) of the Civil Code.

A confirmation of the vote (Table 6 of Regulation (EU) No 1212/2018, message seev.006) is required in all cases after the vote has been received by the issuer. The confirmation of the recording and counting of the vote (Table 7 of Regulation (EU) No 1212/2018, message seev.007) must be sent to the shareholder if the shareholder has requested it from the issuer within 30 days of the date of the general meeting. Of course, the issuer may decide to send the confirmation for all votes received electronically.

The issuer can send the above messages to KELER through CAPS by selecting the appropriate general meeting in the CAPS menu under the menu item Management of corporate events and selecting the sub-menu item Confirmation of receipt of votes or Confirmation of votes counted under the menu item Operations by uploading the messages seev.006 or seev.007. The issuer is responsible for preparing seev.006 and seev.007 messages in advance. A file upload screen will be displayed where you will be able to upload a file and select the recipient intermediary from the list displayed. The relevant intermediary can be identified from the share register. Only those intermediaries participating in CAPS who currently have a balance in relation to the relevant general meeting will appear in the list. When the file is uploaded, the system performs a format check (against ISO 20022 requirements) and delivers the file to the designated intermediary. The issuer can find all the messages he has uploaded in the system under the menu item Messages of company events, filtered by message type "Publication of the status of the vote of the General Meeting" or "Publication of the resolutions of the General Meeting".

The Htr. act requires intermediaries, including KELER, to forward confirmations to their clients. KELER makes the general meeting messages available to its intermediary clients via the CAPS system, in addition to the messages to its clients requesting them via SWIFT. The seev.006 and seev.007 messages are displayed on the Corporate Event Messages screen in CAPS for KELER securities account holders. KELER securities account holders can only see the messages "addressed" to them.

KELER uses the standard seev.006 and seev.007 message. Only the AppHdr (head.001.02 message) BusinessMsgId and To fields in the received files are changed by the system when sending the message to the intermediaries, the data content of the message remains unchanged.

5.2.4. Publication of the resolutions of the General Assembly

The resolutions of the general meeting can be recorded by the Issuer on the CAPS system, and all relevant securities account holders will also be informed of the results on the CAPS system.

KELER will also make the resolutions of the general meeting available to securities account holders

in the form of seev.008 messages in ISO 20022 format, in an exportable format.

5.3. Notice of company events other than general meetings

5.3.1. From the issuer to KELER

The Issuer must record the corporate event notice in KELER CAPS at the same time as the information is published. The Issuer shall record in CAPS any changes relating to the event.

5.3.2. Relationship between KELER and intermediaries

The corporate event notice uploaded by the Issuer will be forwarded by KELER to all account holders who have a balance with KELER on the date of the notice or had a balance on the record date (if postdate) of the relevant security without delay, but no later than the close of business on the date of receipt of the notice. If the event upload is received in KELER's CAPS system after 16:00, the notice must be transmitted to KELER no later than 10:00 on the next business day. KELER will continuously monitor which CAPS securities account holder acquires a new balance until the record date. In this case, twice a day, after 8:00 a.m. and after 5:00 p.m., KELER will send a notice of the new position (to securities account holders with no previous balance). If the event is modified by the Issuer between 8:00 and 17:00, securities account holders who already have a position and have received notice of the event will receive a notice of the modification with the balance details retrieved at 8:00. If the change is made between 17:00 and 8:00 by the Issuer, securities account holders who already hold a position and have been notified of the event will receive a notice for the balance retrieved after 17:00.

The notice must be transmitted in electronic format in ISO 20022 format, regardless of the communication channel. All message transmissions shall be time-stamped. The method of transmission shall be via CAPS interface and SWIFT ISO 20022 format downloaded from the interface.

KELER will handle all changes to the notice in the above manner.

5.3.3. Corporate events managed

KELER provides services for notices of corporate events other than the general meeting:

i. Bonus issue (BONU)
ii. Change (CHAN)
iii. Mandatory conversion (CONV)
iv. Decrease in Value (DECR)
v. Delisted (DLST)
vi. Disclosure (DSCL)
vii. Cash Dividend (DVCA)
viii. Stock Dividends (DVSE)
ix. Increase in Value (INCR)
x. Liquidation (LIQU)

xi. Merger (MRGR)
xii. Redenomination (REDO)
xiii. Spin-off (SOFF)
xiv. Stock split (SPLF)
xv. Reverse Stock Split (SPLR)
xvi. Voluntary tender (TEND volu)
xvii. Mandatory tender (TEND mand)

Definition of terms

CAPS securities account holder: a KELER securities account holder who has a CAPS relationship and can also open a principal sub-account.

Day of trading without rights: Record date-1 business day according to the BSE trading calendar. CAPS system automatically calculates from the Record date.

Value date: The date of the securities transaction relating to the event. Optional date according to KELER settlement calendar, which cannot be in the past.

Security name: Name of the security to which the event relates.

Record date: date selected according to the BSE trading calendar, which cannot be in the past.

ISIN: The international securities identification number assigned to the security, determined in accordance with ISO 6166 or a compatible method. ISIN identifier of the security to which the event relates.

Payment value date: The date of the monetary transaction for the event.

Supplementary data: data and information in English and/or Hungarian that the Issuer deems relevant to the event. If the field is filled in, we recommend using both languages for easier processing.

Issuer notice URL: The web address of the official issuer notice for the event concerned. Mandatory data to be filled in for all event announcements.

ISIN code of the underlying security: the ISIN code of the security that the shareholder concerned is entitled to receive in the event in addition to the existing shares.

Name of underlying security: automatically filled in by CAPS based on ISIN.

Corporate event: an action initiated by the issuer or a third party that involves the exercise of rights attached to a share and may or may not affect the underlying share, such as a share split or a general meeting.

Fragment handling rule: For corporate events in which another security is credited in connection with the right to the security concerned, the issuer may specify the rules it wishes to apply to the

fractional shares that arise after the split. It may either not treat the fractional shares or it may choose to pay the fractional shares in cash.

Last day of trading on BSE: The last day on which shares may be bought and transferred together with the rights to participate in a corporate event.

i. Bonus Issue (BONU)

Holders of shares will receive additional securities in the issuer's product range in proportion to their holdings of existing ordinary shares.

ii. Change (CHAN)

The notice of a change of data is a corporate event and does not involve any movement of securities or money. In general, a change of name, registered office or address may be announced during the event.

iii. Mandatory Conversion (CONV)

The conversion of securities (usually convertible bonds or preference shares) into another form of security (usually ordinary shares) based on a predetermined price/ratio.

iv. Decrease in Value (DECR)

Decrease of the nominal value of a security. The number of securities outstanding remains unchanged. The event may also involve a cash payment to the account of the holders of the shares.

v. Delisted (Trading Status: Delisted - DLST)

The security does not meet the listing requirements and is delisted from the official list.

vi. Disclosure (DSCL)

Request for the ownership details, including the percentage of ownership, personal details of the beneficial owner.

In the case of retroactive Ownership identification procedure, please give notice of this event on the CAPS interface.

Retrospective ownership identification procedure can be announced on the CAPS page back to July 2006.

The notice of Ownership identification procedure does not constitute an order for service, an event order via the form is still required.

vii. Dividend payment (Cash Dividend - DVCA)

Cash distribution of the company's profits to shareholders in proportion to their shareholdings.

viii. Stock Dividend (DVSE)

Dividend payment in securities.

ix. Increase in Value (INCR)

Increase the nominal value of a security without changing the amount of securities in the form.

x. Liquidation Payment (LIQU)

The dissolution of an issuing company without legal succession, whereby cash is distributed in proportion to the shareholding, with the securities cancelled.

xi. Merger (MRGR)

A merger of two or more companies initiated by the issuer. A cash payment may accompany the exchange of outstanding securities.

xii. Currency redenomination (REDO)

Change in the currency denomination of the security.

xiii. Spin-Off (SOFF)

In addition to the creation of another company, the division of the existing business by placing new shares.

xiv. Stock Split (SPLF)

The increase in the number of outstanding shares of the company without change in market value. The share price and the nominal value decrease proportionally.

xv. Reverse Stock Split (SPLR)

Reduction in the number of shares issued by the company without any change in the shareholders. The price and nominal value of the security will increase proportionally.

xvi. Tender (TEND VOLU) voluntary

An offer to buy made by a third party to shareholders. During the event, the beneficial owner may offer to sell his shares at the discount of the party making the offer to buy.

xvii. Tender (TEND MAND) mandatory

If the main shareholder of the company acquires more than 90% of the votes as a result of the takeover bid, a so-called displacement procedure may be used. A tenderer may initiate a displacement procedure if it wishes to become the sole owner of the company, under which it may exercise a right to purchase shares not acquired in the takeover bid. If the small shareholders do not surrender their shares within the time limit, the company will declare them invalid and issue new shares and set aside the consideration for the shares for the small shareholders. Under BSE rules, the shares will be automatically delisted from the

stock exchange after the deadline for delivery of the shares has expired.

Events announced by the Issuer are also available on the KELER website (www.keler.hu/társasági events).

6. Management of corporate events relating to securities registered in T2S

Currently KELER distinguishes between the following types of events:

- Events involving movements of securities
- Events involving the movement of funds

6.1. Handling of securities movement events in T2S

For events where the security is T2S relevant, the corporate event can be executed within the T2S operating hours. If the execution of the corporate event would fall outside T2S operating hours, KELER shall execute the corporate event on the next T2S business day.

6.2. Handling of cash flow events in T2S

In the case of events where KELER is the Paying Agent and the currency of the payment is EUR, KELER will settle the transactions in T2S.

7. Market claim compensation, transformation and buyer protection processes

For orders pending (even but not matched) at the date of the corporate event or successfully matched within the recycling period, compensation services for corporate event-related transactions in EUR will be introduced in the Hungarian market:

- Market claim: financial compensation between seller and buyer (only for bond transactions)
- Eligibility transformation (hereinafter referred to as transformation): the transformation of a contingent transaction resulting from the transformation of a security
- Buyer protection: representation of the buyer's rights in the management of a corporate event in the event of an election.

In connection with the above services, KELER is responsible for monitoring and recording company events.

7.1. Market claim management

A market claim is the compensation between settlement counterparties of the return on transactions pending on the date of the security or cash event ("distribution").

The purpose of market claim management is to reallocate the proceeds (securities, money) to be received in the context of a corporate event giving rise to an interest or yield payment to the eligible party up to the amount of its outstanding position at the reporting date in order to exercise the rights attached to the security against the issuer.

Affected transactions:

- Pending EUR DVP paired transactions as of the record date.

Range of securities concerned:

- Bonds/Mortgage bonds

Possible corporate events:

- Interest payment - INTR
- Capital repayment without change in nominal value - PRED

Process:

1. KELER identifies the pending transactions affected on the day of the event (or each day thereafter until RD+20 T2S business day).
2. In the case of a EUR DVP transaction, the Parties may notify to KELER their intention to participate in the claim (within RD+20 T2S business days) by using the 'Market claim form' published on the website at kelertesem@keler.hu.
   If only one party submits a form, or if the information on the forms submitted differs, KELER will not carry out the compensation, and will inform the party(ies) concerned by e-mail.
3. If both the Buyer and the Seller indicate their claim in the same way, KELER will calculate the amount of compensation in case of a positive decision.
4. the details of the processing (company event, transaction ID, ISIN ID, priority dates, compensation amount, etc.):
   - SWIFT MT564 in the form of a message
   - in messages received on the client KID in the form of an information notice, announcement, message, which is notified to the securities account manager,
   - or, in the absence thereof, in an agreed form as determined by the securities account manager

   notify the Parties by 18:30 on the business day following receipt of the claim.
5. If the currency of the corporate event is HUF, the place of settlement of the claims will be in KELER. In the case of EUR, the compensation will be carried out by KELER in T2S.
6. The conditions for settlement of the claim (transfer between partners in VIBER in case of HUF claim or PFOD recording in T2S in case of EUR claim) are fulfilled:
   - a securities account holder with a corresponding cash account to be debited, which may be held by KELER,
   - the account has sufficient funds to cover the compensation,
   - the payment date of the corporate event has already arrived (PD),
   - a payment resulting from a corporate event has been made (either directly by KELER or indirectly, as certified to the KELER by the Paying Agent),

- a previously pending underlying transaction has been settled.

7. Successful claim settlement (if the above conditions are met):
   - MT900/910/950 message and end-of-day statement in HUF and credit/debit notice and end-of-day statement in FX will be sent to the Parties on the settlement in the current mode,
   - The debit and credit will be made to the partner's account indicated on the claim.
8. If the original settlement order is settled by 10:00, KELER will settle the claim related to the transaction by 13:00 on the same day. If an order settled after 10:00, the related claim will be settled by KELER on the next business day. KELER will inform you about the details of the settled claim (corporate event, transaction ID, ISIN ID, priority dates, compensation rate, etc.):
   - SWIFT MT566 in the form of a message,
   - in messages received on the client KID in the form of an information notice, announcement, message, which is notified to the securities account manager,
   - or, in the absence thereof, in a pre-agreed form as determined by the securities account manager

   notify the Parties.

   A claim settlement is unsuccessful if not all of the above conditions are met by the end of the recycling period or if the necessary collateral is not available for settlement by the end of the RD+20 T2S business day. KELER shall notify the Parties of the failure of the settlement by deleting the MT564 message in the form of a notice, announcement, message in the Messages received in the thick client KID or, in the absence thereof, in a pre-agreed form as determined by the securities account manager.

7.2. Handling Transformations

In the transformation process, pending transactions at the end of the day before the day of the event (PD-1) of the securities conversion events ("reorganisations") are cancelled and new instructions are created by KELER according to the terms of the event, if the underlying transaction is eligible for compensation. If there is a pending but even transaction in the settlement system on day PD-1 for the security concerned, transformation processing is also relevant, as for market claims.

Affected transactions:

- PD-1 day pending matched EUR DVP transactions

Range of securities concerned:

- All types of securities

Possible corporate events[3] :

- Decrease in Valu - DECR
- Increase in Value - INCR
- Merger - MRGR
- Spin off - SOFF
- Redenomination - REDO
- Split - SPLF
- Reverse split - SPLR
- Conversion - CONV

Process:

1. KELER identifies the pending orders affected on PD-1 of the event.
2. On the PD day of the event, the write-offs and write-ups are executed in connection with the processing of the event.
3. The relevant pending orders will be cancelled (by 13:00 PD day), a final cancellation message will be sent to both securities account holders on KID and a MT548 CAND//CANI message on SWIFT.
4. The new instructions will be generated by KELER (value date: PD 13 h). The buyer will be compensated against the seller:
    - the new EUR DVP transactions are uploaded to KELER and T2S,
    - details of the new transaction will be notified to our clients via SWIFT MT548 message, KID in the Inbox in the form of an announcement, notice, message,
    - if the original settlement order is cancelled by KELER in a held status, the new transaction will also be entered into the system in a held status, and the securities account holders will be informed of this in the form of the notices referred to in the previous Section,
    - the release of the new order must be requested by our clients by sending a signed, free-text letter to szamlavezetes@keler.hu by 15:30, as notified to KELER. In the absence of a settlement request, after 60 business days the transaction will not be settled and therefore the event will not be settled.

5. Following the detection, KELER may carry out the transformation without the Parties' request to participate. In case of a successful transformation settlement:
    - SWIFT MT544-547 in the form of a message
    - in thick client KID Inbox messages In the form of an information notice, announcement, message, which is notified to the partner,
    - On KID, the booked transaction is displayed in the T700/EP02 statement and on SWIFT in the MT536 report,

[3] Expiry - REDM, MCAL, TEND (MAND) event management specialities are important to mention. The need to handle transformation in case of bond maturity, premature cancellation and displacement does not arise, because on KELER RD the pending transactions are cancelled. This also means that there is no market claim settlement for bond interest payments due at maturity.

- or, in the absence thereof, in a pre-arranged form, as determined by the Securities Account Manager, by 16:30.

7.3. Handling Buyer protection

Buyer Protection (BP) is an instruction linked to an event with an optional outcome, which gives the (legal but not yet physical) holder of a security the right to choose the option he or she prefers in connection with the event.

Buyer Protection is relevant for Clients in a buy position with a pending settlement order in certain corporate events, because with the intervention of KELER, the Buyer can exercise the right to the security in accordance with the Buyer Protection principles, despite the pending status of the transaction.

In the case of Buyer Protection, there is no central processing by KELER, but KELER creates the conditions for Buyer Protection for the parties as required by the standards.

Buyer Protection [is] enforced by means of a form that can be used by the parties involved in the settlement for this purpose, whereby the buyer's custodian, indicating its preferences for its pending orders, sends the completed form to the selling party's custodian, who submits its application for the event on behalf of the buyer. If the instructions to the seller's custodian to invoke Buyer Protection are received after the market deadline, they can no longer be taken into account and the pending transactions must be cancelled and re-instructed according to the options to be chosen.

Range of securities concerned:

- All types of securities

Possible corporate events:
Today, the companies typically carry out the optional events without the involvement of KELER. Examples of such events include:

- DRIP (MAND) - dividend reinvestment
- DVOP (MAND) - dividend with option
- BIDS (VOLU) - buyback offer
- CONV (VOLU) - conversion
- EXWA (VOLU) - Conversion of warrants into shares
- TEND (VOLU) - Bid by 3rd party

Process:

1. Buyer identifies the pending transaction for which he wishes to request BP
2. Send the completed BP template to the Seller and KELER at kelertesem@keler.hu
3. Seller confirms to Buyer the acceptance of the BP and sends it to KELER at kelertesem@keler.hu

4. Seller asserts Buyer's preference for the corporate event giving rise to the election to the issuer by the market deadline

The international standard Buyer Protection form will also be made available on the KELER website.

8. Annexes

Ownership identification procedure order form

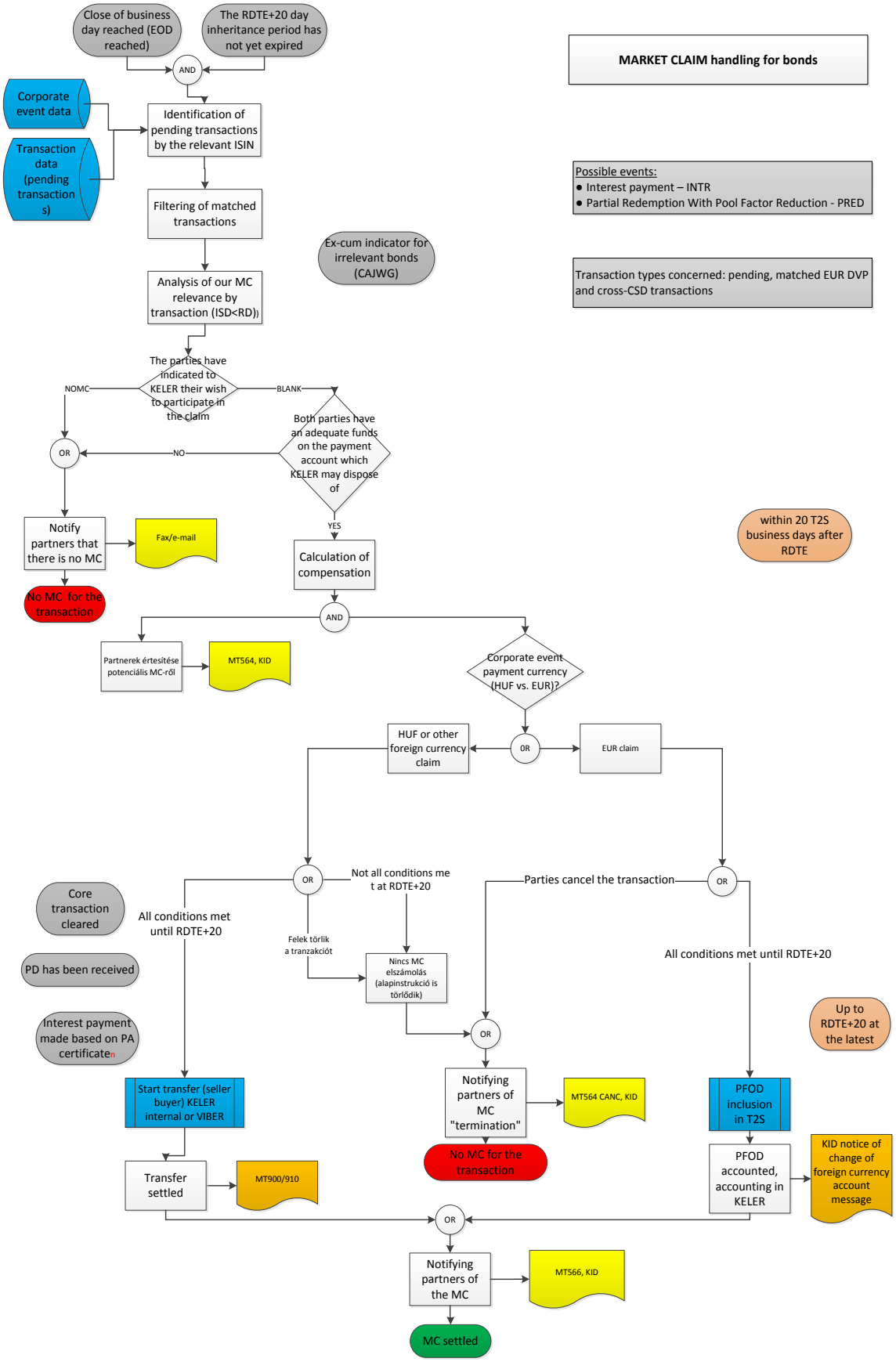
https://www.keler.hu/Dokumentumtár/Formanyomtatványok/Társasági%20események/2023_01_27_1_Tulajdonosi-megfeleltetes-kibocsato-altali-megrendelese.pdf?download

Retrospective ownership identification procedure order form

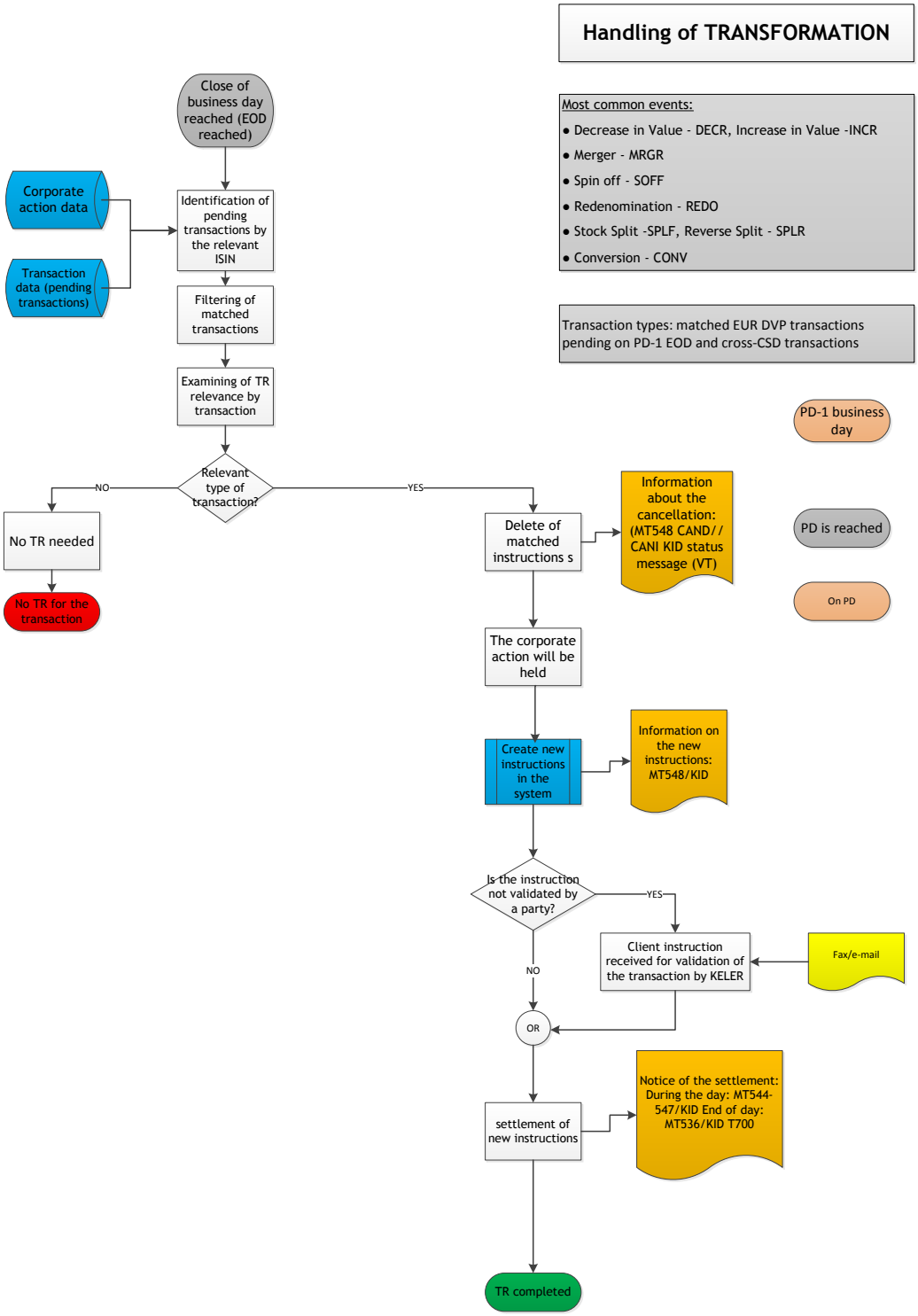
https://www.keler.hu/Dokumentumtár/Formanyomtatványok/Társasági%20események/2023_01_27_2_Visszamenoleges-tulajdonosi-megfeleltetes-megrendelese.pdf?download
Payment instruction list ordering

https://www.keler.hu/Dokumentumtár/Formanyomtatványok/Társasági%20események/2023_01_27_4_Kifizeteshez-kapcsolodo-kibocsatoi-rendelkezes-demat-ep-sorozathoz.pdf?download

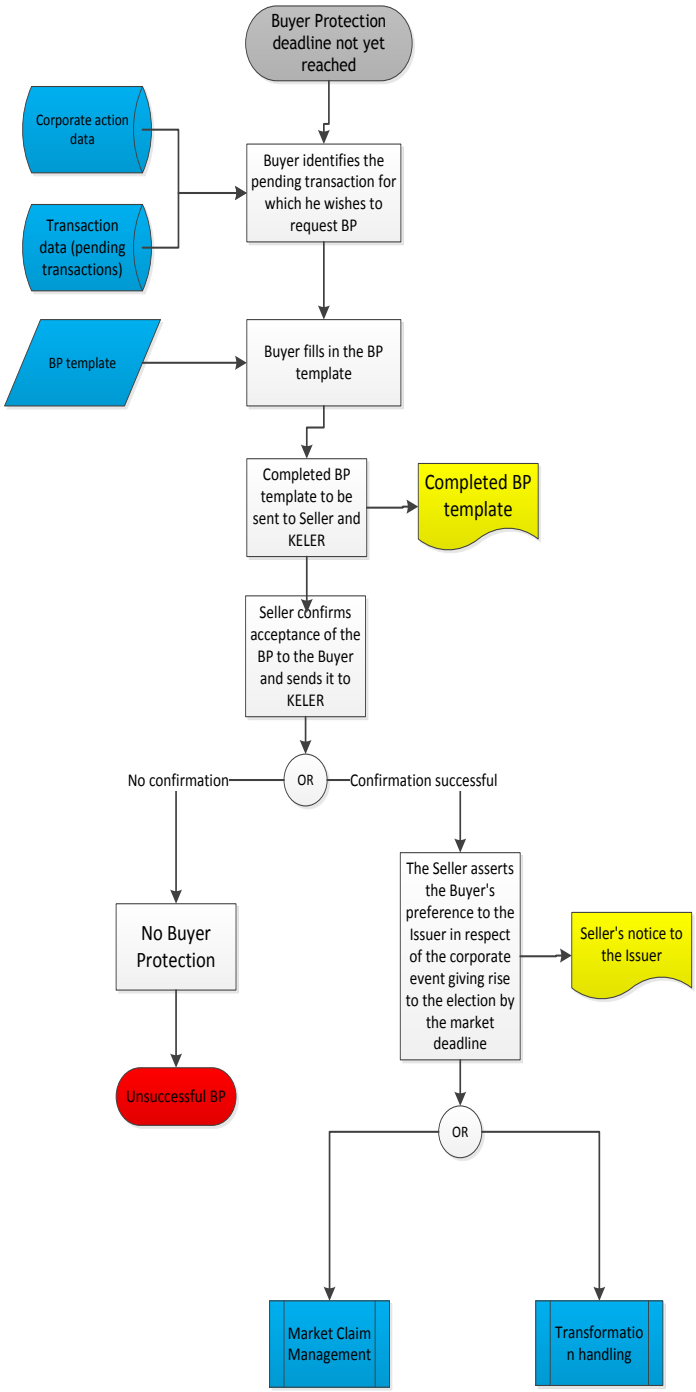
Market claim handling process



Transformation management process



Buyer protection process



BUYER PROTECTION process

Most common events:

- DRIP (MAND) - Dividend Reinvestment
- DVOP (MAND) - Dividend Payment with option
- BIDS (VOLU) - Repurchase Offer
- CONV (VOLU) - Conversion
- EXWA (VOLU) - Warrant Exercise
- TEND (VOLU) - Tender

Transaction types concerned: day-to-day EUR DVP transactions and cross-CSD transactions

MT564/566 sample messages

Below is an example of the messages used in the market claim process.

MT564: potential Market Claim detection

```
:16R:GENL
:20C::CORP//NONREF
:20C::SEME//CLAIMINTR01
:23G:NEWM
:22F::CAEP//DISN
:22F::CAEV//INTR
:22F::CAMV//MAND
:25D::PROC//COMP
:16R:LINK
:20C::RELA//STL0000001
:16S:LINK
:16S:GENL
:16R:USECU
:35B:ISIN HU0000402123
:16R:FIA
:11A::DENO//EUR
:16S:FIA
:16R:ACCTINFO
:97A::SAFE//SA1
:93B::ELIG//FAMT/1000000,
:16S:ACCTINFO
:16S:USECU
:16R:CADETL
:98A::RDTE//20151118
:22F::ADDB//CLAI
:16S:CADETL
:16R:CAOPTN
:13A::CAON//001
:22F::CAOP//CASH
:17B::DFLT//Y
:16R:CASHMOVE
:22H::CRDB//CRED
:19B::MKTC//EUR100,00
:98A::PAYD//20151120
:16S:CASHMOVE
:16S:CAOPTN
```

MT564 CANC: Delete Market Claim

```
:16R:GENL
:20C::CORP//NONREF
:20C::SEME//CLAIMINTR01C
:23G:CANC
:22F::CAEP//DISN
:22F::CAEV//INTR
:22F::CAMV//MAND
:25D::PROC//COMP
:16R:LINK
:20C::PREV//CLAIMINTR01
:16S:LINK
:16R:LINK
:20C::RELA//STL0000001
:16S:LINK
:16S:GENL
:16R:USECU
:35B:ISIN HU0000402123
:16R:FIA
:11A::DENO//EUR
:16S:FIA
:16R:ACCTINFO
:97A::SAFE//SA1
:93B::ELIG//FAMT/1000000,
:16S:ACCTINFO
:16S:USECU
:16R:CADETL
:98A::RDTE//20151118
:22F::ADDB//CLAI
:16S:CADETL
:16R:CAOPTN
:13A::CAON//001
:22F::CAOP//CASH
:17B::DFLT//Y
:16R:CASHMOVE
:22H::CRDB//CRED
:19B::MKTC//EUR100,00
:98A::PAYD//20151120
:16S:CASHMOVE
:16S:CAOPTN
```

MT566: Successful settlement of a Market Claim

```
:16R:GENL
:20C::SEME//CLAIMINTR02
:20C::CORP//NONREF
:23G:NEWM
:22F::CAEV//INTR
:16R:LINK
:20C::RELA//STL0000001
:16S:LINK
:16S:GENL
:16R:USECU
:97A::SAFE//SA1
:35B:ISIN HU0000402123
:93B::CONB//FAMT/100000
0,
:16S:USECU
:16R:CADETL
:98A::RDTE//20151118
:22F::ADDB//CLAI
:16S:CADETL
:16R:CACONF
:13A::CAON//001
:22F::CAOP//CASH
:11A::OPTN//EUR
:16R:CASHMOVE
:22H::CRDB//CRED
:97A::CASH//CA1
:19B::GRSS//EUR100,00
:19B::TAXR//EUR0,00
:19B::NETT//EUR100,00
:19B::PSTA//EUR100,00
:19B::MKTC//EUR100,00
:98A::POST//20151120
:98A: :CASTING//20151120
:92A::INTP//0.0001
:16S:CASHMOVE
:16S:CACONF
```

Annex 8 - Sample messages MT548/544-547

Below is an example of the messages used in the transformation process.

MT548: Transformation of new transaction pair status

:16R:GENL
:20C::SEME//TRINTR01
:23G:INST
:16R:LINK
:20C::RELA//a security account manager identifier of old transaction
:16S:LINK
:16R:LINK
:20C::CORP//NONREF
:16S:LINK
:16R:STAT
:25D::MTCH//MACH
:16S:STAT
:16R:STAT
:25D::SETT//PEND
:16R:REAS
:24B::PEND//PREA or PRCY or BOTH (if either party's transaction is not validated)
:16S:REAS
:16S:STAT
:16S:GENL
:16R:SETTRAN
:35B:ISIN HU0000068952
:36B::SETT//UNIT/100,
:19A::SETT//EUR100000,
:97A::SAFE//SA1
:22F::SETR//TRAD or PREA (PREA if the transaction is not validated)
:22H::REDE//DELI
:22H::PAYM//APMT
:98A::TRAD//20170103
:98A::SETT//20170103
:16R::SETPRTY
:95P::REAG//partner 11-digit BIC code
:16S::SETPRTY
:16R::SETPRTY
:95P::PSET//KELRHUHBXXX
:16S::SETPRTY
:16S::SETTRAN