

**KELER Depository Announcement -
No. 9-04**
Services related to Hungarian corporate
actions

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1. General part

1.1. Introduction

This announcement provides information on the range of ancillary services provided by KELER, as a central securities depository, in connection with corporate actions related to securities issued in Hungary (i.e. identified by an ISIN code starting with HU) and registered on KELER's central securities accounts and securities related accounts.

1.2. Range of ancillary services provided by KELER

In relation to the securities registered by it, KELER Ltd. supports the exercise of rights attaching to securities in connection with corporate actions implemented at the Issuer's request by providing the following services.

1.2.1. Ancillary services related to corporate actions involving payment (Section 2)

- Ownership identification (“*tulajdonosi megfeleltetés*”) for share-related payments (e.g. dividend payment, interim dividend payment, capital payment)
- Ownership identification for payments related to debt securities (e.g. interest payment, principal repayment, redemption, repurchase, interest at maturity and capital payment)
- Ownership identification for payments related to investment units (yield payment, yield at maturity and capital payment)

1.2.2. Ancillary services related to corporate actions not involving payment (Section 2)

- Ownership identification in relation to a shareholders' meetings
- Updating of the Register of Shareholders
- Ownership identification in relation to the transformation of an investment fund

1.2.3. Retrospective Ownership identification (Section 3)

- Retrospective Ownership identification ordered by the Issuer or the Issuer's agent for an earlier record date.
- Retrospective Ownership identification ordered by the competent authority for an earlier record date within the framework of official proceedings (conducted by the MNB).

1.2.4. Payment instruction (Section 4)

A document given to the Issuer in connection with corporate actions involving payments that indicates in a centralized way, for a specific record date and a specific currency, the volume of securities recorded in the Account Holder's central securities accounts, as well as

the bank accounts specified based on the Account Holder's declarations to which it requests the instruction for the amount due upon the corporate action involving a payment.

1.3. General rules

1.3.1. Method of order placement

Ownership identification procedure or payment instruction ("*kifizetési diszpozíció*") may be ordered by the Issuer or the Issuer's agent by completing the standard form available on the website of KELER Ltd. and submitting it by e-mail or by post.

1.3.2. Date of order placement

The order for such an action shall be placed with KELER Ltd. by no later than the submission deadline specified depending on the given action or the type of security.

- for shares: Record date -3 working days (section 2.2.3)
- for debt securities: Record date -3 working days (section 2.3.1)
- for investment units: Record date -3 working days (sections 2.4.1 and 2.4.3)

Record date: whoever is the owner of the security at the end of this day shall be entitled to exercise the rights pertaining to the specific due date, as specified in the KELER regulations.

1.3.3. Name and signature of the person placing the order

Orders will only be accepted if they bear the name and the authentic signature of the person authorised to sign for and represent the Issuer or the Issuer's agent. Instead of a copy bearing such a signature, sending an electronically signed (es3 format) copy of the order form by e-mail is also acceptable.

1.3.4. Completing the order form

Order forms must always be completed in full.

2. Ownership identification

2.1. General provisions applicable to corporate actions conducted at the request of the Issuer

KELER shall inform Clients through the KID system about corporate actions to be implemented in accordance with these regulations.

If a corporate action cannot be implemented in accordance with these regulations, KELER shall also publish the mandatory rules of procedure agreed with the Issuer in the KID system.

When calculating the days of an action, KELER takes into account settlement days (clearing business days).

Ownership identification requested by the Issuer shall apply to the total amount of securities managed by KELER on the record date.

Client shall transfer the holders' details to KELER in respect of the securities at its disposal.

The Client shall provide KELER in advance with the number of the bank account or cash account number to which it requests that all transfers related to corporate actions involving cash flows be made. KELER will display to the Issuer the account number specified in the payment instruction.

If the Client fails to provide its bank account number, KELER will provide to the Issuer the number of the Account Holder's payment account held with KELER in respect of transfers related to corporate actions involving cash flows.

Any loss resulting from the failure to provide a bank account number or cash account number shall be borne by the Client.

The Register of Shareholders may be kept under different rules for individual Issuers. It is the Issuer's responsibility to draw the shareholders' attention to the special rules applicable to the given Register of Shareholders, including the relevant provisions of KELER.

2.2. Ownership identification in the case of shares

2.2.1. General requirements

The Issuers of all publicly traded shares are obliged to request KELER to perform an Ownership identification in case of a corporate action involving payment (dividend payment, interim dividend payment and interest payment for interest-bearing shares).

Clients may notify their intentions to participate in a corporate action associated with the blocking of a securities account by no later than 16:00 on the E-5 day via fax or by 10:00 on the E-4 day via the electronic customer service system.

Based on the blocking request, KELER will block the amount of securities specified by the Account Holder from the E-4 day to the E day. Following E-4 day, KELER will unblock the account at the express request of the Account Holder, otherwise the blocking will be automatically terminated after the E day.

In the case of all corporate actions involving Ownership identification, the Account Holder may transfer to KELER the data of the shareholders wishing to enforce their rights vis-à-vis the Issuer on the owner data collection date by no later than 15:00 through the KID system or between 10:00 and 15:00 personally, on a standard data carrier. The data shall be transferred according to the formal and substantial requirements specified by KELER. KELER announces the owner data collection date in its KID system under the menu item Announcements/KELER Information/Corporate actions and Securities Information.

2.2.2. Announcement of a corporate action

The Issuer shall notify KELER of any corporate action immediately after the decision on the relevant corporate action has been made and by no later than third settlement day prior to the record date of the corporate action. Should the Issuer fail to fulfil this obligation or fulfil it with some delay, KELER shall not be liable for any damages arising therefrom.

Record date: whoever is the owner of the security at the end of this day shall be entitled to exercise the rights pertaining to the specific due date, as specified in the KELER regulations.

2.2.3. Preferential days of corporate actions

During execution of a corporate action related to shares, the following days are considered preferential days:

- Record date -3 working days: the last day for sending the order regarding the corporate action to KELER. Should the Issuer fail to fulfil this obligation or fulfil it with some delay, KELER shall not be liable for any damages arising therefrom. If the Issuer executes the order on record date-2, record date-1 or on the record date, the rush surcharge specified by the Fee Regulations effective shall be charged.
- E-7 day (cum date): in the case of shares listed on the Budapest Stock Exchange (hereinafter referred to as “BSE”), the last day of trading when shareholder’s rights related to the corporate action specified by the Issuer are bought and sold together with the securities.
- E-6 day (ex-date): In the case of shares listed on the BSE, the first day of trading without the right to participate in the corporate action specified by the Issuer.
- E-5 day (record date): the right to exercise shareholder’s rights shall be held by the shareholder who is registered on this date as the holder of the shares. This is the last day when shares with a due coupon can be delivered in and out.
For materialised shares, should the shares be delivered to KELER with due coupon, KELER will cut and return the coupons as a service subject to a fee.
- E-4 day: the day when the data of shareholders are provided to KELER.
- E-2 day: submitting the results of the Ownership identification to the Issuer or its agent (and in case of corporate action with payment, the payment instruction is also submitted).
- “E” day (event date): day of the corporate action.

The Issuer may propose rules of procedure diverging from the above. Any different procedure rules shall apply to the determination of the record date. Order deadline shall be the third working day preceding a record date thus specified.

2.2.4. Processing of Ownership identification files

Files received via KID are processed continuously. In case of erroneous items, KELER notifies the cause of the error via KID. Once the error has been rectified, the corrected file can be resubmitted.

KELER is required to accept files - also those already corrected by the Account Holder - by 15:00 on the E-4 day.

If no file is received by 15:00 on the E-4 day or an erroneous file is received by KELER, it shall notify the submitting client via KID of the non-processability of the provided shareholders' data. In this case, the client may transfer the shareholders' data directly to the Issuer or the Issuer's agent.

2.2.5. Allocation

In case of both dematerialised and physical shares, KELER performs allocation exclusively in terms of number of denomination units.

On E-2 day, the number of basic denomination units linked to individual shareholders is forwarded to the Issuer or its agent on a standard data carrier or by e-mail in an electronically signed (.es3) form.

In case of non-identified positions, KELER will report the aggregate position without name and mark it as non-identified.

2.3. Ownership identification in the case of debt securities

For the debt securities kept with KELER, at the order of the Issuer, KELER will participate in the execution of the payment on the maturity date (interest payment, principal repayment, payment of interest and principal, payment at maturity) and will perform Ownership identification.

2.3.1. Preferential days of corporate actions

- Record date -3 working days: last day to send the request for Ownership identification and/or payment instruction to KELER. Should the Issuer fail to fulfil this obligation or fulfil it with some delay, KELER Plc. shall not be liable for any damages arising therefrom. If the Issuer executes the order on record date-2, record date-1 or on the record date, the rush surcharge specified by the Fee Regulations effective shall be charged.
- E-4 day (cum date): in the case of debt securities listed on the BSE, the last trading day when the securities are traded with the right relating to the given maturity date.
- E-3 day (ex-date): in the case of debt securities listed on the BSE, the first trading day on which the securities are traded without the right relating to the given maturity date.
- E-2 day (record date): persons are entitled to payment and are registered as holders, if the securities concerned are recorded on their accounts at the end of this day. Accordingly, until the closure of the settlement day concerned, operations in debt securities accounts can be executed with the intention of participation in the action concerned.
- E-1 day: Account managers are required to submit to KELER the shareholders' data in connection with the Ownership identification in line with the provisions of the Depository Announcement entitled "Cut-off times to receive, execute and cancel orders".

On E-1 day, KELER forwards the payment instruction to the Issuer, which contains the bank account numbers or cash account numbers where payments are to be made, broken down by Client, submitted earlier by the Account Holder on the dedicated form.

- On the E date, KELER forwards the results of the Ownership identification to the Issuer, where the Issuer requested KELER to complete it.
- “E” day (event date): date of payment and date of registration of holders by the Issuer.

The Issuer may propose rules of procedure diverging from the above, however, it is not possible to establish shorter periods of time. Any different procedure rules shall apply to the determination of the record date. Order deadline shall be the third working day preceding a record date thus specified.

2.4. Ownership identification in the case of investment units

In case of investment units managed by it, KELER participates in the execution of actions at the maturity date (yield and yield advance payment, principal repayment, fund expiry, fund conversion) based on the written order of the Issuer.

2.4.1. Preferential days of payments due within the term or prior to maturity

Preferential days relating to maturity date:

- Record date -3 working days: last day to send the request for Ownership identification and/or payment instruction to KELER. Should the Issuer fail to fulfil this obligation or fulfil it with some delay, KELER shall not be liable for any damages arising therefrom. If the Issuer executes the order on record date-2, record date-1 or on the record date, the rush surcharge specified by the Fee Regulations effective shall be charged.
- E-5 day (cum date): in case of investment units listed on the BSE, this is the last day when the units are traded with the right to the payment concerned.
- E-3 day (record date): persons are entitled to payment on the maturity date, are registered as holders and are entitled to yield and interim yield payment on the maturity date, if the investment units are recorded on their securities accounts at the end of this day. Accordingly, investment units-related securities account transactions can be completed with the right linked to the maturity date concerned until the closure of the settlement day.
- E-2 day: on this day, securities account managers are required to submit to KELER the holders’ data associated with the Ownership identification in line with the Depository Announcement entitled “Cut-off times to receive and execute orders”.
On E-2 day KELER shall forward the payment instruction to the Issuer that also contains the end-of-day account balances on the record date, broken down by Client, and the bank account numbers or cash account numbers as indicated by the Clients where due payments are requested to be made.
- E-1 day: At request, KELER shall forward to the Issuer the Ownership identification data.

- “E” day (event date): The day of payment and the day when the Issuer registers the shareholders.

The Issuer may propose rules of procedure diverging from the above, however, it is not possible to establish shorter periods of time. Any different procedure rules shall apply to the determination of the record date. Order deadline shall be the third working day preceding a record date thus specified.

2.4.2. Management of investment units of a closed-ended investment fund upon expiry

The maturity (FE day) of a closed-end investment fund and the payment related to the units of the fund (E day) are separate. The expiry of the investment fund does not result in the automatic cancellation of the investment unit upon expiry.

2.4.3. Preferential days related to the expiry of a fund

If an investment fund expires - provided that the fund manager did not submit to KELER a statement to the contrary - no account transactions can be completed in relation to the investment units until their cancellation.

- FE-15 day: Statement by the Fund Manager
 - a) on the day of payment (E day) and the record date,
 - b) on the extension or conversion of the investment fund upon expiry,
 - c) whether account transactions in the investment units of the expired investment fund can be completed between FE-6 day and E-3 day.
- Record date -3 working days: Deadline to send the Ownership identification and/or the payment instruction request to KELER. Should the Issuer fail to fulfil this obligation or fulfil it with some delay, KELER Plc. may not be held liable for any resulting damage. If the Issuer executes the order on record date-2, record date-1 or on the record date, the rush surcharge specified by the Fee Regulations effective shall be charged.
- FE-5 day (cum date): The last trading day related to yield payment and principal payment upon expiry of the investment unit listed on the BSE when the unit is traded with the right related to the maturity concerned.
- FE-4 day: If the fund manager provided statement on the conversion of the closed-end fund into an open-ended fund, recording the details of the conversion related to the expiry date of the fund ensures continuous distribution from the record date of the investment unit until the expiry date of the fund.
- FE-3 day: The record date related to the maturity date of the fund. From this day until the payment day (E day) determined by the fund manager, unless the fund manager states otherwise, no account transactions can be completed in the expiring investment unit.
- FE day: The day of fund expiry or conversion.
- E-3 day (record date): Persons are entitled to payment on the maturity date and are registered as holders, if the investment units are held in their securities accounts at

the end of this day. Accordingly, investment units-related securities account transactions can be completed with the right linked to the maturity date concerned until the closure of the settlement day.

- E-2 day: On this day, securities account managers are required to submit to KELER the holders' data related to the Ownership identification in line with the Depository Announcement entitled "Cut-off times to receive, execute and cancel orders".
- On E-2 day, KELER shall forward the payment instruction to the Issuer or its agent, it also contains the end of day account balance amounts on the record date by Client and the bank account numbers or cash account numbers as indicated by the Clients where due payments are requested to be made.
- E-1 day: At request, KELER shall forward to the fund manager the Ownership identification data.
- "E" day (event date): The day of payment and the day when the Issuer registers the shareholders.

KELER is not liable for any damage arising from the failure to fulfil or delayed fulfilment of the obligations stated in the above sections by the Issuer of the investment unit.

3. Retrospective Ownership identification

For dematerialised securities, based on a decision of the Supervisory Authority or a written order of the Issuer, KELER completes retrospective Ownership identification. KELER shall publish retrospective Ownership identifications in KID.

Retrospective Ownership identification can be requested exclusively from the effective date of the amendment of Act CXX of 2001 on the Capital Market (1 July 2006), for the record date of actions starting on or after this date.

3.1. Retrospective Ownership identification based on a decision of the Supervisory Authority

Based on a decision of the Supervisory Authority, retrospective Ownership identification can be completed, which is to be made based on the data effective at the time specified in the decision of the Supervisory Authority.

The securities account manager is obliged to provide the central depository with the identification data and the number of shares held by securities account holders that hold the dematerialised shares specified at the time stated in the decision on the Ownership identification (record date).

KELER completes the Ownership identification for the data submitted by the securities account managers by the deadline stated by KELER.

3.2. Retrospective Ownership identification at the request of the Issuer

If Ownership identification is completed at the request of the Issuer or its agent, the securities account manager forwards to the central securities depository the identification data and the number of shares held by securities account holders that hold the specific dematerialised shares at the time specified in the order of the Issuer (record date) and, where it is a public company, have not given an instruction to prohibit their registration in the Register of Shareholders, not have they requested their cancellation.

3.3. Retrospective Ownership identification based on an order

Ordering a retrospective Ownership identification is possible by completing the Retrospective Ownership identification Order Form in full. (Except for retrospective Ownership identifications completed based on a decision of the Supervisory Authority.)

KELER accepts to perform retrospective ownership identification no earlier than the third working day from an order. If the Issuer requests the performance of retrospective ownership identification within three working days, a rush surcharge as specified in the Fee Regulations shall be charged. The provisions of section 1.3 of this Announcement shall apply to the completion, signing and submission of the order form.

4. Payment instruction

The Issuer or the Issuer's agent may request a list of payment instructions from KELER in respect of corporate actions involving payment.

4.1. Statement of the Account holder

The Client provides to KELER on a form with the title ['Instruction concerning the bank account numbers assigned for the payment-type corporate event'](#) the bank accounts in their ownership for each securities and each currencies where the crediting concerning the payment-type corporate event should take place. KELER includes these account numbers on the payment order as ordered by the Issuer.

If the Client does not specify any bank accounts for crediting or the specified bank account is not active, then the Client shall be responsible for damages resulting from the consequences of lack of any bank account or its inadequacy. For the purposes of the security of securities settlement, KELER, on a risk sensitivity basis, is entitled to request bank statements on the external bank account numbers reported by the Client and the Client shall verify same by presenting the account contract or bank account statements. If KELER acts as a Payment agent concerning the payment-type corporate event engaged by the Issuer, and KELER establishes upon crediting that the Client failed to specify a bank account number or the bank account number given is not adequate, then KELER may open automatically a restricted payment account for the Client in the currency of the payment-type corporate event and the due payment shall be directed to this KELER account. The

right of disposal of the Client over the automatically opened payment account can be exercised, once the screening processes detailed in Pmt. took place successfully and once the account contract was signed by the Client. The Client can use this payment account only in line with the rules for proper bank account use and within the contractual limitations.

Any loss resulting from the failure to provide a bank account number shall be borne by the Client.

The rules applicable to the keeping of the lists of shareholders may vary from Issuer to Issuer. It is the Issuer's responsibility to bring the attention of the shareholder to the special rules of the given list of shareholders, including KELER rules.

4.2. Placing an order for a payment instruction

When placing an order for a payment instruction, the Issuer or the Issuer's agent shall act taking into account the following criteria:

4.2.1. Method of order placement

Ownership identification procedure or payment instruction may be ordered by the Issuer or the Issuer's agent by completing the standard form available on the website of KELER and submitting it by e-mail or by post.

4.2.2. Date of order placement

The action order must be delivered to KELER no later than the third working day (Record date -3 working days) prior to the event record date. If the Issuer executes the order on record date-2, record date-1 or on the record date, the rush surcharge specified by the Fee Regulations effective shall be charged.

4.2.3. Name and signature of the person placing the order

Order forms will only be accepted if they bear the name and the authentic signature of the person authorised to sign for and represent the Issuer or the Issuer's agent. Instead of a copy bearing such a signature, sending an electronically signed (es3 format) copy of the order form by e-mail is also acceptable.

4.2.4. Completion of the order form

Order forms must always be completed in full.

4.3. Sending the list of payment instructions

The list of payment instructions is prepared on the day following the cut-off date of the given action. The list is made in the form specified by the Issuer or the Issuer's agent in the order form.

5. Services related to the provisions of the Shareholders Rights Directive II (SRD II)

KELER uses CAPS (Corporate Action Processing System) as an intermediary for services falling within the scope of the SRD II Directive (and of the legislation transposing it into Hungarian law, namely of Act LXVII of 2019). CAPS provides a link between the Issuers of stock exchange-traded securities and the Account Managers of shareholders.

In CAPS, Issuers simultaneously record all their corporate actions announced through various disclosure channels in order to notify the ultimate shareholders through the Account Managers concerned. It is not possible to use CAPS without a LEI code.

The CAPS interface can be accessed using a suitable Internet browser at the following URL: <https://caps.keler.hu/caps/>.

To use the system, it is necessary to enter into a relevant contract [https://english.keler.hu/Key%20documents/Admission%20forms/tabs/Form%20contracts/\(No.%2037\)%20Agreement%20on%20the%20CAPS%20system%20services/2020_09_03_KELER-37_Agreement-on-the-CAPS-system-services.pdf?download](https://english.keler.hu/Key%20documents/Admission%20forms/tabs/Form%20contracts/(No.%2037)%20Agreement%20on%20the%20CAPS%20system%20services/2020_09_03_KELER-37_Agreement-on-the-CAPS-system-services.pdf?download)).

In the context of concluding the contract, KELER ascertains the power of representation of the person(s) acting on behalf of the Issuer and of the Account Manager and checks the adequacy of their signature, and therefore, if the documents required for identification are not available to KELER or have not been presented during the use of KELER's other services, the client shall provide proof of the above to the satisfaction of KELER.

The Issuer can announce its actions to Account Managers by recording them on the CAPS interface. The purpose of CAPS is to ensure SRD II compliance. The process for ordering action-related dematerialised actions, payment instructions, Ownership identification, or other actions is still required to be completed; there has been no change in that.

In CAPS, the Issuer can inform the market about its current corporate action by completing a template. The type of action, the ISIN code of the relevant security and the specific details of the action must be completed. The system marks the fields that are required for the announcement and those that are necessary for the completeness of an action.

KELER has published the range of message types that can be entered and received and required formal and other requirements on the SWIFT MyStandards interface under the KELER group / SRD subgroup.

KELER's CAPS system provides a link between Issuers and Account Managers in the following cases:

- supporting the conduct of shareholders' meetings
 - sending uniform notices of shareholders' meetings,
 - confirmation of the eligibility to participate in shareholders' meetings,
 - publication of the results of shareholders' meetings
 - confirmation of votes
- Notifications about corporate actions other than shareholders' meetings.

KELER provides the shareholders' data based on the balance of the "Own" sub-accounts held with KELER (i.e. the accounts of final investors); for "Client" sub-accounts it provides the information of the intermediary and transmits the corporate action information / Shareholder identification requests to those that have a securities account with KELER and an account balance of the specific security. In compliance with the SRD II Directive, requests may also be received through intermediaries that do not have an account with KELER directly, however have been entrusted by the Issuer with Shareholder identification.

Task performed by	Task
Issuer	→ Publication of the action in CAPS: - Registration on the interface - Importing the xml file into the CAPS interface
KELER	→ Provides the possibility to announce actions on the CAPS interface / in SWIFT message
	→ Performs the following with regard to requests for Shareholder identification actions requested by Sub-Custodians or other Intermediaries: * responds with regard to the holdings on the Client's own account affected by the action * forwards the Shareholder identification request action to Partners having holdings
	→ Generation of stock certificates in CAPS at the request of the Account Manager
Account Manager	→ The Issuer monitors the actions announced on its own CAPS interface. The Issuer informs the customers to whom it provides account management services about the corporate actions announced here in accordance with its own internal procedure.
	→ Requesting a stock certificate for own holdings in case of participation in a shareholders' 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 collectively referred to as "Issuer") and the chain of intermediaries (central securities depository, banks, investment service providers), which is aimed at informing the Issuer of the account holders/final investors and the securities held by them. All intermediaries shall provide the balance of accounts of the ultimate investor (own segregation) and shall forward the request to the owners of the client accounts. The owners of the client accounts (other intermediaries) act the same way as long as the request reaches the intermediary of the ultimate owners.

KELER arranges the shareholder identification fully through the CAPS system irrespective whether Hungarian or foreign securities are concerned. Accordingly, all information are accessible concerning the shareholder identification in the CAP system.

The issuer sends the request for shareholder identification through the chain of intermediaries through the first intermediary (for Hungarian securities this is KELER) up until the last intermediary. Accordingly, KELER may act in two roles in the process of shareholder identification: as intermediary or as a proxy of an issuer to collect replies.

5.1.1. From an intermediary to KELER

KELER acts as intermediary if the issuer engaged an actor other than KELER for Hungarian or foreign securities for the collection of the replies of the intermediaries. The Issuer initiates a shareholder identification request, which is received by KELER ISO 20022 format through SWIFT. KELER responds to the shareholder identification request in an ISO 20022 format message, providing the balances on the accounts of the partners having own securities account with KELER and the details of the securities' holder. It forwards the shareholder identification request to the client balances.

5.1.2. Relationship between KELER and intermediaries

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

Record date:

The issuer determines the record date and the shareholder identification pertains to the status at the end of this date. The record date can be up to 12 months earlier than the filing of the former request.

For a past record date:

A shareholder identification request submitted by an intermediary shall be forwarded by KELER immediately, but no later than by the closure of the day of receipt of the request, to all of its account holders that had a balance with KELER of the given security on the record date. If the request is received after 16:00, KELER shall forward the request by 10:00 on the next settlement date at the latest.

KELER shall handle any change related to the request according to the above procedure.

For a future record date:

A shareholder identification request submitted by an intermediary shall be forwarded by KELER immediately, but no later than by the closure of the day of receipt of the request, to all of its account holders that had a balance with KELER or any pending transaction regarding the given security on the record date. If the request is received after 16:00, KELER shall forward the request by 10:00 on the next settlement date at the latest.

By the record date, KELER sends it to all KELER account holders to whom it has not yet been sent and who will have a balance or will be affected by a transaction in the relevant security.

KELER shall handle any change related to the request according to the above procedure.

The request is transmitted in electronic format by KELER in ISO 20022 format that is downloadable from the CAPS platform in xml format (seev.045 - shareholder identification request message). For clients with SWIFT connection it is also possible to receive the message through SWIFT if this is requested in the above contract and if they initiate the information double check and key change at KELER.

The intermediary shall send the reply in all cases to the DsclsrRspnRcpt (Disclosure Response Recipient) as detailed in the shareholder identification requests no. seev.045.

5.1.3. Shareholder identification conducted by KELER

If the issuer of a Hungarian publicly traded share decides to engage KELER with the collection of the replies concerning the shareholder identification, then KELER is engaged for the initiation of the shareholder identification through the CAPS system. The issuer can do so by selecting the “Shareholder identification arrangement” from the “New corporate event” menu item.

Please note that this function is not the same as Ownership identification and the registration of this event is subject to the fee as detailed in the Fee Schedule of KELER.

KELER forwards the request for shareholder identification to the intermediaries keeping the client accounts and having a balance with the concerned securities. The balances of the own account are forwarded by KELER from its own records to the issuer and the intermediaries shall not include the balance of these in their reports. This is applicable to all intermediaries in the chain, i.e. in order to prevent duplication intermediaries shall not include the balance of own segregated accounts in the replies (unless the own and client balances are not segregated at the account manager).

The reply for the shareholder identification from intermediaries without direct account connection with KELER can be sent only through SWIFT to KELER. To establish connection the intermediary shall initiate the SWIFT key change at KELER.

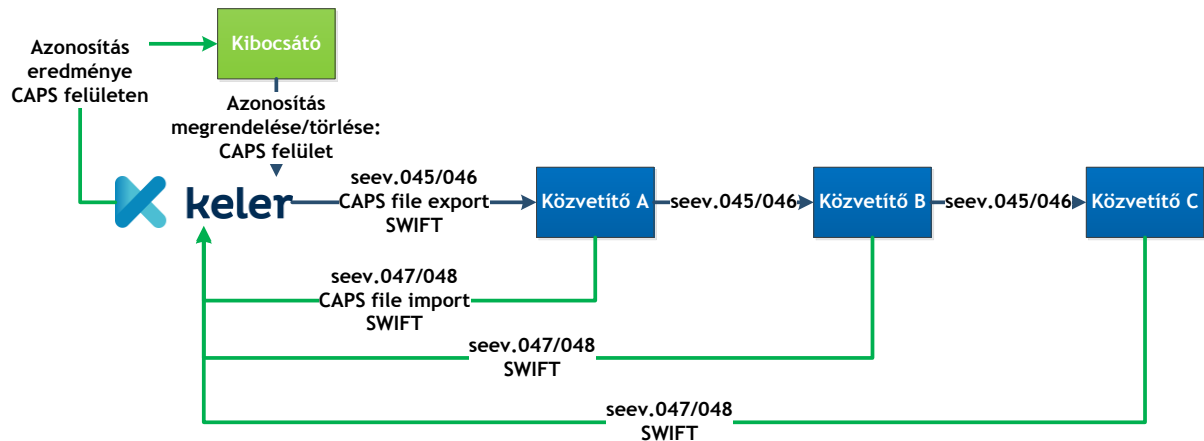
Pursuant to the Enforcement decree the intermediary shall forward requests received before 4 pm the same day, while the requests received after 4 pm the next day before 10 am to the next intermediary. KELER sends a confirmation on the formal correctness of the messages sent by the intermediaries to the reporting intermediary.

KELER determines a deadline of 15 settlement days¹ from the record date (for requests filed for past record dates 15 settlement days from the filing of the request) for the replies to the requests so that all members of the chain have sufficient time to provide answers. After the expiry of the deadline (5 pm on the day of the deadline) KELER checks the received replies based on its own account management database and in comparison to other replies received (after 6 pm on the day of the deadline), then KELER makes the ownership information available for the issuer in the CAP system.

KELER indicates all received shareholder identification information in CAPS irrespective of the result of the control. The issuer initiating the identification can view the received information on the screen “Corporate event” by clicking on the icon “Actions” belonging to the given event under the item “Shareholder information”. In the menu item “Shareholder information” it is possible to view the information or to export same in xls format. Prior to the above control the received shareholder information can be viewed but in the status

¹ The calendar day when KELER provides settlement or central depository services.

“Being valuated” and after the control the successful validation or the reason for the unsuccessful validation is shown. During a successful control the incoming shareholder information replies (so-called child record) is attempted to be paired up with the connected information sent by the intermediary (so-called parent record) and the connection is shown in the list by the serial number of the child and parent records. KELER does not enquire at intermediaries who did not send a reply or sent false information.



5.2. Services related to shareholders' meetings

5.2.1. Notice of shareholders' meeting

5.2.1.1. Sent by the Issuer to the issuing securities depository

- The Issuer records or uploads by means of an import file the shareholders' meeting notice in KELER's CAPS system no later than on the day of sending/publishing the invitation. The Issuer shall record any changes related to the action in CAPS.

5.2.1.2. Relationship between KELER and intermediaries

- KELER shall forward the shareholders' meeting notice delivered by the Issuer immediately, but no later than by the closure of the day of receipt of the notice, to all account holders that have a balance with KELER of the given security on the day of the announcement in CAPS. If the notice is received after 16:00, KELER shall forward the notice by 10:00 on the next settlement date at the latest. Balances are queried by the system twice every day until the record date. By the record date, KELER will send information about the action to all KELER account holders to whom it has not yet been sent and have a new balance between the day of the announcement and the record date. KELER will not send a notice for transactions the settlement of which is in progress but have not yet been settled by the record date.
- The notice will be forwarded in electronic format via KELER CAPS. KELER shall handle all changes related to the notice according to the above procedure.

5.2.2. Confirmation of the eligibility to participate in the shareholders' meeting

5.2.2.1. Determination of eligibility - closing balance as at the record date

- Eligibility is determined on the basis of the closing stock on the record date of the shareholders' meeting

5.2.2.2. Eligibility notification

- KELER sends an eligibility notification to all KELER account holders that have a balance of the given security on this sub-account.
- KELER also issues the eligibility notification on paper (at the request of the account holder) and KELER also makes it available to the account holder in the form of a seev.003 message on the CAPS interface in a downloadable format.
- The Register of Shareholders ("*Részvénykönyv*") continues to be the basis for eligibility for participation in shareholders' meetings, and not the above notification.

5.2.3. Confirmation of the voting and the recordal of the votes and their set-off

Act no. LXVII of 2019 prescribes for issuers to confirm the receipt of votes received through telecommunication devices and their recordal and set-off and orders intermediaries to forward the confirmations if a voting in a conference general assembly as detailed in § 3:281(3) of Ptk. is held with telecommunication devices.

Once the vote is received by the issuer, it has to be confirmed in all cases (Enforcement decree, chart 6, seev.006 message). The confirmation of the registration and set-off of the vote (Enforcement decree, chart 7, seev.007 message) shall be forwarded to the shareholder, if the shareholder requested it from the issuer within 30 days from the date of the general assembly. The issuer can decide to send the confirmation for all votes received electronically.

The issuer can forward the above messages to KELER through the CAPS system in the "Management of corporate events" menu item by selecting the adequate general assembly and by clicking the in the "Actions" menu item to the "Confirmation of the receipt of votes" or to the "Confirmation of the set-off of votes" by uploading the seev.006 and seev.007 messages. it is the issuer's task to prepare the seev.006 and seev.007 messages in advance. A file upload screen is displayed where you browse the file and the recipient intermediary shall be chosen from the list. The concerned intermediary can be determined from the shareholder list. Only those intermediaries are shown in the list that participate in the CAPS system and that have currently a balance in connection with the given general assembly. The system carries out a formal check when a file is uploaded (based on ISO 20222 requirements) and transmits the file to the selected intermediary. The issuer can find all the messages uploaded by them in the system in the "Corporate event messages" menu item by filtering to the message type "Publication of the status of general assembly votes" or to "Publication of set-off of general assembly votes".

Act no. LXVII of 2019 prescribes to intermediaries, including KELER to forward the confirmations to the clients. KELER makes accessible the general assembly messages to the intermediaries through the CAPS system or through SWIFT for clients who requested information through SWIFT. The seev.006 and seev.007 messages are displayed on the “Corporate event messages” screen in CAPS for KELER securities account owners. The owners of KELER securities accounts can only see the messages addressed to them.

KELER uses standard seev.006 and seev.007 messages and the system changes the settings of the received files only for the AppHdr (head.001.02 message), BusinessMsgId and To fields when they are forwarded to the intermediaries, otherwise the data content of the messages remains unchanged.

5.2.4. Publication of the results of shareholders' meetings

The Issuer can record the results of shareholders' meetings on the CAPS interface, of which all relevant Account Managers are also notified on the system interface.

KELER will also make the results of shareholders' meetings available to Account Managers in the form of a seev.008 message in ISO 20022 format in an exportable form.

5.3. Notification of corporate actions other than shareholders' meetings

5.3.1. Sent by the Issuer to KELER

The Issuer shall record the notice of the corporate action in KELER's CAPS system at the same time as publishing the information. The Issuer shall record in CAPS any changes related to the action.

5.3.2. Relationship between KELER and intermediaries

KELER shall forward the notice of the corporate action uploaded by the Issuer immediately, but no later than by the closure of the day of receipt of the notice, to all account holders that have a balance with KELER of the given security on the day of the announcement or had a balance on the record date (where it is an earlier date). If the action is uploaded in KELER CAPS after 16:00, KELER shall forward the notice by 10:00 on the next settlement date at the latest. KELER shall continuously monitor which CAPS account manager has a new balance until the record date. In this case, KELER sends a notification about the new position (for account managers that did not have a balance previously) twice a day, after 8:00 and 17:00. If the action is modified by the Issuer between 8:00 and 17:00, Account Managers that already have a position and have been notified of the action will receive a notification of the change containing information on the balance queried at 8:00. If the change is made by the Issuer between 17:00 and 8:00, Account Managers that already have a position and have been notified of the action will be notified of the balance queried after 17:00.

The notification shall be forwarded electronically, in ISO 20022 format, regardless of the communication channel. All messages are time-stamped. It is forwarded using the CAPS interface and can be downloaded in SWIFT ISO 20022 format from the interface.

KELER shall handle all changes related to the notice according to the above procedure.

5.3.3. Corporate actions managed

KELER provides notification services in connection with the following corporate actions (other than shareholders' meetings):

- i. Bonus Issue (BONU)
- ii. Reporting a Change in Data (CHAN)
- iii. Mandatory Conversion (CONV)
- iv. Reduction of Share Capital by Reduction of Par Value (Decrease in Value - DECR)
- v. Delisting (DLST)
- vi. Ownership identification (DSCL)
- vii. Cash Dividend (DVCA)
- viii. Share Dividend (DVSE)
- ix. Share Capital Increase by Par Value Increase (INCR)
- x. Liquidation Payment (LIQU)
- xi. Merger (MRGR)
- xii. Redenomination (REDO)
- xiii. Spin-Off (SOFF)
- xiv. Stock Split (SPLF)
- xv. Reverse Stock Split (SPLF)
- xvi. Voluntary Tender (TEND volu)
- xvii. Mandatory Tender (TEND mand)

Definition of Terms

CAPS Account Manager: A KELER securities account holder that is authorised to log into the CAPS system and is also entitled to open a client sub-account.

Starting day of unauthorised stock exchange trading: Cut-off date-1 settlement day according to the BSE settlement calendar. CAPS calculates it automatically from the cut-off date.

Value date: The date of the securities transaction associated with the action. An optional date that may be chosen in KELER's settlement calendar but cannot be a past date.

Security name: The name of the security to which the action relates.

Cut-off date: An optional date that may be chosen from the BSE's settlement calendar but cannot be a past date.

ISIN: International Securities Identification Number (ISIN) assigned to the security in accordance with ISO 6166 or a method compatible with it. The ISIN of the security to which the action relates.

Payment value date: The date of the financial transaction associated with the action.

Additional data: Data and information on the action provided in English and/or Hungarian that the Issuer deems relevant. If the field is completed, we recommend using both languages for easier processing.

Availability of the Issuer's Announcement (URL): The URL address of the official announcement of the Issuer regarding the specific action. Required information when announcing an action.

ISIN code of underlying security: The ISIN code of the security that the shareholder involved in the action is entitled to receive during the action in addition to the existing shares.

Name of underlying security: It is populated automatically by CAPS based on the ISIN.

Corporate action: An action initiated by the Issuer or a third party that involves the exercise of rights attaching to the share and either affects the underlying share or does not affect it, e.g. a share split or a shareholders' meeting.

Rules for handling fractional shares: For corporate actions in which another security is credited in connection with a right attaching to the security concerned, the Issuer may specify the set of rules to be applied to the fractional shares created after the stock split. Either it does not handle fractional shares or can choose to pay fractional shares in cash.

Last trading day on BSE: The last day on which shares can be purchased and transferred together with the rights to participate in the corporate action.

i. Bonus Issue (BONU)

Shareholders receive additional securities included in the Issuer's product range in addition to their existing ordinary shares in proportion to their holdings.

ii. Reporting a Change in Data (CHAN)

Reporting a change in data is not a corporate action and does not involve securities or cash flow. During the action, usually a change in the company name, registered office or address is announced.

iii. Mandatory Conversion (CONV)

Conversion of securities (usually convertible bonds or preference shares) into another form of securities (usually ordinary shares) at a pre-determined price/ratio.

iv. Reduction of Share Capital by Reduction of Par Value (Decrease in Value - DECR)

Reduction of the nominal value of a security. The number of publicly traded securities remains unchanged. This action may also involve a cash payment to shareholders.

v. Delisting (Trading Status: Delisted - DLST)

The security does not meet the requirements of the stock exchange and will be delisted.

vi. Ownership identification (Disclosure - DSCL)

Request to provide the details of shareholders, including details of their shareholdings and personal data of the ultimate shareholders.

Please also post retrospective Ownership identifications on the CAPS interface.

Retrospective Ownership identifications can be announced on the CAPS interface retrospectively up to July 2006.

Announcing an Ownership identification does not mean ordering the service; an order must be placed for this action by completing the appropriate form.

vii. Cash Dividend (DVCA)

Distribution of cash from the company's profits to shareholders in proportion to their shareholdings.

viii. Stock Dividend (DVSE)

Dividend payment in securities.

ix. Share Capital Increase by Par Value Increase (INCR)

Increasing the nominal value of a specific security without changing the number of outstanding securities.

x. Liquidation Payment (LIQU)

Liquidation of an issuing company without a legal successor, during which cash is distributed in proportion to the shareholdings, while cancelling the security.

xi. Merger (MRGR)

Merger of two or more companies initiated by an Issuer. A cash payment may accompany the exchange of outstanding securities.

xii. Redenomination (REDO)

Change in the currency in which a security is denominated.

xiii. Spin-Off (SOFF)

The establishment of a new company, while dividing an existing business by the issuance of new shares.

xiv. Stock Split (SPLF)

An increase in the number of outstanding shares of a company without a change in its market value. The price and par value of the shares decrease proportionately.

xv. Reverse Stock Split (SPLR)

Reduction in the number of shares issued by a company without a change in the number of shareholders. The price and nominal value of the shares increase proportionately.

xvi. Takeover bid (Tender - TEND), voluntary

A takeover bid made by a third party to shareholders. During this action, the ultimate shareholder may offer to sell their shares to the party making the bid.

xvii. Squeeze-out (Tender - TEND), mandatory

If, as a result of a takeover bid, the majority shareholder of a joint stock company obtains more than 90% of the votes, a so-called “squeeze-out” procedure may take place. A squeeze-out procedure may be initiated by the bidder, if they wish to be the sole shareholder of the company, in the context of which they may exercise an option to purchase in respect of the shares not acquired through the takeover bid. If the minority shareholders do not transfer their shares on time, the company will declare them invalid, while issuing new shares and set aside the consideration for the shares for the minority shareholders. Pursuant to the rules of the BSE, the shares will be automatically delisted from the stock exchange after the expiry of the deadline set for the transfer of the shares.

The actions announced by the Issuer are also available at KELER's website (<https://english.keler.hu/Corporate%20actions/>).

6. Annexes**6.1. Ownership identification Order Form**

www.keler.hu/Dokumentumtár/Formanyomtatványok/Társasági események/1_Tulajdonosi-megfeleltetes-kibocsato-altali-megrendelese.pdf

6.2. Retrospective Ownership identification Order Form

www.keler.hu/Dokumentumtár/Formanyomtatványok/Társaság események/2_Visszamenoleges-tulajdonosi-megfeleltetes-megrendelese.pdf

6.3. List of Payment Instructions Order Form

www.keler.hu/Dokumentumtár/Formanyomtatványok/Társasági események/4_Kifizeteshoz-kapcsolodo-kibocsatoi-rendelkezes-demat-ep-sorozathoz.pdf