



ATHEXGROUP
Athens Exchange Group

Frequent Questions & Answers for the ATHEXCSD Shareholder Identification Service as a Provider under the SRDII

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TABLE OF CONTENTS

DOCUMENT ID	2
DOCUMENT REVISION TABLE	2
1 INTRODUCTION	4
2 QUESTIONS ABOUT THE FUNCTIONING OF THE IDENTIFICATION SERVICE	5
2.1 HOW AN INTERMEDIARY USER RECEIVES ACCESS CODES TO THE AXIA E-SHAREHOLDERS MEETING PLATFORM;	5
2.2 CAN A USER - NATURAL PERSON OBTAIN CODES FOR MORE THAN ONE PARTICIPANT/INTERMEDIARY;	5
2.3 WHAT ARE THE BENEFITS FOR AN INTERMEDIARY OF GAINING ACCESS TO ATHEXCSD'S AXIA E-SHAREHOLDERS MEETING PLATFORM?	5
2.4 WHAT IS THE FLOW OF A LISTED ISSUER SHAREHOLDER IDENTIFICATION REQUEST THROUGH ATHEXCSD IN ITS ROLE AS ISSUER AGENT? 6	
2.5 HOW DOES THE INTERMEDIARY SEND A RESPONSE TO A SHAREHOLDER IDENTIFICATION REQUEST TO ATHEXCSD AS AN ISSUER AGENT? 6	
2.6 WHAT ACTIONS MUST BE TAKEN BY THE INTERMEDIARY IN CASE THAT HE FINDS THAT THE RESPONSE HE SENT NEEDS CORRECTION?7	
2.7 HOW DOES THE INTERMEDIARY CHECK THROUGH THE AXIA E-SHAREHOLDERS MEETING PLATFORM THAT THE IDENTIFICATION OF THE SHAREHOLDERS SUBMITTED WITH THE RESPONSE FILE IS SUCCESSFUL?	7
2.8 WHEN SUBMITTING A RESPONSE FILE TO A REQUEST FOR IDENTIFICATION BY AN INTERMEDIARY, HOW IS HE INFORMED OF ANY REJECTIONS OR ERRORS IN THIS FILE?	7



1 INTRODUCTION

This text is an attempt to gather and answer the questions of the Participants and the Intermediaries about the beneficiaries' identification service of SRDII.

The text will be updated and sent with the addition of new questions/answers. The aim is to answer as many questions as possible from Participants and Intermediaries about the operation of the service.



2 QUESTIONS ABOUT THE FUNCTIONING OF THE IDENTIFICATION SERVICE

2.1 How an Intermediary user receives access codes to the AXIA e-Shareholders Meeting platform?

Answer: The Legal Representative of the Participant/Intermediary submits to ATHEXCSD the relevant password issuance application, which can be found [HERE](#), according to the corresponding instructions ([HERE](#)). The application is required to be submitted signed by the Legal Representative with a certification of the authenticity of his signature in accordance with the procedures followed by each country. In the case of a Participant or Intermediary that has not disclosed its details to ATHEXCSD by RMA key exchange via the SWIFT network, the following documents of the requesting Legal Entity are required to be attached to the above application:

- o Certificate of good standing from the Familiar Registry (Good Standing) and
- o Certificate/attestation of legal representation.

2.2 Can a user - Natural Person obtain codes for more than one Participant/Intermediary?

Answer: At this time, each user - Natural Person can receive access codes for only one Intermediary. Each Intermediary may authorize up to three Natural Persons - its executives - to access the service as users.

2.3 What are the benefits for an Intermediary of gaining access to ATHEXCSD AXIA e-Shareholders Meeting platform?

Answer: It is possible for the Intermediary to submit his answer to a shareholders' identification request in the following alternative ways: in xml format, in csv format or through a screen entry (data entry). Also, the Intermediary can monitor the identification status of the shareholders included in the response file, i.e. whether the shareholders are fully identified or not so that in case they are not fully identified, the Intermediary can make relevant corrections and submit a new response file.

2.4 What is the flow of a Listed Issuer shareholder identification request through ATHEXCSD in its role as Issuer agent?

Answer: ATHEXCSD, after receiving an identification request from an Issuer, sends to the Participant a "seev.045" message in xml format via swift Finplus or by email, depending on the Participant's choice.

Participants immediately forward the request to their clients – Intermediaries and respond directly to ATHEXCSD either via Swift FINplus or via the AXIA e-Shareholders Meeting platform.

The Intermediaries of the Intermediaries chain respectively forward the request to their clients – Intermediaries and respond directly to ATHEXCSD either via Swift FINplus or via the AXIA e-Shareholders Meeting platform, until the shareholders at “BENE” (Beneficiary Owners) level are disclosed.

ATHEXCSD in response to the Shareholder Identification Disclosure Response file (seev.047) sends to each Intermediary a Shareholder Identification Disclosure Response Status Advice file (seev.049) informing them of the acceptance or rejection of their response.

2.5 How does the Intermediary send a response to a shareholder identification request to ATHEXCSD as an Issuer Agent?

Answer: Any Intermediary may send a response to a shareholder identification request in the following ways:

- Through SWIFT FINplus

Prerequisite: Key exchange with ATHEXCSD following an RMA Request from a Participant or Intermediary, using the following ATHEXCSD details:

BIC: HCSDGRAAXX

DN on SWIFT FINplus: ou=xxx,o=hcsdgraa,o=swift

- Through AXIA e-Shareholders meeting platform:

- i. with direct submission of files by the Participants/Intermediaries in xml and/or CSV format (relevant sample you can see [HERE](#)).
- ii. with registration (data entry) of the data on a new screen (through the “SI RESPONSE FORM” screen).

Prerequisite: Obtain access codes to the AXIA e-Shareholders Meeting platform from a Participant or Intermediary.

2.6 What actions must be taken by the Intermediary in case that he finds that the response he sent needs correction?

Answer: If a response file has been submitted with message seev.047, it corrects/cancels the previous submission (automatic creation and sending of message seev.048) and resends response (message seev.047). If he has submitted a reply through screen, the correction/cancellation and resubmission is also done through screen. In particular, he can select the corresponding file and request its cancellation. It is clarified that the cancellation can also be done for an individual registration. It is pointed out that in order to send a new response to an identification request, the previous response must be cancelled.

2.7 How does the Intermediary check through the AXIA e-Shareholders Meeting platform that the identification of the shareholders submitted with the response file is successful?

Answer: If the Intermediary has submitted a response file containing beneficiaries, the check can be done on the "Reconcile Report" screen in the "Leaf nodes" section, where in the corresponding beneficiary record can check the YES/NO indication that appears in the "Fully identified" field ".

2.8 When submitting a response file to a request for identification by an Intermediary, how is he informed of any rejections or errors in this file?

Answer: In case the Intermediary receives rejections/errors in an identification response, he searches the file by date in the “Logging” screen and the errors are displayed. Through the



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“Action” option, a csv file is generated with the total errors of the file per line. He corrects his file, changes the file name, and resubmits it.