

FAQ

IDENTIFICATION OF LAST BENEFICIAL OWNERS

February 2022

Identification of last beneficial owners

1. Where can I find documentation related to the service of Identification of last beneficial owners?

In the public area of the Iberclear's website, you can find all the documentation related to the services offered by Iberclear derived from SRD2. The link is as follows:

<https://www.iberclear.es/ing/Services/Beneficial-Owners-Identification>

2. Is there an email address to direct any inquiries?

Yes, participants and intermediaries should direct their inquiries to iberclear.srd2@grupobme.es

For issuers, the authorized address is emisoresiberclear@grupobme.es

3. When will the service of identification of last beneficial owners be available in the Production environment?

The service of Identification of last beneficial owners is available from June 7, 2021.

Participants

1. What do participants have to do after receiving a request of identification of last beneficial owners?

If participants receive a request of last beneficial owners:

1. They have to respond using the usual channels.
2. They must transmit the request of identification of last beneficial owners to those clients or shareholders who are identified as intermediaries in the chain of custody (NOMI), in order that they can respond to this request directly to Iberclear.

2. Do participants have to register at the Online Site?

No, participants do not have to register in the Online Site or carry out any procedure in it. The Online Site has been enabled for those intermediaries that do not have a connection with Iberclear. For this reason, it is necessary that participants urge their clients, that are intermediaries, to interact with the Online Site. Besides, it is important that the participants provide intermediaries with all the information related to the service of identification of last beneficial owners.

3. Can participants communicate information by name and account of their intermediaries?

Yes, participants may communicate information by name and account of their intermediaries, using the usual channels. To do this, it will be necessary to fill in the connectivity form for SRD2 indicating the BICs and / or LEIs of the intermediaries on behalf they are going to communicate. This form can be found in the public area of the Iberclear's website.

1. What do intermediaries have to do after receiving a request of identification of last beneficial owners ?

If a request for identification of last beneficial owners has been received, intermediaries can respond through SWIFTNet FINplus (DN: ou=xxx,o=ibrcesmm,o=swift) or using Iberclear's Online Site. In the message of request of information of last beneficial owners, intermediaries can find the link to the Online site.

2. Do intermediaries have to register and use the Online Site ?

Yes, unless the intermediaries use the FINplus channel. The Online Site has been enabled for intermediaries that have no connection with Iberclear. It is necessary for intermediaries to register in the Online Site as soon as possible in order to request to establish direct connectivity with Iberclear or transmit the files directly through the online site. The access links to the Online Site for the different environments are the following:

Production: <https://iberclear.administracionelectronica.net/SedeElectronica/info/inicio.do#no-back-button>

Test: <https://iberclear.indenova.eu/SedeElectronica/wizard.do#no-back-button>

3. How transmit the information through the Online Site?

To access to the Online Site, it will be necessary to have a digital Certificate, in case you do not have please contact iberclear.SRD2@grupobme.es . Once registered in the Online Site, the intermediary may choose one of these options to respond to the identification request:

1. Through the Online site, intermediaries may request to establish a SWIFTNet FINplus, SWIFTNet FileAct or SFTP communication channel with Iberclear. Information regarding last beneficial owners will be communicated in ISO20022 formats, through these channels.
2. Sending the information to Iberclear directly through the Online site: Intermediaries may send the information in ISO20022 format or in proprietary format (CSV template).

4. Should intermediaries transmit the message through the chain of custody?

Yes, intermediaries must transmit the last beneficial owners' identification request message throughout the chain of custody, when their clients are also intermediaries, and not last beneficial owners, who custody securities on behalf of clients (NOMI), and therefore, must answer the request for identification of their last beneficial owners.

Issuers

1. How do Issuers request the service of identification of last beneficial owners?

Issuers can request the identification of last beneficial owners service through BME-PC. If they have any problem, they should contact emisoiresiberclear@grupobme.es

2. Do Issuers have to register at the Online Site?

No, Issuers do not have to register in the Online Site or carry out any procedure in it. The Online Site has been enabled for those intermediaries that do not have a connection with Iberclear.

3. How will issuers receive information regarding the service of identification of last beneficial owners?

Issuers will receive the information of last beneficial owners through the usual channels established with Iberclear.



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