

# General Meeting (GM) Service

## Manual for KDPW Participants

Project: *Alignment of KDPW with the requirements of the SRD Implementing Regulation*

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### Document history

Date	Version	Author	Description
20.03.2020	1.0	KDPW S.A.	Creation of document.
15.05.2020	1.1	KDPW S.A.	Changes: <ul style="list-style-type: none"><li>▪ Update concerning the transmission of ISO20022 messages separately for each ISIN code involved in the General Meeting event.</li><li>▪ Fixing the default value of the quorum requirement indicator as 'false'.</li><li>▪ Defining the method of enrolment of shareholders to participate in a GM in the eVoting application.</li><li>▪ Editorial corrections.</li></ul>

## 1. BACKGROUND

In view of the entry into force on 3 September 2020 of the Act of 16 October 2019 amending the Act on Public Offering and the Conditions of Introducing Financial Instruments to Organised Trading Systems, and on Public Companies and certain other Acts implementing Article 3a, Article 3b and Article 3c of Directive 2007/36/EC<sup>1</sup> amended by Directive (EU) 2017/828<sup>2</sup> and Commission Implementing Regulation (EU) 2018/1212<sup>3</sup> of 3 September 2018 laying down minimum requirements implementing the provisions of Directive 2007/36/EC of the European Parliament and of the Council as regards shareholder identification, the transmission of information and the facilitation of the exercise of shareholders rights, KDPW is working to align the general meeting services with those provisions.

Furthermore, as a part of the work, KDPW is planning to implement ISO20022 as the single communication standard in general meeting services for companies whose shares are recorded in the depository system. As a result, the planned changes to communications with KDPW participants will apply both to companies for which KDPW is the issuer CSD (central securities depository) and companies for which KDPW is the investor CSD, whether or not such companies are subject to the Directive and the Implementing Regulation.

<sup>1</sup> <https://eur-lex.europa.eu/legal-content/pl/TXT/?uri=CELEX%3A32007L0036>

<sup>2</sup> <https://eur-lex.europa.eu/legal-content/PL/TXT/?uri=CELEX%3A32017L0828>

<sup>3</sup> <https://eur-lex.europa.eu/legal-content/PL/TXT/PDF/?uri=CELEX:32018R1212&from=EN>

KDPW’s alignment measures will ensure the exchange of information between KDPW on the one hand and companies and direct participants on the other hand as necessary to provide general meeting services.

Status quo:

1. Information is exchanged between KDPW and direct participants managing securities accounts and/or omnibus securities accounts by means of KDPW’s proprietary messages.
2. Information is exchanged between KDPW and domestic public companies for which KDPW is the issuer CSD by means of the General Meeting application.
3. General meeting services are provided in two modes, which determine the requirements and the process:
  - Basic mode – Based on limited mandatory information requirements for companies. Distribution of basic information including general meeting notifications and receipt of information concerning persons entitled to participate in a general meeting according to the applicable provisions of the Commercial Companies Code and KDPW’s requirements.
  - Extended mode – Based on extended mandatory information requirements for companies. Supports the distribution of complete information including general meeting notifications and receipt of information concerning persons entitled to participate in a general meeting according to the applicable provisions of the Commercial Companies Code and KDPW’s requirements. In addition, the extended mode and the eVoting application dedicated to shareholders and proxies ensure fulfilment of all the SRD requirements including: (1) distribution of the complete general meeting notification and its updates, as well as the agenda and draft resolutions; (2) receipt of information concerning nominated proxy holders; (3) voting and updating the voting by means of electronic communication; (4) automated confirmation of voting, including voting by proxy; (5) automated confirmation of the recording and counting of votes, including voting by proxy; (6) optional distribution of general meeting results to eVoting application users.
4. The extended mode and the eVoting application are optional, decided at the discretion of the company which registers a general meeting in the KDPW system. Consequently, KDPW is required to develop alternatives (to the extended mode) which enable public companies to comply with the SRD Implementing Regulation and support the exercise of shareholder rights in the basic mode of the general meeting service.

Objective:

1. Information is exchanged between KDPW and direct participants managing securities accounts and/or omnibus securities accounts by means of ISO20022 messages.
2. Information is exchanged between KDPW and companies for which KDPW is the issuer CSD by means of the General Meeting application. Alignment of the rules for the exchange of information between KDPW and companies and extended functionalities for listed companies concern the basic mode of the general meeting service. Alignment of the extended mode as required for consistency of the data model etc. between the basic and the extended mode.
3. The scope of functionalities available for companies in the basic mode of the general meeting service and their mandatory application depends on the legal status of the company and, consequently, the regulations applicable to general meetings held by a given type of companies.
4. The table below presents the categories of companies for which KDPW is the issuer CSD and the scope of general meeting services provided by KDPW, both mandatory (M) and optional (O).

Table 1: Categories of companies v. organising and holding general meetings

Company type	<u>Basic mode</u> List of entitled persons (Commercial Companies Code)	<u>Basic mode</u> SRD processes	<u>Extended mode</u> eVoting
Listed domestic public company (SRD) <sup>4</sup>	Yes (M)	Yes (M)	Yes (O)
Unlisted domestic public company	Yes (M)	No	Yes (O)

<sup>4</sup> According to Article 68i(1)(2) of the Trading Act, a public company is understood as a company established in a Member State whose one or more shares are admitted to trading on the regulated market or foreign EEA regulated market.

Listed foreign public company (SRD)	No <sup>5</sup>	Yes (M)	Yes (O)
Listed foreign public company (Other) <sup>6</sup>	No <sup>7</sup>	Yes (O) <i>Only entitled persons</i> <sup>8</sup>	Yes (O)
Unlisted foreign public company	No	Yes (O) <i>Only entitled persons</i> <sup>8</sup>	Yes (O)
Domestic non-public company	No <sup>9</sup> / Yes (M)	No	No <sup>10</sup> / Yes (O)

5. In the case of (1) listed domestic public companies subject to the SRD regime, the basic mode of the general meeting service includes the provision of basic or complete information including general meeting notifications and receipt of information concerning persons entitled to participate in a general meeting according to the applicable provisions of the Commercial Companies Code, KDPW's requirements and SRD. In addition, it is possible to receive information concerning nominated proxies and the votes of persons holding voting rights. It is also possible for companies to transmit confirmations of the recording and counting of votes at the request of entitled persons and to disseminate general meeting results.
6. In the case of (2) listed foreign public companies subject to the SRD regime, the basic mode of the general meeting service includes the provision of basic or complete information including general meeting notifications and receipt of information concerning persons entitled to participate in a general meeting according to KDPW's requirements and SRD. In addition, it is possible to receive information concerning nominated proxies and the votes of persons holding voting rights. It is also possible for companies to transmit confirmations of the recording and counting of votes at the request of entitled persons and to disseminate general meeting results.
7. In the case of domestic companies other than listed companies subject to the SRD regime, which are or will be subject to the provisions of the Commercial Companies Code, i.e. (3) unlisted domestic public companies and (4) domestic non-public companies, the basic mode of the general meeting service includes the provision of basic information including general meeting notifications and receipt of information concerning persons entitled to participate in a general meeting according to the applicable provisions of the Commercial Companies Code and KDPW's requirements.
8. In the case of foreign public companies not subject to the SRD regime or the provisions of the Commercial Companies Code, i.e. (5) non-EEA listed foreign public companies and (6) unlisted foreign public companies, the basic mode of the general meeting service includes the optional provision of basic information including general meeting notifications and receipt of information concerning persons entitled to participate in a general meeting on the terms applicable to listed foreign public companies subject to the SRD regime. Additional SRD processes are not supported.
9. In the case of companies for which KDPW is the investor CSD, the content of notifications and the terms and conditions of general meeting processing will be defined by the entity managing KDPW's account on a foreign market.

## 2. GENERAL MEETING SERVICE

### 2.1 General

Information will be exchanged with companies by means of the General Meeting application.

Information will be exchanged between KDPW and direct participants managing securities accounts and/or omnibus securities accounts by means of ISO20022 messages.

**Corporate actions will be defined separately for each ISIN code issued to uncertificated bearer shares of a public company<sup>11</sup> or uncertificated shares of a non-public company<sup>12</sup>. KDPW will issue a unique COAF for each event. If a general meeting involves more than one ISIN code, the number of defined events depends on the number of ISIN**

<sup>5</sup> For listed foreign public companies, lists of entitled persons will be available as a part of SRD process execution.

<sup>6</sup> Non-European Economic Area companies for which KDPW is the issuer CSD.

<sup>7</sup> Lists of persons entitled to participate in a general meeting may be processed manually under SRD.

<sup>8</sup> Only includes the receipt of information concerning persons entitled to participate in a general meeting.

<sup>9</sup> As of 1 January 2021, i.e., the effective date of Article 328<sup>14</sup> of the Commercial Companies Code, domestic non-public companies whose shares are recorded in the CSD will be subject to the provisions concerning the organisation of general meetings of public companies.

<sup>10</sup> See above.

<sup>11</sup> As of 1 January 2021, also applicable to registered shares.

<sup>12</sup> As of 1 January 2021.

codes involved in the general meeting. Events defined in `kdpw_stream` per ISIN code will be linked to the COAF identifier per event by CORP (currently CAREf) common to all the events.

Identifiers of messages sent to participants are unique in the lifetime of the defined corporate action, in ascending order.

Messages will use Polish characters with diacritics (ąęść, etc.), in particular in descriptive fields (additional information) and company names.

ISO20022 input and output messages will be encoded: `kdpw_stream` always generates UTF-8 encoded output messages and processes UTF-8 encoded input messages, which is consistent with ISO20022.<sup>13</sup>

## 2.2 Processing

ISO20022 messages used in corporate action processing:

- `head.001.001.02` – Business Application Header
- `seev.001.001.07` – Meeting Notification,
- `seev.002.001.06` – Meeting Cancellation,
- `seev.003.001.06` – Meeting Entitlement Notification,
- `seev.004.001.06` – Meeting Instruction,
- `seev.005.001.06` – Meeting Instruction Cancellation Request,
- `seev.006.001.06` – Meeting Instruction Status,
- `seev.007.001.06` – Meeting Vote Execution Confirmation,
- `seev.008.001.06` – Meeting Results Dissemination.

KDPW publishes message schemas and populating and usage guidelines (ISO20022 usage guidelines) in a dedicated portal on MyStandards, [mystandards.swift.com](https://www2.swift.com/mystandards/#/cmy/qLNrcELGEqr8aC09--Pjg!collections):

<https://www2.swift.com/mystandards/#/cmy/qLNrcELGEqr8aC09--Pjg!collections>

## 2.3 General flow diagram: exchange of data and ISO20022 messages

Below are general flow diagrams of the exchange of data and ISO20022 messages in the general meeting service. Bilateral exchange of information between companies and KDPW takes place via the General Meeting application. Exchange of information between direct participants and KDPW takes place by means of ISO20022 messages.

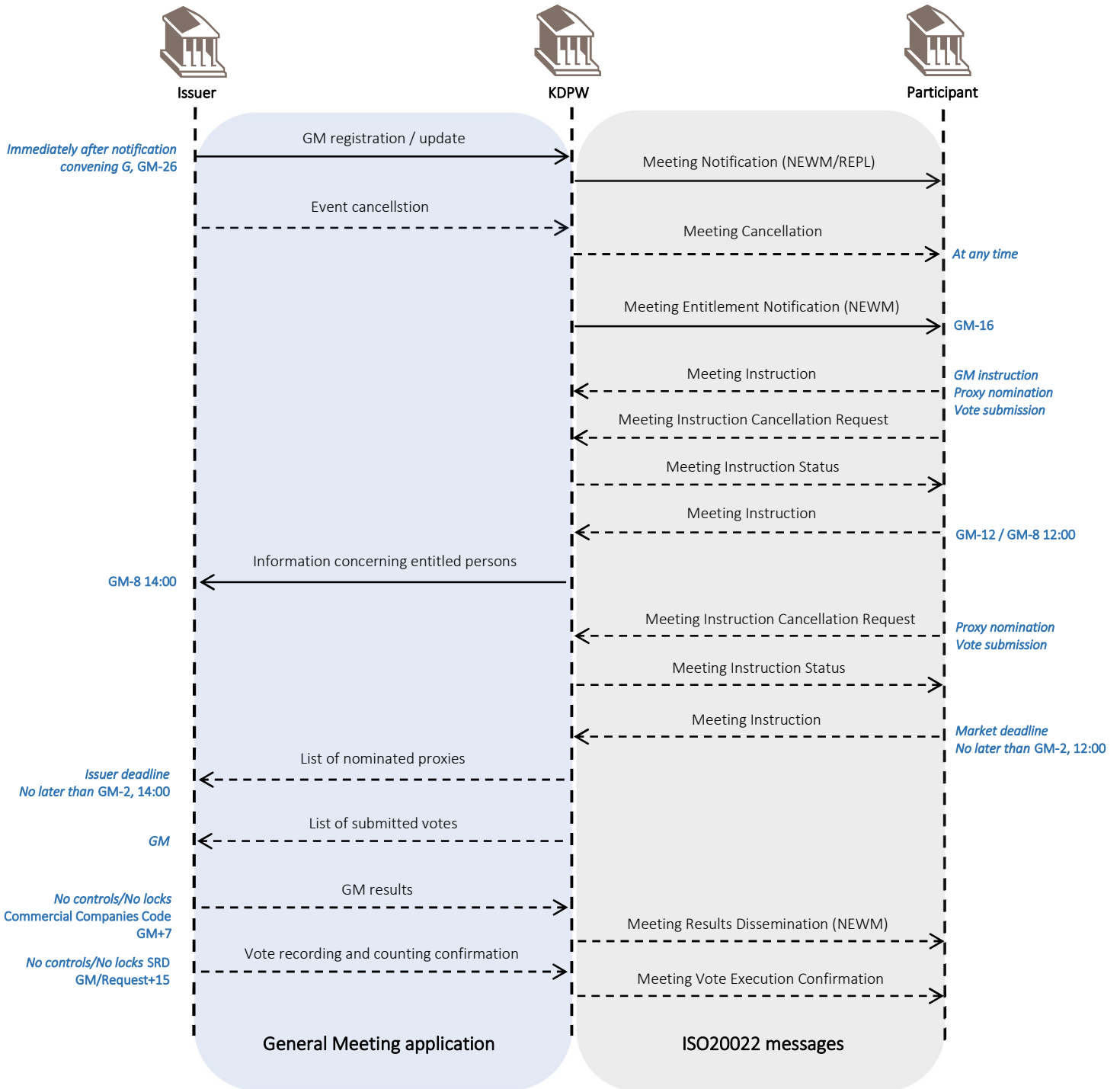
Users choose a communication channel in the service. The available communication channels include ESDK, ESDI Web, and SWIFT. In this context, it should be noted that communications from participants to KDPW may use all available communication channels while communications from KDPW to participants may use only one selected communication channel per type of message.

The flow of information marked with a solid arrow is mandatory, i.e., executed in standard corporate action processing. The flow of information marked with a dotted arrow is optional, i.e., it may be executed in certain cases subject to relevant conditions described below.

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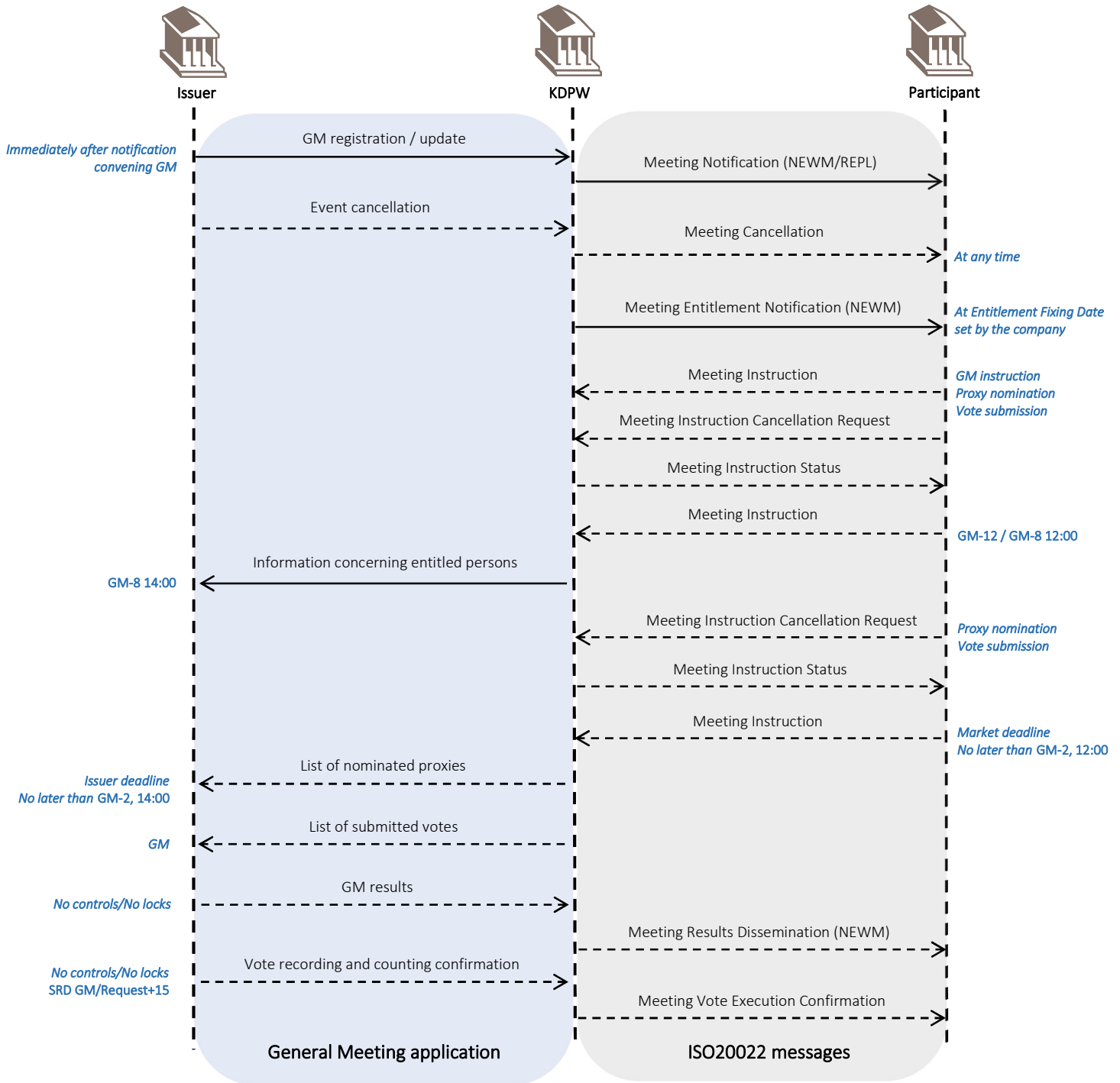
<sup>13</sup> `kdpw_stream` accepts ISO 20022 input messages encoded in UTF-8 whose characters comply with IBM CCSID 870 (LATIN-2 EBCDIC) (<http://www.ibm.com/software/globalization/ccsid/ccsid870.html>). `kdpw_stream` does not check the CharSet tag in BAH; individual characters in messages are checked. Input messages containing non-compliant characters will be rejected by `kdpw_stream`.

Listed domestic public company



To the extent of the processing of the basic general meeting notification and receipt of information concerning persons entitled to participate in a general meeting according to the applicable provisions of the Commercial Companies Code and KDPW's requirements, the flow diagram above also applies to unlisted domestic public companies and, as of 1 January 2021, to domestic non-public companies.

**Listed foreign public company**



To the extent of the processing of the basic general meeting notification and receipt of information concerning persons entitled to participate in a general meeting according to KDPW’s requirements, the flow diagram above also applies to non-EEA listed foreign public companies and to unlisted foreign public companies.

**3. GENERAL MEETING NOTIFICATION**

**3.1 Listed domestic public company**

In the case of listed public domestic companies, the scope of information in a general meeting notification is defined in the SRD Implementing Regulation. According to Article 3b(1)(b) and Article 3b(2) of Directive 2007/36/EC, where

the information referred to in Table 3 of the Annex to Regulation (EU) 2018/1212 concerning the convening of a general meeting is available to shareholders on the issuer's website, the general meeting notice to be prepared by the issuer and transmitted by intermediaries is only required to contain blocks A, B and C, including the URL hyperlink to the website where the information can be found. Additional information in blocks D, E and F is optional.

Failure to provide the full scope of information concerning a general meeting does not affect the ability of persons entitled to participate in a general meeting to exercise all their rights, including the transmission of information to the company along the chain of intermediaries. The absence of complete information concerning the corporate action necessary for automated processing increases the cost and operational risk to KDPW and the other intermediaries who transmit instructions from entitled persons to KDPW. Therefore, we recommend that companies provide the full scope of information in general meeting registration.

If a company only provides the mandatory information (blocks A-C), the general meeting will have the event status Incomplete (Event Completeness Status = INCO). If a company provides all information (blocks A-F), the general meeting will have the event status Complete (Event Completeness Status = COMP).

As a target, in the basic mode of the general meeting service, the General Meeting application will enable companies:

- To transmit, along the chain of intermediaries, an incomplete general meeting notification / update including the mandatory URL hyperlink to the website where the complete general meeting notification can be found, published according to the scope and format defined in Table 3 in the Annex to Regulation (EU) 2018/1212. The provisions of the Commercial Companies Code concerning the procedure for convening general meetings apply, as well; consequently, companies are required to publish a notification concerning the convening of a general meeting on their websites and to publish a current report to that effect in accordance with the Commercial Companies Code;
- Optionally, to transmit, along the chain of intermediaries, a complete general meeting notification / update according to the scope and format defined in Table 3 in the Annex to Regulation (EU) 2018/1212, enabling automated processing, which relieves the company from the obligation to publish the information defined in Table 3 in the Annex to Regulation (EU) 2018/1212 on its website. The provisions of the Commercial Companies Code concerning the procedure for convening general meetings apply, as well; consequently, companies are required to publish a notification concerning the convening of a general meeting on their websites and to publish a current report to that effect in accordance with the Commercial Companies Code;
- To receive information concerning persons entitled to participate in a general meeting by virtue of uncertificated bearer shares according to instructions provided by direct participants to KDPW, presented in the aggregate shareholder list/register made available by KDPW (1); <sup>14</sup>
- To receive information concerning proxies nominated by persons entitled to participate in a general meeting, provided that such proxies are named in the instructions provided to KDPW, presented in the aggregate proxy list/register made available by KDPW (2);
- To receive information concerning votes cast electronically, provided at the request of an entitled person along the chain of intermediaries, provided that such votes are specified in the instructions provided to KDPW, presented in the aggregate vote list made available by KDPW (3);
- To confirm the receipt of votes cast electronically by the company, transmitted via KDPW by intermediaries who transmitted the votes in instructions to KDPW;
- To confirm the recording and counting of votes, provided by the company at the request of shareholders, including the distribution of the confirmation along the chain of intermediaries;
- To provide general meeting voting results by distributing information along the chain of intermediaries.

The table below presents the scope of mandatory data in general meeting registration in the basic mode, provided by the company, indicating whether the requirement is imposed by Implementing Regulation (EU) 2018/1212 or otherwise.

Table 2: Mandatory information required from companies in the general meeting registration form

Information	Application form format	ISO message format	Requirement
Type of general meeting	General/Extraordinary	GMET/XMET	(EU) 2018/1212
Date of the general meeting	ISODateTime	ISODateTime	(EU) 2018/1212

<sup>14</sup> As of 1 January 2021, applicable to all shares of domestic public companies.

Time of the general meeting	ISODateTime	ISODateTime	(EU) 2018/1212
Date of the general meeting notice	ISODate	ISODate	ISO20022
General meeting record date	ISODate	ISODate	(EU) 2018/1212
Company website	URLAdr	URLAdr	(EU) 2018/1212
General meeting address – Street	Max70Text	Max70Text	(EU) 2018/1212
General meeting address – Building number	Max16Text	Max16Text	(EU) 2018/1212
General meeting address – Post code	Max16Text	Max16Text	(EU) 2018/1212
General meeting address – Town name	Max35Text	Max35Text	(EU) 2018/1212
General meeting address – Country	ISOCountryCode	ISOCountryCode	(EU) 2018/1212

Furthermore, in general meeting registration in the basic mode, companies may provide optional additional information facilitating automated processing along the chain of intermediaries. The table below presents the scope of additional data, provided by companies, indicating whether the requirement is imposed by Implementing Regulation (EU) 2018/1212 or otherwise.

Table 3. Additional information not required from companies in the general meeting registration form

Information	Application form format	ISO message format	Requirement
Method of participation by shareholder <i>Multiple methods may be selected</i>	Physical participation Participation by proxy Electronic voting Voting by mail	PHYS PRXY EVOT MAIL	(EU) 2018/1212
Issuer deadline for voting <i>Provided separately for each selected method of participation</i>	ISODate/ISODateTime/UKWN	ISODate/ISODateTime/UKWN	(EU) 2018/1212
Issuer deadline for the notification of participation	Fixed value, business day before GM-7, 12:00	ISODateTime	(EU) 2018/1212
Issuer deadline for the nomination of proxy	ISODate/ISODateTime/UKWN	ISODate/ISODateTime/UKWN	(EU) 2018/1212
Agenda – Unique identifier of the draft resolution	Max35Text	Max35Text	(EU) 2018/1212
Agenda – Title of the draft resolution	Max500Text	Max350Text	(EU) 2018/1212
Agenda – Description of the draft resolution	n/a	Max1025Text	(EU) 2018/1212
Agenda – Content of the draft resolution	Max10000Text	n/a	KDPW – eVoting
Agenda – URL of the complete draft, additional information, etc.	Max200Text	Max2048Text	(EU) 2018/1212
Type of vote	Binding/Advisory <i>Default 'Binding'</i>	BNDG/ADVI <i>Default 'BNDG'</i>	(EU) 2018/1212
Indicator: draft resolution published for information only	YesNoIndicator <i>Default 'No'</i>	YesNoIndicator <i>Default 'false'</i>	ISO20022
Status of the draft resolution	Active/Withdrawn <i>Default 'Active'</i>	ACTV/WDRA	ISO20022
Type of vote	For/Against/Abstention	CFOR/CAGS/ABST	(EU) 2018/1212
Split voting indicator	YesNoIndicator <i>Default 'Yes'</i>	YesNoIndicator <i>Default 'true'</i>	ISO20022
Partial voting indicator	YesNoIndicator <i>Default 'Yes'</i>	YesNoIndicator <i>Default 'true'</i>	ISO20022
Indicator: details of the person entitled to participate in the general meeting must be disclosed	YesNoIndicator <i>Default 'Yes'</i>	YesNoIndicator <i>Default 'true'</i>	ISO20022
Indicator: right to put items of the agenda	YesNoIndicator Fixed value according to the Commercial Companies Code	AIPS	(EU) 2018/1212



Issuer deadline for the right to put items of the agenda	Fixed value according to the Commercial Companies Code GM-21	ISODate	(EU) 2018/1212
Indicator: right to submit draft resolutions on agenda items	YesNoIndicator Fixed value according to the Commercial Companies Code	RSPR	(EU) 2018/1212
Issuer deadline for the right to submit draft resolutions on agenda items	Fixed value according to the Commercial Companies Code GM-0 <sup>15</sup> <i>GM date</i>	ISODate	(EU) 2018/1212
Indicator: right to ask questions of the company	YesNoIndicator Fixed value according to the Commercial Companies Code	WQPS	(EU) 2018/1212
Issuer deadline for the right to ask questions of the company	Fixed value according to the Commercial Companies Code GM-0 <sup>14</sup> <i>GM date</i>	ISODate	(EU) 2018/1212
Additional information	Max4000Text	Max350Text	Optional

The content of Tables 2 and 3 represents the full content of the general meeting registration form in the basic mode according to Table 3 in the Annex to Regulation (EU) 2018/1212. In the case of any modifications, companies are required to update the details of a registered general meeting.

To meet the requirements under Regulation (EU) 2018/1212 and the requirements of ISO20022 message structures, KDPW will supplement received information using kdpw\_stream data. The table below presents the information which is not covered by the general meeting registration form but which constitutes general meeting information and will be transmitted along the chain of intermediaries.

Table 4: Information not required from companies in the general meeting registration form – mandatory

Information	Application form format	ISO message format	Requirement
Unique identifier of the general meeting*	COAF, available after GM registration	12 alphanumericals	(EU) 2018/1212
General meeting identifier issued by intermediary	CORP	16 alphanumericals	ISO20022 / SMPG
Type of message**	n/a	NEWM/REPL	(EU) 2018/1212
Event completeness status	n/a	INCO/COMP	ISO20022
Event confirmation status***	n/a	CONF	ISO20022
ISIN code	View	ISIN	(EU) 2018/1212
Name of issuer	View	Max350Text	(EU) 2018/1212
Issuer LEI	n/a	LEI	KDPW - Optional
SRD compliance indicator	n/a	YesNoIndicator <i>Default 'true'</i>	ISO20022 / SMPG
Quorum requirement indicator <sup>16</sup>	YesNoIndicator; Default ' <i>false</i> '	YesNoIndicator	ISO20022
Quorum ( <i>if required</i> )	PercentageRate	PercentageRate	SMPG

\* The unique Corporate Action Event Reference (COAF) to be issued by KDPW as a COAF registration organisation under the requirements of the Securities Market Practice Group (SMPG, [www.smpg.info](http://www.smpg.info)).<sup>17</sup>

\*\* Depending on the operation in the General Meeting application, GM registration, GM update.

\*\*\* GM events registered in the KDPW system will always have the CONF status (confirmed).

<sup>15</sup> GM date. If a general meeting is adjourned, the deadline should be extended accordingly without having to update the GM notification.

<sup>16</sup> The fields populated with the quorum requirement indicator for a general meeting and the quorum level, required in a general meeting notice (seev.001.001.07), will not be included in the general meeting registration form. The default value of the quorum requirement indicator field is 'false' and this information in communicated in the general meeting notice. As the value of the quorum requirement indicator is negative, the quorum level will not be included in the notice.

<sup>17</sup> The KDPW procedures for COAF generation and usage are available as a separate document, which is the COAF market practice.

### 3.2 Listed foreign public company

In the case of listed public foreign companies, the scope of information in a general meeting notification is defined in the SRD Implementing Regulation. According to Article 3b(1)(b) and Article 3b(2) of Directive 2007/36/EC, where the information referred to in Table 3 of the Annex to Regulation (EU) 2018/1212 concerning the convening of a general meeting is available to shareholders on the issuer's website, the general meeting notice to be prepared by the issuer and transmitted by intermediaries is only required to contain blocks A, B and C, including the URL hyperlink to the website where the information can be found. Additional information in blocks D, E and F is optional.

Failure to provide the full scope of information concerning a general meeting does not affect the ability of persons entitled to participate in a general meeting to exercise all their rights, including the transmission of information to the company along the chain of intermediaries. The absence of complete information concerning the corporate action necessary for automated processing increases the cost and operational risk to KDPW and the other intermediaries who transmit instructions from entitled persons to KDPW. Therefore, we recommend that companies provide the full scope of information in general meeting registration.

If a company only provides the mandatory information (blocks A-C), the general meeting will have the event status Incomplete (Event Completeness Status = INCO). If a company provides all information (blocks A-F), the general meeting will have the event status Complete (Event Completeness Status = COMP).

The provisions of the Commercial Companies Code concerning the organisation of general meetings do not apply to listed public foreign companies.

As a target, in the basic mode of the general meeting service, the General Meeting application will enable companies:

- To transmit, along the chain of intermediaries, an incomplete general meeting notification / update including the mandatory URL hyperlink to the website where the complete general meeting notification can be found, published according to the scope and format defined in Table 3 in the Annex to Regulation (EU) 2018/1212;
- Optionally, to transmit, along the chain of intermediaries, a complete general meeting notification / update according to the scope and format defined in Table 3 in the Annex to Regulation (EU) 2018/1212, enabling automated processing, which relieves the company from the obligation to publish the information defined in Table 3 in the Annex to Regulation (EU) 2018/1212 on its website;
- To receive information concerning persons entitled to participate in a general meeting by virtue of uncertificated shares recorded in KDPW according to instructions provided by direct participants to KDPW, presented in the aggregate shareholder list/register made available by KDPW (1);
- To receive information concerning proxies nominated by persons entitled to participate in a general meeting, provided that such proxies are named in the instructions provided to KDPW, presented in the aggregate proxy list/register made available by KDPW (2);
- To receive information concerning votes cast electronically, provided at the request of an entitled person along the chain of intermediaries, provided that such votes are specified in the instructions provided to KDPW, presented in the aggregate vote list made available by KDPW (3);
- To confirm the receipt of votes cast electronically by the company, transmitted via KDPW by intermediaries who transmitted the votes in instructions to KDPW;
- To confirm the recording and counting of votes, provided by the company at the request of shareholders, including the distribution of the confirmation along the chain of intermediaries;
- To provide general meeting voting results by distributing information along the chain of intermediaries.

The table below presents the scope of mandatory data in general meeting registration in the basic mode, provided by the company, indicating whether the requirement is imposed by Implementing Regulation (EU) 2018/1212 or otherwise.

Table 5: Mandatory information required from companies in the general meeting registration form

Information	Application form format	ISO message format	Requirement
Type of general meeting	General/Extraordinary	GMET/XMET	(EU) 2018/1212

Date of the general meeting	ISODateTime	ISODateTime	(EU) 2018/1212
Time of the general meeting	ISODateTime	ISODateTime	(EU) 2018/1212
Date of the general meeting notice	ISODate	ISODate	ISO20022
General meeting record date	ISODate	ISODate	(EU) 2018/1212
Company website	URLAdr	URLAdr	(EU) 2018/1212
General meeting address – Street	Max70Text	Max70Text	(EU) 2018/1212
General meeting address – Building number	Max16Text	Max16Text	(EU) 2018/1212
General meeting address – Post code	Max16Text	Max16Text	(EU) 2018/1212
General meeting address – Town name	Max35Text	Max35Text	(EU) 2018/1212
General meeting address – Country	ISOCountryCode	ISOCountryCode	(EU) 2018/1212

Furthermore, in general meeting registration in the basic mode, companies may provide optional additional information facilitating automated processing along the chain of intermediaries. The table below presents the scope of additional data, provided by companies, indicating whether the requirement is imposed by Implementing Regulation (EU) 2018/1212 or otherwise.

Table 6. Additional information not required from companies in the general meeting registration form

Information	Application form format	ISO message format	Requirement
Method of participation by shareholder <i>Multiple methods may be selected</i>	Physical participation Participation by proxy Electronic voting Voting by mail	PHYS PRXY EVOT MAIL	(EU) 2018/1212
Issuer deadline for voting <i>Provided separately for each selected method of participation</i>	ISODate/ISODateTime/UKWN	ISODate/ISODateTime/UKWN	(EU) 2018/1212
Issuer deadline for the notification of participation	Fixed value, business day before GM-7, 12:00	ISODateTime	(EU) 2018/1212
Issuer deadline for the nomination of proxy	ISODate/ISODateTime/UKWN	ISODate/ISODateTime/UKWN	(EU) 2018/1212
Agenda – Unique identifier of the draft resolution	Max35Text	Max35Text	(EU) 2018/1212
Agenda – Title of the draft resolution	Max500Text	Max350Text	(EU) 2018/1212
Agenda – Description of the draft resolution	n/a	Max1025Text	(EU) 2018/1212
Agenda – Content of the draft resolution	Max10000Text	n/a	KDPW – eVoting
Agenda – URL of the complete draft, additional information, etc.	Max200Text	Max2048Text	(EU) 2018/1212
Type of vote	Binding/Advisory	BNDG/ADVI	(EU) 2018/1212
Indicator: draft resolution published for information only	YesNoIndicator	YesNoIndicator	ISO20022
Status of the draft resolution	Active/Withdrawn <i>Default 'Active'</i>	ACTV/WDRA	ISO20022
Type of vote	CFOR/CAGS/ABST	CFOR/CAGS/ABST	(EU) 2018/1212
Split voting indicator	YesNoIndicator	YesNoIndicator	ISO20022
Partial voting indicator	YesNoIndicator	YesNoIndicator	ISO20022
Indicator: details of the person entitled to participate in the general meeting must be disclosed	YesNoIndicator	YesNoIndicator	ISO20022
Indicator: right to put items of the agenda <i>Optional field</i>	YesNoIndicator	AIPS	(EU) 2018/1212
Issuer deadline for the right to put items of the agenda <i>Optional field</i>	ISODate/ISODateTime/UKWN	ISODate/ISODateTime/UKWN	(EU) 2018/1212

Indicator: right to submit draft resolutions on agenda items	YesNoIndicator <i>Optional field</i>	RSPR	(EU) 2018/1212
Issuer deadline for the right to submit draft resolutions on agenda items	ISODate/ISODateTime/UKWN <i>Optional field</i>	ISODate/ISODateTime/UKWN	(EU) 2018/1212
Indicator: right to ask questions of the company	YesNoIndicator <i>Optional field</i>	WQPS	(EU) 2018/1212
Issuer deadline for the right to ask questions of the company	ISODate/ISODateTime/UKWN <i>Optional field</i>	ISODate/ISODateTime/UKWN	(EU) 2018/1212
Additional information	Max4000Text	Max350Text	Optional

The content of Tables 5 and 6 represents the full content of the general meeting registration form in the basic mode according to Table 3 in the Annex to Regulation (EU) 2018/1212. In the case of any modifications, companies are required to update the details of a registered general meeting.

To meet the requirements under Regulation (EU) 2018/1212 and the requirements of ISO20022 message structures, KDPW will supplement received information using kdpw\_stream data. The table below presents the information which is not covered by the general meeting registration form but which constitutes general meeting information and will be transmitted along the chain of intermediaries.

Table 7: Information not required from companies in the general meeting registration form – mandatory

Information	Application form format	ISO message format	Requirement
Unique identifier of the general meeting*	COAF, available after GM registration	12 alphanumericals	(EU) 2018/1212
General meeting identifier issued by intermediary	CORP	16 alphanumericals	ISO20022 / SMPG
Type of message**	n/a	NEWM/REPL	(EU) 2018/1212
Event completeness status	n/a	INCO/COMP	ISO20022
Event confirmation status	n/a	CONF/UCON	ISO20022
ISIN code(s)	View	ISIN	(EU) 2018/1212
Name of issuer	View	Max350Text	(EU) 2018/1212
Issuer LEI	n/a	LEI	KDPW - Optional
SRD compliance indicator	n/a	YesNoIndicator <i>Default 'true'</i>	ISO20022 / SMPG
Quorum requirement indicator <sup>18</sup>	YesNoIndicator; Default ' <i>false</i> '	YesNoIndicator	ISO20022
Quorum ( <i>if required</i> )	PercentageRate	PercentageRate	SMPG

\* The unique Corporate Action Event Reference (COAF) to be issued by KDPW as a COAF registration organisation under the requirements of the Securities Market Practice Group (SMPG, [www.smpg.info](http://www.smpg.info)).<sup>19</sup>

\*\* Depending on the operation in the General Meeting application, GM registration, GM update.

### 3.3 Unlisted domestic public company / Domestic non-public company

In the case of unlisted domestic public companies and domestic non-public companies, the scope of information in a general meeting notification is defined in the KDPW regulations. Events are registered in the KDPW system only to receive information concerning persons entitled to participate in a general meeting. As a result, the required scope of information is limited.

Companies are required to provide complete mandatory information; consequently, general meeting events always have the status Complete (Event Completeness Status = COMP).

<sup>18</sup> The fields populated with the quorum requirement indicator for a general meeting and indicating the quorum level, required in a general meeting notice (seev.001.001.07), will not be included in the general meeting registration form. The default value of the quorum requirement indicator field is 'false' and this information is communicated in the general meeting notice. As the value of the quorum requirement indicator is negative, the quorum level will not be included in the notice.

<sup>19</sup> The KDPW procedures for COAF generation and usage are available as a separate document, which is the COAF market practice.

As a target, in the basic mode of the general meeting service, the General Meeting application will enable companies:

- To transmit, along the chain of intermediaries, a general meeting notification / update;
- To receive information concerning persons entitled to participate in a general meeting by virtue of uncertificated bearer shares according to instructions provided by direct participants to KDPW, presented in the aggregate shareholder list/register made available by KDPW (1).<sup>20</sup>

The table below presents the scope of mandatory data in general meeting registration in the basic mode, provided by the company.

Table 8: Mandatory information required from companies in the general meeting registration form

Information	Application form format	ISO message format	Requirement
Type of general meeting	General/Extraordinary	GMET/XMET	(EU) 2018/1212
Date of the general meeting	ISODateTime	ISODateTime	(EU) 2018/1212
Time of the general meeting	ISODateTime	ISODateTime	(EU) 2018/1212
Date of the general meeting notice	ISODate	ISODate	ISO20022
General meeting record date	ISODate	ISODate	(EU) 2018/1212
Company website	URLAdr	URLAdr	(EU) 2018/1212
General meeting address – Street	Max70Text	Max70Text	(EU) 2018/1212
General meeting address – Building number	Max16Text	Max16Text	(EU) 2018/1212
General meeting address – Post code	Max16Text	Max16Text	(EU) 2018/1212
General meeting address – Town name	Max35Text	Max35Text	(EU) 2018/1212
General meeting address – Country	ISOCountryCode	ISOCountryCode	(EU) 2018/1212

The content of Table 8 represents the full content of the general meeting registration form in the basic mode. No additional information is provided in general meeting notifications.

To meet the requirements of ISO20022 message structures, KDPW will supplement received information using kdpw\_stream data. The table below presents the information which is not covered by the general meeting registration form but which constitutes general meeting information and will be transmitted along the chain of intermediaries. The SRD compliance indicator is not populated.

Table 9: Information not required from companies in the general meeting registration form – mandatory

Information	Application form format	ISO message format	Requirement
Unique identifier of the general meeting*	COAF, available after GM registration	12 alphanumeric	(EU) 2018/1212
General meeting identifier issued by intermediary	CORP	16 alphanumeric	ISO20022 / SMPG
Type of message**	n/a	NEWM/REPL	(EU) 2018/1212
Event completeness status	n/a	COMP	ISO20022
Event confirmation status***	n/a	CONF	ISO20022
ISIN code(s)	View	ISIN	(EU) 2018/1212
Name of issuer	View	Max350Text	(EU) 2018/1212
Issuer LEI	n/a	LEI	KDPW - Optional
Quorum requirement indicator <sup>21</sup>	YesNoIndicator; Default 'false'	YesNoIndicator	ISO20022
Quorum (if required)	PercentageRate	PercentageRate	SMPG

<sup>20</sup> As of 1 January 2021, applicable to all shares of domestic public companies and domestic non-public companies.

<sup>21</sup> The fields populated with the quorum requirement indicator for a general meeting and indicating the quorum level, required in a general meeting notice (seev.001.001.07), will not be included in the general meeting registration form. The default value of the quorum requirement indicator field is 'false' and this information is communicated in the general meeting notice. As the value of the quorum requirement indicator is negative, the quorum level will not be included in the notice.

\* The unique Corporate Action Event Reference (COAF) to be issued by KDPW as a COAF registration organisation under the requirements of the Securities Market Practice Group (SMPG, [www.smpg.info](http://www.smpg.info)).<sup>22</sup>

\*\* Depending on the operation in the General Meeting application, GM registration, GM update.

\*\*\* GM events registered in the KDPW system will always have the CONF status (confirmed).

### 3.4 Non-EEA listed foreign public company / Unlisted foreign public company

In the case of non-EEA listed foreign public companies and unlisted foreign public companies, the scope of information in a general meeting notification is defined in the KDPW regulations. Events are registered in the KDPW system only to receive information concerning persons entitled to participate in a general meeting. As a result, the required scope of information is limited.

Companies are required to provide complete mandatory information; consequently, general meeting events always have the status Complete (Event Completeness Status = COMP).

As a target, in the basic mode of the general meeting service, the General Meeting application will enable companies:

- To transmit, along the chain of intermediaries, a general meeting notification / update;
- To receive information concerning persons entitled to participate in a general meeting by virtue of uncertificated shares recorded in KDPW according to instructions provided by direct participants to KDPW, presented in the aggregate shareholder list/register made available by KDPW (1).

The table below presents the scope of mandatory data in general meeting registration in the basic mode, provided by the company.

Table 10: Mandatory information required from companies in the general meeting registration form

Information	Application form format	ISO message format	Requirement
Type of general meeting	General/Extraordinary	GMET/XMET	(EU) 2018/1212
Date of the general meeting	ISODateTime	ISODateTime	(EU) 2018/1212
Time of the general meeting	ISODateTime	ISODateTime	(EU) 2018/1212
Date of the general meeting notice	ISODate	ISODate	ISO20022
General meeting record date	ISODate	ISODate	(EU) 2018/1212
Company website	URLAdr	URLAdr	(EU) 2018/1212
General meeting address – Street	Max70Text	Max70Text	(EU) 2018/1212
General meeting address – Building number	Max16Text	Max16Text	(EU) 2018/1212
General meeting address – Post code	Max16Text	Max16Text	(EU) 2018/1212
General meeting address – Town name	Max35Text	Max35Text	(EU) 2018/1212
General meeting address – Country	ISOCountryCode	ISOCountryCode	(EU) 2018/1212

The content of Table 10 represents the full content of the general meeting registration form in the basic mode. No additional information is provided in general meeting notifications.

To meet the requirements of ISO20022 message structures, KDPW will supplement received information using `kdpw_stream` data. The table below presents the information which is not covered by the general meeting registration form but which constitutes general meeting information and will be transmitted along the chain of intermediaries. The SRD compliance indicator is not populated.

Table 11: Information not required from companies in the general meeting registration form – mandatory

Information	Application form format	ISO message format	Requirement
Unique identifier of the general meeting*	COAF, available after GM registration	12 alphanumeric	(EU) 2018/1212
General meeting identifier issued by intermediary	CORP	16 alphanumeric	ISO20022 / SMPG
Type of message**	n/a	NEWM/REPL	(EU) 2018/1212

<sup>22</sup> The KDPW procedures for COAF generation and usage are available as a separate document, which is the COAF market practice.

Event completeness status	n/a	INCO/COMP	ISO20022
Event confirmation status	n/a	CONF/UCON	ISO20022
ISIN code(s)	View	ISIN	(EU) 2018/1212
Name of issuer	View	Max350Text	(EU) 2018/1212
Issuer LEI	n/a	LEI	KDPW - Optional
Quorum requirement indicator <sup>23</sup>	YesNoIndicator; Default 'false'	YesNoIndicator	ISO20022
Quorum (if required)	PercentageRate	PercentageRate	SMPG

\* The unique Corporate Action Event Reference (COAF) to be issued by KDPW as a COAF registration organisation under the requirements of the Securities Market Practice Group (SMPG, [www.smpg.info](http://www.smpg.info)).<sup>24</sup>

\*\* Depending on the operation in the General Meeting application, GM registration, GM update.

### 3.5 Entities managing securities accounts and/or omnibus securities accounts

The ISO20022 message used as a general meeting notification / update is seev.001.001.07 Meeting Notification.

The message seev.001.001.07 is sent to KDPW direct participants when a general meeting is registered (NEWM) or updated (REPL) in kdpw\_stream.

The message seev.001.001.07 is sent to a participant only if the participant holds in its accounts securities with the ISIN code(s) of the security concerned by the general meeting event or kdpw\_stream holds pending documents for the participant concerning the ISIN code(s) of such security. If a participant who holds no such securities buys such securities in the period from the date of the first general meeting notification to the general meeting record date (with a settlement date on or before the general meeting record date), such participant also receives an event notification. If a new ISIN code is issued to shares of a company in the period from the general meeting registration date in KDPW to the general meeting record date, general meeting notifications are also sent to participants holding the new ISIN in their accounts.

If a participant holds more than one ISIN in its accounts for different issues of shares of the company concerned by the registered general meeting, the general meeting notification is sent to such participant separately for each ISIN code.

In special cases, general meeting notification(s) is/are sent after the general meeting record date to those participants who held no such securities in their accounts before that date and receive such securities as a result of transfers of securities accounts from another participant whose participation terminates in the period from the general meeting record date to the date until which participants transmit the details of persons entitled to participate in the general meeting to KDPW.

The content of the general meeting notification message is available as the seev.001.001.07 message schema defined by KDPW.

In its notification to participants, KDPW only provides information transmitted by the company in the general meeting registration. As a result, if a company provides no additional information (Tables 3/6), for instance, draft resolution identifiers, necessary for automated processing of instructions containing proxy nominations or the votes of entitled persons, such information is not included in the general meeting notification. This does not mean that such information cannot be included in the seev.004.001.06 instruction from the participant; however, KDPW runs no content checks of such data and provides them to the company as is, i.e., as received in the participant's instruction.

## 4. GENERAL MEETING CANCELLATION

### 4.1 Company

General meetings may only be cancelled in the General Meeting application.

<sup>23</sup> The fields populated with the quorum requirement indicator for a general meeting and indicating the quorum level, required in a general meeting notice (seev.001.001.07), will not be included in the general meeting registration form. The default value of the quorum requirement indicator field is 'false' and this information is communicated in the general meeting notice. As the value of the quorum requirement indicator is negative, the quorum level will not be included in the notice.

<sup>24</sup> The KDPW procedures for COAF generation and usage are available as a separate document, which is the COAF market practice.

Issuers may at any time enter a general meeting cancellation in the General Meeting application up to and including the general meeting date. After the general meeting date, the general meeting cancellation option is inactive.

Modification of key data concerning a registered general meeting may cause the automatic cancellation of the registered general meeting and the registration of a new general meeting in the General Meeting application. Key data concerning a general meeting may be modified by no later than GM-16 / general meeting record date at 18:00.

If an issuer sends a general meeting cancellation after KDPW (1) provides the company with an aggregate list of persons entitled to participate in the general meeting or a notification that no such list can be provided; or (2) provides the company with an aggregate list of nominated proxies; or (3) provides a list of votes, regular fee(s) for such operations will be charged.

#### 4.2 Entity managing securities accounts and/or omnibus securities accounts

The ISO20022 message used to cancel a general meeting is seev.002.001.06 Meeting Cancellation Advice.

The seev.002.001.06 message is sent to KDPW direct participants if an event is cancelled by an issuer (WITH) or if an event is cancelled due to a process error (PROC). The message is sent to those participants who have received the general meeting notification (seev.001.001.07) and the general meeting entitlement notification (seev.003.001.06) where the cancellation is being processed after the general meeting record date. The transmission of the message ends the processing of a general meeting event. The message is sent in the same way as a general meeting notice, per ISIN code, provided that the participant has received a notice for such ISIN code.

Event cancellation results in the cancellation of the participant's prior seev.004.001.06 Meeting Instruction. In that case, in addition to a general meeting cancellation, the participant receives messages cancelling provided instructions which have been approved. The instruction cancellation message is seev.006.001.06 Meeting Instruction Status containing the instruction cancellation indicator CAND.

The content of the general meeting cancellation message is available as the seev.002.001.06 message schema defined by KDPW.

## 5. GENERAL MEETING ENTITLEMENT NOTIFICATION

### 5.1 Company

Not applicable.

### 5.2 Entity managing securities accounts and/or omnibus securities accounts

The ISO20022 message used to communicate the entitlements to participate in a general meeting (balances in accounts of KDPW participants) is seev.003.001.06 Meeting Entitlement Notification.

The message seev.003.001.06 is sent at the end of day on the general meeting record date (Entitlement Fixing Date) or, if applicable, on the first business day after that date if the record date is a bank holiday.

In the case of listed and unlisted domestic public companies, the entitlement notification only concerns uncertificated bearer shares recorded in KDPW. Other shares of companies recorded in KDPW are not covered by the entitlement notification system.<sup>25</sup> In the case of listed foreign public companies, both under the SRD regime and non-EEA, and unlisted foreign public companies, the entitlement notification concerns shares recorded in KDPW.

An entitlement notification is provided per ISIN and per entity account. A separate seev.003.001.06 message is sent for all ISIN codes concerned by an event and all entity accounts with a balance of more than 0 securities.

Entitlement details provided in the message seev.003.001.06 may be modified as a result of transfers of securities accounts to another participant due to termination of the participation of a KDPW participant in the period from the general meeting record date to the date until which participants transmit the details of persons entitled to participate in the general meeting to KDPW. In that case, the participant receives seev.003.001.06 message(s) with the REPL function for an ISIN code if the participant has received an entitlement notification for such ISIN code or with the NEWM function for a new ISIN code.

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<sup>25</sup> As of 1 January 2021, applicable to all shares of domestic public companies. The same will apply to domestic non-public companies whose shares are recorded in the CSD.



The content of the general meeting entitlement notification message is available as the seev.003.001.06 message schema defined by KDPW.

## 6. GENERAL MEETING INSTRUCTION

For all categories of companies, the general meeting instruction is used to provide details of persons entitled to participate in a general meeting who have requested an entity managing a securities account to issue a personal certificate of entitlement to participate in a general meeting or its equivalent.

In addition, for listed domestic and foreign public companies, it is possible (1) to provide the company with information of a nominated proxy who is to physically represent the entitled person during the general meeting, including the details of such proxy; or (2) to provide the company with votes in relation to draft resolutions included in the general meeting notification.

The aforementioned additional functionalities are mutually exclusive, i.e., an entitled person may either nominate a proxy or submit votes.

General meeting participation functionalities may be executed separately within different time limits.

Information received from entities managing securities accounts and/or omnibus securities accounts is provided to companies in the General Meeting application.

### 6.1 Entity managing securities accounts and/or omnibus securities accounts

The ISO20022 message used to transmit general meeting instructions is seev.004.001.06 Meeting Instruction.

The seev.004.001.06 instruction message may concern only one ISIN code. To provide instructions for multiple ISIN codes, multiple instruction messages must be sent, one message per ISIN code.

The structure of a single seev.004.001.06 message accommodates multiple individual instructions provided that all instructions concern the same ISIN code. The repeating section in the general meeting instruction is populated separately for each entitled person. Each individual instruction is marked with a unique Single Instruction Identification <SnglInstrId>, issued by a KDPW participant. The individual instruction identification is not the same as the message identifier in the message header.

The content of the general meeting instruction message is available as the seev.004.001.06 message schema defined by KDPW.

#### 6.1.1 Providing information concerning persons entitled to participate in a general meeting

For listed and unlisted domestic public companies and domestic non-public companies, information concerning persons entitled to participate in a general meeting who have requested an entity managing a securities account to issue a personal certificate of entitlement to participate in a general meeting or its equivalent is provided to KDPW on the same terms and conditions as those currently applicable. Participants send instructions to KDPW no later than GM-12 and corrections, if any, no later than 12:00 of the business day preceding GM-7.

Listed foreign public companies, both under the SRD regime and non-EEA, and unlisted foreign public companies are subject to the same terms and conditions as domestic companies. The time limits set by KDPW apply to the provision of information concerning persons entitled to participate in a general meeting to KDPW. Participants send instructions to KDPW no later than GM-12 and corrections, if any, no later than 12:00 of the business day preceding GM-7.

Instructions listing persons entitled to participate in a general meeting may indicate entitlements with voting rights and entitlements without voting rights. The number of securities indicated in instructions is checked against account balances in KDPW only for entitlements with voting rights.

The table below presents the method of populating the message according to the ISO schema and under KDPW requirements.

Table 12: Populating seev.004.001.06 messages

seev.004.001.06 field	Information	Comments
GENERAL		
<Mtgid>	General meeting identification issued by KDPW	

<IssrMtgId>	COAF issued by KDPW	
<MtgDtAndTm>	General meeting date and time	
<Tp>	Type of general meeting	
<FinInstrmId>	ISIN	
INSTRUCTION		Repeating section for each instruction
<SnglInstrId>	Unique instruction identification and optional additional data	<p>Information provided in the indicated order, separated by special sign //</p> <ol style="list-style-type: none"> <li>1. Unique instruction identification – <b>Max7Int.</b> Mandatory field.</li> <li>2. Personal certificate identifier – <b>Max20Text</b> Populated if information is available. <b>Note !!!</b> Identifier must not contain / (slash).</li> <li>3. Entitled person type – <b>Code</b> Optional field, if no entitled person type is provided, the default value is BENY.   BENY – Shareholder, voting right  BENN – Shareholder, no voting right  COMY – Joint property of spouses, voting right  COMN – Joint property of spouses, no voting right  COWY – Other joint property, voting right  COWN – Other joint property, no voting right  PLDG – Pledgee  HLDR – User</li> </ol> <p><i>Example 1: Personal certificate identifier.</i>  &lt;SnglInstrId&gt;<b>1234567</b>//<b>XXX012345</b>//<b>BENY</b>&lt;/SnglInstrId&gt;</p> <p><i>Example 2: No personal certificate identifier.</i>  &lt;SnglInstrId&gt;<b>1234567</b>////<b>PLDG</b>&lt;/SnglInstrId&gt;</p> <p><i>Example 3: No personal certificate identifier, no entitled person type.</i> &lt;SnglInstrId&gt;<b>1234567</b>&lt;/SnglInstrId&gt;</p>
<VoteExctnConf>	Vote execution confirmation	Required in the ISO message schema
<AcctId>	KDPW entity account identifier	
<LglPrsn><NmAndAdr><Nm>	KDPW participant name	Required in the ISO message schema
<Id><PrtryId><Id>	KDPW participant code	
<Id><PrtryId><Issr>	KDPW participant code issuer	Default: KDPW
<InstdBal><Bal><Unit>	Quantity of shares conferring the right to participate in the general meeting	
<SfkpgPlc><TpAndId><SfkpgPlcTp>	Safekeeping place of securities	NCSD
<SfkpgPlc><TpAndId><Id>	BIC	KDPWPLPW
RIGHTS HOLDER <RghtsHldr>		
LEGAL PERSON <LglPrsn>		
<NmAndAdr><Nm>	Name	
<Adr><StrtNm>	Address – Street	
<Adr><BldgNb>	Address – Building number	
<Adr><PstCd>	Address – Post code	
<Adr><TwnNm>	Address – Town name	
<Adr><Ctry>	Address – Country	Country code, ISO 3166, Alpha-2 Code, e.g. PL.
<EmailAdr>	Email address	Provided for eVoting. Not disclosed to the company.
<Id><ClntId>	Unique identifier of the rights holder	<NtlRegnNb> - KRS, or

		<LEI> - LEI, or <AnyBIC> - BIC, or <ClntID> - Client identifier.
NATURAL PERSON <NtrlPrsn>		For joint ownership – repeating section
<NmAndAdr><FrstNm>	First name	
<NmAndAdr><SrnM>	Surname	
<Adr><StrtNm>	Address – Street	Mandatory field. For joint ownership, address details must be provided for at least one joint owner.
<Adr><BldgNb>	Address – Building number	
<Adr><PstCd>	Address – Post code	
<Adr><TwnNm>	Address – Town name	
<Adr><Ctry>	Address – Country	Country code, ISO 3166, Alpha-2 Code, e.g. PL.
<EmailAdr>	Email address	Provided for eVoting. Not disclosed to the company.
<Id><Id>	Unique identifier of the rights holder	
<Id><IdTp>	Type of unique identifier of the rights holder.	National identifier within the meaning of Article 6 of Commission Delegated Regulation (EU) 2017/590. NRIN – PESEL IDCD – Identity card number CCPT – Passport number TXID – NIP DRLC – Driving licence number SOCS – Social security number ARNU – Non-resident identifier CUST – Concat
GM PARTICIPATION METHOD <SpfcInstrReq>		
<PrtpctnMtd><Cd>	Method of participation in the general meeting	PHYS – Personal participation PRXY – Participation by proxy EVOT – Electronic voting MAIL – Voting by mail

If the company allows participation in the general meeting by means of electronic communication (EVOT) and opts for extended service when registering the general meeting in KDPW, i.e., allows for participation in the general meeting by means of the eVoting application provided by KDPW and provides the address <https://mojeglosowanie.pl> in the field <ElctrcVote><URLAdr>, then in order to allow eligible persons to participate in the general meeting by such means, the participant is required to provide the email address of the eligible person when sending the eligible person's general meeting registration message. The type of rights holder, which is additionally required when using eVoting, is provided by completing the relevant rights holder information section <RghtsHldr>, as follows: <NtrlPrsn> for a natural person or <LglPrsn> for a legal person.

In that case, it is not possible to provide proxy information and participation method information. Such instructions will be rejected by KDPW.

Furthermore, the email address of the eligible person to participate in the general meeting by means of the eVoting application may only be provided for eligible persons with voting rights, i.e., entitled person type BENY, COMY, COWY, PLDG, HLDR. Otherwise, the instruction will be rejected.

### 6.1.2 Information concerning nominated proxy to participate in a general meeting

In addition to the details of a person entitled to participate in a general meeting, the instruction message seev.004.001.06 may also indicate the appointment of a proxy and the details of the proxy (section 6.1.2) or, alternatively, instructions concerning the entitled person's votes (section 6.1.3).

Instructions concerning a person entitled to participate in a general meeting cannot both nominate a proxy and submit votes of the entitled person; otherwise, it is rejected by KDPW.

By default, a nominated proxy is expected to participate in person in a physical general meeting. A proxy nomination may be provided no later than the issuer's deadline to nominate a proxy for a general meeting (ISODateTime) and no later than GM-2, 12:00, provided that GM-2 is a business day. The deadline cannot be on or after the KDPW deadline for provision of information concerning persons entitled to participate in a general meeting. If the issuer sets no such deadline (UKWN), information concerning the nominated proxy may be sent in message seev.004.001.06 sent to KDPW no later than 12:00 on GM-2 or, if applicable, on the last business day before that date if GM-2 is a bank holiday.

If the issuer's deadline to nominate a proxy for a general meeting is later than the deadline for participants to send information concerning persons entitled to participate in a general meeting to KDPW, a proxy may be nominated after that deadline provided that:

- (1) The information concerning a person entitled to participate in a general meeting is first provided within the deadline (section 6.1.1);
- (2) The original seev.004.001.06 message is cancelled (section 7.1);
- (3) The cancelled instruction is effectively replaced by a new instruction.

The replacing instruction may only supplement the content of the original instruction; it is deemed correct provided that its details match the details in the original instruction provided to the company with a list of persons entitled to participate in a general meeting. Otherwise, the replacing instruction is rejected and the original instruction is not effectively cancelled and remains binding.

Further to the foregoing, details provided to a company in a list of persons entitled to participate in a general meeting to the extent defined by law and KDPW regulations are not subject to change.

An instruction nominating a proxy may be cancelled and replaced by a new instruction nominating a different proxy or submitting votes on the same terms.

In every case where the general meeting participation method is modified for an eligible person, the new participation method <PrtcptnMtd> must be provided in the replacement instruction.

The table below presents data additional to the mandatory content of seev.004.001.06 to the extent of nominating a proxy. The scope and type of data should be consistent with the requirements of the company.

Table 13: Populating information concerning proxy nomination in seev.004.001.06

seev.004.001.06 field	Information	Comments
PROXY <Prxy>		
<PrxyTp>	Type of proxy	DISC – Discretionary
LEGAL PERSON <LglPrsn>		
<NmAndAdr><Nm>	Name	
<Adr><StrtNm>	Address – Street	
<Adr><BldgNb>	Address – Building number	
<Adr><PstCd>	Address – Post code	
<Adr><TwnNm>	Address – Town name	
<Adr><Ctry>	Address – Country	Country code, ISO 3166, Alpha-2 Code, e.g. PL.
<Id>	Proxy identifier	<NtlRegnNb> - KRS, <i>or</i> <LEI> - LEI, <i>or</i> <AnyBIC> - BIC, <i>or</i> <ClntID> - Client identifier.
NATURAL PERSON <NtrlPrsn>		
<NmAndAdr><FrstNm>	First name	
<NmAndAdr><Srnm>	Surname	
<Adr><StrtNm>	Address – Street	
<Adr><BldgNb>	Address – Building number	
<Adr><PstCd>	Address – Post code	
<Adr><TwnNm>	Address – Town name	

<Adr><Ctry>	Address – Country	Country code, ISO 3166, Alpha-2 Code, e.g. PL.
<Id><Id>	Proxy identifier	
<Id><IdTp>	Type of identifier	National identifier within the meaning of Article 6 of Commission Delegated Regulation (EU) 2017/590. NRIN – PESEL IDCD – Identity card number CCPT – Passport number TXID – NIP DRLC – Driving licence number SOCS – Social security number ARNU – Non-resident identifier CUST – Concat
GM ATTENDANCE CARD <AttndncCardDtls>		
<DlvryMtd>	Delivery method of the GM attendance card	ENTR – On entry

### 6.1.3 Submitting votes

In addition to the details of a person entitled to participate in a general meeting, the instruction message seev.004.001.06 may also indicate the appointment of a proxy and the details of the proxy (section 6.1.2) or, alternatively, instructions concerning the entitled person's votes (section 6.1.3).

Instructions concerning a person entitled to participate in a general meeting cannot both nominate a proxy and submit votes of the entitled person; otherwise, it is rejected by KDPW.

Instructions submitting votes of an entitled person may be given provided that the company's general meeting notification allows for electronic voting (EVOT) and provided that the entitled person named in the instruction holds a voting right.

Instructions submitting votes of an entitled person may be provided no later than the issuer's deadline for electronic voting (ISODateTime) and no later than GM-2, 12:00, provided that GM-2 is a business day. The deadline cannot be on or after the KDPW deadline for provision of information concerning persons entitled to participate in a general meeting. If the issuer sets no such deadline (UKWN), instructions submitting votes of an entitled person may be provided in message seev.004.001.06 sent to KDPW no later than 12:00 on GM-2 or, if applicable, on the last business day before that date if GM-2 is a bank holiday.

If the issuer's deadline for voting is later than the deadline for participants to send information concerning persons entitled to participate in a general meeting to KDPW, votes may be submitted after that deadline provided that:

- (1) The information concerning a person entitled to participate in a general meeting is first provided within the deadline (section 6.1.1);
- (2) The original seev.004.001.06 message is cancelled (section 7.1);
- (3) The cancelled instruction is effectively replaced by a new instruction.

The replacing instruction may only supplement the content of the original instruction; it is deemed correct provided that its details match the details in the original instruction provided to the company with a list of persons entitled to participate in a general meeting. Otherwise, the replacing instruction is rejected and the original instruction is not effectively cancelled and remains binding.

Further to the foregoing, details provided to a company in a list of persons entitled to participate in a general meeting to the extent defined by law and KDPW regulations are not subject to change.

An instruction submitting votes may be cancelled and replaced by a new instruction submitting votes or nominating a proxy on the same terms.

In every case where the general meeting participation method is modified for an eligible person, the new participation method <PrtcptnMtd> must be provided in the replacement instruction.

The table below presents data additional to the mandatory content of seev.004.001.06 to the extent of submitting votes. The scope and type of data should be consistent with the requirements of the company.

Table 14: Populating information concerning submission of votes in seev.004.001.06

seev.004.001.06 field	Information	Comments
INSTRUCTION <VoteDtls><VoteInstrForAgndRsltn>		
<VotePerAgndRsltn>	Instruction to vote per draft resolution	
<VoteInstr><IssrLabl>	Unique identifier of draft resolution	Repeating section per draft resolution
<For><Qty><Unit> and/or	Number of votes For	
<For><Cd>	Number of votes For (Code)	QALL – All shares
<Agnst><Qty><Unit> and/or	Number of votes Against	
<Agnst><Cd>	Number of votes Against (Code)	QALL – All shares
<Abstn><Qty><Unit> and/or	Number of votes Abstaining	
<Abstn><Cd>	Number of votes Abstaining (Code)	QALL – All shares

Optionally, additional information may be provided for draft resolutions which are not previously published and only put to a vote during a general meeting. The table below presents the relevant instruction.

Table 15: Populating information concerning submission of votes in seev.004.001.06

seev.004.001.06 field	Information	Comments
INSTRUCTION <VoteDtls><VoteInstrForMtgRsltn>		
<VoteIndctn>	Instruction to vote per draft resolution	
<Tp>	Type of vote	CFOR – For CAGS – Against ABST – Abstaining

## 6.2 Company

Based on information received from participants, KDPW provides the following information to companies:

- (1) Aggregate list of persons entitled to participate in a general meeting (section 6.2.1);
- (2) Proxies nominated by entitled persons on the list referred to in (1) (section 6.2.2);
- (3) Votes submitted by entitled persons on the list referred to in (1) (section 6.2.3).

Such information is provided to companies in the General Meeting application within the time limits defined in laws and KDPW regulations and, if applicable (2, 3), within time limits set by the company.

### 6.2.1 Receiving information concerning persons entitled to participate in a general meeting

On the business day preceding GM-7, at 14:00, KDPW provides issuers with aggregate lists of persons entitled to participate in a general meeting.

The list is available at the level of the general meeting selected in the General Meeting application. The list is available under emergency procedures on the same terms as those currently applicable.

Information provided in the list is not subject to change. The foregoing does not apply to the general meeting participation method <PrtcptnMtd> which may change, for a given entitled person who has provided additional instructions, after the list is made available to the company.

The currently applicable list structure will be extended to include the entitled person type indicator (shareholder, joint holder, pledgee, user), voting rights/no voting rights, the general meeting participation method, the entitled person identifier, and whether the entitled person expects the company to provide the vote recording and counting confirmation.

Lists are available in XLSX and/or XML format. Lists may be downloaded multiple times. Each download is recorded in the operations log of the relevant general meeting, including the date and time and the user.

Lists of entitled persons are available to companies within 3 months and 15 days after the general meeting.

### 6.2.2 Receiving information concerning nominated proxies

At the issuer's deadline for the nomination of proxies to participate in a general meeting, at 14:00, KDPW provides issuers with aggregate lists of nominated proxies.

The list is available at the level of the general meeting selected in the General Meeting application.

Information concerning nominated proxies may only concern entitled persons on the aggregate list (section 6.2.1). Information provided in the list is not subject to change. The foregoing does not apply to the general meeting participation method <PrtcptnMtd> which may change, for a given entitled person who has provided additional instructions, after the list is made available to the company.

The list structure is the same as the list of entitled persons. A proxy list is segregated per ISIN and per KDPW participant who provides relevant information. An aggregate proxy list and an aggregate list of persons entitled to participate in a general meeting share a common identifier of the rights holder issued by KDPW and the identifier of the certificate of entitlement to participate in the general meeting.

Lists are available in XLSX and/or XML format. Lists may be downloaded multiple times. Each download is recorded in the operations log of the relevant general meeting, including the date and time and the user.

Lists of nominated proxies are available to companies within 3 months and 15 days after the general meeting.

### 6.2.3 Receiving vote submissions

At the issuer's deadline for votes cast electronically, at 14:00, KDPW provides issuers with aggregate lists of votes submitted by persons entitled to participate in and vote at a general meeting.

The list is available at the level of the general meeting selected in the General Meeting application.

Information concerning submitted votes may only concern entitled persons on the aggregate list (section 6.2.1). Information provided in the list is not subject to change. The foregoing does not apply to the general meeting participation method <PrtcptnMtd> which may change, for a given entitled person who has provided additional instructions, after the list is made available to the company.

The list structure is the same as the list of entitled persons. Vote submissions are segregated per ISIN and per KDPW participant who provides relevant information. An aggregate vote submission and an aggregate list of persons entitled to participate in a general meeting share a common identifier of the rights holder issued by KDPW and the identifier of the certificate of entitlement to participate in the general meeting.

Lists are available in XLSX and/or XML format. Lists may be downloaded multiple times. Each download is recorded in the operations log of the relevant general meeting, including the date and time and the user.

Lists of votes are available to companies within 3 months and 15 days after the general meeting.

## 7. GENERAL MEETING INSTRUCTION CANCELLATION

### 7.1 Entity managing securities accounts and/or omnibus securities accounts

The ISO20022 message used to cancel a general meeting instruction is seev.005.001.06 Meeting Instruction Cancellation Request.

Cancellations are executed individually for each instruction marked with a unique Single Instruction Identification <SnglInstrId>, issued by a KDPW participant.

The structure of a single seev.005.001.06 message accommodates multiple individual general meeting participation instruction cancellations. The Single Instruction Identification <SnglInstrId> must be provided for each such instruction to be cancelled.

Instructions may be cancelled unconditionally before the deadline for participants to send information concerning persons entitled to participate in a general meeting to KDPW.

Instructions may be cancelled after the deadline for participants to send information concerning persons entitled to participate in a general meeting to KDPW only if the instruction to be cancelled is effectively replaced by a new instruction.

In that case, the replacing instruction may only supplement the content of the original instruction; it is deemed correct provided that its details match the details in the original instruction provided to the company with a list of persons entitled to participate in a general meeting. The foregoing does not apply to the general meeting participation method <PrtcptnMtd> which may change, for a given entitled person who has provided additional instructions, after the list is made available to the company. In addition, the supplementing instruction must be

provided within the issuer’s deadline for information concerning proxy nominations or vote submissions. Otherwise, the replacing instruction is rejected and the original instruction is not effectively cancelled and remains binding.

The content of the general meeting instruction cancellation message is available as the seev.005.001.06 message schema defined by KDPW.

## 7.2 Company

Specific information is provided to companies within specific time limits and is not subject to change thereafter. Consequently, sending and/or cancelling general meeting instructions and sending replacing instructions, if applicable, remains neutral to the company.

## 8. GENERAL MEETING INSTRUCTION / CANCELLATION STATUS

### 8.1 Entity managing securities accounts and/or omnibus securities accounts

The ISO20022 message used to communicate the status of a general meeting instruction or cancellation is seev.006.001.06 Meeting Instruction Status.

An instruction or cancellation status is provided individually for each instruction marked with a unique Single Instruction Identification <SnglInstrId>, issued by a KDPW participant.

The structure of a single seev.006.001.06 message accommodates multiple individual instruction or cancellation statuses.

The content of the general meeting instruction or cancellation status message is available as the seev.006.001.06 message schema defined by KDPW.

The instruction status message seev.006.001.06 contains an Instruction Type Status <InstrTpSts> section with a populated Instruction Status <InstrSts> block.

The cancellation status message seev.006.001.06 contains an Instruction Type Status <InstrTpSts> section with a populated Cancellation Status <CxlSts > block.

If KDPW provides a reason code <RsnCd> other than ISO codes, i.e., a proprietary reason code <Prtry> issued by KDPW, the possible error identifiers <Id> and additional reason information <AddtlRsnInf> will be defined in the document *Status and error codes in kdpw\_stream XML corporate action messages under ISO 20022*.

### 8.2 Company

Specific information is provided to companies within specific time limits and is not subject to change thereafter. Consequently, sending and/or cancelling general meeting instructions and sending replacing instructions, if applicable, remains neutral to the company. Likewise, status messages are neutral to the company.

## 9. VOTE RECORDING AND COUNTING CONFIRMATION

### 9.1 Company

Starting on day GM+1, KDPW’s General Meeting application allows domestic and foreign listed public companies to distribute vote recording and counting confirmations to entitled persons holding voting rights put on the aggregate list of persons entitled to participate in a general meeting.

Vote recording and counting confirmations for each entitled person may be disseminated in the General Meeting application.

Given that confirmations are only provided at the request of a shareholder and in view of the required format of confirmations under Regulation (EU) 2018/1212, confirmations are provided per person entitled to participate in a general meeting. Aggregate confirmations are not distributed. Companies are required to indicate how they received the votes concerned by a confirmation.

Table 16: Additional information: vote recording and counting confirmation

Information	Application form format	ISO message format	Requirement
How the company received votes	Physically at the GM By mail	PVAM PVBM	(EU) 2018/1212



	Electronically at the GM Electronically before the GM	EVAM EVBM	
Date of receipt	PVAM / PVBM – GM date EVAM /EVBM – Date of first download of a vote submission list	ISODate	(EU) 2018/1212

To meet the requirements under Regulation (EU) 2018/1212 and ISO20022 message structures, KDPW will supplement received information using data from the General Meeting application and kdpw\_stream, if available.

## 9.2 Entity managing securities accounts and/or omnibus securities accounts

The ISO20022 message used to provide vote recording and counting confirmations is seev.007.001.06 Meeting Vote Execution Confirmation.

seev.007.001.06 messages are provided per ISIN, individually for each entitled person with a reference to an individual general meeting instruction marked with a unique Single Instruction Identification <SnglInstrId>.

Messages are only sent to those participants who have previously provided KDPW with information concerning persons entitled to participate in a general meeting who are named in the confirmation, used by KDPW to prepare an aggregate list of entitled persons provided to the company.

The content of the vote recording and counting confirmation message is available as the seev.007.001.06 message schema defined by KDPW.

## 10. GENERAL MEETING RESULTS DISSEMINATION

Dissemination of general meeting results along the chain of intermediaries is not required under the Commercial Companies Code or SRD; as such, it is optional in the general meeting service. Consequently, KDPW may implement this functionality later than the functionalities required by law.

### 10.1 Company

If a general meeting registration includes optional additional information (Table 3 / Table 6), including designation of draft resolutions of the general meeting, starting on day GM+1, KDPW's General Meeting application allows domestic and foreign listed public companies to disseminate general meeting results, including information concerning accepted and rejected resolutions and the number and type of votes cast.

Such information is provided for each of the resolutions indicated in the general meeting registration to the extent of information specified in Tables 3 and 6.

If a correction is required, general meeting results may be updated until such time that the general meeting file is closed in the KDPW system. KDPW closes general meeting files 3 months and 15 days after the general meeting date.

The table below presents the scope of required information in general meeting results dissemination.

Table 17: General meeting results dissemination information

Information	Application form format	ISO message format	Requirement
Unique identifier of draft resolution	Max35Text	Max35Text	n/a
Resolution status	Accepted Rejected Withdrawn	ACPT REJT WDRA	n/a
Number of votes For	Number	ISODecimalNumber	n/a
Number of votes Against	Number	ISODecimalNumber	n/a
Number of votes Abstaining	Number	ISODecimalNumber	n/a
Additional information – URL address	Max2048Text	Max2048Text	n/a

General meeting results or updates are distributed only to those KDPW direct participants who have previously provided KDPW with information concerning persons entitled to participate in a general meeting, used by KDPW to prepare an aggregate list of entitled persons provided to the company. To meet the requirements of Regulation

(EU) 2018/1212 and ISO20022 message structures, KDPW will supplement such information using data from kdpw\_stream, if available.

## 10.2 Entity managing securities accounts and /or omnibus securities accounts

The ISO20022 message used to disseminate general meeting results or updates is seev.008.001.06 Meeting Results Dissemination.

The message is distributed to participants only for general meetings registered in the KDPW system provided that the company has checked general meeting results (NEWM) or general meeting results updates (REPL) in the General Meeting application.

Messages are distributed only to those participants who have previously provided KDPW with information concerning persons entitled to participate in a general meeting, used by KDPW to prepare an aggregate list of entitled persons provided to the company.

The message is sent separately for each ISIN code involved in the general meeting event. If the participant has sent instructions for multiple ISIN codes, the participant will receive seev.008.001.06 messages in the same number.

The content of the general meeting results or update message is available as the seev.008.001.06 message schema defined by KDPW.