

DOCUMENT VERSIONS

<u>Version</u>	<u>Pages modified / Observations</u>
03/09/2020	First version of the document
21/01/2020	Second version of the document: Fields 9,10 and 20 are amended. Furthermore, field 30 is modified to optional in line with Seev.047 message.
22/11/2021	Third version of the document: Description and content of field 30 (Date of birth) is updated to allow reporting the legal person year of incorporation. Furthermore, information for participants and description of field 6 (Related request reference) are amended to allow reporting the previous communication reference if the function of the message is a replacement (REPL). Finally, the content of field T2CERROIB is modified to report the SRD2 indicator when it is a request based on the Shareholder Rights Directive.
10/03/2025	Reform Project 3. Changes to be implemented with the entry into force of the Reform 3 project are incorporated.

Section	Title
Ownership notification	Reporting ownership upon request

HTITU12 FORMAT

General description

This format will be used:

For IBERCLEAR to notify participants that they must send an HTITU12 on the reference date for the specified ISIN. All participants with a position or pending transactions will be notified in case the *record date* has not been reached and only participants with a position at the end of *record date* if the request is made after this date.

For the participants to notify IBERCLEAR of the ownership of the security subject to the request. IBERCLEAR will reply to the participants.

For IBERCLEAR to notify the ownership indicated by the participants.

Origin and destination

Issuer: Participants

Recipient: IBERCLEAR

Issuer: IBERCLEAR

Recipient: Participants

Issuer: IBERCLEAR

Recipient: Issuers

Overview

Each register comprises various types of information.

Economic data.

01-25: Tax data, one for each natural-legal person linked to those securities.

Maximum 25 holders.

In accordance with Technical Appendix T3 "Identification of the owner of the transaction".

In case of HTITU12 NEWM, 0 fiscal data are entered.

DM: Registered office details.

In accordance with Technical Appendix T3 "Identification of the owner of the transaction".

In case of HTITU12 NEWM, 0 address data are entered.

This format supports several functionalities that are found in field 7 "message function". All of them are described below.

Information for participants

Request for identification of shareholders. When it is an information request HTITU12, IBERCLEAR will send an HTITU12 NEWM function that will only have the following fields reported:

T2CFORMAT
T2CERROIB (in the event the request is at the order of the CNMV)
T2FECOMU
T2REFERCO
T2REFSERV
T2CFUNMM (NEWM)
T2UREENV
T2VUMBRL (optional)
T2CCALCF (optional)
T2CVALOR
T2FEVALO
T2FDEADL
T2NREGIST, which will have value 0
T2NREGISD, which will have value 0

Request for identification of shareholders and beneficial owners. When it is an information request HTITU12, IBERCLEAR will send an HTITU12 NEWM function that will have the same fields informed in a Request for identification of shareholders, but the field 8 will inform the "S" indicator.

Modification of request for identification of shareholders. The same fields will be entered when the issuer decides to modify the T2FDEADL field. In this case, IBERCLEAR will send a HITITU12 REPL

function modifying the field "Date-time of response to the issuer" (may only be extended), reporting the field T2REFRELA to include the communication reference of the previous message that has been modified.

If the issuer decides to modify a different field, they will not be able to modify their request, so they must cancel it.

Cancellation of a request to identify shareholders. If the issuer wishes to cancel the information related to their request for ownership, IBERCLEAR will send an HTITU12 CANC function, reporting the following fields:

T2CFORMAT
T2CERROIB (in the event the request is at the order of the CNMV)
T2FECOMU
T2REFERCO
T2REFSERV
T2REFRELA
T2CFUNMM (CANC)
T2CVALOR
T2FEVALO

Participant answer. The participant must fill in at least the required fields when sending an HTITU12 with ANSW function in response to an ownership identification request. IBERCLEAR will receive the corresponding HTITU12 and will process the corresponding information.

Status of participant answer. When a participant sends an HTITU12 answer to an ownership answer sent with or without errors, IBERCLEAR will send a HTITU12 ANSW function of the corresponding error if necessary (if correct, the error field will not be reported).

Request to cancel an answer from a participant. If the participant wishes to cancel or modify the information related to ownership already reported in its answer, it must send an HTITU12 file with the CANS function, reporting the following fields:

T2CFORMAT
T2FECOMU
T2REFERCO
T2REFSERV
T2CFUNMM (CANS)
T2COBICP
T2CVALOR
T2FEVALO

Subsequently, IBERCLEAR will reply to this cancellation request with the CANS function file without errors.

Specific request for identification of beneficial owners. When it is a specific request for identification of beneficial owners, IBERCLEAR will send an HTITU12 NEWM function will have the same fields informed in a Request for identification of shareholders but reporting the account number and the CCV or equivalent code reference the request is addressing:

T2CFORMAT
T2CERROIB (in the event the request is at the order of the CNMV)
T2FECOMU
T2REFERCO
T2REFSERV
T2CFUNMM (NEWM)
T2UREENV
T2VUMBRL (optional)
T2CCALCF (optional)
T2CVALOR
T2CUENTV
T2FEVALO
T2FDEADL
T2RCLIENT
T2NREGIST, which will have value 0
T2NREGISD, which will have value 0

Information for issuers

The issuer or a third party (majority shareholder or group of shareholders) will request the identity of its shareholders through the online application called BME-PC. The request will not be sent to participants without Iberclear confirming the request.

Once the request is confirmed, Iberclear will send the corresponding communications on the HTITU12 format to the participants that have a position or have transactions pending settlement in the request value code (only if the participants do not wish to receive the request through the corresponding ISO20002 format).

Once the information received by the participants has been grouped and reconciled, the information will be sent to the issuer in accordance with the HTITU12 format.

Format structure

VARIABLE LENGTH

MAXIMUM LENGTH: 8.438

NUM	FIELD	DESCRIPTION	LON	EN	DEC	TIP	OBSERV.
1	T2CFORMAT	Format identifier	8	8		X	HTITU12
2	T2CERROIB	General IBERCLEAR error code	10	10		X	
3	T2FECOMU	Notification date and time	14	14		N	YYYYMMDD HHMMSS
4	T2REFERCO	Communication reference	35	35		X	
5	T2REFSERV	Owner identification request reference	35	35		X	
6	T2REFRELA	Related request reference	35	35		X	
7	T2CFUNMM	Function of the message	4	4		X	
8	T2UREENV	Message forwarding indicator to the next intermediary	1	1		X	Y/N
9	T2VUMBRL	Minimum threshold of securities with obligation to notify ownership.	18	16	2	N	
10	T2CCALCF	Holding date calculation method	4	4		X	FIFO/LIFO/ PFDT
11	T2COBICP	BIC participant code	11	11		X	
12	T2CVALOR	ISIN code	12	12		X	ISO 6166
13	T2CUENTV	Account number	35	35		X	
14	T2FEVALO	Record date	8	8		N	YYYYMMDD
15	T2FDEADL	Date-time of response to the issuer	14	14		N	YYYYMMDD HHMMSS
16	T2RCLIENT	CCV or equivalent code Reference	20	20		X	
17	T2IDCOT	Trading indicator in nominal amount or units	1	1		X	N/U
18	T2VALOR	Amount of securities	25	16	9	N	
19	T2CTIPTN	Type of holding of the securities	4	4		X	BENE/NOMI /OOAC/UKW N
20	T2FTNPFT	Securities holding date (PFDT)	8	8		N	YYYYMMDD
21	T2NREGIST	Number of the holder records	5	5		N	0/1-25
22	T2NREGISD	Number of address records	5	5		N	0/1
Holder details							
23	T2UREG01	Holder number	2	2		N	01-25
24	T2DNOMBR	Name or corporate name	140	140		X	
25	T2DAPELLI1	First surname	40	40		X	

NUM	FIELD	DESCRIPTION	LON	EN	DEC	TIP	OBSERV.
26	T2DAPELLI2	Second surname	40	40		X	
27	T2DIDENTIF	Holder identification	50	50		X	
28	T2UIDENTIF	Identification type	1	1		X	N/E/O/C/B/I /L/P/T
29	T2UCLASEP	Indication of whether natural or legal person	1	1		X	F/J
30	TIFENAC	Date of birth / Year of incorporation	8	8		N	YYYYMMDD
31	T2CPAIS	Nationality	3	3		N	ISO3166
32	T2UEXTRA	National/foreign indicator	1	1		X	N/E
33	T2UTIPOTI	Holder type	1	1		X	T/N/U/R
34	T2QPROPIE	Percentage ownership:	5	3	2	N	
35	T2QUSUFRU	Usufruct percentage	5	3	2	N	
36	T2CSUCRIP	Subscriber code	4	4		N	
37	T2CERRO01	Holder record error code	10	10		X	
Address Details							
38	T2UREGIDM	Record type	2	2		X	DM
39	T2DOMICILI	Address	40	40		X	
40	T2DPOBLAC	Location	35	35		X	
41	T2CPOSTAL	Post code	5	5		N	
42	T2CPAISRE	Country of residence	3	3		N	ISO3166
43	T2DMAILTO	Recipient's email	256	256		X	
44	T2CERRODM	Holder record error code	10	10		X	

*N: Numeric
X: Alphanumeric

Clarification of fields

- 1 Name: Format identifier
 Content: It will always be completed with the HTITU12 identifier.
 Required field.

- 2 Name: General IBERCLEAR error code
 Content: To report entities, IBERCLEAR will fill in this field with the CNMV literal when the request is at the order of said Commission. In addition, the field will include the SRD2 literal when it is a request under the scope of the Shareholder Rights Directive.
 In response to a wrong HTITU12 the error code will be reported. See errors appendix.
 Optional field to be reported by Iberclear.

- 3 Name: Notification date and time
 Content: File transmission date and time.
 Required field.

- 4 Name: Communication reference
 Content: Reference assigned by that which generates the HTITU12.
 Required field.

- 5 Name: Ownership identification request reference
 Content: Unique and official reference allocated by the issuer or a third party designated by it. Required field.

- 6 Name: Related request reference
 Content: REFERCO reference to which it is related.
 If it is a message with NEWM function, this field will be empty.
 If it is a message with REPL/CANC function, this field will be informed with the communication reference of the immediately previous message.
 If it is a message with ANSW/CANS function, this field will be informed with the communication reference of the immediately previous message sent by the participant entity.
 Optional field.

- 7 Name: Function of the message
 Content: Function of HTITU12 file/message:
 NEWM: Amount of new HTITU12 service.

REPL: It replaces the features of an HTITU12 service.

ANSW: Answer with the ownership requested by the participant. Function used by Iberclear to answer a response from the participant.

CANC: Cancels an HTITU12 service and all its responses at issuer's request.

CANS: Cancels a response sent by a participant.

Required field.

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|----|----------|--|
| 8 | Name: | Indicator of message forwarding to the next intermediary |
| | Content: | <p>Values admitted Y/N.</p> <p>If the value S is reported, it is a request to identify shareholders and final beneficiaries, so if there are NOMI (nominee) holders, the participant must re-send the request to the financial intermediary, so that it can inform the final beneficiaries. (Request for identification of shareholders and beneficiaries).</p> <p>When the indicator is N, the request is not to be sent to financial intermediaries so they may inform the beneficiaries since it is a request to identify shareholders. Participants will provide the ownership of their CCVs or equivalent codes. (Request for identification of shareholders).</p> <p>Required field.</p> |
| 9 | Name: | Minimum threshold of securities with obligation to notify ownership. |
| | Content: | <p>Minimum number of securities for communication of ownership to be mandatory. This field will only be reported in requests that require a minimum threshold to carry out the ownership identification, otherwise it will be reported to spaces.</p> <p>Optional field, supports spaces.</p> |
| 10 | Name: | Holding date calculation method |
| | Content: | <p>In the case of a request in which the holding date has been required, this field will be filled in with the content "PFDT", "LIFO" or "FIFO", as the case may be. Otherwise, it will be reported to spaces.</p> <p>Optional field.</p> |
| 11 | Name: | BIC participant code |
| | Content: | Mandatory field, it will always be reported. |
| 12 | Name: | ISIN code |
| | Content: | <p>ISIN code of the security for which the holders have been requested at the reference date. ISO 6166 code.</p> <p>Required field.</p> |
| 13 | Name: | Account number |

- Content: The account number will be reported when it is sent to the entity as a reply to the processing of the HTITU12 and also when it is sent to the CNMV.
When it is a specific request for identification of beneficial owners, IBERCLEAR will report this field.
Required field.
- 14 Name: Record date
Content: Record date in YYYYMMDD format. The ownership of the securities registered at the closing of this value date will be reported.
It can be past or future, in NEWM, REPL, CANC.
In ANSW and CANS it is always a past date.
Required field.
- 15 Name: Date-time of response of the issuer
Content: Deadline date-time to receive and process the HTITU12-ANSW.
YYYYMMDDHHMMSS format.
Required field.
- 16 Name: CCV or equivalent code reference.
Content: CCV or equivalent code assigned by the participant to that client in the case of third-party accounts or reference that identifies the account in the case of proprietary and individual accounts.
When it is a specific request for identification of beneficial owners, IBERCLEAR will report this field.
Required field.
- 17 Name: Trading indicator in nominal values or monetary units
Content: Indicator of the representation of the values in units (U) or nominal (N).
Required field.
- 18 Name: Amount of securities
Content: Mandatory field in the response of the participants, must be greater than zero.
Required field.
- 19 Name: Type of holding of the securities
Content: Characteristic of the owner of the declared securities. Supported values:
BENE: Ultimate beneficiary.
NOMI: Nominee (financial intermediary).
OOAC: Proprietary securities of a participant in the omnibus account or of third parties.

UKNW: Unknown.
Required field.

- 20 Name: Securities holding date
Content: In the case of a request in which the holding date has been required, this field will be optional. Otherwise, it will be reported to spaces.
Optional field.
- 21 Name: Number of the holder records
Content: Minimum value 1, maximum 25. It supports 0 in the cases of HTITU12-NEWM.
Required field.
- 22 Name: Number of address records
Content: Minimum value 1, maximum 1. It supports 0 in the cases of HTITU12-NEWM.
Required field.

Ownership data (It will not be reported in the cases of HTITU12-NEWM, REPL and CANC)

- 23 Name: Holder number
Content: Sequence of the holders' registers.
From 01 first holder to 25 holders at the most
Required field.
- 24 Name: Name or corporate name
Content: Will be filled in with the full name if it is a natural person, and with the corporate purpose if it is a legal person.
Required field.
- 25 Name: First surname
Content: Will only be filled in if it is a natural person. If not, left blank.
Required field.
- 26 Name: Second surname
Content: Will only be filled in if it is a natural person. If not, left blank.
Required field.
- 27 Name: Holder identification
Content: The identification of the owner will be reported according to the type of identification communicated. This field will be required and its content will be validated according to the established validation rules:
Natural person: Tax ID number (NIF), foreign resident number (NIE), national identification in the country of origin, passport,

CONCAT or other identification.

Legal person: LEI, CIF, BIC or other identification.

- 28 **Name:** Identification type
 Content: Indicate the holder identification type. Will be filled in with the following values:
 For natural person:
 N: Tax ID No
 E: Foreigner ID No.
 I: National identification of the holder in country of origin.
 P: Holder's passport.
 T: CONCAT
 O: Other identification.
 For legal person:
 L: LEI
 C: Tax ID number (CIF):
 B: BIC
 O: Other identification.
 Required field.
- 29 **Name:** Indication of whether natural or legal person
 Content: This will be completed with the following values:
 F: Natural personality.
 J: Legal personality.
 Required field.
- 30 **Name:** Date of birth / Year of Incorporation
 Content: For natural persons, the holder date of birth will be informed. YYYYMMDD format.
 For legal person, this field could be reported as year during which the legal person
 was officially incorporated. YYYY format.
 Optional field.
- 31 **Name:** Nationality
 Content: Will be reported with the code of the holder's country of nationality.
 ISO3166 code. Three-digit numerical code (724 Spain).
 Required field.
- 32 **Name:** National/foreign indicator
 Content: It will be stated whether the holder is Spanish or foreign This will be completed
 with the following values:
 N: National (nationality 724, Spanish).
 E: Foreign (nationality other than 724).

Required field.

- 33 Name: Holder type
Content: This will be completed with the following values:
T: Holder.
N: Bare owner.
U: Usufructuary.
R: Representative.
Required field.
- 34 Name: Percentage ownership:
Content: If it is notified, the ownership percentage in property is indicated. If it is not notified, it will be filled in with zeros.
Optional field.
- 35 Name: Usufruct percentage
Content: If it is notified, the ownership percentage in the usufruct will be indicated. If it is not notified, it will be filled in with zeros.
Optional field.
- 36 Name: Subscriber code
Content: Will be notified with the subscriber code, in accordance with the AEB code. If it is not notified, it will be filled in with zeros.
Optional field.
- 37 Name: Holder record error code
Content: See errors appendix.
Optional field to be reported by Iberclear.

Address data (it will not be reported in cases of HTITU12-NEWM, REPL, CANC)

- 38 Name: Record type
Content: It will be reported with the value of DM.
Required field.
- 39 Name: Address
Content: Will be notified with the holder's address.
Required field.
- 40 Name: Location
Content: Will be notified with the holder's city.

Required field.

- 41

Name:

Content:

Post code

If the address is in Spain, it will be reported with the post code of the city.
If the domicile is abroad, it will be configured as 99nnn, with nnn being the 3-digit numeric country code in accordance with ISO3166.
Required field.
- 42

Name:

Content:

Country of residence

Will report the country of residence.
ISO3166 code. Three-digit numerical code (724 Spain).
Required field.
- 43

Name

Content:

Recipient's email

Optional field.
- 44

Name

Content:

Holder record error code

See errors appendix.
Optional field to be reported by Iberclear.