

Information sheet

Regarding the use of the MVP-filing system „Notifications of voting rights (sec. 33 et seqq. WpHG)“

- Submission of an electronic notification of voting rights -

An electronic notification of major holdings under sec. 33 et seqq. of the German Securities Trading Act (WpHG) can be submitted on BaFin's Reporting and Publishing Platform (MVP-portal) through the MVP-filing system „Notifications of Major Holdings (sec. 33 et seqq. WpHG)“. The MVP-filing system will report the notification in two electronic formats (pdf-file and xml-file) which shall be used for submitting the notification electronically also to the issuer concerned.

Before submitting a notification of voting rights through the MVP-filing system „Notifications of voting rights (sec. 33 et seqq. WpHG)“ you have to register on the MVP-portal and to apply for admission to the MVP-process filing system (for further details please refer to the information sheet “Registration and admission to the MVP-filing system “Notifications of voting rights (sec. 33 et seqq. WpHG)“).

In this information sheet you will be provided with details on the electronic submission of the notification and, in particular, on the Online-Form available in the MVP-filing system „Notifications of Major Holdings (sec. 33 et seqq. WpHG)“. The Online-Form provides for explanation on filling in the Online-Form and, to the extent reasonably possible, for verifications of completeness of the notification. Please refer also to our (future) FAQ in this regards on our homepage.

As an alternative to using the Online-Form, you may upload or submit via BaFin's SOAP-Web-Service an xml of the notification, generated in accordance with the requirements laid down in the respective mapping-document. For further details on BaFin's SOAP-Web-Service and the technical requirements for uploading on the MVP-portal please see the respective user manuals on our homepage.

Please note: It is not possible to submit a draft notification through the MVP-filing system „Notifications of voting rights (sec. 33 et seqq. WpHG)“. Should you require further assistance for filling in the standard form in addition to the support given in the Online-Form and the explanatory documentation, please refer directly to the competent unit within BaFin. For technical support please address your queries to stimmrechte-support@bafin.de.

Step 3¹: Submission of an electronic notification of voting rights

After log in on BaFin's MVP-portal please select „Submit report“

¹ Steps 1 and 2 are described in the information sheet for registration and admission to the MVP-filing system “Notifications of voting rights (sec. 33 ff. WpHG)“.

BaFin Federal Financial Supervisory Authority MVP Portal

BaFin Reporting and Publishing Portal Logged in as:

Welcome to the Reporting and Publishing Portal of the German Federal Financial Supervisory Authority (BaFin). This service facilitates electronic data exchange between your site and BaFin in a secure and easy-to-use way.

You have been registered as a user for this service. As of now you can start to report on the topics you have been assigned.

The state of the reporting and processing of your data, as well as other information of relevance, can be viewed from the log information supplied on this portal. In order to make the reporting and gathering information easier for you, we appreciate any suggestions for improvement.

If you are looking for technical advice or are encountering any problems, don't hesitate to contact our support desk via the email address supplied.
mvp-support@bafin.de

However, we ask you to kindly note that we must confine communications regarding details of particular reporting obligations to personnel officially assigned to reporting within your organisation.

With best regards
 BaFin Technical Team

On the MVP-portal you will see (in the drop-down) all specialised procedures for which you have gotten an admission.

Submit a report

Specialised procedure

Specialised procedure: *

* mandatory field

Refresh / Submit

Please select (from the drop-down) the MVP specialised procedure „Notifications of significant voting rights (sec. 33 et seqq. WpHG)“. You will then be asked to select the „notifier“. If you have been registered as contact person (representative) of a company, please select the company as „notifier“; if you have been registered as „natural person (private individual)“ please select your name. The portal provides for all possible „notifiers“ for which you applied admission to a MVP-filing system in a drop down.

BaFin Federal Financial Supervisory Authority MVP Portal

Submit a report Logged in as:

Specialised procedure

Specialised procedure: Notification of significant voting rights (sec. 33 et seq. WpHG) *

* mandatory field [Change selection](#)

Registered persons/entities subject to the notification requirement

Person/entity subject to the notification requirement: *

* mandatory field

Refresh / Submit

Please note that „registered persons/entities subject to the notification requirement“ does not refer to the person subject to the notification obligation pursuant sec. 33 et seqq. WpHG (sec. 3 of the standard form), but to the person who is going to submit the notification.

E.g.: Mr. T of "T Invest plc" would select „T Invest plc“ as notifier, Mrs. T „T Lawyers“ and Mr. B himself.²

After selecting the notifier you will be requested to select the type of submission:

BaFin Federal Financial Supervisory Authority
MVP Portal

Submit a report Logged in as:

Language
Deutsch
English

General information
Home
Documentation / Help
Logout

Specialised procedure
Submit report
View journal
Application for a specialised procedure
Cancel specialised procedure
View application list

User account

Specialised procedure
Specialised procedure: Notification of significant voting rights (sec. 33 et seq. WpI) *
* mandatory field [Change selection](#)

Registered persons/entities subject to the notification requirement
Person/entity subject to the notification requirement: *
* mandatory field [Change selection](#)

Submission
Submission: *
* mandatory field

[Refresh / Submit](#)

Information: To submit large number reports or make automated reports via a web service you have to know the identification number for your person/entity subject to the notification requirement. The identification number of the current person/entity subject to the notification requirement is:
For more information on this topic please refer to the documentation.

The identification number is only required if you submit a notification via BaFin's soap-webservice, otherwise not.

Please select "Notification of significant voting rights".

Submission

Submission: Notification of significant voting rights *
* mandatory field [Change selection](#)

Step 4: Submission of notifications via upload or Online-Form

After selecting the type of submission you will be able to select whether you intend to submit the notification via upload as xml-file or via BaFin's Online-Form.

² Examples from „Step 1: Registration on MVP as „notifier“.

Submit form

Please click here to submit your report via a web form:

[Fill in form](#)

Submit XML report

In order to submit your report as a XML file please choose the file here:

The requested structure of the XML report depends of the specialised procedure. Please see the documentation for more information.

Step 4.1: Upload of the notification as xml-file

For an upload of the notification as xml-file according to the instructions provided on the website of the MVP-filling system "Notifications of voting rights (sec. 33 ff. WpHG)" please refer to BaFin's user manual "XML-upload" (https://www.bafin.de/EN/DieBaFin/Service/MVPportal/MVPportal_node_en.html). Please make sure that your xml-file complies with the requirements of the MVP-specialised procedure as described in the respective instruction document ("Dokumentation zur Erstellung von Stimmrechtsmitteilungen im XML-Format"; the documentation will soon be available also in the English language).

The xml-file can be selected by clicking "Durchsuchen" and be submitted by clicking "Submit file".

Submit XML report

In order to submit your report as a XML file please choose the file here:

The requested structure of the XML report depends of the specialised procedure. Please see the documentation for more information.

For the further steps please refer to step 5 below.

Step 4.2: Filling in the Online-Form

Instead of uploading the notification as xml-file MVP provides for an Online-Form which can be filled in and submitted to BaFin. The Online-Form contains certain cross-checks of your entries as well as an automated calculation of certain figures, which, to the extent

reasonably possible, are deemed to help preventing an incomplete or incorrect notification:

- Fill-in information will pop up, if your cursor triggers the ⓘ-symbol.
- The Online-Form is to be completed comprehensively. To the extent reasonably possible, the Online-Form may recognize certain inconsistencies or incompleteness of the notification. If so you will either not be able to submit the notification or get asked to double-check your entries.
- Session: The session time is 30 minutes; after 30 minutes of inactivity the Online-Form gets discarded.
- Due to technical reasons it is not possible to interrupt the fill in-process and save the entries made so far; it is also impossible to retrieve a previous notification.

Further Details on how to make entries in the Online-Form will be provided as soon as possible

Step 5: Copy of notification for documentation and submission to issuer

Shortly after submitting the notification you will be able to track the filing process under "View journal" in your MVP-account:

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MVP Portal

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With best regards
BaFin Technical Team

Language
Deutsch
English

General information
Home
Documentation / Help
Logout

Specialised procedure
Submit report
View journal
Application for a specialised procedure
Cancel specialised procedure
View application list

User account

A list of all submitted notifications will be displayed:



Language
Deutsch
English

General information
Home
Documentation / Help
Logout

Specialised procedure
Submit report
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Cancel specialised procedure
View application list

User account

Filter

Date of report from: (DD/MM/YYYY or DD/MM/YYYY HH:MM)
 Date of report to: (DD/MM/YYYY or DD/MM/YYYY HH:MM)
 Specialised procedure:
 Person/entity subject to the notification requirement:
 Status:
 Filename: (Wildcards "*", "?" allowed)
 Client reference: (Wildcards "*", "?" allowed)

Id	Date of report	Specialised procedure	Submission	Person/entity subject to the notification requirement	Client reference	Reporting channel	Filename	Status
			Feedback (text)			Feedback (file)		
104594	22/05/2018 14:21:16	Notification of significant voting rights (sec. 33 et seq. WpHG)	Notification of significant voting rights	COMMERZBANK Aktiengesellschaft, Frankfurt am Main		Web form		Report accepted
		Notification successful processed.				Feedback_104594.zip (ZIP, 17 KB)		
104554	14/05/2018 11:19:46	Notification of significant voting rights (sec. 33 et seq. WpHG)	Notification of significant voting rights	COMMERZBANK Aktiengesellschaft, Frankfurt am Main		Web form		Report accepted
		Notification successful processed.				Feedback_104554.zip (ZIP, 18 KB)		

Under status you will be informed of the filing progress starting with „Report submitted“. If the notification will have been submitted successfully the status will switch to “Report accepted“. At the same time a zip-file (“feedback_...”) will be provided containing the notification as pdf-file and as xml-file. Both files are deemed to be forwarded to the issuer and contain therefore only the information which has to be published by the issuer, i.e. the files do not contain annex and the organizational chart, if one has been uploaded. If you open the zip-file, both files will be displayed:

Name	Typ	Komprimierte Größe	Kennwortge...	Größe	Verhältnis	Änderungsdatum
NotificationOfMajorHoldings_104548	PDF Document	19 KB	Nein	22 KB	15%	11.05.2018 07:54
NotificationOfMajorHoldings_104548	XML-Dokument	1 KB	Nein	4 KB	71%	11.05.2018 07:54

The zip-file should be downloaded and saved locally. The time stamp correlates approximately with the point in time BaFin will have received your notification.

According to the applicable ordinance-provisions (StimmRMV) it will not be sufficient to submit to the issuer the notification only as “readable” version or only as xml-file; the notifying party will have to submit to the issuer always both versions if he submits the notification electronically.

The StimmRMV does not provide for specific requirements on how to submit a notification electronically to the issuer. However, it does not prevent the issuer to set up specific requirements, e.g. submission of both files via an electronic portal. If the issuer does not provide for a specific submission process submitting via email to an address appointed for general electronic communication (e.g. email-address from “Legal info” of the issuer’s homepage) will be sufficient.