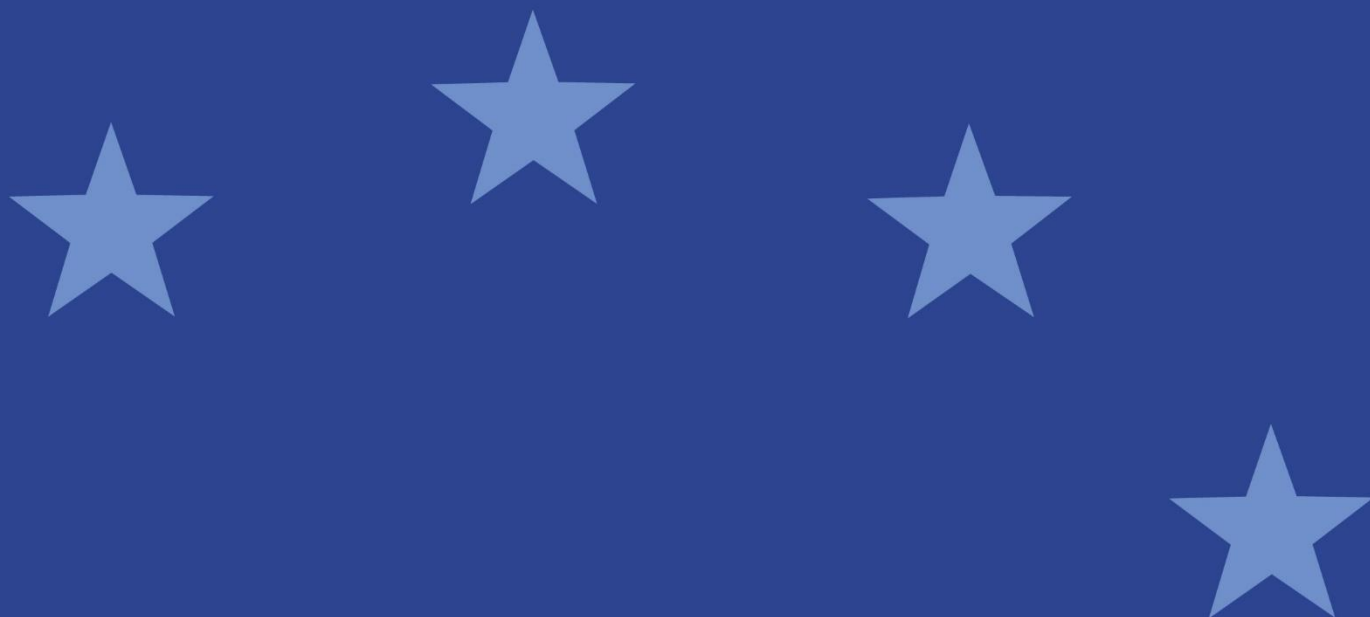


# Practical Guide

## National rules on notifications of major holdings under the Transparency Directive



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## Glossary

CEIFs	Closed Ended Investment Funds
ESMA	European Securities and Markets Authority
L2D	Level 2 Directive (Commission Directive 2007/14/EC of 8 March 2007 laying down detailed rules for the implementation of certain provisions of Directive 2004/109/EC on the harmonisation of transparency requirements in relation to information about issuers whose securities are admitted to trading on a regulated market)
NCA	National Competent Authority
Takeover Bids Directive	Directive 2004/25/EC of the European Parliament and of the Council of 21 April 2004 on takeover bids
TD/Transparency Directive	Directive 2004/109/EC of the European Parliament and of the Council of 15 December 2004 on the harmonisation of transparency requirements in relation to information about issuers whose securities are admitted to trading on a regulated market and amending Directive 2001/34/EC including subsequent amendments.

## List of country acronyms

AT	Austria
BE	Belgium
BG	Bulgaria
CY	Cyprus
CZ	Czech Republic
DE	Germany
DK	Denmark
EE	Estonia
EL	Greece
ES	Spain
FI	Finland
FR	France
HR	Croatia
HU	Hungary
IE	Ireland
IS	Iceland
IT	Italy
LT	Lithuania
LU	Luxembourg
LV	Latvia
MT	Malta
NL	Netherlands
NO	Norway
PL	Poland
PT	Portugal
RO	Romania
SE	Sweden
SI	Slovenia
SK	Slovakia

## Introduction

### Reasons for publication

This Practical Guide is an information document which summarises the main rules and practices applicable across the European Economic Area<sup>1</sup> (EEA) in relation to notifications of major holdings under national law in accordance with the Transparency Directive. The Practical Guide is intended as an aide to market participants and may be particularly helpful to shareholders with notification obligations under national law in accordance with the Transparency Directive.

### Content

Part I of the Practical Guide sets out a summary of the main rules and practices in relation to making and publishing notifications of major holdings under national law in accordance with the Transparency Directive. Information is presented on a country-by-country basis to allow market participants to easily identify information about the jurisdiction(s) of interest to them. The focus is on on-exchange transactions based on the assumption that these trigger the majority of notification obligations under the Transparency Directive.

Part II of the Practical Guide presents key data i.e. information on notification thresholds, the triggering event, the deadline for learning of the triggering event, the deadline for making a notification as well as permitted channels and format for the filing of such and the deadline for publishing a notification. Information in Part II is organised in transversal tables, making it possible to compare rules across different jurisdictions.

### Status of information and updates to the Practical Guide

The Practical Guide has been compiled on the basis of information provided by National Competent Authorities under the Transparency Directive. Any queries regarding Member State specific content should be addressed directly to the relevant National Competent Authority in that Member State.

ESMA is responsible only for the accurate reproduction of the information received from the National Competent Authorities. ESMA does not provide any representation or warranty that the content of the Practical Guide is complete, accurate or up to date.

ESMA will update the Practical Guide on an ad hoc basis as and when necessary based on changes to national rules and practices. However, there may be a small delay between the time at which a change takes place nationally and the time at which the Practical Guide is amended. If any discrepancy is identified between the information in the Practical Guide and legislation or rules published by national legislators or National Competent Authorities, priority should be given to the latter.

The current version of the Practical Guide was published on xx 15 December 2022 and incorporates changes to information relating to several NCAs<sup>2</sup>.

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<sup>1</sup> Information about Liechtenstein is not included in this document.

<sup>2</sup> AT, BE, CY, CZ, DE, DK, ES, FI, FR, HR, LT, LU, LV, MT, NL, NO, PL, RO and SI.

## **PART I:**

# **COUNTRY-BY-COUNTRY SUMMARY OF NATIONAL REQUIREMENTS REGARDING NOTIFICATIONS OF MAJOR HOLDINGS UNDER NATIONAL LAW IN ACCORDANCE WITH THE TRANSPARENCY DIRECTIVE**

Part I of the Practical Guide contains a fact sheet for each country, setting out the national requirements in relation to notification of major holdings under the Transparency Directive. The individual fact sheets each have four distinct sections:

- Section A presents general information regarding the competent authority, the notification thresholds applied in each jurisdiction as well as a hyperlink in case more information regarding rules on notification of major holdings is required.
- Section B describes the requirements in relation to the notification process, i.e. whether the use of a standard form is required, the triggering event for on-exchange transactions and passive crossings, the notification deadline for on-exchange transactions, the permitted channels and formats for the filing of a notification, whether notifications are required to be signed as well as the rules on intra-day netting.
- Section C provides information on the entity responsible for publication of a notification and the deadline for such publication.
- Finally, section D contains a hyperlink to the standard form for the notification of major holdings if such a standard form is used as well as a hyperlink to the national central storage mechanism for regulated information (OAM) and contact details for the National Competent Authority.

## Austria

A. General information	
National Competent Authority	Financial Market Authority (FMA)
Applicable national notification thresholds <sup>3</sup> (percentages)	3 <sup>4</sup> , 4, 5, 10, 15, 20, 25, 30, 35, 40, 45, 50, 75, 90
For further information, please refer to	<a href="https://www.fma.gv.at/en/capital-markets/disclosure-requirements/major-holdings/">https://www.fma.gv.at/en/capital-markets/disclosure-requirements/major-holdings/</a>

B. Filing of a notification	
Standard form	Required (for link please see section D below)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Sec. 130 para 1 BörseG <i>On-exchange transactions are transactions which are carried out on a regulated market.</i></li> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Sec. 130 para. 2 BörseG</li> </ul>	<p>Settlement date</p> <p>Registration of new shares</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Sec. 130 para. 1 BörseG</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Two trading days following triggering events <sup>5</sup>

<sup>3</sup> Furthermore, the thresholds stated by the issuer in its by-laws pursuant to Sec. 27 para. 1 no. 1 of the Austrian Takeover Act are applicable notification thresholds pursuant to Sec. 130 para. 1 of BörseG as well.

<sup>4</sup> In Austria, the threshold of 3% applies only to issuers which have stipulated this threshold value in their articles of association. A special condition for this to become effective is the publication of the relevant clause of the articles of association on the issuer's website and a notification to the FMA.

<sup>5</sup> Although the notifiable person shall be deemed to have knowledge of the triggering event no later than two trading days following the transaction and the deadline for making the notification shall be no later than two further trading days, in general, the notification shall be submitted promptly but not later than two trading days after the threshold was crossed.



<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Signature of notification required when notification is submitted</p>	<p>Digital portal (<a href="https://www.fma.gv.at/en/capital-markets/disclosure-requirements/major-holdings/">https://www.fma.gv.at/en/capital-markets/disclosure-requirements/major-holdings/</a>)</p> <p>No rule</p> <p>Email   Post Fax</p> <p>No rule</p> <p>To the NCA: No   To the issuer: No</p>
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	<p>Permitted</p>

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / Sec. 135 para. 2 BörseG	Issuer
Deadline for publication after the date of receipt of the notification	Two trading days after the date of receipt of the notification

### D. Further information

Link to standard form (if applicable)	<a href="https://www.fma.gv.at/en/capital-markets/disclosure-requirements/major-holdings/">https://www.fma.gv.at/en/capital-markets/disclosure-requirements/major-holdings/</a>
Link to national central storage mechanism for regulated information (OAM)	<a href="http://issuerinfo.oekb.at/startpage.html">http://issuerinfo.oekb.at/startpage.html</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:marktaufsicht@fma.gv.at">marktaufsicht@fma.gv.at</a>

## Belgium

A. General information	
National Competent Authority	Financial Services and Markets Authority (FSMA)
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 30, 35, 40, 45, 50, 55, 60, 65, 70, 75, 80, 85, 90, 95
For further information, please refer to	<a href="https://www.fsma.be/en/shareholding-structure-0">https://www.fsma.be/en/shareholding-structure-0</a>

B. Filing of a notification	
Standard form	Optional but in practice always used
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Art. 8, 1° Law of 2 May 2007</li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Art. 8, 3° Law of 2 May 2007</li> </ul>	<p>Trade date</p> <p>Registration of new shares</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Art. 12, 1° Law of 2 May 2007 and Art. 5 RD of 14 February 2008</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Six trading days following triggering event
<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul>	<p>Email (<a href="mailto:trp.fin@fsma.be">trp.fin@fsma.be</a>)</p> <p>Excel   Readable PDF</p>

Notifying the issuer - Permitted channel(s) - Permitted format(s) Signature of notification required when notification is submitted	Email Readable PDF To the NCA: Yes To the issuer: Yes
Intra-day netting <i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i>	Permitted

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / Art. 14 Law of 2 May 2007	Issuer
Deadline for publication after the date of receipt of notification	Three trading days after the day on which the notification was received

### D. Further information

Link to standard form (if applicable)	<a href="https://www.fsma.be/sites/default/files/media/files/replacement_files/tr-1be-en.xlsm">https://www.fsma.be/sites/default/files/media/files/replacement_files/tr-1be-en.xlsm</a>
Link to national central storage mechanism for regulated information (OAM)	<a href="http://stori.fsma.be/Pages/Search.aspx?PageID=f3b9f276-36ab-42ae-9c7d-7b29492756f5">http://stori.fsma.be/Pages/Search.aspx?PageID=f3b9f276-36ab-42ae-9c7d-7b29492756f5</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:trp.fin@fsma.be">trp.fin@fsma.be</a>

## Bulgaria

A. General information	
National Competent Authority	Financial Supervision Commission (FSC)
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 30, 35, 40, 45, 50, 55, 60, 65, 70, 75, 80, 85, 90, 95
For further information, please refer to	<a href="http://www.fsc.bg/en/markets/capital-market/legal-framework/laws/">http://www.fsc.bg/en/markets/capital-market/legal-framework/laws/</a> <sup>6</sup>

B. Filing of a notification	
Standard form	Required (for link please see section D below)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Article 145 and following of Public Offering of Securities Act in conjunction with article 127 par. 2 of Rules of procedure of Central Depository AD</li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Article 127 par. 1 of Public Offering of Securities Act in conjunction with article 110 of Rules of procedure of Central Depository AD</li> </ul>	<p>Settlement date</p> <p>Registration of new shares</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Article 148 par. 3 of Public Offering of Securities Act</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Six trading days following triggering event

<sup>6</sup> Article 145 and following of Public Offering of Securities Act.

<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> </ul>	<p>Email (<a href="mailto:delovodstvo@fsc.bg">delovodstvo@fsc.bg</a>; <a href="mailto:bg_fsc@fsc.bg">bg_fsc@fsc.bg</a>)</p> <p>Fax (+35928294324)</p>	<p>Post (1000 Sofia, 16 Budapeshta str., Bulgaria)</p>
<ul style="list-style-type: none"> <li>- Permitted format(s)</li> </ul>	<p>Word</p>	
<p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> </ul>	<p>Email</p> <p>Fax</p>	<p>Post</p>
<ul style="list-style-type: none"> <li>- Permitted format(s)</li> </ul>	<p>Word</p>	
<p>Signature of notification required when notification is submitted</p>	<p>To the NCA: Yes</p>	<p>To the issuer: Yes</p>
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	<p>Not permitted</p>	

### C. Publication of a notification

<p>Entity responsible for publishing notifications under TD Art. 12 / Article 148b of Public Offering of Securities Act</p>	<p>Issuer</p>
<p>Deadline for publication after the date of receipt of notification</p>	<p>Three trading days after the day on which the notification was received</p>

### D. Further information

<p>Link to standard form (if applicable)</p>	<p><a href="http://www.fsc.bg/en/administrative-documents/template">http://www.fsc.bg/en/administrative-documents/template</a></p>
<p>Link to national central storage mechanism for regulated information (OAM)</p>	<p><a href="http://www3.fsc.bg/eregnews/index.jsp?action">http://www3.fsc.bg/eregnews/index.jsp?action</a></p>
<p>Contact details for National Competent Authority if further information is needed</p>	<p><a href="mailto:alexova_d@fsc.bg">alexova_d@fsc.bg</a></p>

## Croatia

### A. General information

National Competent Authority	Croatian Financial Services Supervisory Agency (HANFA)
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 30, 50, 75
For further information, please refer to	<a href="http://www.hanfa.hr/EN/nav/189/capital-market-act-.html">http://www.hanfa.hr/EN/nav/189/capital-market-act-.html</a> <sup>7</sup>

### B. Filing of a notification

Standard form	No standard form For the content of the notification please see Article 486 of the Capital Market Act
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Article 482 paragraph 2 point 1 and Article 487 of the Capital Market Act <i>On-exchange transactions are transactions which are carried out on a regulated market.</i></li> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Article 482 paragraph 2 point 2 and Article 487 of the Capital Market Act</li> <li>- Deadline for publication under TD Art. 15</li> </ul>	<p>Trade date</p> <p>Publication under TD Art. 15 / Article 473 of the Capital Market Act</p> <p>End of month</p>

<sup>7</sup> Articles 472 to 499 of the Capital Market Act.

<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Article 487 of the Croatian Capital Market Act</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Four trading days following triggering event
<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Signature of notification required when notification is submitted</p>	<p>Post (Franje Račkoga 6, 10000 Zagreb, Croatia)</p> <p>No rule</p> <p>No rule</p> <p>No rule</p> <p>To the NCA: Yes      To the issuer: Yes</p>
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	Not permitted

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / Article 472 of the Capital Market Act	Issuer
Deadline for publication after the date of receipt of notification	Two trading days after the day on which the notification was received

### D. Further information

Link to standard form (if applicable)	Not applicable
Link to national central storage mechanism for regulated information (OAM)	<a href="http://www.hanfa.hr/srpi.html">http://www.hanfa.hr/srpi.html</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:transparentnost@hanfa.hr">transparentnost@hanfa.hr</a>

## Cyprus

A. General information	
National Competent Authority	Cyprus Securities and Exchange Commission (CySEC)
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 30, 50, 75
For further information, please refer to	<a href="http://www.cysec.gov.cy/en-GB/legislation/issuers/TRANSPARENCY/">http://www.cysec.gov.cy/en-GB/legislation/issuers/TRANSPARENCY/</a>

B. Filing of a notification	
Standard form	Required (for link please see section D below)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Article 33(1)(a)(i) of the Transparency Requirements (Securities Admitted to Trading on a Regulated Market) Law of 2007, L.190(I)/2007, as amended ('Transparency Law')</li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Article 28(3) of the Transparency Law</li> <li>- Deadline for publication under TD Art. 15</li> </ul>	<p>Trade date</p> <p>Publication under TD Art. 15 / Article 18 of the Transparency Law</p> <p>End of month</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Articles 33(1) and 33(2) of the Transparency Law</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Five trading days following triggering event



<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> </ul>	<p>Email <a href="mailto:issuers@cysec.gov.cy">issuers@cysec.gov.cy</a></p> <p>Fax (+35722506700)</p>	<p>Post (19 Diagorou Street, 1097 Nicosia, Cyprus; P.O BOX 24996 1306 Nicosia, Cyprus)</p>
<ul style="list-style-type: none"> <li>- Permitted format(s)</li> </ul>	No rule	
<p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul>	No rule	
<p>Signature of notification required when notification is submitted</p>	To the NCA: Yes	To the issuer: Yes
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	Permitted	

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / Article 19 of the Transparency Law	Issuer
Deadline for publication after the date of receipt of notification	On the trading day after the day on which the notification was received

### D. Further information

Link to standard form (if applicable)	<a href="http://www.cysec.gov.cy/en-GB/legislation/issuers/TRANSPARENCY/#">http://www.cysec.gov.cy/en-GB/legislation/issuers/TRANSPARENCY/#</a>
Link to national central storage mechanism for regulated information (OAM)	<a href="http://oam.cse.com.cy/Announcement/Search">http://oam.cse.com.cy/Announcement/Search</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:issuers@cysec.gov.cy">issuers@cysec.gov.cy</a> For the attention of the Issuers Department

## Czech Republic

A. General information	
National Competent Authority	Czech National Bank
Applicable national notification thresholds (percentages)	1 <sup>8</sup> , 3 <sup>9</sup> , 5, 10, 15, 20, 25, 30, 40, 50, 75
For further information, please refer to	<a href="https://www.cnb.cz/en/supervision-financial-market/conduct-of-supervision/information-duties-of-financial-market-entities-vis-a-vis-the-czech-national-bank/regular-reporting-of-issuers-and-other-persons/">https://www.cnb.cz/en/supervision-financial-market/conduct-of-supervision/information-duties-of-financial-market-entities-vis-a-vis-the-czech-national-bank/regular-reporting-of-issuers-and-other-persons/</a>
B. Filing of a notification	
Standard form	Required (for link please see section D below)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Capital Market Undertakings Act No 256/2004 Coll., Section 122(1)</li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Capital Market Undertakings Act No 256/2004 Coll., Section 122a(1)</li> </ul>	<p>Settlement date</p> <p>For capital decreases: The registration date in the company register</p> <p>For capital increases: The date determined by the issuer at the shareholders' meeting which will be not prior to the exercise of subscription rights and not later than on the registration date in the company register</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Capital Market Undertakings Act No 256/2004 Coll., Section 122(4)</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Six trading days following triggering event

<sup>8</sup> The 1% threshold only applies to holdings in companies with share capital > 500m CZK.

<sup>9</sup> The 3% threshold only applies to holdings in companies with share capital > 100m CZK.

<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Signature of notification required when notification is submitted</p>	<p>Digital portal (<a href="http://www.cnb.cz/cnb/sipres_en">http://www.cnb.cz/cnb/sipres_en</a>)</p> <p>Word</p> <p>No rule</p> <p>Word</p> <p>To the NCA: Yes</p>	<p>Post (Česká národní banka, Senovážná 3, 115 03 Praha 1)</p> <p>Readable PDF</p> <p>Readable PDF</p> <p>To the issuer: No</p>
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	Permitted	

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / Capital Market Undertakings Act No 256/2004 Coll., Section 122(7)	National Competent Authority
Deadline for publication after the date of receipt of notification	Three trading days after the day on which the notification was received

### D. Further information

Link to standard form (if applicable)	<a href="https://www.cnb.cz/export/sites/cnb/en/supervision-financial-market/galleries/conduct_of_supervision/information_duties/issuers_other_entities/download/form_for_notification_of_major_holdings_template_7.docx">https://www.cnb.cz/export/sites/cnb/en/supervision-financial-market/galleries/conduct_of_supervision/information_duties/issuers_other_entities/download/form_for_notification_of_major_holdings_template_7.docx</a>
Link to national central storage mechanism for regulated information (OAM)	<a href="https://www.cnb.cz/cnb/oam_en">https://www.cnb.cz/cnb/oam_en</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:podatelna@cnb.cz">podatelna@cnb.cz</a>

## Denmark

A. General information	
National Competent Authority	The Danish FSA
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 1/3, 50, 2/3, 90
For further information, please refer to	<a href="https://www.finanstilsynet.dk/Lovgivning/Information-om-udvalgte-tilsynsomraader/Storaktionaerer">https://www.finanstilsynet.dk/Lovgivning/Information-om-udvalgte-tilsynsomraader/Storaktionaerer</a>

B. Filing of a notification	
Standard form	Required (for link please see section D below)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / section 29(1) of the Securities Trading etc. Act. <i>On-exchange transactions are transactions which are carried out on a regulated market.</i></li> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / section 29(1) of the Securities Trading etc. Act.</li> <li>- Deadline for publication under TD Art. 15</li> </ul>	<p>Trade date</p> <p>Publication under TD Art. 15 / section 10 of the executive order on issuers' duty to provide information</p> <p>End of month</p>

<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / section 29(1) of the Securities Trading etc. Act. and section 3(1) of the Executive Order on Major Shareholder</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	<p>Same trading day as triggering event</p>
<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Signature of notification required when notification is submitted</p>	<p>Digital portal (<a href="https://oam.finanstilsynet.dk/#/">https://oam.finanstilsynet.dk/#/!</a>)</p> <p>No rule</p> <p>No rule</p> <p>No rule</p> <p>To the NCA: Yes   To the issuer: No</p>
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	<p>Not permitted</p>

### C. Publication of a notification

<p>Entity responsible for publishing notifications under TD Art. 12 / section 29(1) of the Securities Trading etc. Act and section 3 of the Executive Order on Major Shareholder</p>	<p>Issuer</p>
<p>Deadline for publication after the date of receipt of notification</p>	<p>On the day on which the notification was received</p>

### D. Further information

<p>Link to standard form (if applicable)</p>	<p><a href="https://www.finanstilsynet.dk/Lovgivning/Information-om-udvalgte-tilsynsomraader/Storaktionaerer/Indberetning">https://www.finanstilsynet.dk/Lovgivning/Information-om-udvalgte-tilsynsomraader/Storaktionaerer/Indberetning</a></p>
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Link to national central storage mechanism for regulated information (OAM)	<a href="https://oam.finanstilsynet.dk/#/">https://oam.finanstilsynet.dk/#/</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:pbu@ftnet.dk">pbu@ftnet.dk</a>

## Estonia

A. General information	
National Competent Authority	Finantsinspektsioon
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 1/3, 50, 2/3
For further information, please refer to	<a href="http://www.fi.ee/index.php?id=11886">http://www.fi.ee/index.php?id=11886</a>
B. Filing of a notification	
Standard form	Optional (the use of the standard form is not obligatory, but recommended)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Securities Market Act § 185(1) <i>On-exchange transactions are transactions which are carried out on a regulated market.</i></li> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Securities Market Act § 185(2)</li> <li>- Deadline for publication under TD Art. 15</li> </ul>	<p>Trade date</p> <p>Publication under TD Art. 15 / Securities Market Act § 187-5</p> <p>The issuer is required to publish any changes in the total number of voting rights and the size of the capital promptly</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Securities Market Act § 185-2</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Six trading days following triggering event

Notifying the National Competent Authority - Permitted channel(s)  - Permitted format(s)	Email ( <a href="mailto:info@fi.ee">info@fi.ee</a> ) Fax (+3726680501)	Post (Finantsinspektsioon, Sakala 4, 15030 Tallinn, Estonia)
Notifying the issuer - Permitted channel(s) - Permitted format(s)	No rule  No rule	
Signature of notification required when notification is submitted	To the NCA: Yes	To the issuer: Yes
Intra-day netting <i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i>	Not permitted	

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / Securities Market Act § 186	Issuer
Deadline for publication after the date of receipt of notification	Three trading days after the day on which the notification was received

### D. Further information

Link to standard form (if applicable)	<a href="http://www.fi.ee/index.php?id=11886">http://www.fi.ee/index.php?id=11886</a>
Link to national central storage mechanism for regulated information (OAM)	<a href="http://oam.fi.ee/et/home;jsessionid=3BE72917B0D1808D4D70A88D0E9019FA">http://oam.fi.ee/et/home;jsessionid=3BE72917B0D1808D4D70A88D0E9019FA</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:info@fi.ee">info@fi.ee</a>



## Finland

A. General information	
National Competent Authority	Finanssivalvonta (FIN-FSA)
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 30, 50, 2/3, 90 (shares and voting rights)
For further information, please refer to	<a href="http://www.finanssivalvonta.fi">Notification of major holdings - Issuers and investors - www.finanssivalvonta.fi</a>

B. Filing of a notification	
Standard form	Optional (The notification should be made in writing on the notification form. However, other formats are also allowed.)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / the Securities Markets Act, chapter 9, section 5</li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / the Securities Markets Act, chapter 9, section 5</li> <li>- Deadline for publication under TD Art. 15 publication</li> </ul>	<p>Trade date</p> <p>Publication under TD Art. 15 / the Securities Markets Act, chapter 8, section 6</p> <p>End of month</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / the Securities Markets Act, chapter 9, section 9</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Three trading days following triggering event

<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Signature of notification required when notification is submitted</p>	<p>Email (<a href="mailto:kirjaamo@finanssivalvonta.fi">kirjaamo@finanssivalvonta.fi</a>)</p> <p>No rule</p> <p>No rule</p> <p>No rule</p> <p>To the NCA: No      To the issuer: No</p>
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	<p>Permitted</p>

### C. Publication of a notification

<p>Entity responsible for publishing notifications under TD Art. 12 / the Securities Markets Act, chapter 9, section 10</p>	<p>Issuer</p>
<p>Deadline for publication after the date of receipt of notification</p>	<p>Publication of the notification should be made as soon as possible; this will in most cases be on the day when the notification was made but the issuer may delay publication in order to receive corrected or supplementary information in relation to the notification</p>

### D. Further information

<p>Link to standard form (if applicable)</p>	<p><a href="http://www.finanssivalvonta.fi">Notification of major holdings - Issuers and investors - www.finanssivalvonta.fi</a></p>
<p>Link to national central storage mechanism for regulated information (OAM)</p>	<p><a href="https://csf.omxgroup.com/cns-web/oam/Search.action?request_locale=fi">https://csf.omxgroup.com/cns-web/oam/Search.action?request_locale=fi</a></p>
<p>Contact details for National Competent Authority if further information is needed</p>	<p>Ms Marianne Demecs, Senior Market Supervisor, tel. +358 9 183 5366  Ms Anna Sahrakorpi, Market Supervisor, tel. +358 9 183 5458  Mr Rickard Sandell, Market Supervisor, tel. +358 9 183 5353</p>

## France

A. General information	
National Competent Authority	Autorité des marchés financiers (AMF)
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 30, 1/3, 50, 2/3, 90, 95
For further information, please refer to	<a href="https://www.amf-france.org/en/professionals/professional-investor/my-relations-amf/major-holding">https://www.amf-france.org/en/professionals/professional-investor/my-relations-amf/major-holding</a>

B. Filing of a notification	
Standard form	Required (for link please see section D below)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Article 233-7 of the French Commercial Code</li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Article 233-7 of the French Commercial Code</li> </ul>	<p>Trade date</p> <p>Settlement date</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Article 233-7 of the French Commercial Code</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Four trading days following triggering event

Notifying the National Competent Authority <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> </ul>	Email <a href="mailto:declarationseuil@amf-france.org">(<a href="mailto:declarationseuil@amf-france.org">declarationseuil@amf-france.org</a>)</a> Fax (+0033(0)15345-6250)	Post (17, place de la bourse, 75082 Paris Cedex 02)
<ul style="list-style-type: none"> <li>- Permitted format(s)</li> </ul>	Word	Readable PDF
Notifying the issuer <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> </ul>	No rule	
<ul style="list-style-type: none"> <li>- Permitted format(s)</li> </ul>	Word	Readable PDF
Signature of notification required when notification is submitted	To the NCA: Yes	To the issuer: Yes
Intra-day netting <i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i>	Permitted	

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / Article 233-7 of the French Commercial Code	National Competent Authority
Deadline for publication after the date of receipt of notification	Three trading days after the day on which the notification was received

### D. Further information

Link to standard form (if applicable)	<a href="https://www.amf-france.org/en/forms-and-declarations/listed-companies-and-corporate-financing/major-holding-notifications-intentions">https://www.amf-france.org/en/forms-and-declarations/listed-companies-and-corporate-financing/major-holding-notifications-intentions</a>
Link to national central storage mechanism for regulated information (OAM)	<a href="http://www.info-financiere.fr/">http://www.info-financiere.fr/</a>

Contact details for National Competent Authority if further information is needed

Autorité des marchés financiers - AMF  
Direction des Emetteurs  
17, place de la bourse  
75082 PARIS Cedex 02  
E-mail: [declarationseuil@amf-france.org](mailto:declarationseuil@amf-france.org)  
Tel.: +00 33 (0)1 5345-6280  
Fax: +00 33 (0)1 5345-6268

## Germany

### A. General information

National Competent Authority	Bundesanstalt für Finanzdienstleistungsaufsicht - BaFin (Federal Financial Supervisory Authority)
Applicable national notification thresholds (percentages)	3 <sup>10</sup> , 5, 10, 15, 20, 25, 30, 50, 75
For further information, please refer to	<a href="http://www.bafin.de">www.bafin.de</a> (also available in English)

### B. Filing of a notification

Standard form	Required (for link please see section D below)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / § 21 WpHG <i>On-exchange transactions are transactions which are carried out on a regulated market.</i></li> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / § 21 WpHG</li> </ul>	<p>Trade date</p> <p>Registration of new shares</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / § 21 WpHG</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	<p>Four<sup>11</sup> trading days following triggering event</p>

<sup>10</sup> The 3% threshold applies only for notifying voting rights (TD Art. 9/10), but not for positions arising out of financial instruments (TD Art. 13) or aggregated positions (TD Art. 13a).

<sup>11</sup> Although the legal provisions provide for two plus four trading days, in practice the disclosure of a notification to BaFin and to the issuer is generally expected within four trading days irrespectively of the composition of this deadline. Only in very extraordinary cases may the maximum deadline of six trading days apply.

<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channels</li> <li>- Permitted format(s)</li> </ul>	<p>BAFIN's MVP-portal Online form or upload of defined xml-file</p>		
<p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channels</li> <li>- Permitted format(s)</li> </ul>	<p>Email Readable format (e.g. pdf) and defined xml-file (as footnote: Both files get provided by BaFin's system after having filed in BaFin's MVP-portal.)</p>		
<p>Signature of notification required when notification is submitted</p>	<table border="1"> <tr> <td>To the NCA: No</td> <td>To the issuer: No</td> </tr> </table>	To the NCA: No	To the issuer: No
To the NCA: No	To the issuer: No		
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	<p>Permitted (only if voting rights do not get exercised on the day of transactions)</p>		

### C. Publication of a notification

<p>Entity responsible for publishing notifications under TD Art. 12 / § 26 WpHG</p>	<p>Issuer</p>
<p>Deadline for publication after the date of receipt of notification</p>	<p>Three trading days after the day on which the notification was received</p>

### D. Further information

<p>Link to standard form (if applicable)</p>	<p><a href="https://www.bafin.de/EN/Aufsicht/BoersenMaerkte/Transparenz/Informationspflichten_fuer_Emittenten/BedeutendeStimmrechtsanteile/bedeutendestimmrechtsanteile_node_en.html">https://www.bafin.de/EN/Aufsicht/BoersenMaerkte/Transparenz/Informationspflichten_fuer_Emittenten/BedeutendeStimmrechtsanteile/bedeutendestimmrechtsanteile_node_en.html</a></p>
<p>Link to national central storage mechanism for regulated information (OAM)</p>	<p><a href="https://www.unternehmensregister.de/ureg/">https://www.unternehmensregister.de/ureg/</a></p>
<p>Contact details for National Competent Authority if further information is needed</p>	<p><a href="mailto:wa22marktueberwachung@bafin.de">wa22marktueberwachung@bafin.de</a></p>

## Greece

A. General information	
National Competent Authority	Hellenic Capital Market Commission
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 1/3, 50, 2/3 as well as any change equal to or greater than +/- 3% over the 10% threshold
For further information, please refer to	<a href="http://www.hcmc.gr/el/ypochreoseis-diarkous-plerophoreses-tou-ependytikou-koinou">http://www.hcmc.gr/el/ypochreoseis-diarkous-plerophoreses-tou-ependytikou-koinou</a>

B. Filing of a notification					
Standard form	Required (for link please see section D below)				
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / HCMC Circ. 33/2007</li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / HCMC Circ. 33/2007</li> </ul>	<p>Trade date</p> <p>Start of trading of shares</p>				
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / par. 2, art. 14, L.3556/2007</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Three trading days following triggering event				
<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul>	<table border="0" style="width: 100%;"> <tr> <td style="width: 60%;">           Email  <a href="mailto:tr1@cmc.gov.gr">tr1@cmc.gov.gr</a>            Fax (+302103377243)         </td> <td style="width: 40%; border-left: 1px solid black;">           Post (Kolokotroni 1 St., Athens 10562, Greece)         </td> </tr> <tr> <td colspan="2">           No rule         </td> </tr> </table>	Email <a href="mailto:tr1@cmc.gov.gr">tr1@cmc.gov.gr</a> Fax (+302103377243)	Post (Kolokotroni 1 St., Athens 10562, Greece)	No rule	
Email <a href="mailto:tr1@cmc.gov.gr">tr1@cmc.gov.gr</a> Fax (+302103377243)	Post (Kolokotroni 1 St., Athens 10562, Greece)				
No rule					



Notifying the issuer - Permitted channel(s) - Permitted format(s)	No rule No rule
Signature of notification required when notification is submitted	To the NCA: Yes To the issuer: Yes
Intra-day netting <i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i>	Permitted <sup>12</sup>

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / par. 3, art. 14, L.3556/2007	Issuer
Deadline for publication after the date of receipt of notification	Two trading days after the day on which the notification was received

### D. Further information

Link to standard form (if applicable)	<a href="http://www.hcmc.gr/aweb/files/dposlc/files/Form%20for%20notification%20of%20major%20holdings.pdf">http://www.hcmc.gr/aweb/files/dposlc/files/Form%20for%20notification%20of%20major%20holdings.pdf</a>
Link to national central storage mechanism for regulated information (OAM)	<a href="http://www.helex.gr/">http://www.helex.gr/</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:tr1@cmc.gov.gr">tr1@cmc.gov.gr</a>

<sup>12</sup> HCMC Circ. 33/2007

## Hungary

A. General information	
National Competent Authority	The Central Bank of Hungary
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 30, 35, 40, 45, 50, 75, 80, 85, 90, 91, 92, 93, 94, 95, 96, 97, 98, 99
For further information, please refer to	<a href="http://www.mnb.hu">www.mnb.hu</a>

B. Filing of a notification	
Standard form	Required
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Article 61 (1) item a of the Act CXX of 2001 on the Capital Markets, in case of own shares it is the issuer's obligation under Article 61 (2) of the Act CXX of 2001 on the Capital Markets</li> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Article 61 (1) item b of the Act CXX of 2001 on the Capital Markets, in case of own shares it is the issuer's obligation under Article 61 (2) of the Act CXX of 2001 on the Capital Markets</li> </ul>	<p>Trade date</p> <p>Registration of new shares</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Article 61 (1) of the Act CXX of 2001 on the Capital Markets</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Two calendar days following triggering event

Notifying the National Competent Authority <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul>	Digital portal <sup>13</sup> No rule				
Notifying the issuer <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul>	No rule No rule				
Signature of notification required when notification is submitted	<table border="1"> <tr> <td>To the NCA</td> <td>To the issuer</td> </tr> <tr> <td>Yes</td> <td>No</td> </tr> </table>	To the NCA	To the issuer	Yes	No
To the NCA	To the issuer				
Yes	No				
Intra-day netting <i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i>	Permitted				

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / Article 55 (2) of the Act CXX of 2001 on the Capital Markets	Issuer
Deadline for publication after the date of receipt of notification	Two calendar days after the day on which the notification was received

### D. Further information

Link to standard form (if applicable)	Not available <sup>14</sup>
Link to national central storage mechanism for regulated information (OAM)	<a href="https://kozvetetelek.mnb.hu/en">https://kozvetetelek.mnb.hu/en</a>
Contact details for National Competent Authority if further information is needed	Dr. Adrienne László Email: <a href="mailto:laszload@mnb.hu">laszload@mnb.hu</a> Tel.: +36-1-489-9653

<sup>13</sup> Only registered users are provided access to the digital portal. Investors have to nominate a natural person (employee, legal representative etc.) to act on their behalf as administrator of the filing of regulated information to the national competent authority. For more information, please see here: [https://era.mnb.hu/data/cms2421746/Regisztracios\\_folyamat\\_Felhasznaloi\\_Kezikonyv\\_20141124.pdf](https://era.mnb.hu/data/cms2421746/Regisztracios_folyamat_Felhasznaloi_Kezikonyv_20141124.pdf).

<sup>14</sup> The link to the standard form is available only to registered users of the digital portal.

## Iceland

A. General information	
National Competent Authority	Central Bank of Iceland
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 30, 35, 40, 50, 2/3, 90
For further information, please refer to	<a href="https://en.fme.is/">https://en.fme.is/</a>

B. Filing of a notification	
Standard form	Required (for link please see section D below)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Article 12(1) of Act No. 20/2021 on transparency of issuers and major holding notifications</li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Article 12(2) of Act No. 20/2021 on transparency of issuers and major holding notifications</li> </ul>	<p>Trade date</p> <p>Publication of the results of the share capital increase</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Article 21 of Act No. 20/2021 on transparency of issuers and major holding notifications</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Four trading days following triggering event
<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul>	<p>Email (<a href="mailto:sedlabanki@sedlabanki.is">sedlabanki@sedlabanki.is</a>)</p> <p>No rule</p>

Notifying the issuer - Permitted channel(s) - Permitted format(s)	No rule No rule
Signature of notification required when notification is submitted	To the NCA: Yes To the issuer: Yes
Intra-day netting <i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i>	Permitted

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / Article 22 of Act No. 20/2021 on transparency of issuers and major holding notifications	Issuer
Deadline for publication after the date of receipt of notification	Three trading days after the day on which the notification was received

### D. Further information

Link to standard form (if applicable)	<a href="https://en.fme.is/supervision/oam/">https://en.fme.is/supervision/oam/</a>
Link to national central storage mechanism for regulated information (OAM)	<a href="http://www.oam.is">www.oam.is</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:sedlabanki@sedlabanki.is">sedlabanki@sedlabanki.is</a> <a href="mailto:financial.supervision@cb.is">financial.supervision@cb.is</a>

## Ireland

A. General information	
National Competent Authority	Central Bank of Ireland
Applicable national notification thresholds (percentages)	For closed-ended collective investment schemes and non-Irish issuers: 5, 10, 15, 20, 25, 30, 50, 75 For all other issuers: 3% and each 1% thereafter up to 100%
For further information, please refer to	<a href="http://www.centralbank.ie/regulation/securities-markets/transparency/Pages/default.aspx">http://www.centralbank.ie/regulation/securities-markets/transparency/Pages/default.aspx</a>

B. Filing of a notification	
Standard form	Required (for link please see section D below)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / See also Part 5 of the Transparency Directive (2004/109/EC) Regulations 2007 as amended (the “Regulations”), and Part 7 of the Central Bank of Ireland’s Transparency Rules <i>On-exchange transactions are transactions which are carried out on a regulated market.</i></li> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / See also Part 5 of the Regulations, and guidance provided in Form TR1 (for link please see section D below)</li> <li>- Deadline for publication under TD Art. 15</li> </ul>	<p>Trade date</p> <p>Publication under TD Art. 15 / See also Regulation 20 of the Regulations</p> <p>End of month</p>

<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / See also Part 5 of the Regulations, and Part 7 of the Central Bank of Ireland's Transparency Rules</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	<p>For closed-ended collective investment schemes and non-Irish issuers: Six trading days following triggering event</p> <p>For all other issuers: Four trading days following triggering event</p>		
<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Signature of notification required when notification is submitted</p>	<p>Email (<a href="mailto:tr1shareholder@corporatefinance-cbi.ie">tr1shareholder@corporatefinance-cbi.ie</a> / <a href="mailto:tr1issuer@corporatefinance-cbi.ie">tr1issuer@corporatefinance-cbi.ie</a> as applicable)</p> <p>No rule</p> <p>No rule</p> <p>No rule</p> <table border="1" data-bbox="767 1032 1393 1122"> <tr> <td>To the NCA: No</td> <td>To the issuer: No</td> </tr> </table>	To the NCA: No	To the issuer: No
To the NCA: No	To the issuer: No		
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	<p>Permitted (see also Part 7 of the Central Bank of Ireland's Transparency Rules)</p>		

### C. Publication of a notification

<p>Entity responsible for publishing notifications under TD Art. 12 / See also Part 5 of the Regulations, and Part 7 of the Central Bank of Ireland's Transparency Rules</p>	<p>Issuer</p>
<p>Deadline for publication after the date of receipt of notification</p>	<p>For closed-ended collective investment schemes and non-Irish issuers: Three trading days after the day on which the notification was received</p> <p>For all other issuers: Trading day after the day on which the notification was received</p>

D. Further information	
Link to standard form (if applicable)	<a href="http://www.centralbank.ie/regulation/securities-markets/transparency/Pages/forms.aspx">http://www.centralbank.ie/regulation/securities-markets/transparency/Pages/forms.aspx</a>
Link to national central storage mechanism for regulated information (OAM)	<a href="http://www.ise.ie/Market-Data-Announcements/Announcements/">http://www.ise.ie/Market-Data-Announcements/Announcements/</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:regulateddisclosures@centralbank.ie">regulateddisclosures@centralbank.ie</a>



## Italy

### A. General information

National Competent Authority	Commissione Nazionale per le Società e la Borsa (Consob)
Applicable national notification thresholds (percentages)	3 <sup>15</sup> , 5, 10 <sup>16</sup> , 15, 20 <sup>21</sup> , 25 <sup>21</sup> , 30, 50, 2/3, 90
For further information, please refer to	<a href="http://www.consob.it/mainen/documenti/english/laws/reg11971e.htm#Article_117">http://www.consob.it/mainen/documenti/english/laws/reg11971e.htm#Article_117</a>

### B. Filing of a notification

Standard form	Required (for link please see section D below)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Art. 121, paragraph 1, of the Issuers' Regulation no. 11971 of 14 May 1999</li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Articles 121, paragraph 1, and 117, paragraph 2, of the Issuers' Regulation no. 11971 of 14 May 1999</li> <li>- Deadline for publication under TD Art. 15</li> </ul>	<p>Trade date</p> <p>Publication under TD Art. 15<sup>17</sup> / Art. 85-bis, paragraphs 1 and 2, of the Issuers' Regulation no. 11971 of 14 May 1999</p> <p>Day after deposit to the public register (except specific cases<sup>18</sup>)</p>

<sup>15</sup> This threshold is only applicable to non-SME companies.

<sup>16</sup> A declaration of intent, i.e. a statement of investment objectives, will be required when the 10%, 20%, and 25% threshold is exceeded.

<sup>17</sup> Please take note that in the standard form, as "trade date", the investor must indicate the date of the deposit to the public register.

<sup>18</sup> The publication is made within five days of registration with the public register in the following cases: a) resolution for a share capital increase on a free basis b) reduction of capital due to losses and c) resolutions passed by the general and special shareholders' meetings, which order the mandatory conversions of shares of a category of shares to another category. In addition, in case of increased voting rights or multiple-voting shares the total amount of the voting rights is communicated to the public by the issuer within the fifth trading day from the end of each calendar month during which an increase of a decrease of such an amount has occurred. For the relevant rule, please see:

[http://www.consob.it/mainen/documenti/english/laws/reg11971e.htm#Article\\_85-bis](http://www.consob.it/mainen/documenti/english/laws/reg11971e.htm#Article_85-bis)

<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Article 121, paragraphs 1 and 1-ter, of the Issuers' Regulation no. 11971 of 14 May 1999</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Five trading days following triggering event		
<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Signature of notification required when notification is submitted</p>	<table border="0"> <tr> <td> <p>Certified email (<a href="mailto:consob@pec.consob.it">consob@pec.consob.it</a>)</p> <p>Email with electronic signature (<a href="mailto:protocollo@consob.it">protocollo@consob.it</a>)</p> <p>Word</p> <p>No rule</p> <p>No rule</p> <p>To the NCA: Yes</p> </td> <td> <p>Digital portal<sup>19</sup> (<a href="https://www.consob.it/partril-web/">https://www.consob.it/partril-web/</a>)</p> <p>Post (Via G. B. Martini, 3, 00198 Rome, Italy<sup>20</sup>)</p> <p>Readable PDF</p> <p>To the issuer: No rule</p> </td> </tr> </table>	<p>Certified email (<a href="mailto:consob@pec.consob.it">consob@pec.consob.it</a>)</p> <p>Email with electronic signature (<a href="mailto:protocollo@consob.it">protocollo@consob.it</a>)</p> <p>Word</p> <p>No rule</p> <p>No rule</p> <p>To the NCA: Yes</p>	<p>Digital portal<sup>19</sup> (<a href="https://www.consob.it/partril-web/">https://www.consob.it/partril-web/</a>)</p> <p>Post (Via G. B. Martini, 3, 00198 Rome, Italy<sup>20</sup>)</p> <p>Readable PDF</p> <p>To the issuer: No rule</p>
<p>Certified email (<a href="mailto:consob@pec.consob.it">consob@pec.consob.it</a>)</p> <p>Email with electronic signature (<a href="mailto:protocollo@consob.it">protocollo@consob.it</a>)</p> <p>Word</p> <p>No rule</p> <p>No rule</p> <p>To the NCA: Yes</p>	<p>Digital portal<sup>19</sup> (<a href="https://www.consob.it/partril-web/">https://www.consob.it/partril-web/</a>)</p> <p>Post (Via G. B. Martini, 3, 00198 Rome, Italy<sup>20</sup>)</p> <p>Readable PDF</p> <p>To the issuer: No rule</p>		
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	<p>Permitted</p> <p>In the event of several transactions carried out on the same trading day, the holding to be considered for the purpose of acquitting the obligations shall be that emerging from the last transaction carried out (Art. 118, paragraph 6, of the Issuers' Regulation no. 11971 of 14 May 1999)</p>		

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / Art. 122, of the Issuers' Regulation no. 11971 of 14 May 1999	National Competent Authority
Deadline for publication after the date of receipt of notification	Three trading days after the day on which the notification was received

<sup>19</sup> The digital portal is used only by issuers for the disclosure of their holdings.

<sup>20</sup> The notification may be forwarded in advance by e-mail to [vigilanzaopaesasseti@consob.it](mailto:vigilanzaopaesasseti@consob.it) or by fax to the number +39 06 8477519.

#### D. Further information

Link to standard form (if applicable)	<a href="http://www.consob.it/documenti/english/laws/annex4_reg11971e.pdf?lang=en">http://www.consob.it/documenti/english/laws/annex4_reg11971e.pdf?lang=en</a>
Link to national central storage mechanism for regulated information (OAM)	<a href="http://www.1info.it/PORTALEONEINFO/">http://www.1info.it/PORTALEONEINFO/</a> <a href="http://www.emarketstorage.com/home/homepage.htm">http://www.emarketstorage.com/home/homepage.htm</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:vigilanzaopaeasseti@consob.it">vigilanzaopaeasseti@consob.it</a>

## Latvia

A. General information	
National Competent Authority	Financial and Capital Market Commission
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 30, 50, 75, 90
For further information, please refer to	<a href="http://www.fktk.lv">www.fktk.lv</a>

B. Filing of a notification	
Standard form	Required (for link please see section D below)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Law on the Financial Instruments Market, Article 61, Article 61.<sup>2</sup>, Article 61.<sup>3</sup> (1)</li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Law on the Financial Instruments Market, Article 61, Article 61.<sup>1</sup> (1) and (9), Article 61.<sup>3</sup> (1)</li> </ul>	<p>Settlement date</p> <p>Registration of new shares</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Law on the Financial Instruments Market, Article 61.<sup>3</sup> (1) and Article 61.<sup>3</sup> (2)</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Four trading days following triggering event

Notifying the National Competent Authority - Permitted channel(s) - Permitted format(s)	Email ( <a href="mailto:fktk@fktk.lv">fktk@fktk.lv</a> ) No rule	Post (Kungu iela 1, Riga, Latvia, LV-1050)
Notifying the issuer - Permitted channel(s) - Permitted format(s)	Email No rule	Post
Signature of notification required when notification is submitted	To the NCA: Yes	To the issuer: Yes
Intra-day netting <i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i>	Not permitted	

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / Law on the Financial Instruments Market, Article 61.3 (3)	Issuer
Deadline for publication after the date of receipt of notification	On the trading day after the day on which the notification was received

### D. Further information

Link to standard form (if applicable)	<a href="#">Normatīvie noteikumi par Finanšu instrumentu tirgus likumā noteiktās paziņojumiem par nozīmīgas līdzdalības iegūšanu vai zaudēšanu izmantojamās veidlapas apstiprināšanu (likumi.lv)</a> (in Latvian)
Link to national central storage mechanism for regulated information (OAM)	<a href="https://csri.investinfo.lv/">https://csri.investinfo.lv/</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:Zane.Medne@bank.lv">Zane.Medne@bank.lv</a> <a href="mailto:Gunta.Ilenane@bank.lv">Gunta.Ilenane@bank.lv</a>

## Lithuania

### A. General information

National Competent Authority	Bank of Lithuania
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 30, 50, 75, 95
For further information, please refer to	<a href="https://www.lb.lt/en/fs-issuers">https://www.lb.lt/en/fs-issuers</a> (information in Lithuanian)

### B. Filing of a notification

Standard form	Required (for link please see section D below)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Art. 15 (1)(2) and Art. 18 of The Law on Securities<sup>21</sup></li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / See the reference to the Law above<sup>22</sup></li> </ul>	<p>Trade date</p> <p>Registration of new shares</p>

<sup>21</sup><https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/TAIS.291834/asr>

<sup>22</sup> There are no particular provisions in the law on the triggering event for passive crossings. Common market practice and recommendations of the National Competent Authority are used in this case.

<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Art. 15 (1) of the Law on Securities<sup>23</sup> and part 26 of the rules on information disclosure<sup>24</sup></p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	<p>Six trading days following triggering event</p>	
<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Signature of notification required when notification is submitted</p>	<p>Email (prieziura@lb.lt) or documents by post</p> <p>Scanned document, readable PDF (documents signed with an electronic signature)</p> <p>Email</p> <p>Word</p> <p>To the NCA: Yes</p>	<p>Post (Bank of Lithuania, Zalgirio str. 90, LT-09303)</p> <p>Scanned document, readable PDF (documents signed with an electronic signature or originals with a signature in Word)</p> <p>Post</p> <p>Readable PDF</p> <p>To the issuer: Yes</p>
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	<p>Permitted</p>	

### C. Publication of a notification

<p>Entity responsible for publishing notifications under TD Art. 12 / Art. 15(9) of the Law on Securities<sup>25</sup></p>	<p>Issuer</p>
<p>Deadline for publication after the date of receipt of notification</p>	<p>Three trading days after the day on which the notification was received</p>

<sup>23</sup> <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/11ef1d803cfb11e68f278e2f1841c088?jfwid=5sjolfxzh>

<sup>24</sup> <https://www.e-tar.lt/portal/lt/legalAct/94a4aec0875511e7a3c4a5eb10f04386/asr>

<sup>25</sup> <https://e-seimas.lrs.lt/portal/legalAct/lt/TAD/11ef1d803cfb11e68f278e2f1841c088?jfwid=5sjolfxzh>

#### D. Further information

Link to standard form (if applicable)	<a href="https://www.lb.lt/en/reporting-forms-8">https://www.lb.lt/en/reporting-forms-8</a>
Link to national central storage mechanism for regulated information (OAM)	<a href="http://www.crib.lt/">http://www.crib.lt/</a>
Contact details for National Competent Authority if further information is needed	Aurelija Gasiuniene Email: <a href="mailto:agasiuniene@lb.lt">agasiuniene@lb.lt</a>



## Luxembourg

A. General information	
National Competent Authority	Commission de Surveillance du Secteur Financier (CSSF)
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 1/3, 50, 2/3
For further information, please refer to	<a href="https://www.cssf.lu/en/information-requirements-issuers-of-securities/">https://www.cssf.lu/en/information-requirements-issuers-of-securities/</a>

B. Filing of a notification	
Standard form	Required
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / TL<sup>26</sup> Art. 8(1)</li> <li style="padding-left: 20px;"><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></li> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / TL Art. 8(2)</li> <li>- Deadline for publication under TD Art. 15</li> </ul>	<p>Trade date</p> <p>Publication under TD Art. 15 / TL Art. 14</p> <p>End of month</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / TL Art. 11(2) and TR<sup>27</sup> Art. 10</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	<p>Six trading days following triggering event</p>

<sup>26</sup> Law of 11 January 2008 on transparency requirements for issuers ("TL").

<sup>27</sup> Grand-ducal regulation of 11 January 2008 on transparency requirements for issuers of securities ("TR").

<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul>	<p>eRIIS (CSSF online portal) eRIIS form HOS-1 Major holding notification</p>
<p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul>	<p>No rule eRIIS form HOS-1 Major holding notification (PDF format)</p>
<p>Signature of notification required when notification is submitted</p>	<p>To the NCA: No      To the issuer: No</p>
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	<p>Permitted, provided that the voting rights are not exercised</p>

### C. Publication of a notification

<p>Entity responsible for publishing notifications under TD Art. 12 / TL Art. 11</p>	<p>Issuer</p>
<p>Deadline for publication after the date of receipt of notification</p>	<p>Three trading days after the day on which the notification was received</p>

### D. Further information

<p>Link to standard form (if applicable)</p>	<p>The standard form HOS-1 is only accessible through our online portal eRIIS (further details may be found at <a href="https://www.cssf.lu/en/eriis/">https://www.cssf.lu/en/eriis/</a>)</p>
<p>Link to national central storage mechanism for regulated information (OAM)</p>	<p><a href="https://bourse.lu/oam">https://bourse.lu/oam</a></p>
<p>Contact details for National Competent Authority if further information is needed</p>	<p><a href="mailto:transparency@cssf.lu">transparency@cssf.lu</a></p>

## Malta

A. General information	
National Competent Authority	Malta Financial Services Authority
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 30, 50, 75, 90
For further information, please refer to	<a href="https://www.mfsa.mt/wp-content/uploads/2021/12/Full-Capital-Markets-Rules-as-amended-on-6-December-2021.pdf">https://www.mfsa.mt/wp-content/uploads/2021/12/Full-Capital-Markets-Rules-as-amended-on-6-December-2021.pdf</a>

B. Filing of a notification	
Standard form	No standard form (Whilst shareholders are not required to file the notification using a standard form, they are highly encouraged to use ESMA's standard notification form for this purpose. ESMA's standard form for notification of major holdings is available on the Authority's website, as outlined in Section D below. Regardless of the form used, notifications shall include all the information as required in terms of the Capital Markets Rules transposing the TD provisions.
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Capital Markets Rule 5.176 <i>On-exchange transactions are transactions which are carried out on a regulated market.</i></li> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Capital Markets Rule 5.179</li> </ul>	<p>Settlement date</p> <p>Publication of the results of the share capital increase</p>

<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Capital Markets Rule 15.193</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Four trading days following triggering event										
<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> </ul> <p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Signature of notification required when notification is submitted</p>	<table border="1"> <tr> <td>Email (<a href="mailto:transparency@mfsa.mt">transparency@mfsa.mt</a>)</td> <td>Post (Malta Financial Services Authority, Triq l-Imdina, Zone 1, Central Business District, Birkirkara, CBD 1010, Malta)</td> </tr> <tr> <td>No rule</td> <td></td> </tr> <tr> <td>No rule</td> <td></td> </tr> <tr> <td>No rule</td> <td></td> </tr> <tr> <td>To the NCA: Yes</td> <td>To the issuer: Yes</td> </tr> </table>	Email ( <a href="mailto:transparency@mfsa.mt">transparency@mfsa.mt</a> )	Post (Malta Financial Services Authority, Triq l-Imdina, Zone 1, Central Business District, Birkirkara, CBD 1010, Malta)	No rule		No rule		No rule		To the NCA: Yes	To the issuer: Yes
Email ( <a href="mailto:transparency@mfsa.mt">transparency@mfsa.mt</a> )	Post (Malta Financial Services Authority, Triq l-Imdina, Zone 1, Central Business District, Birkirkara, CBD 1010, Malta)										
No rule											
No rule											
No rule											
To the NCA: Yes	To the issuer: Yes										
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	Not permitted										

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / Capital Markets Rule 5.16.8 / 5.193 / 5.197	Issuer
Deadline for publication after the date of receipt of notification	Three trading days after the day on which the notification was received

### D. Further information

Link to standard form (if applicable)	The recommended ESMA notification can be found at: <a href="https://www.mfsa.mt/our-work/capital-markets-supervision/">https://www.mfsa.mt/our-work/capital-markets-supervision/</a> (Listed Entities > Continuing Obligations > ESMA Documents)
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Link to national central storage mechanism for regulated information (OAM)	<a href="https://www.borzamalta.com.mt/officially-appointed-mechanism">https://www.borzamalta.com.mt/officially-appointed-mechanism</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:CapitalMarkets@mfsa.mt">CapitalMarkets@mfsa.mt</a>

## Netherlands

A. General information	
National Competent Authority	Stichting Autoriteit Financiële Markten (AFM)
Applicable national notification thresholds (percentages)	3, 5, 10, 15, 20, 25, 30, 40, 50, 60, 75, 95
For further information, please refer to	<a href="https://www.afm.nl/en/professionals/doelgroep/en/effectenuitgevende-ondernemingen/meldingen/substantieel">https://www.afm.nl/en/professionals/doelgroep/en/effectenuitgevende-ondernemingen/meldingen/substantieel</a>

B. Filing of a notification	
Standard form	Required (for link please see section D below)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / 5:38 The Financial Supervision Act (Wft)</li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / 5:39 The Financial Supervision Act (Wft)</li> <li>- Deadline for publication under TD Art. 15</li> </ul>	<p>Trade date</p> <p>Publication under TD Art. 15 / 5:34 The Financial Supervision Act (Wft)</p> <p>Increases or decreases larger than 1% must be notified forthwith while smaller changes must be notified on a quarterly basis</p>
Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / 5:38 The Financial Supervision Act (Wft)	Without delay <sup>28</sup>

<sup>28</sup> A person is obliged to notify without delay once it has reached, exceeded or fallen below a threshold. "Without delay" means that the time between the moment a person becomes, or should have become, aware of reaching, exceeding or falling below a threshold, or aware of the acquisition or loss of the disposal of one or more shares with a special right under the articles of association regarding control, and the moment the AFM receives the notification, must be as short as possible given the circumstances. According to Dutch legal provisions, one should have become aware of a triggering event within two working days.

<i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i>	
<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Signature of notification required when notification is submitted</p>	<p>Digital portal (<a href="https://www.loket.afm.nl/loket/en-GB/default2.aspx">https://www.loket.afm.nl/loket/en-GB/default2.aspx</a>)</p> <p>HTML</p> <p>No rule</p> <p>No rule</p> <p>To the NCA: No      To the issuer: No</p>
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	Permitted

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / 5:49 The Financial Supervision Act (Wft)	National Competent Authority
Deadline for publication after the date of receipt of notification	On the trading day after the day on which the notification was received by the NCA

### D. Further information

Link to standard form (if applicable)	<a href="https://www.loket.afm.nl/loket/en-GB/default2.aspx">https://www.loket.afm.nl/loket/en-GB/default2.aspx</a>
Link to national central storage mechanism for regulated information (OAM)	<a href="https://www.afm.nl/en/professionals/registers/alle-huidige-registers.aspx">https://www.afm.nl/en/professionals/registers/alle-huidige-registers.aspx</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:melden@afm.nl">melden@afm.nl</a>

## Norway

A. General information	
National Competent Authority	The Financial Supervisory Authority of Norway  Notifications are received by the Oslo Stock Exchange Euronext by delegation of this task.
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 1/3, 50, 2/3, 90
For further information, please refer to	Oslo Stock Exchange Euronext <a href="https://www.euronext.com/en/markets/oslo">https://www.euronext.com/en/markets/oslo</a> Finanstilsynet <a href="http://www.finanstilsynet.no">www.finanstilsynet.no</a>
B. Filing of a notification	
Standard form	No standard form.  Mandatory requirements regarding the content of notifications follow from the Securities Trading Regulation (STR) section 4-1.
Triggering event <i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i>  <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / NSTA, section 4-3 (6) <i>On-exchange transactions are transactions which are carried out on a regulated market.</i></li> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / NSTA, section 4-3 (6)</li> </ul>	The entering into of the agreement on acquisition or disposal, or when the shareholder learns or should have learned about this.  Registration of the new shares, or when the shareholder learns or should have learned about this.
Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / NSTA, section 4-3 (6) <i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i>	Immediately after the transaction which crosses the threshold is done. In cases where the crossing is done by a group which holds shares across different entities and different time zones, or an asset manager which carry out asset management for different funds across different time zones, this may be taken into consideration when deciding the deadline. However, such groups or managers must have routines in place making it possible to notify the market quickly. In any case the final deadline is before opening of the market the



	second day after the trade which leads to the crossing of the threshold.
<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Signature of notification required when notification is submitted</p>	<p>Email <a href="mailto:ma@oslobors.no">ma@oslobors.no</a>   Fax (+4722416590)</p> <p>No rule, but mandatory requirements regarding the content of notifications derive from the Securities Trading Regulation (STR), section 4-1.</p> <p>No rule, but mandatory requirements regarding the content of notifications derive from the Securities Trading Regulation (STR), section 4-1</p> <p>No mandatory form, but mandatory requirements regarding the content of notifications derive from the Securities Trading Regulation (STR), section 4-1.</p> <p>To the NCA: No   To the issuer: No</p>
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	Not permitted

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / NSTA, section 4-3 subsection (1) and Regulations on the submission of disclosure notification etc., of 6 December 2007 no 1359 section 1	The regulated market on which the shares are admitted to trading - Oslo Stock Exchange Euronext
Deadline for publication after the date of receipt of notification	Notification must be published in an effective and non-discriminating manner; no deadline in terms of days has been defined

### D. Further information

Link to standard form (if applicable)	Not applicable
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Link to national central storage mechanism for regulated information (OAM)	<a href="https://newsweb.oslobors.no/">https://newsweb.oslobors.no/</a>
Contact details for National Competent Authority if further information is needed	Finanstilsynet +4722939800 <a href="mailto:post@finansstilsynet.no">post@finansstilsynet.no</a>  Erik Landa <a href="mailto:erla@finansstilsynet.no">erla@finansstilsynet.no</a>  Anne Simonine Egeland <a href="mailto:ase@finansstilsynet.no">ase@finansstilsynet.no</a>

## Poland

A. General information	
National Competent Authority	Polish Financial Supervision Authority (KNF)
Applicable national notification thresholds (percentages)	5, 10 <sup>29</sup> , 15, 20, 25, 33 <sup>30</sup> , 1/3, 50, 75, 90
For further information, please refer to	<a href="http://www.knf.gov.pl">http://www.knf.gov.pl</a>

B. Filing of a notification	
Standard form	No standard form (There is no obligation to use a standard form for major holdings notifications. All legal requirements are contained in the Art. 69. 4. of the Act of 29 July 2005 <sup>31</sup> )
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Art. 69. 1 Act of 29 July 2005 <i>On-exchange transactions are transactions which are carried out on a regulated market.</i></li> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Art. 69. 1 Act of 29 July 2005</li> </ul>	<p>Trade date</p> <p>Registration of new shares</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Art. 69. 1 Act of 29 July 2005</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Six trading days following triggering event for on-exchange transactions and four working days for off-exchange transactions

<sup>29</sup> Shareholders who have crossed the 10% threshold are required to notify any increase or decrease in their holdings which is equal to or greater than a) 2% in case of companies admitted to trading on the official listing of the regulated markets; and b) 5% in case of companies admitted to trading other market segments of the regulated market or admitted to trading on an MTF.

<sup>30</sup> Shareholders who have crossed the 33% threshold are required to notify any increase or decrease in their holdings which is equal to or greater than 1%.

<sup>31</sup> Act of 29 July 2005 on Public Offering, Conditions Governing the Introduction of Financial Instruments to Organised Trading, and Public Companies

<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> </ul>	<p>Electronic portal: www.epuap.gov.pl<sup>32</sup></p> <p>Email<sup>33</sup> (<a href="mailto:znacznepakiety@knf.gov.pl">znacznepakiety@knf.gov.pl</a>)</p> <p>Fax (0048222625532)</p>	<p>Post (Komisja Nadzoru Finansowego, ul. Piękna 20, 00-549 Warszawa)</p>
<ul style="list-style-type: none"> <li>- Permitted format(s)</li> </ul>	No rule	
<p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul>	No rule	
<p>Signature of notification required when notification is submitted</p>	To the NCA: Yes	To the issuer: Yes
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	Permitted	

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / Art. 70 p. 1 Act of 29 July 2005	Issuer
Deadline for publication after the date of receipt of notification	On the day on which the notification was received

### D. Further information

Link to standard form (if applicable)	Not applicable
Link to national central storage mechanism for regulated information (OAM)	<a href="https://moam.knf.gov.pl/moam.nsf">https://moam.knf.gov.pl/moam.nsf</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:dio@knf.gov.pl">dio@knf.gov.pl</a>

<sup>32</sup> KNF Electronic inbox: /2447pvjake/SkrytkaESP.

<sup>33</sup> Additional channel to be used only in case of emergency or risk of postal delay.

## Portugal

A. General information	
National Competent Authority	Comissão do Mercado de Valores Mobiliários
Applicable national notification thresholds <sup>34</sup> (percentages)	5, 10, 15, 20, 25, 1/3, 50, 2/3, 90
For further information, please refer to	<a href="https://www.cmvm.pt/en/Legislacao/National_Legislation/Securities%20Code/Documents/EN%20CdVM_20220228.clean.pdf">https://www.cmvm.pt/en/Legislacao/National_Legislation/Securities%20Code/Documents/EN%20CdVM_20220228.clean.pdf</a>
B. Filing of a notification	
Standard form	Optional (The use of the ESMA Standard Form is recommended, for link please see section D below)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Art 16/1 Portuguese Securities Code</li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Art 16/1 Portuguese Securities Code</li> </ul>	<p>Trade date</p> <p>Registration of new shares</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Art. 16/1 and 16/3 Portuguese Securities Code</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Six trading days following triggering event

<sup>34</sup> Some of these thresholds are also applicable to "sociedades abertas" which are issuers considered public companies in Portugal but whose shares are not admitted to trading on a regulated market. The obligation to notify major holdings in "sociedades abertas" only applies until 31/12/2022 (as from that date the concept "sociedades abertas" will be suppressed from Portuguese law).

<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul>	<p>Email (<a href="mailto:cmvm@cmvm.pt">cmvm@cmvm.pt</a>)</p> <p>Fax (+35121353077/8)</p> <p>Word</p> <p>Excel</p>	<p>Post (r. Laura Alves, nº 4 - Apartado 14258 1064-003 Lisboa)</p> <p>Readable PDF</p>
<p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul>	<p>Email</p> <p>Fax</p> <p>Word</p> <p>Excel</p>	<p>Post</p> <p>Readable PDF</p>
<p>Signature of notification required when notification is submitted</p>	<p>To the NCA: No</p>	<p>To the issuer: No</p>
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	<p>Permitted</p>	

### C. Publication of a notification

<p>Entity responsible for publishing notifications under TD Art. 12 / Art 17 Portuguese Securities Code</p>	<p>Issuer</p>
<p>Deadline for publication after the date of receipt of notification</p>	<p>Three trading days after the day on which the notification was received</p>

### D. Further information

<p>Link to standard form (if applicable)</p>	<p><a href="http://web3.cmvm.pt/SDI/emitentes/FORM_PQ_esma-2015-1597.pdf">http://web3.cmvm.pt/SDI/emitentes/FORM_PQ_esma-2015-1597.pdf</a></p>
<p>Link to national central storage mechanism for regulated information (OAM)</p>	<p><a href="http://web3.cmvm.pt/english/sdi/emitentes/info_priv.cfm">http://web3.cmvm.pt/english/sdi/emitentes/info_priv.cfm</a></p>
<p>Contact details for National Competent Authority if further information is needed</p>	<p><a href="mailto:transparency@cmvm.pt">transparency@cmvm.pt</a></p>



instruments and market operations as amended,							
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Art. 74 paragraph (2) of Law no. 24/2017 on issuers of financial instruments and market operations as amended, Art. 137 of ASF Regulation no. 5/2018 on issuers of financial instruments and market operations, with subsequent modifications and Art. 5 of ASF Regulation no. 4/2013 regarding the underlying shares for the certificates of deposit, with subsequent modifications</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Four trading days following triggering event						
<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Signature of notification required when notification is submitted</p>	<p>No rule</p> <p>No rule</p> <table border="0"> <tr> <td>Email (with incorporated extended electronic signature)</td> <td>Post</td> </tr> <tr> <td>Fax</td> <td></td> </tr> <tr> <td>No rule</td> <td></td> </tr> </table> <p>To the NCA: Yes      To the issuer: Yes</p>	Email (with incorporated extended electronic signature)	Post	Fax		No rule	
Email (with incorporated extended electronic signature)	Post						
Fax							
No rule							
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	Permitted						

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / Art. 74 paragraph (6) of Law no. 24/2017 on	Issuer <sup>36</sup>
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<sup>36</sup> The notification is also published by the regulated market as the issuer is required to file it with the regulated market as well.



issuers of financial instruments as amended, and market operations and Art. 5 of the ASF Regulation no. 4/2013 regarding the underlying shares for the certificates of deposit, with subsequent modifications	
Deadline for publication after the date of receipt of notification	Three trading days after the day on which the notification was received

#### D. Further information

Link to standard form (if applicable)	<a href="https://www.asfromania.ro/uploads/articole/attachments/628b7a455c0ae835801983.pdf">https://www.asfromania.ro/uploads/articole/attachments/628b7a455c0ae835801983.pdf</a>
Link to national central storage mechanism for regulated information (OAM)	<a href="https://oam.asfromania.ro/oam/loadedPDFReportsForPublic.jsp">https://oam.asfromania.ro/oam/loadedPDFReportsForPublic.jsp</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:reglementari.siif@asfromania.ro">reglementari.siif@asfromania.ro</a>

## Slovakia

A. General information	
National Competent Authority	National Bank of Slovakia
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 30, 50, 75
For further information, please refer to	<a href="http://www.nbs.sk/en/financial-market-supervision1/supervision/securities-market">http://www.nbs.sk/en/financial-market-supervision1/supervision/securities-market</a>
B. Filing of a notification	
Standard form	Recommended (applicable from 1 January 2017)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Art. 7(8,9), Art. 13 of the Securities and Investment Services Act No. 566/2001 Coll. <i>On-exchange transactions are transactions which are carried out on a regulated market.</i></li> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Art. 202 (4), Art. 213 (7), Art. 216 (1) of the Commercial Code</li> </ul>	<p>Settlement date</p> <p>Registration of new shares</p>
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Art. 41 (11) and Art. 41 (12) of the Act No. 429/2002 Coll. on Stock Exchange</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Six trading days following triggering event

<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> </ul>	<p>Fax (+421257871116)</p> <p>Email (<a href="mailto:oznamovanie.podielov@nbs.sk">oznamovanie.podielov@nbs.sk</a>)</p>	<p>Post (Národná banka Slovenska, Imricha Karvaša 1813 25 Bratislava, Slovak Republic)</p>
<ul style="list-style-type: none"> <li>- Permitted format(s)</li> </ul>	No rule	
<p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul>	No rule	
<p>Signature of notification required when notification is submitted</p>	To the NCA: Yes	To the issuer: Yes
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	Not permitted	

### C. Publication of a notification

<p>Entity responsible for publishing notifications under TD Art. 12 / Art. 42 (11) of the Act. No. 429/2002 Coll. on Stock Exchange</p>	Issuer <sup>37</sup>
<p>Deadline for publication after the date of receipt of notification</p>	Three trading days after the day on which the notification was received

### D. Further information

<p>Link to standard form (if applicable)</p>	<p><a href="http://www.nbs.sk/en/financial-market-supervision1/supervision/securities-market/issuers-of-securities-basic-information">http://www.nbs.sk/en/financial-market-supervision1/supervision/securities-market/issuers-of-securities-basic-information</a></p>
<p>Link to national central storage mechanism for regulated information (OAM)</p>	<p><a href="https://ceri.nbs.sk/">https://ceri.nbs.sk/</a></p>

<sup>37</sup> According to the Art. 42 (12) of the Act. No. 429/2002 Coll. on Stock Exchange where the National Bank of Slovakia discloses the information referred to in Article 41(13) no later than three trading days after receiving the notification, and provided that conditions set out in Article 47 are met, the issuer shall be exempted from the obligation under Article 41(11) to disclose the information.



Contact details for National Competent Authority if further information is needed

Národná banka Slovenska, Imricha Karvaša 1,  
813 25 Bratislava, Slovak Republic,  
[info@nbs.sk](mailto:info@nbs.sk)

## Slovenia

A. General information	
National Competent Authority	Securities Market Agency (SMA)
Applicable national notification thresholds (percentages)	5, 10, 15, 20, 25, 1/3, 50, 75
For further information, please refer to	<a href="#">ZTFI-1-npb1_ANG_2020_web.pdf (a-tvp.si)</a> Financial Instruments Market Act (ZTFI-1)

B. Filing of a notification							
Standard form	Required (for link please see section D below)						
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / ZTFI Art. 118/1/1<sup>38</sup></li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / ZTFI Art. 118/1/2<sup>39</sup></li> </ul>	<p>Trade date</p> <p>Registration of new shares</p>						
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / ZTFI Art. 123/2</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	Four trading days following triggering event						
<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> </ul>	<table border="0"> <tr> <td>Email</td> <td>Post</td> </tr> <tr> <td><a href="mailto:info@atvp.si">info@atvp.si</a></td> <td>Securities Market Agency,</td> </tr> <tr> <td>Fax</td> <td></td> </tr> </table>	Email	Post	<a href="mailto:info@atvp.si">info@atvp.si</a>	Securities Market Agency,	Fax	
Email	Post						
<a href="mailto:info@atvp.si">info@atvp.si</a>	Securities Market Agency,						
Fax							

<sup>38</sup> More specific rules are set out in by-laws which are not translated to English.

<sup>39</sup> More specific rules are set out in by-laws which are not translated to English.

	+386 (0)1 280 04 30	Poljanski nasip 6, 1000 Ljubljana, Slovenia
- Permitted format(s)	No rule	
Notifying the issuer		
- Permitted channel(s)	No rule	
- Permitted format(s)	No rule	
Signature of notification required when notification is submitted	To the NCA: Yes	To the issuer: Yes
Intra-day netting <i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i>	Permitted	

### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / ZTFI Art. 124/1	Issuer
Deadline for publication after the date of receipt of notification	Three trading days after the day on which the notification was received

### D. Further information

Link to standard form (if applicable)	<a href="https://www.atvp.si/storage/app/media/Documents/obrazci/ZTFI-1/Obrazec_P_DEL.pdf">https://www.atvp.si/storage/app/media/Documents/obrazci/ZTFI-1/Obrazec_P_DEL.pdf</a> (in Slovenian)
Link to national central storage mechanism for regulated information (OAM)	<a href="http://INFO STORAGE - Officially appointed mechanism for the central storage of regulated information (oam.si)">INFO STORAGE - Officially appointed mechanism for the central storage of regulated information (oam.si)</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:tanja.gorse@atvp.si">tanja.gorse@atvp.si</a> <a href="mailto:tanja.lovka@atvp.si">tanja.lovka@atvp.si</a>

## Spain

A. General information	
National Competent Authority	Comisión Nacional del Mercado de Valores (CNMV)
Applicable national notification thresholds <sup>40</sup> (percentages)	3, 5, 10, 15, 20, 25, 30, 35, 40, 45, 50, 60, 70, 75, 80, 90
For further information, please refer to	<a href="https://www.cnmv.es/docPortal/legislacion/real-decre/RD1362_2007_ingles.pdf">https://www.cnmv.es/docPortal/legislacion/real-decre/RD1362_2007_ingles.pdf</a> <sup>41</sup> <a href="http://www.cnmv.es/DocPortal/Legislacion/Circulares/Circular_2_2022_EN.pdf">http://www.cnmv.es/DocPortal/Legislacion/Circulares/Circular_2_2022_EN.pdf</a> <sup>42</sup>

B. Filing of a notification	
Standard form	Required (for link please see section D below)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Royal Decree 1362/2007 of 19 October 2007 Art.23.1</li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) /</li> </ul>	<p>Trade date</p> <p>Publication under TD Art. 15 / Royal Decree 1362/2007 of 19 October 2007 Art. 38.2</p>

<sup>40</sup> Further to these thresholds and as part of its transposition of the Transparency Directive, Spain has laid down thresholds in relation to shares in companies under a takeover bid. For such companies, shareholders have to notify each time they reach or cross a 1% threshold. If the shareholder holds more than 3% of voting rights in the company, (s)he has to notify every transaction. Other countries may have similar requirements, however these will more often be laid down in the legislation transposing the Takeover Bids Directive and are therefore not mentioned in this document. Additionally, in its transposition of the Transparency Directive, Spain has put in place specific notification thresholds for shareholders which are residents in tax havens, nil tax countries or countries with which no effective exchange of tax information is in place; such shareholders have to notify each time they reach/cross a 1% threshold.

<sup>41</sup> Royal Decree 1362/2007 of 19 October 2007 implementing Law 24/1988, of 28 July on transparency requirements in relation to information about issuers whose securities are admitted to trading on an organized exchange or other regulated market in the European Union.

<sup>42</sup> Circular 2/2022, of 26 May, of the Spanish National Securities Market Commission, approving the templates for notification of significant shareholdings, issuer transactions in treasury stock and market makers. To incentivize long-term investments Spanish Company Law introduced loyalty shares. Under these provisions, Spanish companies with shares admitted to trading on a regulated market are allowed to include in their by-laws the possibility of granting additional voting rights to shareholders for each share held continuously for at least two years. The Spanish notification form for major holdings has been modified to allow inclusion of information related to loyalty shares. A new section 11 has been added to facilitate the disclosure of more detailed information on loyalty shares.

<p>Royal Decree 1362/2007 of 19 October 2007 Art. 23.3</p> <ul style="list-style-type: none"> <li>- Deadline for publication under TD Art. 15</li> </ul>	<p>End of month</p>										
<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Royal Decree 1362/2007 of 19 October 2007 Art. 35.1</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	<p>Six trading days following triggering event</p>										
<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Signature of notification required when notification is submitted</p>	<table border="1"> <tr> <td data-bbox="767 831 1078 1021"> <p>Digital portal (<a href="https://www.cnmv.es/Portal/Legislacion/ModelosN/ModelosN.aspx?id=COM&amp;lang=en">https://www.cnmv.es/Portal/Legislacion/ModelosN/ModelosN.aspx?id=COM&amp;lang=en</a>)</p> </td> <td data-bbox="1078 831 1393 1021"> <p>Post (Edison, 4, 28006 Madrid, Spain)</p> </td> </tr> <tr> <td colspan="2" data-bbox="767 1021 1393 1077"> <p>XML</p> </td> </tr> <tr> <td colspan="2" data-bbox="767 1144 1393 1200"> <p>No rule</p> </td> </tr> <tr> <td colspan="2" data-bbox="767 1200 1393 1256"> <p>No rule</p> </td> </tr> <tr> <td data-bbox="767 1256 1078 1323"> <p>To the NCA: Yes</p> </td> <td data-bbox="1078 1256 1393 1323"> <p>To the issuer: No rule</p> </td> </tr> </table>	<p>Digital portal (<a href="https://www.cnmv.es/Portal/Legislacion/ModelosN/ModelosN.aspx?id=COM&amp;lang=en">https://www.cnmv.es/Portal/Legislacion/ModelosN/ModelosN.aspx?id=COM&amp;lang=en</a>)</p>	<p>Post (Edison, 4, 28006 Madrid, Spain)</p>	<p>XML</p>		<p>No rule</p>		<p>No rule</p>		<p>To the NCA: Yes</p>	<p>To the issuer: No rule</p>
<p>Digital portal (<a href="https://www.cnmv.es/Portal/Legislacion/ModelosN/ModelosN.aspx?id=COM&amp;lang=en">https://www.cnmv.es/Portal/Legislacion/ModelosN/ModelosN.aspx?id=COM&amp;lang=en</a>)</p>	<p>Post (Edison, 4, 28006 Madrid, Spain)</p>										
<p>XML</p>											
<p>No rule</p>											
<p>No rule</p>											
<p>To the NCA: Yes</p>	<p>To the issuer: No rule</p>										
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	<p>Permitted<sup>43</sup></p>										

<sup>43</sup> Royal Decree 1362/2007 of 19 October 2007 Art. 36.1.



### C. Publication of a notification

Entity responsible for publishing notifications under TD Art. 12 / Royal Decree 1362/2007 of 19 October 2007 Art. 38.1	National Competent Authority
Deadline for publication after the date of receipt of notification	Three trading days after the day on which the notification was received

### D. Further information

Link to standard form (if applicable)	<a href="https://www.cnmv.es/Portal/Legislacion/ModelosN/ModelosN.aspx?id=COM&amp;lang=en">https://www.cnmv.es/Portal/Legislacion/ModelosN/ModelosN.aspx?id=COM&amp;lang=en</a>
Link to national central storage mechanism for regulated information (OAM)	<a href="http://www.cnmv.es/Portal/Consultas/IndiceEI R.aspx?lang=en">http://www.cnmv.es/Portal/Consultas/IndiceEI R.aspx?lang=en</a>
Contact details for National Competent Authority if further information is needed	<a href="mailto:DIFC-informacion@cnmv.es">DIFC-informacion@cnmv.es</a>

## Sweden

A. General information	
National Competent Authority	Finansinspektionen (Swedish Financial Supervisory Authority)
Applicable national notification thresholds <sup>44</sup> (percentages)	5, 10, 15, 20, 25, 30, 50, 2/3, 90
For further information, please refer to	<a href="http://www.fi.se/en/markets/reporting/changes-in-shareholdings">http://www.fi.se/en/markets/reporting/changes-in-shareholdings</a>

B. Filing of a notification	
Standard form	Optional (Finansinspektionen has drawn up an own notification form, but does not strictly require this to be used, as the legal requirement is simply to submit the notification “in writing”.)
<p>Triggering event</p> <p><i>The triggering event is the point in time at which a shareholder reaches, exceeds or falls below a notification threshold.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for on-exchange transactions under TD Art. 9(1) / Chapter 4, paragraph 3 and 5 of the Financial Instruments Trading Act (SFS 1991:980)</li> </ul> <p><i>On-exchange transactions are transactions which are carried out on a regulated market.</i></p> <ul style="list-style-type: none"> <li>- Triggering event for passive crossings, i.e. when there is a change in the breakdown of voting rights under TD Art. 9(2) / Chapter 4, paragraph 9 section 2 of the Financial Instruments Trading Act (SFS 1991:980)</li> <li>- Deadline for publication under TD Art. 15</li> </ul>	<p>Trade date</p> <p>Publication under TD Art. 15 / Chapter 4, paragraph 9 section 1 of the Financial Instruments Trading Act (SFS 1991:980)</p> <p>End of month (last trading day<sup>45</sup>)</p>

<sup>44</sup> The notification thresholds apply to both holdings of shares and of voting rights in Sweden.

<sup>45</sup> In Sweden the requirement is that publication takes place on the last trading day of the month, regardless of whether there has been a prior publication or not.

<p>Deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 / Chapter 4, paragraph 10 of the Financial Instruments Trading Act (SFS 1991:980)</p> <p><i>The deadline for notifying covers the maximum permitted time for learning of the triggering event and for making the notification.</i></p>	<p>Three trading days following triggering event</p>										
<p>Notifying the National Competent Authority</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> </ul> <ul style="list-style-type: none"> <li>- Permitted format(s)</li> </ul> <p>Notifying the issuer</p> <ul style="list-style-type: none"> <li>- Permitted channel(s)</li> <li>- Permitted format(s)</li> </ul> <p>Signature of notification required when notification is submitted</p>	<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; vertical-align: top;"> <p>Email (<a href="mailto:rapportering@fi.se">rapportering@fi.se</a> and <a href="mailto:reporting@fi.se">reporting@fi.se</a>)</p> <p>Digital portal (<a href="https://finanscentrale.n.fi.se/flag.aspx">https://finanscentrale.n.fi.se/flag.aspx</a>)</p> </td> <td style="width: 50%; vertical-align: top;"> <p>Fax (+468241335) Post (Finansinspektionen (Att: Market Monitoring), Box 7821, 103 97 Stockholm)</p> </td> </tr> <tr> <td colspan="2" style="text-align: center;"> <p>No rule</p> </td> </tr> <tr> <td colspan="2" style="text-align: center;"> <p>No rule</p> </td> </tr> <tr> <td colspan="2" style="text-align: center;"> <p>No rule</p> </td> </tr> <tr> <td style="text-align: center;"> <p>To the NCA: Yes</p> </td> <td style="text-align: center;"> <p>To the issuer: No</p> </td> </tr> </table>	<p>Email (<a href="mailto:rapportering@fi.se">rapportering@fi.se</a> and <a href="mailto:reporting@fi.se">reporting@fi.se</a>)</p> <p>Digital portal (<a href="https://finanscentrale.n.fi.se/flag.aspx">https://finanscentrale.n.fi.se/flag.aspx</a>)</p>	<p>Fax (+468241335) Post (Finansinspektionen (Att: Market Monitoring), Box 7821, 103 97 Stockholm)</p>	<p>No rule</p>		<p>No rule</p>		<p>No rule</p>		<p>To the NCA: Yes</p>	<p>To the issuer: No</p>
<p>Email (<a href="mailto:rapportering@fi.se">rapportering@fi.se</a> and <a href="mailto:reporting@fi.se">reporting@fi.se</a>)</p> <p>Digital portal (<a href="https://finanscentrale.n.fi.se/flag.aspx">https://finanscentrale.n.fi.se/flag.aspx</a>)</p>	<p>Fax (+468241335) Post (Finansinspektionen (Att: Market Monitoring), Box 7821, 103 97 Stockholm)</p>										
<p>No rule</p>											
<p>No rule</p>											
<p>No rule</p>											
<p>To the NCA: Yes</p>	<p>To the issuer: No</p>										
<p>Intra-day netting</p> <p><i>Intra-day netting means that a shareholder who exceeds a notification threshold and falls below the same notification threshold later in the same trading day nets the voting rights for the calculation of the notification position.</i></p>	<p>Permitted</p>										

### C. Publication of a notification

<p>Entity responsible for publishing notifications under TD Art. 12 / Chapter 4, paragraph 11 of the Financial Instruments Trading Act (SFS 1991:980)</p>	<p>National Competent Authority</p>
<p>Deadline for publication after the date of receipt of notification</p>	<p>At 12:00 (mid-day) on the trading day after the day on which the notification was received</p>

D. Further information	
Link to standard form (if applicable)	<a href="http://www.fi.se/contentassets/15eabba2304c427fb44e8c4e5d185ede/flaggning/notificaton-changes-major-shareholdings-ny.pdf">http://www.fi.se/contentassets/15eabba2304c427fb44e8c4e5d185ede/flaggning/notificaton-changes-major-shareholdings-ny.pdf</a>
Link to national central storage mechanism for regulated information (OAM)	<a href="https://finanscentralen.fi.se/search/Search.aspx">https://finanscentralen.fi.se/search/Search.aspx</a>
Contact details for National Competent Authority if further information is needed	Tel.: +46840898144 Email: <a href="mailto:listedcompanies@fi.se">listedcompanies@fi.se</a>

## **PART II: TRANSVERSAL TABLES**

Part II of the Practical Guide presents information in relation to the rules and practices for the filing and publication of notifications of major holdings in EEA countries. The information in Part II is set out in ten transversal tables, making it possible to compare rules across different jurisdictions.

- Table 1 presents the notification thresholds applied under TD Art. 9.
- The following tables set out information about the triggering event under TD Art. 9(1) (Table 2), in cases where the exercise of a physically settled financial instrument leads to an acquisition of shares with voting rights (Table 3) and under TD Art. 9(2) (Table 4).
- Tables 5 and 6 contain the rules regarding the deadline for learning of the triggering event under TD Art. 9(1) and 9(2), while Table 7 provides information on the deadline for making notifications to the issuer.
- Tables 8 and 9 set out the permitted channels and formats for submitting notifications to National Competent Authorities and issuers.
- Finally, Table 10 presents the deadline for publishing a notification of major holdings.

**Table 1: Applicable notification thresholds under TD Article 9**

Country	Percentage of shareholding																								
AT	3 <sup>1</sup>	4	5	10	15	20	25	30	35	40	45	50					75			90					
BE			5	10	15	20	25	30	35	40	45	50	55	60	65	70	75	80	85	90	95				
BG			5	10	15	20	25	30	35	40	45	50	55	60	65	70	75	80	85	90	95				
CY			5	10	15	20	25	30				50					75								
CZ	1 <sup>2</sup>	3 <sup>2</sup>	5	10	15	20	25	30		40		50					75								
DE		3 <sup>3</sup>	5	10	15	20	25	30				50					75								
DK			5	10	15	20	25	1/3				50					2/3				90				
EE			5	10	15	20	25	1/3				50					2/3								
EL			5	10 <sup>4</sup>	15	20	25	1/3				50					2/3								
ES <sup>5</sup>		3	5	10	15	20	25	30	35	40	45	50		60		70	75	80			90				
FI <sup>6</sup>			5	10	15	20	25	30				50					2/3				90				
FR			5	10	15	20	25	30				50					2/3				90	95			
								+																	
								1/3																	
HR			5	10	15	20	25	30				50					75								
HU			5	10	15	20	25	30	35	40	45	50					75	80	85	90	95				
																					91	96			
																						92	97		
																							93	98	
																								94	99
IE (IE issuers except CEIFs)	3% and each 1% thereafter up to 100%																								
(non-IE issuers and CEIFs)			5	10	15	20	25	30				50					75								
IS			5	10	15	20	25	30	35	40		50					2/3				90				
IT		3 <sup>7</sup>	5	10 <sup>8</sup>	15	20 <sub>8</sub>	25 <sub>8</sub>	30				50					2/3				90				
LT			5	10	15	20	25	30				50					75					95			
LU			5	10	15	20	25	1/3				50					2/3								
LV			5	10	15	20	25	30				50					75					90			
MT			5	10	15	20	25	30				50					75					90			
NL		3	5	10	15	20	25	30		40		50		60			75					95			
NO			5	10	15	20	25	1/3				50					2/3					90			
PL <sup>9</sup>			5	10	15	20	25	33				50					75					90			
								+																	
								1/3																	
PT <sup>10</sup>			5	10	15	20	25	1/3				50					2/3					90			
RO			5	10	15	20	25	33				50					75								
SE <sup>11</sup>			5	10	15	20	25	30				50					2/3					90			
SI			5	10	15	20	25	1/3				50					75								
SK			5	10	15	20	25	30				50					75								

*Comments:*

While, for the purpose of clarity, the styles “1/3” and “2/3” are used for all countries who have adopted thresholds of one and two thirds, some countries use a different style in their national legislation, such as “33 1/3” and “66 2/3”.

Mandatory thresholds under TD Article 9 are marked in light blue.

*Notes:*

1: The threshold of 3% applies only to issuers which have stipulated this threshold value in their articles of association. A special condition for this to become effective is the publication of the relevant clause of the articles of association on the issuer’s website and a notification to the FMA.

2: The thresholds of 1% and 3% are "size adjusted" whereby the 3% threshold only applies to holdings in companies with share capital > 100m CZK and the 1% threshold only applies to holdings in companies with share capital > 500m CZK.

3: The 3% threshold applies only for notifying voting rights (TD Art. 9/10), but not for positions arising out of financial instruments (TD Art. 13) or aggregated positions (TD Art. 13a).

4: Shareholders who have crossed the 10% threshold are required to notify any increase or decrease in their holdings which is equal to or greater than 3%.

5: Further to the thresholds in the table, as part of its transposition of the TD Spain has laid down thresholds in relation to shares in companies under a takeover bid. For such companies, shareholders have to notify each time they reach or cross a 1% threshold. If the shareholder holds more than 3% of voting rights in the company, (s)he has to notify every transaction. Other countries may have similar requirements, however these will more often be laid down in the legislation transposing the Takeover Bids Directive and are therefore not mentioned here. Additionally, in its transposition of the TD Spain has put in place specific notification thresholds for shareholders which are residents in tax havens, nil tax countries or countries with which no effective exchange of tax information is in place; such shareholders have to notify each time they reach/cross a 1% threshold.

6: In Finland shareholders are required to notify both voting rights and shares.

7: The 3% threshold is applicable only to holdings in non-SME companies.

8: A declaration of intent, i.e. a statement of investment objectives, will be required when the 10%, 20%, and 25% threshold is exceeded.

9: Shareholders who have crossed the 10% threshold are required to notify any increase or decrease in their holdings which is equal to or greater than a) 2% in case of companies admitted to trading on the official listing of the regulated markets; and b) 5% in case of companies admitted to trading other market segments of the regulated market or admitted to trading on an MTF. Additionally, shareholders who have crossed the 33% threshold are required to notify any increase or decrease in their holdings which is equal to or greater than 1%.

10: Some of these thresholds are also applicable to “sociedades abertas”, that is issuers within the Portuguese scope of public company but whose shares are not admitted to trading on a regulated market. The obligation to notify major holdings in “sociedades abertas” only applies until 31/12/2022 (as from that date the concept “sociedades abertas” will be suppressed from Portuguese law).

11: In Sweden shareholders are required to notify both voting rights and shares.

**Table 2: Triggering event under TD Art. 9(1)**

	On-exchange transactions	Off-exchange transactions	Exercise of subscription rights in share capital increase
Trade date	BE, CY, DE, DK, EE, EL, ES, FI, FR, HR, HU, IE, IS, IT, LT, LU, NL, NO, PL, PT, SE, SI	DE, DK, EE, ES, IS, LT, LU	
Settlement date	AT, BG, CZ, LV, MT, RO, SK	AT, BG, CZ, HU, LV, MT, RO, SK	AT, FR, LV
Trade/agreement date		BE, CY, EL, FI, FR, HR, IE, IT, NL, NO, PT, SE, SI	
Registration date of share capital increase			BE, BG, CY, DE, ES, FI, HR, HU, LT, LU, PL, PT, SE, SK
Publication of total number of voting rights under TD Art. 15			DK, EE, IE, IS, IT, RO <sup>1</sup>
Start of trading of shares			EL, MT
Publication of the share capital increase results			NO
Exercise of subscription rights / Conclusion of subscription contract			CZ, NL, SI
Miscellaneous		PL <sup>2</sup>	

**Notes:**

1: While Art. 71 paragraph (4) of Law 24/2017 on issuers of financial instruments and market operations as amended obliges the issuer to disclose the total number of shares and accompanying voting rights at the end of each calendar month in which an increase or a decrease in the share capital or voting rights occurred, in practice this information is published immediately by the central depository on the website of the market operator.

2: The triggering event takes place on the date on which the shareholder becomes or could become aware of the change in his/her share in the total number of voting rights.



**Table 3: Triggering event in cases where the exercise of a physically settled financial instrument leads to an acquisition of shares with voting rights**

	Options	Futures	Swaps	Warrants
Date of exercise	BE, BG, CY, DE, DK, EE, EL, ES, FR, IE, IS, IT, LT, LU, NL, PT, SE		NL	BE, BG, CY, DE, DK, EE, EL, ES, FR, IE, IS, IT, LU, NL, PT, SE
Settlement date	AT, CZ, FI, MT, RO, SK	AT, CZ, FI, MT, PT, RO, SK	AT, CZ, FI, MT, PT, RO, SK	AT, CZ, FI, MT, RO, SK
Date of maturity		BE, BG, CY, DE, DK, EE, EL, ES, FR, IE, IS, IT, LU, NL and SE		
Date of expiration/maturity			BE, BG, CY, DE, DK, EE, EL, ES, FR, IE, IS, IT, LU, SE	
Trade/agreement date	HR, HU, NO, SI	HR, HU, NO, SI	HR, HU, NO, SI	HR, HU, NO, SI
Miscellaneous	LV <sup>1</sup> , PL <sup>1</sup>	LT <sup>1</sup> , LV <sup>1</sup> , PL <sup>1</sup>	LT <sup>1</sup> , LV <sup>1</sup> , PL <sup>1</sup>	LT <sup>1</sup> , LV <sup>1</sup> , PL <sup>1</sup>

Notes:

1: Lithuania, Latvia and Poland have no specific rule in relation to this topic.

**Table 4: Triggering event under TD Art. 9(2)**

Publication of total number of voting rights under TD Art. 15	CY, DK, EE, ES, FI, HR, IE, IT, LU, NL, RO <sup>1</sup> , SE
Registration date of share capital increase	AT, BE, BG, DE, HU, LT, LV, NO, PL, PT, SI, SK
Publication of the share capital increase results	IS, MT,
Settlement Date	FR
Start of trading of shares	EL
Miscellaneous	CZ <sup>2</sup>

Note:

1: While Art. 71 paragraph (4) of Law 24/2017 on issuers of financial instruments and market operations as amended obliges the issuer to disclose the total number of shares and accompanying voting rights at the end of each calendar month in which an increase or a decrease in the share capital or voting rights occurred, in practice this information is published immediately by the central depository on the website of the market operator.

2: A distinction is made between capital decreases for which the triggering event is the registration date in the company register and capital increases for which the triggering event is the date determined by the issuer at the shareholders' meeting which will be not prior to the exercise of subscription rights and not later than on the registration date in the company register.

**Table 5: Deadline for learning of triggering event under TD Art. 9(1)**

	On-exchange transactions	Off-exchange transactions
Two trading days after triggering event	AT <sup>1</sup> , BE, BG, CY, CZ, DE <sup>2</sup> , EE, ES, FI, HR, IE, LT, LU, LV, NL, PT, SK	AT <sup>1</sup> , BE, BG, CY, CZ, DE, EE, FI, IE, LT, LU, NL, PT, SK
Trading day following the triggering event	IT	IT
On the same day as the triggering event	DK, EL, FR, IS, MT, PL, RO, SE, SI	DK, EL, ES, FR, HR, IS, LV, MT, PL, RO <sup>3</sup> , SE, SI
Miscellaneous	HU <sup>4</sup> , NO <sup>5</sup>	HU <sup>4</sup> , NO <sup>5</sup>

**Notes:**

- 1: Although the notifiable person shall be deemed to have knowledge of the triggering event no later than two trading days following the transaction and the deadline for making the notification shall be no later than two further trading days, in general, the notification shall be submitted promptly but not later than two trading days after the threshold was crossed.
- 2: The total deadline for disclosing a notification, i.e. learning of the triggering event plus deadline for making the notification (see table 7), is in practice generally four trading days. Only in very extraordinary cases may the deadline of six trading days apply.
- 3: In case of certain off-exchange transactions, the settlement date is three trading days after the transaction rather than the generally applicable settlement date of two trading days after the transaction. However, for those off-exchange transactions, the deadline for learning of the triggering event is still two trading days after the transaction.
- 4: Hungary does not apply a specific deadline for learning of the triggering event which is considered to take place immediately after the triggering event.
- 5: Norway considers the person to have learned when the person becomes aware of or should have been aware of the transaction after the triggering event.

**Table 6: Deadline for learning of triggering event under TD Art. 9(2)**

Publication of total number of voting rights under TD Art. 15	AT, BE, CY, DE, DK, EE, ES, FI, FR, HR, IE, IT, LT, LU, NL, RO <sup>1</sup> , SE
Registration of share capital increase in company register	BG, CZ, HU, LV, PL, PT, SI
Publication of results of share capital increase by issuer	IS, MT, SK
Miscellaneous	EL <sup>2</sup> , NO <sup>3</sup>

**Notes:**

- 1: While Art. 71 paragraph (4) of Law 24/2017 on issuers of financial instruments and market operations as amended obliges the issuer to disclose the total number of shares and accompanying voting rights at the end of each calendar month in which an increase or a decrease in the share capital or voting rights occurred, in practice this information is published immediately by the central depository on the website of the market operator.
- 2: While the person subject to the notification obligation is assumed to be informed when the publication of the total number of voting rights under TD Article 15 takes place, this most often takes place before the start of trading of shares.
- 3: The matter is assessed on a case-by-case basis.

**Table 7: Deadline for making notification to the issuer**

<b>Same day as learning</b>	DK <sup>1</sup>
<b>One trading day after learning</b>	FI
<b>Two trading days after learning</b>	AT, IE <sup>2</sup>
<b>Three trading days after learning</b>	CY, EL, SE
<b>Four trading days after learning</b>	BE, BG, CZ, DE <sup>3</sup> , EE, ES, FR, HR, IE <sup>4</sup> , IS, IT, LT, LU, LV, MT, NL <sup>5</sup> , PT, RO, SI, SK
<b>Miscellaneous</b>	HU <sup>6</sup> , NO <sup>7</sup> , PL <sup>8</sup>

**Notes:**

- 1: From 1 January 2018, the deadline for notifying on-exchange transactions under TD Art. 12(2) and L2D Art. 9 will be four trading days after learning (section 41 of the Capital Market act).
- 2: Applicable to shareholders in all issuers except non-Irish issuers and CEIFs.
- 3: The total deadline for disclosing a notification, i.e. learning of the triggering event (see table 5) plus deadline for making the notification, is in practice generally four trading days. Only in very extraordinary cases may the deadline of six trading days apply.
- 4: Applicable to shareholders in non-Irish issuers and CEIFs.
- 5: As the National Competent Authority informs the issuer of the filing of the notification, shareholders do not have to submit their notification to the issuer.
- 6: Hungary applies a deadline of two calendar days after learning.
- 7: The notification has to be made immediately. In cases where the crossing is done by a group which holds shares across different entities and different time zones, or an asset manager which carry out asset management for different funds across different time zones, this may be taken into consideration when deciding the deadline. However, such groups or managers must have routines in place making it possible to notify the market quickly. In any case the final deadline is before opening of the market the second day after the trade which leads to the crossing of the threshold and in any case before opening of the market the second day after the transaction which leads to the crossing of the threshold.
- 8: Six trading days following the triggering event for on exchange transactions and four working days for off-exchange transactions.

**Table 8: Channels for submitting notifications to NCAs and issuers**

	Email		Digital portal		Fax		Post	
	NCA	Issuers	NCA	Issuers	NCA	Issuers	NCA	Issuers
AT		x <sup>1</sup>	x			x <sup>1</sup>		x <sup>1</sup>
BE	X	x						
BG	X	x			x	x	x	x
CY	X				x		x	
CZ			x				x	
DE					x	x	x	x
DK			x					
EE	X				x		x	
EL	X				x		x	
ES			x				x	
FI	X							
FR	X				x		x	
HR							x	
HU			x					
IE	X							
IS	X	x <sup>1</sup>						
IT	x <sup>2</sup>		x				x	
LT	X	x					x	x
LU	X						x	
LV	X	x					x	x
MT	X						x	
NL	x <sup>3</sup>		x					
NO	X				x			
PL	X				x		x	
PT <sup>4</sup>	X	x			x	x	x	x
RO		x <sup>5</sup>				x		x
SE	X		x		x		x	
SI	X				x		x	
SK	X				x		x	
<b>Total</b>	<b>21</b>	<b>8</b>	<b>8</b>	<b>-</b>	<b>12</b>	<b>5</b>	<b>19</b>	<b>7</b>

**Notes:**

- 1: Austria and Iceland have not established rules regarding submission of notifications to issuers but have described the informal market practice in this area.
- 2: Email notifications to the Italian National Competent Authority have to be performed by way of certified email or email with an electronic signature.
- 3: Only in case the digital portal is unavailable due to technical problems.
- 4: Portugal has not established rules regarding submission of notifications to the National Competent Authority or to issuers but has described the informal market practice in this area.
- 5: Email notifications have to include an incorporated extended electronic signature.

**Table 9: Permitted formats for submitting notifications to NCAs and issuers**

	Word document	HTML	Readable PDF	Excel file	XML
BE			x	x <sup>1</sup>	
BG	x				
CZ	x		x		
ES <sup>2</sup>					x
FR	x		x		
IT <sup>2</sup>	x		x		
LT	x		x		
NL <sup>2</sup>		x			
PT <sup>3</sup>	x		x	x	

*Comment:*

Only National Competent Authorities who have taken a position in this area are mentioned.

*Notes:*

- 1: The use of an excel file is only permitted for submitting notifications to the National Competent Authority.
- 2: The format rules apply only when submitting notifications to the National Competent Authority. When the digital portal is unavailable due to technical problems, it is permitted to submit notifications in a non-readable PDF.
- 3: Portugal has not established rules regarding the format for submission of notifications but have described the informal market practice in this area.

**Table 10: Deadline for publishing the notification**

Same day as receipt	DK <sup>1</sup> , PL
One trading day after receipt	CY, IE <sup>2</sup> , LV, NL <sup>3</sup>
Two trading days after receipt	AT, EL, HR,
Three trading days after receipt	BE, BG, CZ, DE, EE, ES, FR, IE <sup>4</sup> , IS, IT, LT, LU, MT, PT, RO, SI, SK,
Miscellaneous	FI <sup>5</sup> , HU <sup>6</sup> , NO <sup>7</sup> , SE <sup>6</sup>

*Notes:*

- 1: From 1 January 2018, the deadline for publication will be three days after the notification is received.
- 2: Applicable to all issuers except non-Irish issuers and CEIFs.
- 3: The deadline for publishing the notification is on the trading day after the day on which the notification was received by the NCA.
- 4: Applicable to non-Irish issuers and CEIFs.
- 5: Publication of the notification should be made as soon as possible; this will in most cases be on the day when the notification is made but the issuer may delay publication in order to receive corrected or supplementary information in relation to the notification.
- 6: The deadline for publishing the notification is two calendar days following receipt.
- 7: The notification must be published in an effective and non-discriminating manner; no deadline in terms of days has been defined.