



eRIIS User Guide – Notifications for holders of securities

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eRIIS User Guide – Notifications for holders of securities

1. Introduction

eRIIS (electronic Reporting of Information concerning Issuers of Securities) is a new portal that has been established by the CSSF to enable entities subject to the Transparency Law¹ and the Market Abuse Regulation² to fulfil their filing obligations. Two types of entities are concerned: (1) issuers of securities and (2) holders of securities (for notifications of major holdings and/or for notifications by Persons Discharging Managerial Responsibilities within an issuer).

This complementary User Guide is about “**Notifications for holders of securities**”. It presents how holders of securities can file major holding as well as manager’s transactions notifications in the eRIIS portal.

Please be aware that as from 4 March 2022 the CSSF requires all submissions of information to the CSSF required under the Transparency Law and the Market Abuse Regulation to be carried out through eRIIS. Should you experience difficulties in creating a User Account or in case of delays incompatible with filing deadline legal requirements, please contact the CSSF via eRIIS.support@cssf.lu.

2. Overview

Filings on the eRIIS portal can be done either by Reporting Entities in their capacity as holders of securities or as issuers of securities. The present User Guide only concerns Reporting Entities that file notifications as **holders of securities** (notifications by users in their capacity as or on behalf of holders of securities, i.e. either “Managers’ transactions notifications” or “Major holding notifications”). It does not concern the filings by issuers in relation to the publication of information included in such notifications.

¹ Law of 11 January 2008 on transparency requirements for issuers.

² Regulation (EU) No 596/2014 of the European Parliament and of the Council of 16 April 2014 on market abuse.

3. Concepts of User Account and Reporting Entity

Before being able to submit major holding or managers' transactions notifications, it is important to understand the fundamental distinction between the concepts of User Account and Reporting Entity. This has already been detailed in the User Guide "Access and Authentication".

The first step is the creation of a **User Account** in eRIIS¹. A User Account is needed to access the eRIIS portal: it identifies the physical person who is submitting a filing for and on behalf of a **Reporting Entity**.

For example: "Mr. X" creates an eRIIS account because he wants to submit a major holding notification on behalf of "Company X-Y-Z S.A."

Following the creation of a User Account, such account must be linked to the Reporting Entity² on which behalf a filing is to be done. Please note that in certain cases User Accounts and Reporting Entities may refer to the same person³.

Two scenarios may occur here:

1) The Reporting Entity already exists in eRIIS

In such case, we kindly ask you to rely on the already existing Reporting Entity to file information. This can be done by any User Account assigned to said Reporting Entity.⁴

In certain cases you may not be aware that the Reporting Entity has already been created in eRIIS by another user. If this is the case, you need to identify (within your Reporting Entity) the person acting as SuperUser of the Reporting Entity (as only the SuperUser can grant you the necessary rights).⁵

¹ Please refer to point 2. User Account of our User Guide "Access and Authentication".

² Please refer to point 3. Reporting Entities of our User Guide "Access and Authentication".

³ This is notably the case where a natural person intends to file information on its own behalf. In such cases, the person in question is required to first obtain a User Account (on behalf of the concerned person's name) and subsequently create a Reporting Entity (the same concerned persons) to which the afore-mentioned User Account will be assigned.

⁴ Only the main, so-called Super User will be assigned by the CSSF to the Reporting Entity. Any further User Accounts (to be assigned to or revoked from the Reporting Entity) are managed by the Super User.

⁵ Please refer to the User Guide Roles and Rights Management for further details

For example: "Following his eRIIS User Account creation, Mr. X needs to be linked to the Reporting Entity "Company X-Y-Z" to submit filings. He contacts his colleague Ms. Y, who is the Super User and has already done filings on behalf of this Reporting Entity in the past. Ms. Y (in her capacity as Super User of the Reporting Entity) gives Mr. X the necessary access rights. He may now proceed with his first filing."

2) The Reporting Entity does not exist in eRIIS

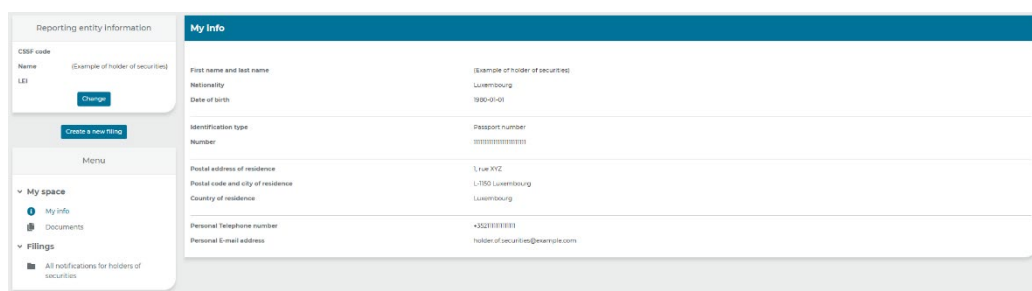
In the absence of an existing Reporting Entity in eRIIS, the User Account must request its creation within eRIIS. To create a new Reporting Entity, please click on "Create a new reporting entity" and follow the instructions.

Following the request for the creation of a new Reporting Entity (and even before validation by the CSSF), the User account having filed the request will immediately be able to submit major holding and managers' transactions notifications on its behalf.

4. Major holding notifications

To file a major holding notification in eRIIS as (or on behalf of) holder of securities, please proceed as follows:

- (1) Access eRIIS and (depending on your situation) choose the appropriate Reporting Entity. The following screen should appear:



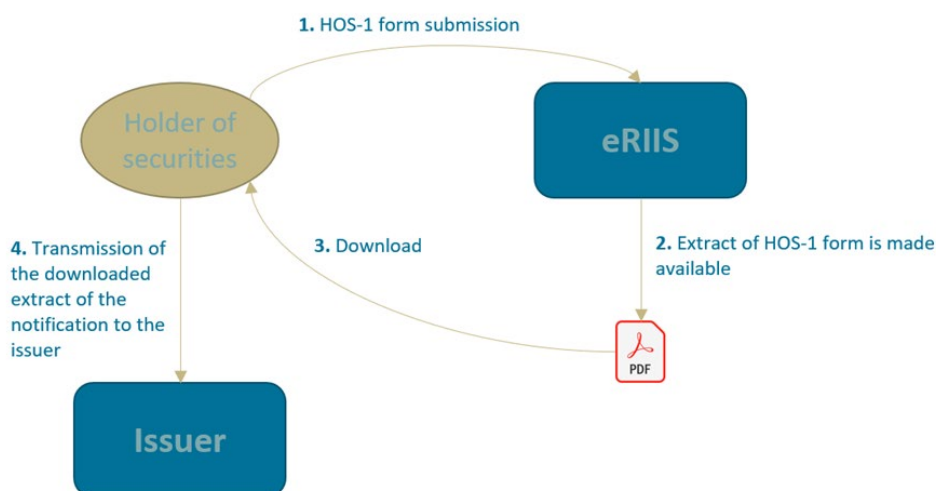
| Reporting entity information | |
|---|-----------------------------------|
| CSSF code | (Example of holder of securities) |
| Name | |
| LEI | |
| Change | |
| Create a new filing | |
| Menu | |
| My space | |
| My info | |
| Documents | |
| Filings | |
| All notifications for holders of securities | |

| My info | |
|-----------------------------------|-----------------------------------|
| First name and last name | (Example of holder of securities) |
| Nationality | Luxembourg |
| Date of birth | 1980-01-01 |
| Identification type | Passport number |
| Number | XXXXXXXXXXXX |
| Postal address of residence | 1, rue XYZ |
| Postal code and city of residence | L-1150 Luxembourg |
| Country of residence | Luxembourg |
| Personal telephone number | +352XXXXXXXX |
| Personal e-mail address | holderofsecurities@example.com |

- (2) Click on "Create a new filing".
- (3) Select the metadata type "Major holding notification" and press "Next".
- (4) In the "Metadata" screen section, fill in the necessary information as required under Part 1 to Part 6. Click on "Save" at the bottom of each Part. Please be aware that tables can only be filled after the form has been saved a first time.

- (5) If necessary, additional documents concerning the major holding notification can be included in the filing by selecting "Documents" (in the "Menu" section) and adding the document(s) in question under "Appendix". Note in that respect that if the last checkbox of Part4 ("The full chain of controlled undertakings is too complex to illustrate under point 8 of this form [...].") is selected, one document (at least) mandatorily needs to be added as "Appendix" under "Documents".
- (6) When Part1 to Part6 are completed and saved (and, depending on the case, any document included), the major holding notification may be submitted to the CSSF by clicking on "Submit" (under "Actions") and confirming the submission.
- (7) An email of acknowledgement of receipt of the filing submission will be sent by eRIIS. This email includes a reference number attributed to the filing.
- (8) The email will urge you to download the notification form, which is accessed under "Documents" / "Main" (in the "Menu" section). When filing said notification form with the issuer concerned, please also indicate the CSSF reference number mentioned under point (7) above in the email to the issuer. Note that any complementary document added under "Appendix" will not be included in the notification form generated by eRIIS. Any complementary document thus needs to be included in the email of filing to the issuer, in complement to the notification form itself.

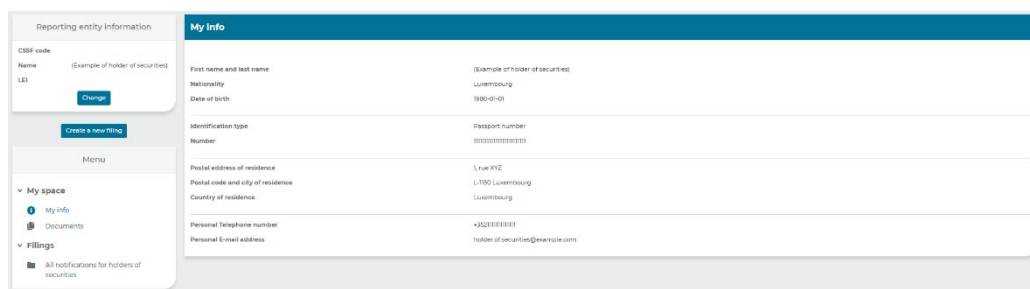
For an overview regarding the workflow, please refer to the following chart:



5. Manager's transactions notifications

To file a manager's transactions notification in eRIIS as (or on behalf of) holder of securities, please proceed as follows:

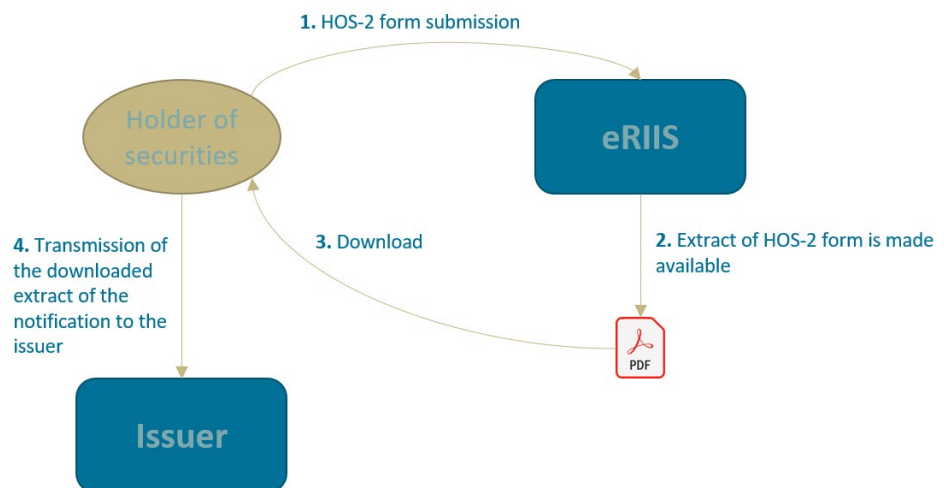
- (1) Access eRIIS and (depending on your situation) choose the appropriate Reporting Entity. The following screen should appear:



- (2) Click on "Create a new filing".
- (3) Select the metadata type "Manager's transactions notification" and press "Next".
- (4) In the "Metadata" screen section, fill in the necessary information as required under the "General information and context", "Details of the transactions" and "Additional information" parts. Click on "Save" at the bottom of each Part. Please be aware that tables can only be filled after the form has been saved a first time.
- (5) If necessary, additional documents concerning the major holding notification can be included in the filing by selecting "Documents" (in the "Menu" section) and adding the document(s) in question under "Appendix".
- (6) When the "General information and context", "Details of the transactions" and "Additional information" parts are completed and saved (and, depending on the case, any document included), the manager's transactions notification may be submitted to the CSSF by clicking on "Submit" (under "Actions") and confirming the submission.
- (7) An email of acknowledgement of receipt of the filing submission will be sent by eRIIS. This email included a reference number attributed to the filing.

(8) The email will urge you to download the notification form, which is accessed under “Documents” / “Main” (in the “Menu” section). When filing said notification form with the issuer concerned, please also indicate the CSSF reference number mentioned under point (7) above in the email to the issuer. Note that any complementary document added under “Appendix” will not be included in the notification form generated by eRIIS. Any complementary document thus needs to be included in the email of filing to the issuer, in complement to the notification form itself.

For an overview regarding the workflow, please refer to the following chart:



6. Helpdesk

In case of questions or problems regarding the use of eRIIS, please contact :

eRIIS.support@cssf.lu



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