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## 4 REPORTING FROM NOMINEES

### 4.1 General

Reporting from nominees includes registers of owners, public registers of owners, general meeting registers of shareholders, other registers of owners, information for the production of labels, dividends on Swedish depository receipts and foreign shares, as well as holdings of premium bonds in conjunction with extra lottery prize draws.

Orders which concern nominee-registered owners are forwarded by VPC in file format to all AOs designated by the nominee. The order states which security/securities are referred to, the record date and the type of list.

Each nominee can authorise one or more AOs to carry out the reporting.

An automatic check is made of the material from the nominees so that it is correct as regards format, securities, nominee account number, record date, etc. Any errors are reported to / amended by the AO appointed by the nominee.

VPC compiles the material from the nominees and produces the required list or the details for calculating foreign dividends.

The AO appointed by the nominee will normally deliver the material in ONE file. Where several different record dates are concerned, however, these must be divided into different files, each with a separate record date. These files can be sent on the same day. If more than one file is sent on the same day referring to the SAME record date, the holdings are combined before registration takes place. If more than one file is sent on DIFFERENT days for the same record date, the most recently sent file is rejected unless removal has been effected via IFBT of the previous material transmitted. If the files are delivered stating different nominee accounts, they will in any case be combined. More than one file with the same record date should only be used after consultation with VPC.

The descriptions below cover those transactions that are required for a nominee to be able to send material to VPC for the compilation of different registers of owners.

When ordering information for the compilation of registers of owners, labels or dividend on Swedish depository receipts and foreign shares, the record date will be specified in ID-FILE-REPLY2 in the FILE-HEADER (see the chapter on Transactions and reports, processing). The idea is to make it easier to be able to distinguish between various VPC orders that are currently being processed. The record date will then be shown alongside each order (trans: ZOVE). If the same text is sent in the ID-FILE-REPLY2 in the nominee's reply, this facilitates the work at VPC, where one or more files are received every day from a large number of nominees (trans: ZLAN, ZLFE).

The transactions referred to are also available to nominees via a terminal and show files that have been transferred to VPC but have not yet been processed (ZLAN), as well as files that have been error-marked in conjunction with transfer (ZLFE).

You are therefore requested to return the contents in the ID-FILE-REPLY2 in the corresponding field in your reply to each order.

Files transferred from nominees that have been received by 20.55 will be processed at VPC the same evening, though at the earliest in the evening of the first bank day after record day. With the exception of voting rights, VPC processes the delivered material twice each day on the three bank days following the record date. In the morning after delivery of the file - at the earliest on the second bank day after record day - the results of the processing are accessible to the nominee, using transaction ZLVI (see lists named IFAL093x). If errors are detected that result in the rejection of a file no list will be found on ZLVI the following morning. In such cases, the error must always be corrected after consulting VPC.

#### Register of owners

At the request of an issuer, or *anyone* in the case of public registers of owners, VPC will compile material in order to produce the list required.

When ordering address lists (labels), the nominee is expected, where applicable, to supply information concerning the guardian or representative instead of the owner.

Shareholders who have registered their holdings with a nominee may have the holdings temporarily owner-registered in a company prior to a general meeting. In such cases, the nominee should report voting rights applications to the VPC system (known as voting rights registrations). This can be done, either via a terminal or by file transfer. The nominee is responsible for this reporting. The routine for registering voting rights is described towards the end of this chapter.

The nominee has a securities account or securities accounts registered in the VPC system for those holdings that are nominee-registered. Nominees should report holdings in each VPC account via their AOs. This reporting can be done via one VPC account with holdings in the securities concerned.

### **Dividends on Swedish depository receipts and foreign shares**

Nominees have their nominee-registered holdings registered in one or more nominee accounts in the VPC system.

The VPC system makes it possible for a nominee to report holdings of those nominee-registered owners for whom reduced foreign tax is to be withheld.

The order file from VPC specifies the list type = 10 or 11. Holdings should be reported for each VPC account concerned. A reconciliation is made per VPC account and the results shown in a report to the nominee.

List type = 11 is specified in the order file from VPC if the dividend applies to American shares or to Swedish depository receipts related to American shares.

List type = 10 is specified in the order file when referring either to other foreign shares or to Swedish depository receipts related to other foreign shares.

### **Extra lottery draws on premium bond loans**

The right to participate in an extra lottery draw is conditional. One condition can be the size of the holding in one or more premium bond loan(s). On the record date for an extra lottery draw, those who are entitled to participate in the draw are allocated lottery rights, which are booked in the respective VPC accounts. See also chapter 8.

In order to ensure that the allocation of lottery rights for each nominee-registered owner is correct according to the particular terms of each extra lottery draw, the nominee is obliged to report to VPC the holdings in the loans concerned, distributed according to nominee account (VPC account) and owner. (Series and sequence numbers of these holdings cannot be reported).

The order file from VPC for this reporting has the list type = 12.

The booking of allocated lottery rights and the status reporting to nominees of how the allocation was distributed per nominee-registered owner is described in chapter 8.11.

History of the versions

<b>Date</b>	<b>Ver.</b>	<b>Description</b>
2004-05-18	1.0	New translation, published on <a href="http://www.vpc.se">www.vpc.se</a> .
2008-09-23	2.0	New transactions and files for handling of Voting Rights
		♦

## **4.2 Files concerning nominee reporting**

### **4.2.1 IFIF212 = Order from VPC**

See layout for - [IFIF2122](#)

The order from VPC has IFIF001 in the file header's ID-FILE-REPLY.

#### **Register of owners**

When ordering information for the compilation of public half-yearly registers of owners, nominees receive VPC's order in the morning 2 (two) bank days before record date. In the morning of the bank day after the record date for these lists, information is sent by fax of any securities that have been added between the time of the order and the record date.

When ordering information for the compilation of public registers of owners for individual issuers (usually the last bank day in each calendar month), nominees will also receive VPC's order in the morning 2 (two) bank days before the record date.

When ordering details for the production of name and address labels (LIST-TYPE=05), nominees receive VPC's order 1 (one) bank day before the record date.

As information to the nominee, the order report shows what type of list VPC is to produce on the instructions of the company (see "LIST-TYPE" in the catalogue of term definitions).

The order states, amongst other things, which security or securities are referred to and the record date (and in some cases, the scope. See "ANNUAL-REP" below).

The order consists of one record for each security concerned.

The material must always comprise all owners of the required securities, with a few exceptions.

If the field ANNUAL-REPORT = J in the order file, only those shareholders who have indicated that they wish to receive the annual report should be included.

Orders relating to LABELS or NOMINEE-LISTS can be transmitted on the same day from VPC, but they always apply to different record dates.

### **Dividends on Swedish depository receipts and foreign shares**

Prior to a dividend on a foreign security, the nominee receives the order file 3 (three) bank days before the record date.

The order consists of one record for each security concerned.

If LIST-TYPE = 10 in the order file, only those beneficial owners who qualify for reduced foreign tax should be reported. The nominee can, however, choose to report all beneficial owners and let the VPC system calculate the holdings that qualify for reduced tax. In this case, however, the nominee has no control over which owners will be calculated as qualifying for reduced foreign tax. It is therefore essential that the holdings are reported for the correct VPC account and that the fiscal domicile is specified in the field ID-COUNTRY.

Where LIST-TYPE = 11 occurs in the order file, the nominee's QI status (Qualified Intermediary) determines the need to report nominee-registered owners.

The following QI-status alternatives are processed in the VPC system:

- QI with primary NRA withholding and with US responsibility
- QI with primary NRA withholding and without US responsibility
- QI without primary NRA withholding and with US responsibility
- QI without primary NRA withholding and without US responsibility
- Non-QI

*NRA withholding* means that the nominee assumes primary withholding responsibility for American tax for beneficial owners that do not have the US as their fiscal domicile.

*US responsibility* means that the nominee is responsible for backup withholding and the annual reporting of US persons with TIN.

*US persons* means beneficial owners with the US as their fiscal domicile.

*TIN* stands for Taxpayer Identification Number, which should be 9 digits or blank.

For a US person, it is possible to report B or C notice using the code *B-/C-notice/Exempt*.

The code *B-/C-notice/Exempt* consists of one position with valid values blank, B, C or E.

*Blank* means neither B-/C-notice nor Exempt.

*B-notice* means that backup withholding of American tax is to be applied to a US person because of an incorrect TIN.

*C-notice* means that backup withholding of American tax is to be applied to a US person because of a previously ambiguous tax situation.

It is possible for an investor to report tax exemption (*Exempt*) by reporting E as the value of the code *B-/C-notice/Exempt*

#### *Reporting rules for different types of QI status*

A nominee that has the status “QI with primary NRA withholding and with US responsibility” only needs to report the holdings of a US person without TIN to VPC for forwarding to the American custodian bank to handle the American taxation.

A nominee that has the status “QI with primary NRA withholding without US responsibility” should not have any US persons with TIN in their custody. If such nominee has US persons without TIN, these should be reported to VPC for forwarding to the American custodian bank to handle the American taxation. US persons with TIN will be processed in the same way as US persons without TIN.

A nominee that has the status “QI without primary NRA withholding and with US responsibility” must report those beneficial owners that qualify for reduced American tax, provided that the fiscal domicile in question is specified in the dividend order. If the nominee has US persons without TIN, these should be reported to VPC for forwarding to the American custodian bank to handle the American taxation. It is essential that the holdings are reported for the correct VPC account and that the fiscal domicile is specified in the field ID-COUNTRY. In cases where too large a holding is reported, the allocation of tax rates for the holdings reported will begin with the highest tax rate followed by rates in a descending order as long as the holdings in the VPC account are sufficient.

A nominee that has the status “QI without primary NRA withholding and without US responsibility” must report those beneficial owners that qualify for reduced American tax, provided that the fiscal domicile in question is specified in the dividend order. Such nominee should not have any US persons with TIN in their custody. If the nominee has US persons without TIN, these should be reported to VPC for forwarding to the American custodian bank to handle the American taxation. Any holdings for US persons with TIN will also be dealt with as holdings for US persons without TIN. It is essential that the holdings are reported for the correct VPC account and that the fiscal domicile is specified in the field ID-COUNTRY. In cases where too large a holding is reported, the allocation of tax rates for the holdings reported will begin with the highest tax rate followed by rates in a descending order as long as the holdings in the VPC account are sufficient.

A nominee with the status “Non-QI”, should not report any holdings. Any reporting made by a Non-QI will be ignored when the dividend is calculated.

#### **Extra lottery draw on premium bond loans**

Before an extra lottery draw on premium bond loans, the nominee receives the order file 3 (three) bank days prior to the record date.

This order has list type = 12.

The order consists of one record for each premium bond loan that is included in the terms for the extra lottery draw. Information on the terms for the extra lottery draw can be obtained from the VPC system using transaction EPFD – Lottery rights premium loan, enquiry.

#### **4.2.2 IFIF001 = Nominee reporting**

When nominees have reconciled their balances with the information supplied by VPC in special reconciliation lists on the morning following record day, they should submit the material in batches to VPC via the network.

If orders concerning a number of different issuers are current, the replies to these should be sent under the same file header, provided they refer to the same DATE-RECORD.

If the replies refer to different record dates, they should be sent under separate file headers.

In order for VPC to be able to manage the final compilation as rationally and promptly as possible, it is necessary to be able to identify Swedish owners by a personal identification number or organisation identification number. In the case of non-Swedish owners, or other owners that for some reason lack such number, the digit “1” or “3” should be entered in the first position and the nominee’s own identification in the following 10 positions in the field ID-SECURITY-OWNER. See the Catalogue of Term Definitions.

The reporting from nominees should include only those securities ordered by VPC. These are identified by the ISIN (ID-SECURITY). The nominee account specified (ID-VP-ACCOUNT) must hold on record day at least one of the securities ordered.

## **Registers of owners**

In the case of larger compilations, such as half-yearly public lists of nominees, the material should be received by VPC no later than the first working Friday after the record date or 5 (five) bank days after record date.

For smaller compilations, such as a complete nominee list for a particular issuer, the material should be received by VPC no later than 3 (three) bank days after record date.

## **Dividends on Swedish depository receipts and foreign shares**

The material should be delivered to VPC no later than 3 (three) bank days after the record date.

In the case of list type = 10, the nominee determines for which beneficial owners reduced foreign tax is to be withheld by reporting to that effect.

In the case of list type = 11, it is the nominee's QI status that determines the need for reporting.

For a description of the different types of QI status, see 4.2.1 IFIF212 = Order from VPC, Dividends on Swedish depository receipts and foreign shares.

## **Extra lottery draw on premium bond loans**

The material should be received by VPC no later than 3 (three) bank days after the record date.

In the case of list type = 12, details of personal/organisation identification number, as well as holdings in the respective premium bond loans, must be specified for each nominee account. NOTE that it is essential that each holding is reported for the correct nominee account (VPC account).

### **4.2.2.1 Record types included**

#### **NOMINEE REPORTING, OWNER RECORD (RECORD TYPE 11)**

See layout for - [IFIF0012](#)

Note that postal code (ADDR-POSTALCODE) should not be filled in if a country code other than SE is given (foreign postal codes should be specified as part of ADDR-POSTAL-AREA). The address should be the owner's official residential address as stated in the nominee lists, and in the case of labels (LIST-TYPE=5 in the order file), where applicable, the address of guardian/representative/trustee.

#### **NOMINEE REPORTING, OWNER RECORD WITH SUPPLEMENTARY ADDRESS (RECORD TYPE 14)**

See layout for - [IFIF0014](#)

This record type is used instead of record type 11 whenever any c/o address is reported separately in the transactions. Record type 14 can also be used for all owner records in which details of c/o address is left blank, or where such details are lacking.

#### **NOMINEE REPORTING, RECORD OF HOLDINGS (RECORD TYPE 12)**

See layout for - [IFIF0013](#)

A delivery always consists of an introductory file header (see chapter 3). After that, the first owner record follows and then one or more record(s) of holdings, then a second owner record, followed by this owner's record(s) of holdings, etc. The records should be sorted with nominee account number (VPC account).

## **4.2.3 Reconciliation of nominee material**

The file or files that each nominee sends in to VPC is/are reconciled with the nominee accounts of that same nominee. The reconciliation is made for each nominee account and a reconciliation list is printed for each nominee. The list shows the number of securities holdings delivered and the balance for the corresponding securities holdings, both per each nominee's VPC account and in total. The list can be accessed for printout from the nominee's own printer, using transaction ZLVI.

In the case of those securities where there is a discrepancy between the delivery from the nominee and the balance in the VPC register, the nominee can make adjustments via the reconciliation and adjustment system, using the transactions that are displayed in the menu that is accessed by transaction IFAZ.

#### **Dividends on Swedish depository receipts and foreign shares**

The holdings received for each owner are reconciled per nominee account. It is essential that the reporting is made to the correct nominee account. A reconciliation list, "Fördelning utländsk skatt (Allocation of foreign tax)", UDAL541, showing reported holdings and allocated holdings, is printed for each VPC account and nominee after the termination of the reporting period (3 bank days). The list can be accessed for printout on the nominee's own printer via transaction ZLVI.

During the reporting period, nominees can make adjustments to the reported holdings via the reconciliation and adjustment system, using the transactions that are displayed in the menu accessed using transaction IFAZ.

#### **4.2.4 Reporting of joint owners, etc**

Most nominees today administer custodian accounts for joint owners. Nominees should report the representative of the joint account as owner. If the representative, in addition, has securities of his/her own, the joint owner should instead, to avoid any intermingling, be reported as is described for foreign owners in the section above, "Nominee reporting".

### **4.3 Files concerning Voting Rights**

#### **4.3.1 IFRF042 = Reconciliation of reported voting rights, reconciliation report**

The report can be ordered via transaction IRBU(see below). The report displays all voting rights registered by the nominee.

##### **FILE HEADER**

See layout for – [IFRF0421](#)

##### **DETAIL-RECORD**

See layout for – [IFRF0422](#)

The record type is depending on the requested sorting order of the detail-records (which is done in transaction IRBU).

Record type '01' name order

Record type '02' Pers.no/Org.no/Fict.no order

Record type '03' Registration order.

#### **4.3.2 IFSF142 = Rejected Voting Rights**

The report is produced at closing on record date in the case when a nominee has reported a number of voting rights which exceeds the posted holdings at closing. The file corresponds to the report IFSL1411.

##### **FILE HEADER**

See layout for – [IFSF1421](#)

##### **DETAIL-RECORD**

See layout for – [IFSF1422](#)

## 4.4 Registration of voting rights for nominee-registered shares

Security holders who have chosen to register their holdings with a nominee do not have the right to participate in a general meeting unless their security holdings have been entered in the register of shareholders. Security holders who wish to participate in the general meeting must therefore temporarily register themselves as owner of their holdings in the company in question.

The purpose of the voting rights procedure is for VPC to receive and store voting rights registrations from authorised nominees. The procedure relies on each nominee being able to transfer information, via terminal or file transfer, about those owners that have registered their voting rights and their holdings.

### 4.4.1 Reporting

Voting rights are stored in a temporary register for those companies that are in the process of printing out a register of shareholders. Nominees can report new additions, changes or removals of the voting rights entries via terminal or file transfer. Each nominee may only view and alter their own voting rights registrations.

Reporting is possible as soon as the voting rights routine has been opened. The voting rights system normally opens the routine 30 days before the annual general meeting is due to take place and 14 days for an extraordinary general meeting. Shorter periods of time can occur in those cases where VPC has not received in good time confirmation from the company of a definite date for the general meeting or where two general meetings take place in close succession. Registrations are possible up to record date at the time when terminal traffic is closed.

Voting rights are reported per nominee, issuer, record date, security type, security sort and owner.

Incorrect information will be rejected.

### 4.4.2 New entry/update of voting rights

An AO may register voting rights via terminal or file transfer for nominee-registered owners that wish to be entered in the register of shareholders prior to a general meeting. Information concerning the owner and the holdings in a relevant security type/sort is registered. It is possible to make either a new entry or an update of an existing entry.

Registration is permissible as soon as the voting rights routine opens and up to the record date at the time when the routine closes for reporting.

There are two different transactions for the registration of voting rights, one for owners with a fictitious personal/organisation identification number and one for owners with an authentic Swedish personal/organisation identification number. The only difference between these two transactions is the validation of the personal/organisation identification number.

#### 4.4.2.1 IRPU = Registration of voting rights with Swedish personal/org id no.

See layouts for - IRPU

To VPC [IFRF120I](#)  
From VPC [IFRF120O](#)

#### To VPC

The field in the transaction header must contain the following values.

ID-SEARCH-CODE blank  
CODE-ACTION NY or UP

#### 4.4.2.2 IRFU = Registration of voting rights with fictitious identification no.

See layouts for - IRFU

To VPC [IFRF110I](#)  
From VPC [IFRF110O](#)

#### **To VPC**

The field in the transaction header must contain the following values.

ID-SEARCH-CODE    blank  
CODE-ACTION        NY or UP

For foreign owners who lack a correct Swedish personal/organisation identification number, the nominee's internal number may be used instead. No formal validation of personal/organisation number is made.

### **4.4.3 Removal of voting rights**

An AO can use a terminal or file transfer to remove voting rights that have previously been reported. Two different transactions are used – one for owners with a fictitious personal/organisation identification number and one for owners with a Swedish personal/organisation identification number.

Registration is permissible as soon as the voting rights routine opens and up to the record date at the time when the routine closes.

#### **4.4.3.1 IRPB = Removal of voting rights with Swedish personal/org id no.**

See layouts for - IRPB

**To VPC**            [IFRF140I](#)  
**From VPC**        [IFRF140O](#)

#### **To VPC**

The field in the transaction header must contain the following values.

ID-SEARCH-CODE    blank  
CODE-ACTION        BT

#### **4.4.3.2 IRFB = Removal of voting rights with fictitious identification no.**

See layouts for - IRFB

**To VPC**            [IFRF130I](#)  
**From VPC**        [IFRF130O](#)

#### **To VPC**

The field in the transaction header must contain the following values.

ID-SEARCH-CODE    blank  
CODE-ACTION        BT

## **4.5 Follow up of registered voting rights for nominee-registered shares**

Following transactions support the voting right routine.

### **4.5.1 Monitoring**

The nominee can monitor upcoming general meetings reported to VPC via two transactions, VFBD and IRAL.

#### **4.5.1.1 VFBD = General meeting of shareholders, Enquiry**

VFBD displays the general meeting last registered in VPC, which can be a date of a general meeting in the future or in the past. It is possible to apply a general meeting date in the search key of an enquiry to explore if the voting right routine is open for a certain company on a certain date. VFBD is updated when a new general meeting is reported to VPC or when voting right routine change status, for example when the voting routine opens.

See layouts for - VFBD

**To VPC**            [VPVF030I](#)  
**From VPC**        [VPVF030O](#)

#### **To VPC**

The field in the transaction header must contain the following values.

ID-SEARCH-CODE	NAME-ISSUING-COMPANY-MNEM (,DATE-RECORD)
CODE-ACTION	blank

#### **4.5.1.2 IRAL = Record dates, list**

An AO may make an enquiry via terminal or file transfer to the voting rights register about which companies are open for registration of voting rights.

See layouts for - IRAL

<b>To VPC</b>	<a href="#">IFRF170I</a>
<b>From VPC</b>	<a href="#">IFRF170O</a>

#### **To VPC**

The field in the transaction header must contain the following values.

ID-SEARCH-CODE	ID-NOMINEE (,DATE-RECORD)
CODE-ACTION	blank

### **4.5.2 Reconciliation of reported voting rights**

Reconciliation is made per nominee and not per nominee account.

At the time of reconciliation, the sum of registered voting rights is checked against the nominee's total holdings in the main register. Only posted holdings in the main register are used for the reconciliation.

In the case of those nominees that have reported too large a quantity in comparison with the posted quantity in the total balance, only those records that were reported up to the quantity that is posted will be included.

The system picks the transactions in the order they have been registered.

Other transactions are excluded.

The report 'Reported voting rights, reconciliation report' is ordered from transaction IRBU (Voting rights – Order reconciliation report, see below for transaction details).

The report is delivered as either a list or a file. The list IFRL041 can be accessed for printout from the nominee's own printer, using transaction ZLVI. The file IFRF042 can be accessed for further processing using file transfer, see layout above.

#### **4.5.2.1 IRAF = Reconciliation Voting Rights, List**

IRAF displays posted holdings, number of reported voting rights and balance. The transaction enables automated intraday reconciliation up to and including the record date. Posted holdings are updated after each equity market settlement and the number of registered voting rights is updated after each registration made by the nominee.

See layouts for - IRAF

<b>To VPC</b>	<a href="#">IFRF160I</a>
<b>From VPC</b>	<a href="#">IFRF160O</a>

#### **To VPC**

The field in the transaction header must contain the following values.

ID-SEARCH-CODE	ID-NOMINEE, NAME-ISSUING-COMPANY-MNEM (, ID-SEC-TYPE, DES-SEC-SORT)
CODE-ACTION	blank

