

**Documentation on the creation of notifications  
of major holdings (section 33 *et seq.* of the  
German Securities Trading Act  
(*Wertpapierhandelsgesetz – WpHG*))  
in XML format**

**Documentation and instructions**

**As of: 24 September 2018**

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## **1 Introduction**

The Federal Financial Supervisory Authority (*Bundesanstalt für Finanzdienstleistungsaufsicht* – BaFin) provides three different reporting channels for the transmission of notifications of voting rights and financial instruments in accordance with section 33 *et seq.* WpHG:

- (1) Submitting the report manually using a form on the “Reporting and Publishing Platform (MVP Portal)”.
- (2) Uploading an XML file via the MVP Portal.
- (3) Uploading a report via the SOAP web service.

If reporting channel (2) or (3) is used, the format which is to be transmitted is subject to strict formal requirements which are specified by means of an XML Schema Definition (XSD). Reporting companies can access the key XSD file for the purposes of this document via the following URL: <https://portal.mvp.bafin.de:444/services/ws/eus.xsd2.xsd>.

These XSD specifications must be taken into consideration where an XML-format report is created and also when the web service is used. The following documentation is provided as guidance.

When a report is submitted through the SOAP web service, the XML block specified by means of the above-mentioned XSD file is embedded in a SOAP message. The document referred to in the following section [MVP-SOAP] provides information on the format for this embedding. No further details are provided here.

### **1.1 Relevant documents**

- [MVP-XML]: “Reporting and Publishing Platform (MVP Portal) –XML Upload”
- [MVP-SOAP]: “Reporting and Publishing Platform (MVP Portal) – SOAP Web Service”

[MVP-XML] and [MVP-SOAP] provide general information on how to upload an XML file and on the use of web services to submit reports. The latter are available in the “MVP Portal” section of BaFin’s website, under “Manuals”.

## **2 Overview**

A notification of major holdings of voting rights and financial instruments in XML format consists of five main sections:

- (a) a choice of language, determining the language of the report
- (b) a header indicating whether this is a new notification of major holdings or the correction of a previously transmitted notification of major holdings
- (c) the actual notification of major holdings comprising ten related blocks:
  - 1. Details of the issuer
  - 2. Reason for notification
  - 3. Details of the person subject to the notification obligation
  - 4. Names of shareholders
  - 5. Date on which threshold was crossed or reached
  - 6. Total positions
  - 7. Details of total positions
  - 8. Information relating to the person subject to the notification obligation
  - 9. In case of proxy voting pursuant to section 34 (3) of the WpHG
  - 10. Other information
- (d) date and signature
- (e) as well as an annex comprising three different blocks:
  - 1. Identity of the person subject to the notification obligation
  - 2. Identity of the notifier
  - 3. Other information

The choice of language (1) is not required in case of a manual report submitted through the MVP Portal, since various reporting forms are offered for the two possible form languages, German and English.

To aid understanding of the XML format, screenshots of the implemented German-language reporting form will be provided in the remainder of this documentation.

### 3 General XML structure for a report

The previous chapter provided an overview of the report contents. This chapter now shows how this general structure is represented in XML format.

Any reference to “types” in the following relates to the types of XSD files provided for this procedure, i.e. type definitions such as `<xsd:simpleType> ... </xsd:simpleType>` or `<xsd:complexType> ... <xsd:complexType>`. However, the element names rather than the type names are consistently provided in the XML examples. The relevant type information for the XSD files must be taken into consideration for the end nodes of the XML structure, i.e. the elements which are filled with the actual contents (text, numbers, times etc.). These are mentioned in this document for greater clarity.

**eus** is used in the following as a namespace code for the types provided for a voting rights notification.

#### 3.1 Basic element of an XML-based notification of major holdings

The basic element of an XML-based notification of major holdings is of the type **eusInType** and is designated by means of its element name **inEus**. Where a file is to be attached to the report, an additional `<datei>` element will follow the `<inEus>` element.

```
<inEus xmlns:eus="http://www.bafin.de/mvp/eus/">
  <!-- The actual report content in XML format. -->
</inEus>
<datei>
  <!-- The PDF document is entered here in base64-coded form
  as a character string. -->
</datei>
```

Any further details are provided within the `<inEus>` element. Please refer to the relevant [MVP-SOAP] section for further details on the use of file attachments. The `<datei>` element is not provided in the following examples.

### **3.2 Overview of the structure of the report contents**

The `<inEus></inEus>` element already outlined above consists of the above-mentioned five key sections as follows:

```
<inEus xmlns:eus="http://www.bafin.de/mvp/eus/">
  <eus:language>
    <!-- Choice of language -->
  </eus:language>
  <eus:heading>
    <!-- Notification of major holdings or correction? -->
  </eus:heading>
  <eus:notification>
    <!-- The ten key blocks of a notification of major holdings -->
    <eus:detailsOfIssuer></eus:detailsOfIssuer>
    <eus:reasonForNotification></eus:reasonForNotification>
    <eus:detailsOfPersonSubject></eus:detailsOfPersonSubject>
    <!-- The following block is optional. -->
    <eus:namesOfShareholders></eus:namesOfShareholders>
    <eus:dateThreshold></eus:dateThreshold>
    <eus:totalPositions></eus:totalPositions>
    <eus:detailsOnTotalPositions></eus:detailsOnTotalPositions>
    <eus:informationPersonSubject></eus:informationPersonSubject>
    <!-- The following two blocks are optional. -->
    <eus:proxyVoting></eus:proxyVoting>
    <eus:otherInformation></eus:otherInformation>
  </eus:notification>
  <eus:signing>
    <!-- Date and signature -->
  </eus:signing>
  <eus:annex>
    <!-- The three blocks of the annex -->
    <eus:annexIdentityPersonSubject></eus:annexIdentityPersonSubject>
    <!-- The following two blocks are optional. -->
    <eus:annexIdentityNotifier></eus:annexIdentityNotifier>
    <eus:annexOtherInformation></eus:annexOtherInformation>
  </eus:annex>
</inEus>
```

Further details on these five key sections are provided in the following chapters.



## **4 Choice of language**

As already mentioned above, when using the form for notifications of major holdings no explicit choice of language is required, since different forms are provided for the two languages German and English. In an XML report, this language information must be transmitted as follows:

```
<eus:language>de</eus:language>
```

or

```
<eus:language>en</eus:language>
```

## 5 Header

The header indicates whether this is a new notification of major holdings or the correction of a previous notification of major holdings. In case of a correction, the date for the previous notification of major holdings to which this correction relates must be specified.

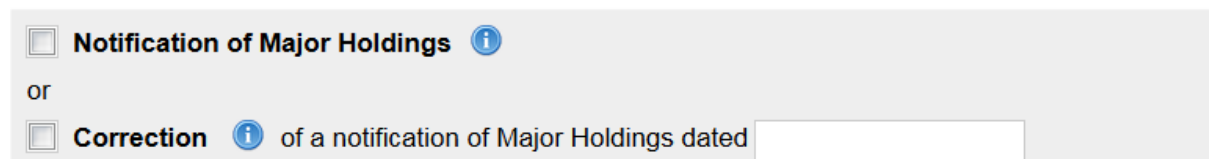
In case of a new notification of major holdings, this block will look like this:

```
<eus:heading>  
  <eus:notificationReport></eus:notificationReport>  
</eus:heading>
```

In case of a correction to a notification of major holdings, this changes to:

```
<eus:heading>  
  <eus:correctionReport>  
    <eus:notificationDate>  
      <!-- Date, 4-digit year  
           Example: 2018-05-24 -->  
    </eus:notificationDate>  
  </eus:correctionReport>  
</eus:heading>
```

In the form, this section will look like this:



**Notification of Major Holdings** ⓘ

or

**Correction** ⓘ of a notification of Major Holdings dated

**Figure 1: Header**

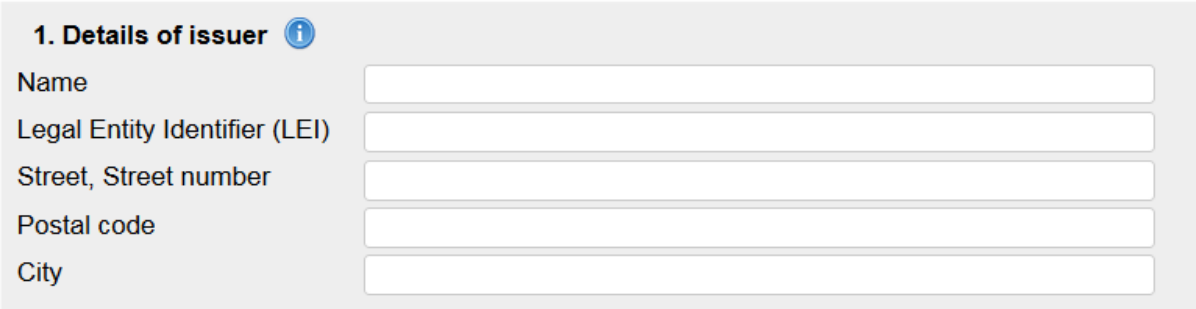
## 6 Actual notification of major holdings

The ten main blocks of a notification of major holdings which are included in the element `<eus:notification></eus:notification>` are described in detail as follows.

### 6.1 Details of the issuer (`detailsOfIssuer`)

```
<eus:detailsOfIssuer>
  <eus:name>
    <!-- Text, maximum of 200 characters -->
  </eus:name>
  <eus:lei>
    <!-- Text, maximum of 20 characters -->
  </eus:lei>
  <eus:streetAndNumber>
    <!-- Text, maximum of 120 characters -->
  </eus:streetAndNumber>
  <eus:postalCode>
    <!-- Optional text, maximum of 15 characters -->
  </eus:postalCode>
  <eus:city>
    <!-- Optional text, maximum of 80 characters -->
  </eus:city>
</eus:detailsOfIssuer>
```

In the form, this section will look like this:



**1. Details of issuer** ⓘ

Name	<input type="text"/>
Legal Entity Identifier (LEI)	<input type="text"/>
Street, Street number	<input type="text"/>
Postal code	<input type="text"/>
City	<input type="text"/>

**Figure 2: Details of the issuer**

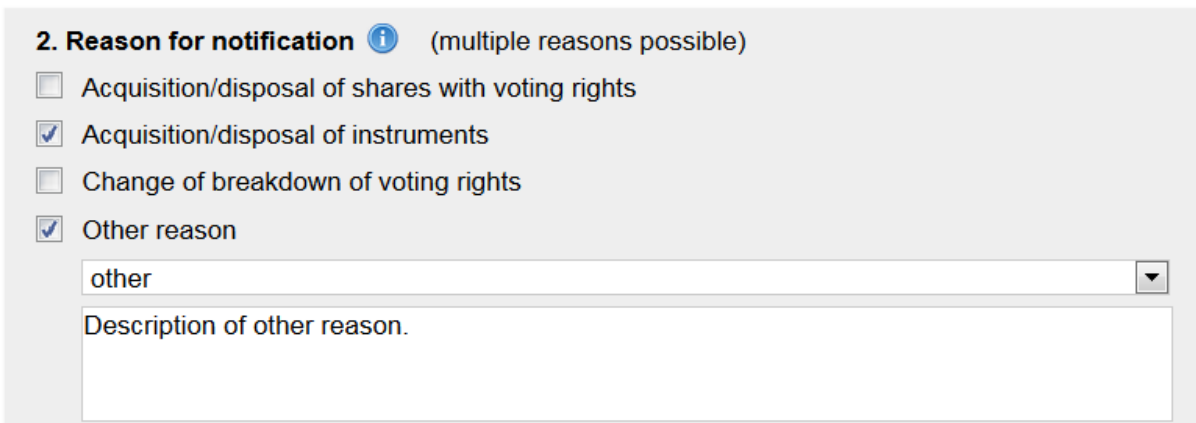
## 6.2 Reason for notification (`reasonForNotification`)

```
<eus:reasonForNotification>
  <eus:acquisitionDisposalVotingRights>
</eus:acquisitionDisposalVotingRights>
  <eus:acquisitionDisposalInstruments>
</eus:acquisitionDisposalInstruments>
  <eus:changeOfBreakdown></eus:changeOfBreakdown>
  <eus:otherReason>
    <!-- Only one of the following elements -->
    <eus:firstTimeAdmissionOfShares>
</eus:firstTimeAdmissionOfShares>
    <eus:stockNotificationOfVotingRights>
</eus:stockNotificationOfVotingRights>
    <eus:voluntaryGroupNotification>
</eus:voluntaryGroupNotification>
    <eus:exerciseOfInstruments></eus:exerciseOfInstruments>
    <eus:actingInConcert></eus:actingInConcert>
    <eus:other>
      <!-- Text, maximum of 300 characters -->
    </eus:other>
  </eus:otherReason>
</eus:reasonForNotification>
```

At least one element must be specified within the element `<eus:reasonForNotification>`. However, it is also possible to specify more than one element (multiple selection).

If the element `<eus:otherReason>` is specified, only one element may be specified within this element (single selection).

The following is an example of what this form will look like:



**2. Reason for notification** ⓘ (multiple reasons possible)

Acquisition/disposal of shares with voting rights

Acquisition/disposal of instruments

Change of breakdown of voting rights

Other reason

other

Description of other reason.

Figure 3: Reason for notification

This example will look like this in XML notation:

```
<eus:reasonForNotification>
  <eus:acquisitionDisposalInstruments>
  </eus:acquisitionDisposalInstruments>
  <eus:otherReason>
    <eus:other>Description of other reason.</eus:other>
  </eus:otherReason>
</eus:reasonForNotification>
```

### **6.3 Details of the person subject to the notification obligation (detailsOfPersonSubject)**

The details of the person subject to the notification obligation comprise two different lists. At least one of these lists must be specified, with at least one content element:

```
<eus:detailsOfPersonSubject>
  <!-- At least one of the two following lists -->
  <eus:naturalPersonList>
    ...
  </eus:naturalPersonList>
  <eus:legalEntityList>
    ...
  </eus:legalEntityList>
</eus:detailsOfPersonSubject>
```

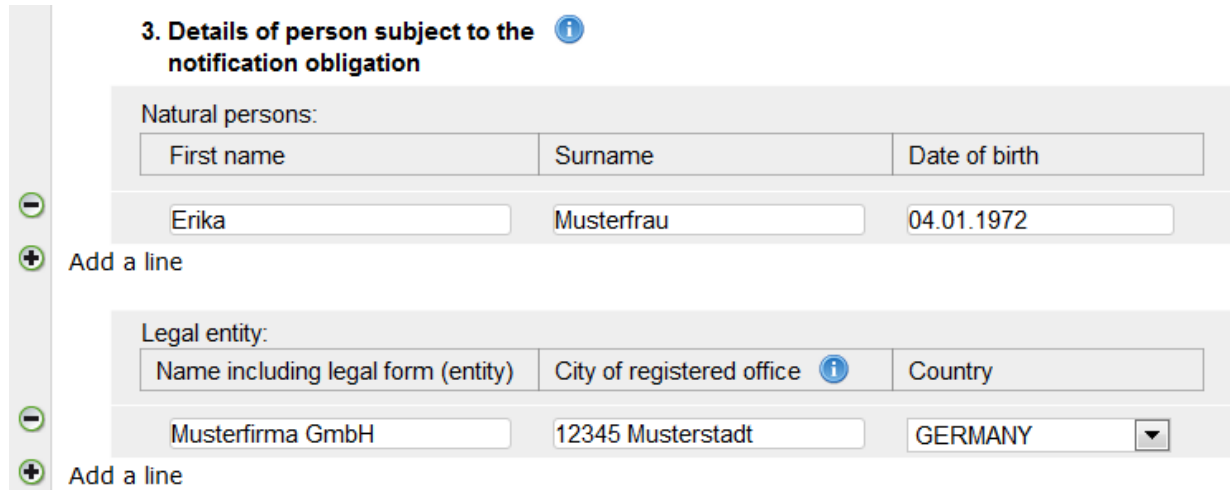
An entry in `<eus:naturalPersonList>` will look like this:

```
<eus:naturalPerson>
  <eus:firstName>
    <!-- Text, maximum of 50 characters -->
  </eus:firstName>
  <eus:surname>
    <!-- Text, maximum of 200 characters -->
  </eus:surname>
  <eus:dateOfBirth>
    <!-- Date, 4-digit year
    Example: 2018-05-24 -->
  </eus:dateOfBirth>
</eus:naturalPerson>
```

And an entry in `<eus:legalEntityList>` will look like this:

```
<eus:legalEntity>
  <eus:name>
    <!-- Text, maximum of 200 characters -->
  </eus:name>
  <eus:cityOfRegisteredOffice>
    <!-- Text, maximum of 80 characters -->
  </eus:cityOfRegisteredOffice>
  <eus:country>
    <!-- Two-digit country code -->
  </eus:country>
</eus:legalEntity>
```

The following is a sample form, with one entry in the list of natural persons and one entry in the list of legal entities:



**3. Details of person subject to the notification obligation** ⓘ

Natural persons:

First name	Surname	Date of birth
Erika	Musterfrau	04.01.1972

⊖ Add a line ⊕

Legal entity:

Name including legal form (entity)	City of registered office ⓘ	Country
Musterfirma GmbH	12345 Musterstadt	GERMANY ▾

⊖ Add a line ⊕

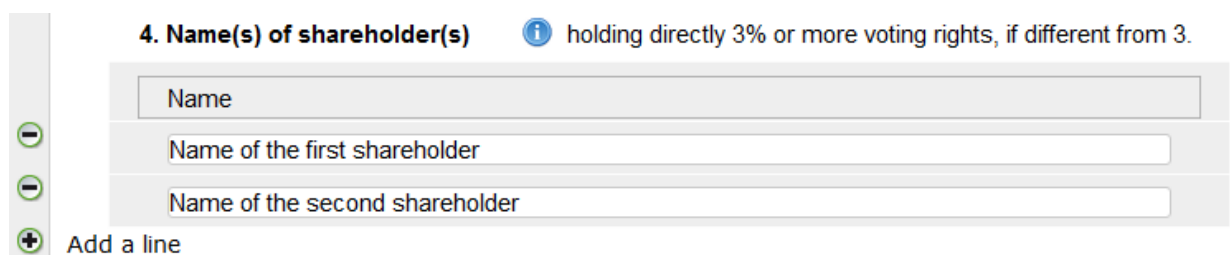
Figure 4: Details of the person subject to the notification obligation

#### 6.4 Names of shareholders (`namesOfShareholders`)

The names of the shareholders are an optional list of simple text contents. A maximum of 1000 name entries may be provided. In the following example, two shareholder names are specified:

```
<eus:namesOfShareholders>  
  <eus:name>Name of the first shareholder</eus:name>  
  <eus:name>Name of the second shareholder</eus:name>  
</eus:namesOfShareholders>
```

This example will look like this in the form:



**4. Name(s) of shareholder(s)** ⓘ holding directly 3% or more voting rights, if different from 3.

Name
Name of the first shareholder
Name of the second shareholder

⊖ Add a line ⊕

Figure 5: Names of shareholders

## **6.5 Date on which threshold was crossed or reached (`dateThreshold`)**

The date on which the threshold was crossed or reached is a simple date element:

```
<eus:dateThreshold>  
  <!-- Date, 4-digit year  
       Example: 2018-05-24 -->  
</eus:dateThreshold>
```

In the form, this will look like this:

### **5. Date on which threshold was crossed or reached**



**Figure 6: Date on which threshold was crossed or reached**

## 6.6 Total positions (`totalPositions`)

The details of the total positions of voting rights and financial instruments comprise six percentage values and one absolute value. The basic structure is as follows:

```
<eus:totalPositions>
  <eus:new>
    <eus:percentageVotingRightsShares>
      <!-- Percentage value up to 100,
           max. 12 digits after the decimal point -->
    </eus:percentageVotingRightsShares>
    <eus:percentageVotingRightsInstruments>
      <!-- Percentage value up to 100,
           max. 12 digits after the decimal point -->
    </eus:percentageVotingRightsInstruments>
    <eus:percentageTotalOfBoth>
      <!-- Percentage value up to 100,
           max. 12 digits after the decimal point -->
    </eus:percentageTotalOfBoth>
    <eus:totalNumberOfVotingRights>
      <!-- Absolute value up to max. 1000000000000 -->
    </eus:totalNumberOfVotingRights>
  </eus:new>
  <eus:previousNotification>
    <eus:percentageVotingRightsShares>
      <!-- Percentage value up to 100,
           max. 12 digits after the decimal point,
           alternatively "n/a" -->
    </eus:percentageVotingRightsShares>
    <eus:percentageVotingRightsInstruments>
      <!-- Percentage value up to 100,
           max. 12 digits after the decimal point,
           alternatively "n/a" -->
    </eus:percentageVotingRightsInstruments>
    <eus:percentageTotalOfBoth>
      <!-- Percentage value up to 100,
           max. 12 digits after the decimal point,
           alternatively "n/a" -->
    </eus:percentageTotalOfBoth>
  </eus:previousNotification>
</eus:totalPositions>
```

The form view illustrates this structure:

	% of voting rights attached to shares (total of 7.a.)	% of voting rights through instruments (total of 7.b.1. + 7.b.2.)	Total of both in % (7.a. + 7.b.)	Total number of voting rights pursuant to Sec. 41 WpHG 
New	0,00 %	0,00 %	0,00 %	<input type="text"/>
Previous notification (if applicable) 	<input type="text"/> %	<input type="text"/> %	<input type="text"/> %	-

**Figure 7: Total positions**



While the form offers automatic calculation of the percentage values in the first line of the table, for the XML report the person submitting the report must calculate all of the values and transmit them as part of the relevant elements. This also applies for all further fields calculated in form sections 7.a, 7.b.1 and 7.b.2.

Please note that the elements in the second line may not be omitted in the absence of a “previous notification”. The character string “n/a” will then be entered in the element in place of percentage values.

## **6.7 Details of total positions (`detailsOnTotalPositions`)**

The notified details are divided into three blocks. Each of these blocks consists of a list and a totals element. The totals element comprises an absolute value and a percentage value. The structure looks like this:

```
<eus:detailsOnTotalPositions>
  <eus:votingRights>
    <eus:votingRightsList>
      <!-- see below -->
    </eus:votingRightsList>
    <eus:total>
      <eus:absolute>
        <!-- Absolute value up to max. 1000000000000 -->
      </eus:absolute>
      <eus:percentage>
        <!-- Percentage value between 0 and 100,
          max. 12 digits after the decimal point -->
      </eus:percentage>
    </eus:total>
  </eus:votingRights>
  <eus:instruments1>
    <eus:instrument1List>
      <!-- see below -->
    </eus:instrument1List>
    <eus:total>
      <eus:absolute>
        <!-- Absolute value up to max. 1000000000000 -->
      </eus:absolute>
      <eus:percentage>
        <!-- Percentage value between 0 and 100,
          max. 12 digits after the decimal point -->
      </eus:percentage>
    </eus:total>
  </eus:instruments1>
  <eus:instruments2>
    <eus:instrument2List>
      <!-- see below -->
    </eus:instrument2List>
    <eus:total>
      <eus:absolute>
        <!-- Absolute value up to max. 1000000000000 -->
      </eus:absolute>
      <eus:percentage>
        <!-- Percentage value between 0 and 100,
          max. 12 digits after the decimal point -->
      </eus:percentage>
    </eus:total>
  </eus:instruments2>
</eus:detailsOnTotalPositions>
```

The `<eus:votingRightsList>` is divided as follows:

```
<eus:votingRightsList>
  <!-- Maximum of 1000 entries in the list-->
  <eus:votingRightsElement>
    <eus:isin>
      <!-- Optional, one max. 12-digit character string -->
    </eus:isin>
    <eus:absoluteDirect>
      <!-- Absolute value up to max. 1000000000000 -->
    </eus:absoluteDirect>
    <eus:absoluteIndirect>
      <!-- Absolute value up to max. 1000000000000 -->
    </eus:absoluteIndirect>
    <eus:percentageDirect>
      <!-- Percentage value between 0 and 100,
            max. 12 digits after the decimal point -->
    </eus:percentageDirect>
    <eus:percentageIndirect>
      <!-- Percentage value between 0 and 100,
            max. 12 digits after the decimal point -->
    </eus:percentageIndirect>
  </eus:votingRightsElement>
</eus:votingRightsList>
```

The `<eus:instrument1List>` is divided as follows:

```
<eus:instrument1List>
  <!-- Maximum of 1000 entries in the list-->
  <eus:instrument1Element>
    <eus:typeOfInstrument>
      <!-- Optional, one max. 50-digit character string -->
    </eus:typeOfInstrument>
    <eus:expirationOrMaturityDate>
      <!-- Optional, one max. 30-digit character string -->
    </eus:expirationOrMaturityDate>
    <eus:exerciseOrConversionPeriod>
      <!-- Optional, one max. 30-digit character string -->
    </eus:exerciseOrConversionPeriod>
    <eus:votingRightsAbsolute>
      <!-- Absolute value up to max. 1000000000000 -->
    </eus:votingRightsAbsolute>
    <eus:votingRightsPercentage>
      <!-- Percentage value between 0 and 100, max. 12
            digits after the decimal point -->
    </eus:votingRightsPercentage>
  </eus:instrument1Element>
</eus:instrument1List>
```




The `<eus:instrument2List>` is divided as follows:


```
<eus:instrument2List>
  <!-- Maximum of 1000 entries in the list-->
  <eus:instrument2Element>
    <eus:typeOfInstrument>
      <!-- Optional, one max. 50-digit character string -->
    </eus:typeOfInstrument>
    <eus:expirationOrMaturityDate>
      <!-- Optional, one max. 30-digit character string -->
    </eus:expirationOrMaturityDate>
    <eus:exerciseOrConversionPeriod>
      <!-- Optional, one max. 30-digit character string -->
    </eus:exerciseOrConversionPeriod>
    <eus:cashOrPhysicalSettlement>
      <!-- Optional, one max. 30-digit character string -->
    </eus:cashOrPhysicalSettlement>
    <eus:votingRightsAbsolute>
      <!-- Absolute value up to max. 1000000000000 -->
    </eus:votingRightsAbsolute>
    <eus:votingRightsPercentage>
      <!-- Percentage value between 0 and 100, max. 12
           digits after the decimal point -->
    </eus:votingRightsPercentage>
  </eus:instrument2Element>
</eus:instrument2List>
```

In the form view, this section (in this case, with 0 entries for the absolute and percentage values and with precisely one element in each list) looks like this:


**7. Details on total positions**


**a. Voting rights attached to shares (Sec. 33, 34 WpHG)**


ISIN 	Absolute 		In % 	
	Direct (Sec. 33 WpHG)	Indirect (Sec. 34 WpHG)	Direct (Sec. 33 WpHG)	Indirect (Sec. 34 WpHG)
<input type="text"/>	0 <input type="text"/>	0 <input type="text"/>	0,00 <input type="text"/> %	0,00 <input type="text"/> %

 Add a line


<b>Total</b>	0 <input type="text"/>	0,00 <input type="text"/> %
--------------	------------------------	-----------------------------


**b.1. Instruments according to Sec. 38 (1) no. 1 WpHG **


Type of instrument	Expiration or maturity date	Exercise or conversion period	Voting rights absolute	Voting rights in % 
<input type="text"/>	<input type="text"/>	<input type="text"/>	0 <input type="text"/>	0,00 <input type="text"/> %

 Add a line

	Voting rights absolute	Voting rights in %
<b>Total</b>	0 <input type="text"/>	0,00 <input type="text"/> %

**b.2. Instruments according to Sec. 38 (1) no. 2 WpHG **

Type of instrument	Expiration or maturity date	Exercise or conversion period	Cash or physical settlement	Voting rights absolute	Voting rights in % 
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	0 <input type="text"/>	0,00 <input type="text"/> %

 Add a line

	Voting rights absolute	Voting rights in %
<b>Total</b>	0 <input type="text"/>	0,00 <input type="text"/> %

Figure 8: Details of total positions

## 6.8 Information relating to the person subject to the notification obligation (`informationPersonSubject`)


Initially, one of two possible elements must be selected for the information relating to the person subject to the notification obligation. Depending on this selection, further elements may – and must – then be specified.


The simplest possible structure for this section is as follows:

```
<eus:informationPersonSubject>
  <eus:notControlledNorControlling>
</eus:informationPersonSubject>
```

In the form view, this corresponds to the following selection:

### 8. Information in relation to the person subject to the notification obligation (please tick the applicable box)

- Person subject to the notification obligation (3.) is not controlled nor does it control any other undertaking(s) holding directly or indirectly an interest in the (underlying) issuer (1.).
- Full chain of controlled undertakings starting with the ultimate controlling natural person or legal entity (in case of more than 4 please always provide only to BaFin also an organizational chart). 

Upload of organisational chart: 

*The filename may contain only characters from a/A to z/Z or one of the characters "\_", "." or "-". The maximum length is 50 characters. Blanks or umlauts may not be used.*

Name	% of voting rights (if at least held 3% or more)	% of voting rights through instruments (if at least held 5% or more)	Total of both (if at least held 5% or more)

Figure 9: Information relating to the person subject to the notification obligation (1)

However, instead of the element `<eus:notControlledNorControlling>`, which means that the first checkbox in the form view will be ticked, the element `<eus:fullChainOfControlledUndertakings>` can also be specified. In this case, the second checkbox will be ticked and the additional information which is required for this purpose will be provided.

The following is an example of `<eus:fullChainOfControlledUndertakings>`, with a file name indicated:


```
<eus:informationPersonSubject>
  <eus:fullChainOfControlledUndertakings>
    <!-- Minimum of 5 and maximum of 1000 of the following elements -->
    <!-- Only 5 elements are provided here by way of an example.
    They represent two strings -->
    <eus:controlledUndertaking>
      <eus:name>Name 1</eus:name>
      <eus:percentageVotingRights>
        <!-- Percentage value between 0 and 100,
        max. 2 digits after the decimal point -->
      </eus:percentageVotingRights>
      <eus:percentageInstruments>
        <!-- Percentage value between 0 and 100,
        max. 2 digits after the decimal point -->
      </eus:percentageInstruments>
      <eus:totalOfBoth>
        <!-- Percentage value between 0 and 100,
        max. 2 digits after the decimal point -->
      </eus:totalOfBoth>
    </eus:controlledUndertaking>
    <eus:controlledUndertaking>
      <eus:name>Name 2</eus:name>
      <eus:percentageVotingRights></eus:percentageVotingRights>
      <eus:percentageInstruments></eus:percentageInstruments>
      <eus:totalOfBoth></eus:totalOfBoth>
    </eus:controlledUndertaking>


    <!-- The hyphen delimits different strings -->
    <eus:controlledUndertaking>
      <eus:name>-</eus:name>
      <eus:percentageVotingRights></eus:percentageVotingRights>
      <eus:percentageInstruments></eus:percentageInstruments>
      <eus:totalOfBoth></eus:totalOfBoth>
    </eus:controlledUndertaking>

    <eus:controlledUndertaking>
      <eus:name>Name 1</eus:name>
      <eus:percentageVotingRights></eus:percentageVotingRights>
      <eus:percentageInstruments></eus:percentageInstruments>
      <eus:totalOfBoth></eus:totalOfBoth>
    </eus:controlledUndertaking>
    <eus:controlledUndertaking>
      <eus:name>Name 3</eus:name>
      <eus:percentageVotingRights></eus:percentageVotingRights>
      <eus:percentageInstruments></eus:percentageInstruments>
      <eus:totalOfBoth></eus:totalOfBoth>
    </eus:controlledUndertaking>
  </eus:fullChainOfControlledUndertakings>
  <eus:organizationalChartFilename>EUS-Testdatei.pdf
  </eus:organizationalChartFilename>
</eus:informationPersonSubject>
```

This will look like this in the form view:

Person subject to the notification obligation (3.) is not controlled nor does it control any other undertaking(s) holding directly or indirectly an interest in the (underlying) issuer (1.).

Full chain of controlled undertakings starting with the ultimate controlling natural person or legal entity (in case of more than 4 please always provide only to BaFin also an organizational chart). 

Upload of organisational chart: 

*The filename may contain only characters from a/A to z/Z or one of the characters "\_", "." or "-". The maximum length is 50 characters. Blanks or umlauts may not be used.*

Name	% of voting rights (if at least held 3% or more)	% of voting rights through instruments (if at least held 5% or more)	Total of both (if at least held 5% or more)
<input type="text" value="Name 1"/>	<input type="text" value=""/> %	<input type="text" value=""/> %	<input type="text" value=""/> %
<input type="text" value="Name 2"/>	<input type="text" value=""/> %	<input type="text" value=""/> %	<input type="text" value=""/> %
<input type="text" value="-"/>	<input type="text" value=""/> %	<input type="text" value=""/> %	<input type="text" value=""/> %
<input type="text" value="Name 1"/>	<input type="text" value=""/> %	<input type="text" value=""/> %	<input type="text" value=""/> %
<input type="text" value="Name 3"/>	<input type="text" value=""/> %	<input type="text" value=""/> %	<input type="text" value=""/> %

Figure 10: Information relating to the person subject to the notification obligation (2)

### 6.9 In case of proxy voting pursuant to section 34 (3) of the WpHG (proxyVoting)

This section is optional, and all of the elements included in it are also optional. In the following example, all of the elements will be transmitted:

```
<eus:proxyVoting>
  <eus:dateOfGeneralMeeting>2018-05-24</eus:dateOfGeneralMeeting>

  <!-- All of the following percentage values are values
        between 0 and 100, with max. 12 digits after the decimal point -->
  <eus:percentageVotingRightsShares>5</eus:percentageVotingRightsShares>
  <eus:percentageVotingRightsInstruments>7</eus:percentageVotingRightsInstruments>
  <eus:totalOfBoth>12</eus:totalOfBoth>
</eus:proxyVoting>
```



This example will look like this in the form view:

**9. In case of proxy voting according to Sec. 34 (3) WpHG**

(only in case of attribution of voting rights in accordance with Sec. 34 (1) sent. 1 no. 6 WpHG)

Date of general meeting	<input type="text" value="24.05.2018"/>	
Total positions (6.) after general meeting		
% of voting rights attached to shares	% of voting rights through instruments	Total of both
<input type="text" value="5"/> %	<input type="text" value="7"/> %	<input type="text" value="12"/> %

Figure 11: In case of proxy voting pursuant to section 34 (3) of the WpHG

**6.10 Other information (otherInformation)**

An optional, simple text element:

```
<!-- Text, maximum of 400 characters -->  
<eus:otherInformation>My text</eus:otherInformation>
```

In the form view:

**10. Other useful information**

<input type="text" value="My text"/>
--------------------------------------

Figure 12: Other information

## 7 Date and signature

Following the contents of the actual notification of major holdings of voting rights and financial instruments outlined in the previous chapter, the date and signature are provided. The signature is a simple text field:

```
<eus:signing>  
  <eus:date>2018-05-24</eus:date>  
  
  <!-- Text, maximum of 80 characters -->  
  <eus:signature>Erika Musterfrau</eus:signature>  
</eus:signing>
```

In the form view:


Date,	Signature 
<input type="text" value="24.05.2018"/>	<input type="text" value="Erika Musterfrau"/>

Figure 13: Date and signature

## 8 Annex

The annex consists of three different blocks. Only the first block is obligatory in the case of a notification:

```
<eus:annex>  
  <eus:annexIdentityPersonSubject></eus:annexIdentityPersonSubject>  
  <eus:annexIdentityNotifier></eus:annexIdentityNotifier>  
  <eus:annexOtherInformation></eus:annexOtherInformation>  
</eus:annex>
```

These three blocks are described individually in the following.

### 8.1 Identity of the person subject to the notification obligation (`annexIdentityPersonSubject`)

This section has the following structure. In the following example, the registered office rather than the business address of the person subject to the notification obligation is entered as the address:

```
<eus:annexIdentityPersonSubject>  
  <eus:address>  
    <eus:street>  
      <!-- Text, maximum of 120 characters -->  
    </eus:street>  
    <eus:streetNumber>  
      <!-- Text, maximum of 15 characters -->  
    </eus:streetNumber>  
    <eus:postalCode>  
      <!-- Optional text, maximum of 15 characters -->  
    </eus:postalCode>  
    <eus:city>  
      <!-- Text, maximum of 80 characters -->  
    </eus:city>  
    <eus:country>  
      <!-- Two-digit country code -->  
    </eus:country>  
  </eus:address>  
  <eus:registeredOffice>true</eus:registeredOffice>  
  <eus:businessAddress>>false</eus:businessAddress>  
  <eus:contactPerson>  
    <!-- Text, maximum of 200 characters -->  
  </eus:contactPerson>  
  <eus:contact>  
    <!-- At least one of the following elements -->  
    <eus:phone>  
      <!-- Text, maximum of 40 characters -->  
    </eus:phone>  
    <eus:fax>  
      <!-- Text, maximum of 40 characters -->  
    </eus:fax>  
    <eus:email>  
      <!-- Text, maximum of 80 characters -->  
    </eus:email>  
  </eus:contact>  
</eus:annexIdentityPersonSubject>
```

In the form view:

**1. Identity of the person subject to the notification obligation**


Street	<input type="text"/>
Street number	<input type="text"/>
Postal code	<input type="text"/>
City	<input type="text"/>
Country	<input type="text"/>
In case of legal entities:	<input checked="" type="checkbox"/> registered office <input type="checkbox"/> business address
Contact person	<input type="text"/>
Phone number 	<input type="text"/>
Fax number	<input type="text"/>
E-mail	<input type="text"/>

Figure 14: Annex/Identity of the person subject to the notification obligation


## 8.2 Identity of the notifier (`annexIdentityNotifier`)

The details to be provided for the notifier have the following structure:

```
<eus:annexIdentityNotifier>
  <eus:name>
    <!-- Text, maximum of 200 characters -->
  </eus:name>
  <eus:company>
    <!-- Optional text, maximum of 200 characters -->
  </eus:company>
  <eus:address>
    <!-- as described in part 8.1 -->
  </eus:address>
  <eus:contact>
    <!-- as described in part 8.1 -->
  </eus:contact>
</eus:annexIdentityNotifier>
```

In the form view:

**2. Identity of notifier** (if different from 1.)

Name	<input type="text"/>
Company	<input type="text"/>
Street	<input type="text"/>
Street number	<input type="text"/>
Postal code	<input type="text"/>
City	<input type="text"/>
Country	<input type="text"/>
Phone number 	<input type="text"/>
Fax number	<input type="text"/>
E-mail	<input type="text"/>

**Figure 15: Annex/Identity of the notifier**

### **8.3 Other information (`annexOtherInformation`)**

```
<eus:annexOtherInformation>  
  <!-- Text, maximum of 1600 characters -->  
</eus:annexOtherInformation>
```

**3. Other useful information**

**Figure 16: Annex/Other information (text field cut off)**

## **9 Addendum**

### **9.1 Structure of the XML file intended for publication**

In principle, the XML file intended for publication (hereafter abbreviated to “P file”) has the same structure as the XML file described here which is to be transmitted for a report. However, there are some specific differences which are documented in the following:

#### **9.1.1 Other namespace**

In the P file, instead of `http://www.bafin.de/mvp/eus/` the following namespace will be used:

`http://www.bafin.de/mvp/eus/public/`

#### **9.1.2 Elements without a name prefix**

While the elements of an XML-based report each have one namespace prefix due to the required namespace declaration, the elements of a P file do not have this prefix.

For example, the element `<eus:name></eus:name>` in an XML report would be simply specified as follows in the P file: `<name></name>`.

#### **9.1.3 Other root element**

While the root element of an XML-based report is designated `inEus`, the root element of a P file is named `notificationOfMajorHoldings`.

#### **9.1.4 No annex**

None of the elements of the annex is included in a P file.

#### **9.1.5 No organisational chart**

None of the details regarding an uploaded organisational chart – i.e. in particular the element `<organizationalChartFilename>` and (at the highest level) the element `<datei>` – is included in a P file.

### **9.1.6 Abridged version of a P file (German report)**

```
<?xml version="1.0" encoding="UTF-8"?>
<notificationOfMajorHoldings xmlns="http://www.bafin.de/mvp/eus/public/"
  xmlns:xsi="http://www.w3.org/2001/XMLSchema-instance">
  <language>de</language>
  <heading>
    ...
  </heading>
  <notification>
    ...
  </notification>
  <signing>
    ...
  </signing>
</notificationOfMajorHoldings>
```