

Why a User Guide?

- From July 1st, 2020 the BaFin has decided that substantial shareholding disclosures will now be handled via their Reporting and Publication Platform (Melde und Veröffentlichungsplattform – MVP) electronic portal.
- **From that date Word documents sent by fax or mail will no longer be accepted.**
- Disclosures can either be done manually through the portal or uploaded using XML documents.
- Rappr will now generate an XML file for the Major Germany rules.
- Instructions on how to register for the portal were announced in your environment via a notification. The next section contains a more succinct version.
- This User Guide is to assist you in the transition to the new reporting methodology.

How to Register for the MVP Portal

In order to use the MVP portal you must be registered, **which has to be done in advance of the deadline.** There is no transition or grace period, and BaFin has advised that being in the midst of the registration application process will not be an acceptable reason to delay notifications. **For those who have not yet done so, we encourage you to please begin the registration process at your earliest possible convenience in order to avoid problems.**

Detailed instructions for registration to the portal begin on page 2 of the manual linked below. Partway through this process, an email confirmation will be required. With the successful registration, your Username and Password will be displayed on the screen. Copy these to a safe place immediately. Once registered on the portal there is a separate registration process required to be able to submit disclosures. This registration must also be completed before the July 1st deadline. Please log in to the portal and follow the instructions, which begin on page 5 of the manual. This will involve printing and signing a pdf and faxing it to BaFin before authorization to use the portal to disclose will be permitted.

To register, please follow this link: https://portal.mvp.bafin.de/MvpPortalWeb/app/login.html?locale=en_UK

Carefully follow the detailed registration instructions found in this manual:

https://www.bafin.de/SharedDocs/Downloads/EN/MVP/dl_TEST_Stimmrechtsmitteilung_Zulassung_Registrierung_MVP_en.pdf?__blob=publicationFile&v=3

If you have any questions, please contact us at support@fundapps.co

Process Overview

- From the results screen in Rappr, go to the result details page of the disclosure you wish to file and click "Generate Document", as usual.
- Five documents will be available, the two Word documents you are used to seeing, and the three new XML documents.
- The Word documents will generate as usual, but from July 1st are for reference only.
- The XML document you choose to upload depends on the chain of control structure of your organization. How to select the correct document will be covered in the next section.
- You can use the Word documents to compare with the results generated for the XML document you have selected. The data being reported is the same, just in a different format.

- Specifics of how to compare the two types of documents and make any necessary changes will be covered extensively in this User Guide.
- Once satisfied with your completed XML document, go to the MVP portal, log in, and upload it. Instructions on how to upload are included in this User Guide below.
- When your upload has been successful, a copy of your XML document (with extraneous spaces, comments, and organisation chart data removed) - along with a pdf generated version of the XML results - will be available for you to download.
- These BaFin generated documents are intended for you to send to the issuer. Doing so will complete your disclosure obligation.

Why 3 XML Documents?

- With the Word documents, the two check boxes in the Chain of Control section (box 8, page 3) were left empty, and previously you were to mark one of them with an 'X'.
- In the new format the options "*notifier is not controlled or controlling*" or "*full chain of controlled undertakings starting with top legal entity*" are separated into their own XML forms. You are required to choose one of these XML files. Please review all options before selecting. If you would normally mark:
 - The top box ("*notifier is not controlled or controlling*") then the XML document you should use is the one that includes the words "**NO_CoC**" in the name. This is for "**No Chain of Control**".
 - The lower box ("*full chain of controlled undertakings starting with top legal entity*") then the XML document you should use is the one that includes the words "**ENTITIES_CoC**" in the name. This is for "**Full Chain of Control for Entities**".
- A new option, that includes coverage for a third possibility. The case of a sole portfolio or fund that exists within a partnership, trust, or other "legal wrapper" (e.g. UCITS fund) - the "**Portfolio Chain of Control**". This will not be common, but for those clients who have a portfolio that is controlled by a general partner or fund company and believe this best suits them, the third XML document with "**PORTFOLIO_CoC**" in the name has been created.
- Manual edits to the XML files **may be required**, similar to the ones you would have made in the Word documents (sections on: names of shareholders, proxy voting, and other useful information). **Please save your XML edits regularly - and when you are finished - to ensure all your changes make it into the final, upload-ready document.**
 - To edit your XML document, we recommend **Notepad++**. It is free, visually clean, and simple to use. You can download a copy here: https://download.cnet.com/Notepad/3000-2352_4-10327521.html
- The "**ENTITIES_CoC**" document **MAY specifically require some manual edits** to include the required organisation chart. These additional steps will be detailed below.

Where to Find Your Data in the XML Documents (compared to Word) - and How to Edit

Comment strings have been added to the XML documents to help you navigate through it - these can be seen in green and will not be uploaded to the MVP portal. Text in Blue and Black will be uploaded. All the sections in the main Word document are handily outlined by a box and numbered. The corresponding section of the XML document will have a comment above it with the associated box number. None of the examples shown pertain to real holdings. They are for information purposes only. Let's begin!

```

<!-- BOX 1 - Details of Issuer -->
<eus:detailsOfIssuer>
  <eus:name>Lufthansa Global Business Services GmbH</eus:name>
  <eus:lei>5299001M8IZ7PBJR1Y18</eus:lei>

```

- **Box 0 - Notification of Major Holdings**

| |
|---|
| <input checked="" type="checkbox"/> Notification of Major Holdings or <input type="checkbox"/> Correction of a notification of Major Holdings dated |
|---|

```

<!-- BOX 0 - Notification of Major Holdings -->
<eus:heading>
  <eus:notificationReport></eus:notificationReport>
</eus:heading>

```

As with the Word document, this box is hard-coded as a "Notification of Major Holdings". This is how BaFin requires us to mark a box as "checked" in XML format.

If corrections are required (lower box) they can be made manually through the portal.

- **Box 1 - Details of Issuer**

| | | |
|---|--------------------------------|---------------------------|
| 1. Details of issuer | | |
| Name: | Legal Entity Identifier (LEI): | |
| Lufthansa Global Business Services GmbH | 5299001M8IZ7PBJR1Y18 | |
| Street, Street number: | Postal code: | City: |
| Lufthansa-Basis, Tor 21 | | Issuer City not specified |

```

<!-- BOX 1 - Details of Issuer -->
<eus:detailsOfIssuer>
  <eus:name>Lufthansa Global Business Services GmbH</eus:name>
  <eus:lei>5299001M8IZ7PBJR1Y18</eus:lei>
  <eus:streetAndNumber>Lufthansa-Basis, Tor 21</eus:streetAndNumber>
  <eus:postalCode> </eus:postalCode>
  <eus:city>Issuer City not specified</eus:city>
</eus:detailsOfIssuer>

```

In this example, Postal Code and City were not made available to the form. In order to add them manually, first go to the zip folder created by Rappr when **Generate Document** was clicked and **EXTRACT ALL** the files. They can only be edited once they have been extracted from the zip folder.

Then simply add the required data between the two sets of blue XML tags (and save):

```

<!-- BOX 1 - Details of Issuer -->
<eus:detailsOfIssuer>
  <eus:name>Lufthansa Global Business Services GmbH</eus:name>
  <eus:lei>5299001M8IZ7PBJR1Y18</eus:lei>
  <eus:streetAndNumber>Lufthansa-Basis, Tor 21</eus:streetAndNumber>
  <eus:postalCode>60546</eus:postalCode>
  <eus:city>Frankfurt am Main</eus:city>
</eus:detailsOfIssuer>

```

- **Box 2 - Reason for Notification**

Only the top three options are automated here, as with the Word document. Rappr does not currently have the functionality to add an “Other reason”, and BaFin have been quite prescriptive here. There is a very specific set of “Other reasons” that can be included and they consist of XML tag pairs that must be added verbatim.

In this example, we will see that the reasons for notification are a change in shares and a change in financial instruments. In Word, the boxes are marked with an ‘X’. In the XML the appropriate tags are generated to show the same:

| |
|---|
| <p>2. Reason for notification (multiple reasons possible)</p> <p><input checked="" type="checkbox"/> Acquisition/disposal of shares with voting rights</p> <p><input checked="" type="checkbox"/> Acquisition/disposal of instruments</p> <p><input type="checkbox"/> Change of breakdown of voting rights</p> <p><input type="checkbox"/> Other reason:</p> |
|---|

```

<!-- BOX 2 - Reason for Notification -->
<eus:reasonForNotification>
  <eus:acquisitionDisposalVotingRights></eus:acquisitionDisposalVotingRights>
  <eus:acquisitionDisposalInstruments></eus:acquisitionDisposalInstruments>
</eus:reasonForNotification>

```

Note that there is an empty line in the XML underneath the tags for the checkbox called “*Acquisition/disposal of instruments*” in Word. This is because the third option “*Change of breakdown of voting rights*” was not used. This is absolutely fine. The BaFin MVP ignores tabs and spaces, so this will not adversely affect your upload.

If an “Other Reason” is to be added, it must be ONLY ONE of the following verbatim:

- First time admission of shares
- Stock notification of voting rights
- Voluntary group notification
- Exercise of instruments
- Acting in concert
- Other

The format for these will be to embed one of the following tag pairs:

```
<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>
```

Inside the parent tags for “Other Reason”. So assuming the choice was “**Acting in concert**”, the following would be added into our example to produce:

```
<!-- BOX 2 - Reason for Notification -->
<eus:reasonForNotification>
  <eus:acquisitionDisposalVotingRights></eus:acquisitionDisposalVotingRights>
  <eus:acquisitionDisposalInstruments></eus:acquisitionDisposalInstruments>
  <eus:otherReason>
    <eus:actingInConcert></eus:actingInConcert>
  </eus:otherReason>
</eus:reasonForNotification>
```

Please note that the “**Acting in concert**” tags are embedded between the “Other Reason” parent tags.

Also important to note the **<eus:** at the beginning of the start tag and **</eus:** at the beginning of the end tag. These are required. Be aware of the added “/” in the end tag (in case any of you unfamiliar with XML tag structure).

If the “Other Reason” is the last item on the list above (aka “**Other**”):

```
<eus:other><!-- Text, maximum of 300 characters --></eus:other>
```

Please replace the green text with whatever your reason is. You can use up to 300 characters.

```

<!-- BOX 2 - Reason for Notification -->
<eus:reasonForNotification>
  <eus:acquisitionDisposalVotingRights></eus:acquisitionDisposalVotingRights>
  <eus:acquisitionDisposalInstruments></eus:acquisitionDisposalInstruments>
  <eus:otherReason>
    <eus:other>Hello BaFin!</eus:other>
  </eus:otherReason>
</eus:reasonForNotification>

```

This would *probably* be an unacceptable reason!

- **Box 3 - Details of person subject to the notification obligation**

| 3. Details of person subject to the notification obligation | |
|---|---|
| Natural person (first name, surname): | Legal entity: FundApps Ltd |
| Date of birth: | City of registered office, country: Please fill in the city where the reporting person is located, GB |

```

<!-- BLOCK 3 - Details of Person Subject to the Notification Obligation -->
<eus:detailsOfPersonSubject>
  <eus:legalEntityList>
    <eus:legalEntity>
      <eus:name>FundApps Ltd</eus:name>
      <eus:cityOfRegisteredOffice>Please fill in the city where the reporting person is located</eus:cityOfRegisteredOffice>
      <eus:country>GB</eus:country>
    </eus:legalEntity>
  </eus:legalEntityList>
</eus:detailsOfPersonSubject>

```

Another example of missing data. This can be corrected in the future by adding a value to the ReportingPersonCity property in the Form Properties section in Rappr. For the time being, however, it can be manually changed in the XML as per the example in Box 1 above.

We assume all our clients will only require the “Legal entity” side of this completed. Please contact [support](#) if that is not the case.

- **Box 4 - Name(s) of shareholder(s)**

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

Again, Rappr has no way to fill this out. In the unlikely event it is required, please replace this:

```
<!-- BOX 4 - Name(s) of Shareholder(s) - ***This block is optional*** -->
<!--
<eus:namesOfShareholders></eus:namesOfShareholders>
-->
```

With this below (use as many “<eus:name></eus:name>” tags as necessary):

```
<!-- BOX 4 - Name(s) of Shareholder(s) - ***This block is optional*** -->
<eus:namesOfShareholders>
  <eus:name>Name of the first shareholder</eus:name>
  <eus:name>Name of the second shareholder</eus:name>
</eus:namesOfShareholders>
```

Note: the removal of the “comment tags” “<!--” And “-->” (the empty highlights above) will turn the tags blue, which means they are visible and able to be uploaded by the MVP portal.

- **Box 5 - Date on which the threshold was crossed or reached**

5. Date on which threshold was crossed or reached: 02.02.2050

BaFin have decided on a different date format for the XML (yyyy-mm-dd)!

```
<!-- BOX 5 - Date on which the Threshold was Crossed or Reached -->
<eus:dateThreshold>2050-02-02</eus:dateThreshold>
```

- **Box 6 - Total Positions**

| 6. Total positions | | | | |
|---------------------------------------|---|---|----------------------------------|--|
| | % 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 | 26.70% | 13.30% | 40.00% | 1,000.00 |
| Previous notification (if applicable) | 20.70% | 12.00% | 32.70% | |

```

<!-- Box 6 - Total Positions (Table) -->
<eus:totalPositions>
  <eus:new>
    <eus:percentageVotingRightsShares>26.70</eus:percentageVotingRightsShares>
    <eus:percentageVotingRightsInstruments>13.30</eus:percentageVotingRightsInstruments>
    <eus:percentageTotalOfBoth>40.00</eus:percentageTotalOfBoth>
    <eus:totalNumberOfVotingRights>1000</eus:totalNumberOfVotingRights>
  </eus:new>
  <eus:previousNotification>
    <eus:percentageVotingRightsShares>20.70</eus:percentageVotingRightsShares>
    <eus:percentageVotingRightsInstruments>12.00</eus:percentageVotingRightsInstruments>
    <eus:percentageTotalOfBoth>32.70</eus:percentageTotalOfBoth>
  </eus:previousNotification>
</eus:totalPositions>

```

Note: that the total is not allowed to have decimal places in the XML, and percentage symbols (%) are no longer required.

- **Box 7 a - Voting rights attached to shares (Sec. 33, 34 WpHG)**

| 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) |
| DE0008232125 | 60 | 150 | 6.00% | 15.00% |
| DE0008232126 | | 40 | | 4.00% |
| US2515613048 | | Less than 3% | | Less than 3% |
| Total | | 267 | | 26.70% |

```

<!-- BOX 7 a - Voting Rights Attached to Shares (Sec. 33, 34 WpHG) - (Table) -->
<eus:votingRights>
  <eus:votingRightsList>

    <eus:votingRightsElement>
      <eus:isin>DE0008232125</eus:isin>
      <eus:absoluteDirect>60</eus:absoluteDirect>
      <eus:absoluteIndirect>150</eus:absoluteIndirect>
      <eus:percentageDirect>6.00</eus:percentageDirect>
      <eus:percentageIndirect>15.00</eus:percentageIndirect>
    </eus:votingRightsElement>

    <eus:votingRightsElement>
      <eus:isin>DE0008232126</eus:isin>
      <eus:absoluteDirect>0</eus:absoluteDirect>
      <eus:absoluteIndirect>40</eus:absoluteIndirect>
      <eus:percentageDirect>0.00</eus:percentageDirect>
      <eus:percentageIndirect>4.00</eus:percentageIndirect>
    </eus:votingRightsElement>

    <eus:votingRightsElement>
      <eus:isin>US2515613048</eus:isin>
      <eus:absoluteDirect>0</eus:absoluteDirect>
      <eus:absoluteIndirect>17</eus:absoluteIndirect>
      <eus:percentageDirect>0.00</eus:percentageDirect>
      <eus:percentageIndirect>1.70</eus:percentageIndirect>
    </eus:votingRightsElement>

  </eus:votingRightsList>
  <eus:total>
    <eus:absolute>267</eus:absolute>
    <eus:percentage>26.70</eus:percentage>
  </eus:total>
</eus:votingRights>

```

“Less than 3%” and “Less than 5%” are not permitted by the XSD schema - numbers only. So the XML no longer masks small numbers. In this example, 1.70% is now shown instead of “Less than 3%” in the Word documents. In addition, blank boxes are replaced by “0” or “0.00”.

- **Box 7 b 1 - Instruments according to Sec. 38(1) no. 1 WpHG - (Table)**

| b.1. Instruments according to Sec. 38 (1) no. 1 WpHG (please use annex in case of more than 3 instruments) (Note that holdings lent out would be displayed here as asset class “Equity” or “PreferredEquity” so please update this to the correct name accordingly) | | | | |
|---|-----------------------------|---|------------------------|--------------------|
| Type of instrument | Expiration or maturity date | Exercise or conversion period | Voting rights absolute | Voting rights in % |
| Equity: Lent Securities | Please fill in | Please fill in days until exercise/conversion | 70 | 7.00% |
| Option | 2051-01-11 00:00:00 | 343 days until exercise/conversion | 33 | 3.30% |
| Total | | | 103 | 10.30% |

```

<!-- BOX 7 b1 - Instruments According to Sec. 38(1) no.1 WpHG - (Table) -->
<eus:instruments1>
  <eus:instrument1List>

    <eus:instrument1Element>
      <eus:typeOfInstrument>Equity: Lent Securities</eus:typeOfInstrument>
      <eus:expirationOrMaturityDate>n/a</eus:expirationOrMaturityDate>
      <eus:exerciseOrConversionPeriod>n/a</eus:exerciseOrConversionPeriod>
      <eus:votingRightsAbsolute>70</eus:votingRightsAbsolute>
      <eus:votingRightsPercentage>7.00</eus:votingRightsPercentage>
    </eus:instrument1Element>

    <eus:instrument1Element>
      <eus:typeOfInstrument>Option</eus:typeOfInstrument>
      <eus:expirationOrMaturityDate>2051-01-11</eus:expirationOrMaturityDate>
      <eus:exerciseOrConversionPeriod>343 days</eus:exerciseOrConversionPeriod>
      <eus:votingRightsAbsolute>33</eus:votingRightsAbsolute>
      <eus:votingRightsPercentage>3.30</eus:votingRightsPercentage>
    </eus:instrument1Element>

  </eus:instrument1List>
  <eus:total>
    <eus:absolute>103</eus:absolute>
    <eus:percentage>10.30</eus:percentage>
  </eus:total>
</eus:instruments1>

```

Logic has been added to print “n/a” for MaturityDate and DaysToMaturity for Lent Equities in box 7b1, but if you see “Please fill in” anywhere in this table, please change that to the correct date or number. Again, please note BaFin has changed the date format for the XML to **yyyy-mm-dd**.

Additionally, you will note the change in the “Exercise or conversion period” description from “**343 days until exercise/conversion**” to what is printed in the XML “**343 days**”. This is because the XSD schema only allows a small number of characters for this tag pair. So if you do need to change the XML from “Please fill in etc...” to the correct answer, please limit the entry to the format “**X days**”.

- **Box 7 b 2 - Instruments according to Sec. 38(1) no. 2 WpHG - (Table)**

| b.2. Instruments according to Sec. 38 (1) no. 2 WpHG (please use annex in case of more than 3 instruments) (Note that holdings held via indices, baskets and ETFs would be displayed here as asset class “Equity” or “PreferredEquity” so please update this to the correct name accordingly) | | | | | |
|---|-----------------------------|---------------------------------------|-----------------------------|------------------------|--------------------|
| Type of instrument | Expiration or maturity date | Exercise or conversion period | Cash or physical settlement | Voting rights absolute | Voting rights in % |
| Future | 2051-01-01 00:00:00 | 333 days until exercise/conversion | Cash Settlement | 30 | 3.00% |
| Total | | | | 30 | 3.00% |

```

<!-- BOX 7 b2 - Instruments According to Sec. 38(1) no.2 WpHG - (Table) -->
<eus:instruments2>
  <eus:instrument2List>

    <eus:instrument2Element>
      <eus:typeOfInstrument>Future</eus:typeOfInstrument>
      <eus:expirationOrMaturityDate>2051-01-01</eus:expirationOrMaturityDate>
      <eus:exerciseOrConversionPeriod>333 days</eus:exerciseOrConversionPeriod>
      <eus:cashOrPhysicalSettlement>Cash Settlement</eus:cashOrPhysicalSettlement>
      <eus:votingRightsAbsolute>30</eus:votingRightsAbsolute>
      <eus:votingRightsPercentage>3.00</eus:votingRightsPercentage>
    </eus:instrument2Element>

  </eus:instrument2List>
  <eus:total>
    <eus:absolute>30</eus:absolute>
    <eus:percentage>3.00</eus:percentage>
  </eus:total>
</eus:instruments2>

```

Same instructions as per 7b1 above.

- **Box 8 - Information in relation to the person subject to the notification obligation - (Table)**

Okay, this section is the most complex part. As mentioned at the start of the User Guide there are three possibilities here. Each will be outlined separately. The first one is easy:

NO Chain of Control

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

Person subject to the notification (3.) obligation 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 four undertakings please always provide only to BaFin also an organizational chart):

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

```

<!-- BOX 8 a - Information in relation to the person subject to the notification obligation - NO CHAIN OF CONTROL -->
<eus:informationPersonSubject>
  <eus:notControlledNorControlling></eus:notControlledNorControlling>
</eus:informationPersonSubject>

```

And that's it! The person subject to the notification is the Legal Entity in box 3 above. Nothing else to do here.

ENTITIES Chain of Control

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

Person subject to the notification (3.) obligation 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 four undertakings please always provide only to BaFin also an organizational chart):

| Name | % of voting rights (if at least 3% or more) | % of voting rights through instruments (if at least 5% or more) | Total of both (if at least 5% or more) |
|-------------------------------|--|---|---|
| FundApps Ltd | 26.70 | 13.30 | 40.00 |
| FundApps Capital Partners Ltd | 11.70 | 0.00 | 11.70 |
| FundApps International Inc | 15.00 | 13.30 | 28.30 |
| | | | |

And here you can see what Rappr will generate for the ENTITIES_CoC XML document:

```
<!-- BOX 8 b - Information in relation to the person subject to the notification obligation - ENTITIES FULL -->
<eus:informationPersonSubject>
  <eus:fullChainOfControlledUndertakings>

    <eus:controlledUndertaking>
      <eus:name>FundApps Ltd</eus:name>
      <eus:percentageVotingRights>26.70</eus:percentageVotingRights>
      <eus:percentageInstruments>13.30</eus:percentageInstruments>
      <eus:totalOfBoth>40.00</eus:totalOfBoth>
    </eus:controlledUndertaking>

    <eus:controlledUndertaking>
      <eus:name>FundApps Capital Partners Ltd</eus:name>
      <eus:percentageVotingRights>11.70</eus:percentageVotingRights>
      <eus:totalOfBoth>11.70</eus:totalOfBoth>
    </eus:controlledUndertaking>

    <eus:controlledUndertaking>
      <eus:name>FundApps International Inc</eus:name>
      <eus:percentageVotingRights>15.00</eus:percentageVotingRights>
      <eus:percentageInstruments>13.30</eus:percentageInstruments>
      <eus:totalOfBoth>28.30</eus:totalOfBoth>
    </eus:controlledUndertaking>

  </eus:fullChainOfControlledUndertakings>
  <eus:organizationalChartFilename>BaFin_OrgChart.pdf</eus:organizationalChartFilename>
</eus:informationPersonSubject>
```

Notes: The parent tags “Full chain of controlled undertakings” correspond to the lower checkbox on the Word document. Additionally, where the voting rights are less than 3% or the Instruments or Aggregated percentage is less than 5%, the number is not to be included (note the highlighted text in the column headings). The XSD will not allow numbers below those thresholds (or their associated tags) to be uploaded into the MVP portal, so code logic has been added to remove them. This is why you see the highlighted empty line in the middle of the XML screen cap. As the financial instruments percentage is less than 5% for the middle entity, the entire line has not been generated.

The part of this that involves editing relates to the last highlighted line above. The one with the small red line added to the screen cap. The **inclusion of the organisation chart** - part of a disclosure many of you will be familiar with - is the complex part referred to at the start of this section. This tag has been artificially added

here as including an organisation chart is only required where the number of undertakings is 5 or more. **We will continue this discussion at the end of the commentary on how to edit the documents under ‘How to add an Organisation Chart’.**

PORTFOLIO Chain of Control

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

Person subject to the notification (3.) obligation 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 four undertakings please always provide only to BaFin also an organizational chart):

| Name | % of voting rights (if at least 3% or more) | % of voting rights through instruments (if at least 5% or more) | Total of both (if at least 5% or more) |
|-------------------|--|---|---|
| Global Macro Fund | 26.70 | 13.30 | 40.00 |
| | | | |

```
<!-- BOX 8 c - Information in relation to the person subject to the notification obligation - PORTFOLIO 'with LEGAL WRAPPER'
<eus:informationPersonSubject>
  <eus:fullChainOfControlledUndertakings>
    <eus:controlledUndertaking>
      <eus:name>Global Macro Fund</eus:name>
      <eus:percentageVotingRights>26.70</eus:percentageVotingRights>
      <eus:percentageInstruments>13.30</eus:percentageInstruments>
      <eus:totalOfBoth>40.00</eus:totalOfBoth>
    </eus:controlledUndertaking>
  </eus:fullChainOfControlledUndertakings>
</eus:informationPersonSubject>
```

In the “**Portfolio Chain of Control**”, there is only one entry in the chain of control. Normally we would advise that this entry be deleted from the table, but in this case leave it in the XML, but go up to Box 3 at the top of the XML document and change the Legal Entity name to the appropriate “legal wrapper” your single portfolio/fund is held in or entity the fund is controlled by (e.g. general partner):

```
<!-- BOX 3 - Details of Person Subject to the Notification Obligation -->
<eus:detailsOfPersonSubject>
  <eus:legalEntityList>
    <eus:legalEntity>
      <eus:name>John Smith, General Partner</eus:name>
      <eus:cityOfRegisteredOffice>London</eus:cityOfRegisteredOffice>
      <eus:country>GB</eus:country>
    </eus:legalEntity>
  </eus:legalEntityList>
</eus:detailsOfPersonSubject>
```

As there are less than 5 undertakings in the chain of control, there is no requirement to include an organisational chart - as highlighted in the Word document above - so the org chart tags have been removed.

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

| 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: | | |
| Total positions (6.) after general meeting: | | |
| % of voting rights attached to shares | % of voting rights through instruments | Total of both |
| % | % | % |

If this section is required, please change this:

```
<!-- BOX 9 - In case of proxy voting according to Sec. 34 (3) WpHG - ***This block is optional*** -->
<!--
<eus:proxyVoting></eus:proxyVoting>
-->
```

To this:

```
<!-- BOX 9 - In case of proxy voting according to Sec. 34 (3) WpHG - ***This block is optional*** -->
<eus:proxyVoting>
  <eus:dateOfGeneralMeeting>2018-05-24</eus:dateOfGeneralMeeting>
  <eus:percentageVotingRightsShares>5.35</eus:percentageVotingRightsShares>
  <eus:percentageVotingRightsInstruments>7.05</eus:percentageVotingRightsInstruments>
  <eus:totalOfBoth>12.40</eus:totalOfBoth>
</eus:proxyVoting>
```

Again, date format is “yyyy-mm-dd”. As with the changes to Box 4 above, please note the removal of the “comment tags” “<!--” And “-->” to enable this section to be uploaded by the MVP portal.

- **Box 10 - Other useful information**

This can be anything you feel BaFin should know.

| 10. Other useful information |
|---|
| <div style="background-color: #cccccc; width: 50px; height: 15px; margin-bottom: 5px;"></div> |

Change this:

```
<!-- BOX 10 - Other useful information - ***This block is optional*** -->
<!--
<eus:otherInformation></eus:otherInformation>
-->
```

to this:

```
<!-- BOX 10 - Other useful information - ***This block is optional*** -->  
<eus:otherInformation><!-- Text with maximum of 400 characters --></eus:otherInformation>
```

Remove the “comment tags” “<!--” And “-->” and change the highlighted text between the tags to whatever information you wish to include.

- **Area Below Box 10**

This area is for signature and date. Please ensure the ReportingPersonFirst and ReportingPersonLast are completed in the Form Properties section in Rappr to make sure this populates correctly. Or manually add the full name between the XML tags.

24.06.2020,
Date,

.....
Signature

```
<!-- AREA BELOW BLOCK 10 -->  
<eus:signing>  
  <eus:date>2020-06-24</eus:date>  
  <eus:signature> </eus:signature>  
</eus:signing>
```

- **Annex 1 - Identity of the person subject to the notification obligation**

Annex (only for BaFin)

| | |
|--|---|
| 1. Identity of the person subject to the notification obligation: | |
| Street: | 20 Main Street |
| Street number: | |
| Postal code: | 10007 |
| City: | New York |
| Country: | US |
| | In case of legal entities: <input type="checkbox"/> registered office <input type="checkbox"/> business address |
| Contact person: | |
| Phone number: | Please fill in the phone number of the reporting person |
| Fax number: | Please fill in the fax number of the reporting person |
| E-mail: | Please fill in the email address of the reporting person |

Please amend any sections that have not filled out properly.

Also, note the hyphen (-) between the "Street number" tags in the XML below. As Rappr does not separate the street address into street and number components, this is the safest way we found to get this tag pair to successfully upload. Please leave it as is.

```
<!-- ANNEX SECTION - This is for BaFin only -->
<eus:annex>
<!-- ANNEX 1 - Identity of the person subject to the notification obligation: -->
  <eus:annexIdentityPersonSubject>
    <eus:address>
      <eus:street>20 Main Street</eus:street>
      <eus:streetNumber>-</eus:streetNumber>
      <eus:postalCode>10007</eus:postalCode>
      <eus:city>New York</eus:city>
      <eus:country>US</eus:country>
    </eus:address>
    <eus:registeredOffice>true</eus:registeredOffice>
    <eus:businessAddress>>false</eus:businessAddress>
    <eus:contactPerson> </eus:contactPerson>
    <eus:contact>
      <eus:phone>Please fill in the phone number of the reporting person</eus:phone>
      <eus:fax>Please fill in the fax number of the reporting person</eus:fax>
      <eus:email>Please fill in the email address of the reporting person</eus:email>
    </eus:contact>
  </eus:annexIdentityPersonSubject>
```

- **Annex 2 - Identity of notifier (if different from 1)**

| 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"/> @ <input type="text"/> |

```
<!-- ANNEX 2 - Identity of notifier (if different from Annex 1) - ***This BOX is optional*** -->
<!--
<eus:annexIdentityNotifier></eus:annexIdentityNotifier>
-->
```

It is probably unlikely you will need this optional box, if you do, here is a sample of how you would complete it. Just replace these fictitious details with real ones!

```
<!-- ANNEX 2 - Identity of notifier (if different from Annex 1) - ***This BOX is optional*** -->
<eus:annexIdentityNotifier>
  <eus:name>Fred Jones</eus:name>
  <eus:company>Fred's Bank</eus:company>
  <eus:address>
    <eus:street>120 Finance Street</eus:street>
    <eus:streetNumber>-</eus:streetNumber>
    <eus:postalCode>123456</eus:postalCode>
    <eus:city>Bedrock</eus:city>
    <eus:country>Australia</eus:country>
  </eus:address>
  <eus:contact>
    <eus:phone>+611122334455</eus:phone>
    <eus:fax>+6155444332211</eus:fax>
    <eus:email>fred@fredsbank.au</eus:email>
  </eus:contact>
</eus:annexIdentityNotifier>
```

- **Annex 3 - Other useful information**

| |
|--|
| 3. Other useful information:  |
|--|

```
<!-- ANNEX 3 - Other useful information - ***This BOX is optional*** -->
<!--
<eus:annexOtherInformation></eus:annexOtherInformation>
-->
```

Again, it is unlikely you will need this optional box, but if you do, remove the highlighted “comment tags” “<!--” and “-->” and add up to 1600 characters of text in the highlighted spot between the two tags “><” above.

If you are using the “**No Chain of Control**” or “**Portfolio Chain of Control**” document, you are now finished editing, and it’s time to upload.

If you are using the “**Full Chain of Control for Entities**” document and you have **5 or more entity undertakings in your chain of control (entities only, not portfolios)**, this next section describes the steps involved in adding an organisational chart.

How to add an Organisation Chart

If you are using the “**Full Chain of Control for Entities**” document, and if **you have more than 5 entity undertakings (entities only, not portfolios)**, then you will need to include an organisation chart with your disclosure.

There are two parts to this. The first is to add **the filename** of the PDF document (it must be a pdf) which contains your organisation chart between the tags at the end of the Chain of Control section. The second is to add a 64 bit binary string conversion of this pdf document to the very end of the “ENTITIES_CoC” XML disclosure document.

- **Step 1 - Add the pdf filename to the XML**

At the end of the Chain of Control section you will see this tag pair, pre-populated with a generic organisation chart name:

```
</eus:fullChainOfControlledUndertakings>  
<eus:organizationalChartFilename>BaFin_OrgChart.pdf</eus:organizationalChartFilename>  
</eus:informationPersonSubject>
```

If you choose to use “*BaFin_OrgChart.pdf*” as your filename, then you are finished with step 1. If not, add the filename verbatim you have chosen in place of this name.

- **Step 2 - Converting your PDF to 64 bit and adding to the XML document**

If you have an organisation chart in Word format, you can use *File > Export > Create PDF/XPS* to create a PDF version.

Once you have the document in PDF format, you need to convert it to a 64 bit binary string that can be read by BaFin’s XML parser. There are many free, public options available, and it is worth noting this information will be public record when received by BaFin. There will also be pay options should you choose to go that route.

As an example, we’ll use this free website, but the mechanics should be extremely similar to whichever app or website you choose: <https://www.base64encode.org/>

The top section is for if you just have a string of text you want to convert. We want to convert an entire document, so scroll down until you see this section for **encoding files** (it defaults to the highlighted “Binary” that we want):

Encode files into Base64 format

Select a file to upload and process, then you can download the encoded result.

 Click (or tap) here to select a file

0

 Maximum file size is 192MB.

BINARY (no conv.) ▾ Destination character set for text files.

LF (Unk) ▾ Newline separator for encode each line separately and split lines into chunks.

- Encode each line separately (useful for multiple entries).
- Split lines into 76 character wide chunks (useful for MIME).
- Perform URL safe encoding (uses Base64URL format).

> ENCODE <

Tap in the grey box, and a file explorer window will open. Select your org chart pdf file.

Now, if you hover your mouse over the grey box you will see your filename appear, like a tool tip, and there will be a small green box in the bottom right corner with the number "1".

When you see this, click the green **> ENCODE <** button.

Encode files into Base64 format

Select a file to upload and process, then you can download the encoded result.

 Click (or tap) here to select a file

BaFin_OrgChart.pdf

1

Maximum file size is 192MB.

BINARY (no conv.) Destination character set for text files.

LF (Unix) Newline separator for encode each line separately and split lines into chunks.

Encode each line separately (useful for multiple entries).

Split lines into 76 character wide chunks (useful for MIME).

Perform URL safe encoding (uses Base64URL format).

> ENCODE <

You will then receive the following notification just under the Encode button:

> ENCODE <

Success!

CLICK OR TAP HERE to download the encoded file.

Please note that this file is removed from our system right after the first download attempt or 15 minutes of inactivity.

Click the highlighted text: **CLICK OR TAP HERE** to download a .txt file with your 64 bit conversion. Open this text file and you will see a quite large file that begins something like this:

 encoded-20200625060438.txt - Notepad

File Edit Format View Help

```
ÞVBERi0xLjcNCiW1tbW1DQoxIDAgb2JqDQo8PC9UeXB1L0NhdGFsb2cvUGFnZXMgMiA  
caEM89pxHxKyBGgkD1UchzTc6Mk4dGkcLkoe/GQcpjgOB4+Rk3HY4jgM/MNOxuGK41D  
fp/nKlivC1zotIqJicDqoUketro8oCtpc674G6PxDQ6hJCBoTfAkkZmv3SajmMvacD  
91/Q1fsqU8dz6jquEn0gTs5urhAam/RKoo4U1+5uKqVzAB38XZ8vth8Dv4ZXde/nuKqC  
RkVFK0NhbGlicmkvRW5jb2RpbmcvSWR1bnRpdHktSC9EZXNjZW5kYW50Rm9udHMgMTAg
```

Now to add this data into the XML, we will need to create a tag pair at the very end of the document.

Scroll all the way to the end to find this:

```

    <!-- ANNEX 3 - Other us
    <!--
    <eus:annexOtherInforma
    -->
</eus:annex>

</inEus>

```

ADD this tag pair **<datei></datei>** AFTER the final tag:

```

    <!-- ANNEX 3 - Other
    <!--
    <eus:annexOtherInform
    -->
</eus:annex>

</inEus>
<datei></datei>

```

Then, go back to your text file conversion, copy ALL the text in the document, and paste between the tags. Here is an extremely abbreviated version of what the result will look like:

```

    <!-- ANNEX 3 - Other useful information - ***This BOX is optional*** -->
    <!--
    <eus:annexOtherInformation></eus:annexOtherInformation>
    -->
</eus:annex>

</inEus>
<datei>JVBERi0xLjcNCiW1tbW1DQoxIDAgb2JqDQo8PC9UeXB1L0NhdGFsb2c...</datei>

```

Save your XML document. You are now ready to upload it!

How to UPLOAD your XML document

Log in to the portal at https://portal.mvp.bafin.de/MvpPortalWeb/app/login.html?locale=en_UK

(you can select English in the top left corner if switches to German)



Federal Fi
Superviso
MVP Po

Welcome to

Language

Deutsch

English

General information

Home

Your log-in i



Plea

Username:

Password:

Login

Click "Submit report":



Federal Financial
Supervisory Authority
MVP Portal

BaFin Reporting and Publishing Portal

Language

Deutsch

English

General information

Home

Documentation / Help

Logout

Specialised procedure

Inbox

Submit report

View journal

Application for a specialised
procedure

Cancel specialised procedure

Welcome to the Reporting and Publishing Portal of the German Federal Fi
between your site and BaFin in a secure and easy-to-use way.

You have been registered as a user for this service. As of now you can sti

The state of the reporting and processing of your data, as well as other ir

In order to make the reporting and gathering information easier for you,

If you are looking for technical advice or are encountering any problems,

mvj

However, we ask you to kindly note that we must confine communication
reporting within your organisation.

With best regards

BaFin Technical Team

And select from the top box (**Specialised procedure**). When you do, the second box of the web page will appear.

Select from the second box (**Registered persons/entities subject to the notification requirement**), and then the third box (**Submission**) when it appears. Doing so will automatically present the final two boxes on the page.

Then you will have the option of manually submitting a form (**Submit form**), which is what you do if you have a **correction** to make to an existing disclosure.

Otherwise, go to the last section (**Submit XML report**), click the **Choose file** box, and navigate to your XML upload document. Then click the **Submit file** button to the right.



Submit a report

Language

Deutsch

English

General information

Home

Documentation / Help

Logout

Specialised procedure

Inbox

Submit report

View journal

Application for a specialised procedure

Cancel specialised procedure

View application list

User account

Request new password

Edit user account

Change e-mail address

Close user account

Specialised procedure

Specialised procedure:

TEST: Notification of Major Holdings (sec. 33 et seq. WpHG) *

* mandatory field

Change selection

Registered persons/entities subject to the notification requirement

Person/Entity subject to the notification requirement:

FundApps Ltd, London [Application No.: 71130] *

* mandatory field

Change selection

Submission

Submission:

Notification of Major Holdings *

* mandatory field

Change selection

Submit form

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

Fill in form

Submit XML report

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

Choose file No file chosen

Submit file

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

And your results screen should show this:



Federal Financial
Supervisory Authority
MVP Portal

Submit a report

Language

Deutsch

English

General information

Home

Documentation / Help

Logout

Specialised procedure

Inbox

Submit report

View journal

Application for a specialised procedure

Cancel specialised procedure

View application list



File upload was successful.



The identification number of the report is: **14058213**

Entered data

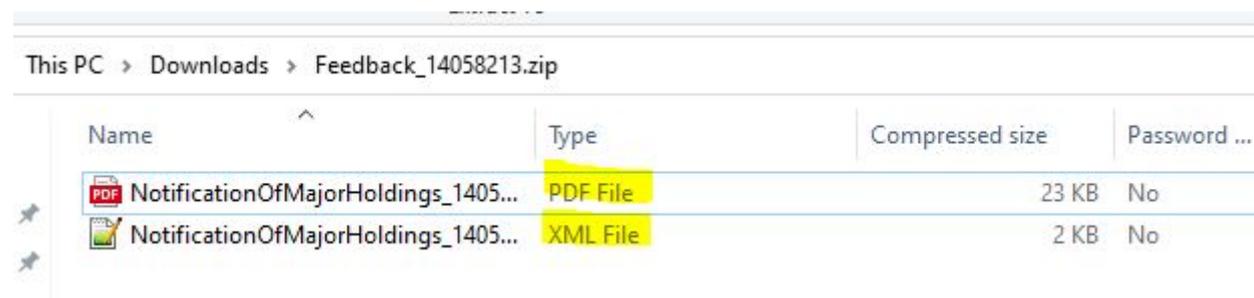
Specialised procedure: TEST: Notification of Major Holdings (sec. 33 et seq. WpHG)
Person/Entity subject to the notification requirement: FundApps Ltd, London
Submission: Notification of Major Holdings
Filename: BaFin TEST XML 2.xml
Filesize: 91,068 bytes

To collect the BaFin generated output documents you will need for disclosure to the issuer, click the highlighted “View journal” link at the left (making sure to note your highlighted report identification number in the blue coloured section of the screen).

| Id | Date of report | Specialised procedure | Submission | Person/Entity subject to the notification requirement | Client reference | Reporting channel | Filename | Status |
|-----------------|------------------------|---|--------------------------------|---|------------------|-------------------|------------------------------------|-----------------|
| 14058213 | 25/06/2020 13:45:26 | TEST: Notification of Major Holdings (sec. 33 et seq. WpHG) | Notification of Major Holdings | FundApps Ltd, London | | Web service | BaFin_Test_O... | Report accepted |
| | | Notification successful processed. | | | | | Feedback_14058213.zip (ZIP, 24 KB) | |
| 13973548 | 18/06/2020 19:05:55 | TEST: Notification of Major Holdings (sec. 33 et seq. WpHG) | Notification of Major Holdings | FundApps Ltd, London | | Web service | BaFin_Test_O... | Report accepted |
| | | Notification successful processed. | | | | | Feedback_13973548.zip (ZIP, 24 KB) | |
| 13950264 | 17/06/2020 17:30:14 | TEST: Notification of Major Holdings (sec. 33 et seq. WpHG) | Notification of Major Holdings | FundApps Ltd, London | | Web service | BaFin_Test_O... | Report accepted |

So you can see below that the same report number is marked as successful, and you can click the highlighted **Feedback_reportfilenumber.zip** file link at the right which will download the zip file. Open **and extract** both documents, ensure you are happy with them, then send them to the issuer.

Please note that the organisation chart has not been included in these issuer documents (issuers don't need it), the XML has been stripped of comments and unnecessary spaces and tabs, and the tags have had the "eus:" removed from them.



This PC > Downloads > Feedback_14058213.zip

| Name | Type | Compressed size | Password ... |
|---|----------|-----------------|--------------|
|  NotificationOfMajorHoldings_1405... | PDF File | 23 KB | No |
|  NotificationOfMajorHoldings_1405... | XML File | 2 KB | No |

The issuer-ready XML:

```
<?xml version="1.0" encoding="UTF-8"?><notificationOfMajorHoldings
  <language>en</language>
  <heading>
    <notificationReport/>
  </heading>
  <notification>
    <detailsOfIssuer>
      <name>Lufthansa Global Business Services GmbH</name>
      <lei>5299001M8IZ7PBJR1Y18</lei>
      <streetAndNumber>Lufthansa-Basis, Tor 21</streetAndNumber>
      <postalCode>60546</postalCode>
      <city>Frankfurt am Main</city>
    </detailsOfIssuer>
    <reasonForNotification>
      <acquisitionDisposalVotingRights/>
      <acquisitionDisposalInstruments/>
    </reasonForNotification>
    <detailsOfPersonSubject>
      <legalEntityList>
        <legalEntity>
          <name>FundApps Ltd</name>
          <cityOfRegisteredOffice>London</cityOfRegisteredOffice>
          <country>GB</country>
        </legalEntity>
      </legalEntityList>
    </detailsOfPersonSubject>
    <dateThreshold>2020-06-17</dateThreshold>
    <totalPositions>
```

And the PDF (yours will not have the word TEST at the top, nor the watermark):

TEST: Notification of Major Holdings



Bundesanstalt für
Finanzdienstleistungsaufsicht

- Notification of Major Holdings
or
 Correction of a notification of Major Holdings dated

1. Details of issuer (name, address)

| | |
|-------------------------------|---|
| Name | Lufthansa Global Business Services GmbH |
| Legal Entity Identifier (LEI) | 5299001M8IZ7PBJR1Y18 |
| Street, Street number | Lufthansa-Basis, Tor 21 |
| Postal code | 60546 |
| City | Frankfurt am Main |

2. Reason for notification (multiple reasons possible)

- Acquisition/disposal of shares with voting rights
 Acquisition/disposal of instruments

Congratulations! You are done.

If there are problems with your upload, they are normally easy to debug. Might be a formatting problem, or incompatible data added to a tag pair, or even a copy/paste that overwrites the start or the end of a tag pair. Here is a link to the XSD for the more technically inclined, otherwise please contact [support](#) for assistance.

<https://portal.mvp.bafin.de:444/services/ws/eus.xsd2.xsd>