



# Manual "OLSdigital" Investors

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## 0. Important information and legal foundations

### 0.1. Important information

Unless otherwise stated, the term “investor” includes any type of person subject to notification duty as well as a plural number of persons subject to notification duty. This means, in particular, that a group of investors is also covered by the term “investor”.

The parties or their legal representatives must assess the specific case in terms of disclosure duties. SIX Exchange Regulation AG is not authorised to provide binding information in the field of disclosure of shareholdings, i.e. in the non-self-regulated area.

This instruction manual relates to the submission of a disclosure notification on the designated “OLSdigital” platform, but not to correct and legally compliant disclosures.

The “review” of disclosure notifications by the Disclosure Office of SIX Exchange Regulation AG (“Disclosure Office”) therefore only represents a formal review, i.e. a review in terms of coherence and completeness of the disclosure notification. The Disclosure Office accepts no responsibility whatsoever for the content and correctness of disclosure notifications.

SIX Exchange Regulation AG accepts no responsibility for the correctness and completeness of this instruction manual. In particular, no responsibility is assumed for ensuring that the specified articles of law, legal foundations, links and other references are current, complete and applicable in the respective case.

Furthermore, SIX Exchange Regulation AG is not responsible for ensuring that disclosure notifications are correctly marked as “Most recent” or not “Most recent”. The issuers are responsible for submitting the correct information. The Disclosure Office reserves the right to point out any discrepancies in the information provided.

### 0.2. Legal foundations

Federal Act on Financial Market Infrastructures and Market Conduct in Securities and Derivatives Trading (Financial Market Infrastructure Act, [FinMIA](#))

Ordinance on Financial Market Infrastructures and Market Conduct in Securities and Derivatives Trading (Financial Market Infrastructure Ordinance, [FinMIO](#))

Ordinance of the Swiss Financial Market Supervisory Authority on Financial Market Infrastructures and Market Conduct in Securities and Derivatives Trading (FINMA Financial Market Infrastructure Ordinance, [FinMIO-FINMA](#))

Notices of the Disclosure Office ([Disclosure Office Notice III/99, III/00, etc.](#))

Rules for the Disclosure Office of SIX Swiss Exchange ([PDF](#))

Directive on Electronic Reporting and Publication Platforms, DERP ([PDF](#))

### **0.3. Additional links**

[Published disclosure notifications \("Significant Shareholders"\)](#)

[Reports and tools of the disclosure office](#)

[Communications of SIX Exchange Regulation and the Regulatory Board on the disclosure of shareholdings](#)

[Topics regarding the disclosure of shareholdings on the website of SIX Exchange Regulation \(ser-ag.com\)](#)

[Central Business Name Index \(zefix.ch; as a gateway to the relevant commercial register\)](#)

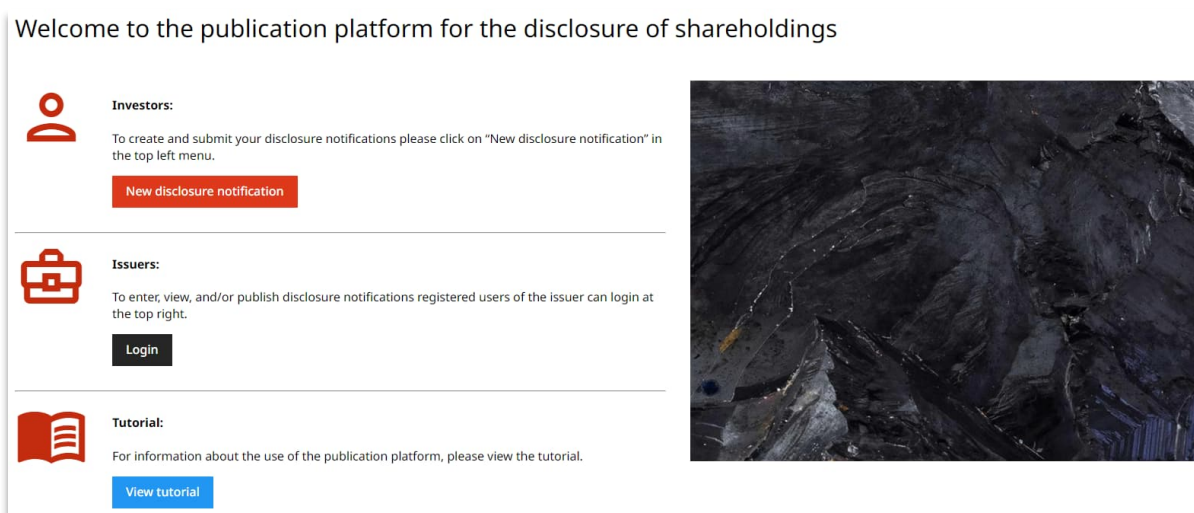
# 1. Creating a new disclosure notification

## 1.1. Starting the creation process

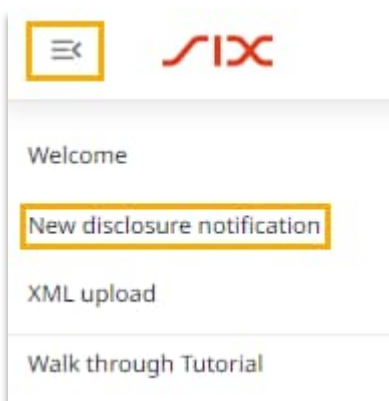
A disclosure notification is submitted in two steps:

- (1) The disclosure notification must first be *created* pursuant to this Chap. and then
- (2) *be completed* with the relevant information (see Chap. 2. et seqq.).

Click on “New disclosure notification” to create a new disclosure notification:



Alternatively, you can click on “New disclosure notification” in the menu at the top left:



## 1.2. Company selection

Under the first heading “Company selection”, select the name of the listed company to whose equity securities the disclosure notification relates.

**Company selection**

---

\*Mandatory field

Name of listed company \*

▼

If the issuer in question is not listed in the dropdown menu, please verify that the company is listed on SIX Swiss Exchange / SDX and make sure to search for the current company name.

This site is protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#) apply.

### 1.3. Type of investor

Under the second heading “Type of investor”, choose the type of investor for which the disclosure notification is to be created (see Chap. 4.5 - 4.7):

Company selection    **Type of investor**

---

\*Mandatory field

You can choose from three forms to file disclosure notifications. The form you choose depends on whether there is one or more beneficial owners or if it is a collective investment scheme.

New disclosure notification for \*

Single investor     Group of investors     Collective investment scheme/s

This site is protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#) apply.

The following options are available:

- **Single investor:** notification for a single investor, i.e. one beneficial owner. This selection is to be used if there is one beneficial owner (person subject to notification duty) or if Art. 18 para. 4 FinMIO-FINMA is applicable.
- **Group of investors:** notification for a group of investors. This selection is to be used if there is more than one beneficial owner (group subject to notification duty). The group must fulfil the notification duty under Art. 120 FinMIA as a group and issue a notification under Art. 121 FinMIA.

- **Collective investment scheme/s:** notification for one or more collective investment schemes. This selection is to be used for the notification of collective investment schemes within the meaning of Art. 18 para. 1/2/3 FinMIO-FINMA.

**Note:** The **type of investor can no longer be changed** during the submission of the disclosure notification. If it is erroneously selected during the creation of the disclosure notification, inappropriate fields will appear during data entry so that the submission process must be cancelled completely (see Chap. 9) and a new notification must be created according to this Chap. 1.

#### 1.4. Personal details

Fill in the details with **your contact information** as the author (“contact person”) of the disclosure notification according to Art. 23 FinMIO-FINMA. In the event of any questions or corrections, the Disclosure Office or issuer will contact you. Choose your **desired language of correspondence** for this purpose. The information will not be published.

**Note:** This does **not** concern the information regarding the **group representative** or the **investor**. This information is recorded later.

Read and accept the usage rules and click on “Create a new disclosure notification”.

After clicking on “Create a new disclosure notification”, you will receive an e-mail containing the **access link** to the new disclosure notification (see Chap. 2). This link will take you to the newly created disclosure notification where you can start entering the data.

\*Mandatory field

Please enter your contact details (will not be published)

**Contact Person**

<b>Last name *</b>	<b>First name *</b>
<input type="text"/>	<input type="text"/>
<b>Address *</b>	<b>Company</b>
<input type="text"/>	<input type="text"/>
<b>City *</b>	<b>Country *</b>
<input type="text"/>	<input type="text" value="▼"/>
<b>Phone number *</b>	<b>E-mail *</b>
<input type="text" value="▼"/> <input type="text"/>	<input type="text"/>
<b>Language of Correspondence *</b>	
<input type="radio"/> German <input type="radio"/> English <input type="radio"/> French	
<input type="checkbox"/> <a href="#">I accept the usage rules</a>	

**Back**

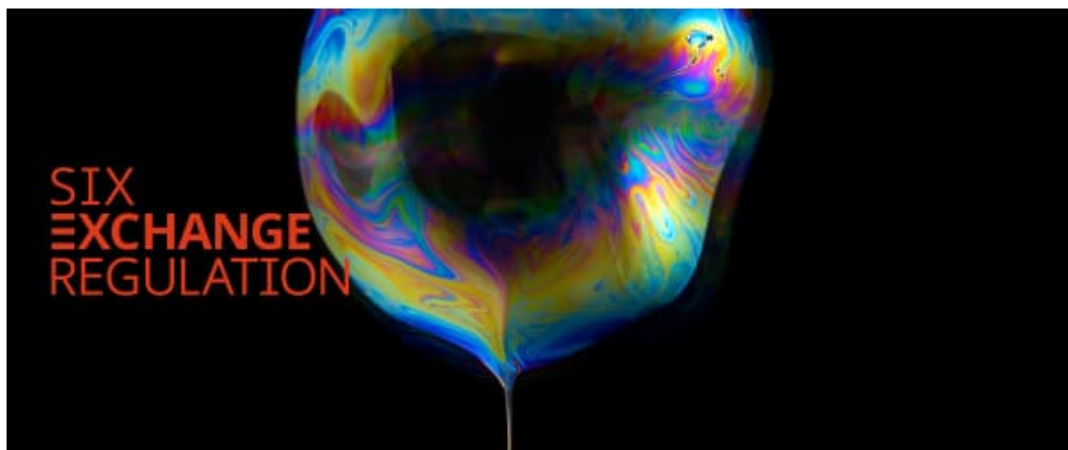
**Create a new disclosure notification**

This site is protected by reCAPTCHA and the Google [Privacy Policy](#) and [Terms of Service](#) apply.

## 2. Access to the “OLSdigital” platform / access link

After you have created the new disclosure notification (see Chap. 1), you will receive an automatic e-mail containing the access link to the “OLSdigital” platform.

**Note:** The access link is **personal and unique** to the respective disclosure notification. It is the only access link for the disclosure notification and must also be used for **re-accessing**, e.g. after closing the browser. **Save the e-mail** where it can easily be found again and **do not to share the access link with unknown persons**. If the notification is rejected (see Chap. 8), you will receive a corresponding message which also contains the access link.



Your disclosure notification has been created as a draft. Please visit the following website in order to complete and submit your disclosure notification:



Please be aware, that your disclosure notification will only be sent to the issuer and the disclosure office of SIX Exchange Regulation after your submission.

Yours sincerely

SIX Exchange Regulation AG  
Disclosure Office

### 3. Cockpit and navigation

#### 3.1. General information

You can navigate between different views and actions in the cockpit. Moreover, you can upload attachments, view the disclosure notification history and read any comments from the Disclosure Office or the issuer. The various views and actions are described in the following sub-chapters.

The actions are explained individually and in detail in Chap. 4 et seqq.

### Disclosure notification concerning a single investor

[Continue process](#) [View disclosure notification](#) [Delete draft disclosure notification](#) [Submit disclosure notification](#)

**General** **Contact person**

Disclosure notification ID	2531e0b5-9182-4f5b-bfbf-5351a64f4544
Type of investor	Single investor
Disclosure notification for issuer	TEST3

Disclosure notification history

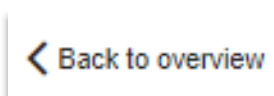
Status	Edited by	Date	Comment
Draft	Investor	12.02.2024 10:06:16	

Attachments

No attachments are available

[Upload file](#)

Clicking on “Back to overview” will take you back to the cockpit from the different views:



#### 3.2. Navigation and actions

The cockpit contains different buttons to access special views or carry out actions. Depending on the disclosure notification status, only the buttons or actions are displayed that are possible.

[Continue process](#) [View disclosure notification](#) [Delete draft disclosure notification](#) [Submit disclosure notification](#)

- **“Start process” / “Continue process”**: The submission process can be started or resumed if interrupted. For further information about the submission process, see Chap. 4. Also after a rejection, the notification can be processed again in this way (see Chap. 8).
- **“View disclosure notification”**: The disclosure notification is displayed without editing option. This view can be selected if necessary or is shown if the disclosure notification has been submitted or published: in this status it can no longer be edited (see Chap. 6).
- **“Withdraw disclosure notification”**: If the disclosure notification has been submitted for review by the Disclosure Office and the issuer, it can be withdrawn or published by the issuer at any time until the formal review has been completed (see Chap. 7). In the case of a withdrawal, it reappears as a draft and can be edited again.

**Note:** After the completion of the formal review by the Disclosure Office or the publication by the issuer, the notification can no longer be withdrawn. The published notification must then be corrected or deleted in a specifically designated process (see Chap. 10).

- **“Delete draft”**: The current draft of the disclosure notification can be **irreversibly** deleted and thereby the entire process can be **definitively** cancelled (see Chap. 9).

**Note:** After submission, the disclosure notification can no longer be deleted as a draft. In order for the disclosure notification to reappear as a draft so that it can be deleted, it must first be withdrawn before the formal review (see above “Withdraw disclosure notification”). Furthermore, the disclosure notification can be deleted again if it has been rejected by the issuer or the Disclosure Office (see Chap. 9). **Once published, the disclosure notifications can no longer be withdrawn and subsequently be deleted.** For information on deleting published disclosure notifications, see Chap. 10.

- **“Submit disclosure notification”**: The draft of the disclosure notification can be submitted for review by the Disclosure Office and the issuer (see Chap. 5).

**Note:** After submission, the disclosure notification can no longer be edited as a draft or be deleted. In order to edit or delete the disclosure notification, it must first be withdrawn before publication (see above “Withdraw disclosure notification”). Moreover, the disclosure notification can be edited or deleted if it has been rejected by the issuer or the Disclosure Office (see Chap. 8). **Once published, the disclosure notifications can no longer be withdrawn, edited or simply deleted.** For information on correcting and deleting published disclosure notifications, see Chap. 10.

### 3.3. Disclosure notification history

The disclosure notification history records the following information:

- Version of the disclosure notification (PDF)
- Status of the disclosure notification
- Editor
- Date and time of status update
- Comments

Disclosure notification history

Status	Edited by	Date	Comment
 Submitted	Investor	16.02.2024 10:56:04	
Draft	Investor	16.02.2024 10:56:04	

#### 3.3.1. Version of the disclosure notification and PDF generation

It is possible to generate a PDF of the version of the notification with “Draft”, “Submitted” and “Published” status. For the version of a draft a PDF can only be generated until the status is changed (e.g. to “Submitted”). For the version of the notification with “Rejected”, “Prepared” or “Obsolete” status no PDF can be generated. Clicking on the following symbol generates a PDF of the desired notification version:



For drafts:

Click on «View disclosure notification” and then on “PDF of current draft”:

**Disclosure notification concerning a single investor**

[Continue process](#) [View disclosure notification](#) [Delete draft disclosure notification](#) [Submit disclosure notification](#)

[← Back to overview](#)

## Disclosure notification concerning a Single investor

General	Contact person
Disclosure notification ID	dec01516-68bf-44ee-a63c-8eb03db2f6d8
Type of investor	Single investor
Disclosure notification for issuer	TEST3

Notification sections categories

**Expand All**

Single shareholder	▼
Date and reason	▼
Purchase positions	▼

[PDF of current draft](#)

### 3.3.2. Status

A disclosure notification can have one of six status types:

- **Draft:** either the disclosure notification was completely or partially entered, but not yet submitted for review. Or the disclosure notification was withdrawn before the formal review by the Disclosure Office was completed or the before the notification was published by the issuer. In “Draft” status, the notification can be edited or deleted.
- **Submitted:** the disclosure notification is undergoing a formal review by the Disclosure Office and the issuer. For further information regarding the submission, see Chap. 5. The disclosure notification can be withdrawn until the formal review by the Disclosure Office is completed or until it has been published by the issuer (see Chap. 7).
- **Rejected:** inconsistencies were found by the Disclosure Office during the formal review or by the issuer during its review, and the disclosure notification was rejected for editing. The disclosure notification can now be edited or deleted again. For further information, see Chap. 8 or Chap. 9.
- **Withdrawn:** the disclosure notification was successfully withdrawn before publication and completion of the formal review by the Disclosure Office (see Chap. 7). The disclosure notification can now be deleted or edited again.
- **Published:** the disclosure notification was published by the issuer either before or after the formal review by the Disclosure Office. The published disclosure notification can, if necessary, only be corrected and deleted in the manner specifically provided for this purpose(see Chap. 10).

- **Obsolete:** the originally published disclosure notification was corrected or deleted (see Chap. 10). This original and now obsolete notification can only be viewed. The deletion or correction notification was submitted by the issuer and is only displayed to the issuer.

### 3.3.3. Editor, date and time

For each status the affiliation of the person who processed the disclosure notification and the respective date and time of the action will be displayed.

The following personal affiliations exist:

- Investor
- Issuer
- Staff (Disclosure Office)

### 3.3.4. Comments

If the Disclosure Office or the issuer reject the disclosure notification for renewed editing, a comment is left. The comment can help you to improve the disclosure notification (see Chap. 8)

## 3.4. Attachments

Attachments, e.g. accompanying letters, may be uploaded or uploaded documents downloaded in the “Attachments” section under “Disclosure notification history” in order to provide information for the Disclosure Office and/or issuer.

**Note:** The requested content of a disclosure notification (Art. 22 FinMIO-FINMA) must be submitted as such in the disclosure notification (see Chap. 4). **Attachments are not published on the “Significant Shareholders” publication website. Attachments are intended to inform the Disclosure Office and/or issuer and cannot replace the submission of disclosure notification content.**

## 4. Submitting disclosure notifications

### 4.1. General information

After you have completed the steps in Chap. 1, you can access the “OLSdigital” platform using the access link/button in the automatic e-mail (see Chap. 2) and submit the disclosure notification.

Information on submitting a specific content in a disclosure notification can be found in the corresponding sub-chapters, depending on the “type of investor”:

- Chap. 4.5 “Submitting a disclosure notification for a single investor”
- Chap. 4.6 “Submitting disclosure notifications for groups”
- Chap. 4.7 “Submitting disclosure notifications for collective investment schemes”

**Note:** The information required for a submission depends on the choice made in the “type of investor” when the new disclosure notification was created (see Chap. 1.3). Once an incorrect **type of investor has been chosen during the submission process of the disclosure notification, it can no longer be changed and the process must be cancelled entirely (see Chap. 9)**. A new disclosure notification with the correct “type of investor” must be created in this case (see Chap. 1).

### 4.2. Starting (and continuing) the submission process

Click on the access link/button in the automatic e-mail (see Chap. 2) to go to the welcome page (on first access) or the cockpit (for subsequent access). When accessing for the first time, click on “Start process” on the welcome page to start the submission process for the disclosure notification.

To return to the cockpit of the disclosure notification press “Back to Cockpit” at any time during or after entering the data to be submitted (see Chap. 3).

The submission process can be interrupted at any time and resumed via the access link and cockpit (“Continue process”). If the entered data is not saved, it will be lost.

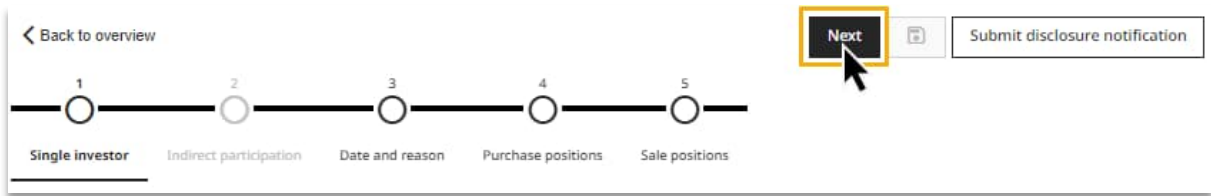
### 4.3. Navigating and saving parts of the disclosure notification

#### 4.3.1. Navigation

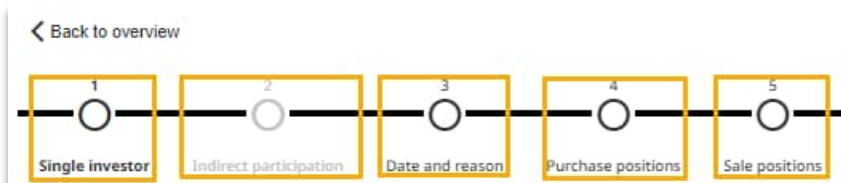
A disclosure notification is generally divided into five parts. Depending on the shareholdings and positions, not all parts have to be completed.

**Note:** A **logic** is implemented that **automatically activates or deactivates certain parts and input fields**, depending on the selection.  
For example, part 2 “Indirect participation” of a disclosure notification for a single investor is only activated if “Indirect participation” is selected in part 1. Moreover, part 4 “Purchase positions” and part 5 “Sale positions” are hidden, if the total shareholdings (altogether for purchase positions and sale positions) are lower than 3% in part 3 “Date and reason for the notification duty”.

If the disclosure notification is completed in the **designated sequence**, you can switch to the next part by clicking on “Next” after having fully completed one part. You will be asked if you want to save your entries:

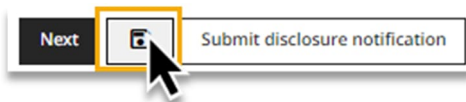


If the disclosure notification is completed in an **arbitrary sequence** or if a previous part has to be edited again, you can navigate by clicking on another part. When you click on another part, you will also be asked if you want to save your entries:

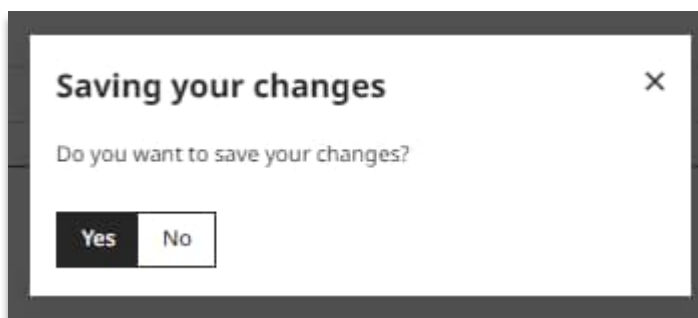


### 4.3.2. Saving

Save **regularly** by clicking on the save symbol to make sure no entries are lost.



When you click on “Next” or on another part, you will likewise be asked if you want to save your entries:



## 4.4. Calculation of shareholdings and basis of calculation


The **percentage values** in the disclosure notification are **calculated automatically** (see Chap. 4.4.2) according to the basis of calculation entered (see Chap. 4.4.1). The various positions are likewise added up automatically to produce a (sub-)total.

**Note:** The automatic calculation occurs **as soon as you save the entries** (see Chap. 4.3.2).

If the results of the automatic calculation do not correspond to the percentage values you want to report, please review the entered data, the basis of calculation and your own calculations. Should you still wish to submit different percentages and/or (sub-)totals, please submit a disclosure form (see Chap. 4.4.3).

### 4.4.1. Basis of calculation

The basis of calculation entered in part “Date and reason for the notification duty” is used to automatically calculate the shareholdings or percentage values:



The image shows a screenshot of a form field. The text above the field reads "Total number of shares pursuant to entry in the commercial register\*" followed by an information icon. The field itself is a rectangular box with a yellow border, currently empty.

Basis of calculation (Art. 14 para. 2 FinMIO-FINMA): Total number of voting rights pursuant to the entry in the commercial register or publication according to Art. 115 para. 3 FinMIO.

**Note:** In connection with the basis of calculation for reportable positions, further reference is made to [Disclosure Office Notice III/99](#).

#### 4.4.1.1. Companies incorporated in Switzerland

The **current and previous** total number of voting rights of companies incorporated in Switzerland can be found in the entry in the commercial register:

[Central Business Name Index \(zefix.ch; as a gateway to the relevant commercial register\)](https://www.zefix.ch)

#### 4.4.1.2. Companies incorporated abroad

For companies incorporated abroad Art. 115 para. 3 FinMIO is applicable. The total number of voting rights of companies incorporated abroad can be found under the “Static data” on the respective issuer’s webpage (<https://www.six-group.com/en/home.html> > Market Data > Shares > Share Explorer):

[Share Explorer](#)

Market Data | News & Tools | **Shares** | Bonds | ETFs | ETPs | Mutual Funds | Structured Products | Swiss Indices | Statistics | Data Services

Share Explorer | Closing Prices | Market Activity | List of Equity Issuers | IPO History | Consolidated Corporate Calendar | Separate Trading Lines | Sustainability Reporting

Products & Services > SIX Swiss Exchange > Market Data > Shares > Share Explorer

# Share Explorer

The share explorer allows you to compare stocks within an index or make index-independent comparisons.

Company, Symbol, ISIN:  Index:

More filters

279 results Last price as: 14:41:16 / 12.02.2024

After choosing the desired issuer **incorporated abroad**, you can find the total number of voting rights under the static data:

1 result Last price as: 15:24:32 / 12.02.2024

Company	Last	Change	Bid/Ask Vol	Bid/Ask price	On Book Vol	SwissAtMid Vol	EBBO Vol
<b>VPB VA</b> <b>IZN</b>	93.40	0.00%	9 / 1	93.40 / 93.80	1'299		

Data is 15 minutes delayed - Please read our [Market Data Disclaimer](#)

News & Data			Chart	Share Details	Orderbook	Company Details	Corporate Calendar
<b>Key Data</b>							
Valor symbol VPBN	Valor number 31548726	ISIN LI0315487269					
Trading currency CHF	Product type Foreign Shares	Trading since 06.05.2016					
Security type Registered Share	Smallest tradable unit 1	Security segment Foreign Shares					
Primary listed Yes							
<b>Profile</b>							
Issued by VP Bank AG	Number in issue <del>6'011'000</del>	Nominal value 10.00 CHF					
Dividend entitlement Yes	Regulatory standard International Reporting Standard						
Dividend <span style="float: right;">+</span>							
REPORTED CAPITAL							
Listed share capital (in units)							<del>6'011'000</del>
Listed share capital							CHF 60'150'000
COMMERCIAL REGISTER							
Share capital (in units)							12'019'167
Share capital							CHF 66'154'167

#### 4.4.2. Automatic calculation

The **percentage values** in the disclosure notification are **calculated automatically** according to the basis of calculation entered in part "Date and reason" (see Chap. 4.4.1). The various positions are likewise added up automatically to produce a (sub-)total.

**Note:** The automatic calculation occurs as soon as you save the entries.

[Back to overview](#)

[Back](#)
[Next](#)
📄
[Submit disclosure notification](#)

1 — 2 — 3 — 4 — 5  
 Single investor   Indirect participation   Date and reason   **Purchase positions**   Sale positions

\*Mandatory field

**Subcategories**

Equity securities or equity related securities

Type of shares *	Number of shares *	Number of voting rights *	Percentage of voting rights
Bearer share	100	100	%

Of the equity securities mentioned above, the following part is held due to securities lending and similar transactions (Art. 17 FinMIO-FINMA)

Total number of voting rights:   
 Total percentage of voting rights:

[Back to overview](#)

[Back](#)
[Next](#)
📄
[Submit disclosure notification](#)

1 — 2 — 3 — 4 — 5  
 Single investor   Indirect participation   Date and reason   **Purchase positions**   Sale positions

\*Mandatory field

**Subcategories**

Equity securities or equity related securities

Type of shares *	Number of shares *	Number of voting rights *	Percentage of voting rights
Bearer share	100	100	10 %

Of the equity securities mentioned above, the following part is held due to securities lending and similar transactions (Art. 17 FinMIO-FINMA)

Total number of voting rights:   
 Total percentage of voting rights:

### 4.4.3. Manual calculation

If the results of the automatic calculation do not correspond to the percentage values you want to report, please review the entered data, the basis of calculation and your own calculations. Should you still wish to submit different percentages and/or (sub-)totals, please submit a disclosure form.

You can find the forms [here](#).

## 4.5. Submitting a disclosure notification for a single investor

The information required for a submission depends on the choice made in the “type of investor” when the new disclosure notification was created (see Chap. 1.3). You can find specific information on submitting a disclosure notification for a **single investor** in the following sub-chapters:

**Welcome !**

Welcome to the publication platform for your new disclosure notification. Here you can enter, view, and submit your disclosure notification.

**Your disclosure notification**

[General](#) [Contact person](#)

Disclosure notification ID	cc24773a-b2e1-42c8-8c22-8e8d8b561b67
Type of investor	Single investor
Disclosure notification for issuer	TEST3

[Start process](#) [View tutorial](#)

You can either start the submission process ("Start process") or view the tutorial regarding the use of the platform ("View tutorial").

**Disclosure notification concerning a single investor**

[Start process](#) [View disclosure notification](#) [Delete draft disclosure notification](#)

If you are submitting a disclosure notification for a different type of investor, please refer to the relevant chapter:

- Chap. 4.6 “Submitting disclosure notifications for groups”
- Chap. 4.7 “Submitting disclosure notifications for collective investment schemes”

If you intend to make a disclosure notification for a **different (incorrect) type of investor**, you need to create a **new disclosure notification** (see Chap. 1). Once an incorrect type of investor has been chosen during the submission process of the disclosure notification, it can no longer be changed and the process must be cancelled entirely. Please cancel the process and delete the draft notification (see Chap. 9).

### 4.5.1. Part 1: Person subject to notification duty

The following information must be disclosed in this part:

Surname, first name, residential address or company and registered office of the beneficial owner (Art. 120 para. 1 FinMIA) and/or the person authorised with voting rights that can be exercised with full discretionary powers (Art. 120 para. 3 FinMIA).

Choose between a natural person or a company (legal person) and complete all fields.

Beneficial owner/s OR Person/s who has/have full discretionary powers to exercise the voting rights

Person subject to notification duty

Legal person /entity \*

Single person  Company

In case of an indirect purchase or an indirect sale (Art. 11 FinMIO-FINMA), please check the “Indirect participation” box (see Chap. 4.5.2).

Beneficial owner/s OR Person/s who has/have full discretionary powers to exercise the voting rights

Person subject to notification duty

Legal person /entity \*

Single person  Company

Last name \*

First name \*

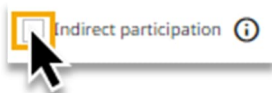
City \*

Country \*

Indirect participation ⓘ

#### 4.5.2. Part 2: Indirect participation (where applicable)

In case of an indirect purchase or an indirect sale (Art. 11 FinMIO-FINMA), please check (if not done already) the “Indirect participation” box in **part 1** and switch to the next part 2 (see Chap. 4.5.1):



Enter the first person directly involved. Choose between a natural person or a company (legal person) and complete all fields.

Click on the plus symbol to add further persons directly involved:

### 4.5.3. Part 3: Date and reason for the notification duty

Fill in at least all mandatory fields (\*) and select at least one entry:

1. Choose the "Date of the event triggering the notification duty".
2. Choose "Date of transfer of equity securities (if different from date of the act that creates the obligation to notify)".
3. Choose at least one of the trigger events for the notification duty (Art. 22 para. 1 letter b FinMIO-FINMA). Enter precise information when selecting "Other". Likewise, the other reasons may be described in further detail in the text field.
4. Fill in "Total number of shares pursuant to entry in the commercial register" as the basis of calculation (see Chap. 4.4.1). This basis of calculation is then used for the automatic calculation of the purchase and sale positions (see Chap. 4.4.2).

**Note:** In case of a disclosure notification that **falls short of the threshold of 3%** (total for purchase **and** sale positions), the "Total voting rights <3% (total for purchase AND sale positions)" box can be checked. **No basis of calculation** must and can be entered. The **parts 4 and 5** "purchase positions" and "sale positions" **must and can no longer be filled in** in this case, and the disclosure notification may already be submitted (see Chap. 5).

### 4.5.4. Part 4: Purchase positions

In this part, the purchase positions according to Art. 14 para. 1 letter a FinMIO-FINMA must be entered. The addition of voting rights from the various positions to produce a (sub-)total and the calculation of percentage values of the individual and total purchase positions according to the basis of calculation occur automatically (see Chap. 4.4.2).

The following three subcategories may be entered as positions:

- Equity securities or equity-related securities (if applicable, indicating the part of the equity securities that result from securities lending and comparable transactions)
- Voting rights that can be exercised with full discretionary powers
- Derivative holdings (if applicable, indicating the part of the derivative holdings that result from securities lending and comparable transactions)

Click on the corresponding slider to enter positions in a subcategory:

**Subcategories**

- Equity securities or equity related securities
- Voting rights that can be exercised with full discretionary powers ⓘ
- Derivative holdings ⓘ

#### 4.5.4.1. Equity securities or equity-related securities and equity securities resulting from securities lending and comparable transactions

Fill in all the fields for the equity securities or equity-related securities.

If there are equity securities of different categories (bearer/registered shares), click on the plus symbol to add the equity securities of the other category.

**Subcategories**

Equity securities or equity related securities

Type of shares *	Number of shares *	Number of voting rights *	Percentage of voting rights
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Of the equity securities mentioned above, the following part is held due to securities lending and similar transactions (Art. 17 FinMIO-FINMA)

In case **these equity securities** include certain equity securities resulting from **securities lending and comparable transactions** (Art. 17 FinMIO-FINMA), click on the slider “Of the equity securities mentioned above, the following part is held due to securities lending and similar transactions (Art. 17 FinMIO-FINMA):” and fill in all the fields:

Subcategories

Equity securities or equity related securities

Type of shares \*      Number of shares \*      Number of voting rights \*      Percentage of voting rights

Of the equity securities mentioned above, the following part is held due to securities lending and similar transactions (Art. 17 FinMIO-FINMA)

Nature of the legal transaction \*      Number of shares \*      Number of voting rights \*      Percentage of voting rights

Agreed date of return transfer      Exercise of right lies with

dd.MM.yyyy

If one of the following options is applicable, enter either the time of return transfer or, if there is a right to choose, to whom it belongs. After making the selection, the other field is automatically blocked.

#### 4.5.4.2. Voting rights that can be exercised with full discretionary powers

If voting rights that can be **exercised with full discretionary powers** were transferred **by a third party** (Art. 120 para. 3 FinMIA), you can enter these in this subcategory.

Subcategories

Equity securities or equity related securities

Voting rights that can be exercised with full discretionary powers ⓘ

Number of voting rights \*      Percentage of voting rights

Is the person who has full discretionary powers to exercise voting rights directly or indirectly controlled?\*

Yes       No

Derivative holdings ⓘ

Besides the number of voting rights, it must be disclosed if the person authorised to exercise voting rights with full discretionary powers is directly or indirectly controlled. If the option “Yes” is selected, it must further be disclosed whether the disclosure notification is consolidated within the meaning of Art. 10 para. 2 clauses 2 and 3 FinMIO-FINMA.

**Notes:** The number of voting rights disclosed in this chapter **must not additionally be disclosed under “Equity securities or equity-related securities”** (“either above or below”). This means that **the number of voting rights that can be exercised with full discretionary powers** according to this subcategory are **added up with the**

**“equity securities or equity-related securities” (if applicable) and the derivative holdings (if applicable) for the total of all purchase positions in part 4.**

#### **4.5.4.3. Derivative holdings and, if applicable, derivative holdings from securities lending and comparable transactions**

Conversion and purchase rights, in particular call-options, granted (written) sale rights and other equity derivatives must be entered in this subcategory (see Art. 15 para. 2 letter a - c FinMIO-FINMA). Fill in the fields completely in each case. Click on the plus symbol to add derivative holdings:



The type of derivative, the number of derivatives and the number of voting rights concerned must be entered. It is also possible to select whether the derivative has an ISIN or not.

**If the derivative has an ISIN**, only this information needs to be entered (Art. 22 para. 2 letter c FinMIO-FINMA).

**If the derivative has no ISIN**, the additional fields need to be filled in (Art. 22 para. 2 letter d FinMIO-FINMA).

**Derivative holdings** ⓘ

Type of rights\*    Number of rights\*    Number of reported voting rights\*    Percentage of reported voting rights

ISIN\*

Yes     No

Identity of the issuer\*    Subscription ratio\*    Exercise price\*    Exercise period\*    Exercise type\*

Remarks

Of the derivative holdings mentioned above, the following part is held due to securities lending and similar transactions (Art. 17 FinMIO-FINMA)

In case **these derivative holdings** include certain derivatives resulting from **securities lending and comparable transactions** (Art. 17 FinMIO-FINMA), click on the slider “Of the equity securities mentioned above, the following part is held due to securities lending and similar transactions (Art. 17 FinMIO-FINMA):” and fill the fields completely:

**Derivative holdings** ⓘ

Type of rights\*    Number of rights\*    Number of reported voting rights\*    Percentage of reported voting rights

ISIN\*

Yes     No

Identity of the issuer\*    Subscription ratio\*    Exercise price\*    Exercise period\*    Exercise type\*

Remarks

Of the derivative holdings mentioned above, the following part is held due to securities lending and similar transactions (Art. 17 FinMIO-FINMA)

Nature of the legal transaction\*    Number of rights\*    Number of reported voting rights\*    Percentage of reported voting rights

Agreed date of return transfer    Exercise of right lies with

If one of the following options is applicable, enter either the time of return transfer or, if there is a right to choose, to whom it belongs. After making the selection, the other field is automatically blocked.

#### 4.5.5. Part 5: Sale positions

Sale rights, in particular put-options, granted (written) conversion and purchase rights and other derivative holdings must be entered in this part (see Art. 15 para. 2 letter a-c FinMIO-FINMA).

For the submission of sale positions, refer to “Derivative holdings and, if applicable, derivative holdings from securities lending and comparable transactions” in Chap. 4.5.44.5.4.3.

#### 4.6. Submitting disclosure notifications for groups

The information required for a submission depends on the choice made in the “type of investor” when the new disclosure notification was created (see Chap. 1.3). You can find specific information on submitting a disclosure notification for a **group of investors** in the following sub-chapters:

**Welcome !**

Welcome to the publication platform for your new disclosure notification. Here you can enter, view, and submit your disclosure notification.

**Your disclosure notification**

General Contact person

Disclosure notification ID	cc32b4da-08dc-43d2-a167-0ff6d26e32d2
Type of investor	Group of investors
Disclosure notification for issuer	TEST3

Start process View tutorial

You can either start the submission process ("Start process") or view the tutorial regarding the use of the platform ("View tutorial").

**Disclosure notification concerning a group**

Start process View disclosure notification Delete draft disclosure notification

If you are submitting a disclosure notification for a different type of investor, please refer to the relevant chapter:

- Chap. 4.5 “Submitting a disclosure notification for a single investor”
- Chap. 4.7 “Submitting disclosure notifications for collective investment schemes”

If you intend to make a disclosure notification for a **different (incorrect) type of investor**, you need to create a **new disclosure notification** (see Chap. 1). Once an incorrect type of investor has been

chosen during the submission process of the disclosure notification it can no longer be changed and the process must be cancelled entirely. Please cancel the process and delete the draft notification (see Chap. 9).

#### 4.6.1. Part 1: Persons subject to notification duty, understanding and representation

The following information must be disclosed in this part:

Surname, first name, residential address or company and registered office of the beneficial owner (Art. 120 para. 1 FinMIA) and/or the persons authorised with voting rights that can be exercised with full discretionary powers (Art. 120 para. 3 FinMIA).

Choose between a natural person or a company (legal person) in each case and fill in the fields completely.

Beneficial owner/s OR Person/s who has/have full discretionary powers to exercise the voting rights

Person subject to notification duty

Legal person /entity\*

Single person  Company

Last name\*  First name\*

City\*  Country\*

Person subject to notification duty

Legal person /entity\*

Single person  Company

Company\*

City\*  Country\*

Click on the plus symbol to add further persons:

In case of an indirect purchase or an indirect sale (Art. 11 FinMIO-FINMA), please check the "Indirect participation" box (see Chap. 4.6.2):

Indirect participation

After entering all group members, choose the “type of understanding”. A description must be entered in the text field if “Other” is selected. Likewise, the other types of understanding may be described in further detail in the text field.

Please enter the group representative according to Art. 121 letter d FinMIA. You can again choose between a natural person or a company (legal person).

#### 4.6.2. Part 2: Indirect participation (where applicable)

In case of an indirect purchase or an indirect sale (Art. 11 FinMIO-FINMA), please place a tick for “Indirect participation” in **part 1** and switch to the next part:

Click on the plus symbol in part 2 to add further persons directly involved:

#### 4.6.3. Parts 3–5: See Chap. 4.5.3–4.5.5

The submission of parts 3 to 5 is identical to the submission process for a disclosure notification for a single investor. Accordingly, reference is made to Chap. 4.5.3 - 4.5.5 on submitting a disclosure notification for a single investor.

## 4.7. Submitting disclosure notifications for collective investment schemes

The information required for a submission depends on the choice made in the “type of investor” when the new disclosure notification was created (see Chap. 1.3). You can find specific information on submitting a disclosure notification for **collective investment schemes** in the following sub-chapters:

**Welcome !**

Welcome to the publication platform for your new disclosure notification. Here you can enter, view, and submit your disclosure notification.

**Your disclosure notification**

General Contact person

Disclosure notification ID	d7291f2e-6638-4302-8c94-04a6e5fc5bae
Type of investor	Collective investment scheme/s
Disclosure notification for issuer	TEST3

Start process View tutorial

You can either start the submission process ("Start process") or view the tutorial regarding the use of the platform ("View tutorial").

### Disclosure notification concerning collective investment scheme(s)

Start process View disclosure notification Delete draft disclosure notification

If you are submitting a disclosure notification for a different type of investor, please refer to the relevant chapter:

- Chap. 4.5 “Submitting a disclosure notification for a single investor”
- Chap. 4.6 “Submitting disclosure notifications for groups”

If you intend to make a disclosure notification for a **different (incorrect) type of investor**, you need to create **a new disclosure notification** (see Chap. 1). Once an incorrect type of investor has been chosen during the submission process of the disclosure notification, it can no longer be changed and the process must be cancelled entirely. Please cancel the process and delete the draft notification (see Chap. 9).

### 4.7.1. Certain legal foundations regarding disclosure for collective investment schemes

In case of disclosure notifications for collective investment schemes, please note – **among other legal foundations** – Art. 18 FinMIO-FINMA:

“Art. 18 Collective investment schemes

(Art. 120 para. 1, Art. 121, Art. 123 para. 1 FinMIA)

<sup>1</sup> The notification duties under Art. 120 para. 1 FinMIA for shareholdings held by approved collective investment schemes under the Collective Investment Schemes Act of 23 June 2006 (CISA) must be met by the license holder (Art. 5 para. 1 in conjunction with Art. 2 para. 1 letter d FinIA, Art. 13 para. 2 letters a-d CISA and Art. 15 para. 1 letter e in conjunction with Art. 120 para. 1 CISA).

<sup>2</sup> Fulfilling the notification duty involves:

- a. Notification duties for more than one collective investment scheme of the same licence holder shall be fulfilled comprehensively (i.e. including all collective investment schemes) and for each collective investment scheme if they individually reach, exceed or fall below relevant thresholds.
- b. Fund management companies within a group of companies are not required to aggregate their holdings with the holdings of said group of companies.
- c. The notification duty of externally managed investment companies with variable capital (SICAV) is met by the fund management company.
- d. Each sub-fund of an open-ended collective investment scheme with sub-funds qualifies as an individual collective investment scheme under paragraph 1.

<sup>3</sup> For foreign collective investment schemes not approved for offer which do not depend on a group of companies, the notification duties in Article 120 paragraph 1 FinMIA shall be met by the fund management company or the legal entity itself. The requirements of paragraph 2 apply.

<sup>4</sup> For foreign collective investment schemes not approved for offer which depend on a group of companies, the reporting requirements in Article 120 paragraph 1 FinMIA are met by the group.

<sup>5</sup> The independence of the fund management company or the legal entity is contingent on the following:

- a. *personal independence*: Persons controlling the exercise of the voting right for the fund management company or legal entity act independently of the group parent company and those companies under its control;
- b. *organisational independence*: The group ensures through its organisational structures:
  1. that the group parent company and other companies under its control do not influence the fund management company or legal entity in exercising voting rights either through instructions or by any other method, and
  2. that no information is exchanged or disseminated between the fund management company or legal entity and the group parent company or other companies under its control which could influence the exercise of voting rights.

<sup>6</sup> The group of companies must provide the competent disclosure office with the following documents for those cases under paragraph 3:

- a. a list of names of the fund management companies or legal entities;
- b. a declaration that the independence requirements in paragraphs 3 and 5 are fulfilled and maintained.

<sup>7</sup> The group of companies must provide the competent disclosure office with details of every change to the list under paragraph 6 letter a.

<sup>8</sup> For those cases under paragraph 3, the competent disclosure office may request further documentation supporting compliance with the independence conditions at any time.

<sup>9</sup> Details of the investor's identity are not required."

#### 4.7.2. Part 1: Licence holder

The following information must be disclosed in this part:

Company and registered office of the licence holder, or in the case of foreign collective investment schemes not approved for sale, which do not depend on a group of companies, the company and registered office of the fund management company or legal entity (see Chap. 4.7.1).

**Note:** If Art. 18 para. 4 FinMIO-FINMA is applicable, the disclosure notification must be submitted for a single investor (see Chap. 1.3 & 4.5).

#### 4.7.3. Part 2: Collective investment scheme(s) (if applicable)

Enter the name of those collective investment schemes (if applicable) **which hold 3% or more of the voting rights individually**.

Name of collective investment scheme/s which hold/s individually 3% or more voting rights

Collective investment scheme/s

Click on the plus symbol to add further collective investment schemes:

**Note:** If "Voting rights total <3% (total of purchase AND sale positions)" is selected in Part 3, no collective investment schemes can logically be disclosed that hold **3% or more** of the voting rights individually. See the information in Part 3.

Voting rights total <3% (total of purchase AND sale positions)

#### **4.7.4. Parts 3–5: See Chap. 4.5.3 - 4.5.5**

The submission of parts 3 - 5 is identical to the submission process for a disclosure notification for a single investor. Accordingly, reference is made to Chap. 4.5.3 - 4.5.5 on submitting a disclosure notification for a single investor.

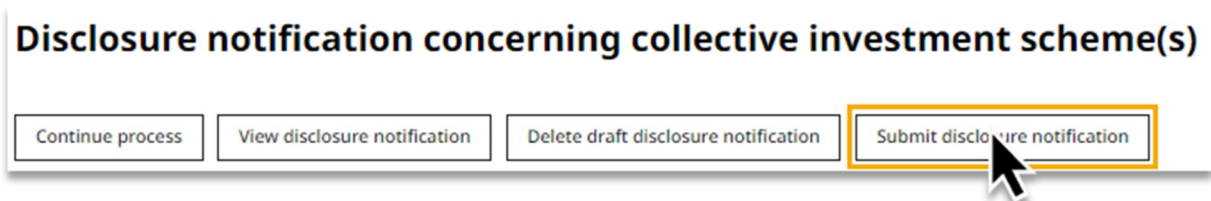
## 5. Submitting disclosure notifications

After you have entered all the information for the disclosure notification, you can submit the disclosure notification for review. After submission, the disclosure notification will be sent to the issuer and the Disclosure Office for a formal review. The issuer can publish the disclosure notification directly or wait for the completion of the formal review by the Disclosure Office. If the issuer or the Disclosure Office finds inconsistencies, the disclosure notification can be rejected for correction. The disclosure notification must then be corrected as described in Chap. 8.

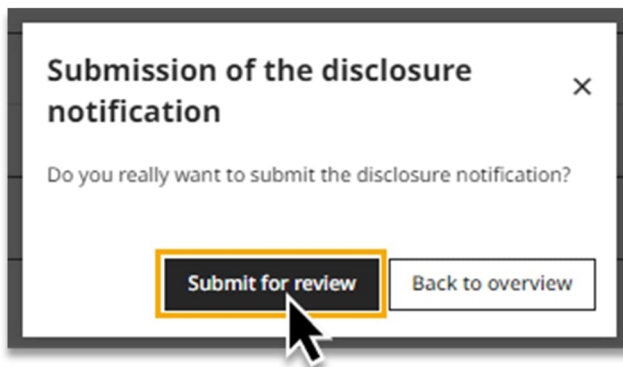
The disclosure notification is submitted by clicking on “Submit disclosure notification” in the top right:



You can also submit the disclosure notification in the cockpit:



Click on the confirmation that appears to submit the disclosure notification:



**Note:** After submission or during review, the disclosure notification can no longer be edited as a draft or be irreversibly deleted. In order to edit or irreversibly delete the disclosure notification, it must first be withdrawn before publication by clicking on the button “Withdraw disclosure notification”. Moreover, the disclosure notification can be edited or deleted again if it has been rejected by the issuer or the Disclosure

Office (see Chap. 8 and Chap. 9). **After publication, disclosure notifications can no longer be withdrawn, edited and simply deleted.** The published disclosure notification can now only be corrected and deleted in the manner specifically provided for this purpose (see Chap. 10).

After submission, the status of the disclosure notification in the “Disclosure notification history” will switch to “Submitted”.

Disclosure notification history

Status	Edited by	Date	Comment
 Submitted	Investor	13.02.2024 11:28:50	
Draft	Investor	13.02.2024 10:57:17	

## 6. Viewing disclosure notifications

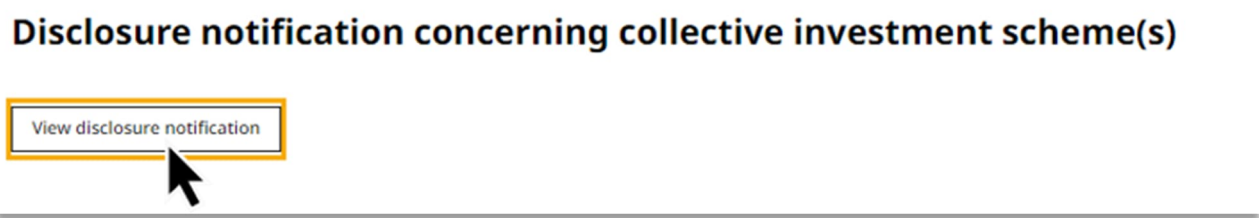
The disclosure notification can be displayed without the option to edit. This may be necessary after submission in particular. To do so, click on “View disclosure notification” in the cockpit.

If the **disclosure notification has not been submitted yet**, you can access the editable version of the disclosure notification using the button “Continue process”.

If you discover a mistake but the disclosure notification has already been submitted, you must withdraw the disclosure notification for further editing or deletion. **Withdrawal is only possible before publication and completion of the formal review by the Disclosure Office**, see Chapter 7 and Chapter 10 for further information. The disclosure notification can also be edited or deletion if it has been rejected by the issuer or the Disclosure Office (see Chapter 8 and Chapter 9).

### Disclosure notification concerning collective investment scheme(s)

View disclosure notification



## 7. Withdrawing disclosure notifications

**After the submission** or during review, the **disclosure notification can no longer be edited** as a draft or be irreversibly **deleted**. In order to edit or irreversibly delete the disclosure notification, it must first be withdrawn **before publication and completion of the formal review by the Disclosure Office** by clicking on the button “Withdraw disclosure notification”:

### Disclosure notification concerning collective investment scheme(s)



The disclosure notification will then return to “draft” status.

**Note:** **After publication, disclosure notifications can no longer be withdrawn, edited and simply deleted.** The published disclosure notification can now only be corrected and deleted in the manner specifically provided for this purpose (see Chap. 10).

## 8. Correcting disclosure notifications

After submission, the disclosure notification will be sent to the issuer and the Disclosure Office for review. After completing its review, the issuer can publish the disclosure notification directly or wait for the completion of the formal review by the Disclosure Office. If the issuer or the Disclosure Office finds inconsistencies, the disclosure notification can be rejected for correction. A **comment** must then be left, which is displayed in the “Disclosure notification history” in the cockpit. The author of the comment is also visible (i.e. the issuer or Disclosure Office in column “Edited by”). The disclosure notification now has “Rejected” status and can be amended using the button “Continue process”.

Disclosure notification history

Status	Edited by	Date	Comment
<u>Rejected</u>	Staff	08.02.2024 11:11:01	<a href="#">See comment</a>
 Submitted	Issuer	08.02.2024 08:49:20	
Draft	Issuer	07.02.2024 16:38:59	

The disclosure notification can be corrected and submitted in the same way as during the original submission process (see Chap. 4 and Chap. 5).

## 9. Deleting (draft) disclosure notifications and cancelling submission

If you wish to **definitively** cancel the submission process before submission (see Chap. 5), after a withdrawal (see Chap. 7) or after a rejection and **irreversibly** delete the draft disclosure notification, click on “Delete draft” (“Draft” status) or on “Delete rejected disclosure notification” (“Rejected” status) in the cockpit.

**Note:** **Deletion is irreversible.** If, following a deletion, a disclosure notification should be submitted after all, the whole process must be started again (see Chap. 1). The access link for accessing the disclosure notification (see Chap. 2) can no longer be used after deletion.

### Disclosure notification concerning a single investor

Start process

View disclosure notification

Delete draft disclosure notification

### Disclosure notification concerning a single investor

Continue process

View disclosure notification

Delete rejected disclosure notification

Submit disclosure notification

## 10. Correcting and deleting published disclosure notifications

If a disclosure notification was submitted and then published, you can no longer correct or delete it using the “OLSdigital” platform. Only the issuer can then carry out corrections and deletions of disclosure notifications. In order to implement a correction or deletion of the disclosure notification, the issuer and the Disclosure Office must be informed accordingly (via e-mail to [disclosure-office@six-group.com](mailto:disclosure-office@six-group.com)).

**Note**      **Correcting and deleting** a disclosure notification **must be carried out as described above**. It is **not possible to correct or cancel** a published disclosure notification **by creating and submitting a new disclosure notification** that refers to the previous disclosure notification.