

## **BaFin Three-Point- Declaration for CEU Disclaimer**

This document has been prepared exclusively for the benefit and internal use of clients of Clearstream Banking S.A. and Clearstream Europe AG and must not be further distributed or duplicated in whole or in part by any means without the prior written consent of Clearstream, except to the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin) in relation to requirements of BaFin Circulars 05/2020 (WA) on the tasks and duties of the depositary according to chapter 1 part 3 of the German Investment Code.

It is neither intended to provide any representation or declaration with respect to the content or completeness of the received Three-Point Declarations nor to confirm any compliance with the requirements as set out in BaFin Circular 05/2020. Any information contained herein must not be relied upon in this regard. Clients should seek appropriate professional advice where necessary before taking any action based on or arising from the information contained in this document or any Three-Point Declaration.

Clearstream therefore makes no guarantees, representations or warranties and accepts no responsibility or liability as to the veracity, accuracy or completeness of this document and the Three-Point Declarations and under no circumstances will be liable for any loss or damage caused by reliance on any information published in this document or any Three-Point Declaration.

Market, depository code and link information		Custodian	Sub-custodian CSD	
Austria				
CSD-A	Direct CASCADE link to Österreichische Kontrollbank CSD GmbH (OeKB CSD, Vienna, Austria)	n/a	n/a	OeKB CSD GmbH
Belgium				
CSD-B	Direct CASCADE link to National Bank of Belgium (NBB)	n/a	n/a	National Bank of Belgium
CSD-B	Direct CASCADE link to Euroclear Belgium (EBE, Brussels)	n/a	n/a	Euroclear Belgium
Croatia				
83	Relayed link via Clearstream Banking SA, Luxembourg to Central Depository and Clearing Company Inc. (CDCC)	Clearstream Banking SA	n/a	Central Depository and Clearing Company Inc. (CDCC)
Cyprus				
15	Relayed link via Clearstream Banking SA, Luxembourg to Cyprus Stock Exchange	Clearstream Banking SA	n/a	Cyprus Stock Exchange
Denmark				
CSD-DK	Direct CASCADE link to VP Securities A/S (VP, Copenhagen, Denmark)	n/a	n/a	VP Securities A/S
Estonia				
CSD-EE	Direct CASCADE link to Nasdaq CSD SE (Estonian branch)	n/a	n/a	Nasdaq CSD SE (Estonian branch)

Market, depository code and link information		Custodian	Sub-custodian	CSD
<b>Finland</b>				
CSD-FIN	Indirect CASCADE link: Clearstream Banking SA (CBL) with direct link to Euroclear Finland Ltd	Clearstream Banking SA	n/a	Euroclear Finland Ltd <sup>1</sup>
<b>France</b>				
CSD-F	Direct CASCADE link to Euroclear France (EFR, Paris)	n/a	n/a	Euroclear France S.A. (formerly Sicovam)
FR-LuxCSD	Direct link to LuxCSD for holding selected registered shares (VEN).	LuxCSD	n/a	Euroclear France S.A. (formerly Sicovam)
<b>Greece</b>				
CSD-GR	Direct link to Bank of Greece settlement system (BOGS)	n/a	n/a	Bank of Greece (BOGS)
<b>Ireland</b>				
IB	Relayed link via Clearstream Banking SA, Luxembourg to EUROCLEAR BANK	Clearstream Banking SA	n/a	EUROCLEAR BANK
<b>Italy</b>				
CSD-I	Direct CASCADE link to Monte Titoli (MT, Milano, Italy)	n/a	n/a	Monte Titoli S.p.A.

<sup>1</sup> The CSDR-licensed CSD cannot make any statement about the legal form of the accounts (client accounts), as such a statement would only be valid at the time of the statement. EFI confirms that it acts in accordance with its rules (<https://www.euroclear.com/finland/en/who-we-are/rules-ceo-decisions.html>) and Finnish law at all times

<b>Latvia</b>				
CSD-LV	Direct CASCADE link to Nasdaq CSD SE (Latvia branch)	n/a	n/a	Nasdaq CSD SE (Latvia branch)
<b>Lithuania</b>				
CSD-LT	Direct CASCADE link to Nasdaq CSD SE (Lithuania branch)	n/a	n/a	Nasdaq CSD SE (Lithuania branch)
<b>Luxembourg</b>				
ICSD-LU	Direct CASCADE link to Clearstream Banking SA, Luxembourg for selected Eurobonds	n/a	n/a	Clearstream Banking SA
CSD-LU	Direct CASCADE link to LuxCSD	n/a	n/a	LuxCSD
<b>Malta</b>				
CSD-MT	Direct CASCADE link to Malta Stock Exchange plc (MSE, Valetta)	n/a	n/a	Malta Stock Exchange plc (MSE)
<b>Netherlands</b>				
CSD-NL	Direct CASCADE link to Euroclear Nederland (ENL, Amsterdam)	n/a	n/a	Euroclear Nederland SA/NV
<b>Portugal</b>				
CSD-PT	Direct CASCADE link to Interbolsa - Sociedade Gestora de Sistemas de Liquidação e de Sistemas Centralizados de Valores Mobiliários, S.A.	n/a	n/a	Interbolsa - Sociedade Gestora de Sistemas de Liquidação e de Sistemas Centralizados de Valores Mobiliários, S.A.

<b>Slovakia</b> CSD-SK	Direct CBF link to Centrálny depozitár cenných papierov SR, a.s., via Československa obchodna banka as	n/a	n/a	Centrálny depozitár cenných papierov SR, a.s
<b>Slovenia</b> CSD-SI	Direct CBF link to KDD - Centralna klirinško depotna družba, d.o.o.	n/a	n/a	Centralna klirinško depotna družba d.settlement system (KDD)
<b>Spain</b> CSD-ES	Direct CASCADE link to Iberclear (Madrid) for Treasury bills, government bonds and securities traded in the AIAF market	n/a	n/a	IBERCLEAR
<b>Switzerland</b> CSD-CH	Direct CASCADE link to SIS (Olten, Switzerland)	n/a	n/a	SIX SIS Ltd.
<b>USA</b> CSD-US	Direct CASCADE link to DTC (New York)	n/a	n/a	The Depository Trust Company (DTC) <sup>2</sup>

<sup>2</sup> TPD received but undisclosed

## Excerpt from the GTC of OeKB CSD (former: 3-Point-Declaration)

### 1. Third Party Presumption

Section 3.9 Para. 1 of the GTC of OeKB CSD determines:

#### *3.9 Third Party Presumption, Right of Retention, Response to Disclosure Requests*

- (1) With the exception of credit balances on securities accounts designated by the securities account holder as participant's own account in pursuant to section 3.2.2 (1), OeKB CSD will deem the securities booked on securities accounts to be owned by a third party and the securities account holder does not have any rights to said securities.

### 2. Lien and Right of Retention

Section 3.9 Para 2 of the GTC of OeKB CSD determines:

#### *3.9 Third Party Presumption, Right of Retention, Response to Disclosure Requests*

- (2) OeKB CSD will not exercise its statutory right of retention, lien or compensation against securities and cash account holders. This does not apply to credit balances on securities accounts which have been designated as participant's own account by the securities account holder pursuant to section 3.2.2 (1).

### 3. Safecustody of the Securities deposited

#### *OeKB CSD as Issuer CSD*

Section 1.3.1 Para 1-2 of the GTC of OeKB CSD determines:

#### *1.3.1 OeKB CSD as Issuer CSD*

- (1) As Issuer CSD, OeKB CSD keeps and administers securities itself, in accordance with paragraph 2, and not with custodian.
- (2) Securities in this meaning are all securities which are, according to Austrian law, capable of being held collectively and are thus transferable by booking instructions, and can be traded on money and/or capital markets (excluding payment instruments), in particular
  - (a) shares and other comparable securities and share certificates;
  - (b) bonds or other forms of securitised debt, including certificates;
  - (c) investment fund shares and comparable securitisations;
  - (d) all other securities which authorise the acquisition or sale of particular securities or which lead to a payment which is determined by tradeable securities, currencies, interest rates or interest income, goods or other indices or measured parameters.

Section 2.2 Para 1 of the GTC of OeKB CSD determines:

*2.2 Validation of Securities at the Acceptance of a Security in Custody and Administration by OeKB CSD as Issuer CSD*

Conditions for the acceptance of a security in custody and administration by OeKB CSD as Issuer CSD within the meaning of section 1.3.1 and for their recording in the IT Booking System of OeKB CSD are the authenticity of the securities document ascertained at the validation of securities (Notary Service) and its correct reflection in the master data in the IT Booking System of OeKB CSD.

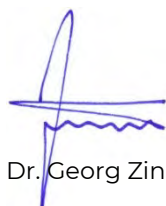
*OeKB CSD as Investor CSD*

Section 1.3.2 of the GTC of OeKB CSD determines:

*1.3.2 OeKB CSD as Investor CSD*

- (1) As Investor CSD, OeKB CSD has securities kept and administered with a custodian. Securities can be deposited on the securities account of OeKB CSD held with a custodian in favour of an account which is administered by OeKB CSD.
- (2) OeKB CSD shall exclusively commission as custodian companies which are entitled to keep and administer securities and are supervised by a regulating body. The custodians of OeKB CSD are listed in Annex 2 (List of Custodians).
- (3) The custodians keep securities itself or in third-party custody.
- (4) As Investor CSD, OeKB CSD decides which securities it admits to be kept and administered with a custodian. OeKB CSD reserves the right to revoke such admittance of securities for safekeeping and administration. Securities account holders are obliged to commission OeKB CSD to withdraw the securities from its vault within 90 T2S Opening Days (days of operation) after the revocation has been published. Otherwise, OeKB CSD is entitled and authorised by the securities account holder to open a securities account including a cash account at a suitable institution at the usual terms and conditions in his name and for his account and to transfer the securities thereto.

OeKB CSD GmbH



Dr. Georg Zinner



Mag. Peter Felsinger

Vienna, December 2021

accordingly and that the depository banks shall be obliged to commit third parties entrusted with the effective safe custody accordingly as well.

For the securities deposited by NBB-SSS with a foreign Central Securities Depository, we ensure that a similar asset protection regime applies to the sub-deposited assets.

Yours sincerely,

A handwritten signature in blue ink, featuring a large, stylized 'G' that loops around and ends with a horizontal line.

**Koen Geenen**  
Head of division

A handwritten signature in blue ink, featuring a stylized 'S' and 'J' that are intertwined, with a horizontal line extending to the right.

**Jimmy Steenhout**  
Head of division





EUROCLEAR BELGIUM  
AVENUE DE SCHIPHOL/SCHIPHOLLAAN 6  
1140 BRUXELLES/BRUSSEL  
BELGIQUE/BELGIË  
TEL. +32 (0)2 337 5411  
FAX +32 (0)2 337 5400  
www.euroclear.be

**CLEARSTREAM BANKING AG**  
To the attention of Mr Ludo HARIGA  
Network Management  
42, avenue JF Kennedy  
L- 1855 LUXEMBOURG

**Our reference**  
SBER/ajan/Dirigen.020

**date**  
12/07/2011

**enclosure(s)**  
/

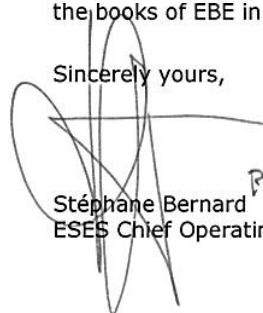
Dear Mr Hariga,

As per your request, please note that:

- 1) Euroclear Belgium ("EBE") does not hold title to the securities recorded in the accounts opened in its books in the name of the credit institutions you represent and that are clients of EBE. EBE enables its clients, upon their request, to segregate the assets they hold on behalf of their own customers from their proprietary assets in sub-accounts.
- 2) With respect to the securities credited in such sub-accounts, EBE may assert any security interest lien, right of retention or any similar rights only for such claims as may arise from the purchase, administration and safe custody of these securities. Besides, attachment by garnishment of the accounts opened with EBE is prohibited.
- 3) EBE maintains vaults and has direct custody over the bearer form securities deposited with it by its clients. EBE is also designated as settlement institution - head of pyramid in the meaning of the Belgian Dematerialisation Act for the Belgian dematerialised securities. All clients' assets are held in the same safekeeping conditions within the vaults or through the link EBE maintains with Euroclear Bank SA/NV, which has a similar asset protection regime as EBE.

Should there be any discrepancy between this letter and the ESES contractual documentation, this confirmation shall constitute the legally valid and binding agreement between EBE and the credit institutions having an account opened in the books of EBE in connection with the ESES Belgium system.

Sincerely yours,

  
P.O.  
Stéphane Bernard  
ESES Chief Operating Officer

  
Valerie Urbain  
ESES Chief Executive Officer



**ESES Institution codes in Euroclear Belgium related to CLEARSTREAM BANKING AG**

ESES institution codes	ESES institution names
1604	CLEARSTREAM (CBF) BE MARKET



CENTRAL  
DEPOSITORY  
& CLEARING  
COMPANY INC.

Broj: U-62/24-5  
Zagreb, June 10, 2024

For the attention of:

**Clearstream Banking S.A.  
Network Management  
42, avenue JF Kennedy  
L-1855 Luxembourg**

**Subject matter: Three-Points-Declaration („Drei-Punkte-Erklärung“), Croatia**

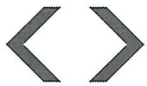
Dear Sirs,

With reference to the circular 06/2010 supplemented by circulars 08/2015 and 05/2020 issued by the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), we herewith represent that:

1. We have taken due note that the securities, which we at present hold or which we shall in future hold in the securities safekeeping accounts kept for Clearstream Banking S.A., belong to the customers of Clearstream Banking S.A.. These accounts shall be designated "customers' account(s)".
2. With respect to the securities credited in these accounts, we may assert any security interest, lien, right of retention or any similar rights over these securities only for claims which arise from the purchase, administration and safe custody of these securities. If not prohibited, we shall inform Clearstream Banking S.A. immediately if a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.

However, none of the aforementioned will prejudice or otherwise affect our ability to comply with and observe the applicable laws and regulations, binding decisions of the competent regulatory agency and the courts of competent jurisdiction.

Securities held in Central Depository & Clearing Company Inc. (hereinafter: CDCC Inc.) in dematerialized form are solely represented by book-entry records in the accounts of our participants. Securities immobilized with CDCC Inc. are kept in safe custody either in our own vaults or by our depository banks in their own vaults in their home country in safekeeping accounts designated in our name. Under the respective depository agreements, such depository banks are not entitled, without specific approval, to entrust



a third party in and outside their home country with the safe custody of such securities or to transfer them to another country.

Furthermore, we shall ensure by adequate agreement with our depository banks that this Three-Point-Declaration shall be applicable for our depository banks accordingly and that the depository banks shall be obliged to commit third parties entrusted with the effective safe custody accordingly as well.

For the securities deposited by CDCC Inc. with a foreign Central Securities Depository, we ensure that a similar asset protection regime applies to the sub-deposited assets.

Yours sincerely,

Central Depository & Clearing Company Inc.

mr. sc. Dora Matošić  
President of the Management Board

AGREP – Heinzelova 62a  
depozitarno društvo d.d.  
AGREP – Heinzelova 62a





**ΧΡΗΜΑΤΙΣΤΗΡΙΟ ΑΞΙΩΝ ΚΥΠΡΟΥ**  
**CYPRUS STOCK EXCHANGE**

Εποπτεύεται από την Επιτροπή Κεφαλαιαγοράς Κύπρου  
Regulated by the Cyprus Securities and Exchange Commission

**Confidential**

For the attention of:

Clearstream Banking S.A.  
Network Management  
42, avenue JF Kennedy  
L-1855 Luxembourg

05 August 2024

**Three-Points-Declaration („Drei-Punkte-Erklärung“), Cyprus**

Dear Sirs,

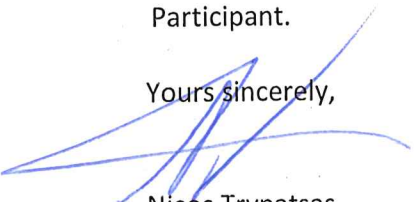
With reference to the circular 06/2010 supplemented by circulars 08/2015 and 05/2020 issued by the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), we herewith represent that:

1. We have taken due note that the securities, which we at present credit or which we shall in future credit in the securities safekeeping accounts kept for Clearstream Banking S.A., as Participant of the Cyprus Stock Exchange (the "Participant") belong to the clients of Clearstream Banking S.A.. These accounts shall be designated "clients' account(s)".

2. With respect to the securities credited to the Participant's "clients' account(s)", we may not assert any right, security interest, lien or claim of any kind. We shall inform the Participant immediately if a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.

3. All securities issued in Cyprus Stock Exchange are in dematerialized form and solely represented by book-entry records in the "clients' account(s)" of our participants. We will neither delegate the custody function nor transfer the securities in the Participant's "clients' account(s)" outside of Cyprus, without the consent of the Participant.

Yours sincerely,

  
Nicos Trypatsas  
Acting General Manager

**Confidential**

Clearstream Banking AG  
Network Management  
42, Avenue JF Kennedy  
L-1855 Luxembourg

Copenhagen, May 2011

**Three-Point-Declaration ("Drei-Punkte-Erklärung")**

Dear Sirs,

With reference to the circular 06-2010 issued by the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), we herewith represent that:

1. We, VP SECURITIES A/S (VP) are the Danish Central Securities Depository acting in accordance with Danish law. We have taken due note that the securities, which are at present credited or which shall in future be credited in the securities safekeeping accounts kept with VP for Clearstream Banking AG (CBF) belong to the customers of CBF. Each of these accounts shall be designated "customers' account".

2. With respect to the securities credited in these accounts, we do not assert any security interest, lien, right of retention or any similar rights over these securities, hereunder claims which may arise from administration and safe custody of these securities. We shall inform CBF immediately if a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.

3. Securities issued with VP in dematerialized form are solely represented by book-entry records in securities safekeeping accounts, including above mentioned accounts designated "customers' account". Securities immobilized indirectly with VP and represented by global or definitive certificates are kept in safe custody either in the vaults of the transferring participant or by the depository banks of the transferring participant in safekeeping accounts designated in our name. For securities transferred directly to VP from a foreign Central Securities Depository or depository bank the securities are kept in safekeeping accounts designated in our name.

Best regards

**VP SECURITIES A/S**

  
Birger Schmidt  
Chief Commercial Officer



**VP SECURITIES A/S**  
WEIDEKAMPSGADE 14  
P.O. BOX 4040  
DK-2300 COPENHAGEN S  
P: +45 4358 8888  
F: +45 4371 2003  
E: VP@VP.DK  
W: VP.DK  
VAT DK: 21599336



**Confidential**

For the attention of:  
Clearstream Banking AG  
Network Management  
42, avenue JF Kennedy  
L-1855 Luxembourg

6 November 2020

**Three-Points-Declaration („Drei-Punkte-Erklärung“)**

Dear Sirs,

With reference to the Circular 8/2015 issued by the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), we herewith represent that:

1. We have taken due note that the securities, which we at present credit or which we shall in future credit in the securities safekeeping accounts kept for Clearstream Banking AG, belong to the customers of Clearstream Banking AG. These accounts shall be designated "customers' account(s)".
2. With respect to the securities credited in these accounts, we may assert any security interest, lien, right of retention or any similar rights over these securities only for claims which arise from the purchase, administration and safe custody of these securities. We shall inform Clearstream Banking AG immediately if a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.
3. Securities issued in Nasdaq CSD SE in dematerialized form are solely represented by book-entry records in the accounts of our participants. Securities immobilized with Nasdaq CSD SE and represented by global or definitive certificates are kept in safe custody either in our own vaults or by our depository banks in their own vaults in their home country in safekeeping accounts designated in our name. Under the respective depository agreements, such depository banks are not entitled, without specific approval, to entrust a third party in and outside their home country with the safe custody of such securities or to transfer them to another country.

Furthermore, we shall ensure by adequate agreement with our depository banks that this Three-Point-Declaration shall be applicable for our depository banks accordingly and that the depository banks shall be obliged to commit third parties entrusted with the effective safe custody accordingly as well.

For the securities deposited by Nasdaq CSD SE with a foreign Central Securities Depository, we ensure that a similar asset protection regime applies to the sub-deposited assets.

Yours sincerely,  
Raitis Vancāns

Head of Sales and Services, Baltics, p.p.



**Confidential**

For the attention of:

Clearstream Banking AG  
Network Management  
42, avenue JF Kennedy  
L-1855 Luxembourg

01.10.2017

Three-Points-Declaration („Drei-Punkte-Erklärung“)

Dear Sirs,

With reference to the Circular 8/2015 issued by the Bundesanstalt für  
Finanzdienstleistungsaufsicht (BaFin), we herewith represent that:

1. We have taken due note that the securities, which we at present credit or which we shall in future credit in the securities safekeeping accounts kept for Clearstream Banking AG, belong to the customers of Clearstream Banking AG. These accounts shall be designated "customers' account(s)".
2. With respect to the securities credited in these accounts, we may assert any security interest, lien, right of retention or any similar rights over these securities only for claims which arise from the purchase, administration and safe custody of these securities. We shall inform Clearstream Banking AG immediately if in spite of the protection afforded by Luxembourg Law, a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.

The securities are kept in safe custody for us by our depository banks in their own vaults or in book entry form in their home country in safekeeping accounts designated in the name of Clearstream Banking, société anonyme, incorporated in Luxembourg.

Under the respective depository agreements, such depository banks are not entitled, without specific approval, to entrust a third party in and




outside their home country with the safe custody of such securities or to transfer them to another country.

The code list that we publish and send out to our account holders indicates which securities are held by which depositary bank. Any changes in a depositary bank will be reflected in the code list without delay.

Furthermore we shall ensure by adequate agreement with our depositary banks that the Three-Point-Declaration shall be applicable for our depositary banks accordingly and that the depositary banks shall be obliged to commit third parties entrusted with the effective safe custody accordingly as well.

In case of conflict with articles 13 ,43 and 44 of Clearstream Banking S.A.'s General Terms and conditions, the above three representations, which are specifically made to Clearstream Banking AG's safekeeping accounts with Clearstream Banking S.A., shall prevail.

Yours Sincerely,



**Mark Gem**  
Chief Compliance Officer



**Philippe Seyll**  
Co-CEO Clearstream Banking S.A.  
Phone: +352 243 3 2510



*Post-trade made easy*

Clearstream Banking S.A.  
42, avenue J.F. Kennedy  
L-1855 Luxembourg  
(Can be forwarded to your clients)

Helsinki, 10 December 2021

To Clearstream Banking S.A

### Three-Points-Declaration

We, Euroclear Finland Ltd, herewith represent that:

- 1) Euroclear Finland Ltd acts as the sole central securities depository in Finland, under the license granted by the Ministry of Finance in accordance with the Finnish law (Act on the Book-Entry System and Settlement Operations 348/2017 as amended). All book-entry accounts opened in the name of Clearstream **Banking S.A. (the "Accounts")** are operated by account operators, licensed by us, on behalf of and in the name of the account holder(s) in question.
- 2) We as a central securities depository do not assert any security interest, lien, right of retention or any similar rights over book-entries held on the Accounts.
- 3) All securities issued with us are in dematerialised form and solely represented by book-entry records in individual accounts. Securities that are transferred to us from a foreign central securities depository are held in a segregated securities account in our name with the foreign depository.

KL

Euroclear Finland Oy is incorporated in Finland (Company n° 654 686) (business identity code 1061446-0), with registered mailing address at PO Box 1110, 00101 Helsinki, Finland

Euroclear Finland Oy  
Urho Kekkosen katu 5C  
00100 Helsinki, Finland  
Tel. +358 (0)20 770 6000  
[www.euroclear.com](http://www.euroclear.com)

Yours sincerely,

Kati Honkajuuri-Kokkonen, Chief Administration Officer  
Euroclear Finland

Heidi Malkki, Chief Compliance Officer  
Euroclear Finland

KL

KL

Electronically signed / Sähköisesti allekirjoitettu / Elektroniskt signerats / Elektronisk signert / Elektronisk underskrevet  
<https://sign.visma.net/fi/document-check/96bd3fa8-85a0-4583-971d-69b0c7c6c58e>

VISMA Sign  
[www.vismasign.com](http://www.vismasign.com)

## SIGNATURES

## ALLEKIRJOITUKSET

## UNDERSKRIFTER

## SIGNATURER

## UNDERSKRIFTER

This documents contains 2 pages before this page  
Dokumentet inneholder 2 sider før denne siden

Tämä asiakirja sisältää 2 sivua ennen tätä sivua  
Dette dokument indeholder 2 sider før denne side

Detta dokument innehåller 2 sidor före denna sida

KATI TUULIA HONKAJUURI-KOKKONEN

Euroclear Finland Oy , FI10614460, Urho Kekkosen katu 5 C, 00100, Helsinki

14c5632a-c459-40da-84a5-99acb57591af - 2021-12-10 16:43:02 UTC +02:00

BankID / MobileID - c7afcea6-93dc-42a3-868a-df6e88b9d7fa - FI

Representative - Nimenkirjoitusoikeus - Firmateckningsrätt - Représentant - Repræsentant

HEIDI MALKKI

Euroclear Finland Oy , FI10614460, Urho Kekkosen katu 5 C, 00100, Helsinki

87a502af-d117-4938-9059-b4a71d6854cb - 2021-12-13 17:18:04 UTC +02:00

BankID / MobileID - fcb1f9d3-8a11-4f12-a2e9-c30ce85428d1 - FI

Representative - Nimenkirjoitusoikeus - Firmateckningsrätt - Représentant - Repræsentant



EUROCLEAR FRANCE  
115 RUE RÉAUMUR  
75081 PARIS CEDEX 02  
FRANCE

**CLEARSTREAM BANKING AG**

To the attention of Mr. Ludo HARIGA  
Network Management  
42, Avenue JF Kennedy  
L-1855 LUXEMBOURG

Paris, 3 June 2011

Dear Mr Ludo HARIGA,

As per your request, please note that:

- 1) Euroclear France ("EF") does not hold title to the securities recorded in the accounts opened in its books in the name of the credit institutions you represent and that are clients of EF. Under French law, ownership rights are not materialised at the level of the central securities depository but at the level of its clients, i.e. the custodians (*Teneurs de Compte Conservateur*). Upon their request, EF enables the custodians to segregate their proprietary assets from the ones of their own customers in sub-accounts.
- 2) Since no ownership right is materialised at the level of the accounts maintained by EF, no interest lien, right of retention or similar rights is possible. Besides, attachment of the accounts maintained by EF is prohibited.
- 3) Securities issued in France are dematerialised and are solely represented by book-entry records in the accounts maintained in EF. EF maintains vaults for foreign securities, e.g. for some African securities. Such physical securities are recorded into accounts maintained by EF and the transfers of ownership rights on the securities are effected by book-entry records.

For the securities deposited with a foreign CSD with which EF has a link, EF ensures that a similar asset protection regime applies to the sub-deposited assets.

Should there be any discrepancy between this letter and the ESES contractual documentation, this confirmation shall constitute the legally valid and binding agreement between EF and the credit institutions having an account opened in the books of EF in connection with the ESES France system.

Sincerely yours,

Frédéric Germain  
Head of Asset Services ESES Euroclear



EUROCLEAR FRANCE  
115 RUE RÉAUMUR  
75081 PARIS CEDEX 02  
FRANCE

ESES Institution codes in Euroclear France related to CLEARSTREAM BANKING AG

ESES institution codes	ESES institution names
607	CLEARSTREAM (CBF) FR MARKET

Clearstream Banking AG  
Network Management  
42 Avenue JF Kennedy  
L-1855 Luxembourg

LuxCSD

42 Avenue JF Kennedy  
L-1855 Luxembourg

Phone  
+352-243-35446

Fax  
+352-243-635446

E-mail  
corporate.office@  
luxcsd.com

12 December 2016

**Three Point Declaration („Drei-Punkte-Erklärung“)**

Dear Sir/Madam,

With reference to the Circular 8/2015 issued by the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), we herewith represent that:

1. We have taken due note that the securities, which we at present credit or which we shall in future credit in the securities safekeeping accounts kept for Clearstream Banking AG, belong to the customers of Clearstream Banking AG. These accounts shall be designated "customers' account(s)".
2. With respect to the securities credited in these accounts, we may assert any security interest, lien, right of retention or any similar rights over these securities only for claims which arise from the purchase, administration and safe custody of these securities. We shall inform Clearstream Banking AG immediately if a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.
3. Securities issued in LuxCSD S.A. in dematerialized form are solely represented by book-entry records in the accounts of our participants. Securities immobilized with LuxCSD S.A. and represented by global or definitive certificates are kept in safe custody either in our own vaults or by our depository banks in their own vaults in their home country in safekeeping accounts designated in our name. Under the respective depository agreements, such depository banks are not entitled, without specific approval, to entrust a third party in and outside their home country with the safe custody of such securities or to transfer them to another country.

Furthermore, we shall ensure by adequate agreement with our depository banks that this Three-Point-Declaration shall be

LuxCSD société anonyme is  
organised with limited liability in  
the Grand Duchy of Luxembourg  
RCS Luxembourg B 154.449

Registered address  
42 Avenue JF Kennedy  
L-1855 Luxembourg

applicable for our depository banks accordingly and that the depository banks shall be obliged to commit third parties entrusted with the effective safe custody accordingly as well.

For the securities deposited by LuxCSD S.A. with a foreign Central Securities Depository, we ensure that a similar asset protection regime applies to the sub-deposited assets.

Yours faithfully,



Patrick Georg  
Chief Executive Officer



Carolyn Linnevers  
Company Secretary





*Post-trade made easy*

Euroclear France  
66 rue de la Victoire  
75009 PARIS  
Tel. +33 (0)1 55 34 55 34  
www.euroclear.com

LUXCSD S.A.

To Mrs FEDOROV Inez  
Network Management Office  
42, avenue J.F. Kennedy  
L - 1855 LUXEMBOURG

Paris, 07/02/2019

Dear Mrs Inez Fedorov,

As per your request, please note that:

- 1) Euroclear France ("EF") does not hold title to the securities recorded in the accounts opened in its books in the name of the credit institutions you represent and that are clients of EF. Under French law, ownership rights are not materialised at the level of the central securities depository but at the level of its clients, i.e. the custodians (*Teneurs de Compte Conservateur*). Upon their request, EF enables the custodians to segregate their proprietary assets from the ones of their own customers in sub-accounts.
- 2) Since no ownership right is materialised at the level of the accounts maintained by EF, no interest lien, right of retention or similar rights is possible. Besides, attachment of the accounts maintained by EF is prohibited.
- 3) Securities issued in France are dematerialised and are solely represented by book-entry records in the accounts maintained in EF. EF maintains vaults for foreign securities, e.g. for some African securities. Such physical securities are recorded into accounts maintained by EF and the transfers of ownership rights on the securities are effected by book-entry records.

For the securities deposited with a foreign CSD with which EF has a link, EF ensures that a similar asset protection regime applies to the sub-deposited assets.

Should there be any discrepancy between this letter and the ESES contractual documentation, this confirmation shall constitute the legally valid and binding agreement between EF and the credit institutions having an account opened in the books of EF in connection with the ESES France system.

Sincerely yours,

**Frédéric GERMAIN**

**Chief Operating Officer**  
Euroclear Belgium, Euroclear France and Euroclear  
Nederland

ESES Institution codes in Euroclear France related to **LUXCSD S.A.**

<b>ESES institution code(s)</b>	<b>ESES institution name(s)</b>
<b>653</b>	<b>LUXCSD FR/CBF/LP1</b>



## BANK OF GREECE

### EUROSYSTEM

PAYMENT AND SETTLEMENT SYSTEMS DEPARTMENT

Athens, 22 January 2021

Ref. No: 7

**Confidential**

For the attention of:

**Clearstream Banking AG**

Network Management

42, avenue JF Kennedy

L-1855 Luxembourg

### Three-Points-Declaration („Drei-Punkte-Erklärung“)

Dear Sirs,

Concerning the securities account No 10089305111253 held at the Bank of Greece (“**BoG**”) as CSD and operator of the System for Monitoring Transactions in Securities in electronic Book-Entry (“**BoGS**”), please note the following:

1. According to Law 2198/1994 dematerialised government securities are registered, in book-entry form, within the BoGS. The System’s participants, act as operators of accounts held therein (the “**Participants**”) according to articles 5 - 12 of Law 2198/1994 and the Operating Regulations of the System for Monitoring Transactions in Securities in book-entry form (“**Operating Rules**”). Each Participant holds two different accounts in the System, an «own portfolio account» and an «investor/customer portfolio account» which is a single account pooling together all the securities of the Participant’s customers (omnibus account).

Securities account no 10089305111253 (EU (other than Greek) Customers’ portfolio account) is an investor/customer portfolio account where dematerialised government securities issued in BOGS (Greek Government Bonds) are held. Therefore, the securities, which we at present credit or which we shall in future credit in the above securities account of Clearstream Banking AG, are registered on behalf of the customers of Clearstream Banking AG, pursuant to Article 6 paragraph 7 of law 2198/1994. Participants are obliged to keep separate records per customer (Art. 6 para. 5 of law 2198/1994) and to take at any time appropriate measures to ensure that securities registered in the customers’ account correspond to the securities belonging to their customers (Art. 9.3.2 of the Operating Rules).

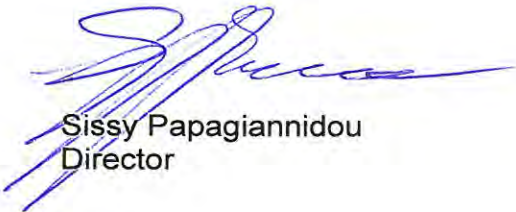


2. With respect to the securities credited in these accounts, we may assert any security interest, lien, right of retention or any similar rights over these securities only for claims which arise from the purchase, administration and safe custody of these securities, in accordance with the Operating Rules of BOGS. We shall inform Clearstream Banking AG immediately if a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other legal measures equivalent to seizure or attachment, which affect the securities. Please note, however, that, pursuant to Article 7 paragraph 2 of law 2198/1994 on the establishment of BoGS, accounts held with the latter are not subject to compulsory or conservatory seizure.
3. Securities issued in BoGS in dematerialized form are solely represented by book-entry records in the accounts of our participants. By virtue of Law 2198/1994, BoG is acting as a) CSD/Central Registry establishing the contractual relation between the bonds issuer and the participants of BoGS and, through the latter, the investors, as well as b) the BoGS Operator, according to the law and BoGS Operating Rules.

Without prejudice to T2S related functions, BoG is not entitled to outsource or assign any of its core functions as Registrar/CSD and BoGS Operator to a third party residing in or outside Greece.

It should be noted that, without prejudice to the role of BOGS as a CSD in providing and maintaining the securities accounts at the top tier level, safe custody of the securities registered with BoGS and registered in / held with BoGS participants' accounts is entrusted to the BoGS participants.

Yours sincerely,



Sissy Papagiannidou  
Director



EUROCLEAR BANK SA/NV  
1 BOULEVARD DU ROI ALBERT II  
1210 BRUSSELS, BELGIUM  
BPM BRUSSELS 0429 875 591  
TEL.: +32 (0)2 326 1211  
www.euroclear.com

**Confidential**

Clearstream Banking S.A.  
Attention of Mrs Inez Fedorovo  
Network Management  
Avenue JF Kennedy 42  
L-1855 Luxembourg  
Grand Duchy of Luxembourg

4 April 2011

**Three-Points-Declaration („Drei-Punkte-Erklärung“)**

Dear Madam,

With reference to the circular 06-2010 issued by the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), we herewith represent that:

1. We have taken due note that the securities, which we at present credit or which we shall in future credit in the securities safekeeping accounts kept for Clearstream Banking S.A., belong to the customers of Clearstream Banking S.A.. These accounts shall be designated "customers' account(s)".
2. With respect to the securities credited in these accounts, we may assert any security interest, lien, right of retention or any similar rights over these securities only for claims which arise from the purchase, administration and safe custody of these securities. We shall inform Clearstream Banking S.A. immediately if a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.
3. Securities that are dematerialized or immobilized with a Central Securities Depository (CSD) are represented by book-entry records on our account with the said CSD. Securities issued in definitive form are kept in safe custody either in our own vaults or by our depositary banks in their own vaults in their home country in safekeeping accounts designated in the name of Euroclear Bank SA/NV. Under the respective depositary agreements, such depositary banks are



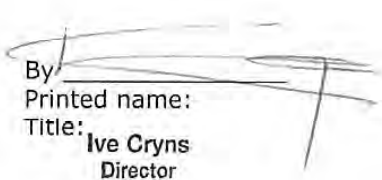
page 2 of 2

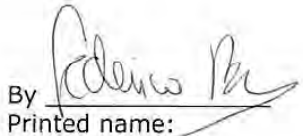
EUROCLEAR BANK SA/NV  
1 BOULEVARD DU ROI ALBERT II  
1210 BRUSSELS, BELGIUM  
RPM BRUSSELS 0429 875 591  
TEL: +32 (0)2 326 1211  
[www.euroclear.com](http://www.euroclear.com)

not entitled, without specific approval, to entrust a third party in and outside their home country with the safe custody of such securities or to transfer them to another country.

Furthermore, we shall ensure by adequate agreement with our depository banks that this Three-Point-Declaration shall be applicable for our depository banks accordingly and that the depository banks shall be obliged to commit third parties entrusted with the effective safe custody accordingly as well.

Yours sincerely,

By   
Printed name:  
Title: **Ivo Cryns**  
Director

By   
Printed name:  
Title: **Federico Becerra**  
Director

-03675-28.06.2011-MT

**CLEARSTREAM BANKING AG**  
Neue Boersenstrasse 1  
60487 FRANKFURT A.M.

**Confidential**

For the attention of: Mr. Ernesto SAU

June, 27<sup>th</sup> 2011

**Three-Points-Declaration („Drei-Punkte-Erklärung“)**

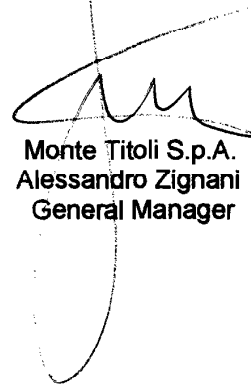
Dear Sirs,

With reference to the circular 06-2010 issued by the Bundesanstalt für  
Finanzdienstleistungsaufsicht (BaFin), we herewith represent that:

1. We have taken due note that the securities, which we at present credit or which we shall in future credit in the securities safekeeping accounts kept for Clearstream Banking AG, belong to the customers of Clearstream Banking AG. These accounts shall be designated "customers' account(s)".
2. With respect to the securities credited in these accounts, we may assert any security interest, lien, right of retention or any similar rights over these securities only for claims which arise from the purchase, administration and safe custody of these securities. We shall inform Clearstream Banking AG immediately if a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.
3. Securities centralized in Monte Titoli in dematerialized form are solely represented by book-entry records in the accounts of our participants. Securities immobilized with Monte Titoli and represented by global or definitive certificates are kept in safe custody in our own vaults.

For the securities deposited by Monte Titoli with a foreign Central Securities Depository, we ensure that a similar asset protection regime applies to the sub-deposited assets.

Yours sincerely,



Monte Titoli S.p.A.  
Alessandro Zignani  
General Manager







**Confidential**

For the attention of:  
Clearstream Banking AG  
Network Management  
42, avenue JF Kennedy  
L-1855 Luxembourg

6 November 2020

**Three-Points-Declaration („Drei-Punkte-Erklärung“)**

Dear Sirs,

With reference to the Circular 8/2015 issued by the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), we herewith represent that:

1. We have taken due note that the securities, which we at present credit or which we shall in future credit in the securities safekeeping accounts kept for Clearstream Banking AG, belong to the customers of Clearstream Banking AG. These accounts shall be designated "customers' account(s)".
2. With respect to the securities credited in these accounts, we may assert any security interest, lien, right of retention or any similar rights over these securities only for claims which arise from the purchase, administration and safe custody of these securities. We shall inform Clearstream Banking AG immediately if a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.
3. Securities issued in Nasdaq CSD SE in dematerialized form are solely represented by book-entry records in the accounts of our participants. Securities immobilized with Nasdaq CSD SE and represented by global or definitive certificates are kept in safe custody either in our own vaults or by our depository banks in their own vaults in their home country in safekeeping accounts designated in our name. Under the respective depository agreements, such depository banks are not entitled, without specific approval, to entrust a third party in and outside their home country with the safe custody of such securities or to transfer them to another country.

Furthermore, we shall ensure by adequate agreement with our depository banks that this Three-Point-Declaration shall be applicable for our depository banks accordingly and that the depository banks shall be obliged to commit third parties entrusted with the effective safe custody accordingly as well.

For the securities deposited by Nasdaq CSD SE with a foreign Central Securities Depository, we ensure that a similar asset protection regime applies to the sub-deposited assets.

Yours sincerely,  
Raitis Vancāns

Head of Sales and Services, Baltics, p.p.

**Confidential**

For the attention of:

Clearstream Banking AG  
Network Management  
42, avenue JF Kennedy  
L-1855 Luxembourg

01.10.2017

Three-Points-Declaration („Drei-Punkte-Erklärung“)

Dear Sirs,

With reference to the Circular 8/2015 issued by the Bundesanstalt für  
Finanzdienstleistungsaufsicht (BaFin), we herewith represent that:

1. We have taken due note that the securities, which we at present credit or which we shall in future credit in the securities safekeeping accounts kept for Clearstream Banking AG, belong to the customers of Clearstream Banking AG. These accounts shall be designated "customers' account(s)".
2. With respect to the securities credited in these accounts, we may assert any security interest, lien, right of retention or any similar rights over these securities only for claims which arise from the purchase, administration and safe custody of these securities. We shall inform Clearstream Banking AG immediately if in spite of the protection afforded by Luxembourg Law, a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.

The securities are kept in safe custody for us by our depository banks in their own vaults or in book entry form in their home country in safekeeping accounts designated in the name of Clearstream Banking, société anonyme, incorporated in Luxembourg.

Under the respective depository agreements, such depository banks are not entitled, without specific approval, to entrust a third party in and

outside their home country with the safe custody of such securities or to transfer them to another country.

The code list that we publish and send out to our account holders indicates which securities are held by which depository bank. Any changes in a depository bank will be reflected in the code list without delay.

Furthermore we shall ensure by adequate agreement with our depository banks that the Three-Point-Declaration shall be applicable for our depository banks accordingly and that the depository banks shall be obliged to commit third parties entrusted with the effective safe custody accordingly as well.

In case of conflict with articles 13 ,43 and 44 of Clearstream Banking S.A.'s General Terms and conditions, the above three representations, which are specifically made to Clearstream Banking AG's safekeeping accounts with Clearstream Banking S.A., shall prevail.

Yours Sincerely,



**Mark Gem**  
Chief Compliance Officer



**Philippe Seyll**  
Co-CEO Clearstream Banking S.A.  
Phone: +352 243 3 2510

Clearstream Banking AG  
Network Management  
42 Avenue JF Kennedy  
L-1855 Luxembourg

LuxCSD

42 Avenue JF Kennedy  
L-1855 Luxembourg

Phone  
+352-243-35446

Fax  
+352-243-635446

E-mail  
corporate.office@  
luxcsd.com

12 December 2016

**Three Point Declaration („Drei-Punkte-Erklärung“)**

Dear Sir/Madam,

With reference to the Circular 8/2015 issued by the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), we herewith represent that:

1. We have taken due note that the securities, which we at present credit or which we shall in future credit in the securities safekeeping accounts kept for Clearstream Banking AG, belong to the customers of Clearstream Banking AG. These accounts shall be designated "customers' account(s)".
2. With respect to the securities credited in these accounts, we may assert any security interest, lien, right of retention or any similar rights over these securities only for claims which arise from the purchase, administration and safe custody of these securities. We shall inform Clearstream Banking AG immediately if a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.
3. Securities issued in LuxCSD S.A. in dematerialized form are solely represented by book-entry records in the accounts of our participants. Securities immobilized with LuxCSD S.A. and represented by global or definitive certificates are kept in safe custody either in our own vaults or by our depository banks in their own vaults in their home country in safekeeping accounts designated in our name. Under the respective depository agreements, such depository banks are not entitled, without specific approval, to entrust a third party in and outside their home country with the safe custody of such securities or to transfer them to another country.

Furthermore, we shall ensure by adequate agreement with our depository banks that this Three-Point-Declaration shall be

LuxCSD société anonyme is  
organised with limited liability in  
the Grand Duchy of Luxembourg  
RCS Luxembourg B 154.449

Registered address  
42 Avenue JF Kennedy  
L-1855 Luxembourg



applicable for our depository banks accordingly and that the depository banks shall be obliged to commit third parties entrusted with the effective safe custody accordingly as well.

For the securities deposited by LuxCSD S.A. with a foreign Central Securities Depository, we ensure that a similar asset protection regime applies to the sub-deposited assets.

Yours faithfully,



Patrick Georg  
Chief Executive Officer



Carolyn Linnevers  
Company Secretary



## MALTA STOCK EXCHANGE plc

Garrison Chapel, Castille Place,  
Valletta VLT 1063,  
Malta

Tel: +356 2124 4051  
Fax: +356 2569 6316  
E-mail: [evmuscat@borzamalta.com.mt](mailto:evmuscat@borzamalta.com.mt)  
Website: [www.borzamalta.com.mt](http://www.borzamalta.com.mt)

Company Registration No: C 42525

Chief Executive

Our Ref:- MSE-CBF-3Punkte Erklärung-03042012  
Your Ref:- n/a

3 April 2012

CONFIDENTIAL

Herr Oliver Mayer  
Clearstream Banking AG  
c/o Network Management  
42, avenue JF Kennedy  
L-1855 Luxembourg  
LUXEMBOURG

Dear Herr Mayer,

**Three-Points-Declaration („Drei-Punkte-Erklärung“) re MSE A/c No. 9726055**

As requested in your most recent email of 27 March 2012 on the subject in caption, with reference to the Circular 06-2010 issued by the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), Malta Stock Exchange plc represents hereon that:

1. It has taken due note that the securities, which it presently credits or which it shall in future credit in the securities safekeeping account in caption, hereinafter referred to as "*the said account*", kept for Clearstream Banking AG, belong to the customers of Clearstream Banking AG. This account is designated "*Malta Stock Exchange plc as custodian of Clearstream Banking AG - Customers' Account*".
2. With respect to the securities credited in the said account, Malta Stock Exchange plc assert any security interest, lien, right of retention or any similar rights over these securities only for claims which arise from the purchase, administration and safe custody of such securities. Malta Stock Exchange plc shall inform Clearstream Banking AG immediately if a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.



## MALTA STOCK EXCHANGE plc

3. Securities issued within or admitted to the Malta Stock Exchange plc as an authorised central securities depository in dematerialized form are solely represented by book-entry records in the accounts of our account holders. Securities that may be immobilized with Malta Stock Exchange plc and represented by global or definitive certificates shall be kept in safe custody, either in our own vaults or by our depository banks in their own vaults, in their home country, in safekeeping accounts designated in the name of Malta Stock Exchange plc. Under the eventual respective depository agreements, Malta Stock Exchange plc will ensure that, with respect to the said account, such depository banks will not be entitled, without specific approval, to entrust a third party in or outside their home country with the safe custody of such securities or to transfer them to another country.

Furthermore, Malta Stock Exchange plc shall ensure that, with respect to the said account, by adequate agreement with our depository banks, this Three-Point-Declaration shall be applicable to our depository banks accordingly and that the depository banks shall be obliged to commit third parties entrusted with the effective safe custody accordingly as well.

For the securities deposited by Malta Stock Exchange plc with a foreign central securities depository, it will be ensured that, with respect to the said account, a similar asset protection regime applies to the sub-deposited assets.

Yours sincerely

**Eileen V Muscat**  
Chief Executive

**Robert Vella Baldacchino**  
Deputy General Manager



euroclear

EUROCLEAR NEDERLAND

HERENGRACHT 459-469

1017 BS AMSTERDAM

NEDERLAND

TEL. +31 (0)20 552 1500

FAX +31 (0)20 552 1555

www.euroclear.com

**CLEARSTREAM BANKING AG**

To the attention of Mr Ludo HARIGA

Network management

42, avenue JF Kennedy

L – 1855 LUXEMBOURG

Amsterdam, 3 June 2011

Dear Mr Ludo HARIGA,

As per your request, please note that:

- 1) Euroclear Nederland ("ENL") does not hold title to the securities recorded in the accounts opened in its books in the name of the credit institutions you represent that are clients of ENL. ENL enables its clients, upon their request, to segregate the assets they hold on behalf of their own customers from their proprietary assets in sub-accounts.
- 2) With respect to the securities credited in these accounts, ENL may assert any security interest lien, right of retention or any similar rights only for such claims as may arise from the purchase, administration and safe custody of these securities. Besides, attachment by garnishment of the accounts opened with ENL is prohibited.
- 3) ENL maintains vaults and has direct custody over the bearer form securities deposited with it by its clients. All clients' assets are held in the same safekeeping conditions within the vaults or through the link ENL maintains with Euroclear Bank SA/NV. This link was approved by the Dutch Minister of Finance and Euroclear Bank SA/NV has a similar asset protection regime as ENL.

Should there be any discrepancy between this letter and the ESES contractual documentation, this confirmation shall constitute the legally valid and binding agreement between ENL and the credit institutions having an account opened in the books of ENL in connection with the ESES Nederland system.

Sincerely yours,

Hugo Spanjer

Chief Administrative Officer ENL, EBE & EF





ESES Institution codes in Euroclear Nederland related to CLEARSTREAM BANKING AG

ESES institution codes	ESES institution names
1603	CLEARSTREAM (CBF) NL MARKET



**Confidential**

For the attention of:

Clearstream Banking AG  
Network Management  
42, avenue JF Kennedy  
L-1855 Luxembourg

22 November 2021

**Three-Points-Declaration**

Dear Sirs,

As requested by Clearstream Banking AG (CBF) we herewith state that:

1. We have taken due note that the securities, which we at present credit or which we shall in future credit in the securities safekeeping accounts kept for Clearstream Banking AG, are kept in Interbolsa's systems as belonging to the customers of Clearstream Banking AG. These accounts shall be identified by CBF in Interbolsa's systems as "customers' account(s)".
2. With respect to the securities credited in these accounts, we may assert any security interest, lien, right of retention or any similar rights over these securities only for claims which arise from the purchase, administration and safe custody of these securities. We shall inform Clearstream Banking AG immediately if a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.
3. Securities issued in Interbolsa in dematerialized form are solely represented by book-entry records in the accounts of our participants. Securities in materialised form are immobilized in Interbolsa's vault and treated as book-entry records in accordance with article 3 of Regulation (EU) 909/2014, of 23 July of 2014, and article 105 of the Portuguese Securities Code. Interbolsa is responsible for the management of all the securities issued in its systems.

Yours sincerely,

DocuSigned by:  
 **Corina Oliveira**  
8E3F61139A4F451...


Corina Oliveira  
Operations Director

**Certificate Of Completion**

Envelope Id: 7BAB89231F554D27BDC6D0067D7C8A64	Status: Completed
Subject: Please DocuSign: 22112021_CBF IB_3-pts declaration_signed.docx	
Source Envelope:	
Document Pages: 1	Signatures: 1
Certificate Pages: 3	Initials: 0
AutoNav: Enabled	Envelope Originator:
Envelopeld Stamping: Enabled	Helena Teixeira Lopes
Time Zone: (UTC+01:00) Brussels, Copenhagen, Madrid, Paris	14 PLACE DES REFLETS
	COURBEVOIE, Ile de france 92400
	<a href="mailto:hlopes@euronext.com">hlopes@euronext.com</a>
	IP Address: 89.115.245.145

**Record Tracking**

Status: Original	Holder: Helena Teixeira Lopes	Location: DocuSign
November 24, 2021   12:39	<a href="mailto:hlopes@euronext.com">hlopes@euronext.com</a>	

Signer Events	Signature	Timestamp
Corina Oliveira <a href="mailto:coliveira@euronext.com">coliveira@euronext.com</a> Security Level: Email, Account Authentication (Optional), Digital Certificate <b>Signature Provider Details:</b> Signature Type: DocuSign Protect & Sign (Client ID: DDE5E85D-4085-40B6-8785-DA3CCD16D81E) Signature Issuer: DocuSign Cloud Signing CA - SI1 Authentication: SMS (+351 910 021 986) <b>Electronic Record and Signature Disclosure:</b> Accepted: November 24, 2021   14:28 ID: 24a2cd31-8d84-4913-b6ff-e727989f283c	 Signature Adoption: Pre-selected Style Using IP Address: 188.251.202.166 Signature Provider Location: <a href="https://ps-ws.dsf.docuSign.net/ds-server/s/noauth/psm/tsp/sign">https://ps-ws.dsf.docuSign.net/ds-server/s/noauth/psm/tsp/sign</a>	Sent: November 24, 2021   12:41 Resent: November 24, 2021   14:49 Viewed: November 24, 2021   14:28 Signed: November 24, 2021   15:32

In Person Signer Events	Signature	Timestamp
Editor Delivery Events	Status	Timestamp
Agent Delivery Events	Status	Timestamp
Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp
Witness Events	Signature	Timestamp
Notary Events	Signature	Timestamp
Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	November 24, 2021   12:41
Certified Delivered	Security Checked	November 24, 2021   14:28
Signing Complete	Security Checked	November 24, 2021   15:32
Completed	Security Checked	November 24, 2021   15:32
Payment Events	Status	Timestamps
Electronic Record and Signature Disclosure		

## **ELECTRONIC RECORD AND SIGNATURE DISCLOSURE (“DISCLOSURE”)**

PLEASE READ THE CONDITIONS BELOW CAREFULLY AND THOROUGHLY AND CONFIRM YOUR AGREEMENT BY SELECTING THE CHECK-BOX NEXT TO ‘*I AGREE TO USE ELECTRONIC RECORDS AND SIGNATURES*’ BEFORE CLICKING ‘CONTINUE’ WITHIN THE DOCUSIGN SYSTEM.

1. **CAPACITY TO SIGN AND ACCEPT THE TERMS OF USE** By proceeding with this electronic signature process you affirm that you are the person duly identified in the agreement to be signed (“Agreement”) and legally authorized to sign. If you are not authorized to sign the document, please do not forward this email and contact Euronext, who will then forward a new email to the appropriate person.
2. **COMPLIANCE WITH LAWS AND REGULATION** This signature process is compliant with the REGULATION (EU) No 910/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014 on electronic identification and trust services for electronic transactions in the internal market (UE regulation eIDAS) and the law governing the Agreement.
3. **ADVANCED SIGNATURE** According to the applicable certificate policy of the trust service provider, the signature type used is the solution delivered for an advanced signature as defined in the article 26 UE regulation eIDAS provided it is mentioned Protect and Sign under the field “Signature type” of the document delivered by DocuSign for proof of consent.
4. **ACKNOWLEDGING YOUR CONSENT TO RECEIVE AND SIGN AGREEMENT ELECTRONICALLY** You acknowledge and agree this electronic signature process shall constitute a proof of evidence of your consent to conclude the Agreement and shall be legally binding. You agree that in the event of any conflict between this provision and any provision in the Agreement or any further documentation, this provision shall prevail.
5. **ACKNOWLEDGING THAT THIS DISCLOSURE IS PART OF YOUR AGREEMENT** You acknowledge and agree that this Disclosure forms part of the Agreement and is incorporated therein by reference. You can access this disclosure electronically and are able to print or electronically save this it for future reference.
6. **PERSONAL DATA** Euronext (a part of the Euronext Group) is committed to protecting the personal data and upholding the right to privacy of individuals as provided by Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data (“GDPR”) and any national implementing laws and regulations of the GDPR. The Privacy Statement available at: <https://www.euronext.com/en/privacy-policy> outlines how and why we collect and process personal data and provides an overview of the rights in relation to personal data.

Please inform your staff involved in the workflow of this e-signature about this Privacy Statement.



# Centrálny depozitár cenných papierov SR, a. s.

## Confidential

For the attention of:  
Stuart Kelly  
Clearstream Banking AG  
Network Management  
42, avenue JF Kennedy  
L-1855 Luxembourg

Your ref.:

Our ref.:

Attn./Tel.:

Date:  
29.04.2024

## Re: Three-Point Declaration BaFin Circular 05/2020 (WA)

Dear Sirs,

We herewith represent that:

1. We have taken due note that the securities, which we at present credit or which we shall in future credit in the securities safekeeping account kept for Clearstream Banking AG, belong to the customers of Clearstream Banking AG (the "Account"). The Account shall be designated "Holder's Account", which term under the applicable Slovak law and in our books refers to an account containing customer (i.e. non-proprietary) assets.
2. With respect to the securities credited in the Account, we may not assert any security interest, lien, right of retention or any similar rights whatsoever. We shall inform Clearstream Banking AG immediately if a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.
3. All securities issued in CDCP are in dematerialized form and solely represented by book-entry records, including the securities in the Account.
4. CDCP does not (sub-)deposit the securities held in the Account with any third parties.

Yours sincerely,

Martin Wiedermann  
Chairman of Board of Directors

Centrálny depozitár cenných papierov SR, a.s.  
Ul. 29. augusta 1/A, 814 80 Bratislava  
Obchodný register MS BA III, oddiel Sa, vložka č. 493/B  
- 1 -

Lukáš Bonko  
Member of Board of Directors

Obchodný register Mestského súdu Bratislava III., oddiel Sa, vložka č. 493/B

ul. 29. augusta 1/A, 814 80 Bratislava I  
Telefón: 00421 / 2 / 5939 5110  
Fax: 00421 / 2 / 5296 8755

IČO: 313 389 76  
DIČ: 2020312833  
IČ DPH: SK2020312833

Bankové spojenie: Slovenská sporiteľňa, a.s.  
IBAN: SK26 0900 0000 0051 5999 9701, BIC CODE: GIBASKBX  
[www.cdc.sk](http://www.cdc.sk)

K.





KDD - CENTRAL SECURITIES  
CLEARING CORPORATION  
LJUBLJANA

Tivolska cesta 48, SI - 1542 Ljubljana  
T: + 386 1 307 35 00

E: info@kdd.si  
www.kdd.si

## Confidential

For the attention of:  
Stuart Kelly  
Clearstream Banking AG  
Network Management  
42, avenue JF Kennedy  
L-1855 Luxembourg



18<sup>th</sup> November 2024

### Three-Points-Declaration („Drei-Punkte-Erklärung“)

Dear Sirs,

With reference to the Circular 8/2015 issued by the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin), we herewith represent that:

1. We have taken due note that the securities, which we at present credit or which we shall in future credit in the securities safekeeping accounts kept for Clearstream Banking AG, belong to the customers of Clearstream Banking AG. These accounts shall be designated "customers' account(s)".

2. With respect to the securities credited in these accounts, we may assert any security interest, lien, right of retention or any similar rights over these securities only for claims which arise from the purchase, administration and safe custody of these securities. We shall inform Clearstream Banking AG immediately if a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.

3. Securities issued in KDD in dematerialized form are solely represented by book-entry records in the accounts of our participants. Securities immobilized with KDD and represented by global or definitive certificates are kept in safe custody either in our own vaults or by our depository banks in their own vaults in their home country in safekeeping accounts designated in our name. Under the respective depository agreements, such depository banks are not entitled, without specific approval, to entrust a third party in and outside their home country with the safe custody of such securities or to transfer them to another country.

Furthermore, we shall ensure by adequate agreement with our depository banks that this Three-Point-Declaration shall be applicable for our depository banks accordingly and that the depository banks shall be obliged to commit third parties entrusted with the effective safe custody accordingly as well.

For the securities deposited by KDD with a foreign Central Securities Depository, we ensure that a similar asset protection regime applies to the sub-deposited assets.

Yours sincerely,



Tomaž Boris Šnuderl  
President of the Management Board





Sociedad de Gestión de los Sistemas de Registro,  
Compensación y Liquidación de Valores, S.A.,  
Sociedad Unipersonal

**Confidential**

For the attention of:

Clearstream Banking AG  
Network Management  
42, avenue JF Kennedy  
L-1855 Luxembourg

31<sup>st</sup> of March of 2011

Dear Sirs,

1. We have taken due note that the securities, which we at present credit or which we shall in the future credit in the securities safekeeping accounts kept for CBF belong to the customers of CBF.
2. With respect to the securities credited in these accounts and listed in AIAF and Bolsa de Valores, we are not entitled to register any security interest, lien, right of retention or any similar rights over these securities. According to the Spanish applicable laws, the registration or such rights in the securities account corresponds to CBF. In relation to securities listed on Mercado de Deuda Pública Anotada, we will exclusively register such rights upon instructions of CBF. In addition, we shall inform CBF immediately upon being aware of any third party intending to levy any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.
3. The securities are issued and kept by means of book-entry. Therefore, there are no certificates or notes representing any of the securities. Likewise, there are not vaults or depository banks involved in the safekeeping.

Yours sincerely,

Elena Carnicero  
Deputy General Director

Palacio de la Bolsa  
Plaza de la Lealtad, 1  
28014 Madrid



COMPENSACIÓN Y LIQUIDACIÓN



Clearstream Banking AG  
Network Management  
42, avenue JF Kennedy  
L-1855 Luxembourg

**SIX SIS AG**  
Brandschenkestrasse 47  
CH-8002 Zürich  
  
Postanschrift:  
Postfach 1758  
CH-8021 Zürich  
  
T +41 44 288 4511  
F +41 44 288 4512  
[www.six-securities-services.com](http://www.six-securities-services.com)

Kontaktperson:  
Irene Heer  
T +41 58 399 4552  
F +41 58 499 4552  
[Irene.Heer@sisclear.com](mailto:Irene.Heer@sisclear.com)

Zürich, 14. Juni 2011

### **Drei-Punkte Erklärung**

Sehr geehrte Damen und Herren

Nachfolgende Erklärung findet ausschliesslich Anwendung auf Wertschriften, Effekten, Bucheffekten usw. (nachfolgend „Effekten“), die von Clearstream Banking AG für deutsche Depotbanken gehalten werden und welche im Rahmen der Verwahrung den Bedingungen des BaFin-Rundschreibens vom 2. Juli 2010 (Kapitel IV, Ziffer 2) unterliegen (nachfolgend „BaFin-RS“).

Ist in einem Einzelfall zwischen den Parteien strittig, ob bestimmte Effekten vom BaFin-RS erfasst sind und damit unter diese Erklärung fallen, ist Clearstream Banking AG hierfür beweispflichtig.

#### **Ziffer 1**

SIX SIS hat davon Kenntnis genommen, dass Effekten von Kunden von Clearstream Banking AG verwahrt werden.

#### **Ziffer 2**

Für den Fall, dass SIX SIS ein Effektengeschäft von Clearstream Banking AG vorfinanziert, behält sich SIX SIS bis zur Bezahlung der betreffenden Effekten ausdrücklich die Geltendmachung von Pfand-, Zurückbehaltungs- und ähnlicher Rechte vor, unabhängig davon, ob es sich um Effekten handelt, die vom BaFin-RS erfasst sind.

Abgesehen davon wird SIX SIS Pfand-, Zurückbehaltungs- und ähnliche Rechte an den Effekten nur wegen solcher Forderungen geltend machen, die sich aus deren Anschaffung, Verwaltung oder Verwahrung ergeben, selbst wenn Clearstream Banking AG nach Übergabe der Effekten zahlungsunfähig wird. Sollten von dritter Seite Pfändungen oder sonstige Zwangsvollstreckungsmassnahmen bezüglich der aufbewahrten Wertpapiere eingeleitet oder diese von anderen Eingriffen betroffen werden, wird SIX SIS Clearstream Banking AG unverzüglich benachrichtigen.

#### **Ziffer 3**

SIX SIS geht davon aus, dass Clearstream Banking AG damit einverstanden ist, dass die unter diese Erklärung fallenden Effekten innerhalb des gemäss den Allgemeinen Geschäftsbedingungen SIX SIS bekanntgegebenen Depotstellennetzes durch SIX SIS frei transferiert werden können.

Clearstream Banking AG wird vorgängig eines jeden Depotstellenwechsels entsprechende Mitteilung von SIX SIS erhalten.

Freundliche Grüsse

SIX SIS International



Robert Charles Almanas  
CEO  
SIX SIS International



Irene Heer  
Team Leader, Client Relationship Management  
SIX SIS AG

**Confidential**

For the attention of:

Clearstream Banking AG  
Network Management  
42, avenue JF Kennedy  
L-1855 Luxembourg

24 August 2018

**Three-Points-Declaration („Drei-Punkte-Erklärung“)**

Dear Sirs,

With reference to the Circular 8/2015 issued by the Bundesanstalt für  
Finanzdienstleistungsaufsicht (BaFin), we herewith represent that:

1. We have taken due note that the securities, which we at present credit or which we shall in future credit in the securities safekeeping accounts kept for Clearstream Banking AG, belong to the customers of Clearstream Banking AG. These accounts shall be designated "customers' account(s)".

2. With respect to the securities credited in these accounts, we may assert any security interest, lien, right of retention or any similar rights over these securities only for claims which arise from the purchase, administration and safe custody of these securities. We shall inform Clearstream Banking AG immediately if a third party levies any attachment upon or takes any other measures of compulsory execution in respect of these securities or of any other events which affect the securities.

3. Securities issued in NBB-SSS in dematerialized form are solely represented by book-entry records in the accounts of our participants. Securities immobilized with NBB-SSS and represented by global or definitive certificates are kept in safe custody either in our own vaults or by our depository banks in their own vaults in their home country in safekeeping accounts designated in our name. Under the respective depository agreements, such depository banks are not entitled, without specific approval, to entrust a third party in and outside their home country with the safe custody of such securities or to transfer them to another country.

Furthermore, we shall ensure by adequate agreement with our depository banks that this Three-Point-Declaration shall be applicable for our depository banks