

1. How can I access the documentation relating to the communication methods of the KID PRIIPs?

All documentation is published and constantly updated on the CONSOB website at page <https://www.consob.it/web/services-for-supervised-subjects/procedure-of-communication-of-priips-kid>.

2. Is it also possible to make the KIDs and structured data relating to CIS available to Consob through the systems indicated on the page relating to KID PRIIPs?

No, as indicated in the press release of 14 October 2022, in relation to CIS marketed in Italy to retail investors, the system for accessing KIDs by CONSOB, in compliance with the provisions of art. 34-bis.2 of the Issuers' Regulation, is represented exclusively by the DEPROF.

The credentials to be used to access the DEPROF system are the same used in the TELERACCOLTA and CONTRIBUTION declaration systems. For further details, please visit the page <https://www.consob.it/web/area-operativa-interattiva/sgr-sicav1>.

3. What are the differences between the SFTP channel and the WEB interface?

Generally speaking, SFTP channel is more suitable for massive filing and implies IT effort and know-how (you are expected to format XML according to XSD in technical specification and .ZIP according to operating instructions), while Web interface is preferable for occasional communications with minimal requirements for manufacturers (i.e. use of an updated web browser), in fact, it involves manual entry of structured data by the user.

4. In the case of manufacturer chooses to make the KID PRIIPs and the related structured data available to Consob solely via the web interface made available by Consob, how should he complete the manufacturer form to be sent to Consob for registration and issuing of credentials?

In this case it is necessary to complete only the first three sections of the creator form, all other sections must be left blank, including section VIII relating to IP addresses.

5. Which email addresses must be entered in section III relating to issuing credentials?

For higher security it is necessary to indicate two different e-mails, in one e-mail the User will be received and in the other the Password.

6. I cannot connect to the SFTP server, what can I do?

First of all, it is necessary to verify that the credentials entered are the correct ones for the environment to which user is trying to access, after that it is necessary to verify that the IP address from which user is connecting is among those included within the list declared in the section VIII of the manufacturer module (that is *white-list*) otherwise the connection will be blocked by the firewall.

As long as the problem persists despite the above checks, a support request can be sent to support_priips@consob.it specifying the following information useful for troubleshooting:

- User who attempt to connect;
- Aimed environment to be connected:
 - o production (*trf.consob.it:2226*);
 - o test (*trf.consob.it:2227*);
- IP address from which connection starts;
- SW client used to connect (e.g. Filezilla, WinSCP);
- Exact time of the connection error;
- Received error message;
- Screenshot of the error.

7. When uploading, the SFTP server returns an error of no write permission, how can I fix it?

The SFTP system has a reception mask that prevents uploading zip files which do not respect the naming convention described in the operating instructions. Whenever a user attempt to upload a zip archive with a file name that does not respect the naming convention, the system returns a write permission error.

Sometimes it happens that some SFTP client SW (e.g. WinSCP) add suffixes (e.g. *.filepart*) to the name of the file they are trying to upload in order to automatically manage the download resume in case of unexpected interruption of the transfer. Unfortunately, this suffix violates the naming convention, causing the above error, even in the presence of a filename that originally complied with the naming convention. In such cases, we suggest changing the default settings of your SFTP client SW to not use this feature.

8. How can I verify that a deposit was successful on the SFTP communication channel?

As described in the operating instructions, user can autonomously verify the success of the deposit by checking out its *Archive/Incoming/* folder (where all successful communications are automatically backed up) and relevant feedback on its *Outgoing/* folder (whose backup will continue to be available in the *Archive/Outgoing/* folder, once downloaded from *Outgoing/*) on SFTP server made available by CONSOB, both in test (*trf.consob.it:2227*) and production (*trf.consob.it:2226*) environments.

9. Can I use both SFTP and WEB interfaces to communicate KID PRIIPs?

Delegated subjects can use the SFTP channel exclusively; conversely, manufacturers who have not delegated the SFTP channel can use both interfaces. However, as described in the operating instructions: *“it is not allowed updating the KID and structured data through a system other than the one used for providing the first version / the first update of the KID (For instance, updating a KID via web interface is not allowed if the kid was provided in the first version via SFTP server and vice versa)”*, that is, it is always necessary to use the same communication channel (WEB or SFTP) for communications related to the same PRIIP.

The SFTP production credentials and WEB interface credentials are the same.

10. Is there a test environment for the WEB interface?

No. The only WEB environment available to manufacturers is the production one. However, where not finalized with the final submission (last step), the *wizard* inside the WEB Interface allows user to simulate the creation of a PRIIP communication and subsequently cancel it.

11. I sent a request to cancel the last deposit made via SFTP as indicated in the operating instructions, but I received negative feedback indicating that the operation cannot be carried out. What to do?

Unlike updates, SFTP communications for the *start* (creation) or *end* (closure) of a PRIIP cannot be directly canceled by the user with a cancellation flow. So far as these SFTP communications have been made by mistake and must be cancelled, a request must be sent via email to the supporto_priips@consob.it mailbox, taking care to put the priips@consob.it mailbox in carbon copy for the necessary checks.

12. I would like to proceed with the cancellation of a communication sent via the WEB interface, but I cannot find the suitable function, how can I solve it?

Web communications can be canceled as long as they have not been sent to CONSOB through the appropriate submission button which ends the upload wizard.

Once sent, they are definitely registered and can no longer be canceled by the user. The only way to cancel a web communication previously sent by mistake is to issue a request via email to the supporto_priips@consob.it mailbox, taking care to put the priips@consob.it mailbox in carbon copy for the necessary checks.

13. The manufacturer will soon be involved in an extraordinary operation, which will involve the change of company name (mergers, acquisitions, etc.) or the attribution of some financial products to other manufacturers (sale of company branch, etc.), What are the implications of making KIDs and structured data available to Consob?

In these cases, it is probable that after the extraordinary operation, the new communications updating the previously sent KIDs will be rejected by the system, as the association between the manufacturer and the product code of the KID is no longer recognized (this happens because the product code of this KID has previously been matched to the company name of the manufacturer who sent it). To avoid this issue, it is therefore necessary to communicate in advance (at least 10 working days) to priips@consob.it that the manufacturer will be involved in such an extraordinary operation, entering all the details possible and useful for understanding the problem. It will be the responsibility of the office in charge to identify the most appropriate operational solution for the context and communicate it to the manufacturer.

14. How many IP addresses can I configure in section VIII of the manufacturer form for accreditation?

As described in the manufacturer form itself: *“to make the SFTP service account operational, the manufacturer shall communicate to Consob one or more IP addresses (typically from 1 to 5 public IP static addresses, not full sub-nets) of the machines from which connections to this account will be made. Access will be allowed only from connections that originate from one of these addresses”*. For security reasons we recommend limiting the list to a maximum of 5 IP addresses which will be individually granted on our firewall. Wherever connections may originate from a greater number of IPs, we suggest implementing NAT/proxing mechanisms within the user's network.