

OPERATING MANUAL FOR THE ADVERTISING MESSAGE FILING SYSTEM

History of changes

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1 Glossary and acronyms

Acronimo	Descrizione
CAD	Digital Administration Code
DB	Data Base
ELTIF	European Long Term Investment Fun
ESG	Environmental Social Governance
ETF	Exchange Traded Fund
EU	European Union
EUGBs	Eu Green Bond
IBIP	Insurance-Based Investment Product
ISIN	International Securities Identification Number
KID	Key Information Document
KIID	Key Investor Information Document
LEI	Legal Entity Identifier
MIC	Market Identification Code
MiCAR	Markets in Crypto-Assets Regulation
MIFID	Markets in Financial Instruments Directive
MOP	Multi-Option Product
PDF	Portable Document Format
PRIIPs	Packaged Retail Investment and Insurance-Based Products
SFTP	Secure File Transfer Protocol
SICAF	Società di Investimento a CApitale Fisso
SICAV	Società di Investimento a CApitale Variabile
SID	Specific Information Document
UCITS	Undertakings for Collective Investment in Transferable Securities
URL	Uniform Resource Locator
XML	Extensible Markup Language
XSD	XML Schema Definition

2 Introduction

This document provides the information necessary for the use of the **DePub** web Internet front-end interface ("System") for the filing of advertising documentation relating to any advertisement concerning an offering to the public and/or an admission to trading for which a prospectus has been published following:

- i) Consob approval procedure and concurrent filing;
- ii) where approval is not required (i.e. Italian UCITS), filing with CONSOB according to the provisions provided;
- iii) passporting to Italy by other EU Authorities.

The System allows the filing of advertising documentation in terms of metadata and attachments (i.e. "Advertising Message").

The System allows access to any user registered with CONSOB as a distributor of advertising material (i.e. manufacturer¹ or his delegate).

This System was created by CONSOB, within the scope of the delegation contained in articles 101 and 113, paragraph 3, of Legislative Decree 58/98 (Consolidated Law on Finance) and art. 34-octies, paragraph 01, of Regulation 11971/1999 (Issuers Regulation).

The filing must be made according to the methods described below, following the instructions given in the masks and fields of the System.

A support service is available at the e-mail address <u>supporto msgpubb@consob.it</u> in addition to the CONSOB telephone help desk.

¹ For non-equity and equity products, the "Manufacturer" means the issuer, while for UCITS products, it means the manager.

3 System access and general interface features

The System can be used via any computer connected to the Internet. To access the System, some minimum technical requirements are needed. For correct operation, it is recommended to use a latest-generation browser (Microsoft Edge, Mozilla Firefox, Google Chrome, etc.) and a monitor with a resolution of at least 1024x768 pixels (1366x768 recommended). It is also required to enable *cookies* and *javascript* in your browser.

Once the browser is activated, user needs to display the web page of interest in order to start a web session. For new users, it is essential to complete the registration procedure as described in section 3.1, while users who have already registered can directly access the System (see section 3.2) using the credentials obtained during registration.

3.1 New user registration

Users who already have valid credentials for the Remote Collection and Filing system will be able to use a **simplified registration procedure** available at the following address.

https://www.sai.consob.it/sireg-porting/

Such a method is preferable where possible, as the users activated in this way will be immediately operational.

Conversely, new users who do not have such credentials will be required to use the **general procedure** and undergo a CONSOB issuing process.

This last general procedure is available at:

https://www.sai.consob.it/sireg-registration/

Once the user has accessed the indicated web page, they will be able to download a detailed guide for using the registration and credentials management procedure (SIReg).

In case of problems using the registration procedure, users can issue a support request for assistance to the following e-mail address:

sistemacredenziali@consob.it

3.2 User login

The access screen to the System can be reached from the CONSOB website (<u>www.consob.it</u> – English version), through the sections "SERVICES FOR SUPERVISED SUBJECTS" - "List of Services" – "Advertising activities for public offers" and, therefore, by clicking on the link "WEB interface for filing advertising documentation (DePub)" at the bottom of the page containing the operating instructions.

In the first login screen, the System, after having established a secure² connection among CONSOB server and the connected user's computer, proposes the form for entering the credentials (*username* and *password*).

The user is required to enter username and password in the fields named *Username or email* and *Password,* respectively, and press the *Login* button (see Figure 1). If the authentication data has been entered

² The system uses the *https* protocol

incorrectly, the System does not recognize the user and denies access, displaying the error page shown in Figure 2.





Figure 1 - Authentication form

Figure 2 - Authentication error

The user can log out of the System at any time by clicking on the *Logout* icon, located at the top right of the application screen. Once logged out, the System displays a specific message (see Figure 3).



Figure 3 – Successfully log out of the System

4 Home Page and main features

If authentication is successful, the *home page* is displayed (see Figure 4) which shows the personal data and contact details associated with the connected user as they appear in the CONSOB database.

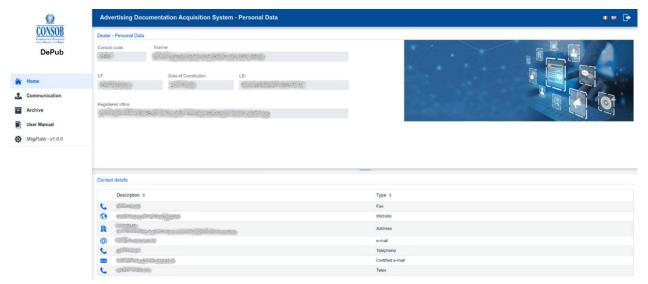


Figure 4 - Home Page

The interface is available in two languages, Italian and English. The language is automatically set to that of the browser used by the user; however, it is possible to set a different language among those available by means of the buttons in the header of the page at the top right next to the *Logout* one.

Additionally, a menu of functions that can be activated on the left, below the CONSOB logo, which is made up of the following links, is always available:

- Communication, which starts the filing process for the advertising message in terms of metadata and attachments³ (i.e. documents and multimedia files) as reported in section 5;
- Archive, which allows user to view all sent communications and print the relative transmission receipt (see Figure 5);
- User manual, which downloads the relevant document in the set language, if clicked;
- SW version of the current interface in use.

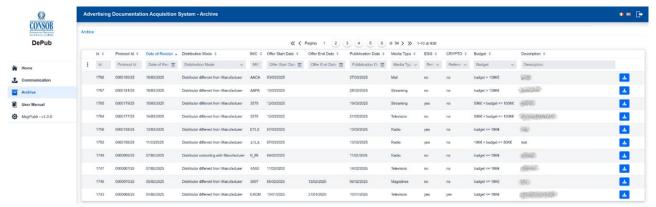


Figure 5 - Archive

³ Up to 20 attachments with a maximum size of 500MB each for each filing.

5 Communication of advertising documentation

The "Communication" section allows the user to access a 4-step wizard for acquiring metadata associated with the advertising message and uploading attached files.

- 1. *Communication Detail*: allows the user to acquire the general metadata associated with the whole advertising message.
- 2. Products associated with Communication⁴: allows the user to associate the advertising message with an offer to the public and/or an admission to trading for which a prospectus has been published following:
 - i) Consob approval procedure and concurrent filing;
 - ii) where approval is not required (i.e. Italian UCITS), filing with CONSOB according to the provisions provided;
 - iii) passporting to Italy by other EU Authorities.
- 3. *Communication attachments*: allows the user to upload documents and/or multimedia content up to a maximum of 20 files with a maximum size of 500MB each.
- 4. *Send Communication*: offers the user a summary of what has been acquired and the possibility of submitting the communication to fulfill the filing.

The above steps are described in the following sections. At the end of each step, the user can advance to the next step by clicking on the "Save" button⁵ which saves the draft of the advertising message in the Consob archives⁶, after validating what has been acquired⁷. Once the user has advanced to the next step of the wizard, he can also go back to the previous steps to make any changes, taking care to save the section each time so that the changes are consolidated.

⁴ Multiple offers can be associated up to a maximum of 5000 Products.

⁵ The "Restore" button, on the other hand, loads the latest version of the advertising message from CONSOB archives.

⁶ A user logout and subsequent login to the System will retain all information saved in the last session.

⁷ If validation is not successful, an error message will be returned to the user containing instructions on the corrections to be made for the operations to be successful.

5.1 Communication detail

Within this section the user can acquire general data associated with the communication of an advertising initiative containing one or more messages shown in Table 1 through the interface shown in Figure 6.

Data associated to		FORMAT	ODZIONAL
NAME	DESCRIPTION	FORMAT	OPZIONAL
Documentation description	Cover letter describing the filed advertising material as a whole in a multi-line flat text.	String max 4000 chars (non-standardized descriptive type)	NO
Distributing subject	Distributing subject Manufacturer / Subject other than the Manufacturer Option selection (enumeration): Manufacturer / Subject different from the Manufacturer		NO
Trading market	Identifier of the target market where the products relating to the advertising material are traded.	Option selection (enumeration): Market Identification Code (MIC) as codified in MIFID2 with the addition of the following 3 alternative codes: - 0_00 Not Listed - 0_0M Crypto Asset Trading Platform (MiCAR) - 0_99 Other	NO
Offer start date	Start date of advertised offer / start of negotiations.	Data format ISO 8601 AAAA-MM-GG	NO
		Data format ISO 8601 AAAA-MM-GG	YES
Publication date	Advertisement publication date.	Data format ISO 8601 AAAA-MM-GG	NO
Media type	Predominant type of channel used for advertising.	Option selection (enumeration): (newspapers, magazines, television, radio, streaming, web, mail, email, distributors, other)	NO
Protocol to be rectified	Protocol number of the deposit to be rectified.	Closed list of deposits made.	YES
ESG references	Yes, if there are Environmental, Social, Governance references.	Boolean	NO
Crypto references	Yes, if there are references to Cryptocurrencies.	Boolean	NO
Budget expected	Planned budget for the dissemination of the advertising message.	Option selection (enumeration): - <= 10k€ -]10k€, 50k€] -]5k€, 100k€	NO

Table 1 - Data associated to communication

In case of admission to trading without prior offer, fill in the "Offer start date" with the start date of trading.

Whenever the offer end date (optional) is not filled in, it is intended that the advertised offer is open.

If the communication being compiled refers to a correction or integration to a previous communication, the association with the latter can be made by selecting the relevant protocol number from the "Protocol to be rectified" combo-box, which contains all protocols associated with successfully filed communications.

Whenever the distribution method is set to "Distributor coinciding with Creator", the user will be able to associate with the advertising message only products of which he is the manufacturer, in the next step of the wizard.

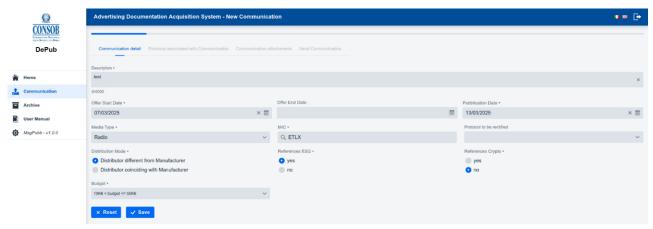


Figure 6 - Communication detail

The MIC (Market Identification Code) field allows the search and selection within the grid shown in Figure 7 of the target market identifier where products relating to the communication are traded.

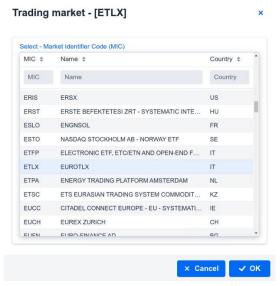


Figure 7 – Target market

The target market selection grid includes all trading markets regulated by the MIFID2 directive, to which 3 more have been added to address the limit cases of unlisted offer (0_00) , other unregulated market (0_99) and Crypto Asset Trading Platform (MiCAR -0_0M); for this last case, the user will also be able to subsequently associate off- catalogue products within the next step of the wizard, as a catalogue of MiCAR offers is not yet available among the collection subsystems.

Within the target market selection grid, the user can sort and filter the list of trading markets thanks to specific fields and graphic components; once the desired market has been selected, the OK button will allow the user to return to the message details, automatically filling in the MIC field with the just made selection.

5.2 Products associated with Communication

In this section the user may associate with the communication one or more financial products which are the subject of advertising relating to an offer to the public and/or an admission to trading for which a prospectus has been published following:

- i) Consob approval procedure and concurrent filing;
- ii) where approval is not required (i.e. Italian UCITS), filing with CONSOB according to the provisions provided;
- iii) passporting to Italy by other EU Authorities.

This can be done by selecting one or more products from the CONSOB catalogues (related to the following filing subsystems), towards which issuers/manufacturer and their delegates already fulfil the deposit:

- UCITS (Deprof);
- National Prospectus titles (Deproem);
- Passported Prospectus titles (SiPassUE);

To access the catalogue containing products of interest, the user will first select the filing subsystem from those listed in the dedicated combo-box as shown in Figure 8.

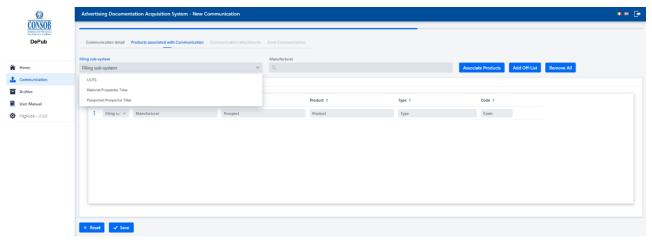


Figure 8 - Search for products to associate with Communication

Then, the user is expected to select the manufacturer⁸ from the relevant search field immediately next to the one described above; by clicking on this field a manufacturer selection grid opens as shown in Figure 9.

Within the selection grid, the user can sort and filter the list of manufacturers thanks to specific fields and graphic components; once the selection has been made, the user can return to the compilation page by clicking on the OK button, which automatically populates the search field with the selection just made.

⁸ In case of "Distributor coinciding with Manufacturer" distribution mode has been selected, the manufacturer is set to the user (i.e. distributor) itself.

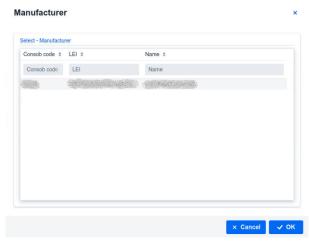


Figure 9 - Manufacturer selection

Afterwards, the user will be able to access the desired catalogue, consisting of the set of products registered in the CONSOB archives for the selected filing subsystem and manufacturer, by clicking on the "Associate Products" button (see Figure 8).

The above catalogue is presented as a multiple selection grid that shows the identifying details of the included products, it can be filtered and sorted through specific fields and graphic components, with the exception of columns relating to the filing subsystem and the manufacturer, which remain fixed to those selected, as shown in Figure 10.

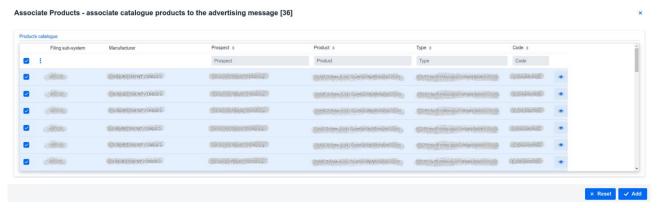


Figure 10 - Product Catalog

The product catalog grid also offers the user the possibility of showing or hiding some columns⁹ by clicking on the 3 vertical dots at the top left and of selecting all available products (instead of just some) thanks to the check-box next to them. Once the products in the open catalog have been selected by placing the flag on the left¹⁰, the user can add them to the overall set of products to be associated with the advertising message by clicking on the "Add"¹¹ button (see Figure 10).

⁹ To view all the data for a single specific product, instead of showing all the columns of the grid, user can click on the button at the bottom of the row associated with the product of interest.

¹⁰ The number of products selected is shown in the title and updated with each change in the selection.

¹¹ Conversely, the "Reset" button returns the selection to the panel's open state.

At this point the control returns to the main window, within which there is an additional grid showing the overall list of products associated with communication, as shown in Figure 11.

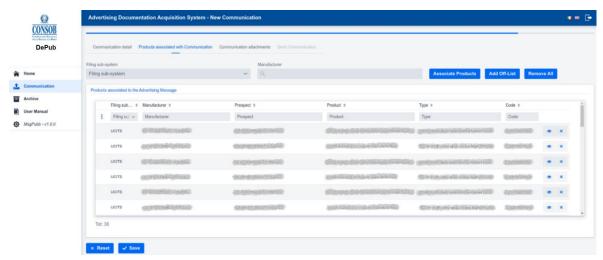


Figure 11 - Products associated with Communication

Since the user can repeatedly add products from different catalogues (e.g. from different filing subsystems and/or manufacturers) as well as to add "off-catalogue" products, the grid of products associated with the Communication will always show the overall updated status of all products associated with the Communication itself.

In addition to offering the possibility of filtering, sorting and modulating the visible columns as already described above for the catalogue, the grid of products associated with the Communication shown in Figure 11 displays, at the bottom, the total number of associated products and 2 buttons at the end of each row to, respectively, view the details (see Figure 12) and remove the relevant product from the list of associated ones¹³.

Each product associated with the Communication is identified by the following information:

- manufacturer's Consob code;
- manufacturer's LEI code (if present in CONSOB archive);
- manufacturer's name;
- filing subsystem;
- product code (ISIN o other internal code of the manufacturer);
- product type;
- prospectus identifier (where applicable);
- prospectus name (where applicable);
- product identifier;
- product name;

¹² By off-catalogue products we mean products for which the prospectus and conditions defined in the relevant Deproem (national prospectuses), Deprof (OICR) and SipassUE (passported prospectuses) catalogues have not yet been filed, as well as MiCAR crypto-assets.

¹³ To remove all products associated with the communication and thus re-initialize the association process, you can use the dedicated "Remove All" button.

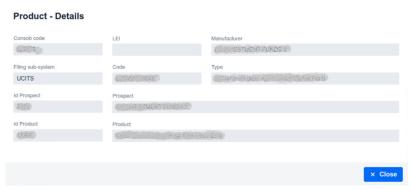


Figure 12 – Product detail

Where the products are not present in the catalogues in question, the user will still have the option of acquiring the identifying details of "off-catalogue" products to be associated with the advertising message (e.g. products not yet present in the Consob catalogues or MiCAR crypto-activities) reported in Table 2 through the interface shown in Figure 12.

NAME	DESCRIPTION	FORMAT	OPTIONAL
LEI	Manufacturer's LEI code.	String 20 chars - Pattern regex: [A-Z0-9]{18,18}[0-9]{2,2}	NO
Manufacturer name	Manufacturer's legal name.	String 255 chars	NO
Product name	Name assigned to the product by the manufacturer, where present in the relevant offer/admission to trading document (e.g. KID/KIID, final conditions, final terms) or into the white paper.	trading document (non-standardized descriptive type)	
Product type	Product type.	Option selection (enumeration): - UCITS (including ETF) - Certificates - Bonds - ETC - ETN - Notes - EU Green Bond - Shares - Convertible Bonds - Other Equities - Crypto Assets (Other Than) - Crypto Assets (ART) - Other	NO
ISIN	Product ISIN code (ISO 6166), where available.	String 12 chars - Pattern regex: [A-Z]{2,2}[A-Z0-9]{9,9}[0-9]{1,1}	CHOICE
Product internal code	Manufacturer internal product code. Alternative to ISIN code where not available.	String 255 chars - Pattern regex: [A-Z0-9]{1,255}	CHOICE

Table 2 - Off-catalogue product identification data

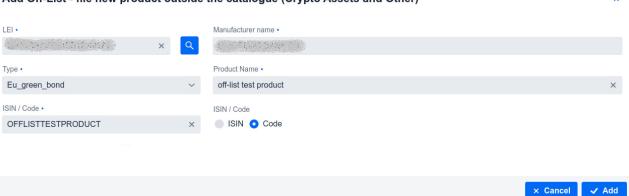


Figure 13 - Off-catalogue product

To acquire a new off-catalogue product not present in the catalogue, the user must first search for its manufacturer in the Consob register by entering the relevant LEI code in the text field of the same name (see Figure 12); by clicking on the search button, the user can then verify its presence in the register¹⁴ and automatically populate the immediately adjacent text field that reports its name.

After that, the user can proceed to select the type from the appropriate drop-down menu (which shows the items provided in Table 2), then acquire the code (ISIN or other code) and, finally, the name of the product. Whenever the ISIN code is not valid or, in general, is not valid according to the patterns¹⁵ indicated in Table 2, the System will return an error message.

If the user attempts to acquire as off-catalogue an item that is already listed in the catalogue (i.e. same designer and same product code), the system will return an error message.

Error messages will also be displayed to the user if the latter attempts to associate the same product more than once (whether from the catalogue or as off-catalogue), or if the maximum number of associated products (i.e. 5000) is exceeded.

¹⁴ If the LEI code is not present in the registry, the user can issue a request to the support email box.

¹⁵ In the case of a non-ISIN internal code that does not comply with the pattern indicated in **Table 2**, or contains non-alphanumeric characters or is longer than 255 characters, in order to comply the user must proceed with a transcoding that complies with the indicated requirements.

5.3 Communication Attachments

Within this section the user can upload attachments to the advertising message and acquire the metadata of interest shown in Table 3 through the interface shown in Figure 14.

NAME	DESCRIPTION	FORMAT	OPZIONAL
Title	Attachment title.	String max 255 chars (non-standardized descriptive type).	NO
Туре	Attachment type.	Option selection (enumeration): - Announcement (pdf) - Brochure (pdf) - Banner (gif/jpeg/pdf) - Webpage (pdf) - Flyer (pdf) - Interview video/audio (audio/video main types) - Newsletter (pdf) - Product Form (pdf) - Other (ZIP)	NO
Description	Attachment description.	String max 4000 chars (non-standardized descriptive type).	NO
Transcription	Transcription of the audio and text content published in the video.	String max 10000 chars (non-standardized descriptive type).	YES
JRL	Address where the attachment is published on the Internet.	String 2048 chars (pattern URL).	YES

Table 3 - metadata associated with an attachment

It is allowed to upload up to 20 attachments¹⁶ with a maximum size of 500MB each. To add¹⁷ another attachment, user can click on the "New Attachment" button after finishing the filing of the current one.

User is asked to provide a title, description, and type (selected from a combo-box) for the attachment. Depending on the attachment type selected, the graphical component that manages the upload function will filter specific file extensions on the user's file system through the browser.

Besides, user should fill in the URL¹⁸ field in case of the resource to which the attachment refers is also publicly available on the Internet (e.g. on a YouTube channel, another social network or website in general).

User should also provide the transcript of the audio track plus any subtitles or text contained in the video in the text area of the same name in the case of multimedia attachment.

 $^{^{16}}$ At least one must be loaded for the deposit to be effective.

¹⁷ Conversely, the "Remove Attachment" button removes the attachment currently being filled in.

¹⁸ Internet address in case of the resource is published online.

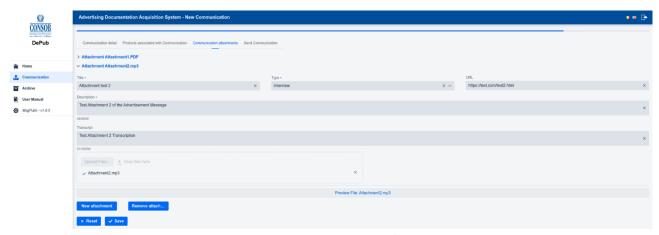


Figure 14 - Communication Attachments

If no attachment is uploaded or there is at least a violation of the requirements/constraints illustrated above, the System will return an error message.

5.4 Communication submission

The last step of the wizard for communicating advertising documentation presents the user with a summary of what was acquired during the previous steps and provides the identifier of the communication (still in draft) on the CONSOB archives.

After having verified that what is reported in this section corresponds to the user's deposit intentions¹⁹, the user can send the communication to CONSOB by clicking on the "Send" button shown in Figure 15.



Figure 15 - Communication submission

In case of successful submission, the page is updated with the submission outcome which reports the protocol number associated with the filing as shown in Figure 16.

At this stage the page also shows a new "Print" button that allows user to print the PDF receipt²⁰ for the deposit, as described in the next section 5.5.



Figure 16 - Communication submission outcome and Receipt printing

At this point the filing process is accomplished and the user can return to the home page. At any time, the just submitted Communication receipt, as well as any other receipt, can be downloaded from the archive, as described in section 4.

¹⁹ Once at this stage, the user can move between the steps of the wizard by clicking on the relevant tab, taking care to save each modification before submitting the communication.

²⁰ Preserved in accordance with the CAD Italian regulation.

5.5 Communication receipt

The receipt of the submitted communication is a PDF file (see the example in Figure 17, Figure 19) which summarizes the transmitted information and provides the registration keys with CONSOB.

All pages of the receipt have a header that reports the name of the System and the involved fulfillment and a footer that reports the date of reprint of the receipt and the page number.

The receipt reports the CONSOB logo followed by the information described below:

- the protocol number assigned by CONSOB;
- the date of receipt by CONSOB;
- a unique numeric identifier of the communication in the CONSOB archives;
- the name of the user who filed the communication;
- the legal office of the user who filed the communication;
- a summary of the metadata associated with the whole advertising message for which the user performed the data entry during the filing phase (i.e. Message Details);
- a summary of the metadata associated with each attachment uploaded by the user during the filing phase (i.e. Message Attachments) including the hash²¹ of the attached file, both in the form of a string and two-dimensional barcode, which identifies its content;
- a table containing the identifiers of the offers associated with the message (i.e. Products associated with the message).

-

²¹ Hash calculated with SHA 256 algorithm.



Protocol number: 0000156/25 Reception date: 2025-03-11

Advertising Messages - communication n. 1750

Distributor: @ International Control C

Message details

Distribution mode: Distributor different from Manufacturer

Trading Market: ETLX - EUROTLX [IT]

Offer period: 2025-03-07 - null

Publication date: 2025-03-13

Media Type: Radio References: ESG

Budget: 10K€ < budget <= 50K€

Description:

test

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Message attachments

Attachment: Attachment test 1

File Hash: 5f70bf18a086007016e948b04aed3b82103a36bea41755b6cddfaf10ace3c6ef

Filename: Attachment1.PDF

Type: brochure

URL: https://test.com/test1.html

Description: Test Attachment 1 of the Advertisement Message

Attachment: Attachment test 2

File Hash: 5f70bf18a086007016e948b04aed3b82103a36bea41755b6cddfaf10ace3c6ef



Filename: Attachment2.mp3

Type: interview

URL: https://test.com/test2.html

Description: Test Attachment 2 of the Advertisement Message

Products associated with the message

Catalogue	Issuer	Prospect	Product	Code	Typology
ICITS					
CITS					
ICITS					
rypto e.a.	of a first contract to the		off-list test product	OFFLISTTESTPRODUCT	EU_GREEN_BOND
ICITS					
ICITS				-0-0-0-00	
ICITS					
ICITS					
ICITS					
CITS					
CITS					
CITS					
ICITS				-0-00000	
CITS					
ICITS					
ICITS					
CITS				0.00000	
CITS					
CITS					
CITS				0.00000	
сітѕ					
CITS					
CITS				-0-0-0-00	
CITS					
ICITS				0.00000	
JCITS					