

ANNEX – MiFID II Transaction Reporting

1. Reporting Obligation and Transmission

Article 26 of the MiFID II regulation (MiFIR) states that investment firms which execute transactions in financial instruments shall report complete and accurate details of such transactions to the competent authority as quickly as possible, and no later than the close of the following working day.

This reporting obligation is avoided when the investment firm uses transmission as described in article 4 of the Commission Delegated Regulation (EU) 2017/590 (= RTS22). When using this transmission possibility, the party receiving the order (= KBC Bank), includes the details of the end-client of the ordering party (= the wealth manager) in its own transaction reporting.

Please note that transmission is not possible for:

- transactions on house account (of the wealth manager)
- transactions executed using another broker

2. Reporting via Transmission

If the wealth manager wants to use transmission, he needs to provide all information that KBC Bank requires to report correctly. This information should be provided at the latest upon order entry:

- Full and correct details of the end-clients:
 - o First name(s) and surname(s)
 - o Date of birth
 - o All nationalities + the corresponding national identifiers and/or passport numbers
 - o The LEI code for legal entities
- The management type of the account (discretionary, ...)
- The personal details of the person responsible for the investment decisions for the discretionary accounts
- For non-discretionary accounts: upon order entry, the decision maker if he/she is not (one of) the account holder(s)
(when the decision maker is not or cannot be communicated upon order entry, the transaction will be reported as if the account holder himself has made the decision)

KBC Bank will not provide the wealth manager with a copy or extract of the transaction report as this report contains KBC Bank's own transactions.

KBC Bank will verify whether the order details received contain obvious errors or omissions before submitting a transaction report.