

**ΠΡΟΣ** : Εισηγμένους Εκδότες στο Χρηματιστήριο Αξιών Κύπρου  
**ΑΠΟ** : Κύριο Νίκο Τρυπάτσα, Πρώτο Λειτουργό ΧΑΚ  
**ΘΕΜΑ** : **Επικαιροποιημένη αίτηση για έκδοση Κωδικών LEI/  
Ευρωπαϊκή Οδηγία MiFID II**  
**ΗΜΕΡ.** : 11 Μαΐου, 2017  
**ΑΡ. ΕΓΚ.** : **08 - 2017**

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Κυρίες / Κύριοι,

Αναφερόμαστε στην Εγκύκλιο του ΧΑΚ με ημερ. 10/5/2017 και αριθμό 06 – 2017 σχετικά με το πιο πάνω θέμα. Σύμφωνα με νεότερη ενημέρωση που μόλις έχει αποσταλεί στο ΧΑΚ από την αρμόδια Αρχή έκδοσης των Κωδικών LEI, σας αποστέλλουμε επικαιροποιημένο έντυπο προς απόκτηση του Κωδικού LEI καθώς και επεξηγηματικούς όρους. Σύμφωνα με τη σχετική αυτή επικαιροποίηση, τα πρόσθετα πεδία που αφορούν στην επικαιροποιημένη αίτηση, εστιάζονται στην περίπτωση όπου ο αιτητής έχει μητρική εταιρεία όπως περιγράφεται εκτενέστερα στο επισυναπτόμενο έντυπο.

Παρακαλούμε συνεπώς όπως για σκοπούς εξασφάλισης του Κωδικού LEI χρησιμοποιήσετε την επισυναπτόμενη αίτηση και όπως αγνοήσετε το έντυπο που επισυνάπτεται στην εγκύκλιο 06-2017.

Ευχαριστούμε εκ των προτέρων για την κατανόηση σας και προσβλέπουμε στη συνεργασία σας.

Με εκτίμηση

Νίκος Τρυπάτσας  
Πρώτος Λειτουργός

Εσώκλ.

# Legal Entity Identifier(LEI)

## Εισαγωγή

Το Χρηματιστήριο Αξιών Κύπρου (ΧΑΚ) στα πλαίσια της συνεχούς προσπάθειας του για αναβάθμιση των Αγορών, προϊόντων και υπηρεσιών του και με απώτερο στόχο την εξυπηρέτηση των συντελεστών της Αγοράς καθώς και του επενδυτικού κοινού προχώρησε σε συμφωνία/ συνεργασία με το London Stock Exchange (LSE)/ Unavista για την έκδοση σε ενδιαφερόμενα Νομικά Πρόσωπα Κωδικών Legal Entity Identifier (LEI). Το ΧΑΚ παρέχει σε ενδιαφερόμενα Νομικά Πρόσωπα τη δυνατότητα να αποκτήσουν κωδικό LEI με τη διαδικασία του Assisted Registration.

Ο Κωδικός LEI είναι ένας 20ψήφιος αλφαριθμητικός κωδικός ο οποίος περιέχει πληροφορίες για εταιρείες όπως π.χ. επωνυμία της νομικής οντότητας, διεύθυνση των κεντρικών γραφείων της, στοιχεία του οικονομικού διευθυντή της κ.α. και επιτρέπει τη ξεκάθαρη και μοναδική ταυτοποίηση νομικών προσώπων που συμμετέχουν στις Χρηματιστηριακές Αγορές.

Η υπεύθυνη Εποπτική Αρχή η οποία συντονίζει και εποπτεύει την έκδοση των κωδικών LEIs είναι η 'Legal Entity Identifier Regulatory Oversight Committee' (LEIROC) και οι κωδικοί εκδίδονται από πιστοποιημένα Local Operating Units (LOUs).

Συγκεκριμένα το ΧΑΚ έχει αναλάβει:

- Την παραλαβή αιτήματος από το ενδιαφερόμενο Νομικό Πρόσωπο – Αιτητή.
- Την παραλαβή και έλεγχο των απαιτούμενων νομιμοποιητικών εγγράφων που αφορούν τον αιτητή.
- Την είσπραξη του χρηματικού αντίτιμου για την έκδοση κωδικού LEI.
- Κατόπιν εξουσιοδότησης από τον αιτητή, την εισαγωγή εκ μέρους του των απαραίτητων στοιχείων στην πλατφόρμα Unavista. Η εξουσιοδότηση αποτελεί αναπόσπαστο μέρος της αίτησης.
- Παρακολούθηση της διαδικασίας έκδοσης του κωδικού LEI.
- Παραλαβή του κωδικού και γνωστοποίηση του στο Νομικό Πρόσωπο – Αιτητή.

## Διαδικασία Έκδοσης Κωδικού LEI

1. Κατάθεση, σε πρωτότυπη μορφή, του εντύπου «**Application for the issuance of Legal Entity Identifier**», δεόντως συμπληρωμένο και υπογεγραμμένο. Σημειώνεται ότι με την υποβολή του εντύπου και των απαραίτητων εγγράφων μέσω ηλεκτρονικού ταχυδρομείου ή μέσω φωτοηλεκμηνύματος, είναι εφικτό να γίνει ένας προκαταρκτικός έλεγχος, ωστόσο για να μπορέσει να καταχωρηθεί το αίτημα έκδοσης κωδικού LEI στο σύστημα του LSE/ Unavista, πρέπει τα εν' λόγω έγγραφα να παραληφθούν από το ΧΑΚ σε πρωτότυπη μορφή.
2. Μαζί με το πιο πάνω έντυπο, πρέπει να κατατεθούν πρόσφατα (εντός ενός μηνός από την ημερομηνία έκδοσης) και σε πρωτότυπη μορφή, έγγραφα εκπροσώπησης του νομικού προσώπου εκδομένα από Αρμόδια Αρχή. Σημειώνεται ότι και στην περίπτωση αυτή, ακολουθείται η υφιστάμενη πολιτική χρέωσης των Νομιμοποιητικών Εγγράφων που σήμερα

εφαρμόζεται στο ΧΑΚ. Περισσότερες πληροφορίες για τη σχετική τιμολογιακή πολιτική του ΧΑΚ βρίσκονται αναρτημένες στην ιστοσελίδα του, στην ενότητα [‘Τέλη και Δικαιώματα’](#).

3. Το εξουσιοδοτημένο άτομο το οποίο θα υπογράψει το έντυπο πρέπει να επισυνάψει αντίγραφο της ταυτότητας ή του διαβατηρίου του.
4. Κατάθεση στον ακόλουθο τραπεζικό λογαριασμό του σχετικού τέλους, το οποίο ανέρχεται στα €138,:

	<b>Bank of Cyprus Public Company Ltd</b>
<b>IBAN:</b>	CY83-0020-0120-0000-0005-0203-3400
<b>BIC CODE:</b>	BCYPCY2N

Στην κατάθεση θα πρέπει πάντα να υποδεικνύετε ότι η κατάθεση αφορά έκδοση κωδικού LEI – “LEI – (όνομα αιτητή)”.

Επισημαίνεται ότι υπάρχει ετήσια χρέωση συντήρησης του κωδικού LEI, η οποία ανέρχεται στα €84.

Τέλος σημειώνεται ότι, στην περίπτωση που κάποιος κωδικός δεν ανανεωθεί σε ετήσια βάση τότε το σύστημα της Unavista θα σημειώνει ότι ο κωδικός αυτός έχει καταστεί ληξιπρόθεσμος.

## APPLICATION FOR THE ISSUANCE OF LEGAL ENTITY IDENTIFIER

To: Central Securities Depository/Registry, of the Cyprus Stock Exchange (CSE)

**To be completed by the CSE**

Date \_\_\_\_\_

Time received \_\_\_\_\_

### Applicant's Data

*Information with asterisk (\*) is not mandatory – If available strongly requested to be submitted*

Legal Entity Name

IN GREEK

Alternative Name \*

Anglicised Name

Legal Form Country

Legal Form

Headquarters Address

City

Zip

Country

Legal Formation Address 1

City

Zip

Country

Country of Business Registry

Name

Official Business Registry

Official Business Registry Reference

Number

Legal Entity Website\*

Applicant's Email

BIC \*

ISIN \*

Tax Country

Number

### Attached Documents

- Legal representation document  (more information see *Fill-in instructions*)
- Bank Payment Slip
- A certificate of incorporation or official document relevant to the entity such a prospectus for funds, trust deed for trusts etc

**Parent Company Information: Please complete 1 of the 3 forms for Parent Company Information.**

**(1). If your company has a Direct and Ultimate Parent Company please complete the details below:**

Field	Direct Parent Company	Ultimate Parent Company
<b>Description of Relationship Type</b>	DIRECTLY CONSOLIDATED_BY The Direct Parent entity is the closest fully consolidating parent to the LEI entity in any applicable hierarchical ownership structure	ULTIMATELY CONSOLIDATED The Ultimate Parent entity is the most distant fully consolidating parent from the LEI entity in any applicable hierarchical ownership structure.
<b>Parent Name</b>		
<b>HQ address</b>	Headquarters address of Direct Parent Company <b>Address line1:</b>  <b>Town or City:</b>  <b>Region:</b>  <b>Country:</b>  <b>Postcode:</b>	Headquarters address of Ultimate Parent Company <b>Address line1:</b>  <b>Town or City:</b>  <b>Region:</b>  <b>Country:</b>  <b>Postcode:</b>
<b>Legal Address</b>	Legal/registered address of Direct Parent Company <b>Address line1:</b>  <b>Town or City:</b>  <b>Region:</b>  <b>Country:</b>  <b>Postcode:</b>	Legal/registered address of Ultimate Parent Company <b>Address line1:</b>  <b>Town or City:</b>  <b>Region:</b>  <b>Country:</b>  <b>Postcode:</b>
<b>Registration Authority</b>	Business Registry of Direct Parent Company	Business Registry of Ultimate Parent Company
<b>Registry Entity Id</b>	Business Registry Number of Direct Parent Company	Business Registry Number of Ultimate Parent Company
<b>Validation Documents</b>	Tick the appropriate document that confirms the group structure  <input type="checkbox"/> ACCOUNTS_FILING <input type="checkbox"/> CONTRACTS <input type="checkbox"/> OTHER_OFFICIAL_DOCUMENTS <input type="checkbox"/> REGULATORY_FILING <input type="checkbox"/> SUPPORTING_DOCUMENTS	Tick the appropriate document that confirms the group structure  <input type="checkbox"/> ACCOUNTS_FILING <input type="checkbox"/> CONTRACTS <input type="checkbox"/> OTHER_OFFICIAL_DOCUMENTS <input type="checkbox"/> REGULATORY_FILING <input type="checkbox"/> SUPPORTING_DOCUMENTS
<b>Upload Validation Document Confirming Group Structure</b>	<i>Upload document confirming relationship between Parent and LEI entity</i>  <i>Attach document such as financial statement, regulatory filing, org chart of 50%+ ownership, group structure</i>	<i>Upload document confirming relationship between Parent and LEI entity</i>  <i>Attach document such as financial statement, regulatory filing, org chart of 50%+ ownership, group structure</i>
<b>Accounting Consolidating Standard (Qualifier Category)</b>	Tick the appropriate accounting standard of the group structure  <input type="checkbox"/> OTHER_ACCOUNTING_STANDARD <input type="checkbox"/> IFRS (International Financial Reporting Standard) <input type="checkbox"/> US_GAAP (United States-Generally Accepted Accounting Principles)	Tick the appropriate accounting standard of the group structure  <input type="checkbox"/> OTHER_ACCOUNTING_STANDARD <input type="checkbox"/> IFRS (International Financial Reporting Standard) <input type="checkbox"/> US_GAAP (United States-Generally Accepted Accounting Principles)

**(2). If your company does not have a Direct or Ultimate Parent Company please select the reason why:**

Field	Direct Parent Company	Ultimate Parent Company
Parent	(N/A) If the LEI entity has no Parent company	(N/A) If the LEI entity has no Parent company
Exception Reasons	<p>Select the reason explaining why the LEI entity has no Parent company:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <i>NATURAL_PERSONS: (The parent entity is a natural person)</i></li> <li><input type="checkbox"/> <i>NO_KNOWN_PERSON: (There is no parent entity to control the entity e.g. Joint venture, diversified shareholding)</i></li> <li><input type="checkbox"/> <i>NON_CONSOLIDATING: (There is no parent according to the consolidated financial statements.)</i></li> </ul>	<p>Select the reason explaining why the LEI entity has no Parent company:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <i>NATURAL_PERSONS: (The parent entity is a natural person)</i></li> <li><input type="checkbox"/> <i>NO_KNOWN_PERSON: (There is no parent entity to control the entity e.g. Joint venture, diversified shareholding)</i></li> <li><input type="checkbox"/> <i>NON_CONSOLIDATING: (There is no parent according to the consolidated financial statements.)</i></li> </ul>

**(3). If your company cannot disclose the Direct or Ultimate Parent Company please select the reason why:**

Field	Direct Parent Company	Ultimate Parent Company
Parent	(N/A) If there is a legal reason the Parent company information cannot be provided	(N/A) If there is a legal reason the Parent company information cannot be provided
Exception Reasons	<p>Select the reason explaining why the LEI entity cannot disclose the Parent company:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <i>LEGAL_OBSTACLES (Obstacles in the laws or regulations of a jurisdiction prevent providing or publishing this information.)</i></li> <li><input type="checkbox"/> <i>CONSENT_NOT_OBTAINED (The consent of the parent was necessary under the applicable legal framework and the parent did not consent or could not be contacted.)</i></li> <li><input type="checkbox"/> <i>BINDING_LEGAL_COMMITMENTS (Binding legal commitments (other than the laws or regulations of a jurisdiction), such as articles governing the legal entity or a contract, prevent providing or publishing this information.)</i></li> <li><input type="checkbox"/> <i>DETRIMENT_NOT_EXCLUDED (The child entity has sought to consult the parent entity about the reporting of the parent information to the GLEIS but could not confirm the absence of detriment in a way that can appropriately prevent liability risks for the child entity (or those acting on its behalf) under the applicable legal framework. The disclosure of this information would be detrimental to the legal entity or the relevant parent.)</i></li> <li><input type="checkbox"/> <i>DISCLOSURE_DETRIMENTAL (The disclosure of this information would be detrimental to the legal entity or the relevant parent. This will include reasons generally accepted by public authorities in similar circumstances, based on a declaration by the entity.)</i></li> </ul>	<p>Select the reason explaining why the LEI entity cannot disclose the Parent company:</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> <i>LEGAL_OBSTACLES (Obstacles in the laws or regulations of a jurisdiction prevent providing or publishing this information.)</i></li> <li><input type="checkbox"/> <i>CONSENT_NOT_OBTAINED (The consent of the parent was necessary under the applicable legal framework and the parent did not consent or could not be contacted.)</i></li> <li><input type="checkbox"/> <i>BINDING_LEGAL_COMMITMENTS (Binding legal commitments (other than the laws or regulations of a jurisdiction), such as articles governing the legal entity or a contract, prevent providing or publishing this information.)</i></li> <li><input type="checkbox"/> <i>DETRIMENT_NOT_EXCLUDED (The child entity has sought to consult the parent entity about the reporting of the parent information to the GLEIS but could not confirm the absence of detriment in a way that can appropriately prevent liability risks for the child entity (or those acting on its behalf) under the applicable legal framework. The disclosure of this information would be detrimental to the legal entity or the relevant parent.)</i></li> <li><input type="checkbox"/> <i>DISCLOSURE_DETRIMENTAL (The disclosure of this information would be detrimental to the legal entity or the relevant parent. This will include reasons generally accepted by public authorities in similar circumstances, based on a declaration by the entity.)</i></li> </ul>

**The undersigned legal representative(s) of applicant responsibly declare the following:**

1. All the submitted data and documents attached to this Application are genuine, full and accurate.
2. The submission of this Application is considered as an irrevocable authorisation to the Cyprus Stock Exchange to carry out, in our name and on our behalf, all necessary and lawful actions for:
  - a) The issuance of the Legal Entity Identifier (L.E.I.) by the Local Operating Unit that CSE is cooperating with
  - b) The receiving of the LEI on our behalf by the competent LOU.
3. We undertake to notify the CSE our updated identification data immediately after any change and on an annual basis from the submission of this Application.
4. Documents submitted in any other language other than Greek or English must be translated by the competent authority in Cyprus

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Applicant's Signature: \_\_\_\_\_ ID/Passport: \_\_\_\_\_

Full Name of the Applicant: \_\_\_\_\_ Date: \_\_\_\_\_

Position within Organisation \_\_\_\_\_

Company Stamp: \_\_\_\_\_

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(For use by the Stock Exchange)

Checked: By \_\_\_\_\_ Signature \_\_\_\_\_

Entered on: Date \_\_\_\_\_ Time \_\_\_\_\_ By \_\_\_\_\_ Signature \_\_\_\_\_

File Reference: \_\_\_\_\_ By \_\_\_\_\_

Entry checked on: By \_\_\_\_\_ Signature \_\_\_\_\_

CSE fees \_\_\_\_\_

# APPLICATION FOR THE ISSUANCE OF LEGAL ENTITY IDENTIFIER – BULK APPLICATION

The undersigned legal representative(s) of applicant named overleaf is authorized to request LEIS for the following legal entities:

1.     **Legal Entity Name**  
          **IN GREEK** \_\_\_\_\_  
          **Anglicised Name** \_\_\_\_\_
2.     **Legal Entity Name**  
          **IN GREEK** \_\_\_\_\_  
          **Anglicized Name** \_\_\_\_\_
3.     **Legal Entity Name**  
          **IN GREEK** \_\_\_\_\_  
          **Anglicized Name** \_\_\_\_\_
4.     **Legal Entity Name**  
          **IN GREEK** \_\_\_\_\_  
          **Anglicized Name** \_\_\_\_\_
5.     **Legal Entity Name**  
          **IN GREEK** \_\_\_\_\_  
          **Anglicized Name** \_\_\_\_\_
6.     **Legal Entity Name**  
          **IN GREEK** \_\_\_\_\_  
          **Anglicized Name** \_\_\_\_\_
7.     **Legal Entity Name**  
          **IN GREEK** \_\_\_\_\_  
          **Anglicized Name** \_\_\_\_\_
8.     **Legal Entity Name**  
          **IN GREEK** \_\_\_\_\_  
          **Anglicized Name** \_\_\_\_\_
9.     **Legal Entity Name**  
          **IN GREEK** \_\_\_\_\_  
          **Anglicized Name** \_\_\_\_\_
10.    **Legal Entity Name**  
          **IN GREEK** \_\_\_\_\_  
          **Anglicized Name** \_\_\_\_\_

Please consult the following document "LEI Fund Guidance, v. 40, 12/5/2013" for multiple entities e.g. funds, [http://www.qfma.org/uploadedFiles/Initiatives/Legal\\_Entity\\_Identifier\\_\(LEI\)/LEI-Fund-Guidance-2013.pdf](http://www.qfma.org/uploadedFiles/Initiatives/Legal_Entity_Identifier_(LEI)/LEI-Fund-Guidance-2013.pdf)

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## Attached documents

- Legal representation document  (more information see *Fill-in instructions*)
  - Bank Payment Slip
  - A certificate of incorporation or official document relevant to the entity such a prospectus for funds, trust deed for trusts etc
-



**The undersigned legal representative(s) of applicant responsibly declare the following:**

1. All the submitted data and documents attached to this Application are genuine, full and accurate.
2. The submission of this Application is considered as an irrevocable authorisation to the Cyprus Stock Exchange to carry out, in our name and on our behalf, all necessary and lawful actions for:
  - a) the issuance of the Legal Entity Identifier (L.E.I.) by the Local Operating Unit that CSE is cooperating with
  - b) the receiving of the LEI on our behalf by the competent LOU.
3. We undertake to notify the CSE our updated identification data immediately after any change and on an annual basis from the submission of this Application.
4. Documents submitted in any other language other than Greek or English must be translated by the competent authority in Cyprus

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Applicant's Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Full Name of the Applicant: \_\_\_\_\_

ID/Passport: \_\_\_\_\_

Position within organisation \_\_\_\_\_

Company Stamp: \_\_\_\_\_

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(For use by the Stock Exchange)

Checked: By \_\_\_\_\_ Signature \_\_\_\_\_

Entered on: Date \_\_\_\_\_ Time \_\_\_\_\_ By \_\_\_\_\_ Signature \_\_\_\_\_

File Reference: \_\_\_\_\_ By \_\_\_\_\_

Entry checked on: By \_\_\_\_\_ Signature \_\_\_\_\_

CSE fees \_\_\_\_\_

## **Terminology Explained:**

### **Relationship Type**

#### **IS\_DIRECTLY\_CONSOLIDATED\_BY**

The child entity directly consolidated by the parent entity: the "child" entity has its accounts fully consolidated by the "parent" entity, in the sense given by the accounting standard(s) specified in RelationshipQualifiers; the parent entity is the closest fully consolidating parent to the child entity in any applicable hierarchical ownership structure.

#### **IS\_ULTIMATELY\_CONSOLIDATED\_BY**

The child entity is ultimately consolidated by the parent entity. The "child" entity has its accounts fully consolidated by the "parent" entity, in the sense given by the accounting standard(s) specified in RelationshipQualifiers; the parent entity is the most distant fully consolidating parent from the child entity in any applicable hierarchical ownership structure.

#### **IS\_INTERNATIONAL\_BRANCH\_OF**

The child entity is an international branch of the legal entity designated by parent entity (in jurisdiction country of child entity). The Parent entity is the Head Office and MUST be an LEI.

### **Qualifier Category**

#### **US\_GAAP**

United States-Generally Accepted Accounting Principles.

#### **IFRS**

International Financial Reporting Standard (developed by the International Accounting Standards Board – IASB see <http://www.ifrs.org>).

#### **OTHER\_ACCOUNTING\_STANDARD**

A financial reporting (accounting) standard not otherwise listed in the latest version of the relationship data file format.

### **Validation Documents**

#### **ACCOUNTS\_FILING**

A consolidated financial (accounting) statement, prepared and submitted to the relevant authority.

#### **REGULATORY\_FILING**

An annual regulatory filing providing public information on parent relationships.

#### **SUPPORTING\_DOCUMENTS**

Other documents supporting the preparation of consolidated financial statements.

## **CONTRACTS**

Contract(s) attesting to the validity of the relationship.

## **OTHER\_OFFICIAL\_DOCUMENTS**

Other official document(s) attesting to the validity of the relationship.

### **Exception Reason**

If a Parent entity does not exist:

## **NATURAL\_PERSONS**

The parent entity is a natural person; There is no parent according to the definition used, because the entity is controlled by natural person(s) without any intermediate legal entity meeting the definition of accounting consolidating parent.

## **NO\_KNOWN\_PERSON**

There is no parent entity to control the entity (e.g. Joint venture, diversified shareholding); There is no parent according to the definition used, because the entity is controlled by legal entities not subject to preparing consolidated financial statements.

## **NON\_CONSOLIDATING**

There is no parent according to the consolidated financial statements; There is no parent according to the definition used, because there is no known person controlling the entity (e.g., diversified shareholding).

If a Parent entity exists but cannot be disclosed:

## **LEGAL\_OBSTACLES**

Obstacles in the laws or regulations of a jurisdiction prevent providing or publishing this information. This does not include cases where, under the applicable legal framework disclosing the parent relationship would require the consent of one of the entities in the relationship, or both, and such consent could not be obtained (in these cases "CONSENT\_NOT\_OBTAINED" is the applicable code). The LOU is not expected to verify or analyse whether the legal framework constitutes a legal obstacle.

## **CONSENT\_NOT\_OBTAINED**

Obstacles in the laws or regulations of a jurisdiction prevent providing or publishing this information: "the consent of the parent was necessary under the applicable legal framework and the parent did not consent or could not be contacted". Note that it is a responsibility of a child entity to seek parent consent when necessary for disclosing the parent relationship, for instance by inviting in writing the parent entity to provide consent. The LOU is not expected to verify or analyse whether the legal framework constitutes a legal obstacle.

## **BINDING\_LEGAL\_COMMITMENTS**

Binding legal commitments (other than the laws or regulations of a jurisdiction), such as articles governing the legal entity or a contract, prevent providing or publishing this information. The LOU is not expected to verify or analyse whether the legal framework constitutes a legal obstacle.

## **DETRIMENT\_NOT\_EXCLUDED**

The child entity has sought to consult the parent entity about the reporting of the parent information to the GLEIS but could not confirm the absence of detriment in a way that can appropriately prevent liability risks for the child entity (or those acting on its behalf) under the applicable legal framework. The disclosure of this information would be detrimental to the legal entity or the relevant parent. This will include reasons generally accepted by public authorities in similar circumstances, based on a declaration by the entity. This reason may be used only when all following cumulative circumstances apply: [i) the parent could not be informed via the GLEIS and have the possibility to correct the relationship information before publication (including raising a cause for opt out, either because the parent does not have an LEI, or it has an LEI but the GLEIS has not yet implemented such system;] ii) the relationship is not already in the public domain (information being in the public domain assumes here that the way the information came into the public domain did not infringe the applicable legal framework); iii) the child entity has reasons to believe that the parent may consider disclosure to be detrimental; (iv) the child entity has sought to consult the parent entity of the reporting of the parent information to the GLEIS but could not confirm the absence of detriment in a way that can appropriately prevent liability risks for the child entity (or those acting on its behalf) under the applicable legal framework.

## **DISCLOSURE\_DETRIMENTAL**

The disclosure of this information would be detrimental to the legal entity or the relevant parent. This will include reasons generally accepted by public authorities in similar circumstances, based on a declaration by the entity.