

WFC Single Disclosure Report 2020**AGC answers**

Date submitted
02/11/2020 09:16:57

General information

1 G01Q001 Please indicate the full name of the responding institution: <i>PFMI: Annex A - CSD disclosure template [CSD name]</i> <i>AGC: 0a</i>
KELER Ltd.

2 G01Q002 Registered address: <i>PFMI: n/a</i> <i>AGC: 0c</i>
Rákóczi út 70-72, H-1074 Budapest

3 G01Q003 Country of registered address: <i>PFMI: n/a</i> <i>AGC: 0d</i>
Hungary

6 G01Q006 The WFC, the AGC, CPMI and IOSCO encourage respondents to make their disclosure reports publicly available. Do you agree to make your response publicly available? <i>PFMI: n/a</i> <i>AGC: 99</i>
☐ Yes, my full response will be publicly available. I agree that my response can be published on the website of the WFC and on the website of the regional CSD association(s) which my CSD is a member of. ☒ Yes, my response will be public, but only for my answers to AGC questions. ☐ Yes, my response will be public, but only for my answers to PFMI questions. ☐ No, I do not wish my response to be publicly available.

7 G01Q007

How will you be making your answers publicly available?

PFMI: n/a

AGC: 99a

- ☒ Website
- ☒ Upon request
- ☐ OTHER:

8 G01Q008

This disclosure can also be found at the following web address(es):

PFMI: Annex A - CSD disclosure template [website URL]

AGC: 99b

<https://english.keler.hu/Key%20documents/Questionnaires/>

9 G01Q009

First and Last Name of the contact person:

PFMI: Annex A - CSD disclosure template [contact details]

AGC: 99c

Ms Fruzsina Anna Gonda

10 G01Q009A

Disclosure submission authorisation

- ☒ I hereby certify that I am authorised to submit this disclosure report on behalf of my institution.

11 G01Q010

Email address of the contact person:

PFMI: Annex A - CSD disclosure template [contact details]

AGC: 99h

gonda.fruzsinaanna@keler.hu

12 G01Q011

Telephone number (please include the international country code):

PFMI: n/a

AGC: 99e

+3614836132

13 G01Q012

How do you prefer to be contacted?

PFMI: n/a
AGC: 99d

- ☒ Telephone
☐ Fax
☐ mail/air courier
☒ e-mail

14 G01Q013
Fax number

PFMI: n/a
AGC: 99f

+3614836194

15 G01Q014
What is the preferred street address for mailing requests?

PFMI: n/a
AGC: 99g

Rákóczi út 70-72, H-1074 Budapest, Hungary

25 G01Q024
I am submitting up-to-date information in response to:

- ☒ The AGC questions and a report with only AGC answers will be generated
☐ The PFMI questions and a report with only PFMI answers will be generated
☐ Both the AGC and PFMI questions and a report with answers to both questionnaires will be generated

Legal Basis (PFMI Principle 1)

27 G02Q002
Under what regulation or statute is the CSD established and governed?

PFMI: n/a
AGC: 7

The CSDR ([Regulation \(EU\) No 909/2014 of the European Parliament and of the Council of 23 July 2014 on improving securities settlement in the European Union and on central securities depositories and amending Directives 98/26/EC and 2014/65/EU and Regulation \(EU\) No 236/2012](#)) and the related regulations constitute the most important set of rules related to the operation of KELER. It should be highlighted within

the framework of the Hungarian regulation that KELER is a central depository and special credit institution operating pursuant to Act CXX of 2001 on the Capital Market (Act on the Capital Market) and Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises (Act on Credit Institutions). Based on Act CXXXVIII of 2007 on Investment Firms and Commodity Dealers, and on the Regulations Governing their Activities (Investment Firms Act), KELER is entitled to provide ancillary investment services. KELER undertakes its activity in line with the requirements of the above laws, related additional legislation (e.g. the Act XXIII of 2003 on Settlement Finality in Payment and Securities Settlement Systems) and the applicable European Union rules, the orders, decrees of the Central Bank of Hungary, and the regulatory documents of KELER eg. KELER General Business Rules.

28 G02Q003

Is the regulation or statute electronically available?

PFMI: n/a

AGC: 7a

☒ Yes

☐ No

29 G02Q004

If regulation or statute is electronically available, please supply web address(es) here or upload document(s).

PFMI: n/a

AGC: 7b

KELER General Business Rules:

<https://english.keler.hu/Key%20documents/Regulatory%20documents/General%20Business%20Rules/>

30 G02Q005

filecount - Please supply document(s) here:

PFMI: n/a

AGC: 7c

Act_CCXXXVII_of_2013.pdf (1350KB)	Act CCXXXVII of 2013	
Act_CXX_of_2001.pdf (1282KB)	Act CXX of 2001	
Act_CXXXVIII_of_2007.pdf (1310KB)	Act CXXXVIII of 2007	
Regulation (EU) No 909_2014_CSDR.pdf (542KB)	Regulation (EU) No 909 2014 CSDR	
Act_XXIII_of_2003.pdf (169KB)	Act XXIII	

5

of 2003

Governance and ownership (PFMI Principle 2)

45 G03Q002

What type of legal entity is the institution?

PFMI: n/a

AGC: 3

- ☐ Public Company
- ☒ Private Company
- ☐ Central Bank (or part thereof)
- ☐ Stock Exchange (or part thereof)
- ☐ OTHER:

46 G03Q003

Is the institution operated as a "for profit" or a "not for profit" organization?"

PFMI: n/a

AGC: 4

- ☐ Not for profit
- ☒ For profit

47 G03Q004

Please provide the names of the owners and their ownership interest percentages.

PFMI: n/a

AGC: 5

Central Bank of Hungary (CBH) - 53,33% Budapest Stock Exchange (BSE) - 46,67%

48 G03Q005

What is the date of establishment of the CSD?

PFMI: n/a

AGC: 6a

12/10/1993

49 G03Q006

What is the date that the CSD's operations began?

PFMI: n/a
AGC: 6b

12/10/1993

50 G03Q007

Are participants required to contribute capital to the CSD that would result in ownership of the CSD?

PFMI: n/a
AGC: 18

- ☐ Not applicable
- ☒ No
- ☐ Yes

51 G03Q008

If yes, what fixed amount is required or what formula is used to determine the appropriate contribution level?

PFMI: n/a
AGC: 18a.

59 G03Q016

What are the roles and responsibilities of the CSD's board of directors (or equivalent), and are they clearly specified? Please provide details of the structure and composition of your Board together with their industry experience and responsibilities in governing the CSD. What are the qualifications to become a board member?

PFMI: Q.2.3.1
AGC: 7d

The Board has seven members - two of them are appointed by Central Bank of Hungary, two of them are appointed by Budapest Stock Exchange and two of them are inner members. The seventh member is independent. The roles are specified in our Articles of Association, in chapter 10.5. The qualifications needed are set in the Act CCXXXVII of 2013 on Credit Institutions and Financial Enterprises, and are the following:

The persons described in the following may not be appointed as a senior executive of a financial institution or mixed financial holding company:

a) any person who has (or had) a qualifying holding in or who is (or has been) the senior executive of such a financial institution:

aa) in the case of which insolvency can only be avoided by exceptional measures taken by the Authority, or

*ab) * which was liquidated due to its activity license being revoked, and whose personal responsibility for the development of this situation has been established by final or definitive resolution;*

*b) * any person who has seriously or systematically violated the provisions of this Act or another legislation pertaining to banking or the management of financial institutions and such has been determined by the Authority, another authority by definitive decision or a court by final ruling dated within the previous five years;*

c) any person who has a criminal record;

d) any person who is not of good business reputation.

(5) In addition to what is contained in Subsection (4), with the exception of supervisory board members, the person designated to be a senior executive of a credit institution shall satisfy the following criteria:

a) have at least three years of experience in banking or business management, or in financial or economic management in the public sector;

b) shall not act as auditor for another financial institution;

c) shall not hold another office or position which may hinder performance of his professional duties.

61 G03Q018

What are the election procedures?

PFMI: Q.2.3.2

AGC: 7e

Board members are elected at the General Meeting, the election is subject to approval by the supervisory authority, the Central Bank of Hungary, according to the Hungarian banking regulations. The Board elects its chairman - the seventh member - from among its members.

62 G03Q019

What is the maximum length of time a board member can serve?

PFMI: Q.2.3.2

AGC: 7f

Re-election is possible without limitation.

63 G03Q020

How are the voting powers distributed amongst the board members (i.e. does each board member have one vote or do certain members have additional voting power)?

PFMI: Q.2.3.2

AGC: 7g

Each board member has one vote. In case of vote-equality, the vote of the chairman would be decisive.

65 G03Q022

What are the procedures established to review the performance of the board as a whole and the performance of the individual board members? Who is responsible for regulating the board members?

PFMI: Q.2.3.4

AGC: 7h

Certain legislation, the company General Meeting, and the supervisory authority, the Central Bank of Hungary are all in a sense responsible for regulating and reviewing Board members. For the purpose of supervision of the Board the General Meeting elects the Supervisory Board.

Comprehensive risk management (PFMI Principle 3)

88 G04Q003

Any direct damages or losses to participants caused by the CSD as a result of force majeure events, acts of God, or political events, etc.?

PFMI: Q.3.1.1

AGC: 66x.

- ☐ Not applicable
- ☒ No
- ☐ Yes

89 G04Q004

If yes, please check all of the following that apply:

PFMI: Q.3.1.1

AGC: 66y.

- ☐ Financial limits are imposed on the amount of liability assumed by the CSD
- ☐ The CSD assumes liability for direct losses
- ☐ The CSD assumes liability for indirect or consequential losses
- ☐ OTHER:

90 G04Q005

In all cases where the CSD assumes responsibility for direct or indirect or consequential losses, is the CSD's liability limited by a standard of care determination?

PFMI: Q.3.1.1

AGC: 66+

- ☐ Not applicable
- ☐ No
- ☒ Yes

91 G04Q006

Please define the standard of care applied:

PFMI: Q.3.1.1

AGC: 66*

The depository shall repair direct pecuniary losses of its customers proved by proper evidence if such damages are attributable to and occurred in the operation of the depository. The depository is exempted from liability for any damages, pecuniary losses, lost profit or non-material damages that

may occur beyond its operations based upon statutory provisions and/or its General Business Rules. The depository shall be relieved of liability if it is able to prove that it has acted in a manner that can generally be expected in the given situation.

Credit risk (PFMI Principle 4)

121 G05Q011

Does the CSD have a guaranty fund independent of stock exchange or other market guarantees?

*PFMI: Q.4.3.1**AGC: 78*☒ Not applicable☐ No☐ Yes

122 G05Q012

If yes, please respond to the following questions: What is the size of the fund?

*PFMI: Q.4.3.1**AGC: 78a.*

123 G05Q013

How is the size of the fund determined?

*PFMI: Q.4.3.1**AGC: 78b.*☐ A fixed amount☐ By asset value☐ By participant volume

124 G05Q014

How is the fund financed?

*PFMI: Q.4.3.1**AGC: 78d.*☐ Funding from retained earnings☐ Contributions from participants☐ Contributions from owner

☒ Other: Not applicable

125 G05Q015

If so, what is the amount or percentage per owner?

PFMI: Q.4.3.1

AGC: 78e.

126 G05Q016

If so, what is the amount or percentage per participant?

PFMI: Q.4.3.1

AGC: 78f.

127 G05Q017

Who is covered by the fund?

PFMI: Q.4.3.1

AGC: 78h.

☐ Direct CSD participants only

☐ The beneficial owner also

☒ OTHER: Not applicable

128 G05Q018

When is the guaranty fund used?

PFMI: Q.4.3.1

AGC: 78j.

☐ When a broker defaults

☐ When a direct participant defaults

☒ OTHER: Not applicable

131 G05Q021

Does the CSD have insurance to cover losses in the event of Default on settlement commitments by the CSD or a participant?

PFMI: Q.4.3.3

AGC: 91

☐ Not applicable

- ☒ No
- ☐ Yes

132 G05Q022
What is the amount of the coverage?

PFMI: Q.4.3.3
AGC: 91a

133 G05Q023
What is the amount of the deductible?

PFMI: Q.4.3.3
AGC: 91b

134 G05Q024
Please explain other loss or default protections:

PFMI: Q.4.3.3
AGC: 79a

N/A

135 G05Q025
Does the CSD accept liability (independent of any insurance coverage) for the following: Any direct damages or losses to participants caused by the CSD in its capacity as a central counterparty?

PFMI: Q.4.3.3
AGC: 66q.

- ☐ Not applicable
- ☐ No
- ☐ Yes
- ☒ Other: KELLER CSD does not act as a central counterparty. Clearing activity is the core service of its subsidiary, KELLER CCP Ltd.

136 G05Q026
If yes, please check all of the following that apply:

PFMI: Q.4.3.3
AGC: 66r.

- ☐ Financial limits are imposed on the amount of liability assumed by the CSD

- ☐ The CSD assumes liability for direct losses
- ☐ The CSD assumes liability for indirect or consequential losses
- ☐ OTHER:

Collateral (PFMI Principle 5)

141 G06Q001

Summary narrative for PFMI Principle 5. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P5
AGC: 35c

KELER CSD does not act as a central counterparty. Clearing activity is the core service of its subsidiary, KELER CCP Ltd.

Liquidity risk (PFMI Principle 7)**Settlement finality (PFMI Principle 8)****Money settlements (PFMI Principle 9)**

217 G09Q003

Who accepts cash deposits (or makes payment credit accommodations) for CSD transactions?

PFMI: Q.9.1.1
AGC: 31

- ☒ CSD
- ☒ Central Bank
- ☐ Banks appointed by CSD
- ☐ Neither or others (e.g. credit lines used)
- ☐ Not applicable
- ☐ OTHER:

218 G09Q004

Please indicate the name of the banks appointed by the CSD

PFMI: Q.9.1.1
AGC: 31a

219 G09Q005

Who processes cash clearing (or draws on credit lines, if applicable) for CSD transactions?

PFMI: Q.9.1.1

AGC: 32

- ☐ CSD
- ☐ Central Bank
- ☐ Banks appointed by the CSD
- ☐ Neither or others (e.g. credit lines used)
- ☐ Not applicable
- ☒ OTHER: Participants need to cover their National Bank Account or CSD account to be able to settle. Credit lines are not available at CSD.

220 G09Q006

Please name banks appointed by the CSD

PFMI: Q.9.1.1

AGC: 32a

221 G09Q007

Who controls the movement of cash for cash deposits (or draws on credit lines, if applicable)?

PFMI: Q.9.1.1

AGC: 33, 33b

- ☒ CSD
- ☒ Central Bank
- ☐ Banks appointed by CSD
- ☐ Neither or others (e.g. credit lines used)
- ☐ Not applicable
- ☐ OTHER:

222 G09Q008

Please name banks appointed by the CSD

PFMI: Q.9.1.1

AGC: 33a

N/A

223 G09Q009

Who controls the movement of cash for cash clearing (or for draws on credit lines, if applicable)?

PFMI: Q.9.1.1

AGC: 34

- ☒ CSD
- ☒ Central Bank
- ☐ Banks appointed by CSD
- ☐ Neither or others (e.g. credit lines used)
- ☐ Not applicable
- ☐ OTHER:

224 G09Q010

Please name banks appointed by CSD

PFMI: Q.9.1.1

AGC: 34a

N/A

Physical deliveries (PFMI Principle 10)

239 G10Q005

How are eligible securities lodged in the CSD system?

PFMI: Q.10.1.3

AGC: 57, 57a

- ☐ A registered certificate in the name of the CSD is delivered to the CSD.
- ☐ A participant delivers the security with a valid transfer deed or stock power or other transfer document to the CSD which then effects registration.
- ☐ A registrar re-registers the security in the name of the CSD.
- ☐ Not applicable
- ☒ OTHER: Either with a blank endorsement or in registered form.

240 G10Q006

When are securities lodged into the CSD reflected in a participant's CSD account?

PFMI: Q.10.1.3

AGC: 58, 58a

- ☐ Securities are reflected in the participant's CSD account immediately upon delivery to the CSD.
- ☐ Securities are re-registered prior to being reflected in the participant CSD account.

- ☐ Not applicable
- ☒ OTHER: Same day.

241 G10Q007

How long does it usually take to lodge securities with the CSD?

PFMI: Q.10.1.3

AGC: 59, 59b

- ☐ Not applicable
- ☐ More than 4 weeks
- ☐ 2 to 4 weeks
- ☐ 3 days to 1 week
- ☒ 1 to 2 days

242 G10Q008

Please specify

PFMI: Q.10.1.3

AGC: 59a

243 G10Q009

During the process of lodging securities into the CSD, can the securities be traded?

PFMI: Q.10.1.3

AGC: 60

- ☐ Not applicable
- ☒ No
- ☐ Yes

244 G10Q010

During the process of lodging securities into the CSD, can the securities be settled?

PFMI: Q.10.1.3

AGC: 60a

- ☐ Not applicable

- ☐ No
- ☐ Yes
- ☒ Other: Physical securities can only be settled in KELER's books after the process of lodging.

245 G10Q011

During the process of lodging securities into the CSD, can the securities have ownership transferred?

PFMI: Q.10.1.3

AGC: 60b

- ☐ Not applicable
- ☒ No
- ☐ Yes

246 G10Q012

If they cannot be traded, or if you answered other, please explain

PFMI: Q.10.1.3

AGC: 60c

247 G10Q013

If they cannot be settled, or if you answered other, please explain

PFMI: Q.10.1.3

AGC: 60d

248 G10Q014

If ownership cannot be transferred, or if you answered other, please explain

PFMI: Q.10.1.3

AGC: 60e

It is a market practice in the Hungarian market that ownership can not be transferred during the process of lodging physical securities.

249 G10Q015

Are securities immediately available for delivery upon transfer to the CSD?

PFMI: Q.10.1.3

AGC: 61, 61d

- ☐ Not applicable

- ☐ No
- ☒ Yes

250 G10Q016
If no: Securities are unavailable for

PFMI: Q.10.1.3
AGC: 61a

- ☐ Not applicable
- ☐ More than 4 weeks
- ☐ 2 to 4 weeks
- ☐ 3 days to 1 week
- ☐ 1 to 2 days

251 G10Q017
If more than 4 weeks, please specify

PFMI: Q.10.1.3
AGC: 61b

252 G10Q018
If not applicable, please explain

PFMI: Q.10.1.3
AGC: 61c

253 G10Q019
What transfer process steps are involved when eligible securities are withdrawn from the CSD for safekeeping?

PFMI: Q.10.1.3
AGC: 63, 63a

- ☐ Not applicable
- ☐ Securities are transferred as is any physical delivery in the market.
- ☐ Securities are re-certificated and delivered as bearer instruments.
- ☐ Securities are re-certificated and re-registered into the name of the beneficia

- ☐ Securities are re-registered into the name of the beneficial owner or a nominee.
- ☒ Other: Physical securities can only be delivered out or destroyed, no withdrawal process is available. In case of delivery out signature check of the instruction is performed, the provision check follows, finally a debit entry is getting booked. Before physical securities are destroyed KELLER checks if the security rights are expired and the company had been deleted from the Company Register.

254 G10Q020

How long does it usually take to remove securities from the CSD?

PFMI: Q.10.1.3

AGC: 64, 64b

- ☐ Not applicable
- ☐ More than 4 weeks
- ☐ 2 to 4 weeks
- ☐ 3 days to 1 week
- ☒ 1 to 2 days

255 G10Q021

If more than 4 weeks, please specify

PFMI: Q.10.1.3

AGC: 64a

256 G10Q022

While the securities are being removed from the CSD, can they be traded? (Choose one)

PFMI: Q.10.1.3

AGC: 65a

- ☒ Yes
- ☐ Not applicable
- ☐ No

257 G10Q023

If they cannot be traded please explain

PFMI: Q.10.1.3

AGC: 65b

258 G10Q024

While the securities are being removed from the CSD, can they be settled? (Choose one)

PFMI: Q.10.1.3

AGC: 65c

- ☐ Yes
- ☐ Not applicable
- ☒ No

259 G10Q025

If they cannot be settled, please explain

PFMI: Q.10.1.3

AGC: 65d

Technically impossible.

260 G10Q026

While the securities are being removed from the CSD, can they have ownership transferred? (Choose one)

PFMI: Q.10.1.3

AGC: 65e

- ☐ Yes
- ☐ Not applicable
- ☒ No

261 G10Q027

If ownership cannot be transferred, please explain

PFMI: Q.10.1.3

AGC: 65f

Technically impossible.

263 G10Q029

What are the vault security procedures for the safekeeping of physical paper?

PFMI: Q.10.2.1

AGC: 75

- ☐ Not applicable, no vault is maintained

- ☒ Electronic keys or combinations
- ☒ Dual access control
- ☒ Visitor logs
- ☒ Vault counts
- ☒ Intrusion alarms
- ☒ Fire alarms
- ☒ Guards
- ☐ OTHER:

264 G10Q030

Please indicate frequency of vault counts:

PFMI: Q.10.2.1

AGC: 75a.

Full inventory on a yearly basis and random checks.

265 G10Q031

Please explain:

PFMI: Q.10.2.1

AGC: 75b

Central Securities Depositories (PFMI Principle 11)

271 G11Q002

CSD FUNCTIONALITY AND SERVICES, USE OF AGENTS. Certain functionalities and services reduce risk to an investor if provided in an efficient manner. The purpose of this section is to identify those functionalities that may potentially be offered by depositories and clearing systems around the world, and ascertain whether they are offered by your institution. For which of the following security types do you serve as a CSD or clearing system?

PFMI: n/a

AGC: 26

- ☒ Government securities
- ☒ Equities
- ☒ Corporate bonds
- ☐ Corporate money market
- ☐ Not applicable
- ☒ OTHER: Investment Fund Share, Venture Fund Note, Central Bank Bond, ETF, Certificate,

Compensation Note, Mortgage Bond, Convertible Bond, Futures, Options

272 G11Q003

Please name the other security types:

PFMI: n/a

AGC: 26a.

Investment Fund Share, Venture Fund Note, Central Bank Bond, ETF, Compensation Note, Mortgage Bond, Convertible Bond, Futures, Options

273 G11Q004

Is the use of the CSD in your market compulsory by law or compulsory by market practice for the settlement or safekeeping of all instrument types in your market (e.g. equities, government securities, corporate bonds, money market instruments, warrants, derivatives etc).

PFMI: n/a

AGC: 27, 27c

- ☐ Yes by law for settlement of all instrument types
- ☐ Yes by law for safekeeping of all instrument types
- ☐ Yes by market practice for settlement of all instrument types
- ☐ Yes by market practice for safekeeping of all instrument types
- ☒ Yes by law for settlement, but not for all instrument types
- ☒ Yes by law for safekeeping, but not for all instrument type
- ☐ Yes by market practice for settlement, but not for all instrument types
- ☐ Yes by market practice for safekeeping, but not for all instrument types
- ☐ Neither
- ☐ OTHER:

274 G11Q005

Please list the instrument types for which it is not compulsory by law to: (i) settle in your CSD

PFMI: n/a

AGC: 27a. (i)

Non-dematerialized securities eg. equities issued by private limited companies, OTC money market instruments, OTC warrants, OTC derivatives are not compulsory by law to settle in KELER.

275 G11Q006

(ii) safekeep in your CSD:

PFMI: n/a

AGC: 27a. (ii)

Non-dematerialized securities eg. equities issued by private limited companies, OTC money market

non-dematerialized securities (e.g. equities issued by private limited companies), OTC money market instruments, OTC warrants, OTC derivatives are not compulsory to be safekept in KELER.

276 G11Q007

Please list the instrument types for which it is not compulsory by market practice to: (i) settle in your CSD

PFMI: n/a

AGC: 27b. (i)

For non-Hungarian securities are not compulsory by market practice to settle in KELER.

277 G11Q008

(ii) safekeep in your CSD:

PFMI: n/a

AGC: 27b. (ii)

For non-Hungarian securities are not compulsory by market practice to safekeep in KELER.

278 G11Q009

Settlement and Safekeeping Percentages 28a Please list by instrument type the percentage of the total market in your jurisdiction (either volume or value) settled within your institution, exclusive of your links with third parties.

PFMI: n/a

AGC: 28 28a

100% of dematerialized securities are administered by KELER. The market is almost 100% dematerialized.

279 G11Q010

Please list by instrument type the percentage of the total market in your jurisdiction (either volume or value) held in safekeeping within your institution.

PFMI: n/a

AGC: 28b.

100% of dematerialized securities are administered by KELER. The market is almost 100% dematerialized.

281 G11Q012

In the event a participant's single or main account is blocked for any reason (e.g., insolvency, penalties, violations, liens), would securities held in any account or accounts on behalf of the participant's clients be accessible: By the participant's clients?

PFMI: Q.11.1.1

AGC: 44a

☐ Not applicable

☒ No

☐ Yes

282 G11Q013

If yes, please describe briefly how clients of participants would access their securities and whether there would be any delay in their ability to do so:

PFMI: Q.11.1.1

AGC: 44b

283 G11Q014

By the intervening authorities controlling insolvency or other proceedings?

PFMI: Q.11.1.1

AGC: 44d.

☐ Not applicable

☒ No

☐ Yes

284 G11Q015

If yes, please describe briefly under what conditions access would be granted to the intervening authorities:

PFMI: Q.11.1.1

AGC: 44e.

285 G11Q016

By the participant's creditors?

PFMI: Q.11.1.1

AGC: 44g, 44i

☐ Not applicable

☒ No

☐ Yes

286 G11Q017

If yes, please describe briefly under what conditions access would be granted to the participant's creditors:

PFMI: Q.11.1.1

AGC: 44h

287 G11Q018
By the CSD's creditors?

PFMI: Q.11.1.1
AGC: 44j.

- ☐ Not applicable
- ☒ No
- ☐ Yes

288 G11Q019
If yes, please describe briefly under what conditions access would be granted to the CSD's creditors:

PFMI: Q.11.1.1
AGC: 44k.

289 G11Q020
What is your document and record retention policy for documents and records described above in this section?

PFMI: Q.11.1.1
AGC: 47, 47a

- ☐ 7 years
- ☐ 5 years
- ☐ 3 years
- ☐ 1 year
- ☐ 6 months or less
- ☒ Other: 10 years

290 G11Q021
Does the law protect participant assets from claims and liabilities of the CSD?

PFMI: Q.11.1.1
AGC: 54

- ☐ Not applicable
- ☐ No

☒ Yes

291 G11Q022

Can the CSD assess a lien on participant accounts? (A lien would entitle the CSD to take and hold or sell the securities of the participant in payment of a debt.)

PFMI: Q.11.1.1

AGC: 55

☒ Yes

☐ No

☐ Not applicable

292 G11Q023

If yes, for what reasons are liens or similar claims imposed?

PFMI: Q.11.1.1

AGC: 55a

☒ Fees and expenses

☒ Collateralization of overdrafts

☒ To secure payment for purchased securities

☐ OTHER:

293 G11Q024

Please describe:

PFMI: Q.11.1.1

AGC: 55b

N/A

294 G11Q025

Please indicate the limits of this lien as indicated below:

PFMI: Q.11.1.1

AGC: 55c

☐ The lien may extend to settled client positions

☒ The lien is limited to securities in the course of purchase and sale transactio

☐ The lien is limited to securities in the participant's proprietary account

295 G11Q026

Please explain:

PFMI: Q.11.1.1

AGC: 55d

296 G11Q027

If a lien is placed on a participant's account which has been designated for its clients, will the CSD select certain securities to be subject to the lien?

PFMI: Q.11.1.1

AGC: 55e

☒ No

☐ Yes

297 G11Q028

If yes, please indicate whether:

PFMI: Q.11.1.1

AGC: 55f

☐ The lien is placed on the securities with the greatest value in the account

☐ The lien is placed on the most liquid securities in the account

298 G11Q029

Please explain:

PFMI: Q.11.1.1

AGC: 55g

N/A

299 G11Q030

If no, please indicate whether the entire account will be subject to the lien.

PFMI: Q.11.1.1

AGC: 55h

☐ No

☐ Yes

☒ Other: The lien will be placed to the proprietary account.

300 G11Q031

For accounts designated as client accounts, do procedures exist to restrict the placement of liens only to obligations arising from safe custody and administration of those accounts?

*PFMI: Q.11.1.1**AGC: 55j*

- ☐ No
- ☒ Yes

301 G11Q032

If yes, are the restrictions accomplished by:

*PFMI: Q.11.1.1**AGC: 55k*

- ☒ Contract between the CSD and the participant

302 G11Q033

Please explain:

*PFMI: Q.11.1.1**AGC: 55l*

N/A

303 G11Q034

Transfer of Legal Ownership. Does the CSD have legal authority to transfer title to securities?

*PFMI: Q.11.1.1**AGC: 56, 56e*

- ☐ Not applicable
- ☐ No
- ☒ Yes

304 G11Q035

When does title or entitlement to CSD securities pass between participants?

*PFMI: Q.11.1.1**AGC: 56a*

- ☒ When the transaction is processed on an intra-day basis
- ☐ When corresponding money or other consideration is transferred
- ☐ At the end of the business day on which the transfer occurs

305 G11Q036
Please describe:

PFMI: Q.11.1.1
AGC: 56b

N/A

306 G11Q037
Where does title or entitlement to CSD securities pass between participants?

PFMI: Q.11.1.1
AGC: 56c

- ☐ On the registrars books
- ☒ On the CSD books

307 G11Q038
Please describe:

PFMI: Q.11.1.1
AGC: 56d

N/A

309 G11Q040
In what form does the CSD maintain records identifying the assets of each participant?

PFMI: Q.11.1.2
AGC: 45

- ☒ Computer file
- ☐ Microfiche
- ☐ Hard copy
- ☐ Computer tape
- ☒ OTHER: CD

310 G11Q041

In which format is the source data maintained?

PFMI: Q.11.1.2

AGC: 45b

Prn file format on CD

315 G11Q046

If the securities held with the CSD are recorded by book-entry at the registrar, what are the control features at the registrar for transfer of registrar positions to and from the CSD (e.g., authentication procedures, reconciliation, confirmation of position at registrar)? Please describe:

PFMI: Q.11.1.6

AGC: 52i

N/A

318 G11Q049

How are CSD eligible securities held by the CSD?

PFMI: Q.11.3.1

AGC: 50, 50a

☒ In dematerialized form

☒ In certificated form

☐ OTHER:

320 G11Q051

If CSD eligible securities are certificated, can CSD eligible securities be held outside of the CSD?

PFMI: Q.11.3.2

AGC: 51

☐ Not applicable

☐ Certain designated securities may be held outside the CSD

☐ Once entered into the CSD, eligible securities must remain in the CSD

☐ Securities may move freely into and out of the CSD

☐ All eligible securities must be held in the CSD

☒ Other: Only physical securities can be held outside of the CSD

321 G11Q052

If certain designated securities are held outside the CSD, please indicate under which conditions these securities would be held outside the CSD:

PFMI: Q.11.3.2

AGC: 51a

322 G11Q053

If CSD eligible securities are required to be centrally immobilized at the CSD, where and with whom are the certificates safekept? (then please answer 51c)

PFMI: Q.11.3.2

AGC: 51b

323 G11Q054

Are these certificates:

PFMI: Q.11.3.2

AGC: 51c

- ☒ Bearer
- ☒ Registered
- ☐ OTHER:

324 G11Q055

If registered, how are the CSD eligible securities registered?

PFMI: Q.11.3.2

AGC: 51d

- ☐ In the name of the CSD
- ☐ In the name of the depositing participant or its nominee
- ☐ In the name of a separate nominee of the CSD
- ☒ OTHER: In the name of the participant, beneficiary owner or the end investor

325 G11Q056

If in the name of a separate nominee, please identify by name the nominee used:

PFMI: Q.11.3.2

AGC: 51f

326 G11Q057

If CSD eligible securities may be held either in or out of the CSD, are these certificates:

PFMI: Q.11.3.2

AGC: 51h

- ☐ Registered
- ☐ Bearer

327 G11Q058

What are the control features for receipt of certificates to the CSD (e.g., authentication procedures, re-registration)? Please describe:

PFMI: Q.11.3.2

AGC: 51i

328 G11Q059

If securities are dematerialized: May dematerialized security positions be re-certificated and held outside the CSD?

PFMI: Q.11.3.2

AGC: 52

- ☐ Not applicable
- ☒ No
- ☐ Yes

329 G11Q060

Are the securities held:

PFMI: Q.11.3.2

AGC: 52a, 52k

- ☒ Through book-entry at the CSD
- ☐ Through book-entry at a registrar or issuer
- ☐ OTHER:

330 G11Q061

Please identify which types of entities may act as registrars:

PFMI: Q.11.3.2

AGC: 52b

- ☐ Issuers
- ☐ Separate companies that perform registrar functions
- ☐ CSD
- ☐ OTHER:

331 G11Q062

If the securities held by the CSD are recorded by book entry at the registrar, are the securities registered only to the CSD, with the CSD providing the function of recording ownership on a centralized basis for the market?

PFMI: Q.11.3.2

AGC: 52d

- ☐ No
- ☐ Yes
- ☒ Other: In Hungary, KELER or the Issuer itself can be the registrar for securities. The market is not centralized in this aspect. However, the Issuers may choose KELER as the registrar as KELER offers this service. In this service, KELER collects beneficial owner data, forwards them towards the Issuers through a secured communication channel, calculates entitlements and distributes financial benefits for the entitled.

332 G11Q063

If yes, how are securities held at the registrar for the account of the CSD?

PFMI: Q.11.3.2

AGC: 52e

- ☐ In the name of a separate nominee of the CSD
- ☐ In the name of the CSD

333 G11Q064

Please describe:

PFMI: Q.11.3.2

AGC: 52f

N/A

334 G11Q065

If the securities held with the CSD are recorded by book-entry at the registrar but are not registered exclusively to the CSD, may they be registered to:

PFMI: Q.11.3.2

AGC: 52g

- ☐ A nominee
- ☐ The beneficial owner

335 G11Q066

Please describe:

*PFMI: Q.11.3.2**AGC: 52h*

N/A

338 G11Q069

Does the CSD accept liability (independent of any insurance coverage) for the following:
Reconciliation errors with the registrar and/or the issuer that result in direct damages or losses to participants?

*PFMI: Q.11.4.1**AGC: 66, 66a, 66d*

- ☒ Yes
- ☐ Not applicable
- ☐ No

339 G11Q070

If yes, please check all of the following that apply:

*PFMI: Q.11.4.1**AGC: 66b 66c*

- ☐ Financial limits are imposed on the amount of liability assumed by the CSD
- ☒ The CSD assumes liability for direct losses
- ☐ The CSD assumes liability for indirect or consequential losses
- ☐ OTHER:

340 G11Q071

Theft of securities (either physical certificate or electronically from accounts at the CSD) from the CSD that results in direct damages or losses to participants?

*PFMI: Q.11.4.1**AGC: 66e, 66g, 66h*

- ☐ Not applicable
- ☒ Yes
- ☐ No

341 G11Q072

If yes, please check all of the following that apply:

PFMI: Q.11.4.1

AGC: 66f

- ☐ Financial limits are imposed on the amount of liability assumed by the CSD
- ☒ The CSD assumes liability for direct losses
- ☐ The CSD assumes liability for indirect or consequential losses
- ☐ OTHER:

342 G11Q073

Failure of the CSD's systems that result in direct damages or losses to participants because they cannot use either securities or funds?

PFMI: Q.11.4.1

AGC: 66i, 66l.

- ☐ Not applicable
- ☒ Yes
- ☐ No

343 G11Q074

If yes, please check all of the following that apply:

PFMI: Q.11.4.1

AGC: 66j, 66k

- ☐ Financial limits are imposed on the amount of liability assumed by the CSD
- ☒ The CSD assumes liability for direct losses
- ☐ The CSD assumes liability for indirect or consequential losses
- ☐ OTHER:

344 G11Q075

Any direct damages or losses to participants caused by the CSD due to its errors, omissions or fraud?

PFMI: Q.11.4.1

AGC: 66m, 66p.

- ☒ Yes
- ☐ No

☐ Not applicable

☐ OTHER:

345 G11Q076

If yes, please check all of the following that apply:

PFMI: Q.11.4.1

AGC: 66n.

☐ Financial limits are imposed on the amount of liability assumed by the CSD

☒ The CSD assumes liability for direct losses

☐ The CSD assumes liability for indirect or consequential losses

☐ OTHER:

347 G11Q078

Is the CSD immune from legal action in its own jurisdiction?

PFMI: Q.11.4.2

AGC: 68

☒ No

☐ Yes

349 G11Q080

Does the CSD have Fidelity insurance (that is, insurance to cover loss of securities or money resulting, for example, from acts such as forgery, theft, fraud and/or employee dishonesty)?

PFMI: Q.11.4.3

AGC: 92

☐ Not applicable

☒ No

☐ Yes

350 G11Q081

What is the amount of the coverage?

PFMI: Q.11.4.3

AGC: 92a.

351 G11Q082

What is the amount of the deductible?

*PFMI: Q.11.4.3**AGC: 92b.*

N/A

352 G11Q083

Does the CSD have insurance for Operational Errors?

*PFMI: Q.11.4.3**AGC: 93*☐ Not applicable☐ No☒ Yes

353 G11Q084

What is the amount of the coverage?

*PFMI: Q.11.4.3**AGC: 93a.*

No answer.

354 G11Q085

What is the amount of the deductible?

*PFMI: Q.11.4.3**AGC: 93b.*

No answer.

355 G11Q086

Does the CSD have Errors and Omissions insurance?

*PFMI: Q.11.4.3**AGC: 94*☐ Not applicable☐ No☒ Yes

356 G11Q087

What is the amount of the coverage?

PFMI: Q.11.4.3

AGC: 94a.

No answer.

357 G11Q088

What is the amount of the deductible?

PFMI: Q.11.4.3

AGC: 94b.

No answer.

358 G11Q089

Does the CSD have insurance for the Premises?

PFMI: Q.11.4.3

AGC: 95

- ☐ Not applicable
- ☐ No
- ☒ Yes

359 G11Q090

What is the amount of the coverage?

PFMI: Q.11.4.3

AGC: 95a.

No answer.

360 G11Q091

What is the amount of the deductible?

PFMI: Q.11.4.3

AGC: 95b.

No answer.

361 G11Q092

Does the CSD have any other insurance?

PFMI: Q.11.4.3

AGC: 96, 96d

- ☐ Not applicable

- ☐ No
- ☒ Yes

362 G11Q093
If so, what is it for?

PFMI: Q.11.4.3
AGC: 96a.

1. Property insurance including robbery
2. Employers liability
3. Chief officers liability insurance

363 G11Q094
What is the amount of the coverage?

PFMI: Q.11.4.3
AGC: 96b.

No answer.

364 G11Q095
What is the amount of the deductible?

PFMI: Q.11.4.3
AGC: 96c.

No answer.

365 G11Q096
Who is the insurance carrier? If more than one insurance carrier, please list each carrier here and provide your responses to questions 97a and 97b in corresponding order.

PFMI: Q.11.4.3
AGC: 97

Allianz Hungaria Ins. Co.

366 G11Q097
Who is the insurance carrier's parent company, if applicable? (If inapplicable, simply type n/a.)

PFMI: Q.11.4.3
AGC: 97a.

Allianz Versicherungs AG, Germany

367 G11Q098
What is the term of the policy?

PFMI: Q.11.4.3
AGC: 97b.

No answer.

368 G11Q099
Who does the insurance cover?

PFMI: Q.11.4.3
AGC: 97c, 97d

- ☒ CSD
- ☐ Direct CSD participants
- ☐ Final investors
- ☐ Not applicable
- ☐ OTHER:

369 G11Q100

If you feel that you would like to provide additional details on any of the given answers, feel free to provide any additional comments here (maximum of 5,000 characters) or prepare an additional document identifying the question(s) you are commenting on and upload the document under 98a:

PFMI: Q.11.4.3
AGC: 98

370 G11Q101
filecount - Upload document here:

PFMI: Q.11.4.3
AGC: 98a.

0

371 G11Q102

Do the CSD's written contracts, rules, or established practices and procedures provide protection against risk of loss of participant assets by the CSD in the form of indemnification?

PFMI: Q.11.4.3
AGC: 67a, 67b.

- ☐ Yes
- ☒ No
- ☐ Not applicable
- ☐ OTHER:

372 G11Q103

Please explain (then please answer 67c):

*PFMI: Q.11.4.3**AGC: 67b.*

373 G11Q104

Please provide details of the relevant sections of the contracts, rules or practices where this information is found

*PFMI: Q.11.4.3**AGC: 67c.*

N/A

374 G11Q105

Insurance

*PFMI: Q.11.4.3**AGC: 67d.*☒ Yes☐ No☐ Not applicable☐ OTHER:

375 G11Q106

Please explain (then please answer 67f):

*PFMI: Q.11.4.3**AGC: 67e.*

Act CXX of 2001 on Capital Market

376 G11Q107

Please provide details of the relevant sections of the contracts, rules or practices where this information is found

*PFMI: Q.11.4.3**AGC: 67f.*

Para. 344, para. 336 (1) section and para. 335 points b,c,e,h,j and para. 411 of Act CXX of 2001 on Capital Market.

377 G11Q108

Acknowledgement of liability for losses caused by CSD's own actions.

PFMI: Q.11.4.3

AGC: 67g.

- ☐ Not applicable
- ☐ No
- ☒ Yes

378 G11Q109

Please explain (then please answer 67i):

PFMI: Q.11.4.3

AGC: 67h.

General Business Rules of KELER Ltd. detail rules regarding acknowledgement of liability.

379 G11Q110

Please provide details of the relevant sections of the contracts, rules or practices where this information is found.

PFMI: Q.11.4.3

AGC: 67i.

KELER General Business Rules 10.4.

380 G11Q111

Other

PFMI: Q.11.4.3

AGC: 67j.

- ☐ Yes
- ☒ No

381 G11Q112

Please explain (then please answer 67l):

PFMI: Q.11.4.3

AGC: 67k.

382 G11Q113

Please provide details of the relevant sections of the contracts, rules or practices where this information is found.

PFMI: Q.11.4.3

AGC: 67l.

N/A

384 G11Q115

Are participants permitted to maintain more than one account at the CSD?

PFMI: Q.11.5.1

AGC: 41

☐ Not applicable☐ No☒ Yes

385 G11Q116

If yes, please indicate number:

PFMI: Q.11.5.1

AGC: 41a, 41c

☒ An unlimited number of accounts☐ More than one account☐ OTHER:

386 G11Q117

If more than one account what is the maximum?

PFMI: Q.11.5.1

AGC: 41b

388 G11Q119

Are participants required/permitted to segregate assets held for their own benefit from those they hold for their clients?

PFMI: Q.11.5.2

AGC: 42

☒ Yes☐ No☐ Not applicable☐ OTHER:

389 G11Q120

If yes, is segregation required or simply permitted?

PFMI: Q.11.5.2
AGC: 42a

- ☐ Permitted
- ☒ Required

390 G11Q121
How does segregation occur?

PFMI: Q.11.5.2
AGC: 42b, 42c

- ☒ By separately designated participant accounts.
- ☒ By sub-accounts within a single participant account.
- ☐ By separately designated beneficial owner accounts.
- ☐ OTHER:

391 G11Q122
Does the CSD permit its participants to open accounts in the participant's own nominee name(s)?

PFMI: Q.11.5.2
AGC: 43, 43b

- ☐ Not applicable
- ☐ No
- ☐ Yes
- ☒ Other: Yes, it does, in the way that main accounts within KELER must be in the participant's own name, however a nominee name can be applied to any underlying subaccount.

392 G11Q123
If yes, do laws exist, which define as well as protect the rights of beneficial owners with respect to securities registered in nominee name?

PFMI: Q.11.5.2
AGC: 43a

- ☐ Yes
- ☐ No

394 G11Q126

Please indicate services you provide.

PFMI: Q.11.6.1

AGC: 35

- ☒ Own list or: AGC: Information in advance on corporate (annual or special) meetings in order that owners can vote.
- ☒ Tax assistance where foreign holders may be entitled to tax relief at source or through a claim.
- ☐ In order to avoid fails, an automatic securities lending facility - if requested - is provided for.
- ☐ Collateral handling in support of activities including securities lending, overdraft coverage, cash management, repurchase agreements, etc.
- ☒ Same day turnaround settlements.
- ☒ Information on distribution of new issues (IPO, Privatization).
- ☐ Not applicable
- ☒ OTHER: NOTE: Tax assistance applies only in case when the non-domestic custodian of foreign holder is direct client of KELER. OTHER SERVICES: see at G11Q129.

395 G11Q127

Automatic securities lending facility is provided for:

PFMI: Q.11.6.1

AGC: 35a

- ☐ Brokers
- ☐ Banks
- ☐ Other financial institutions
- ☐ OTHER:

396 G11Q128

If collateral handling, please provide details

PFMI: Q.11.6.1

AGC: 35c

397 G11Q129

Other, please explain:

PFMI: Q.11.6.1

AGC: 35d

KELER provides the following services:

- Central securities depositories services: Central securities register, ISIN code issuance, Services concerning dematerialised securities- creation and deletion and other events concerning

dematerialised securities.

-Further securities depository services: Depository matching, owner matching service.

-Clearing related and settlement services: The settlement of regulated market transactions that are not guaranteed by the central counterparty (KELER CCP), The settlement of securities transactions traded outside the regulated market, Settlement relating to the clearing activity of the central counterparty (KELER CCP), Participation in the settlement of international transactions including cross-border settlement services concerning foreign and Hungarian securities.

-Further services: Securities maintenance (account keeping), Securities account transactions, Services concerning custody managed printed (paper form) securities, Corporate action management, Paying agent activity, Share book keeping and related services, Collateral management, valuation and review, Custody management and net asset value calculation services for OBA, BEVA and the Resolution fund, Service concerning the reporting of the data transactions specified in EMIR and REMIT to the trade repository, APA/ARM disclosure and reporting mechanism defined by MiFID II, LEI Code issuance.

- Credit Institution services.

398 G11Q130

What procedures are in place for the processing of corporate action entitlements?

PFMI: Q.11.6.1

AGC: 36

☐ Credited to the securities account on the day indicated below regardless of whether actually collected by the CSD on the scheduled date.

☒ Credited to the securities account upon actual receipt by the CSD.

☒ Corporate action entitlements are handled by an entity separate from the CSD.

☐ Not applicable

☐ OTHER:

399 G11Q131

Credited to the securities account:

PFMI: Q.11.6.1

AGC: 36a

☐ On pay date.

☐ On pay date +1.

☐ On pay date +2.

☐ OTHER:

400 G11Q132

Name of entity:

PFMI: Q.11.6.1

AGC: 36c

No entity can be named, as it depends on the issuer's decision. Securities distribution is the responsibility of the issuer based on record date positions provided by KELER and payment details

provided by the investor. Paying agent is appointed by the issuer, be it KELER or other entity.

401 G11Q133

What procedures are in place for the processing of interest and dividends?

PFMI: Q.11.6.1

AGC: 37, 37d.

- ☐ Credited to the cash account on the day indicated below regardless of whether actually collected by the CSD on the scheduled date.
- ☒ Credited to the cash account upon actual receipt by the CSD.
- ☒ Income and dividend collection is handled by an entity separate from the CSD.
- ☐ Not applicable
- ☐ OTHER:

402 G11Q134

Credited to the cash account:

PFMI: Q.11.6.1

AGC: 37a

- ☐ On pay date.
- ☐ On pay date +1.
- ☐ On pay date +2.
- ☐ OTHER:

403 G11Q135

Name of entity:

PFMI: Q.11.6.1

AGC: 37c

No entity can be named, as it depends on the issuer's decision. Cash distributions are the responsibility of the issuer based on record date positions provided by KELER and payment details provided by the investor. Paying agent is appointed by the issuer. KELER provides paying agent services.

Exchange-of-value settlement systems (PFMI Principle 12)

408 G12Q003

Does the CSD guaranty settlement?

PFMI: Q.12.1.1

AGC: 66u.

- ☐ Not applicable
- ☐ Yes
- ☒ No

409 G12Q004

Please explain how this is accomplished. What are the procedures and safeguards that permit the CSD to guaranty settlement?

PFMI: Q.12.1.1

AGC: 66v.

411 G12Q006

The Committee on Payment and Settlement Systems of the Bank for International Settlements (BIS) has identified three common structural approaches or models for linking delivery and payment in a securities settlement system. Please indicate which model your procedures most closely resemble.

PFMI: Q.12.1.2

AGC: 48

- ☒ Model1
- ☐ Model2
- ☒ Model3
- ☐ Not applicable
- ☐ OTHER:

412 G12Q007

Please briefly describe your settlement process, including how do your settlement procedures vary from the model chosen above?

PFMI: Q.12.1.3

AGC: 48a

No difference from standard models. Note: Model 1 for off-exchange (OTC) settlements, Model 3 for CCP-cleared on-exchange cash market settlements.

In case of OTC settlements CSD participants' instructions require matching and settlement occurs on a gross basis, on a trade by trade basis. The delivery of the securities requires the successful transfer of funds from buyer to the seller which triggers the immediate and unrevocable transfer of the securities. (DVP principle)

In case of the CCP-cleared on-exchange trades the netted delivery and receipt settlement instructions (per ISIN) are sent by KELER CCP to KELER CSD in an already matched status. The delivery instructions should be settled first (from the participants accounts to KELER CCP) and the daily net countervalue of all trades will be debited in one sum from the clients' accounts to credit the CCP. Once the netted amounts are successfully debited KELER CCP initiates the net credit funds transfer in favour of the participants. (All security receipts per ISIN and all amounts due.)

415 G12Q010

Are the cash and security movements simultaneous?

PFMI: Q.12.1.3

AGC: 49

- ☐ Not applicable
- ☐ No
- ☒ Yes

416 G12Q011

If cash and security movements are not simultaneous, please indicate the duration of the timing gap

PFMI: Q.12.1.3

AGC: 49a

- ☐ 2 days
- ☐ Overnight
- ☐ 5 hours
- ☐ 4 hours
- ☐ 3 hours
- ☐ 2 hours
- ☐ 1 hour

Participant default rules and procedures (PFMI Principle 13)

421 G13Q004

During the past three years, has there been a situation where a participant defaulted which resulted in a significant loss?

PFMI: Q.13.1.2

AGC: 77

- ☐ Not applicable
- ☒ No
- ☐ Yes

422 G13Q005

How was the situation resolved? Or if you answered "Other," then please explain:

PFMI: Q.13.1.2
AGC: 77a

423 G13Q006

Does the stock exchange have default protections that extend to the CSD, such as the following?

PFMI: Q.13.1.2
AGC: 80

- ☐ Margin requirements for stock exchange members
- ☐ Guaranty fund for stock exchange members
- ☐ Financial requirements for stock exchange membership
- ☐ No
- ☒ Not applicable
- ☐ OTHER:

424 G13Q007

Please explain:

PFMI: Q.13.1.2
AGC: 80a

427 G13Q010

Participant Default Protections Resulting from a Participant Failure. If a participant defaults, how is the loss covered? (Choose all that apply?)

PFMI: Q.13.1.4
AGC: 76, 76d

- ☐ CSD insurance covers the loss
- ☐ The CSD guaranty fund covers the loss
- ☐ Loss is shared among participants
- ☐ Not applicable
- ☒ OTHER: The CCP within the KELER Group does have loss sharing mechanism and KELER Ltd. takes part in the CCP's default procedures as a CSD. However it does not guarantee any transactions and does not have own loss sharing mechanism.

428 G13Q011

Please explain the process:

PFMI: Q.13.1.4

AGC: 76a

429 G13Q012

Please explain the process of how the loss is shared:

PFMI: Q.13.1.4

AGC: 76b

- ☐ Limited to participants with transactions with failing counterparty
- ☐ Pro-rata based on participant's volume
- ☐ Equally, among participants

430 G13Q013

Please explain:

PFMI: Q.13.1.4

AGC: 76d

N/A

General business risk (PFMI Principle 15)

440 G14Q002

Is a financial audit performed by an Audit Firm, Regulatory Authority, or other external party?

PFMI: Q.17.2.3

AGC: 15

- ☒ Yes
- ☐ No

441 G14Q003

If yes, please state the name(s) of the entity(ies) who perform the financial audit.

PFMI: n/a

AGC: 15a.

KELER Ltd, Deloitte Auditing and Consulting Ltd.

442 G14Q004

Please list the date of your last financial audit performed by an Audit Firm, Regulatory Authority, or other external party:

PFMI: n/a

AGC: 15b.

05/05/2020

443 G14Q005

Please list the period that the audit covered:

PFMI: n/a

AGC: 15c.

Start date: 01/01/2019

End date: 31/12/2019

444 G14Q006

How frequently does the financial audit occur?

PFMI: n/a

AGC: 15d.

- ☐ Less than annually
- ☒ Annually
- ☐ Two or more times a year

445 G14Q007

If less than annually, please explain:

PFMI: n/a

AGC: 15e.

446 G14Q008

Please select the statement that most accurately characterizes the results of the last financial audit:

PFMI: n/a

AGC: 15g.

- ☐ Material exceptions found.
- ☐ Minor exceptions found.
- ☒ No material exceptions found.

447 G14Q009

If minor or material exceptions were found, what actions were taken? Please describe:

PFMI: n/a

AGC: 15h.

448 G14Q010

Has there been any material loss by the CSD during the past three years?

PFMI: n/a

AGC: 86

- ☐ Not applicable
- ☐ No
- ☐ Yes
- ☒ Other: Operational losses are strictly confidential; therefore we cannot provide these figures and related impact or actions due to confidentiality reasons.

449 G14Q011

If there has been a loss, please describe the cause, the final impact and the action taken to prevent a recurrence:

PFMI: n/a

AGC: 86a.

450 G14Q012

Has the CSD been subject to any litigation involving a participant during the past three years?

PFMI: n/a

AGC: 87

- ☐ Not applicable
- ☒ No
- ☐ Yes

451 G14Q013

Please explain the circumstances and resolution:

PFMI: n/a

AGC: 87a.

452 G14Q014

Has the CSD realized revenues sufficient to cover expenses during the past three years?

PFMI: n/a

AGC: 88, 88a

- ☐ Not applicable
- ☐ None of the last three years
- ☐ Yes for one of the last three years
- ☐ Yes for two of the last three years
- ☒ Yes for all three years

453 G14Q015

Has any participant suffered any losses in the past three years due to the CSD's performance?

PFMI: n/a

AGC: 30, 30m

- ☐ Not applicable
- ☒ No
- ☐ Yes

454 G14Q016

If yes, please select all of the following in which loss has occurred. You will be prompted to enter the number of instances and total loss in USD thereafter.

PFMI: n/a

AGC: 30a, 30j

- ☐ Corporate Action
- ☐ Settlement Process - Securities
- ☐ Settlement Process - Cash
- ☐ System Outage
- ☐ OTHER:

455 G14Q017

Corporate Action. Please specify number of instances:

PFMI: n/a

AGC: 30b.

456 G14Q018

Corporate Action. Please specify total loss in USD:

PFMI: n/a

AGC: 30c.

N/A

457 G14Q019

Settlement Process - Securities. Please specify number of instances:

PFMI: n/a

AGC: 30d.

458 G14Q020

Settlement Process - Securities. Please specify total loss in USD:

PFMI: n/a

AGC: 30e.

N/A

459 G14Q021

Settlement Process - Cash. Please specify number of instances:

PFMI: n/a

AGC: 30f.

460 G14Q022

Settlement Process - Cash. Please specify total loss in USD:

PFMI: n/a

AGC: 30g.

N/A

461 G14Q023

System Outage. Please specify number of instances:

PFMI: n/a

AGC: 30h.

462 G14Q024

System Outage. Please specify total loss in USD:

PFMI: n/a

AGC: 30i.

N/A

463 G14Q025

For Other, please specify number of instances:

PFMI: n/a
AGC: 30k.

N/A

464 G14Q026

For Other, please specify total loss in USD:

PFMI: n/a
AGC: 30l.

N/A

468 G14Q030

Does the CSD maintain a reserve for operating losses?

PFMI: Q.15.2.1
AGC: 89, 89b

- ☐ Not applicable
- ☐ No
- ☒ Yes

471 G14Q033

Please describe and indicate reserve (for operating losses) amount:

PFMI: Q.15.2.2
AGC: 89a.

Based on audited data of financial year 2017, 2018 and 2019, capital requirement for operational risk under pillar I. is approximately USD 3 million (USD/HUF exchange rate at 29 December 2019: 294,74).

Custody risk (PFMI Principle 16)

485 G15Q003

Are there any activities performed by a third party on behalf of the CSD for the CSD participants (e.g., vaulting of physical securities, registration, entitlement processing, etc.)?

PFMI: Q.16.1.1
AGC: 29, 29i

- ☒ Yes
- ☐ No
- ☐ Not applicable
- ☐ OTHER:

486 G15Q004

If third parties are employed, please indicate which services they supply:

PFMI: Q.16.1.1

AGC: 29a.

Some services in connection with custody of Hungarian physical securities and with proxy voting services provided by third parties for foreign serviced markets.

487 G15Q005

If third parties are employed, does the CSD assume liability for losses incurred by participants as a result of the actions/inactions of the third parties?

PFMI: Q.16.1.1

AGC: 29b.

☒ Yes☐ No

488 G15Q006

If you acknowledge responsibility, please indicate whether your responsibility is assumed

PFMI: Q.16.1.1

AGC: 29c, 29e.

☒ regardless of whether such loss was caused by any action or inaction of the agent☐ if such loss was caused by the agent's action or inaction and such action or inaction was deemed to be negligence on the part of the agent☐ if such loss was caused by the agent's action or inaction and such action or inaction was deemed to be gross negligence on the part of the agent☐ if the loss was caused by the willful default or other willful conduct on the part of the agent☐ OTHER:

489 G15Q007

If you acknowledge responsibility for agents, your responsibility is assumed for losses

PFMI: Q.16.1.1

AGC: 29d, 29h.

☒ without limit☒ which are not consequential losses☐ subject to a monetary limit not based on insurance limits☐ subject to a monetary limit based on insurance limits

☐ OTHER:

490 G15Q008
Please specify limit:

PFMI: Q.16.1.1
AGC: 29f.

491 G15Q009
Please specify limit:

PFMI: Q.16.1.1
AGC: 29g.

496 G15Q014

Please describe briefly the arrangements / procedures / facilities you maintain to ensure that eligible securities held at the CSD are handled at least as efficiently as compared to securities held outside the CSD, particularly in relation to income, corporate actions and proxy services.

PFMI: Q.16.3.1
AGC: 62

Annual due diligence process is carried out by KELER on the respective partners and services provided based on the CSDR requirements.

Operational risk (PFMI Principle 17)

514 G16Q011
Internal Audit. Is an internal audit undertaken in your CSD?

PFMI: Q.17.2.3
AGC: 14

☒ Yes

☐ No

515 G16Q012

If yes, what areas does the audit cover (financials, operations, etc.) and which department in your CSD handles it?

PFMI: Q.17.2.3
AGC: 14a.

The audits of internal audit department cover IT , financials, operations, security and all other functions of the depository

516 G16Q013

Please list the date of your last internal audit and the period that the audit covered:

PFMI: Q.17.2.3

AGC: 14b.

Start date: 01/09/2019

End date: 31/08/2020

Audit date: 30/09/2020

517 G16Q014

How frequently does the internal audit occur?

PFMI: Q.17.2.3

AGC: 14c.

- ☐ Less than annually
- ☐ Annually
- ☒ Two or more times a year

518 G16Q015

If less than annually, please explain:

PFMI: Q.17.2.3

AGC: 14d.

519 G16Q016

Are the results of the internal audit publicly available?

PFMI: Q.17.2.3

AGC: 14e.

- ☐ Yes
- ☒ No

520 G16Q017

Please select the statement that most accurately characterizes the results of the last internal audit:

PFMI: Q.17.2.3

AGC: 14f.

- ☐ Material exceptions found.
- ☒ Minor exceptions found.
- ☐ No material exceptions found.

521 G16Q018

If minor or material exceptions were found, what actions were taken? Please describe:

PFMI: Q.17.2.3

AGC: 14g.

Action plan was prepared containing the findings, proposed measures, responsible departments and deadlines. Fulfilment of the action plan is followed up by internal audit department.

523 G16Q020

Is an operational audit performed by an Audit Firm, Regulatory Authority, or other external party?

PFMI: Q.17.2.4

AGC: 16

☐ Yes☒ No

524 G16Q021

If yes, please state the name(s) of the entity(ies) who perform the operational audit.

PFMI: Q.17.2.4

AGC: 16a.

525 G16Q022

Please list the date of your last operational audit performed by an Audit Firm, Regulatory Authority, or other external party:

PFMI: Q.17.2.4

AGC: 16b.

526 G16Q023

Please list the period that the audit covered:

PFMI: Q.17.2.4

AGC: 16c.

Start date:

End date:

527 G16Q024

How frequently does the operational audit occur?

PFMI: Q.17.2.4

AGC: 16d.

- ☐ Less than annually
- ☐ Annually
- ☐ Two or more times a year

528 G16Q025

If less than annually, please explain:

PFMI: Q.17.2.4

AGC: 16e.

529 G16Q026

Please select the statement that most accurately characterizes the results of the last operational audit:

PFMI: Q.17.2.4

AGC: 16g.

- ☐ Material exceptions found.
- ☐ Minor exceptions found.
- ☐ No material exceptions found.

530 G16Q027

If minor or material exceptions were found, what actions were taken? Please describe:

PFMI: Q.17.2.4

AGC: 16h.

537 G16Q034

How is access to the physical building controlled?

PFMI: Q.17.5.1

AGC: 74

- ☒ By guards
- ☒ By electronic keys
- ☒ personal ID card
- ☒ By alarm system
- ☐ OTHER:

538 G16Q035

Please explain:

*PFMI: Q.17.5.1**AGC: 74a.*

N/A

541 G16Q038

Regarding data security: Are passwords used by participants to access their accounts?

*PFMI: Q.17.5.3**AGC: 71 71a.*

- ☐ Not applicable
- ☐ No
- ☒ Yes

542 G16Q039

Does each user have a unique user ID?

*PFMI: Q.17.5.3**AGC: 71c.*

- ☐ Not applicable
- ☐ No
- ☒ Yes

543 G16Q040

Are passwords regularly changed?

*PFMI: Q.17.5.3**AGC: 71e.*

- ☐ Not applicable
- ☐ No
- ☒ Yes

544 G16Q041

How often?

*PFMI: Q.17.5.3**AGC: 71f.*

KELER requires users to change their passwords every 31 days.

545 G16Q042

Is there a user lock-out after a pre-set number of unsuccessful User ID attempts?

PFMI: Q.17.5.3

AGC: 71h.

- ☐ Not applicable
- ☐ No
- ☒ Yes

546 G16Q043

How many?

PFMI: Q.17.5.3

AGC: 71i.

5

550 G16Q047

How quickly can the main system be reactivated in the event of an outage?

PFMI: Q.17.6.2

AGC: 82

- ☐ Not applicable
- ☐ Longer than 24 hours
- ☐ 8 - 24 hours
- ☐ 4 - 8 hours
- ☒ 1 - 4 hours

553 G16Q050

Will the CSD publicly announce any system interruption?

PFMI: Q.17.6.4

AGC: 84

- ☐ Not applicable
- ☐ No

☒ Yes

554 G16Q051

To whom will the CSD disclose any system interruptions?

PFMI: Q.17.6.4

AGC: 84a.

- ☒ To the CSD regulators
- ☒ To all direct participants
- ☐ To direct and indirect participants
- ☒ To the public via the internet
- ☐ In the press
- ☐ OTHER:

555 G16Q052

If so, please list webpage address:

PFMI: Q.17.6.4

AGC: 84b.

www.keler.hu

556 G16Q053

If so, please list all publications:

PFMI: Q.17.6.4

AGC: 84c.

557 G16Q054

Please explain:

PFMI: Q.17.6.4

AGC: 84d.

558 G16Q055

How will the CSD disclose any system interruptions?

PFMI: Q.17.6.4

AGC: 84e.

- ☒ By e-mail
- ☒ By telephone

- ☐ Public announcement
- ☐ Press release
- ☒ OTHER: Via KELER's proprietary communication system and its website (www.keler.hu)

559 G16Q056

Please explain:

PFMI: Q.17.6.4

AGC: 84f.

Via KELER's proprietary communication system and its website (www.keler.hu)

561 G16Q058

If a back-up system exists, how quickly can the back-up system be activated in the event of the main system failing?

PFMI: Q.17.6.5

AGC: 83

- ☐ Not applicable
- ☐ Longer than 24 hours
- ☐ 8 - 24 hours
- ☐ 4 - 8 hours
- ☒ 1 - 4 hours

565 G16Q062

BUSINESS RECOVERY PLAN. This section is intended to identify key aspects of the CSD's Business Recovery Plan (BRP), including testing requirements and past results, expected recovery time periods, and the independent review and validation (if any) of the BRP. Do you have a formal business recovery plan?

PFMI: Q.17.6.8

AGC: 81

- ☒ Yes
- ☐ No

566 G16Q063

Does your Business Recovery Plan include:

PFMI: Q.17.6.8

AGC: 81a, 81h.

- ☒ Back-up of all computer files
- ☒ Off-site data storage
- ☒ Back-up files stored and locked
- ☒ Off-site operations facility
- ☐ OTHER:

567 G16Q064

Please identify both the frequency and the last date of testing for the following third party: CSD participants/members

PFMI: Q.17.6.8

AGC: 81b.

Live BCP test is carried out yearly. Last date: 10 December 2019 live testing of contingency operation on backup location.

568 G16Q065

Please identify both the frequency and the last date of testing for the following third party: Stock exchange

PFMI: Q.17.6.8

AGC: 81c.

Live BCP test is carried out yearly. Last date: 10 December 2019 live testing of contingency operation on backup location.

569 G16Q066

Please identify both the frequency and the last date of testing for the following third party: Central bank

PFMI: Q.17.6.8

AGC: 81d.

Live BCP test is carried out yearly. Last date: 10 December 2019 live testing of contingency operation on backup location.

570 G16Q067

Please identify both the frequency and the last date of testing for the following third party: Local brokers

PFMI: Q.17.6.8

AGC: 81e.

Live BCP test is carried out yearly. Last date: 10 December 2019 live testing of contingency operation on backup location.

571 G16Q068

Please identify both the frequency and the last date of testing for the following third party: Any other third party

PFMI: Q.17.6.8

AGC: 81f.

Live BCP test is carried out yearly. Last date: 10 December 2019 live testing of contingency operation on backup location.

572 G16Q069

In the past three years, has it been necessary to activate the recovery plan in a live situation?

PFMI: Q.17.6.8

AGC: 85

- ☐ Not applicable
- ☐ No
- ☒ Yes

573 G16Q070

If yes, how much time was needed to implement the recovery plan?

PFMI: Q.17.6.8

AGC: 85a.

- ☐ Longer than 4 hours
- ☐ 2 - 4 hours
- ☐ 1 - 2 hours
- ☒ Less than 1 hour

574 G16Q071

How much time was needed to recover and restore business to normal operations?

PFMI: Q.17.6.8

AGC: 85b.

- ☐ Longer than 24 hours
- ☐ 8 - 24 hours
- ☐ 4 - 8 hours
- ☒ 1 - 4 hours

575 G16Q072

What was the impact to the market?

PFMI: Q.17.6.8

AGC: 85c, 85d.

- ☒ All securities settlements took place as scheduled on the same day with good value
- ☒ All cash settlements took place as scheduled on the same day with good value
- ☐ All securities settlements took place one business day late with good value
- ☐ All cash settlements took place one business day late with good value
- ☐ All securities settlements took place one business day late with value one day late
- ☐ All cash settlements took place one business day late with value one day late
- ☐ All securities settlements took place more than one business day late
- ☐ All cash settlements took place more than one business day late
- ☐ As a result of the system failure, all fines and penalties for late settlements were waived
- ☐ Even though there was a system failure, all fines and penalties for late settlements were still assessed
- ☐ OTHER:

576 G16Q073

If no or other, please explain

PFMI: Q.17.7.4

AGC: 40a.

578 G16Q075

Are procedures and controls (firewalls) in place to avoid systemic collapse or contamination if one of the linked entities should experience business interruptions for whatever reason?

PFMI: Q.17.7.1

AGC: 39

- ☒ Yes
- ☐ No
- ☐ Not applicable

579 G16Q076

Please explain

PFMI: Q.17.7.1

AGC: 39a

KELER prepared its formalized Business Continuity Plans (BCP) and Disaster Recovery Plans (DRP)

to ensure the continuity of business operations in case of undesirable events. Redundancy has built up in case of office area and data centers and network connections. In every year different tests are performed to verify our BCP / DRP capabilities.

583 G16Q080

Has a business interruption recovery plan been developed in the event the linkages should become inoperable for any reason?

PFMI: Q.17.7.4

AGC: 40

- ☒ Yes
- ☐ No
- ☐ Not applicable
- ☐ Other

Access and participation requirements (PFMI Principle 18)

587 G17Q003

Are prospective participants subject to an initial review and approval process regarding compliance with eligibility requirements?

PFMI: Q.18.1.1

AGC: 19

- ☐ Not applicable
- ☐ No
- ☒ Yes

591 G17Q007

What governs the relationship between the CSD and the participants?

PFMI: Q.18.2.2

AGC: 20

- ☒ Relevant law and regulation
- ☒ Standard participation contract
- ☒ Established terms and conditions of participation
- ☐ By-laws of the CSD
- ☒ Rules of the CSD

☐ Not applicable

☐ OTHER:

592 G17Q008

Please explain:

PFMI: Q.18.2.2

AGC: 20a

N/A

594 G17Q010

PARTICIPANTS AND PARTICIPATION. The purpose of this section is to understand issues relating to participation in the CSD, including eligibility requirements, conditions of participation, and supervision of participants. What types of entities are eligible to become participants and how many of each type are there currently?

PFMI: Q.18.2.3

AGC: 17, 17q

☒ Banks

☒ Brokers

☐ Individuals

☒ Foreign Institutions

☐ Not applicable

☒ OTHER: CSDR regulation listed entities.

595 G17Q011

How many Bank participants are there currently? (then please answer 17b)

PFMI: Q.18.2.3

AGC: 17a.

41

596 G17Q012

Please select the features included in the eligibility requirements for Banks.

PFMI: Q.18.2.3

AGC: 17b, 17d

☐ Financial Thresholds

☒ Regulatory Oversight

☐ Market Experience

☐ OTHER:

597 G17Q013

Please explain:

PFMI: Q.18.2.3

AGC: 17d.

N/A

598 G17Q014

How many Broker participants are there currently? (then please answer 17f)

PFMI: Q.18.2.3

AGC: 17e.

16

599 G17Q015

Please select the features included in the eligibility requirements for Brokers.

PFMI: Q.18.2.3

AGC: 17f, 17h

☐ Financial Thresholds

☒ Regulatory Oversight

☐ Market Experience

☐ OTHER:

600 G17Q016

How many Individual participants are there currently? (then please answer 17j)

PFMI: Q.18.2.3

AGC: 17i.

601 G17Q017

Please select the features included in the eligibility requirements for Individual participants.

PFMI: Q.18.2.3

AGC: 17j.

☐ Financial Thresholds

☐ Regulatory Oversight

☐ Market Experience

☒ OTHER: N/A

602 G17Q018

How many Foreign Institution participants are there currently?

PFMI: Q.18.2.3

AGC: 17m.

86

603 G17Q019

Please select the features included in the eligibility requirements for Foreign Institution participants.

PFMI: Q.18.2.3

AGC: 17n, 17p.

- ☐ Financial Thresholds
- ☒ Regulatory Oversight
- ☐ Market Experience
- ☐ OTHER:

604 G17Q020

If you have selected "Other entities" above, please explain:

PFMI: Q.18.2.3

AGC: 17q.

Others include commodities exchange service provider, investment fund manager, issuer, stock exchange, foreign organization performing clearing house activity, participant of an organized market as provided for in law, organization performing central depository activity, central counterparty, the Hungarian State, the institution managing the estate of the Hungarian State, The Central Bank of Hungary, National Deposit Insurance Fund, Investor Protection Fund, payment institution, electronic money institution.

605 G17Q021

Indicate how many "Other entities" are currently participants?

PFMI: Q.18.2.3

AGC: 17r.

205

606 G17Q022

Please select the features included in the eligibility requirements for the participants referred to above as "Other entities".

PFMI: Q.18.2.3

AGC: 17s, 17u

- ☐ Financial Thresholds

☒ Regulatory Oversight

☐ Market Experience

☐ OTHER:

609 G17Q025

Where can a description of the specific eligibility requirements for Bank participants be found?

PFMI: Q.18.2.5

AGC: 17c.

It can be found in the Capital Market Act, in the Act XXIII of 2003 on Settlement Finality in Payment and Securities Settlement Systems and in the General Business Rules of KELER.

610 G17Q026

Where can a description of the specific eligibility requirements for Broker participants be found?

PFMI: Q.18.2.5

AGC: 17g.

It can be found in the Capital Market Act, in the Act XXIII of 2003 on Settlement Finality in Payment and Securities Settlement Systems and in the General Business Rules of KELER.

611 G17Q027

Where can a description of the specific eligibility requirements for Individual participants be found?

PFMI: Q.18.2.5

AGC: 17k.

612 G17Q028

Where can a description of the specific eligibility requirements for Foreign Institution participants be found?

PFMI: Q.18.2.5

AGC: 17o.

It can be found in the Capital Market Act, in the Act XXIII of 2003 on Settlement Finality in Payment and Securities Settlement Systems and in the General Business Rules of KELER.

613 G17Q029

Where can a description of the specific eligibility requirements for participants described above as "Other entities" be found?

PFMI: Q.18.2.5

AGC: 17t.

It can be found in the Capital Market Act, in the Act XXIII of 2003 on Settlement Finality in Payment and Securities Settlement Systems and in the General Business Rules of KELER.

614 G17Q030

How does the CSD notify participants of material changes to the conditions of participation?

PFMI: Q.18.2.5

AGC: 22

- ☐ By e-mail
- ☐ By telephone
- ☐ By public announcement
- ☐ By press release
- ☐ Not applicable
- ☒ OTHER: Via the official website of the Hungarian authority for announcement purposes (www.kozzetetelek.hu) and KELER's website (www.keler.hu).

615 G17Q031

Please explain:

PFMI: Q.18.2.5

AGC: 22a.

Via the official website of the Hungarian authority for announcement purposes (www.kozzetetelek.hu) and KELER's website (www.keler.hu).

617 G17Q033

Who enforces compliance with the CSD's conditions of participation?

PFMI: Q.18.3.1

AGC: 23

- ☒ The CSD
- ☒ The exchange
- ☒ The CSD's regulator
- ☐ Not applicable
- ☒ OTHER: Central Bank of Hungary as financial supervisory authority

618 G17Q034

Please explain:

PFMI: Q.18.3.1

AGC: 23a

619 G17Q035

Does the CSD have forms of oversight management for assessing and monitoring of the following?

PFMI: Q.18.3.1
AGC: 79

- ☒ Participant eligibility requirements
- ☒ Participant volumes
- ☒ Participant financial strength
- ☐ Other loss or default protections the CSD maintains
- ☐ Collateral requirements for participants
- ☐ Debit caps for participants
- ☒ Settlement controls that minimize or eliminate the risk of default by a participant
- ☒ Blocking of securities movement before receipt of payment
- ☒ Blocking payment until securities are moved
- ☐ Not applicable
- ☐ OTHER:

620 G17Q036
Please explain other loss or default protections:

PFMI: Q.18.3.1
AGC: 79a

621 G17Q037
Please explain the requirements:

PFMI: Q.18.3.1
AGC: 79b

622 G17Q038
Please explain how these debit caps work:

PFMI: Q.18.3.1
AGC: 79c

623 G17Q039
What type or types of settlement controls

PFMI: Q.18.3.1
AGC: 79d.

- ☐ Blocking or freezing of securities positions

☐ Controlling DVP settlement

☒ Simultaneous DVP

☐ OTHER:

624 G17Q040

Please explain:

PFMI: Q.18.3.1

AGC: 79e.

625 G17Q041

Please explain:

PFMI: Q.18.3.1

AGC: 79f.

626 G17Q042

Please explain:

PFMI: Q.18.3.1

AGC: 79g.

N/A

627 G17Q043

Please identify and explain:

PFMI: Q.18.3.1

AGC: 79h

Multilaterally netted positions (Budapest Stock Exchange spot, BSE MTS and MTS Hungary trades) are settled on a DVP basis in batch processing, other DVP transactions are executed in real-time environment on a gross basis.

628 G17Q044

Please explain briefly how these work:

PFMI: Q.18.3.1

AGC: 79i

631 G17Q047

What enforcement actions are available to the enforcement authority?

PFMI: Q.18.3.3

AGC: 24

- ☒ Fines
- ☒ Restrictions on participation
- ☒ Suspension of participation
- ☒ Termination of participation
- ☐ Not applicable
- ☐ OTHER:

632 G17Q048

Please explain:

*PFMI: Q.18.3.3**AGC: 24a*

N/A

633 G17Q049

Has there been any such enforcement actions in the last three years?

*PFMI: Q.18.3.3**AGC: 25*☒ Yes☐ No

634 G17Q050

If yes, please explain, including information relative to any suspensions of CSD participants:

*PFMI: Q.18.3.3**AGC: 25a.*

It is confidential information, therefore we cannot provide any details.

Tiered participation (PFMI Principle 19)**Links (PFMI Principle 20)**

651 G19Q004

Please list all depositories or settlement systems to which you have an electronic link.

*PFMI: Q.20.1.2**AGC: 38*

KELER Ltd has electronic links to: KDPW and SIX SIS.

Efficiency and effectiveness (PFMI Principle 21)**Communication (PFMI Principle 22)**

676 G21Q003

Security Control. How do participants receive information (view actual settlement of trades, movement of securities on their accounts, etc.) and see the status of their accounts?

*PFMI: Q.22.1.1**AGC: 69*

- ☒ By direct electronic link
- ☒ By receipt of physical account holding statements
- ☐ Not applicable
- ☒ OTHER: SWIFT

677 G21Q004

Please explain:

*PFMI: Q.22.1.1**AGC: 69a.*

Via KELER's proprietary communication system and through SWIFT messages.

678 G21Q005

Do participants have access to affect their holdings, including confirming and affirming trades, movement of securities on their accounts, etc.?

*PFMI: Q.22.1.1**AGC: 70*

- ☐ Not applicable
- ☐ No
- ☒ Yes

679 G21Q006

How is access given to participants?

*PFMI: Q.22.1.1**AGC: 70a.*

- ☒ By direct electronic link
- ☒ OTHER: Paper-based instructions

680 G21Q007

Please select type of electronic link:

PFMI: Q.22.1.1

AGC: 70b.

- ☐ Dial-up modem
- ☐ Secured, leased, dedicated telephone line
- ☒ Internet
- ☐ Fax

681 G21Q008

Please explain:

PFMI: Q.22.1.1

AGC: 70c.

N/A

682 G21Q009

Does the CSD communicate with other market entities such as stock exchanges, payment systems, clearing houses, etc., by secured linkages?

PFMI: Q.22.1.1

AGC: 72

- ☐ Not applicable
- ☐ No
- ☒ Yes

683 G21Q010

Please explain:

PFMI: Q.22.1.1

AGC: 72a

1. Exchange - leased line
2. Payment system - SWIFT
3. MTS-Hungary - SWIFT

684 G21Q011

How does the CSD communicate with Stock Exchanges?

PFMI: Q.22.1.1

AGC: 73 73a

- ☐ Dial-up modem
- ☒ Secured, leased, dedicated telephone line
- ☒ Internet
- ☐ Fax
- ☐ Paper
- ☐ other
- ☐ Not applicable
- ☐ OTHER:

685 G21Q012
How does the CSD communicate with Payment Systems?

PFMI: Q.22.1.1
AGC: 73b

- ☐ Dial-up modem
- ☐ Secured, leased, dedicated telephone line
- ☐ Internet
- ☐ Fax
- ☐ Paper
- ☒ other
- ☐ Not applicable
- ☒ OTHER: Through SWIFT messages.

686 G21Q013
How does the CSD communicate with Clearing Houses?

PFMI: Q.22.1.1
AGC: 73c

- ☐ Dial-up modem
- ☐ Secured, leased, dedicated telephone line
- ☐ Internet
- ☐ Fax
- ☐ Paper
- ☒ other

☐ Not applicable

☒ OTHER: KELER CCP, the clearing house for Hungarian capital market trading venues is the subsidiary of KELER. Therefore KELER and KELER CCP has common IT infrastructure, KELER CCP's systems are communicating directly with KELER's systems.

687 G21Q014

How does the CSD communicate with Registrars?

PFMI: Q.22.1.1

AGC: 73d

☐ Dial-up modem

☒ Secured, leased, dedicated telephone line

☒ Internet

☒ Fax

☐ Paper

☐ other

☐ Not applicable

☒ OTHER: KELER may act as registrar based on the instructions of the issuer; if other player acts as registrar, KELER provides the data prepared for registrars in file or on paper

Transparency and disclosure (PFMI Principle 23)

712 G22Q020

Capital. Are annual financial statements publicly disclosed?

PFMI: Q.23.5.3

AGC: 13

☐ No

☒ Yes

713 G22Q021

If yes, the AGC requests a copy of the institution's annual report. Is the annual report available electronically?

PFMI: Q.23.5.3

AGC: 13a.

☒ Yes

☐ No

714 G22Q022

filecount - If yes, please upload the document(s) here or insert web link(s) in question 13d:

PFMI: Q.23.5.3

AGC: 13b.

0

715 G22Q023

filecount - If more than one document for 13b, please upload the additional document here:

PFMI: Q.23.5.3

AGC: 13c.

0

716 G22Q024

Please insert web link(s) for 13b here:

PFMI: Q.23.5.3

AGC: 13d.

<https://english.keler.hu/Key%20documents/Financial%20Reports/>

717 G22Q025

If no, and annual report and/or financial statements are not disclosed, please state your share capital, reserves, and retained earnings (or equivalents as determined under local accounting standards). Share Capital (then please answer 13f):

PFMI: Q.23.5.3

AGC: 13e.

718 G22Q026

Reserves (then please answer 13g):

PFMI: Q.23.5.3

AGC: 13f.

N/A

719 G22Q027

Retained Earnings:

PFMI: Q.23.5.3

AGC: 13g.

N/A

721 G22Q029

AGC members from time to time receive requests from their direct investor-clients for an informational copy of a CSD's completed questionnaire. Such requests typically lead to interactions between personnel at the CSD in question and member personnel or client personnel, or both. Those interactions take time and impose costs on both members and depositories. Do you approve of AGC members delivering a copy of your completed questionnaire to the member's direct client in response to the client's request?

PFMI: Q.23.5.4

AGC: 100

☒ Yes☐ No

722 G22Q030

Are the results of the financial audit publicly available?

PFMI: Q.23.5.4

AGC: 15f

☒ Yes☐ No

723 G22Q031

Are the results of the operational audit publicly available?

PFMI: Q.23.5.4

AGC: 16f

☐ Yes☐ No**Compliance with SEC Rule 17f-7**

726 G23Q001

Rule 17f-7, by reference to Rule 17f-4, requires that, for a CSD to be eligible to hold securities of U.S. registered investment companies (such depositories hereinafter referred to as "Eligible Securities Depositories"), the CSD must be a "system for the central handling of securities where all securities of any particular class or series of any issuer deposited within the system are treated as fungible and may be transferred or pledged by bookkeeping entry without physical delivery of the securities."

Are all securities of a particular class or series of any issuer that are deposited in your institution treated as fungible, and can they be transferred or pledged by bookkeeping entry without physical

delivery of the securities?

PFMI: n/a
AGC: 1

- ☒ Yes
- ☐ No

727 G23Q002
Please explain

PFMI: n/a
AGC: 1a

N/A

728 G23Q003

Rule 17f-7 also requires that an Eligible Securities CSD “acts as or operates a system for the central handling of securities or equivalent book-entries in the country where it is incorporated,” or “acts as or operates a transnational system for the central handling of securities or equivalent book-entries.” Does your institution:

PFMI: n/a
AGC: 2

- ☒ Act as or operate a system for the central handling of securities or equivalent book-entries in the country where it is incorporated?
- ☒ Act as or operate a transnational system for the central handling of securities or equivalent book-entries?
- ☐ Act in another capacity with respect to the handling of securities or equivalent book-entries?
- ☐ Not applicable
- ☐ OTHER:

729 G23Q004
Please explain:

PFMI: n/a
AGC: 2a.

As a participant of the T2S platform it is able to act as or operate a transnational system for the central handling of securities or equivalent book-entries since February 6, 2017.

730 G23Q005

Please specify the types of securities for which you act as or operate a system for the central handling of securities or equivalent book-entries:

PFMI: n/a
AGC: 2b.

Primarily publicly issued (dematerialized) securities and all non-publicly issued dematerialised securities.

731 G23Q006

Rule 17f-7 requires that an Eligible Securities Depository regulated by a foreign financial regulatory authority as defined under section 2(a)(50) of the Act, with section 2(a)(50) establishing that a 'foreign financial regulatory authority' means any (A) foreign securities authority, (B) other governmental body or foreign equivalent of a self-regulatory organization empowered by a foreign government to administer or enforce its laws relating to the regulation of fiduciaries, trusts, commercial lending, insurance, trading in contracts of sale of a commodity for future delivery, or other instruments traded on or subject to the rules of a contract market, board of trade or foreign equivalent, or other financial activities, or (C) membership organization a function of which is to regulate the participation of its members in activities listed above." Who regulates the activities of the CSD?

PFMI: n/a
AGC: 8

- ☒ A governmental body or regulatory organization empowered to administer or enforce laws related to securities matters.
- ☐ A governmental body or self-regulatory organization empowered to administer or enforce laws related to other financial activities.
- ☐ A membership organization which regulates the participation of its members in securities matters or other financial activities.
- ☐ OTHER:

732 G23Q007

Please explain:

PFMI: n/a
AGC: 8a.

N/A

733 G23Q008

Please provide the name of regulatory authority(ies) identified in question 8:

PFMI: n/a
AGC: 9

The Central Bank of Hungary

734 G23Q009

Rule 17f-7 requires that an Eligible Securities Depository is subject to periodic examination by regulatory authorities or independent accountants. Is the CSD subject to periodic examination by:

PFMI: n/a
AGC: 10

- ☒ Regulatory authorities?
- ☒ Independent accountants?
- ☐ OTHER:

735 G23Q010
Please explain:

PFMI: n/a
AGC: 10a

N/A

736 G23Q011
Name of Authority # 1 (please answer 11a):

PFMI: n/a
AGC: 11

The Central Bank of Hungary

737 G23Q012
What enforcement actions are available to regulatory authority # 1 for breach of applicable statute or regulatory requirements?

PFMI: n/a
AGC: 11a.

- ☒ Fines
- ☒ Restrictions on CSD activities.
- ☒ Suspension of CSD activities.
- ☒ Termination of CSD activities.
- ☐ OTHER:

738 G23Q013
Please explain:

PFMI: n/a
AGC: 11b.

N/A

739 G23Q013A
Name of Authority #2:

N/A

740 G23Q014

What enforcement actions are available to regulatory authority #2 for breach of applicable statute or regulatory requirements?

PFMI: n/a

AGC: 11c.

- ☐ Fines
- ☐ Restrictions on CSD activities.
- ☐ Suspension of CSD activities.
- ☐ Termination of CSD activities.
- ☒ OTHER: N/A

741 G23Q015

Please explain:

PFMI: n/a

AGC: 11d.

N/A

742 G23Q016

Has there been any use of such enforcement actions in the last three years?

PFMI: n/a

AGC: 12

- ☐ Yes
- ☒ No
- ☐ OTHER:

743 G23Q017

If yes, please explain:

PFMI: n/a

AGC: 12a.

744 G23Q018

Has the regulatory body with oversight responsibility for the CSD issued public notice that the CSD is not in current compliance with any capital, solvency, insurance or similar financial strength requirements imposed by such regulatory body?

PFMI: n/a

AGC: 90

- ☐ Not applicable
- ☒ No
- ☐ Yes

745 G23Q019

Please describe:

PFMI: n/a

AGC: 90a.

746 G23Q020

In the case of such a notice having been issued, has such notice been withdrawn, or, has the remedy of such noncompliance been publicly announced by the CSD?

PFMI: n/a

AGC: 90b.

- ☐ No
- ☐ Yes
- ☒ Other: N/A

747 G23Q021

If yes, please describe:

PFMI: n/a

AGC: 90c.

748 G23Q022

If no, why not?

PFMI: n/a

AGC: 90d.

749 G23Q023

Rule 17f-7 requires that an Eligible Securities Depository holds assets for the custodian that participates in the system on behalf of the Fund under safekeeping conditions no less favorable than the conditions that apply to other participants. Please confirm that assets of foreign investors held by custodians as participants in the CSD are held under safekeeping conditions no less favorable than the conditions that apply to other participants.

PFMI: n/a

AGC: 21

- ☒ Yes
- ☐ No
- ☐ Not applicable

750 G23Q024

If no, other or not applicable, please explain:

PFMI: n/a

AGC: 21a.

751 G23Q025

Please confirm the basis for the arrangements you have in place to ensure that the assets you hold for custodians receive the same level of safekeeping protection as the assets held for other categories of participants.

PFMI: n/a

AGC: 21b, 21c.

- ☐ Relevant Law and Regulation
- ☐ Standard participation contract
- ☐ Established terms and conditions of participation
- ☐ By-laws of the CSD
- ☒ Rules of the CSD
- ☐ OTHER:

752 G23Q027

For each item in Question 21b that you checked, please briefly supply references or citations to the law(s), regulation(s), or CSD rule(s), participation condition(s), or participant contract provision (s), as applicable.

PFMI: n/a

AGC: 21d

Every security and asset gets the same level of protection based on the General Business rules of KELER.

753 G23Q028

Rule 17f-7 requires that an Eligible Securities Depository provides periodic reports to its participants with respect to its safekeeping of assets, including notices of transfers to or from any participant's account. Does the CSD make available periodic safekeeping reports to participants, including notices of transfers to or from the participant's account?

PFMI: n/a
AGC: 46

- ☐ No
- ☒ Yes

754 G23Q029
If no or other, please explain

PFMI: n/a
AGC: 46a.

755 G23Q030
If yes, please indicate the scheduled frequency:

PFMI: n/a
AGC: 46b, 46c.

- ☒ Daily
- ☐ Weekly
- ☒ Monthly
- ☐ Quarterly
- ☒ Annually
- ☒ Upon request
- ☐ OTHER:

756 G23Q031
Does the CSD maintain records that identify the assets of each participant and segregate the system's own assets from the assets of participants?

PFMI: Q.11.5.2
AGC: 53, 53a

- ☒ Yes
- ☐ No
- ☐ Not applicable
- ☐ OTHER:

Relevant RSSS recommendations

Cyber Security

764 G25Q001

Does your organization have a documented cyber security policy in place?

PFMI: n/a

AGC: 101

☒ Yes☐ No

765 G25Q001A

filecount - If you answered Yes to the previous question, please provide a copy or overview

0

766 G25Q002

Please confirm that your staff receive relevant training about this policy.

PFMI: n/a

AGC: 102

☒ Yes☐ No

767 G25Q003

Please provide an overview of your policy for continuity of business in the event of a large data breach or cyber attack against your organization.

PFMI: n/a

AGC: 103

KELER has developed detailed actions plans for such situations. The action plans contain steps for identification, protection recovery; internal and external communication contacts are included as well.

768 G25Q004

In the last 12 months have there been any changes to the policy?

PFMI: n/a

AGC: 104

☒ Yes☐ No

769 G25Q005

Please advise how often you review the policy.

PFMI: n/a

AGC: 105

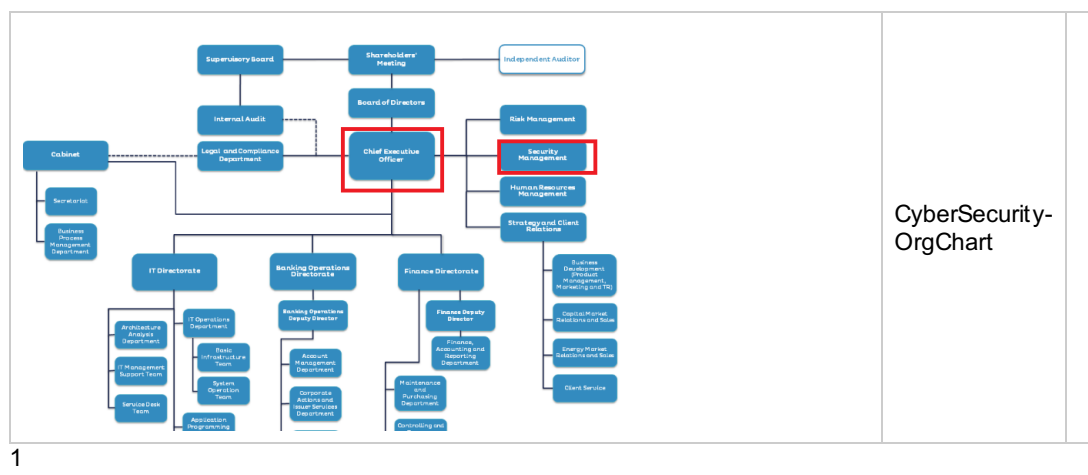
- ☒ Annually
- ☐ Semi-annually
- ☐ Other

770 G25Q006

filecount - Please provide (as an attachment) a diagram showing where your cyber security function resides and who it reports to.

PFMI: n/a

AGC: 106



1

771 G25Q007

How does your organization identify which business functions carry a cyber risk

PFMI: n/a

AGC: 107

KELER conducts cyber risk assessment yearly and ad-hoc ones as well.

772 G25Q008

Do you conduct ongoing testing and monitoring processes to ensure that all internal and external connectivity and system configurations are not at risk of cybersecurity breaches?

PFMI: n/a

AGC: 108

- ☒ Yes

☐ No

It is executed quarterly.

773 G25Q009

What technological controls and protections are in place for your systems and networks?

PFMI: n/a

AGC: 109

Intrusion Prevention / Detection System, Firewalls, Web Application Firewall, Data Leakage Prevention system, Virus and malware detection system.

774 G25Q010

Does your organization use multi-factor authentication

PFMI: n/a

AGC: 110

☒ Yes

☐ No

775 G25Q011

Where your organization has outsourced activities or functions to a third-party provider, is your cyber risk exposure documented?

PFMI: n/a

AGC: 111

☐ Yes

☒ No

Not documented yet.

776 G25Q012

What measures does your organization have to ensure early detection of a cyber attack?

PFMI: n/a

AGC: 112

Intrusion Prevention / Detection System, Web Application Firewall, Data Leakage Prevention system, Virus and malware detection system.

777 G25Q013

What is the agreed resumption time for critical operations following a cyber attack?

PFMI: n/a

AGC: 113

Based on CSDR regulation we should restore our operation in two hours. We have plans and technology to meet this requirement.

778 G25Q014

How would you advise clients of a successful cyber attack against your organization?

PFMI: n/a

AGC: 114

The clients would be informed in the channels defined in General Terms and Condition documents.

779 G25Q015

In the last 12 months has your organization been subject to a cyber attack that impacted the service you provide to us? If yes, please provide details.

PFMI: n/a

AGC: 115

☐ Yes

☒ No

780 G25Q016

Are the following elements of your cybersecurity framework tested pre and post deployment of changes?

PFMI: n/a

AGC: 116

☒ Vulnerability assessment

☒ Scenario based penetration tests

☐ Testing of incident response process and technical/business/operations (e.g. table-top exercise)

☐ OTHER:

781 G25Q017

For cloud technology and associated cyber security risks, do you have procedures and controls in place to protect our information from mishandling or theft?

In the comments section could you please explain how these procedures and controls tie back to your record retention policy?

PFMI: n/a

AGC: 117

☐ Yes

☐ No

We do not use cloud technology for client related processes and operation. We use only MS Teams for collaboration with several feature restriction including Data Leakage Prevention rules.

782 G25Q018

Does your organization conduct dark web searches for signs of a breach (internet protocol or customer/client personally identified information for sale)?

PFMI: n/a

AGC: 118

☐ Yes

☒ No

We receive warning from our parent company if they recognize relevant information.

783 G25Q019

Is your organization aware of SWIFT's Customer Security Program (CSP)?

PFMI: n/a

AGC: 119

☒ Yes

☐ No

784 G25Q020

Does your organization ensure compliance with SWIFT's CSP controls?

PFMI: n/a

AGC: 120

☒ Yes

☐ No

785 G25Q021

Does your organization respond to requests for your institution's attestations?

PFMI: n/a

AGC: 121

☒ Yes

☐ No

Generally yes, however supporting documents cannot be shared with external parties in most cases.

786 G25Q022

Does your organization request the attestation details of your counterparties and incorporate the responses into ongoing relationship and risk management programs?

PFMI: n/a

AGC: 122

☒ Yes

☐ No

We have developed a partner and client questionnaire to understand our counterparties' risks facing on different areas including cyber security. The counterparties should fill the questionnaire regularly.

Appendices