

e-Authorisation – Notification of short positions – Position holder with a separate reporting entity

Information in this document can be applied when the position holder is a company without a Finnish business ID and **reporting of net short positions is outsourced to a separate service provider** as reporting entity.

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1 Introduction

FIN-FSA introduces its electronic services platform for reporting short positions that requires strong authentication from users. To be able to report through the new platform, foreign companies must register with Digital and Population Data Services Agency's authorisation with an application service in Suomi.fi e-Authorisations portal.

In Suomi.fi e-Authorisations companies and organisations can authorise someone else to act on their behalf. When a company, e.g. foreign company without a Finnish business ID, cannot independently grant mandates in Suomi.fi e-Authorisations, the Digital and Population Data Services Agency can register the mandates on the basis of a mandate application. A mandate is an electronic power of attorney, the details of which are entered in the authorisation register. The time required for processing an application from the date on which the application is received can vary from a week to several weeks.

Simplified diagram of the process:



- To use services electronically, foreign citizens must obtain a foreigner's identifier (UID) and the Finnish Authenticator app through the <u>Finnish Authenticator</u> <u>Identification Service</u>.
- 2) The position holder and the reporting entity (both foreign companies) must apply for the mandates through <u>the authorisation with an application service</u> because there is no basic register of foreign companies from which the representation rights of a foreign company can be determined.
 - a. *Position holder* applies for the **right to grant a mandate** for its representative (*employee*)
 - b. *Reporting entity* applies for the **representative's right to grant a mandate** for its representative (*employee*)
- After both applications have been processed successfully by the with Digital and Population Data Services Agency, the representatives of the companies can grant mandates in <u>Suomi.fi e-Authorisations</u> as follows:
 - a. First, the *position holder* grants a **mandate for transactions** to the reporting entity (*company*)
 - b. Once the mandate for transactions has been granted the representative of the reporting entity can grant **a mandate to represent** to its employee who will carry out the daily reporting process for the position holder.
- The representative of the reporting entity can log in the <u>FIN-FSA's electronic</u> services platform and is able to report short positions on behalf of the position holder.



2 Mandate types

There are four mandate types for entities, two related to carrying out transactions on behalf of one's own entity and two related to mandates received from assignors.

- A person or an organisation (assignee) who has been granted a mandate for transactions may carry out transactions related to entity's (assignor) own affairs on its behalf.
- A person given a right to grant a mandate may grant mandates for transactions on behalf of an entity (assignor). If such a person needs to act on behalf of the assignor, they must also give themselves a mandate for transactions.
- Assignors may grant a mandate for transactions to an entity (assignee). Only employees who have been granted a mandate to represent can carry out transactions using the mandates for transactions granted by assignors.
- A person who has the right to grant mandates on behalf of an entity may also grant an employee a mandate, which of a type **representative's right to grant a mandate**. Such an employee may grant other employees mandates to represent the assignors and request mandates for transactions from other organisations or persons.

3 Finnish Authenticator Identification Service

The foreign citizen identification service, or the Finnish Authenticator Identification Service, allows foreigners without Finnish personal identity code to use Finnish public administration e-services that have introduced the identification using the Finnish Authenticator application. The identification using the application is intended for foreigners who need to act on behalf of the company, but do not have a Finnish personal identity code or a Finnish identification token.

The foreigner's user identifier (UID) needs to be acquired for the **persons given the right to grant a mandate** <u>before</u> applying for authorisation with an application. It is also recommended to acquire the UID for the **persons who will be granted a mandate for transactions or a mandate to represent** as early in the process as possible.

In the <u>Finnish Authenticator Identification Service</u>, a foreign citizen registers his/her foreigner's user identifier (UID) and verifies his/her identity using the Finnish Authenticator application. In connection with this first identification, the user will take a photo of oneself, as well as of his/her passport or national ID card. The identification service will confirm the person's identity if the photo and the information in the identity document match.

After registering and initiating the use of the application, foreign citizens can log into the e-service using their user ID, password and application PIN.

Detailed instructions and FAQ: Finnish Authenticator Identification Service - Suomi.fi

4 Authorisation with an application / Position holder

After the foreigner's user identifier has been acquired for at least to the person who will be given **a right to grant a mandate**, the authorisation application can be submitted. The application and related instructions are available in Suomi.fi portal: <u>Authorisation with an application - Suomi.fi</u>

Stage 1: Assignor

In the first stage of the application, you will select the type of the assignor. Select **Foreign company without a Finnish business ID**.



Stage 2: Details of the assignor

In stage 2, you are required to submit the country code, VAT number/business ID and the assignor's name. Note that the assignor's name should be the name of the company with the corresponding ID.

	Stage 2/10
Assignor	Details of the assignor
2 Details of the assignor	Enter the details of the assignor in the same format as in the register. Also make sure that you entered the identifier correctly.
Assignor status	Primarily, use the value added tax identification number (VAT number, or VAT ID). If the company does
4 Mandate type	not have a VAT number, you can use the business ID issued in the country of registration. The country code is mandatory if you are using a business ID.
Assignee	
Details of the assignee	Country code (optional)
Mandate themes	Select the country code
Authorisation specifier	VAT number or the business ID issued in
Validity	the country of registration
0) Mandate details	
	Assignor's name



Stage 3: Assignor status and signatories

Stage 3 requires you to select the signatory. Choose the suitable option. **The signatory is a person who is entitled to represent the assignor** is the most common option and is therefore used in this example.

Stages	Stage 3/10
1 Assignor	Assignor status and signatories
2 Details of the assignor	The application is signed by persons who have the right to represent the assignor on a legislative, articles of organisation rules-related, or status-related basis. If the signatory is a company or other
3 Assignor status	organisation, the application is signed by those who are entitled to represent that company or organisation.
4 Mandate type	Next, select all the information that applies to the signatories. At least one entry is required for each
5 Assignee	field.
6 Details of the assignee	Who will sign the application?
7 Mandate themes	The signatory is a person who is entitled to represent the assignor
8 Authorisation specifier	☐ The signatory is a company, association or other organisation entitled to represent the
9 Validity	assignor
10 Mandate details	Abort ← Previous Next →

Stage 4: Mandate type

In stage 4 you can select the mandate type. To select a person given the right to grant a mandate within your own organisation, select **Right to grant a mandate**.

Stages	Stage 4/10
Assignor	Mandate type
Details of the assignor	When the mandate type you select is the right to grant a mandate or the representative's right to grant a mandate, the assignee may in future administer the mandates independently in Suomi.fl e-
Assignor status	Authorizations.
Mandate type	If it is not possible to authorise anyone who could use Suomi.fi e-Authorizations, select mandate for transactions as the mandate type.
Assignee	
Details of the assignee	Mandate type
Mandate themes	Right to grant a mandate Select this when you want to grant a person a right to grant and invalidate mandates for transactions
Authorisation specifier	in Suomi.fi e-Authorizations. Note that the person with a right to grant a mandate must also grant a mandate for transactions to themselves, if they need to act on behalf of the assignor.
Validity	O Representative's right to grant a mandate
) Mandate details	Select this when you want to grant a person a right to grant and invalidate mandates to represent and request mandates for transactions in Suomi. If e-Authorizations. Note that the person with a representative's right to grant a mandate must also grant a mandate to represent to themselves if they need to act on behalf of the customer.
	 Mandate for transactions
	Select this when you want to grant a person or an organisation a right to carry out transactions on
	behalf of the assignor. For example, a company authorises an individual employee or an accounting firm to manage the company's tax affairs.
	Abot — Fravious Next ->





Stage 5: Assignee

By clicking **Next**, you can move forward to give the details of the assignee.

Stages	Stage 5/10
1 Assignor	Assignee
2 Details of the assignor	The right to grant mandates or a representative's right to grant mandates may only be granted to a person. One application can be used to grant a similar mandate to several persons.
3 Assignor status	Continue to the next step.
4 Mandate type	
5 Assignee	Abort \leftarrow Previous Next \rightarrow
6 Details of the assignee	
7 Mandate themes	
8 Authorisation specifier	
9 Validity	
10 Mandate details	

Stage 6: Details of the assignee

Here you can name the persons within your organisation who will be given the right to grant a mandate. Select **Foreigner's identifier** and enter the previously acquired UID and the first name and last name of the person and select **Add as an assignee**. Note that the right to grant a mandate can be given to several individuals. It is recommended to give the right to at least two separate persons.

Stages	Stage 6/10
1 Assignor	Details of the assignee
2 Details of the assignor	Enter the details of the assignee or assignees. Enter the first name and surname in the same format as in the register. Remember to check that you entered the personal identity code or other identifier correctly.
Assignor status	If the assignee does not have a Finnish personal identity code, enter the foreigner's identifier (UID) given
4 Mandate type	by the assignee as the identifier.
5 Assignee	Identifier type
6 Details of the assignee	 Finnish personal identity code
7 Mandate themes	Foreigner's identifier
Authorisation specifier	Personal identity code or foreigner's
9 Validity	identifier
10 Mandate details	
	First name
	Surname
	Add man assignee
	Doe John 700085290E 🖞 Remove
	Doe Jane 7000936814 🗘 Remove
	Abort ← Previous Next →



Stage 7: Mandate themes

In stage 7 you can specify the themes in which the assignee can act on behalf of the assignor. The theme for reporting net short positions is **Notification of short positions**. You can specify multiple themes if necessary. Authorisation specifier (stage 8) is not applicable for this theme.

Stares	
	Stage 7/10
1 Assignor	Mandate themes
2 Details of the assignor	Choose the matters in which the assignee can act on behalf of the assignor. You can select one or several mandate themes. Please note that a mandate can only be used in services that use Suomi.fi e-
3 Assignor status	Authorizations for acting on behalf of another party.
4 Mandate type	Restrict with a word
5 Assignee	short
6 Details of the assignee	Choose the theme category
7 Mandate themes	Financial market × -
Authorisation specifier	
9 Validity	1 mandate theme 1 selected
10 Mandate details	1 manuate uleme, 1 selected
	Notification of short positions
	FINANCIAL MARKET
	This mandate allows the assignee to notify net short positions in shares and sovereign
	debt on behalf of the assignor.
	The service channels for this mandate theme are not yet visible in Suomi.fi.
	Selected mandate themes
	Open all
	\bigodot Notification of short positions
	Enable an authorisation specifier In the next step you can add a specifier to the mandate themes for which a specifier is used.
	Abort

Stage 9: Validity

This stage allows you to enter the period of validity for the mandate. Please note that the mandate service must be renewed every 3 years regardless of your selection.

Stages	Stage 9/10
1 Assignor	Validity
2 Details of the assignor	Define the period of validity of the mandate. You can enter start and end dates in dates, or select one of the preconfigured year options.
Assignor status	
4 Mandate type	Select the start and end date
Assignee	Start date End date
6 Details of the assignee	9/6/2022 *** - 8/6/2047 *** 25 y
7 Mandate themes	
8 Authorisation specifier	Abort \leftarrow Previous Next \rightarrow
9 Validity	
10 Mandate details	



Stage 10: Mandate details

Stage 10 shows a summary of the information you are submitting. If there are errors, you can return to previous stages for corrections. If the information is correct, click **Continue**. Please note that when you continue, you can no longer change the details.



In the final stage you are required to add the following information to the application:

1. Signatories

You can add persons who will approve using strong identification only when you have identified yourself in Suomi.fi.	
Select the signing method An application can be approved using stron identity code and uses Finnish online bankl application by hand.	g identification only if the person approving has a Finnish personal ng codes, a certificate card or a mobile certificate. Others sign the
O Approval with strong identification	
Signing by hand	
Select which identification document the	signatory will need to prove their identity
○ A valid Finnish passport or an ID ca	rd issued by the police
 A valid foreign passport or an official San Marino or Switzerland 	al ID card of a member state of the European Economic Area
○ An expired Finnish passport or ID ca	ard issued by the police
 An expired foreign passport or offic Area, San Marino or Switzerland 	ial ID card of a member state of the European Economic
Date of birth	
1.1.1980	
Name	
Christopher Wallis	

Add signing method: **Signing by hand**; Identification document: **A valid foreign passport**; Date of birth and Name.



After all signatories have been added, Lock the signatories and select Next:



2. Submitting an application

Submitting an application		
You cannot submit the application electronically because you need to enclose documents that cannot be submitted electronically.		
Select the method of submitting the application		
○ I will send my application electronically		
I will send the application by post		
\bigcirc I will bring the application to a service location		
Next J Previous 1		

Select I will send the application by post and then Next.

3. Contact information

Contact information
Enter the contact information that can be used to reach the applicant in case of any issues and where information about the processed application can be sent.
Method of contacting
• Email
○ Post
Email address
john.doe@short.com
Read the instructions

Select Email, fill in the email address and then select Read the instructions.

4. Instructions

Instructions

- If the assignce does not have a Finnish personal identity code, the mandate may be granted for a maximum of three years. The period of validity is calculated from the date of commencement specified on the application. If the period of validity indicated in the application is longer, it will be changed at the registration stage.
- Print the application for signing (PDF).
 An application signed by hand and the required appendices must be submitted for processing within 6 months of printing out the
- application, Applications submitted later than this shall be rejected.
- application. Applications submitted later train this shall be rejected. Take a copy of the application for yourself before submitting the application for processing. Make sure that you submit all the required documents for processing.
- The documents proving the authority to sign may not be more than 6 months old.
 Foreign documents that prove the authority to sign are accepted only if they have been certified and they are in Finnish, Swedish or Englisi Documents in any other language must be translated by an official translator. You will find more information in the Digital and Population vedish or English
- Data Services Agency's instructions Mandate service provided by officials: Notarisation of foreign documents 🗗 Copies of foreign identity documents are accepted only if they have been certified. You will find more information in the Digital and
- Population Data Services Agency's instructions Mandate service provided by officials: Notarisation of foreign documents If you forgot to attach a document to the application or notice an error after having submitted the application for processing, wait until you receive a request for additional information and instructions for completing the application.
- · You will be notified when the mandate has been registered. If you have not completed the application according to the instructions, the processing time will be longer. If you do not provide the requested additional information by the deadline, the mandate cannot be registered, and the application will be rejected.
- · When the right to grant a mandate has been registered, the assignee can grant mandates for transactions in the selected mandate themes in Suomi, If e-Authorizations. The right to grant a mandate does not allow the assignee to use the services. The assignee must first also grant a mandate for transactions to themselves, if they need to act on behalf of a company or an organisation. Ask the assignee to read the instructions in Suomi.fi: Grant a mandate as a company or an organisation

J. Download the instructions (PDF)

Read the instructions and act accordingly.



5. Required documents

After completing the stages above, you can download the application for signing. When you submit the application for processing, make sure that all the listed documents are attached and are notarised according to the requirements listed on the website: <u>Notarisation of foreign documents | Digital and population data</u> <u>services agency (dvv.fi)</u>.

Do not submit your application until you have all of the necessary documents.

When all the documents are in order, send the application by post to:

Digital and Population Data Services Agency P.O. Box 1003 FI-00530 Helsinki FINLAND

The time required for processing an application from the date on which the application is received can vary from a week to several weeks.

5 Authorisation with an application / Reporting entity

After the foreigner's user identifier has been acquired for at least to the person who will be given **a representative's right to grant a mandate**, the authorisation application can be submitted. The application and related instructions are available in Suomi.fi portal: Authorisation with an application - Suomi.fi

Stage 1: Assignor

In the first stage of the application, you will select the type of the assignor. Select **Foreign company without a Finnish business ID**.

Stages	Stage 1/10
1 Assignor	Assignor
2 Details of the assignor	Select the assignor. The signatories and documents required for the application are determined on the basis of the assignor.
Assignor status Mandate type Assignee Details of the assignee Mandate themes Authorisation specifier Authorisation specifier	Assignor Finnish company or organisation with a business ID Association entered in the Finnish Register of Associations Foreign company or organisation with a Finnish business ID Foreign company without a Finnish business ID Person with a Finnish personal identity code Person with a Finnish personal identity code
Validity Mandate details	Person without a Hinnish personal identity code
	Please note The application can be submitted by any person chosen by the assignor. The possible delivery methods vary depending on the assignor, the signatories and the documents as well as on whether the person submitting the application can identify themselves in Suomi.fl.
	Abort Next →



Stage 2: Details of the assignor

In stage 2, you are required to submit the country code, VAT number/business ID and the assignor's name. Note that the assignor's name should be the name of the company with the corresponding ID.

5	Stage 2/10
1 Assignor	Details of the assignor
2 Details of the assignor	Enter the details of the assignor in the same format as in the register. Also make sure that you entered the identifier correctly.
3 Assignor status	Primarily, use the value added tax identification number (VAT number, or VAT ID). If the company does
4 Mandate type	not have a VAT number, you can use the business ID issued in the country of registration. The country code is mandatory if you are using a business ID.
5 Assignee	
6 Details of the assignee	Country code (optional)
Mandate themes	Select the country code
Authorisation specifier	VAT number or the business ID issued in
Validity	the country of registration
Mandate details	
	Assignor's name
	Abort 🗧 Province Next ->

Stage 3: Assignor status and signatories

Stage 3 requires you to select the signatory. Choose the suitable option. **The signatory is a person who is entitled to represent the assignor** is the most common option and is therefore used in this example.



Stage 4: Mandate type

In stage 4 you can select the mandate type. Select **Representative's right to grant a mandate**.



Stage 5: Assignee

By clicking Next, you can move forward to give the details of the assignee.

 2 Details of the assignor 3 Assignor status 4 Mandate type 5 Assignee 6 Details of the assignee 	
3 Assignor status Continue to the next step. 4 Mandate type 5 Assignee Abort ← Previous 6 Details of the assignee)
4 Mandate type 5 Assignee 6 Details of the assignee	
5 Assignee Abort ← Previous Next 6 Details of the assignee	
6 Details of the assignee	$t \rightarrow$
Image: The second se	
Authorisation specifier	
9 Validity	
1 Mandate details	

Stage 6: Details of the assignee

Here you can name the persons within your organisation who will be given the representative's right to grant a mandate. Select **Foreigner's identifier** and enter the previously acquired UID and the first name and last name of the person and select **Add as an assignee**. Note that the representative's right to grant a mandate can be given to several individuals. It is recommended to give the right to at least two separate persons.

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Stages	Stage 6/10		
1 Assignor	Details of the	assignee	
2 Details of the assignor	Enter the details of the a the register. Remember t	ssignee or assignees. Enter the to check that you entered the p	first name and surname in the same format as in ersonal identity code or other identifier correctly.
3 Assignor status	If the assignee does not	have a Finnish personal identity	code, enter the foreigner's identifier (UID) given
4 Mandate type	by the assignee as the id	entifier.	
5 Assignee	Identifier type		
6 Details of the assignee	 Finnish personal id 	dentity code	
7 Mandate themes	Foreigner's identif	ier	
Authorisation specifier	Personal identity code o	or foreigner's	
9 Validity	identifier		
1 Mandate details			
	First name		
	Surname		
	Add as an assignee		
	Doe John	700085290E	🖞 Remove
	Doe Jane	7000936814	🖞 Remove
			Abort \leftarrow Previous Next \rightarrow

Stage 7: Mandate themes

In stage 7 you can specify the themes in which the assignee can act on behalf of the assignor. The theme for reporting net short positions is **Notification of short positions**. You can specify multiple themes if necessary. Authorization specifier (stage 8) is not applicable for this theme.

tages	Stage 7/10
Assignor	Mandate themes
2 Details of the assignor	Choose the matters in which the assignee can act on behalf of the assignor. You can select one or several mandate themes. Please note that a mandate can only be used in services that use Suomi.fi e-
Assignor status	Authorizations for acting on behalf of another party.
Mandate type	Restrict with a word
Assignee	short
Details of the assignee	
Mandate themes	Choose the theme category
Authorisation specifier	Financial market
Validity	
Mandata data ila	1 mandate theme, 1 selected
y Manuale details	Close al
	Notification of short positions FINANCIAL MARKET This mandate allows the assignee to notify net short positions in shares and sovereign debt on behalf of the assignor.
	The service channels for this mandate theme are not yet visible in Suomi.fi.
	Selected mandate themes
	Open al
	✓ Notification of short positions
	Enable an authorisation specifier In the next step you can add a specifier to the mandate themes for which a specifier is used.





Stage 9: Validity

This stage allows you to enter the period of validity for the mandate. Please note that the mandate service must be renewed every 3 years regardless of your selection.

Sta	ges	Stage 9/10
1	Assignor	Validity
2	Details of the assignor	Define the period of validity of the mandate. You can enter start and end dates in dates, or select one of the preconfigured year options.
3	Assignor status	
4	Mandate type	Select the start and end date
6	Assignee	Start date End date
6	Details of the assignee	14/6/2022 11 3/6/2047 11 3/6/2047
7	Mandate themes	
8	Authorisation specifier	Abort \leftarrow Previous Next \rightarrow
9	Validity	
10	Mandate details	

Stage 10: Mandate details

Stage 10 shows a summary of the information you are submitting. If there are errors, you can return to previous stages for corrections. If the information is correct, click **Continue**. Please note that when you continue, you can no longer change the details.

Stages	Stage 10/10
1 Assignor	Mandate details
2 Details of the assignor	Check that the details of the mandates to be granted are correct. When you continue, you can no longer change the details.
3 Assignor status	
4 Mandate type	Assignor
5 Assignee	Reporting Services Inc., US123123
Details of the environment	Signatories
Details of the assignee	Who will sign the application?
7 Mandate themes	The signatory is a person who is entitled to represent the assignor
8 Authorisation specifier	Mandate type
9 Validity	Representative's right to grant a mandate
10 Mandate details	Assignees
	Doe John, 700085290E
	Doe Jane, 7000936814
	Mandate themes
	Open all
	Notification of short positions
	Period of validity
	14/6/2022 - 13/6/2047
	Abort - Previous Continue



In the final stage you are required to add the following information to the application:

1. Sig	natories
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<i>f</i> ou can add persons who will approve using strong identification only when you have identified yourself in Suomi.fi.				
Select the signing metho An application can be app identity code and uses Fir application by hand.	d oroved using strong identification only if the person approving has a Finnish personal nish online banking codes, a certificate card or a mobile certificate. Others sign the			
O Approval with stron	ng identification			
Signing by hand				
Select which identification	on document the signatory will need to prove their identity			
○ A valid Finnish pass	sport or an ID card issued by the police			
 A valid foreign pass San Marino or Switt 	port or an official ID card of a member state of the European Economic Area zerland			
O An expired Finnish	passport or ID card issued by the police			
 An expired foreign Area, San Marino or 	passport or official ID card of a member state of the European Economic r Switzerland			
Date of birth				
1.1.1980				
Name				
Christopher Wallis				
<u>.</u>				

Add signing method: **Signing by hand**; Identification document: **A valid foreign passport**; Date of birth and Name.

After all signatories have been added, Lock the signatories and select Next:

unlock and change signatories, all of them must sign or approve the application again.
CC Lock the signatories

2. Submitting an application

Submitting an application
You cannot submit the application electronically because you need to enclose documents that cannot be submitted electronically.
Select the method of submitting the application
○ I will send my application electronically
I will send the application by post
○ I will bring the application to a service location
Next ↓ Previous ↑

Select I will send the application by post and then Next.

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3. Contact information

Contact information
Enter the contact information that can be used to reach the applicant in case of any issues and where information about the processed application can be sent.
Method of contacting
 Email
○ Post
Email address
john.doe@repservice.com
Read the instructions Previous 1

Select Email, fill in the email address and then select Read the instructions.

4. Instructions

Instructions

- If the assignee does not have a Finnish personal identity code, the mandate may be granted for a maximum of three years. The period of validity is calculated from the date of commencement specified on the application. If the period of validity indicated in the application is longer, it will be changed at the registration stage.
- Print the application for signing (PDF).
- An application signed by hand and the required appendices must be submitted for processing within 6 months of printing out the application. Applications submitted later than this shall be rejected.
- Take a copy of the application for yourself before submitting the application for processing.
- Make sure that you submit all the required documents for processing.
- The documents proving the authority to sign may not be more than 6 months old.
- Foreign documents that prove the authority to sign are accepted only if they have been certified and they are in Finnish, Swedish or English.
 Documents in any other language must be translated by an official translator. You will find more information in the Digital and Population
 Data Services Agency's instructions Mandate service provided by officials: Notarisation of foreign documents I³
- Copies of foreign identity documents are accepted only if they have been certified. You will find more information in the Digital and
- Population Data Services Agency's instructions Mandate service provided by officials: Notarisation of foreign documents [2]. • If you forgot to attach a document to the application or notice an error after having submitted the application for processing, wait until you
- If you forgot to attach a document to the application or notice an error after naving submitted the application for processing, wait until you
 receive a request for additional information and instructions for completing the application.
- You will be notified when the mandate has been registered. If you have not completed the application according to the instructions, the
 processing time will be longer. If you do not provide the requested additional information by the deadline, the mandate cannot be
 registered, and the application will be rejected.
- When the representative's right to grant a mandate has been registered, the assignee can grant mandates to represent in the selected
 mandate themes in Suomi.fi e-Authorizations. The representative's right to grant a mandate does not allow the assignee to act on behalf of
 customers. The assignee must first also grant a mandate to represent to themselves, if they need to act on behalf of a company or
 organisation. Ask the assignee to read the instructions in Suomi.fi: Grant a mandate as a company or an organisation.

➡ Download the instructions (PDF)

Read the instructions and act accordingly.

5. Required documents

After completing the stages above, you can download the application for signing. When you submit the application for processing, make sure that all the listed documents are attached and are notarised according to the requirements listed on the website: <u>Notarisation of foreign documents | Digital and population data</u> <u>services agency (dvv.fi)</u>.

Do not submit your application until you have all of the necessary documents.

When all the documents are in order, send the application by post to:

Digital and Population Data Services Agency P.O. Box 1003 FI-00530 Helsinki FINLAND



The time required for processing an application from the date on which the application is received can vary from a week to several weeks.

6 Suomi.fi e-Authorisations

After the applications referred to in the previous stages are successfully processed (i.e. a confirmation has been received from Digital and Population Data Services Agency) for **both** the position holder and the reporting entity, the assignees of the companies are able grant mandates in <u>Suomi.fi e-Authorisations</u> in the following order:

- 1. The assignee of the position holder grants **a mandate for transactions** to the reporting entity (*company*)
- 2. The assignee of the reporting entity grants **a mandate to represent** to its employee who will carry out the daily reporting process for the position holder.

Please note that the persons who will be granted the mandate to represent must have acquired the foreigner's user identifier (UID) beforehand (see page 2 for instructions).

If the assignees of the reporting entity themselves need to act on behalf of the position holder (i.e. carry out daily reporting), they must grant themselves a mandate to represent. The representative's right to grant a mandate does not allow the assignee to use the services.

More information is available on Suomi.fi website: <u>Grant a mandate as a company or</u> <u>an organisation - Suomi.fi</u> and below you will find a step-by-step guide.

6.1 Position holder grants a mandate for transactions to the reporting entity

The assignee of the position holder logs in to the Suomi.fi portal (<u>https://suomi.fi</u>) with the previously created foreigner's user identifier (UID). To log in, click on the **Identification** button at the top right of the site.



At the bottom of the view that opens, select Identification methods for foreigners.



When selecting the identification method for foreigners, always choose the option Finnish Authenticator App even if your country's identification means are available. = e-Identification



N-FSA ICIAL SUPERVISORY AUTHORITY 14 December 2023

After successfully logging in, select e-Authorisations on the front page.



On the e-Authorisations page, select Company's mandates.



Select the company you want to act on behalf of and continue to the e-service.



On the Company's mandates page you can view, grant and request mandates. Select Grant mandates in the upper left corner of the page.

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XPIRED MANDATES						

Step 1: Mandate type

In the first step you can select the mandate type you wish to grant. Select the option Mandate for transactions.





Step 2: Parties

In the second step you will determine the reporting entity who will be granted the mandate. Select **Add a company**.



Select **Add foreign companies or organisations**, select Country code and enter the VAT or business ID of the reporting entity and click **Add**. Please note that you must use the ID the reporting entity has given in its authorisation application. The application of the reporting entity must be successfully processed by the Digital and Population Data Services Agency in order to continue with the process.

E Suomi.fi	Search in Suomi.fi	Q In Eng	lish (EN) 🗸	Mohammed Goodwin LOG OUT	
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			Abort	← Previous Next →	



Step 3: Mandate themes

In the third step you will choose the mandate themes for which you will grant mandates. For reporting net short positions to FIN-FSA, the correct theme is **Notification of short positions**. The simplest way to find the correct theme is to use the search function.

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	Select all 1 Close all Select all 1 Close all Selected mandate allows the assignee to notify net short positions in shares and sovereign debt on behalf of the assignor. Selected mandate themes (1) In the next step, you can see the mandate themes that you have selected.
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Step 4: Selected mandate themes



FIN-FSA In In FINANCIAL SUPERVISORY AUTHORITY 14

14 December 2023

Step 5: Validity

In the fifth step you can define the validity period for the chosen mandate. Please note that regardless of your selection the mandate will expire in three (3) years from the current date.

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Instructions for e-Authorizations \square^{3}					Abort	← Previous Next -	÷

Step 6: Summary and validation

In the sixth step you are required to check that all the information regarding the mandate you are about to grant is correct. After checking, click **Validate** on the bottom right.

After successfully granting a mandate, it will be shown on the Company's mandates page under the **Granted mandates** menu.

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= e-Identification

6.2 Reporting entity grants a mandate to represent to its employee

The assignee of the reporting entity logs in to the Suomi.fi portal (<u>https://suomi.fi</u>) with the previously created foreigner's user identifier (UID). To log in, click on the **Identification** button at the top right of the site.

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Suomi.fi services		showmore ~	

At the bottom of the view that opens, select **Identification methods for foreigners**.





When selecting the identification method for foreigners, always choose the option **Finnish Authenticator App** even if your country's identification means are available.

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	Estonia	Spain	Belgium	Luxembourg
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	Croatia	Czech Republic	Slovakia	Portugal
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After successfully logging in, select e-Authorisations on the front page.



On the e-Authorisations page, select Company's mandates.



Select the company (*reporting entity*) you want to act on behalf of and continue to the e-service.



On the Company's mandates page you can view, grant and request mandates.

Select Received mandates and make sure the name of the position holder is shown as an assignor (i.e. it has granted a mandate).



Select Grant mandates in the upper left corner of the page. Katherine Perry

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Step 1: Mandate type

In the first step you can select the mandate type you wish to grant. Select the option **Mandate to represent.**



Step 2: Parties

In the second step you will determine the persons who will be granted the mandate. Select **Add foreign persons**, enter the previously acquired UID and click **Add**. You can add multiple employees, if necessary.





Step 3: Mandate themes

In the third step you will choose the mandate themes for which you will grant mandates. For reporting net short positions to FIN-FSA, the correct theme is **Notification of short positions**. The simplest way to find the correct theme is to use the search function.

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	This mandate allows the assignee to notify net short positions in shares and					
	sovereign debt on behalf of the assignor.					
	Selected mandate themes (1)					
	In the next step, you can see the mandate themes that you have selected.					

Step 4: Selected mandate themes







Step 5: Validity

In the fifth step you can define the validity period for the chosen mandate. Please note that regardless of your selection the mandate will expire in three (3) years from the current date.

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Step 6: Summary and validation

In the sixth step you are required to check that all the information regarding the mandate you are about to grant is correct. After checking, click **Validate** on the bottom right.

After successfully granting a mandate, it will be shown on the Company's mandates page under the **Granted mandates** menu.

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88 REQUEST MANDATES				Download all as a file (CSV)
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7 Contact details

Digital and Population Data Services Agency

<u>Customer service for organisations</u> helps companies and organisations in the use of Suomi.fi services.

- Email: organisaatiopalvelut@dvv.fi
- Telephone: +358 295 53 5115

Instructions and support: Information on e-Authorisations - Suomi.fi

- Grant a mandate as a company or an organisation Suomi.fi
- Acting on behalf of a company or an organisation Suomi.fi

Financial Supervisory Authority

- <u>shortselling@fiva.fi</u>

8 Logging in the FIN-FSA's electronic services

After you have completed the previous stages, you will be able to log in the FIN-FSA's electronic services. Step-by-step reporting instructions are available on FIN-FSA's website: <u>Notification of short positions – Sending notifications via the</u> <u>eServices platform (finanssivalvonta.fi)</u>