

Notification of transactions via eMT

User guide for listed companies

Table of Contents

1. Introduction.....	2
2. Accessing eMT- FiMiS.....	3
2.1. Secure access with certificate and activation code.....	3
2.2. Personal certificate.....	3
2.3. Electronic Identity Card (eID).....	4
3. Logging in to eMT - FiMiS with a certificate.....	5
3.1. Launching the eMT application.....	5
3.2. Selecting the certificate.....	6
3.3. Entering the PIN code.....	6
3.4. Home page of the FiMiS portal.....	6
3.5. The log on page.....	8
3.6. Subsequent access to eMT – FiMiS.....	9
4. Using eMT- FiMiS.....	9
5. Submitting a new survey.....	10
5.1. Submitting a new survey.....	10
5.2. PDMR/PCA section.....	13
5.3. Transaction section.....	14
6. Following up on a survey submitted by a PDMR/PCA.....	15
7. Submitting the survey.....	18
8. Further steps.....	18

Having technical problems with the eMT - FiMiS application?
Contact the FSMA service desk via +32 2 220 53 88 or servicedesk@fsma.be

Questions about access to eMT – FiMiS?
Contact the secretariat of the Market Surveillance service via +32 2 220 58 57 –
Dimitri.Everaert@fsma.be or +32 2 220 59 04 – Sumitra.DellAgostino@fsma.be

Do you have substantive questions about notifying transactions?
Contact the Market Surveillance service +32 2 220 59 00 or info.fin@fsma.be

(§)

1. Introduction

Persons discharging managerial responsibilities (PDMRs)¹ and persons closely associated with them (PCAs)² must notify the issuer in question and the FSMA of transactions conducted on their account relating to shares or debt instruments of that issuer or to derivatives or other financial instruments linked thereto. A notification must be made within 3 working days of the transaction date.

The FSMA has developed the eMT (“electronic managers’ transactions”) application, which makes it possible to notify transactions online.

Declarers can create their own account or mandate someone else to notify their transactions, but legally they remain responsible at all times for compliance with their notification obligation and for the content of the notification.

The eMT application requires issuers to confirm the notified transactions and then notify them to the FSMA. Issuers are also expected to take reasonable measures to verify the origin of the notifications as well as, where applicable, to check that agents have been duly authorized to notify transactions on behalf of the PDMRs/PCAs.

After a transaction notification has been confirmed by the issuer, the FSMA will publish it on its website ([Managers’ transactions | FSMA](#)).

The eMT application for reporting managers’ transactions is part of FiMIS, the secure online platform, and is available via the following link: <https://portal-fimis.fsma.be/en>.

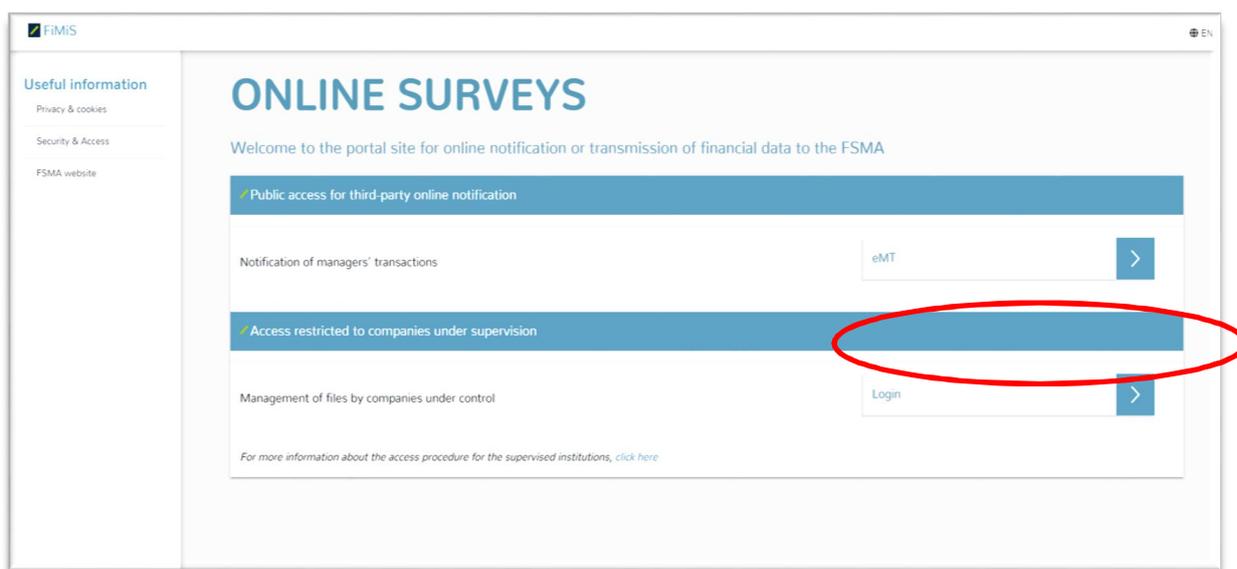


Figure 1: start page for online surveys in FiMIS

¹ The abbreviation is for “Person discharging managerial responsibilities”.

² The abbreviation is for “Person closely associated”.

2. Accessing eMT- FiMiS

The eMT application for the transactions of managers and persons closely associated with them is part of the secure FiMiS environment and has two different access points, depending on the type of user.

- PDMRs/PCAs can set up a user account with their email address and password (see the manual for PDMRs/PCAs on the FSMA website);
- Persons acting on behalf of a listed company have to use a more secure access with a certificate and activation code.

2.1. Secure access with certificate and activation code

For access by listed companies, a secure environment was chosen with a certificate and activation code, as described below. It is strongly recommended to ensure that for each listed company, several people have access to eMT, so that transactions can always be notified in good time (including in cases where someone is absent).

If a listed company wishes to designate a new person to access eMT, it can contact the secretariat of the Market Surveillance service via Dimitri.Everaert@fsma.be (+32 2 220 58 57) or Sumitra.DellAgostino@fsma.be (+32 2 220 59 04). Each new user will then receive an activation code from the FSMA, after which the user can go through the following steps.

Those who already have access to eMT can skip the following steps and go straight to point 3.

2.2. Personal certificate

In order to access eMT- FiMiS, each user must have a personal certificate that is issued by a recognized third party.

The following certificates are eligible:

- A Belgian electronic identity card (Belgium eID) (see <http://eid.belgium.be> for more information);
- A GlobalSign PersonalSign 3 Pro-certificate (see the [Dutch](#) or the [French](#) sites for more information);
- An Isabel 6 smartcard (see <https://www.isabel.eu/en/multibanking/egovernment.html> for more information).

Each certificate must be installed on the PC that will be used for FiMiS, in accordance with the instructions of the provider. For further information, please contact the above-mentioned website of the supplier of the chosen certificate.

Each certificate is personal, which means that multiple certificates are needed if several people within an organization are involved with managing FiMiS.

2.3. Electronic Identity Card (eID)

Purchase, installation and connection of the eID reader

In order to use the eID, an eID reader is required. This can be found in computer stores and is sold with software which must be installed prior to using the card reader.

Once that is done, you can connect the card reader to a USB port and wait until the reader is recognized and available.

Creating the eID certificate

You must now create a certificate with your eID.

Insert your eID into the reader. Click on 'Yes' on the following screen:

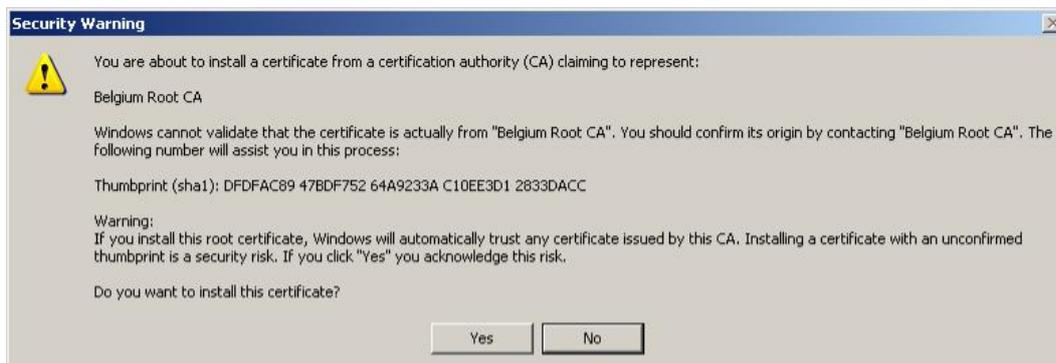


Figure 2: creating a certificate

You will now see the following message. Click on 'OK'.



Figure 3: eID pop-up

Your certificate is now registered. You may remove your card from the reader.

3. Logging in to eMT - FiMiS with a certificate

3.1. Launching the eMT application

You can launch the application via the following link: <https://portal-fimis.fsma.be/>, where you need to click on "eMT".

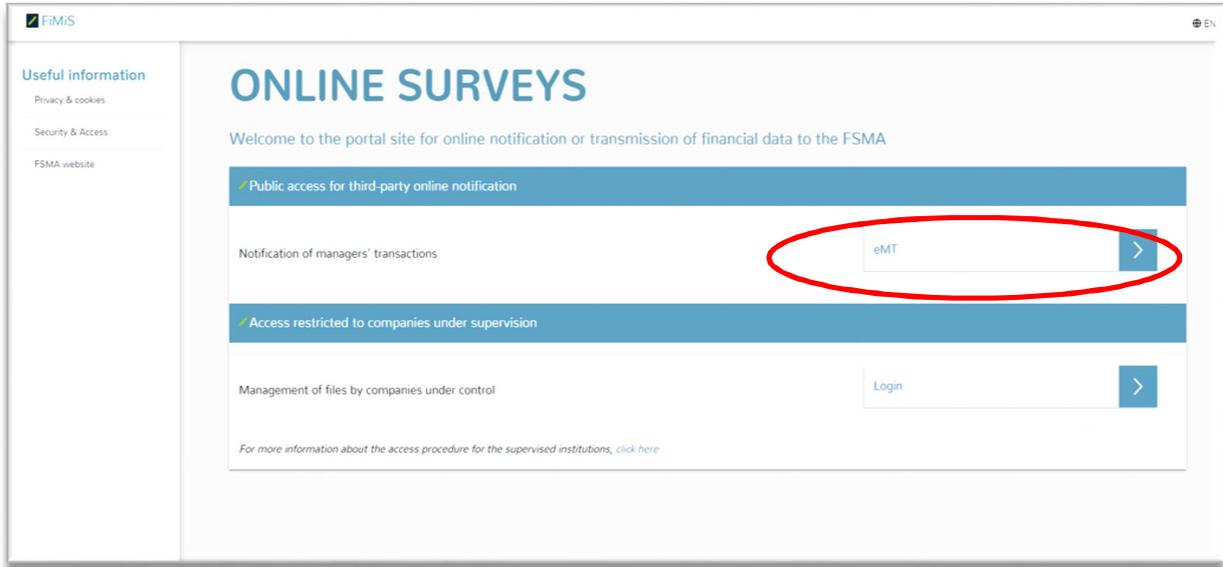
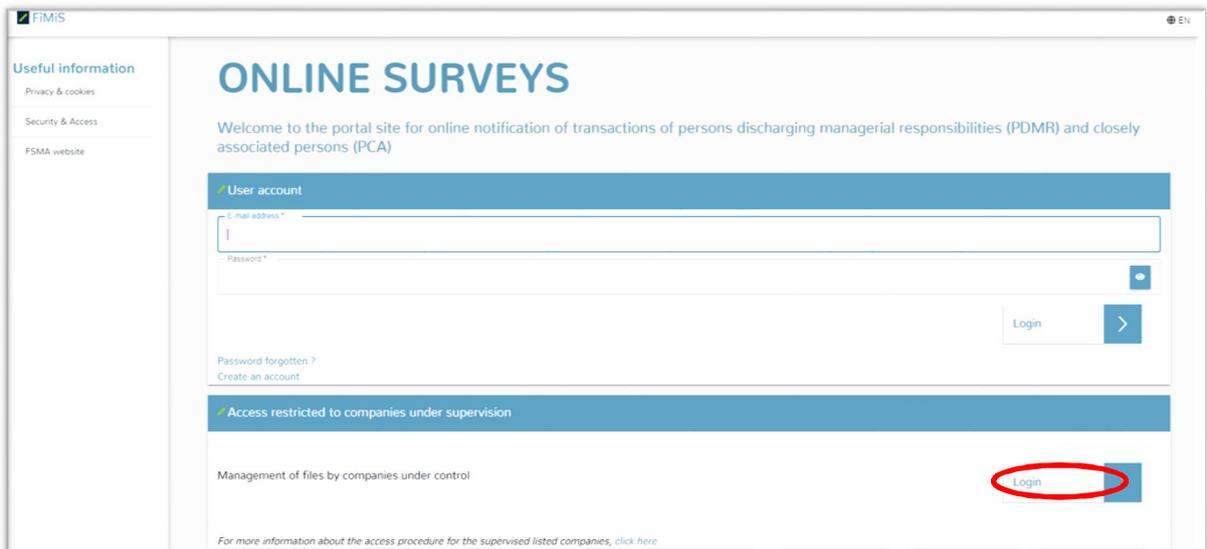


Figure 4: start page for online surveys in FiMiS

The user will see the following screen and has to click on 'Login' under 'Listed Company' to gain secure access with a certificate for listed companies.



3.2. Selecting the certificate

If you have multiple certificates, you will be asked to select a certificate. Select the correct certificate and click on 'OK'. When using a Belgian eID, select the certificate 'Citizen CA'.

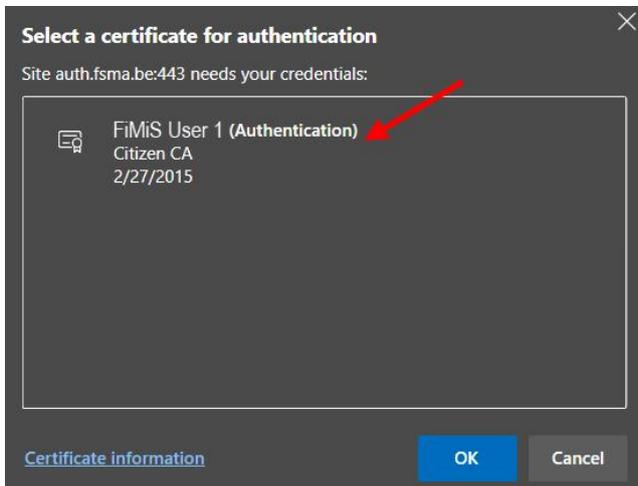


Figure 5: select certificate

3.3. Entering the PIN code

This step applies only to the use of a Belgian eID card (for other certificates, see point 2.2). Enter the PIN code of your identity card and click on 'OK'.

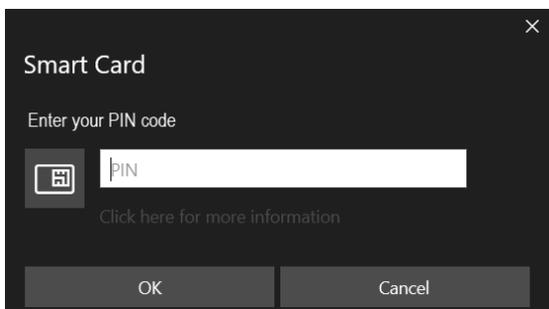


Figure 6: entering the PIN code

3.4. Home page of the FiMiS portal

You are now identified as a user with a valid certificate. You may now remove your eID from the reader. You will now see a page where you can choose your language. If this page does not appear, something has gone wrong with the certificate. In that case, you are advised to contact the FSMA service desk (tel. +32 2 220 53 88 or by email: fimis@fsma.be). If you contact the service desk by email, please add a screenshot of the error message.

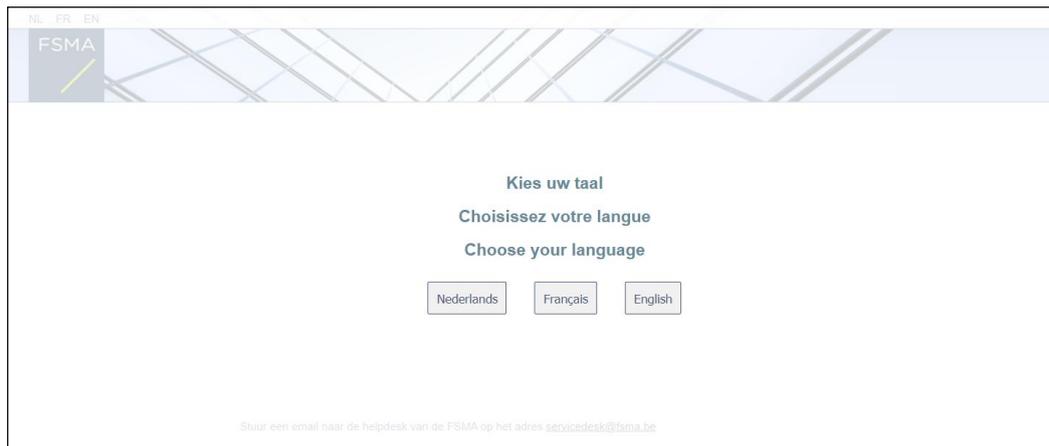


Figure 7: select language

After choosing your language, you need to accept the disclaimer. Click on 'I agree' at the bottom.

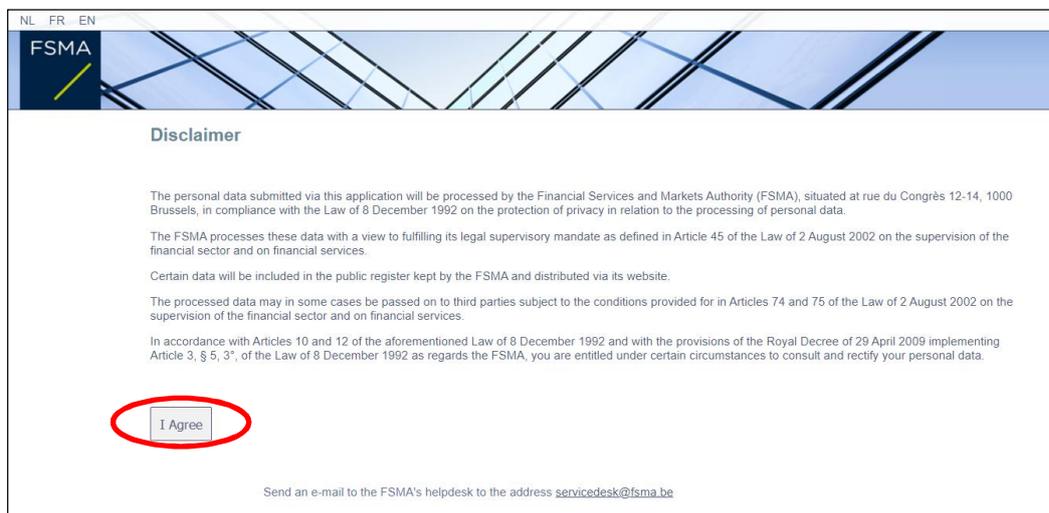


Figure 8: accepting the disclaimer

When logging in to FiMiS for the first time, the following page will appear and you will need to register a user profile this one time only.

Fill in your profile details. This is required only the first time (or whenever you first log in with a new certificate). Lastly, click on 'Register'.

FSMA

User Profile Registration

Identification Information

Name:*

First Name:*

Middle Name:

Belgian Registry Number:

E-Mail:*

Language:*

Gender:

Company Information

Company:

KBO Number:

Contact Information

Telephone:

Mobile:

Fax:

Address Information

Street:

Postal: Locality:

Country:*

Certificate Information

Cert. Authority: FSMA2 Issuing CA 1

Certificate DN: E=Sumitra.DellAgostino@fsma.be, CN=dellagostinos, OU=SharedNetwork, OU=Users, OU=FSMA, DC=prod, DC=cbf, DC=be

Figure 9: registration of user profile

After you have clicked on 'Register', the eMT application will start up.

3.5. The log on page

When logging on to FiMiS for the first time, users must enter the activation code the FSMA provided by email. If you have not yet received the activation code, please contact the secretariat of the Market Surveillance service (page 1).

FiMiS

Log On

Activation Code:

Figure 10: entering the activation code

This activation code will automatically be linked to your access certificate, so that the next time you log on, you will not have to enter your activation code again. After clicking on "Log on", you will land on the home page of the eMT application (see point 4).

3.6. Subsequent access to eMT – FiMiS

The next time the user logs on to FiMiS, he or she will need to follow only steps 3.1, 3.2 and 3.3.

4. Using eMT- FiMiS

The eMT application provides two different ways to notify transactions to the FSMA:

- The PDMR/PCA creates a survey via his or her access to the eMT application, after which a user at the listed company must confirm the survey to the FSMA (see point 6).
- In consultation with the PDMR/PCA, a user at the listed company submits a new survey on behalf of the PDMR/PCA (see point 5).

After the user has logged on, the following page appears. eMT consists of two sections: 'My eDossier' and 'Surveys'. The My eDossier section provides the user with a list of all the surveys (notifications) his/her listed company has submitted (this will in principle be for only one company). The list may show surveys submitted by the PDMRs or PCAs relating to the company's instruments or surveys submitted by users at the listed company on behalf of a PDMR or PCA.

Dossier	Survey	Regarding	Period	Situation	Lifecycle	State	Issue Date	Received Date
AVH	eMT - Lynn, Van Thillo	Van Thillo, Lynn	23/01/2023		Closed	Ok		01/02/2023
ACCENTIS	eMT - Evalien, Devlieger	Devlieger, Evelien	18/01/2023		Open	Initial		
ABLWIK	eMT - Lynn, Van Thillo	Van Thillo, Lynn	17/01/2023		Open	Error		
AGEAS	eMT - AUREL BGC	AUREL BGC	13/01/2023		Open	Pending		
CELYAD ONCOLOGY	eMT - Lynn, Van Thillo	Van Thillo, Lynn	13/01/2023		Open	Ok		
CELYAD ONCOLOGY	eMT - Lynn, Van Thillo	Van Thillo, Lynn	09/01/2023		Open	Pending		
KINEPOLIS	eMT - Lynn, Van Thillo	Van Thillo, Lynn	09/01/2023		Open	Ok		
ZVALORISE	eMT	Foretagsutveckling i Solna AB	08/12/2022		Open	Initial		
AGEAS	eMT - Durand SA	Durand SA	08/12/2022		Open	Initial		

Figure 11: the My eDossier section

The 'Surveys' section also contains a list of previously submitted surveys as well as a search function that allows for a search to be conducted by, among other things, listed company ('Dossier'), type of 'Survey' (in this case 'eMT Manager's transaction') or the PDMR or PCA ('Regarding').

Filter

Search

Dossier

Survey

Regarding

Period from: 17/02/2022 to

Lifecycle

Status

CLEAR

SEARCH EXPORT

Figure 12: the Surveys section

Using the 'Lifecycle' and 'Status' columns, you can determine which surveys still require follow-up and which ones have been finalized. The following table provides an overview of the possibilities a user might see:

Lifecycle	Created by	Status	Explanatory notes
Open	Declarer	Pending	Survey has still to be confirmed to the FSMA by the listed company.
		Rejected	Survey was rejected or cancelled by a user at the listed company.
	Company	Initial	Survey has not yet been saved and validated.
		OK	Survey has been saved and validated. There are no error messages. The survey has not yet been submitted to the FSMA.
		Error	Survey has been saved and validated. There are error messages that need to be resolved before the survey can be submitted.
		Deleted	Survey has been deleted but is still visible.
Closed		OK	Survey was successfully submitted to the FSMA
Published		OK	Survey was successfully submitted to the FSMA and published on the FSMA website

5. Submitting a new survey

The eMT application allows users at a listed company to submit a new survey on behalf of the PDMR/PCA. This must always be done, of course, in consultation with the PDMR/PCA. In most cases, however, it is the PDMR/PCA themselves who will submit the survey, after which the listed company will simply confirm it (see step 6).

5.1. Submitting a new survey

In order to submit a new survey, users at a listed company can click on 'New Survey' on the 'My eDossier' start screen under 'I Want To', after which the following screen will appear.

The screenshot shows the eMT application interface. At the top, there are navigation links: FiMIS, MY EDOSSIER, DOSSIERS, and SURVEYS. A warning banner reads: "Warning: Test environment - Opgepast: Test omgeving - Attention: Environnement test". On the left, under "I Want To", the "New Survey" option is circled in red. Below it are "Links" for eCorporate, eManex, FSMA Site, and FSMA Business Portal. The main area is titled "Surveys" and contains a table with the following data:

Dossier	Survey	Regarding	Period	Situation	Lifecycle	State	Due Date	Received Date
AVH	eMT - Lynn, Van Thillo	Van Thillo, Lynn	23/01/2023		Closed	Ok		01/02/2023
ACCENTIS	eMT - Evelien, Devlieger	Devlieger, Evelien	18/01/2023		Open	Initial		
ABLYNX	eMT - Lynn, Van Thillo	Van Thillo, Lynn	17/01/2023		Open	Error		
AGEAS	eMT - AUREL BGC	AUREL BGC	13/01/2023		Open	Pending		
CELYAD ONCOLOGY	eMT - Lynn, Van Thillo	Van Thillo, Lynn	13/01/2023		Open	Ok		
CELYAD ONCOLOGY	eMT - Lynn, Van Thillo	Van Thillo, Lynn	09/01/2023		Open	Pending		
KINEPOLIS	eMT - Lynn, Van Thillo	Van Thillo, Lynn	09/01/2023		Open	Ok		

Figure 13: Submitting a new survey

The user now has first of all to choose 'Survey' for 'Managers' transactions' by clicking on the arrow to the right. For most users, that will be the only option, but there may be other options as well for those who also have access to other FSMA surveys.

The user must then select the right listed company ('Dossier') by clicking on the arrow to the right. In this case as well, most users will see only one option.

Figure 14: Submitting a new survey (2)

Under 'Regarding', the user must first of all indicate whether the PDMR/PCA is a natural person or a legal person, by checking one of the two options. Depending on the option selected, the name of the natural person or legal person has to be entered in the next field.

If a survey is being submitted for a given PDMR/PCA for the first time, this person must be added by clicking on the button 'Create new natural person' or 'Create new legal person'.

The user will now see a screen where the details for the new natural person (Figure 15) or legal entity (Figure 16) can be entered.

Figure 15: creating a new natural person

After the details for the PDMR/PCA have been entered, the user must click on 'Register' to add this person. The eMT application stores the information on the PDMRs/PCAs who have been previously

entered, so that when submitting subsequent surveys, a user can easily select a PDMR/PCA who is already in the system by means of a dropdown menu.

For a legal entity (Figure 16), only the LEI code has to be entered. Click on 'Search company', and the application will automatically enter the information linked to that LEI code.

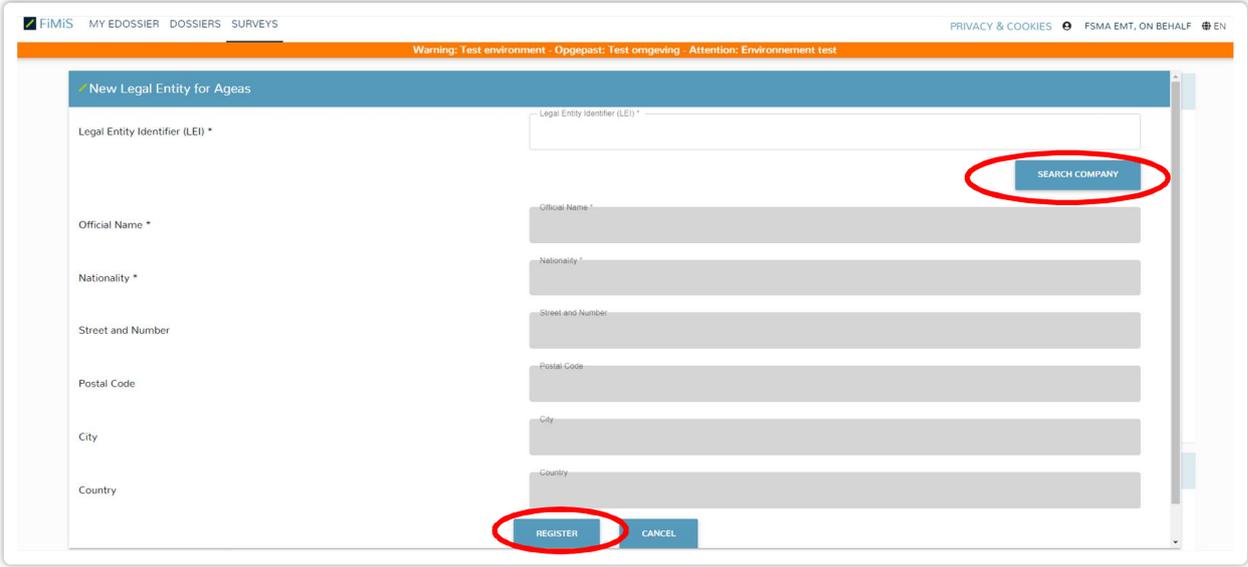


Figure 16: creating a new legal entity

After the name of the PDMR/PCA has been successfully added, the user has to click on 'Create a new survey'.

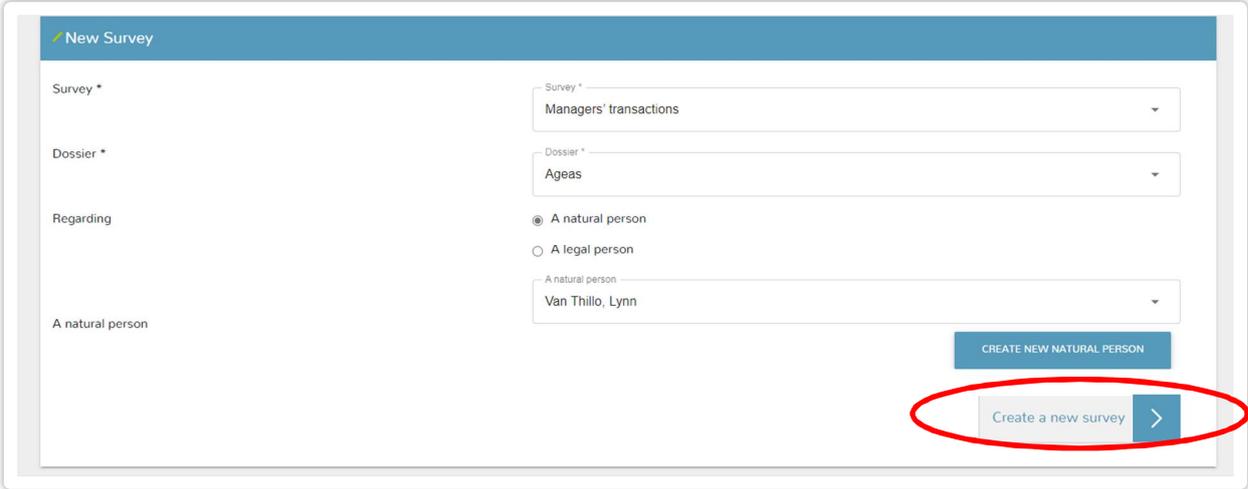


Figure 17: Creating a new survey

5.2. PDMR/PCA section

After the user has created a new survey, the following screen appears. Each survey consists of two sections.

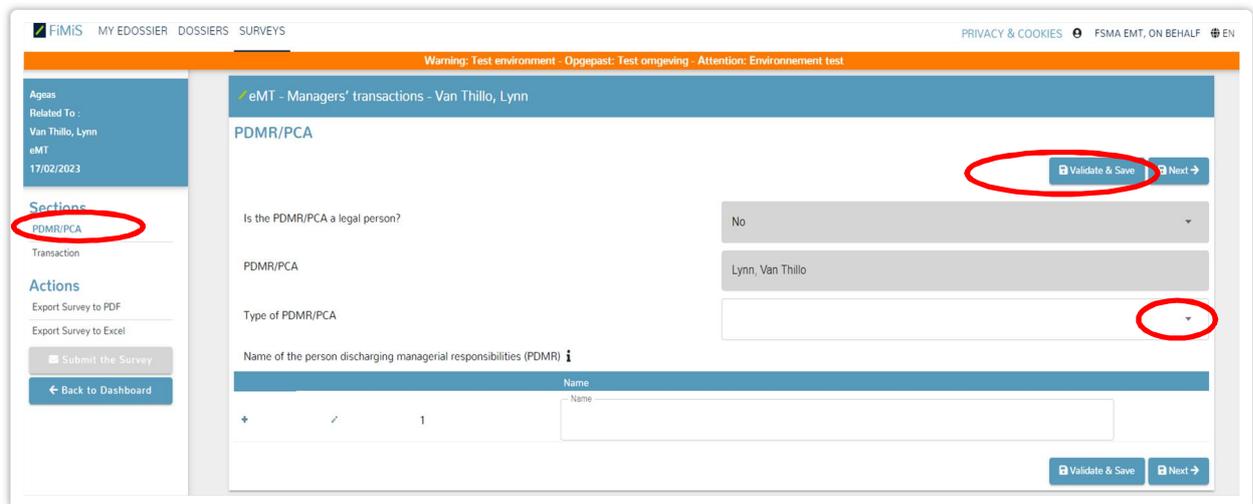


Figure 18: PDMR/PCA section

In the first section, the details of the PDMR/PCA are to be entered. The application automatically fills in the data for the user or for the PDMR/PCA for whom he/she is notifying a transaction (see point 5.1).

The user does have to specify what type of PDMR/PCA is involved, by clicking on the arrow (Figure 19) and then selecting the correct option in the dropdown list (Figure 19).

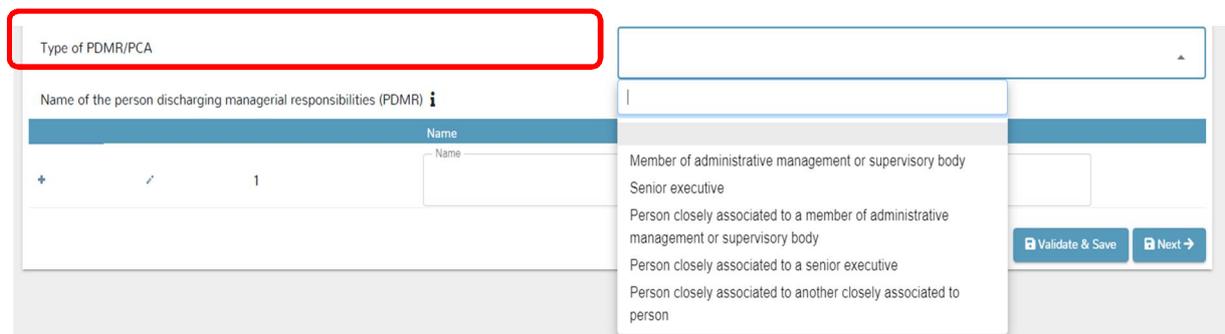


Figure 19: type of PDMR/PCA

If the transaction was made on behalf of a person closely associated (PCA), then the name of the PDMR with whom that person is associated has to be entered in the box below. If the person is associated with several managers, then it is possible to add extra text box(es) via the plus sign, in order to add all the persons in question.

If, however, the transaction was made on behalf of a PDMR ('Member of administrative, management or supervisory body' or a 'person discharging managerial responsibilities'), then no name is to be filled in, but the field can remain empty.

By clicking on 'Validate & Save', the information entered will be saved but not yet submitted to the FSMA.

5.3. Transaction section

The details concerning the transaction are to be entered on this screen. The application will automatically assign the transaction a serial number. The ISIN code of the financial instrument will also be entered automatically.

The screenshot shows the 'Transaction' section of the FIMIS application. The page title is 'eMT - Managers' transactions - Van Thillo, Lynn'. The left sidebar shows 'Sections' with 'Transaction' circled in red. The main form contains fields for: Transaction serial number (202300019), Type of financial instrument (Share), ISIN code of the financial instrument (BE0974264930), Transaction type, If applicable, specification of transaction type, Trading venue where the transaction was executed (Euronext Brussels), Transaction date, and Currency (EURO). A 'Validate & Save' button is in the top right.

Figure 20: Transaction section

The application makes it possible to notify several transactions on an aggregated basis, if they are of the same type (purchase or sale) and were conducted on the same day. In that case, answer 'Yes' to the question whether the notification bears on multiple aggregated transactions (see figure below) and the details of at least two transactions should be entered (in other words, at least two lines). An extra line can be added for each extra transaction using the plus sign.

If you answer 'No' because the survey is not for aggregated transactions, then the fields under 'Details of aggregated transactions' must be left empty.

The screenshot shows the 'Detail of aggregated transactions' section. A dropdown menu is set to 'No' for the question 'Does the notification bear upon multiple aggregated transactions?'. Below is a table with columns 'Quantity', 'Unit Price', and 'Amount'. The table has one row with a plus sign icon and the number '1'. A 'Validate & Save' button is circled in red at the bottom right.

Figure 21: Transaction section - aggregated notifications

In the 'Comment' field, extra information can be entered regarding the type of transaction. This information will be published, together with the notification, on the FSMA website. For special types of transactions, it may be that the 'Transaction type' and 'Where applicable, specifics of the type of transaction' are insufficient, and the FSMA asks that additional information be provided in the

'Explanations' field regarding the type of transaction. In all other cases, filling in this field is entirely voluntary.

By clicking on 'Validate & Save', the information entered is saved. It has not yet been submitted to the listed company and the FSMA. As long as the survey has not been submitted, the user can retrieve it at a later time and modify it.

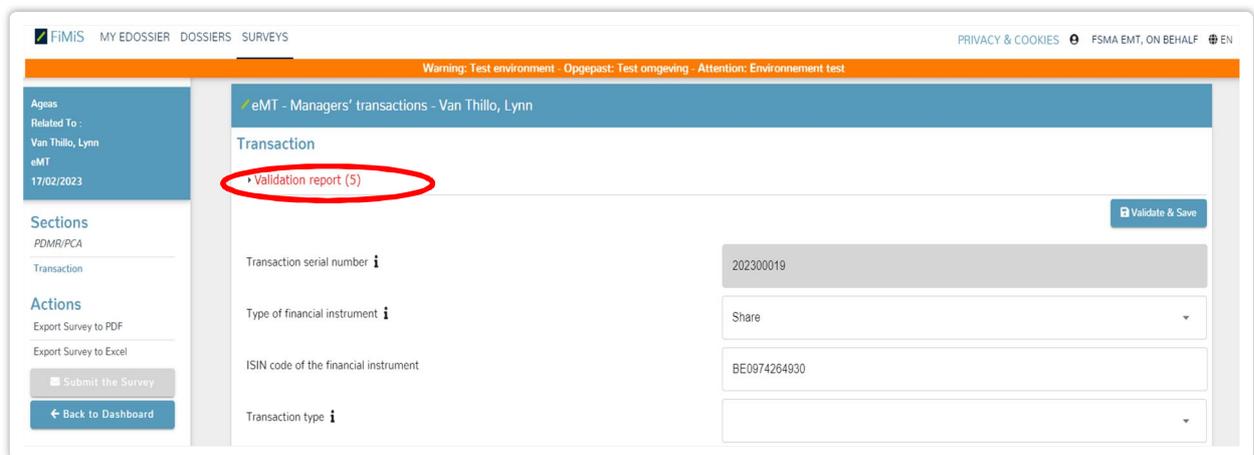


Figure 22: Transaction section - error message

If the information entered is contrary to the validation rules, the message 'Validation report' will appear at the top of the screen when you click on 'Validate & Save'. Click on the arrow to the left of 'Validation report' to see the reasons for the error message. The user can then modify the data and click again on 'Validate & Save' until all the validation rules have been met and no 'Validation report' appears.



Figure 23: Transaction section - error message details

For more information about submitting a notification to the FSMA, see point 7.

6. Following up on a survey submitted by a PDMR/PCA

If a PDMR/PCA has submitted a survey, all users at that person's listed company will be informed via email. These are all the persons who have access via a certificate.

Dossier	Survey	Regarding	Period	Situation	Lifecycle	State	Due Date	Received Date
AGEAS	eMT - Lynn, Van Thillo	Van Thillo, Lynn	17/02/2023		Open	Error		
AVH	eMT - Lynn, Van Thillo	Van Thillo, Lynn	23/01/2023		Closed	Ok		01/02/2023
ACCENTIS	eMT - Evelien, Devlieger	Devlieger, Evelien	18/01/2023		Open	Initial		
ABLYNX	eMT - Lynn, Van Thillo	Van Thillo, Lynn	17/01/2023		Open	Error		
AGEAS	eMT - AUREL BGC	AUREL BGC	13/01/2023		Open	Pending		
CELYAD ONCOLOGY	eMT - Lynn, Van Thillo	Van Thillo, Lynn	13/01/2023		Open	Ok		
CELYAD ONCOLOGY	eMT - Lynn, Van Thillo	Van Thillo, Lynn	09/01/2023		Open	Pending		

Figure 24: following up on a survey submitted by a PDMR/PCA

Users can see via the 'My eDossier' start page which surveys require follow-up:

- Surveys that were submitted by the PDMR/PCA but that still require approval by the company are those where the Lifecycle is 'Open' and the Status is 'Pending';
- Surveys for which the Lifecycle is 'Open' and the Status is 'OK', 'Initial' or 'Error' have not yet been completely filled in or are not yet in line with the validation rules (see point 5);
- Surveys for which the Lifecycle is 'Closed' and the Status is 'OK' have been successfully submitted to the FSMA.

By clicking on 'eMT' in the 'Survey' column, the user can open a survey from the list.

The user at the listed company thus has to pay attention first and foremost to surveys that are marked 'Open' and 'Pending', so that these may be submitted to the FSMA.

The user of the listed company has to click on both sections, 'PDMR/PCA' and 'Transaction', in order to check and/or modify the information in the survey.

Surveys submitted by a PDMR/ PCA can be viewed but not modified by a user at the listed company. If there is a problem with the survey, a user can, however, reject it by clicking on 'Reject Survey'. The status of the survey will then be set to 'Rejected'.

eMT - Managers' transactions - AUREL BGC

PDMR/PCA

Validate & Save | Next →

Is the PDMR/PCA a legal person? Yes

PDMR/PCA: AUREL BGC

Type of PDMR/PCA: Person closely associated to a senior executive

Name of the person discharging managerial responsibilities (PDMR):

Name
ABC

Validate & Save | Next →

Actions: Reject Survey (highlighted), Export Survey to PDF, Export Survey to Excel, Submit the Survey, Back to Dashboard

Figure 25: rejecting a survey submitted by a PDMR/PCA

If the user considers that there is no problem with the PDMR/PCA and that the notification seems to be in order, it can be submitted to the FSMA (see point 7).

7. Submitting the survey

If the user has checked the survey submitted by the PDMR/PCA (point 6) or if the PDMR/PCA and the Transaction sections have been filled in (point 5), the user can submit the notification to the FSMA by clicking on 'Submit the Survey'.

The screenshot shows the FIMIS interface for submitting a survey. The top navigation bar includes 'FIMIS', 'MY EDOSIER', 'DOSSIERS', and 'SURVEYS'. A warning banner indicates 'Warning: Test environment - Opgepast: Test omgeving - Attention: Environment test'. The main content area is titled 'eMT - Managers' transactions - AUREL BGC' and 'PDMR/PCA'. The form includes the following fields and options:

- Buttons: 'Validate & Save' and 'Next →' (top right).
- Field: 'Is the PDMR/PCA a legal person?' with a dropdown menu set to 'Yes'.
- Field: 'PDMR/PCA' with a text input containing 'AUREL BGC'.
- Field: 'Type of PDMR/PCA' with a dropdown menu set to 'Person closely associated to a senior executive'.
- Field: 'Name of the person discharging managerial responsibilities (PDMR)' with a table containing one entry:

Name
ABC

The left sidebar contains 'Sections' (PDMR/PCA, Transaction) and 'Actions' (Reject Survey, Export Survey to PDF, Export Survey to PDF, **Submit the Survey** (circled in red), Back to Dashboard).

Figure 26: submitting the survey

A pop-up screen will appear warning the user that the survey can no longer be modified. If the user clicks on 'OK', the survey is submitted.

After having clicked on 'OK', the user will then be returned automatically to the 'Surveys' section (see point Error! Reference source not found.).

8. Further steps

Once a survey is set to 'Closed', it has been successfully submitted to the FSMA. At the end of the day, it will appear on the FSMA website, after which its status will be set to 'Published'.