

WM-LEIPORTAL

Manual Information about the Group Structure

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This manual was last updated on February 27, 2019. It is continuously revised to reflect the requirements stipulated by ISO 17442, the Financial Stability Board (FSB), and the Regulatory Oversight Committee (ROC). Only the latest revision of this manual is valid. Please visit the WM-LEIPORTAL to ensure that you have access to the latest version of the manual.

1 Information about the Group Structure

From May 2017 onwards, the LEI ROC and the GLEIF demand that the reference data of every legal entity also include information on the group structure. The aim of this provision is to find an answer not only to the question of “Who is Who” but also to the question of “Who owns Whom”.

Information must be provided on the direct parent and the ultimate parent.

I. The direct parent as defined by the LEI ROC¹

The direct parent is defined as the next higher legal entity that prepares consolidated financial statements (mandatory) in compliance with the accounting rules applicable to the parent and consolidates and indicates the abovementioned entity within these statements.

II. The ultimate parent as defined by the LEI ROC²

The ultimate parent is defined as the highest legal entity that prepares consolidated financial statements (mandatory) in compliance with the accounting rules applicable to the parent and consolidates the abovementioned entity within these statements.

Upon indicating the group structure, you can choose between the following three options on the WM-LEIPORTAL:

- Parent company with an LEI
- Parent company without an LEI
- No information (plus the reason(s))

In the first stage, only those parent companies are indicated that prepare consolidated financial statements (mandatory) which also include the subsidiary. If you have a controlling parent that does not prepare consolidated financial statements, please select under the “No information” option the reason: “The controlling entity is not subject to prepare consolidated financial statements.”

For further examples please refer to **section 2.1**.

¹ See: http://www.leiroc.org/publications/gls/lou_20161003-1.pdf; 2.2 Definition of parent relationships in the GLEIS, p. 8 f.

² See: http://www.leiroc.org/publications/gls/lou_20161003-1.pdf; 2.2 Definition of parent relationships in the GLEIS, p. 8 f.

For the following entities, the parent-child relationships are not depicted within the LEI system³. Accordingly, no information needs to be provided on the direct parent or the ultimate parent.

- Joint venture
- Associated company
- Structured (non-consolidated) company
- International branches

Further exceptions are entities that have submitted an application for a Fund or a Legal Entity of Public Law, as well as trusts, foundations and associations. These are generally not listed by the parent as a fully consolidated subsidiary.

Please select in the abovementioned cases under the “No information” option the reason: “No controlling entity existing or unknown”.

2 No Information on the Parent Company

If no information can/may be provided on the parent company, please select one or more of the following reasons.

Please select one or more reasons why you cannot enter Information about the parent

<input type="checkbox"/>	No controlling entity existing or unknown	?
<input type="checkbox"/>	The entity is controlled by natural person(s)	?
<input type="checkbox"/>	The controlling entity is not subject to prepare consolidated financial statements	?
<input type="checkbox"/>	Legal obstacles prevent providing/publishing this information	?
<input type="checkbox"/>	Binding legal commitments prevent providing/publishing this information	?
<input type="checkbox"/>	No consent of the parent entity for providing/publishing this information	?
<input type="checkbox"/>	Relationship not publicly known. Detriment for child or parent entity not excluded	?
<input type="checkbox"/>	Relationship not publicly known. Disclosure would be detrimental for child or parent entity	?

WM Datenservice will not review the correctness of the reasons stated by you.

³ See: http://www.leiroc.org/publications/gls/lou_20161003-1.pdf; 2.2 Definition of parent relationships in the GLEIS, p. 9.

Choice WM-LEIPORTAL

Further Explanation

No controlling entity existing or unknown	- No parent, because there is no further company existing or known which controls the entity (e.g.> 50% of shares).
The entity is controlled by natural person(s)	- No parent, because the shareholders of the entity are mostly natural persons.
The controlling entity is not t required to prepare consolidated financial statements	- No parent, because the entity is controlled by legal entities not required to prepare consolidated financial statements.
Legal obstacles prevent providing/publishing this information	- Obstacles in the laws or regulations of a jurisdiction prevent providing or publishing this information.
Binding legal commitments prevent providing/publishing this information Contractual obligations (or commitments) prevent providing or publishing this information	- Binding legal commitments (other than the laws or regulations of a jurisdiction), such as articles governing the legal entity or a contract, prevent providing or publishing information about the parent entity. Contractual obligations (or commitments), such as articles governing the legal entity prevent providing or publishing information about the parent entity
No consent of the parent entity for providing/publishing this information	- For providing/publishing of information about the parent entity, the consent of the parent was necessary under the applicable legal framework and the parent did not consent or could not be contacted.
Relationship not publicly known. Detriment for child or parent entity not excluded	- After consultation with the parent entity, the child entity could not ensure the lack of detriment to the entities involved. This exception may only be selected if the relationship is not already in the public domain.
Relationship not publicly known. Disclosure would be detrimental for child or parent entity	- The disclosure of this information would be detrimental to the child or parent entity. This exception may only be selected if the relationship is not already in the public domain.

2.1 The “No information” Option – Examples and Details

Examples/Details	Selectable Reason
You have no information on a parent company	No controlling entity existing or unknown
You are the ultimate parent company, there is no further parent company (above you)	No controlling entity existing or unknown
Several companies hold a stake in your company. None of them holds a stake > 50%	No controlling entity existing or unknown
The entity is a ⁴ <ul style="list-style-type: none"> - joint venture - associated company - structured (non-consolidated) company - international branch 	No controlling entity existing or unknown
The shareholders are only/mainly natural persons	The entity is controlled by natural person(s)
The parent company does not prepare consolidated financial statements.	The controlling entity is not subject to prepare consolidated financial statements.
The parent company prepares consolidated statements, but the entity is not consolidated within these statements.	The controlling entity is not subject to prepare consolidated financial statements.
The parent company prepares consolidated statements, but the entity is not consolidated within these statements as the entity has only been established/acquired at the end of the financial year in question.	The controlling entity is not subject to prepare consolidated financial statements. (Optionally, the parent company can be indicated if the responsible auditor confirms that the entity will be included in the consolidated statements of the following year.)
The parent company has been newly established and therefore has not yet prepared consolidated statements.	The controlling entity is not subject to prepare consolidated financial statements.

⁴ See: http://www.leiroc.org/publications/gls/lou_20161003-1.pdf; 2.2 Definition of parent relationships in the GLEIS, p. 9.

Please notice:

If another company is indicated as the parent company (direct or ultimate) in combination with "No Information", the following two reasons are not considered meaningful:

- No controlling entity existing or unknown
- The entity is controlled by natural person(s)

Examples:

Direct parent = Company XYZ

Ultimate parent = The entity is controlled by natural persons(s)

In this case please indicate Company XYZ also as ultimate parent.

Direct parent = No controlling entity existing or unknown

Ultimate parent = Company ABC

In this case please indicate Company ABC also as direct parent.

Simple group structure: direct = ultimate parent

Does not prepare **consolidated** financial statements:

- Direct and ultimate parent:
No information – The controlling entity is not subject to prepare consolidated financial statements



Parent Company

>50%



Your Entity
(Your LEI)

Prepares **consolidated** financial statements:

- Indicate as direct and ultimate parent
 - with LEI
 - without LEI

Complex group structure

Does not prepare **consolidated** financial statements:

- ultimate parent:
No information – The controlling entity is not subject to prepare consolidated financial statements

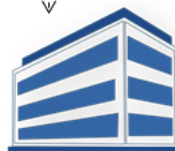


ultimate parent

>50%



other entity /entities



direct parent

>50%



Your Entity
(Your LEI)

Prepares **consolidated** financial statements:

- Indicate as ultimate parent
 - with LEI
 - without LEI

Does not prepare **consolidated** financial statements:

- direct parent:
No information – The controlling entity is not subject to prepare consolidated financial statements

Prepares **consolidated** financial statements:

- Indicate as direct parent
 - with LEI
 - without LEI

3 Parent with an LEI

If an active LEI of the parent company already exists (with the status ISSUED, LAPSED, PENDING TRANSFER), the data on the parent company can be transmitted to WM Datenservice via the LEI. Please enter the **LEI** or the **name** of the parent company into the designated field and select from the drop-down list the most suitable option. Subsequently, the reference data on the parent company will be displayed for verification.

	Parent with an LEI <input checked="" type="radio"/>	Parent without an LEI <input type="radio"/>	No Information <input type="radio"/>
LEI of the Parent:	<p>Herausbergemeinschaft Wertpapier-Mitteilr</p> <p>Please enter the LEI or the name of the parent and select it in the displayed field for confirmation.</p> <p>LEI: 5299000J2N45DDNE4Y28 EntityName: Herausbergemeinschaft Wertpapier-Mitteilungen Keppler, Lehmann GmbH & Co. KG</p>		
Accounting Standard of the Consolidated Financial Statement (CFS) from the abovementioned Parent:	<p>Other</p>		
Andere Bilanzierungsstandard: *	<p>HGB</p>		
Link/URL to the current Consolidated Financial Statement:	<p>www.wmGruppe/finacial_statemant-2016</p>		
Please upload here the current consolidated financial statement or other documents for validation the parent-child relationship:	<p>Datei auswählen WM Gruppe J...s 2016.pdf</p>		

Please select the appropriate accounting standard. If the option “Other” is selected, an additional free-text field will open. Please enter, for example, HGB (German Commercial Code), UGB (Austrian Commercial Code) into this field.

Furthermore, you have the option to enter the link to the financial statements or upload the financial statements as a file.

If your direct parent is also your ultimate parent, you do not have to enter the data twice. All you have to do is click the following button:

Ultimate Parent	Same as Direct Parent
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4 Parent without an LEI

If you are not sure whether an LEI has already been allocated to your parent company, you can verify this on the WM-LEIPORTAL by selecting LEI Search => LEI Search (Global).

If no LEI has been allocated to your parent company, please enter the following reference data manually.

	Parent with an LEI <input type="radio"/>	Parent without an LEI <input checked="" type="radio"/>	No Information <input type="radio"/>
Name of the Parent: *	Herausberggemeinschaft Wertpapier-Mitteil		
Register:	Amtsgericht Frankfurt am Main		
Register No.:	HRA 15378		
Legal Headquarters			
Street and House Number: *	Düsseldorfer Straße 16		
Zip / Postal Code: *	60329		
City: *	Frankfurt a. M.		
Country: *	Germany		
State / Region: *	Hessen		
Administrative Headquarters			
Street and House Number: *	Düsseldorfer Straße 16	Same as Legal Address	
Zip / Postal Code: *	60329		
City: *	Frankfurt a. M.		
Country: *	Germany		
State / Region: *	Hessen		
Accounting Standard of the Consolidated Financial Statement (CFS) from the abovementioned Parent:	Other		
Andere Bilanzierungsstandard: *	HGB		
Link/URL to the current Consolidated Financial Statement:	www.wmgruppe.de/financialstatement-2016		
Please upload here the current consolidated financial statement or other documents for validation the parent-child relationship:	Datei auswählen wmGruppe_fi...nt2016.pdf		

Please select the appropriate accounting standard. If the option “Other” is selected, an additional free-text field will open. Please enter, for example, HGB (German Commercial Code), UGB (Austrian Commercial Code) into this field.

Furthermore, you have the option to enter the link to the financial statements or upload the financial statements as a file.

If your direct parent is also your ultimate parent, you do not have to enter the data twice. All you have to do is click the following button:

Ultimate Parent	Same as Direct Parent
-----------------	-----------------------

5 LEI-renewal with already existing information about the group structure

There are different options to renew an LEI with the information about the group structure (direct and ultimate parent company):

5.1 The information about the parent company is still accurate and do not need to be updated


If there are no changes with regard to the parent companies (direct and ultimate), you can place your renewal-application directly to the shopping cart and complete the procedure as usual.

5.2 The information about your parent (s) has to be corrected (e.g., address)

The following data can be edited:

- For a parent company with LEI:
 - Accounting Standard
 - File Upload
 - Link
- For a parent company without LEI:
 - Reference Data (e.g. legal address, commercial register and register number)
 - Accounting Standard
 - File Upload
 - Link

If the name of the company was changed in the past, please set up a new parent company (see chapter 5.3).

You can make the changes after starting the renewal process and placing the LEI to your shopping cart. Please click on  "Edit entry".

You can now update the accounting standard, link or upload a new file (consolidated annual / group report).

In the case of a parent company **without LEI**, you also have the option to update the reference data (address, register, register number). Please click on "Update invalid data".

Ultimate Parent
Same as Direct Parent


The ultimate parent is defined as the highest legal entity that prepares consolidated financial statements (mandatory) in compliance with the accounting rules applicable to the parent and consolidates the abovementioned entity within these statements.

Important: The information is only required if **consolidated financial statements** are prepared.
A parent that exercises control but does **NOT consolidate** does NOT need to be stated! Please select "No Information" in this case -> The controlling entity is not subject to prepare consolidated financial statements.

Set up new parent
Update invalid data

After completing / correcting your data, you can proceed with the renewal process as usual. Please, place your renewal application back to the shopping cart and then click on "Add to Shopping Cart".

5.3 The original parent without LEI has an LEI now

You can make the changes after starting the renewal process and placing the LEI to your shopping cart. Please click on  "Edit entry".

Please click on "Set up new parent company":

Direct Parent

The direct parent is defined as the next higher legal entity that prepares consolidated financial statements (mandatory) in compliance with the accounting rules applicable to the parent and consolidates and indicates the abovementioned entity within these statements.

Important: The information is only required if **consolidated financial statements** are prepared.
A parent that exercises control but does **NOT consolidate** does NOT need to be stated! Please select "No Information" in this case -> The controlling entity is not subject to prepare consolidated financial statements.

Set up new parent

LEI of the Parent: *

5299000J2N45DDNE4Y28

Please enter the LEI or the name of the parent and select it in the displayed field for confirmation.

LEI: 5299000J2N45DDNE4Y28
EntityName: Herausbergemeinschaft Wertpapier-Mitteilungen Keppler, Lehmann GmbH & Co. KG

Accounting Standard of the Consolidated Financial Statement (CFS) from the abovementioned Parent: *

US-GAAP

Link/URL to the current Consolidated Financial Statement:

Please upload here the current consolidated financial statement or other documents for validation the parent-child relationship:

Datei auswählen

Keine ausgewählt

Now select the option "parent company with LEI". After that you are asked to specify a date when the old relationship is no longer valid (end of last relationship).

Direct Parent

The direct parent is defined as the next higher legal entity that prepares consolidated financial statements (mandatory) in compliance with the accounting rules applicable to the parent and consolidates and indicates the abovementioned entity within these statements.

Important: The information is only required if **consolidated financial statements** are prepared.
A parent that exercises control but does **NOT consolidate** does NOT need to be stated! Please select "No Information" in this case ->
The controlling entity is not subject to prepare consolidated financial statements.


Parent with an LEI
Parent without an LEI
No Information

End of the last relationship: *

TT.MM.JJJJ

Then enter the LEI or the name of the parent company. Via the appearing drop-down please confirm your input. After successful acceptance, the reference data of the selected parent company will be displayed.

5.4 Your parent company (direct or ultimate) has been changed (e.g. takeover)

You can make the changes after starting the renewal process and placing the LEI to your shopping cart. Please click on  "Edit entry".

Before entering the end date of the last relationship, you can specify a new parent company (with or without LEI) or "no information" about the parent company (with selection of at least one of the listed reasons, for example, the controlling company does not prepare consolidated financial statements). Please select the corresponding option.

Parent with an LEI
Parent without an LEI
No Information

Please proceed as described in chapter 5.3.

Please also note that a parent company exercising control but not providing a consolidated annual / consolidated financial statements is specified by the option **"No Information - The Controlling Company does not prepare consolidated financial statements"**.

After completing / correcting your data, you can proceed with the renewal process as usual. Please place your renewal application back to the shopping cart and then click on "order the shopping cart".

Further Questions

On business days, we are available to answer any further questions between 9:00 a.m. and 4:00 p.m. (CET) at **+49 (69) 27 32 - 600**.

You may also contact us via email at:

lei-helpdesk@wmdaten.com (for LEI bulk application, technical and LEI-specific questions) or

lei-service@wmdaten.com (for questions regarding invoices)