ESMA_QA_777

Submission Date
19/04/2023

Status: Forwarded to EC/Public Consultation/Other

Additional Information

Level 1 Regulation
Market Abuse Regulation (MAR) Regulation (EU) No 596/2014 - Market Intergrity

Level 2 Regulation
Regulation 2016/347- ITS on format of insider lists

Topic
Insider lists

Additional Legal Reference
Article 18(1) of MAR

Subject Matter
Information to be included into insider list of the issuer on persons that are subject to independent obligation to manage insider list (e.g. advisors and consultants)

Question

As certain persons have an independent obligations to draw up and manage insider list of the issuer (e.g. advisors, consultants, credit agency) under Article 18(1) of MAR, what information should be reflected in the insider list of the issuer: (i) all required information under insider list template for a contact person of such third party, in addition in the field "function and reason for being insider" indicating that this is only a contact person of third party that has independent obligation to draw-up and manage independent insider list, or (ii) with deviation from template of insider list, name and contact details of such company itself, omitting certain fields, such as name, surname, birth surname.