

**ITEMIZATION OF PURCHASES, SALES,  
CAPITAL GAINS AND CAPITAL LOSSES for  
SECURITIES AND DERIVATIVES  
(VSAPUUSE)  
DATA FORMAT SPECIFICATION 2018**

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# Change history

Date	Version	Description
2.1.2018	1.0	First release concerning the 2018 taxable year.

## 1 INTRODUCTION

This guidance explains the structure of the required inbound file and the check procedures that follow. For more information, see [tax.fi > About us > Information and material on taxation > IT developers > e-Filing guidance > Electronic filing of information returns General description](#).

Filers are expected to report the facts and information detailed in the official decision of the Finnish Tax Administration governing the common obligations to submit information.

These facts and information can only be reported via an online computer connection. No printed-paper form is available.

## 2 DESCRIPTION OF THE INFORMATION FLOW AND SUBMITTAL OF FILES

For more information on how filers must identify themselves electronically, on the requirements on Katso ID and Katso Role, and on the information flow's check routine for authorizations, click [here](#).

For more instructions on submitting information and descriptions on filer roles see [10 Instructions and examples](#)

### 2.1 Act governing long-term savings agreements (Individual Retirement Accounts)

This information return is not designed for Finnish-resident taxpayers' long-term savings agreement-related assets or transactions.

Intermediaries of securities transactions must file a separate information return to report Finnish-resident taxpayers' holdings inside the Individual Retirement Account within the meaning of the Act governing long-term savings agreements. The data format specification and other detailed requirements are found in "Long-term savings (PS): Itemization of purchases and sales of securities and derivatives" (filing VSAPPSPS).

If nonresident taxpayers have purchased or sold securities and derivatives or units in an investment fund, a complete annual information return should be filed as outlined in this instruction including specifications by each beneficiary and all relevant filer Roles, even if the transactions were related to assets within the meaning of the Act governing long-term savings agreements (1183/2009).

## 3 MAKING CORRECTIONS

For more information, see the article called Making corrections to submitted annual information ([tax.fi > About us > Information and material on taxation > IT developers > e-Filing guidance > Making corrections to e-filed submittals of information returns](#)).

## 4 PERIOD OF VALIDITY

This specification sets out the requirements of file formatting that come into force 25 January 2018 and continue to be in force until a new version of this specification is released.

Submit the annual information for the 2017 calendar year by 31 January 2019.

## 5 CHANGES ON THE PREVIOUS YEAR

Version	Code	Data element	Description
1.0	9/087 283-312/159	Document type HexClear reference	ID removed The position is now a 'reserve space'.
	48-57/152 350-384/166	Transfer tax paid → Paid transfer tax Infinity Matching Reference → Reference	Description is re-edited.
	336/162	Arvopapereiden hankintahinta	Data element value change 0→2
	9/082 619-653/041 654-676/042 677-711/048 712-723/014 584-618/049	Deletion Name of the contact person Telephone number of the contact person Software application that produced the file Name of the software that produced the file Transaction code	Added as a new data element
	272-282/010  23-37/149 38-47/150 48-57/152 321-335/161 337-348/163 66-81/153	Intermediary's business id  Transaction price or redeemed price of fund units Costs incurred in the trading of securities Paid transfer tax Subscription price of fund units / purchase price of securities Costs of fund unit subscription / purchase of securities Quantity of units sold/purchased/ redeemed (number of units)	Format changes: YTUNNUS → YTUNNUS2 +N10 → R12,2 +N10 → R7,2 +N10 → R7,2 +N15 → R12,2  +N10 → R7,2  +N14 → +D9,6, position is longer now, carries entries forward up to position 175.
	140-174/085	Buyer's/seller's/redeemer's name	Data element length is changed AN70 → AN35 Position 105-139 are now a 'reserve space'
	385-549/739	Other reference and additional information → Additional information	Description and content are re-edited.
	38-47/150 48-57/152	Costs incurred in the trading of securities Paid transfer tax	Data element is not mandatory any more
			Fixed-length element's length is now 583 → 723

## 6 DATA FORMAT SPECIFICATION

Position	ID	P/V	T	L/T	Description	Format	Values
1-8	000	P	T		Identifier	AN8	VSAPUUSE
9	082	V			Deletion	A1	D
10	121	P	T	*	Role of filer 1 = See 11.1 Reporting requirements of intermediaries in securities (Filer role 1) 2 = See 11.2 Reporting requirements of managements of funds (Filer role 2) 3 = See 11.3 Capital gains and capital losses (Filer role 3) 4 = See 11.4 Filer role 4 (Role used instead of role 3 in situations where the filer has fully ensured, to avoid double reporting, that the sales transaction will not be reported by any intermediary with role 1)	N1	1,2,3,4

11-21	083	P	T	*	Business id or personal identity code of seller or buyer/redeemer	YTUNNUS    HETU	
22	084	P	T	*	Purchase / sale code 1 = purchase 2 = sale 3 = disposition of shares in a swap (§ 52 f, see above) 4 = receipt of shares in a swap (§ 52 f) 5 = redemption of a share or a fund unit 6 = share repurchase (as a result of a public bid to shareholders)	N1	1,2,3,4,5,6
23-37	149	P			Transaction price or redeemed price of fund units See 11.8 Reporting monetary values	R12,2	
38-47	150	V			Costs incurred in the trading of securities See 11.8 Reporting monetary values	R7,2	
48-57	152	V			Transfer tax paid See 11.8 Reporting monetary values	R7,2	
58-65	124	P	T		Date of sale/purchase or redemption of fund unit	PPKKVVVV	
66-81	153	P			Quantity of units sold/purchased/ redeemed (number of units) See 11.9 Quantity of units sold/purchased/redeemed	+D9,6	
82-96	154	V	ET		ISIN code for the object of sale/purchase or redemption	ISINKOODI	
97-98	127	P	T	*	Security type code See 9 Security type codes	N2	01,02,03,04,05,06,07,08,09,11,41,42,43,44,51,52,53,54,55,56,57,58,59,61,81,82,83,84,99
99-128	128	P	T		Name of security	AN30	
129-137	129	P	T		Business id of company issuing the security	YTUNNUS	
138-139					Reserve space		
140-174	085	V/P	ET	*	Buyer's/seller's/redeemer's name Write the name, if no personal ID or business ID is known (data element 083/11–21).	AN35	
175-207					Reserve space		
208-237	031	V			Buyer's/seller's/redeemer's address	AN30	
238-242	032	V			Buyer's or seller's postal code	N5	
243-269	033	V			Buyer's or seller's post office	AN27	
270-271	034	P			Buyer's or seller's country code (ISO 3166)  See 10 Country codes	MAA TUNNUS	
272-280	010	P	T		Intermediary's business id	YTUNNUS2	
281-312					Reserve space		
313-320	160	V/P		*	Date of subscription of fund units / purchase of securities Fill with zeros if you do not know the purchase price	PPKKVVVV	
321-335	161	V/P		*	Subscription price of fund units / purchase price of securities	R12,2	
336	162	V/P		*	Purchase price of securities is known / is not known	N1	2,1

					2 = purchase price is known 1 = purchase price is not known		
337-346	163	V		*	Costs of fund unit subscription / purchase of securities	R7,2	
347-348	164	V		*	Corporate action code 01 = no corporate action 02 = at least one corporate action has taken place (e.g. split, reverse split, bonus issue, ordinary issue, merger, demerger, swap, refund of corporate capital) 03 = do not know whether corporate action has taken place	N2	01,02,03
349	165	V		*	Purchase price and date are client-supplied 1 = yes 2 = no 3 = do not know See 11.111 Purchase price and date are client-supplied	N1	1,2,3
350-384	166	V/P	ET	*	Reference (e.g. HexClear, Infinity Reference, other) NOTE: if the same transaction is reported by Roles 1 and 3, the Reference should be the same, if possible.	AN35	
385-549	739	V			Additional Information  See 11.10 Additional information	AN165	
550-569	168	V/P	ET	*	Buyer's/seller's/redeemer's TIN issued by home country (taxpayer identification number or other personal or corporate identity number)	AN20	
570-583	198	P			Software-generated timestamp	PPKKVVVV HHMMSS	
584-618	049	V/P	ET	*	Transaction code The filer's unique code number for the transaction. It provides specific identification of all security trading transactions although date, quantities and types of securities would be the same. See 11.12 Transaction code	AN35	
619-653	041	V			Name of the contact person	AN35	
654-688	042	V			Telephone number of the contact person	PUHELIN2	
689-723	048	V			Software application that produced the file	AN35	
724-735	014	P	T		Name of the software that produced the file	Y- TUNNUS_AN 2	
	999	P			Final identifier	+N8	

## 7 DATA CHECKS

New/Changed	ID	Description of rule
M	083 085 168	Buyer's/seller's/redeemer's name (085) and Buyer's/seller's/redeemer's home-country ID code or TIN (168) are required data elements if you have entered a dummy business ID or a dummy personal identity code of the seller or

		<p>buyer/redeemer (083)..</p> <p>#1355; Buyer's/seller's/redeemer's name (085) and Buyer's/seller's/redeemer's home-country ID code or TIN (168) are required data elements if you have entered a dummy business ID or a dummy personal identity code of the seller or buyer/redeemer (083)..</p>
U	121 166	<p>If the Role of filer (121) is Role 1 or Role 3, you must populate Reference (166) with a non-zero value.</p> <p>#1356; If the Role of filer (121) is Role 1 or Role 3, you must populate Reference (166) with a non-zero value.</p>
	121 160	<p>If the Role of filer (121) is 1, you must not populate Date of subscription of fund units / purchase of securities (160).</p> <p>#324; For Role of Filer # position * should be left blank.</p>
	121 161	<p>If the Role of filer (121) is 1, you must not populate Subscription price of fund units/purchase price of securities (161).</p> <p>#324; For Role of Filer # position * should be left blank.</p>
	121 162	<p>If the Role of filer (121) is 1, you must not populate Purchase price of securities is known/is not known (162).</p> <p>#324; For Role of Filer # position * should be left blank.</p>
	121 163	<p>If the Role of filer (121) is 1, you must not populate Costs of fund unit subscription/ purchase of securities (163).</p> <p>#324; For Role of Filer # position * should be left blank.</p>
	121 164	<p>If the Role of filer (121) is 1, you must not populate Corporate action code (164).</p> <p>#324; For Role of Filer # position * should be left blank.</p>
	121 165	<p>If the Role of filer (121) is 1, you must not populate Purchase price and date are client-supplied (165).</p> <p>#324; For Role of Filer # position * should be left blank.</p>
	121 084	<p>If the Role of filer (121) is 2, the only permissible Purchase/Sale code (084) is 5.</p> <p>#322; For Role of Filer # permissible value(s): *</p>
	121 084	<p>If the Role of filer (121) is 3 or 4, the only permissible Purchase/Sale codes (084) are 2 and 6.</p> <p>#322; For Role of Filer # permissible value(s): *</p>
	121 127	<p>If the Role of filer (121) is 2, the only permissible Security Type Codes (127) are 05 are 55.</p> <p>#322; For Role of Filer # permissible value(s): *</p>
	121 127	<p>Filer Roles 1 and 3 cannot write 07 and 57 as Types of Securities.</p> <p>#887; Filer Roles 1 and 3 cannot write 07 and 57 as Types of Securities.</p>
	121 122 127	<p>If the Role of filer (121) is 3 or 4, and the Purchase/sale code is 6 (122), the only permissible Security Type Codes (127) are 01, 51, 42 and 82.</p> <p>#328; With purchase/sale code 6 (in position 22), the only permissible security type codes are 01 or 51 for share, and 42 or 82 for put option.</p>
	121 160	<p>If the Role of filer (121) is 2, 3 or 4, the Date of subscription of fund units / purchase of securities (160) is a required data element.</p>

		#323; For Role of Filer # mandatory data missing from position *
	121 161	If the Role of filer (121) is 2, 3 or 4, the Subscription price of fund units / purchase price of securities (161) is a required data element.  #323; For Role of Filer # mandatory data missing from position *
	121 162	If the Role of filer (121) is 2, you must not populate Purchase price of securities is known/is not known (162).  #324; For Role of Filer # position * should be left blank.
	121 164	If the Role of filer (121) is 2, you must not populate Corporate action code (164).  #324; For Role of Filer # position * should be left blank.
	121 165	If the Role of filer (121) is 2, you must not populate Purchase price and date are client-supplied (165).  #324; For Role of Filer # position * should be left blank.
	121 162	If the Role of filer (121) is 3 or 4, the Purchase price of securities is known/is not known (162) is a required data element.  #323; For Role of Filer # mandatory data missing from position *
	121 164	If the Role of filer (121) is 3 or 4, the Corporate action code (164) is a required data element.  #323; For Role of Filer # mandatory data missing from position *
	121 165	If the Role of filer (121) is 3 or 4, the Purchase price and date are client-supplied (165) is a required data element.  #323; For Role of Filer # mandatory data missing from position *
	161 162	If the value of Purchase price of securities is known (162) is 2, the Subscription price of fund units/Purchase price of securities (161) is a required data element (however, its value may be 0.00).  #1381; For Purchase price of securities is known (162) = 2, you must enter Subscription price of fund units/Purchase price of securities (161) also (the value 0.00 is permitted).
U	161 162	Purchase price of securities is known/is not known (162) is 1: you must not populate Subscription price of fund units/purchase price of securities (161).  #1357; Purchase price of securities is known/is not known (162) is 1: you must not populate Subscription price of fund units/purchase price of securities (161).
U	084 127	Together with the Purchase/sale code 5, the only permissible Security Type Codes (127) are 05 (fund units of investment funds) and 55 (shares in foreign UCITS).  #1358; Together with the Purchase/sale code 5, the only permissible Security Type Codes (127) are 05 (fund units of investment funds) and 55 (shares in foreign UCITS).
U	049	Transaction Code (049) is only required when Purchase/Sale (084) is 2 (a Sale) or 5 (Redemption of a share or a fund unit).  #1369; The 049 Transaction Code is only required when Purchase/Sale (084) is 2 (indicating a Sale) or 5 (a redemption of a share or a fund unit).

## 8 NOTIFICATIONS

Not applicable to this information flow.

## 9 SECURITY TYPE CODES

For reporting purposes, foreign securities have different codes than Finnish securities. Report the transactions at the Helsinki Stock Exchange as Finnish, other transactions as foreign.

Permissible values:

Finnish securities:

01 = shares  
02 = subscription rights for a new issue

03 = subscription rights for a bonus issue

04 = other derivative contracts

05 = fund units of an investment fund

06 = special subscription rights, listed options (including stock options related to an employment contract)

07 = bonds

08 = covered warrants

09 = index shares (ETF)

11 = domestic sales rights

41 = call options

42 = put options

43 = term contracts

44 = future contracts.

Foreign securities:

51 = shares

52 = subscription rights for a new issue

53 = subscription rights for a bonus issue

54 = other derivative contracts

55 = shares of a UCITS

56 = special subscription rights, listed option (including stock options related to an employment contract)

57 = bonds

58 = covered warrants

59 = shares of a UCITS (e.g. index share)

61 = foreign sales rights

81 = call options

82 = put options

83 = term contracts

84 = future contracts

99 = foreign securities, no exact description or details available.

For Roles 1 and 3, all of the above values (except 07 and 57) are permitted. For Role 4, all of the above values are permitted. For Role 2, values 05 and 55 only are permitted. Note that 07 and 57 are permitted for Role 4 only.

Use codes 41 to 44 to report Finnish derivative contracts traded in controlled markets. Report call and put options separately as follows: call options (code 41), put options (code 42). Similarly, use codes 81 to 84 to report foreign derivatives.

Use code 05 for Finnish fund units/shares, and code 55 for comparable shares of foreign undertakings for collective investment (UCITS). Enter the name of the fund under "Name of security" and the business ID (if any) of the management company under "Business ID of Management Company". Enter the business ID under "Intermediary's personal identity code / Business ID".

Finnish index-linked fund shares (ETF, Ex-change Traded Fund) are reported with the specific code 09, and correspondingly, comparable shares of exchange traded funds / UCITS from other countries (e.g. foreign index share) with code 59.

A Share Depository Receipt (FDR) issued for trading in the Finnish book-entry system is comparable with a Finnish basic share.

The primary means of reporting any security from another country is under the descriptive code relating to the type of security. Do not use code 99 except if you do not know the type of security.

## 10 COUNTRY CODES

All ISO3166 standard country codes are listed [here](#).

## 11 INSTRUCTIONS AND EXAMPLES

### 11.1 Reporting requirements of intermediaries in securities (Filer role 1)

An intermediary in securities transactions referred to in Investment Services Act, foreign service providers and other service providers within the meaning of the Act, an insurance company other than an employment pension institution referred to in Act on Insurance Companies, a representative office and the main agent within the meaning of the Act governing foreign insurance companies, and the agent referred to in the Act governing insurance associations, must deliver information to the Tax Administration. The relevant legal provisions are found in § 15.4, Act on Assessment Procedure, and § 30.1, Act governing transfer tax. The reporting requirement concerns both tax residents and tax nonresidents of Finland.

The requirement concerns: Purchase/sale of shares, share depository receipts, covered warrants, subscription rights, and units or shares in investment funds and mutual funds (undertakings for collective investment in transferable securities, UCITS). It also concerns derivatives traded in controlled markets, and derivatives referred to in Chapter 1, § 10 b, subsections 3 to 9 of Investment Services Act. In terms of the reporting requirement, it is of no significance whether the traded securities are domestic or foreign. In both cases, transactions traded for own account or for any third party must be reported. However, the reporting requirement is not applied to transactions with debt instruments. Sales or purchases of subscription/sell rights should be reported regardless of their amounts. Nevertheless, the reporting requirement is not applied to compensation up to €100 payable in connection with mergers, demergers and other arrangements within the meaning of § 52 to § 52c, and § 52f, of Act on the Taxation of Business Profits and Income from Professional Activities. If the

shares undergo a reverse share split within the meaning of Chapter 15, section 9, Companies Act, (*osakeyhtiölaki; aktiebolagslagen 624/2006*) and the company sells the surplus shares, and a payment to the shareholders is due, it does not have to be reported if its amount does not exceed €100.

Intermediaries in securities should give '1' as the value of position 10, Role of filer (= intermediary in securities transactions within the meaning of Investment Services Act, foreign provider of investment services and other providers referred to in the Act, insurance company within the meaning of the Act on Insurance Companies, a representative office within the meaning of the Act governing foreign insurance companies, and the main agent, and the agent who is referred to in the Act governing insurance associations).

Those concerned by the information-reporting requirement must deliver it to us and assume Filer Role 1 even if they, or a company of the same consolidated group, also file a report on sales using Filer Role 3. In this way, the same transactions generate two annual information returns (one for Role 1, the other for Role 3). If a disposition (**a sale**) is being reported using the new Role 4, the same sales transaction cannot be reported twice using Role 1. Nevertheless, it is mandatory to report all **purchase transactions** using Role 1.

The above filers (Role 1) are also expected to report the subscriptions/purchases and redemptions of mutual fund (UCITS) shares insofar as the branch in Finland — or the foreign company managing an investment fund established in Finland — has not reported them. For this type of reporting, give '2' as the value of position 10, Role of filer (= fund management company, Finnish branch of a foreign fund management company, or a foreign company managing an investment fund established in Finland).

See also 11.7 More instructions for reporting and differentiation (concerns filers representing role 1, role 3 or role 4) .

## 11.2 Reporting requirements of managements of funds (Filer role 2)

In situations where fund management companies, Finnish branches, or foreign companies managing an investment fund in Finland buy back, or redeem, any fund units of investment funds, mutual funds or UCITS. Now it also concerns managers of Alternative Investment Funds, who manage a special common fund under the provisions of Act on Common Funds. If an Alternative Investment Fund has been set up in Finland but it has a foreign manager, the information-reporting requirement also concerns the foreign manager in the same way as it concerns a Finnish manager of an Alternative Investment Fund (Finnish Government proposal for a legal statute no 94/2013).

In this connection, the management should report the purchase prices, purchase dates (acquisition prices and acquisition dates) and the collected subscription and redemption costs relating to any redeemed fund units, provided that this information is available. Actual purchase prices (or tax values in inheritance or gift taxation) should be reported, not the presumed acquisition costs. It is the job of the tax authority to calculate the presumed acquisition costs whenever necessary (in Finnish: *hankintameno-olettama*; in Swedish: *presumtiv anskaffningsutgift*).

In addition, fund management companies, branch offices in Finland or foreign companies managing an investment fund in Finland should notify the tax authority separately of the sum total of the taxable value and quantity of units held by a unit holder-taxpayer in an investment fund, mutual fund or UCITS, and yearly distributions of profits/yield, specifically for each fund, at the end of the calendar year (at 31 December). These facts are reported as shown in the data format specification VSTVERIE and VSTVVYHT: *Instructions on electronic information returns, as governed by Income Tax Act (TVL), concerning payments*

*of interest and aftermarket bonus, shares in investment funds, annual distributions on them, and shares in UCITS, and annual distributions on UCITS.* Give '2' as the value of position 10, Role of filer (= fund management company, Finnish branch, or a foreign company managing an investment fund established in Finland). To avoid double reporting of fund-unit buybacks or redemptions, the Tax Administration should receive no other annual information report in addition to that submitted as filer Role 2.

## **EXAMPLES OF HOW TO REPORT BUYBACK TRANSACTIONS:**

Example 1. Reporting a fund-unit buyback, showing correspondence with purchases.

Your client has first purchased "Investment Fund A" units as follows:

15 June 2014 100 units, €15 each, totals €1,500, paid fee €7.50.

15 Aug 2014 100 units, €17 each, totals €1,700, paid fee €8.50.

15 Oct 2014 50 units, €13 each, totals €650, paid fee €3.25.

Your investment company buys back all 250 units on 1 September 2016 for €14 per unit, total amount being €3,500.00 plus a fee of €35.00.

You must report the above transaction in three separate records, specifically for each acquired batch of fund units:

Purchase of 15 June 2014, reporting the buyback transaction:

(1) redemption price €1,400, transaction cost (fee) €14, date 1 Sep 2018, number of fund units 100, date of acquisition of fund units 15 June 2014, acquisition price €1,500, paid fee €7.50 for the original subscription;

Purchase of 15 August 2014, reporting the buyback transaction:

(2) redemption price €1,400, transaction cost (fee) €14, date 1 Sep 2018, number of fund units 100, date of acquisition of fund units 15 August 2014, acquisition price €1,700, paid fee €7.50 for the original subscription;

Purchase of 15 October 2014, reporting the buyback transaction:

(3) redemption price €700, transaction cost (fee) €7, date 1 Sep 2018, number of fund units 50, date of acquisition of fund units 15 October 2014, acquisition price €650, paid fee €3.25 for the original subscription;

The investment company must report the above information, including all other mandatory facts, in the format explained in this specification.

Example 2. FiFo reporting of a buyback, showing correspondence with purchases.

Your client has first purchased "Investment Fund A" units as follows:

15 June 2014 100 units, €15 each, totals €1,500, paid fee €7.50.

15 Aug 2014 100 units, €17 each, totals €1,700, paid fee €8.50.

15 Oct 2014 50 units, €13 each, totals €650, paid fee €3.25.

On 1 September 2016, your investment company buys back 120 units of "Investment Fund A", paying €14 per unit in redemption price, which totals €1,680.00 for 120 units redeemed. This transaction carries a fee of €16.80.

You must report the above transaction in two separate records, specifically for each acquired batch of fund units, and following the FiFo principle, showing the first purchased units as first sold:

(1) redemption price €1,400, transaction cost (fee) €14, date 1 Sep 2018, number of fund units 100, date of acquisition of fund units 15 June 2014, acquisition price €1,500, paid fee €7.50 for the original subscription;

(2) redemption price €280, transaction cost (fee) €2.80, date 1 Sep 2018, number of fund units 20, date of acquisition of fund units 15 August 2014, acquisition price €340, paid fee €1.70 for the original subscription;

The investment company should report the above information, including all other mandatory facts, in the format explained in this specification.

If it has been agreed that the buyback transaction concerns certain agreed batches of fund units (as registered in the book-entry system), the transaction may not follow the FiFo principle. In this case, the investment company must include full specification of each batch of securities, separated by their dates of acquisition.

### **11.3 Capital gains and capital losses (Filer role 3)**

The reporting requirement on facts and information for the purposes of capital-gains taxation: Credit institutions and branch offices within the meaning of the Act governing the business of credit institutions, investment service companies, including foreign investment service providers within the meaning of Investment Services Act, branch offices and account management companies or custodians within the meaning of the Act governing the book-entry securities system and its clearance operations, must give us information as outlined in this instruction and specification.

The reporting requirement concerns the selling of securities by natural persons and estates of deceased persons, both tax resident and tax nonresident in Finland. This information-reporting requirement is not intended as a limitation of any other information-reporting requirement of banks, investment service companies and other providers (Filer Role 1), such as the requirement to report the transactions in securities that they have brokered or carried out.

The requirement concerns: sales of shares, share depository receipts, covered warrants, subscription rights, and units or shares in investment funds and mutual funds (undertakings for collective investment in transferable securities, UCITS). It also concerns derivatives traded in controlled markets and derivatives referred to in Chapter 1, § 10, subsection 1:3-9 of Investment Services Act. In terms of the reporting requirement, it is of no significance whether the traded securities are domestic or foreign. In both cases, you must report the sales. However, the reporting requirement is not applied on sales of investment-fund shares or UCITS units, insofar as the fund management company delivers the relevant information pursuant to § 17.1 of Act on Assessment Procedure. Sales of debt instruments such as bonds are reportable with filer Role 4 (not Role 3). Sales or purchases of subscription/sell rights should be reported regardless of their amounts. Nevertheless, the reporting requirement does not concern compensation, up to €100, payable in conjunction with mergers, demergers and other arrangements within the meaning of § 52 to § 52c, and § 52f, of Act on the Taxation of Business Profits and Income from Professional Activities. If the shares undergo a 'reverse split' within the meaning of Chapter 15, section 9, Companies Act, (osakeyhtiölaki; aktiebolagslagen 624/2006) and the company sells the surplus shares, and a payment to the shareholders is due, it does not have to be reported if its amount does not exceed €100.

Report the selling price, selling date, costs collected for the sale, and the reference that identifies the sale (HEXClear, Infinity or some other Reference) and also the Transaction Code. Starting with the reporting for 2018, the Transaction Code is the filer's unique identifier of the transaction that facilitates differentiation between transactions closed on the same day, representing the same type, and having the same quantity. When you use both Role 1 and Role 3 to report the same sales transaction, you must use the same Reference in both reports. As a filer, you also must report the purchase price, purchase date and the costs relating to the purchase. If any type of corporate action, such as a split or a bonus issue have had an impact on the purchase price, or if the origin of the purchase-price information is the taxpayer himself, please report this as well. You must report the actual purchase prices (or tax values in inheritance or gift taxation), not the presumed acquisition costs. It is the job of the tax authority to calculate the presumed acquisition costs whenever necessary (in Finnish: *hankintameno-olettama*; in Swedish: *presumtiv anskaffningsutgift*).

As a filer fulfilling your information-reporting requirement, you must submit the facts and information about purchases and sales insofar as you have them in your possession. If you do not have all the necessary information for completing the capital-gains-tax computation in full (e.g. you do not know the historical purchase price of the security that has now been sold), however, you must submit any and all information that you have.

If your role as a filer has only consisted of being an account operator or custodian and the selling price is not known because of your limited responsibility, then Role 3 is in question, and there is no requirement to hand in an annual information return.

#### **11.4 Filer role 4 (Role used instead of role 3 in situations where the filer has fully ensured, to avoid double reporting, that the sales transaction will not be reported by any intermediary with role 1)**

Role 4 enables filers to submit only one filing to report **sales** transactions. The purpose of Role 4 is to facilitate calculation of capital gains and capital losses, because the filers can report the necessary information more simply.

Sales transactions reported using Role 4 should not be doubly covered by reporting them using Role 1 or Role 3. Intermediaries of securities (using Role 1) continue to have the full information-reporting requirement regarding all **purchases of securities**.

Use of Role 4 is only allowed in cases where the filer has been able to make sure that the sales transaction in question will not be doubly reported by an intermediary using Role 1. If the filer is unable to make sure of this, he must complete his filing using Role 3 as previously. The annual information regarding a single sales transaction can be submitted either using Role 3 or Role 4, but not both.

Use of Role 4 is based on a voluntary choice. This means that the filer can continue, as in previous reporting years, to use Role 3 to submit annual information on sales transactions. If Role 3 is used, the same transactions should also be reported using Role 1, as previously. In this way, the introduction of Role 4 does not absolutely require that existing report-generation systems be changed, if filers do not wish to make any changes.

Use of Role 4 to report sales transactions is wholly permitted even if the filer does not quite have all the necessary information for capital gains/capital losses calculation (e.g. no acquisition price information).

## 11.5 Reporting with filer role 4 to submit annual information on bonds

Filers must additionally include **sales and other transfers of bonds** (issued debt instruments) when reporting the facts necessary for computing the taxpayer's taxable amounts of capital gains, and similarly, deductible loss. The facts should be submitted fully to the extent that they are saved in such a format that permits information-reporting. Filers are expected to report sales of bonds even if they do not quite have all the necessary information for capital gains/capital losses calculation (e.g. no acquisition price information).

This information-reporting requirement concerns all bonds including interest-bearing bonds and index-linked bonds. Filers should use Filer Role 4. Sales and other dispositions of bonds are not reportable using the brokerage Role 1, intended for brokers/intermediaries of securities. Similarly, Role 3 is not suitable for the reporting of bonds sales.

## 11.6 Examples of reporting various sales transactions of securities:

Example 1. For the account of a taxpayer, the following entries have been made in the filer's books: Shares of Y Oy, to be kept safe or on a book-entry account: (1) In 2001, purchase of 100 shares for €200; (2) In 2004, bonus issue resulting in receipt of 200 shares, purchase price zero (no acquisition cost is attached to a share received through a bonus issue taking place before 1 January 2005); (3) Gift received in 2010 of 500 shares, accounting system has no record of gift-tax value.

Taxpayer sells off his 800 shares in 2016 in one single sale. The selling price is €10 per share. The filer is aware of the selling price.

For Roles 3 or 4, these sales should be reported in three separate records reflecting the actual acquisitions that took place. This should also include acquisition (3), even though the filer does not know the acquisition price.

The reporting should follow this model:

(1) Purchase price was €200.

321 - 335 = 200,00

336 = 0

(2) Purchase price was €0.

321 - 335 = 0,00

336 = 0

(3) Purchase price is not known.

321 - 335 = 0,00

336 = 1

(Role 1 is also required to report the sale. For Role 1, the entire sale can be reported as one single transaction, with no differentiation between various purchase prices and dates. Nevertheless, to avoid double reporting, Role 1 should not report the sale if the transaction gets reported by another filer using Role 4.)

Example 2. reporting separate acquisitions in connection with one sale In 2018 the taxpayer sells 1,000 units of stock in X Oy in one single sale. Historically, he purchased 400 of these units in 2012 in one single transaction and the remaining 600 units in 2014 also in one single transaction. For Role 3 or Role 4, you are

expected to show the sale of 400 units separately and the sale of the other 600 units separately, so as to report the single sale as two different sales.

At the same time, for Role 1, the entire sale can be reported as one single transaction, with no differentiation between various purchase prices and dates. Nevertheless, to avoid double reporting, Role 1 should not report the sale if the transaction gets reported by another filer using Role 4.

#### **11.7 More instructions for reporting and differentiation (concerns filers representing role 1, role 3 or role 4)**

**Sales transactions of securities can be reported using Role 4 in one single annual information return.**

##### *Selling securities*

It is not permissible that a single trading transaction result in more than **one annual information return** from the **same filer Role**, when this transaction is consummated by one taxpayer (one taxpayer being either the seller or the buyer). Example: Two intermediary companies participate in a trading transaction so that the taxpayer's Investment-Service Company engages the services of a Stock-Exchange Broker to sell a security. This cannot result in more than one annual information return from Role 1, and this return should show the taxpayer (the end client) as the seller. However, the Stock-Exchange Broker can in the above situation hand in an annual information return for the sale of the security, showing the Investment-Service Company as the seller, selling the security for the account of the client.

Role 1, Role 3 and Role 4 can report sales transactions of securities **separately for each transaction**. As an alternative to that, Role 1, Role 3 and Role 4 can report sales transactions of same type securities, based on the same client request, **separately for each brokerage request as ordered by client** with the restriction that each date should be shown separately, so that if one client request is being fulfilled during several consecutive days or dates, the relevant transactions should be reported **separately for each date**. The same Role must not report the same sale twice (for each transaction, and simultaneously, for each brokerage request), but sales of different securities can be reported in two different ways (for each transaction, or alternatively, for each brokerage request).

Filers representing Role 1 and Role 3 should coordinate their filings in order to report the same sale in the same way (for each transaction, or alternatively, for each brokerage request), if the filers are aware of each others' reporting (this situation would occur when an Intermediary Company (Role 1) and an Investment-Service Company/Custodian (Role 3) belong to the same consolidated group of companies).

If sales transactions have been reported using Role 4, the same sales transactions should not be reported doubly in any annual information return using Role 1 or Role 3.

##### Example 3. reporting sales **separately for each transaction**

Taxpayer asks broker to sell 1000 shares of X Oy. Historically, taxpayer has purchased all the shares at the same time, as one batch. However, this sale request will be realizable on 8 October 2018 in three transactions: (1) 200 shares sold for €3,040 (€15.20 per share); (2) 300 shares sold for €4,566 (€15.22 per share); (3) 500 shares sold for €7,620 (€15.24 per share).

The filing is made separately for each transaction, so both Role 1 and Role 3 must each hand in three records, where every transaction is reported separately for each time when a sale takes place: (1) Sale 200 X Oy, sale date 08102016, selling price €3,040, (2) Sale 300 X Oy, date 08102016, selling price €4,566; (3)

Sale 500 X Oy, date 08102016, selling price €7,620, complete with the other relevant information as listed in this Specification as required of each filer Role.

When reporting sales separately for each transaction using Role 4, each transaction should result in just one annual information return filing to the Tax Administration. This means that Role 4 is expected to file three inbound records to report each transaction as follows:

(1) Sale 200 X Oy, date 08102018, selling price €3,040, (2) Sale 300 X Oy, date 08102018, selling price €4,566; (3) Sale 500 X Oy, date 08102018, selling price €7,620, complete with the other relevant information as listed in this Specification as required of filer Role 4.

**Example 4. reporting sales **separately for each brokerage request as ordered by client****

Taxpayer asks broker to sell 1000 shares of X Oy. Historically, taxpayer has purchased all the shares at the same time, as one batch. However, this sale request will be realizable on 8 October 2018 in three transactions: (1) 200 shares sold for €3,040 (€15.20 per share); (2) 300 shares sold for €4,566 (€15.22 per share); (3) 500 shares sold for €7,620 (€15.24 per share).

The filing is made separately for each brokerage request, so both Role 1 and Role 3 will each hand in one record, where the information is as follows: Sale 1000 X Oy, sale date 08102018, selling price €15,226, complete with the other relevant information as listed in this Specification as required of each filer Role.

When reporting sales separately for each brokerage request, using Role 4, send just one inbound annual information return filing to the Tax Administration. This means that Role 4 is expected to file an inbound record as follows: Sale 1000 X Oy, sale date 08102018, selling price €15,226, complete with the other relevant information as listed in this Specification as required of filer Role 4.

As noted above, when filings are made separately for each brokerage request as ordered by client, **every date when transactions take place must be reported separately**, although the same client request is being fulfilled and the fulfillment is taking several days.

**Example 5. reporting sales, **taking place during several dates, separately for each brokerage request** as ordered by client**

Taxpayer asks broker to sell 1000 shares of X Oy. Historically, taxpayer has purchased all the shares at the same time, as one batch. However, this sale request will be realizable on 8 October 2018 and 9 October 2016 in three transactions:

(1) 200 shares sold for €3,040 (€15.20 per share) on 8 Oct 2016

(2) 600 shares sold for €9,132 (€15.22 per share) on 8 Oct 2016

(3) 200 shares sold for €3,048 (€15.24 per share) on 9 Oct 2016.

Both Role 1 and Role 3 will each hand in two records showing: (1) Sale 800 X Oy, sale date 08102015, selling price €12,172; (2) Sale 200 X Oy, sale date 09102015, selling price €3,048, complete with the other relevant information as listed in this Specification as required of each filer Role.

When reporting sales on several dates separately for each brokerage request, using Role 4, send just one inbound annual information return filing to the Tax Administration:

Role 4 is expected to file two records as follows: (1) Sale 800 X Oy, sale date 08102018, selling price €12,172; (2) Sale 200 X Oy, sale date 09102016, selling

price €3,048, complete with the other relevant information as listed in this Specification as required of filer Role 4.

If the securities were historically acquired in several batches, Role 3 should differentiate the sale so as to show this, both when **separately for each transaction** principle and **separately for each request** principle are being followed.

**Example 6. differentiation by batches of acquired securities** when reporting sales of securities **separately for each transaction**

Taxpayer asks broker to sell 1000 shares of X Oy. Historically, taxpayer has purchased the shares in two separate purchase transactions: First 1 April 2012, 400 shares for €12 per share, then 1 June 2014, 600 shares for €15 per share. Broker sells these shares on 8 October 2018 in the following manner: (1) sale of 200 shares for €3,040 (€15.20 per share); (2) sale of 300 shares for €4,566 (€15.22 per share); (3) sale of 500 shares for €7,620 (€15.24 per share).

The filer, using Role 3, hands in records showing differentiation by batches of acquired securities, and reporting sales of securities separately for each transaction: (1) sale 200 X Oy, sale date 08102018, selling price €3,040, acquisition price €2,400, acquisition date 01042012; (2) sale 200 X Oy, sale date 08102018, selling price €3,044, acquisition price €2,400, acquisition date 01042012; (3) sale 100 X Oy, sale date 08102018, selling price €1,522, acquisition price €1,500, acquisition date 01062014; (4) sale 500 X Oy, sale date 08102018, selling price €7,620, acquisition price €7,500, acquisition date 01062014, complete with the other relevant information as listed in this Specification as required of filer Role 3.

(Whereas Role 1 can simply report the sales separately for each transaction, with no differentiation as to acquisitions: (1) sale 200 X Oy (2) sale 300 X Oy; (3) sale 500 X Oy.)

When reporting this transaction using Role 4, send just one inbound annual information return: Role 4's filing should be the following, showing differentiation by batches of acquired securities, and reporting sales of securities separately for each transaction: (1) Sale 200 X Oy, sale date 08102018, selling price €3,040, acquisition price €2,400, acquisition date 01042012; (2) sale 200 X Oy, sale date 08102018, selling price €3,044, acquisition price €2,400, acquisition date 01042012; (3) sale 100 X Oy, sale date 08102018, selling price €1,522, acquisition price €1,500, acquisition date 01062014; (4) sale 500 X Oy, sale date 08102018, selling price €7,620, acquisition price €7,500, acquisition date 01062014, complete with the other relevant information as listed in this Specification as required of filer Role 4.

**Example 7. differentiation by batches of acquired securities** when reporting sales of securities **separately for each request**

Taxpayer asks broker to sell 1000 shares of X Oy. Historically, taxpayer has purchased the shares in two separate purchase transactions: First 1 April 2012, 400 shares for €12 per share, then 1 June 2014, 600 shares for €15 per share. Broker sells these shares within one day, 8 October 2016, in the following manner: (1) sale of 200 shares for €3,040 (€15.20 per share); (2) sale of 300 shares for €4,566 (€15.22 per share); (3) sale of 500 shares for €7,620 (€15.24 per share).

The filer, using Role 3, hands in records relating to the client request as follows: (1) Sale 400 X Oy, sale date 08102018, selling price €6,090.40, acquisition price €4,800, acquisition date 01042012; (2) Sale 600 X Oy, sale date 08102018, selling price €9,135.60, acquisition price €9,000, acquisition date 01062014,

complete with the other relevant information as listed in this Specification as required of filer Role 3.

(Whereas Role 1 can simply report the sales relating to the client request, with no differentiation as to acquisitions: Sale 1,000 X Oy).

When reporting this transaction using Role 4, send just one inbound annual information return: Role 4's filing should be the following: (1) Sale 400 X Oy, sale date 08102018, selling price €6,090.40, acquisition price €4,800, acquisition date 01042012; (2) Sale 600 X Oy, sale date 08102018, selling price €9,135.60, acquisition price €9,000, acquisition date 01062014, complete with the other relevant information as listed in this Specification as required of filer Role 4.

Both Role 1 and Role 3 must include a Reference in pos. 350-384 to show each sale as a separate, identifiable transaction. Tax Administration will use the Reference for making sure that tax only is collected once on one sale, taking account of the information returns received from both Role 1 and Role 3.

For Reference, you must enter a HEXClear, Infinity Matching or other reference. For Role 4, the Reference is not required.

HEXClear is used by Helsinki Stock Exchange to identify transactions (known as "1-kaupat"). In 2018, there will be an IT system update after which the Infinity Matching Reference will be in use. HEXClear may also be used in transfers to or from brokerage accounts (known as "HEXClear 5 transactions"). Other reference is any other 35-character string (alphanumeric, max. 35 chars) that filers can utilize and include in their return.

Sales, reported per transactions, that include a HEXClear/Infinity (having taken place at Helsinki Stock Exchange), must simply be identified using the HEXClear/Infinity as the Reference, provided that the filer knows it. Sales that do not have a HEXClear/Infinity at all (foreign or other sales outside of the HEXClear/Infinity reference framework) or sales that do have a HEXClear/Infinity but the filer does not know it, may include some other Reference in the reporting.

Sales reported by each brokerage request must be identified by other Reference. Sales that have taken place on the brokerage account can be identified by their HEXClear Reference (known as the "HEXClear 5 transactions").

Both Role 1 and Role 3 must use the same Reference to identify the same sale (one of the following two alternatives: the same HEXClear/Infinity or the same Other Reference), if it is known to the filer of either Role what the other Role is using (this situation would occur when an Intermediary Company (Role 1) and an Investment-Service Company/Custodian (Role 3) belong to the same consolidated group of companies).

In situations where Role 3 is expected to report the sales separately for each acquired batch of securities (as explained above in Example 6 and Example 7), Role 3 must use the same reference (the same HEXClear/Infinity or the same other reference) to identify the all sales of the batches, and correspondingly, Role 1 must use the same reference as Role 3 is using.

### **Purchasing securities**

Role 1 can report purchases separately for each transaction, or separately for each request. With the latter alternative it is always required that all the day's finalized transactions must be reported date-for-date. Regarding purchases, use of HEXClear/Infinity or other reference is permissible but not mandatory.

Roles 3 and 4 are not expected to file an annual information return regarding purchases.

## **Reporting acquisition prices and expenses, including the effect of any corporate actions that have taken place**

Role 3 and Role 4 are required to report acquisition prices and relevant expenses in the annual information report concerning sales of securities. These amounts should be reported so as to show the effect or correction brought about by corporate action, if this has happened. Examples of corporate action are: split, reverse split, issue of shares, and mergers.

### Example 8.

Taxpayer has purchased 100 shares of N Oy in January 2012. The price was €4,000 (€40 per share) and the broker's fee was €40. In April 2012, N Oy made a split of shares (as 1:4). As a result, taxpayer holds 400 shares of N Oy.

In 2018, taxpayer sells 150 shares of N Oy in one single sale. Thus, filer Role 3 is required to report acquisition prices and relevant expenses in the annual information report as follows: €1,500 ( $150/400 * €4,000$ ) and €15 as the broker's fee ( $150/400 * €40$ ).

## **11.8 Reporting monetary values**

If transaction currency is entered as a foreign currency and the currency of payment was a non-euro currency, you must convert it into € using the ECB rate valid at the date of payment.

## **11.9 Quantity of units sold/purchased/redeemed**

Use 6 decimals.

Examples: For the quantity of 1500 units, write 1500,000000 and for 0.765 units, write 0,765000.

In the case of bonds (filer Role 4, security type codes 07 or 57) give the nominal value of the loan at the date of issue in an unspecified currency. Thus, for GBP 9,999, write 9999,000000.

## **11.10 Additional information**

If the personal Identity Code/Business ID of the buyer/seller/redeemer is not known, this field is for any other particulars (such as Name, Address, Country code) that have not been submitted earlier.

The entries in the "Additional information" are forwarded to the Tax Administration's reception of annual information returns; however, they are not used for purposes of tax assessment. The field is intended for all Filer Roles: 1, 2, 3 and 4.

## **11.11 Purchase price and date are client-supplied**

Value 1 refers to situations where the taxpayer himself has written the purchase price and date information in the service company's software system or to situations where the service company has relied on taxpayer-supplied information without confirming these facts from documents.

Value 2 refers to situations where the service company, not the taxpayer, has been responsible for data input regarding purchase. You can also use value 2 (price information not client-supplied) when sufficient checks based on documentation have been made to confirm the purchase information originally written by the taxpayer.

Value 3 above to situations where there is no knowledge as to the origin of the purchase information, or similarly, no know-ledge as to whether documentation has been used for confirming the purchase prices and dates.

#### **11.12 Transaction code**

This code is useful when making corrections to the annual information return on securities trading and also for purposes of tax assessment. Filers should use it in order to differentiate between their transactions closed on the same day with same types of securities and with same quantities purchased or sold.