

Protocol on the filing of annual accounts and consolidated annual accounts in PDF format

Version 3.0



National Bank of Belgium, Brussels

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Foreword

The “Protocol on the filing of annual accounts and consolidated annual accounts in PDF format” (hereinafter referred to as the “PDF Protocol”) is addressed to persons that wish to file annual accounts by electronic means with the Central Balance Sheet Office of the National Bank of Belgium (NBB) in the form of a portable document format (PDF) file.

Version 3.0 of this document describes the requirements that annual accounts in PDF format must meet **as from 4 April 2022**. If the accounts do not comply with the version of the PDF Protocol in force at the time of filing, they will be rejected by the NBB.

Questions of a technical nature may be sent to the NBB by post (National Bank of Belgium, Contact Centre - Service CL, 14 Boulevard de Berlaimont, 1000 Brussels) or e-mail (helpdesk.ba@nbb.be).

Table of Contents

Foreword	3
Introduction	5
1. Production of a PDF file	6
2. Submission of a PDF file	7
3. Formal requirements for the acceptance of annual accounts filed in PDF format	8
3.1 General requirements for acceptance	8
3.2 Specific requirements for acceptance	9
4. Technical requirements for the acceptance of annual accounts filed in PDF format	10
4.1 Requirements relating to the properties of the PDF file	10
4.2 Requirements relating to the features integrated into the PDF file	11
4.2.1 Accepted features	11
4.2.2 Rejected features	12
List of acronyms	16
List of examples	17

Introduction

Pursuant to Directive 2009/101/EC,¹ companies and other legal entities required to publish their annual accounts must be able to file them by electronic means.

The following can be filed with the NBB in PDF format:

- **standard annual accounts for companies, associations and foundations;**
- **non-standard annual accounts for companies, associations and foundations as well as consolidated annual accounts;**
- **the annual accounts of health insurance funds and national federations of health insurance funds.**

The NBB reserves the right to modify the PDF Protocol at any time. Users will be informed of this fact via the Bank's website.

¹ Directive 2009/101/EC of the European Parliament and of the Council of 16 September 2009 on coordination of safeguards which, for the protection of the interests of members and third parties, are required by Member States of companies within the meaning of the second paragraph of Article 48 of the Treaty, with a view to making such safeguards equivalent.

1. Production of a PDF file

A PDF file can be created by:

- converting an electronic document into a PDF;²
- scanning paper documents, preferably in text format, into a PDF file;
- grouping together several PDFs created by one of the abovementioned methods.

² Specific programs or modules provided with accounting software can be used for this purpose.

2. Submission of a PDF file

The procedure for the filing of annual accounts in PDF format with the Central Balance Sheet Office is described in the “General protocol on the electronic filing of annual accounts and consolidated annual accounts”, available on the NBB’s website.

It is important to note that an annual accounts file submitted in PDF format is always reproduced in its **entirety**. This means that any documents mistakenly appended to the PDF file (e.g. cover letter, social balance sheet for the branch of a foreign company or tax documents) will also be published if they meet the conditions for acceptance. It is therefore up to the company, association or foundation to ensure that the information transmitted in the PDF file is relevant and not protected by confidentiality rules.

3. Formal requirements for the acceptance of annual accounts filed in PDF format

Annual accounts or consolidated annual accounts filed in PDF format are subjected to formal checks before being accepted by the NBB. These may be general checks applicable regardless of the filing format or checks of specific requirements applicable to annual accounts or consolidated annual accounts filed in PDF format.

It is however impossible to check automatically whether annual accounts or consolidated annual accounts filed in PDF format meet all formal requirements for acceptance. The accounts may therefore be rejected during the visual check, after the PDF file has been uploaded to the NBB's electronic filing application "Filing". In this case, the filer will be informed of the reasons for rejection of the annual or the consolidated annual accounts.

3.1 General requirements for acceptance

The information contained in the PDF file must relate to:

- **annual accounts** and other documents to be filed with the NBB pursuant to Articles 3:10, 3:12 §1, 3:20 §1, 3:47 §7 and 3:51 §7 of the Code of Companies and Associations or other statutory or regulatory provisions;
- **consolidated annual accounts** and other documents required to be filed with the NBB pursuant to Articles 3:35 and 3:36 of the Code of Companies and Associations or other statutory or regulatory provisions;
- **annual accounts** and other documents required to be filed with the NBB pursuant to Articles 3:47 and 3:51 of the Code of Companies and Associations or other statutory or regulatory provisions.

In order to be accepted, the annual accounts or consolidated annual accounts must include the following items of information:³

- the name of the legal entity as it appears in its articles of association on the filing date;
- the corporate form of the legal entity on the filing date, along with the mention "in liquidation" where appropriate;
- the registered office address (street name and number, box number (if any), postal code, municipality, country) on the filing date;
- the enterprise number;
- the term "register of legal entities" or the abbreviation RLE, followed by an indication of the judicial district within which the entity's registered office is located;
- the opening and closing dates of the financial year to which the annual accounts or consolidated annual accounts relate;
- for an enterprise, the type of publication:⁴ annual accounts or consolidated annual accounts;
- the multiple ("thousands" or "millions") in which amounts are expressed when they are not given in units (e.g. for consolidated annual accounts);
- the currency in which the amounts indicated in the annual accounts or consolidated annual accounts are expressed when these are denominated in a currency other than the euro (for example, for consolidated annual accounts drawn up in the currency of an OECD Member State).

In addition, annual accounts or consolidated annual accounts and other documents that make up a single filing must be drawn up:

- in one and the same language, with the exception of the annual accounts of health insurance funds relating to regional insurance;

³ Article 3:67 of the Royal Decree of 30 April 2019 implementing the Code of Companies and Associations.

⁴ Associations and foundations file annual accounts only.

- in accordance with the full, abridged or micro model of annual accounts for companies or in accordance with the full, abridged or micro model of annual accounts for associations and foundations in effect and published by the NBB, if the company, association or foundation is required to file its annual accounts using a standard model;
- using the “specific cover sheet” containing Sections 1, 2.1 and 2.2 of the full or abridged model of annual accounts for companies, if the company is authorised to file its annual or consolidated annual accounts in accordance with a specific model;
- using the “specific cover sheet” containing Sections 1, 2.1 and 2 for the annual accounts of associations drawn up in accordance with a derogation granted by the NBB, if the association or foundation is authorised to file its annual accounts in accordance with a specific model;
- using the “specific cover sheet” containing Sections 1 and 2.1 of the model for annual accounts of health insurance funds and national federations of health insurance funds relating to supplementary insurance or compulsory regional insurance;⁵
- using the “specific cover sheet” containing Sections 1, 2.1 and 2.2 for the annual accounts of foreign companies, associations and foundations;
- using the model of the statement of assets and liabilities for migrating companies.

Standard annual accounts must also satisfy the statutory checks defined in the *Moniteur Belge/Belgisch Staatsblad*.

3.2 Specific requirements for acceptance

Each set of annual accounts or consolidated annual accounts should form the object of a separate PDF file and must be uploaded separately.⁶ In other words, the inclusion of several sets of annual accounts in a single file is not permitted.

The printout of the PDF submitted for filing, in black ink on white A4 paper, must also meet the following formal requirements:⁷

- a minimum **margin** of one centimeter on each page;
- a minimum **top margin** of at least two centimeters on the first page;
- the abbreviation of the model used in the top right-hand corner of the first page;
- the **enterprise number** of the legal entity at the top of each page;
- **no handwritten data** other than the signature;
- **legible and clear data** with characters of sufficient size and sufficient contrast between the data and the background;
- for a corrected filing, the mention “Modification” on the first page.

⁵ Health insurance funds and national federations of health insurance funds subject to the Act of 6 August 1990 are required to draw up their annual accounts in accordance with the model laid down by the Office for the Oversight of Health Insurance Funds and National Federations of Health Insurance Funds.

⁶ Article 3:69 §3 of the Royal Decree of 30 April 2019 implementing the Code of Companies and Associations.

⁷ Articles 3:69 §2 and 3:73 of the Royal Decree of 30 April 2019 implementing the Code of Companies and Associations.

4. Technical requirements for the acceptance of annual accounts filed in PDF format

Images of annual accounts or consolidated annual accounts are published as filed. Files in PDF format must meet a certain number of technical requirements in order to be accepted.⁸

Not all technical requirements can be checked automatically when a file is uploaded in PDF format to the Filing application. Further processing of the file is thus deferred in order to carry out a visual quality check, which may take an entire working day.

4.1 Requirements relating to the properties of the PDF file

In order to be accepted by the NBB, the PDF file must meet the following requirements:

- have the **extension** “pdf”;
- be a PDF file **recognised by Acrobat Reader**; “fake” pdf files, where the extension has been changed to “pdf”, will not be accepted;
- **must not be compressed**;
- may include only numbers, spaces, the symbols “.”, “-“ and “_” and unaccented letters of the alphabet in the file **path** and **name**; all other symbols, such as “&”, “@” and “/” are therefore prohibited;
- contain only pages in **A4** format with **portrait orientation** (21 cm x 29.7 cm); for non-standard models of annual accounts, certain pages in **A4 format with landscape orientation** (29.7 cm x 21 cm) are acceptable insofar as this makes the data (mainly tables) easier to read (this exception does not apply to the first page).

The **maximum size** of a PDF file is **restricted** to 50 MB.

⁸ Article 3:69 §3 of the Royal Decree of 30 April 2019 implementing the Code of Companies and Associations.

4.2 Requirements relating to the features integrated into the PDF file

Certain features can be integrated into a PDF file. Some of these are accepted in annual accounts filed with the NBB, while others are rejected.

4.2.1 Accepted features

- **Bookmarks:** Bookmarks facilitate navigation through a document using reference points and are grouped together in a table of contents. They generally correspond to the main sections of a document (see Example 1). Since they have no influence on the presentation or printing of the document, bookmarks are accepted.

Example 1 - Bookmarks

The screenshot shows a web browser window displaying a PDF document. On the left, a table of contents is visible, with the following items circled in red:

- Banque nationale de Belgique 2013
- C1.1 Comptes annuels en milliers d'euros
- Annexe 1 - Liste des administrateurs, gérants et commissaires
- Annexe 2 - La Banque nationale de Belgique société anonyme
- Annexe 3 - Dettes et subsides
- Annexe 4 - Rapport d'entreprise
- Rapport 2013
- 2. Comptes annuels et rapports relatifs à l'exercice
- 2.1 Rapport de gestion
- 2.2 Comptes annuels
- 2.2.1 Bilan
- 2.2.2 Compte de résultats
- 2.2.3 Répartition du bénéfice
- 2.2.4 Dividende par action
- 2.2.5 Postes hors bilan
- 2.2.6 Bilan social
- 2.2.7 Commentaires relatifs aux comptes annuels
- 2.2.8 Comparaison sur cinq ans
- 2.3 Rapport du réviseur d'entreprises au Conseil de régence
- 2.4 Approbation du Conseil de régence

The main content of the PDF is a form titled 'COMPTES ANNUELS EN MILLIERS D'EUROS' for 'Banque nationale de Belgique'. The form includes the following information:

10	24/04/2014	BE 0203.201.340	59	EUR		
NAT.	Date du dépôt	N°	P.	D.	14100.00237	C 1.1

DENOMINATION: Banque nationale de Belgique - Nationale Bank van België - Belgische Nationalbank

Forme juridique: société anonyme

Adresse: boulevard de Berlaimont N°: 14 Bte:

Code postal: 1000 Commune: Bruxelles

Registre des personnes morales (RPM) - Tribunal de commerce de Bruxelles

Adresse Internet*: http://www.nbb.be

Numéro d'entreprise: 0203.201.340

DATE: 22/09/2011 du dépôt de l'acte constitutif OU du document le plus récent mentionnant la date de publication des actes constitutif et modificatif(s) des statuts.

COMPTES ANNUELS approuvés par le Conseil de Régence du 26/03/2014

et relatifs à l'exercice couvrant la période du 01/01/2013 au 31/12/2013

Exercice précédent du 01/01/2012 au 31/12/2012

Les montants relatifs à l'exercice précédent sont identiques à ceux publiés antérieurement.

LISTE COMPLETE avec nom, prénoms, profession, domicile (adresse, numéro, code postal et commune) et fonction au sein de l'entreprise des ADMINISTRATEURS, GERANTS ET COMMISSAIRES: voir annexe 1

Nombre total de pages déposées: 59

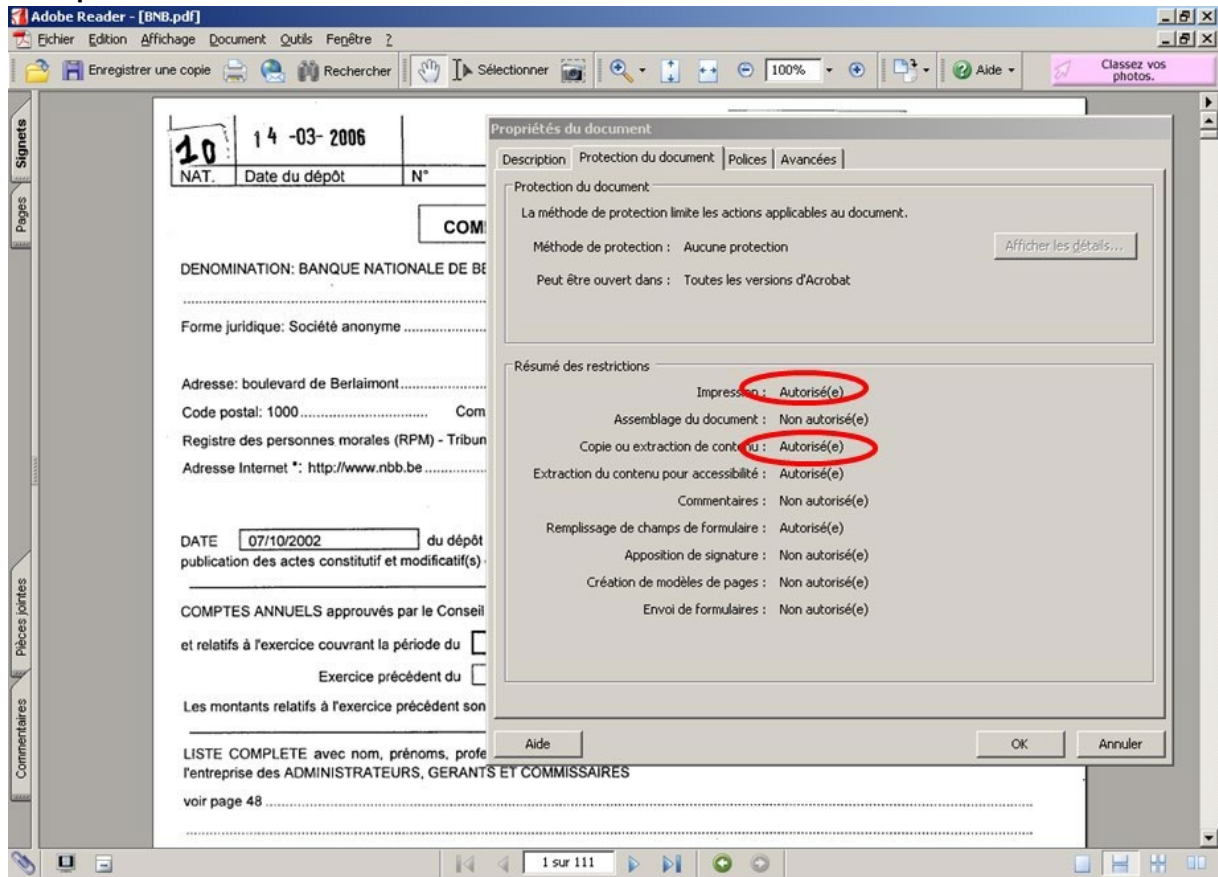
Le Gouverneur,

- **Articles:** The article feature can be used to organise text into columns spanning several pages, such as in a magazine or newspaper article. This avoids the need for the reader to continually scroll or enlarge pages on the screen. Since they have no bearing on the presentation or printing of the document, articles are accepted.
- **Links:** In a PDF, links function in the same way as on a website. When the reader clicks on a link, they are directed to another part of the document, another document or even a website. Since links have no bearing on the presentation or printing of the document and provide additional information about the annual accounts, they are accepted. It should be noted that the text of the link must be clearly legible (the characters must be of a sufficient size and there must be sufficient contrast between the text and the background).

4.2.2 Rejected features

- **Passwords:** A PDF document can be password protected to prevent it from being opened, printed or modified (see Example 2). Since it must, for obvious reasons, be possible to open, modify and print annual accounts filed in PDF format, the use of passwords is prohibited.

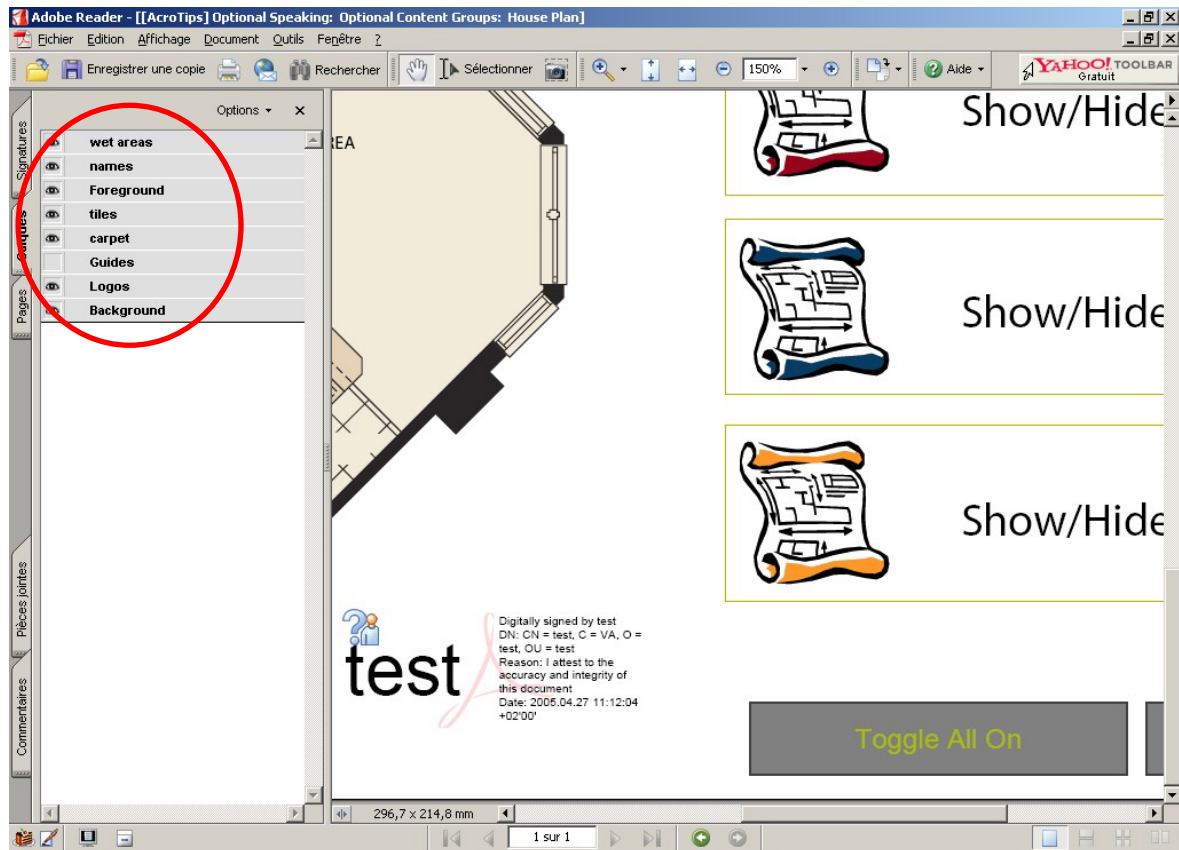
Example 2 - Passwords



- **JavaScript:** A PDF file may contain JavaScript. This is a programming language used to create interactive objects, such as animations or shapes. For security reasons, PDF filings with the NBB may not contain JavaScript.
- **Tags:** A PDF file can contain tags. These include additional data relating to the file and enable it to be classified and indexed (on the basis of a keyword). The use of tags is prohibited.

Layers: Layers, also known as optional content groups (OCG), can be used to create PDF documents in several layers which can be viewed on demand, like superimposed slides (see Example 3). Insofar as there is no indication of which layers are official or how they are to be displayed, the use of layers is prohibited.

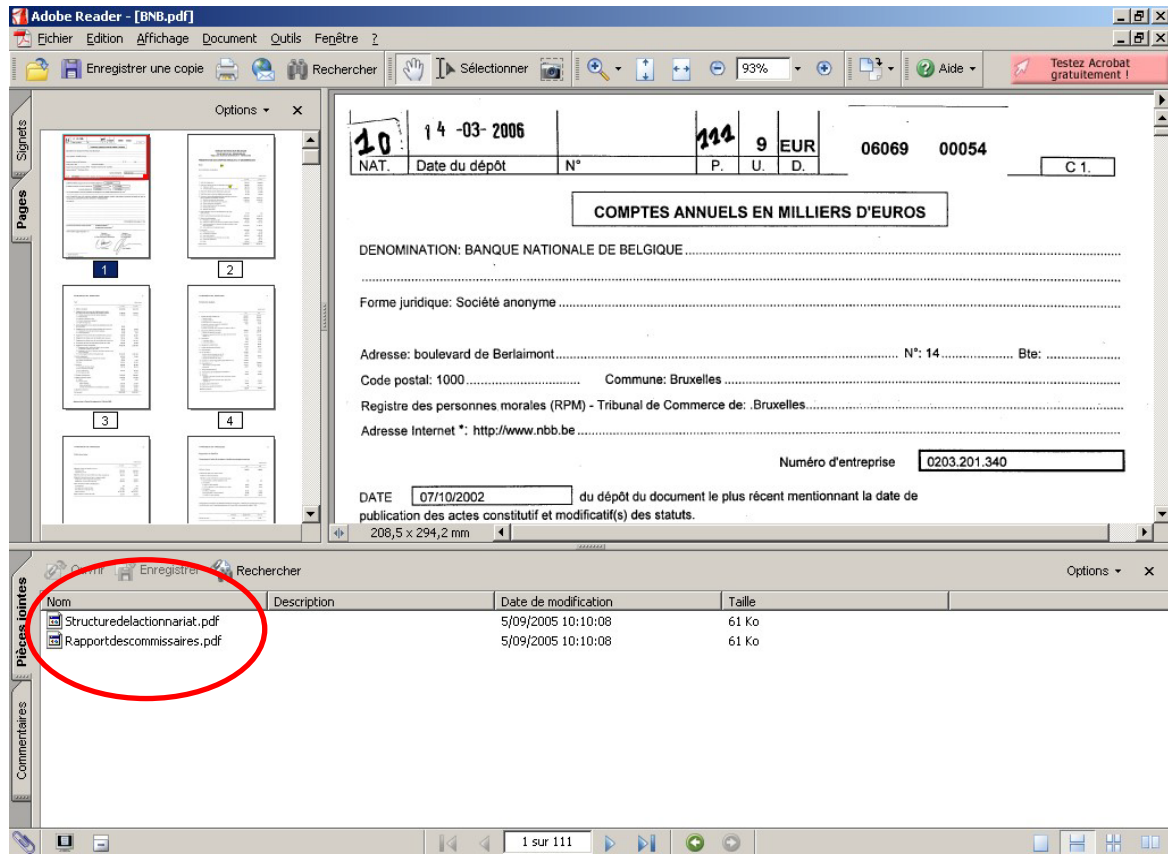
Example 3 - Layers



- **Multimedia data:** All information contained in the PDF file must be able to be printed at the request of any interested party. As multimedia data cannot be reproduced on paper, the inclusion of audio files, video files or 3D models in annual accounts filed in PDF format is not permitted.

Attachments: PDF files sometimes include one or more **attachments** (see Example 4). In order to avoid questions as to whether attached files should be published, the inclusion of attachments is prohibited. This rule also applies to “PDF portfolios”, i.e. a PDF file including several types of files.

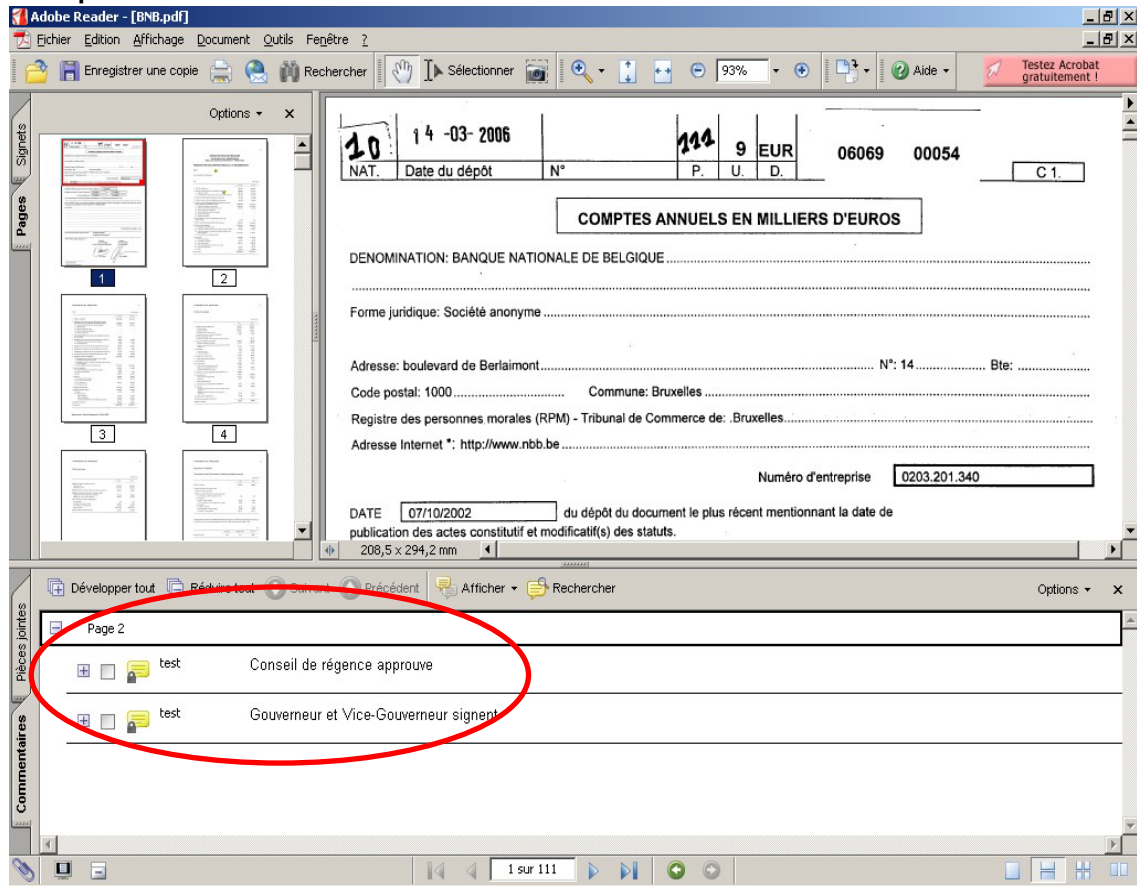
Example 4 - Attachments



Comments: It is technically possible to add comments to a PDF. These do not appear in the text itself but rather are graphic elements which, like a sticky note, are added to the annual accounts in

PDF format (see Example 5). In order to avoid discussion as to whether comments should be published, the inclusion of comments is prohibited.

Example 5 - Comments



List of acronyms

NBB	National Bank of Belgium
EC	European Community
MB	Megabyte
OCG	Optional content group
PDF	Portable document format
RLE	Register of legal entities
XBRL	eXtensible Business Reporting Language

List of examples

Example 1: Bookmarks	12
Example 2: Passwords	13
Example 3: Layers	14
Example 4: Attachments	15
Example 5: Comments	16

For further information on the content, methodology, calculation methods and sources used, please contact the Contact Centre - Data Collection Unit (CL) of the National Bank of Belgium.

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