



ORFIUM MUSIC RIGHTS | GREECE

Independent Management Entity

Distribution Rules

2022 version 1

1. Introduction

ORFIUM MUSIC RIGHTS | GREECE is an Independent Management Entity (IME) according to the definition of the European Directive 2014/26 (the “Directive”), a privately owned, for-profit organization which is contractually authorized by rightsholders to manage copyright of musical compositions on behalf of more than one rightsholder for the collective benefit of those rightsholders as its sole or main purpose, and its operation is regulated by the Directive as implemented by Greek collective management law 4481/2017 and by Greek corporate ‘Societe Anonyme’ law 4548/2018.

ORFIUM MUSIC RIGHTS | GREECE operates by virtue of a ministerial act issued by the Ministry of Culture and Sports [10/2/2022, #56338] following a written recommendation from the Greek Copyright Office's BoD (Organismos Pneumatikis Idioktisis - O.P.I.) and is regulated by OPI, according to its governing documents, including this Distribution Plan, agreements with rightsholders, as well as applicable copyright law, International Conventions, and Industry bodies’ regulations (such as CISAC’s regulations). The purpose of this document is to provide an overview of ORFIUM MUSIC RIGHTS | GREECE’s policies and procedures for managing copyright of musical compositions.

2. Documentation

Copyright data for each rightsholder shall be maintained at the Work level by rights type, time period, and territory. All ORFIUM MUSIC RIGHTS | GREECE’s systems can process both Greek and English language characters.

2.1. Works Registration

Rightsholders may register their Work’s through either the online portal or via SFTP using any common digital supply chain format for bulk registration, including all current CISAC approved versions of CWR (presently v2.2, v3.0 and v3.1).

2.2. Copyright Registration Reconciliation

The goal of the copyright registration reconciliation process is to accurately organize Work data in order to facilitate royalty processing. ORFIUM MUSIC RIGHTS | GREECE maintains a database of rightsholders’ Works so that the corresponding Works can be matched to usage reports and the royalty amounts associated with each Work’s respective usage can be appropriately allocated to the interested parties’ Share on each Work and paid accordingly.

2.2.1. Authority Score and Reconciliation Score

With data being submitted by multiple rightsholders who provide both information on their Work Shares as well as on the Work Shares of other rightsholders, ORFIUM MUSIC RIGHTS | GREECE uses a weighting system (authority and reconciliation scoring) to mitigate inconsistencies in the copyright registration reconciliation process.

The authority score is a value assigned to each data point submitted and is based on the proximity of the submitter to the authoritative source of the information. Data pertaining to a rightsholder and



submitted directly by such rightsholder is scored higher than data pertaining to a rightsholder and submitted by different rightsholder. Information with a higher authority score will be considered more authoritative over information with a lower authority score. The authority score will not be a determining factor for resolving Works in dispute nor any subsequent Counterclaims.

The reconciliation score is a value assigned to each rights type for each Work and signifies the completeness of data ORFIUM MUSIC RIGHTS | GREECE has received for a given Work. The reconciliation score is a function of the authority scores for each data point submitted for a Work as well as the consistency and completeness of such information.

2.2.2. Counterclaims & Disputes Process

Counterclaims arise when multiple parties assert Shares for a Work that aggregate to greater than 100% for any rights type. ORFIUM MUSIC RIGHTS | GREECE follows CISAC's *Recommendation for Best Practice* and applies the '60 day' rule. Where a new claim conflicts with the claim of an existing rightsholder, then the new claimant must be able to support their claim with documentation before that claim is accepted by ORFIUM MUSIC RIGHTS | GREECE. In the interim, ORFIUM MUSIC RIGHTS | GREECE will continue to pay the first, original claimant. If the new claimant can support their claim via documentation, then the first claimant has 60 days to produce documentation in support of their claim. In the meantime, all royalties are held in suspense. If the original claimant has not answered within 60 days, they will be notified that their claim will be removed if ORFIUM MUSIC RIGHTS | GREECE does not hear from the original claimant within 15 days.

ORFIUM MUSIC RIGHTS | GREECE shall not make a value judgment of the supporting documentation and will only check that the following information is included: 1) term; 2) territory; 3) specific Works/limitation of repertoire; and 4) that the documents are signed and dated by all interested parties.

If both claimants produce supporting documentation, then either claimant may request ORFIUM MUSIC RIGHTS | GREECE to put the Work into suspense. In such an event, ORFIUM MUSIC RIGHTS | GREECE will require a court order or agreement between the claimant parties before releasing the Work from suspense.

Such documentation as supplied to support a claim in dispute will be shared with the parties involved in the dispute, with it being the responsibility of the parties to redact any confidential information from their documentation. When clearly identifiable only that part of a Work which is in dispute shall be placed into suspense.

2.2.3. Materiality Threshold

In the event a Work is in suspense with less than 0,06% margin of error (i.e. the total ownership for a given rights type of a Work is 100.9% or less), ORFIUM IME will make distribution payments for the Work by normalizing the Shares on a pro-rata basis to 100%.



2.3. Cue Sheets

In order to facilitate accurate royalty distributions from Television usage, and in addition to the automatic content recognition used to monitor broadcast licensees, ORFIUM MUSIC RIGHTS | GREECE maintains a database of relevant cue sheet information. Cue sheets are submitted directly to ORFIUM MUSIC RIGHTS | GREECE, along with usage logs, from Broadcasters, and may also be submitted by rightsholders.

ORFIUM MUSIC RIGHTS | GREECE also makes efforts to procure cue sheet data via other means, such as through other societies and CISACs International Documentation on Audiovisual Works and AV Index. For receiving domestic cue sheet information, ORFIUM MUSIC RIGHTS | GREECE offers an online submission portal available to Broadcasters and Publishers that facilitates both singular registrations and bulk file uploads. Legacy handwritten cue sheet data will be processed by using image-to-text recognition technology paired with manual review.

ORFIUM MUSIC RIGHTS | GREECE shall indicate the source of such data, whether such data has been manually reviewed (where such data has been processed by using image-to-text recognition technology), and whether such data has been notified by an authoritative source including an indicator of the level of such source's authority.

ORFIUM MUSIC RIGHTS | GREECE will deliver a report of known missing cue sheets to rightsholder upon an ad hoc request, i.e. those cue sheets that ORFIUM MUSIC RIGHTS | GREECE knows cannot be sourced by ORFIUM MUSIC RIGHTS | GREECE from the CISAC AVI Database or other available sources. Upon receipt of such, the rightsholder will endeavor to match the list and supply its relevant administered cue sheets.

3. Distribution

ORFIUM MUSIC RIGHTS | GREECE's objective is to achieve the most accurate representation feasible for actual music use by licensees and facilitate royalty allocations, payments, and reporting accordingly. Distributions to rightsholders will take place based on census data, to the extent possible, with real use of rightsholders' Works and a standardized level of diligence and fairness applied to all distributions. If sufficient data are not available, an analogy-based distribution method will be used using statistically valid data which reflect current patterns of music use. Distributions shall be calculated using a distribution formula, which will consider factors, including, but not limited to: type of use, medium of use, licensee weight, and time of use. Overall, ORFIUM MUSIC RIGHTS | GREECE's objective is to match collections as specifically as possible to usage data as the basis of distribution.

3.1. Distribution Periods & Frequency

Distributions shall be made within thirty days following the end of each fiscal quarter on collections and usage from two quarters in arrears.

3.2. Usage Data

Usage data is gathered in two ways, 1) through automatic content recognition, and 2) through data provided by the licensees. All licensees are required to provide some level of data, ranging from



general surveys to detailed usage reports (depending on the size and type of licensee). Automatic content recognition is used for all broadcast licensees.

3.2.1. User Provided Data

All licensees are required to respond to an online survey which indicates the specifics surrounding the type and nature of their music use, type and size of their business, source of where they obtain their music, and categories of music that they typically use (such as the genres and mix of international versus domestic music). ORFIUM MUSIC RIGHTS | GREECE's personnel will periodically verify the accuracy of the provided surveys.

3.2.2. Automatic Content Recognition

All broadcasters, in addition to the data they provide, are monitored using automatic content recognition for the purpose of augmenting and verifying their data.

3.3. Data Sources

3.3.1. Radio Broadcasters

Radio Broadcasters are required to provide actual usage data and, when feasible, the time-of-day and duration of each use. In addition, they are required to provide survey data on each station that includes information about the genre of music played.

3.3.2. TV & Cable Broadcasters

TV and Cable Broadcasters are required to provide actual usage data and, when feasible, the time-of-day and duration of each use and viewership by time-of-day. In addition, they are required to provide survey data on each station that includes information about the content and likely genre of music played. TV reports are matched to cue sheet data in order to derive usage at the Work level.

3.3.3. Measurement Agencies

Measurement agencies, such as broadcast ratings agencies, aggregate and measure data on audiences and media consumption across Radio, TV, and digital mediums. Information obtained from measurement agencies is used to model time-of-day demand for TV and Radio and develop statistical models from chart data to estimate music usage in cases where more specific information is not available.

3.3.4. Digital & Online Sources

Online data sources include webcasters (live streaming) and streaming services are required to provide actual usage reports. In addition, ORFIUM MUSIC RIGHTS | GREECE aggregates statistical data from common streaming services surrounding music use by Work, artist, genre, and geographic location. This statistical data is used to enhance usage estimates derived from the segmentation of certain music users into peer groups.



3.3.5. Background Music Suppliers

Licensed background music suppliers are required to report on actual usage reports. Background music reports are also used to enhance derived usage estimates for relevant peer groups.

3.3.6. Music Venues, Concert Halls, and Nightclubs

Large venues and concert halls that host live events are required to report on actual usage (via set lists). All venues are required to provide survey information. Additionally, ORFIUM MUSIC RIGHTS | GREECE collects playlist information from venues to incorporate into statistical models.

3.3.7. General Licensees

General licensees are not required to provide actual usage reports but are required to provide a survey. ORFIUM MUSIC RIGHTS | GREECE segments general licensees based on survey results into peer groups based on similarity of music use.

3.3.8. Ancillary Licensees

License fees from central licensing, cinemas, or other ancillary usage types are often not accompanied with actual usage data, however ORFIUM MUSIC RIGHTS | GREECE applies other usage pools, such as radio, for distribution purposes.

3.3.9. Physical

License fees from the sale of physical products are collected directly from the record labels or distributors and are accompanied with actual usage reports (the number of units produced).

3.4. User Peer Group

In order to obtain a higher quality representation of actual use for licensees that do not provide detailed usage data, all licensees are profiled into user peer groups with the goal to group similar types of licensees together based on survey information. Profile attributes include the type licensee, type of use (e.g. nightclub vs background music), specifics surrounding the source of music (e.g. if radio, which station), as well as categorizations of music used.

3.5. Usage Pool

Each peer group is assigned a usage pool consisting of either actual use data derived from the licensees in the peer group or estimated use data.

3.5.1. Actual Use

3.5.1.1. Active Reporting

Certain licensees such as certain radio and TV broadcasters actively report their actual use data.

3.5.1.2. Passive Monitoring



Actual use data is also collected through passive monitoring means such as automatic content recognition.

3.5.2. Estimated Use

3.5.2.1. Estimation by Sample

Estimation by sample is a method by which actual usage data collected within a peer group is used to estimate the overall usage of the same peer group by extrapolation.

3.5.2.2. Estimation by Proxy

Estimation by proxy is a method by which actual usage data collected from one peer group is used as a representation of the usage by another similar peer group.

3.5.2.3. Estimation by Statistical Modeling

Estimation by statistical modeling is an estimation method by which a statistical model is developed through various means, including aggregation of external sources of data (e.g, summarized data), such as music charts by genre.

3.6. Collection Pool

The collection pool for a peer group is the sum of all licensing fees collected from licensees within the peer group.

3.7. Allocation

Based on the usage pool and collection pool for a peer group, a per-unit basis royalty rate is computed for the overall peer group and then the collections are allocated to each Work in accordance with its pro-rata share of the usage basis. For certain usage, such as broadcasting, a time-of-day adjustment is applied that reflects the audience size during the time of the broadcast. The Work level royalty allocations are then joined with the Work's data (according to the Work's documentation process) in order to compute the royalty amounts per interested party.

3.7.1. Rate Basis Types

The rate basis is the metric by which usage is considered for royalty purposes. The rate basis types are as follows:

- Per Play - The number of times a Work was performed,
- Duration - The cumulative number of seconds a Work was performed,
- Cue-Sheet - The duration and placement of a performance derived from cue sheet data,
- Per Transaction - An instance of an activity such as a sale, copy, or download,
- As Reported - When royalties are directly reported for a Work such as for collections through another society.



3.7.2. Time-Of-Day Basis Adjustments

For TV and Radio where time-of-day information is available in usage data, the rate basis will be adjusted to reflect the size of the audience during the time of the use so that the rate basis becomes proportional to the unadjusted rate basis times the audience size.

3.8. Royalty Payout Rates

Please see Payout Breakdown and Commission Rate Table for the royalty payout rate and ORFIUM MUSIC RIGHTS | GREECE commission by usage type.

3.9. Payments & Reporting

3.9.1. Payments

Rightsholders will receive payments via direct transfer to the bank account that they registered with ORFIUM MUSIC RIGHTS | GREECE.

3.9.2. Reporting

Detailed distribution reports shall be made available to rightsholders in common formats such as the CISAC CRD format and a generic CSV format.

3.9.3. Payment Thresholds

ORFIUM MUSIC RIGHTS | GREECE has no payment threshold for rightsholders, but all royalty payments are less the cost of transfer (such as a bank wire fee or transaction fee).

3.10. Payment Procedures Surrounding Unreconciled Works

3.10.1. Insufficient Documentation

For any rights type of a Work in ORFIUM MUSIC RIGHTS | GREECE's rights database that remain unreconciled as a result of lack of documentation from rightsholders, ORFIUM MUSIC RIGHTS | GREECE will hold all associated royalties, solely within the specific rights type of a Work, for a maximum period of four (4) distribution cycles. If, after four (4) distribution cycles, the rights type of a Work remains unreconciled, ORFIUM MUSIC RIGHTS | GREECE will distribute royalties to the extent the Shares of the unreconciled rights type for the Work is known.

ORFIUM MUSIC RIGHTS | GREECE will make available to rightsholders a list of unreconciled Works for claiming on at least a semi-annual basis to cover all usage/distribution types, set out with indicators of value/priority.

3.10.2. Counterclaims & Disputes

Once a claim is disputed (per Section 2.2.2. above) and the new claimant can support their claim via documentation, then all royalties are held in suspense. As long as a Work remains disputed the royalties will remain in suspense, however royalty suspension will only apply to the Shares of the Work in dispute. ORFIUM MUSIC RIGHTS | GREECE will make available to rightsholders (via the



portal) a list of disputed Works for claiming on at least a semi-annual basis, set out with indicators of value/priority.

3.10.3. Adaptations & Arrangements

ORFIUM MUSIC RIGHTS | GREECE follows CISAC's regulations which specify that when there is doubt about which version of a Work has been used, all royalties shall be distributed to the rightsholders of the original Work. Only if the authorized adaptation / arrangement is known to be used then the adaptor / arranger is entitled to receive a share of royalties. For Works that have fallen into the Public Domain, all royalties shall be distributed to the arranger.

3.10.4. Unmatched Usage

Unmatched usage occurs when a Work referenced in usage data cannot be linked to a Work in ORFIUM MUSIC RIGHTS | GREECE's rights database. In such cases, royalties cannot be distributed according to the 'Unreconciled Works' procedure. At a later date, if the Work becomes registered causing the usage to get matched, any royalties payable that were being held in suspense will be distributed according to the Backpay and Adjustment procedure.

3.10.5. Notice Period & Distribution by Market Share

ORFIUM IME shall circulate a list of unreconciled Works each distribution cycle to all rightsholders, with the goal to minimize the amount of royalties payable held in suspense. Any accrued royalties unable to be distributed will be held for a period of three years, and ORFIUM IME will make best efforts to identify the appropriate rightsholders for payment of unreconciled Works. At the end of each fiscal year, all accrued royalties which have been held for more than three years will be paid out to the ORFIUM IME rightsholders on a market share basis.

3.11. Backpay & Adjustments

In certain situations, ORFIUM MUSIC RIGHTS | GREECE will disperse backpay royalties from previous periods for Works that were either held in suspense or because of an adjustment from another society through which ORFIUM IME has a reciprocal agreement.

3.12. International Royalties

In the event ORFIUM MUSIC RIGHTS | GREECE enters into reciprocal agreements with affiliate societies for them to license and collect royalties (applying the 'London' distribution key) on behalf of ORFIUM IME, rightsholders will have the option to opt-into such agreements.

3.13. Debit/Credit Payment Adjustments

In the event the royalties of a Work have been improperly distributed to a rightsholder, ORFIUM MUSIC RIGHTS | GREECE will issue a debit/credit to the rightsholder's account.



3.14. Interest on Royalties Payable

Any interest earned by ORFIUM MUSIC RIGHTS | GREECE on royalties payable will be paid out to rightsholders on a market share basis once every two (2) years.

3.15. Royalties payable to Rightsholders without a Direct Management Relationship

As a general rule, no royalties are payable to rightsholders that do not have a direct management relationship with ORFIUM MUSIC RIGHTS | GREECE. However, when an interest of a rightsholder that does not have a direct management relationship with ORFIUM MUSIC RIGHTS | GREECE is controlled directly by a publisher that has assigned its rights to ORFIUM MUSIC RIGHTS | GREECE, the royalties due to said rightsholder will be distributed to the related publisher with the direct management relationship with ORFIUM MUSIC RIGHTS | GREECE.



Annex A'

Revenue Category	Revenue Source	Performance Split (%)	Mechanical Split (%)	Commission Rate % per annual collections			Usage Data Method	Allocation Basis	Distribution Periods	Payment Deadlines
				Annual Collections below 30m	Annual Collections between 30m - 50m	Annual Collections above 50m				
Public Performance	General Licensing	100	0	20	20	20	Sample, Proxy, & Statistical Modeling	Per Play	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
Public Performance	Music Venues & Nightclubs	100	0	20	20	20	Sample, Proxy, & Statistical Modeling	Per Play	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
Public Performance	Concerts & Live Performances (under 50K attendance)	100	0	20	20	20	Active Reporting, Sample & Proxy	Per Play	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
Public Performance	Concerts & Live Performances (above 50K attendance)	100	0	10	10	10	Active Reporting, Sample & Proxy	Per Play	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
Broadcasting	Radio	70	30	20	18	16	Active Reporting, Passive Monitoring, & Proxy	Duration	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
Broadcasting	Television	70	30	20	18	16	Active Reporting, Passive Monitoring, & Proxy	Duration / Cue-Sheet	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
Additional Uses	Cinema	100	0	20	18	16	Active Reporting	Cue-Sheet	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
Additional Uses	Physical	0	100	10	10	10	Active Reporting	Per Transaction	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 31
Digital	Permanent Download	30	70	7	7	7	Active Reporting	Per Transaction	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
Digital	On-Demand Streaming	50	50	7	7	7	Active Reporting	Per Play	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
Digital	Passive Streaming	70	30	7	7	7	Active Reporting	Per Play	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
Digital	Webcasting	70	30	7	7	7	Active Reporting	Per Play	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
Digital	Cloud Services	50	50	7	7	7	Active Reporting	Per Play / Per Transaction	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
Digital	User Generated Content	50	50	7	7	7	Active Reporting	Per Play	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
Digital	Background Music Suppliers	70	30	7	7	7	Active Reporting	Per Play / Per Transaction	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
Digital	Mobile Companies	50	50	7	7	7	Active Reporting	Per Play / Per Transaction	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
International	International Performance Royalties Received From Affiliated Collecting Societies	100	0	5	5	5	Active Reporting	As Reported	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30
International	International Mechanical Royalties Received From Affiliated Collecting Societies	0	100	5	5	5	Active Reporting	As Reported	Jan-Mar, Apr-Jun, Jul-Sep, Oct-Dec	Oct 30, Jan 30, Apr 30, Jul 30

