



EUROPEAN CENTRAL BANK

EUROSYSTEM

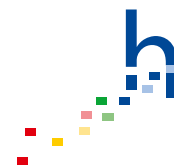
# Sixth T2S Harmonisation Progress Report

T2S Advisory Group  
18 March 2016



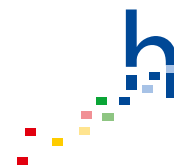
harmonisation





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## Abbreviations

### Countries (covered in the report)

AT Austria	IT Italy
BE Belgium	LT Lithuania
CH Switzerland	LU Luxembourg
DE Germany	LV Latvia
DK Denmark	MT Malta
EE Estonia	NL Netherlands
ES Spain	PT Portugal
FI Finland	RO Romania
FR France	SI Slovenia
GR Greece	SK Slovakia
HU Hungary	

### Others

AG	T2S Advisory Group
BSG	Broad Stakeholders Group
CAJWG	Corporate Actions Joint Working Group
CASG	(T2S) Corporate Actions Sub-group
CMU	capital markets union
CPSS	Committee on Payment and Settlement Systems
CSD	central securities depository
CSG	(T2S) CSD Steering Group
CSDR	CSD Regulation
DCP	directly connected party
DvP	delivery versus payment
ECB	European Central Bank
ECSDA	European Central Securities Depositories Association
E-MIG	European Market Implementation Group
EPTG	European Post Trade Group
EPTF	European Post-Trading Forum
ESCB	European System of Central Banks
ESMA	European Securities and Markets Authority
FISCO	Clearing and Settlement Fiscal Compliance expert group
HSG	(T2S) Harmonisation Steering Group
ICP	indirectly connected party
IOSCO	Technical Committee of the International Organization of Securities Commissions
NUG	(T2S) National User Group
SP	Synchronisation Point
T-BAG	Tax Barriers Business Advisory Group
TFAX	Task Force on adaptation to cross-CSD settlement in T2S
UDFS	T2S User Detailed Functional Specifications (v.1.21, 07/09/2012)
URD	T2S User Requirements Document (v.5.02, 07/09/2012)
XMAP	T2S Cross-border market practice sub-group



## Preface

Target2-Securities (T2S), the Eurosystem platform for settling securities in Europe, was launched on 22 June 2015. By 31 August 2015 five EU markets had joined T2S. On 29 March 2016 a further two markets will join them. By September 2017 a total of 21 European markets (covering 23 central securities depositories (CSDs)) will be connected.

T2S has the potential to provide a truly harmonised securities settlement process across all participating markets. This will contribute to safer and more efficient cross-border securities services (and thus cross-border investment) in the EU.

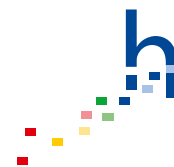
The extent to which this potential will materialise, bringing benefits to the entire European post-trade industry including issuers and investors, largely depends on all stakeholders adapting to and using T2S in a harmonised way. This is why both the Eurosystem and the T2S community of stakeholders (i.e. central banks, market infrastructures and participants) consider post-trade harmonisation to be a central objective of T2S and a key contribution to the integration of financial markets in Europe.

Over the last few years the T2S Community has done a considerable amount of work to create a single rulebook for post-trade processes (e.g. messaging protocols, operating hours, regulatory and legal rules) across the T2S markets. All rules and standards referred to in this publication have been endorsed by the T2S Advisory Group (AG), i.e. by senior representatives of market infrastructures, national central banks and financial intermediaries. AG members are committed to achieving full compliance with the harmonisation standards in their respective markets and are supporting their markets in this goal.

Will all T2S markets achieve compliance with the T2S harmonisation standards before they migrate to T2S? This report focuses on the level of compliance achieved by the markets in the first migration wave. It also closely monitors the markets planning to migrate in the second wave. The results show considerable progress in terms of compliance in the T2S markets concerned. They also provide evidence on the soundness of the harmonisation methodology by matching outcomes to planned actions. As anticipated, in the vast majority of cases, the markets already migrated to T2S comply fully with the T2S standards.

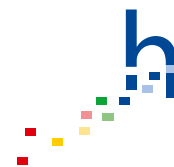
The report also covers the remaining gaps in the T2S harmonisation agenda. These now largely relate to what are considered the “macro” topics, i.e. regulatory and legal issues. The action plan for the creation of a capital markets union (CMU) in the EU, published by the European Commission on 30 September 2015, and the establishment of the European Post-Trading Forum (EPTF) are important initiatives which could potentially address most of these issues. Where relevant, the expected impact of the CMU agenda on the T2S harmonisation list is reflected in the current version of the report.

The AG plans to publish a status update before the third T2S migration wave (scheduled for 12 September 2016) and a full, seventh report before the fourth T2S migration wave (scheduled for 6 February 2017).



## Key messages

- **Common standards are already defined for 17 out of a total of 24 T2S harmonisation activities.** 15 of these 17 standards have been given high priority by the AG, i.e. the objective is to have the standards implemented by all markets by the time they migrate to T2S.
- **This report shows that substantial progress has been made since the last reporting cycle (completed in March 2015) regarding compliance of the T2S markets with the T2S harmonisation standards.** This is particularly important for the five markets which migrated to T2S between June and August 2015, i.e. Italy (Monte Titoli), Romania (Depozitarul Central), Malta (Malta Stock Exchange), Switzerland (SIX-SIS) and Greece (BOGS). The results reconfirm the robustness and credibility of the AG's harmonisation methodology.
- **In addition, the two markets that will migrate to T2S on 28 March 2016, i.e. Portugal (Interbolsa) and Belgium (NBB-SSS) are en route to full compliance with almost all T2S harmonisation standards.**
- **Looking at the remaining T2S markets, for most prioritised standards, no major obstacles to achieving full compliance on time are anticipated.** The main area where full compliance requires corrective action from some T2S markets (DE, FR, NL, BE, RO, PT and IT currently assigned red status) is related to the T2S corporate actions standards. These are complex business processes for asset servicing involving rules and procedures developed by a range of different actors. Gaps are still present, but T2S markets have done a great deal of work to address them.
- In most cases, **this good progress reflects the efforts of the T2S National User Groups (NUGs), which have provided a forum for the key national stakeholders to agree on detailed implementation plans.** These plans now include public dates for testing and migration readiness regarding the relevant standards. The national authorities, where relevant, have already adopted the necessary regulation, or have a plan to do so on time.
- **The definition and implementation of a harmonised settlement discipline regime remains the key gap to completing the high-priority T2S harmonisation activities.** The EU authorities are expected to adopt, by summer 2016, the relevant regulatory and implementing technical standards of the CSD Regulation. This should complete the definition process and pave the way for implementation (i.e. regulatory compliance) by the T2S CSDs and their markets of a harmonised settlement discipline regime in the EU.
- Regarding **the completion of the harmonisation activity covering the Settlement Finality I** concept (i.e. the moment of entry of a transfer order into the system), the T2S stakeholders are in the process of completing the steps needed to achieve full compliance with the agreed standard by all relevant actors.
- **For the rest of 2016** the AG will focus its harmonisation work on, but not limit it to, **monitoring the implementation plans of the T2S markets that will migrate to T2S on 12 September 2016 (migration wave 3)**, i.e. Belgium (Euroclear), France (Euroclear), the Netherlands (Euroclear), Denmark (VP Securities) and Luxembourg (VP Lux).
- **Finally, the AG will take steps to foster progress in the remaining harmonisation activities throughout 2016.** This requires coordinated effort by the T2S Community and the Eurosystem, in cooperation with the relevant EU and national public authorities. Some of these activities are receiving renewed momentum in the context of the European Commission's CMU action plan. Within this context, the AG is fully committed to supporting the Commission-led EPTF to fulfil its mandate to i) review the remaining, or any new, barriers to an integrated post-trade environment in the EU and ii) to provide technical advice to the Commission on follow-up actions.



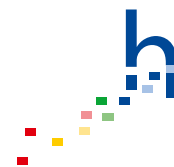
### **How to read the report**

It is advisable for readers to first familiarise themselves with the T2S harmonisation methodology used for compiling the report and the tables, including the criteria for assessing the compliance status of T2S markets – all this reference information is to be found in Annex 1.

The reader can then go into the description of each of the 24 activities. A snapshot of the “traffic light” status of each activity in terms of definition, monitoring and compliance, as well as in terms of compliance per market is included in the respective section.

For an overview of the status of all T2S markets, please refer to Annex 2 (the table on compliance per market).

For background information regarding the compliance status of each T2S market, please consult Annex 4. This annex contains a high-level summary of the information provided by each T2S market during the relevant surveys and monitoring processes.



# 1 Executive summary

The T2S Community<sup>1</sup>, the Governing Council of the ECB and EU public authorities share the view that post-trade harmonisation, as part of the EU's financial integration process, is a key objective of T2S. The idea underpinning this view is that financial market integration needs to be complemented and supported by integration of the underlying infrastructure. The creation of T2S constitutes the Eurosystem's contribution to securities market infrastructure integration, and it is widely recognised that the technical and operational harmonisation fostered by T2S, coupled with the legal and regulatory harmonisation agenda currently pursued by EU legislators, is a crucial ingredient for the creation of a single market for settlement services in Europe. This concept is also in line with the EU Commission's objective to establish the "building blocks" for a capital markets union by 2018.<sup>2</sup>

Since 2011 harmonisation progress reports have been published regularly by the AG, a group comprising over 90 senior officials from the T2S Community, including central banks, CSDs and market participants from all T2S markets, i.e. markets where at least one CSD has signed up for T2S.<sup>3</sup> Harmonisation is one of the group's central deliverables, as stated in its mandate. Harmonisation work is coordinated by the ECB with the help and guidance of the T2S Harmonisation Steering Group (HSG), a dedicated substructure of the AG set up in 2011.<sup>4</sup>

The previous five reports focused on i) identifying the T2S-relevant harmonisation issues and relevant actors, ii) the exact methodology to ensure consistency, credibility and effectiveness of the harmonisation process and iii) the implementation plans and compliance results for the T2S markets.

The sixth report contains updates since the AG's latest publication in April 2015. It covers a total of 21 EU markets, comprising 23 CSDs, and the status of 24 harmonisation "activities".<sup>5</sup>

Table 1 shows the status of all of these activities as regards (i) whether a T2S standard has been defined, (ii) whether a monitoring process has been launched and (iii) the overall compliance of T2S markets, as observed at this stage.

<sup>1</sup> The T2S Community is a community of stakeholders comprising market infrastructures, national central banks, financial intermediaries and observers from authorities and trade associations in Europe.

<sup>2</sup> On 30 September 2015, the EU Commission published an action plan for a capital markets union: [http://ec.europa.eu/finance/capital-markets-union/index\\_en.htm](http://ec.europa.eu/finance/capital-markets-union/index_en.htm)

<sup>3</sup> The list of all CSDs that have signed the T2S Framework Agreement is available in the CSD section on the T2S website: <http://www.ecb.europa.eu/paym/t2s/stakeholders/csd/html/index.en.html>

<sup>4</sup> Read more about the AG and the HSG in the relevant sections of the T2S website.

<sup>5</sup> Each T2S harmonisation activity is a sub-workstream which may include more than one standard. See, for example, the legal harmonisation activity in Table 1, which encompasses different rules of finality, outsourcing requirements and the conflicts of law issue.



**Table 1: Status dashboard of the T2S harmonisation activities (as at 18/02/2016)**

Activities – priority 1			Definition	Monitor	Compliance
1	T2S Messages	T2S ISO 20022 messages	G	G	G
2		T2S mandatory matching fields	G	G	G
3		Interaction for registration	G	G	G
4		Interaction for tax info	G	G	B
5	Schedule of settlement day		G	G	G
6	T2S Corporate actions standards		G	G	R
7	Legal harmonisation	Settlement finality I (moment of entry)	G	X	X
8		Settlement finality II (irrevocability of transfer order)	G	G	G
9		Settlement finality III (irrevocability of transfers)	G	G	G
10		Outsourcing IT services	G	G	B
11	Settlement discipline regime		Y	X	X
12	Settlement cycles		G	G	B
13	CSD account structures	Availability of omnibus accounts	G	G	B
14		Restrictions on omnibus accounts	G	G	Y
15	T2S accounts numbering	Securities accounts numbering	G	G	G
16		Dedicated cash accounts numbering	G	G	G
Activities – priority 2			Definition	Monitor	Compliance
17	Legal harmonisation	Location of securities account/conflicts of law	R	X	X
18	Corporate actions market standards	CA market (CAJWG) standards	G	G	Y
19	Place of issuance		Y	X	X
20	Tax procedures	Withholding tax procedures	R	X	X
21	Shareholder transparency - registration		R	X	X
22	Market access		Y	X	X
23	Securities amount data		G	G	G
24	Portfolio transfer		Y	X	X

The AG agreed to classify the T2S harmonisation activities according to two broad priority levels. **Priority 1 activities** are necessary to ensure efficient and safe cross-CSD settlement in T2S. The AG aimed to complete the definition process for these standards, ideally, before the launch of T2S (third column from the right in Table 1). All markets should be ready to operate in compliance with these standards by the time they migrate to T2S.

Regarding **priority 2 activities**, which are also important for the enhancement of the competitive environment and the efficiency of T2S, the AG agreed to continue pursuing them after the T2S launch. However, once the AG has endorsed priority 2 standards, T2S markets should aim to comply with them prior to their migration to T2S.

Regarding the definition column in Table 1, green indicates that the process is complete (i.e. a standard/rule has been endorsed by the T2S Community)<sup>6</sup>. At the other end of the spectrum, red means that there is currently a major obstacle to completing the definition process (or there are no actors working on a standard) and that urgent action is needed to facilitate the process.

As far as monitoring is concerned, green means that a monitoring and reporting framework has been established according to the agreed harmonisation methodology<sup>7</sup> and results are regularly reported to the ECB team.

<sup>6</sup> Endorsement by the T2S Community does not necessarily mean that the AG has the full responsibility for defining the standard, even for topics where it has been heavily involved. For example, some standards were laid down by the CSD Regulation, namely those relating to settlement cycles, IT outsourcing and the settlement discipline regime.

<sup>7</sup> See Annex 1 for the harmonisation methodology agreed by the AG.



Regarding the compliance column in Table 1, blue indicates that no further action is required in any of the T2S markets. Green shows that implementation is, overall, on track. Yellow indicates that some technical and regulatory barriers still need to be addressed in some national markets. Finally, red indicates that there are important barriers to fully implementing the standard in some markets and thus corrective action is required from private actors and national authorities. More details on the colour scheme are available in Annex 1 (Methodology).

As regards progress since the publication of the fifth report (April 2015), the following can be observed in Table 1.

**Definition process** – At present 17 standards out of a total of 24 activities are defined. It is important to note here that, of the seven for which a defined set of standards is missing, only one is a priority 1 activity, namely the settlement discipline regime. The adoption of the CSDR level 2 standards in Summer 2016, is expected to improve the definition process statuses for three more activities (settlement discipline regime, freedom of issuance and market access).

Three activities are assigned a red definition status in this report (location of securities accounts, shareholder transparency and tax procedures). This is due to the need to tackle legal barriers in the securities sphere, the lack of progress in terms of shareholder transparency and the finding that the recommendations issued by the Commission’s Tax Barriers Business Advisory Group (T-BAG) are at present not followed by most markets as agreed standards. The CMU action plan may provide the momentum for substantial follow-up action in these areas by both public authorities and private actors.

**Monitoring process** – All T2S markets are now fully monitored to assess their compliance with the harmonisation standards. There are well-established and agreed monitoring frameworks, deadlines and responsible actors for further action in each market. There is no change in the number of activities (16) that are monitored in this reporting cycle as compared with the previous cycle.

**Compliance status** – The rate of compliance of T2S markets has improved, with four activities marked in blue (no further monitoring required), nine activities in green, two activities in yellow and only one activity marked in red (compared with three blue, 11 green, one yellow and one red in the previous report). The improvement is down to the underlying efforts made by individual markets to comply with certain standards and may not be immediately evident in the aggregated picture provided by Table 1.

Despite the very good progress made in the last few years on priority 1 activities, significant steps still need to be taken to remove the remaining technical and regulatory barriers and ultimately achieve a truly open and efficient cross-border settlement environment in the EU and in T2S. Since the publication of the previous T2S harmonisation progress report, there has been little progress as regards the definition of new priority 2 standards and, consequently, the launch of new monitoring exercises. This is mostly owing to the fact that the elimination of a number of post-trade harmonisation barriers is dependent on progress in the current EU legislative initiatives in this field and on other EU-wide initiatives, the scope of which goes beyond T2S.

The publication of the CMU action plan and the establishment of the EPTF may provide the necessary momentum and the right governance forum at EU level to tackle these remaining “macro” harmonisation gaps.

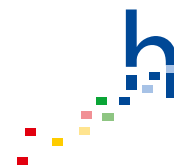


## Summary of monitoring results

Table 2 provides the detailed harmonisation compliance results per T2S market. For more information, see Annex 2.

**Table 2: Compliance status per T2S market (as at 18/02/2016)**

T2S Markets	Priority 1													Priority 2		
	1	2	3	4	5	6	8	9	10	12	13	14	15	16	18	23
	T2S messages ISO 20022	T2S matching fields	Interaction with T2S (Registration)	Interaction with T2S (Tax procedure)	Schedule of settlement day	T2S CA standards	T2S Settlement finality II	T2S Settlement Finality III	Outsourcing (settlement) services	Settlement cycle	Availability of omnibus accounts	Restrictions on omnibus accounts	Securities account number	Cash account number	CA market standards (CAJWG)	Securities amount data
AT	G	G	B	B	G	Y	B	B	B	B	B	B	G	G	Y	B
BE Euroclear	G	G	B	B	G	R-?	B	G	B	B	B	B	G	G	G	B
BE – NBB-SSS	B	B	B	B	G	G	B	B	B	B	B	Y	B	G	R-No info	B
CH	B	B	B	B	R-Mar-2016	B	B	B	B	B	B	B	B	NA	G	B
DE	G	G	B	B	G	R-?	G	G	B	B	B	B	G	B	G	B
DK	G	G	B	B	G	G	B	Y	B	B	B	B	G	B	G	B
EE	G	G	B	B	G	G	B	G	B	B	B	B	G	B	Y	B
ES	G	G	B	B	G	G	B	B	B	G	B	B	G	B	G	B
FI	B	B	B	B	G	G	B	B	B	B	B	Y	B	G	Y	B
FR	G	G	B	B	G	R-?	B	G	B	B	B	Y	G	B	G	B
GR – BOGS	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
HU	G	G	B	B	G	G	G	G	B	B	B	B	G	NA	R	B
IT	B	B	B	B	B	R-Dec-2016	B	B	B	B	B	B	B	B	B	B
LT	G	G	B	B	G	G	G	G	B	B	B	B	G	G	R	B
LU – LUX CSD	G	G	B	B	G	G	G	B	B	B	B	B	G	G	R-No info	B
LU – VP LUX	G	G	B	B	G	G	B	B	B	B	B	B	G	G	R-No info	B
LV	G	G	B	B	G	Y	G	G	B	B	B	B	G	G	G	G
MT	B	B	B	B	B	B	B	B	B	B	B	B	B	B	G	B
NL	G	G	B	B	G	R-?	B	G	B	B	B	B	G	B	G	B
PT	G	G	B	B	G	R-Sep-2016	G	G	B	B	B	B	G	B	G	G
RO	B	B	B	B	B	R-Feb-2017	B	B	B	B	B	B	B	B	Y	B
SI	G	G	B	B	G	G	G	G	B	B	B	B	G	G	R	G
SK	G	R-?	G	B	G	G	G	G	B	B	B	Y	G	G	R-No info	G



A specific colour, based on a four-colour scheme, reflects the compliance status of each T2S market for the 16 monitored activities detailed in this harmonisation progress report. 21 EU national markets are covered; however, where more than one CSD exists in a given market, each “CSD market segment” is monitored separately. The AG focuses its analysis on T2S markets rather than specific T2S actors (CSDs, etc.) since there is a common understanding that harmonisation compliance is a coordinated effort across the entire national market, involving national market infrastructures, their clients and, where relevant, national authorities.

Red is assigned to markets that are not planning to fully comply with a given standard by their T2S migration date. Yellow means that there are obstacles which may prevent the achievement of full compliance by the migration deadline, or that detailed plans are still incomplete. Green indicates the existence of a full compliance plan provided by the relevant NUG to the ECB team. Finally, blue means the relevant T2S market is already operating according to the T2S standard. More details on the colour scheme methodology used by the AG are available in Annex 1.

**Table 3: Change in compliance status per T2S market (as at 18/02/2016)**

T2S Markets	Priority 1														Priority 2				
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (Registration)	4 Interaction with T2S (Tax procedure)	5 Schedule of settlement day	6 T2S CA standards	8 T2S Settlement finality II	9 T2S Settlement Finality III	10 Outsourcing IT (settlement services)	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data			
AT																G	Y		
BE Euroclear																			
BE – NBB-SSS	G	B										G	Y			G	R		
CH	G	B	G	B			G	B	G	B				G	B				
DE																G	B		
DK																G	B		
EE																			
ES																			
FI																			
FR												G	Y			G	B	Y	G
GR – BOGS	G	B	G	B		G	B			G	B			G	B	G	B	G	B
HU																			
IT	G	B	G	B		G	B			G	B			G	B			G	B
LT										Y	G	Y	G						
LU – LUX CSD																		Y	R
LU – VP LUX																		Y	R
LV																		Y	G
MT	G	B	G	B		G	B							G	B	G	B	Y	G
NL																G	B		
PT							G	R											
RO	G	B	G	B		G	B			G	B			G	B	G	B		
SI																			
SK		G	R																

Table 3 provides information on the changed statuses since the fifth progress report. The previous status is shown on the left-hand side of each cell, while the right-hand side indicates the current status. With the first T2S migration wave having been completed, most compliance statuses have turned blue. However, there are some cases (SK, IT, PT, FR, NBB SSS) where the compliance status has been downgraded, primarily for corporate actions.

After a market has migrated to T2S, only two compliance statuses apply – red or blue – as by that point it is either compliant with the T2S standards or it is not. The green and yellow statuses are only used for markets that have not yet migrated.<sup>9</sup>

<sup>9</sup> The AG has agreed, as an exception to this rule, to keep the green and yellow statuses for the priority 2 activity on “market corporate actions standards”. This is justified by the fact that the AG substructures do not monitor the T2S markets directly with regard to this standard, but follow a specific statistical compliance methodology based on the monitoring results it receives from the E-MIG

**Table 4: Compliance status of T2S markets in the first migration wave (as at 18/02/2016)**

T2S Markets	Priority 1														Priority 2	
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (Registration)	4 Interaction with T2S (Tax procedure)	5 Schedule of settlement day	6 T2S CA standards	8 T2S Settlement finality II	9 T2S Settlement Finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data
CH	B	B	B	B	R - Mar 2016	B	B	B	B	B	B	B	B	NA	G	B
GR – BOGS	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
IT	B	B	B	B	B	R - Dec 2016	B	B	B	B	B	B	B	B	B	B
MT	B	B	B	B	B	B	B	B	B	B	B	B	B	B	G	B
RO	B	B	B	B	B	R - Feb 2017	B	B	B	B	B	B	B	B	Y	B

**Wave 1 post migration results** – Table 4 shows that, with the exception of two instances for corporate actions and one for the time schedule, all wave 1 T2S markets (i.e. IT, RO, MT, CH, and GR (BOGS)) are now fully compliant with the priority 1 T2S harmonisation standards. The Swiss market is planning to comply fully with the schedule of settlement day standard by 28 March 2016. Regarding corporate actions standards, the Italian and the Romanian markets have announced implementation plans for achieving full compliance by December 2016 and February 2017 respectively.

**Table 5: Compliance status of T2S markets in the second migration wave (as at 18/02/2016)**

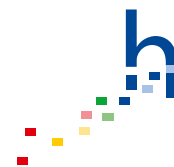
T2S Markets	Priority 1														Priority 2	
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (Registration)	4 Interaction with T2S (Tax procedure)	5 Schedule of settlement day	6 T2S CA standards	8 T2S Settlement finality II	9 T2S Settlement Finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data
BE – NBB-SSS	B	B	B	B	G	G	B	B	B	B	B	Y	B	G	R - No info	B
PT	G	G	B	B	G	R - Sep 2016	G	G	B	B	B	B	G	B	G	G

**Wave 2 monitoring results** – As shown in Table 5, full compliance with almost all priority 1 standards is expected by both markets following their migration. In the case of the Belgian market (NBB-SSS), the limited restrictions on the use of omnibus accounts and the remaining gaps in compliance with the EU corporate actions standards should not considerably affect interaction with this market. The Portuguese market is planning its full compliance with the T2S CA standards by September 2016.

**Table 6: Compliance statistics for T2S markets (as at 18/02/2016)**

	Fifth report <sup>10</sup>			Sixth report		
	Priority 1	Priority 2	% of total statuses	Priority 1	Priority 2	% of total statuses
Blue	162	19	49	195	21	59
Green	144	16	43	109	14	33
Yellow	8	7	4	7	4	3
Red	6	4	3	9	7	4
N/A	2	0	0	2	0	0
<b>Total</b>	<b>322</b>	<b>46</b>	<b>368 (100%)</b>	<b>322</b>	<b>46</b>	<b>368 (100%)</b>

<sup>10</sup> The numbers for the fifth report have been adjusted in this report in order to take into account the withdrawal of the Bank of New York Mellon CSD.



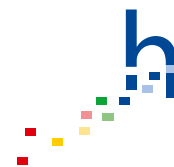
- 59% of the total statuses are now blue compared with 49% in the last report. This shows that, at least so far, when markets migrate to T2S they achieve close to full compliance with the T2S standards. This result is consistent with the high number (43%) of green statuses in the last report. **In other words, compliance plans and AG assessments were confirmed by the ex-post monitoring results.**
- The cases of non-compliance (red statuses) have increased marginally from 3% (fifth report) to 4% (sixth report) of the total statuses.<sup>11</sup> This is largely attributable to non-compliance with the T2S and market corporate actions standards. As noted elsewhere in this report, the AG will provide its assessment to the T2S Board regarding the impact of these gaps on the rest of the T2S stakeholders.

### Next steps

Regarding the next steps for fostering progress in the T2S harmonisation agenda, work will intensify as further T2S migration waves approach (starting in September 2016). In particular, the AG is planning to undertake the following during 2016.

- The main focus of 2016 will be on completing the work on the priority 1 activities, with the aim of completing the monitoring process and assessing the level of compliance.
- Pending the adoption of the CSDR level 2 standards, the AG will assess whether the T2S Community needs to take any further action on the affected T2S harmonisation activities (i.e. settlement discipline regime, market access and freedom of issuance).
- The AG will continue assessing the impact of the non-compliance cases on the rest of the T2S Community. The AG will provide its advice to the T2S Board accordingly.
- The AG will closely monitor the compliance and implementation plans of the markets in the third migration wave (migration date 12 September 2016). It will also assess the actual compliance achieved by the markets in the second T2S migration wave during live operations.
- The AG will seek to encourage progress on the priority 2 activities, in cooperation with market stakeholders and public authorities. In this context, the AG members fully support the European Commission's CMU action plan and are committed to providing technical support to the Commission's European Post Trading Forum (EPTF), where necessary. The T2S Community is represented in the EPTF by the chairman of the T2S HSG.
- The AG plans to publish a status update before the third T2S migration wave (scheduled for 12 September 2016) and a full, seventh report before the fourth T2S migration wave (scheduled for 6 February 2017).

<sup>11</sup> There are also two statuses marked with an "N/A" in Table 2, meaning "not applicable", e.g. for the standard on cash accounts where the local national central bank does not provide liquidity.



## 2 Introduction

### **The T2S project and post-trade harmonisation**

One of the aims of T2S is to help overcome the current fragmentation in the securities settlement layer of the post-trade landscape, thus making an important contribution to the establishment of a single market for post-trade securities services in Europe.

The T2S Community, through the AG, has engaged in the issue of post-trade harmonisation to respond to the market's request to deliver T2S in a harmonised post-trade environment: the full benefits of an integrated settlement platform can only be obtained if market rules surrounding settlement are harmonised across participating markets. In addition, a high level of harmonisation and standardisation ensures that the T2S operational blueprint is a lean one and does not perpetuate national specificities that could undermine the T2S project plan and the system's efficiency.

Beyond T2S, post-trade harmonisation represents an important contribution to the integration of financial markets in Europe. It is therefore part of the ECB's contribution to the CMU agenda in the field of cross-border investments.

The importance of T2S for financial integration in Europe is also illustrated in the ECB's report on financial integration in Europe, published in April 2015.<sup>12</sup>

### **T2S harmonisation list**

This sixth report addresses, in detail, a total of 24 harmonisation sub-workstreams (referred to as "activities"), which are currently managed by the ECB team under the guidance of the HSG and subject to the endorsement of the AG.

These activities and, where relevant, the related standards are the result of very close cooperation between the Eurosystem and market actors: they include AG agreements, HSG proposals, the work of AG substructures, analysis conducted by the ECB team and other public and private initiatives outside the T2S governance arrangements.

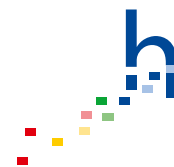
The report provides the following information for each harmonisation activity

- a short definition of the activity;
- the concrete objective of the activity;
- the implementation deadline;
- the responsible monitoring and implementation actor(s);
- details on the current compliance status of each T2S market;
- the monitoring process required, including interim deadlines prior to the implementation deadline.

T2S harmonisation activities are broken down into priority 1 and priority 2 topics.

***Priority 1 activities are necessary to ensure efficient and safe cross-CSD settlement in T2S. The HSG and the ECB team should focus on these activities as first priorities for resolution and implementation prior to the markets' migration to T2S.***

<sup>12</sup> Available at: <https://www.ecb.europa.eu/pub/pdf/other/financialintegrationineurope201504.en.pdf>



The AG identified 16 priority 1 activities:

1. T2S ISO 20022 messages;
2. T2S mandatory matching fields;
3. interaction with T2S (registration procedures);
4. interaction with T2S (tax info requirements);
5. T2S schedule for the settlement day and calendar;
6. T2S corporate actions standards;
7. Settlement Finality I;
8. Settlement Finality II;
9. Settlement Finality III;
10. IT outsourcing (settlement services);
11. settlement discipline regime;
12. settlement cycles;
13. availability of omnibus accounts;
14. restrictions on omnibus accounts;
15. securities account numbers;
16. dedicated cash account numbers.

*Priority 2 activities are not essential to ensure safe and efficient cross-CSD settlement in T2S, but they are key for the enhancement of the competitive environment and the efficiency of T2S, and could continue to be pursued after the markets' migration to T2S.*

The AG identified the following priority 2 harmonisation activities:

17. location of securities accounts/conflict of law;
18. corporate actions market standards;
19. place of issuance;
20. withholding tax procedures;
21. cross-border shareholder transparency and registration procedures;
22. market access and interoperability;
23. securities amount data;
24. portfolio transfers.

### **Structure of the report**

The sixth T2S harmonisation progress report is structured as follows:

- Section 3 provides updated information on priority 1 harmonisation activities, including where relevant, the compliance status of each T2S market;
- Section 4 provides updated information on priority 2 harmonisation activities, including, where relevant, the compliance status of each T2S market;
- Annex 1 describes the methodology agreed by the AG for compiling the T2S harmonisation list, including the four-colour status assignment scheme;
- Annex 2 features a table summarising the compliance status in all T2S markets (the T2S harmonisation “scoreboard”);
- Annex 3 features the AG’s impact analysis of those T2S markets assessed as non-compliant with the T2S standards (red statuses) – the AG presents this analysis to the T2S Board for any further action;
- Annex 4 reports the detailed results of the monitoring exercise broken down by each T2S market;
- Annex 5 provides background information on the AG as the body publishing this report, including the list of members.





### 3 T2S harmonisation activities – priority 1

Priority 1 activities are necessary to ensure efficient and safe cross-CSD settlement in T2S. The HSG and the ECB team should focus on these activities as first priorities for resolution before the T2S launch and for implementation prior to the markets' migration to T2S.

#### T2S messages

The following four sections cover all activities aimed at harmonising the use of settlement messages across T2S markets. Besides the use of a common list of messages and matching fields, this also includes AG agreements regarding the use of T2S messages for non-settlement information (specifically relating to registration and fiscal status).

#### 3.1 T2S ISO 20022 messages

##### Activity description

The objective of this activity is to monitor the development and implementation of the T2S ISO 20022 messages.

T2S ISO messages are part of the technical specifications/requirements for T2S actors' interaction with the T2S services. T2S actors that do not comply with T2S ISO messages will not be able to connect to and communicate with the T2S technical platform (including during testing).

T2S markets are to achieve compliance before migration to T2S (depending on their migration wave).

##### Activity status

Priority 1 – activity no 1	Definition	Monitoring	Compliance
T2S ISO 20022 MESSAGES	G	G	G

##### T2S STANDARD:

**T2S actors will communicate with the T2S technical platform using a set of ISO 20022 compliant messages (130 messages in total), customised to the specific needs of T2S.<sup>13</sup>**

Some of these messages have been ISO 20022 registered and the rest of them will be registered during the course of the T2S migration. The AG (via the T2S Sub-group on Message Standardisation<sup>14</sup>) and the 4CB<sup>15</sup> were the main actors in charge of the definition process for this activity.

##### Compliance status of T2S markets

All T2S markets have provided their plans as to when they will implement the T2S ISO 20022 messages in view of their migration to T2S. No operational or regulatory barriers have been reported or identified so far. Seven T2S markets are already operating in full compliance with this standard (i.e. blue status assigned by the AG).

<sup>13</sup> The full catalogue can be found in section 3 of the current T2S User Detailed Functional Specifications (UDFS) as published on the ECB/T2S webpages: [http://www.ecb.europa.eu/paym/t2s/pdf/t2s\\_udfs\\_v2.1\\_clean\\_20151202\\_.pdf](http://www.ecb.europa.eu/paym/t2s/pdf/t2s_udfs_v2.1_clean_20151202_.pdf)

<sup>14</sup> For more information on the T2S Sub-group on Message Standardisation, please visit the relevant page of the T2S website.

<sup>15</sup> The 4CB is made up of the four national central banks of Germany, Spain, France and Italy that were mandated by the Governing Council of the ECB to develop and operate T2S.



CSDs are participating in T2S testing activities (which started in October 2014) using the T2S ISO messages.

Blue	BE (NBB SSS), CH, FI, GR (BOGS), IT, MT, RO
Green	AT, BE (Euroclear), DE, DK, EE, ES, FR, HU, LT, LU (LuxCSD), LU (VP LUX), LV, NL, PT, SI, SK
Yellow	None
Red	None

*Information input: T2S NUGs.*

For details on the compliance status and colour methodology, please refer to Annex 1. For detailed explanations per T2S market, please refer to Annex 4.

### Monitoring

Implementation date	Migration to T2S (depending on migration wave). CSDs are participating in their respective T2S testing activities using the T2S ISO messages.
Monitoring actors	ECB team, T2S NUGs.
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective T2S NUGs. Monitoring is a continuous process taking place before and after each T2S market migrates to T2S.

## 3.2 T2S matching fields

### Activity description

The objective of this activity is to ensure that all T2S markets use the T2S matching fields<sup>16</sup> in a standardised way for settlement in T2S. Non-compliance with this standard might negatively affect matching rates in T2S, thus leading to inefficiencies and a possible cost increase for the other CSDs in the T2S Community.

In addition, the existence of a single and exhaustive list of matching fields allows T2S actors (e.g. investor CSDs, intermediaries) to access all T2S markets without the need for managing divergent and mandatory specificities in the settlement transaction flow. This ensures a level playing field, independently of the location of matching services within the T2S markets.

T2S markets are to achieve compliance before their migration to T2S (depending on their migration wave).

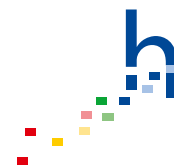
### Activity status

Priority 1 – activity no 2	Definition	Monitoring	Compliance
T2S MATCHING FIELDS	G	G	G

**T2S STANDARD:**  
**T2S actors are required to use as matching fields only the ones described in the relevant T2S system specification documents.<sup>17</sup>**

<sup>16</sup> See T2S UDFS (Section 1.6.1.2.3).

<sup>17</sup> See T2S UDFS (Section 1.6.1.2).



The single list of T2S matching fields is applicable to all matching activities (CSD matching services taking place either in T2S or outside the T2S platform) that lead to settlement in T2S (settlement in T2S securities and cash accounts).

This standard does not rule out that CSDs and their participants may use additional information/fields in their settlement instructions where applicable. This information may be necessary for CSDs providing certain ancillary services to their participants (e.g. repo and collateral services).

### Compliance status of T2S markets

All T2S markets have explicitly reported that they will fully comply with the T2S matching fields (green status) and are participating in T2S testing activities (which started in October 2014) using the matching fields standards. Finland, Belgium (NBB-SSS), Greece, Italy, Malta, Romania and Switzerland are already using T2S matching fields in their day-to-day operations. The Slovakian market will continue using matching fields which are not part of the T2S standard. The AG will provide the T2S Board with an impact analysis of this case of non-compliance by the end of the first quarter of 2016.

Blue	CH, FI, BE (NBB-SSS), GR (BOGS), IT, MT, RO
Green	AT, BE (Euroclear), DE, DK, EE, ES, FR, HU, LT, LU (LUX CSD), LU (VP LUX), LV, NL, PT, SI
Yellow	None
Red	SK

*Information input: SP2, SP3 and bilateral discussions.*

For details on the compliance status colour methodology, please refer to Annex 1. For detailed explanations per T2S market, please refer to Annex 5.

### Monitoring

Implementation date	Migration to T2S (depending on migration wave). CSDs are participating in their respective T2S testing activities using the T2S ISO messages.
Monitoring actors	ECB team, T2S NUGs.
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective T2S NUGs. Monitoring is a continuous process taking place before and after each T2S market migrates to T2S.

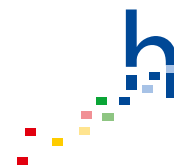
## 3.3 Interaction with T2S (registration procedures)

### Activity description

The objective of this activity is to establish a T2S standard regarding the exchange of registration-related information in T2S.

The adoption of a homogeneous practice across all T2S markets aims to ensure that registration procedures do not interrupt straight-through processing nor hamper smooth cross-CSD settlement in T2S. Including registration information in T2S settlement instructions could reduce settlement efficiency in T2S by causing T2S instructing actors to put instructions on hold.<sup>18</sup> Non-compliance would impose back-office costs on instructing counterparties and discourage cross-CSD activity in T2S.

<sup>18</sup> This matter was thoroughly analysed by the TFAX, an AG substructure, in its final report (November 2012). Registration and settlement are closely related processes. It is crucial to adapt settlement and registration processes in order to achieve alignment of settlement and registration data. In practice, it is important to ensure that the register is only updated after confirmation of settlement. The TFAX report is available on the T2S website.



The target date for T2S markets to fully comply with this standard is their migration date to T2S (depending on their migration wave).

### Activity status

Priority 1 – activity no 3	Definition	Monitoring	Compliance
INTERACTION WITH T2S (REGISTRATION PROCEDURES)	G	G	G

**T2S STANDARD:**  
**Registration details should not be exchanged via T2S messages.**

The standard is based on the TFAX's analysis, which showed that using T2S messages to transmit registration data could affect cross-CSD settlement efficiency and increase complexity in T2S. In addition, based on the current T2S design, this solution would not be feasible in all settlement scenarios.

Further registration-related aspects that might have an impact on cross-CSD settlement are analysed under the relevant priority 2 harmonisation activity elsewhere in this report (see Section 4.5).

### Compliance status of T2S markets

Based on the information gathered during surveys carried out with the T2S NUGs and on monitoring undertaken by the ECB team, most of the T2S markets are currently compliant with the standard or have a plan in place to fully comply by the time of their migration to T2S. Spain and Slovakia have agreed on implementation plans for full compliance by the time of their migration to T2S.

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, FI, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI
Green	ES, SK
Yellow	None
Red	None

### Monitoring

Implementation date	Migration to T2S (depending on migration wave). CSDs are participating in their respective T2S testing activities using the T2S ISO messages.
Monitoring actors	ECB team, T2S NUGs.
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective T2S NUGs. Monitoring is a continuous process taking place before and after each T2S market migrates to T2S.

## 3.4 Interaction with T2S (tax info requirements)

### Activity description

The objective of this activity is to define T2S best market practice for the management of transaction-related tax information across borders, in order to avoid the inefficiencies generated by heterogeneous local tax requirements (transaction-related tax rules and information flow).



Non-compliance would impose back-office costs on other instructing parties and might discourage cross-CSD activity in T2S.

The target date for T2S markets to have adopted a common market practice in this field is their migration to T2S (depending on their migration wave).

### Activity status

Priority 1 – activity no 4	Definition	Monitoring	Compliance
INTERACTION WITH T2S (TAX INFO REQUIREMENTS)	G	G	B

#### T2S STANDARD:

#### Tax-related information for domestic and cross-CSD transactions is not passed via T2S messages

Note: Tax-related information includes, but is not limited to, the tax status of the transaction, tax status or tax ID of the end investor, tax exemption identification number, alien registration number, passport number, corporate identification number, driving license number, foreign investment identity number, BIC, proprietary ID and name and address of the investor. ISO messages provide fields that can be used to pass information about a particular transaction tax type (withholding tax, payment levy tax, local tax, stock exchange tax, transfer tax, value-added tax, consumption tax), as well as the amount, debit/credit indicator, currency and other details. To fully comply with this standard, T2S markets/CSDs should not use these fields to pass on any kind of tax-related information.

The TFAX analysed the possibility of interaction with T2S as regards local tax requirements and concluded that there is no technical and process-based solution which would achieve efficient tax processing in the T2S environment.

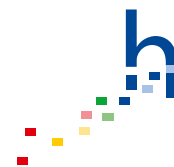
#### Compliance status of T2S markets

Based on the information gathered during surveys carried out with the T2S NUGs and on monitoring undertaken by the ECB team, all T2S markets are currently fully compliant with the standard.

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, ES, FI, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK
Green	None
Yellow	None
Red	None

#### Monitoring

Implementation date	Migration to T2S (depending on migration wave). CSDs are participating in their respective T2S testing activities using the T2S ISO messages.
Monitoring actors	ECB team, T2S NUGs.
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective T2S NUGs. Monitoring is a continuous process taking place before and after each T2S market migrates to T2S.



### 3.5 T2S schedule for the settlement day and calendar

#### Activity description

The use of a single schedule for the T2S settlement day and a single calendar per currency is established by the T2S User Requirements Document (URD) and is one of the first and key harmonisation agreements in the T2S context.<sup>19</sup> The AG agreed, from the first stages of the T2S project, that the full compliance of T2S markets with the T2S schedule and calendar is a prerequisite for an efficient cross-CSD environment in T2S.

The main aim of this activity is twofold. First, its implementation should provide assurance on the removal of Giovannini barrier 7 on *operating hours, settlement deadlines and opening days*<sup>20</sup> in T2S markets. Second, CSDs and their clients should have the possibility to define, within the single T2S schedule, their preferred operational model according to their business needs and service level agreements.

The AG took note that the proposals for the CSDR implementing technical standards, published by the European Securities and Markets Authority (ESMA) on 28 September 2015, include the legal requirement that linked CSDs (in an interoperable link arrangement) “shall agree on equivalent standards concerning reconciliation, opening hours for the processing of the settlement and of the corporate actions and cut-off times”.<sup>21</sup>

The target date for each T2S market to achieve full compliance with the T2S standard is its migration date to T2S.

#### Activity status

Priority 1 – activity no 5	Definition	Monitoring	Compliance
T2S SCHEDULE FOR THE SETTLEMENT DAY AND CALENDAR	G	G	G

#### T2S STANDARD:

**T2S markets should be fully compliant with the T2S schedule for the settlement day and calendar, available on the T2S website.**

In order to ensure consistency when monitoring implementation across T2S markets, it should be clarified that the status of “full compliance” with the T2S schedule and calendar is achieved if the following conditions are met by the T2S market/CSD in question.

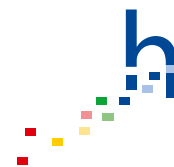
The T2S market/CSD operational model should ensure that:

1. the CSDs’ securities accounts (and national central banks’ dedicated cash accounts) in T2S are available for bookings throughout the whole T2S timetable (credits, debits, realignment, etc.);
2. settlement efficiency in T2S is not affected – for example, the T2S market/CSD will participate in the start-of-day processes and in the timely processing of corporate actions in a systematic manner;

<sup>19</sup> The URD is available in the key documents section of the T2S website.

<sup>20</sup> For further information, see [http://ec.europa.eu/internal\\_market/financial-markets/docs/clearing/second\\_giovannini\\_report\\_en.pdf](http://ec.europa.eu/internal_market/financial-markets/docs/clearing/second_giovannini_report_en.pdf)

<sup>21</sup> See 3.12 Article CSD Links (Article 48): [https://www.esma.europa.eu/sites/default/files/library/2015/11/2015-esma-1457\\_-\\_final\\_report\\_csdr\\_ts\\_on\\_csd\\_requirements\\_and\\_internalised\\_settlement.pdf](https://www.esma.europa.eu/sites/default/files/library/2015/11/2015-esma-1457_-_final_report_csdr_ts_on_csd_requirements_and_internalised_settlement.pdf)



3. all other T2S daytime (operating hours) and cut-off times are respected (delivery-versus-payment (DvP) cut-off, etc.);
4. CSDs provide directly connected parties (DCPs) with authorisation for connecting to T2S (where required and subject to the relevant T2S technical requirements).

In case of CSD legacy systems shut down during the T2S operating hours, CSD participants (investor CSDs, DCPs and indirectly connected parties (ICPs)) may not receive the same level of service. In particular, the timing according to which settlement instructions are sent to and reports are received from T2S-relevant settlement processes will depend on the CSD participants' connectivity model to T2S (DCP, user to application, etc.). This is an issue of business models and service level agreements between CSDs and their participants. This policy should not affect the compliance status of a T2S market, provided that the above four conditions are met.

The T2S schedule is specified in the current version of the Scope Defining Set of Documents. The exact times in the T2S settlement day schedule could be subject to revisions based on changes in the T2S Community's business needs.

### Compliance status of T2S markets

All T2S markets, except Switzerland, will comply with the standard by the time of their migration to T2S. The Swiss market has reported to the AG that compliance will only be possible by 28 March 2016.

As part of the non-compliance impact analysis (see Annex 3), the T2S Board agreed that the overall impact on the rest of the T2S Community is considered "low", taking into account the low transaction volumes, the relatively short period of non-compliance and the low risk of non-implementation.

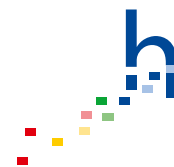
Blue	GR (BOGS), IT, MT, RO
Green	AT, BE (Euroclear), BE (NBB-SSS), DE, DK, EE, ES, FI, FR, HU, LT, LU (LUX CSD), LU (VP LUX), LV, NL, PT, SI, SK
Yellow	None
Red	CH

*Information input: SP2, SP3 and bilateral interactions with NUGs.*

For details on the compliance status colour methodology, please refer to Annex 1. For detailed explanations per T2S market status, please refer to Annex 4.

### Monitoring

Implementation date	Migration to T2S (depending on migration wave). CSDs are participating in T2S testing activities in line with the T2S schedule for the settlement day.
Monitoring actors	HSG (via T2S NUGs).
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective T2S NUGs. Monitoring is a continuous process taking place before and after each T2S market migrates to T2S.



### 3.6 T2S corporate actions standards

#### Activity description

Differences in national rules related to the processing of corporate actions have been identified by the industry as one of the most critical obstacles to an integrated EU post-trade environment. As identified by the Giovannini Report (barrier 3), these differences cover a broad range of topics, with an impact beyond core settlement problems (e.g. variety of rules, information requirements and deadlines for corporate actions). These differences may require specialised local knowledge or the local storage of physical documents, and so inhibit the centralisation of securities settlement.

The AG endorsed the T2S corporate actions standards in July 2009 and updated them in May 2013.<sup>22</sup> Non-compliance with these standards by T2S markets would hamper the efficient management of corporate actions on flows, especially in the context of cross-CSD settlement. These standards are based on the high-level corporate actions market standards as defined by the European Commission-sponsored CAJWG (see activity no 18, described in Section 4.2). More specifically, the T2S corporate actions standards provide the details necessary for T2S markets to implement the market standards for corporate actions on flows in a harmonised way in T2S.

Full compliance with the T2S corporate actions standards needs to be achieved before a market migrates to T2S. T2S markets are also required to be able to participate in bilateral interoperability testing, multilateral testing and community testing in line with the T2S corporate actions standards.

#### Activity status

Priority 1 – activity no 6	Definition	Monitoring	Compliance
T2S CORPORATE ACTIONS STANDARDS	G	G	R

#### T2S STANDARD:

**T2S markets should comply with the T2S corporate actions standards, as endorsed by the AG and published on the T2S website, related to corporate actions on flows (i.e. market claims, transformations and buyer protection).**

In addition to the standards, the T2S Corporate Actions Sub-group (CASG) has published a detailed frequently asked questions (FAQ)<sup>23</sup> document listing the most relevant questions relating to the implementation of the T2S corporate actions standards. The FAQ is a living document that is continuously updated as the T2S CASG addresses new questions raised by the T2S markets.

#### Compliance status of T2S markets

As part of the latest CASG gap analysis and in line with the published AG methodology, the CASG provided a compliance status for each market (blue, green, yellow or red status – see Annex 1 for definitions). This was based on the T2S markets' current compliance with the T2S standards and the existence of detailed plans and dates for full implementation prior to migration to T2S. Regulatory and legal barriers in national markets were also taken into consideration by the CASG.

Compared with the previous CASG gap analysis, the results show that all wave 1 markets have made considerable progress towards full compliance. For example, although the Italian market was downgraded (from green to red status), it complies with approximately 95% of all standards and

<sup>22</sup> The full list of T2S corporate actions standards is available on the T2S website at <http://www.ecb.europa.eu/paym/t2s/governance/ag/html/subcompact/index.en.html>

<sup>23</sup> The latest update of the FAQ document was published in October 2015 and is available at [http://www.ecb.europa.eu/paym/t2s/progress/pdf/subcompact/t2s\\_ca\\_standards\\_faqs\\_october.pdf](http://www.ecb.europa.eu/paym/t2s/progress/pdf/subcompact/t2s_ca_standards_faqs_october.pdf)



plans to comply fully by the end of 2016. Similarly, the Portuguese market (migration wave 2) was downgraded to red status (from green), but it has committed to complying with all T2S corporate actions standards by September 2016. The impact of this non-compliance on the rest of the T2S Community is covered in the AG's impact analysis report (see Annex 3). The remaining five T2S markets with red status (non-compliance by their migration date) are also covered in Annex 3.

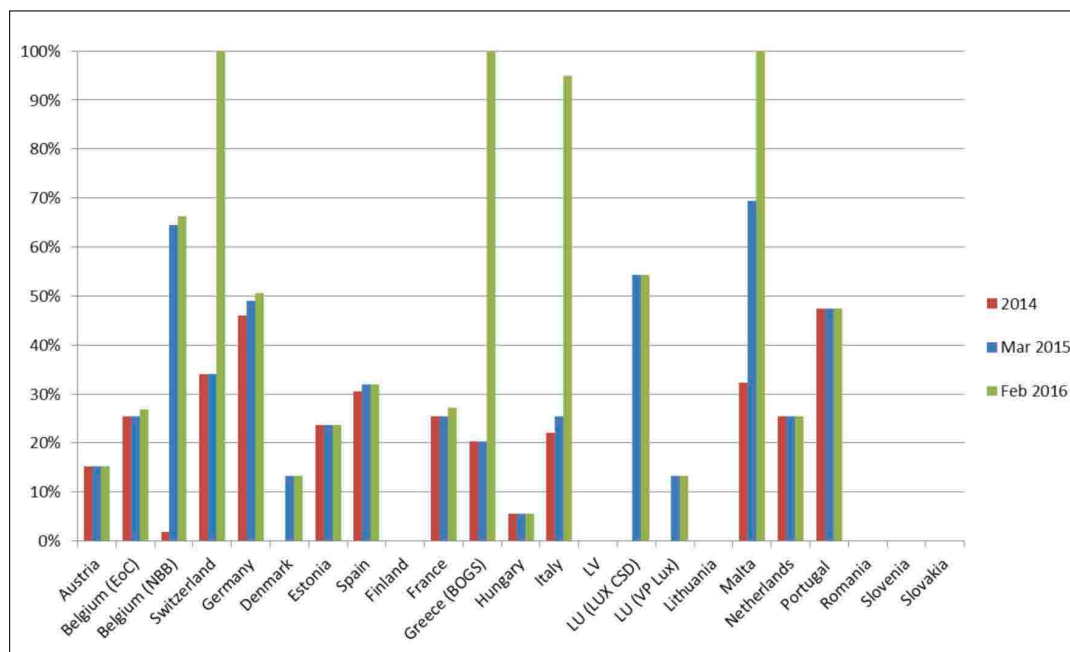
The number of markets with yellow status has remained unchanged at two (AT and LV). 11 markets have green status: a decrease from the 16 markets that were marked green previously. This is because three wave 1 markets (CH, GR (BOGS) and MT) are now fully compliant with the T2S corporate actions standards and have a blue status (full compliance in operation) and two markets (IT and PT) have been given a red status by the T2S Community.

Blue	CH, GR (BOGS), MT
Green	BE (NBB-SSS), DK, EE, ES, FI, HU, LT, LU (LUX CSD), LU (VP LUX), SI, SK
Yellow	AT, LV
Red	BE (Euroclear), DE, FR, IT, NL, PT, RO

Information input: CASG gap analysis (status Feb 2016)

For details on the compliance status colour methodology, please refer to Annex 1. For detailed explanations per T2S market, please refer to Annex 4.

**Figure 1: Comparative results for T2S markets' implementation of T2S corporate actions standards (2014-16)**



Source 2015/16 CASG gap analysis report



## Monitoring

Implementation date	From a legal/regulatory/market practice perspective: migration to T2S (depending on migration wave). From a technical perspective: start of bilateral interoperability testing (depending on migration wave).
Monitoring actors	HSG (via CASG and T2S NUGs).
Monitoring process	The CASG's gap analysis reports are the main monitoring tool for this harmonisation activity. The NUGs assist the ECB team in monitoring compliance and coordinating overall interaction with the relevant national markets.

## Legal harmonisation

Activities 7 to 10 cover issues of legal harmonisation across T2S markets. Together with the priority 2 activity relating to conflict of law issues (covered in Section 4.1), they are expected to enhance legal certainty and strengthen the legal framework for cross-CSD operations in T2S.

The three activities relating to settlement finality aim to ensure that all participating T2S “systems” have a harmonised definition of the moment of entry of transfer orders into the system (SF I), the moment of irrevocability of transfer orders (SF II), and the moment when settlement (i.e. entries into accounts) becomes irrevocable and enforceable (SF III). This is crucial for ensuring legally sound and seamless settlement at cross-CSD level.

The other priority 1 legal harmonisation activity refers to the authorisation of CSDs to outsource their settlement-related IT to a public entity (see Section 3.10).

The four activities presented below are clearly connected to already existing or ongoing international and EU legal harmonisation agreements/initiatives, such as the Settlement Finality Directive, the ESCB-CESR recommendations, the CPSS-IOSCO principles and the CSDR.

The priority 2 activity on legal certainty is linked to the possible future EU legislation in the area of securities law. The AG is of the view that this could be part of the Commission’s capital markets union agenda.

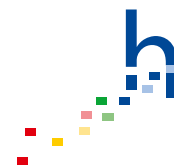
### 3.7 Settlement Finality I

#### Activity description

SF I is defined as the moment of entry of a transfer order into the system and contributes to the identification of the moment as of which a transfer order is protected against insolvency procedures. SF I is defined in and covered under:

- the Settlement Finality Directive 98/26/EC, Art. 3;
- ESCB-CESR (2009) recommendations for securities settlement systems (no 1);
- CPSS-IOSCO (2012) principles for financial market infrastructures (no 1 and 8);
- Regulation (EU) No 909/2014 (CSDR), 23 July 2014, Art. 39/2 and 48/8.

The aim of this T2S harmonisation activity is to agree on a common T2S rule regarding the moment of entry of a transfer order into the system (SF I) and to ensure compliance by all T2S markets. The Framework Agreement (Art. 21, para. 4) and the CSDR (Article 48.8) recognise the need for a harmonised CSD rule for the moment of entry of transfer orders into the system (for interoperable systems).



SF I is currently defined in the rules of all designated securities settlement systems and the payments systems of the national central banks (as required by the Settlement Finality Directive). Looking at the domestic level, all T2S markets are compliant with SF I (in accordance with the Settlement Finality Directive). However, important divergences have been identified between these national rules across the T2S CSDs.<sup>24</sup>

In order to minimise legal risks in cross-CSD transactions as well as to create a level playing field, a single definition of the moment of entry of a transfer order into the system needs to be agreed upon and implemented by all T2S markets/CSDs. A harmonised rule will protect against the spillover effects of the insolvency of a participant in another CSD (linked CSD in T2S).

### Activity status

Priority 1 – activity no 7	Definition	Monitoring	Compliance
SETTLEMENT FINALITY I (MOMENT OF ENTRY)	G	X	X

**T2S STANDARD:  
CSDs to define SF I in their systems as the moment of validation of a transfer order.**

The CSDs using the T2S platform have agreed on a harmonised moment of entry of securities transfer orders into their respective systems: this will correspond to the moment of validation of the transfer order. This validation can take place either on the T2S platform or on the CSD legacy systems (for those CSDs offering domestic matching services). The standard implements the resolution made by the T2S CSD Steering Group (CSG) in December 2013.

The Eurosystem national central banks will define SF I in their systems (i.e. TARGET 2) as currently prescribed in the TARGET2 Guideline (i.e. SF I = SF II = SF III). The CSDs and the central banks in T2S are in the process of signing a collective agreement which introduces a single SF I rule for all systems (both CSD systems and central bank systems). This will require all systems to define SF I, in their rules, as the moment of validation of a transfer order.

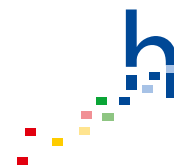
The definition status is now marked in green for this activity. All CSDs in the T2S markets have agreed to define SF I in their systems as described above, thus ensuring harmonisation of rules at cross-border level. Harmonisation in the TARGET2-related systems is also ensured by the TARGET2 Guideline's rule on SF I.

Furthermore, the T2S Community will investigate the topic in greater depth to assess whether any harmonisation is possible at T2S Community level, or at EU level, as regards the insolvency rules that deal with the treatment of instructions after declaration of SF I. The topic of CSD participants' insolvency may also be covered in the European Commission's capital markets union agenda and the work of the EPTF.

### Compliance status of T2S markets

T2S market monitoring will be launched after the signature of the collective agreement by all national central banks and CSDs.

<sup>24</sup> An ECSDA survey dated 24 October 2011 on settlement finality found that out of the 18 CSDs that participated in the survey, six CSDs consider the "point of entry" to be the moment in which the instruction (transfer order) is first received by the CSD, while 12 CSDs consider the "point of entry" to involve not only the receipt of an instruction, but also some form of validation (which varies among the CSDs). For more details, see [http://www.ecsda.eu/site/uploads/tx\\_doclibrary/2011\\_10\\_24\\_Outcome\\_ECSDA\\_Finality\\_Survey.pdf](http://www.ecsda.eu/site/uploads/tx_doclibrary/2011_10_24_Outcome_ECSDA_Finality_Survey.pdf)



## Monitoring

Implementation date	As soon as possible after the signature of the collective agreement on SF I.
Monitoring actors	HSG (T2S NUGs).
Monitoring process	Survey of NUGs and CSDs carried out by the HSG.

## 3.8 Settlement Finality II

### Activity description

Settlement Finality II (SF II) is defined as the irrevocability of a transfer order (and not of the transfer of securities itself) according to the rules of a system designated under the Settlement Finality Directive. SF II is defined in and covered under:

- Settlement Finality Directive 98/26/EC, Art. 5 (1 and 2);
- ESCB-CESR (2009) recommendations for SSSs (no 1 and 8);
- CPSS-IOSCO (2012) principles for financial market infrastructures (no 1 and 8);
- Regulation (EU) No 909/2014 (CSDR), 23 July 2014, Art. 39/2 and 48/8.

The aim of this activity is to adopt a harmonised rule for the moment when transfer orders become irrevocable, in order to eliminate the risk of transfer order revocation in a T2S cross-border environment.

The target date for T2S markets to comply with the agreed rule is their migration to T2S (depending on their migration wave).

### Activity status

Priority 1 – activity no 8	Definition	Monitoring	Compliance
SETTLEMENT FINALITY II (IRREVOCABILITY OF TRANSFER ORDERS)	G	G	G

#### **T2S STANDARD:**

**No unilateral cancellation is possible after matching status is achieved in T2S.**

The irrevocability of transfer orders in T2S is protected by the rule prohibiting the unilateral cancellation of instructions after matched status is achieved in T2S (see the T2S URD<sup>25</sup>).

CSDs should comply with the rule for the irrevocability of transfer orders as laid down in the T2S URD (i.e. no unilateral cancellation in T2S) by default, since there is no T2S functionality for unilateral cancellation after matching status is achieved in T2S. However, it is necessary to monitor that the CSDs' regulatory environments, including their rules and procedures, are updated accordingly.

This is also in line with the T2S Framework Agreement (Art. 21, para. 4), according to which contracting CSDs must make all necessary arrangements in order to adopt a harmonised definition of the irrevocability of transfer orders.

### Compliance status of T2S markets

The AG has already assigned blue status to 15 T2S markets. The remaining eight T2S markets are assigned green status indicating that these markets will also be ready before their respective migration date.

<sup>25</sup> Available at: [http://www.ecb.europa.eu/paym/t2s/pdf/2015-02-18\\_urd\\_5\\_04.pdf](http://www.ecb.europa.eu/paym/t2s/pdf/2015-02-18_urd_5_04.pdf)



Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DK, EE, ES, FI, FR, GR (BOGS), IT, LU (VP LUX), MT, NL, RO
Green	DE, HU, LU (LUX CSD), LT, LV, PT, SI, SK
Yellow	None
Red	None

*Information input: NUG survey, bilateral discussions and information from NUG chairpersons*

For details on the compliance status colour methodology, please refer to Annex 1. For detailed explanations per T2S market, please refer to Annex 4.

### Monitoring

Implementation date	T2S migration date (depending on migration wave).
Monitoring actors	HSG (T2S NUGs).
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective T2S NUGs. Monitoring is a continuous process taking place before and after each T2S market migrates to T2S.

## 3.9 Settlement Finality III

### Activity description

SF III is defined as the irrevocability of transfers (bookings in CSD accounts) according to the rules of a system designated under the Settlement Finality Directive. While no rule for SF III is set out in the Settlement Finality Directive, it is defined in and covered under:

- ESCB-CESR (2009) recommendations for securities settlement systems (no 1 and 8);
- CPSS-IOSCO (2012) principles for financial market infrastructures (no 1 and 8);
- Regulation (EU) No 909/2014 (CSDR), 23 July 2014, Art. 39/3 and 48/8.

This activity focuses on ensuring that all T2S markets comply with the common rule on the unconditionality, irrevocability and enforceability of account entries (i.e. securities bookings) in T2S.

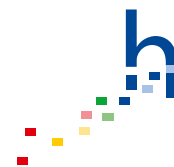
Full compliance by all T2S markets with the common SF III rule is of utmost importance: non-compliance would undermine the legal certainty of bookings in T2S accounts. It would also represent a breach of the obligations stipulated in the T2S Framework Agreement.

This is also in line with the T2S Framework Agreement (Art. 21, para. 4), according to which contracting CSDs must make all necessary arrangements in order to recognise account entries are irrevocable.

The target date for T2S markets to comply with the agreed rule is their migration to T2S (depending on their migration wave).

### Activity status

Priority 1 – activity no 9	Definition	Monitoring	Compliance
SETTLEMENT FINALITY III (IRREVOCABILITY OF TRANSFER ORDERS)	G	G	G

**T2S STANDARD:**

**According to Article 21, para. 4 of the T2S Framework Agreement, in order to facilitate legally sound, seamless cross-border DvP settlement, the regulatory/legal environments of the CSDs participating in T2S must recognise account entries in T2S as unconditional, irrevocable and enforceable.**

This is particularly relevant in cases where accounts representing legal ownership rights are maintained by the CSD in its local legacy IT system, i.e. outside T2S. In these cases – and independently of the holding model followed by each market – harmonisation of settlement finality rules would ensure that bookings in accounts maintained in T2S are irrevocable, unconditional and enforceable.

**Compliance status of T2S markets**

CSDs' compliance has been monitored since the signing of the T2S Framework Agreement in 2012.

The AG has already assigned blue status to 11 T2S markets. A further 11 T2S markets have been assigned green status, indicating that full compliance is planned by migration. One market (DK) still has to clarify some regulatory issues prior to achieving full compliance.

Blue	AT, BE (NBB-SSS), CH, ES, FI, GR (BOGS), IT, LU (LUX CSD), LU (VP LUX), MT, RO
Green	BE (Euroclear), DE, EE, FR, HU, LT, LV, NL, PT, SI, SK
Yellow	DK
Red	None

*Information input: bilateral discussions and information from NUG chairpersons*

For details on the compliance status colour methodology, please refer to Annex 1. For detailed explanations per T2S market, please refer to Annex 4.

**Monitoring**

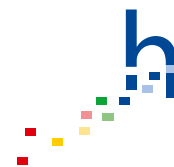
Implementation date	T2S migration date (depending on migration wave).
Monitoring actors	HSG (T2S NUGs).
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective T2S NUGs. Monitoring is a continuous process taking place before and after each T2S market migrates to T2S.

**3.10 IT outsourcing (settlement services)****Activity description**

The outsourcing of settlement services to T2S requires approval by the relevant regulator, subject to the applicable national laws and regulations. In the past, the AG identified some national legislation/regulations in the EU which could be interpreted as either prohibiting or hampering outsourcing of settlement services.

**Activity status**

Priority 1 – activity no 10	Definition	Monitoring	Compliance
IT OUTSOURCING (SETTLEMENT SERVICES)	G	G	B



The matter is addressed in Article 30(5) of the CSDR, according to which CSDs are allowed to outsource their services to public entities and, in that case, are exempted from the requirements on outsourcing provided in the CSDR.

The AG launched a survey (July 2014) to obtain clarity, under the applicable national legislation and the new CSDR provisions, on whether and how participating CSDs in T2S would be able to outsource their services to T2S. Based on the feedback received from the T2S markets, the AG agreed to assign a blue compliance status to all T2S markets and thus to the harmonisation activity itself, since no obstacles were identified.

### Compliance status of T2S markets

All T2S markets achieved blue compliance status following the adoption of the CSDR.

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, ES, FI, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK
Green	None
Yellow	None
Red	None

### Monitoring

Implementation date	Already achieved
Monitoring actors	HSG (T2S NUGs).
Monitoring process	Given that the compliance status is blue across all T2S markets, no further monitoring is required.

## 3.11 Settlement discipline regime

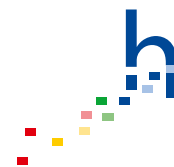
### Activity description

At present, settlement fails<sup>26</sup> are not subject to deterrent penalties in all EU markets and settlement discipline measures, when in place, differ widely between markets.

A harmonised settlement discipline regime is needed in T2S in order to avoid the risk of multiple, inconsistent or incompatible regimes that would create operational complexity, in particular for cross-CSD settlement. It is also needed at the EU level to ensure a level playing field and avoid the risk of “regulatory arbitrage”, i.e. the shift of volumes to markets with softer regimes and sanctions. Weak or non-harmonised settlement discipline regimes could also lead to a high number of failed transactions and might thus have an impact on financial stability.

In principle, the target date by which all T2S markets should have converged towards harmonised rules is their migration to T2S (depending on their migration wave). However, current regulatory developments in the EU (such as the CSDR level 2 legislation) combined with the complexity of implementation mean that, in practice, a harmonised settlement discipline regime will only be achievable for T2S markets after their migration to T2S.

<sup>26</sup> According to the CSDR, Art. 2(15), “settlement fail” means the non-occurrence of settlement, or partial settlement of a securities transaction on the intended settlement date, due to a lack of securities or cash and regardless of the underlying cause.



### Activity status

Priority 1 – activity no 11	Definition	Monitoring	Compliance
SETTLEMENT DISCIPLINE REGIME	Y	X	X

As a consequence of past initiatives by the European Central Securities Depositories Association (ECSDA) and the AG, which flagged the need for a level playing field with regard to settlement discipline, the issue has been on the EU's post-trade harmonisation agenda for several years.

Regulation (EU) No 909/2014 (the CSDR) includes important provisions on the establishment of a harmonised settlement discipline regime in the EU. The related technical standards are expected to be adopted by the EU public authorities in summer 2016 in the context of the CSDR level 2 legislation.

The AG provided detailed contributions to ESMA's consultations regarding the CSDR technical standards in February 2015<sup>27</sup> and August 2015<sup>28</sup>.

The expected timeline of adoption and entry into force of the regulatory technical standards (i.e. after the full T2S migration cycle) means that CSD participants will, for the time being, continue operating within the existing regulatory discipline frameworks of the relevant issuer CSDs. The AG is of the opinion that the prospect of the forthcoming harmonised EU settlement discipline regime, coupled with the gradual increase in cross-border activity expected after the launch of T2S, will minimise any "regulatory arbitrage" risk. Another source of reassurance for the AG is the observation that current levels of settlement failures, both before and since the T2S launch, are still very low in all T2S markets.

### Compliance status of T2S markets

Monitoring has not yet started.

### Monitoring

Implementation date	After migration to T2S is complete.
Monitoring actors	ESMA/ESCB (in accordance with the CSDR).
Monitoring process	To be defined by ESMA/ESCB (in accordance with the CSDR).

## 3.12 Settlement cycles

### Activity description

In EU markets, the settlement cycle timeline for transferable securities executed on trading venues and settled in an securities settlement system used to range from T+3 to T+2. The existence of differing settlement cycles would have had no impact on the core settlement process in T2S since T2S is neutral in this respect and can accommodate different settlement cycles.

However, the establishment of a single settlement cycle in the EU was deemed crucial for T2S participants' technical infrastructures in terms of rationalising back-office activities as well as managing cross-border corporate actions. The former non-harmonised practices rendered the management of cross-border corporate actions rather inefficient and costly, owing to the fact that the deadlines for instructing relevant messages laid down in the EU corporate actions market standards are based on the notion of the settlement cycle timeline.

<sup>27</sup> The AG's response to ESMA can be found on the AG's webpage.

<sup>28</sup> Similarly, the AG's response to ESMA's consultation on the buy-in process can also be found on the AG's webpage.





### Activity status

Priority 1 – activity no 12	Definition	Monitoring	Compliance
SETTLEMENT CYCLES	G	G	B

**The CSDR (Art. 5) established a harmonised EU settlement cycle standard up to T+2.**

### Compliance status of T2S markets

Almost all T2S markets achieved blue compliance status in October 2014, meaning that further monitoring is not required for this harmonisation activity. The Spanish market (equity segment) plans to move to a T+2 settlement cycle in Q2 2016, i.e. before its migration to T2S in September 2017.

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, FI, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK
Green	ES
Yellow	None
Red	None

### Monitoring

Implementation date	T2S migration date (depending on migration wave).
Monitoring actors	HSG (NUGs) and the competent authorities supervising trading venues.
Monitoring process	Survey launched by the ECB team in June 2014. The survey was addressed to the T2S NUGs. Given that the compliance status is blue practically across the board, no further monitoring is required after the Spanish market's migration is completed.

## CSD account structures

This topic covers the need for CSDs to offer account structures that make it possible to meet the T2S objective of efficient cross-CSD settlement.

From a T2S perspective, two harmonisation standards have been identified as essential for enabling and ensuring safe and efficient use of links in T2S. Both relate to omnibus accounts.

### 3.13 Availability of omnibus accounts

#### Activity description

This activity aims to ensure that issuer CSDs offer omnibus accounts to their foreign participants (investor CSDs and intermediaries) so as to support the concept of CSD interoperability and cross-border settlement in (or even outside) T2S.

The unavailability of omnibus accounts for foreign CSD participants would jeopardise CSD interoperability and cross-CSD settlement, and in practice hinder market access for investor CSDs and foreign intermediaries. This would be against the T2S eligibility criteria for CSDs.<sup>29</sup>

<sup>29</sup> For more information on the CSD eligibility criteria in T2S, please see [http://www.ecb.europa.eu/ecb/legal/pdf/l\\_31920111202en01170123.pdf?5e8f3155d7feefb4ce9fce8e5888b176](http://www.ecb.europa.eu/ecb/legal/pdf/l_31920111202en01170123.pdf?5e8f3155d7feefb4ce9fce8e5888b176)



### Activity status

Priority 1 – activity no 13	Definition	Monitoring	Compliance
AVAILABILITY OF OMNIBUS ACCOUNTS	G	G	B

#### T2S STANDARD:

**Issuer CSDs in T2S must offer omnibus accounts to their foreign participants (investor CSDs and intermediaries) to ensure interoperability and efficient cross-CSD settlement.**

### Compliance status of T2S markets

All T2S markets have achieved blue compliance status, meaning that no further monitoring is required for this harmonisation activity.

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, ES, FI, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK
Green	None
Yellow	None
Red	None

*Information input: HSG Survey and bilateral discussions.*

For details on the compliance status colour methodology, please refer to Annex 1. For detailed explanations per T2S market, please refer to Annex 4.

### Monitoring

Implementation date	Already achieved.
Monitoring actors	HSG (T2S NUGs).
Monitoring process	<b>Given that the compliance status is blue across the board, no further monitoring is required.</b>

## 3.14 Restrictions on omnibus accounts

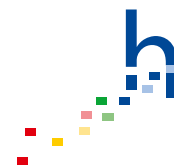
### Activity description

The objective of this activity is to ensure that issuer CSDs, in addition to offering foreign participants the possibility to open omnibus accounts (see previous section), also provide appropriate services (e.g. related to withholding tax or proxy voting) on those accounts, as required by their participants.

The unavailability of such services is usually replaced by mandatory account segregation rules in the issuer CSDs. These rules have to be propagated by investor CSDs and other intermediaries throughout the holding chain, including in the CSD link arrangements.

If appropriate services are not attached to omnibus accounts, it would represent an obstacle to CSD interoperability and cross-CSD settlement in (or even outside) T2S, as well as to market access for foreign intermediaries.

<sup>21</sup> For more information on the CSD eligibility criteria in T2S, please see [http://www.ecb.europa.eu/ecb/legal/pdf/\\_31920111202en01170123.pdf?5e8f3155d7feefb4ce9fce8e5888b176](http://www.ecb.europa.eu/ecb/legal/pdf/_31920111202en01170123.pdf?5e8f3155d7feefb4ce9fce8e5888b176).



This activity focuses on restrictions placed on the service offering of the issuer CSD by issuer market practices, and fiscal and regulatory obligations. The activity does not look at restrictions with respect to account structure that are placed on end investors, and their intermediaries, by regulatory authorities of the country of the investor.

T2S markets are to comply with this harmonisation standard by the time they migrate to T2S.

### Activity status

Priority 1 – activity no 14	Definition	Monitoring	Compliance
RESTRICTIONS ON OMNIBUS ACCOUNTS	G	G	Y

#### T2S STANDARD:

**To make full interoperability, cross-CSD settlement and market access possible in T2S, issuer CSDs in T2S must provide appropriate services on omnibus accounts to foreign participants, as required by participants (e.g. withholding tax and proxy voting). These omnibus accounts should also include, as an option, holdings of domicile and non-domicile investors.**

### Compliance status of T2S markets

While omnibus accounts are offered in all T2S markets, as an option, to investor CSDs and foreign intermediaries, restrictions remain in some markets on the mandatory segregation per investor of all (or some) domicile investors' holdings at CSD level.

T2S markets that still have restrictions on the use of omnibus accounts are assigned yellow compliance status. In these markets, the resolution of these issues depends on regulatory and/or legal changes. Despite this, these markets are not assigned red status because cross-CSD settlement and investor CSD services are still possible for non-domicile investors/intermediaries (though subject to restrictions).

The monitoring results in this report show that two additional T2S markets (FR and BE) impose mandatory account segregation rules on their foreign participants. In the absence of a European-wide agreement on issues such as withholding tax and registration procedures, these partially compliant statuses are expected to remain.

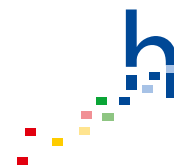
Blue	AT, BE (Euroclear), CH, DE, DK, EE, ES, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI
Green	None
Yellow	BE (NBB SSS), FI, FR, SK
Red	None

*Information input: HSG surveys and bilateral discussions.*

For details on the compliance status colour methodology, please refer to Annex 1. For detailed explanations per T2S market, please refer to Annex 4.

### Monitoring

Implementation date	T2S migration date (depending on migration wave).
Monitoring actors	ECB team, T2S NUGs.
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective T2S NUGs. Monitoring is a continuous process taking place before and after each T2S market migrates to T2S.



### 3.15 Securities account numbers

#### Activity description

The objective of this activity is for T2S CSDs to designate a harmonised number for the securities accounts in T2S. The purpose is to build logic into the account numbers in order to facilitate identification of account holders and providers.

Compliance with the agreed standard must be achieved by all T2S markets in time for their migration to T2S (depending on their respective migration wave). CSDs should nonetheless be able to participate in T2S testing using the agreed numbering standard.

#### Activity status

Priority 1 – activity no 15	Definition	Monitoring	Compliance
SECURITIES ACCOUNT NUMBERS	G	G	G

#### T2S STANDARD:

**In securities account numbering, CSDs must use a four-digit BIC to identify parties of CSDs, plus 31 digits of free text.**

#### Compliance status of T2S markets

Based on the information provided by the T2S NUGs, in addition to all of the markets that have already migrated, BE (NBB-SSS) and FI are also operating in full compliance. The remaining T2S markets have established plans for achieving full compliance by the time of their migration to T2S.

Blue	BE (NBB-SSS), CH, FI, GR (BOGS), IT, MT, RO
Green	AT, BE (Euroclear), DE, DK, EE, ES, FR, HU, LT, LU (LUX CSD), LU (VP LUX), LV, NL, PT, SI, SK
Yellow	None
Red	None

#### Monitoring

Implementation date	Migration to T2S (depending on migration wave).
Monitoring actors	HSG (T2S CSG).
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective T2S NUGs. Monitoring is a continuous process taking place before and after each T2S market migrates to T2S.

### 3.16 Cash account numbers

#### Activity description

The objective of this activity is for T2S cash account providers to designate a harmonised number for the dedicated cash accounts in T2S. The purpose is to build logic into dedicated cash account numbering in order to facilitate identification of account holders and providers.

Compliance with the agreed standard must be achieved by all T2S markets in time for migration to T2S (depending on their respective migration wave). T2S markets should nonetheless be able to participate in bilateral interoperability testing, multilateral testing and community testing using the agreed standards.



### Activity status

Priority 1 – activity no 16	Definition	Monitoring	Compliance
CASH ACCOUNT NUMBERS	G	G	G

#### T2S STANDARD:

**The dedicated cash account numbering standard includes 34 characters (one to designate the cash account, two for the country, three for the currency code, 11 for the BIC and 17 characters of free text for the account holder).**

Example: CFREURBANKFRPPXXXMAIN-DCA-ACCOUNT CDEEURBANKDEFF123DCA CLIENT ALPHA

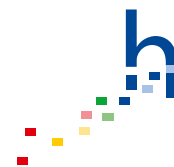
### Compliance status of T2S markets

Based on the information provided by the T2S NUGs, nine T2S markets are already in full compliance with the T2S standard. The remaining markets have established plans for achieving full compliance by the time of their migration to T2S.

Blue	DE, GR (BOGS), DK, ES, FR, IT, MT, NL, PT, RO
Green	AT, BE (Euroclear), BE (NBB-SSS), EE, FI, LT, LU (LUX CSD), LU (VP LUX), LV, SI, SK
Yellow	None
Red	None

### Monitoring

Implementation date	Migration to T2S (depending on migration wave).
Monitoring actors	HSG (national central banks).
Monitoring process	HSG survey with national central banks in May 2013 and subsequent information provided by the T2S NUGs. Additional information received by the ECB team in the context of the client readiness monitoring process is also taken into account.



## 4 T2S harmonisation activities – priority 2

*Priority 2 activities are not essential to ensure safe and efficient cross-CSD settlement in T2S, but they are key for enhancing the competitive environment and the efficiency of T2S, and could continue to be pursued after the T2S launch.*

### 4.1 Location of securities accounts/conflict of law

#### Activity description

The issue of the location of accounts/conflict of law refers to the law applicable to the transfer of securities and to CSD securities accounts. This harmonisation activity focuses on the second aspect. Clarity on the law applicable to securities accounts is important for T2S because the securities accounts in T2S remain legally attributed to the CSD, regardless of the physical location of the IT infrastructure.

The conflict of law topic may also be relevant for another post-trade harmonisation issue, namely the freedom of issuance. As put forward in the CSDR, issuers should have the right to issue their securities in non-domicile CSDs. This right may lead to an increase in the instances of conflicts of law, when non-domicile issuers decide to issue their securities in the issuer CSD.

#### Activity status

Priority 2 – activity no 17	Definition	Monitoring	Compliance
LOCATION OF SECURITIES ACCOUNTS/CONFLICT OF LAW	R	X	X

Although the Eurosystem and the T2S Community still support further harmonisation in this field, the AG came to the conclusion that this activity can continue to be pursued even after the launch of T2S.

Nevertheless, a harmonised framework should continue to be pursued and in this regard, possible EU legislation might be better placed to deliver harmonisation in this area, its scope not being limited to CSDs (but extending to other financial institutions involved in the issuance, trading and post-trading of securities). The Commission's current capital markets union initiative could create the right momentum to find a solution to this long-standing issue.

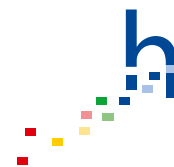
Following its contribution to the CMU green paper consultation (13/05/2015)<sup>30</sup>, the AG ran a survey with the T2S NUGs in order to identify concrete examples of conflicts of law in the T2S markets. The findings of this survey show that although the T2S NUGs did not report any concrete cases, there are important legal divergences in national jurisdictions, namely different transposition of the Settlement Finality Directive and insolvency rules, recognition of the "renvoi" concept and national criteria for determining the "location of an account or an institution".

The AG also agreed that, since the launch of T2S may lead to more visibility and a higher impact of specific conflicts of law, this survey may need to be repeated in a few years from now once users have more experience with T2S.

The CMU action plan recognises the need "to clarify which national law applies to any given cross-border securities transaction. To this end, the Commission plans to enhance and broaden existing rules in the field. A modernisation of the law is even more important in view of the expected increase in cross-border securities transactions stimulated by the launch of T2S."<sup>31</sup>

<sup>30</sup> Available at: [http://www.ecb.europa.eu/paym/t2s/progress/pdf/ag/20150513\\_ag\\_response\\_to\\_cmu\\_consultation.pdf](http://www.ecb.europa.eu/paym/t2s/progress/pdf/ag/20150513_ag_response_to_cmu_consultation.pdf)

<sup>31</sup> See Section 6.1, page 23, of the CMU action plan, available at [http://ec.europa.eu/finance/capital-markets-union/docs/building-cmu-action-plan\\_en.pdf](http://ec.europa.eu/finance/capital-markets-union/docs/building-cmu-action-plan_en.pdf)



### Compliance status of T2S market

Monitoring has not yet started.

#### Monitoring

Implementation date	Pending potential EU legislation on securities law.
Monitoring actors	Pending potential EU legislation on securities law.
Monitoring process	Pending potential EU legislation on securities law.

## 4.2 Corporate actions market standards

### Activity description

The Market Standards for Corporate Actions Processing were drawn up by an industry working group (the CAJWG) under the aegis of the European Commission's CESAME2 group. They were endorsed by relevant industry bodies during the summer of 2009. A revised version of the standards was issued in 2012.

These market standards provide the basis for the T2S corporate actions standards (see Section 3.6). In turn, one of the guiding principles underpinning the market corporate actions standards is that they "are beneficial for the efficiency of T2S".<sup>32</sup>

Following the second T2S harmonisation progress report (3 January 2012), the AG agreed that T2S markets should comply with the CAJWG standards. The status of markets' compliance with the CAJWG standards is monitored by the CAJWG and the E-MIG.

### Activity status

Priority 2 – activity no 18	Definition	Monitoring	Compliance
CORPORATE ACTIONS MARKET STANDARDS (CAJWG)	G	G	Y

#### T2S STANDARD:

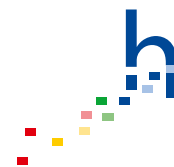
**T2S markets should comply with the market corporate actions standards defined by the CAJWG.**

From a T2S perspective, the target date for compliance by T2S markets is migration to T2S (depending on their respective migration wave) since this is related to the compliance with the T2S corporate actions standards. T2S markets should nonetheless be able to participate in bilateral interoperability testing, multilateral testing and community testing in compliance with the corporate actions market standards.

### Compliance status of T2S markets

The Broad Stakeholders Group (BSG) and the E-MIG run a biannual survey on EEA markets' compliance with the corporate actions market standards. Responsibility for the actual implementation of the standards by market participants rests at local level with the national market implementation groups (MIGs). Coordination and monitoring at European level is ensured by the BSG. Progress in implementing the standards is ultimately reported to the European Commission. The results are also shared with the T2S Programme Office and are the basis for assessing T2S markets' compliance in the context of the T2S harmonisation progress reports.

<sup>32</sup> For more information, see the relevant section of the website of the European Banking Federation.



Although the AG is not involved in maintaining or monitoring the corporate actions market standards, it receives information from the E-MIG on the T2S markets' statistical compliance.

The compliance status assessment for the corporate actions market standards is based on a percentage implementation status and is assigned by the AG as follows: 0-40% implementation corresponds to a red status; 41-70% is given yellow status; 71-99% is green; and full compliance with no further monitoring required translates into blue.<sup>33</sup> It should be clarified that the AG is not in a position to make a detailed analysis of the technical and regulatory barriers present in the T2S markets (as is the case with the T2S corporate actions standards analysis – see Section 3.6).

Only 19 T2S markets/CSDs responded to the 2015 E-MIG survey. For T2S markets (NBB SSS, LUX CSD, VP LUX, SK) that did not provide any response to the E-MIG survey, the compliance assessment has been changed to "R – No info", based on a decision by the HSG. Out of the five wave 1 markets, only Italy and Greece (BOGS) were able to achieve full compliance with the standards by the time of their migration to T2S. For the other wave 1 markets, gradual progress towards full compliance with the standards can be observed. Moreover, there is increased awareness of the dependency between the two implementation processes (T2S and corporate actions market standards).

Blue	GR (BOGS), IT
Green	BE (Euroclear), CH, DE, DK, ES, FR, LV, MT, NL, PT
Yellow	AT, EE, FI, RO
Red	BE (NBB-SSS), HU, LT, LU (LUX CSD), LU (VP LUX), SI, SK

*Information input: BSG/E-MIG Survey (2015). Markets for which September 2015 survey results are available are: AT, BE (Euroclear), CH, DE, DK, EE, ES, FI, FR, HU, IT, LT, LV, MT, NL, PT, RO and SI.*

For detailed explanations per T2S market, please refer to Annex 4.

### Monitoring

Implementation date	Relevant for T2S: migration to T2S (depending on migration wave).
Monitoring actors	BSG (E-MIG).
Monitoring process	BSG biannual surveys with MIGs.

## 4.3 Place of issuance

### Activity description

This activity relates to the restrictions that are in place in national laws or market rules in EU countries as regards the place of issuance of securities. Such restrictions represent a barrier for issuers when choosing infrastructures and service providers.

This barrier to the freedom of choosing the issuer CSD does not directly affect T2S and it entails no operational/legal risks for the migration to or operation of the single platform. Nevertheless, it has an impact on the competition for issuer CSD services in the respective markets.<sup>34</sup> It also constitutes a barrier to cross-border securities investment in the EU and to the creation of a single capital market in the EU.

<sup>33</sup> The E-MIG monitors and reports compliance with 68 prioritised standards (out of a total of 107 standards).

<sup>34</sup> This issue was raised by the Task Force on smooth cross-CSD settlement, the predecessor of the TFAX and XMAP, in its final report to the AG in June 2011, in particular in the section concerning access and interoperability issues. The task force's report is available on the T2S website at <http://www.ecb.int/paym/t2s/governance/ag/html/mtg14.en.html>





### Activity status

Priority 2 – activity no 19	Definition	Monitoring	Compliance
PLACE OF ISSUANCE	Y	X	X

Provisions on the removal of barriers to choosing the place of issuance are included in the CSDR (Art. 49). The AG took note that the proposals for the CSDR implementing technical standards, published by ESMA on 28 September 2015, include provisions regarding the criteria for CSDs to assess issuer requests for access or for their securities to be recorded in the CSD's systems.<sup>35</sup> In order for the "receiving" CSD, and its competent authority, to refuse access to the CSD services, they should be able to establish that the "requesting" issuer does not comply with these requirements.<sup>36</sup> The ESMA draft implementing technical standards also include the procedural requirements for refusal of access and the possibility to involve ESMA in this process.<sup>37</sup>

The AG has decided that the issue should be reassessed once the CSDR level 2 legislation is finally adopted by the EU authorities. This is due by summer 2016. T2S stakeholders will assess whether the green definition status will be achieved once the related level 2 legislation is in place, or whether further harmonisation work will be required to achieve this status.

The Commission's CMU action plan (published on 30 September 2015) highlights the need to review the remaining Giovannini (or other new) barriers to cross-border clearing and settlement. Some of these barriers have an impact on the freedom of issuance topic and could be addressed in this context. The review is expected to be completed by the end of 2017.

### Compliance status of T2S markets

Monitoring has not yet started.

### Monitoring

Implementation date	Pending CSDR level 2 legislation.
Monitoring actors	European Commission and national regulators (pending CSDR level 2 legislation).
Monitoring process	European Commission and national regulators (pending CSDR level 2 legislation).

## 4.4 Withholding tax procedures

### Activity description

Giovannini barrier 11 relates to the domestic nature of withholding tax regulations in the EU and the resulting disadvantages for non-domestic intermediaries. It is usually the case that relief at source can only be granted with the help of an entity that has tax withholding responsibilities. National tax rules reserve tax withholding responsibilities for local intermediaries and thus "force" foreign intermediaries to use local fiscal agents.

<sup>35</sup> See Annex II (Chapter XII, Section I, Article 88) to the Final Report on the draft technical standards under the CSDR, available at [https://www.esma.europa.eu/sites/default/files/library/2015/11/2015-esma-1457\\_-\\_annex\\_ii\\_-\\_csdr\\_ts\\_on\\_csd\\_requirements\\_and\\_internalised\\_settlement.pdf](https://www.esma.europa.eu/sites/default/files/library/2015/11/2015-esma-1457_-_annex_ii_-_csdr_ts_on_csd_requirements_and_internalised_settlement.pdf)

<sup>36</sup> According to the draft implementing technical standards, these criteria should establish whether the "requesting" issuer complies with the legal requirements of the "receiving" CSD. In addition, the issuer should guarantee that the securities have been constituted in a manner that enables the receiving CSD to ensure the integrity of the issue. Finally, the issuer must hold sufficient financial resources to fulfil its contractual obligations towards the CSD.

<sup>37</sup> See Annex II (Chapter XII, Section 2, Article 89) to the Final Report on the draft technical standards under the CSDR, available at [https://www.esma.europa.eu/sites/default/files/library/2015/11/2015-esma-1457\\_-\\_annex\\_ii\\_-\\_csdr\\_ts\\_on\\_csd\\_requirements\\_and\\_internalised\\_settlement.pdf](https://www.esma.europa.eu/sites/default/files/library/2015/11/2015-esma-1457_-_annex_ii_-_csdr_ts_on_csd_requirements_and_internalised_settlement.pdf)



As a consequence of this barrier:

- the impact of tax relief procedures on an investment decision and its return can be significant, meaning investors may be incentivised to invest locally in order to avoid dealing with complex and costly tax relief and reclaim procedures;
- remote access to issuer CSDs by foreign intermediaries may be discouraged since foreign intermediaries are at a disadvantage vis-à-vis local ones;
- the location of the issuer CSD could potentially be restricted to local CSDs.

This situation represents a burden for the industry and investors (both in and outside T2S markets). It penalises cross-border investment, disrupts post-trade processes, increases the cost of cross-border trading and is, ultimately, fundamentally incompatible with a single European securities market.

Following the report by the Clearing and Settlement Fiscal Compliance expert group (FISCO), in October 2009 the European Commission published its Recommendation on withholding tax relief procedures<sup>38</sup>, which outlines how EU Member States could make it easier for investors resident in one Member State to claim entitlements to relief from withholding tax on securities income (mainly dividends and interest) received from another Member State (relief at source). The Commission's Recommendation also suggests measures to eliminate tax barriers for the securities investment activities of financial institutions. A Commission services study<sup>39</sup> shows that, at present, the costs related to the current reclaim procedures are estimated at €1.09 billion annually, while the amount of foregone tax relief is estimated at €5.47 billion annually.

No substantial risks to T2S operations have been identified in the absence of a resolution on this topic. Nevertheless, the AG is of the opinion that further delays may have an impact on settlement efficiency and cross-border access issues in the affected markets.

### Activity status

Priority 2 – activity no 20	Definition	Monitoring	Compliance
WITHHOLDING TAX PROCEDURES	R	X	X

In 2013 T-BAG, the expert group created to follow up on the Commission's Recommendation, issued its final report to the Commission regarding workable solutions to implement the principles outlined in the earlier Commission recommendation.<sup>40</sup>

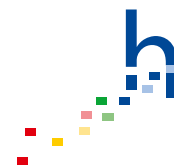
During the course of 2014, the HSG ran a fact-finding exercise with the T2S NUGs to identify whether the recommendations made by T-BAG had been taken into consideration by the T2S markets (national authorities and market actors). The results showed that the implementation of T-BAG's recommendations was not a priority for most of the T2S markets. In addition, a number of T2S NUGs responded that the recommendations required further work and needed to be revisited and updated.

The AG has agreed that any further initiatives in this area can only come from the EU public authorities (possibly a new legislative initiative by the new Commission). In this context, the AG welcomes the fact that the CMU action plan lists further work on withholding tax procedures as

<sup>38</sup> See the European Commission's Recommendation (COM (2009) 7924 final).

<sup>39</sup> The study on "The Economic Impact of the Commission Recommendation on Withholding Tax Relief Procedures and the FISCO Proposals" and other background documents related to fiscal compliance procedures are published on the Europa website and can be accessed via the following links: [http://ec.europa.eu/internal\\_market/financial-markets/clearing/compliance\\_en.htm](http://ec.europa.eu/internal_market/financial-markets/clearing/compliance_en.htm); [http://ec.europa.eu/taxation\\_customs/resources/documents/common/whats\\_new/C\(2009\)7924\\_en.pdf](http://ec.europa.eu/taxation_customs/resources/documents/common/whats_new/C(2009)7924_en.pdf)

<sup>40</sup> The T-BAG report is available on the European Commission's website.



one of the priority areas for further action: “To encourage Member States to adopt systems of relief-at-source from withholding taxes and to establish quick and standardised refund procedures, the Commission will promote best practice and develop a code of conduct with Member States on withholding tax relief principles.”<sup>41</sup>

To build on this political momentum and further encourage Member States to simplify withholding tax procedures, the Commission is seeking to further demonstrate the economic impact of burdensome withholding tax procedures, which would reinforce the economic rationale for tackling the issue. In parallel, the Commission services are launching an exercise to determine what good practices in this area already exist in Member States and are starting to develop a code of conduct on withholding tax relief principles. The Commission has set the end of 2017 as a target for putting a best practice and/or code of conduct in place. The AG contributed to this exercise in March 2016 by collecting relevant stock-taking information from the T2S markets.

### Compliance status of T2S markets

Monitoring has not started yet.

#### Monitoring

Implementation date	To be defined.
Monitoring actors	To be defined.
Monitoring process	To be defined.

## 4.5 Cross-border shareholder transparency and registration procedures

### Activity description

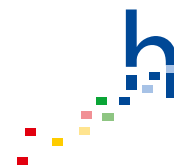
This activity covers the two connected areas of cross-border shareholder transparency and the registration procedures<sup>42</sup> linked to the issuer CSD operating and regulatory frameworks.

Concerning **shareholder transparency** for registered securities, in most EU countries there are efficient models for identifying domestic shareholders. However, there is no harmonised European model for enabling issuers to identify their owners in a cross-border environment. Issuers have therefore highlighted that, as a consequence of increased cross-border activity in T2S, shareholder transparency issues might emerge across borders. A key concern is how to retrieve specific holders’ information via the omnibus account in CSD link arrangements. The AG agreed that the resolution of this issue should be pursued, but without affecting the timely delivery or the current scope of T2S services. Hence, this activity is considered as priority 2. One of the resolutions to be considered in future releases of T2S could potentially include a centralised solution via the T2S platform.

One determining aspect relating to the disclosure of shareholders is the **registration rules and procedures within which** the issuer CSD operates. Registration procedures for certain securities have long been recognised as one of the most difficult and complex areas for harmonisation in some jurisdictions. Procedures are usually based on long-standing legal and regulatory rules (e.g. regarding the owner of a registered instrument or the investor’s rights regarding the same asset). Registration processes, and the mechanisms used to transmit registration information, vary very considerably between European countries. They are particularly complex and can in some cases affect both the issuance/central safekeeping services of a CSD, as well as settlement services.

<sup>41</sup> COM(2015) 468/30.9.2015, Action Plan on Building a Capital Markets Union, page 25.

<sup>42</sup> The registration procedure is the process of updating a register (managed by a registrar) that contains information on the identity (name, address, etc.) of shareholders in a company.



The AG agrees that if registration procedures remain non-harmonised, this may have a negative effect on the efficiency of cross-CSD settlement in T2S. It could also affect market access, which is particularly important for investor CSDs in T2S.

### Activity status

Priority 2 – activity no 21	Definition	Monitoring	Compliance
CROSS-BORDER SHAREHOLDER TRANSPARENCY AND REGISTRATION PROCEDURES	R	X	X

This issue of **shareholder transparency** was addressed in the early stages of the T2S project by a dedicated T2S group (Task Force on Shareholder Transparency)<sup>43</sup> set up by the AG in December 2009. The task force presented its final report to the AG in March 2011. The report included a description of possible decentralised and centralised technical models (one of the options being the T2S platform) for exchanging shareholder information on a cross-border basis. The conclusions of the task force were supported by the vast majority of the AG.

Leaving aside the centralised model for possible consideration for a future release of T2S, the AG used the suggestions contained in the report to invite a number of actors to work on possible decentralised solutions. Proposals put forward were: the creation of an ISO disclosure message standard; an amendment to the Transparency Directive; and a possible market practice for exchanging shareholders' disclosure requests and responses, to be developed by the market via ECSDA. However, with the exception of ongoing work in the revision of the Shareholder Rights Directive, the relevant actors have not considered it to be a high priority and the business case potential is considered to be limited.

The AG members welcome the ongoing work on revising directive 2007/36/EC (to encourage long-term shareholder engagement)<sup>44</sup> since the current draft seems to strengthen the legal framework for enabling the transmission of shareholders' information across borders, including in a CSD link arrangement. The revised directive is expected to be adopted in 2016.

As far as the impact of heterogeneous **registration procedures** on cross-CSD settlement in T2S is concerned, the TFAX analysed this area in its 2012 report. One of the results of this work was the recommendation endorsed by the AG in February 2013 not to use T2S messages for passing on registration information. This standard is covered in Section 3.3.

However, the AG recognises that there are further important steps to be taken to achieve full harmonisation regarding how to manage registration procedures in T2S markets (especially in a cross-CSD context). Given the complexity and the regulatory/legal implications of the registration topic, the AG has raised it with the EPTG as well as in the context of its contribution to the Commission's CMU initiative.

In 2013 the EPTG identified cross-border shareholder transparency, including the connected topic of registration procedures, as one of the main action points on its current agenda. A working group on registration and shareholder identification had been set up by the EPTG to work on the matter. The follow-up to this work is expected to be undertaken by its successor, the EPTF, provided that it is confirmed that this barrier is still relevant.

<sup>43</sup> More information on the task force is available at <http://www.ecb.europa.eu/paym/t2s/governance/ag/html/subtrans/index.en.html>

<sup>44</sup> More information on <http://www.europarl.europa.eu/sides/getDoc.do?type=TA&reference=P8-TA-2015-0257&language=EN>



### Compliance status of T2S markets

Definition is not complete and no standards have been endorsed yet. Monitoring has therefore not yet started.

### Monitoring

Implementation date	Pending EPTF and CMU outcome.
Monitoring actors	Pending EPTF and CMU outcome.
Monitoring process	Pending EPTF and CMU outcome.

## 4.6 Market access and interoperability

### Activity description

The activity is fundamental for enhancing financial integration in the EU. It reflects the need for regulatory frameworks to allow CSDs to provide requesting parties (i.e. foreign and market participants, CSDs and other market infrastructures) with access to their services. It also reflects the need to provide a European framework of rules and procedures for granting or refusing this access.

The activity covers, for example, market practices or legislation that obligate or restrict the settlement of (stock exchange and/or central counterparty-cleared) transactions in a specific issuer CSD. The consequence for foreign investors, custodians and/or investor CSDs in such (issuer) markets is that access to settlement flows is restricted owing to the unfair competitive advantages established in those issuer markets. The restriction implies that entities wishing to offer settlement services on these securities need to become participants in the issuer CSD or central counterparty.

The issue has no direct impact on T2S settlement processes, but it is important for competition and CSD access conditions in T2S-relevant markets

### Activity status

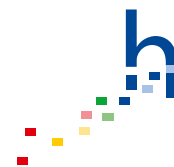
Priority 2 – activity no 22	Definition	Monitoring	Compliance
MARKET ACCESS AND INTEROPERABILITY	Y	X	X

The CSDR includes important provisions regarding market access and interoperability (Art. 51-53). The AG took note that the proposals for the CSDR implementing technical standards published by ESMA on 28 September 2015 include provisions regarding the criteria for CSDs to assess access of “requesting parties” (i.e. CSD participants, other CSDs and other infrastructures) to their systems.<sup>45</sup> If the “receiving” CSD, and its competent authority, refuse access to the CSD services, they should be able to establish that the requesting party does not comply with these requirements.<sup>46</sup> The draft implementing technical standards also include the procedural requirements for refusal of access and the possibility to involve ESMA in this process.<sup>47</sup>

<sup>45</sup> See Annex II (Chapter XII, Section 1, Article 88) to the Final Report on the draft technical standards under the CSDR, available at [https://www.esma.europa.eu/sites/default/files/library/2015/11/2015-esma-1457\\_-\\_annex\\_ii\\_-\\_csdr\\_ts\\_on\\_csd\\_requirements\\_and\\_internalised\\_settlement.pdf](https://www.esma.europa.eu/sites/default/files/library/2015/11/2015-esma-1457_-_annex_ii_-_csdr_ts_on_csd_requirements_and_internalised_settlement.pdf)

<sup>46</sup> According to the draft ESMA implementing technical standards, these criteria should establish whether the “requesting party” complies with the legal requirements for participation in the securities settlement system operated by the “receiving” CSD. The requesting party should also comply with the confidentiality and information requirements of the home Member State of the receiving CSD. Finally, the requesting party should hold sufficient financial resources and have the operational capacity to fulfil its contractual obligations towards the CSD.

<sup>47</sup> See Annex II (Chapter XII, Section 2, Article 89) to the Final Report on the draft technical standards under the CSDR, available at [https://www.esma.europa.eu/sites/default/files/library/2015/11/2015-esma-1457\\_-\\_annex\\_ii\\_-\\_csdr\\_ts\\_on\\_csd\\_requirements\\_and\\_internalised\\_settlement.pdf](https://www.esma.europa.eu/sites/default/files/library/2015/11/2015-esma-1457_-_annex_ii_-_csdr_ts_on_csd_requirements_and_internalised_settlement.pdf)



The AG has decided that the issue should be reassessed once the CSDR level 2 legislation is finally adopted by the EU authorities. This is due by summer 2016.

T2S stakeholders will assess whether green definition status will be achieved once the related level 2 legislation is in place, or whether further harmonisation work will be required to achieve this status.

### Compliance status of T2S markets

Monitoring has not started yet.

#### Monitoring

Implementation date	Pending CSDR and level 2 legislation.
Monitoring actors	Pending CSDR and level 2 legislation.
Monitoring process	Pending CSDR and level 2 legislation.

## 4.7 Securities amount data

### Activity description

This activity aims to address the absence of a standardised practice across all T2S markets for defining securities amount data (face value/nominal amount vs. quantity/units) in the trading, clearing and settlement chain.

The non-standardisation of securities quantity data has no impact on T2S settlement as long as only one rule is used for each ISIN in T2S (either nominal amount (FAMT) or quantity/units (UNIT)).<sup>48</sup>

However, the current practice in some markets may create difficulties for foreign entities (investor CSDs, custodians) that wish to offer services on securities in those markets.

The objective of this activity is to ensure that all T2S markets are aligned with the EU's standard practice in time for migration to T2S (depending on their respective migration waves). T2S markets should nonetheless be able to participate in bilateral interoperability testing, multilateral testing and community testing using the agreed shared practice.

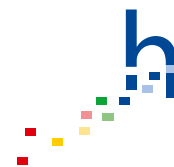
### Activity status

Priority 2 – activity no 23	Definition	Monitoring	Compliance
SECURITIES AMOUNT DATA	G	G	G

#### T2S STANDARD:

**In line with the current standard market practice in the EU, T2S markets should define securities amount data by using nominal value for debt instruments and units for non-debt instruments (i.e. debt instruments in FAMT and equities in UNIT).**

<sup>48</sup> For each T2S settlement instruction, T2S verifies whether the type of settlement amount in the settlement instruction (face amount or number of units) matches the type of amount as defined for the given ISIN in the T2S static data. This makes it impossible for a T2S actor to instruct T2S both in nominal amount (FAMT) and units (UNIT) for the same ISIN. T2S actors should select in advance, and for a given ISIN, only one of these settlement amount types.



### Compliance status of T2S markets

Based on the information provided by the T2S NUGs, all T2S markets either comply fully with the standard or plan to do so by the time of their migration to T2S.

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, ES, FI, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), MT, NL, RO
Green	LV, PT, SI, SK
Yellow	None
Red	None

*Information input: NUG survey and bilateral discussions*

For details on the compliance status colour methodology, please refer to Annex 1. For detailed explanations per T2S market, please refer to Annex 4.

### Monitoring

Implementation date	Migration to T2S (depending on migration wave).
Monitoring actors	HSG (T2S NUGs).
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective T2S NUGs. Monitoring is a continuous process taking place before and after each T2S market migrates to T2S.

## 4.8 Portfolio transfer

### Activity description

The TFAX analysis<sup>49</sup> revealed obstacles in the context of portfolio transfers<sup>50</sup> requiring further harmonisation efforts in T2S markets. Currently, each T2S market has its own requirements in terms of the information to be provided by the delivering custodian to the receiving custodian during a portfolio transfer.

In view of increasing cross-border business and cross-border portfolio transfers, this is likely to lead to a high level of complexity in information gathering and maintenance for CSDs and CSD participants involved in portfolio transfers. In the T2S context, this would lead to the manifestation of additional complexities in terms of information gathering and maintenance for the involved actors.

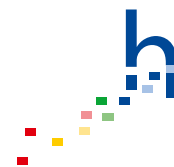
The T2S Community has agreed, in line with the TFAX recommendation, that the information required by the receiving custodians should be harmonised to the extent possible to ensure smooth cross-CSD settlement.

### Activity status

Priority 2 – activity no 24	Definition	Monitoring	Compliance
PORTFOLIO TRANSFER	Y	X	X

<sup>49</sup> The TFAX report is available in the relevant section of the T2S website.

<sup>50</sup> Portfolio transfers (or book transfers) occur when a client changes custodian or bank.



Following the AG Chairman's letter to the European Banking Federation, the European Working Group on Portfolio Transfers (EWGPT) was set up in November 2014. Its objective is to define regional best market practices in T2S. The best practices will cover the following:

- descriptions and recommendations on the workflow and channel of information for portfolio transfer messages;
- data to be transmitted in these portfolio transfer messages;
- how portfolio transfer messages should be populated.

The working group aims to finalise a proposal for a T2S standard by the second quarter of 2016. Thereafter, a consultation will be launched, involving the T2S markets, in coordination with T2S NUGs and the European Banking Federation.

### Monitoring

Implementation date	To be defined.
Monitoring actors	To be defined.
Monitoring process	To be defined.





## Annex 1: Methodology

The following methodology is used for compiling the deliverables of the HSG to the AG (progress report, T2S harmonisation list and status update dashboard).

### Harmonisation activities

A harmonisation activity is a task that needs to be completed in order to remove a barrier to smooth cross-CSD settlement in T2S markets. Some activities are grouped under broader areas.

#### Example

Area: Legal harmonisation

Activities: SF I, SF II, SF III, outsourcing, conflicts of law

### Prioritisation of activities

The AG agreed to prioritise the T2S harmonisation work as outlined below.

**Priority 1 activities are necessary to ensure efficient and safe cross-CSD settlement in T2S. The HSG and the ECB team should focus on these activities as first priorities for resolution and implementation prior to the markets' migration to T2S.**

The fact that an activity is assigned priority 1 does not imply that the HSG will be the key definition or monitoring actor (e.g. T2S ISO messages, legal harmonisation).

**Priority 2 activities are not essential to ensure safe and efficient cross-CSD settlement in T2S, but they are key for the enhancement of the competitive environment and the efficiency of T2S, and could continue to be pursued after the markets' migration to T2S.**

### Harmonisation phases

There are three harmonisation processes/phases for each activity in the T2S harmonisation list: *definition, monitoring and implementation*. Each phase corresponds to a different aim/question.

**Definition:** This refers to the T2S (or, where relevant, wider European) standards/rules definition process. What are the standards and who is responsible for defining and endorsing them?

**Monitoring:** What is the monitoring framework and who are the actors responsible for monitoring T2S markets' compliance with the harmonisation standards/rules?

**Implementation:** This phase/process refers to the T2S markets' compliance with the relevant harmonisation standards. What is the process, and who ultimately needs to implement changes and adapt to the harmonisation standards/rules? What is the implementation status per T2S market?

### Responsible actors

For each process/phase, clear responsible actors and concrete deadlines are proposed.

- Definition actors: entities responsible for defining the standard (e.g. the AG supported by HSG/CASG in the case of the T2S corporate actions standards, T-BAG/Commission in the case of withholding tax procedures, CAJWG in the case of market corporate actions standards).
- Monitoring actors: entities responsible for monitoring that T2S markets are complying with the standard (e.g. the AG supported by HSG/CASG in the case of the T2S corporate actions standards, E-MIG in the case of the market corporate actions standards).
- Implementation actors: entities responsible for ultimately implementing changes and adapting to the standard (e.g. CSDs, their participants and perhaps regulators in the case of some T2S corporate actions standards).



### Dates

A deadline for completion is set for each phase. In most cases, the deadline for compliance coincides with the migration of each market to T2S (depending on the respective migration wave). However, for most technical standards, T2S markets/CSDs are required to be able to participate in the interoperability testing phase, as per migration wave, abiding by the agreed rules and standards in the test environment.

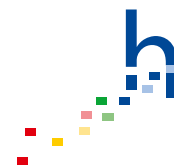
T2S Markets should comply fully with all defined and monitored standards prior to their migration to T2S.

### Status assessment

A specific colour, based on a four-colour scheme, is displayed in the status update dashboard to reflect the progress in each process (definition, monitoring and compliance). These colours/statuses are agreed at the AG level, based on the proposals of the HSG (and the input of the T2S NUGs, CSDs and other reporting actors).

**Table 7: Colour methodology in the different harmonisation processes**

Colour	Description
BLUE	<p><b>Compliance</b></p> <p>The market has achieved full compliance with the harmonisation standard.</p> <p>a. For technical standards (e.g. T2S ISO 20022 messages), this means that the T2S market is already operating according to the standard.</p> <p>b. For regulatory/legal standards (e.g. T2S settlement finality rules), this means that the relevant regulation/legislation is already in place.</p> <p><b>Further monitoring of the T2S market is no longer required.</b></p>
GREEN	<p><b>Definition</b></p> <p>The relevant stakeholder bodies (in or outside T2S) have defined and agreed/endorsed the standards for the harmonisation activity.</p> <p><b>Monitoring</b></p> <p>The monitoring actors (in or outside T2S) have defined and implemented a framework for monitoring and reporting progress on the T2S markets' compliance with the harmonisation standard. The T2S markets report regularly to the responsible stakeholder bodies.</p> <p><b>Compliance</b></p> <p>1) There are changes still pending (technical, regulatory or legal) before the T2S market can achieve full compliance with the harmonisation standard, but no obstacles have been identified to achieving full compliance by the deadline.</p> <p><i>and</i></p> <p>2) The market has established a clear/detailed plan to implement the harmonisation standard and has publicly announced deadlines for full implementation.</p> <p><b>Further monitoring of the T2S market is required.</b></p>



<b>YELLOW</b>	<p><b>Definition</b></p> <p>Open issues remain concerning the definition and agreement of the standards for the harmonisation activity by the relevant stakeholder bodies (in or outside T2S). However, stakeholders have agreed a roadmap and an approach to resolving pending issues in order to achieve agreement on the standard.</p> <p><b>Monitoring</b></p> <p>The monitoring actors (in or outside T2S) have defined and implemented a framework for monitoring and reporting progress on the T2S markets' compliance with the harmonisation standard. The T2S markets report to the monitoring bodies on an irregular basis.</p> <p><b>Compliance</b></p> <p>1) There are changes still pending (technical, regulatory or legal) before the T2S market can achieve full compliance with the given harmonisation standard, but obstacles have been identified which may threaten achievement of full compliance by the deadline.</p> <p><i>or</i></p> <p>2) The T2S market has issued a statement that it will implement the standard, but has not committed to concrete and publicly announced dates for implementation.</p> <p><b>Further monitoring of the T2S market is required.</b></p>
<b>RED</b>	<p><b>Definition</b></p> <p>Relevant stakeholder bodies (in or outside T2S) have not reached an agreement on the definition of the standard and stakeholders have not agreed a roadmap or an approach to achieving agreement on the standard. Stakeholders have not agreed a formal plan to achieve compliance with the standards.</p> <p><b>Monitoring</b></p> <p>The monitoring stakeholders have not defined and/or not implemented a framework for monitoring and reporting progress on the T2S markets' compliance with the harmonisation standard.</p> <p><b>Compliance</b></p> <p>1) The T2S market has not provided any information on its level of compliance with the standard.</p> <p><i>or</i></p> <p>2) The T2S market has decided not to (fully) comply with the standard.</p> <p><i>or</i></p> <p>3) There are changes still pending (technical, regulatory or legal) before the T2S market can achieve full compliance with the harmonisation standard and obstacles have been identified that have stopped the implementation plan of the market and/or will prevent its full implementation by the deadline.</p> <p><b>Further monitoring of the T2S market is required.</b></p>
<b>X</b>	Process not started yet

It follows from Table 7 that only blue and red statuses apply to markets that have already migrated. This is due to the fact that green and yellow statuses refer, exclusively, to future implementation plans.

### **AG monitoring methodology<sup>51</sup>**

The HSG only monitors T2S harmonisation activities for which the definition process is complete, i.e. a standard/rule/agreement has been defined and endorsed by the relevant actors. The definition may come from the AG (e.g. T2S corporate actions standards) or from EU authorities (e.g. the CSDR), but the AG ultimately endorses all T2S harmonisation standards. Only afterwards is the AG monitoring process, for the specific standard and all T2S markets, launched.

<sup>51</sup> As agreed by the AG on 27 March 2012.

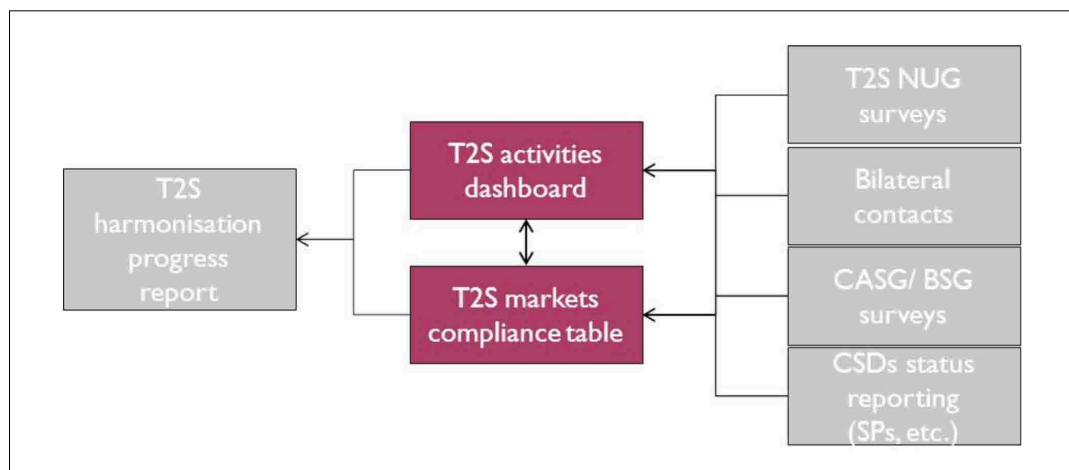
Once the definition process is complete (i.e. the AG endorses and assigns green status to the activity), the HSG – with the help of the ECB team – launches the monitoring process. The ECB team acts as the contact point or secretariat for this process. For some activities, this monitoring may be launched by external parties (e.g. the E-MIG in the case of the market corporate actions standards).

For each of the T2S harmonisation activities covered in this report, there is a section on monitoring. This section has three key elements:

- the implementation date, which describes by when the standard/agreement needs to be implemented by the T2S markets;
- the monitoring actors, i.e. who is performing the monitoring process (e.g. ECB team, NUGs, E-MIG);
- the monitoring process, which describes what the process consists of (e.g. NUG surveys, CASG surveys).

The information provided for individual T2S markets and activities may stem from more than one source. For example, T2S NUGs provided information on SF II and SF III, but this point was also covered by most T2S actors in their feasibility assessments sent to the ECB team prior to the launch of T2S. As shown in Diagram 1, the different input channels (NUG surveys, CASG/CAJWG surveys, bilateral contacts and synchronisation point (SP) reporting) feed into the different monitoring tools (T2S activities dashboard and T2S markets compliance table). The results are summarised in the T2S harmonisation progress reports published by the T2S AG on the ECB/T2S webpages.

**Diagram 1: Information channels for monitoring T2S harmonisation**



In the T2S harmonisation progress reports, the compliance statuses are presented by market (rather than by CSD). Compliance usually depends on national market practice, specificities or even regulation rather than on an individual CSD's business model. In markets with more than one CSD, the name of the relevant CSD is used in order to flag differing progress in implementation.

In the case of market corporate actions standards, colours are assigned to T2S markets based on a statistical approach, as described in section 4.2.

<sup>33</sup> As agreed by the AG on 27 March 2012.



## Annex 2: Monitored harmonisation activities per market

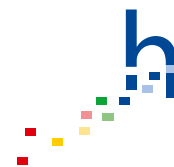
**Table 8: Colour methodology in the compliance processes**

Colour	Description
BLUE	<p>The market has achieved full compliance with the harmonisation standard.</p> <p>c. For technical standards (e.g. T2S ISO 20022 messages), this means that the T2S market is already operating according to the standard.</p> <p>d. For regulatory/legal standards (e.g. T2S settlement finality rules), this means that the relevant regulation/legislation is already in place.</p> <p><b>Further monitoring of the T2S market is no longer required.</b></p>
GREEN	<p>1) There are changes still pending (technical, regulatory or legal) before the T2S market can achieve full compliance with the harmonisation standard, but no obstacles have been identified to achieving full compliance by the deadline.</p> <p><i>and</i></p> <p>2) The market has established a clear/detailed plan to implement the harmonisation standard and has publicly announced deadlines for full implementation.</p> <p><b>Further monitoring of the T2S market is required.</b></p>
YELLOW	<p>1) There are changes still pending (technical, regulatory or legal) before the T2S market can achieve full compliance with the given harmonisation standard, but obstacles have been identified which may threaten achievement of full compliance by the deadline.</p> <p><i>or</i></p> <p>2) The T2S market has issued a statement that it will implement the standard, but has not committed to concrete and publicly announced dates for implementation.</p> <p><b>Further monitoring of the T2S market is required.</b></p>
RED	<p>1) The T2S market has not provided any information on its level of compliance with the standard.</p> <p><i>or</i></p> <p>2) The T2S market has decided not to (fully) comply with the standard.</p> <p><i>or</i></p> <p>3) There are changes still pending (technical, regulatory or legal) before the T2S market can achieve full compliance with the harmonisation standard and obstacles have been identified that have stopped the implementation plan of the market and/or will prevent its full implementation by the deadline.</p> <p><b>Further monitoring of the T2S market is required.</b></p>
R-(DATE)	<p>As above, full compliance will not be achieved by the time of the market's migration to T2S, but the NUG has agreed and provided a detailed action plan for full compliance by a specific date after migration to T2S.</p>



Table 2 [from Executive Summary]: Compliance status per T2S market (as at 18/02/2016)

T2S Markets	Priority 1													Priority 2		
	1	2	3	4	5	6	8	9	10	12	13	14	15	16	18	23
	T2S messages ISO 20022	T2S matching fields	Interaction with T2S (Registration)	Interaction with T2S (Tax procedure)	Schedule of settlement day	T2S CA standards	T2S Settlement finality II	T2S Settlement Finality III	Outsourcing IT (settlement services)	Settlement cycle	Availability of omnibus accounts	Restrictions on omnibus accounts	Securities account number	Cash account number	CA market standards (CAJWG)	Securities amount data
AT	G	G	B	B	G	Y	B	B	B	B	B	B	G	G	Y	B
BE Euroclear	G	G	B	B	G	R-?	B	G	B	B	B	B	G	G	G	B
BE – NBB-SSS	B	B	B	B	G	G	B	B	B	B	B	Y	B	G	R- No Info	B
CH	B	B	B	B	R- Mar 2016	B	B	B	B	B	B	B	B	NA	G	B
DE	G	G	B	B	G	R-?	G	G	B	B	B	B	G	B	G	B
DK	G	G	B	B	G	G	B	Y	B	B	B	B	G	B	G	B
EE	G	G	B	B	G	G	B	G	B	B	B	B	G	G	Y	B
ES	G	G	G	B	G	G	B	B	B	G	B	B	G	B	G	B
FI	B	B	B	B	G	G	B	B	B	B	B	Y	B	G	Y	B
FR	G	G	B	B	G	R-?	B	G	B	B	B	Y	G	B	G	B
GR – BOGS	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B
HU	G	G	B	B	G	G	G	G	B	B	B	B	G	NA	R	B
IT	B	B	B	B	B	R- Dec 2016	B	B	B	B	B	B	B	B	B	B
LT	G	G	B	B	G	G	G	G	B	B	B	B	G	G	R	B
LU – LUX CSD	G	G	B	B	G	G	G	B	B	B	B	B	G	G	R- No Info	B
LU – VP LUX	G	G	B	B	G	G	B	B	B	B	B	B	G	G	R- No Info	B
LV	G	G	B	B	G	Y	G	G	B	B	B	B	G	G	G	G
MT	B	B	B	B	B	B	B	B	B	B	B	B	B	B	G	B
NL	G	G	B	B	G	R-?	B	G	B	B	B	B	G	B	G	B
PT	G	G	B	B	G	R- Sep 2016	G	G	B	B	B	B	G	B	G	G
RO	B	B	B	B	B	R- Feb 2017	B	B	B	B	B	B	B	B	Y	B
SI	G	G	B	B	G	G	G	G	B	B	B	B	G	G	R	G
SK	G	R-?	G	B	G	G	G	G	B	B	B	Y	G	G	R- No Info	G



**Table 4 [from Executive Summary]: Compliance status of T2S markets in the first migration wave (as at 18/02/2016)**

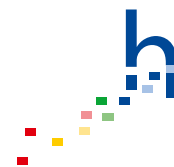
T2S Markets	Priority 1															Priority 2	
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (Registration)	4 Interaction with T2S (Tax procedure)	5 Schedule of settlement day	6 T2S CA standards	8 T2S Settlement finality II	9 T2S Settlement Finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data	
CH	B	B	B	B	R - Mar 2016	B	B	B	B	B	B	B	B	NA	G	B	
GR – BOGS	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	B	
IT	B	B	B	B	B	R - Dec 2016	B	B	B	B	B	B	B	B	B	B	
MT	B	B	B	B	B	B	B	B	B	B	B	B	B	B	G	B	
RO	B	B	B	B	B	R - Feb 2017	B	B	B	B	B	B	B	B	Y	B	

**Table 5 [from Executive Summary]: Compliance status of T2S markets in the second migration wave (as at 18/02/2016)**

T2S Markets	Priority 1															Priority 2	
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (Registration)	4 Interaction with T2S (Tax procedure)	5 Schedule of settlement day	6 T2S CA standards	8 T2S Settlement finality II	9 T2S Settlement Finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data	
BE – NBB-SSS	B	B	B	B	G	G	B	B	B	B	B	Y	B	G	R - No info	B	
PT	G	G	B	B	G	R - Sep 2016	G	G	B	B	B	B	G	B	G	G	

**Table 9: Compliance status of T2S markets in the third migration wave (as at 18/02/2016)**

T2S Markets	Priority 1															Priority 2	
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (Registration)	4 Interaction with T2S (Tax procedure)	5 Schedule of settlement day	6 T2S CA standards	8 T2S Settlement finality II	9 T2S Settlement Finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data	
BE Euroclear	G	G	B	B	G	R - ?	B	G	B	B	B	B	G	G	G	B	
DK	G	G	B	B	G	G	B	Y	B	B	B	B	G	B	G	B	
FR	G	G	B	B	G	R - ?	B	G	B	B	B	Y	G	B	G	B	
LU-VP LUX	G	G	B	B	G	G	B	B	B	B	B	B	G	G	R - No info	B	
NL	G	G	B	B	G	R - ?	B	G	B	B	B	B	G	B	G	B	

**Table 10: Compliance status of T2S markets in the fourth migration wave (as at 18/02/2016)**

T2S Markets	Priority 1														Priority 2	
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (Registration)	4 Interaction with T2S (Tax procedure)	5 Schedule of settlement day	6 T2S CA standards	8 T2S Settlement finality II	9 T2S Settlement Finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data
AT	G	G	B	B	G	Y	B	B	B	B	B	B	G	G	Y	B
DE	G	G	B	B	G	R-?	G	G	B	B	B	B	G	B	G	B
HU	G	G	B	B	G	G	G	G	B	B	B	B	G	NA	R	B
LU-LUX CSD	G	G	B	B	G	G	G	B	B	B	B	B	G	G	R - No info	B
SI	G	G	B	B	G	G	G	G	B	B	B	B	G	G	R	G
SK	G	R-?	G	B	G	G	G	G	B	B	B	Y	G	G	R - No info	G

**Table 11: Compliance status of T2S markets in the final migration wave (as at 18/02/2016)s**

T2S Markets	Priority 1														Priority 2	
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (Registration)	4 Interaction with T2S (Tax procedure)	5 Schedule of settlement day	6 T2S CA standards	8 T2S Settlement finality II	9 T2S Settlement Finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data
EE	G	G	B	B	G	G	B	G	B	B	B	B	G	G	Y	B
ES	G	G	G	B	G	G	B	B	B	G	B	B	G	B	G	B
FI	B	B	B	B	G	G	B	B	B	B	B	Y	B	G	Y	B
LT	G	G	B	B	G	G	G	G	B	B	B	B	G	G	R	B
LV	G	G	B	B	G	Y	G	G	B	B	B	B	G	G	G	G





## Annex 3: Non-compliance impact analysis

The tables below cover the T2S markets where there is at least one red compliance status for priority 1 standards (status: 18/02/2016): Belgium (Euroclear), Switzerland, Germany, France, Netherlands, Romania, Italy, Slovakia and Portugal.

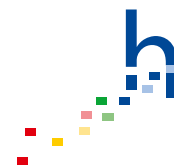
**Table 12: Summary of the AG's impact analysis (status: 18/02/2016)**

T2S standard	T2S market	Compliance gap	NUG specified milestone and completion date	Status as of 18 February 2016	Remark
Schedule of settlement day	Switzerland	Not meeting the correct sequence for processing of corporate actions events	Testing activities: <b>30 November 2015</b> Go-live in production: <b>28 March 2016</b>	Testing was completed in <b>November 2015</b> Activities are on track for final roll-out on <b>28 March 2016</b> as per the original plan.	Owing to low cross-CSD activity since joining T2S and the low "corporate action season" in Switzerland, settlement efficiency has not been affected.
T2S corporate actions standards	Germany	No concept of "record date" exists in Germany	Implementation of "record date" in the German market: <b>1 January 2016</b>	Although the German Parliament approved the necessary change in legislation in <b>November 2015</b> , the change will only enter into force on <b>1 January 2017</b> .	Owing to the legislator's decision, the record date will be implemented one year later than initially planned. This is still ahead of Clearstream's migration in February 2017.
	Germany	No usage of "CUM" flag in market claim detection (MC standard no 7)	<b>None</b>	<b>Implementation date still not available</b>	The German Market Practice Committee (MPC) agreed to monitor the handling and processing of the „CUM“ flag in other T2S markets and to further discuss with the Ministry of Finance whether or not to implement it a few months after the wave 4 migration (February 2017).
	Germany	No generation of market claims independently of the settlement of the underlying transaction (MC standard no 19)	<b>None</b>	<b>Implementation date still not available</b>  The German Market Practice Committee (MPC) is not in favour of adapting the current domestic practice for generating market claims to be in line with the T2S corporate actions standards. <sup>52</sup>	German NUG to provide the ECB team, as soon as possible, with the relevant statistics on the volumes that will be affected after the six-month period following the introduction of the "record date" and, based on that, to decide whether to comply with the T2S corporate actions standards on this.

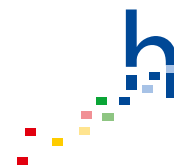
<sup>52</sup> The German market bases this decision on its interpretation of "irrevocable instructions" (matched instructions are not considered irrevocable as they can still be bilaterally cancelled).



T2S standard	T2S market	Compliance gap	NUG specified milestone and completion date	Status as of 18 February 2016	Remark
	Germany	Payments on market claims not on T2S Dedicated cash accounts (DCAs) and the management of securities fractions is not in line with the standards (MC standards no 9, 10, 11, 14 and 15; transformations standard no 11)	<b>August 2017</b>	The original deadline (March 2017) for compliance has been postponed to <b>August 2017</b> owing to the change in Clearstream's migration plan.	The non-compliance of the German market mainly relates to German ISINs.
T2S corporate actions standards	Belgium (Euroclear Belgium)	Transformations will be detected but not generated by the CSD. The CSD will not provide certain information (key dates necessary for for managing buyer protection)	Technical adaptations of Euroclear systems to fully implement CAJWG/CASG standards (Custody Service Evolution stream 6), potentially other measures. <b>31 March 2018</b>	The ESES markets are planning to commit by June 2016 to have a solution in place before the corporate action season in 2018 (31/03/2018).	
T2S corporate actions standards	France	Transformations will be detected but not generated by the CSD. The CSD will not provide certain information (key dates necessary for for managing buyer protection)	Technical adaptations of Euroclear systems to fully implement CAJWG/CASG standards (Custody Service Evolution stream 6), potentially other measures.	The ESES markets are planning to commit by June 2016 to have a solution in place before the corporate action season in 2018 (31/03/2018)	
T2S corporate actions standards	Netherlands	Transformations will be detected but not generated by the CSD. The CSD will not provide certain information (Key dates necessary for managing buyer protection)	Technical adaptations of Euroclear systems to fully implement CAJWG/CASG standards (Custody Service Evolution stream 6), potentially other measures. <b>31 March 2018</b>	The ESES markets are planning to commit by June 2016 to have a solution in place before the corporate action season in 2018 (31/03/2018)	
T2S corporate actions standards	Romania	The Romanian market does not generate/ raise corporate actions on flows for Romanian ISINs in T2S. <i>(Need for changes in the secondary legislation)</i>	Submission of new CSD rules to the national central bank and the Financial Supervisory Authority by <b>June 2016</b> . Approval of the new rules planned for <b>August 2016</b> .		As per the revised implementation plan, there is a (4-6 month) delay for both these activities compared with the earlier plan. However, there is no delay in the original full compliance date of <b>February 2017</b> .



T2S standard	T2S market	Compliance gap	NUG specified milestone and completion date	Status as of 18 February 2016	Remark
T2S corporate actions standards	Romania	The Romanian market does not generate/raise corporate actions on flows for Romanian ISINs in T2S. <i>(Need for IT changes)</i>	Finalisation of the CSD system requirements by <b>March 2016</b> . Finalisation of the new settlement system module for corporate actions processing by <b>August 2016</b> . Finalisation of internal system testing by Romanian CSD by <b>October 2016</b> . Finalisation of user system testing by <b>January 2016</b> .		Overall full compliance date remains February 2017.  However, no buffer has been built into the implementation plans.
T2S corporate actions standards	Italy	Monte Titoli does not generate market claims (MC) and transformations for over-the-counter transactions (not fully compliant with MC standard 6 and transformations standard 3).	Implementation will require an IT change: <b>December 2016</b> .	Testing of technical solution to commence by end September 2016 and go live by end 2016	This case of non-compliance is estimated to have a medium overall impact on the T2S Community.
		No user-friendly facility for CSD participants to manage the interdependence of settlement of market claims and the underlying transaction for on-exchange and CCP transactions (MC standard 23).	Implementation will require an IT change: <b>December 2016</b> .	Testing of technical solution to commence by end September 2016 and go live by end 2016	This case of non-compliance is estimated to have a medium overall impact on the T2S Community.
T2S matching fields	Slovakia	In the CSD's legacy matching engine, when processing transactions in securities held in co-ownership, the Slovakian market uses two matching fields in addition to those described in the UDFS.	No plans for compliance	<b>No implementation plan available</b> <b>No dates</b>	This case of non-compliance is estimated to have a low overall impact on the T2S Community.



T2S standard	T2S market	Compliance gap	NUG specified milestone and completion date	Status as of 18 February 2016	Remark
T2S corporate actions standards	Portugal	The Portuguese market will not generate market claims and transformations when processing one specific corporate action event (split with intermediate securities) (MC and transformations standards)	Implementation will require IT changes and testing with the market. <b>4 September 2016</b>	Testing of functionality for managing splits with intermediate securities: <b>June - 1 July 2016</b>  Community testing: <b>4 July- 1 September 2016</b>  In production: <b>4 Sept 2016.</b>	This case of non-compliance is estimated to have a low overall impact on the T2S Community.
		Key dates, needed to correctly process BP instructions, will be missing from the corporate actions announcements.	Implementation will require changes to be made by Interbolsa: <b>end May 2016.</b>	Interbolsa to migrate the necessary changes in its live system by the <b>end of May 2016</b>	This case of non-compliance is estimated to have a low overall impact on the T2S Community.



## Annex 4: Detailed monitoring information per T2S market

T2S harmonisation activities: Austria							
Activity	Sub-activity	Compliance with the relevant standards/rules	Status	Type of implementation gap	Implementation plan/date		Further comments
					Implementation plan/date	Implementation plan/date	
Priority 1							
T2S messages	1. T2S ISO 20022 messages	Not compliant	G	Straight-forward to implement	Testing readiness achieved	06/02/2017	No barriers identified for achieving full compliance before migration to T2S.
	2. T2S mandatory matching fields	Not compliant	G	Straight-forward to implement	Testing readiness achieved	06/02/2017	No barriers identified for achieving full compliance before migration to T2S.
5. T2S schedule of settlement day	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	Info source: HSG survey May 2013. Registration information is not transferred via settlement messages
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	Info source: HSG survey May 2013. Tax information is not transferred via settlement messages
6. Corporate actions T2S CA standards (59)	Market claims (28 standards) Transformations (13 standards) Buyer protection (18 standards)	Not compliant	G	Straight-forward to implement	Testing readiness achieved	06/02/2017	Info source: 2014 NUG survey. OnKB schedule will be adapted to T2S Schedule by February 2017 (migration to T2S).
		7%					
		0% 39%	Y	Major technical changes/ Market practice changes	Q2 2016	06/02/2017	Info source: 3rd CASG gap analysis survey 2015. Low rate of overall compliance. However, Austrian market has committed to comply with all T2S CA standards by the time of its migration to T2S and has provided an implementation plan. The only uncertainty remains with regards to compliance with market claims standard 13 regarding the information flow between issuer and investor. It is not clear yet whether this will be introduced on time.
Legal harmonisation	8. Settlement Finality II: Irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	Info source: T2S NUGs surveys 2011 and 2012. SP2 and bilateral input. Only bilateral cancellations are possible after matching status
	9. Settlement Finality III: Irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	Info source: SP2 and bilateral input. Market already complies with the standard
12. Settlement cycles	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.
	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	Info source: 2013 HSG survey and bilateral input. Fully compliant with Omnibus accounts availability.
	15. Securities account numbering	Not compliant	G	Straight-forward to implement	Testing readiness achieved	06/02/2017	Info source: HSG survey on T2S Securities account numbering. April-May 2013 and Q3 2013 CSD status gathering Template
Activity	16. Dedicated cash account numbering	Not compliant	G	Straight-forward to implement	Testing readiness achieved	March 2016	Info source: HSG survey on T2S DCA numbering. April-May 2013
	17. CSD account numbering	Not compliant	G	Straight-forward to implement	Testing readiness achieved	March 2016	Info source: HSG survey on T2S DCA numbering. April-May 2013
Priority 2							
18. Corporate actions	CA market standards (68)	66%	Y	For some standards there is no implementation plan as market participants have refused to follow the market practice	Q2 2016	06/02/2017	Info source: HSG/E-NUG Survey (Sep 2015). Some of the standards that were marked as implemented earlier are indicated as partly implemented in this year's assessment, bringing down the overall compliance assessment. No implementation date available for standards on 'distributions with options'. For the rest of the non-implemented standards, the implementation date is by November 2016 at the latest.
		Fully compliant	B	N/A	N/A	N/A	Info source: T2S NUGs survey and bilateral input. Full compliance with European market practice
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	Info source: T2S NUGs survey and bilateral input. Full compliance with European market practice



T2S harmonisation activities: Belgium (Euroclear)							
Activity	Sub-activity	Compliance with the standards/points	Status (Green (G), Yellow (Y), Red (R), Blue (B))	Type of implementation gap (if any) (Straight-forward to implement, Major technical change, Major regulatory change, Other)	Implementation plan/date		Further comments
					If ready for T2S testing, please provide the milestones/dates in the implementation plan.	Implementation actor(s)	
<b>Priority 1</b>							
T2S messages	1. T2S ISO 20022 messages	Not compliant	G	Straight-forward to implement	Testing readiness achieved	12/09/2016	Euroclear No relevant national implementation
	2. T2S mandatory matching fields	Not compliant	G	Straight-forward to implement	Testing readiness achieved	12/09/2016	Euroclear
	3. Interaction for registration	Fully compliant	D	N/A	N/A	N/A	N/A
	4. Interaction for tax info	Fully compliant	D	N/A	N/A	N/A	N/A
5. T2S schedule of settlement day		Not compliant	G	Straight-forward to implement	Testing readiness achieved	12/09/2016	Euroclear
5. Corporate actions T2S CA standards (C3)	Market claims (28 standards)	46%		Major technical change	Not available	Not available	Info source: SP2 and bilateral input and status gathering templates will be amended to adhere to the timing of T2S. T2S master day will be considered the master day.
	Transformations (13 standards)	23%		Major technical change			Info source: T2S CASB flow analysis non-compliance affects some of the standards. In particular, following rescheduling of ESIS market migration to the Euroclear Belgium's segment regarding the Euroclear Belgium's segment the transformations and buyer protection standards
	Buyer protection (18 standards)	0%	R	Other			Info source: T2S NUGS surveys 2013 and 2017. SP2 and bilateral input only bilateral cancellation after matching status.
Legal harmonisation	8. Settlement Finality II: Irrevocability and Entitlement Transfer Order	Fully compliant	B	N/A	N/A	N/A	Info source: T2S NUGS surveys 2011 and 2013. No barriers identified in the process.
	9. Settlement Finality III: Irrevocability of Securities Transfers	Not compliant	G	May require regulatory change	N/A	12/09/2016	Info source: 2014 HSG survey on IT outsourcing. No regulatory barrier by the Cap to the Eurosystem.
12. Settlement cycles	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	Info source: Bilateral confirmation form NUGS. Fully compliant since 6 October 2014.
	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	Info source: T2S NUGS survey and bilateral availability for the ESIS countries input. No restrictions on usage of omnibus accounts.
T2S accounts numbering	14. Restrictions on omnibus accounts	Fully compliant	D	N/A	N/A	N/A	Info source: HSG survey on T2S Securities Numbering, May 2013. No barriers identified.
	15. Securities account numbering	Not compliant	G	Straight-forward to implement	Testing readiness achieved	12/09/2016	Info source: HSG survey on T2S DCA Identifiers.
Activity	16. Dedicated cash account numbering	Not compliant	G	Straight-forward to implement	Testing readiness achieved	March 2016	Info source: April - May 2013. No barriers identified.
		Compliance (indicates level of compliance with the standards/points)	Status (Green (G), Yellow (Y), Red (R), Blue (B))	Type of implementation gap (if any) (Straight-forward to implement, Major technical change, Major regulatory change, Other)	If ready for T2S testing, please provide the milestones/dates in the implementation plan.	Implementation actor(s)	Further comments
<b>Priority 2</b>							
18. Corporate actions	CA market standards (68)	78%	G	Market practice change	Not available	Not available	Info source: BSG/EBMG Survey (Sep 2015). 53 (out of 68) standards already met. Assessment: Final implementation of stream 6 after migration to T2S - Sep 2016
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	Info source: T2S NUGS survey and bilateral data for the ESIS countries



T2S harmonisation activities: Belgium (NBB-SSS)									
Activity	Sub-activity	Compliance with the standards/rules	Status	Type of implementation gap <small>If the standards/rules are not yet implemented, please specify what the type of gap is.</small>	Implementation plan/date if standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.	Implementation actor(s)	Further comments	Priority 1	
								Ready for T2S testing	Relevant national actors for implementation
Priority 1									
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	N/A	Info source: Confirmation by BE NUG Chairperson that some of the NBB-SSS participants are currently (as of 31.01.2015) using T2S ISO20022 messages in their daily message interaction with NBB-SSS
	2. T2S mandatory matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	N/A	Info source: NUG confirmation that the market is now fully operational according to the T2S standards following implementation of the new technical platform
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2013. Registration process is paper-based. No need to include registration info in settlement messages.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2013. No additional information is requested in settlement messages for tax processing
5. T2S schedule of settlement day	5. T2S schedule of settlement day	Not compliant	G	Straight-forward to implement	Testing readiness achieved	28/03/16	NBB-SSS	N/A	Info source: SP2, SP3 and Bilateral Input and 2014 NUG survey. NBB-SSS will fully comply with the T2S schedule, whatever the final timings agreed. However, NBB-SSS has raised concerns about the short time period between IOP and SOD.
	Market claims (28 standards)	93%		Market practice change	Testing readiness achieved	28/03/16	BE NUG	N/A	Info source: 2nd CASG gap analysis survey 2015 and NUG clarification. The only barriers to full compliance with market claims standards no longer exist. NBB-SSS has raised concerns about the short time period requested to have at securities account level. Nevertheless, the Belgian market has a plan to fully comply by its migration to T2S.
	Transformations (13 standards)	100%		Market practice change					
6. Corporate actions T2S CA standards (59)	Buyer protection (38 standards)	0%							
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	N/A	Info source: NUG confirmation that the market is now fully operational according to the T2S standards following the implementation of the new technical platform in February 2015.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	N/A	Info source: NUG confirmation that the market is now fully operational according to the T2S standards following the implementation of the new technical platform in February 2015.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing. No regulatory barrier for outsourcing of settlement services by the CSD to the Eurosystem.
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	N/A	Info source: T2S NUGS survey and bilateral input. NBB-SSS offers omnibus accounts.
CSD account structures	14. Restrictions on omnibus accounts	Not compliant	Y	Market practice change	Not available	Not available	NBB-SSS	N/A	Info source: Based on the HSG decision on 22/23 October 2015. NBB-SSS requires participants to maintain two omnibus accounts based on the terms of the T2S standards. The participants are not exempt from the terms of the CSDs. The market is working on how to propagate this segregation further down the custody chain.
	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	N/A	Info source: NUG confirmation that the market is now fully operational according to the T2S standards following the implementation of the new technical platform in February 2015.
T2S accounts numbering	16. Dedicated cash account numbering	Not compliant	G	Straight-forward to implement	Testing readiness achieved	March 2016	NBB	N/A	Info source: HSG survey on T2S DCA numbering. April-May 2013.
	Activity	Compliance		Type of implementation gap <small>If the standards/rules are not yet implemented, please specify what the type of gap is (use the dropdown list).</small>	Implementation plan/date if standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.	Implementation actor(s)	Further comments		
Priority 2									
18. Corporate actions	CA market standards (49)	Not available	R - No info	Other	Not available	Not available	NBB - SSS	N/A	Info source: Information on NBB - SSS compliance is not available in the September 2015 E-OMG survey
	23. Securities amount static data	Fully compliant	B	N/A	N/A	N/A	N/A	N/A	Info source: T2S NUGS survey and bilateral input. NBB-SSS is in line with the European market practice.



T2S harmonisation activities: Switzerland (SIX SIS)										
Activity	Sub-activity	Compliance with standards/rules	Status	Type of implementation gap	Implementation plan/date		Implementation actor(s)	Further comments		
					If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the fully operational according to the T2S standard	Ready for T2S testing				
<b>Priority 1</b>										
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.		
	2. T2S mandatory matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.		
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.		
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.		
5. T2S schedule of settlement day		Not compliant	R - March 2016	Market practice change	Testing readiness achieved	28 March 2016	SIS	Info source: NUG reports February 2016. Testing activities have been successfully completed. The code is ready for rollout on 28 March 2016		
6. Corporate actions T2S CA standards (39)	Market claims (28 standards)	100%		N/A						
	Transformations (13 standards)	100%		N/A						
	Buyer protection (18 standards)	100%	B	N/A	N/A	N/A	N/A	Info source: 2nd CASG gap analysis survey 2015. Since migration to T2S, the Swiss market has become fully compliant with the T2S CA standards		
Legal harmonisation	8. Settlement Finality II: Irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.		
	9. Settlement Finality III: Irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.		
	10. Outsourcing IT (settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.		
	12. Settlement cycles	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.		
	CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
		14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
	T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
		16. Dedicated cash account numbering	N/A	N/A	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
	Activity	Sub-activity	Compliance with standards/rules	Status	Type of implementation gap	Implementation plan/date		Implementation actor(s)	Further comments	
	<b>Priority 2</b>									
18. Corporate actions	CA market standards (68)	94%	G	Straight-forward to implement	Testing readiness achieved	Final implementation date not available	SIS	Info source: BSG/EMG Survey (Sep 2015). 64 (out of 68) standards already met. Guaranteed participation date and buyer protection standards are not implemented. Voluntary reorganisation are partly implemented.		
		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.		
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.		





T2S harmonisation activities: Denmark							
Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date		Further comments
					If standards/rules are not fulfilled, please provide the implementation plan.	Implementation actor(s)	
<b>Priority 1</b>							
T2S messages	1. T2S ISO 20022 messages	Not compliant	G	Straight forward to implement	Testing readiness achieved	September 2016	VP
	2. T2S mandatory matching fields	Not compliant	G	Straight forward to implement	Testing readiness achieved	September 2016	VP
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A
5. T2S schedule of settlement day		Not compliant	G	Technical change/market practice	Testing readiness achieved	Sep-16	VP and DK NUG
		21% 15% 0%	C	Major technical change Major technical change Major technical change	Testing readiness achieved	September 2016	VP and DK NUG
6. Corporate actions T2S CA standards (59)	Market claims (28 standards) Transformations (13 standards)	21% 15% 0%	C	Major technical change Major technical change Major technical change	Testing readiness achieved	September 2016	VP and DK NUG
	Buyer protection (18 standards)						
Legal harmonisation	8. Settlement Finality II: Irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A
	9. Settlement Finality III: Irrevocability of securities transfers.	Not compliant	Y	CSD rule/regulatory/legislative approval	N/A	01/09/2016	Finanstilsynet (Danish Financial Supervisory Authority)
12. Settlement cycles	10. Outsourcing IT (settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A
		Fully compliant	B	N/A	N/A	N/A	N/A
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A
T2S accounts numbering	15. Securities account numbering	Not compliant	G	Straight forward to implement	Testing readiness achieved	12/09/2016	VP
	16. Dedicated cash account numbering	Fully compliant	B	System changes	N/A	N/A	DK NCB
Activity		Indicates level of compliance with the relevant standards/rules		Type of implementation gap	If standards/rules are not fulfilled, please provide the implementation plan.		Implementation actor(s)
					Re-apply for T2S testing		
<b>Priority 2</b>							
18. Corporate actions	CA market standards (68)	85%	G	Market Practice Change	Testing readiness achieved	September 2016	VP and Danish NUG
23. Securities amount -static data		Fully compliant	B	N/A	N/A	N/A	N/A





T2S harmonisation activities: Estonia								
Activity	Sub-activity	Compliance with standards/rules at end of period	Status <small>Green (G), Yellow (Y), Red (R), Blue (B)</small>	Type of implementation gap <small>If the standards/rules are not yet implemented, please specify what the type of gap is.</small>	Implementation progress		Further comments	
					If standards/rules are not fulfilled, please provide the timetable and actions	Implementation actor(s) <small>Relevant national actors for implementation</small>		
T2S messages	1. T2S ISO 20022 messages	Not compliant	G	Straight-forward to implement	Ready for T2S testing	18/09/2017	ECSD	Info source: SP2 and bilateral input. 2013 Q2 status in previous template. Plans for full compliance by migration date are confirmed and no issues identified by gathering template. 2013 Q2 status gathering template. Plans for full compliance by migration date are confirmed and no issues identified by gathering template.
	2. T2S mandatory matching fields	Not compliant	G	Straight-forward to implement	Testing readiness achieved	18/09/2017	ECSD	Info source: SP2 and bilateral input. 2013 Q2 status gathering template. Plans for full compliance by migration date are confirmed and no issues identified by gathering template.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG survey 2013. Estonia does not hold a security account. Settlements are done based on owner information associated with the security account number and settlement information. Settlement and registration takes place at the same time.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG survey 2013. Settlement messages are not used to pass on tax related information.
5. T2S schedule of settlement day		Not compliant	G	Straight-forward to implement	26/09/2016	18/09/2017	ECSD	Info source: T2S HSG survey 2013. Settlement messages are not used to pass on tax related information. Bilateral input and NUG survey 2014. Technical adaptations and amendments to rules and regulations of CSD are required. No barriers identified and detailed plan/roadmap is available for technical and legal, will be achieved as of migration to T2S (February 2017).
6. Corporate actions T2S CA standards (59)	Market claims (28 standards) Transformations (13 standards) Buyer protection (38 standards)	43% 15% 0%	G	Technical, market practice and CSD rules	Testing readiness achieved	18/09/2017	MIG	Info source: 2nd CASG gap analysis survey 2015. No changes in primary legislation have been identified. Commitment to achieve technical compliance by Q3 2015 and implementation in the rules of the CSD as of Q1 2017.
Legal harmonisation	8. Settlement Finality II: Irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGS surveys 2011 and 2012. SP2 and bilateral input. The local settlement system supports the same cancellation principles as T2S. Matched instruction cancellation instructions from both counterparties.
	9. Settlement Finality III: Irrevocability of securities transfers.	Not compliant	G	CSD rules change	N/A	18/09/2017	ECSD	Info source: T2S NUGS surveys 2011 and 2012. SP2, HSG 2013 survey on SF III. Planned to be updated allowing for the full recognition of the unconditional, irrevocability and enforceability of the settlement instructions (including the settlement instructions in the system) and the relevant amendments to be enforced as of T2S implementation. Plans for full compliance confirmed and no issues identified.
12. Settlement cycles	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing. Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGS survey and bilateral input.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGS survey and bilateral input.
T2S accounts numbering	15. Securities account numbering	Not compliant	G	Straightforward to implement	Testing readiness achieved	18/09/2017	ECSD	Info source: HSG survey on T2S securities account implemented by migration to T2S.
	16. Dedicated cash account numbering	Not compliant	G	Straightforward to implement	Testing readiness achieved	18/09/2017	Eesti Pank	Info source: HSG survey on T2S DCA numbering. April-May 2013
Activity	Sub-activity	Compliance with standards/rules at end of period	Status <small>Green (G), Yellow (Y), Red (R), Blue (B)</small>	Type of implementation gap <small>If the standards/rules are not yet implemented, please specify what the type of gap is (use the dropdown list).</small>	If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan. <small>Ready for T2S testing</small>	Implementation plan/date <small>Fully operational according to the T2S standard</small>	Implementation actor(s) <small>Relevant national actors for implementation</small>	Further comments
Priority 2								
18. Corporate actions	CA market standards (68)	47%	Y	Regulatory/legislative Change	Testing readiness achieved	18/09/2017	NUG/MIG	Info source: HSG/E-MIG Survey (Sep 2015). 22 (out of 68) standards already met.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGS survey and bilateral input.



T2S harmonisation activities: Spain (IBERCLEAR)						
Activity	Sub-activity	Compliance with the relevant standards/rules	Status (G, with (1), (2), and (3), or (4), (5), (6), (7), (8), (9), (10), (11), (12), (13), (14), (15), (16), (17), (18), (19), (20), (21), (22), (23), (24), (25), (26), (27), (28), (29), (30), (31), (32), (33), (34), (35), (36), (37), (38), (39), (40), (41), (42), (43), (44), (45), (46), (47), (48), (49), (50), (51), (52), (53), (54), (55), (56), (57), (58), (59), (60), (61), (62), (63), (64), (65), (66), (67), (68), (69), (70), (71), (72), (73), (74), (75), (76), (77), (78), (79), (80), (81), (82), (83), (84), (85), (86), (87), (88), (89), (90), (91), (92), (93), (94), (95), (96), (97), (98), (99), (100))	Type of implementation gap (If the standards/rules are not implemented, please specify what the type of gaps is)	Implementation plan/dates	
					If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the Fully operational according to the T2S standard	Further comments
<b>Priority 1</b>						
T2S messages	1. T2S ISO 20022 messages	Not compliant	G	Straight-forward to implement	Testing readiness achieved	18/09/2017 Info source: SP2 and bilateral input migration are confirmed and no issues identified.
	2. T2S mandatory matching fields	Not compliant	G	Straight-forward to implement	Testing readiness achieved	18/09/2017 Info source: SP2 and bilateral input migration are confirmed and no issues identified.
	3. Interaction for registration	Not compliant	G	Straight-forward to implement	27/04/2016	Info source: T2S HSG survey 2013. Specific procedure for exchanging registration information is to be developed. Post-ES information will not be used for passing on registration information. There are no barriers to implementation before migration to T2S.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	Info source: T2S HSG survey 2013. Post-ES information is not used to transfer tax information.
5. T2S schedule of settlement day		Not compliant	G	Straight-forward to implement	27/04/2016	Info source: SP2 and bilateral input and NUG survey 2014. Plans/dates for full compliance confirmed and no issues identified.
	Market claims (28 standards) Transformations (13 standards)	46%	G	Low rank legislative change/ Technical changes Major technical change		Info source: CASG gap analysis survey 2015. Changes in level 2 legislation are needed to fully comply with the standards from a regulatory perspective. Even though the legislative proposals have been adopted through the 2015, implementation of most standards will take place at the time the Spanish standards will only be implemented as a result of migration of Iberclear to T2S in 2017.
6. Corporate actions T2S CA standards (59)	Buyer protection (18 standards)	0%	G	Manual BP to be implemented	27/04/2016	Info source: CASG gap analysis survey 2015. Changes in level 2 legislation are needed to fully comply with the standards from a regulatory perspective. Even though the legislative proposals have been adopted through the 2015, implementation of most standards will take place at the time the Spanish standards will only be implemented as a result of migration of Iberclear to T2S in 2017.
		Fully compliant	B	N/A	N/A	Info source: T2S NUGs survey 2011 and T2S HSG survey 2013. No need for any changes for compliance with T2S SF II rule.
Legal harmonisation	8. Settlement Finality II: Irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	Info source: SP2 and bilateral input.
	9. Settlement Finality III: Irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	No need for any changes for compliance with T2S SF III rule.
12. Settlement cycles	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.
		Partly compliant	G	Straight-forward to implement	N/A	Info source: 2014 HSG survey on settlement cycle. Spanish fixed income securities markets (public and private debt) has migrated to T2S on 06/10/2014. For the rest of the market (equities), full compliance is planned for Q2 2016.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	Info source: T2S NUGs survey and bilateral input. Full compliance in place.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	Info source: T2S NUGs survey and bilateral input. Full compliance in place.
T2S accounts numbering	15. Securities account numbering	Not compliant	G	Straight-forward to implement	Testing readiness achieved	Info source: HSG survey on T2S securities account numbering. April- May 2013. Implementation of the standard is part of the migration to T2S.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	Info source: HSG survey on T2S DCA numbering. April- May 2013. Full compliance in place.
Activity	Sub-activity	Compliance		Type of implementation gap	Implementation plan/dates	Further comments
		Indicates level of compliance with the relevant standards/rules	Status	If the standards/rules are not yet implemented, please specify what the type of gaps is (use in the description field).	If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.	
<b>Priority 2</b>						
18. Corporate actions	CA market standards (68)	74%	G	Some standards will require major technical work and on which need regulatory change	27/04/2016	Info source: BSG/E-MIG Survey (Sep 2015). 50 (out of 68) accounts already migrated. The reform of the Spanish Registry, Clearing and Settlement System comes into effect.
		Fully compliant	B	N/A	N/A	Info source: T2S NUGs survey and bilateral input.
23. Securities amount static data		Fully compliant	B	N/A	N/A	Info source: T2S NUGs survey and bilateral input.



T2S harmonisation activities: Finland							
Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date		Further comments
					If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.	Implementation actor(s)	
Priority 1							
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	Info source: NUG response 2015. T2S version of ISO20022 message standard is in force since 1 December 2014. The Finnish market is already using these T2S messages.
	2. T2S mandatory matching fields	Fully compliant	B	N/A	N/A	N/A	Info source: NUG response 2015. T2S mandatory matching fields are already implemented since 1 December 2014. The Finnish market is already using the T2S matching fields.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used to transfer registration information.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used to transfer tax information.
5. T2S schedule of settlement day	Market claims (28 standards)	0%	G	Straight-forward to implement	Testing readiness achieved	18/09/2017	Info source: SP3 and NUG survey 2014. No barriers to implementation. However, there is an open issue regarding issuer's settlement. Discussions are ongoing with all relevant market participants.
	Transformations (13 standards)	0%	G	Straight-forward to implement	Testing readiness achieved	October 2016	Info source: 2nd CASG gap analysis survey 2015. Detailed plan to meet the standards by Q2 2016. No technical or regulatory issues remain.
	Buyer protection (18 standards)	0%	G	Straight-forward to implement	Testing readiness achieved		
Legal harmonisation	8. Settlement Finality II: Irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2014. SP3 input. Already implemented (Sept 2012)
	9. Settlement Finality III: Irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	Info source: SP2 and bilateral input. No changes for compliance with T2S SP III rule.
12. Settlement cycles	10. Outsourcing IT (Settlement )	Fully compliant	B	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.
	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	14. Restrictions on omnibus accounts	Not compliant yet	Y	Legal/regulatory	ready for testing (except specific restriction)	Not available	Info source: T2S NUG survey and bilateral input. FI investors' (equities) holdings are excluded from the omnibus account restrictions. The Ministry is planning to introduce any changes if available.
	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	Info source: NUG response 2015. Fully operational since 2 February 2015.
T2S accounts numbering	16. Dedicated cash account numbering	Not compliant	G	Straight-forward to implement	Testing readiness achieved	18/09/2017	Info source: HSG survey on T2S DCA numbering. April-May 2013 and further discussions with the Ministry will open DCA beginning 3rd migration wave.
	Activity	Compliance	Status	Type of implementation gap	Implementation plan/date	Implementation actor(s)	Further comments
Priority 2							
18. Corporate actions	CA market standards (68)	59%	Y	Straight-forward to implement	Testing readiness achieved	01/05/2016	Info source: BSG/EMIG Survey (Sep 2015). 40 (out of 68) standards already met. Finnish market is working on the manual implementation. Further information will be taken place by February 2017.
23. Securities amount	Standard	Fully compliant	B	N/A	N/A	N/A	Info source: NUG response 2015. Fully operational since 2 February 2015.



T2S harmonisation activities: France								
Activity	Sub-activity	Compliance with the relevant regulatory requirements/standards/rules	Status	Type of Implementation gap	Implementation plan/date		Implementation actor(s)	Further comments
					If standstill, please provide the timetable and various milestones/dates in the implementation plan.	Please provide the timetable and various milestones/dates in the implementation plan.		
<b>Priority 1</b>								
T2S messages	1. T2S ISO 20022 messages	Not compliant	G	Straight-forward to implement	Testing readiness achieved	12/09/2016	Euroclear FR	Info source: SP2 and bilateral input from NUG for full compliance prior to migration to T2S
	2. T2S mandatory matching fields	Not compliant	G	Straight-forward to implement	Testing readiness achieved	12/09/2016	Euroclear FR	Info source: SP2 and bilateral input from NUG has confirmed plan and dates for full compliance prior to migration to T2S
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Settlement messages are not used for registration
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used for sending tax related information.
5. T2S schedule of settlement day		Not compliant	G	Straight-forward to implement	Testing readiness achieved	12/09/2016	Euroclear FR	Info source: SP2 and bilateral input from NUG. The ESX operational day will be considered the accounting day will be considered the start of day. The time period between T2S end of day and start of day.
	Market claims (28 standards)	43%		Major technical change	Not available	Not available	FR - MIG	NUG survey on T2S CA standards. The non-compliance affects some of the standards, in particular, following the migration to T2S, there is still no compliance date regarding the Euroclear France's segment transformations and buyer protection standards
	Transformations (13 standards)	33%		Major technical change				
Buyer protection (18 standards)	0%	R?	Other					
6. Corporate actions T2S CA standards (59)	8. Settlement Finality II: Irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2011 and 2012. SP2 and bilateral input from NUG already complies with T2S SP1 rule
	9. Settlement Finality III: Irrevocability of securities transfers.	Not compliant	G	CSD rules change	N/A	12/09/2016	Euroclear FR/Regulator	Info source: T2S HSG surveys 2011 and 2012. SP2 and bilateral input from NUG already complies with T2S SP1 rule forward to implement before migration to operating rules according to the T2S SP III rule. The barriers for the migration to French financial markets authority. No barriers are identified.
12. Settlement cycles	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT Outsourcing
	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGS survey and bilateral input. Full compliance since 6 October 2014. Input: all omnibus participants
CSD account structures	14. Restrictions on omnibus accounts	Not compliant	Y	Market practice change	Not available	Not available	Euroclear France	Info source: Based on the HSG decision on the migration to T2S, all omnibus participants to maintain two omnibus accounts based on type of securities held (securities, investor CSAs and their aggregation further down the custody chain).
	15. Securities account numbering	Not compliant	G	Straightforward to implement	Testing readiness achieved	12/09/2016	Euroclear FR	Info source: HSG survey on T2S securities account numbering. April, May 2013. French market plans for full compliance prior to migration to T2S.
Activity	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: List of cash and securities side DCAs as published by DCSP and further confirmation from the FR NUG
		Compliance with the relevant regulatory requirements/standards/rules	G	Type of Implementation gap	Implementation plan/dates provided, please provide the timetable and various milestones/dates in the implementation plan.	Ready for T2S testing	Implementation actor(s)	Further comments
<b>Priority 2</b>								
18. Corporate actions	CA market standards (68)	72%	G	Major technical change and legal changes	Not available	Not available	FR-MIG	Info source: BSG/EMIG Survey (September 2015 - final for migration to T2S) and Euroclear launch of Stream 6 - after migration to T2S.
	23. Securities amount standards (28)	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGS survey and bilateral input. Fully compliant with European market practice



T2S harmonisation activities: Greece (BOGS)									
Activity	Sub-activity	Compliance with the relevant standards/rules	Status <small>Green (G), Yellow (Y), Red (R), Blue (B)</small>	Type of implementation gap <small>If the standards/rules are not implemented, please specify what the type of gap is</small>	Implementation plan/date if standards/rules are not fulfilled - please provide the implementation plan.		Implementation actor(s) <small>Relevant national actors for implementation</small>	Further comments	
					Ready for T2S testing	Fully operational according to the T2S standard			
<b>Priority 1</b>									
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	22/06/2015	BOGS	Info source: Confirmation from the NUG received post-migration to T2S.	
	2. T2S mandatory matching fields	Fully compliant	B	N/A	N/A	22/06/2015	BOGS	Info source: Confirmation from the NUG received post-migration to T2S.	
	3. Interaction for registration	Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
5. T2S schedule of settlement day		Fully compliant	B	N/A	N/A	22/06/2015	BOGS/GR-NUG	Info source: Confirmation from the NUG received post-migration to T2S.	
	Market claims (28 standards) Transformations (13 standards)	100%		N/A				Info source: CASG gap analysis survey 2015. The Greek NUG is confirmed full compliance with all applicable T2S market claims and transformations and buyer protection standards on government debt securities it issues and serves.	
	Buyer protection (18 standards)	100%	B	N/A	N/A	N/A	BOGS for MCs and TRANS / GR-NUG for BP		
Legal harmonisation	8. Settlement Finality I: Irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
	9. Settlement Finality III: Irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	01/06/2015	BOGS	Info source: Confirmation from the NUG received post-migration to T2S.	
12. Settlement cycles	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
		Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
		Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
		Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	22/06/2015	BOGS	Info source: Confirmation from the NUG received post-migration to T2S.	
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	22/06/2015	GR NCB	Info source: Confirmation from the NUG received post-migration to T2S.	
Activity		Fully compliant	B	N/A	N/A	22/06/2015	Implementation actor(s)	Further comments	
		Indicates a level of compliance with the relevant standards/rules						Relevant national actors for implementation	
<b>Priority 2</b>									
18. Corporate actions	CA market standards (23)	100%	B	N/A	N/A	N/A	N/A	Info source: BSG/E-MIG Survey (Sep 2015). 23 (out of 23) standards already met.	
23. Securities amount static data		Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	



T2S harmonisation activities: Hungary									
Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date		Implementation actor(s)	Further comments	
					If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.	06/02/2017			
Priority 1									
T2S messages	1. T2S ISO 20022 messages	Not compliant	G	Straight-forward to implement	Testing readiness achieved	06/02/2017	KELER	Info source: SP2 and bilateral input. Full plan and implementation dates for full compliance prior to migration to T2S are provided	
	2. T2S mandatory matching fields	Not compliant	G	Straight-forward to implement	Testing readiness achieved	06/02/2017	KELER	Info source: SP2 and bilateral input. Full plan and implementation dates for full compliance prior to migration to T2S are provided	
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used for passing on registration information.	
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used for passing on tax-related information	
5. T2S schedule of settlement day		Not compliant	G	Major technical change	Testing readiness achieved	February 2017	KELER	Info source: SP2 and bilateral input and NUG Chairperson's response and NUG survey of 2014. The schedule will be amended, but there are no regulatory obstacles to adhering to the T2S settlement day schedule. No technical barriers identified for implementation. Detailed plan available to achieve full compliance before migration to T2S.	
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	4%		Regulatory/legislative/technical change				Info source: 2nd CASG gap analysis survey 2015. Consultations with tax authorities to clarify withholding tax regime are ongoing. Other proposals for legislative changes have been identified that could prevent their adoption in the legislation by the end of 2015. Detailed analysis and plan exist to comply with all standards from a technical perspective by 2016. Full implementation is planned for KELER's migration to T2S.	
	Transformations (13 standards)	8%		Market practice and legal change					
	Buyer protection (18 standards)	6%	G		Testing readiness achieved	06/02/2017	KELER, regulator, NUG		
Legal harmonisation	8. Settlement Finality I: Irrevocability and enforceability transfer order	Not compliant	G	CSD rules change	N/A	06/02/2017	KELER/regulator	Info source: T2S NUGs surveys 2011 and 2012. SP2 and bilateral input and NUG response. Plans and dates provided. However, no legislative changes are required. CSD rules change requires NCB approval. No barriers are foreseen in the procedure to incorporate these changes into the CSD rules.	
	9. Settlement Finality III: Irrevocability of securities transfers.	Not compliant	G	CSD rules change	N/A	06/02/2017	KELER/regulator	Info source: T2S NUGs surveys 2011 and 2012. SP2 and bilateral input and dates provided. However, no legislative changes are required. CSD rules change requires NCB approval. No barriers are foreseen in the procedure to incorporate these changes into the CSD rules.	
12. Settlement cycles	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.	
		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.	
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGs survey and bilateral input. No barriers identified.	
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGs survey and bilateral input. No barriers identified.	
T2S accounts numbering	15. Securities account numbering	Not compliant	G	Straight-forward to implement.	Testing readiness achieved	06/02/2017	Keller	Info source: HSG survey on T2S securities account numbering. April-May 2013. No barriers identified preventing full implementation of the standard. At the moment, the Hungarian NCB does not plan to open DCAs in T2S.	
	16. Dedicated cash account numbering	N/A	N/A	N/A	N/A	N/A	N/A		
Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date	Implementation actor(s)	Further comments		
Priority 2									
18. Corporate actions	CA market standards (68)	25%	R	Technical change and market practice for some standards	Testing readiness achieved	06/02/2017	KELER	Info source: BSG/E-MIG Survey (Sep 2015). 17 (out of 68) standards already met.	
	23. Securities amount static data	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGs survey and bilateral input. Full compliance with the EU standard.	





T2S harmonisation activities: Italy						
Activity	Sub-activity	Compliance with the standards/rules	Status	Type of implementation gap	Implementation priority/date	
					If standards/rules are not fulfilled, please provide the reasons for this	Further comments
Priority 1						
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	2. T2S mandatory matching fields	Fully compliant	B	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	Info source: T2S HSG surveys 2013. HSG surveys 2013 do not contain any registration information.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	Info source: T2S HSG surveys 2013. Bilateral input. Settlement messages do not contain any tax-related information. Info source: Confirmation from the NUG received post-migration to T2S.
5. T2S schedule of settlement day		Fully compliant	B	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	93%	R - Dec 2016	Market practice change	December 2016	Info source: 2nd CASO gap analysis survey 2015. Italian market has already migrated to T2S and all the T2S standards on CA processing are compliant with except transformations at standard 3 because of non-generation of market claims and respect to CA as well as market claim. Info source: Confirmation from the NUG received post-migration to T2S.
	Transformations (13 standards)	92%		Market practice change		
	Buyer protection (18 standards)	100%		Other		
Legal harmonisation	8. Settlement Finality II: Irrevocability and enforceability of transfer order	Fully compliant	B	N/A	N/A	Info source: T2S NUGs survey 2011 and 2012. SIF and bilateral input. Fully compliant with T2S SIF II rule
	9. Settlement Finality III: Irrevocability of securities transfers.	Fully compliant	B	N/A	June 2015	Info source: Confirmation from the NUG received post-migration to T2S.
12. Settlement cycles	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.
	11. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	Info source: Bilateral confirmation from NUGs. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	Info source: T2S NUGs survey and bilateral input. No barriers identified.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	Info source: T2S NUGs survey and bilateral input. No barriers identified.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	Info source: HSG survey on T2S PCA numbering. April. May 2013. All already complies fully with T2S standard.
Activity	Sub-activity	Compliance with the standards/rules	Status	Type of implementation gap	Implementation priority/date	Further comments
		Indicates level of compliance with the standards/rules. If the level is 'B' or 'R', the implementation gap is (see the dropdown list).	Green (G) is below (A) and (B). Yellow (Y) is (A) and (B).	If the standard/rule is not implemented, please specify what the type of gap is.	If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation priority/date. Fully operational according to the T2S standard.	Implementation actor(s) for registration
18. Corporate actions	CA market standards (68)	100%	B	N/A	N/A	Info source: RSG/IRMS Survey (Sep 2015). 68 (out of 68) standards already met.
	23. Securities amount static data	Fully compliant	B	N/A	N/A	Info source: T2S NUGs survey and bilateral input. Market complies fully with the EU standard.



T2S harmonisation activities: Lithuania							
Activity	Sub-activity	Compliance with the standards/rules	Status (Green (G), yellow (Y), red (R), Blue (B))	Type of implementation gap If the standards/rules are not yet implemented, please specify what the type of gap is	Implementation plan/date		Further comments
					If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan	Implementation actor(s)	
<b>Priority 1</b>							
T2S messages	1. T2S ISO 20022 messages	Not compliant	G	Straight forward to implement	Testing readiness achieved	18-Sep-17	LCVPD Info source: SP2 and bilateral input. New IT system for LCVPD. Plans and dates for full compliance before migration to T2S have been provided.
	2. T2S mandatory matching fields	Not compliant	G	Straight forward to implement	Testing readiness achieved	18-Sep-17	LCVPD Info source: SP2 and bilateral input. New IT system for LCVPD. Plans and dates for full compliance before migration to T2S have been provided.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A Info source: Bilateral confirmation from the issuer. Plans and dates for full compliance to transmit registration information
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A Info source: T2S HSG survey 2013. Settlement messages are not used to transmit tax-related information
5. T2S schedule of settlement day	Market claims (28 standards)	Not compliant	G	Technical adaptations and CSD rule change	26/09/2016	18-Sep-17	LCVPD Info source: SP2 and bilateral input and NUG survey. Plan and dates provided. No barriers identified.
	Transformations (13 standards)	0%		Regulatory/legislative change			
	Buyer protection (18 standards)	0%	G	Regulatory/legislative change	Testing readiness achieved	September 2017	LCVPD Info source: 2nd CASG gap analysis survey 2015. No obstacles have been identified to complying fully by migration date. According to the implementation plan, technical implementation will take place in October 2017. This will be followed by T2S testing. CSD rules changes will take effect as of migration date to T2S (2017).
6. Corporate actions T2S CA standards (59)	8. Settlement Finality I: Irrevocability and enforceability transfer order	Not compliant	G	CSD rules change	N/A	18-Sep-17	LCVPD Info source: T2S NUGS surveys 2011 and 2012. SP2 and bilateral input and NUG survey. New draft CSD rules have been provided for regulatory approval in the beginning of 2016. No legal/regulatory barriers identified.
	9. Settlement Finality III: Irrevocability of securities transfers.	Not compliant	G	CSD rules change	N/A	18-Sep-17	LCVPD Info source: T2S NUGS surveys 2011 and 2012. SP2 and bilateral input and NUG survey. New draft CSD rules have been provided for regulatory approval in the beginning of 2016. No legal/regulatory barriers identified.
Legal harmonisation	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A Info source: 2014 HSG survey on IT outsourcing.
	12. Settlement cycles	Fully compliant	B	N/A	N/A	N/A	N/A Info source: Bilateral confirmation from NUGS. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A Info source: T2S NUGS survey and bilateral input. No barriers identified.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A Info source: T2S NUGS survey and bilateral input. No barriers identified.
T2S accounts numbering	15. Securities account numbering	Not compliant	G	Straight forward to implement. No issues foreseen	Testing readiness achieved	18-Sep-17	LCVPD Info source: HSG survey on T2S securities account numbering. April-May 2013. T2S survey on T2S securities account numbering with the implementation of new CSD system. Plans and dates have been provided.
	16. Dedicated cash account numbering	Not compliant	G	Straight forward to implement	Testing readiness achieved	18-Sep-17	Bank of Lithuania No obstacle for T2S standard adoption. Info source: HSG survey on T2S DCA numbering. April-May 2013. Plan and dates have been provided. Progressing according to plan. No delays foreseen.
Activity	Sub-activity	Compliance with the standards/rules	Status (Green (G), yellow (Y), red (R))	Type of implementation gap If the standards/rules are not yet implemented, please specify what the type of gap is (use the dropdown list)	Implementation plan/date		Further comments
					If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan	Implementation actor(s)	
<b>Priority 2</b>							
18. Corporate actions	CA market standards (68)	31%	R	Legal barrier. Market practice change and changes in CSD rules and regulations	Testing readiness achieved	18-Sep-17	LCVPD Info source: BSG/ECMG survey (Sep 2015). 21 (out of 68) standards already met
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A Info source: T2S NUGS survey and bilateral input. Fully compliant with WU standard.



T2S harmonisation activities: LUX CSD									
Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date		Implementation actor(s)	Further comments	
					If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.	Fully operational according to the T2S standard			
<b>Priority 1</b>									
T2S messages	1. T2S ISO 20022 messages	Not compliant	G	Straight-forward to implement	Testing readiness achieved	06/02/2017	LUX CSD	Info sources: SP2 and bilateral input.	
	2. T2S mandatory matching fields	Not compliant	G	Straight-forward to implement	Testing readiness achieved	06/02/2017	LUX CSD	Info sources: SP2 and bilateral input. No issues with full compliance with T2S mandatory matching fields	
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info sources: T2S HSG surveys 2013. Registration information is not transferred via settlement messages	
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info sources: T2S HSG surveys 2013. Tax information is not transferred via settlement messages	
5. T2S schedule of settlement day		Not compliant	G	Straight-forward to implement	Testing readiness achieved	06/02/2017	LUX CSD	Info sources: SP2 and bilateral input. No issues foreseen in complying with T2S standards.	
	Market claims (28 standards)	54%		Straight-forward to implement				Info source: <b>2nd CASG gap analysis survey 2015.</b>	
	Transformations (13 standards)	0%		Straight-forward to implement				Compliance with more than half of the MC standards has been achieved. Where non-compliance has been identified, the reasons are clear. LUX CSD has confirmed that only a change in market practice would be necessary. The standards will be adopted, initially as a manual process, by September 2016, with the participation of Lux CSD in T2S.	
6. Corporate actions T2S CA standards (59)	Buyer protection (18 standards)	94%	G	Straight-forward to implement	Not available	06/02/2017	LUX CSD		
Legal harmonisation	8. Settlement Finality II: Irrevocability and enforceability transfer order	Not compliant	G	Regulatory/legislative change	N/A	06/02/2017	LUX CSD	Info sources: T2S NUGS survey 2011 and 2012, SP2 and bilateral input. Lux CSD will follow CBF instruction cancellation process.	
	9. Settlement Finality III: Irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Survey on T2S settlement finality rule III and NUG response. SFIII is ensured via provisions in public Luxembourg law	
	10. Outsourcing IT (Settlement ) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.	
	12. Settlement cycles	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.	
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGS survey and bilateral input.	
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGS survey and bilateral input.	
T2S accounts numbering	15. Securities account numbering	Not compliant	G	Straight-forward to implement	Testing readiness achieved	06/02/2017	LUX CSD	Info source: HSG survey on T2S securities account numbering. April-May 2013	
	16. Dedicated cash account numbering	Not compliant	G	Straight-forward to implement	Testing readiness achieved	March 2016	BCL	Info source: HSG survey on T2S securities account numbering. April-May 2013	
Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date		Implementation actor(s)	Further comments	
		Indicates level of compliance with the relevant standard/rules	Green (G), yellow (Y), red (R), Other (O)	If the standards/rules are not yet implemented, please specify what the type of gap is (int.)	If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.	Fully operational according to the T2S standard	Relevant national actors for implementation		
<b>Priority 2</b>									
18. Corporate actions	CA market standards (68)	Not available	R - No info	Other	Not available	Not available	LUX CSD	Info source: Information on LUX CSD compliance is not available in the September 2015 E-MIG survey	
	23. Securities amount static data	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGS survey and bilateral input.	



T2S harmonisation activities: VP LUX							
Activity	Sub-activity	Compliance with the relevant standards/rules	Status <small>Green (G), yellow (Y), red (R), blue (B)</small>	Type of implementation gap <small>If the standards/rules are not yet implemented, please specify what the type of gap is</small>	Implementation plan/date		Further comments
					If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the plan	Fully operational according to the T2S standard	
<b>Priority 1</b>							
T2S messages	1. T2S ISO 20022 messages	Not compliant	G	Straight-forward to implement	Testing readiness achieved	September 2016	VP Lux Info source: SP2 and bilateral input. VP is planning to use the T2S ISO 20022 standard for information management services in line with UDFS
	2. T2S mandatory matching fields	Not compliant	G	Major technical change	Testing readiness achieved	September 2016	VP Lux Info source: SP2 and bilateral input. Plans and dates for full compliance have been provided.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	VP Lux Info source: T2S HSG surveys 2013. Registration information is not part of the instruction and information about registration is taken directly from the accounts
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	VP Lux Info source: T2S HSG surveys 2013. Tax information is directly associated with the account, hence no need to transfer the details in settlement message
5. T2S schedule of settlement day		Not compliant	G	Major technical change	Testing readiness achieved	September 2016	VP Lux Info source: SP2 and bilateral input and NUG response. Plans and dates for full implementation have been provided. General concern about the End Of Day reporting and Start Of Day
6. Corporate actions T2S CA standards (59)	Market claims (26 standards)	21%					
	Transformations (13 standards)	15%	G	Market practice	Testing readiness achieved	September 2016	VP Lux Info source: 2nd CASG gap analysis survey 2015. VP LUX has committed to fully comply with the T2S CA standards prior to its migration to T2S (Sept 2016). As part of its plan, VP LUX will offer an automated CA detection service to its participants. The service will be ready for community testing in February 2016 prior to migration of VP LUX to T2S.
	Buyer protection (18 standards)	0%					
Legal harmonisation	8. Settlement Finality I: Irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	VP Lux Info source: T2S NUGS surveys 2011 and 2012. SP2 and bilateral input
	9. Settlement Finality III: Irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	VP Lux Info source: Survey on T2S settlement finality rule III and NUG response. SFIII is ensured via provisions in public Luxembourgish law
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	VP Lux Info source: 2014 HSG survey on IT outsourcing.
		Fully compliant	B	N/A	N/A	N/A	VP Lux Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	VP Lux Info source: T2S NUGS survey and Bilateral input.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	VP Lux Info source: T2S NUGS survey and Bilateral input.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	VP Lux Info source: HSG survey on T2S securities account numbering, April-May 2013. System changes are required.
T2S accounts numbering	15. Securities account numbering	Not compliant	G	System changes	Testing readiness achieved	September 2016	VP Lux Info source: HSG survey on T2S DCA numbering, April-May 2013. BCL to comply fully.
	16. Dedicated cash account numbering	Not compliant	G	Straightforward to implement	Testing readiness achieved	March 2016	VP Lux Info source: T2S NUGS survey and Bilateral input.
Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date	Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R)	If the standards/rules are not yet implemented, please specify what the type of gap is (use the dropdown list)	If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan. Fully operational according to the T2S standard	Relevant national actors for implementation	
<b>Priority 2</b>							
18. Corporate actions	CA market standards (68)	Not available	R - No info	Other	Not available	Not available	VP LUX Info source: Information on VP LUX compliance is not available in the September 2015 E-MIS survey
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	VP Lux Info source: T2S NUGS survey and bilateral input.



T2S harmonisation activities: Latvia						
Activity	Sub-activity	Compliance	Status	Type of implementation gap <small>If the standard/rules are not fully implemented, please specify what the type of gap is.</small>	Implementation plan/date <small>If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the various milestones/dates in the implementation plan.</small>	Further comments
T2S messages	1. T2S ISO 20022 messages	Not compliant	G	Straight-forward to implement	18-Sep-17	Source: Bilateral input and quarterly self assessment. Plans to comply fully by migration date.
	2. T2S mandatory matching fields	Not compliant	G	Market practice	18-Sep-17	Source: XMAP Survey 2015 and further bilateral clarification from the NUG on matching specifications according to T2S matching specifications.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	Source: Bilateral input. Registration information is not passed through settlement messages.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	Source: Bilateral input. Tax-related information is not passed through settlement messages.
5. T2S schedule of settlement day		Not compliant	G	Major technical change	26-Sep-16	Source: bilateral input and quarterly self assessment and NUG survey 2014. Technical adaptations and amendments in the schedule of settlement day are required. No barriers exist and complete plan is available.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	0%		Regulatory/legislative change		Info source: 2nd CASG gap analysis survey 2015. Full compliance with the standards is planned to be finalised at the time of migration to T2S in February 2017. No changes will be implemented by Q2 2016.
	Transformations (13 standards)	0%		Regulatory/legislative change		Discussion is ongoing with CSD participants on changes needed at the level of CSD participant-customer.
	Buyer protection (18 standards)	0%	Y	Market practice	18-Sep-17	Testing readiness achieved
Legal harmonisation	8. Settlement Finality II: Irrevocability and enforceability transfer order	Not compliant	G	Regulatory/legislative change	18-Sep-17	Source: bilateral input. Existing rules need to be updated and the same needs approval from the market as well as the CSD. No barriers to compliance have been identified.
	9. Settlement Finality III: Irrevocability of securities transfers.	Not compliant	G	Straight-forward to implement	18-Sep-17	Source: SPII survey and bilateral inputs. CSD rules amendment and regulatory approval will take place before migration to T2S. However, no barriers to compliance have been identified.
12. Settlement cycles	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.
	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	Source: Bilateral input. There are no restrictions rules regarding omnibus account in Latvian CSD.
	15. Securities account numbering	Fully compliant	B	N/A	N/A	Source: Bilateral input and quarterly self assessment. HSG survey on T2S DCA numbering. April-May 2013
T2S accounts numbering	16. Dedicated cash account numbering	Not compliant	G	Straight-forward to implement	18-Sep-17	Testing readiness achieved
	Sub-activity	Not compliant	G	Straight-forward to implement	18-Sep-17	Testing readiness achieved
Activity		Compliance	Status	Type of implementation gap <small>If the standards/rules are not implemented, please specify what the type of gap is.</small>	Implementation plan/date <small>If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.</small>	Further comments
Priority 1						
18. Corporate actions	CA market standards (68)	82%	G	Major technical change	18-Sep-17	Info source: BSC/E-MIG Survey (September 2014). Some of the standards will require CSD rule changes for implementation.
	23. Securities amount static data	Not compliant	G	Straight-forward to implement	18-Sep-17	Source: Bilateral input and quarterly self assessment.
Priority 2						



T2S harmonisation activities: Malta						
Activity	Sub-activity	Compliance with the relevant standards/rules	Status <small>Green (G), yellow (Y), red (R), blue (B)</small>	Type of implementation gap		Further comments
				If standards/rules are not fulfilled, please provide the implementation plan/date	Implementation actor(s)	
Priority 1						
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	2. T2S mandatory matching fields	Fully compliant	B	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
5. T2S schedule of settlement day		Fully compliant	B	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	100%	B	N/A	N/A	Info source: 2nd CASG gap analysis survey 2015 and further confirmation from the NUG regarding full implementation of T2S standards for Malta. All the standards with regards to market claims and transformation were already implemented when the Maltese CSD migrated to T2S. Chapter 7 of the MSE by-law includes provisions to include the buyer protection provisions.
	Transformations (13 standards)	100%	B	N/A	N/A	
Legal harmonisation	8. Settlement Finality I: Irrevocability and enforceability transfer order	Fully compliant	B	N/A	NA	Info source: Confirmation from the NUG received post-migration to T2S.
	9. Settlement Finality III: Irrevocability of securities transfers.	Fully compliant	B	N/A	NA	Info source: Confirmation from the NUG received post-migration to T2S.
12. Settlement cycles	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
		Fully compliant	B	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
Activity		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R)	Type of implementation gap	Implementation plan/date if standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.	Implementation actor(s)
					Ready for T2S testing	Relevant national actors for implementation
Priority 2						
18. Corporate actions CA market standards (68)		82%	G	Other	Testing readiness achieved	Info source: BSG/E-MIG Survey (Sep 2015). 56 (out of 68) standards already met
23. Securities amount static data		Fully compliant	B	N/A	N/A	Info source: T2S NUGs survey and bilateral impact.



T2S harmonisation activities: the Netherlands							
Activity	Sub-activity	Compliance	Status	Type of implementation gap <small>If the standards/rules are not yet implemented, please specify what the type of gap is.</small>	Implementation plan/date if standards/rules are not fulfilled, please provide the timetable and various implementation plan.		Further comments
					Testing readiness achieved	Implementation actor(s)	
<b>Priority 1</b>							
T2S messages	1. T2S ISO 20022 messages	Not compliant	G	Straight-forward to implement	Testing readiness achieved	12/09/2016	Euroclear NL <small>Relevant national actors for implementation</small>
	2. T2S mandatory matching fields	Not compliant	G	Straight-forward to implement	Testing readiness achieved	12/09/2016	Euroclear NL
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A
5. T2S schedule of settlement day		Not compliant	G	Straight-forward to implement	Testing readiness achieved	12/09/2016	Euroclear NL
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	43%	R	Major technical change	Not available	Not available	NL-MIG
	Transformations (13 standards)	23%	R	Major technical change	Not available	Not available	
	Buyer protection (18 standards)	0%	R	Other	Not available	Not available	
Legal harmonisation	8. Settlement Finality II: Irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A
	9. Settlement Finality III: Irrevocability of securities transfers.	Not compliant	G	Straight-forward to implement	N/A	12/09/2016	Euroclear NL
12. Settlement cycles	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A
		Fully compliant	B	N/A	N/A	N/A	N/A
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A
T2S accounts numbering	15. Securities account numbering	Not compliant	G	Straightforward to implement	Testing readiness achieved	12/09/2016	Euroclear NL
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A
Activity	Sub-activity	Compliance	Status	Type of implementation gap <small>If the standards/rules are not yet implemented, please specify what the type of gap is (use the dropdown list).</small>	Implementation plan/date if standards/rules are not fulfilled, please provide the timetable and various implementation plan.	Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant account numbering standards/rules	Green (G), Yellow (Y), and Red (R)		Ready for T2S testing	Relevant national actors for implementation	
<b>Priority 2</b>							
18. Corporate actions	CA market standards (68)	75%	G	Major technical change and market practice change	Not available	Not available	Euroclear
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A



T2S harmonisation activities: Portugal (Interbolsa)								
Activity	Sub-activity	Compliance with the relevant standards/rules	Status <small>Green (G), Yellow (Y), Red (R), Blue (B)</small>	Type of implementation gap <small>If the standards/rules are not yet implemented, please specify what type of gap is</small>	Implementation plan/date		Implementation actor(s) <small>Relevant national actors for implementation</small>	Further comments
					If standards/rules are not fulfilled, please provide the timetable and various fully operational according to the T2S standard	Ready for T2S testing		
T2S messages	1. T2S ISO 20022 messages	Not compliant	G	Straight-forward to implement	Testing readiness achieved	28 March 2016	Interbolsa	Info source: SP2 and bilateral input and quarterly status gathering templates.
	2. T2S mandatory matching fields	Not compliant	G	Straight-forward to implement	Testing readiness achieved	28 March 2016	Interbolsa	Info source: SP2 and bilateral input and quarterly status gathering templates.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. No registration details are sent via settlement instructions
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013 and settlement instructions. Information is not passed on while sending settlement instructions
5. T2S schedule of settlement day		Not compliant	G	Straight-forward to implement	Testing readiness achieved	28 March 2016	Interbolsa	Info source: SP2 and bilateral input and T2S NUG survey. Adaptations are ongoing to migration to T2S. No barriers identified. However, there is concern regarding the short amount of time between the EOD and the start of the business and send to T2S the corporate actions
6. Corporate actions T2S CA standards (59)	Market claims (28 standards) Transformations (18 standards)	75% 94%		Technical change Other				
	Buyer protection (18 standards)	0%	R - Sep 2016	Manual BP to be implemented	Testing readiness achieved	04 September 2016	Interbolsa	Info source: 2nd CASG gap analysis survey 2015 and information from NUG. Full compliance with standards will be achieved by the end of interbolsa to T2S by September 2016.
Legal harmonisation	8. Settlement Finality II: Irrevocability and enforceability transfer order	Not compliant	G	Operational and technical change/ CSD rules change	N/A	28 March 2016	Interbolsa/National Regulator	Info source: NUG response (Oct 2014). Technical change and CSD rule change. Preparation for T2S: October 2015 for testing. Full compliance is planned by March 2016 (on the date of interbolsa's migration).
	9. Settlement Finality III: Irrevocability of securities transfers.	Not compliant	G	CSD rules change	N/A	28 March 2016	Interbolsa/National Regulator	Info source: Comments on 3rd progress report (2013). CSD rules will be amended. No legal/regulatory change or approval is needed.
12. Settlement cycles	10. Outsourcing IT (Settlement ) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.
		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. Omnibus accounts are available
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG discussions (Feb 2015). There are no restrictions on the omnibus accounts that need to be propagated down the settlement chain
T2S accounts numbering	15. Securities account numbering	Not compliant	G	Straight-forward to implement	Testing readiness achieved	28 March 2016	Interbolsa	Info source: HSG survey on T2S securities account numbering. April/May 2013 implementation will coincide with system adaptation to T2S survey on T2S DCA numbering. April/May 2013
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Further comments
Activity		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R)	Type of implementation gap <small>If the standards/rules are not yet implemented, please specify what type of gap is (use the dropdown list)</small>	If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s) <small>Relevant national actors for implementation</small>	
					Ready for T2S testing	Fully operational according to the T2S standard		
18. Corporate actions	CA market standards (68)	91%	G	Market practice change and Technical change	Testing readiness achieved	Not available	Interbolsa	Info source: BSCG/E-MIG Survey (Sep 2015). 62 (out of 68) standards already met
	23. Securities amount static data	Not compliant	G	Major technical change	Testing readiness achieved	28 March 2016	Interbolsa	Info source: T2S NUGS survey, bilateral input and comments on 3rd progress report (Jan 2013). Plan to change to EU market practice prior to testing phase





T2S harmonisation activities: Romania									
Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date		Implementation actor(s)	Further comments	
					If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.	Implementation plan/date			
Priority 1									
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	22/06/2015	DC	Info source: Confirmation from the NUG received post-migration to T2S.	
	2. T2S mandatory matching fields	Fully compliant	B	N/A	N/A	22/06/2015	DC	Info source: Confirmation from the NUG received post-migration to T2S.	
	3. Interaction for registration	Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
5. T2S schedule of settlement day	Market claims (28 standards) Transformations (13 standards)	Fully compliant	B	N/A	N/A	22/06/2015	CSD/NCB	Info source: Confirmation from the NUG received post-migration to T2S.	
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	0%	R - Feb 2017	Market Practice	31 October 2016	February 2017	CSD, Regulator, NCB	Info source: 2nd CASG gap analysis survey 2015. The Romanian market was not compliant with the T2S CA standards by its migration to T2S. In October 2014 the RO T2S NUG provided an implementation plan for achieving full compliance by February 2017. The plan included detailed phases for technical and regulatory changes. However, the Romanian market's implementation of these measures has lagged behind the detailed plan, although it caught up somewhat with the plan in September 2015, when the necessary legislative changes were approved by the Romanian Financial Supervisory Authority. The implementation of the remaining standards is expected to be completed by the end of October 2015 which aims to achieve full compliance by the same deadline: February 2017.	
	Buyer protection (18 standards)	0%	Technical						
Legal harmonisation	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	22/06/2015	CSD	Info source: Confirmation from the NUG received post-migration to T2S.	
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
	12. Settlement cycles	Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	22/06/2015	N/A	Info source: Confirmation from the NUG received post-migration to T2S.	
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	22/06/2015	CSD	Info source: Confirmation from the NUG received post-migration to T2S.	
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	22/06/2015	Banca Natională a României	Info source: Confirmation from the NUG received post-migration to T2S.	
Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date		Implementation actor(s)	Further comments	
					If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.	Implementation plan/date			
Priority 2									
18. Corporate actions	CA market standards (68)	60%	Y	Market practice as well as regulatory changes	31 October 2016	01/02/2017	CSD, Regulator, NCB	Info source: BSC/E-MIG Survey (Sep 2015). 41 (out of 68) standards already met	
					N/A	N/A	N/A	Info source: T2S NUGs survey and bilateral input. No issues with securities amount data in Romania.	
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A		



T2S harmonisation activities: Slovenia									
Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date		Implementation actor(s)	Further comments	
					If standards/rules are not fulfilled, provide the timetable and various milestones/dates in the implementation plan.	Implementation plan/date			
Priority 1									
T2S messages	1. T2S ISO 20022 messages	Not compliant	G	Technical	Testing readiness achieved	February 2017	KDD	Info source: SP2 and Bilateral Input. KDD will also implement T2S ISO 20022 communication with T2S, i.e. for processes not done via T2S GUI. Standards are implemented and in use in test environment. H5G surveys 2013. Settlement messages are not used for transmission of registration information. Info source: T2S H5G surveys 2013. Settlement messages are not used for transmission of registration information. Info source: SP2 and Bilateral Input and 2014 NUG survey. KDD will implement the T2S settlement messages according to the needs of its users. No barriers identified	
	2. T2S mandatory matching fields	Not compliant	G	Market practice	Testing readiness achieved	February 2017	KDD	Info source: T2S H5G surveys 2013. Settlement messages are not used for transmission of registration information. Info source: SP2 and Bilateral Input and 2014 NUG survey. KDD will implement the T2S settlement messages according to the needs of its users. No barriers identified	
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S H5G surveys 2013. Settlement messages are not used for transmission of registration information. Info source: SP2 and Bilateral Input and 2014 NUG survey. KDD will implement the T2S settlement messages according to the needs of its users. No barriers identified	
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S H5G surveys 2013. Settlement messages are not used for transmission of registration information. Info source: SP2 and Bilateral Input and 2014 NUG survey. KDD will implement the T2S settlement messages according to the needs of its users. No barriers identified	
5. T2S schedule of settlement day	Market claims (28 standards)	Not compliant	G	Technical	Testing readiness achieved	February 2017	KDD	Info source: T2S H5G surveys 2013. Settlement messages are not used for transmission of registration information. Info source: SP2 and Bilateral Input and 2014 NUG survey. KDD will implement the T2S settlement messages according to the needs of its users. No barriers identified	
	Corporate actions T2S CA standards (59)	0%	G	Regulatory/legislative/technical change	Testing readiness achieved	February 2017	KDD/national legislators and regulators	Info source: 2nd CASG gap analysis survey 2015. The Slovenian T2S NUG plans to fully implement the standards by its migration to T2S in February 2017. Major legal reform was voted into law in October 2015	
	Buyer protection (18 standards)	0%	G	Other	Testing readiness achieved	February 2017	KDD/national legislators and regulators	Info source: T2S NUGS surveys 2011 and 2012. SP2, status gathering templates Q2 2013 and bilateral input. KDD is still possible but KDD will comply fully with SF II rule prior to migration to T2S. Regulations to accommodate SFII requirements. No obstacles to regulatory change are identified.	
Legal harmonisation	8. Settlement Finality II: Irrevocability and enforceability transfer order	Not compliant	G	Regulatory change	N/A	February 2017	KDD	Info source: T2S NUGS surveys 2011 and 2012. SP2, status gathering templates Q2 2013 and bilateral input. KDD is still possible but KDD will comply fully with SF II rule prior to migration to T2S. Regulations to accommodate SFII requirements. No obstacles to regulatory change are identified.	
	9. Settlement Finality III: Irrevocability of securities transfers.	Not compliant	G	Legislative change and regulatory endorsement	N/A	February 2017	KDD/national legislators and regulators	Info source: T2S NUGS surveys 2011 and 2012. SP2, status gathering templates Q2 2013 and bilateral input. KDD is still possible but KDD will comply fully with SF II rule prior to migration to T2S. Regulations to accommodate SFII requirements. No obstacles to regulatory change are identified.	
12. Settlement cycles	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S H5G survey on IT outsourcing. Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.	
	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGS survey and bilateral input. No issues.	
CSD account structures	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGS survey and bilateral input. No issues.	
	15. Securities account numbering	Not compliant	G	Straight-forward to implement	Testing readiness achieved	February 2017	KDD	Info source: H5G survey on T2S securities account numbering. April-May 2013. Q2 2013 status gathering template	
T2S accounts numbering	16. Dedicated cash account numbering	Not compliant	G	Straight-forward to implement	Testing readiness achieved	February 2017	SI NCB	Info source: H5G survey on T2S DCA. Roadmap for implementation is available	
	Activity	Compliance	Status	Type of implementation gap	Implementation plan/date	Implementation actor(s)	Further comments		
Priority 2									
18. Corporate actions	CA market standards (68)	22%	R	Major technical change and legislative change	4Q 2016	February 2017	KDD/national legislators and regulators	Info source: B5G/E-MIS Survey (Sep 2015). 15 (out of 68) standards already met	
	23. Securities amount static data	Not compliant	G	Straight-forward to implement	Testing readiness achieved	February 2017	KDD	Info source: Q2 2013 status gathering template	





## Annex 5: List of members of the T2S Advisory Group

The T2S Advisory Group (AG) provides advice to the Eurosystem on T2S-related issues to ensure that T2S is developed and implemented according to market needs. To this end, the AG is made up of representatives from all stakeholders, i.e. participating CSDs, banks and national central banks. In particular, the AG addresses T2S issues related to policy, pricing, governance and harmonisation in the field of securities settlement.

As far as harmonisation matters are concerned, the AG is supported by the HSG.

The AG's mandate is available on the T2S website. The group's meeting documents can also be downloaded from the website. The list of members is below.

Institution	Name
<b>Chair and Secretariat</b>	
European Central Bank	Marc Bayle (Chairperson)
European Central Bank	Meike Ströter (Secretary)
<b>User members</b>	
Banco Santander	Amadeo Lázaro Fernández
Bank of America Merrill Lynch	John Whelan
BBVA	Fernando García Rojo
BNP Paribas	Alain Pochet
BNY Mellon	James Cunningham
CACEIS	Eric Derobert
CECA	José-Luis Rebollo Palomero
Citi	Richard Scavetta
Commerzbank	Roland Kipper
Danske Bank Plc	Tom S. Jensen
Danske Bank Plc	Päivi Nyrhilä
Deutsche Bank	Stephen Lomas
Deutsche Wertpapier Service Bank	Mark Hoßdorf
Eurex Clearing	Kay Schäfer
EuroCCP	Albert-Jan Huizing
Goldman Sachs	Isabelle Hennebelle
ICBPI	Paolo Callegaro
ING	Antoine Vonk
Intesa Sanpaolo	Mario-Domenico Recchia
JP Morgan	Diana Dijmarescu
Nordea	Marianne Sørensen
Société Générale	Eric de Gay de Nexon
Swedbank AS	Elo Tempel
UBS	Florentin Soliva
Unicredit Bank Austria AG	Guenther Schnaitt



<b>CSDs</b>	
AS Eesti Väärtpaberikeskus (Estonia)	Kristi Sisa
Bank of Greece Securities Settlement System (BOGS)	Vicky Dellopoulou
Centrálny depozitár cenných papierov SR, a. s. (Slovakia)	Dagmar Kopuncová
Clearstream Banking AG (Germany)	Mathias Papenfuß Guido Wille Karla Amend
Depozitarul Central S.A. (Romania)	Silvia Buicanescu
Euroclear Belgium	Michael Shipton
Euroclear Finland Oy	Hanna Vainio
Euroclear France	Brigitte Daurelle
Euroclear Nederland	Philip Van Hassel
Iberclear – BME Group (Spain)	Jesús Benito
Interbolsa (Portugal)	Rui de Matos
KDD - Centralna klirinško depotna družba, d.d. (Slovenia)	Davor Pavic
Központi Elszámolóház és Értéktár Zrt. – KELER (Hungary)	György Dudás
Latvijas Centralais depozitārijs (Latvia)	Indars Aščuks
Lietuvos centrinis vertybinių popierių depozitoriumas (Lithuania)	Mindaugas Bakas
LuxCSD S.A. (Luxembourg)	Patrick Georg
Malta Stock Exchange	Eileen Muscat
Monte Titoli S.p.A. (Italy)	Mauro Dognini Paolo Carabelli
National Bank of Belgium Securities Settlement System (NBB-SSS)	Marc Lejoly
NCDPCP - Národný centrálny depozitár cenných papierov, a. s. (Slovakia)	Zuzana Libičová Andrej Sinicyn
Österreichische Kontrollbank Aktiengesellschaft (Austria)	Georg Zinner
SIX SIS Ltd. (Switzerland)	Urs Wieland
VP LUX S.á.r.l. (Luxembourg)	Birger Schmidt
VP Securities A/S (Denmark)	Niels Olsen
<b>Central banks (Eurosystem)</b>	
European Central Bank	Sylvain Debeaumont
Nationale Bank van België / Banque Nationale de Belgique	Yvan Timmermans
Deutsche Bundesbank	Katharina Tobiasch
Eesti Pank	Mihkel Nõmmela
Central Bank of Ireland	John Geelon
Bank of Greece	Vicky Dellopoulou
Banco de España	Jesus Lopez Pedruelo
Banque de France	Emanuelle Assouan
Banca d'Italia	Fabrizio Palmisani
Central Bank of Cyprus	George Nicolaou
Latvijas Banka	Egons Gailitis



<b>Central banks (Eurosystem)</b>	
Lietuvos bankas	Dainius Grikinis
Banque centrale du Luxembourg	Pierre Thissen
Central Bank of Malta	Sylvana Gatt
De Nederlandsche Bank	Annemarie Hondius
Österreichische Nationalbank	Hannes Hermanky
Banco de Portugal	Fernando Chau
Banka Slovenije	Simon Anko
Národná banka Slovenska	Peter Holicka
Suomen Pankki	Kirsi Ripatti
<b>Central Banks (non-Eurosystem)</b>	
Danmarks Nationalbank	Peter Restelli-Nielsen
<b>Observers</b>	
T2S Board	Pierre Beck Ron Berndsen Maria Tereza Cavaco Yvon Lucas Cristina Mastropasqua Jochen Metzger Michalis Michalopoulos Michael Power Luis Miguel Rodriguez Caramelo Karsten Biltoft Johannes Luef Joël Mérére
European Association of Co-operative Banks	Ilektra Zazoura
Association for Financial Markets in Europe	Stephen Burton
European Association of Clearing Houses	Christoph Hemon
European Banking Federation	Daniele De Gennaro
European Savings Bank Group	Norbert Bielefeld
Federation of European Securities Exchanges	Rainer Riess
European Securities and Markets Authority	Alina Dragomir
European Commission	Agata Malczewska
Eurosystem oversight function	Fiona van Echelpoel
4CB	Siegfried Vonderau Lorenzo Giammò María Teresa Arraez Philippe Leblanc



[www.harmonisation.t2s.eu](http://www.harmonisation.t2s.eu)