



EUROPEAN CENTRAL BANK

EUROSYSTEM

SCoRE Adaptation Plans Status Report

Advisory Group on Market Infrastructures for
Securities and Collateral

Single Collateral Management
Rulebook for Europe

Status as at June 2020

July 2020



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Executive summary

Background

The Single Collateral Management Rulebook for Europe (SCoRE) is an initiative of the Advisory Group on Market Infrastructures for Securities and Collateral (AMI-SeCo) to define common rules for managing collateral. The SCoRE initiative began in December 2017 with the identification of ten activities for which further harmonisation is needed in order to improve the efficiency of collateral management in Europe¹. Each of these ten activities has been analysed / is being analysed by a dedicated AMI-SeCo collateral management harmonisation task force (CMH-TF) with a view to defining harmonisation standards (AMI-SeCo Standards).

In May, July and August 2019 AMI-SeCo endorsed the first set of AMI-SeCo Standards relating to three of the ten activities, namely Triparty Collateral Management, Corporate Actions and Billing Processes. The AMI-SeCo Standards for Corporate Actions currently focus on CA events relevant to debt instruments² and cover CA processing through the custody chain. Endorsement of the Standards represents the first step in the AMI-SeCo monitoring process. Once the Standards have been defined, focus shifts to the preparation of Adaptation Plans (step 2) in each market prior to the start of the implementation monitoring (step 3), in line with the [Monitoring Framework](#) also agreed by AMI-SeCo.

AMI-SeCo agreed that Adaptation Plans should be developed by Central Securities Depositories (CSDs) and Triparty Agents (TPAs) in order to demonstrate a clear roadmap for achieving compliance with the AMI-SeCo Standards. There should be separate plans for triparty collateral management, corporate actions, billing processes and remaining AMI-SeCo Standards. Each plan should follow a pre-defined template (see Annex 1). These Plans should form the basis for other implementing actors to prepare for their adjustments (i.e. as defined in the Standards: Eurosystem central banks, Eurosystem counterparties, custodians, CCPs and issuers/issuer agents). The Adaptation Plans should be endorsed by the National Stakeholder Groups (NSGs).

Status overview

Adaptation Plans have been provided by the majority of AMI-SeCo markets, each of which have expressed strong support and commitment to implementing the AMI-SeCo Standards. A summary of the status is provided in the map below (see Figure 1).

¹ Please refer to the [Collateral Management Harmonisation](#) report for further information.

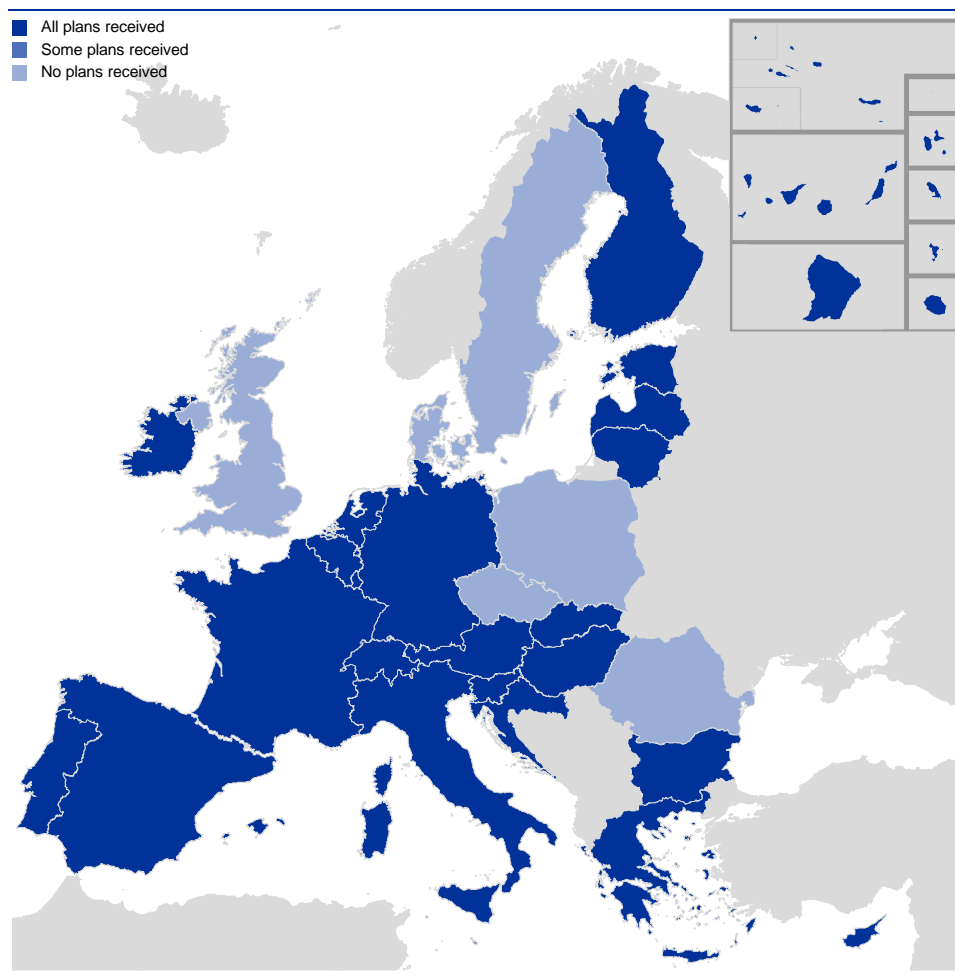
² Work on extending the applicability of the Standards to other instrument types is currently ongoing in the CMH-TF's Asset Servicing Expert Group.

In total, implementing actors were asked to prepare 100 Adaptation Plans. In the NSGs in the European Union, United Kingdom and Switzerland, TPAs and CSDs provided Adaptation Plans for the relevant sets of AMI-SeCo Standards. This resulted in a request to prepare:

- 8 Adaptation Plans for Triparty Collateral Management (from 8 TPAs)
 - 46 Adaptation Plans for Corporate Actions (from 38 CSDs and 8 TPAs)
 - 46 Adaptation Plans for Billing Processes (from 38 CSDs and 8 TPAs)
- = 100 Adaptation Plans

The NSGs involved other relevant stakeholders in discussions on the related work, before submitting the Adaptation Plans to the CMH-TF Secretariat.

Figure 1
Adaptation plan status for each AMI-SeCo market



As shown above, Adaptation Plans have been provided by the majority of AMI-SeCo markets each of which have expressed strong support and commitment to the implementation of the AMI-SeCo Standards. In a smaller

number of cases either (i) no plans were prepared or (ii) additional time was requested to prepare the Adaptation Plans as summarised below.

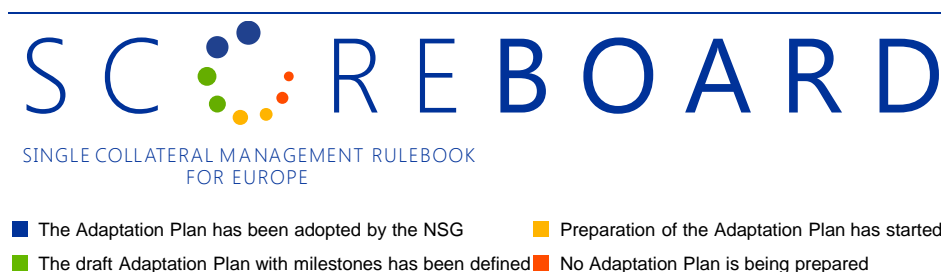
The following NSGs have not yet provided Adaptation Plans for some or all entities and are encouraged to do so:

- **Czech Republic** – No Adaptation Plan has been provided.
- **Denmark** – No Adaptation Plan has been provided.
- **Malta** – The Adaptation Plan on Billing Processes has not yet been provided by the Malta Stock Exchange (the Adaptation Plan for Corporate Actions has been submitted).
- **Poland** – Both of the CSDs operating in the Polish market (KDPW and SKARBNET4) are currently in the process of preparing Adaptation Plans.
- **Romania** – No Adaptation Plan has been provided but a commitment to provide the Adaptation Plans has been made.
- **Sweden** – No Adaptation Plan has been provided.
- **United Kingdom** – No Adaptation Plan has been provided.

SCoREBOARD for Adaptation Plans

Each plan is assigned a colour-code status, to indicate whether the plan is complete and has been adopted by market participants. In accordance with the methodology defined by AMI-SeCo for the Planning Phase (see the SCoREBOARD in Figure 2 below), a colour code is assigned. The colour-coding assessment was reviewed by the NSGs and the CMH-TF prior to being submitted to the AMI-SeCo for approval.

Figure 2
SCoREBOARD – Planning Phase



Notes: Should a major review of the Adaptation Plan be needed, the colour codes will apply to the preparation and adoption of the new (updated) plan.

AMI-SeCo is invited to take action in respect of those entities that have not made a commitment as regards Adaptation Plans. All entities are invited to provide an update on their planning by 11 September 2020 if they have not prepared an Adaptation Plan (assigned Red in the SCoREBOARD) or have started to prepare an

Adaptation Plan but where no milestones have been established (assigned Yellow in the SCoREBOARD). The overview of entities with Red and Yellow are listed in Chapter 1. Other entities with Plans that have been assigned Green and Blue are also invited to update their Plans if / where necessary. Further outreach / education on the Standards should also take place within the NSGs.

The report is structured as follows:

- **Section 1** provides an overview of the actors required to provide an Adaptation Plan for each activity (e.g. Triparty Collateral Management) and for each market (e.g. Germany). A status overview is provided for each plan received.
- **Section 2** summarises the key findings of the feasibility assessment conducted by each reporting entity as part of the Adaptation Plans and identifies relevant action points.
- **Section 3** focuses on the implementation milestones.
- **Section 4** introduces the next phase of the work – the implementation phase.
- **Annex 1** provides an example of the Adaptation Plan template.

1 Overview of Adaptation Plans

Background

Adaptation Plans were requested from key financial market stakeholders active in the European Union, the United Kingdom and Switzerland (referred to as “AMI-SeCo markets”). In particular, Adaptation Plans were requested from two key stakeholders, i.e. (i) TPAs for the AMI-SeCo Standards relating to Triparty Collateral Management, Corporate Actions and Billing Processes and (ii) international CSDs or (I)CSDs for the AMI-SeCo Standards for Billing Processes and Corporate Actions. The market participants in the NSGs then reviewed the draft Adaptation Plans and endorsed them.

Table 1
Key stakeholders

(to prepare draft Adaptation Plans)

	AMI-SeCo Standards Triparty Collateral Management	AMI-SeCo Standards Corporate Actions	AMI-SeCo Standards Billing Processes
To provide Adaptation Plans (for relevant Standards)			
TPAs	√	√	√
(I)CSDs		√	√

This section provides an overview of the Adaptation Plans received by TPAs and (I)CSDs.

- **All TPAs have prepared Adaptation Plans for implementing the AMI-SeCo Standards for Triparty Collateral Management.** In these Plans, TPAs explained their intended adaptations for each of the individual Standards. TPAs were also asked to provide separate Plans to explain the adaptations required for Corporate Actions and Billing Processes.
- **All CSDs in the euro area have prepared Adaptation Plans for implementing the AMI-SeCo Standards for Corporate Actions.** CSDs outside the euro area have begun their preparations and several plans have been received (i.e. the CSDs in Bulgaria, Croatia, Hungary and Switzerland have prepared Adaptation Plans). Other CSDs are expected to provide a Plan during the second half of 2020.
- **All but one CSD in the euro area have prepared an Adaptation Plan for implementing the AMI-SeCo Standards for Billing Processes.** In the case of Malta Stock Exchange, an Adaptation Plan remains outstanding. CSDs outside the euro area have begun their preparations (same status as for Corporate Actions).

Sections 1.1 to 1.3 provide an overview of the Adaptation Plans received for each activity. They also provide an assessment to assign a colour-code status in

accordance with the methodology defined by AMI-SeCo. Further details of the individual plans can be found by clicking on the entity name in each of the tables below.

1.1 Triparty Collateral Management

Key takeaways

1. All TPAs support the implementation of the Standards (Single Triparty Model).
2. Most TPAs have confirmed that the implementation deadline of November 2022 will be met. Two TPAs will implement the ISO 20022 messaging standard after internal reorganisation (Euroclear Bank and Euroclear France). One TPA has indicated that further confirmation is needed for its internal reorganisation (SIX SIS).

Table 2

Status overview: TPAs

NSG	Entity	Status	Notes
BE	BNY Mellon	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides strong support for the Single Triparty Model. The Plan explains the changes required and contains all the milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline (subject to further assessments from the detailed impact analysis).
BE	Euroclear Bank	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan provides strong support for the Single Triparty Model. The Plan explains the changes required, but does not contain the planning for all the Standards. The planning for implementing ISO 20022 messaging standards is expected after its planning on migration to T2S for Central Bank Money settlement in EUR. No critical barriers identified so far. The Plan does not confirm that all the Standards will be implemented by the November 2022 deadline. By November 2022, the exchange of reference data through straight-through processing and business progresses will be implemented. Two remaining Standards will be implemented with migration to T2S (i.e. messaging and reporting on flows).
CH	SIX SIS	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan provides strong support for the Single Triparty Model. The Plan explains the changes required, but does not contain all the milestones. The planning is proposed but not yet confirmed to connect to the T2S System directly as DCM for all Triparty Services. No critical barriers identified so far. The Plan does not confirm that the Standards will be implemented by the November 2022 deadline. The Standards will be implemented when the TPA connects to T2S (subject to further confirmation).
DE	Clearstream Banking Frankfurt	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides strong support for the Single Triparty Model. The Plan clearly explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline (subject to further assessments from the detailed impact analysis).
FR	BNP Paribas	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides strong support for the Single Triparty Collateral Management Rulebook for Europe. The Plan explains the changes required and contains milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline (subject to further assessments from the detailed impact analysis).

FR	Euroclear France	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan provides strong support for the Single Triparty Model. The Plan clearly explains the changes required but does not contain all the milestones. The Plan explains that Euroclear France will first make adaptations to the Floating Collateral Management service and the TPA will then implement the Single Triparty Model. No critical barriers identified so far. The Plan does not confirm that the Standards will be implemented by the November 2022 deadline.
LU	Clearstream Banking Luxembourg	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides strong support for the Single Triparty Model. The Plan clearly explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline (subject to further assessments resulting from the detailed impact analysis).
LU	JP Morgan	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides strong support for the Single Triparty Model. The Plan clearly explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the implementation deadline of November 2022 will be met.

Notes: The Adaptation Plans should be updated where necessary.

1.2 Corporate Actions

Key takeaways

1. Euro area CSDs support the implementation of the AMI-SeCo Standards for Corporate Actions. One CSD (NBB SSS) has planned to implement a number of corporate action events / functionalities by November 2025 (i.e. CA functionalities which are currently not available).
2. Many CSDs outside the euro area support the implementation of the AMI-SeCo Standards for Corporate Actions. The plan produced by the CSD for Hungary (KELER) is the most advanced, while other plans have made significant progress as regards the impact assessment.
3. No Plans have been received from the CSDs in the Czech Republic, Denmark, Poland, Romania, Sweden and the United Kingdom. NSGs or industry fora are being set up or re-activated in these markets in order to implement the Standards. The CSD in the United Kingdom is the least advanced from a planning point of view; the NSG in that country would have to be re-established as a first step to start the process.
4. For TPAs, confirmation is required that the information on Corporate Actions Standards in the Adaptation Plan provided by a CSD also applies when the same entity acts as a TPA.

Table 3

Status overview: (I)CSDs

NSG	Entity	Status	Explanation
AT	Oesterreichische Kontrollbank Aktiengesellschaft (Austria)	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the implementation deadline of November 2022 will be met.
BE	Euroclear Belgium	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the implementation deadline of November 2022 will be met.
BE	National Bank of Belgium Securities Settlement System (NBB-SSS)	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. In some cases, the Plan confirms that the implementation deadline of November 2022 will be met for Corporate Actions events currently offered. A number of Corporate Actions events / functionalities, which are currently not available, are planned to be implemented later (by November 2025 at the latest).
BE	Euroclear Bank	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the implementation deadline of November 2022 will be met (for standards that will be implemented in Wave 1). Further clarity on the timing is needed for Standards that will be implemented in Wave 2).
BG	BNBGSSS	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required. No milestones so far. No critical barriers identified so far. Implementation has started with regard to certain Standards, but no confirmation that the Standards will be implemented by a deadline.
BG	Central Depository AD (CD AD) – Bulgaria	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required. No milestones so far. No critical barriers identified so far. Implementation has started with regard to certain Standards, but no confirmation that the Standards will be implemented by a deadline. After migration to ISO 20022 for main Corporate Actions, the CD AD will launch a project for remaining standards not included in this first project phase.
CH	SIX SIS AG (Switzerland)	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards but no plans for implementation of ISO 20022 and this will need to be examined. The Plan explains the changes required. No milestones so far. No critical barriers identified so far. No confirmation yet that the Standards will be implemented by a deadline.
CY	Cyprus Stock Exchange (CSE) – Cyprus	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
CZ	Central Securities Depository Prague (CSD Prague) – Czech Republic	RED	<ul style="list-style-type: none"> No Adaptation Plan yet.
CZ	SKD – Czech Republic	RED	<ul style="list-style-type: none"> No Adaptation Plan yet.
DE	Clearstream Banking Frankfurt	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required. No critical barriers identified so far (Questions on Standard 6 are being considered by the CMH-TF). Most implementation milestones are provided and some will be added subject to further planning.

			<ul style="list-style-type: none"> The Plan confirms that the Standards will be implemented by the November 2022 deadline.
DK	VP Securities A/S (Denmark)	RED	<ul style="list-style-type: none"> No Adaptation Plan yet.
EE	NASDAQ (Lithuania, Estonia, Latvia)	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of most of the AMI-SeCo Corporate Actions Standards (and most ISO 20022 messages are already implemented). The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that most Standards will be implemented by the November 2022 deadline.
ES	Iberclear – BME Group (Spain)	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan clearly explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
FI	Euroclear Finland Oy	YELLOW	<ul style="list-style-type: none"> Euroclear Finland announced changes to its Adaptation Plan in June 2020 because of its roadmap for joining T2S in November 2022. It will therefore be challenging to resolve all issues in line with the original Adaptation Plan by November 2022 (and a new planning round will be initiated in 2021). The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards but implementation is planned post November 2022. The Plan explains the changes required. Further analysis is needed as regards the implementation milestones, which will be specified in the Adaptation Plan as part of the elaboration of its roadmap to join T2S. No critical barriers identified so far. The Plan does not confirm that the Standards will be implemented by the November 2022 deadline (the timeline will be confirmed as part of the overall roadmap to join T2S).
FR	Euroclear France	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
FR	ID2S (France)	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required. ISO 20022 will be implemented. No implementation milestones yet. No critical barriers identified so far. No confirmation yet of a deadline.
GR	Bank of Greece Securities Settlement System (BOGS)	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
GR	ATHEXCSD	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. Corporate Actions meeting event services are currently not provided. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
HR	Central Depository & Clearing Company Inc. (SKDD) – Croatia	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required. No critical barriers identified so far. Introduction of ISO 20022 is planned for December 2023.
HU	KELER Központi Értéktár Zrt. – KELER (Hungary)	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms the implementation deadline by November 2022 for some Standards and by the end of 2024 for other Standards. Implementation by Nov. 2024 of Standard 1B (Corporate Actions Instruction), S10 (Blocking), S12 (Fee confirmation) and S15 (Messaging).
IT	Monte Titoli S.p.A. (Italy)	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and the implementation milestones. No

			<ul style="list-style-type: none"> critical barriers identified so far. The Plan confirms implementation by the November 2022 deadline.
LT	NASDAQ (Lithuania, Estonia, Latvia)	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of most of the AMI-SeCo Corporate Actions Standards (and most ISO 20022 messages are already implemented). The Plan clearly explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan states that most Standards will be implemented by the November 2022 deadline.
LU	LuxCSD S.A. (Luxembourg)	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and most of the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
LU	Clearstream Banking Luxembourg	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standard. The Plan explains the changes required and most of the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
LV	NASDAQ (Lithuania, Estonia, Latvia)	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards (and most ISO 20022 messages are already implemented). The Adaptation Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
MT	Malta Stock Exchange plc	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required. Many milestones are provided for Standards. Requirements are being analysed for some Standards. No critical barriers identified so far. The Plan confirms the implementation deadline by November 2022 for many Standards (the implementation of harmonised business processes and workflows and ISO 20022 messages is confirmed by November 2022).
NL	Euroclear Nederland	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
PL	The Central Securities Depository of Poland (KDPW)	RED	<ul style="list-style-type: none"> No Plan provided yet (work has started).
PL	SKARBNET4	RED	<ul style="list-style-type: none"> No Plan provided yet (work has started).
PT	Interbolsa (Portugal)	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
RO	Depozitarul Central S.A. (Romania)	RED	<ul style="list-style-type: none"> No Adaptation Plan yet (NSG has been set up with a view to preparing a Plan).
RO	SaFIR (Romania)	RED	<ul style="list-style-type: none"> No Adaptation Plan yet (NSG has been set up with a view to preparing a Plan).
SE	Euroclear Sweden	RED	<ul style="list-style-type: none"> No Adaptation Plan yet (industry forum has been set up with a view to preparing a Plan).
SI	KDD – Centralna klirinško depotna družba, d.d. (Slovenia)	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
SK	Centrálny depozitár cenných papierov	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo

	SR, a. s. (Slovakia)	BLUE	<ul style="list-style-type: none"> Corporate Actions Standards. The Plan explains the changes required. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
SK	NCDCP		<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. Changes to legislation needed. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
UK	Euroclear UK & Ireland	RED	<ul style="list-style-type: none"> No plan has been provided.

Notes: The Adaptation Plans should be updated where necessary.

Table 4
Status overview: TPAs

NSG	Entity	Status	Explanation
BE	Bank of New York Mellon SA/NV	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
BE	Euroclear Bank	YELLOW	<ul style="list-style-type: none"> The CSD plan provides details on Corporate Action processing in Euroclear Bank. Awaiting confirmation that this is also the case when Euroclear Bank is acting in its role as TPA (in particular for CA Standard 1 which provides for dedicated workflows for the processing of a corporate action involving a TPA).
CH	SIX SIS	YELLOW	<ul style="list-style-type: none"> The CSD plan provides details on Corporate Action processing in SIX SIS. Awaiting confirmation that this is also the case when SIX SIS is acting in its role as TPA (in particular for CA Standard 1 which provides for dedicated workflows for the processing of a corporate action involving a TPA).
DE	Clearstream Banking Frankfurt	YELLOW	<ul style="list-style-type: none"> The CSD plan confirms that CA reporting is already available to both CT and CG. Awaiting confirmation that this is also the case when Clearstream Banking Frankfurt is acting in its role as TPA (in particular for CA Standard 1 which provides for dedicated workflows for the processing of a corporate action involving a TPA).
FR	BNP Paribas	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
FR	Euroclear France	YELLOW	<ul style="list-style-type: none"> The CSD plan provides details on Corporate Action processing in Euroclear France. Awaiting confirmation that this is also the case when Euroclear France is acting in its role as TPA (in particular for CA Standard 1 which provides for dedicated workflows for the processing of a corporate action involving a TPA).
LU	Clearstream Banking Luxembourg	YELLOW	<ul style="list-style-type: none"> The CSD plan confirms that CA reporting is already available to both CT and CG. Awaiting confirmation that this is also the case when Clearstream Banking Luxembourg is acting in its role as TPA (in particular for CA Standard 1 which provides for dedicated workflows for the processing of a corporate action involving a TPA).
LU	JP Morgan	BLUE	<ul style="list-style-type: none"> The Adaptation Plan provides support for the implementation of the AMI-SeCo Corporate Actions Standards. The Plan explains the changes required and implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.

Notes: The Adaptation Plans should be updated where necessary. For TPAs that are CSDs, the Corporate Action/custody function is normally performed by the CSD. The CSD's Plan for Corporate Actions then also applies in these cases to the TPA. This confirmation should be provided in the form of a dedicated Corporate Actions Adaptation Plan submitted by the TPA.

1.3 Billing Processes

Key takeaways

1. All but one CSD in the euro area have provided an Adaptation Plan for the AMI-SeCo Standards for Billing Processes (Malta Stock Exchange).
2. Many CSDs outside the euro area support the implementation of the AMI-SeCo Standards for Billing Processes. The plan produced by the CSD for Hungary (KELER) is the most advanced, while other plans have made significant progress as regards the impact assessment.
3. No Plans have been received from the CSDs in the Czech Republic, Denmark, Poland, Romania, Sweden and the United Kingdom. NSGs or industry fora are being set up or re-activated in these markets for implementation of the Standards. The CSD in the United Kingdom is the least advanced from a planning point of view.
4. For TPAs, confirmation is required that the information in the Adaptation Plan provided by a CSD also applies when the same entity acts as a TPA.

Table 5
Status overview: (I)CSDs

NSG	Entity	Status	Explanation
AT	Oesterreichische Kontrollbank Aktiengesellschaft (Austria)	BLUE	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
BE	Euroclear Bank	BLUE	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
BE	Euroclear Belgium	BLUE	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
BE	National Bank of Belgium Securities Settlement System (NBB-SSS)	BLUE	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
BG	BNBGSSS	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required but no milestones are provided yet. No critical barriers identified so far. The Plan does not confirm that the Standards will be implemented by a deadline.
BG	Central Depository AD (CD AD) – Bulgaria	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required but no milestones are provided yet. No critical barriers identified so far.

			<ul style="list-style-type: none"> barriers identified so far. The Plan does not confirm that the Standards will be implemented by a deadline.
CH	SIX SIS AG (Switzerland)	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains some of the changes required and some of the implementation milestones. Standard 4 (on payment due date set) needs to be complemented. No critical barriers identified so far. The Plan does not confirm that the Standards will be implemented by a deadline.
CY	Cyprus Stock Exchange (CSE) – Cyprus	BLUE	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
CZ	Central Securities Depository Prague (CSD Prague) – Czech Republic	RED	<ul style="list-style-type: none"> No Plan
CZ	SKD – Czech Republic	RED	<ul style="list-style-type: none"> No Plan
DE	Clearstream Banking Frankfurt	BLUE	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required (Feasibility Assessment) and most implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
DK	VP Securities A/S (Denmark)	RED	<ul style="list-style-type: none"> No Plan
EE	NASDAQ (Lithuania, Estonia, Latvia)	BLUE	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
ES	Iberclear – BME Group (Spain)	BLUE	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
FI	Euroclear Finland Oy	YELLOW	<ul style="list-style-type: none"> Euroclear Finland announced changes to its Adaptation Plan in June 2020 because of its roadmap for joining T2S in November 2022. It will therefore be challenging to resolve all issues in line with the original Adaptation Plan by November 2022 (and a new planning round will be initiated in 2021). The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required but some milestones will need to be added (when available for T2S migration). No critical barriers identified so far. The Plan does not confirm that the Standards will be implemented by the November 2022 deadline.
FR	Euroclear France	BLUE	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains changes required and most milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
FR	ID2S (France)	YELLOW	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required but some milestones to be added. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
GR	Bank of Greece Securities Settlement System (BOGS)	BLUE	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required (Feasibility Assessment) and implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022

GR	ATHEXCSD	BLUE	<ul style="list-style-type: none"> • The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. • The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. • The Plan confirms that the Standards will be implemented by the November 2022 deadline.
HR	Central Depository & Clearing Company Inc. (SKDD) – Croatia	YELLOW	<ul style="list-style-type: none"> • The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. • The Plan explains the changes required. No critical barriers identified so far. • The Plan does not confirm that the Standard on ISO 20022 will be implemented by a specific deadline (but the introduction of ISO 20022 is planned in the long term).
HU	KELER Központi Értéktár Zrt. – KELER (Hungary)	BLUE	<ul style="list-style-type: none"> • The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. • The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. • The Plan confirms that the Standards will be implemented by the November 2022 deadline.
IT	Monte Titoli S.p.A. (Italy)	BLUE	<ul style="list-style-type: none"> • The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. • The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. • The Plan confirms that the Standards will be implemented by the November 2022 deadline.
LT	NASDAQ (Lithuania, Estonia, Latvia)	BLUE	<ul style="list-style-type: none"> • The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. • The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. • The Plan confirms that the Standards will be implemented by the November 2022 deadline.
LU	LuxCSD S.A. (Luxembourg)	BLUE	<ul style="list-style-type: none"> • The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. • The Plan explains the changes required and most implementation milestones. No critical barriers identified so far. • The Plan confirms that the Standards will be implemented by the November 2022 deadline.
LU	Clearstream Banking Luxembourg	BLUE	<ul style="list-style-type: none"> • The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. • The Plan explains the changes required and most of the implementation milestones. • No critical barriers identified so far. • The Plan confirms that the Standards will be implemented by the November 2022 deadline.
LV	NASDAQ (Lithuania, Estonia, Latvia)	BLUE	<ul style="list-style-type: none"> • The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. • The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. • The Plan confirms that the Standards will be implemented by the November 2022 deadline.
MT	Malta Stock Exchange plc	RED	<ul style="list-style-type: none"> • No Plan
NL	Euroclear Nederland	BLUE	<ul style="list-style-type: none"> • The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. • The Plan explains changes required and most milestones. No critical barriers identified so far. • The Plan confirms that the Standards will be implemented by the November 2022 deadline.
PL	The Central Securities Depository of Poland (KDPW)	RED	<ul style="list-style-type: none"> • No Plan
PL	SKARBNET4	RED	<ul style="list-style-type: none"> • No Plan
PT	Interbolsa (Portugal)	BLUE	<ul style="list-style-type: none"> • The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. • The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. • The Plan confirms that the Standards will be implemented by the November 2022 deadline.

			deadline.
RO	Depozitarul Central S.A. (Romania)	RED	<ul style="list-style-type: none"> No Plan
RO	SaFIR (Romania)	RED	<ul style="list-style-type: none"> No Plan
SE	Euroclear Sweden	RED	<ul style="list-style-type: none"> No Plan
SI	KDD – Centralna klirinško depotna družba, d.d. (Slovenia)	BLUE	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
SK	Centrálny depozitár cenných papierov SR, a. s. (Slovakia)	BLUE	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
SK	NCDPCP	BLUE	<ul style="list-style-type: none"> The Adaptation Plan supports the implementation of the AMI-SeCo Standards for Billing Processes. The Plan explains the changes required and the implementation milestones. No critical barriers identified so far. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
UK	Euroclear UK & Ireland	RED	<ul style="list-style-type: none"> No Plan

Notes: The Adaptation Plans should be updated where necessary.

Table 6**Status overview: TPAs**

NSG	Entity	Status	Explanation
BE	Bank of New York Mellon SA/NV	BLUE	<ul style="list-style-type: none"> The Adaptation Plan clearly explains the changes required and the implementation milestones. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
BE	Euroclear Bank	YELLOW	<ul style="list-style-type: none"> The CSD's Adaptation Plan clearly explains the changes required and the implementation milestones. The Plan confirms that the Standards will be implemented by the November 2022 deadline. Awaiting confirmation that the CSD plan is also applicable when acting in its role as TPA.
CH	SIX SIS	YELLOW	<ul style="list-style-type: none"> The CSD's plan does not confirm that all Standards will be implemented by the November 2022 deadline. Awaiting confirmation that this is also the case when acting in its role as TPA.
DE	Clearstream Banking Frankfurt	YELLOW	<ul style="list-style-type: none"> The CSD's Adaptation Plan clearly explains the changes required. Interim implementation milestones for Internal adaptation are subject to further planning. The Plan confirms that the Standards will be implemented by the November 2022 deadline. Awaiting confirmation that the CSD plan is also applicable when acting in its role as TPA.
FR	BNP Paribas	BLUE	<ul style="list-style-type: none"> The Adaptation Plan clearly explains the changes required, and the implementation milestones. The Plan confirms that the Standards will be implemented by the November 2022 deadline.
FR	Euroclear France	YELLOW	<ul style="list-style-type: none"> The CSD's Adaptation Plan clearly explains changes required and most milestones. The Plan confirms that the Standards will be implemented by the November 2022 deadline. Awaiting confirmation that the CSD plan is also applicable when acting in its role as TPA.
LU	Clearstream Banking Luxembourg	YELLOW	<ul style="list-style-type: none"> The CSD's Adaptation Plan clearly explains the changes required. Interim implementation milestones for Internal Adaptation are subject to further planning. The Plan confirms that the Standards will be implemented by the November 2022 deadline. Awaiting confirmation that the CSD plan is also applicable when acting in its role as TPA.
LU	JP Morgan	BLUE	<ul style="list-style-type: none"> The Adaptation Plan clearly explains the changes required, and the implementation milestones. The Plan confirms that the Standards will be implemented by the November 2022 deadline.

Notes: The Adaptation Plans should be updated where necessary.

2 Feasibility Assessments

(I)CSDs and TPAs in AMI-SeCo markets were asked to assess the feasibility of the changes required in their markets in order to adhere to the AMI-SeCo Standards. For each Standard, the respective actors were also asked to conduct an assessment in accordance with the table below.

Table 7
Feasibility Assessment – legend

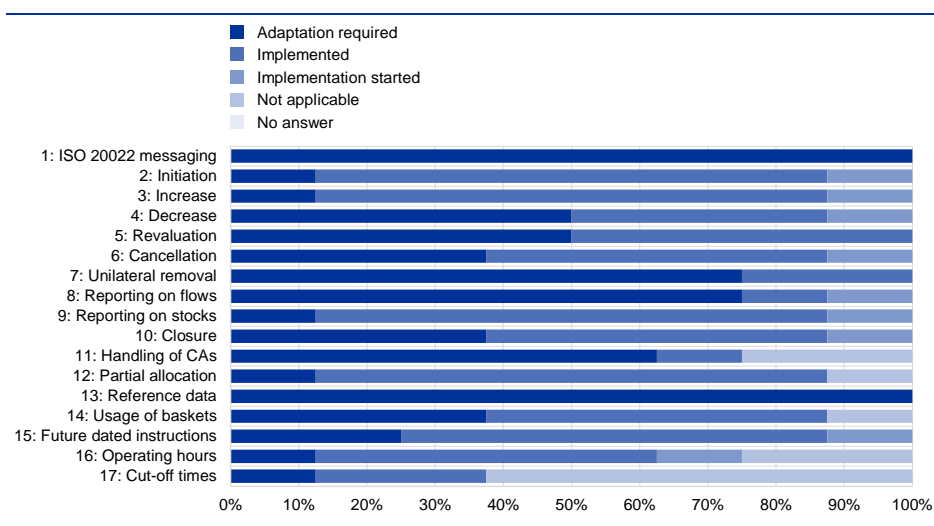
A/R	=	Adaptation required
I	=	Implemented
I/S	=	Implementation started
N/A	=	Not applicable

Where adaptations are required, information was also requested on the nature of the adaptations required (e.g. legal, technical, etc.). Each institution was also requested to identify if there were any legal barriers preventing the implementation of the AMI-SeCo Standard. This section provides more information on the feasibility assessments.

2.1 Triparty Collateral Management

Chart 1

Overview of responses: Adaptations required for each AMI-SeCo Standard



Notes: Percentages are calculated on the basis of total expected respondents. In the case of Triparty Collateral Management, 8 responses are expected (i.e. one for each TPA).

2.1.1 Summary

Summary of key takeaways from the feasibility assessments provided in the individual Adaptation Plans.

Adaptations required

- Most adaptations are primarily required in relation to Standards 1 (ISO 20022), 7 (Unilateral removal), 8 (Reporting on flows), 11 (Corporate action handling) and 13 (Reference data).
- Fewest adaptations are required in relation to Standards 2 (Initiation), 3 (Increase), 9 (Reporting on stocks), 12 (Partial settlement), 16 (Operating hours) and 17 (Cut-off times).
- The remaining Standards fall between the two and require some adaptations in order to achieve compliance, i.e. 4 (Decrease), 5 (Revaluation), Standard 6 (Cancellation), 10 (Closure), 15 (Future dated processing) and 14 (Baskets).

Nature of adaptations required

- The adaptations required are primarily related to internal IT applications (e.g. new business process, message validation, message routing and formats).

Legal barriers

- No legal barriers were identified.

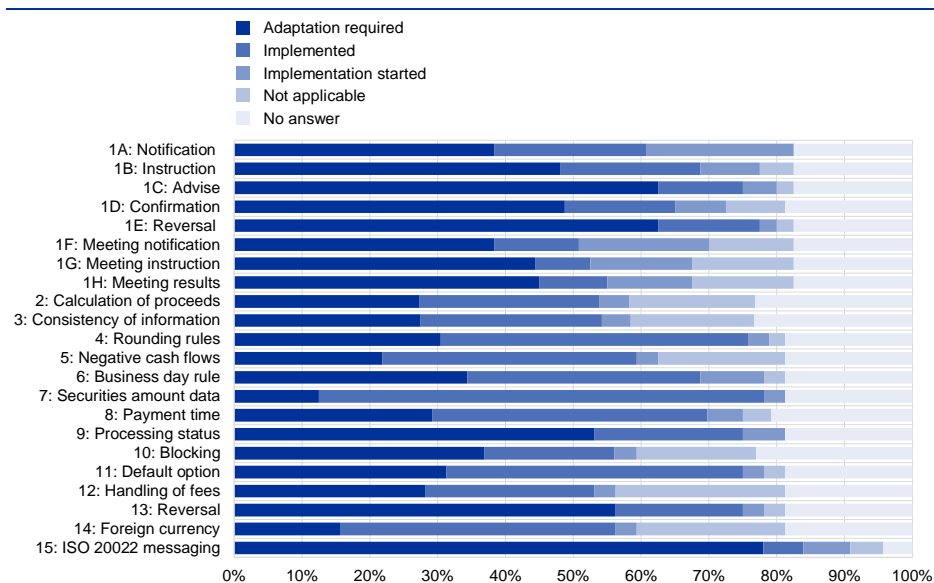
2.1.2 Action points

- Finalisation of messages (ongoing work with SWIFT).

2.2 Corporate Actions

Chart 2

Overview of responses: Adaptations required by AMI-SeCo Standard



Notes: Percentages are calculated on the basis of total expected respondents. In the case of corporate actions, 46 responses are expected for the relevant standards (i.e. 38 CSDs plus 8 TPAs).

2.2.1 Summary

Summary of key takeaways from the feasibility assessment provided in the individual Adaptation Plans.

Adaptations required

- Most adaptations are primarily required in relation to Standard 15 (ISO 20022). In addition, Standard 1 (Business processes and workflows) and Standard 13 (Reversal) also require adaptations.
- Fewest adaptations are required in relation to Standard 7 (Securities amount data) and Standard 14 (Foreign currency).
- Some adaptations are needed for the remaining Standards.
- Initiatives are currently underway to comply with the SRDII directive by September 2020 which will also help achieve compliance with some of the AMI-SeCo Standards (in particular Standard 1 and Standard 15).
- Some (I)CSDs already comply with a large number of Standards.

Nature of adaptations required

- The adaptations required are primarily related to the updating of internal IT applications, e.g. introduction of new business processes, inclusion of additional event types to ensure consistent processing of CA events types, and messaging formats.
- In some jurisdictions (i.e. in the Slovakian market) legislative changes will be introduced in order to ensure compliance with the Standards. Some CSDs will also update their terms and conditions in order to adhere to the Standards.
- Regarding Standard 6 (Business day rule), some Plans explained that the implications for existing securities need to be analysed (e.g. a question was raised as to whether there is a need to update terms and conditions to ensure compliance). The Expert Group on Asset Servicing (operating under AMI-SeCo's CMH-TF) has prepared guidance on this topic.
- Regarding Standard 5 (Negative cash flows), the DK NSG is considering a way forward for their market in order to ensure compliance. The Expert Group on Asset Servicing has provided guidance on this topic.

Legal barriers

- No legal barriers were identified.

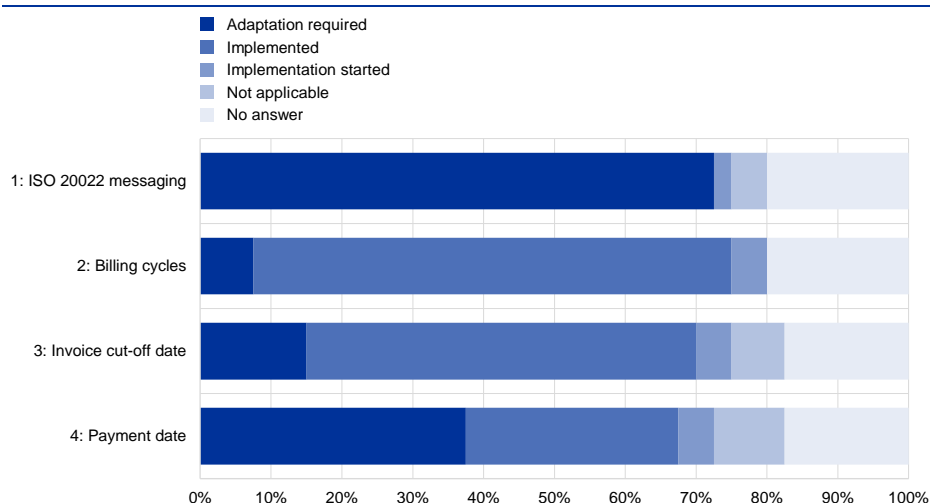
2.2.2 Action points

- The Expert Group on Asset Servicing has defined draft AMI-SeCo guidance for the application of the Business Day Rule (Standard 6) to existing securities bearing the Modified Following Business Day Convention. The Expert Group has also provided guidance to the DK market on the conditions necessary to ensure compliance with Standard 5 (Negative cash flows).

2.3 Billing Processes

Chart 3

Overview of responses: Adaptations required by AMI-SeCo Standard



Notes: Percentages are calculated on the basis of total expected respondents. In the case of billing processes, 46 responses are expected for the relevant standards (i.e. 38 CSDs plus 8 TPAs).

2.3.1 Summary

Summary of key takeaways from the feasibility assessment provided in the individual Adaptation Plans.

Adaptations required

- Adaptations are primarily required in relation to Standard 1 (ISO 20022).
- Fewest adaptations are required in relation to Standard 2 (Harmonised billing cycles), which prescribes that billing information shall be provided on a monthly basis, and Standard 3 (Cut-off date for provision of billing information by (I)CSDs), as billing information is often already provided in accordance with the Standard.
- Some adaptations are needed for Standard 4 (Harmonised dates for payment of fees to (I)CSDs). Currently, the payment date for each billing cycle is different and the dates will be moved to the 15th of the month.

Nature of adaptations required

- The adaptations required are primarily related to the update of internal IT applications for billing messages.

Legal barriers

- No legal barriers were identified. One plan (IT NSG) identified a potential legal barrier with respect to Standard 1, because it is not possible to cancel an invoice in its jurisdiction. The Plan explains that in such cases the correction will be carried out in the following month (in line with the guidance provided for under Standard 1).

2.3.2 Actions points

- Definition of usage guideline for camt.077 billing message (currently being finalised in conjunction with SWIFT following a consultation of AMI-SeCo stakeholders).

3 Implementation Milestones

(I)CSDs and TPAs in AMI-SeCo markets were asked to provide information on key milestones during the implementation phase. The respective actors have provided information on the feasibility of (i) the predefined key milestones for the implementation of the AMI-SeCo Standards, and (ii) additional interim milestones throughout the implementation phase. This section provides more information on the implementation milestones.

3.1 Triparty Collateral Management

Chart 4

Overview of responses: Key implementation milestones

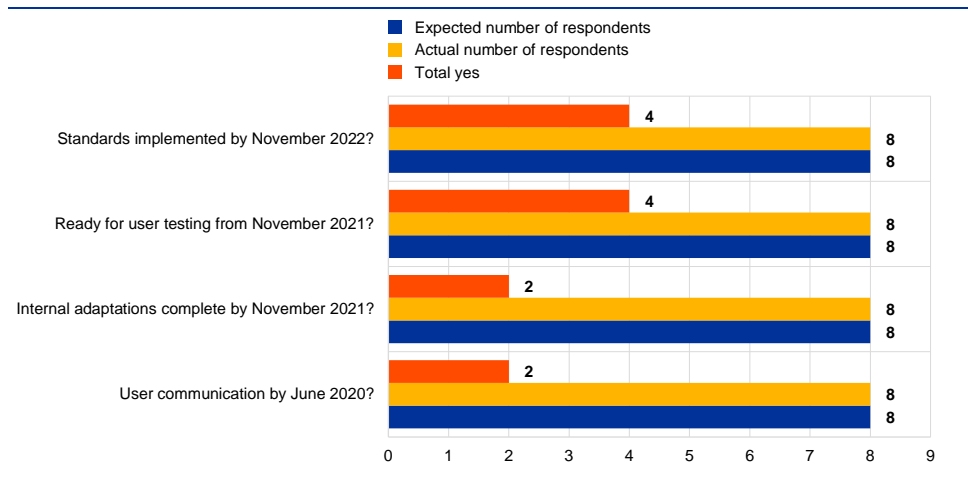


Table 8

Individual response by entity: TPAs

NSG	Entity	User communication (by 06/2020)	Internal adaptation (by 11/2021)	User testing (from 11/2021)	Standards implemented (by 11/2022)	Notes
BE	Bank of New York Mellon SA/NV	YES (06/2020)	YES (Q3 2020-Q1 2021)	YES (11/2021)	YES (11/2022)	User testing based on client request
BE	Euroclear Bank	TBC	TBC	TBC	TBC	After T2S migration
CH	SIX SIS	TBC	TBC	TBC	TBC	If TPA opts for Direct Membership with T2S
DE	Clearstream Banking Frankfurt	YES [Q3/2020]	YES (04/2020-05/2022)	YES (11/2021)	YES (11/2022)	
FR	BNP Paribas	YES (06/2020)	YES (2020/2021)	YES (11/2021)	YES	
FR	Euroclear France	TBC	TBC	TBC	NO	Will be done after the implementation of the Floating Collateral Management service
LU	Clearstream Banking Luxembourg	YES (Q3 2020)	YES (04/2020-05/2022)	YES (11/2021)	YES (11/2022)	
LU	JP Morgan	TBC	TBC	TBC	YES	

Summary

The following entities have provided detailed milestones (based on their first feasibility assessment and which could be subject to further changes after more detailed analysis):

- Bank of New York Mellon (BE NSG)
- BNP Paribas (FR NSG)
- Clearstream Banking Frankfurt (DE NSG)
- Clearstream Banking Luxembourg (LU NSG)
- JP Morgan (LU NSG)

The following entities have not yet provided all implementation milestones:

- Euroclear Bank (BE NSG)
- SIX SIS (CH NSG)
- Euroclear France (FR NSG)

User communication

- User communication will commence by June 2020 and will consist of high-level information to raise awareness among clients regarding the upcoming changes.

- More detailed communication is planned by TPAs as they move through the design and development process. Additional communication milestones will be added in the AMI-SeCo monitoring process to track progress accordingly.

Internal adaptation

Internal adaptations of IT systems have already commenced in some instances and are scheduled to be complete by November 2021. More detailed steps are being considered as follows:

- Impact analysis and review of requirements between now and the third quarter of 2020;
- Development would take place between the fourth quarter of 2020 and the fourth quarter of 2021;
- Internal testing and resolution of issues would take place from the first quarter of 2021 onwards.

User testing

TPAs confirmed that testing would be supported in November 2021 (subject to users being ready). Some reporting entities proposed that testing should first take place between TPAs and major users (i.e. central banks and CCPs). Following the successful execution of these tests, testing would then be opened up to all users. One TPA (BNY Mellon) noted that, while it would be ready to commence end-user testing by the date specified, this would be subject to end-user demand to conduct testing by this date.

Standards implemented

Most reporting entities are committed to adopting the AMI-SeCo Standards for Triparty Collateral Management by November 2022. Further clarification is needed on the plans of SIX SIS, Euroclear Bank and Euroclear France.

3.2 Corporate Actions

Chart 5

Overview of responses: Key implementation milestones

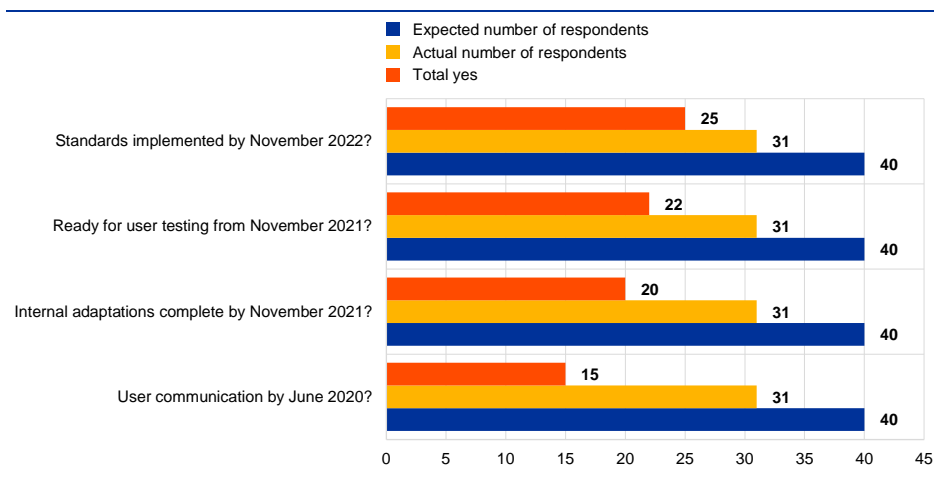


Table 9

Individual response per entity: CSDs

NSG	Entity	User communication (by 06/2020)	Internal adaptation (by 11/2021)	User testing (from 11/2021)	Standards implemented (by 11/2022)	Notes
AT	Oesterreichische Kontrollbank Aktiengesellschaft (Austria)	YES (Q1 2021)	(Q2/Q4 2021)	YES (Q1 2022)	YES	
BE	Euroclear Belgium	(2020-2021)	YES (2020-2021)	YES	YES	
BE	National Bank of Belgium Securities Settlement System (NBB-SSS)	YES (2/9/2019-11/9/2019)	YES (Q1 2020)	YES	YES	
BE	Euroclear Bank	(2020-2021)	YES (2020-2021)	YES	YES	
BG	BNB Government Securities Registration and Settlement System (BNBGSSS)	TBC	TBC	TBC	TBC	Being planned
BG	Central Depository AD (CD AD) – Bulgaria	TBC	TBC	TBC	TBC	Being planned
CH	SIX SIS AG (Switzerland)	TBC	TBC	TBC	TBC	Being planned
CY	Cyprus Stock Exchange (CSE) – Cyprus	YES	YES	YES	YES	
CZ	Central Securities Depository Prague (CSD Prague) – Czech Republic					
CZ	SKD					
DE	Clearstream Banking Frankfurt (Germany)	(Q3 2020)	TBC	YES	YES	
DK	VP Securities A/S (Denmark)					

EE	NASDAQ (Lithuania, Estonia, Latvia)	YES	YES	YES	YES	
ES	Iberclear – BME Group (Spain)	YES	YES (Q4 2019-11/21)	YES	YES	
FI	Euroclear Finland Oy	(Later/for SRDII)	(Later with T2S)	TBC	TBC	Info Q2 2021
FR	Euroclear France	(2020-2021)	YES (2020-2021)	YES	YES	
FR	ID2S (France)	TBC	TBC	TBC	TBC	
GR	Bank of Greece Securities Settlement System (BOGS)	YES	YES	YES	YES	
GR	ATHEXCSD	YES (and in due time)	YES	YES	YES	
HR	Central Depository & Clearing Company Inc. (SKDD) – Croatia	TBC	TBC	TBC	TBC	
HU	KELER Kőzponti Értéktár Zrt. – KELER (Hungary)	(Q4 2022)	(Q4 2023)	(Q4 2023)	(Q4 2024)	Being planned
IT	Monte Titoli S.p.A. (Italy)	YES	YES (2020-11/21)	YES	YES	
LT	NASDAQ (Lithuania, Estonia, Latvia)	YES	YES	YES	YES	
LU	LuxCSD S.A. (Luxembourg)	(Q3 2020)	TBC	YES	YES	
LU	Clearstream Banking Luxembourg	(Q3 2020)	TBC	YES	YES	
LV	NASDAQ (Lithuania, Estonia, Latvia)	YES	YES	YES	YES	
MT	Malta Stock Exchange plc	YES	YES	YES	YES	
NL	Euroclear Nederland	(2020-2021)	YES	YES	YES	
PL	The Central Securities Depository of Poland (KDPW)					
PL	SKARBNET4					
PT	Interbolsa (Portugal)	YES	YES	YES	YES	
RO	Depozitarul Central S.A. (Romania)					
RO	SaFIR (Romania)					
SE	Euroclear Sweden					
SI	KDD – Centralna klirinško depotna družba, d.d. (Slovenia)	YES	YES	YES	YES	
SK	Centrálny depozitár cenných papierov SR, a. s. (Slovakia)	YES	YES	YES	YES	
SK	NCDPC (Slovakia)	YES	YES (01/2020-06/2021)	YES (06/2021-06/2022)	YES	
UK	Euroclear UK & Ireland					

Table 10

Individual response per entity: TPAs

NSG	Entity	User communication (by 06/2020)	Internal adaptation (by 11/2021)	User testing (from 11/2021)	Standards implemented (by 11/2022)	Notes
BE	Bank of New York Mellon SA/NV	YES	YES (Q3 2020-11/ 2021)	YES	YES	
BE	Euroclear Bank	(2020-2021)	YES (2020-2021)	YES	YES	[as per CSD information provided above]
CH	SIX SIS					[as per CSD information provided above]
DE	Clearstream Banking Frankfurt	(Q3 2020)	TBC	YES	YES	[as per CSD information provided above]
FR	BNP Paribas	YES (06/2020)	2020/2021	YES (11/2021)	YES	
FR	Euroclear France	(2020-2021)	YES (2020-2021)	YES	YES	[as per CSD information provided above]
LU	Clearstream Banking Luxembourg	(Q3 2020)	TBC	YES	YES	[as per CSD information provided above]
LU	JP Morgan				YES	

Summary

User communication

User communication will commence by June 2020. It will consist of high-level information to raise awareness among clients regarding the upcoming changes (e.g. newsletters in 2020 to highlight the main changes, etc.)

More detailed communication is planned by CSDs as they move through the design and development process. In this context, it is proposed to include additional milestones in the AMI-SeCo monitoring process entitled “Detailed user communication” (target date: May 2021) and “Final user communication” (target date: May 2022) in order to monitor progress in this regard. Further detail can be found in Section 3.4.

Internal adaptation

Almost all reporting entities suggested that internal adaptation is possible by November 2021. Some respondents provided more detailed milestones as follows:

- Set-up of project, technical specifications of new functionalities and legal changes (if any) – by January 2020.
- Designing and adoption of an internal adaptation plan – from January 2020 to March 2020.
- IT analysis – by June 2020.

- Communication of relevant details of changes to existing processes to the clients – June 2020.
- Software programming – from June 2020 to June 2021.

This will be used as a basis for tracking progress throughout the implementation phase.

User testing

The majority of reporting entities proposed that testing should take place from November 2021 (some suggested that testing should take place first for major users before opening up the testing environment to all users).

Standards implemented

The majority of reporting entities are committed to adopting the AMI-SeCo Standards for Corporate Actions by November 2022. In some cases further clarification is being requested as the Adaptation Plans are incomplete.

3.3 Billing Processes

Chart 6

Overview of responses: Key implementation milestones

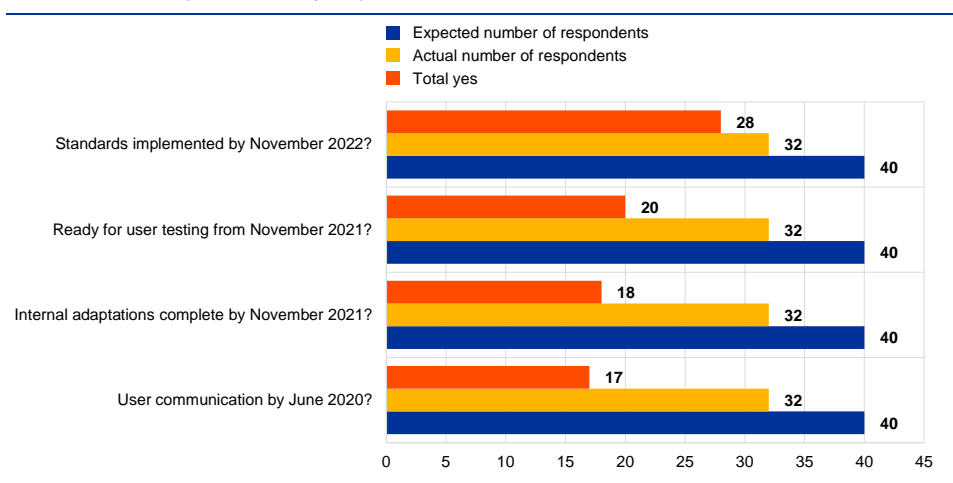


Table 11

Individual response by entity: CSDs

NSG	Entity	User communication (by 06/2020)	Internal adaptation (by 11/2021)	User testing (from 11/2021)	Standards implemented (by 11/2022)	Notes
AT	Oesterreichische Kontrollbank Aktiengesellschaft	(Q1 2021)	YES (Q2/Q4 2021)	(Q1 2022)	YES	

	(Austria)					
BE	Euroclear Belgium	N/A	(06/2022)	(04-05/2022)	YES	
BE	National Bank of Belgium Securities Settlement System (NBB-SSS)	YES (2/9/2019-11/9/2019)	YES (Q1 2020)	YES	YES	
BE	Euroclear Bank	N/A	(06/2022)	(04-05/2022)	YES	
BG	BNB Government Securities Registration and Settlement System (BNBGSSS)	TBC	TBC	TBC	TBC	Being planned
BG	Central Depository AD (CD AD) – Bulgaria	TBC	TBC	TBC	TBC	Being planned
CH	SIX SIS AG (Switzerland)		(Q3 2021)	(Q4 2021)	YES	
CY	Cyprus Stock Exchange (CSE) – Cyprus	YES	YES	YES	YES	
CZ	Central Securities Depository Prague (CSD Prague) – Czech Republic					
CZ	SKD					
DE	Clearstream Banking AG (Germany)	(Q3 2020)	TBC	YES	YES	
DK	VP Securities A/S (Denmark)					
EE	NASDAQ (Lithuania, Estonia, Latvia)	YES	YES	YES	YES	
ES	Iberclear – BME Group (Spain)	YES	YES (Q4/2019-11/2021)	YES	YES	
FI	Euroclear Finland Oy	NO (for SRDII)	NO (TBD)	NO (TBD)	TBC	Planning being revised.
FR	Euroclear France	N/A	(06/2022)	(04-05/2022)	YES	
FR	ID2S (France)					
GR	Bank of Greece Securities Settlement System (BOGS)	YES	YES	YES	YES	
GR	ATHEXCSD	YES (in due time)	YES	YES	YES	
HR	Central Depository & Clearing Company Inc. (SKDD) – Croatia					
HU	KELER Központi Értéktár Zrt. – KELER (Hungary)	YES	YES	YES	YES	
IT	Monte Titoli S.p.A. (Italy)	YES	YES (2020-11/2021)	YES	YES	
LT	NASDAQ (Lithuania, Estonia, Latvia)	YES	YES	YES	YES	
LU	LuxCSD S.A. (Luxembourg)	(Q3 2020)	TBC	YES	YES	
LU	Clearstream Banking Luxembourg	(Q3 2020)	TBC	YES	YES	
LV	NASDAQ (Lithuania, Estonia, Latvia)	YES	YES	YES	YES	
MT	Malta Stock Exchange plc	N/A	N/A	N/A	N/A	
NL	Euroclear Nederland	N/A	(06/2022)	(04-05/2022)	YES	

PL	The Central Securities Depository of Poland (KDPW)					
PL	SKARBNET4					
PT	Interbolsa (Portugal)	YES	YES	YES	YES	
RO	Depozitarul Central S.A. (Romania)					
SE	Euroclear Sweden					
SI	KDD – Centralna klirinško depotna družba, d.d. (Slovenia)	YES	YES	YES	YES	
SK	Centrálny depozitár cenných papierov SR, a. s. (Slovakia)	YES	YES	YES	YES	
SK	NCDCP (Slovakia)	YES	YES	YES	YES	
UK	Euroclear UK & Ireland					

Table 12
Individual response by entity: TPAs

NSG	Entity	User communication (by 06/2020)	Internal adaptation (by 11/2021)	User testing (from 11/2021)	Standard implemented (by 11/2022)	Notes
BE	Bank of New York Mellon SA/NV	YES	YES (Q3 2020 – Q1 2021)	YES	YES	
BE	Euroclear Bank	N/A	(06/2022)	(04-05/2022)	YES	[as per CSD information provided above]
CH	SIX SIS		(Q3 2021)	(Q4 2021)	YES	[as per CSD information provided above]
DE	Clearstream Banking Frankfurt	(Q3 2020)	TBC	YES	YES	[as per CSD information provided above]
FR	BNP Paribas	YES (06/2020)	2020/2021	YES (11/2021)	YES	
FR	Euroclear France	N/A	(06/2022)	(04-05/2022)	YES	[as per CSD information provided above]
LU	Clearstream Banking Luxembourg	(Q3 2020)	TBC	YES	YES	[as per CSD information provided above]
LU	JP Morgan	Q3 2020	2021 – Q1 2022	2021 – Q1 2022	YES	

Summary

User communication

User communication will commence by June 2020, which will consist of high-level information to raise awareness among clients of the upcoming changes (e.g. newsletters in 2020 to highlight the main changes, etc.).

More detailed communication is planned by CSDs as they move through the design and development process.

Internal adaptation

Internal adaptations have already commenced in the majority of cases with adaptations anticipated to be complete by November 2021. Euroclear CSDs explained that internal adaptations will be complete by June 2022, but confirm that the Standards will still be implemented by the November 2022 deadline.

User testing

The majority of reporting entities proposed that testing should take place from November 2021 (some suggested first for major users and following the successful execution of these tests, testing would then be opened up to all users). BNY Mellon noted that while it would be ready to commence end-user testing by the date specified this would be subject to end-user demand to conduct testing by this date.

Standards implemented

Most reporting entities are committed to adopting the AMI-SeCo Standards for Billing Processes by November 2022 (with the exception of SIX SIS).

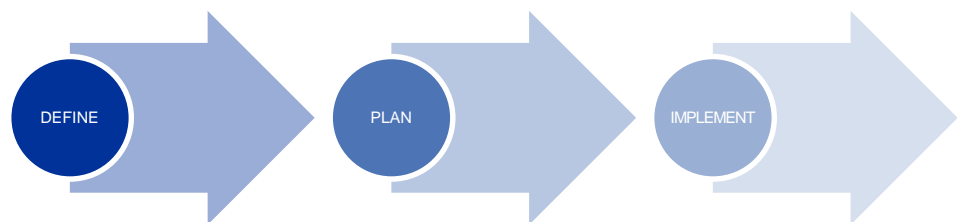
4 The next phase – implementation

Following the submission of the Adaptation Plans, AMI-SeCo will commence its monitoring of the implementation phase during the first half of 2020. The monitoring surveys are issued twice per year and are scheduled to allow submission of the monitoring reports to the respective AMI-SeCo meetings in the first and second halves of each year.

AMI-SeCo agreed that each monitoring round should assess progress against agreed milestones (as a basis for the colour-coding assessment). The following overall milestones were identified in the [Monitoring Framework](#).³ Milestones 6-10 listed below are of relevance for the next phase (implementation phase).

Figure 3

Overall key milestones (as defined in the Monitoring Framework)



³ See Section 2.3.

Table 13

Overall key milestones (as defined in the Monitoring Framework)

No.	Name	Description	Phase
1	Define Standards	Following agreement by the AMI-SeCo on the harmonisation proposals, the AMI-SeCo community defines AMI-SeCo Standards.	DEFINE
2	Publish rulebook	Detailed rulebook providing sufficient detail on each Standard, so that the targeted stakeholders know what to do to prepare themselves to be compliant.	
3	Establish project	Participants establish an internal project and nominate a project manager, who acts as a point of contact for the NSG/CMH-TF secretariat on the implementation of the AMI-SeCo Standards.	PLAN
4	Conduct impact assessment	Each participant conducts an assessment of the impact of the AMI-SeCo Standards on existing processes. Any legal barriers preventing the adoption of an AMI-SeCo Standard should be highlighted.	
5	Submit plan	Each CSD and TPA submits a detailed plan on how it intends to comply with the AMI-SeCo Standard.	
6	Internal adaptation	Phase during which each participant completes all necessary internal adaptations, e.g. adaptation of IT systems, procedures, legal changes.	IMPLEMENT
7	Client communication	Public communication to inform clients of changes to existing processes.	
8	Internal testing	Period during which each participant completes internal testing prior to testing with its users.	
9	User testing	Period during which each provider conducts testing with its users prior to the adoption of the AMI-SeCo Standards.	
10	Harmonisation achieved	The AMI-SeCo Standards have been adopted.	

In the context of the work on the Adaptation Plans, the following dates were also identified for the key milestones related to the implementation of the AMI-SeCo Standards for Triparty Collateral Management, Corporate Actions and Billing Processes.

- June 2020: **Communication**
- November 2021: End of internal **adaptations** and start of **user testing**
- November 2022: Standards implemented.

4.1 Key deliverables

As shown in Box 3 above, implementation monitoring is thus focused around the following three key deliverables:

- **Adaptation of internal processes**
- **Communication**
- **Testing**

Implementation is complete when all deliverables have been successfully completed.

Figure 4

Key deliverables during the Implementation Phase

The Adaptation Plans have been prepared, now it's time to ACT!



Adapt
processes in
accordance with the
Adaptation Plan



Communicate
details of upcoming
changes to your
users



Test
the changes with
your user
community

On the basis of the overall milestones, this section now provides detailed guidance on the milestones which should be met in order to achieve the key deliverables.

Adaptation

- By April 2020: Internal analysis of all technical changes to be implemented (e.g. new messaging formats and internal adaptations required to IT systems) should have started in order to identify the business requirements and functional specifications.
- By November 2020: Internal analysis of all technical changes to be implemented (e.g. new messaging formats) should be complete and internal adaptations of IT systems and processes should have started.
- By May 2021: Internal adaptation of IT systems/procedures/other changes (if relevant) should be in progress to enable internal testing to commence.
- By November 2021: Internal adaptations should be complete.

Communication

- By June 2020: Initial communication from providers to users should be launched. This takes the form of general communication in order to raise awareness among users of upcoming changes (information contained in the final Adaptation Plan could be used as a basis).
- By May 2021: Additional communication should take place to facilitate implementation of technical changes by the user community. This additional

communication should include information on message usage guidelines⁴ and planned user testing activities.

- By May 2022: Final communication to users on the implementation of the Standards.

Testing

- From May 2021: Internal testing should commence (as part of internal adaptations).
- By November 2021: User testing should commence.
- By May 2022: User testing should be in progress.
- By November 2022: Testing should be finalised and implementation complete.
- Further details are presented in the chronological overview in the following section.

4.2 Chronological overview

Implementation progress against each of the above deliverables will be monitored in accordance with the AMI-SeCo monitoring framework methodology to be applied during the implementation phase.

Figure 5
SCoREBOARD – Implementation Phase



- The Standard has been implemented
- Implementation of the Standard is on schedule (based on the agreed milestones)
- Implementation is behind schedule (based on the agreed milestones)
- Implementation has not started

For custodians, progress will be monitored and reported as a percentage, for example the percentage of custodians in a given market that have started internal adaptation of IT systems.

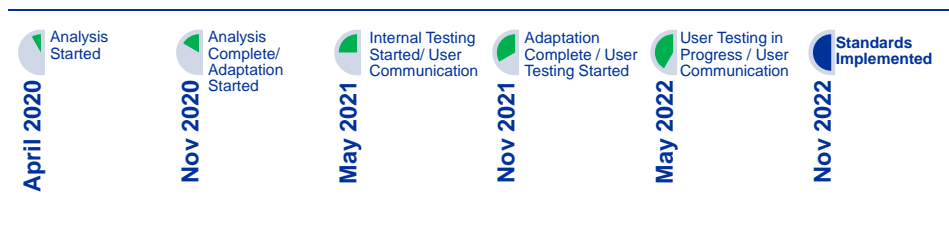
Each survey will also include a forward-looking assessment to confirm confidence that future milestones will be met in order to ensure early awareness and resolution of issues that may impede the progress of a market to adopt the Standards on time.

⁴ For new messages (e.g. triparty), this will be based on non-registered latest drafts produced by SWIFT.

The complete list of deliverables and associated milestones are listed below in chronological order. The dates refer to the month in which the survey should be completed by the reporting entity (e.g. survey 1 should be completed by April 2020).

Figure 6

Overview of key deliverables in chronological order: Timeline



Survey 1 – April 2020: to measure progress against the following aspects:

- **[ADAPT] Analysis Started:** has the analysis of all technical changes to be implemented (e.g. new messaging formats and internal adaptations required to IT systems) started in order to prepare business requirements and functional documentation? If not, the entity will be considered behind schedule.
- **[COMMUNICATE] Initial User Communication:** is initial communication to users planned to take place by June 2020? If no high-level communication is planned, the entity will be considered behind schedule.

The entity should be on track on both aspects of the milestone in order to receive the green colour-code assessment.

Survey 2 – November 2020: to measure progress against the following aspects:

- **[ADAPT] Analysis Complete:** has the analysis of the technical changes to be implemented (e.g. new messaging formats and adaptations required to internal IT systems) been completed and documented accordingly? If not, the entity will be considered behind schedule.
- **[ADAPT] Internal Adaptation Started:** has internal development started? If not, the entity will be considered behind schedule.

The entity should be on track on both aspects of the milestone in order to receive the green colour-code assessment.

Survey 3 – May 2021: to measure progress against the following aspects:

- **[COMMUNICATE] Detailed User Communication:** has detailed communication started about (i) upcoming changes in business processes, (ii) messaging formats (in the case of new messages based on non-registered latest drafts by SWIFT), and (iii) planned testing activities been provided to users? If not, the entity will be considered behind schedule.

- **[ADAPT] Internal Adaptation in Progress:** is adaptation of internal IT systems/procedures underway? If not, the entity will be considered behind schedule.
- **[TEST] Internal Testing Started:** has testing of changes implemented in internal IT systems started? If not, the entity will be considered behind schedule.

The entity should be on track on both aspects of the milestone in order to receive the green colour-code assessment.

Survey 4 – November 2021: to measure progress against the following aspects:

- **[ADAPT] Adaptation Complete:** have internal adaptations been completed (i.e. adaptation of IT systems, procedures, legal changes and internal testing)? If not, the entity will be considered behind schedule.
- **[TEST] User Testing Started:** has user testing started? If not, the entity will be considered behind schedule.

The entity should be on track on both aspects of the milestone in order to receive the green colour-code assessment.

Survey 5 – May 2022: to measure progress against the following aspects:

- **[TEST] User Testing in Progress:** is testing with users in progress? If not, the entity will be considered behind schedule.
- **[COMMUNICATE] Final User Communication:** has final communication to users taken place (i.e. updated user guide to reflect the changes implemented, final message usage guidelines for A2A communication)? If not, the entity will be considered behind schedule.

The entity should be on track on both aspects of the milestone in order to receive the green colour-code assessment.

Survey 6 – November 2022: to measure progress against the following aspects:

- **Standards Implemented:** have the Standards been implemented (with finalisation of testing)? If not, the entity will be assigned the red-colour code status.

The entity should have fully implemented the Standards in order to receive the **blue** colour-code assessment.

Figure 7
AMI-SeCo meeting schedule

The reporting on implementation progress will be submitted to the following AMI-SeCo meetings (where possible)



Annex 1: Sample Adaptation Plan template

Adaptation Plans should be developed to demonstrate a clear roadmap for migration towards the AMI-SeCo Standards. There should be separate plans for triparty collateral management, corporate actions, billing processes and remaining AMI-SeCo Standards. Each Plan should follow the sample template below. The template will be circulated for the CMH-TF secretariat to fill out once this document has been approved by the AMI-SeCo.

Table A.1
Example of Adaptation Plan template

AMI-SeCo Standards – Adaptation Plan								
ACTIVITY	Corporate Actions	Feasibility assessment			Implementation milestones			
		Adaptation required?	Description of changes required?	Legal barrier identified?	Internal adaptation	User communication	User testing	Standard implemented
No	STANDARD							
Standard 1	Harmonised business processes and workflows for corporate actions							
Standard 2	Provision of data necessary for calculating proceeds							
Standard 3	Consistency of information provided by issuer (I)CSDs, investor (I)CSDs and custodians							
Standard 4	Rounding rules							
Standard 5	Negative cash flows							
Standard 6	Business day rule							
Standard 7	Securities amount data							
Standard 8	Payment time							
Standard 9	Notification of processing status							
Standard 10	Blocking of securities							
Standard 11	Availability of default options							
Standard 12	Handling of fees for meeting-related corporate actions events							
Standard 13	Reversal of a corporate action							
Standard 14	Processing of foreign currency payments							
Standard 15	ISO 20022 messages for corporate actions							

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For specific terminology please refer to the [ECB glossary](#) (available in English only).

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