

SCoREBOARD

Corporate Actions – H1 2022

Spanish NSG

Background

Since publication of the Collateral Management Harmonisation Report in December 2017, the Advisory Group on Market Infrastructures for Securities and Collateral (AMI-SeCo) has made a number of significant breakthroughs in its ambition to create a Single Collateral Management Rulebook for Europe (SCoRE).

What is SCoRE?

SCoRE defines common rules for managing collateral in Europe. These rules will replace the fragmented legacy standards, structural constraints and complex and diverse market practices that exist across Europe today. Implementation of SCoRE should remove operational impediments to the availability, usage and mobility of collateral. Market participants in AMI-SeCo have committed to implementing the SCoRE Rulebook, with the first set of rules due to be implemented by November 2023. Their implementation efforts are regularly monitored by AMI-SeCo which facilitates an active dialogue with market participants on issues related to the clearing and settlement of securities and to collateral management.

National stakeholder groups (NSGs) are coordination forums to support the implementation of the Single Collateral Management Rulebook for Europe.

The Single Collateral Management Rulebook for Europe (SCoRE) contains 15 Standards related to the processing of corporate actions (published as the [SCoRE Standards for Corporate Actions](#)). Implementation progress is monitored twice per year.

Introduction

This summary report presents the results of the H2 2021 monitoring exercise conducted by the Spanish NSG with the involvement among the following stakeholders:

- 1 CSD – Iberclear
- 13 Custodians
- 2 Issuers

The report focuses on the milestones to be met by the time the survey closed. In this monitoring exercise, participants were expected to have achieved all the milestones up to Milestone 6 inclusive as described in section 3 below.

Section 1 presents the key takeaways per entity type i.e. CSD, TPA, Custodian etc. Section 2 depicts for each entity type their compliance status with the standards. Section 3 focuses on the progress against the individual milestones and Section 4 provides concluding remarks.

1 Key takeaways

The implementation of the Corporate Action Standards has already started and it has been included in most of the adaptation plans of the AMI-SeCo España entities

The majority of the entities participating in the Spanish AMI-SeCo NSG reported their progress under the monitoring framework. The implementation of the Corporate Action Standards has already started and it has been included in most of the adaptation plans of the NSG entities. The results of the survey in H1 2022 shows that an average 25 percent of the standards are already implemented. For most of the remaining standards, the work already started, and the standards are either under implementation or under analysis.

Figure 1
Summary of the monitoring exercise

SCORE SMALL CREDITORS MANAGEMENT REFERENCE FOR EUROPE	 Response Rate	 Implementation Status of the standards	Are all milestones 1 to 6 inclusive achieved?	Will the last milestone 13 be implemented on time (i.e. by 20 November 2023) ?
Custodians	85%	Implemented 27.9% Analysis started 30.2% Implementation started 14.1% Analysis not started 4.48%	38%	69%
Issuers	100%	Aware of obligations 57.3% Not aware of obligations 38.2%	n/a	n/a
CSD - Iberclear	100%	Implemented 25.2% Analysis started 0% Implementation started 58.6% Analysis not started 1.30%	No	Yes

CSD – Iberclear

CSD – Iberclear commits itself to comply with AMI-SeCo Standards for Corporate Actions on time.

Iberclear confirms the plan to implement Corporate Action standards according to the AMI-SeCo agenda. The CSD is committed and over 25 % of the standards are already implemented. The SCoREBOARD for Iberclear reflects a huge progress on implementation and development with 10 and 22 standards in each respective category status. For the remaining two standards, with yellow status, Iberclear is advancing in the ongoing analysis. Overall, the CSD confirms good progress to meet all the milestones.

Custodians

Most Spanish AMI-SeCo NSG custodians confirm their commitment to fulfil AMI-SeCo Corporate Actions Standards

All the Spanish AMI-SeCo NSG custodians are included under the monitoring framework. The 70% of the Spanish custodians submitted a reply to the H1 2022 Corporate Actions Standards questionnaires. The high response rate confirms the commitment of the Spanish community with the AMI-SeCo agenda. Compliance with the standards is reflected with approximately 42% of the questions on the standards answered as already implemented or under implementation. In relation to the remaining standards, 30% of the answers indicate that analysis has already started. With reference to the milestones, 1 and 2 have been achieved by at least 50% of the custodians and, although there have been a slight decrease in accomplishing intermediate milestones, the majority of the participants in the Spanish community confirm their expectations to meet all future milestones according to the plan agreed in the AMI-SeCo group.

Issuers

Issuers in the Spanish market confirm awareness and commitment with the AMI-SeCo agenda

The involvement among the issuers in the monitoring exercise is maintained at a maximum level, with representation of a broad range of issuers. Issuers represented through the Spanish Issuers Association and the Debt Management Office have reported along the subsequent monitoring surveys a high degree of awareness of AMI-SeCo standards and their implications.

Banco de España is on track to adopt the SCoRE Standards for Corporate Actions

NCB

Banco de España is on track to implement the SCoRE Standards for Corporate Actions for its collateral management activities by November 2023.

2 Compliance level with the standards

This section provides an overview of the current status of compliance with the corporate actions standards. CSDs and TPAs are monitored on an individual basis and are assigned a colour-code status in accordance with the methodology outlined in figure 2 below. Custodians and Issuers are too many to represent individually. Thus the replies of custodians and issuers from the AMI-SeCo community participating in the monitoring are presented on an aggregated basis per market and assigned a percentage representing their compliance status.

Figure 2
Standards implementation status as defined in the AMI-SeCo framework document



- 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

Table 1

Compliance level with the standards by each entity type

STANDARD	Custodians	Issuers	CSD - Iberclear
1A: Notification	54%	50%	G
1B: Instruction	57%		G
1C: Advise	45%		G
1D: Confirmation	44%		G
1E: Reversal	37%		G
1F: Meeting Notification	42%	0%	G
1G: Meeting Instruction	42%		G
1H: Meeting Results	37%		Y
2: Calculation of Proceeds	46%	50%	G
3: Consistency of Information	49%	50%	G
4: Rounding Rule 1	50%	100%	B
4: Rounding Rule 2	50%	50%	G
4: Rounding Rule 3	62%	100%	G
4: Rounding Rule 4	50%	50%	G
4: Rounding Rule 5	67%	100%	B
5: Negative Cash Flows	30%	100%	B
6: Business Day Rule		50%	G
7: Securities Amount Data Rule 1		100%	B
7: Securities Amount Data Rule 2		100%	B
7: Securities Amount Data Rule 3		100%	B
7: Securities Amount Data Rule 4		100%	N/A
8: Payment Time Rule 1		100%	G
8: Payment Time Rule 2		0%	N/A
8: Payment Time Rule 3		25%	G
8: Payment Time General Principle 3		100%	B
9: Processing Status	42%	50%	G
10: Blocking Rule 1	42%		B
10: Blocking Rule 2	10%		B
10: Blocking Rule 3	0%		G
10: Blocking Rule 4	17%		G
10: Blocking Rule 5	9%		G
11: Default Option	58%	100%	B
12: Handling of Fees	42%		Y
13: Reversal	25%	0%	G
14: Foreign Currency			G
15: ISO 20022 Messaging	21%		G

Notes:

- For CSDs and TPAs the colour-code reflects the current implementation status of each Standard in accordance with the methodology outlined in figure 2 above.
- TPAs are using custody services provided by CSDs or Custodians in order to disseminate CA information to Collateral Givers and Collateral Takers. Monitoring of TPAs thus focuses on the implementation of triparty specific workflows described in Standard 1.
- For custodians, the percentage of custodians which have implemented standards / standards being under development and implementation.
- Issuers were asked to confirm awareness of their obligation to provide all relevant information to the Issuer CSD (on a Yes/No basis). The % reflects the number of issuers who responded yes to the survey
- Percentages are calculated on the basis of expected respondents, i.e. number of entities monitored in the market.

3 Progress towards the milestones

This section tracks market stakeholders progress in implementing the Standards against the 13 set milestones identified by AMI-SeCo.

The milestones facilitate consistent implementation across markets (given the long-term efforts that are needed) and avoids issues remaining undetected until the deadline of 20 November 2023 to achieve compliance and implementation of the standards.

Table 2
Milestones identified by AMI-SeCo

Milestone	Description	Date
M1	Analysis Started: Have you commenced an in-depth analysis of all applicable SCoRE Standards in order to identify and document all the changes required to internal processes and procedures in order to comply with the SCoRE Standards?	30/06/2020
M2	Initial Communication: Has initial high-level communication with external stakeholders on the changes introduced by SCoRE commenced?	01/03/2021
M3	Analysis Completed: Have you completed an in-depth analysis of all applicable SCoRE Standards?	31/07/2021
M4	Documentation Completed: Have you documented all the internal processes and procedures which need to be adapted in order to comply with the SCoRE Standards?	31/12/2021
M5	Detailed External Communication: Has detailed communication started regarding (i) upcoming changes in business processes, (ii) messaging formats and usage guidelines (in the case of new messages based on non-registered latest drafts by SWIFT) and (iii) planned testing activities been provided to users?	31/12/2021
M6	SCoRE Adaptation Started: Have you started to adapt/develop the processes and procedures in order to comply with the SCoRE Standards?	01/01/2022
M7	SCoRE Adaptation Complete: Have you completed the necessary adaptations/developments for the processes and procedures in order to comply with the SCoRE Standards?	30/06/2022
M8	Internal Testing Started for SCoRE: Have you started to test the changes to your internal processes and procedures which have been introduced in order to comply with the SCoRE Standards?	01/07/2022
M9	Internal Testing Complete for SCoRE: Have you completed the necessary internal testing?	02/12/2022
M10	External Testing Started for SCoRE: Are you in a position to test the changes introduced in order to comply with the SCoRE Standards with your user community (i.e. CSD participants / Collateral Givers and Collateral Takers in the context of the Standards applicable to TPAs)?	20/03/2023
M11	Final External Communication on SCoRE: has final communication to users been provided (i.e. updated user guide to reflect the changes implemented, final message usage guidelines for A2A communication) related to the SCoRE Standards?	01/04/2023
M12	External Testing Completed for SCoRE: Is the testing of the changes introduced in order to comply with the SCoRE Standards with your user community completed (i.e. CSD participants / Collateral Givers and Collateral Takers in the context of the Standards applicable to TPAs)?	13/10/2023
M13	SCoRE Standards Implemented: have the SCoRE Standards been implemented?	20/11/2023

The current H1 2022 monitoring exercise focuses on milestones 1 to 6 given that Milestone 6 (with a deadline of 1 January 2022) was meant to have been achieved by the time the survey closed.

In each survey round, all the entities are asked to confirm (on a yes/no basis) whether the milestones will be met by the set milestones dates. If it is not the case, they are also asked the expected date for when the milestone will be reached.

For the milestones which had to be achieved by the time the survey closed: the blue colour code is assigned to those milestones that have been successfully achieved. Milestones that will only be achieved later than their set deadline are assigned a yellow status with indication of the likely date of achievement.

For the milestones that are only due to be achieved after the current reporting cycle: the green colour code indicates that the entity anticipates achieving that future milestone on time. A yellow status indicates that the milestone is foreseen to be met later than the set milestone date. In this case, the date of achievement anticipated is also indicated in the table.

Table 3

Entities' expectation of achieving the milestones at the set dates

	Custodians	CSD - Iberclear
Milestone 1 June 2020	54%	Yes
Milestone 2 March 2021	62%	Yes
Milestone 3 July 2021	31%	Yes
Milestone 4 December 2021	23%	Yes
Milestone 5 December 2021	31%	05/22
Milestone 6 January 2022	31%	Yes
Milestone 7 June 2022	23%	12/22
Milestone 8 July 2022	23%	09/22
Milestone 9 December 2022	23%	03/23
Milestone 10 March 2023	46%	Yes
Milestone 11 April 2023	54%	Yes
Milestone 12 October 2023	62%	Yes
Milestone 13 November 2023	69%	Yes

4 Concluding remarks

The CSD Iberclear confirms, with green status, the expectation to meet on time all final milestones according to the AMI-SeCo agenda. Fulfilment of intermediate milestones to be due in 2022 experienced a slight delay, but with no impact on neither the standards implementation nor on the remaining milestones. Custodians in the Spanish market also report a high degree of confidence in achieving all the milestones.

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Postal address 60640 Frankfurt am Main, Germany

Telephone +49 69 1344 0

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