

Corporate Actions Adaptation Plan

Clearstream Banking Luxembourg

Activity	Corporate Actions
Plan submitted by	Clearstream Banking Luxembourg
NSG	Luxembourg
Date	March 2022

Background

The Adaptation Plan provides information on the changes which will be implemented to meet the SCoRE Standards for Corporate Actions which form part of the Single Collateral Management Rulebook for Europe (SCoRE). Full details of the Corporate Actions Standards can be found on the ECB website.

The document is structured as follows: Section 1 (Cover Letter) provides a high-level summary of the changes in order to implement the SCoRE Standards. Section 2 (Adaptation Plan Table) then provides a more detailed overview per Standard covering a feasibility assessment and the implementation milestones.

1 Cover Letter

Clearstream Banking Luxembourg continues to fully support the introduction of SCoRE collateral management harmonisation standards endorsed by AMI-SeCo. This support is reflected by active participation in the design of the new Corporate Actions standards and Asset Services Expert Group of the Collateral Management Harmonisation Task Force, and by the commitment to target implementation of these standards and migration to the Eurosystem's ECMS platform according to the current published Go-Live timeline of November 2023. The resulting changes will impact TPA and (I)CSD operations for all market actors in Luxembourg, Germany and the ICSD, however Clearstream Banking Luxembourg will seek to limit impact to clients as far as possible.

Clearstream Banking Luxembourg is already largely compliant with 4 out of the 15 standards (this has reduced from 7 since the changes approved in December 2021) and work is now focusing on the implementation of the remaining changes. For the remaining standards, which were agreed*1 within the December 2021 AMI-SeCo meeting, Clearstream Banking Luxembourg is now completing internal impact analysis and finalising business requirements. More

¹ Agreement of Corporate Actions Standards was largely reached during the December 2021 AMI-SeCo meeting. Some work on details of certain standards remained outstanding

information regarding specific impacts to clients will be given during the course of Q2 2021, once this exercise is complete.

The below analysis of corporate action standards covers Clearstream Banking Luxembourg activity in its role as the Issuer CSD for Eurobonds. The impacts on the Investor CSD model will be analysed based on the adaptation plans submitted by other CSDs and are not included in this report.

Analysis of corporate action standards regarding Clearstream Banking Luxembourg activity in its role as Triparty Agent are also covered in this report. Please note however that for Triparty Collateral Management transactions, positions will normally be substituted by Clearstream Banking Luxembourg in all cases except non-taxable coupon payments. Any proceeds which are credited to collateral accounts will be subject to a retrocession payment processes. In any case, all processing of corporate action events for TPA positions will be performed by Clearstream Banking Luxembourg as ICSD, according to the standards.

Please note that as technical implementation details within the standards are still under final analysis, all details, including all dates in this report are indicative based on current information, and cannot therefore be considered final. This may be refined once full impacts and requirements are known. Full details are given in the text below.

Despite the change to the time of application of the standards to non-debt instruments, Clearstream Banking Luxembourg intends to implement the Corporate Actions standards for all securities types in November 2023.

We encourage all Clearstream customers, particularly ECMS participants, to review the standards described herein, in order to familiarise themselves with potential changes in relation to corporate actions impacting processing, validation, and/or calculation methods.

Feasibility Assessment/Legal barriers:

Clearstream Banking Luxembourg already complies with 4 of the 15 Standards. However, the implementation of some standards requires the adaptation of existing reporting to include new data elements and fields outlined in the key data elements requirements, as well as implementation of the new ISO20022 formats. Clearstream Banking Luxembourg would also need to develop new reporting as required by the standards (e.g. Corporate action event processing status advice).

Both ISO 15022 and ISO 20022 formats will be supported during the transition period. Exact procedures for the support of both ISO standards are not yet finalised as ISO 20022 introduces new messages that do not exist in ISO 15022. Specific mapping (where possible), validation and processing of the messages in both versions will be required. More information will follow in due course.

The developments for SRD II have been leveraged to cover the requirements for some messages and flows, especially for meeting events.

Clearstream Banking Luxembourg readiness and compliance have an external dependency on Issuers/Agents for Issuer CSD business and on Issuers CSDs/Agents for Investor CSD business.

Our initial analysis of the requirements has identified no critical legal barriers so far, although some minor aspects remain under investigation. However, we will only be able to confirm that after the finalisation of the ECMS requirements and a subsequent analysis of the impacts has taken place.

Milestones:

Clearstream Banking Luxembourg is currently finalising internal business requirements and analysies their impacts in detail. Clearstream Banking Luxembourg has previously raised concerns regarding the late conclusion of standards drafting and the potential consequences, which are now materialising. Owing to the late stabilisation of the standards, which were only finally agreed in the December 2021 AMI-SeCo meeting, aspects of downstream processing of these requirements are now delayed and the implementation dates described below remain indicative.

In particular, the following milestones are delayed:

M5 – External Communication (31/12/2021) – we now intend to provide detailed information to clients as soon as possible during the course of Q2 2022

M7 – Adaptation Complete (30/06/2022) – our current plan is to complete adaptations by the end of 2022 although this is still dependent final impact analysis

M8 – Internal Testing Started (01/07/2022) – start of internal testing will be delayed owing to the additional time required to complete adaptations (M7). We now anticipate starting internal testing at the beginning of 2023

M9 – Internal Testing Completed (02/12/2022) – completion of internal testing will be delayed owing to the delay to the start of internal testing (M8).

M10 – External Testing Started (05/12/2022) – owing to late completion of internal testing, it may now not be possible to start external testing until May 2023.

Despite these interim milestone delays, Clearstream Banking Luxembourg currently remains confident that compliance with the standards, together with the implementation of ECMS, will be achieved on time in November 2023.

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

2 Adaptation Plan Table

		AMI-SeCo Standard		Feasibility Ass	essment	Implementation Milestone	s		
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of th	e follo	wing activities:	
	Harmonised	The Business Processes &				Analysis and Communication	Yes	No	n/a
	business process and workflows per	Workflows and Key Data Elements are described in the following				M1: Analysis started by 30/06/2020		□ DD-MM-YYYY	
	CA event	sections of the AMI-SeCo Corporate Action Standards				M2: Initial communication by 01/03/2021		□ DD-MM-YYYY	
		document. Please refer to				M3: Analysis completed by 31/07/2021		□ DD-MM-YYYY	
		Standards 1A to 1H below:				M4: Documentation completed by 31/12/2021		□ DD-MM-YYYY	
						M5: Detailed external communication by 31/12/2021		⊠ 31/05/2022	
						Internal Adaptation	Yes	No	n/a
4						M6: Adaptation started by 01/01/2022		□ DD-MM-YYYY	
1						M7: Adaptation completed by 30/06/2022		⊠ 31/12/2022	
						M8: Internal testing started by 01/07/2022		⊠ 16/01/2023	
						M9: Internal testing complete by 02/12/2022		⊠ 28/04/2023	
						Testing and Implementation	Yes	No	n/a
						M10: External testing started by 05/12/2022		⊠ 01/05/2023	
						M11: Final external communication by 01/04/2023		□ DD-MM-YYYY	
						M12: External testing completed by 13/10/2023		□ DD-MM-YYYY	
						M13: Standard implemented by 20/11/2023		□ DD-MM-YYYY	
1A	Corporate Action Notification	The Account Servicer must notify the Account Owner about the details of a corporate action event in accordance with a set of harmonised business processes, workflows and key data elements.							
	Business Processes & Workflows	Key Data Elements							
ation	1a. Notify [ca.1.01]	Table 3	Adaptation Required	Update some key data elements. No change of the	None identified so far				
Additional Information	1b. Update [ca.1.02]	Table 3	Adaptation Required	notification rules in terms of sending unconfirmed information.					
Addition	1c. Cancel [ca.1.03]	Table 4	Adaptation Required	Reporting of "Withdrawal" as a cancellation reason (i/o					

				standalone message) as		
				per standards		
1B	Corporate Action Instruction	Instructions on elective corporate actions must be processed in accordance with a set of harmonised business processes, workflows and key data elements.				
	Business Processes & Workflows	Key Data Elements				
	2a. Instruction [ca.2.01]	Table 5	Adaptation Required	Send the Instruction Status Advice for		
	2b. Instruction Status Advice [ca.2.02]	Table 6	Adaptation Required	uninstructed default options as per standard. Update some key data		
ormation	2c. Instruction Cancellation Request [ca.2.03]	Table 7	Adaptation Required	elements	None identified so far	
Additional Information	2d. Instruction Cancellation Request Status Advice [ca.2.04]	Table 8	Adaptation Required	For TPA positions: This business process and workflow is not applied to the collateral account, but to the source account.		
1C	Corporate Action Advice	The Account Servicer must be able to provide Preliminary Advice notifications in accordance with a set of harmonised business processes, workflows and key data elements.				
	Business Processes & Workflows	Key Data Elements				
formation	3a. Movement Preliminary Advice [ca.3.01]	Table 9	Adaptation Required	Update some key data elements. Advice to be sent at RD end of day	None identified	
Additional Information	3b. Movement Preliminary Advice Cancellation [ca.3.02]	Table 10	Adaptation Required	Cancellation to be sent for ISO 20022 messages	so far	
1D	Confirmation	The Account Servicer must confirm that a corporate action has been carried out in accordance with a set of harmonised business processes, workflows and key data elements.				
Addit ional	Applicable Business	Key Data Elements				

	Processes & Workflows					
	4a. CA Event Processing Status Advice[ca.4.01]	Table 11	Adaptation Required	This reporting is not supported today and has to be implemented. Define business flows External dependency on Issuers/Agents Open issue remains regarding which specific event types this applies to.	None identified so far	
	4b. Movement Confirmation [ca.4.02]	Table 12	Adaptation Required	Update some key data elements.		
1E	Corporate Action Reversal	The Account Servicer must carry out the reversal of a corporate action in accordance with a set of harmonised business processes, workflows and key data elements.				
uo	Applicable Business Processes & Workflows	Key Data Elements				
Additional Information	5a. Movement Preliminary Advice [ca.5.01]	Table 13	Adaptation Required	Update some key data elements External dependency on Issuers/Agents	None identified so far	
Addition	5b. Movement Reversal Advice [ca.5.02]	Table 14	Adaptation Required	Update some key data elements	None identified so far	
1F	Meeting Event Notifications	The Account Servicer must notify the Account Owner about the details of a meeting event in accordance with a set of harmonised business processes, workflows and key data elements.				
	Business Processes & Workflows	Key Data Elements				
Information	1a. Meeting Notification [me.1.01]	Table 15	TBC	Subject to further assessment and dependent on deliverables of SRD II		Subject to further assessment and dependent on deliverables of SRD II project changing the existing General Meetings service.
onal Infor	1b. Meeting Cancellation [me.1.02]	Table 16	TBC	project changing the existing General Meetings service.	None identified so far	Subject to further assessment and dependent on deliverables of SRD II project changing the existing General Meetings service.
Additional	1c. Meeting Entitlement	Table 17	TBC	Subject to further assessment and		Subject to further assessment and dependent on deliverables of SRD II project changing the existing General Meetings service.

	Notification [me.1.03]			dependent on deliverables of SRD II project changing the existing General Meetings service.		
1G	Meeting Event Instructions	The Account Owner (or the party holding the right to vote) must provide instructions on meeting events in accordance with a set of harmonised business processes, workflows and key data elements.				
	Business Processes & Workflows	Key Data Elements				
	2a. Meeting Instruction [me.2.01]	Table 18	TBC	Subject to further assessment and dependent on	None identified so far	Subject to further assessment and dependent on deliverables of SRD II project changing the existing General Meetings service.
uo	2b. Meeting Instruction Cancellation Request [me.2.02]	Table 20	TBC			Subject to further assessment and dependent on deliverables of SRD II project changing the existing General Meetings service.
Information	2c. Meeting Instruction Status [me.2.03]	Table 19	TBC	deliverables of SRD II project changing the existing General Meetings service.		Subject to further assessment and dependent on deliverables of SRD II project changing the existing General Meetings service.
Additional	2d. Meeting Vote Execution Confirmation [me.2.04]	Table 21	TBC			Subject to further assessment and dependent on deliverables of SRD II project changing the existing General Meetings service.
1H	Meeting Event Results	The Account Servicer must disseminate meeting results in accordance with a set of harmonised business processes, workflows and key data elements.				
	Business Processes & Workflows	Key Data Elements				
Additional						

	3a. Meeting Result Dissemination [me.3.01]	Table 22	TBC	Subject to further assessment and dependent on deliverables of SRD II project changing the existing General Meetings service.	None identified so far	Subject to further assessment and dependent on delivera changing the existing General Meetings service.	ables o	f SRD II project	
	Provision of data	The corporate action notification,				Analysis and Communication	Yes	No	n/a
	necessary for calculation of	as communicated by the Account Servicer, must include the				M1: Analysis started by 30/06/2020		□ DD-MM-YYYY	
	proceeds	necessary data elements required to calculate the cash and / or				M2: Initial communication by 01/03/2021		□ DD-MM-YYYY	
		securities movements.				M3: Analysis completed by 31/07/2021		□ DD-MM-YYYY	
						M4: Documentation completed by 31/12/2021		□ DD-MM-YYYY	
						M5: Detailed external communication by 31/12/2021		⊠ 31/05/2022	
						Internal Adaptation	Yes	No	n/a
						M6: Adaptation started by 01/01/2022		□ DD-MM-YYYY	
2						M7: Adaptation completed by 30/06/2022		⊠ 31/12/2022	
						M8: Internal testing started by 01/07/2022		⊠ 16/01/2023	
						M9: Internal testing complete by 02/12/2022		⊠ 28/04/2023	
						Testing and Implementation	Yes	No	n/a
						M10: External testing started by 05/12/2022		⊠ 01/05/2023	
						M11: Final external communication by 01/04/2023		☐ DD-MM-YYYY	
						M12: External testing completed by 13/10/2023		☐ DD-MM-YYYY	
						M13: Standard implemented by 20/11/2023		□ DD-MM-YYYY	
						Please explain if the milestones are different for events re (and if yes, explain in the additional Milestones table).	elated	to non-debt instrume	ents
	Events relevant to	debt instruments							
	Event ID	Event Name							
	1. ACTV	Trading Status: Active	N/A	Informative Event					
		Repurchase Offer / Issuer Bid / Reverse Rights	Implemented						
	3. BMET	Bond Holder Meeting	Implemented		None identified so far				
	4. BPUT	Put Redemption	Implemented		50 Iai				
	5. BRUP	Bankruptcy	N/A	Informative Event					
	6. CAPI	Capitalisation	Implemented						

				-	
7. CERT	Non-US TEFRA D Certification	Implemented			
8. CHAN	Change	Implemented			
9. CMET	Court Meeting	Implemented			
10. CONS	Consent	Implemented			
11. CREV	Credit Event	N/A	Informative Event		
12. DFLT	Bond Default	N/A	Informative Event		
13. DLST	Trading Status: Delisted	N/A	Informative Event		
14. DRAW	Drawing	Implemented			
15. DSCL	Disclosure	Partially Implemented	See Standard 3		
16. DTCH	Dutch Auction	Implemented			
17. EXOF	Exchange	Implemented			
18. EXTM	Maturity Extension	Implemented			
19. INCR	Increase in Value	Partially Implemented	See Standard 3		
20. INFO	Information	N/A	Informative Event	None identified	
21 . INTR	Interest Payment	Implemented		so far	
22 . LIQU	Liquidation Payment	Partially Implemented	See Standard 3		
23. MCAL	Full Call / Early Redemption	Implemented			
24. OTHR	Other Event	N/A	Informative Event		
25. PARI	Pari-Passu	Implemented			
26. PCAL	Partial Redemption Without Pool Factor Reduction	Implemented			
27 . PINK	Payment in Kind	Partially Implemented	See Standard 3		
28. PLAC	Place of Incorporation	Partially Implemented	See Standard 3		
29 . PPMT	Instalment Call	Partially Implemented	See Standard 3		
30. PRED	Partial Redemption With Pool Factor Reduction	Implemented			
31. REDM	Final Maturity	Adaptation Required	See Standard 3		
32. REDO	Redenomination	N/A	See Standard 3	None identified so far	
33. REMK	Remarketing Agreement	Implemented			
34. RHDI	Intermediate Securities Distribution	Implemented			
35. SUSP	Trading Status: Suspended	N/A	Informative Event		
				-	

36 . 7	TEND	Tender / Acquisition / Takeover / Purchase Offer	Adaptation Required	See Standard 3				
37. 7	TREC	Tax Reclaim	Adaptation Required	See Standard 3				
38. V	WRTH	Worthless	Implemented					
39. V	WTRC	Withholding Tax Relief Certification	Adaptation Required	See Standard 3				
Event	ts relevant	to non-debt instruments			Analysis and Communication	Yes	No	ı
					M1: Analysis started by 30/06/2020		□ DD-MM-YYYY	
					M2: Initial communication by 01/03/2021		□ DD-MM-YYYY	[
					M3: Analysis completed by 31/07/2021		□ DD-MM-YYYY	[
					M4: Documentation completed by 31/12/2021		□ DD-MM-YYYY	[
					M5: Detailed external communication by 31/12/2021		⊠ 31/05/2022	
					Internal Adaptation	Yes	No	n
					M6: Adaptation started by 01/01/2022		□ DD-MM-YYYY	
					M7: Adaptation completed by 30/06/2022		⊠ 31/12/2022	
					M8: Internal testing started by 01/07/2022		⊠ 16/01/2023	
					M9: Internal testing complete by 02/12/2022		⊠ 28/04/2023	[
					Testing and Implementation	Yes	No	r
					M10: External testing started by 05/12/2022		⊠ 01/05/2023	
					M11: Final external communication by 01/04/2023		□ DD-MM-YYYY	
					M12: External testing completed by 13/10/2023		□ DD-MM-YYYY	
					M13: Standard implemented by 20/11/2023		□ DD-MM-YYYY	
1. /	ACCU	Accumulation	Implemented					
2 . E	BONU	Bonus Issue/Capitalisation Issue	Partially Implemented	See Standard 3				
	BONU	Bonus Issue/Capitalisation Issue Capital Distribution		See Standard 3 See Standard 3				
3. (Implemented Partially					
3 . (CAPD	Capital Distribution	Implemented Partially Implemented Partially	See Standard 3				
3. (d. (d. (d. (d. (d. (d. (d. (d. (d. (d	CAPD	Capital Distribution Capital Gains Distribution	Implemented Partially Implemented Partially Implemented Adaptation	See Standard 3 See Standard 3				
3. (4. (5. (6. [CAPD CAPG CONV	Capital Distribution Capital Gains Distribution Conversion	Implemented Partially Implemented Partially Implemented Adaptation Required Partially	See Standard 3 See Standard 3 See Standard 3				
3. (4. (5. (6. [CAPD CAPG CONV DECR	Capital Distribution Capital Gains Distribution Conversion Decrease In Value Cash Distribution From Non-Eligible	Implemented Partially Implemented Partially Implemented Adaptation Required Partially Implemented	See Standard 3 See Standard 3 See Standard 3				
3. (4. (5. (6. E	CAPD CAPG CONV DECR DRCA	Capital Distribution Capital Gains Distribution Conversion Decrease In Value Cash Distribution From Non-Eligible Securities Sales	Implemented Partially Implemented Partially Implemented Adaptation Required Partially Implemented Implemented	See Standard 3 See Standard 3 See Standard 3				

	11. DVSC	Scrip Dividend	N/A	See Standard 3				
	12. DVSE	Stock Dividend	Implemented					
	13. EXRI	Call on Intermediate Securities	Implemented					
	14. EXWA	Warrant Exercise	Implemented					
	15. GMET	General Meeting	Implemented					
	16. MRGR	Merger	Implemented					
	17. ODLT	Odd Lot Sale/Purchase	Implemented					
	18. PRIO	Priority Issue	Implemented					
	19. SHPR	Shares Premium Dividend	Implemented					
	20. SOFF	Spin-Off	Implemented					
	21. SPLF	Stock Split/Change in Nominal Value/Subdivision	Implemented					
	22. SPLR	Reverse Stock Split/Change in Nominal Value	Implemented					
	23. XMET	Extraordinary Meeting	Implemented					
	Consistency of	Investor (I)CSDs and Custodians			Analysis and Communication	Yes	No	n/a
	provided by meeting event inform Investor CSDs & Issuer (I)C Custodians event type	must remit information on CA and meeting events in accordance with			M1: Analysis started by 30/06/2020		□ DD-MM-YYYY	
		the information received from the Issuer (I)CSD. All CA and meeting			M2: Initial communication by 01/03/2021		□ DD-MM-YYYY	
		event types announced by the			M3: Analysis completed by 31/07/2021		□ DD-MM-YYYY	
		Issuer CSD must be supported by all Investor (I)CSDs / Custodians.			M4: Documentation completed by 31/12/2021		□ DD-MM-YYYY	
		All Issuer CSDs must use CA and meeting event types in a			M5: Detailed external communication by 31/12/2021		⊠ 31/05/2022	
		consistent manner.			Internal Adaptation	Yes	No	n/a
3					M6: Adaptation started by 01/01/2022		□ DD-MM-YYYY	
3				•	M7: Adaptation completed by 30/06/2022		⊠ 31/12/2022	
					M8: Internal testing started by 01/07/2022		⊠ 16/01/2023	
					M9: Internal testing complete by 02/12/2022		⊠ 28/04/2023	
					Testing and Implementation	Yes	No	n/a
					M10: External testing started by 05/12/2022		⊠ 01/05/2023	
					M11: Final external communication by 01/04/2023		□ DD-MM-YYYY	
					M12: External testing completed by 13/10/2023		☐ DD-MM-YYYY	
					M13: Standard implemented by 20/11/2023		□ DD-MM-YYYY	
	processed in a co accordance with t document, so that types both within	ion events listed in the table below shall be nsistent manner across Europe in he details specified in Section 4 of this there is consistency in the usage of event an individual CSD, and across different tents listed below are in the scope of the						

	e indicate for each CA event whether required in order to adhere to the Standard.				
Events relevan	t to debt instruments				
Event ID	Event Name				
1. ACTV	Trading Status: Active	Implemented			
2. BIDS	Repurchase Offer / Issuer Bid / Reverse Rights	Implemented			
3. BMET	Bond Holder Meeting	Implemented			
4. BPUT	Put Redemption	Implemented			
5. BRUP	Bankruptcy	Implemented			
6. CAPI	Capitalisation	Implemented			
7. CERT	Non-US TEFRA D Certification	Implemented			
8. CHAN	Change	Implemented			
9. CMET	Court Meeting	Implemented			
10. CONS	Consent	Implemented			
11. CREV	Credit Event	Implemented		None identified	
12. DFLT	Bond Default	Implemented		so far	
13. DLST	Trading Status: Delisted	Implemented			
14. DRAW	Drawing	Implemented			
15. DSCL	Disclosure	Partially Implemented	DSCL/MAND/CONY sent as informative template		
16. DTCH	Dutch Auction	Implemented			
17. EXOF	Exchange	Implemented			
18. EXTM	Maturity Extension	Implemented			
19. INCR	Increase in Value	Partially Implemented	INCR/MAND/SECU will be processed as CHAN or BONU		
20 . INFO	Information	Implemented			
21. INTR	Interest Payment	Implemented			
22. LIQU	Liquidation Payment	Partially Implemented	LIQU/CHOS will be processed as DVCA or DVOP		
23. MCAL	Full Call / Early Redemption	Implemented		None identified so far	
24. OTHR	Other Event	Implemented		SU IAI	
25 . PARI	Pari-Passu	Implemented			
26. PCAL	Partial Redemption Without Pool Factor Reduction	Implemented			

27. PINK Payment in Kind	Partially Implemented	PINK/MAND/OTHR will be processed as PINK/MAND/SECU					
28. PLAC Place of Incorporation	Partially Implemented	PLAC/MAND/SECU will be processed as EXOF/MAND/SECU					
29. PPMT Instalment Call	Partially Implemented	PPMT/CHOS/LAPS will be processed as PPMT/MAND/SECU					
30. PRED Partial Redemption With Pool Factor Reduction	Implemented						
31. REDM Final Maturity	Adaptation Required	Adaptation required for REDM/CHOS					
32. REDO Redenomination	N/A	REDO/MAND/NA will be sent as an informative event and changes processed via settlement flows REDO/MAND/SECU will be processed as CHAN/MAND/SECU					
33. REMK Remarketing Agreement	Implemented						
34. RHDI Intermediate Securities Distribution	Implemented						
35. SUSP Trading Status: Suspended	Implemented						
36. TEND Tender / Acquisition / Takeover / Purchase Offer	Adaptation Required	Adaptation required for CASE option					
37. TREC Tax Reclaim	Adaptation Required						
38. WRTH Worthless	Implemented		None identified so far				
39. WTRC Withholding Tax Relief Certification	Adaptation Required	Adaptation required for BOBD Option					
Events relevant to non-debt instruments				Analysis and Communication	Yes	No	n/a
				M1: Analysis started by 30/06/2020		□ DD-MM-YYYY	
				M2: Initial communication by 01/03/2021		□ DD-MM-YYYY	
				M3: Analysis completed by 31/07/2021		□ DD-MM-YYYY	
				M4: Documentation completed by 31/12/2021		□ DD-MM-YYYY	
				M5: Detailed external communication by 31/12/2021		⊠ 31/05/2022	
				Internal Adaptation	Yes	No	n/a
				M6: Adaptation started by 01/01/2022		□ DD-MM-YYYY	
				M7: Adaptation completed by 30/06/2022		⊠ 31/12/2022	
				M8: Internal testing started by 01/07/2022		⊠ 16/01/2023	
				M9: Internal testing complete by 02/12/2022		⊠ 28/04/2023	

				Testing and Implementation	Yes	No	n/a
				M10: External testing started by 05/12/2022		⊠ 01/05/2023	
				M11: Final external communication by 01/04/2023		□ DD-MM-YYYY	
				M12: External testing completed by 13/10/2023		□ DD-MM-YYYY	
				M13: Standard implemented by 20/11/2023		□ DD-MM-YYYY	
1. ACCU	Accumulation	Implemented					
2. BONU	Bonus Issue/Capitalisation Issue	Partially Implemented	BONU/CHOS/LAPS will be processed as BONU/CHOS/CASH				
3. CAPD	Capital Distribution	Partially Implemented	CAPD/CHOS/CASH will be processed as DVCA/CHOS/CASH				
4. CAPG	Capital Gains Distribution	Partially Implemented	CAPG/CHOS/CASH will be processed as DVCA/CHOS/CASH				
5. CONV	Conversion	Adaptation Required	Adaptation required for CONV MAND				
6. DECR	Decrease In Value	Partially Implemented	DECR/MAND/SECU will be processed as SLPR/MAND/SECU DECR/CHOS/CASH will be processed as DVCA/CHOS/CASH				
7. DRCA	Cash Distribution From Non-Eligible Securities Sales	Implemented					
8. DRIP	Dividend Reinvestment	Implemented					
9. DVCA	Cash Dividend	Implemented					
10. DVOP	Dividend Option	Implemented					
11. DVSC	Scrip Dividend	N/A	DVSC will be processed as BONU or DVSE				
12. DVSE	Stock Dividend	Implemented					
13. EXRI	Call on Intermediate Securities	Implemented					
14. EXWA	Warrant Exercise	Implemented					
15. GMET	General Meeting	Implemented					
16. MRGR	Merger	Implemented					
17. ODLT	Odd Lot Sale/Purchase	Implemented					
18. PRIO	Priority Issue	Implemented					
19. SHPR	Shares Premium Dividend	Implemented					
20. SOFF	Spin-Off	Implemented					
21. SPLF	Stock Split/Change in Nominal Value/Subdivision	Implemented					

	22. SPLR	Reverse Stock Split/Change in Nominal Value	Implemented						
	23. XMET	Extraordinary Meeting	Implemented						
	Rounding rules	Harmonised rounding rules shall be applied for the calculation of				Analysis and Communication	Yes	No	n/a
		cash payments and securities				M1: Analysis started by 30/06/2020		□ DD-MM-YYYY	
		movements.				M2: Initial communication by 01/03/2021		□ DD-MM-YYYY	
						M3: Analysis completed by 31/07/2021		□ DD-MM-YYYY	
						M4: Documentation completed by 31/12/2021		□ DD-MM-YYYY	
						M5: Detailed external communication by 31/12/2021		⊠ 31/05/2022	
						Internal Adaptation	Yes	No	n/a
						M6: Adaptation started by 01/01/2022		□ DD-MM-YYYY	
4						M7: Adaptation completed by 30/06/2022		⊠ 31/12/2022	
						M8: Internal testing started by 01/07/2022		⊠ 16/01/2023	
						M9: Internal testing complete by 02/12/2022		⊠ 28/04/2023	
						Testing and Implementation	Yes	No	n/a
						M10: External testing started by 05/12/2022		⊠ 01/05/2023	
						M11: Final external communication by 01/04/2023		□ DD-MM-YYYY	
						M12: External testing completed by 13/10/2023		□ DD-MM-YYYY	
						M13: Standard implemented by 20/11/2023		□ DD-MM-YYYY	
	Rounding rule no 1	. For cash payments, the cash amount to be paid is to be rounded down to the number of decimals permissible in the payment currency (i.e. to 2 decimals in case of EUR payments). Accordingly, and as an example, a cash amount of EUR 2.556 should be rounded down to EUR 2.55	Adaptation Required	Update the rounding rules as per standard to apply round down.	None identified so far				
Additional Information	Rounding rule no 2	. For securities movements, the securities amount should be rounded down to the nearest full unit ² . The Minimum Settlement Unit (MSU) ³ of the security shall determine whether the nearest full unit is a whole number (for example 1) or another number ⁴ (for example 1.1).	Implemented	N/A	None identified so far				

² For equities, the rounding-down applies on (I)CSD level for the total position held for one (I)CSD participant and not per share. Accordingly, an entitlement to receive 9.33 shares would be rounded down to 9 i.e. the nearest whole number.

³ The MSU should be determined in accordance with the guidance contained in question 4.2 of the T2S Corporate Actions Standards FAQ. ⁴ Investment fund units may contain up to 6 decimals.

	Rounding rule no. 3	For the calculation of cash payment amounts or securities movement amounts relating to a specific securities account, the ratio applicable to the entire issue should be applied to the total holding in the parent ISIN on the securities account. (There should be no intermediate step whereby a ratio per 1,000 nominal is calculated, and then applied).	N/A	Processing will continue as today. CBL will not comply.	None identified so far				
-	Rounding rule no. 4	The ratio specified by the Issuer CSD in the event notification should be passed on in its entirety in the event notification sent by all Account Servicers and Custodians in the custody chain. (There should be no rounding up, or rounding down, or truncation, of the ratio).	N/A	As Issuer CSD specifies the ratio, no changes are planned to the current process, current truncation rules for income and CA will continue.	None identified so far				
	Negative cash	Issuer CSDs and Investor CSDs				Analysis and Communication	Yes	No	n/a
	flows	shall support the processing of corporate actions where the				M1: Analysis started by 30/06/2020		□ DD-MM-YYYY	
		underlying security has a fixed negative interest rate or a floating				M2: Initial communication by 01/03/2021		□ DD-MM-YYYY	
		rate coupon. Any negative interest				M3: Analysis completed by 31/07/2021		□ DD-MM-YYYY	
		shall result in a cashflow from the Investor to the Issuer which shall				M4: Documentation completed by 31/12/2021		□ DD-MM-YYYY	
		be processed using the Interest				M5: Detailed external communication by 31/12/2021		□ DD-MM-YYYY	
		Payment (INTR) event.				Internal Adaptation	Yes	No	n/a
_						M6: Adaptation started by 01/01/2022		□ DD-MM-YYYY	
5						M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY	
						M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY	
						M9: Internal testing complete by 02/12/2022		□ DD-MM-YYYY	
						Testing and Implementation	Yes	No	n/a
						M10: External testing started by 05/12/2022		□ DD-MM-YYYY	
						M11: Final external communication by 01/04/2023		□ DD-MM-YYYY	
						M12: External testing completed by 13/10/2023		□ DD-MM-YYYY	
						III 12. External testing completed by 10/10/2020			

Securities with a fixed negative interest rate, or with a floating interest rate, may result in a payment from the Investor to the Issuer of the security. The Standard is applicable to CSDs acting in their role as both Issuer CSD and Investor CSD. If a CSD accepts only securities with a positive interest rate, or with a floating rate coupon with a floor of zero or above (fixed in the terms and conditions of the security), so that negative cash payments do not occur, then the CSD is deemed to comply with this standard.	N/A	Eurobonds with a fixed negative interest rate are not eligible in Clearstream. Eurobonds with a floating rate coupon resulting in a negative rate are processed as zero floor coupon.	CSDR compliance is under investigation for Investor CSD links				
Business day rule If the payment date of a corporate				Analysis and Communication	Yes	No	n/a
action falls on a non-business day (in the country of the currency in				M1: Analysis started by 30/06/2020		□ DD-MM-YYYY	
which the payment is due), the payment shall be made on the				M2: Initial communication by 01/03/2021		□ DD-MM-YYYY	
next business day. If the next				M3: Analysis completed by 31/07/2021		□ DD-MM-YYYY	
business day falls in the following month and the payment needs to		No change to the		M4: Documentation completed by 31/12/2021		□ DD-MM-YYYY	
be made in the same month, then		current rules (ie for CoBM we will follow the		M5: Detailed external communication by 31/12/2021		⊠ 31/05/2022	
the calculation period shall be adjusted, and the payment date		Day convention as per		Internal Adaptation	Yes	No	n/a
and the record date shall move back one day.		issuance documentation, for		M6: Adaptation started by 01/01/2022		□ DD-MM-YYYY	
back one day.		CeBM the Standard		M7: Adaptation completed by 30/06/2022		⊠ 31/12/2022	
		conventions will be used).		M8: Internal testing started by 01/07/2022		⊠ 16/01/2023	
		Subject to issuers'		M9: Internal testing complete by 02/12/2022		⊠ 28/04/2023	
		compliance.		Testing and Implementation	Yes	No	n/a
				M10: External testing started by 05/12/2022		⊠ 01/05/2023	
				M11: Final external communication by 01/04/2023		□ DD-MM-YYYY	
				M12: External testing completed by 13/10/2023		☐ DD-MM-YYYY	
				M13: Standard implemented by 20/11/2023		□ DD-MM-YYYY	
Payment amounts are always calculated on the end-of-day positions on the record date. If the payment date falls on a non-business day in the country of the currency in which the payment is due, the payment must be made on the next business day. If the next business day would fall in the following month, and the payment needs to be made in the same month (with the payment day being moved to precede the original payment date) then the Modified Following (Adjusted) Business Day Convention must be used.	Adaptation Required	Modified Following (Adjusted) Business Day Convention to be implemented for Fixed Rate securities	Subject to compliance by issuer.				
In order to comply with this rule, one of the following business day conventions should be used at the time of issuance of the security:		Modified Following (Adjusted) Business	Subject to				
Business Day Calculation Convention Period Post-Trade Process	Adaptation Required	Day Convention to be implemented for Fixed	compliance by issuer.				
Following Adjusted Pay the next business day		Rate securities					
Following Unadjusted Pay the next business day							

	Modified Following	Adjusted	Pay the previous business day							
	Securities amou		es amount data should be				Analysis and Communication	Yes	No	n/a
	Uala	following					M1: Analysis started by 30/06/2020		☐ DD-MM-YYYY	
		•	Debt instruments with a				M2: Initial communication by 01/03/2021		□ DD-MM-YYYY	
			nominal value should be denominated in face				M3: Analysis completed by 31/07/2021		□ DD-MM-YYYY	
			amount (FAMT) Debt instruments with no				M4: Documentation completed by 31/12/2021		□ DD-MM-YYYY	
		•	nominal value should be				M5: Detailed external communication by 31/12/2021		□ DD-MM-YYYY	
			denominated in units (UNIT)				Internal Adaptation	Yes	No	n/a
_		•	Equities should be				M6: Adaptation started by 01/01/2022		□ DD-MM-YYYY	
7			denominated in units (UNIT)				M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY	
		•	Investment funds should be denominated in units				M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY	
			(UNIT)				M9: Internal testing complete by 02/12/2022		□ DD-MM-YYYY	
							Testing and Implementation	Yes	No	n/a
							M10: External testing started by 05/12/2022		□ DD-MM-YYYY	
							M11: Final external communication by 01/04/2023		□ DD-MM-YYYY	
							M12: External testing completed by 13/10/2023		□ DD-MM-YYYY	
							M13: Standard implemented by 20/11/2023		□ DD-MM-YYYY	
	Debt instruments denominated in f			N/A, subject to issuer compliance. We will follow issuers T&Cs. No required changes foreseen	Subject to issuers' compliance. No change for both existing and new securities.	None identified so far				
	Debt instruments denominated in ι		al value should be	N/A, subject to issuer compliance. We will follow issuers T&Cs. No required changes foreseen	Subject to issuers' compliance. No change for both existing and new securities.	None identified so far				
	Equities should £	e denominated	in units (UNIT)	N/A, subject to issuer compliance. We will follow issuers T&Cs. No required changes foreseen	Subject to issuers' compliance. No change for both existing and new securities.	None identified so far				

	Investment funds sho	ould be denominated in units (UNIT)	N/A, subject to issuer compliance. We will follow issuers T&Cs. No required changes foreseen	Subject to issuers' compliance. No change for both existing and new securities.	None identified so far				
	Payment time	For European currencies, the cash				Analysis and Communication	Yes	No	n/a
		proceeds of a corporate action should be distributed by Issuers				M1: Analysis started by 30/06/2020		□ DD-MM-YYYY	
		CSDs as early as possible, but no later than 12:00 noon on the				M2: Initial communication by 01/03/2021		□ DD-MM-YYYY	
		payment date (Issuer CSD time).				M3: Analysis completed by 31/07/2021		□ DD-MM-YYYY	
						M4: Documentation completed by 31/12/2021		☐ DD-MM-YYYY	
		For non-European currencies, the cash proceeds of a corporate				M5: Detailed external communication by 31/12/2021		□ DD-MM-YYYY	
		action should be distributed by Issuers CSDs as early as possible,				Internal Adaptation	Yes	No	n/a
8		but no later than 16:30 on the				M6: Adaptation started by 01/01/2022		□ DD-MM-YYYY	
0		payment date (Issuer CSD time).				M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY	
		If the corporate action event would				M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY	
		result in both cash and security movements, then the transactions				M9: Internal testing complete by 02/12/2022		□ DD-MM-YYYY	
		for the debit (or credit) of				Testing and Implementation	Yes	No	n/a
		securities and credit (or debit) of cash proceeds must be executed				M10: External testing started by 05/12/2022		☐ DD-MM-YYYY	
		simultaneously.				M11: Final external communication by 01/04/2023		☐ DD-MM-YYYY	
						M12: External testing completed by 13/10/2023		□ DD-MM-YYYY	
						M13: Standard implemented by 20/11/2023		☐ DD-MM-YYYY	
	action should be dist	rcies, the cash proceeds of a corporate ributed by Issuers CSDs as early as r than 12:00 noon on the payment date	Implemented (subject to receipt of funds from issuers)	Implemented, dependency on the timely payment from the issuers/agents	None identified so far				
	corporate action show	urrencies, the cash proceeds of a uld be distributed by Issuers CSDs as t no later than 16:30 on the payment ne).	Implemented (subject to receipt of funds from issuers)	Implemented, dependency on the timely payment from the issuers/agents	None identified so far				
	security movements,	n event would result in both cash and then the transactions for the debit (or and credit (or debit) of cash proceeds multaneously.	Implemented (for Investor CSD, subject to simultaneous processing by Issuer CSD)	Implemented, dependency on the timely payment from the issuers/agents	None identified so far				

CSD as early as post functionalities such a where available, allot technically possible settlement system. Government debt pa	alld be made available ⁵ by the issuer sible on the payment date using as the night-time settlement (NTS) wing for settlement as soon as at the opening of the securities ayments are expected to be paid in the TS is available)/at the latest at the start	Implemented (subject to receipt of funds from issuers) Implemented (subject to receipt of funds from issuer, Issuer CSD or	Implemented, dependency on the timely payment from the issuers/agents Implemented, dependency on the timely payment from the issuers/agents	None identified so far None identified so far				
		depository)	- Isouoro/agerite					
Notification of processing status	If an issuer, issuer agent, or Issuer CSD cannot process a Corporate				Analysis and Communication	Yes	No	n/a
processing status	Action on the previously				M1: Analysis started by 30/06/2020		□ DD-MM-YYYY	
	announced Payment Date, all Account Servicers must inform				M2: Initial communication by 01/03/2021		□ DD-MM-YYYY	
	Account Owners about the delay				M3: Analysis completed by 31/07/2021		□ DD-MM-YYYY	
	as soon as possible and based on information received from higher				M4: Documentation completed by 31/12/2021		□ DD-MM-YYYY	
	up the custody chain.				M5: Detailed external communication by 31/12/2021		⊠ 31/05/2022	
					Internal Adaptation	Yes	No	n/a
					M6: Adaptation started by 01/01/2022		□ DD-MM-YYYY	
					M7: Adaptation completed by 30/06/2022		⊠ 31/12/2022	
					M8: Internal testing started by 01/07/2022		⊠ 16/01/2023	
					M9: Internal testing complete by 02/12/2022		⊠ 28/04/2023	
					Testing and Implementation	Yes	No	n/a
					M10: External testing started by 05/12/2022		⊠ 01/05/2023	
					M11: Final external communication by 01/04/2023		□ DD-MM-YYYY	
					M12: External testing completed by 13/10/2023		□ DD-MM-YYYY	
					M13: Standard implemented by 20/11/2023		□ DD-MM-YYYY	
announced Paymen specified in Standars shall be responsible CSD on the reasons Corporate Action. Ut issuers and their again otification message participants as early the payment date for payment date for no time). The issuer CS	n cannot be processed on the previously to Date in accordance with the timelines of 8, Issuers and their respective agents for providing information to the Issuer of the delay in the processing of the poon receipt of the information from the ents, the issuer CSD must send a containing this information to its as possible, but no later than 12:15 on the information currencies and 16:45 on the information to its as possible to the information to its as possible to the information to its as possible to the information to its as possible that the parameter of the information to its as a possible that the process and 16:45 on the information to its and the information of CA in the information that the payment of CA in the information that the payment of CA in the information that the processing the information to its and information to i	Adaptation Required	This reporting is not supported today and has to be implemented; define business flows. Extent of implementation required subject to open issues raised with ASEG.	None identified so far				

⁵ The funds should not be subject to any limitations once made available.

⁶ It is expected that payments will be made by 09:30 (Issuer CSD time) to facilitate collateral management. AMI-SeCo will carry out regular fact-finding exercises to monitor actual CA payment times. Payments in Eastern timezone currencies (e.g. Japanese Yen) are expected to be processed in the nighttime settlement.

	the notification messa	possible. Intermediaries shall pass on age through the custody chain to parties are informed of the delay.							
	Elective events	For all mandatory with options							
		and voluntary CA events involving a debit of securities, all				Analysis and Communication	Yes	No	n/a
		intermediaries must ensure that				M1: Analysis started by 30/06/2020		□ DD-MM-YYYY	
		the elected security position is subject to soft blocking if the				M2: Initial communication by 01/03/2021		□ DD-MM-YYYY	
		election is received ahead of the				M3: Analysis completed by 31/07/2021		□ DD-MM-YYYY	
		deadline. Intermediaries will show the elected quantity as an				M4: Documentation completed by 31/12/2021		□ DD-MM-YYYY	
		instructed quantity therefore 'unavailable' for settlement in their				M5: Detailed external communication by 31/12/2021		⊠ 31/05/2022	
		reporting.				Internal Adaptation	Yes	No	n/a
40		Upon receipt of the election,				M6: Adaptation started by 01/01/2022		□ DD-MM-YYYY	
10		Issuer CSDs will also ensure the elected quantity is separated				M7: Adaptation completed by 30/06/2022		⊠ 31/12/2022	
		accounting wise. The elected quantity should remain separated				M8: Internal testing started by 01/07/2022		⊠ 16/01/2023	
		accounting wise from the time the				M9: Internal testing complete by 02/12/2022		⊠ 28/04/2023	
		CA instruction is accepted until (i) the CA event is executed (when				Testing and Implementation	Yes	No	n/a
		the debit takes place) or (ii) until				M10: External testing started by 05/12/2022		⊠ 01/05/2023	
		an instruction is cancelled (for revocable instructions).				M11: Final external communication by 01/04/2023		□ DD-MM-YYYY	
		For mandatory with options CA				M12: External testing completed by 13/10/2023		□ DD-MM-YYYY	
		events, Issuer CSDs should ensure settlement does not occur				M13: Standard implemented by 20/11/2023		□ DD-MM-YYYY	
		after the Market Deadline.							
	involving a debit of set that the elected secu the election is receive Intermediaries will sh	th options and voluntary CA events ecurities, all intermediaries must ensure rity position is subject to soft blocking if ed ahead of the deadline. Now the elected quantity as an erefore 'unavailable' for settlement in	N/A for Issuer CSD Implemented for Investor CSD	N/A	None identified so far				
	the elected quantity is elected quantity shou from the time the CA event is executed (wh	election, Issuer CSDs will also ensure is separated accounting wise. The ald remain separated accounting wise instruction is accepted until (i) the CA then the debit takes place) or (ii) until an ed (for revocable instructions).	Potential Adaptation Required	Already implemented for some events. To be considered per event type.	None identified so far				

Pormardistry with cofornic CA eyents, Issuer (SDs should ensure self-interest down indicator in the CA notification message to berrify that a security costor will refuse to be refuse the completed of the foliable of the									
notification message to identify that a security position will be (soft) blocked. A valiability of orfatul options Account Servicers shall ensure that a Corporate Action event that be core than one option. The debat option for that event. NA None identified as a result of participation in a default option for that event. NA None identified as a result of participation in a default option and the corporate Action events that have more than one option. The debat option events that have more than one option. The debat option events that have more than one option. The debat option in an event shall be confirmed using the same meeting event type. NA A realistic action as a complete that the corporate Action events that have more than one option. The debat option in an event shall be confirmed using the same meeting event type. NA A realistic action as a complete			Adaptation	·					
default options with at a Corporate Action event. Mil. Analysis and Communication Mil. Analysis and Com		notification message to identify that a security position will		some events. Addition of event types for which this field will be					
M1: Analysis started by \$006(2020						Analysis and Communication	Yes	No	n/a
M3: Analysis completed by 31072021		notification message identifies the				M1: Analysis started by 30/06/2020		□ DD-MM-YYYY	
M4: Documentation completed by 31/12/2021		default option for that event.				M2: Initial communication by 01/03/2021		□ DD-MM-YYYY	
M6: Detailed external communication by 31/12/2021						M3: Analysis completed by 31/07/2021		□ DD-MM-YYYY	
Implemented N/A None identified so far N/A Adaptation started by 0.010/1.2022						M4: Documentation completed by 31/12/2021		□ DD-MM-YYYY	
Implemented Implemented N/A						M5: Detailed external communication by 31/12/2021		□ DD-MM-YYYY	
Implemented N/A None Identifies of lar Wife Adaptation completed by 3006/2022						Internal Adaptation	Yes	No	n/a
M8: Internal testing complete by 00/07/2022	11		Implemented	NI/A	None identified	M6: Adaptation started by 01/01/2022		□ DD-MM-YYYY	
M9: Internal testing complete by 02/12/2022	• • • • • • • • • • • • • • • • • • • •		Implemented	IN/A	so far	M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY	
Testing and Implementation M10: External testing started by 05/12/2022 M11: Final external communication by 01/04/2023 M12: External testing completed by 13/10/2023 M13: Standard implemented by 20/11/2023 A default option should be present in all Corporate Action events that have more than one option. The default option as identified by the Issuer CSD must be transmitted unchanged through the custody chain. Handling of fees for meeting rolated CA events of meeting rolated CA events are sensitived as a result of participation in an event shall be confirmed using the same meeting event type. Analysis and Communication Yes No No No No Mill: Analysis started by 30/06/2020 M1: Analysis started by 30/06/2020 M2: Initial communication by 01/03/2021 M3: Analysis completed by 31/10/7/2021 M4: Documentation completed by 31/10/7/2021 M5: Detailed external communication by 91/12/2021 Internal Adaptation M6: Adaptation started by 01/01/2022 M7: Adaptation completed by 30/06/2022						M8: Internal testing started by 01/07/2022		☐ DD-MM-YYYY	
M10: External testing started by 05/12/2022						M9: Internal testing complete by 02/12/2022		□ DD-MM-YYYY	
M11: Final external communication by 01/04/2023						Testing and Implementation		No	
A default option should be present in all Corporate Action events that have more than one option. The default option as identified by the Issuer CSD must be transmitted unchanged through the custody chain. Handling of fees for meeting related CA events are used to be credited / debited as a result of participation in an event shall be confirmed using the same meeting event type. All fees (e.g. solicitation fees, consent fees) to be credited / debited as a result of participation in an event shall be confirmed using the same meeting event type. Analysis and Communication Yes No 12 Analysis started by 30/06/2020 Analysis started by 30/06/2020 M2: Initial communication by 01/03/2021 M3: Analysis completed by 31/12/2021 M4: Documentation completed by 31/12/2021 M5: Detailed external communication by 31/12/2021 Internal Adaptation M6: Adaptation started by 01/01/2022 M7: Adaptation completed by 30/06/2020 A consent fees to be credited / debited as a result of participation in an event shall be confirmed using the same meeting event type.						M10: External testing started by 05/12/2022		☐ DD-MM-YYYY	
A default option should be present in all Corporate Action events that have more than one option. The default option as identified by the Issuer CSD must be transmitted unchanged through the custody chain. Handling of fees for meeting related CA events ### Analysis and Communication ### Analysis started by 30/06/2020 ### Analysis started by 30/06/2020 ### Analysis started by 30/06/2020 ### Analysis competed by 31/07/2021 ### DD-MM-YYYY DM-M2: Initial communication by 01/03/2021 DD-MM-YYYY DM-M2: Initial communication by 01/03/2021 DD-MM-YYYY DM-M3: Analysis completed by 31/12/2021 DD-MM-YYYY DM-M3: Analysis completed by 31/12/2021 DD-MM-YYYY DM-M4: Documentation completed by 31/12/2021 DD-MM-YYYY DM-M4: Documentation by 01/03/2021 DD-MM-YYYY DM-M4: Documentation by 01/03/2022 DD-MM-YYYY DM-M4: Docum						M11: Final external communication by 01/04/2023		□ DD-MM-YYYY	
A default option should be present in all Corporate Action events that have more than one option. The default option as identified by the Issuer CSD must be transmitted unchanged through the custody chain. Handling of fees for meeting related CA events All fees (e.g. solicitation fees, consent fees) to be credited / debited as a result of participation in an event shall be confirmed using the same meeting event type. All fees (e.g. solicitation fees, consent fees) to be credited / debited as a result of participation in an event shall be confirmed using the same meeting event type. Analysis and Communication M1: Analysis started by 30/06/2020 M2: Initial communication by 01/03/2021 M3: Analysis completed by 31/07/2021 M4: Documentation completed by 31/12/2021 M5: Detailed external communication by 31/12/2021 M6: Adaptation started by 01/01/2022 M7: Adaptation completed by 30/06/2022 M7: Adaptation completed by 30/06/2022 M7: Adaptation completed by 30/06/2022						M12: External testing completed by 13/10/2023		☐ DD-MM-YYYY	
events that have more than one option. The default option as identified by the Issuer CSD must be transmitted unchanged through the custody chain. Handling of fees for meeting related CA events related CA events of the custody chain. All fees (e.g. solicitation fees, consent fees) to be credited / debited as a result of participation in an event shall be confirmed using the same meeting event type. All fees (e.g. solicitation fees, consent fees) to be credited / debited as a result of participation in an event shall be confirmed using the same meeting event type. All fees (e.g. solicitation fees, consent fees) to be credited / debited as a result of participation in an event shall be confirmed using the same meeting event type. M2: Initial communication by 01/03/2021						M13: Standard implemented by 20/11/2023		□ DD-MM-YYYY	
for meeting related CA events related CA events of the confirmed using the same meeting event type. M1: Analysis started by 30/06/2020		events that have more than one option. The default option as identified by the Issuer CSD must be transmitted unchanged through the custody chain.				Analysis and Communication	Yes	No	n/a
M2: Initial communication by 01/03/2021		for meeting consent fees) to be credited /				*			
using the same meeting event type. M3: Analysis completed by 31/07/2021									
M4: Documentation completed by 31/12/2021 □ DD-MM-YYYY □ M5: Detailed external communication by 31/12/2021 □ 31/05/2022 □ Internal Adaptation Yes No n/a M6: Adaptation started by 01/01/2022 □ DD-MM-YYYY □ M7: Adaptation completed by 30/06/2022 □ 31/12/2022 □		using the same meeting event				·			
M5: Detailed external communication by 31/12/2021 □ 31/05/2022 □ Internal Adaptation Yes No n/a M6: Adaptation started by 01/01/2022 □ DD-MM-YYYY □ M7: Adaptation completed by 30/06/2022 □ 31/12/2022 □		туре.							
Internal Adaptation Yes No n/a M6: Adaptation started by 01/01/2022 M7: Adaptation completed by 30/06/2022 Under DD-MM-YYYY Under DD-	12								
M6: Adaptation started by 01/01/2022 □ DD-MM-YYYY □ M7: Adaptation completed by 30/06/2022 □ ⊠ 31/12/2022 □						,			
M7: Adaptation completed by 30/06/2022 □ ⊠ 31/12/2022 □						·		□ DD-MM-YYYY	
The Assertation Completed by Colored Laboratory						·			
								⊠ 16/01/2023	

Mb: Internal testing complete by Q2/12/2022
M11: Final external communication by 0104/2023 © D-MM-YYYY M12: External testing completed by 13/10/2023 © D-MM-YYYY M13: Standard implemented by 20/11/2023 © D-MM-YYYY M14: Post-part of a meeting fee are outlined below: A bond/sharholder has to incorporated below: A bond/sharholder has to incorporated into certain deadline) in order to occive the payment. Adaptation until a certain deadline) in order to occive the payment. Adaptation until a certain deadline) in order to occive the payment. Adaptation until a certain deadline) in order to occive the fee without having to participate/instruct at the meeting – the rule is as follows: everyone who has a holding as of a certain date (record date) will receive the fee. In addition to the above use cases, the event may also include a condition that resolutions have to pass at the meeting in order to receive a fee. Reversal of CA movements of a CA. In case of a cash reversal, the pre-advice must be sent sufficiently in advance of any reversal of a CA. In case of a cash reversal, the pre-advice must be sent sufficiently in advance of the reversal so that recipilents have adequate time for cash management. M2: External testing completed by 31/10/2021 © D-MM-YYYY © M3: Nanalysis started by 30/06/2021 © D-MM-YYYY © M3: Nanalysis completed by 31/10/2021 © D-MM-YYYY © M3: Nanalysis completed by 31/10/2021 © D-MM-YYYY © M3: Nanalysis completed by 31/10/2021 © D-MM-YYYY © M4: Decumentation on munication by 31/10/2021 © D-MM-YYYY © M4: Decumentation on munication by 31/10/10/202 © D-MM-YYYY © M6: Adaptation started by 01/01/2022 © D-MM-YYYY © M6: Adaptation started by 01/01/2022 © D-MM-YYYY © D-MM-YYYY D-M3: Nanalysis completed by 31/10/10/202
A holder of a security may be entitled to receive a fee following the announcement of a meeting fee. This fee may be paid to all holders of the security or alternatively only to certain holders of the security or alternatively only to certain holders of the security or alternatively only to certain holders of the security or alternatively only to certain holders of the security in the payment of a meeting fee are outlined below. A bond/shareholder has to instruct a certain option until a certain deadline in order to receive the payment. A bond/shareholder has to instruct active a meeting because the early (a certain option until a certain deadline) in order to receive the payment. Albond/shareholder has to instruct active a meeting because the set of the service of the set of the service of the set of the service of the set of the s
A holder of a security may be entitled to receive a fee following the announcement of a meeting fee. This fee may contain holders of the security fulfilling certain criteria. The different constallation of polinows which may lead to the payment of a meeting fee are outlined below. A bond/shareholder has to instruct (a certain option until a certain deadline) in order to receive the payment. A bond/shareholder has to instruct early cartain option until a certain deadline) in order to receive the payment. A bond/shareholder has to instruct early cartain option until a certain deadline) in order to receive the payment. A bond/shareholder has receives the rate announced in the early incentive premium. Filed. All bond/shareholders receive the fee without having to participate/instruct at the meeting — the rule is as follows: everyone who has as holding as of a certain date (record date) will receive the fee. In addition to the above use cases, the event may also include a condition that resolutions have to pass at the meeting in order to receive a fee. Reversal of CA movements Several of CA a pre-advice must be sent sificiently in advance of the reversal of a CA. In case of a cash reversal, the pre-advice must be sent sufficiently in advance of the reversal so that recipionts have adequate time for cash management. A pre-advice must be sent sufficiently in advance of the reversal so that recipionts have adequate time for cash management. M3: Analysis carded by 31/07/2021 Signobus PobMM-YYYY M3: Debalmy M3: Pobled external communication by 31/10/2021 Signobus PobMM-YYYY M3: Debalmost Pobled PobMM-YYYY M4: Documentation completed by 31/10/2021 Signobus PobMM-YYYY M3: Debalmost Pobled PobMM-YYYY M4: Documentation ompleted by 31/10/2021 Signobus PobMM-YYYY M5: Debalmost Pobled PobMM-YYYY M5: Debalmost Pobled PobMM-YYYY M5: Debalmost Pobled PobMM-YYYY M5: Debalmost Pobled PobMM-YYYY M5
A holder of a security may be entitled to receive a fee following the announcement of a meeting fee. This fee may be paid to all holders of the security fulfilling certain criteria. The different constellation of options which may lead to the payment of a meeting fee are outlined below: A bond/shareholder has to instruct early cartain option until a certain deadline) in order to obtain an early incentive premium. The bond/shareholder has to instruct early cartain option until a certain deadline) in order to obtain an early incentive premium. The bond/shareholder has to instruct early cartain option until a certain deadline) in order to obtain an early incentive premium. The bond/shareholder has to instruct early cartain option until a certain deadline) in order to obtain an early incentive premium field. All bond/shareholders receive the fee without having to perflicipate/mixtured at the meeting – the rule is as follows: everyone who has a holding as of a certain date (record date) will receive the fee. In addition to the above use cases, the event may also include a condition that resolutions have to pass at the meeting in order to receive a fee. Reversal of CA. In case of a cash reversal, the pre-advice message must be issued in advance of any reversal of a CA. In case of a cash reversal, the pre-advice must be sent sufficiently in advance of the reversal so that recipients have adequate time for cash management. Adaptation Adaptation violatic to final quidance from SWIFT / SMIPC, to be incorporated by 3107/2021 30 3109/2022 10 Db-MM-YYYY 10 MB-MM-YYYY 10 MB-MM-YY
following the announcement of a meeting fee. This fee may be paid to all holders of the security fulfilling certain criteria. The different constellation of options which may lead to the payment of a meeting fee are outlined below: A bond/shareholder has to instruct (a certain option until a certain deadline) in order to obtain an early incentive premium. The bond/shareholder has to instruct early (a certain option until a certain deadline) in order to obtain an early incentive premium. The bond/shareholder has the fee without having to participate/instruct at the meeting – the rule is as follows: everyone who has a holding as of a certain date (record date) will receive the fee. In addition to the above use cases, the event may also include a condition that resolutions have to pass at the meeting in order to receive a fee. Reversal of CA movements Reversal of CA movements Analysis and Communication Yee No M1: Analysis and Communication M6: Analysis completed by 31/07/2021 © DD-MM-YYYY © M6: Detailed external communication by 01/03/2021 © DD-MM-YYYY © M6: Detailed external communication by 01/03/2021 © DD-MM-YYYY © M6: Detailed external communication by 01/03/2021 © DD-MM-YYYY © M6: Analysis completed by 31/12/2021 © DD-MM-YYYY © M6: Analysis completed by 31/12/2021 © DD-MM-YYYY © M6: Detailed external communication by 01/10/12/2022 © DD-MM-YYYY © M6: Adaptation started by 01/10/12/2022 © DD-MM-YYYY © M6: Adap
movements issued in advance of any reversal of a CA. In case of a cash reversal, the pre-advice must be sent sufficiently in advance of the reversal so that recipients have adequate time for cash management. M1: Analysis started by 30/06/2020 M2: Initial communication by 01/03/2021 M3: Analysis completed by 31/07/2021 M4: Documentation completed by 31/12/2021 M5: Detailed external communication by 31/12/2021 M6: Adaptation M6: Adaptation started by 01/01/2022 DD-MM-YYYY Initernal Adaptation M6: Adaptation started by 01/01/2022
of a CA. In case of a cash reversal, the pre-advice must be sent sufficiently in advance of the reversal so that recipients have adequate time for cash management. M1: Analysis started by 30/06/2020 M2: Initial communication by 01/03/2021 M3: Analysis completed by 31/07/2021 M4: Documentation completed by 31/12/2021 M5: Detailed external communication by 31/12/2021 M6: Adaptation M6: Adaptation started by 01/01/2022 M6: Adaptation started by 01/01/2022 M8: DD-MM-YYYY M8: Documentation completed by 31/12/2021 M6: Adaptation started by 01/01/2022
sufficiently in advance of the reversal so that recipients have adequate time for cash management. M3: Analysis completed by 31/07/2021
Preversal so that recipients have adequate time for cash management. ### M3: Analysis completed by 31/07/2021 ### DD-MM-YYYY □ ### M4: Documentation completed by 31/12/2021 ### DD-MM-YYYY □ ### M5: Detailed external communication by 31/12/2021 ### M6: Adaptation Yes No
management. M4: Documentation completed by 31/12/2021 □ DD-MM-YYYY □ M5: Detailed external communication by 31/12/2021 □ 31/05/2022 □ Internal Adaptation Yes No n/a M6: Adaptation started by 01/01/2022 □ DD-MM-YYYY □
M5: Detailed external communication by 31/12/2021 □ ⊠ 31/05/2022 □ Internal Adaptation Yes No n/a M6: Adaptation started by 01/01/2022 □ DD-MM-YYYY □
M6: Adaptation started by 01/01/2022 □ DD-MM-YYYY □
3
3
M7: Adaptation completed by 30/06/2022 □ 🖂 31/12/2022 □
M8: Internal testing started by 01/07/2022 □ ☑ 16/01/2023 □
M9: Internal testing complete by 02/12/2022 □ ☑ 28/04/2023 □
Testing and Implementation Yes No n/a
M10: External testing started by 05/12/2022 □ 図 01/05/2023 □
M11: Final external communication by 01/04/2023 □ DD-MM-YYYY □
M12: External testing completed by 13/10/2023 □ □ DD-MM-YYYY □

	before the reversal is CA payment sufficien	er must send a reversal announcement is processed to allow the recipient of the nt time to pre-fund the reversal of the the reversal takes place.	Adaptation Required	Alignment of reversal reason codes.	None identified so far				
	Processing of foreign currency	To process payments in currencies not eligible in the				Analysis and Communication	Yes	No	n/a
	CA payments	settlement system, the CSD must				M1: Analysis started by 30/06/2020		□ DD-MM-YYYY	
		instruct the cash correspondent to debit the account of the paying				M2: Initial communication by 01/03/2021		□ DD-MM-YYYY	
		agent and to pay the funds to an				M3: Analysis completed by 31/07/2021		□ DD-MM-YYYY	
		account of the security holder. The CSD must send only the				M4: Documentation completed by 31/12/2021		□ DD-MM-YYYY	
		corporate action confirmation to the security holder only upon				M5: Detailed external communication by 31/12/2021		□ DD-MM-YYYY	
		receipt of the confirmation from				Internal Adaptation	Yes	No	n/a
		the cash correspondent that the cash has been transferred		The payments in foreign currencies are	None identified	M6: Adaptation started by 01/01/2022		□ DD-MM-YYYY	
14		successfully.	Implemented	processed in the ICSD	so far	M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY	
				environment		M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY	
						M9: Internal testing complete by 02/12/2022		□ DD-MM-YYYY	
						Testing and Implementation	Yes	No	n/a
						M10: External testing started by 05/12/2022		□ DD-MM-YYYY	
						M11: Final external communication by 01/04/2023		□ DD-MM-YYYY	
						M12: External testing completed by 13/10/2023		□ DD-MM-YYYY	
						M13: Standard implemented by 20/11/2023		□ DD-MM-YYYY	
	currency not eligible	curities paying cash proceeds in a in the settlement system, the CSD a process to handle payments in that							
	ISO 20022 messages for	Account Servicers must have the capability to support ISO 20022				Analysis and Communication	Yes	No	n/a
	corporate actions	messages for the processing of				M1: Analysis started by 30/06/2020		☐ DD-MM-YYYY	
		corporate actions.				M2: Initial communication by 01/03/2021		□ DD-MM-YYYY	
						M3: Analysis completed by 31/07/2021		☐ DD-MM-YYYY	
15						M4: Documentation completed by 31/12/2021		☐ DD-MM-YYYY	
						M5: Detailed external communication by 31/12/2021		⊠ 31/05/2022	
						Internal Adaptation	Yes	No	n/a
						M6: Adaptation started by 01/01/2022		☐ DD-MM-YYYY	
						M7: Adaptation completed by 30/06/2022		⊠ 31/12/2022	

					M8: Internal testing started by 01/07/2022		⊠ 16/01/2023	
					M9: Internal testing complete by 02/12/2022		⊠ 31/03/2023	
					Testing and Implementation	Yes	No	n/a
					M10: External testing started by 05/12/2022		⊠ 01/05/2023	
					M11: Final external communication by 01/04/2023		□ DD-MM-YYYY	
					M12: External testing completed by 13/10/2023		□ DD-MM-YYYY	
					M13: Standard implemented by 20/11/2023		□ DD-MM-YYYY	
Message Name	Message Identifier							
Corporate Action Notification	seev.031	Adaptation Required						
Corporate Action Event Processing Status Advice	seev.032	Adaptation Required						
Corporate Action Instruction	seev.033	Adaptation Required						
Corporate Action Instruction Status Advice	seev.034	Adaptation Required						
Corporate Action Movement Preliminary Advice	seev.035	Adaptation Required	Implementation of ISO 20022 and as well as					
Corporate Action Movement Confirmation	seev.036	Adaptation Required	specific mapping, validations and processing of the	None identified so far				
Corporate Action Movement Reversal Advice	seev.037	Adaptation Required	- messages in both versions ISO15022 and ISO20022.					
Corporate Action Cancellation Advice	seev.039	Adaptation Required	_					
Corporate Action Instruction Cancellation Request	seev.040	Adaptation Required						
Corporate Action Instruction Cancellation Request Status Advice	seev.041	Adaptation Required						
Corporate Action Instruction Statement Report	seev.042	N/A	Implementation of ISO 20022 and as well as	None identified				
Corporate Action Movement Preliminary Advice Cancellation Advice	seev.044	Adaptation Required	specific mapping, validations and processing of the messages in both	so far				

Meet	ing Notification	seev.001	Adaptation Required	versions ISO15022 and ISO20022.
Meet	ing cellation	seev.002	Adaptation Required	
	ing Entitlement ication	seev.003	Adaptation Required	
Meet	ing Instruction	seev.004	Adaptation Required	
	ting Instruction cellation uest	seev.005	Adaptation Required	
Meet Statu	ing Instruction	seev.006	Adaptation Required	
Exec	ting Vote tution irmation	seev.007	Adaptation Required	
	ing Result emination	seev.008	Adaptation Required	