

# **Corporate Actions Adaptation Plan**

### **Euroclear Finland**

Activity	Corporate Actions
Plan submitted by	Euroclear Finland
NSG	Finland
Date	June 2021

### Background

The Adaptation Plan provides information on the changes which will be implemented to meet the AMI-SeCo 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 highlevel summary of the changes in order to implement the AMI-SeCo Standards. Section 2 (Adaptation Plan Table) then provides a more detailed overview per Standard covering a feasibility assessment and the implementation milestones.

#### Cover Letter

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As a part of the launch of the new CSD system Infinity in May 2018 Euroclear Finland implemented CA events according to CAJWG, CASG and SMPG standards. In addition, 20022 messages for corporate actions and settlement were implemented. Hence, the compliance with CMH-TF CA standards is high on the Finnish market. However, the CSD system now supports CA events which are relevant on the Finnish market and they do not cover all CA events listed in SCoRe standards. EFi does not currently act as investor CSD for bond instruments so the variety of various bonds and CA events is limited compared to other markets. Missing CA events have been analysed and prioritised by the CSD and the depository participants based on the current variety of bond instruments and recognised needs for the future. Relevant CA events and enhancements to existing CA events will be implemented post November 2023. The remaining CA events which are not relevant on the Finnish market will be processed later when need be.

As a part of SRD II requirements EFi implemented 20022 messages and related processes for general meetings and disclosure in September 2020. Then EFi is compliant with CMH-TF standard.

Since the go-live dates of T2 & T2S consolidation and ECMS platform were rescheduled EFi has rescheduled the go-live date for joining T2S from November 2022 to September 2023. The roadmap for joining T2S in September 2023 is the priority number one on the Finnish market. All other priorities are being analysed in proportion to the T2S roadmap and the mandatory changes stemming from CSDR Settlement Penalty Mechanism and T2-T2S consolidation. Having all issues completed according to the original adaptation plan by November 2023 is challenging. EFi will initiate a planning round for the remaining ECMS related tasks in 2021 and the adaptation plan will be created by the end of 2022. Therefore exact deadline dates for completing activities cannot be provided at this point.

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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 Milestones			
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of t	ne follo	owing activities:	
				-		Analysis and Communication	Yes	No	n/a
				<ul> <li>The gaps are related to:</li> <li>reversal of CA</li> </ul>		M1: Analysis started by 30/06/2020		DD-MM-YYYY	
				• reversar of CA event		M2: Initial communication by 01/03/2021		DD-MM-YYYY	
				<ul> <li>certain CA events, which are</li> </ul>		M3: Analysis completed by 31/07/2021		DD-MM-YYYY	
				regarded relevant		M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
		The Business Processes &		on the Finnish market, are		M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	
		Workflows and Key Data		missing		Internal Adaptation	Yes	No	n/a
	Harmonised business process	Elements are described in the following sections of the AMI-	Adaptation	<ul> <li>missing ISO CA 20022 messages</li> </ul>		M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
1	and workflows per         SeCo Corporate Action         Required           CA event         Standards document. Please         Image: Calification of the second s	(seev.032, seev.037,		M7: Adaptation completed by 30/06/2022		DD-MM-YYYY			
	CA event	refer to Standards 1A to 1H below:		seev.037, seev.044		M8: Internal testing started by 01/07/2022		DD-MM-YYYY	
						M9: Internal testing complete by 02/12/2022		DD-MM-YYYY	
				The high-level roadmap for T2S migration and ECMS		Testing and Implementation	Yes	No	n/a
				has been published. The implementation plan for gaps related to ECMS will		M10: External testing started by 05/12/2022		DD-MM-YYYY	
						M11: Final external communication by 01/04/2023		DD-MM-YYYY	
			gaps related to ECMS will be created by the end of 2022.		M12: External testing completed by 13/10/2023		DD-MM-YYYY		
				2022.		M13: Standard implemented by 20/11/2023		DD-MM-YYYY	
1A	Corporate Action Notification	The Account Servicer shall 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.							
Additional Information	Business Processes & Workflows	Key Data Elements							
l Infe	1a. Notify [ca.1.01]	Table 1	Implemented						
litional	1b. Update [ca.1.02]	Table 1	Implemented						
Add	1c. Cancel [ca.1.03]	Table 2	Implemented						
1B	Corporate Action Instruction	Instructions on elective corporate actions shall be processed in accordance with a set of harmonised business processes, workflows and key data elements.							

AMI-	SeCo Standard		Feasibility Ass	essment		Implementation Milestones
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the following activities:
	Business Processes & Workflows	Key Data Elements				
	2a. Instruction [ca.2.01]	Table 3	Implemented			
ion	2b. Instruction Status Advice [ca.2.02]	Table 4	Implemented			
Informat	2c. Instruction Cancellation Request [ca.2.03]	Table 5	Implemented			
Additional Information	2d. Instruction Cancellation Request Status Advice [ca.2.04]	Table 6	Implemented			
1C	Corporate Action Advice	The Account Servicer shall 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				
Additional Information	3a. Movement Preliminary Advice [ca.3.01]	Table 7	Implemented	seev.035 message is in place already today. However, it is not processed for voluntary and with choice events The CSD system sends corporate action instruction status advice messages seev.034 for CA instructions received in the CSD system. Once the CA event has been settled, a corporate action movement confirmation message seev.036 is sent. In Finland instructed balances in CA instructions are settled 100 % on the payment date or the event is withdrawn completely and then CA instructions are cancelled. If entitlement messages were sent, they would be sent on record day end-of- day i.e. one business day prior to the payment date on		

AMI-	SeCo Standard		Feasibility Ass	essment		Implementation Milestones
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the following activities:
	-			which the confirmation messages are sent by noon.at the latest. This communication is sufficient at the moment.		
	3b. Movement Preliminary Advice Cancellation [ca.3.02]	Table 8	Adaptation Required	seev.044 message is not currently available in reversal process, it is planned to be implemented post November 2023 see also No 13, 15		
1D	Corporate Action Confirmation	The Account Servicer shall confirm the execution of a corporate action in accordance with a set of harmonised business processes, workflows and key data elements.				
	Applicable Business Processes & Workflows	Key Data Elements				
ıtion	4a. CA Event Processing Status Advice[ca.4.01]	Table 9	Adaptation Required	seev.032 message is not currently supported, it is planned to be implemented post November 2023 see also No 9, 15		
Additional Information	4b. Movement Confirmation [ca.4.02]	Table 10	Implemented			
Addition	4c. Payment Confirmation [ca.4.03]	Table A and B	Implemented			
1E	Corporate Action Reversal	The Account Servicer shall execute the reversal of a corporate action in accordance with a set of harmonised business processes, workflows and key data elements.				
Additional	Applicable Business Processes & Workflows	Key Data Elements				

AMI-	SeCo Standard		Feasibility Ass	essment		Implementation Milestones
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the following activities:
	5a. Movement Preliminary Advice [ca.5.01]	Table 7	Adaptation Required	seev.044 message is not currently available in reversal process, it is planned to be implemented post November 2023 see also No 3b, 5c, 13, 15,		
	5b. Payment Confirmation [ca.5.02]	Table A and B	Adaptation Required	implementation of payment cancellation message in case of reversal is planned to be implemented post November 2023		
	5c. Movement Reversal Advice [ca.5.03]	Table 11	Adaptation Required	seev.037 and seev.044 message are not currently available in reversal process , to be implemented post November 2023 see also No 13, 15		
1F	Meeting Event Notifications	The Account Servicer shall 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				
uo	1a. Meeting Notification [me.1.01]	Table 12	l Implemented			
Informati	1b. Meeting Cancellation [me.1.02]	Table 13	Implemented			
Additional Information	1c. Meeting Entitlement Notification [me.1.03]	Table 14	Implemented			
1G	Meeting Event Instructions	The Account Owner (or the party holding the right to vote) shall instruct on meeting events in accordance with a set of harmonised business processes, workflows and key data elements.				

AMI-	SeCo Standard		Feasibility Ass	essment		Implementation Milestones			
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the following activities:			
	Business Processes & Workflows	Key Data Elements							
	2a. Meeting Instruction [me.2.01]	Table 15	Implemented						
	2b. Meeting Instruction Cancellation Request [me.2.02]	Table 17	Implemented						
	2c. Meeting Instruction Status [me.2.03]	Table 16	Implemented						
	2d. Meeting Vote Execution Confirmation [me.2.04]	Table 18	Implemented	-					
1H	Meeting Event Results	The Account Servicer shall disseminate meeting results in accordance with a set of harmonised business processes, workflows and key data elements.							
	Business Processes & Workflows	Key Data Elements							
Additional Information	3a. Meeting Result Dissemination [me.3.01]	Table 19	Implemented						
						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	
		The corporate action		Implementation of CA		M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
	Provision of data	notification, as communicated by the Account Servicer, shall		events marked as adaptation required below		M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	
2	necessary for calculation of	include the necessary data		are planned to be		Internal Adaptation	Yes	No	n/a
	proceeds	elements required to calculate the cash and / or securities		implemented post November 2023		M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
		movements.				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	

AMI-	SeCo Standard		Feasibility Ass	essment		Implementation Milestones			
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of	the foll	owing activities:	
						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	
	Business Process	es & Workflows							
	CA Event ID	CA Event Name							
	1. ACTV	Trading Status: Active	N/A	not CA event hence N/A on the Finnish market					
		Repurchase Offer / Issuer Bid / Reverse Rights	Adaptation Required	Planned to be implemented <b>post</b> November 2023					
	3. BMET	Bond Holder Meeting	Implemented						
	4. BPUT	Put Redemption	N/A	not relevant on the Finnish market					
	5. BRUP	Bankruptcy	Implemented						
	6. CAPI	Capitalisation	N/A	not relevant on the Finnish market					
	7. CERT	Non-US TEFRA D Certification	N/A						
	8. CHAN	Change	Implemented						
	9. CLSA	Class Action / Proposed Settlement	N/A	not relevant on the Finnish market					
	10. CMET	Court Meeting	Implemented						
	11. CONS	Consent	Adaptation Required	Event exists already but the content is not aligned with SCoRe standards. Planned to be implemented post November 2023.					
	12. CREV	Credit Event	Adaptation Required	Planned to be implemented <b>post</b> November 2023					
	13. DFLT	Bond Default	N/A	not relevant on the Finnish market					
	14. DLST	Trading Status: Delisted	N/A	not CA event hence N/A on the Finnish market					
	<b>15.</b> DRAW	Drawing	N/A	not relevant on the Finnish market					
	16. DSCL	Disclosure	Implemented	implemented as a part SRD II requirements					
	17. DTCH	Dutch Auction	Adaptation Required	Planned to be implemented post November 2023.					
	18. EXOF	Exchange	Implemented	EXOF CHOS is not used in Finland					
	<b>19.</b> EXTM	Maturity Extension	Adaptation Required	Planned to be implemented <b>post</b> November 2023					

AMI-S	SeCo Standard		Feasibility Ass	essment		Implementation Milestones		
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the transmission of transmission of the transmission of	ne following activities:	
	<b>20.</b> INCR Ir	ncrease in Value	N/A	not relevant on the Finnish market				
	<b>21.</b> INFO Ir	nformation	Adaptation Required	Planned to be implemented <b>post</b> November 2023				
	<b>22.</b> INTR Ir	nterest Payment	Implemented	INTR CHOS not supported in Finland				
	23. LIQU L	iquidation Payment	Implemented	only CASH option possible and CHOS not supported on the Finnish market				
	24. MCAL F	ull Call / Early Redemption	Implemented					
	<b>25.</b> OTHR C	Other Event	Implemented	VOLU event not supported				
	<b>26.</b> PARI F	Pari-Passu	Implemented					
		Partial Redemption Without Pool	Implemented					
	28. PINK P	ayment in Kind	Implemented	OTHR option not supported				
	29. PLAC F	Place of Incorporation	N/A	not relevant on the Finnish market				
	<b>30.</b> PPMT Ir	nstalment Call	N/A	not relevant on the Finnish market				
		Partial Redemption With Pool Factor	Implemented					
	32. REDM F	inal Maturity	Implemented					
	33. REDO R	Redenomination	N/A	not relevant on the Finnish market				
	34. REMK R	Remarketing Agreement	N/A	not relevant on the Finnish market				
	<b>35.</b> RHDI Ir	ntermediate Securities Distribution	Implemented					
	36. SUSP T	rading Status: Suspended	N/A	not CA event hence N/A on the Finnish market				
	37. TEND T	ender / Acquisition / Takeover / Purchase Offer	Implemented	TEND CHOS not supported				
	<b>38.</b> TREC 7	Fax Reclaim	N/A					
	<b>39.</b> WTRC V	Vithholding Tax Relief Certification	N/A					
	<b>40.</b> WRTH V	Vorthless	Implemented					
	Consistency of	Investor (I)CSDs and Custodians		Implementation of CA		Analysis and Communication	Yes No	n/a
2	information provided by Issuer	shall remit information on CA events in accordance with the		events marked as adaptation required below		M1: Analysis started by 30/06/2020	D DD-MM-YYYY	
3	CSDs, Investor CSDs &	information received from the		are planned to be implemented <b>post</b>		M2: Initial communication by 01/03/2021	DD-MM-YYYY	
	Custodians	Issuer (I)CSD. All CA event types announced by the Issuer		November 2023.		M3: Analysis completed by 31/07/2021	DD-MM-YYYY	

AMI-	SeCo Stand	lard		Feasibility Ass	essment		Implementation Milestones			
No.	Name of S	Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the terms of	ne follo	owing activities:	
	-		CSD must be supported by all Investor (I)CSDs / Custodians.				M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
			All Issuer CSDs shall use		see also the reply in standard 2		M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	
			corporate action event types in a consistent manner.				Internal Adaptation	Yes	No	n/a
							M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
							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	
							M13: Standard implemented by 20/11/2023		DD-MM-YYYY	
	different C scope of t	CSDs. The C he Standarc daptations a	in an individual CSD, and across CA events listed below are in the d. Please indicate for each CA event are required in order to adhere to the							
	C. Event ID	A	CA Event Name							
	1. ACT	-V -	Trading Status: Active	N/A	not CA event hence N/A on the Finnish market					
	2. BIDS		Repurchase Offer / Issuer Bid / Reverse Rights	Adaptation Required	Planned to be implemented <b>post</b> November 2023.					
	3. BME	ET I	Bond Holder Meeting	Implemented						
	<b>4.</b> BPU	IT I	Put Redemption	N/A	not relevant on the Finnish market					
	5. BRU	JP I	Bankruptcy	Implemented						
	6. CAP	) (	Capitalisation	N/A	not relevant on the Finnish market					
	<b>7.</b> CER	RT I	Non-US TEFRA D Certification	N/A						
	8. CHA	AN (	Change	Implemented						
	9. CLS	A (	Class Action / Proposed Settlement	N/A	not relevant on the Finnish market					
	10. CME	Т	Court Meeting	Implemented						
	11. CON	IS (	Consent	Adaptation Required	event already exists but the content is not aligned with SCoRe standards. Planned					

AMI-S	eCo Standard		Feasibility Ass	essment		Implementation Milestones
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the following activities:
				to be implemented <del>by</del> <b>post</b> November 2023		
	<b>12.</b> CREV	Credit Event	Adaptation Required	Planned to be implemented by <b>post</b> November 2023.		
	13. DFLT	Bond Default	N/A	not relevant on the Finnish market		
	14. DLST	Trading Status: Delisted	N/A	not CA event hence N/A on the Finnish market		
	<b>15.</b> DRAW	Drawing	N/A	not relevant on the Finnish market		
	16. DSCL	Disclosure	Implemented	implemented as a part SRD II requirements		
	17. DTCH	Dutch Auction	Adaptation Required	Planned to be implemented <b>post</b> November 2023		
	18. EXOF	Exchange	Implemented	EXOF CHOS is not used in Finland		
	<b>19.</b> EXTM	Maturity Extension	Adaptation Required	Planned to be implemented <b>post</b> November 2023		
	20. INCR	Increase in Value	N/A	not relevant on the Finnish market		
	21. INFO	Information	Adaptation Required	to be implemented post Now 2023		
	22. INTR	Interest Payment	Implemented	INTR CHOS not supported in Finland		
	23. LIQU	Liquidation Payment	Implemented	only CASH option possible and CHOS not supported on the Finnish market		
	24. MCAL	Full Call / Early Redemption	Implemented			
	25. OTHR	Other Event	Implemented	VOLU not supported		
	26. PARI	Pari-Passu	Implemented			
		Partial Redemption Without Pool Factor Reduction	Implemented			
	28. PINK	Payment in Kind	Implemented	OTHR option not supported		
	29. PLAC	Place of Incorporation	N/A	not relevant on the Finnish market		
	<b>30.</b> PPMT	Instalment Call	N/A	not relevant on the Finnish market		
	31. PRED	Partial Redemption With Pool Factor Reduction	Implemented			
	32. REDM	Final Maturity	Implemented			
	33. REDO	Redenomination	N/A	not relevant on the Finnish market		

AMI-	SeCo Standard		Feasibility Ass	essment		Implementation Milestones				
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the	ne follo	wing activities:		
	34. REMK	Remarketing Agreement	N/A	not relevant on the Finnish market						
	35. RHDI	Intermediate Securities Distribution	Implemented							
	36. SUSP	Trading Status: Suspended	N/A	not CA event hence N/A on the Finnish market						
	37. TEND	Tender / Acquisition / Takeover / Purchase Offer	Implemented	TEND CHOS not supported						
	38. TREC	Tax Reclaim	N/A							
	39. WTRC	Withholding Tax Relief Certification	N/A							
	40. WRTH	Worthless	Implemented							
						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		DD-MM-YYYY		
		/////////////				Internal Adaptation	Yes	No	n/a	
	Rounding rules	Harmonised rounding rules shall be applied for the calculation of cash payments and securities movements.				M6: Adaptation started by 01/01/2022		DD-MM-YYYY		
4						M7: Adaptation completed by 30/06/2022		DD-MM-YYYY		
			and securities movements.				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		
	Rounding rule no.	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	Currently cash payments are rounded according to standard rounding (default option). The CSD system also supports round down for cash payments. The default rounding option will be changed to be round down for cash payments in Q3 2023.						
	Rounding rule no. 2	For securities movements, the securities amount should be rounded down to the nearest full unit.	Implemented							

AMI-	SeCo Standard		Feasibility Ass	essment		Implementation Milestones			
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:	
	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).	Implemented						
	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).	Implemented						
	-	-				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	
		Issuer CSDs and Investor CSDs				M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
		shall support the processing of		EFI's regulation has been		M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	
		corporate actions where the underlying security has a fixed		updated in April 2020 to accept bonds with positive		Internal Adaptation	Yes	No	n/a
5	Negative cash	negative interest rate or a floating rate coupon. Any	Implemented	interests only, or in case of a floating rate coupon there		M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
5	flows	negative interest shall result in a	Implemented	must be a floor of zero or		M7: Adaptation completed by 30/06/2022		DD-MM-YYYY	
		cashflow from the Investor to the Issuer which shall be		above (which must be stated in the terms and		M8: Internal testing started by 01/07/2022		DD-MM-YYYY	
		processed using the Interest		conditions of the security).		M9: Internal testing complete by 02/12/2022		DD-MM-YYYY	
		Payment (INTR) event.				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	

AMI-	SeCo Standard		Feasibility Ass	essment		Implementation Milestones				
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the transmission of transmission of the transmission of transmission of transmission of transmission of the transmission of tra	ne follo	owing activities:		
	floating interest rate, i Investor to the Issuer applicable to CSDs a and Investor CSD. If a positive interest rate, floor of zero or above the security), so that i	I negative interest rate, or with a may result in a payment from the of the security. The Standard is cting in their role as both Issuer CSD a CSD accepts only securities with a or with a floating rate coupon with a (fixed in the terms and conditions of negative cash payments do not is deemed to comply with this								
						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		
				Following business day is the default option in event		M4: Documentation completed by 31/12/2021		DD-MM-YYYY		
		If the payment date of a corporate action falls on a non- business day (in the country of the currency in which the payment is due), the payment		set up and used for majority		M5: Detailed external communication by 31/12/2021		DD-MM-YYYY		
			Implementatio n Started	of the bonds. Other business day rules are also		Internal Adaptation	Yes	No	n/a	
	Business day rule			supported. Documentation such as EFi's Regulation, Market Practice and Service Description to be updated to be in line with the final proposal of SCoRe standard on the usage of business days conventions.		M6: Adaptation started by 01/01/2022		DD-MM-YYYY		
6						M7: Adaptation completed by 30/06/2022		DD-MM-YYYY		
		shall be made on the next business day.				M8: Internal testing started by 01/07/2022		DD-MM-YYYY		
		Musiness udy.				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		
	at the end of day on r payment date falls on of the currency in whi shall be made on the conditions of the secu requirements stipulati would fall in the follow made in the same mod	e always calculated on the positions ecord date. In the event that the a non-business day in the country ch the payment is due, the payment next business day. The terms and with the terms and ing that if the next business day ving month, the payment needs to be onth (with the payment day being a original payment date).								
						Analysis and Communication	Yes	No	n/a	
7	Securities amount data	Securities amount data shall be defined using nominal value for	Implemented			M1: Analysis started by 30/06/2020		DD-MM-YYYY		
	uala	debt instruments (FAMT) and				M2: Initial communication by 01/03/2021		DD-MM-YYYY		

AMI-SeCo Standard		Feasibility Assessment			Implementation Milestones				
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	owing activities:	
	-	units for non-debt instruments (UNIT).				M3: Analysis completed by 31/07/2021		DD-MM-YYYY	
		(UNIT).				M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
						M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	
						Internal Adaptation	Yes	No	n/a
						M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
						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	
						M13: Standard implemented by 20/11/2023		DD-MM-YYYY	
_	should be applied on	a pan-European basis.				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	
		Corporate action cash proceeds				M3: Analysis completed by 31/07/2021		DD-MM-YYYY	
		shall be distributed as early as possible, but no later than 12				M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
		noon, on the corporate action payment date. For any corporate				M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	
		action event involving a partial				Internal Adaptation	Yes	No	n/a
	_	or full redemption, the cash proceeds should be made				M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
8	Payment time	available by the Issuer CSD at	Implemented			M7: Adaptation completed by 30/06/2022		DD-MM-YYYY	
		the same time as the processing of the partial or full redemption				M8: Internal testing started by 01/07/2022		DD-MM-YYYY	
		on the payment date so that relevant parties are				M9: Internal testing complete by 02/12/2022		DD-MM-YYYY	
		compensated/paid in a timely				Testing and Implementation	Yes	No	n/a
		fashion for the partial or full redemption.				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	

AMI-	SeCo Standard		Feasibility Ass	essment		Implementation Milestones			
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the	ne follo	owing activities:	
	Payment time for government bonds	For government bonds issued in domestic CSDs cash proceeds are paid no later than open for business of the payment system ( <del>i.e. 07:00 for TARGET2</del> ).	Adapation started	Proposals for the payment deadline have been communicated to the market. Once the deadline has been decided relevant documents will be updated and communicated.					
	Payment time for corporate bonds	For corporate bonds, the current minimum requirement is that cash proceeds be distributed no later than noon in the time zone of the Issuer CSD (consistent with existing CAJWG Standards). In line with recent improvements in market infrastructure in Europe (e.g. through the introduction of T2S) there are opportunities to improve the current latest time by which payments should be made with a latest cut-off time of 9:30 CET already feasible in many markets.	Adapation started	Proposals for the payment deadline have been communicated to the market. Once the deadline has been decided relevant documents will be updated and communicated.					
						Analysis and Communication	Yes	No	n/a
		In the event that an issuer,				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	
		issuer agent, or Issuer CSD				M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	
		cannot process a Corporate Action on the previously		Planned to be implemented <b>post</b> November 2023.		Internal Adaptation	Yes	No	n/a
9	Notification of	announced Payment Date, then all Account Servicers shall	Adaptation			M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
9	processing status	inform Account Owners about	Required			M7: Adaptation completed by 30/06/2022		DD-MM-YYYY	
		the delay as soon as possible and based on information		see also No 15		M8: Internal testing started by 01/07/2022		DD-MM-YYYY	
		received from higher up the				M9: Internal testing complete by 02/12/2022		DD-MM-YYYY	
		custody chain.				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	
	When a Corporate Action cannot be processed on the previously announced Payment Date. Issuers and their respective agents shall be responsible for providing information to the Issuer CSD on the reasons for the delay								

AMI-	AMI-SeCo Standard		Feasibility Assessment			Implementation Milestones			
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the term of	ne follo	owing activities:	
	message containing t a mandatory basis fro Intermediaries shall p	he Corporate Action. A notification this information shall be provided on om the Issuer CSD to its clients. bass on the notification message chain to ensure all impacted parties elay.							
	-	-				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	
				Blocking method is in place		M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
				and used in all mandatory		M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	
		For all Mandatory with Choice and Voluntary CA events		with choice and voluntary events.		Internal Adaptation	Yes	No	n/a
10	Blocking of	involving a debit of securities,	Adaptation	evento.		M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
10	securities	the Issuer CSD and all relevant intermediaries shall ensure that	required	Blocking indicator will be		M7: Adaptation completed by 30/06/2022		DD-MM-YYYY	
		the elected security position is subject to blocking.		included in a CA notification message by November 2023.		M8: Internal testing started by 01/07/2022		DD-MM-YYYY	
	subj					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	
	should be separated elected Underlying 3 Intermediaries. Accu- harmonised set of O requires the blockin a period of time in w prevented from bein Account Servicers s notification messag will be blocked. A "I shall be applied. Blocking of securiti following criteria ard 1. The CA event par with Choice (CHOS) 2. The option result. In the case of debt i	es on which an election is made d accounting-wise from non- Securities by the (I)CSD and all ordingly there shall be a CA events where participation og of securities (blocking refers to which an investor's securities are ng accessed). On this basis, shall include an indicator in the CA te to identify if a security position Follow-the-Issuer CSD" principle es should take place when the e met simultaneously: ticipation type is either Mandatory 0 or Voluntary (VOLU) s in a debit of a security position instruments, the following CA on combinations are subject to							
	CA Event	Participation Type (Mandatory / Voluntary)							

AMI-S	SeCo Standard		Feasibility Ass	essment		Implementation Milestones
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the following activities:
	BIDS	VOLU	Adaptation Required	Blocking method is in place and used in all mandatory with choice and voluntary events. Same blocking method will be applied to all CA events which are implemented in the CSD system in the future. Adaptation is required for implementing the CA event, not blocking. See the clarifications in standards 2 and 3		
	BPUT	VOLU	N/A			
	CERT	CHOS	N/A			
	CONS	VOLU	Adaptation Required	Event exists already but the content is not aligned with SCoRe standards. To be enhanced by Nov 2023 See the clarifications in standards 2 and 3		
	DSCL	VOLU	Implemented	The event has been implemented according to SRDII, no blocking required		
	DTCH	VOLU	Adaptation Required	Blocking method is in place and used in all mandatory with choice and voluntary events. Same blocking method will be applied to all CA events which are implemented in the CSD system. Adaptation is required for implementing the CA event, not blocking. See the clarification in standards 2 and 3		
		VOLU	Implemented			
	EXOF	CHOS	N/A			
	EXTM	CHOS	N/A			
	INTR	CHOS	N/A			
	LIQU	CHOS	N/A			
	MCAL	CHOS	N/A			

AMI-S	SeCo Standard		Feasibility Ass	sessment		Implementation Milestones			
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the	ne follo	owing activities:	
	OTUP	CHOS	N/A						
	OTHR	VOLU	N/A						
	REDM	CHOS	N/A						
	TEND	VOLU	Implemented						
	-	-		_		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		DD-MM-YYYY	
						Internal Adaptation	Yes	No	n/a
	Availability of	Account Servicers shall ensure that a Corporate Action event				M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
11	default options	that a Corporate Action event notification message identifies the default option for that event.	Implemented			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	
						M13: Standard implemented by 20/11/2023		DD-MM-YYYY	
	events that have mor	Id be present in all Corporate Action e than one option. The default option suer CSD must be transmitted he custody chain.				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	
		All fees (e.g. solicitation fees,				M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
	Handling of fees	consent fees) to be credited / debited as a result of		The CSD has no role in		M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	
12	for meeting related CA events	participation in an event shall be	N/A	processing of fees in meeting related CA events		Internal Adaptation	Yes	No	n/a
		confirmed via a CA confirmation message.				M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
						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	

AMI-S	SeCo Standard		Feasibility Ass	essment		Implementation Milestones			
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the	ne follo	owing activities:	
	<u>.</u>					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	
	for the handling of sol accrued as a result of	ould support harmonised procedures licitation fees and consent fees participation in a meeting related confirmed via a CA Confirmation							
						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	
		A pre-advice message shall be				M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
						M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	
	Reversal of CA movements	issued in advance of any reversal of a CA. In case of a		to be implemented post Nov 2023		Internal Adaptation	Yes	No	n/a
12		cash reversal, the pre-advice	Adaptation			M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
13		shall be sent sufficiently in advance of the reversal so that	Required			M7: Adaptation completed by 30/06/2022		DD-MM-YYYY	
		recipients have adequate time		see also No 15		M8: Internal testing started by 01/07/2022		DD-MM-YYYY	
		for cash management.				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	
	the recipient of the C	shall send a reversal the reversal is processed to allow A payment sufficient time to pre-fund proceeds before the reversal takes							
		To process payment in currencies not eligible in the				Analysis and Communication	Yes	No	n/a
		settlement system, the CSD		The roles and responsibilities of EFi and		M1: Analysis started by 30/06/2020		DD-MM-YYYY	
	Processing of	must instruct the cash correspondent to debit the	Implementatio	its clients will be updated in		M2: Initial communication by 01/03/2021		DD-MM-YYYY	
14	foreign currency CA payments	account of the paying agent and	n Started	EFi regulation. EFi should ensure that it has control		M3: Analysis completed by 31/07/2021		DD-MM-YYYY	
		to pay the funds to an account of the security holder. The CSD		over the corporate action		M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
		must send the corporate action confirmation to the security		payment.		M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	

AMI-SeCo Standard		Feasibility Ass	sessment		Implementation Milestones				
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of t	he foll	owing activities:	
	<u>.</u>	holder only upon receipt of the				Internal Adaptation	Yes	No	n/a
		confirmation from the cash correspondent that the cash has				M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
		been transferred successfully.				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	
						M13: Standard implemented by 20/11/2023		DD-MM-YYYY	
	currency not eligible i	urities paying cash proceeds in a in the settlement system, the CSD a process to handle payments in that				Analysis and Communication	Yes	No	n/a
						M1: Analysis started by 30/06/2020 M2: Initial communication by 01/03/2021			
						M3: Analysis completed by 31/07/2021			
						M3. Analysis completed by 31/07/2021 M4: Documentation completed by 31/12/2021			
						M5: Detailed external communication by 31/12/2021			
						Internal Adaptation	Yes	No	n/a
	ISO 20022	Account Servicers shall have		missing message types are		M6: Adaptation started by 01/01/2022			
15	messages for corporate actions	the capability to support ISO 20022 messages for the		related to reversal of CA event that is to be		M7: Adaptation completed by 30/06/2022		DD-MM-YYYY	
	corporate actions	processing of corporate actions.		implemented post Nov 2023		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	
	Message Name	Message Identifier							
	Corporate Action Notification	seev.031	Implemented						
	Corporate Action Event Processing Status Advice	seev.032	Adaptation Required	implementation of message is planned post Nov 2023 see also No 9					

AMI-S	eCo Standard		Feasibility Ass	essment		Implementation Milestones
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the following activities:
	Corporate Action Instruction	seev.033	Implemented			
	Corporate Action Instruction Status Advice	seev.034	Implemented			
	Corporate Action Movement Preliminary Advice	seev.035	Implemented			
	Corporate Action Movement Confirmation	seev.036	Implemented			
	Corporate Action Movement Reversal Advice	seev.037	Adaptation Required	implementation of message is planned post Nov 2023 see also No 13, 15,		
	Corporate Action Cancellation Advice	seev.039	Implemented			
	Corporate Action Instruction Cancellation Request	seev.040	Implemented			
	Corporate Action Instruction Cancellation Request Status Advice	seev.041	Implemented			
	Corporate Action Instruction Statement Report	seev.042	Implemented			
	Corporate Action Movement Preliminary Advice Cancellation Advice	seev.044	Adaptation Required	implementation of message is planned post Nov 2023 see also 13, 15		
	Meeting Notification	seev.001	Implemented			
	Meeting Cancellation	seev.002	Implemented			
	Meeting Entitlement Notification	seev.003	Implemented			
	Meeting Instruction	seev.004	Implemented			
	Meeting Instruction Cancellation Request	seev.005	Implemented			
	Meeting Instruction Status	seev.006	Implemented			

AM	AMI-SeCo Standard		Feasibility Assessment			Implementation Milestones		
No.	Name of Standard	f Standard Standard Standard Adaptation Pescription of Changes Required? Required		Legal Barrier Identified?	Please indicate the expected date of completion of the following activities:			
	Meeting Vote Execution Confirmation	seev.007	Implemented					
	Meeting Result Dissemination	seev.008	Implemented					