

Corporate Actions Adaptation Plan

Nasdaq CSD SE

Activity	Corporate Actions
Plan submitted by	Nasdaq CSD SE
NSG	Estonia, Latvia and Lithuania
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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The Adaptation Plan Table (section 2) outlines the current state of the CA functionalities within the Nasdaq CSD system and usage by Nasdaq CSD market participants. Most of the ISO 20022 messages are implemented by Nasdaq CSD. Some key data elements specified in the AMI-SeCo Standards for Corporate Actions are not used today and shall be enabled. There is no use case for some of the corporate action events listed in the AMI-SeCo Standards for Corporate Actions, therefore extra developments would be made only upon having appropriate market practice and market requests on additional event types. At the moment there is no intention to implement the missing events as there is no market practice and demand from the market.

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

2 Adaptation Plan Table

	AM	I-SeCo Standard		Feasibility Assessmen	t	Implementation Mileston	es		
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:	
	Harmonised	The Business Processes & Workflows				Analysis and Communication	Yes	No	n/a
	business process and workflows per	and Key Data Elements are described in the following sections of the AMI-				M1: Analysis started by 30/06/2020		DD-MM-YYYY	
	CA event	SeCo Corporate Action Standards				M2: Initial communication by 01/03/2021		DD-MM-YYYY	
		document. Please refer to Standards 1A to 1H below:				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
						M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
1						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	
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.							
nation	Business Processes & Workflows	Key Data Elements							
	1a. Notify [ca.1.01]	Table 1	Adaptation Required	Some key data elements					
onal Info	1b. Update [ca.1.02]	Table 1	Adaptation Required	are not used currently					
Additior	1c. Cancel [ca.1.03]	Table 2	Implemente d						
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.							
ional Infor	Business Processes &	Key Data Elements							

	AM	II-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 following activities:
	Workflows					
	2a. Instruction [ca.2.01]	Table 3	Implemente d			
	2b. Instruction Status Advice [ca.2.02]	Table 4	Implemente d			
	2c. Instruction Cancellation Request [ca.2.03]	Table 5	Adaptation Required	Some key data elements are not used currently		
	2d. Instruction Cancellation Request Status Advice [ca.2.04]	Table 6	Implemente d			
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.				
uo	Business Processes & Workflows	Key Data Elements				
Information	3a. Movement Preliminary Advice [ca.3.01]	Table 7	Implemente d			
Additional	3b. Movement Preliminary Advice Cancellation [ca.3.02]	Table 8	Adaptation Required	Respective ISO standard message would have to be implemented		
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				
tion	4a. CA Event Processing Status Advice[ca.4.01]	Table 9	Adaptation Required	Respective ISO standard message would have to be implemented		
Information	4b. Movement Confirmation [ca.4.02]	Table 10	Implemente d			
Additional	4c. Payment Confirmation [ca.4.03]	Table A and B	Not applicable as Nasdaq CSD is			

	AM	I-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 following activities:
			neither collateral taker or collateral giver			
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.				
	Applicable Business Processes & Workflows	Key Data Elements				
	5a. Movement Preliminary Advice [ca.5.01]	Table 7	Implemente d			
Additional Information	5b. Payment Confirmation [ca.5.02]	Table A and B	Not applicable as Nasdaq CSD is neither collateral taker or collateral giver			
Addition	5c. Movement Reversal Advice [ca.5.03]	Table 11	Implemente d			
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	Adaptation Required	Some key data elements are not used currently		
Information	1b. Meeting Cancellation [me.1.02]	Table 13	Implemente d			
Additional I	1c. Meeting Entitlement Notification [me.1.03]	Table 14	Implemente d			
1G	Meeting Event	The Account Owner (or the party holding the right to vote) shall instruct				

	AM	I-SeCo Standard		Feasibility Assessment		Implementation Mileston	es		
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the	e follo	wing activities:	
	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 15	Adaptation Required						
io	2b. Meeting Instruction Cancellation Request [me.2.02]	Table 17	Adaptation Required	Respective ISO standard messages would have to be implemented as part of					
Informat	2c. Meeting Instruction Status [me.2.03]	Table 16	Adaptation Required	Shareholders Rights Directive II compliance (deadline September 3, 2020)					
Additional	2d. Meeting Vote Execution Confirmation [me.2.04]	Table 18	Adaptation Required	2020)					
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	Implemente d						
	Provision of data	The corporate action notification, as				Analysis and Communication	Yes	No	n/a
	necessary for calculation of	communicated by the Account Servicer, shall include the necessary				M1: Analysis started by 30/06/2020		DD-MM-YYYY	
	proceeds	data elements required to calculate the cash and / or securities				M2: Initial communication by 01/03/2021		DD-MM-YYYY	
		movements.				M3: Analysis completed by 31/07/2021		DD-MM-YYYY	
						M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
2						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	

		AMI-SeCo Standard		Feasibility Assessmen	t	Implementation Milest	ones		
ľ	Name of Standar	d Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of	the follo	owing activities:	
						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	
E	Business Proces	ses & Workflows							
E	CA Event ID	CA Event Name							
1	1. ACTV	Trading Status: Active	Implemente d						
2	2. BIDS	Repurchase Offer / Issuer Bid / Reverse Rights	Implemente d						
3	3. BMET	Bond Holder Meeting	Implemente d						
4	4. BPUT	Put Redemption	Implemente d						
5	5. BRUP	Bankruptcy	Implemente d						
e	6. CAPI	Capitalisation	Adaptation Required	Corporate Action Event Type and event related processing functionality are not available in the CSD system. Nasdaq CSD will implement CA event when there is demand for it from the market.					
7	7. CERT	Non-US TEFRA D Certification							
8	B. CHAN	Change	Implemente d						
9	9. CLSA	Class Action / Proposed Settlement	Adaptation Required	Corporate Action Event Type and event related processing functionality are not available in the CSD system. Nasdaq CSD will implement CA event when there is demand for it from the market.					
1	10. CMET	Court Meeting	Adaptation Required	Part of Shareholders Rights Directive II compliance (deadline September 3, 2020)					
1	11. CONS	Consent	Adaptation	Will be implemented in					

	AM	I-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 following activities:
			Required	Q1 2020.		
	12. CREV Cr	edit Event	Implemente d			
	13. DFLT Bo	ond Default	Implemente d			
	14. DLST Tra	ading Status: Delisted	Implemente d			
	15. DRAW Dr	awing	Adaptation Required	Corporate Action Event Type and event related		
	16. DSCL Dis	sclosure	Adaptation Required	processing functionality are not available in the CSD system. Nasdaq		
	17. DTCH Du	utch Auction	Adaptation Required	CSD will implement CA event when there is demand for it from the market.		
	18. EXOF Ex	change	Implemente d			
	19. EXTM Ma	aturity Extension	Implemente d			
	20. INCR Inc	crease in Value	Implemente d			
	21. INFO Inf	formation	Implemente d			
	22. INTR Int	erest Payment	Implemente d			
	23. LIQU Lic	quidation Payment	Implemente d			
	24. MCAL Fu	II Call / Early Redemption	Implemente d			
	25. OTHR Ot	her Event	Implemente d			
	26. PARI Pa	ari-Passu	Implemente d			
	D	artial Redemption Without Pool Factor	Implemente d			
	28. PINK Pa	ayment in Kind	Adaptation Required	Corporate Action Event Type and event related		
	29. PLAC Pla	ace of Incorporation	Adaptation Required	processing functionality are not available in the CSD system. Nasdaq		
	30. PPMT Ins	stalment Call	Adaptation Required	CSD will implement CA event when there is demand for it from the market.		
	31. PRED Pa	artial Redemption With Pool Factor	Adaptation			

	AM	MI-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 following activities:
	R	Reduction	Required			
	32. REDM F	inal Maturity	Implemente d			
	33. REDO R	Redenomination	Implemente d			
	34. REMK R	Remarketing Agreement	Adaptation Required	Corporate Action Event Type and event related processing functionality are not available in the CSD system. Nasdaq CSD will implement CA event when there is demand for it from the market.		
	35. RHDI Ir	ntermediate Securities Distribution	Implemente d			
	36. SUSP T	Frading Status: Suspended	Implemente d			
		Fender / Acquisition / Takeover / Purchase Dffer	Implemente d			
	38. TREC 7	Fax Reclaim	Adaptation Required	Corporate Action Event Type and event related processing functionality are not available in the CSD system. Nasdaq CSD will implement CA event when there is demand for it from the market.		
	39. WTRC V	Withholding Tax Relief Certification	Adaptation Required	Corporate Action Event Type and event related processing functionality are not available in the CSD system. Nasdaq CSD will implement CA event when there is demand for it from the market.		
	40. WRTH V	Vorthless	Implemente d			

	AN	II-SeCo Standard		Feasibility Assessment		Implementation Mileston	es		
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:	
	Consistency of	Investor (I)CSDs and Custodians shall				Analysis and Communication	Yes	No	n/a
	information provided by Issuer	remit information on CA events in accordance with the information				M1: Analysis started by 30/06/2020		DD-MM-YYYY	
	CSDs, Investor	received from the Issuer (I)CSD. All CA				M2: Initial communication by 01/03/2021		DD-MM-YYYY	
	CSDs & Custodians	event types announced by the Issuer CSD must be supported by all Investor				M3: Analysis completed by 31/07/2021		DD-MM-YYYY	
		(I)CSDs / Custodians. All Issuer CSDs shall use corporate action event types				M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
		in a consistent manner.				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	
3						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	
	processed in a consis with the details speci there is consistency i individual CSD, and a below are in the scop	events listed in the table below shall be stent manner across Europe in accordance fied in Section 4 of this document, so that in the usage of event types both within an across different CSDs. The CA events listed be of the Standard. Please indicate for each aptations are required in order to adhere to							
	CA Event	CA Event Name							
	1. ACTV	Trading Status: Active	Implemente d						
		Repurchase Offer / Issuer Bid / Reverse Rights	Adaptation Required	Some option types and key data elements are not available.					
	3. BMET	Bond Holder Meeting	Adaptation Required	Some key data elements are not available.					
	4. BPUT	Put Redemption	Implemente d						
	5. BRUP	Bankruptcy	Implemente d						
	6. CAPI	Capitalisation	Adaptation Required	Corporate Action Event Type and event related processing functionality are not available in the					

	AN	/II-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 following activities:
				CSD system. Nasdaq CSD will implement CA event when there is demand for it from the market.		
	7. CERT	Non-US TEFRA D Certification				
	8. CHAN	Change	Implemente d			
	9. CLSA	Class Action / Proposed Settlement	Adaptation Required	Corporate Action Event Type and event related processing functionality are not available in the CSD system. Nasdaq CSD will implement CA event when there is demand for it from the market.		
	10. CMET	Court Meeting	Adaptation Required	Part of Shareholders Rights Directive II compliance (deadline September 3, 2020)		
		Consent	Adaptation Required	Will be implemented in Q1 2020.		
	12. CREV	Credit Event	Implemente d			
	13. DFLT	Bond Default	Implemente d			
	14. DLST	Trading Status: Delisted	Implemente d			
	15. DRAW	Drawing	Adaptation Required	Corporate Action Event Type and event related		
	16. DSCL	Disclosure	Adaptation Required	processing functionality are not available in the CSD system. Nasdaq		
	17. DTCH	Dutch Auction	Adaptation Required	CSD will implement CA event when there is demand for it from the market.		
	18. EXOF	Exchange	Implemente d			
	19. EXTM	Maturity Extension	Adaptation Required	Some option types and key data elements are not available.		
	20. INCR	Increase in Value	Implemente d			
	21. INFO	Information	Implemente d			
	22. INTR	Interest Payment	Adaptation	Some option types and		

	AN	/II-SeCo Standard		Feasibility Assessment	:	Implementation Milestones
No.	Name of Standard	Standard	Adaptation Required? Required	Description of Changes Required key data elements are	Legal Barrier Identified?	Please indicate the expected date of completion of the following activities:
	23. LIQU	Liquidation Payment	Adaptation Required	not available.		
	24. MCAL	Full Call / Early Redemption	Implemente d			
	25. OTHR	Other Event	Implemente d			
	26. PARI	Pari-Passu	Adaptation Required	Pari-Passu Date element is not available.		
	27. PCAL	Partial Redemption Without Pool Factor Reduction	Implemente d			
	28. PINK	Payment in Kind	Adaptation Required	Corporate Action Event Type and event related		
	29. PLAC	Place of Incorporation	Adaptation Required	processing functionality are not available in the CSD system. Nasdaq		
	30. PPMT	Instalment Call	Adaptation Required	CSD will implement CA event when there is demand for it from the market.		
		Partial Redemption With Pool Factor Reduction	Adaptation Required			
	32. REDM	Final Maturity	Implemente d			
	33. REDO	Redenomination	Implemente d			
	34. REMK	Remarketing Agreement	Adaptation Required	Corporate Action Event Type and event related processing functionality are not available in the CSD system. Nasdaq CSD will implement CA event when there is demand for it from the market.		
	35. RHDI	Intermediate Securities Distribution	Implemente d			
	36. SUSP	Trading Status: Suspended	Implemente d			
		Tender / Acquisition / Takeover / Purchase Offer	Implemente d			
	38. TREC	Tax Reclaim				
	39. WTRC	Withholding Tax Relief Certification				
	40. WRTH	Worthless	Implemente d			

	AM	II-SeCo Standard		Feasibility Assessmen	t	Implementation Mileston	es		
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:	
	Rounding rules	Harmonised rounding rules shall be				Analysis and Communication	Yes	No	n/a
		applied for the calculation of cash payments and securities movements.				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
						M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
4						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	
	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	Implemente d						
	Rounding rule no. 2	For securities movements, the securities amount should be rounded down to the nearest full unit.	Implemente d						
noitem	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).	Implemente d						
Additional Information	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	Implemente d						

AMI-SeCo Standard			Feasibility Assessme	nt	Implementation Milestor	nes			
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the second sec	he follo	owing activities:	
		rounding up, or rounding down, or truncation, of the ratio).							
	Negative cash	Issuer CSDs and Investor CSDs shall				Analysis and Communication	Yes	No	n/a
	flows	support the processing of corporate actions where the underlying security				M1: Analysis started by 30/06/2020		DD-MM-YYYY	
		has a fixed negative interest rate or a				M2: Initial communication by 01/03/2021		DD-MM-YYYY	
		floating rate coupon. Any negative interest shall result in a cashflow from				M3: Analysis completed by 31/07/2021		DD-MM-YYYY	
		the Investor to the Issuer which shall				M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
		be processed using the Interest Payment (INTR) event.				M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	
				Processing of negative cash flows are not		Internal Adaptation	Yes	No	n/a
			Adaptation	supported currently.		M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
5			Required	Nasdaq CSD will implement CA event		M7: Adaptation completed by 30/06/2022		DD-MM-YYYY	
				when there is demand		M8: Internal testing started by 01/07/2022		DD-MM-YYYY	
				for it from the market.		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	
				F	M12: External testing completed by 13/10/2023		DD-MM-YYYY		
						M13: Standard implemented by 20/11/2023		DD-MM-YYYY	
	Issuer of the security. in their role as both Is accepts only securitie floating rate coupon w terms and conditions	ult in a payment from the Investor to the The Standard is applicable to CSDs acting suer CSD and Investor CSD. If a CSD s with a positive interest rate, or with a vith a floor of zero or above (fixed in the of the security), so that negative cash ur, then the CSD is deemed to comply with							
	Business day rule	If the payment date of a corporate action falls on a non-business day (in				Analysis and Communication	Yes	No	n/a
		the country of the currency in which		Nasdaq CSD follows		M1: Analysis started by 30/06/2020		DD-MM-YYYY	
		the payment is due), the payment shall be made on the next business day.		T2S business days and opening hours.		M2: Initial communication by 01/03/2021		DD-MM-YYYY	
		be made on the next business day.		Payments can only be		M3: Analysis completed by 31/07/2021		DD-MM-YYYY	
				made then. The payment date rule is set		M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
6			Not applicable	in the terms of the issue		M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	
				and the issuer follows as specified in the terms of		Internal Adaptation	Yes	No	n/a
				the issue. Nasdaq CSD		M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
				executes the payment on the payment date as		M7: Adaptation completed by 30/06/2022		DD-MM-YYYY	
				specified by the issuer.		M8: Internal testing started by 01/07/2022		DD-MM-YYYY	
						M9: Internal testing complete by 02/12/2022		DD-MM-YYYY	

	AMI-SeCo Standard			Feasibility Assessmen	t	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:	
	-					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	
	end of day on record falls on a non-busines which the payment is next business day. Th not have operational business day would fa needs to be made in the being moved to prece	e always calculated on the positions at the date. In the event that the payment date ss day in the country of the currency in due, the payment shall be made on the ne terms and conditions of the security must requirements stipulating that if the next all in the following month, the payment the same month (with the payment day ede the original payment date).							
	Securities amount data	Securities amount data shall be defined using nominal value for debt				Analysis and Communication	Yes	No	n/a
		instruments (FAMT) and units for non- debt instruments (UNIT).				M1: Analysis started by 30/06/2020		DD-MM-YYYY	
		dest manuficition (ontri).				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
7			Implemente			M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
,			d			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	
	consistent usage of F equities. This Standa	actice for defining securities amount data is AMT for debt instruments and UNIT for rd builds upon the standard currently rkets and which should be applied on a							

AMI-SeCo Standard				Feasibility Assessment		Implementation Mileston	es		
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of th	ne follo	owing activities:	
	Payment time	Corporate action cash proceeds shall be distributed as early as possible, but				Analysis and Communication	Yes	No	n/a
		no later than 12 noon, on the				M1: Analysis started by 30/06/2020		DD-MM-YYYY	
		corporate action payment date. For any corporate action event involving a				M2: Initial communication by 01/03/2021		DD-MM-YYYY	
		partial or full redemption, the cash proceeds should be made available by				M3: Analysis completed by 31/07/2021		DD-MM-YYYY	
		the Issuer CSD at the same time as the				M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
		processing of the partial or full redemption on the payment date so				M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	
		that relevant parties are				Internal Adaptation	Yes	No	n/a
		compensated/paid in a timely fashion for the partial or full redemption.	Implemente			M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
8			d			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	
	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 (i.e. 07:00 for TARGET2).	Implemente d	CSD follows CAJWG market practice standards and payments for corporate bonds are done the latest at 12 p.m. and as soon as the payment system (Target 2 Securities) opens if the issuer or the issuer's agent has secured required cash.					
	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 10:30 already feasible in many markets.	Implemente d	CSD follows CAJWG market practice standards and payments for corporate bonds are done the latest at 12 p.m. and as soon as the payment system (Target 2 Securities) opens if the issuer or the issuer's agent has secured required cash.					

	AM	I-SeCo Standard		Feasibility Assessmer	ıt	Implementation Milestor	es		
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the second sec	ne follo	owing activities:	
	Notification of processing status	In the event that an issuer, issuer agent, or Issuer CSD cannot process a				Analysis and Communication	Yes	No	n/a
	proceeding etatue	Corporate Action on the previously				M1: Analysis started by 30/06/2020		DD-MM-YYYY	
		announced Payment Date, then all Account Servicers shall inform				M2: Initial communication by 01/03/2021		DD-MM-YYYY	
		Account Owners about the delay as soon as possible and based on				M3: Analysis completed by 31/07/2021		DD-MM-YYYY	
		information received from higher up				M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
		the custody chain.				M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	
						Internal Adaptation	Yes	No	n/a
			Adaptation	Respective ISO standard message		M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
9			Required	would have to be		M7: Adaptation completed by 30/06/2022		DD-MM-YYYY	
				implemented		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	
	shall be responsible for on the reasons for the Action. A notification r be provided on a man clients. Intermediaries	Date. Issuers and their respective agents or providing information to the Issuer CSD e delay in the processing of the Corporate message containing this information shall adatory basis from the Issuer CSD to its s shall pass on the notification message hain to ensure all impacted parties are							
	Blocking of	For all Mandatory with Choice and		-		Analysis and Communication	Yes	No	n/a
	securities	Voluntary CA events involving a debit of securities, the Issuer CSD and all				M1: Analysis started by 30/06/2020		DD-MM-YYYY	
		relevant intermediaries shall ensure that the elected security position is				M2: Initial communication by 01/03/2021		DD-MM-YYYY	
		subject to blocking.				M3: Analysis completed by 31/07/2021		DD-MM-YYYY	
						M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
10			Implemente d			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	

	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 t	he follo	owing activities:	
						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	
	be separated accound Securities by the (I)O there shall be a harm participation required refers to a period of are prevented from I Servicers shall inclu- message to identify "Follow-the-Issuer O Blocking of securities criteria are met simu 1. The CA event part Choice (CHOS) or VO 2. The option results In the case of debt in	ticipation type is either Mandatory with	Adaptation Required	An indicator in the CA notification message shall be implemented.					
	CA Event	Participation Type (Mandatory / Voluntary)							
	BIDS	VOLU	Implemente d						
	BPUT	VOLU	Implemente d						
	CERT	CHOS	Adaptation Required	Corporate Action Event Type and event related processing functionality are not available in the CSD system. Nasdaq CSD will implement CA event when there is demand for it from the market.					
	CONS	VOLU	Adaptation Required	Will be implemented in Q1 2020.					
	DSCL	VOLU	Adaptation Required	Corporate Action Event Type and event related processing functionality are not available in the CSD system. Nasdaq CSD will implement CA event when there is demand for it from the market.					

	АМ	I-SeCo Standard		Feasibility Assessment		Implementation Mileston	es	
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of th	e following activities:	
	DTCH	VOLU	Adaptation Required	Corporate Action Event Type and event related processing functionality are not available in the CSD system. Nasdaq CSD will implement CA event when there is demand for it from the market.				
	EXOF	VOLU	Implemente d					
		CHOS	Implemente d					
	EXTM	CHOS	Adaptation Required					
	INTR	CHOS	Adaptation Required	CHOS option is not available currently.				
	LIQU	CHOS	Adaptation Required	Nasdaq CSD will implement option when				
	MCAL	CHOS	Adaptation Required	there is demand for it from the market.				
	OTHR	CHOS	Adaptation Required					
		VOLU	Adaptation Required	VOLU option is not available currently. Nasdaq CSD will implement option when there is demand for it from the market.				
	REDM	CHOS	Adaptation Required	CHOS option is not available currently. Nasdaq CSD will implement option when there is demand for it from the market.				
	TEND	VOLU	Implemente d					
	Availability of default options	Account Servicers shall ensure that a Corporate Action event notification				Analysis and Communication	Yes No	n/a
	delault options	message identifies the default option				M1: Analysis started by 30/06/2020	D DD-MM-YYYY	
11		for that event.	Implemente			M2: Initial communication by 01/03/2021	D DD-MM-YYYY	
			d			M3: Analysis completed by 31/07/2021		
						M4: Documentation completed by 31/12/2021		
						M5: Detailed external communication by 31/12/2021	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 the	ne follo	owing activities:	
						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	
	that have more than o by the Issuer CSD mu custody chain.	d be present in all Corporate Action events one option. The default option as identified ist be transmitted unchanged through the					<u> </u>		
	Handling of fees for meeting related	All fees (e.g. solicitation fees, consent fees) to be credited / debited as a				Analysis and Communication	Yes	No	n/a
	CA events	result of participation in an event shall				M1: Analysis started by 30/06/2020		DD-MM-YYYY	
		be confirmed via a CA confirmation message.				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			
						Internal Adaptation	Yes	No	n/a
12			Adaptation			M6: Adaptation started by 01/01/2022			
			Required			M7: Adaptation completed by 30/06/2022			
						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			
						M11: Final external communication by 01/04/2023			
						M12: External testing completed by 13/10/2023		DD-MM-YYYY	
						M13: Standard implemented by 20/11/2023		DD-MM-YYYY	
	handling of solicitation	ould support harmonised procedures for the n fees and consent fees accrued as a result eeting related event, which shall be onfirmation message.							

AMI-SeCo Standard			Feasibility Assessmen	t	Implementation Mileston	es			
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:	
	Reversal of CA	A pre-advice message shall be issued				Analysis and Communication	Yes	No	n/a
	movements	in advance of any reversal of a CA. In case of a cash reversal, the pre-advice				M1: Analysis started by 30/06/2020		DD-MM-YYYY	
		shall be sent sufficiently in advance of the reversal so that recipients have				M2: Initial communication by 01/03/2021		DD-MM-YYYY	
		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		DD-MM-YYYY	
						Internal Adaptation	Yes	No	n/a
40			Implemente			M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
13			d			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	
_	payment sufficient tim proceeds before the r Processing of	To process payment in currencies not				Analysis and Communication	Yes	No	n/a
	foreign currency CA payments	eligible in the settlement system, the CSD must instruct the cash				M1: Analysis started by 30/06/2020		DD-MM-YYYY	
	er paymonto	correspondent to debit the account of				M2: Initial communication by 01/03/2021		DD-MM-YYYY	
		the paying agent and to pay the funds to an account of the security holder.				M3: Analysis completed by 31/07/2021		DD-MM-YYYY	
		The CSD must send the corporate				M4: Documentation completed by 31/12/2021		DD-MM-YYYY	
		action confirmation to the security holder only upon receipt of the				M5: Detailed external communication by 31/12/2021		DD-MM-YYYY	
		confirmation from the cash correspondent that the cash has been				Internal Adaptation	Yes	No	n/a
		transferred successfully.	Implemente			M6: Adaptation started by 01/01/2022		DD-MM-YYYY	
14			d			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	
									n/a
						Testing and Implementation	Yes	No	n/a
							Yes	No DD-MM-YYYY	
						Testing and Implementation	-		
						Testing and Implementation M10: External testing started by 05/12/2022		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 the second sec	ne follo	owing activities:		
	not eligible in the settl	urities paying cash proceeds in a currency lement system, the CSD should put in a ndle payments in that currency.								
	ISO 20022	Account Servicers shall have the				Analysis and Communication	Yes	No	n/a	
	messages for corporate actions	capability to support ISO 20022 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		
						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	
15						M6: Adaptation started by 01/01/2022		DD-MM-YYYY		
15						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		
	Message Name	Message Identifier								
	Corporate Action Notification	seev.031	Implemente d							
	Corporate Action Event Processing Status Advice	seev.032	Adaptation Required	Respective ISO standard message would have to be implemented						
	Corporate Action Instruction	seev.033	Implemente d							
	Corporate Action Instruction Status Advice	seev.034	Implemente d							
	Corporate Action Movement Preliminary Advice	seev.035	Implemente d							
	Corporate Action Movement Confirmation	seev.036	Implemente d							
	Corporate Action Movement Reversal Advice	seev.037	Implemente d							

	AM	I-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 following activities:
	Corporate Action Cancellation Advice	seev.039	Implemente d			
	Corporate Action Instruction Cancellation Request	seev.040	Implemente d			
	Corporate Action Instruction Cancellation Request Status Advice	seev.041	Implemente d			
	Corporate Action Instruction Statement Report	seev.042	Adaptation Required	Respective ISO		
	Corporate Action Movement Preliminary Advice Cancellation Advice	seev.044	Adaptation Required	standard message would have to be implemented		
	Meeting Notification	seev.001	Implemente d			
	Meeting Cancellation	seev.002	Implemente d			
	Meeting Entitlement Notification	seev.003	Implemente d			
	Meeting Instruction	seev.004	Adaptation Required	Personalities ISO		
	Meeting Instruction Cancellation Request	seev.005	Adaptation Required	Respective ISO standard message would have to be implemented as part of		
	Meeting Instruction Status	seev.006	Adaptation Required	Shareholders Rights Directive II compliance (deadline September 3, 2020)		
	Meeting Vote Execution Confirmation	seev.007	Adaptation Required			
	Meeting Result Dissemination	seev.008	Implemente d			