

SCoREBOARD

Corporate Actions – H1 2023

Finnish NSG

Background

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

What is SCoRE?

SCoRE defines common rules for managing collateral in Europe. These rules will replace the fragmented legacy standards, structural constraints and complex and diverse market practices that exist across Europe today. Implementation of SCoRE should remove operational impediments to the availability, usage and mobility of collateral. Market participants in AMI-SeCo have committed to implementing the SCoRE Rulebook, with the first set of rules due to be implemented by April 2024. Their implementation efforts are regularly monitored by AMI-SeCo which facilitates an active dialogue with market participants on issues related to the clearing and settlement of securities and to collateral management.

National stakeholder groups (NSGs) are coordination forums that have been established in the markets covered by the AMI-SeCo to support the implementation of the Single Collateral Management Rulebook for Europe (SCoRE).

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

Introduction

This summary report presents the results of the H1 2023 monitoring exercise conducted by the Finnish NSG with the involvement among the following stakeholders:

9 entities are monitored in the Finnish market

- 1 CSD – Euroclear Finland
- 4 Custodians
- 4 Issuers

The report focuses on the milestones to be met by the time the survey closed. In this monitoring exercise, participants were expected to have achieved all the milestones up to Milestone 9 inclusive “Internal testing Complete for SCoRE” (with a deadline of 10 March 2023) as described in section 3 below.

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

1 Key takeaways

The Finnish market is behind schedule overall as a result of the uncertainty surrounding Euroclear Finland's Adaptation Plan

The preparations of the Finnish market have been impacted by Euroclear Finland's updated adaptation plan as well as its set T2S migration date in September 2023. This puts timely compliance with the Standards at risk and, thus, the Finnish market can be considered behind schedule overall. The Finnish NSG will follow-up on this matter in view of achieving full clarity as soon as possible.

Figure 1
Summary of the monitoring exercise

	 Response Rate	 Implementation Status of the standards	Are all milestones 1 to 9 inclusive achieved?	Will the last milestone 13 be implemented on time (i.e. by 08 April 2024)?
Custodians	100%	Implemented 43.4% Implementation started 16.5% Analysis started 23.7% Analysis not started 0.11% Non applicable standards 16.1% Replies not submitted 0%	Average % of milestones achieved 58%	% of custodians on time 75%
Issuers	75%	Aware of obligations 43.1% Not aware of obligations 31.8% Replies not submitted 25%	NA (milestones irrelevant for issuers)	NA
CSD - Euroclear Finland	Survey submitted	Implemented 54.8% Implementation started 1.70% Analysis started 16.1% Analysis not started 0% Non applicable standards 27.2% Replies not submitted 0%	No	12/29

CSD – Euroclear Finland

Euroclear Finland implementation of the corporate action standard is not on schedule

Euroclear Finland has reported that the roadmap for joining T2S in September 2023 is the current priority for the Finnish market. All other priorities are being analysed in proportion to the T2S roadmap and it is not expected that all outstanding compliance issue will be resolved by the April 2024 deadline.

Custodians

Custodians may be impacted by Euroclear Finland's replanning exercise

Finnish custodians reported compliance with several of the Standards. However, as these standards require that all relevant actors in the market are ready, there are interdependent risks between institutions which may impact custodians' ability to fully comply with all applicable Standards on schedule. This matter will be closely monitored.

Issuers

The FIN NSG is planning to get more issuers involved in the SCoRE monitoring process

Issuers participated in the H1 2023 monitoring exercise, however, there is still need to wider participation among issuers. The FIN NSG tries to proceed with the issue in the next monitoring rounds.

NCB

The Bank of Finland adoption of the SCoRE Standards is dependent on Euroclear Finland's implementation

The Bank of Finland implementation of the SCoRE Standards for Corporate Actions for its collateral management activities as of the go-live of the ECMS is dependent on Euroclear Finland's implementation of the standards.

2 Compliance level with the standards

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

Figure 2

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



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

Table 1

Compliance level with the standards by each entity type

STANDARD	Custodians	Issuers	CSD - Euroclear Finland
1A: Notification	75%	25%	Y
1B: Instruction	73%		B
1C: Advise	71%		Y
1D: Confirmation	68%		Y
1E: Reversal	33%		Y
1F: Meeting Notification	97%	25%	B
1G: Meeting Instruction	97%		B
1H: Meeting Results	92%		B
2: Calculation of Proceeds	77%	50%	Y
3: Consistency of Information	66%	50%	Y
4: Rounding Rule 1	100%	50%	B
4: Rounding Rule 2	100%	50%	B
4: Rounding Rule 3	100%	50%	B
4: Rounding Rule 4	75%	50%	G
4: Rounding Rule 5	100%	50%	B
5: Negative Cash Flows	100%	25%	B
6: Business Day Rule		50%	G
7: Securities Amount Data Rule 1		75%	B
7: Securities Amount Data Rule 2		75%	B
7: Securities Amount Data Rule 3		75%	B
7: Securities Amount Data Rule 4		75%	B
8: Payment Time Rule 1		50%	B
8: Payment Time Rule 2		75%	B
8: Payment Time Rule 3		50%	B
8: Payment Time General Principle 3		25%	B
9: Processing Status	75%	50%	Y
10: Rule 1	75%		B
10: Rule 2	50%		B
10: Rule 3	25%		G
11: Default Option	100%	75%	B
12: Handling of Fees	50%		N/A
13: Reversal	50%	50%	Y
14: Foreign Currency			G
15: ISO 20022 Messaging	62%		Y

Notes:

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

3 Progress towards the milestones

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

The milestones facilitate consistent implementation across markets (given the long-term efforts that are needed) and avoids issues remaining undetected until the deadline of 8 April 2024 to achieve compliance and implementation of the standards.

Table 2
Milestones identified by AMI-SeCo

Milestone	Description	Date
M1	Analysis Started: Have you commenced an in-depth analysis of all applicable SCoRE Standards in order to identify and document all the changes required to internal processes and procedures in order to comply with the SCoRE Standards?	30/06/2020
M2	Initial Communication: Has initial high-level communication with external stakeholders on the changes introduced by SCoRE commenced?	01/03/2021
M3	Analysis Completed: Have you completed an in-depth analysis of all applicable SCoRE Standards?	31/07/2021
M4	Documentation Completed: Have you documented all the internal processes and procedures which need to be adapted in order to comply with the SCoRE Standards?	31/12/2021
M5	Detailed External Communication: Has detailed communication started regarding (i) upcoming changes in business processes, (ii) messaging formats and usage guidelines (in the case of new messages based on non-registered latest drafts by SWIFT) and (iii) planned testing activities been provided to users?	31/12/2021
M6	SCoRE Adaptation Started: Have you started to adapt/develop the processes and procedures in order to comply with the SCoRE Standards?	01/01/2022
M7	SCoRE Adaptation Complete: Have you completed the necessary adaptations/developments for the processes and procedures in order to comply with the SCoRE Standards?	30/06/2022
M8	Internal Testing Started for SCoRE: Have you started to test the changes to your internal processes and procedures which have been introduced in order to comply with the SCoRE Standards?	01/07/2022
M9	Internal Testing Complete for SCoRE: Have you completed the necessary internal testing?	10/03/2023
M10	External Testing Started for SCoRE: Are you in a position to test the changes introduced in order to comply with the SCoRE Standards with your user community (i.e. CSD participants / Collateral Givers and Collateral Takers in the context of the Standards applicable to TPAs)?	22/05/2023
M11	Final External Communication on SCoRE: has final communication to users been provided (i.e. updated user guide to reflect the changes implemented, final message usage guidelines for A2A communication) related to the SCoRE Standards?	22/05/2023
M12	External Testing Completed for SCoRE: Is the testing of the changes introduced in order to comply with the SCoRE Standards with your user community completed (i.e. CSD participants / Collateral Givers and Collateral Takers in the context of the Standards applicable to TPAs)?	16/02/2024
M13	SCoRE Standards Implemented: have the SCoRE Standards been implemented?	08/04/2024

The current H1 2023 monitoring exercise focuses on milestones 1 to 9 given that Milestone 9 “Internal testing Complete for SCoRE” (with a deadline of 10 March 2023) was meant to have been achieved by the time the survey closed.

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

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

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

Table 3
Entities' expectation of achieving the milestones at the set dates

	Custodians	CSD - Euroclear Finland
Milestone 1 June 2020	100%	Yes
Milestone 2 March 2021	75%	Yes
Milestone 3 July 2021	75%	Yes
Milestone 4 December 2021	75%	Yes
Milestone 5 December 2021	50%	Yes
Milestone 6 January 2022	50%	12/29
Milestone 7 June 2022	25%	12/29
Milestone 8 July 2022	50%	12/29
Milestone 9 March 2023	25%	12/29
Milestone 10 May 2023	75%	12/29
Milestone 11 May 2023	75%	12/29
Milestone 12 February 2024	75%	12/29
Milestone 13 April 2024	75%	12/29

4 Concluding remarks

There is a delay in implementing the milestones which seems to jeopardise compliance with all the standards by April 2024. Despite the numerous uncertainties related to the milestones, the Finnish market is moving in the right direction.

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