

# SCoREBOARD

## Billing Processes – H2 2022

Cypriot NSG

### Background

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

### What is SCoRE?

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

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

The Single Collateral Management Rulebook for Europe (SCoRE) contains 4 Standards related to billing processes (published as the [SCoRE Standards for Billing Processes](#)). Implementation progress is monitored twice per year.

### Introduction

This summary report presents the results of the H2 2022 monitoring exercise conducted by the Cypriot NSG with the involvement among the following stakeholders:

- 1 CSD – Cyprus Stock Exchange
- 5 Custodians

6 entities are monitored in the Cypriot market

This report focuses on the milestones to be met by the time the survey was closed. In this monitoring exercise, participants were expected to have achieved all the

milestones up to Milestone 8 inclusive “Internal testing Started for SCoRE” (with a deadline of 1 July 2022) as described in section 3 below.

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




## 1 Key takeaways

Implementation of the Billing Processes Standards in the Cypriot market is on track

6 stakeholders out of 8 participated in the H2 2022 monitoring exercise. Implementation of the Billing Processes Standards in the Cypriot market is on track.

This section presents the key findings of the survey for each entity type.

**Figure 1**  
**Summary of the monitoring exercise**

	 Response Rate	 Implementation Status	Are all milestones 1 to 8 inclusive achieved?	Will the last milestone 13 be implemented on time (i.e. by 20 November 2023)?
Custodians	71%	Implemented 19.0% Implementation started 9.52% Analysis started 33.3% Analysis not started 9.52% Non applicable standards 28.5% Replies not submitted 0%	Average % of milestones achieved 39%	% of custodians on time 86%
CSD - CYPRUS STOCK EXCHANGE	Survey submitted	Implemented 0% Implementation started 100% Analysis started 0% Analysis not started 0% Non applicable standards 0% Replies not submitted 0%	No	Yes

### CSD – Cyprus Stock Exchange (CSE)

CSE implementation is on track

The CSE is currently behind schedule for the implementation of SCoRE Billing Processes Standards (based on the agreed milestones), as the CSE has indicated that the in-depth analysis of the applicable standards and the adaptation has not yet been completed. Nevertheless, the CSE expects to meet the final implementation date of November 2023. The CSE's compliance with interim milestones depends, to a great extent, on the corresponding harmonisation work of ATHEXCSD (i.e. for Billing Processes Standards 1, 2, 3 and 4). This is because ATHEXCSD is a critical service provider to the CSE as: (i) it hosts and maintains the servers of the Central Depository Central Registry (i.e. 'CDCR', which is a department of the CSE) at the primary site, and (ii) it also maintains the dematerialised securities system of CDCR at a second processing site in Greece.

ATHEXCSD submitted its adaptation plan for SCoRE Standards in June 2020, enabling CSE to obtain a clearer picture of the compliance of the CY market with future milestones. In light of this, the CSE has revised its adaptation plan and submitted an updated version to the ECB in early 2021. Therefore, interim milestones were updated in order to be compatible with ATHEXCSD plan. Additional updates of the implementation milestones were indicated by the CSE since the H1 monitoring exercise, following consultations with ATHEXCSD.

The CSE has indicated that completion of all the analysis and communication activities will be behind schedule, as the CSE expects to complete the detailed external communication (Milestone 5) by the end of February 2023 instead of end of December 2021, while the analysis on the technical changes (Milestone 3) and the completion of the documentation (Milestone 4) will be completed in December 2022 and January 2023 respectively, as opposed to end July 2021 and end December 2021. The CSE has also indicated that the internal adaptation activities (Milestones 6-9) will also be slightly behind schedule. In particular, the CSE expects to meet these milestones by the end of June 2023 instead of early December 2022 (as provided by the AMI-SeCo).

It is noted though that the CSE intends to take such action in order to meet all remaining milestones and to comply with the final implementation date of November 2023.

## Custodians

The majority of custodians have commenced internal analysis

H2 2022 monitoring exercise covers around 72% of custodians which are active in the Cypriot market, the implementation status of whose is distributed as follows:

- 19% have reported that they have already implemented the relevant Standards,
- 10% have reported that there is ongoing development and implementation of the relevant Standards,
- 33% have reported that they have commenced internal analysis,
- 10% have reported that they have not started yet, and

- 28% have reported that the harmonisation is not applicable to their operations.

Standards 3 and 4 do not apply to custodians.

### **NCB**

Central Bank of Cyprus will  
implement the SCoRE Standards in  
November 2023

In the context of the ECMS project, the Central Bank of Cyprus is on track for implementing the SCoRE Billing Processes for its collateral management activities by November 2023.

## 2 Compliance with the standards

This section provides an overview of the current status of compliance with the billing processes 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 are too many to represent individually. Thus the replies of custodians 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	CSD - CYPRUS STOCK EXCHANGE
1: ISO 20022 messaging	14%	G
2: Billing cycles	57%	G
3: Cut-off date		G
4: Dates for payments fees		G

**Notes:**

- Standards 3 and 4 are irrelevant for custodians
- For CSDs and TPAs the colour-code reflects the current implementation status of each Standard in accordance with the methodology outlined in Box 1 above.
- For custodians the % indicates the percentage of custodians which have implemented standards / standards being under development and implementation.
- Percentages are calculated on the basis of expected respondents, i.e. number of entities monitored in the market.

### 3 Progress towards the milestones

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

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

**Table 2**  
Milestones identified by AMI-SeCo

Milestone	Description	Date
M1	<b>Analysis Started:</b> 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	<b>Initial Communication:</b> Has initial high-level communication with external stakeholders on the changes introduced by SCoRE commenced?	01/03/2021
M3	<b>Analysis Completed:</b> Have you completed an in-depth analysis of all applicable SCoRE Standards?	31/07/2021
M4	<b>Documentation Completed:</b> 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	<b>Detailed External Communication:</b> 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	<b>SCoRE Adaptation Started:</b> Have you started to adapt/develop the processes and procedures in order to comply with the SCoRE Standards?	01/01/2022
M7	<b>SCoRE Adaptation Complete:</b> Have you completed the necessary adaptations/developments for the processes and procedures in order to comply with the SCoRE Standards?	30/06/2022
M8	<b>Internal Testing Started for SCoRE:</b> 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	<b>Internal Testing Complete for SCoRE:</b> Have you completed the necessary internal testing?	02/12/2022
M10	<b>External Testing Started for SCoRE:</b> Are you in a position to test the changes introduced in order to comply with the SCoRE Standards with your user community (i.e. CSD participants / Collateral Givers and Collateral Takers in the context of the Standards applicable to TPAs)?	20/03/2023
M11	<b>Final External Communication on SCoRE:</b> has final communication to users been provided (i.e. updated user guide to reflect the changes implemented, final message usage guidelines for A2A communication) related to the SCoRE Standards?	01/04/2023
M12	<b>External Testing Completed for SCoRE:</b> Is the testing of the changes introduced in order to comply with the SCoRE Standards with your user community completed (i.e. CSD participants / Collateral Givers and Collateral Takers in the context of the Standards applicable to TPAs)?	13/10/2023
M13	<b>SCoRE Standards Implemented:</b> have the SCoRE Standards been implemented?	20/11/2023

The current H2 2022 monitoring exercise focuses on milestones 1 to 8 given that Milestone 8 inclusive “Internal testing Started for SCoRE” (with a deadline of 1 July 2022) was meant to have been achieved by the time the survey closed.

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

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

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

**Table 3**  
Expectation of achieving the milestones at the set dates

	Custodians	CSD - CYPRUS STOCK EXCHANGE
Milestone 1 June 2020	43%	Yes
Milestone 2 March 2021	57%	Yes
Milestone 3 July 2021	29%	12/22
Milestone 4 December 2021	29%	01/23
Milestone 5 December 2021	14%	02/23
Milestone 6 January 2022	29%	Yes
Milestone 7 June 2022	57%	03/23
Milestone 8 July 2022	57%	01/23
Milestone 9 December 2022	29%	06/23
Milestone 10 March 2023	57%	04/23
Milestone 11 April 2023	86%	Yes
Milestone 12 October 2023	86%	Yes
Milestone 13 November 2023	86%	Yes

## 4 Concluding remarks

The CSE is currently behind schedule for the implementation of SCoRE Billing Processes Standards (based on the milestones provided by the AMI-SeCo).

CSE compliance with the set milestones depends, to a great extent, on the corresponding harmonisation work of ATHEXCSD, which is a critical service provider to the CSE for hosting and maintaining the servers of the Depository in Greece. Following the submission of ATHEXCSD's adaptation plan in June 2020, the CSE has consulted the concerned stakeholders, including ATHEXCSD and revised its

adaptation plan in order to reflect a more accurate view of the harmonisation progress. Additional updates of the implementation milestones were indicated by the CSE since the H1 2022 monitoring exercise, following consultations with ATHEXCSD.

The CSE has indicated that completion of all the analysis and communication activities will be behind schedule, as the CSE expects to complete the detailed external communication (Milestone 5) by the end of February 2023 instead of end of December 2021, while the analysis on the technical changes (Milestone 3) and the completion of the documentation (Milestone 4) will be completed in December 2022 and January 2023 respectively, as opposed to end July 2021 and end December 2021. The CSE has also indicated that the internal adaptation activities (Milestones 6-9) will also be slightly behind schedule. In particular, the CSE expects to meet these milestones by the end of June 2023 instead of early December 2022 (as provided by the AMI-SeCo).

It is noted though that the CSE intends to take such action in order to meet all remaining milestones and to comply with the final implementation date of November 2023.

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