T+1 Corporate Events Adaptation Plan

Euroclear Bank

Activity	Corporate Events
Plan submitted by	Euroclear Bank
NSG	Belgium
Date	June 2026

Background

The Adaptation Plan provides information on the necessary changes and associated milestones for the implementation of the corporate events processes included in the T+1 Corporate Events Harmonised Implementation Guide.

The Adaptation Plan Table provides an overview of the changes required, if any, to comply with the individual standards, as well as the implementation milestones.

Implementation milestones

Milestone	Description
M1	**Analysis started:** Have you commenced an in-depth analysis to identify and document all the changes required to internal processes and procedures in order to comply with the T+1 Corporate Events Standards?
M2	**Analysis completed and communication provided:** Have you documented all the internal processes and procedures which need to be adapted in order to comply with the T+1 Corporate Events Standards? Has communication been provided to users regarding upcoming changes to business processes and procedures?
M3	**Internal adaptation started:** Have you started to adapt/develop the processes and procedures in order to comply with the T+1 Corporate Events Standards?
M4	**Internal adaptation and testing completed:** Have you completed the necessary adaptations/developments for the processes and procedures in order to comply with the T+1 Corporate Events Standards? Have you completed the necessary internal testing?
M5	**External testing started:** Are you in a position to test the changes introduced in order to comply with the T+1 Corporate Events Standards with your user community (i.e. CSD participants)?
M6	**External testing completed:** Is the testing of the changes introduced in order to comply with the T+1 Corporate Events Standards with your user community completed (i.e. CSD participants)?
M7	**Standard implemented by 11 October 2027:** Have the T+1 Corporate Events Standards been implemented?

Euroclear Bank (BE) - T+1 Corporate Events Adaptation Plan Table

Standard		Adaptation Required		Implementation Milestones
No.	**Standard**	**1. Adaptation Required?**	**2. Description of Changes Required**	**3. Expected date of completion of the following activities:**
Key Dates for Mandatory Distributions				
KD1	The ex-date (which begins at the start of the day) must be on the same date as the record date (which is a snapshot taken at the end of the day).	Adaptation required	**Unsolicitated comment:** as explained during regluar compliance monitoring exercise, In 95% of cases, key dates standards are met. However, they are not always met for investment funds (currently). No final implementation date at this stage, but educational efforts are underway and quaterly market monitoring follow-ups are in place	**Analysis and Communication** — *By* **M1** Analysis started — 01/04/2026 **M2** Analysis completed and communication provided — 01/07/2026 **Internal adaptation and testing** — *By* **M3** Internal adaptation started — 01/08/2026 **M4** Internal adaptation and testing completed — 01/11/2026 **External testing and Implementation** — *By* **M5** External testing started — 01/04/2027 **M6** External testing completed — 01/10/2027 **M7** Standard implemented by 11 October 2027 — 11/10/2027
KD2	The payment date should preferably be one day after the record date.	Adaptation required	**Unsolicitated comment:** as explained during regluar compliance monitoring exercise, In 95% of cases, key dates standards are met. However, they are not always met for investment funds (currently). No final implementation date at this stage, but educational efforts are underway and quaterly market monitoring follow-ups are in place	☑ **Deadlines for KD2 are the same as for KD1 above.** ☐ **Different deadline(s) apply** ***(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	Standard	1. Adaptation Required?	2. Description of Changes Required	3. Expected date of completion of the following activities:
	Key Dates for Mandatory Reorganisations			
KD3	The last trading date should be one business day before the record date.	Adaptation required		☑ **Deadlines for KD3 are the same as for KD1 above.** ☐ **Different deadline(s) apply *(please specify below)***
KD4	The payment date should preferably be one business day after the record date.	Adaptation required		☑ **Deadlines for KD4 are the same as for KD1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	**Standard**	**1. Adaptation Required?**	**2. Description of Changes Required**	**3. Expected date of completion of the following activities:**
	Key Dates for Elective Events			
KD5	The guaranteed participation date should be one business day before the buyer protection deadline.	Adaptation required		☑ **Deadlines for KD5 are the same as for KD1 above.** ☐ **Different deadline(s) apply *(please specify below)***
KD6	The guaranteed participation date should be two business days before the market deadline.	Adaptation required		☑ **Deadlines for KD6 are the same as for KD1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	Standard	1. Adaptation Required?	2. Description of Changes Required	3. Expected date of completion of the following activities:
KD7	The payment date should be one business day after the market deadline.	Adaptation required		☑ **Deadlines for KD7 are the same as for KD1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones	
No.	**Standard**	**1. Adaptation Required?**	**2. Description of Changes Required**	**3. Expected date of completion of the following activities:**	
	Market claims				
MC1	CSDs, or where applicable, CCPs of the two counterparties in the transaction, must identify and, where applicable, create market claims as follows. 1. At close of business on the record date. 2. At least once per hour during daytime processing in the 20 business days following the record date. In a cross-CSD scenario, the 20th business day of the issuer CSD will be considered the final day of the identification period.	Adaptation required		**Analysis and Communication**	*By*
				M1 Analysis started	01/06/2026
				M2 Analysis completed and communication provided	01/09/2026
				Internal adaptation and testing	*By*
				M3 Internal adaptation started	01/09/2026
				M4 Internal adaptation and testing completed	01/01/2027
				External testing and Implementation	*By*
				M5 External testing started	01/03/2027
				M6 External testing completed	01/07/2027
				M7 Standard implemented by 11 October 2027	11/10/2027
MC2	CSDs or, where applicable, CCPs, must create market claims in the following scenarios. 1. Nominal securities: from the seller to the buyer when the intended settlement date is on or before the record date, but the transaction is not settled by the record date. 2. Unit securities: from the seller to the buyer when the trade date is before the ex-date, but the transaction is not settled by the record date. 3. Unit securities: from the buyer to the seller when the trade date is after the ex-date, and the transaction is settled by the record date (in cases where the underlying transaction was partially settled, one market claim should be created for the aggregated quantity of all partial settlements).	Implemented		☐ **Deadlines for MC2 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***	

Standard		Adaptation Required		Implementation Milestones
No.	Standard	1. Adaptation Required?	2. Description of Changes Required	3. Expected date of completion of the following activities:
MC3	CSDs or, where applicable, CCPs must not create market claims for transactions where both settlement instructions include the opt-out indicator 'NOMC' (no automatic market claim).	Implemented		☐ **Deadlines for MC3 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***
MC4	The trade date of the market claim must be the same as the trade date of the underlying transaction.	Implemented		☐ **Deadlines for MC4 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***
MC5	The settlement date of the market claim must be the same as the payment date of the underlying corporate action.	Implemented		☐ **Deadlines for MC5 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones	
No.	**Standard**	**1. Adaptation Required?**	**2. Description of Changes Required**	**3. Expected date of completion of the following activities:**	
MC6	For each outturn (result of corporate action entitlement), a separate market claim instruction must be created as follows: • a free of payment (FOP) instruction must be created for a transfer of securities; • a payment free of delivery (PFOD) instruction must be created for a transfer of cash.	Adaptation required	The market claims settle in the form of a "coupon compensation", meaning they settle together with the underlying settlement instruction. EB processes market claims from the seller to the buyer, if the intended settlement date is on or prior to the last inclusive date of the interest period and the actual settlement date is after the Record Date, for the internal against payment instructions. Euroclear Bank has started a multi year program which foresees the progressive migration of the legacy custody processing to a new Asset Servicing Platform. Compliance with corporate action standards is part of the scope of this project divided into multiple phases with an end delivery date expected around 2029. The milestones indicated are subject to be amended.	☐ **Deadlines for MC6 are the same as for MC1 above.** ☑ **Different deadline(s) apply *(please specify below)*** **Analysis and Communication** **M1** Analysis started: 01/03/2026 **M2** Analysis completed and communication provided: 01/06/2027 **Internal adaptation and testing** — *By* **M3** Internal adaptation started: 01/08/2027 **M4** Internal adaptation and testing completed: 01/08/2028 **External testing and Implementation** — *By* **M5** External testing started: 01/09/2028 **M6** External testing completed: 01/03/2029 **M7** Standard implemented by 11 October 2027: 01/06/2029
MC7	Market claims must be created without any link to the settlement status of the underlying settlement transaction.	Adaptation required	This is a new requirement that is not listed in the standards. This requires an alaysis and likely a development.	☑ **Deadlines for MC7 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***	
MC8	Market claims to deliver cash must be instructed with the “released” status once the underlying corporate event has been paid, regardless of the status of the underlying transaction.	Adaptation required	Currently in line with T2S standards 19) related to Market Claim: The market claim transaction should be instructed with the same status (i.e. either ‘on hold’ or ‘released’) as the underlying transaction. This is a new requirement that is not listed in the standards. This requires an alaysis and likely a development.	☑ **Deadlines for MC8 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***	

Standard		Adaptation Required		Implementation Milestones
No.	**Standard**	**1. Adaptation Required?**	**2. Description of Changes Required**	**3. Expected date of completion of the following activities:**
MC9	Market claims to deliver securities must be instructed with the same status (either “on hold” or “released”) as the underlying transaction once the underlying corporate event has been paid.	Adaptation required	This is a new requirement that is not listed in the standards. This requires an alaysis and likely a development.	☑ **Deadlines for MC9 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***
MC10	CSDs must provide hold and release functionality to their participants to allow them to change the status of market claim instructions.	Adaptation required	In June 2025, EB joined the T2S community in the frame of ECMS and its activity will be strictly limited to collateral monetary policy operations where counterparties will always 'opt-out' (NOMC indicator) so this situation will not happen. However, the compliance rate will grow when Euroclear Bank will deliver the intra-CSD phase from its Central Bank Money project, where scope will be wider than MPO, which require additional developments. The milestones indicated are subject to be amended.	☐ **Deadlines for MC10 are the same as for MC1 above.** ☑ **Different deadline(s) apply *(please specify below)*** **Analysis and Communication** **M1** Analysis started — 01/03/2026 **M2** Analysis completed and communication provided — 01/06/2027 **Internal adaptation and testing** — *By* **M3** Internal adaptation started — 01/08/2027 **M4** Internal adaptation and testing completed — 01/08/2028 **External testing and Implementation** — *By* **M5** External testing started — 01/09/2028 **M6** External testing completed — 01/03/2029 **M7** Standard implemented by 11 October 2027 — 01/06/2029
MC11	The market claims instructions should be sent for settlement: • in the night-time settlement period, if created at the end of day on the record date; • in the real-time settlement period, if created after matching during the 20 business days following the record date or when ‘released’ by the participants for instructions created in ‘on hold’ status.	Implemented		☐ **Deadlines for MC11 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	Standard	1. Adaptation Required?	2. Description of Changes Required	3. Expected date of completion of the following activities:
MC12	Matching is required for all market claims instructions.	Implemented		☐ **Deadlines for MC12 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***
MC13	The following data must be included in the market claim instruction: 1. the transaction type code “CLAI”; 2. the reference of the underlying settlement instruction (in T2S markets, the Market Infrastructure Transaction Identifier must be used); 3. the corporate action event reference assigned by the CSD.	Implemented		☐ **Deadlines for MC13 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***
MC14	The taxation rate of the market claim must: • be determined by the issuer CSD and always be the same for a given ISIN and corporate event. • follow the taxation rules of the source investment country (where the income is sourced), regardless of the country of issuance of the security.	Adaptation required	This is a new requirement that is not listed in the standards. This requires an alaysis and likely a development.	☑ **Deadlines for MC14 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	**Standard**	**1. Adaptation Required?**	**2. Description of Changes Required**	**3. Expected date of completion of the following activities:**
MC15	Partial settlement is: • allowed for market claims in securities if the underlying transaction includes the partial settlement indicator; • not allowed for market claims in cash.	Adaptation required	This is a new requirement that is not listed in the standards. This requires an alaysis and likely a development.	☑ **Deadlines for MC15 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***
MC16	When the creation of a market claim instruction results in outturn securities fractions, the number of outturn securities in the market claim instruction must be rounded down to the nearest whole number. 1. If the issuer does not compensate investors for remaining securities fractions, then no further action is required by the CSD, or where applicable, the CCP. 2. If the issuer compensates investors for remaining securities fractions with cash, an additional PFOD transaction must be created by the CSD, or, where applicable, the CCP, transferring cash to the beneficial owner applying the reference price communicated by the issuer for the underlying corporate event.	Adaptation required	The market claims settle in the form of a "coupon compensation", meaning they settle together with the underlying settlement instruction. EB processes market claims from the seller to the buyer, if the intended settlement date is on or prior to the last inclusive date of the interest period and the actual settlement date is after the Record Date, for the internal against payment instructions. Euroclear Bank has started a multi year program which foresees the progressive migration of the legacy custody processing to a new Asset Servicing Platform. Compliance with corporate action standards is part of the scope of this project divided into multiple phases with an end delivery date expected around 2029. The milestones indicated are subject to be amended.	☐ **Deadlines for MC16 are the same as for MC1 above.** ☑ **Different deadline(s) apply *(please specify below)*** **Analysis and Communication** **M1** Analysis started — 01/03/2026 **M2** Analysis completed and communication provided — 01/06/2027 **Internal adaptation and testing** — *By* **M3** Internal adaptation started — 01/08/2027 **M4** Internal adaptation and testing completed — 01/08/2028 **External testing and Implementation** — *By* **M5** External testing started — 01/09/2028 **M6** External testing completed — 01/03/2029 **M7** Standard implemented by 11 October 2027 — 01/06/2029
MC17	If the underlying corporate action event is reversed, the CSD or, where applicable, the CCP should reverse the market claim.	Adaptation required	This is a new requirement that is not listed in the standards. This requires an alaysis and likely a development.	☑ **Deadlines for MC17 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	Standard	1. Adaptation Required?	2. Description of Changes Required	3. Expected date of completion of the following activities:
MC18	Upon creation, participants are informed about the creation of a market claim transaction via the *Market Claim Creation* (seev.050) message.	Adaptation required	This is a new requirement that is not listed in the standards. This requires an alaysis and likely a development.	☑ **Deadlines for MC18 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***
MC19	If a market claim has been created on hold, participants need to send a request to release the market claim for settlement by populating the hold indicator with the flag “false” in the *Securities Settlement Conditions Modification Request* (sese.030).	Adaptation required	This is a new requirement that is not listed in the standards. This requires an alaysis and likely a development.	☑ **Deadlines for MC19 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***
MC20	Participants are informed about any changes in the status of a previously created market claim transaction via the *Market Claim Creation Status Advice* (seev.052) message.	Adaptation required	This is a new requirement that is not listed in the standards. This requires an alaysis and likely a development.	☑ **Deadlines for MC20 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	Standard	1. Adaptation Required?	2. Description of Changes Required	3. Expected date of completion of the following activities:
MC21	Participants may request the cancellation of a pending market claim using the *Market Claim Cancellation Request* (seev.051) message.	Adaptation required	This is a new requirement that is not listed in the standards. This requires an alaysis and likely a development.	☑ **Deadlines for MC21 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***
MC22	Participants are informed of the status of a market claim cancellation request via the *Market Claim Cancellation Request Status Advice* (seev.053) message.	Adaptation required	This is a new requirement that is not listed in the standards. This requires an alaysis and likely a development.	☑ **Deadlines for MC22 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***
MC23	The payment of a market claim will be confirmed via the *Corporate Action Movement Confirmation* (seev.036) message.	Adaptation required	This is a new requirement that is not listed in the standards. This requires an alaysis and likely a development.	☑ **Deadlines for MC23 are the same as for MC1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones	
No.	**Standard**	**1. Adaptation Required?**	**2. Description of Changes Required**	**3. Expected date of completion of the following activities:**	
	Transformations				
TF1	CSDs, or where applicable, CCPs of the two counterparties in the transaction, must transform pending settlement transactions as follows. 1. At close of business on the record date (for mandatory reorganisations) or the market deadline (for mandatory reorganisations with options or voluntary reorganisations). If the underlying instruction has been partially settled, only the unsettled part of the transaction should be transformed. 2. At the time of matching for any eligible settlement instructions that acquire matching status during the 20 business days following the record date (for mandatory reorganisations) or the market deadline (for mandatory reorganisations with options or voluntary reorganisations). In a cross-CSD scenario, the 20th business day will be considered the final day of the transformation period.	Implemented	**Unsolicitated comment:** the transformations of some trades involving investment funds were not supported by Euroclear France. The ISINs concerned by the issue are all ETFs issued by French issuers (BNP Paribas and Amundi) for which Euroclear France is the issuer CSD. Every trade concerned by the issue involved two different agents: one for the underlying security and another one for the proceeds security. The transformations could not be generated by Euroclear France because the corporate action proceeds (security outturns of the transformations) were not eligible on the ESES platform. In such cases, Euroclear France does not process the delivery of the proceeds and the agent handles the distribution bilaterally with its client. This is a minor deviation from this recommandation	**Analysis and Communication** — *By* **M1** Analysis started — 18/03/2026 **M2** Analysis completed and communication provided — 01/09/2026 **Internal adaptation and testing** — *By* **M3** Internal adaptation started — 01/09/2026 **M4** Internal adaptation and testing completed — 01/01/2027 **External testing and Implementation** — *By* **M5** External testing started — 01/03/2027 **M6** External testing completed — 01/07/2027 **M7** Standard implemented by 11 October 2027 — 11/10/2027
TF2	CSDs or, where applicable, CCPs must only cancel pending settlement transactions and not create replacement instructions for transactions where both settlement instructions include the opt-out indicator 'NOMC'.	Implemented		☐ **Deadlines for TF2 are the same as for TF1 above.** ☐ **Different deadline(s) apply *(please specify below)***	

Standard		Adaptation Required		Implementation Milestones
No.	Standard	1. Adaptation Required?	2. Description of Changes Required	3. Expected date of completion of the following activities:
TF3	Settlement in the old ISIN must be discontinued after: • the record date, in the case of mandatory reorganisations; • the market deadline, in the case of mandatory reorganisations with options.	Implemented		☐ **Deadlines for TF3 are the same as for TF1 above.** ☐ **Different deadline(s) apply *(please specify below)***
TF4	The settlement date of the new transaction(s) must be the latest between (i) the payment date of the entitlement, and (ii) the settlement date of the underlying transaction.	Implemented		☐ **Deadlines for TF4 are the same as for TF1 above.** ☐ **Different deadline(s) apply *(please specify below)***
TF5	During the transformation process, CSDs or, where applicable, CCPs must: 1. cancel the pending instructions on the underlying ISIN; 2. send transformed instructions on the outturn ISIN and/or cash for settlement. The CSD/CCP must wait for the cancellation of the pending instructions to be confirmed before proceeding with step 2.	Implemented		☐ **Deadlines for TF5 are the same as for TF1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	Standard	1. Adaptation Required?	2. Description of Changes Required	3. Expected date of completion of the following activities:
TF6	Transformations into cash must be instructed with the “released” status (regardless of the status of the underlying transaction).	Adaptation required	We are currently in line with the T2S standard 12) The transformed transaction should be instructed with the same status as the underlying transaction. This reco deviates from it and requires analysis.	☑ **Deadlines for TF6 are the same as for TF1 above.** ☐ **Different deadline(s) apply *(please specify below)***
TF7	Transformations into (one or more) securities must be instructed with the same status (either “on hold” or “released”) as the underlying transaction.	Implemented		☐ **Deadlines for TF7 are the same as for TF1 above.** ☐ **Different deadline(s) apply *(please specify below)***
TF8	CSDs must provide hold and release functionality to their participants to allow them to change the status of market claim instructions.	Implemented		☐ **Deadlines for TF8 are the same as for TF1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	**Standard**	**1. Adaptation Required?**	**2. Description of Changes Required**	**3. Expected date of completion of the following activities:**
TF9	The transformation instructions should be sent for settlement: • in the night-time settlement period, if created at the end of day on the record date; • in the real-time settlement period, if created after matching during the 20 business days following the record date or when “released” by the participants for instructions created in “on hold” status.	Implemented		☐ **Deadlines for TF9 are the same as for TF1 above.** ☐ **Different deadline(s) apply *(please specify below)***
TF10	Matching is required for all types of transformations, i.e. securities and cash.	Implemented		☐ **Deadlines for TF10 are the same as for TF1 above.** ☐ **Different deadline(s) apply *(please specify below)***
TF11	The following data must be included in the transformed instruction: 1. the reference of the underlying (original) transaction (in T2S markets, the Market Infrastructure Transaction Identifier must be used); 2. the “TRAN” ISO settlement transaction condition code; 3. the corporate action event reference assigned by the CSD; 4. the transaction type code, which should be the same as the one included in the original instruction.	Implemented		☐ **Deadlines for TF11 are the same as for TF1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	**Standard**	**1. Adaptation Required?**	**2. Description of Changes Required**	**3. Expected date of completion of the following activities:**
TF12	For transformations into cash, the following applies. 1. If the instruction of the underlying transaction was against payment, two new instructions, in opposite directions, must be created; one for the settlement amount and one for the cash outturn. The transfers should not be linked. 2. If the instruction of the underlying transaction was free of payment, only one transfer, for the cash outturn, must be created. 3. Partial settlement is not allowed.	Adaptation required	Point 3 is a new requirement, not in line with current CA standards. This requires an analysis.	☑ **Deadlines for TF12 are the same as for TF1 above.** ☐ **Different deadline(s) apply *(please specify below)***
TF13	For transformations into securities, the following applies. 1. Partial settlement is allowed if the underlying transaction includes the partial settlement indicator.	Implemented		☐ **Deadlines for TF13 are the same as for TF1 above.** ☐ **Different deadline(s) apply *(please specify below)***
TF14	For transformations into two or more new securities (multiple outturns): 1. the settlement amount of the transformed (new) instructions must be proportional to the ratio of each outturn security; 2. to allow each replacement transaction to settle irrespective of the others, the new instructions must not be settled as linked settlements.	Implemented		☐ **Deadlines for TF14 are the same as for TF1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	Standard	1. Adaptation Required?	2. Description of Changes Required	3. Expected date of completion of the following activities:
TF15	For transformations resulting in outturn securities fractions: 1. the number of securities should be rounded down to the nearest whole number; 2. if the issuer compensates investors for the remaining securities fractions with cash, then an additional PFOD transaction should be created by CSDs applying the reference price communicated the issuer (if the issuer does not compensate investors, no further action is required by the CSD).	Implemented		☐ **Deadlines for TF15 are the same as for TF1 above.** ☐ **Different deadline(s) apply *(please specify below)***
TF16	If an issuer or investor CSD holds a position in a security undergoing a reorganisation and does not have a link to the issuer CSD of the outturn security, then it should: 1. process the debit of the underlying securities only; 2. advise the holders of the underlying securities to provide specific delivery details for receiving the outturn ISIN outside of the CSD.	Implemented		☐ **Deadlines for TF16 are the same as for TF1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones	
No.	**Standard**	**1. Adaptation Required?**	**2. Description of Changes Required**	**3. Expected date of completion of the following activities:**	
	Buyer Protection				
BP1	Buyer protection instructions may be submitted on matched underlying transactions only on securities subject to an elective corporate action event.	Implemented		**Analysis and Communication**	*By*
				M1 Analysis started	01/04/2026
				M2 Analysis completed and communication provided	01/02/2028
				Internal adaptation and testing	*By*
				M3 Internal adaptation started	01/06/2028
				M4 Internal adaptation and testing completed	01/08/2029
				External testing and Implementation	*By*
				M5 External testing started	01/02/2029
				M6 External testing completed	01/09/2029
				M7 Standard implemented by 11 October 2027	01/03/2030
BP2	Any buyer protection instruction by the buyer prior to the buyer protection deadline and related to a transaction for which the trade date is on or before the guaranteed participation date, with intended settlement date no later than the buyer protection deadline, is a binding instruction and should be accepted without requiring matching.	Implemented		☐ **Deadlines for BP2 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***	

Standard		Adaptation Required		Implementation Milestones
No.	Standard	1. Adaptation Required?	2. Description of Changes Required	3. Expected date of completion of the following activities:
BP3	The buyer protection deadline should follow the guaranteed participation date by a settlement cycle.	Implemented		☐ **Deadlines for BP3 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***
BP4	The buyer protection deadline should be at least one business day before the market deadline.	Implemented		☐ **Deadlines for BP4 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***
BP5	The buyer submits a *Buyer Protection Instruction* (seev.060), which includes information on the corporate action, the related settlement instruction and the corporate action election as set out in Table 10 of the Harmonised Implementation Guide, to its account servicer for onward transmission via the chain of intermediaries to the issuer CSD.	Adaptation required	The implementation milestones are indicative and may evolve over time. Such a transformative enhancement would deliver its full benefits only if activated simultaneously across market stakeholders or in coordination with other CSDs.	☑ **Deadlines for BP5 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	Standard	1. Adaptation Required?	2. Description of Changes Required	3. Expected date of completion of the following activities:
BP6	Upon receipt, the CSD checks the validity of the buyer protection instruction.	Adaptation required	The implementation milestones are indicative and may evolve over time. Such a transformative enhancement would deliver its full benefits only if activated simultaneously across market stakeholders or in coordination with other CSDs.	☑ **Deadlines for BP6 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***
BP7	Upon completion of the validation checks, the CSD sends a *Buyer Protection Instruction Status Advice* (seev.061), which includes the information set out in Table 12 of the Harmonised Implementation Guide, to the sender.	Adaptation required	The implementation milestones are indicative and may evolve over time. Such a transformative enhancement would deliver its full benefits only if activated simultaneously across market stakeholders or in coordination with other CSDs.	☑ **Deadlines for BP7 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***
BP8	If the buyer protection instruction is valid, the CSD also informs the seller that a buyer protection instruction has been received via a *Buyer Protection Instruction Allegement Notification* (seev.064), which includes the information set out in Table 13 of the Harmonised Implementation Guide.	Adaptation required	The implementation milestones are indicative and may evolve over time. Such a transformative enhancement would deliver its full benefits only if activated simultaneously across market stakeholders or in coordination with other CSDs.	☑ **Deadlines for BP8 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	**Standard**	**1. Adaptation Required?**	**2. Description of Changes Required**	**3. Expected date of completion of the following activities:**
BP9	The buyer protection instruction can be amended or cancelled by the buyer before the buyer protection deadline: • In case of amendments, the buyer must first cancel its original buyer protection instruction by submitting a *Buyer Protection Instruction Cancellation Request* (seev.062) to its account servicer for onward transmission via the chain of intermediaries to the issuer CSD. The buyer then submits a new buyer protection instruction to reinstruct (see BP5 above). • In case of cancellation, the buyer submits a *Buyer Protection Instruction Cancellation Request* (seev.062) to its account servicer for onward transmission via the chain of intermediaries to the issuer CSD. The *Buyer Protection Instruction Cancellation Request* includes the information set out in Table 14 of the Harmonised Implementation Guide.	Adaptation required	The implementation milestones are indicative and may evolve over time. Such a transformative enhancement would deliver its full benefits only if activated simultaneously across market stakeholders or in coordination with other CSDs.	☑ **Deadlines for BP9 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***
BP10	Upon receipt, the CSD checks the validity of the buyer protection instruction cancellation request.	Adaptation required	The implementation milestones are indicative and may evolve over time. Such a transformative enhancement would deliver its full benefits only if activated simultaneously across market stakeholders or in coordination with other CSDs.	☑ **Deadlines for BP10 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***
BP11	Upon completion of the validation checks, the CSD sends a *Buyer Protection Instruction Cancellation Request Status Advice* (seev.062) to the sender, which includes the information set out in Table 16 of the Harmonised Implementation Guide.	Adaptation required	The implementation milestones are indicative and may evolve over time. Such a transformative enhancement would deliver its full benefits only if activated simultaneously across market stakeholders or in coordination with other CSDs.	☑ **Deadlines for BP11 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	Standard	1. Adaptation Required?	2. Description of Changes Required	3. Expected date of completion of the following activities:
BP12	If the instruction is valid, the CSD also informs the seller that the buyer protection instruction has been cancelled via a *Buyer Protection Instruction Allegement Removal Advice* (seev.065), which includes the information set out in Table 17 of the Harmonised Implementation Guide.	Adaptation required	The implementation milestones are indicative and may evolve over time. Such a transformative enhancement would deliver its full benefits only if activated simultaneously across market stakeholders or in coordination with other CSDs.	☑ **Deadlines for BP12 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***
BP13	In respect of any buyer protection instruction submitted by the buyer prior to the buyer protection deadline, settlement of the underlying transaction should be allowed until the buyer protection deadline.	Adaptation required	The implementation milestones are indicative and may evolve over time. Such a transformative enhancement would deliver its full benefits only if activated simultaneously across market stakeholders or in coordination with other CSDs.	☑ **Deadlines for BP13 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***
BP14	The buyer protection remains valid as long as the underlying settlement transaction is still pending. Once the underlying transaction settles, the related buyer protection instructions become void and are automatically cancelled by the CSD(s).	Adaptation required	The implementation milestones are indicative and may evolve over time. Such a transformative enhancement would deliver its full benefits only if activated simultaneously across market stakeholders or in coordination with other CSDs.	☑ **Deadlines for BP14 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	Standard	1. Adaptation Required?	2. Description of Changes Required	3. Expected date of completion of the following activities:
BP15	The CSD notifies the buyer (via a *Buyer Protection Instruction Status Advice* (seev.061) with a status Rejected due to reason DUST – Underlying Transaction Already Settled) and the seller (via a *Buyer Protection Instruction Allegement Removal Advice* (seev.065) with Allegement Removal Reason = Cancelled).	Adaptation required	The implementation milestones are indicative and may evolve over time. Such a transformative enhancement would deliver its full benefits only if activated simultaneously across market stakeholders or in coordination with other CSDs.	☑ **Deadlines for BP15 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***
BP16	In case of partial settlement, the buyer protection instruction will remain valid for the quantity that has not yet settled without requiring the submission of an amended buyer protection instruction.	Adaptation required	The implementation milestones are indicative and may evolve over time. Such a transformative enhancement would deliver its full benefits only if activated simultaneously across market stakeholders or in coordination with other CSDs.	☑ **Deadlines for BP16 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***
BP17	Settlement transactions with a valid buyer protection instruction that are still pending on the buyer protection deadline should be frozen (put on hold) by the CSD(s) until their transformation on market deadline/record date to ensure that the buyer's buyer protection instruction is executed.	Adaptation required	The implementation milestones are indicative and may evolve over time. Such a transformative enhancement would deliver its full benefits only if activated simultaneously across market stakeholders or in coordination with other CSDs.	☑ **Deadlines for BP17 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***

Standard		Adaptation Required		Implementation Milestones
No.	Standard	1. Adaptation Required?	2. Description of Changes Required	3. Expected date of completion of the following activities:
BP18	The transformation of the underlying transaction should be carried out by the CSD(s), in accordance with the buyer protection instruction, on the market deadline/record date of the concerned elective corporate action.	Adaptation required	The implementation milestones are indicative and may evolve over time. Such a transformative enhancement would deliver its full benefits only if activated simultaneously across market stakeholders or in coordination with other CSDs.	☑ **Deadlines for BP18 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***
BP19	For mandatory reorganisations with options, non-elected transactions should transform into the default option set by the issuer CSD.	Adaptation required	The implementation milestones are indicative and may evolve over time. Such a transformative enhancement would deliver its full benefits only if activated simultaneously across market stakeholders or in coordination with other CSDs.	☑ **Deadlines for BP19 are the same as for BP1 above.** ☐ **Different deadline(s) apply *(please specify below)***