

SCoREBOARD

Corporate Actions – H2 2022

Greek 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 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 H2 2022 monitoring exercise conducted by the Greek NSG among the following stakeholders:

- 2 CSDs – ATHEXCSD, BOGS
- 7 Custodians
- 2 Issuers

11 entities are monitored in the Greek market

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 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 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.




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Key takeaways

A very high response rate has been achieved amongst the Greek community for this monitoring cycle

The response rate of the Greek community to the H2 2022 monitoring cycle for the implementation of the SCoRE Corporate Actions Standards was very high, i.e. all monitored actors filled the relevant questionnaires. According to the replies received, the implementation of the standards in the Greek market is on track. For additional information, please refer to the below analysis of the responses per entity type.

Figure 1
Summary of the monitoring exercise

 <small>SINGLE COLLECTIVE MANAGEMENT RELIEF FOR EUROPE</small>	 Response Rate	 Implementation Status of the standards	Are all milestones 1 to 8 inclusive achieved?	Will the last milestone 13 be implemented on time (i.e. by 20 November 2023) ?
Custodians	100%	Implemented 26.8% Implementation started 25.1% Analysis started 37.3% Analysis not started 0.12% Non applicable standards 10.4% Replies not submitted 0%	Average % of milestones achieved 57%	% of custodians on time 100%
Issuers	100%	Aware of obligations 93.9% Not aware of obligations 6.06% Replies not submitted 0%	NA (milestones irrelevant for issuers)	NA
CSD - AthexCSD	Survey submitted	Implemented 5.53% Implementation started 44.2% Analysis started 39.5% Analysis not started 0% Non applicable standards 10.6% Replies not submitted 0%	No	Yes
CSD - BOGS	Survey submitted	Implemented 8.08% Implementation started 34.4% Analysis started 5.95% Analysis not started 0% Non applicable standards 51.4% Replies not submitted 0%	Yes	Yes

CSD – ATHEXCSD

ATHEXCSD has participated in the current reporting cycle and expects to meet the final milestones on time

ATHEXCSD, the CSD in Greece managing equities and a limited amount of corporate bonds has reported that all Corporate Actions Standards applicable to its activities will be implemented.

Regarding the milestones and according to the reporting provided, some of them are expected to be delayed. In any case, the final milestones will be met.

Following the above, it is considered that, there are no issues of concern regarding the compliance of the ATHEXCSD to the Corporate Actions Standards and the CSD will most likely be compliant with the standards by November 2023.

CSD – BOGS

BOGS has commenced internal testing and expects to meet all but one of the remaining milestones on time.

BOGS, the CSD in Greece managing the Government bonds, has reported that it will implement all the standards applicable to its activities. BOGS is expected to complete its internal testing in January 2023 instead of the beginning of December 2022, date foreseen by the relevant milestone. However, this will not affect the remaining milestones until the final one that will be met according to the relevant timeline. Therefore, this CSD is expected to be compliant with the standards by November 2023.

Custodians

Custodians have fully participated in this reporting round and they are expected to meet the final milestones on time

Custodians in the Greek market have fully participated in this reporting round by indicating the current status for each one of the standards that are applicable to their activities. Following their replies, most of the relevant standards are either already implemented via their existing processes or internal analysis/implementation has started. Furthermore, according to the replies submitted, the majority of the custodians will not be able to meet all the milestones on time, but in any case all of them are expecting that they will be ready for the go-live of the standards.

Issuers

Issuer awareness is very high

Regarding the monitored issuers awareness of their obligations stemming from the Corporate Actions Standards, a percentage of almost 100 % has been reported.

NCB

Bank of Greece is on track to adopt the SCoRE Standards in November 2023

Bank of Greece is on track to implement the Corporate Actions Standards for its collateral management activities in November 2023.

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 - AthexCSD	CSD - BOGS
1A: Notification	74%	100%	G	G
1B: Instruction	60%		G	G
1C: Advise	71%		G	G
1D: Confirmation	55%		G	G
1E: Reversal	57%		G	G
1F: Meeting Notification	71%	100%	Y	G
1G: Meeting Instruction	71%		G	Y
1H: Meeting Results	66%		Y	Y
2: Calculation of Proceeds	49%	100%	Y	G
3: Consistency of Information	49%	100%	Y	G
4: Rounding Rule 1	71%	100%	Y	G
4: Rounding Rule 2	86%	100%	B	B
4: Rounding Rule 3	71%	100%	B	B
4: Rounding Rule 4	71%	100%	Y	G
4: Rounding Rule 5	86%	100%	B	G
5: Negative Cash Flows	29%	50%	Y	B
6: Business Day Rule		100%	Y	B
7: Securities Amount Data Rule 1		100%	Y	B
7: Securities Amount Data Rule 2		100%	B	N/A
7: Securities Amount Data Rule 3		100%	B	N/A
7: Securities Amount Data Rule 4		100%	B	N/A
8: Payment Time Rule 1		100%	B	B
8: Payment Time Rule 2		100%	B	N/A
8: Payment Time Rule 3		100%	B	B
8: Payment Time General Principle 3		50%	N/A	B
9: Processing Status	43%	100%	G	G
10: Rule 1	86%		G	B
10: Rule 2	71%		G	G
10: Rule 3	57%		G	G
11: Default Option	86%	100%	B	G
12: Handling of Fees	57%		Y	N/A
13: Reversal	29%	100%	G	G
14: Foreign Currency			B	N/A
15: ISO 20022 Messaging	34%		Y	G

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.
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- For custodians, the percentage of custodians which have implemented standards / standards being under development and implementation.
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- 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 avoid 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	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?	02/12/2022
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)?	20/03/2023
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?	01/04/2023
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)?	13/10/2023
M13	SCoRE Standards Implemented: 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
Entities' expectation of achieving the milestones at the set dates

	Custodians	CSD - AthexCSD	CSD - BOGS
Milestone 1 June 2020	57%	Yes	Yes
Milestone 2 March 2021	57%	Yes	Yes
Milestone 3 July 2021	57%	12/22	Yes
Milestone 4 December 2021	57%	01/23	Yes
Milestone 5 December 2021	57%	02/23	Yes
Milestone 6 January 2022	57%	Yes	Yes
Milestone 7 June 2022	57%	03/23	Yes
Milestone 8 July 2022	57%	01/23	Yes
Milestone 9 December 2022	57%	06/23	01/23
Milestone 10 March 2023	71%	04/23	Yes
Milestone 11 April 2023	86%	Yes	Yes
Milestone 12 October 2023	100%	Yes	Yes
Milestone 13 November 2023	100%	Yes	Yes

4 Concluding remarks

As shown in the above table, BOGS is on track and it has confirmed that it will meet all milestones on time with a minor exception being M9, which will be met with a minor delay. This delay however won't affect the progress of the project. ATHEXCSD has also indicated that although some delays are foreseen for the interim milestones, the final ones are expected to be met according to the existing timeframe. As far as the custodians are concerned, while for some of them delays in the interim milestones have been reported, all of them have confirmed that the final milestones will be met in the foreseen timeline.

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