

# SCoREBOARD

## Corporate Actions – H1 2023

Italian 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 Italian NSG with the involvement among the following stakeholders:

11 entities are monitored in the Italian market

- 1 CSD – Euronext Securities Milan<sup>1</sup>
- 7 Custodians
- 1 Issuer association
- 2 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

Implementation of Corporate Actions Standards in the Italian market is on track.

Activities regarding the Corporate Action standards in the Italian market are on track.<sup>2</sup>

Regarding Standard 6: Business Day Rule, the Italian NSG is actively raising awareness of this standard among all stakeholders and issuers, in collaboration with Italian industry associations. For ISO 20022 Corporate Actions messages, some custodians have stressed that their implementation is requested in Wave 2 (i.e. 2025), while the CSD stated that the implementation of ISO20022 in Wave 1 (i.e. April 2024) is only related to the interaction with the ECMS.




The majority of the reporting entities responded to the survey. This section presents the key findings of the survey for each entity type.

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<sup>1</sup> Euronext Securities Milan is the new commercial name for the legal entity Monte Titoli.

<sup>2</sup> Implemented on time reflects the entity's expected ability to achieve the final milestone on time

**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	71%	Implemented 47.6% Implementation started 4.57% Analysis started 12.1% Analysis not started 1.14% Non applicable standards 5.96% Replies not submitted 28.5%	Average % of milestones achieved 41%	% of custodians on time 57%
Issuers	100%	Aware of obligations 88.8% Not aware of obligations 11.1% Replies not submitted 0%	NA (milestones irrelevant for issuers)	NA
CSD - Euronext Securities Milan	Survey submitted	Implemented 6.38% Implementation started 35.3% Analysis started 0% Analysis not started 47.6% Non applicable standards 10.6% Replies not submitted 0%	No	Yes

### CSD – Euronext Securities Milan

Euronext Securities Milan adaptation activities are ongoing.

Euronext Securities Milan’s adaptation activities are ongoing: 6.38% of the standards are already implemented while implementation started for 35.3% of the standards. For Corporate Action events related to non-debt instruments, analysis has not started yet as the final implementation date is expected to be January 2026 (explaining the 47.6% of the standards not yet analysed). A small percentage of standards are not applicable (10.6%) as Euronext Securities Milan does not manage meeting instructions and proxy voting services.

Adaptations are related to Standard 1A-1F, Standard 2 and 3 (for debt-instrument events), Standard 6: Business Day Rule, Standard 8: Payment Time,<sup>3</sup> Standard 10, Standard 11: Default Options (for debt-instrument), Standard 13: Reversal, and

<sup>3</sup> For simultaneous settlement of cash and security movements.

Standard 15: ISO 20022. As for the 'Meeting' Standards (i.e. 1F, 1G, 1H), Euronext Securities Milan confirmed that they will implement only the 'Notification' Process and Workflow (i.e. 1F).

The Standard 15: ISO 20022 will be implemented by April 2024 only for interaction with the ECMS platform; any ISO20022 messages exchanged with other CSD participants will be developed by January 2026.

The implementation of Standard 5: Negative Cash Flow and Standard 14: Foreign Currency have been postponed by January 2026 and, so, the analysis has not yet started.

### **Custodians**

Custodians' implementation is ongoing.

There was a high response rate among custodians. 71% of custodians have responded to the survey; at the aggregate level, about 47.6% of the standards are already implemented, 12.1% of standards are under analysis for adaptation, while 4.57% are under implementation.

The standards under analysis are similar to those reported by the CSD; most of the ongoing implementation is related to Standard 3: Consistency of Information and Standard 1: Business Processes and Workflows, in particular for meeting events.

### **Issuers**

The Italian NSG is actively raising awareness of the Standards amongst issuers.

The questionnaire for issuers was sent to ASSONIME, the Association of Italian Joint Stock Companies, and two financial issuers.

It was confirmed that issuers are aware of the obligations (88.8%); the standards not fully confirmed are:

- Standard 1F: Meeting Event Notifications, as some information among those listed in the standard itself are not applicable to the Italian market.
- Standard 2: Calculation of Proceeds and Standard 3: Consistency of Information, as some corporate action events are not used in the Italian market.
- Standard 5: Negative Cash Flow, based on the feedback received, it seems not applicable to Italian issuers.

Regarding Standard 6: Business Day Rule, it was confirmed that new securities issuances (as of April 2024) will be in accordance with the standard. On this point, the Italian NSG is actively raising awareness of this standard among all stakeholders and issuers, in collaboration with Italian industry associations.

### **NCB**

Banca d'Italia is on track to adopt the SCoRE Standards by April 2024

Banca d'Italia is on track to adopt the SCoRE Standards for Corporate Actions for its collateral management activities by April 2024.

## 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

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- 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 - Euronext Securities Milan
1A: Notification	71%	100%	G
1B: Instruction	71%		G
1C: Advise	66%		G
1D: Confirmation	63%		G
1E: Reversal	52%		G
1F: Meeting Notification	65%	80%	G
1G: Meeting Instruction	61%		R
1H: Meeting Results	33%		R
2: Calculation of Proceeds	66%	33%	R
3: Consistency of Information	63%	67%	R
4: Rounding Rule 1	71%	100%	B
4: Rounding Rule 2	57%	100%	B
4: Rounding Rule 3	71%	100%	B
4: Rounding Rule 4	57%	100%	B
4: Rounding Rule 5	71%	100%	B
5: Negative Cash Flows	43%	33%	R
6: Business Day Rule		100%	G
7: Securities Amount Data Rule 1		100%	B
7: Securities Amount Data Rule 2		100%	B
7: Securities Amount Data Rule 3		100%	B
7: Securities Amount Data Rule 4		67%	B
8: Payment Time Rule 1		100%	B
8: Payment Time Rule 2		100%	B
8: Payment Time Rule 3		100%	G
8: Payment Time General Principle 3		67%	B
9: Processing Status	29%	100%	R
10: Rule 1	57%		G
10: Rule 2	33%		B
10: Rule 3	50%		R
11: Default Option	71%	100%	R
12: Handling of Fees	33%		R
13: Reversal	29%	100%	G
14: Foreign Currency			R
15: ISO 20022 Messaging	17%		R

Notes:

- 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.
- 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	<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?	10/03/2023
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)?	22/05/2023
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?	22/05/2023
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)?	16/02/2024
M13	<b>SCoRE Standards Implemented:</b> 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 - Euronext Securities Milan
Milestone 1 June 2020	57%	Yes
Milestone 2 March 2021	57%	Yes
Milestone 3 July 2021	29%	Yes
Milestone 4 December 2021	43%	Yes
Milestone 5 December 2021	57%	Yes
Milestone 6 January 2022	57%	Yes
Milestone 7 June 2022	14%	06/23
Milestone 8 July 2022	43%	06/23
Milestone 9 March 2023	14%	11/23
Milestone 10 May 2023	14%	11/23
Milestone 11 May 2023	14%	Yes
Milestone 12 February 2024	43%	Yes
Milestone 13 April 2024	57%	Yes



## 4 Concluding remarks

Regarding Euronext Securities Milan's planning, for the current milestones a delay was reported only for three of them: Milestone 7 (Adaptation completed), Milestone 8 (Internal testing started) and Milestone 9 (Internal testing completed). These first two milestones are expected to have been completed by June 2023 and the last one by November 2023.

Future milestones are on track, in particular the go-live is confirmed for April 2024.

Less than half custodians have completed the current milestones; the lowest percentage of compliance - 14% - is for Milestone 7 (Adaptation finished) (which will be completed by the majority of custodians by the end of 2023) and for Milestone 9 (Internal testing completed) (which will be completed by the majority of custodians by early 2024).

Almost all custodians confirmed that they will implement the SCoRE standards by April 2024 (Wave 1), except for ISO 20022, which will be met by Wave 2 (i.e. 2025).

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