

SCoREBOARD

Corporate Actions – H1 2021

German NSG





The Single Collateral Management Rulebook for Europe (SCoRE) contains 15 Standards related to the processing of corporate actions (published as the [AMI-SeCo Standards for Corporate Actions](#)). Implementation progress is monitored twice per year. This summary report presents the results of the H1 2021 monitoring exercise conducted by the German NSG with the involvement of the following stakeholders:

- 1 CSD – Clearstream Banking Frankfurt
- 1 TPA – Clearstream Banking Frankfurt
- 16 Custodians
- 8 Issuers

26 entities are monitored in the German market

The SCoRE Overview provides a high-level summary of the H121 monitoring exercise.

SCoRE Overview

SCoRE SINGLE COLLATERAL MANAGEMENT RULEBOOK FOR EUROPE	 Response Rate	 Implementation Status	 Milestones achieved?	 Implemented on Time?
Custodians	94%	Implemented 26.3% Analysis started 39.7% Implementation started 2.90%	38%	88%
Issuers	75%	Yes 31.5% No 56%	n/a	n/a
CSD - Clearstream Banking Frankfurt	100%	Implemented 45.3% Analysis started 48.4% Implementation started 0%	Yes	Yes
TPA - Clearstream Banking Frankfurt	100%	Implemented 12.5% Analysis started 87.5% Implementation started 0%	Yes	Yes

Note: Implemented on Time reflects the entity's expected ability to achieve the final milestone on time.

This NSG summary report is structured as follows: The Executive Summary provides an overview of the responses received per Entity Type i.e. CSD, TPA, Custodian etc. Section 1 presents the compliance status of each entity type. Section 2 provides an overview of the progress against the individual milestones. Section 3 then provides a more detailed overview of the implementation status per Standard for each entity type.

Executive Summary

The overall implementation of the Corporate Actions Standards in the German market is fully on track, however, a more detailed view shows a mixed image.

Clearstream Banking Frankfurt as CSD has already implemented 45.3 % of the corporate action standards and is on track with the remaining standards but further work is still required within the Asset Services Expert Group in some areas, i.e. considerable issues remain with specific standards, which require resolution in order to guarantee no impacts to short-term milestones.

For Clearstream Banking Frankfurt as TPA, standard one is the only relevant corporate action standard. Most of the related sub-standards are still in the process of analysis. In summary Clearstream Banking Frankfurt as TPA is fully on track.

Clearstream Banking Frankfurt currently remains on track to meet all implementation milestones but is at risk of short-term slippage of the standards until some specific standards become stable.

The German custodians' implementation status varies - depending on the specific standard - within a range between 59% and 88%.

The majority of custodians confirms to meet the targets as defined by the milestones.

The vast majority of issuers confirm awareness of their obligations.

CSD – Clearstream Banking Frankfurt

CBF as CSD is fully on track. The CSD Clearstream Banking Frankfurt has already implemented 43.4 % of the standards and is on track with the remaining standards but further work is still required within the Asset Services Expert Group in some areas and considerable issues remain on specific standards.

Clearstream Banking Frankfurt currently remains on track to meet all implementation milestones, but is at risk of short-term slippage for those standards still under discussion (see milestone summary in section 2).

TPA – Clearstream Banking Frankfurt

Clearstream Banking Frankfurt as TPA is in the process of analysing the corporate actions standards relevant to triparty agents, but further work is still required within the Asset Services Expert Group in some areas and minor issues remain on some standards.

Implementation of the Corporate Action Standards in the German market is fully on track

CBF as CSD is on track

CBF as TPA is on track

Clearstream Banking Frankfurt as TPA currently remains on track to meet all implementation milestones, but is at risk of short-term slippage for those standards still under discussion (see milestone summary in section 2).

Custodians

The vast majority of custodians in the German market have commenced internal analysis

The vast majority of custodians in the German market have started internal analysis; however, their compliance status gives a mixed picture.

The highest compliance status of 88 % is achieved for standard 4 (rounding Rule 3 and rounding rule 4) and the lowest compliance status with 59 % for standard 15 (ISO 20022 messaging).

The current milestones 1 and 2 (analysis started and initial communication commenced) have been met by 38% of the custodians, while the final milestone 13 (SCoRE standards implemented) will presumably be met by 88% of the custodians.

The highest implementation status in the category “already implemented” is achieved for standard 4 (rounding rule 3) with 57 %.

Issuers

Vast majority of Issuers confirms awareness of obligation

Issuers were asked to confirm their awareness of their obligation to provide all relevant information to the Issuer CSD (on a Yes/No basis). Their confirmed awareness ranges - depending on the relevant standard – between 13% (standard 3 consistency of information) and 75 % (standard 6 business day rule).

NCB

Deutsche Bundesbank is on track to adopt the AMI-SeCo Standards by November 2023

Deutsche Bundesbank is on track to implement the AMI-SeCo Standards for Corporate Actions for its collateral management activities by November 2023.

SCoREBOARD

This section presents the overall compliance status in the market. CSDs and TPAs are monitored on an individual basis and are assigned a colour-code status in accordance with the methodology outlined in Box 1¹. Custodians and Issuers are monitored on an aggregated basis and assigned a percentage compliance status.

Box 1

SCoREBOARD – Implementation Phase



- 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

For custodians and issuers, progress is monitored and reported as a percentage; for example the % of custodians in a given market who have started internal adaptation of IT systems.

¹ For further details please refer to the [AMI-SeCo Monitoring Framework](#)

Table A
SCoREBOARD

STANDARD	Custodians	Issuers	CSD - Clearstream Banking Frankfurt	TPA - Clearstream Banking Frankfurt
1A: Notification	76%	23%	G	G
1B: Instruction	76%		G	G
1C: Advise	77%		G	G
1D: Confirmation	68%		G	G
1E: Reversal	78%		G	G
1F: Meeting Notification	64%	0%	G	G
1G: Meeting Instruction	64%		G	G
1H: Meeting Results	65%		G	G
2: Calculation of Proceeds	72%	25%	G	
3: Consistency of Information	73%	13%	G	
4: Rounding Rule 1	75%	38%	G	
4: Rounding Rule 2	81%	50%	G	
4: Rounding Rule 3	88%	38%	G	
4: Rounding Rule 4	88%	38%	G	
5: Negative Cash Flows	69%	13%	B	
6: Business Day Rule		75%	B	
7: Securities Amount Data		63%	G	
8: Payment Time Rule 1		50%	B	
8: Payment Time Rule 2		38%	G	
8: Payment Time Rule 3		63%	B	
9: Processing Status	81%	63%	G	
10: Blocking	81%		G	
11: Default Option	75%	50%	B	
12: Handling of Fees	75%		B	
13: Reversal	75%	38%	B	
14: Foreign Currency			B	
15: ISO 20022 Messaging	59%		G	

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 that the standard has either already been implemented, or that implementation is on track i.e. at a minimum that analysis has already started or that implementation has started per Standard.
- 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.
- A plausibility check was performed by the CMH-TF Secretariat.

2 Milestones

This section tracks an entity's progress in implementing the Standards on an ongoing basis. 13 milestones have been defined as listed in the box below.

Box 2

SCoRE Milestones

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)?	05/12/2022
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

Notes: N/A

Milestones expected to be achieved in the current reporting period are highlighted in blue in the header of Table B below. The blue colour-code is then assigned to those milestones which have been successfully achieved to date for each respective entity. Milestones which will only be achieved later are assigned a yellow status, while milestones which will only be achieved with significant delays / where work has not yet commenced are marked in red.

For the remaining milestones (i.e. milestones due to be achieved only after the current reporting cycle) the colour-code indicates an entity's expected ability to achieve a future milestone on time. The expected date of achievement is also indicated in the table if it is different to the milestone date defined by AMI-SeCo.

Table B
Milestones

	Custodians	CSD - Clearstream Banking Frankfurt	TPA - Clearstream Banking Frankfurt
Milestone 1 June 2020	38%	Yes	Yes
Milestone 2 March 2021	38%	Yes	Yes
Milestone 3 July 2021	38%	Yes	Yes
Milestone 4 December 2021	50%	Yes	Yes
Milestone 5 December 2021	50%	Yes	Yes
Milestone 6 January 2022	56%	Yes	Yes
Milestone 7 June 2022	56%	Yes	Yes
Milestone 8 July 2022	63%	Yes	Yes
Milestone 9 December 2022	69%	Yes	Yes
Milestone 10 December 2022	69%	Yes	Yes
Milestone 11 April 2023	75%	Yes	Yes
Milestone 12 October 2023	88%	Yes	Yes
Milestone 13 November 2023	88%	Yes	Yes

Notes: Actors were asked to report for all milestones, i.e. whether they meet the current milestone (1) and whether they expect to meet the dates for future milestones.

Summary

Milestones will be met by the majority of implementing actors in the German market.

Clearstream Banking Frankfurt provided the following information:

Considerable issues remain with Standard 6, Standard 8 and Standard 9 (which is dependent on the resolution of issues with Standard 8). Other issues also potentially remain for: Standard 1C,1E,1F and 1G, Standard 2, Standard 3, Standard 15 and the formatting and presentation of the document itself (e.g. implementation deadlines, section numbering, colouring of text, etc)

All major issues require resolution as soon as possible and in any case before the end of April 2021, in order to guarantee that there is no impacts on short-term milestones. Where internal requirements are delayed owing to lack of finality of standards, this will have a knock-on effect to our customers to whom we will not be able to confirm details of impacts, which in turn may impact their ability to be ready. We therefore advise that whilst milestones M2 - Analysis completed by 31/07/2021 and M3 - Documentation completed by 30/09/2021 are currently on track, they are at significant risk of slippage for the standards mentioned above until those standards become stable.

In summary, Clearstream Banking Frankfurt currently remains on track to meet all implementation milestones, but is at risk of short-term slippage for those Standards still under discussion.

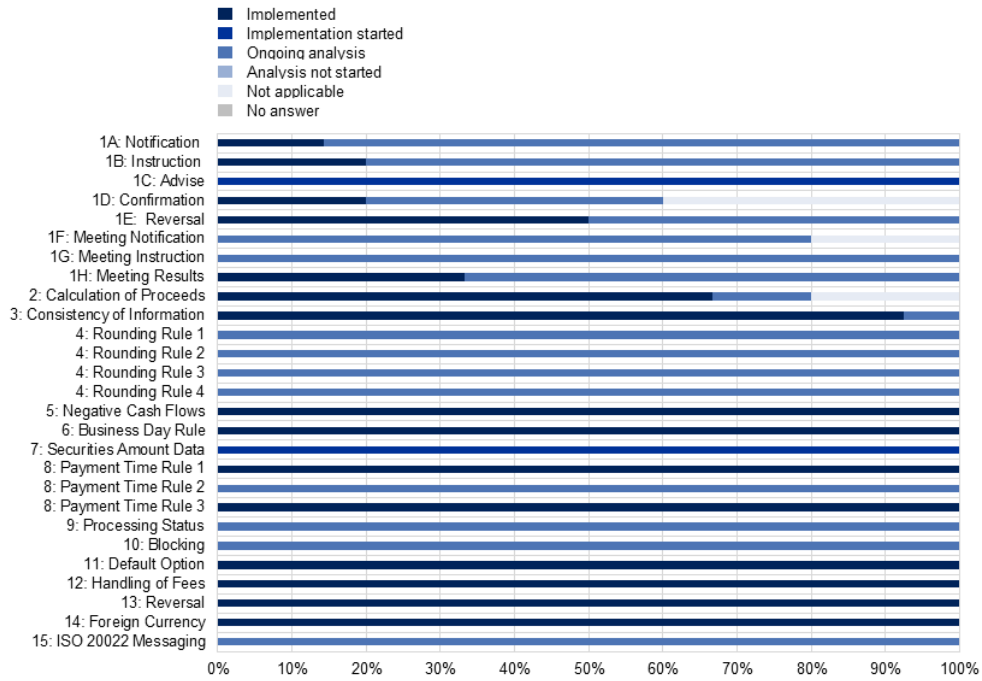
3

Implementation status per AMI-SeCo Standard

This section presents the implementation status of each Standard per entity type.

CSD – Clearstream Banking Frankfurt

Implementation status per AMI-SeCo Standard

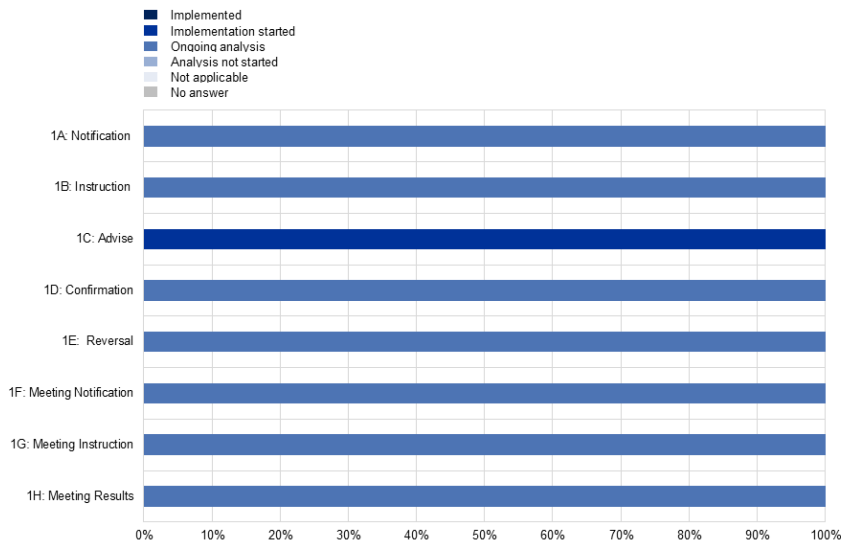


Notes

A plausibility check was performed by the CMH-TF Secretariat.

TPA - Clearstream Banking Frankfurt

Implementation status per AMI-SeCo Standard

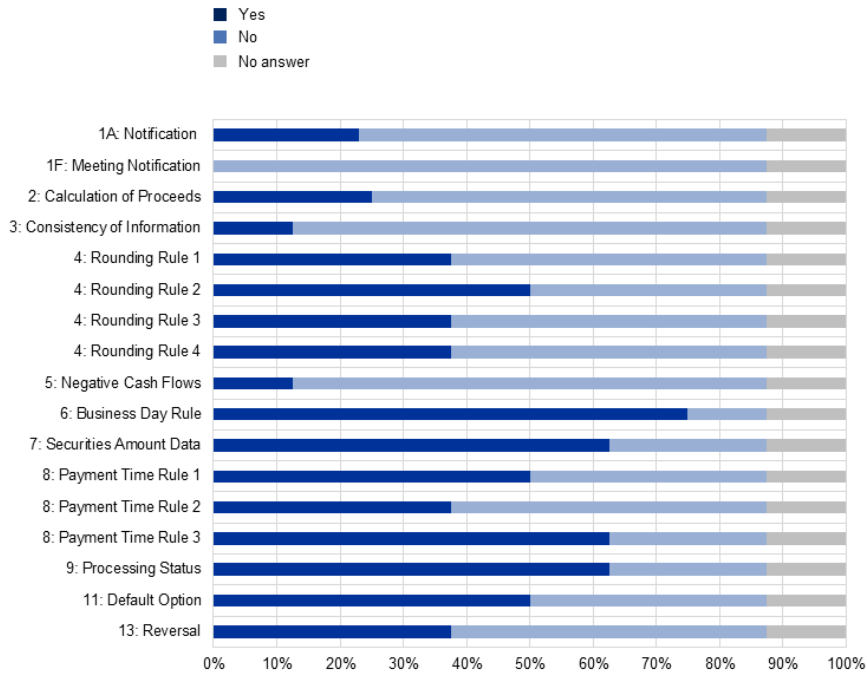


Notes

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Custodians

Implementation status per AMI-SeCo Standard

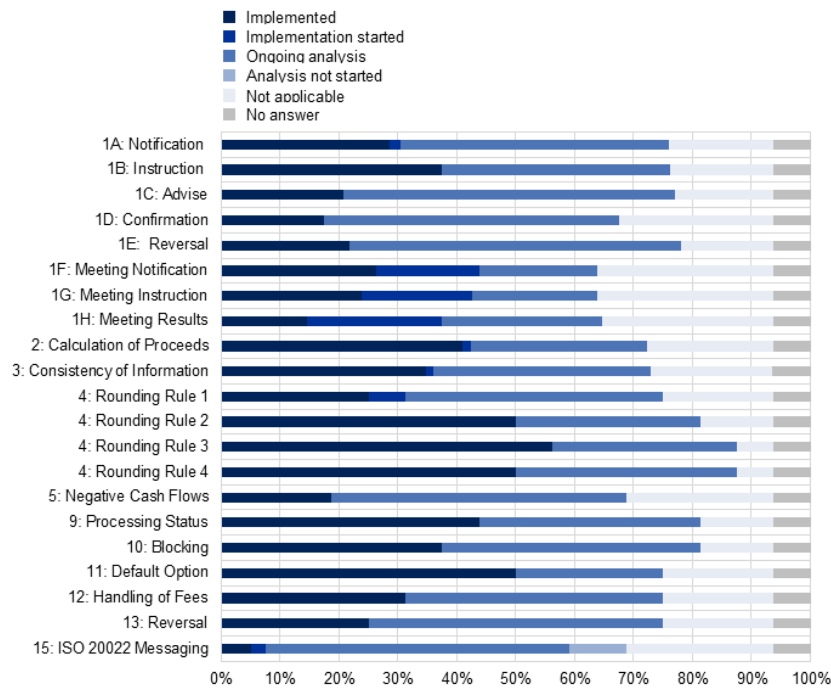


Notes

N/A

Issuers

Fulfilment of obligations per AMI-SeCo Standard



Notes

N/A

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The cut-off date for the data included in this report was 21 May 2021.

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