

Billing Processes Adaptation Plan

Euronext Securities Milan

Activity	Billing Processes
Plan submitted by	Euronext Securities Milan
NSG	Italy
Date	October 2022

Background

The Adaptation Plan provides information on the changes which will be implemented to meet the AMI-SeCo Standards for Billing Processes which form part of the Single Collateral Management Rulebook for Europe (SCoRE). Full details of the Billing Processes Standards can be found on the [ECB website](#).

The document is structured as follows: Section 1 (Cover Letter) provides a high-level summary of the changes in order to implement the AMI-SeCo Standards. Section 2 (Adaptation Plan Table) then provides a more detailed overview per Standard covering a feasibility assessment and the implementation milestones.

1 Cover Letter

Following the high level analysis and initial user communication in 2020/2021, Euronext Securities Milan has now completed the detailed requirements definition and analysis and is currently in the development phase.

We are committed to meet the go-live date of the proposed plan, albeit with a remodulation of intermediate milestones, following re-planning of the project.

According to the detailed analysis performed, Euronext Securities Milan has to perform the following adaptations:

- Standard 1: implementation of the issue and sending of the ISO 20022 message;
- Standard 4: adaptation of the payment date.

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

2 Adaptation Plan Table

AMI-SeCo Standard			Feasibility Assessment			Implementation Milestones																																																																
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1	Implementation of ISO 20022 messages for billing processes	<i>Dissemination of billing information shall be offered using an ISO 20022 message.</i>	Adaptation Required	<p>Implementation of the adoption of the ISO 20022 message in addition to the current invoice sent in electronic format and valid at fiscal purpose; based on the layout of the camt.077 message a unique message will be sent for each electronic invoice valid at fiscal purpose as the message will report for each service category the account details.</p> <p>The following adaptations have been identified so far:</p> <ol style="list-style-type: none"> 1) to group the single invoicing codes according to service categories as defined by CMH Expert Group Asset Servicing; 2) as Euronext Securities Milan clients may be both intermediaries (account owners) and securities issuers (issue account holders), Euronext Securities Milan has decided, in agreement with its clients, to send billing information only at account level in relation to fees applied to intermediaries; the provision of information of custody fees per account owner is not in line with the application of regressive fees to the sum of assets deposited in all the accounts held by the client and, in case of Euronext Securities Milan custody fees, by clients that are part of the same group; the standard requires a specific process for the calculation of the average fee applied at account level; 3) implementation of a process with clients to receive their request of adjustments for errors by the 15th calendar day of the month; 4) in case or errors in the invoice, management of the adjustments only through credit/debit notes in the successive invoicing cycle (next month) and reported as a correction in the corresponding ISO 20022 message or in a following month for request of adjustment sent after the 15th calendar day of the month of invoice receipt. 		<table border="1"> <thead> <tr> <th>Analysis and Communication</th> <th>Yes</th> <th>No</th> 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2	Harmonised billing cycles	Billing information shall be provided on a monthly basis. The billing period shall be from the first day of the month to the last day of the month inclusive.	Implemented	no change		Analysis and Communication				
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3	Cut-off date for provision of billing information by (I)CSDs	(I)CSDs shall provide billing information to their clients no later than the 8th (or next business day) of the month for fees related to depository services and/or triparty collateral management services.	Implemented	no change		Analysis and Communication				
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4	Harmonised dates for payment of fees to (I)CSDs	<i>Cash payments to the (I)CSDs shall be processed on the 15th (or next business day) of each month for fees related to depository services and/or triparty collateral management services.</i>	Adaptation Required	<p>Currently the payment of the unique invoice issued at participant level for all services is instructed by Euronext Securities Milan via direct debit through SEPA on the last business day of the month following the date of the invoice. The current invoice date is the last day of the month.</p> <p>The payment on the 15th day of the same month of invoice provision represents an issue due to monthly accounting cut-off and times required by banks for payment instructions through SEPA, in particular in case of new clients. Therefore the payment on the 15th will only concern invoices to clients having the role of intermediaries, of course for all fees applied to them for all services provided, being the invoices issued at client level.</p> <p>This direct debit via SEPA is reported in Euronext Securities Milan pricing list, part of the contractual documentation, and is not bilaterally agreed with each clients: the clients must assign the mandate to Euronext Securities Milan for the payment.</p> <p>The direct debit as default method of payment and without bilaterally agreement with each client is considered in line with the standard.</p>		<table border="1"> <thead> <tr> <th colspan="4">Analysis and Communication</th> </tr> <tr> <th></th> <th>Yes</th> <th>No</th> <th>n/a</th> </tr> </thead> <tbody> <tr> <td>M1: Analysis started by 30/06/2020</td> <td><input checked="" type="checkbox"/></td> <td><input type="checkbox"/> DD-MM-YYYY</td> <td><input type="checkbox"/></td> </tr> <tr> <td>M2: Initial communication 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