

# SCoREBOARD

## Corporate Actions – H2 2022

Belgian 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. They have been established in the markets covered by the AMI-SeCo in order to support the implementation of the Single Collateral Management Rulebook for Europe (SCoRE).

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 Belgian NSG. The NSG covers among the following stakeholders:

- 3 CSDs – Euroclear Bank, Euroclear Belgium, NBB-SSS
- 2 TPAs – BNY Mellon, Euroclear Bank

- 5 Custodians
- 4 Issuers

This report focuses on the milestones to be met by the time the survey was 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 the compliance status with the standards by each entity type. Section 3 focuses on the progress against the individual milestones and Section 4 provides concluding remarks.




## 1 Key takeaways

Implementation of the Corporate Action Standards in the Belgian market is currently partly on track

Implementation of the Corporate Actions Standards in the Belgian market is partly on track. The Belgian CSDs and TPAs have all met the first two milestones and the majority is on track to meet all future milestones. One CSD (NBB-SSS) has already implemented most of the SCoRE Standards which are relevant for its current functionalities but reports later dates for new functionalities, which in turn affects timely implementation of some of the applicable Standards by November 2023.

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

**Figure 1**  
**Summary of the monitoring exercise**

	 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	80%	Implemented 25.1% Implementation started 1.15% Analysis started 28.0% Analysis not started 3.73% Non applicable standards 21.8% Replies not submitted 20%	Average % of milestones achieved 40%	% of custodians on time 60%
Issuers	75%	Aware of obligations 43.9% Not aware of obligations 31.0% Replies not submitted 25%	NA (milestones irrelevant for issuers)	NA

TPA - BNY Mellon	Survey submitted	Implemented 62.5% Implementation started 0% Analysis started 0% Analysis not started 0% Non applicable standards 37.5% Replies not submitted 0%	Yes	Yes
TPA - Euroclear Bank	Survey submitted	Implemented 100% Implementation started 0% Analysis started 0% Analysis not started 0% Non applicable standards 0% Replies not submitted 0%	Yes	Yes
CSD - Euroclear Bank	Survey submitted	Implemented 33.1% Implementation started 63.4% Analysis started 0% Analysis not started 0% Non applicable standards 3.40% Replies not submitted 0%	Yes	Yes
CSD - Euroclear Belgium	Survey submitted	Implemented 67.6% Implementation started 28.0% Analysis started 0.42% Analysis not started 0% Non applicable standards 3.82% Replies not submitted 0%	Yes	Yes
CSD - NBB-SSS	Survey submitted	Implemented 13.6% Implementation started 4.25% Analysis started 29.7% Analysis not started 0.85% Non applicable standards 51.4% Replies not submitted 0%	No	11/25

### **CSD - Euroclear Bank**

Euroclear Bank reports a high-level of compliance with the Standards

Euroclear Bank reports a high level of compliance with the Corporate Action Standards. More than 33% of the Standards was already implemented. Most of the non-implemented Standards (63%) are currently being implemented.

Milestones 1 to 8 are being met and Euroclear Bank is on track to meet all future milestones.

### **CSD - Euroclear Belgium**

Euroclear Belgium implementation is fully on track

In total, Euroclear Belgium is already fully compliant with 10 of the 15 Standards. The remaining standards are currently being implemented or under analysis in view of achieving full compliance by November 2023.

Milestones 1 to 8 are being met and Euroclear Belgium is on track to meet all future milestones.

### **CSD - NBB-SSS**

NBB-SSS implementation is partly on track

NBB-SSS is already fully compliant with 6 of the 15 Standards. Standard 3 (Consistency of Information) is not applicable to NBB-SSS as it only acts as an Issuer CSD.

Milestones 1, 2, 6 and 8 are being met. Later dates are reported for 9 past and future milestones with the result that full compliance is not envisaged until 2025 which is later than the date agreed by AMI-SeCo. The milestone regarding the start of the internal testing (8) is on track.

### **TPA - BNY Mellon**

BNY Mellon TPA implementation is on track

As a TPA, Standards 1A to 1H are of relevance to BNY Mellon. All applicable standards are implemented; Standards 1F, 1G and 1H are not applicable since these messages are not part of the collateral management product offering.

Milestones 1 to 8 are being met and BNY Mellon is on track to meet all future milestones

### **TPA - Euroclear Bank**

Euroclear Bank TPA implementation is on track

As a TPA, Standards 1A to 1H are of relevance to Euroclear Bank. All the Standards are implemented. Euroclear Bank met all past milestones and remains on track to meet all future milestones.

### **Custodians**

Most of the custodians have commenced internal analysis of most of the standards

The level of compliance varies significantly across the different Standards. The lowest levels of compliance are observed with Standards 1F, 1H, 5, 9, 10, 12, 13, 15. While most of the reporting entities have at least started internal analysis, there is one custodian that reported 'not applicable' for most of the Standards. This custodian argues that the Corporate Actions Standards are not applicable since they will not be

using ISO 20022 messages. Two custodians have not started the analysis with regard to the ISO 20022 messaging Standard 15.

In general, there is evidence of engagement by Belgian custodians in the process with the majority of Standards yet to be implemented currently in the process of being analysed. Nonetheless, the milestone reporting identifies the needs for further future efforts in view of achieving full compliance with the Standards in accordance with the timeframe agreed by AMI-SeCo.

### Issuers

Half of the monitored issuers in the Belgian market exhibit a high level of awareness of their obligations under the SCoRE Corporate Action Standards. Nonetheless, the monitoring exercise highlights that some further work could be envisaged to increase issuer awareness as well as to involve the other issuers.

### NCB

National Bank of Belgium is on track to implement the SCoRE Standards for Corporate Actions for its collateral management activities by November 2023.

50% of the issuers exhibit awareness of obligations

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

## 2 Compliance level with the standards

This section provides an overview of the current status of compliance with the billing processes 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 are too many to represent individually. Thus the replies of custodians 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 logo for SCoREBOARD features the letters 'S', 'C', 'R', 'E', 'B', 'O', 'A', 'R', 'D' in a blue, sans-serif font. The letter 'O' is replaced by a cluster of five colored dots: a blue dot at the top, a green dot at the bottom left, a yellow dot at the bottom center, and two orange dots at the bottom right.

SINGLE COLLATERAL MANAGEMENT RULEBOOK  
FOR EUROPE

- 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	TPA - BNY Mellon	TPA - Euroclear Bank	CSD - Euroclear Bank	CSD - Euroclear Belgium	CSD - NBB-SSS
1A: Notification	46%	38%	B	B	G	G	Y
1B: Instruction	31%		B	B	G	G	Y
1C: Advise	32%		B	B	G	G	B
1D: Confirmation	37%		B	B	G	G	Y
1E: Reversal	30%		B	B	G	G	G
1F: Meeting Notification	20%	25%	N/A	B	G	B	Y
1G: Meeting Instruction	22%		N/A	B	G	B	Y
1H: Meeting Results	20%		N/A	B	G	B	Y
2: Calculation of Proceeds	33%	25%			G	G	Y
3: Consistency of Information	25%	25%			G	G	N/A
4: Rounding Rule 1	60%	50%			G	B	B
4: Rounding Rule 2	60%	50%			G	B	N/A
4: Rounding Rule 3	60%	50%			B	B	N/A
4: Rounding Rule 4	40%	50%			G	B	B
4: Rounding Rule 5	60%	50%			B	B	B
5: Negative Cash Flows	20%	25%			B	B	B
6: Business Day Rule		50%			B	B	B
7: Securities Amount Data Rule 1		50%			B	B	B
7: Securities Amount Data Rule 2		50%			B	B	N/A
7: Securities Amount Data Rule 3		50%			B	B	N/A
7: Securities Amount Data Rule 4		50%			B	B	N/A
8: Payment Time Rule 1		50%			B	B	B
8: Payment Time Rule 2		50%			B	B	B
8: Payment Time Rule 3		75%			G	B	B
8: Payment Time General Principle 3		75%			B	B	B
9: Processing Status	0%	50%			B	B	Y
10: Rule 1	20%				B	B	Y
10: Rule 2	20%				B	B	R
10: Rule 3	20%				B	B	R
11: Default Option	60%	50%			B	B	Y
12: Handling of Fees	20%				G	Y	Y
13: Reversal	0%	25%			B	B	G
14: Foreign Currency					B	B	B
15: ISO 20022 Messaging	12%				G	G	Y

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 percentage of custodians which have implemented standards / standards being 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 20 November 2023 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?	02/12/2022
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)?	20/03/2023
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?	01/04/2023
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)?	13/10/2023
M13	<b>SCoRE Standards Implemented:</b> 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**  
Expectation of achieving the milestones at the set dates

	Custodians	TPA - BNY Mellon	TPA - Euroclear Bank	CSD - Euroclear Bank	CSD - Euroclear Belgium	CSD - NBB-SSS
Milestone 1 June 2020	60%	Yes	Yes	Yes	Yes	Yes
Milestone 2 March 2021	60%	Yes	Yes	Yes	Yes	Yes
Milestone 3 July 2021	20%	Yes	Yes	Yes	Yes	07/23
Milestone 4 December 2021	20%	Yes	Yes	Yes	Yes	12/23
Milestone 5 December 2021	20%	Yes	Yes	Yes	Yes	12/23
Milestone 6 January 2022	80%	Yes	Yes	Yes	Yes	Yes
Milestone 7 June 2022	20%	Yes	Yes	Yes	Yes	11/25
Milestone 8 July 2022	40%	Yes	Yes	Yes	Yes	Yes
Milestone 9 December 2022	20%	Yes	Yes	Yes	Yes	11/25
Milestone 10 March 2023	40%	Yes	Yes	Yes	Yes	07/22
Milestone 11 April 2023	20%	Yes	Yes	Yes	Yes	10/25
Milestone 12 October 2023	40%	Yes	Yes	Yes	Yes	10/25
Milestone 13 November 2023	60%	Yes	Yes	Yes	Yes	11/25

Notes:  
Milestone 3 could not be achieved on time due to ongoing discussions on the Corporate Action Rulebook. AMI-SeCo finalised the updates to the Rulebook in December 2021.



## 4 Concluding remarks

According to the indicators, the majority of entities in the Belgian market will be fully compliant in accordance with the implementation timeline agreed by AMI-SeCo. NBB-SSS and one custodian are the only entities that reported a delay in the implementation of some of the Corporate Action Standards by November 2023. The impact is expected to be limited since the delay is related to the implementation of corporate action events that rarely occur in NBB-SSS.

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