

SCoREBOARD

Corporate Actions –H1 2023

Bulgarian 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 Bulgarian NSG with the involvement among the following stakeholders:

13 entities are monitored in the Bulgarian market

- 2 CSDs – CD AD, BNBGSSS
- 6 Custodians
- 5 Issuers

The 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 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 provides an overview of the progress against the individual milestones and Section 4 focuses on concluding remarks.




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Key takeaways

Both CSDs, representative custodians and issuers in the Bulgarian market participate in the H1 2023 monitoring exercise

Both CSDs, representative custodians and issuers participate in the H1 2023 monitoring exercise. The process of putting in place the necessary reporting structure and facilitating communication in order to ensure full coverage of participation continues. As a result, the participation rate for custodians, issuers and CSDs are 50%, 100% and 100%, respectively. 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 9 inclusive achieved?	Will the last milestone 13 be implemented on time (i.e. by 08 April 2024)?
Custodians	50%	Implemented 22.0% Implementation started 20.4% Analysis started 1.55% Analysis not started 0% Non applicable standards 5.92% Replies not submitted 50%	Average % of milestones achieved 31%	% of custodians on time 33%
Issuers	100%	Aware of obligations 81.2% Not aware of obligations 18.7% Replies not submitted 0%	NA (milestones irrelevant for issuers)	NA
CSD - BNBGSSS	Survey submitted	Implemented 6.38% Implementation started 9.78% Analysis started 3.82% Analysis not started 0% Non applicable standards 80% Replies not submitted 0%	Yes	12/24
CSD - CD AD	Survey submitted	Implemented 48.0% Implementation started 40.4% Analysis started 0% Analysis not started 0% Non applicable standards 11.4% Replies not submitted 0%	Yes	Yes

CSD – CD AD

CD AD implementation is currently on track

CD AD is compliant with 7 of the 15 Corporate Actions Standards. For standards 1, all sub-standards are met with exception of 1B and 1C. The implementation of these two sub-standards is on schedule. Work on the implementation of Standards 2, 3, 9, 11 and 15 is already underway.

CSD – BNBGSSS

BNBGSSS implementation is currently on track

BNBGSSS only acts as Issuer CSD for government bonds. Accordingly, it reports that a large proportion of the Standards are not applicable to the activities covered by the CSD. The applicable standards are already implemented or work on analysing and implementing is underway.

Custodians

Custodians participation continues in the H1 2023 exercise

At the time of H1 2023 SCoRE monitoring exercise the process of facilitating communication in order to ensure full coverage of participation continues, thus insuring input from the custodian community. Most of the applicable standards are already implemented or work on analysing and implementing is underway.

Issuers

Issuers participation continues in the H1 2023 exercise

At the time of H1 2023 SCoRE monitoring exercise the process of putting in place the necessary reporting structure in order to ensure full coverage of participation continues, thus ensuring complete input from the Issuers community. Awareness of their obligation to provide information to the Issuer CSD is confirmed for most of the applicable standards.

2 Compliance 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 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 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 - BNBGSSS	CSD - CD AD
1A: Notification	50%	90%	G	B
1B: Instruction	46%		N/A	G
1C: Advise	37%		G	G
1D: Confirmation	41%		G	B
1E: Reversal	33%		G	B
1F: Meeting Notification	49%	80%	N/A	B
1G: Meeting Instruction	46%		N/A	B
1H: Meeting Results	43%		N/A	B
2: Calculation of Proceeds	47%	80%	G	G
3: Consistency of Information	48%	80%	B	G
4: Rounding Rule 1	40%	100%	B	B
4: Rounding Rule 2	40%	100%	B	B
4: Rounding Rule 3	50%	100%	B	B
4: Rounding Rule 4	40%	80%	G	B
4: Rounding Rule 5	40%	80%	B	B
5: Negative Cash Flows	40%	60%	Y	N/A
6: Business Day Rule		100%	B	B
7: Securities Amount Data Rule 1		100%	B	B
7: Securities Amount Data Rule 2		60%	N/A	B
7: Securities Amount Data Rule 3		60%	N/A	B
7: Securities Amount Data Rule 4		60%	N/A	B
8: Payment Time Rule 1		80%	B	B
8: Payment Time Rule 2		60%	N/A	B
8: Payment Time Rule 3		80%	B	B
8: Payment Time General Principle 3		80%	B	B
9: Processing Status	50%	80%	Y	G
10: Rule 1	50%		N/A	B
10: Rule 2	50%		N/A	B
10: Rule 3	40%		N/A	B
11: Default Option	50%	80%	N/A	G
12: Handling of Fees	25%		N/A	N/A
13: Reversal	50%	80%	G	B
14: Foreign Currency			N/A	B
15: ISO 20022 Messaging	40%		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.
- 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. NA responses are not included.
- 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	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?	10/03/2023
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)?	22/05/2023
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?	22/05/2023
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)?	16/02/2024
M13	SCoRE Standards Implemented: 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 - BNBGSSS	CSD - CD AD
Milestone 1 June 2020	33%	Yes	Yes
Milestone 2 March 2021	17%	Yes	Yes
Milestone 3 July 2021	33%	Yes	Yes
Milestone 4 December 2021	33%	Yes	Yes
Milestone 5 December 2021	33%	Yes	Yes
Milestone 6 January 2022	33%	Yes	Yes
Milestone 7 June 2022	33%	Yes	Yes
Milestone 8 July 2022	33%	Yes	Yes
Milestone 9 March 2023	33%	Yes	Yes
Milestone 10 May 2023	33%	12/23	Yes
Milestone 11 May 2023	33%	03/24	Yes
Milestone 12 February 2024	33%	10/24	Yes
Milestone 13 April 2024	33%	12/24	Yes

4 Concluding remarks

Overall compliance is expected in accordance with the timelines agreed by AMI-SeCo and final milestones are foreseen in accordance with the euro area deadlines.

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