

# SCoREBOARD

## Corporate Actions – H1 2023

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 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 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

14 entities are monitored in the Belgian NSG

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 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 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 April 2024.

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 9 inclusive achieved?	Will the last milestone 13 be implemented on time (i.e. by 08 April 2024)?
Custodians	80%	Implemented 24.9% Implementation started 3.82% Analysis started 25.1% Analysis not started 4.17% Non applicable standards 21.8% Replies not submitted 20%	Average % of milestones achieved 40%	% of custodians on time 20%
Issuers	75%	Aware of obligations 43.9% Not aware of obligations 31.0% Replies not submitted 25%	NA (milestones irrelevant for issuers)	NA

	 <b>Response Rate</b>	 <b>Implementation Status of the standards</b>	<b>Are all milestones 1 to 9 inclusive achieved?</b>	<b>Will the last milestone 13 be implemented on time (i.e. by 08 April 2024)?</b>
CSD - Euroclear Bank	Survey submitted	Implemented 33.1% Implementation started 62.5% Analysis started 0.85% Analysis not started 0% Non applicable standards 3.40% Replies not submitted 0%	Yes	Yes
CSD - Euroclear Belgium	Survey submitted	Implemented 56.1% Implementation started 27.6% Analysis started 12.3% Analysis not started 0% Non applicable standards 3.82% Replies not submitted 0%	Yes	Yes
CSD - NBB-SSS	Survey submitted	Implemented 14.8% Implementation started 3.40% Analysis started 28.9% Analysis not started 0% Non applicable standards 52.7% Replies not submitted 0%	No	11/25
TPA - BNY Mellon	Survey submitted	Implemented 62.5% Implementation started 0% Analysis started 37.5% Analysis not started 0% Non applicable standards 0% 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**

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 are already implemented. Most of the non-implemented Standards (63%) are currently being implemented.

Milestones 1 to 8 have been 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 8 of the 15 Standards. The remaining standards are currently being implemented or under analysis in view of achieving full compliance by April 2024.

Milestones 1 to 8 have been 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 4 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 have been met. Later dates are reported for the remaining milestones (except milestone 10) with the result that full compliance is not envisaged until November 2025 which is later than the date agreed by AMI-SeCo.

### **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 have or are being implemented.

Milestones 1 to 9 have been implemented 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

50% of the issuers exhibit awareness of obligations

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 adopt the SCoRE Standards in April 2024

National Bank of Belgium is on track to implement 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 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 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 - Euroclear Bank	CSD - Euroclear Belgium	CSD - NBB-SSS	TPA - BNY Mellon	TPA - Euroclear Bank
1A: Notification	56%	38%	G	G	Y	B	B
1B: Instruction	51%		G	G	Y	B	B
1C: Advise	48%		G	G	B	B	B
1D: Confirmation	53%		G	G	Y	B	B
1E: Reversal	52%		G	G	G	B	B
1F: Meeting Notification	29%	25%	G	Y	Y	Y	B
1G: Meeting Instruction	32%		G	Y	Y	Y	B
1H: Meeting Results	29%		G	Y	Y	Y	B
2: Calculation of Proceeds	41%	25%	Y	G	Y		
3: Consistency of Information	31%	25%	G	G	N/A		
4: Rounding Rule 1	50%	50%	G	B	B		
4: Rounding Rule 2	50%	50%	G	B	N/A		
4: Rounding Rule 3	40%	50%	B	B	N/A		
4: Rounding Rule 4	50%	50%	G	B	B		
4: Rounding Rule 5	50%	50%	B	B	B		
5: Negative Cash Flows	25%	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	Y	B		
8: Payment Time Rule 2		50%	B	Y	B		
8: Payment Time Rule 3		75%	G	Y	B		
8: Payment Time General Principle 3		75%	B	Y	B		
9: Processing Status	25%	50%	B	Y	Y		
10: Rule 1	25%		B	B	Y		
10: Rule 2	25%		B	B	N/A		
10: Rule 3	25%		B	B	N/A		
11: Default Option	75%	50%	B	B	Y		
12: Handling of Fees	25%		Y	Y	N/A		
13: Reversal	0%	25%	B	B	G		
14: Foreign Currency			B	B	B		
15: ISO 20022 Messaging	27%		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 % 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**  
Expectation of achieving the milestones at the set dates

	Custodians	CSD - Euroclear Bank	CSD - Euroclear Belgium	CSD - NBB-SSS	TPA - BNY Mellon	TPA - Euroclear Bank
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	07/23	Yes	Yes
Milestone 4 December 2021	40%	Yes	Yes	12/24	Yes	Yes
Milestone 5 December 2021	40%	Yes	Yes	12/23	Yes	Yes
Milestone 6 January 2022	60%	Yes	Yes	Yes	Yes	Yes
Milestone 7 June 2022	20%	Yes	Yes	11/25	Yes	Yes
Milestone 8 July 2022	40%	Yes	Yes	Yes	Yes	Yes
Milestone 9 March 2023	20%	07/23	07/23	11/25	Yes	Yes
Milestone 10 May 2023	40%	07/23	07/23	Yes	Yes	Yes
Milestone 11 May 2023	20%	Yes	Yes	10/25	Yes	Yes
Milestone 12 February 2024	40%	Yes	Yes	10/25	Yes	Yes
Milestone 13 April 2024	20%	Yes	Yes	11/25	Yes	Yes

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 three custodians are the only entities that reported a delay in the implementation of some of the Corporate Action Standards by April 2024. 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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