



EUROPEAN CENTRAL BANK

EUROSYSTEM

Eighth T2S Harmonisation Progress Report

Advisory Group on
Market Infrastructures for
Securities and Collateral

harmonisation.t2s.eu

31 January 2018

Contents

Foreword	3
Key messages	5
1 Introduction	7
2 Overview	10
3 T2S harmonisation activities – priority 1	21
3.1 T2S ISO 20022 messages	21
3.2 T2S matching fields	23
3.3 Interaction with T2S (registration procedures)	24
3.4 Interaction with T2S (tax info requirements)	26
3.5 T2S schedule for the settlement day and calendar	27
3.6 T2S corporate actions standards	30
3.7 Settlement Finality I	33
3.8 Settlement Finality II	35
3.9 Settlement Finality III	37
3.10 IT outsourcing (settlement services)	39
3.11 Settlement discipline regime	40
3.12 Settlement cycles	42
3.13 Availability of omnibus accounts	43
3.14 Restrictions on omnibus accounts	45
3.15 Securities account numbers	46
3.16 Cash account numbers	47
4 T2S harmonisation activities – priority 2	50
4.1 Location of securities accounts/conflict of laws	50
4.2 Corporate actions market standards	52
4.3 Place of issuance	54
4.4 Withholding tax procedures	56

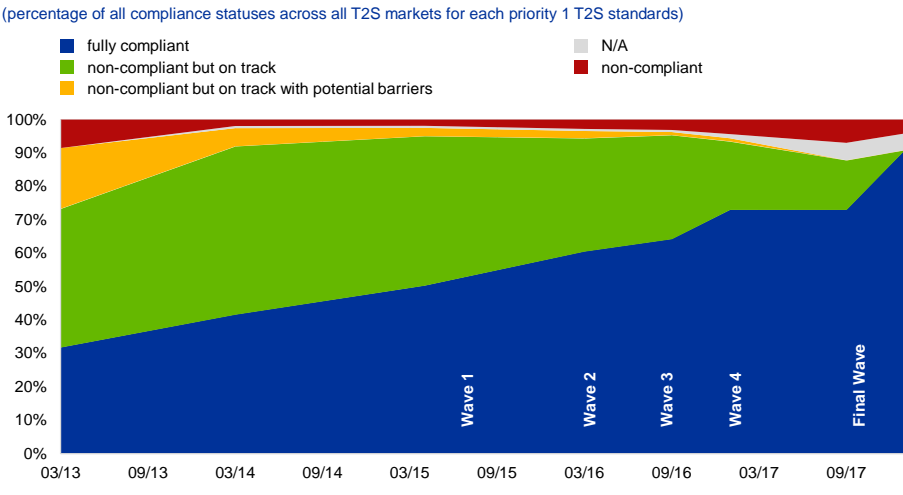
4.5	Cross-border shareholder transparency and registration procedures	59
4.6	Market access and interoperability	62
4.7	Securities amount data	64
4.8	Portfolio transfer	65
	Annex 1 Methodology	67
	Annex 2 Monitored harmonisation activities by market	72
	Annex 3 Non-compliance impact analysis	77
	Annex 4 Detailed monitoring information per T2S market	81
	Annex 5 List of members of the Advisory Group on Market Infrastructures for Securities and Collateral	127

Foreword

On 18 September 2017 the final wave of migration to T2S was completed, marking the final major milestone in the project launched by the ECB’s Governing Council almost ten years ago. This milestone represents a major success for the T2S Community and is a cornerstone of the integration of European securities markets. I recall that at the start of this work the community had to contend with extremely heterogeneous post-trade market practices across European markets and it was not always easy to convince all stakeholders to invest in harmonisation. However, in the context of the work on T2S, everyone realised that moving towards a common goal and working for the common good would bring benefits to all. The predecessor of the AMI-SeCo, the T2S Advisory Group, published the first T2S harmonisation progress report in July 2011 (four years before T2S went live) noting that market stakeholders viewed harmonisation as a key driver “for the maximisation of T2S’ added value to their business models”. In fact, T2S and the huge amount of related work on post-trade harmonisation done since then has provided a solid basis for European post-trade harmonisation, thereby making a significant contribution to further European economic integration. This contribution is now probably even more important in the context of the European Commission’s Capital Markets Union initiative.

This eighth T2S harmonisation progress report covers the final migration wave to T2S and provides an overview of the progress made towards the implementation of the T2S harmonisation agenda by the end of 2017. It also presents an opportunity to look back at and reflect on the progress achieved by the T2S Community over the last six years or more. The chart below shows the progress made towards compliance with priority 1 T2S harmonisation standards since the publication of the third progress report in 2013 (where the current methodology was first used).

Chart 1
 The evolution of the overall level of compliance with priority 1 T2S harmonisation standards



The above chart shows that very significant progress has been made by the T2S Community in defining, monitoring and complying with the T2S harmonisation standards. On behalf of the Eurosystem, I would very much like to thank the participating CSDs, NCBs, NSGs, CSD participants, and all other relevant stakeholders for their efforts in making this achievement possible.

However, this eighth progress report also shows that a lot remains to be done to achieve a fully integrated post-trade marketplace in Europe. In particular, further efforts are required from public authorities and market stakeholders in the areas of corporate actions, legal harmonisation, withholding tax and cross-border shareholder registration. The AMI-SeCo stands ready to offer further support and to catalyse this work, which has gained significant momentum thanks to recent EU Commission initiatives. Furthermore, the AMI-SeCo is also working on deepening the market-driven harmonisation in respect of collateral management practices in the post-trade domain. This work – supported by a very wide range of stakeholders as well as by the relevant Eurosystem initiative regarding the Eurosystem Collateral Management System – is also expected to result in the definition of additional harmonisation activities in the near term.

Finally, since completion of T2S migration sees us entering a new era, the AMI-SeCo will reflect on how to adapt its harmonisation monitoring activities to the new environment. This review may change the way the AMI-SeCo communicates about its harmonisation activities in the future.

Marc Bayle de Jessé, Chairman of the Advisory Group on Market Infrastructures for Securities and Collateral (AMI-SeCo)

Key messages

- **T2S migration is now complete – the final migration wave was successfully executed in September 2017.** Over the last two years, 22 CSDs¹ in 20 markets have migrated to T2S in five waves. The completion of T2S migration has greatly contributed to the progress made in harmonisation to comply with T2S standards and, more broadly, to the integration of post-trade services in the EU.
- **This report shows that T2S markets have taken major steps towards full compliance with the T2S harmonisation standards in the period covered.** The current results show an increase of 15 percentage points in full compliance statuses compared with the mid-year report published on 15 September 2017. This improvement is due to the successful completion of the final wave of T2S migration, as well as the further harmonisation efforts made by the T2S Community in general.
- **All T2S markets are now fully compliant with the priority 1 harmonisation standard relating to settlement finality 1** (moment of entry of a transfer order into the system) with the signing and entry into force of the “Collective Agreement” between T2S-participating CSDs and NCBs.
- **The four markets that migrated to T2S in the final wave show a high degree of post-migration compliance.** EE, ES, LV and LT achieved a very high degree of compliance following their successful migration.
- **Corporate actions remain an area with a relatively high level of non-compliance across T2S markets. However, there has been significant progress towards compliance with individual T2S corporate actions (CA) standards.** Several T2S markets are currently assessed as being non-compliant with T2S corporate actions standards. This would appear to confirm that corporate actions are a difficult area, with complex business processes for asset servicing involving rules and procedures developed by a range of different actors.² Nevertheless, it should be noted that significant progress has been achieved by the T2S markets even in this area – after migration of the final wave T2S markets are now fully compliant with 89% of the individual T2S CA Standards, compared with 71% as of June 2017.

¹ For methodological reasons and to allow comparison with previous compliance assessments – although they legally merged into one single CSD (Nasdaq CSD SE) operating three SSSs upon completion of their T2S migration in September 2017 – the Baltic markets (EE, LT and LV) continue to be reported and assessed for the purpose of this report as three CSDs.

² It should be noted that the heterogeneity of corporate actions procedures has also been identified as a significant operational barrier to the integration of European post-trade markets by the European Post Trade Forum (EPTF) set up by the European Commission in the context of its Capital Markets Union initiative. For further details please see [the final report of the EPTF](#) and the related [public consultation launched by the European Commission](#) in August 2017.

- In line with the T2S community needs, the T2S calendar is being subject to revision with implications on the compliance monitoring of the T2S standard on the T2S calendar.** In Q2 2017 eleven of the T2S markets that had already migrated were closed on the three T2S opening days when T2 was closed (Good Friday, Easter Monday and 1 May) and were therefore not compliant with the T2S standard on the T2S calendar. Having discussed several options to ensure a fully harmonised implementation of the single T2S calendar, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S has to be open when any of the T2S settlement currency RTGSs are open. This means that, as of 2019, T2S will be closed on Good Friday and Easter Monday (1 May is a settlement day for Danish Kroner, T2S settlement currency as of October 2018). Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
- With regards to the progress on definition of T2S standards the AMI-SeCo acknowledges the progress and on-going work of EU lawmakers,** especially in the field of T2S harmonisation activities related to CSDR Level II regulatory standards (settlement discipline regime, place of issuance and market access) as well as relevant EU Commission initiatives (consultation and work on conflict of laws). In this regard the AMI-SeCo wishes to highlight the importance of maintaining momentum on the CSDR Level II buy-in rules related to settlement discipline, as well as withholding tax procedures and shareholder transparency/ registration.
- The AMI-SeCo welcomes the report published by the EPTF on the barriers to post-trade integration in Europe and the related public consultation carried out by the European Commission.** The AMI-SeCo has supported and will continue to support this work (carried out in the context of creating a Capital Markets Union), offering a T2S harmonisation perspective.³
- With a view to completing the T2S migration the AMI-SeCo will reflect on the future organisation of its harmonisation activities and the related monitoring framework.** In this process the AMI-SeCo wishes to build on the achievements of T2S harmonisation and draw on the relevant work on post-trade integration carried out in the context of the CMU agenda as well as the results of its own related activities (in particular in the fields of collateral management harmonisation and market innovation).

³ November 2017 the AMI-SeCo replied to the public consultation launched by the European Commission relating to the EPTF report. This AMI-SeCo reply is available [here](#).

1 Introduction

T2S and post-trade harmonisation

TARGET2-Securities (T2S) is a pan-European platform for securities settlement, developed and operated by the Eurosystem. By September 2017, 22 central securities depositories (CSDs), covering 20 European markets⁴ had joined the platform, and now settle euro securities transactions in T2S. The Danish kroner will also be available as a settlement currency in T2S from October 2018.

T2S contributes significantly to the integration of financial markets in Europe by harmonising post-trade processes across all participating markets. The extent to which the potential benefits of T2S will materialise depends largely on all relevant stakeholders adapting to and using T2S in a harmonised manner. For this reason, both the Eurosystem and the Advisory Group on Market Infrastructures for Securities and Collateral (AMI-SeCo, which also represents the T2S Community⁵) consider post-trade harmonisation to be a central objective of T2S.

T2S harmonisation activities

Over the last few years a considerable amount of work has been dedicated to creating a single rulebook for post-trade processes across T2S markets. The AMI-SeCo (T2S AG⁶) has identified a total of 24 harmonisation activities that require further action for full harmonisation to be achieved.

The T2S harmonisation activities break down into priority 1 and priority 2 types.

Priority 1 activities are needed to ensure efficient and safe cross-CSD settlement in T2S. The T2S Community should view these activities as a top priority for resolution and implementation before the markets' migration to T2S.

The AMI-SeCo identified 16 priority 1 activities:

1. T2S ISO 20022 messages;
2. T2S mandatory matching fields;
3. interaction with T2S (registration procedures);
4. interaction with T2S (tax info requirements);

⁴ The new Slovakian CSD (NCDP) that joined T2S at the end of October 2017 has been assessed by the ECB Team. The compliance assessment of this CSD is not included in the overall compliance statistics (for comparison purposes) but is shown separately (see Table 6 and Annex 4 for more details).

⁵ The T2S Community of stakeholders comprises national central banks, CSDs and CSD participants.

⁶ The T2S AG is the predecessor of the AMI-SeCo.

5. T2S schedule for the settlement day and calendar;
6. T2S corporate actions standards;
7. Settlement Finality I;
8. Settlement Finality II;
9. Settlement Finality III;
10. IT outsourcing (settlement services);
11. settlement discipline regime;
12. settlement cycles;
13. availability of omnibus accounts;
14. restrictions on omnibus accounts;
15. securities account numbers;
16. dedicated cash account numbers.

Priority 2 activities are not essential to ensuring safe and efficient cross-CSD settlement in T2S, although they are key to the enhancement of the competitive environment and the efficiency of T2S. The T2S Community could continue to pursue these after the markets have completed their migration to T2S.

The AMI-SeCo identified the following priority 2 harmonisation activities:

17. location of securities accounts/conflict of laws;
18. corporate actions market standards;
19. place of issuance;
20. withholding tax procedures;
21. cross-border shareholder transparency and registration procedures;
22. market access and interoperability;
23. securities amount data;
24. portfolio transfers.

Structure of the report

The eighth T2S harmonisation progress report is structured as follows:

- Section 2 provides an overview of the progress made in respect of harmonisation activities, compared with the compliance status presented in the 2017 mid-year update (published on 15 September 2017);
- Section 3 provides updated information on priority 1 harmonisation activities, including, where relevant, the compliance status of each T2S market;
- Section 4 provides updated information on priority 2 harmonisation activities, including, where relevant, the compliance status of each T2S market;
- Annex 1 describes the methodology agreed by the AMI-SeCo for compiling the T2S harmonisation list, including the four-colour status assignment scheme;
- Annex 2 features a table summarising compliance status in all T2S markets (the T2S harmonisation “scoreboard”);
- Annex 3 features the AMI-SeCo impact analysis of those T2S markets assessed as non-compliant with the T2S standards (red statuses) – the AMI-SeCo presents this analysis to the Market Infrastructure Board to decide on any further action;
- Annex 4 reports the detailed results of the monitoring exercise for each T2S market;
- Annex 5 provides background information on the AMI-SeCo, the body publishing this report, including a list of members.

How to read the report

As a first step, readers are advised to familiarise themselves with the T2S harmonisation methodology used to compile the report and the tables, including the criteria used to assess the compliance status of T2S markets – all this reference information may be found in Annex 1.

Readers should then turn to the description of each of the 24 activities. A snapshot of the “traffic light” status of each activity in terms of definition, monitoring and compliance, and in terms of compliance per market, is included in the respective section.

For an overview of the status of all T2S markets see Annex 2 (the table showing compliance per market).

For background information regarding the compliance status of each T2S market see Annex 4. This annex contains a high-level summary of the information provided by each T2S market during the relevant surveys and monitoring processes.

2 Overview

Eighth report results

This is the eighth T2S harmonisation progress report published by the AMI-SeCo. Its main objective is to provide T2S stakeholders and other interested parties with an update on developments in respect of T2S harmonisation activities, i.e. the post-trade harmonisation initiatives relevant for T2S. The report focuses on the progress made between the fourth and final T2S migration waves, and covers the period between March 2017 and December 2017.

Table 1 shows the status of all T2S activities with regard to (i) whether a standard or rule has been defined, (ii) whether a monitoring process has been launched and (iii) the aggregate compliance status of all T2S markets, as observed at the date of publication.

Table 1

Status dashboard of the T2S harmonisation activities (as at 20/12/2017)

Activities – priority 1		Definition	Monitor	Compliance (# of non-compliant markets)	
1	T2S messages	T2S ISO 20022 messages	G	G	B
2		T2S matching fields	G	G	R (3)
3		Interaction for registration	G	G	B
4		Interaction for tax info	G	G	B
5	Schedule of settlement day		G	G	Blank
6	T2S corporate actions standards		G	G	R (9)
7	Legal harmonisation	Settlement finality I (moment of entry)	G	G	B
8		Settlement finality II (irrevocability of transfer order)	G	G	B
9		Settlement finality III (irrevocability of transfers)	G	G	B
10		Outsourcing of IT services	G	G	B
11	Settlement discipline regime		Y	X	X
12	Settlement cycles		G	G	B
13	CDS account structures	Availability of omnibus accounts	G	G	B
14		Restriction of omnibus accounts	G	G	R (1)
15	T2S account numbering	Securities accounts numbering	G	G	B
16		Dedicated cash accounts numbering	G	G	B
Activities – priority 2		Definition	Monitor	Compliance	
17	Legal harmonisation	Location of securities account/conflict of laws	Y	X	X
18	Corporate actions market standards	CA market (CAJWG) standards	G	G	G ⁷
19	Place of issuance		G	X	X
20	Tax procedures	Withholding tax procedures	R	X	X
21	Shareholder transparency/registration		R	X	X
22	Market access		G	X	X
23	Securities amount data		G	G	R (1)
24	Portfolio transfer		Y	X	X

Table 1 summarises progress made since the publication of the 2017 mid-year update report (15 September 2017).⁸ Details are provided below.

⁷ The AMI-SeCo has agreed, as an exception to this rule, to maintain the green and yellow statuses for the priority 2 activity on “corporate actions market standards”. This is justified by the fact that the AMI-SeCo substructures do not monitor the T2S markets directly for this standard, but instead follow a specific statistical compliance methodology based on the monitoring results it receives from the E-MIG.

⁸ [2017 mid-year update report](#)

Definition process. Overall, 19 T2S harmonisation standards have been defined out of a total of 24 activities/workstreams to date. Note that of the five activities still lacking a defined set of standards/rules, only one is a priority 1 activity,⁹ i.e. the settlement discipline regime. Although the relevant EU authorities implemented several CSDR regulatory technical standards in March 2017, including regulatory technical standards covering the calculation of cash penalties,¹⁰ the standards covering mandatory buy-ins are still pending.

The AMI-SeCo continues to assign a red definition status to two priority 2 activities – shareholder transparency/registration and withholding tax procedures. This is because further work is required in the areas of (i) securities registration and shareholder transparency and (ii) withholding tax procedures. The work currently under way as part of the European Commission’s CMU action plan may provide momentum for follow-up action in these areas by both public authorities and private actors.¹¹ The definition status of the priority 2 activity regarding the location of securities accounts/conflict of laws is still assessed as yellow following the European Commission’s initiatives in the field of conflict of laws for securities. In addition, the definition status of the priority 2 activities regarding market access and place of issuance are assessed as green, following the adoption by the relevant EU authorities of regulatory technical standards for CSD requirements in March 2017.¹²

Monitoring process. All 20 T2S markets (22 CSDs) are now fully monitored to assess their compliance with the harmonisation standards. There are well-established and agreed monitoring frameworks, deadlines and responsible actors for further action in each market. After comparison with the 2017 mid-year update, the number of activities that are monitored remains stable at 17.

Compliance status. With T2S migration complete – according to the methodology (described in detail in Annex 1) – only the blue (i.e. fully-compliant) and red (i.e. not fully compliant) statuses are used to assess the overall compliance of T2S markets with the standards. There are 11 standards for which overall full compliance has been achieved by all T2S markets, while for four standards the aggregate level of compliance is assessed as red, since implementation gaps remain in at least one T2S market. In addition, the aggregate level of compliance with standard 18 for CA market standards has improved from yellow to green due to the higher level of compliance achieved by the T2S community, as the 2017 E-MIG survey reflects. In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar in order to close T2S in Good Friday and Easter Monday. Compliance

⁹ See Section 2: priority 1 activities are necessary to ensure efficient and safe cross-CSD settlement in T2S. The T2S Community should view the resolution and implementation of these activities as the top priority before the markets’ migration to T2S.

¹⁰ [Commission Delegated Regulation \(EU\) 2017/389 of 11 November 2016 supplementing Regulation \(EU\) No 909/2014 of the European Parliament and of the Council with regard to the parameters for the calculation of cash penalties for settlement fails and the operations of CSDs in host Member States](#), OJ 10.3.2017, L 65, p. 1.

¹¹ See COM(2016) 601 [Communication from the Commission on the CMU](#), 14 September 2016.

¹² [Commission Delegated Regulation \(EU\) 2017/392 of 11 November 2016 supplementing Regulation \(EU\) No 909/2014 of the European Parliament and of the Council with regard to regulatory technical standards for authorisation, supervisory and operational requirements for central securities depositories](#), OJ 10.3.2017, L 65, p. 48.

by T2S markets with the new T2S calendar standard is to be reassessed after implementation of the new T2S calendar.

Overall, this represents an improvement in compliance with the standards as several T2S markets have even improved compliance for standards which are assessed overall as red (due to a lack of full compliance by all markets). The key area of pronounced non-compliance is on the priority 1 standard relating to T2S corporate actions.

Further progress is needed on priority 2 activities

Despite the very good progress made over the last few years in respect of priority 1 activities, significant steps still need to be taken to remove the remaining technical and regulatory barriers reflected by the priority 2 gaps. This is mostly because the elimination of the remaining post-trade harmonisation barriers is dependent on actions that are outside the competency of the T2S stakeholders. For example, the AMI-SeCo can support and contribute to the work currently under way at EU level regarding withholding tax procedures or conflict of laws issues, but it cannot remove them unilaterally. This lies within the competency of the EU and national public authorities.

The actions taken recently by the European Commission^{7F} and EU lawmakers in general (CSDR Level II measures related to place of issuance and market access, consultation on conflict of laws, work on a code of conduct for withholding tax procedures, shareholder rights and registration referred to above) offer good prospects for tackling these remaining “macro” harmonisation gaps. The AMI-SeCo has been supporting the European Commission’s informal groups, which are working on these issues and will continue to do so for the foreseeable future.

Monitoring results per T2S market

Table 2 provides detailed harmonisation compliance results for each T2S market.¹³ Annex 2 gives details for further reference.

¹³ At the time of publication of this report the Finnish market had not yet defined its target date for joining T2S.

Table 2

Compliance status per T2S market (as at 20/12/2017)

T2S markets	Priority 1															Priority 2	
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (regis- tration)	4 Interaction with T2S (tax procedure)	5 Schedule for the settlement day	6 T2S CA standards	7 T2S settlement finality I	8 T2S settlement finality II	9 T2S settlement finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data
AT	B	B	B	B	Blank	R-?	B	B	B	B	B	B	B	B	B	G	B
BE Euroclear	B	B	B	B	Blank	R-Mar 2018	B	B	B	B	B	B	B	B	B	G	B
BE – NBB-SSS	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
CH	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	N/A	G	B
DE	B	B	B	B	Blank	R-?	B	B	B	B	B	B	B	B	B	R-No info	B
DK	B	B	B	B	Blank	R-?	B	B	B	B	B	B	B	B	B	G	B
EE	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
ES	B	R-?	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
FI	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
FR	B	B	B	B	Blank	R-Mar 2018	B	B	B	B	B	B	R-?	B	B	G	R
GR – BOGS	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	B	B
HU	N/A	R-?	B	B	Blank	R-?	B	B	B	B	B	B	B	B	N/A	R	B
IT	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
LT	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
LU – LUX CSD	B	B	B	B	Blank	R-Mar 2018	B	B	B	B	B	B	B	B	B	G	B
LU – VP LUX	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
LV	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
MT	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
NL	B	B	B	B	Blank	R-Mar 2018	B	B	B	B	B	B	B	B	B	G	B
PT	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	R-No info	B
RO	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
SI	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	B	B
SK (CDCP)	B	R-?	B	B	Blank	R-Mar 2018	B	B	B	B	B	B	B	B	B	R-No info	B

Table 2 shows the current compliance statuses for 20¹⁴ national markets; however, where more than one CSD exists in a given T2S market, each CSD “market segment” is monitored separately. For example, in the case of Belgium both NBB-SSS as well as Euroclear Belgium are treated as two different “markets” or two market segments of a single national market. The AMI-SeCo focuses its analysis on T2S markets, rather than specific T2S actors (CSDs etc.), since there is a common understanding that harmonisation compliance is a coordinated effort across the entire national market. This usually involves national market infrastructures, their clients and, where relevant, national authorities (for an example see issues on settlement finality).

With regard to its methodology (see Annex 1) the AMI-SeCo assesses all migrated T2S markets as either blue (full compliance has been achieved) or red (full compliance has not yet been achieved). The green and yellow statuses are only used for markets that have not yet migrated and therefore reflect these markets’ implementation plans.¹⁵ More details on the colour scheme methodology used by the AMI-SeCo are available in Annex 1.

- **85% of the total statuses are now blue, compared with 70% in the last mid-year update.** This is a 15 percentage-point improvement in the level of overall full compliance in T2S. It is largely due to the four markets (EE, ES, LT, LV) which migrated to T2S on 18 September 2017 as part of the final wave, as well as the full compliance achieved by all T2S markets with the standard for settlement finality I. This confirms that when markets migrate to T2S they achieve close to full compliance with the T2S standards. In other words, compliance plans and AMI-SeCo assessments were largely confirmed by the ex post monitoring results. (see Table 3)
- **The number of non-compliance cases (red statuses) is 5%, compared with 7% in the last mid-year update.**¹⁶ New compliance gaps with the CA market standards (2 new non-compliant markets due to the lack of information available for assessment) emerged. Furthermore, in the case of the Spanish market, following its migration non-compliance has been detected with the T2S standard for matching fields. The AMI-SeCo provides regular assessments to the ECB’s Market Infrastructure Board (MIB) of the impact of the compliance gaps with the priority 1 standards on the rest of the T2S Community. As shown in Annex 3, the T2S Community considers this impact to be manageable. Nevertheless, the pronounced non-compliance gaps with the T2S corporate actions standards will require special attention in the near future from the AMI-SeCo and the T2S Community in general (see Table 3).

¹⁴ The Finnish market is not assessed in this report due to the lack of a defined migration timeframe to T2S.

¹⁵ Except in column 18 (corporate actions market standards), where the colour statuses reflect a stock-taking statistical compliance status, i.e. they are based on the percentage of the corporate actions (CAJWG) market standards that have been implemented in each T2S market. The European Market Implementation Group (E-MIG) is responsible for the monitoring process and provides the relevant statistics to the AMI-SeCo.

¹⁶ There are also four statuses marked “N/A” (not applicable) in Table 2. These relate to instances where the local national central bank does not provide liquidity (standard on cash accounts) and to the non-applicability of ISO messages in one market (no A2A connectivity to T2S).

Table 3Summary of compliance statistics for T2S markets (as at 20/12/2017)¹⁷

	2017 Mid-Year Update			8 th HPR		
	Priority 1	Priority 2	% of total	Priority 1	Priority 2	% of total
Blue	253	23	70%	292	23	85%
Green	51	14	17%	0	16	4%
Yellow	0	2	1%	0	0	0%
Red	23	5	7%	13	5	5%
N/A	18	2	5%	18	2	5%
Total	345	46	100% (391)	323	46	100% (369)

¹⁷ The total number of compliance statuses has decreased from 391 to 369 due to the decision on the standard of the T2S calendar by which the compliance status is reflected as blank.

Table 4

Change in compliance statuses from mid-year update (as at 20/12/2017)

T2S markets	Priority 1																Priority 2		
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (regis- tration)	4 Interaction with T2S (tax procedure)	5 Schedule for the settlement day	6 T2S CA standards	7 T2S settlement finality I	8 T2S settlement finality II	9 T2S settlement finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data		
AT					B	Blank	G	B											
BE Euroclear					R	Blank	G	B											
BE – NBB-SSS					R	Blank	G	B											
CH					B	Blank	G	B											
DE					B	Blank	G	B								G	R		
DK					B	Blank	G	B											
EE	G	B	G	B			G	B		G	B				G	B	Y	G	
ES	G	B	G	R	G	B								G	B				
FR					R	Blank	G	B											
GR – BOGS					R	Blank	G	B											
HU					R	Blank	G	B											
IT					R	Blank	G	B								B	G		
LT	G	B	G	B			G	B	G	B	G	B			G	B	R	G	
LU – LUX CSD					B	Blank	G	B											
LU – VP LUX					B	Blank	G	B											
LV	G	B	G	B			G	B	G	B	G	B			G	B		G	B
MT					R	Blank	G	B										R	G
NL					R	Blank	G	B											
PT					R	Blank	G	B										B	R
RO					R	Blank	G	B										Y	G
SI					B	Blank	G	B										R	B
SK					R	Blank	G	B											

Table 4 shows a breakdown of changes in compliance assessments by T2S market and harmonisation standard compared with the 2017 mid-year update. There were 56 status changes¹⁸ between the two publications, consisting of 52 status improvements (mainly from green to blue

¹⁸ The changes to “Blank” of the T2S standard on the T2S calendar are not per se status changes and therefore not part of the statistics of status changes.

due to the completion of the final migration wave to T2S with all T2S markets achieving full compliance with the T2S settlement finality I standard), 4 deteriorations, mainly due to cases of non-compliance with the CA market standards (standard 18).

Table 5

Compliance of the final wave, which migrated on 16/9/2016 (monitoring status: 20/12/2017)

T2S markets	Priority 1															Priority 2	
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (registration)	4 Interaction with T2S (tax procedure)	5 Schedule for the settlement day	6 T2S CA standards	7 T2S settlement finality I	8 T2S settlement finality II	9 T2S settlement finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data
EE	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
ES	B	R-?	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
LT	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
LV	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B

Final wave post-migration results. Table 5 shows that the four markets (EE, ES, LT and LV) that migrated in the final wave on 18 September 2017 achieved a great level of compliance. In the case of the Spanish market non-compliance was detected after migration in relation to standard 2 (matching fields). This compliance gap, along with all other remaining non-compliance cases in other markets, are covered in the AMI-SeCo's impact analysis report (see Annex 3).

Table 6

Compliance of SK (NCDCP), which migrated on 30/10/2017 (monitoring status: 20/12/2017)

T2S markets	Priority 1															Priority 2	
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (registration)	4 Interaction with T2S (tax procedure)	5 Schedule for the settlement day	6 T2S CA standards	7 T2S settlement finality I	8 T2S settlement finality II	9 T2S settlement finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data
SK (NCDCP)	B	R-?	B	B	Blank	R-?	B	B	B	B	B	B	B	B	B	R-No info	B

Assessment of compliance of the new Slovakian CSD (NCDP) that joined T2S in October 2017. The new Slovakian CSD (NCDP) joined T2S in October 2017, after the final migration wave. Table 6 shows the post-migration compliance assessment for this CSD. Overall, NCDP shows full compliance with all T2S standards, with the exception of compliance gaps relating to standard 2 (matching fields), standard 6 (T2S CAs) and standard 18 (CA market standards).

Other key activities by the AMI-SeCo related to T2S harmonisation

Analytical work on financial innovation

On the basis of the change made to its mandate by the AMI-SeCo to include financial innovation, the Harmonisation Steering Group (HSG) established a task force dealing with distributed ledger technology (DLT-TF) in July 2016. This aimed at providing analysis and advice regarding the potential impact of distributed ledger technology on the T2S harmonisation agenda. Based on the work of the task force, the AMI-SeCo published an in-depth report¹⁹ on this topic in September 2017. The AMI-SeCo wishes to continue the analytical work in the field of financial innovation and has established, as a successor of the DLT-TF, a new HSG taskforce (Fintech-TF) with a focus on the potential impact of technological innovation in the field of securities post-trading.²⁰

AMI-SeCo reply to the EPTF consultation

In November 2017 the AMI-SeCo prepared, submitted and published a reply to the public consultation launched by the European Commission, based on the report by the European Post Trade Forum (EPTF).²¹ Overall, the AMI-SeCo supports the conclusions of the EPTF report and stands ready to contribute to the work on removing the identified barriers relating to its mandate.

AMI-SeCo work on collateral management harmonisation

The HSG of the AMI-SeCo established a task force on collateral management harmonisation (CMH-TF) in July 2017. The key objective was to analyse in depth the AMI-SeCo's initial deliberations on collateral management harmonisation with a view to creating a detailed list of required harmonisation and activities in this field. As a next step the CMH-TF will work towards the implementation of such identified activities. The topics to be covered by the CMH-TF in this area include (but are not

¹⁹ See [AMI-SeCo report on the potential impact of DLTs on securities post-trading harmonisation and on the wider EU financial market integration](#).

²⁰ The terms of reference of the Fintech-TF are available [here](#).

²¹ In November 2017 the AMI-SeCo replied to the [public consultation launched by the European Commission](#) related to the [EPTF report](#). This AMI-SeCo reply is available [here](#).

limited to) identifying barriers to the efficient management of collateral; performing a gap analysis of existing market practices and proposing potential AMI-SeCo guidance/best practices; harmonising related ancillary activities; harmonising procedures for triparty collateral management and related message standards; and defining agreed terminology on key concepts in the collateral management domain.

Next steps

To foster progress in the T2S harmonisation agenda, the AMI-SeCo is planning to undertake the following actions during 2018.

- The AMI-SeCo will focus and follow up on areas of non-compliance in T2S markets, particularly in respect of the area where more pronounced non-compliance is still observed (T2S corporate actions standards).
- The AMI-SeCo will continue to assess the impact of cases of individual non-compliance on the rest of the T2S Community. The AMI-SeCo will offer its advice to the MIB accordingly.
- Following the entry into force of the CSDR level 2 standards, the AMI-SeCo will assess whether the T2S Community needs to take any further action with regard to the affected T2S harmonisation activities (i.e. settlement discipline regime, market access and freedom of issuance).
- The AMI-SeCo will seek to foster progress in the priority 2 activities, in cooperation with market stakeholders and public authorities. In this context, the AMI-SeCo awaits the next steps envisaged by the European Commission on the basis of its public consultation with regard to the EPTF report. The AMI-SeCo stands ready to continue to support this work and the European Commission's CMU action plan more generally.
- The AMI-SeCo will reflect on the future framework of its T2S harmonisation monitoring with a view to entering a new, post-migration era of T2S and related harmonisation activities.

3 T2S harmonisation activities – priority 1

Priority 1 activities are needed to ensure efficient and safe cross-CSD settlement in T2S. The HSG and the ECB team should view these activities as a top priority for resolution before the T2S launch and implementation before the markets' migration to T2S.

T2S messages

The following four sections cover all the activities aimed at harmonising the use of settlement messages across T2S markets. This includes, in addition to the use of a common list of messages and matching fields, the AMI-SeCo agreements regarding the use of T2S messages for non-settlement information (relating specifically to registration and tax procedures).

3.1 T2S ISO 20022 messages

Activity description

The objective of this activity is to monitor the development and implementation of the T2S ISO 20022 messages.

T2S ISO messages are part of the technical specifications/requirements for T2S actors' interaction with T2S services. T2S actors that do not comply with T2S ISO messages will not be able to connect to and communicate with the T2S technical platform in application-to-application (A2A) mode (including during testing).

T2S markets must achieve compliance before migration to T2S if they wish to connect with T2S in A2A mode.

Activity status

Priority 1 – activity no 1	Definition	Monitoring	Compliance
T2S ISO 20022 messages	G	G	B

T2S STANDARD

T2S actors will communicate with the T2S technical platform using a set of ISO 20022 compliant messages (130 messages in total), customised to the specific needs of T2S.²²

Some of these messages have already been ISO 20022 registered, while the remainder will be registered after the T2S migration period. The AMI-SeCo (via the T2S Sub-group on Message Standardisation²³) and the 4CB²⁴ were the main actors charged with defining the process for this activity.

Compliance status of T2S markets

18 All T2S markets connecting to T2S in A2A mode²⁵ are already operating in full compliance with this standard (i.e. a blue status has been assigned by the AMI-SeCo).

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, ES, FR, GR (BOGS), IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK (CDCP)
Green	None
Yellow	None
Red	None

Information input: NSGs.

For details of the compliance status and colour methodology, see Annex 1. For detailed explanations per T2S market, see Annex 4.

Monitoring

Implementation date	Migration to T2S (depending on migration wave) for A2A connectivity.
Monitoring actors	ECB team, NSGs.
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective NSGs.

²² The full catalogue may be viewed in Section 3 of the [T2S User Detailed Functional Specifications \(UDFS\)](#) as published on the ECB/T2S webpages.

²³ For more information on the T2S [Sub-group on Message Standardisation](#), see the relevant page of the T2S website.

²⁴ The 4CB is made up of the four national central banks of Germany, France, Italy and Spain that were mandated by the Governing Council of the ECB to develop and operate T2S.

²⁵ Monitoring is only relevant for T2S markets connecting to the T2S platform in A2A mode by their migration to T2S. Compliance of the T2S markets connected to the T2S platform only in user-to-application (U2A – via T2S GUI) mode by their migration to T2S will be assessed once A2A mode connectivity has been made available.

3.2 T2S matching fields

Activity description

The objective of this activity is to ensure that all T2S markets use the T2S matching fields²⁶ in a standardised way for settlement in T2S. Non-compliance with this standard could negatively affect matching rates in T2S, thus leading to inefficiencies and possible cost increases for other CSDs in the T2S Community.

In addition, the existence of a single and exhaustive list of matching fields allows T2S actors (e.g. investor CSDs and intermediaries) to access all T2S markets without any need to manage divergent and mandatory specificities in the settlement transaction flow. This ensures a level playing field and does not depend on the location of matching services within the T2S markets.

T2S markets must achieve compliance before their migration to T2S.

Activity status

Priority 1 – activity no 2	Definition	Monitoring	Compliance
T2S matching fields	G	G	R(3)

T2S STANDARD

T2S actors are required to use as matching fields only the ones described in the relevant T2S system specification documents.²⁷

The single list of T2S matching fields is applicable to all matching activities (CSD matching services taking place both in and outside T2S) that lead to settlement in T2S (settlement in T2S securities and/or cash accounts).

This standard does not exclude CSDs and their participants from using additional information/fields in their settlement instructions where applicable. The information may be required by CSDs providing certain ancillary services to their participants (e.g. repo and collateral services).²⁸ In any case, any such market practice in respect

²⁶ See T2S UDFS (Section 1.6.1.2.3).

²⁷ See T2S UDFS (Section 1.6.1.2).

²⁸ For example, a T2S best market practice for populating the optional matching field "Client of the CSD participant" was approved by the T2S AG (the AMI-SeCo's predecessor) in February 2016. T2S markets are encouraged to adopt this practice, with the aim of improving cross-border matching efficiency in T2S via a standardised use of optional matching fields.

of additional information fields should be compliant with all relevant T2S harmonisation standards.

Compliance status of T2S markets

Most T2S markets have achieved full compliance (blue status) in accordance with their implementation plans. The Slovakian market (CDCP and NCDP) continues to use matching fields that are not part of the T2S standard. The Spanish market misuses the T2S matching field “Client of the CSD participant” in order to handle end-investor information for intra-CSD transactions on equities. The Hungarian market will temporarily retain its current matching practices after its migration to T2S, although an implementation plan to achieve full compliance is currently under discussion.

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, FR, GR (BOGS), IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI
Green	None
Yellow	None
Red	ES, HU, SK (CDCP)

Information input: NSGs and bilateral input.

For details of the compliance status colour methodology, see Annex 1. For detailed explanations per T2S market, see Annex 4.

Monitoring

Implementation date	Migration to T2S (depending on migration wave).
Monitoring actors	ECB team, NSGs.
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective NSGs. Monitoring is a continuous process that takes place before and after each T2S market migrates to T2S.

3.3 Interaction with T2S (registration procedures)

Activity description

The objective of this activity is to establish a T2S standard covering the exchange of registration-related information in T2S.

The aim of adopting a homogeneous practice across all T2S markets is to ensure that registration procedures neither interrupt straight-through processing nor hamper

smooth cross-CSD settlement in T2S. Including registration information in T2S settlement instructions could reduce settlement efficiency in T2S by causing T2S instructing actors to put instructions on hold.²⁹ Non-compliance would impose back-office costs on instructing counterparties and would discourage cross-CSD activity in T2S.

The target date for T2S markets to fully comply with this standard is their migration date to T2S (depending on their migration wave).

Activity status

Priority 1 – activity no 3	Definition	Monitoring	Compliance
Interaction with T2S (registration procedures)	G	G	B

T2S STANDARD

Registration details should not be exchanged via T2S messages.

The standard is based on the TFX analysis, which showed that using T2S messages to transmit registration data could affect cross-CSD settlement efficiency and increase complexity in T2S. In addition, based on the current T2S design, this solution would not be feasible in all settlement scenarios.

Further registration-related aspects that could have an impact on cross-CSD settlement are analysed under the relevant priority 2 harmonisation activity elsewhere in this report (see Section 4.5).

Compliance status of T2S markets

All T2S markets are already compliant with the standard.

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, ES, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK (CDCP)
Green	None
Yellow	None
Red	None

²⁹ This matter was thoroughly analysed by the Task Force on Adaptation to Cross-CSD settlement in T2S (TFAX), an AMI-SeCo substructure, in its final report (November 2012). Registration and settlement are closely related processes, and it is crucial to adapt these processes in order to achieve alignment of settlement and registration data. In practice, it is important to ensure that the register is only updated after settlement has been confirmed. The [TFAX report](#) is available on the T2S website.

Monitoring

Implementation date	Migration to T2S (depending on migration wave). CSDs are participating in their respective T2S testing activities using the T2S ISO messages.
Monitoring actors	ECB team, NSGs.
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective NSGs.

3.4 Interaction with T2S (tax info requirements)

Activity description

The objective of this activity is to establish a T2S standard for the management of transaction-related tax information across borders, in order to avoid inefficiencies generated by heterogeneous local tax requirements (transaction-related tax rules and tax information flow).

Non-compliance would impose back-office costs on instructing counterparties and might discourage cross-CSD activity in T2S.

The target date for T2S markets to fully comply with this standard is their migration date to T2S (depending on their migration wave).

Activity status

Priority 1 – activity no 4	Definition	Monitoring	Compliance
Interaction with T2S (tax info requirements)	G	G	B

T2S STANDARD

Tax-related information for domestic and cross-CSD transactions is not passed via T2S messages.

Note: Tax-related information includes, but is not limited to, the tax status of the transaction, tax status or tax ID of the end investor, tax exemption identification number, alien registration number, passport number, corporate identification number, driving license number, foreign investment identity number, BIC, proprietary ID and name and address of the investor. ISO messages provide fields that can be used to pass information about a particular transaction tax type (withholding tax, payment levy tax, local tax, stock exchange tax, transfer tax, value-added tax, consumption tax), as well as the amount, debit/credit indicator, currency and other details. To fully comply with this

standard, T2S markets/CSDs should not use these fields to pass on any kind of tax-related information.

The TFAX analysed the possibility of interaction with T2S in respect of domestic tax requirements and concluded that there is no technical or process-based solution that would achieve efficient tax information processing in the T2S environment.

Compliance status of T2S markets

All T2S markets are currently fully compliant with the standard, i.e. no tax information is transmitted via T2S messages.

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK (CDCP)
Green	None
Yellow	None
Red	None

Monitoring

Implementation date	Migration to T2S (depending on migration wave).
Monitoring actors	ECB team, NSGs.
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective NSGs. As all T2S markets are already compliant with the standard no further monitoring of the activity is required.

3.5 T2S schedule for the settlement day and calendar

Activity description

The use of a single schedule for the T2S settlement day and a single calendar for each currency is established by the T2S User Requirements Document (URD) and is one of the first and key harmonisation agreements in the context of T2S.³⁰ The AMI-SeCo (former AG) has agreed, since the first stages of the T2S project, that full

³⁰ The [URD](#) is available in the key documents section of the T2S website.

compliance of T2S markets with the T2S schedule and calendar is a prerequisite for achieving an efficient cross-CSD environment in T2S.

This activity has two main aims. First, its implementation should provide assurances over the removal of Giovannini barrier 7 on operating hours, settlement deadlines and opening days³¹ in T2S markets. Second, CSDs and their clients should be able to define, within the single T2S schedule, their preferred operational model, according to their business needs and service level agreements.

The AMI-SeCo noted that proposals for the implementation of technical standards by the CSDR, published by the European Securities and Markets Authority (ESMA) on 28 September 2015, include the legal requirement that linked CSDs (in an interoperable link arrangement) “shall agree on equivalent standards concerning reconciliation, opening hours for the processing of the settlement and of the corporate actions and cut-off times”.³²

The target date for each T2S market to achieve full compliance with the T2S standard is its migration date to T2S.

Activity status

Priority 1 – activity no 5	Definition	Monitoring	Compliance
T2S schedule for the settlement day and calendar	G	G	Blank

T2S STANDARD

T2S markets should be fully compliant with the T2S schedule for the settlement day and calendar, available on the T2S website.

In order to ensure consistency when monitoring implementation across T2S markets, it should be clarified that the status of “full compliance” with the T2S schedule and calendar is achieved if the following conditions are met by the T2S market/CSD in question.

The T2S market/CSD operational model should ensure that:

1. the CSDs’ securities accounts in T2S are available for bookings (credits, debits, realignment, etc.) until the FOP cut-off and the NCBs’ dedicated cash accounts in T2S are available for bookings until the last cash sweep of the relevant currency;
2. settlement efficiency in T2S is not affected – for example, the T2S market/CSD will participate in the start-of-day processes and in the timely processing of corporate actions in a systematic manner;

³¹ For further information, see [second_giovannini_report](#)

³² See 3.12 [Article CSD Links](#) (Article 48).

3. all other T2S daytime (operating hours) and cut-off times are respected (delivery-versus-payment (DvP) cut-off, etc.);
 4. CSDs provide directly connected parties (DCPs) with authorisation for connecting to T2S (where required and subject to the relevant T2S technical requirements).
-

If CSD legacy systems shut down during T2S operating hours, CSD participants (investor CSDs, DCPs and indirectly connected parties (ICPs)) may not receive the same level of service. In particular, the timing in respect of sending settlement instructions to and receiving reports from T2S-relevant settlement processes will depend on the CSD participants' model for connectivity with T2S (DCP, user to application, etc.). This relates to business models and service level agreements between CSDs and their participants. The policy should not affect the compliance status of a T2S market, provided the above four conditions are met.

The T2S schedule is specified in the scope-defining set of documents. The exact times in the T2S settlement day schedule could be subject to revision, in line with changes in the T2S community's business needs.

Compliance status of T2S markets

In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.

Monitoring

Implementation date	Migration to T2S (depending on migration wave). CSDs are participating in T2S testing activities in line with the T2S schedule for the settlement day.
Monitoring actors	HSG (via NSGs).
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective NSGs. Monitoring is a continuous process that takes places before and after each T2S market migrates to T2S.

3.6 T2S corporate actions standards

Activity description

Differences in national rules relating to the processing of corporate actions have been identified by the industry as one of the most critical barriers to an integrated EU post-trade environment. As identified by the Giovannini Report (barrier 3), these differences cover a broad range of topics, with an impact beyond core settlement problems (e.g. variation in rules, information requirements and deadlines for corporate actions). These differences may require specialised local knowledge or the local storage of physical documents, thus inhibiting the centralisation of securities settlement.

The AMI-SeCo endorsed the T2S corporate actions standards in July 2009 and updated them in May 2013.³³ Non-compliance with these standards by T2S markets will hamper the efficient management of corporate actions on flows, especially in the context of cross-CSD settlement. The standards are based on the high-level corporate actions market standards defined by the European Commission-sponsored CAJWG (see activity no 18, described in Section 4.2). More specifically, the T2S corporate actions standards provide the details necessary for T2S markets to implement the market standards for corporate actions on flows in T2S in a harmonised manner.

Full compliance with the T2S corporate actions standards must be achieved before a market migrates to T2S. T2S markets must also be able to participate in bilateral interoperability testing, multilateral testing and community testing, in line with the T2S corporate actions standards.

Activity status

Priority 1 – activity no 6	Definition	Monitoring	Compliance
T2S corporate actions standards	G	G	R(9)

T2S STANDARD

T2S markets should comply with the T2S corporate actions standards, as endorsed by the AMI-SeCo and published on the T2S website, related to corporate actions on flows (i.e. market claims, transformations and buyer protection).

³³ The full list of T2S corporate actions standards is available on the [T2S website](#).

In addition to the standards, the T2S Corporate Actions Sub-group (CASG) has published a detailed frequently asked questions (FAQ)³⁴ document listing the most relevant questions related to the implementation of the T2S corporate actions standards. The FAQ is a “living” document that is frequently updated as the T2S CASG addresses new questions raised by the T2S markets.

Compliance status of T2S markets

As a part of the latest CASG gap analysis, and in line with the published AMI-SeCo methodology, the CASG has assigned a compliance status to each market (blue or red – see Annex 1 for definitions). This was based on the T2S markets’ current compliance with the T2S standards and existing detailed plans and dates for full implementation prior to migration to T2S. Regulatory and legal barriers in national markets were also taken into consideration by the CASG.

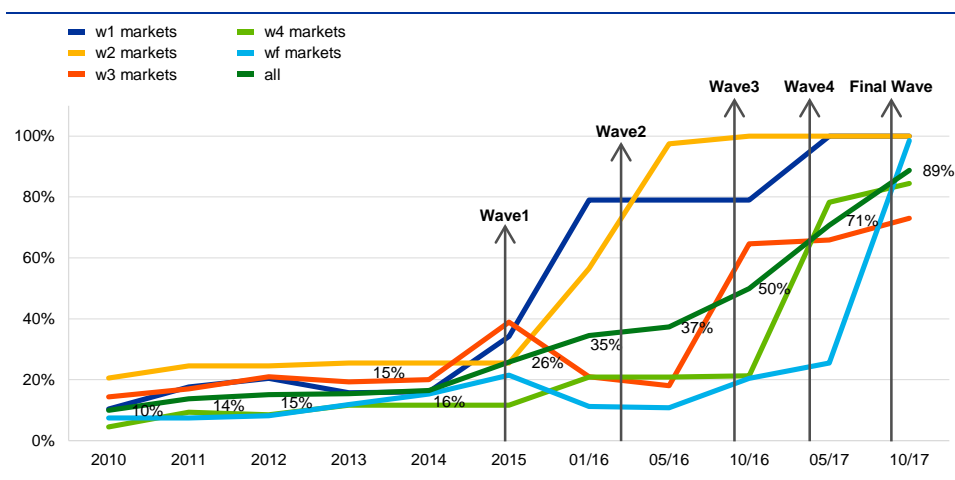
Following the completion of migration to T2S thirteen markets (BE (NBB-SSS), CH, ES, EE, GR (BOGS), IT, LT, LU (VP LUX), LV, MT, PT, RO, SI) are assigned blue status (full compliance). Nine other markets maintain, or were downgraded to, red. These are covered in the AMI-SeCo’s impact analysis, which is then submitted to the MIB (see Annex 3). Despite some compliance gaps, the majority of T2S markets (in particular, those of the final migration wave) have made considerable progress in adapting to the T2S corporate actions standards³⁵. Compared with the previous CASG gap analysis, the overall rate of current compliance with T2S CA standards has increased from 71% to 89% (see Figure 1).

³⁴ The latest update of the FAQ document was published in October 2017 and is available on the [T2S CASG webpage](#).

³⁵ Based on the results of a fact-finding survey conducted by the CASG in 2016, some markets are non-compliant with two underlying CAJWG standards and, as a result, are non-compliant with CASG transformation standard 3. The issue relates to the non-generation of transformations in the event of a mandatory reorganisation with default option “lapse”, and in the event of an unsettled transaction for which there is no buyer protection. Following guidance from the Harmonisation Steering Group (HSG), the CASG has not taken this information into account in the end-2017 gap analysis report. This decision was based on three considerations: (i) the coverage and methodology for the fact-finding survey were different from, and in some aspects not consistent with, the coverage and methodology for the gap analysis questionnaire; (ii) the underlying problem relates to compliance with the CAJWG standards, which explains why the most recent CASG gap analysis survey did not cover this issue in detail; and (iii) the CASG has re-confirmed the appropriate interpretation of both the CASG and the CAJWG standards in respect of this issue in the CASG FAQ document that was approved by the HSG at its meeting on 26 and 27 October 2017. The CASG will review, in detail, compliance with these standards in its next gap analysis review in Q2 2018.

Figure 1

Statistical compliance of T2S markets with the T2S corporate actions standards



Source: CASG gap analysis reports.

Blue	BE (NBB-SSS), CH, EE, ES, GR (BOGS), IT, LT, LU (VP LUX), LV, MT, PT, RO, SI
Green	None
Yellow	None
Red	AT, BE (Euroclear), DE, DK, FR, HU, LU (LUX CSD), NL, SK

Information input: CASG gap analysis (status end-2017) and additional input from NSGs and CASG.

For details on the compliance status colour methodology, see Annex 1. For detailed explanations per T2S market, see Annex 4.

Monitoring

Implementation date	From a legal/regulatory/market practice perspective: migration to T2S (depending on migration wave). From a technical perspective: start of bilateral interoperability testing (depending on migration wave).
Monitoring actors	HSG (via CASG and NSGs).
Monitoring process	The CASG's gap analysis reports are the main monitoring tool for this harmonisation activity. The NSGs assist the ECB team in monitoring compliance and coordinating overall interaction with the relevant national markets.

Legal harmonisation

Activities 7 to 10 cover issues of legal harmonisation across T2S markets. Together with the priority 2 activity relating to conflict of laws issues (covered in Section 4.1), they are expected to enhance legal certainty and strengthen the legal framework for cross-CSD operations in T2S.

The three activities relating to settlement finality seek to ensure that all participating T2S “systems” have a harmonised definition of the moment of entry of transfer orders into the system (SF I), the moment of irrevocability of transfer orders (SF II), and the moment when settlement (i.e. entries in accounts) becomes irrevocable and enforceable (SF III). This is crucial for ensuring legally sound and seamless settlement at cross-CSD level.

The other priority 1 legal harmonisation activity refers to the authorisation of CSDs to outsource their settlement-related IT to a public entity (see Section 3.10).

The four activities presented below are clearly connected to already existing or ongoing international and EU legal harmonisation agreements/initiatives, e.g. the Settlement Finality Directive, the ESCB-CESR recommendations, the CPSS-IOSCO principles and the CSDR.

The priority 2 activity on legal certainty is clearly linked to the European Commission’s communication regarding the CMU action plan and the legislative initiative on the conflict of laws issues.

3.7 Settlement Finality I

Activity description

SF I may be defined as the moment of entry of a transfer order into the system. It contributes to identifying the moment at which a transfer order is protected against insolvency procedures. SF I is defined in and covered by:

- the Settlement Finality Directive 98/26/EC, Article 3;
- ESCB-CESR (2009) recommendations for securities settlement systems (no 1);
- CPSS-IOSCO (2012) principles for financial market infrastructures (no 1 and no 8);
- Regulation (EU) No 909/2014 (CSDR), 23 July 2014, Article 39(2) and Article 48(8).

The aim of this T2S harmonisation activity is to agree on a common T2S rule regarding the moment of entry of a transfer order into the system (SF I) and to ensure that all T2S markets comply. The Framework Agreement (Article 21(4)) and the CSDR (Article 48(8)) recognise the need for a harmonised CSD rule for the moment of entry of a transfer order into the system (for interoperable systems).

SF I is currently defined in the rules of all designated securities settlement systems and the payments systems of the national central banks (as is required by the Settlement Finality Directive). At domestic level, all T2S markets are compliant with SF I (in accordance with the Settlement Finality Directive). However, important

divergences have been noted in the past between these national rules across the T2S CSDs.³⁶

In order to minimise legal risks in cross-CSD transactions, as well as to create a level playing field, a single definition of the moment of entry of a transfer order into the system must be agreed upon and implemented by all T2S markets/CSDs. A harmonised rule will protect against spillover effects arising from the insolvency of a participant in another CSD (linked CSD in T2S).

Activity status

Priority 1 – activity no 7	Definition	Monitoring	Compliance
Settlement finality I (moment of entry)	G	G	B

T2S STANDARD

CSDs to define SF I in their systems as the moment of validation of a transfer order.

The CSDs using the T2S platform have agreed on a harmonised moment of entry of securities transfer orders into their respective systems: this corresponds to the moment of validation of the transfer order. This validation can take place either on the T2S platform or on the CSD legacy systems (for those CSDs offering domestic matching services). The standard implements the resolution passed by the T2S CSD Steering Group (CSG) in December 2013.

The Eurosystem national central banks define SF I in their systems (i.e. TARGET 2) as currently prescribed in the TARGET2 Guidelines (i.e. SF I = SF II = SF III). The CSDs and the central banks in T2S have signed a collective agreement which introduces a single SF I rule for all systems (both CSD systems and central bank systems). This requires all systems to define SF I, in their rules, as the moment of validation of a transfer order.

Furthermore, the T2S Community has on its radar the insolvency rules that deal with the treatment of instructions after a CSD participant's default, or after declaration of SF I. At EU level, ESMA adopted the guidelines on participant default rules and procedures in June 2017.³⁷ These guidelines set out, inter alia, the procedure for acknowledging a participant's default, and determine the actions a CSD may take in

³⁶ An ECSDA survey dated 24 October 2011 on settlement finality found that out of the 18 CSDs that participated in the survey, six CSDs consider the "point of entry" to be the moment at which the instruction (transfer order) is first received by the CSD, while 12 CSDs consider the "point of entry" to involve not only the receipt of an instruction, but also some form of validation (which varied among the CSDs).

³⁷ [ESMA Guidelines on "CSD participants default rules and procedures"](#).

the event of such a default. The actions include changes to normal settlement practices, such as blocking the entry of additional settlement instructions by the defaulting participant, suspending the participant's non-final settlement instructions from settlement, or restricting certain functionalities that can be applied to the settlement instructions of that participant (e.g. setting an end date for the recycling of a settlement instruction). At T2S Community level, the CSG has set out standards intended to enhance functionality related to preventing acceptance (i.e. reaching SF1) of new settlement instructions based on the T2S dedicated cash account or securities account, or simplify functionality related to the retrieval of SF1/SF2 timestamps. In addition, the T2S Community has agreed on tools and procedures that should be used to handle a CSD participant's insolvency.

Compliance status of T2S markets

All T2S markets are currently fully compliant with the standard.

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK (CDPC)
Green	None
Yellow	None
Red	None

Monitoring

Implementation date	As soon as possible after the signing of the collective agreement on SF I.
Monitoring actors	HSG (NSGs).
Monitoring process	Survey of NSGs and CSDs carried out by the HSG.

3.8 Settlement Finality II

Activity description

Settlement Finality II (SF II) is defined as the irrevocability of a transfer order (and not of the transfer of the securities itself) according to the rules of a system designated under the Settlement Finality Directive. SF II is defined in and covered by:

- Settlement Finality Directive 98/26/EC, Article 5(1 and 2);

- ESCB-CESR (2009) recommendations for securities settlement systems (no 1 and 8);
- CPSS-IOSCO (2012) principles for financial market infrastructures (no 1 and 8);
- Regulation (EU) No 909/2014 (CSDR), 23 July 2014, Article 7(3), Article 39(2) and Article 48(8).

The aim of this activity is to adopt a harmonised rule for the moment of irrevocability of transfer orders, in order to eliminate the risk of transfer order revocation in a T2S cross-border environment.

The target date for T2S markets to comply with the agreed rule is their migration to T2S (depending on their migration wave).

Activity status

Priority 1 – activity no 8	Definition	Monitoring	Compliance
Settlement finality II (irrevocability of transfer orders)	G	G	B

T2S STANDARD

No unilateral cancellation is possible after matching status is achieved in T2S.

The irrevocability of transfer orders in T2S is protected by the rule prohibiting the unilateral cancellation of instructions after matched status has been achieved in T2S (see the T2S URD³⁸).

CSDs should comply with the rule covering the irrevocability of transfer orders as laid down in the T2S URD (i.e. no unilateral cancellation in T2S) by default, since there is no T2S functionality for unilateral cancellation after matched status has been achieved in T2S. However, it is necessary to monitor to ensure that the CSDs' regulatory environments, including their rules and procedures, have been updated accordingly.

This also complies with Article 21(4) of the T2S Framework Agreement, according to which contracting CSDs must make all arrangements necessary to adopt a harmonised definition of the irrevocability of transfer orders.

³⁸ Available at: [T2S URD](#)

Compliance status of T2S markets

All T2S markets that have migrated to T2S are compliant with the standard (blue status).

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, ES, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK (CDPC)
Green	None
Yellow	None
Red	None

Information input: NSG survey, bilateral discussions and information from NSG chairpersons.

For details on the compliance status colour methodology, see Annex 1. For detailed explanations per T2S market, see Annex 4.

Monitoring

Implementation date	T2S migration date (depending on migration wave).
Monitoring actors	HSG (NSGs).
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective NSGs.

3.9 Settlement Finality III

Activity description

SF III is defined as the irrevocability of transfers (bookings in CSD accounts) according to the rules of a system designated under the Settlement Finality Directive. Although no rule for SF III is set out in the Settlement Finality Directive, it is defined in and covered by:

- ESCB-CESR (2009) recommendations for securities settlement systems (no 1 and 8);
- CPSS-IOSCO (2012) principles for financial market infrastructures (no 1 and 8);
- Regulation (EU) No 909/2014 (CSDR), 23 July 2014, Article 39(3) and Article 48(8).

This activity aims at ensuring that all T2S markets comply with the common rule on the unconditionality and irrevocability of account entries (debits and credits) in T2S.

Full compliance by all T2S markets with the common SF III rule is of the utmost importance, since any non-compliance would undermine the legal certainty of bookings in T2S accounts. It would also represent a breach of the obligations stipulated in the T2S Framework Agreement.

This is also in line with Article 21(4) of the T2S Framework Agreement, according to which contracting CSDs must make all arrangements necessary to recognise account entries as irrevocable.

The target date for T2S markets to comply with the agreed rule is their migration to T2S (depending on their migration wave).

Activity status

Priority 1 – activity no 9	Definition	Monitoring	Compliance
Settlement finality III (irrevocability of transfers)	G	G	B

T2S STANDARD

According to Article 21(4) of the T2S Framework Agreement, in order to facilitate legally sound, seamless cross-border DvP settlement, the regulatory/legal environments of the CSDs participating in T2S must recognise account entries in T2S as unconditional, irrevocable and enforceable.

This is particularly relevant in cases where accounts representing legal ownership rights are maintained by the CSD in its local legacy IT system, i.e. outside T2S. In these cases – and independently of the holding model followed by each market – the harmonisation of settlement finality rules would ensure that bookings in accounts maintained in T2S are irrevocable, unconditional and enforceable.

Compliance status of T2S markets

CSDs' compliance has been monitored since the signing of the T2S Framework Agreement in 2012.

All T2S markets that have migrated to T2S are compliant with the standard (blue status).

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, ES, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK (CDCP)
Green	None
Yellow	None
Red	None

Information input: bilateral discussions and information from NSG chairpersons.

For details on the compliance status colour methodology, see Annex 1. For detailed explanations per T2S market, see Annex 4.

Monitoring

Implementation date	T2S migration date (depending on migration wave).
Monitoring actors	HSG (NSGs).
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective NSGs.

3.10 IT outsourcing (settlement services)

Activity description

The outsourcing of settlement services to T2S requires the approval of the relevant regulator, subject to applicable national laws and regulations. In the past, the AMI-SeCo identified some national legislation/regulations in the EU which could be interpreted as either prohibiting or hampering the outsourcing of settlement services.

Activity status

Priority 1 – activity no 10	Definition	Monitoring	Compliance
IT outsourcing (settlement services)	G	G	B

The issue is addressed in Article 30(5) of the CSDR, according to which CSDs may outsource their services to public entities and, in such cases, are exempted from the requirements for outsourcing stipulated in the CSDR.

The AMI-SeCo launched a survey (July 2014) to obtain clarity, under the applicable national legislation and the new CSDR provisions, as to whether and how participating CSDs in T2S would be able to outsource their services to T2S. Based

on the feedback received from the T2S markets, as well as the entry into force of the CSDR in 2014, the AMI-SeCo agreed to assign blue compliance status to all T2S markets and, therefore, to the harmonisation activity itself, since no barriers had been identified.

Compliance status of T2S markets

All T2S markets achieved blue compliance status following the adoption of the CSDR.

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, ES, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK (CDCP)
Green	None
Yellow	None
Red	None

Monitoring

Implementation date	Already achieved
Monitoring actors	HSG (NSGs).
Monitoring process	Given that compliance status is blue across all T2S markets, no further monitoring is required.

3.11 Settlement discipline regime

Activity description

At present, settlement fails³⁹ are not subject to deterrent penalties in all EU markets and settlement discipline measures, when in place, differ widely between markets.

A harmonised settlement discipline regime is needed in T2S to avoid the risk of creating multiple, inconsistent or incompatible regimes that would cause operational complexity, in particular for cross-CSD settlement. It is also required at EU level to ensure a level playing field and to avoid the risk of “regulatory arbitrage”, i.e. the shift of volumes to markets with lighter regimes and sanctions. Weak or non-harmonised

³⁹ According to the CSDR, Article 2(15), “settlement fail” means the non-occurrence of settlement, or partial settlement of a securities transaction on the intended settlement date, due to a lack of securities or cash, and regardless of the underlying cause.

settlement discipline regimes could also lead to a high number of failed transactions and might, therefore, have an impact on financial stability.

In principle, the target date by which all T2S markets should have converged towards harmonised rules is their migration to T2S (depending on their migration wave). However, current regulatory developments in the EU (such as the CSDR level 2 legislation), combined with the complexity of implementation, mean that in practice a harmonised settlement discipline regime will only be achievable for T2S markets after their migration to T2S.

Activity status

Priority 1 – activity no 11	Definition	Monitoring	Compliance
Settlement discipline regime	Y	X	X

Regulation (EU) No 909/2014 (the CSDR) includes important provisions with regard to the establishment of a harmonised settlement discipline regime in the EU. In March 2017, the relevant EU authorities enacted several CSDR regulatory technical standards, including regulatory technical standards covering the calculation of cash penalties.⁴⁰ However, the regulatory technical standards on settlement discipline are still pending.⁴¹

The expected timeline of adoption and entry into force of the regulatory technical standards (i.e. after the full T2S migration cycle) means that CSD participants will, for the time being, continue to operate within the existing domestic regulatory discipline frameworks of the relevant issuer CSDs. The AMI-SeCo is of the opinion that the prospect of the forthcoming harmonised EU settlement discipline regime, coupled with the gradual increase in cross-border activity expected after the launch of T2S, will minimise any risk of “regulatory arbitrage”. Another source of reassurance for the AMI-SeCo is the observation that current levels of settlement failures, both before and since the T2S launch, are still very low in all T2S markets.

⁴⁰ [Commission Delegated Regulation \(EU\) 2017/389 of 11 November 2016 supplementing Regulation \(EU\) No 909/2014 of the European Parliament and of the Council as regards the parameters for the calculation of cash penalties for settlement fails and the operations of CSDs in host Member States, OJ 10.3.2017, L 65, p. 1.](#)

⁴¹ On 30 June 2015, ESMA issued a [Consultation Paper on “Regulatory Technical Standards on the CSD Regulation – The Operation of the Buy-in Process”](#). On 1 February 2016, ESMA issued the [final draft Regulatory Technical Standards covering settlement discipline](#). The RTS on settlement discipline are currently under review by the European Commission.

Compliance status of T2S markets

Monitoring has not yet started.

Monitoring

Implementation date	After migration to T2S is complete.
Monitoring actors	ESMA/ESCB (in accordance with the CSDR).
Monitoring process	To be defined by ESMA/ESCB (in accordance with the CSDR).

3.12 Settlement cycles

Activity description

In EU markets, the settlement cycle timeline for transferable securities executed on trading venues and settled in a securities settlement system used to range from T+3 to T+2. The existence of differing settlement cycles would have had no impact on the core settlement process in T2S since T2S is neutral in this respect – it can accommodate different settlement cycles.

However, the establishment of a single settlement cycle in the EU was deemed crucial for T2S participants' technical infrastructures in terms of rationalising back office activities and managing cross-border corporate actions. The former non-harmonised practices rendered the management of cross-border corporate actions quite inefficient and costly, given that the deadlines for instructing in respect of relevant messages laid down in the EU corporate actions market standards are based on the notion of the settlement cycle timeline.

Activity status

Priority 1 – activity no 12	Definition	Monitoring	Compliance
Settlement cycles	G	G	B

The CSDR (Article 5) established a harmonised EU settlement cycle standard of up to T+2.

Compliance status of T2S markets

All T2S markets have achieved blue compliance status, with the Spanish market's equity segment having moved to a T+2 settlement cycle on 3 October 2016. Further monitoring of this harmonisation activity is not required.

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, ES, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK (CDCP)
Green	None
Yellow	None
Red	None

Monitoring

Implementation date	T2S migration date (depending on migration wave).
Monitoring actors	HSG (NSG) and the competent authorities supervising trading venues.
Monitoring process	The survey was launched by the ECB team in June 2014. The survey was addressed to NSGs. Afterwards, monitoring was carried out based on bilateral discussions with the relevant NSGs. Given that compliance status is blue across the board, no further monitoring is required.

CSD account structures

This topic covers the need for CSDs to offer account structures that make it possible to meet the T2S objective of efficient cross-CSD settlement.

From a T2S perspective, two harmonisation standards have been identified as essential for ensuring safe and efficient use of links in T2S. Both relate to omnibus accounts.

3.13 Availability of omnibus accounts

Activity description

This activity aims to ensure that issuer CSDs offer omnibus accounts to their foreign participants (investor CSDs and intermediaries), thereby supporting the concept of CSD interoperability and cross-border settlement inside (or even outside) T2S.

Any unavailability of omnibus accounts for foreign CSD participants would jeopardise CSD interoperability and cross-CSD settlement and would, in practice, hinder market

access for investor CSDs and foreign intermediaries. This would be against the T2S eligibility criteria for CSDs.⁴²

Activity status

Priority 1 – activity no 13	Definition	Monitoring	Compliance
Availability of omnibus accounts	G	G	B

T2S STANDARD

Issuer CSDs in T2S must offer omnibus accounts to their foreign participants (investor CSDs and intermediaries) to ensure interoperability and efficient cross-CSD settlement.

Compliance status of T2S markets

As all T2S markets have achieved blue compliance status, no further monitoring is required for this harmonisation activity.

Blue	AT, BE (Euroclear), BE (NBB-SSS), CH, DE, DK, EE, ES, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK (CDCP)
Green	None
Yellow	None
Red	None

Information input: HSG survey and bilateral discussions.

For details on the compliance status colour methodology, see Annex 1. For detailed explanations per T2S market, see Annex 4.

Monitoring

Implementation date	Already achieved.
Monitoring actors	HSG (NSGs).
Monitoring process	As the compliance status is blue across the board, no further monitoring is required.

⁴² For more information, see the [CSD eligibility criteria](#) in T2S.

3.14 Restrictions on omnibus accounts

Activity description

The objective of this activity is to ensure that issuer CSDs, in addition to offering foreign participants the possibility to open omnibus accounts (see previous section), also offer these participants, as required, appropriate services with these accounts (e.g. those related to withholding tax or proxy voting).

Any unavailability of such services is usually replaced by mandatory account segregation rules in the issuer CSDs. These rules must be propagated by investor CSDs and other intermediaries throughout the holding chain, including in the CSD link arrangements.

The failure to provide appropriate services with omnibus accounts would represent an obstacle to CSD interoperability and cross-CSD settlement inside (or even outside) T2S, as well as to market access for foreign intermediaries.

This activity focuses on restrictions that issuer market practices, as well as fiscal and regulatory obligations, place on the services offered by the issuer CSD. The activity does not cover restrictions imposed in respect of account structure that are placed on end investors and their intermediaries by the regulatory authorities of the investor's country.

T2S markets must comply with this harmonisation standard by the time they migrate to T2S.

Activity status

Priority 1 – activity no 14	Definition	Monitoring	Compliance
Restrictions on omnibus accounts	G	G	R (1)

T2S STANDARD

To make full interoperability, cross-CSD settlement and market access possible in T2S, issuer CSDs in T2S must provide appropriate services on omnibus accounts to foreign participants, as required by participants (e.g. withholding tax and proxy voting). These omnibus accounts should also include, as an option, holdings of domicile and non-domicile investors.

Compliance status of T2S markets

While omnibus accounts are offered in all T2S markets, as an option, to investor CSDs and foreign intermediaries, restrictions remain in some markets on the mandatory segregation per investor of all (or some) domiciled investors' holdings at CSD level.

One T2S market (FR) that still has restrictions on the use of omnibus accounts after migrating to T2S has been assigned red compliance status. In this market, the resolution of the issues depends on regulatory and/or legal changes (i.e. withholding tax and registration procedures). The impact of this non-compliance on the T2S Community is assessed in the AMI-SeCo's impact analysis report (Annex 3).

Blue	AT, BE (Euroclear), BE (NBB SSS), CH, DE, DK, EE, ES, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK (CDCP)
Green	None
Yellow	None
Red	FR

Information input: HSG surveys and bilateral discussions.

For details on the compliance status colour methodology, see Annex 1. For detailed explanations per T2S market, see Annex 4.

Monitoring

Implementation date	T2S migration date (depending on migration wave).
Monitoring actors	ECB team, NSGs.
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective NSGs.

3.15 Securities account numbers

Activity description

The objective of this activity is for T2S CSDs to designate a harmonised number to securities accounts in T2S. The idea is to incorporate logic into the account numbers to facilitate the identification of account holders and providers.

Compliance with the agreed standard must be achieved by all T2S markets in time for their migration to T2S (depending on their respective migration wave). CSDs should, nonetheless, be able to participate in T2S testing using the agreed numbering standard.

Activity status

Priority 1 – activity no 15	Definition	Monitoring	Compliance
Securities account numbers	G	G	B

T2S STANDARD

In securities account numbering, CSDs must use a four-digit BIC to identify parties of CSDs, plus maximum 31 digits of free text.

Compliance status of T2S markets

Based on the information provided by the NSGs, all of the markets that have migrated are operating in full compliance.

Blue	AT, BE (Euroclear), BE (NBB SSS), CH, DE, DK, EE, ES, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK (CDCP)
Green	None
Yellow	None
Red	None

Monitoring

Implementation date	Migration to T2S (depending on migration wave).
Monitoring actors	HSG (T2S CSG).
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective NSGs.

3.16 Cash account numbers

Activity description

The objective of this activity is for T2S cash account providers to assign a harmonised number to the dedicated cash accounts in T2S. The purpose is to build

logic into dedicated cash account numbering to facilitate the identification of account holders and providers.

Compliance with the agreed standard must be achieved by all T2S markets in time for migration to T2S (depending on their respective migration wave). T2S markets should, nonetheless, be able to participate in bilateral interoperability testing, multilateral testing and community testing using the agreed standard.

Activity status

Priority 1 – activity no 16	Definition	Monitoring	Compliance
Cash account numbers	G	G	B

T2S STANDARD

The dedicated cash account numbering standard includes 34 characters (one to designate the cash account, two for the country, three for the currency code, 11 for the BIC and 17 characters of free text for the account holder).

Example: CFREURBANKFRPPXXXMAIN-DCA-ACCOUNT CDEEURBANKDEFF123DCA CLIENT ALPHA

Compliance status of T2S markets

Based on the information provided by the NSGs, following completion of migration to T2S all T2S markets are now in full compliance with the T2S standard. The monitoring activities do not cover the Swiss and Hungarian markets, as their central banks are not connected to T2S.

Blue	AT, BE (Euroclear), BE (NBB SSS), CH, DE, DK, EE, ES, FR, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK (CDCP)
Green	None
Yellow	None
Red	None

Monitoring

Implementation date	Migration to T2S (depending on migration wave).
Monitoring actors	HSG (national central banks).
Monitoring process	HSG survey with national central banks in May 2013 and subsequent information provided by the NSGs. Additional information received by the ECB team in the context of the client readiness monitoring process is also considered.

4 T2S harmonisation activities – priority 2

Priority 2 activities are not essential to ensuring safe and efficient cross-CSD settlement in T2S, although they are key for the enhancement of the competitive environment and the efficiency of T2S. The T2S Community could continue to pursue these activities after the markets' migration to T2S.

4.1 Location of securities accounts/conflict of laws

Activity description

The issue of the location of accounts/conflict of laws relates to the law applicable to the transfer of securities and to CSD securities accounts.

Clarity with regard to the law applicable to securities accounts is particularly important for T2S because these accounts remain legally attributed to the CSD, regardless of the physical location of the IT infrastructure.

Conflict of laws may also be relevant to freedom of issuance – another post-trade harmonisation issue. As suggested in the CSDR, issuers should have the right to issue their securities in non-domiciled CSDs. This right may lead to an increase in the instances of conflicts of laws, occurring when non-domiciled issuers decide to issue their securities in the issuer CSD.

Activity status

Priority 2 – activity no 17	Definition	Monitoring	Compliance
Location of securities accounts/conflict of laws	Y	X	X

Although the Eurosystem and the T2S Community still support further harmonisation in this field, the AMI-SeCo has reached the conclusion that this activity may continue, even after the launch of T2S.

Nevertheless, achieving a harmonised framework should continue to be an aim and, in this respect, possible EU legislation might be the best way to deliver harmonisation in this area, since its scope would not be limited to CSDs (extending as it does to other financial institutions involved in the issuance, trading and post-trading of securities).

Following its contribution to the CMU green paper consultation (13/05/2015)⁴³, the AMI-SeCo conducted a survey with the NSGs to identify concrete examples of conflicts of laws in the T2S markets. The findings of this survey show that, although the NSGs did not report any specific instances, there are important legal divergences between national jurisdictions, e.g. different transpositions of the Settlement Finality Directive and insolvency rules, recognition of the “renvoi” concept, and national criteria for determining the “location of an account or an institution”.

The AMI-SeCo also agreed that, since the launch of T2S may lead to more visibility and a greater impact of specific conflicts of laws, the survey may need to be repeated a few years hence, once users have more experience with T2S.

The CMU action plan recognises the need “...to clarify which national law applies to any given cross-border securities transaction. To this end, the European Commission plans to enhance and broaden existing rules in the field. A modernisation of the law is even more important in view of the expected increase in cross-border securities transactions stimulated by the launch of T2S.”⁴⁴

In its Communication of 14 September 2016 with regard to the status of the CMU action plan,⁴⁵ the European Commission declared that it aims to “propose a future legislative initiative to determine with legal certainty which national law shall apply to security ownership and to third party effects of the assignment of claims”.⁴⁶ In April 2017, the European Commission issued a public consultation on conflict of laws rules for third party effects of transactions in securities and claims (from 7 April to 30 June 2017).⁴⁷ At the same time, the European Commission established an expert group⁴⁸ to provide expert advice on matters relating to conflict of laws and rules on third party effects of transactions in securities and claims, with a view to preparing a possible legislative proposal.⁴⁹ In its CMU mid-term review (June 2017),⁵⁰ the European Commission announced that there would be a legislative proposal by the end of 2017. The AMI-SeCo welcomes the European Commission’s initiative and will take account of and provide input into any future legislative proposals in this area. In light of these developments, the definition status for the harmonisation activity in respect of location of securities accounts/conflict of laws is marked yellow.

⁴³ Available at: [CMU consultation](#).

⁴⁴ See Section 6.1, page 23, of the [CMU action plan](#).

⁴⁵ See page 6 of the Communication from the Commission to the European Parliament, the Council, the European Central Bank, the European Economic and Social Committee and the Committee of the Regions: [Capital Markets Union – Accelerating Reform](#), Brussels, 14.9.2016 COM(2016) 601 final.

⁴⁶ See page 12 of the Commission Staff Working Document on [Capital Markets Union – First Status Report](#), Brussels, 25.4.2016 SWD(2016) 147 final. In that context, the Commission launched a call for tenders for a study on securities ownership rules and third-party effects of assignment of claims, which is expected to be delivered in 2017.

⁴⁷ [Consultation Document on conflict of laws rules for third party effects of transactions in securities and claims](#).

⁴⁸ [Expert group on conflict of laws regarding securities and claims](#).

⁴⁹ [Consultation document](#)

⁵⁰ COM(2017) 292 final – [Communication on the Mid-Term Review of the Capital Markets Union Action Plan](#).

Compliance status of T2S markets

Monitoring has not yet started.

Monitoring

Implementation date	Pending EU legislative proposal on conflict of laws.
Monitoring actors	Pending EU legislative proposal on conflict of laws.
Monitoring process	Pending EU legislative proposal on conflict of laws.

4.2 Corporate actions market standards

Activity description

The market standards for corporate actions processing were drawn up by the Corporate Actions Joint Working Group (CAJWG), an industry working group under the aegis of the European Commission's CESAME2 group. They were endorsed by the relevant industry bodies in 2009, and a revised version of the standards was issued in 2012.

These market standards provide the basis for the T2S corporate actions standards (see Section 3.6).

The status of markets' compliance with the CAJWG standards is monitored by the CAJWG and the E-MIG.

Activity status

Priority 2 – activity no 18	Definition	Monitoring	Compliance
Corporate actions market standards (CAJWG)	G	G	G

T2S STANDARD

T2S markets should comply with the market corporate actions standards as defined by the Corporate Actions Joint Working Group (CAJWG).

From a T2S perspective, the target date for compliance by T2S markets is migration to T2S (depending on their respective migration wave) since this is related to compliance with the T2S corporate actions market standards. T2S markets should, nonetheless, be able to participate in bilateral interoperability testing, multilateral testing and community testing, in compliance with the corporate actions market standards.

Compliance status of T2S markets

The Broad Stakeholders Group (BSG) and the E-MIG conduct frequent surveys on EEA markets' compliance with the corporate actions market standards. Responsibility for the actual implementation of the standards by market participants rests at local level with the national market implementation groups (MIGs). Coordination and monitoring at European level is the responsibility of the BSG. Progress in implementing the standards is, ultimately, reported to the European Commission. The results are also shared with the AMI-SeCo (via the ECB team) and form the basis for assessing the T2S markets' compliance in the context of the T2S harmonisation progress reports.

The compliance status assessment for the corporate actions market standards is based on a percentage score for implementation/compliance status and is assigned by the AMI-SeCo as follows: 0-40% implementation is assigned red status; 41-70% is given yellow status; 71-99% is assigned green status; while full compliance with no further monitoring required receives blue.⁵¹ It should be clarified that the AMI-SeCo is not in a position to carry out a detailed analysis of the technical and regulatory barriers present in the T2S markets (as is the case for the T2S corporate actions standards analysis – see Section 3.6).

According to the E-MIG, 20 of the 22 CSDs responded to the 2017 survey. However, responses from two markets were based on the former set of CAJWG standards and could not be interpreted, given the lack of comparability and no response was received from another market.⁵²

Of the markets that have already migrated to T2S, only Greece (BOGS) and Slovenia have achieved full compliance with the standards. However, for the majority of markets, progress is being made towards full compliance with the standards (see Annex 4 for detailed statistics for each T2S market).

⁵¹ The E-MIG monitors and reports compliance with 129 prioritised standards. Although the AMI-SeCo is not involved in maintaining or monitoring the corporate actions market standards, it receives information from the E-MIG on the T2S markets' statistical compliance.

⁵² No response was received from the Slovakian market and the ones from the German and Portuguese markets were based on the old set of 68 CAJWG and could not, therefore, be compared with other markets' answers based on the new set of 129 CAJWG standards.

Blue	GR (BOGS), SI
Green	AT, BE (Euroclear), BE (NBB-SSS), CH, DK, EE, ES, FR, IT, LT, LU (LUX CSD), LU (VP Lux), LV, MT, NL, RO
Yellow	None
Red	DE, PT, HU, SK,

Information input: BSG/E-MIG survey (2017).

Monitoring

Implementation date	Relevant for T2S: migration to T2S (depending on migration wave).
Monitoring actors	BSG (E-MIG).
Monitoring process	BSG surveys with MIGs.

4.3 Place of issuance

Activity description

This activity relates to the restrictions that are in place in national laws or market rules in EU countries with regard to the place of issuance of securities. These restrictions represent a barrier for issuers when they need to choose infrastructures and service providers.

This impediment to freedom when choosing an issuer CSD does not directly affect T2S and entails no operational/legal risks for the migration to or operation of the single platform. Nevertheless, it has an impact on competition for issuer CSD services in the respective markets.⁵³ It also constitutes a barrier to cross-border securities investment and the creation of a single capital market in the EU.

Activity status

Priority 2 – activity no 19	Definition	Monitoring	Compliance
Place of issuance	G	X	X

⁵³ This issue was raised by the Task Force on smooth cross-CSD settlement, the predecessor of the TFAX and the XMAP, in its final report to the AG (the AMI-SeCo's predecessor) in June 2011, specifically in the section concerning access and interoperability issues. The task force's report is available on the [T2S website](#).

Provisions in respect of the removal of barriers to choosing the place of issuance are included in the CSDR (Article 49). The AMI-SeCo notes the adoption of regulatory technical standards on CSD requirements in March 2017 by the relevant EU authorities, including provisions regarding the criteria for CSDs to assess issuer requests for access or for their securities to be recorded in the CSD's systems.⁵⁴ For the "receiving" CSD, and its competent authority, to refuse access to the CSD services, they should be able to establish that the "requesting" issuer does not comply with these requirements.⁵⁵ The regulatory technical standards regarding CSD requirements also include the procedural requirements for refusal of access and the possibility of involving ESMA in this process.

Following the entry into force of the CSDR level 2 legislation, the definition status of the affected harmonisation activity was changed to green. Despite this green status, the AMI-SeCo notes several barriers identified in the EPTF Report which could have an impact on freedom of issuance, and will assess whether further harmonisation work is required in this field.

Compliance status of T2S markets

Monitoring has not yet started.

Monitoring

Implementation date	Pending entry into force of CSDR level 2 legislation.
Monitoring actors	European Commission and national regulators (pending entry into force of CSDR level 2 legislation).
Monitoring process	European Commission and national regulators (pending entry into force of CSDR level 2 legislation).

⁵⁴ [Commission Delegated Regulation \(EU\) 2017/392 of 11 November 2016 supplementing Regulation \(EU\) No 909/2014 of the European Parliament and of the Council with regard to regulatory technical standards on authorisation, supervisory and operational requirements for central securities depositories](#), OJ 10.3.2017, L 65, p. 48.

⁵⁵ According to the [Regulatory Technical Standards on CSD requirements](#) (Article 89), a CSD and its competent authority, when examining an access request by an issuer, must assess a limited number of legal, financial and operational risks. With regard to legal risks, a CSD should examine whether the "requesting" issuer complies with the legal requirements for the provision of a service by the "receiving" CSD. In addition, the issuer should guarantee that the securities have been constituted in a manner that enables the receiving CSD to ensure the integrity of the issue. From a financial perspective, the issuer must have sufficient financial resources to fulfil its contractual obligations to the CSD. Finally, from an operational perspective, the issuer's access request can only be refused if the granting of access requires significant changes in the CSD's operations, affecting its risk-management procedures or the smooth functioning of the SSS operated by the receiving CSD, or if the SSS operated by the CSD cannot process the currencies requested by the issuer.

4.4 Withholding tax procedures

Activity description

Giovannini barrier 11 relates to the domestic nature of withholding tax regulations in the EU and the resulting disadvantages for non-domestic intermediaries. It is usually the case that relief at source can only be granted with the help of an entity that has tax withholding responsibilities. In many cases national tax rules reserve tax withholding responsibilities for local intermediaries, and thus “force” foreign intermediaries to use local fiscal agents. More generally, each country has its own national procedures for dealing with tax relief and these are often complex to manage for foreign investors, especially for investors in securities from multiple countries.

The barrier has a number of consequences, including the following:

- the impact of tax relief procedures on an investment decision and its return can be significant, so investors may be incentivised to invest locally to avoid dealing with complex and costly tax relief and reclaim procedures;
- remote access to issuer CSDs by foreign intermediaries may be discouraged, since foreign intermediaries are at a disadvantage vis-à-vis local intermediaries;
- the location of the issuer CSD could potentially be restricted to local CSDs.

This situation represents a burden for the industry and investors (both inside and outside T2S markets). It penalises cross-border investment, disrupts post-trade processes, increases the cost of cross-border trading and is, ultimately, fundamentally incompatible with a single European securities market.

Following the report by the Clearing and Settlement Fiscal Compliance expert group (FISCO), in October 2009 the European Commission published a Recommendation on withholding tax relief procedures,⁵⁶ outlining how EU Member States could make it easier for investors resident in one Member State to claim entitlements to relief from withholding tax on securities income (mainly dividends and interest) received from another Member State (relief at source). The European Commission's Recommendation also encourages Member States to apply quick and standardised refund procedures where, for practical reasons, they have not been able to provide relief at source, and suggests measures to protect Member States' tax revenues against errors or fraud. A European Commission services study⁵⁷ shows that costs related to the current reclaim procedures are currently estimated at €1.21 billion per year, while the amount of foregone tax relief is estimated at €6.03 billion per year, and the opportunity costs arising from delayed claims and payment of tax refunds

⁵⁶ See the COM (2009) 7924 final – [Recommendation on withholding tax relief procedures](#).

⁵⁷ See the study on “The Economic Impact of the Commission Recommendation on [Withholding Tax Relief Procedures](#) and the FISCO Proposals”

are estimated at €1.16 billion per year. In January 2016 the total cost of withholding tax refund processes was estimated at a total of €8.4 billion per year.

With regard to tax relief on booked positions, no substantial risks to T2S operations have been identified in the absence of a resolution on this topic, although this does raise cross-border access issues. There is also an interconnection between this activity and activity 6 (on corporate actions), as national withholding tax rules may affect the calculation of market claims. The AMI-SeCo is therefore of the opinion that further delays in progress on this topic could have an impact on settlement efficiency and cross-border access issues in the affected markets.

Activity status

Priority 2 – activity no 20	Definition	Monitoring	Compliance
Withholding tax procedures	R	X	X

In 2013 the Tax Barriers Business Advisory Group (T-BAG), the expert group created in 2010 to follow up on the European Commission’s Recommendation, issued its final report to the European Commission regarding workable solutions for the implementation of the principles set out in the earlier European Commission Recommendation.⁵⁸

The AMI-SeCo is of the view that any further initiatives should have a strong EU impetus and can only come from EU public authorities (maybe a new legislative initiative by the European Commission). In this context, the AMI-SeCo welcomes the fact that the CMU action plan lists further work on withholding tax procedures as one of the priority areas for action.⁵⁹

To build on this political momentum and encourage Member States to simplify withholding tax relief procedures, the European Commission is gathering further evidence regarding the economic impact of burdensome withholding tax relief and refund procedures. This investigation is currently being conducted by the expert group on national barriers to free movement of capital in the context of CMU.⁶⁰ In particular, the group has collected information on those good practices in this area already followed by Member States.

The AMI-SeCo contributed to this exercise in March 2016 by collecting relevant stock-taking information from the T2S markets.

⁵⁸ The [T-BAG report](#) is available from the European Commission’s website.

⁵⁹ COM(2015) 468/30.9.2015, Action Plan on Building a Capital Markets Union, page 25: “To encourage Member States to adopt systems of relief-at-source from withholding taxes and to establish quick and standardised refund procedures, the Commission will promote best practice and develop a code of conduct with Member States on withholding tax relief principles.”

⁶⁰ [Expert group on national barriers](#).

The European Commission published a non-paper on withholding tax procedures for discussion at the Expert Group on Barriers to Free Movement of Capital in September 2016.⁶¹ The non-paper described the current problems and proposed – for discussion at the Expert Group on Barriers to Free Movement of Capital – a number of next steps regarding the further sharing of best practices and the joint monitoring of the situation in Member States. In addition, in March 2017 the European Commission published a report on national barriers to capital flows⁶² in which it pointed out, inter alia, the discriminatory and burdensome procedures regarding withholding tax relief in cross-border settings and set out a roadmap of proposed actions in the field of withholding tax: the assessment of best practices, the commitment of Member States to a list of best practices, and work on a code of conduct in respect of WHT relief principles. In its CMU mid-term review (June 2017),⁶³ the European Commission reiterated its commitment to the work on developing a code of conduct on withholding tax procedures – with a focus on refunds – by the end of 2017. The AMI-SeCo welcomes the European Commission’s initiative on a code of conduct but notes that its scope is not likely to address the full range of issues covered under the relevant T2S harmonisation activity (No 20 in Table 1), e.g. the fiscal status of cash entitlements. The AMI-SeCo contributed actively to the EPTF’s work on this matter.

Compliance status of T2S markets

Monitoring has not yet started.

Monitoring

Implementation date	To be defined.
Monitoring actors	To be defined.
Monitoring process	To be defined.

⁶¹ [Non-paper on withholding tax procedures](#)

⁶² [COM\(2017\) 147 final – Report on addressing national barriers to capital flows.](#)

⁶³ [COM\(2017\) 292 final – Communication on the Mid-Term Review of the Capital Markets Union Action Plan.](#)

4.5 Cross-border shareholder transparency and registration procedures

Activity description

This activity covers the two connected areas of cross-border shareholder transparency and the registration procedures⁶⁴ linked to the issuer CSD's operating and regulatory frameworks.

With regard to shareholder transparency for registered securities, in most EU countries there are effective models used to identify domestic shareholders. However, there is no harmonised European model that enables issuers to identify their owners in a cross-border environment. Issuers have, therefore, pointed out that owing to increased cross-border activity in T2S, shareholder transparency issues might emerge across borders. A key concern is how to retrieve specific shareholder information via the omnibus account in CSD link arrangements. The AMI-SeCo has agreed that the resolution of this issue is important, although this should not affect the current scope of T2S services. This activity is therefore considered to be priority 2. One resolution that could be considered in future releases of T2S could, potentially, include a centralised solution via the T2S platform.

One determining aspect relating to shareholder disclosure is the registration rules and procedures according to which the issuer CSD operates. Registration procedures for certain securities have long been recognised as one of the most difficult and complex areas for harmonisation in some jurisdictions. Procedures are usually based on long-standing legal and regulatory rules (e.g. regarding the owner of a registered instrument or the investor's rights over the same asset). Registration procedures, and the mechanisms used to transmit registration information, vary considerably between European countries. They are particularly complex and can, in some cases, affect both the issuance/central safekeeping services of a CSD, as well as settlement services.

The AMI-SeCo agrees that if registration procedures remain non-harmonised, this may have a negative effect on the efficiency of cross-CSD settlement in T2S. It could also affect market access, which is particularly important for investor CSDs in T2S.

⁶⁴ The registration procedure is the procedure for updating a register (managed by a registrar) that contains information on the identity (name, address, etc.) of shareholders in a company.

Activity status

Priority 2 – activity no 21	Definition	Monitoring	Compliance
Cross-border shareholder transparency and registration procedures	R	X	X

The issue of shareholder transparency was addressed in the early stages of the T2S project by a dedicated T2S group (Task Force on Shareholder Transparency)⁶⁵ set up by the AMI-SeCo in December 2009. The task force presented its final report to the AMI-SeCo in March 2011. The report included a description of possible decentralised and centralised technical models (one of the options was the T2S platform) for exchanging shareholder information on a cross-border basis. The conclusions of the task force were supported by the vast majority of the AG.

Setting to one side the centralised model for possible consideration in a future release of T2S, the AMI-SeCo used the suggestions contained in the report to invite a number of actors to work on possible decentralised solutions. The proposals put forward were: the creation of an ISO disclosure message standard; an amendment to the Transparency Directive; and a possible market practice for exchanging shareholders' disclosure requests and responses, to be developed by the market via ECSDA.

Against this backdrop, the AMI-SeCo members welcome the recasting of the Shareholder Rights Directive (SRD)⁶⁶ which was enacted in May 2017 and must be transposed into the national law of Member States by 10 June 2019. The recasting could improve the European framework for cross-border shareholder identification but does not address all issues related to the T2S harmonisation activity on shareholder transparency/registration, i.e. it does not address registration requirements. In particular, the recasting requires Member States to ensure that companies (or a third party nominated by the company) have the right to identify their shareholders. Intermediaries (including CSDs, third-party service providers etc.) must communicate information regarding shareholder identity⁶⁷ to issuers or to other third parties nominated by the issuers. The European Commission is expected to adopt implementing technical standards on shareholder identification by 10 September 2018, covering the format of information to be transmitted, the format of requests, including their security and interoperability, and the deadlines to be

⁶⁵ More information is available on [the task force](#).

⁶⁶ Directive (EU) 2017/828 of the European Parliament and of the Council of 17 May 2017 amending Directive 2007/36/EC with regard to the encouragement of long-term shareholder engagement (text with EEA relevance), OJ L 132, 20.5.2017, pp. 1-25.

⁶⁷ Article 3a(1) of the revised SRD. Member States are allowed to introduce a threshold not exceeding 0.5% for companies that have a registered office in their territory. According to Article 3a(7) of the revised SDR, Member States must communicate to ESMA (by 10 June 2019) information on whether they have limited shareholder identification to shareholders holding more than a certain percentage of the shares or voting rights in accordance with paragraph 1 and, if so, the applicable percentage. ESMA will publish that information on its website.

complied with.⁶⁸ In that context, the AMI-SeCo will examine whether further harmonisation is needed in relation to the definition of the information regarding shareholder identity⁶⁹ as well as the format/deadlines for the transmission of such information.

As far as the impact of heterogeneous registration procedures on cross-CSD settlement in T2S is concerned, the TFAX analysed this area in its 2012 report. One of the results of this work was the recommendation endorsed by the AMI-SeCo (former AG) in February 2013 not to use T2S messages for transmitting registration information. This standard is covered in Section 3.3.

However, the AMI-SeCo and ECSDA⁷⁰ recognise that further important steps must be taken to achieve full harmonisation in respect of the management of registration procedures in T2S markets (especially in a cross-CSD context). Given the complexity and the regulatory/legal implications of the registration topic, the AMI-SeCo has raised it with the EPTG, and also in the context of its contribution to the Commission's CMU initiative and the EPTF.

In 2013 the EPTG identified cross-border shareholder transparency, including the related topic of registration procedures, as one of the main action points on its agenda. A working group on registration and shareholder identification was set up by the EPTG to work on the matter and a follow-up to this was undertaken by its successor, the EPTF. The EPTF report identifies the lack of harmonisation of registration and investor identification rules and processes as a significant post-trade barrier. The AMI-SeCo notes the findings of the EPTF report and will assess whether further harmonisation work is required in this field.

Compliance status of T2S markets

Definition is not yet complete, and no standards have been endorsed. Monitoring is therefore yet to start.

⁶⁸ Article 3a(8) of the revised SRD.

⁶⁹ According to Article 2(j), the “information regarding shareholder identity” includes at least the following information: i) name and contact details (including full address and, where available, email address) of the shareholder and, where this is a legal person, registration number or, if no registration number is available, a unique identifier, such as a legal entity identifier; ii) the number of shares held; and iii) only insofar they are requested to by the company, one or more of the following details: the categories or classes of the shares held or the date from which the shares have been held.

⁷⁰ An [ECSDA report](#) dated 19 July 2016 on the registration of securities holders examines the diverging registration rules among jurisdictions and flags the need to progressively harmonise registration requirements across Europe.

Monitoring

Implementation date	Pending EPTF and CMU outcome.
Monitoring actors	Pending EPTF and CMU outcome.
Monitoring process	Pending EPTF and CMU outcome.

4.6 Market access and interoperability

Activity description

The activity is fundamental for enhancing financial integration in the EU. It reflects the need for regulatory frameworks to allow CSDs to provide requesting parties (i.e. foreign and market participants, CSDs and other market infrastructures) with access to their services. It also reflects the need to provide a European framework of rules and procedures for granting or refusing this access.

The activity covers, for example, market practices or legislation that obligate or restrict the settlement of (stock exchange and/or central counterparty-cleared) transactions in a specific issuer CSD. The consequence for foreign investors, custodians and/or investor CSDs in such (issuer) markets is that access to settlement flows is restricted because of the unfair competitive advantages that are established in those issuer markets. The restriction implies that entities wishing to offer settlement services on these securities need to become participants in the issuer CSD or central counterparty.

The issue has no direct impact on T2S settlement processes, although it is important for competition and CSD access conditions in T2S-relevant markets.

Activity status

Priority 2 – activity no 22	Definition	Monitoring	Compliance
Market access and interoperability	G	X	X

The CSDR includes important provisions regarding market access and interoperability (Articles 51-53). The AMI-SeCo notes the adoption of the regulatory

technical standards for CSD requirements in March 2017⁷¹ and welcomes the provisions regarding the criteria used by CSDs to evaluate access of “requesting parties” (i.e. CSD participants, other CSDs and other infrastructures) to their systems. For the “receiving” CSD, and its competent authority, to refuse access to CSD services, they must be able to establish that the requesting party does not comply with these requirements.⁷² The regulatory technical standards also include the procedural requirements for refusal of access and the possibility of involving ESMA in this process.

Following the adoption of the regulatory technical standards on CSD requirements, the AMI-SeCo assigns, in principle, green definition status to the harmonisation activity market access and interoperability. However, the AMI-SeCo will keep the issue on its radar and assess whether further harmonisation work will be required.

Compliance status of T2S markets

Monitoring has not yet started.

Monitoring

Implementation date	CSDR and level 2 legislation.
Monitoring actors	CSDR and level 2 legislation.
Monitoring process	CSDR and level 2 legislation.

⁷¹ [Commission Delegated Regulation \(EU\) 2017/392 of 11 November 2016 supplementing Regulation \(EU\) No 909/2014 of the European Parliament and of the Council with regard to regulatory technical standards on authorisation, supervisory and operational requirements for central securities depositories](#), OJ 10.3.2017, L 65, p. 48.

⁷² According to the [Regulatory Technical Standards on CSD requirements](#) (Article 89), the receiving CSD and its competent authority, when examining an access request, must assess limited legal, financial and operational risks, which relate to the requesting party. With regard to legal risks, a CSD may examine the following criteria for access requests by participants, CSDs and CCPs. One aspect is compliance with the legal requirements for participation in the SSS operated by the CSD and the confidentiality of the information provided through the SSS operated by the CSD. For access requests by trading venues, a CSD must examine only the requirement of confidentiality. From a financial perspective, a CSD and its competent authority must only examine whether the requesting participant holds sufficient financial resources to fulfil its contractual obligations to the CSD. Finally, the operational risks justifying the refusal of access by a participant, CSD or CCP are: a lack of operational capacity to participate in the CSD; non-compliance with the risk-management rules of the receiving CSD; a lack of business continuity policies or disaster recovery plans; and if the granting of access requires the receiving CSD to make significant changes to its operations, affecting its risk-management procedures and endangering the smooth functioning of the securities settlement system operated by the receiving CSD. For requests by trading venues, the CSD and its competent authority only examines the last aforementioned operational risk.

4.7 Securities amount data

Activity description

This activity seeks to address the absence of a standardised practice across all T2S markets for defining securities amount data (face value/nominal amount vs. quantity/units) in the trading, clearing and settlement chain.

The non-standardisation of securities quantity data has no impact on T2S settlement as long as only one rule is used for each ISIN in T2S (either the nominal amount (FAMT) or quantity/units (UNIT)).⁷³

However, the current practice in some markets may create difficulties for foreign entities (investor CSDs and custodians) that wish to offer services for securities in those markets.

The objective of this activity is to ensure that all T2S markets are aligned with the EU's standard practice in time for migration to T2S (depending on their respective migration waves). T2S markets should, nonetheless, be able to participate in bilateral interoperability testing, multilateral testing and community testing, using the agreed shared practice.

Activity status

Priority 2 – activity no 23	Definition	Monitoring	Compliance
Securities amount data	G	G	R (1)

T2S STANDARD

In line with the current standard market practice in the EU, T2S markets should define securities amount data by using nominal value for debt instruments and units for non-debt instruments (i.e. debt instruments in FAMT and equities in UNIT).

⁷³ For each T2S settlement instruction, T2S verifies whether the type of settlement amount in the settlement instruction (face amount or number of units) matches the type of amount as defined for a given ISIN in the T2S static data. This makes it impossible for a T2S actor to instruct T2S in both nominal amount (FAMT) and units (UNIT) for the same ISIN. T2S actors should select in advance, for a given ISIN, only one of these settlement amount types.

Compliance status of T2S markets

Based on the information provided by the NSGs, all T2S markets, with one exception (FR), comply fully with the standard. In the French market there are limited cases of debt securities (fewer than 2% of ISINs) which are denominated in UNIT. These limited cases of non-compliance relate to a technical constraint in the CSD system that does not allow decimalisation for these debt instruments.

Blue	AT, BE (Euroclear), BE (NBB SSS), CH, DE, DK, EE, ES, GR (BOGS), HU, IT, LT, LU (LUX CSD), LU (VP LUX), LV, MT, NL, PT, RO, SI, SK
Green	None
Yellow	None
Red	FR

Information input: NSG survey and bilateral discussions.

For details on the compliance status colour methodology, see Annex 1. For detailed explanations per T2S market, see Annex 4.

Monitoring

Implementation date	Migration to T2S (depending on migration wave).
Monitoring actors	HSG (NSGs).
Monitoring process	Compliance is monitored by the ECB team in cooperation with the respective NSGs. Monitoring is a continuous process taking place before and after each T2S market migrates to T2S.

4.8 Portfolio transfer

Activity description

The TFAX analysis⁷⁴ reveals obstacles in the context of portfolio transfers⁷⁵ that call for further harmonisation efforts in T2S markets. Each T2S market currently has its own requirements in terms of the information that must be provided by the delivering custodian to the receiving custodian during a portfolio transfer.

In view of increasing cross-border business and cross-border portfolio transfers, this is likely to lead to a high level of complexity in information gathering and maintenance for CSDs and CSD participants involved in portfolio transfers. In the

⁷⁴ The [TFAX report](#) is available in the relevant section of the T2S website.

⁷⁵ Portfolio transfers (or book transfers) occur when a client changes custodian or bank.

context of T2S, this could lead to the manifestation of additional complexities for the actors involved in terms of information gathering and maintenance.

The T2S Community has agreed, in line with the TFAX recommendation, that the information required by the receiving custodians should be harmonised as much as possible to ensure smooth cross-CSD settlement.

Activity status

Priority 2 – activity no 24	Definition	Monitoring	Compliance
Portfolio transfer	Y	X	X

Following the AMI-SeCo Chairman's letter to the European Banking Federation, the European Working Group on Portfolio Transfers (EWGPT) was set up in November 2014. Its objective is to define regional best market practices in T2S. The best practices cover the following:

- descriptions and recommendations in respect of the workflow and channel of information for portfolio transfer messages;
- the data to be transmitted in these portfolio transfer messages;
- how portfolio transfer messages should be populated.

The HSG is currently analysing options for a possible T2S harmonisation standard or market practice. Any solution should, on the one hand, support the T2S actors in the exchange of portfolio information although, on the other hand, it should be fully consistent with the T2S functionalities and the T2S harmonisation standards.

Monitoring

Implementation date	To be defined.
Monitoring actors	To be defined.
Monitoring process	To be defined.

Annex 1

Methodology

The following methodology is used to compile the deliverables of the HSG to the AMI-SeCo (progress report, T2S harmonisation list and status update dashboard).

Harmonisation activities

A harmonisation activity is a task or a workstream that must be completed to remove a barrier to smooth cross-CSD settlement in T2S markets. Some activities are grouped under broader areas.

Example:

Area: *Legal harmonisation*

Activities: *SF I, SF II, SF III, outsourcing, conflict of laws*

Prioritisation of activities

The AMI-SeCo agreed to prioritise the T2S harmonisation work as outlined below.

Priority 1 activities are necessary to ensure efficient and safe cross-CSD settlement in T2S. The HSG and the ECB team should view the resolution and implementation of these activities as the top priority **before the markets' migration to T2S**.

The fact that an activity is assigned priority 1 does not imply that the HSG will be the key definition or monitoring actor (e.g. T2S ISO messages, legal harmonisation).

Priority 2 activities are not essential to ensure safe and efficient cross-CSD settlement in T2S, although they are essential for the enhancement of the competitive environment and the efficiency of T2S. The T2S Community could continue to pursue these after the markets' migration to T2S.

Harmonisation phases

The three harmonisation processes/phases for each activity in the T2S harmonisation list are definition, monitoring and implementation. Each of these phases corresponds to a different aim/question.

Definition: This refers to the T2S (or, where relevant, wider European) standards/rules definition process. What are the standards and who is responsible for defining and endorsing them?

Monitoring: What is the monitoring framework and who are the actors responsible for monitoring T2S markets' compliance with the harmonisation standards/rules?

Implementation: This phase/process refers to the T2S markets' compliance with the relevant harmonisation standards. What is the process, and who ultimately needs to

implement changes and adapt to the harmonisation standards/rules? What is the implementation status for each T2S market?

Responsible actors

For each process/phase, clearly defined responsible actors and concrete deadlines are proposed.

- Definition actors: entities responsible for defining the standard (e.g. the AMI-SeCo supported by HSG/CASG for the T2S corporate actions standards, EU or national authorities for withholding tax procedures, CAJWG for corporate actions market standards).
- Monitoring actors: entities responsible for monitoring compliance of T2S markets with the standard (e.g. the AMI-SeCo supported by HSG/CASG for the T2S corporate actions standards, E-MIG for the corporate actions market standards).
- Implementation actors: entities responsible for ultimately implementing changes and adapting to the standard (e.g. CSDs, their participants and perhaps regulators for some T2S corporate actions standards).

Dates

A deadline for completion is set for each phase. In most cases the deadline for compliance coincides with the migration of each market to T2S (depending on the respective migration wave). However, for most technical standards T2S markets/CSDs must be able to participate in the interoperability testing phase, abiding by the agreed rules and standards in the test environment.

T2S markets should comply fully with all defined and monitored standards prior to their migration to T2S.

Status assessment

A specific colour, based on a four-colour scheme, is displayed in the status update dashboard to reflect the progress made in each process (definition, monitoring and compliance). These colours/statuses are agreed at AMI-SeCo level, based on the proposals of the HSG (and the input of the NSGs, CSDs and other reporting actors).

Table 7
Colour methodology in the different harmonisation processes

Colour	Description
Blue	<p>Compliance</p> <p>The market has achieved full compliance with the harmonisation standard.</p> <p>For technical standards (e.g. T2S ISO messages), this means that the T2S market is already operating in compliance with the standard.</p> <p>For regulatory/legal standards (e.g. T2S settlement finality rules), this means that the relevant regulation/legislation is already in place.</p> <p>Further monitoring of the T2S market is no longer required.</p>
Green	<p>Definition</p> <p>The relevant stakeholder bodies (inside or outside T2S) have defined and agreed/endorsed the standards for the harmonisation activity.</p> <p>Monitoring</p> <p>The monitoring actors (inside or outside T2S) have defined and implemented a framework for monitoring and reporting progress on the T2S markets' compliance with the harmonisation standard. The T2S markets report regularly to the responsible stakeholder bodies.</p> <p>Compliance</p> <p>Changes are still pending (technical, regulatory or legal) before the T2S market can achieve full compliance with the harmonisation standard, although no obstacles have been identified to achieving full compliance by the deadline.</p> <p>and</p> <p>The market has established a clear/detailed plan for implementing the harmonisation standard and has publicly announced deadlines for full implementation.</p> <p>Further monitoring of the T2S market is required.</p>
Yellow	<p>Definition</p> <p>Issues are still open with regard to the definition and agreement of the standards for the harmonisation activity by the relevant stakeholder bodies (inside or outside T2S). However, stakeholders have agreed a roadmap, as well as an approach for resolving pending issues, in order to reach agreement on the standard.</p> <p>Monitoring</p> <p>The monitoring actors (inside or outside T2S) have defined and implemented a framework for monitoring and reporting progress on the T2S markets' compliance with the harmonisation standard. The T2S markets report to the monitoring bodies, although not regularly.</p> <p>Compliance</p> <p>Changes are still pending (technical, regulatory or legal) before the T2S market can achieve full compliance with a given harmonisation standard, although obstacles have been identified which may threaten the achievement of full compliance by the deadline.</p> <p>or</p> <p>The T2S market has issued a statement declaring that it will implement the standard, although it has not yet committed to concrete and publicly announced dates for the implementation.</p> <p>Further monitoring of the T2S market is required.</p>
Red	<p>Definition</p> <p>Relevant stakeholder bodies (inside or outside T2S) have not reached agreement on the definition of the standard and stakeholders have not agreed a roadmap or an approach for achieving agreement on the standard. Stakeholders have not agreed a formal plan for achieving compliance with the standards.</p> <p>Monitoring</p> <p>The monitoring stakeholders have not defined and/or have not implemented a framework for monitoring and reporting progress on the T2S markets' compliance with the harmonisation standard.</p> <p>Compliance</p> <p>The T2S market has not provided any information on its level of compliance with the standard.</p> <p>or</p> <p>The T2S market has decided not to (fully) comply with the standard.</p> <p>or</p> <p>Changes are still pending (technical, regulatory or legal) before the T2S market can achieve full compliance with the harmonisation standard and obstacles have been identified that have halted the implementation plan for the market and/or will prevent its full implementation by the deadline.</p> <p>Further monitoring of the T2S market is required.</p>
X	Process not yet started

It follows from Table 7 that only blue and red statuses apply to markets that have already migrated. This is because green and yellow statuses refer, exclusively, to future implementation plans.

AMI-SeCo monitoring methodology⁷⁶

The HSG only monitors T2S harmonisation activities for which the definition process is complete, i.e. a standard/rule/agreement has been defined and endorsed by the relevant actors. The definition may come from the AMI-SeCo (e.g. T2S corporate actions standards) or from EU authorities (e.g. the CSDR), although the AMI-SeCo ultimately endorses all T2S harmonisation standards. The AMI-SeCo monitoring process, for a specific standard and all T2S markets, is only launched afterwards.

Once the definition process is complete (i.e. the AMI-SeCo has endorsed it and assigned green status to the activity), the HSG – with the help of the ECB team – launches the monitoring process. The ECB team acts as the contact point or secretariat in this process. For some activities, this monitoring may be launched by external parties (e.g. the E-MIG for the corporate actions market standards).

There is a section on monitoring for each of the T2S harmonisation activities covered in this report. This section has three key elements:

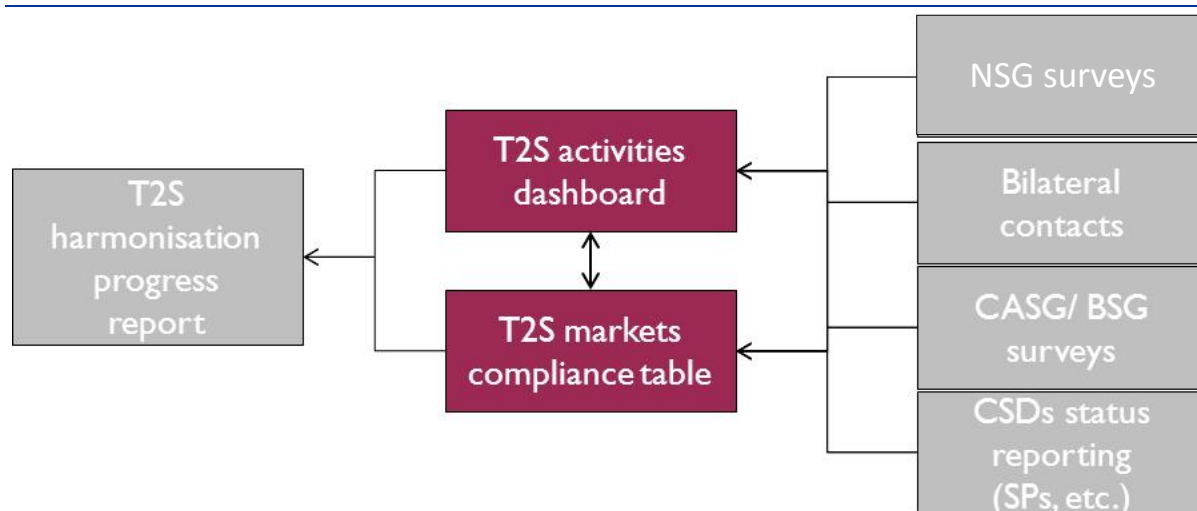
- the implementation date, by which time the standard/agreement must be implemented by the T2S markets;
- the monitoring actors, i.e. who is performing the monitoring process (e.g. the ECB team, NSGs, E-MIG);
- the monitoring process, which describes what the process consists of (e.g. NSG surveys, CASG surveys).

The information provided for individual T2S markets and activities may be obtained from more than one source. For example, NSGs provided information on SF II and SF III, although this point was also covered by most T2S actors in the feasibility assessments they sent to the ECB team prior to the launch of T2S. As shown in Diagram 1, the different input channels (NSG surveys, CASG/CAJWG surveys, bilateral contacts and synchronisation point (SP) reporting) feed into the different monitoring tools (the T2S activities dashboard and the T2S markets compliance table). The results are summarised in the T2S harmonisation progress reports published by the AMI-SeCo on the ECB/T2S webpages.

⁷⁶ As agreed by the AG (the AMI-SeCo's predecessor) on 27 March 2012.

Diagram 1

Information channels for monitoring T2S harmonisation



Compliance statuses are presented by market (rather than by CSD) in the T2S harmonisation progress reports. Compliance usually depends on national market practice, specificities or even regulations, rather than on an individual CSD's business model. In markets with more than one CSD, the name of the relevant CSD is used to flag differing levels of implementation progress.

In the case of corporate actions market standards, colours are assigned to T2S markets based on a statistical approach, as described in Section 4.2.

Annex 2

Monitored harmonisation activities by market

Table 8
Colour methodology in the compliance processes

Colour	Description
B	<p>The market has achieved full compliance with the harmonisation standard.</p> <p>For technical standards (e.g. T2S ISO messages), this means that the T2S market is already operating in compliance with the standard.</p> <p>For regulatory/legal standards (e.g. T2S settlement finality rules), this means that the relevant regulation/legislation is already in place.</p> <p>Further monitoring of the T2S market is no longer required.</p>
G	<p>Changes are still pending (technical, regulatory or legal) before the T2S market can achieve full compliance with the harmonisation standard, although no obstacles have been identified to achieving full compliance by the deadline.</p> <p>and</p> <p>The market has established a clear/detailed plan for implementing the harmonisation standard and has publicly announced deadlines for full implementation.</p> <p>Further monitoring of the T2S market is required.</p>
Y	<p>Changes are still pending (technical, regulatory or legal) before the T2S market can achieve full compliance with a given harmonisation standard, but obstacles have been identified which may threaten the achievement of full compliance by the deadline.</p> <p>or</p> <p>The T2S market has issued a statement declaring that it will implement the standard, although it has not yet committed to concrete and publicly announced dates for implementation.</p> <p>Further monitoring of the T2S market is required.</p>
R	<p>The T2S market has not provided any information on its level of compliance with the standard.</p> <p>or</p> <p>The T2S market has decided not to (fully) comply with the standard.</p> <p>or</p> <p>Changes are still pending (technical, regulatory or legal) before the T2S market can achieve full compliance with the harmonisation standard and obstacles have been identified that have halted the implementation plan of the market and/or will prevent its full implementation by the deadline.</p> <p>Further monitoring of the T2S market is required.</p>
R- [date]	<p>As above, full compliance will not be achieved by the time the market migrates to T2S, although the NSG has agreed to and provided a detailed action plan for full compliance by a specific date after migration to T2S.</p>

Table 2 [from Executive Summary]

Compliance status by T2S market (as at 20/12/2017)

T2S markets	Priority 1															Priority 2	
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (regist- ration)	4 Interaction with T2S (tax procedure)	5 Schedule for the settlement day	6 T2S CA standards	7 T2S settlement finality I	8 T2S settlement finality II	9 T2S settlement finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data
AT	B	B	B	B	Blank	R-?	B	B	B	B	B	B	B	B	B	G	B
BE Euroclear	B	B	B	B	Blank	R-Mar 2018	B	B	B	B	B	B	B	B	B	G	B
BE – NBB-SSS	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
CH	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	N/A	G	B
DE	B	B	B	B	Blank	R-?	B	B	B	B	B	B	B	B	B	R-No info	B
DK	B	B	B	B	Blank	R-?	B	B	B	B	B	B	B	B	B	G	B
EE	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
ES	B	R-?	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
FI	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
FR	B	B	B	B	Blank	R-Mar 2018	B	B	B	B	B	B	R-?	B	B	G	R
GR – BOGS	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	B	B
HU	N/A	R-?	B	B	Blank	R-?	B	B	B	B	B	B	B	B	N/A	R	B
IT	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
LT	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
LU – LUX CSD	B	B	B	B	Blank	R-Mar 2018	B	B	B	B	B	B	B	B	B	G	B
LU – VP LUX	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
LV	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
MT	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
NL	B	B	B	B	Blank	R-Mar 2018	B	B	B	B	B	B	B	B	B	G	B
PT	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	R-No info	B
RO	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
SI	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	B	B
SK (CDCP)	B	R-?	B	B	Blank	R-Mar 2018	B	B	B	B	B	B	B	B	B	R-No info	B

Table 9

Compliance status of T2S markets in the first migration wave (as at 20/12/2017)

T2S markets						Priority 1						Priority 2					
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (regis- tration)	4 Interaction with T2S (tax procedure)	5 Schedule for the settlement day	6 T2S CA standards	7 T2S settlement finality I	8 T2S settlement finality II	9 T2S settlement finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data
CH	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	N/A	G	B
GR – BOGS	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	B	B
IT	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
MT	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
RO	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B

Table 10

Compliance status of T2S markets in the second migration wave (as at 20/11/2017)

T2S markets	Priority 1											Priority 2					
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (regis- tration)	4 Interaction with T2S (tax procedure)	5 Schedule for the settlement day	6 T2S CA standards	7 T2S settlement finality I	8 T2S settlement finality II	9 T2S settlement finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data
BE – NBB-SSS	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
PT	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	R-No info	B

Table 11

Compliance status of T2S markets in the third migration wave (monitoring status: 20/12/2017)

T2S markets	Priority 1															Priority 2	
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (registration)	4 Interaction with T2S (tax procedure)	5 Schedule for the settlement day	6 T2S CA standards	7 T2S settlement finality I	8 T2S settlement finality II	9 T2S settlement finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data
BE Euroclear	B	B	B	B	Blank	R-Mar 2018	B	B	B	B	B	B	B	B	B	G	B
DK	B	B	B	B	Blank	R-?	B	B	B	B	B	B	B	B	B	G	B
FR	B	B	B	B	Blank	R-Mar 2018	B	B	B	B	B	B	R-?	B	B	G	R
LU – VP LUX	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	Y	B
NL	B	B	B	B	Blank	R-Mar 2018	B	B	B	B	B	B	B	B	B	G	B

Table 12

Compliance of the fourth wave of T2S markets which migrated on 6/02/2017 (monitoring status: 20/12/2017)

T2S markets	Priority 1															Priority 2	
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (registration)	4 Interaction with T2S (tax procedure)	5 Schedule for the settlement day	6 T2S CA standards	7 T2S settlement finality I	8 T2S settlement finality II	9 T2S settlement finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data
AT	B	B	B	B	Blank	R-?	B	B	B	B	B	B	B	B	B	G	B
DE	B	B	B	B	Blank	R-?	B	B	B	B	B	B	B	B	B	R-No info	B
HU	N/A	R-?	B	B	Blank	R-?	B	B	B	B	B	B	B	B	N/A	R	B
LU – LUX CSD	B	B	B	B	Blank	R-Mar 2018	B	B	B	B	B	B	B	B	B	Y	B
SI	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	B	B
SK (CDCP)	B	R-?	B	B	Blank	R-Mar 2018	B	B	B	B	B	B	B	B	B	R-No info	B

Table 5 [from Executive Summary]

Compliance status of final wave T2S markets which migrated on 18/09/2017 (monitoring status: 20/12/2017)

T2S markets	Priority 1															Priority 2	
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (registration)	4 Interaction with T2S (tax procedure)	5 Schedule for the settlement day	6 T2S CA standards	7 T2S settlement finality I	8 T2S settlement finality II	9 T2S settlement finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data
EE	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
ES	B	R-?	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
LT	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B
LV	B	B	B	B	Blank	B	B	B	B	B	B	B	B	B	B	G	B

Table 6 [from Executive Summary]

Compliance of SK (NCDPC) which plans to migrate on 27/10/2017 (monitoring status: 20/12/2017)

T2S markets	Priority 1															Priority 2	
	1 T2S messages ISO 20022	2 T2S matching fields	3 Interaction with T2S (registration)	4 Interaction with T2S (tax procedure)	5 Schedule for the settlement day	6 T2S CA standards	7 T2S settlement finality I	8 T2S settlement finality II	9 T2S settlement finality III	10 Outsourcing IT (settlement) services	12 Settlement cycle	13 Availability of omnibus accounts	14 Restrictions on omnibus accounts	15 Securities account number	16 Cash account number	18 CA market standards (CAJWG)	23 Securities amount data
SK (NCDPC)	B	R-?	B	B	Blank	R-?	B	B	B	B	B	B	B	B	B	R-No info	B

Annex 3

Non-compliance impact analysis

Table 13 covers the Austrian, Belgian (Euroclear), German, French, Hungarian, Dutch, Spanish, Danish, Luxembourgish (LuxCSD) and Slovakian markets where i) there is at least one red compliance status for priority 1 standards (status at 19/12/2017) and ii) the impact of their non-compliance has been analysed and assessed by the AMI-SeCo⁷⁷.

Table 13
Summary of the AMI-SeCo's impact analysis (status: 20/12/2017)

T2S market	T2S standard	Compliance gap	NSG-specified milestone and completion date	Status	Remark
Austria	T2S corporate actions standards	Market claims standards 6 and 7: the Austrian market will disregard the "opt-out", "ex" and "cum" flags when generating market claims in T2S; Market claims standards 19 and 23: the Austrian CSD will not provide its participants with a "user friendly facility" for them to monitor the interdependence of the settlement of the market claim with that of the underlying transaction. ⁷⁸	None	Implementation date still not available.	
Germany	T2S corporate actions standards	No concept of "record date" exists in Germany. No usage of the "cum" flag in market claim detection (MC standard no 7). Generation of market claims only after the settlement of the underlying transaction (MC standards 19 and 23).	Implementation of "record date" in the German market: 1 January 2016. None. None.	Although the German Parliament approved the necessary change to legislation in November 2015, the change only entered into force on 1 January 2017. Implementation date still not available. Implementation date still not available. The German Market Practice Committee is not in favour of adapting the current domestic practice for generating market claims to comply with the T2S corporate actions standards. ⁷⁹	The German Market Practice Committee agreed to monitor the handling and processing of the "cum" flag in other T2S markets and to hold further discussions with the Ministry of Finance over whether or not to implement it after the fourth wave of migration (February 2017). German NSG to provide the ECB team, as soon as possible, with the relevant statistics on the volumes that will be affected after the six-month period following the introduction of the "record date" and, based on that, to decide whether to comply with the T2S corporate actions standards on this.

⁷⁷ See the latest update of the Impact Analysis [here](#)

⁷⁸ The CSD will instead provide its participants with an optional facility that allows them to indicate that all market claims, generated by the CSD on certain securities accounts, should have an "on hold" status. This mechanism is not in line with the T2S CA standards as explained in the related "frequently asked questions" published by the T2S Community.

⁷⁹ The German market bases this decision on its interpretation of "irrevocable instructions" (matched instructions are not considered irrevocable as they can still be bilaterally cancelled).

T2S market	T2S standard	Compliance gap	NSG-specified milestone and completion date	Status	Remark
		Payments on market claims not on T2S dedicated cash accounts and the management of securities fractions does not comply with the standards (MC standards 9, 10, 11, 14 and 15; transformations standard no 11).	August 2017.	The original deadline (March 2017) for compliance was postponed to August 2017 owing to the change in Clearstream's migration plan. Subsequently, the August 2017 deadline was postponed to the end of 2018.	The non-compliance of the German market mainly relates to German ISINs.
Belgium (Euroclear Belgium)	T2S corporate actions standards	<p>Non-generation of market claims and transformations related to fractions of securities entitlements and multiple outturns.</p> <p>Transformations for mandatory events with options not generated by the CSD.</p> <p>The CSD will not provide certain information (key dates necessary for managing buyer protection).</p>	<p>Generation of market claims on cross-CSD instructions and generation of replacement transactions for more than 99.9% of transformations: March 2017.</p> <p>Technical adaptations of Euroclear systems to fully implement CAJWG/CASG standards (Custody Service Evolution stream 6), legislative change to comply fully with the Buyer Protection standards, other measures to achieve full compliance with the T2S CA standards: Q1 2018.</p> <p>However, there is no date for full compliance with the non-generation of market claims and transformations related to fractions of securities entitlements and multiple outturns.</p>	Generation of market claims on cross-CSD instructions and generation of replacement transactions for more than 99.9% of transformations was implemented in July 2017.	
France	Restrictions on omnibus accounts	Securities must be held in two different types of securities account, according to their registration status.	No plan has been provided yet by the French market.	Implementation date still not available.	
	T2S corporate actions standards	<p>Non-generation of market claims and transformations related to fractions of securities entitlements and multiple outturns.</p> <p>Transformations for mandatory events with options not generated by the CSD.</p> <p>The CSD will not provide certain information (key dates necessary for managing buyer protection).</p>	<p>Generation of market claims on cross-CSD instructions and generation of replacement transactions for more than 99.9% of transformations: March 2017.</p> <p>Technical adaptations of Euroclear systems to fully implement CAJWG/CASG standards (Custody Service Evolution stream 6), other measures to achieve full compliance with the T2S corporate actions standards: Q1 2018.</p> <p>However, there is no date for full compliance with the non-generation of market claims and transformations related to fractions of securities entitlements and multiple outturns.</p>	Generation of market claims on cross-CSD instructions and generation of replacement transactions for more than 99.9% of transformations was implemented in July 2017.	
Netherlands	T2S corporate actions standards	<p>Non-generation of market claims on cross-CSD instructions and those related to fractions of securities entitlements.</p> <p>Transformations will be detected but not generated by the CSD.</p> <p>Non-compliance with the buyer protection standards for centrally cleared transactions: planned for Q1 2017.</p>	<p>Generation of market claims on cross-CSD instructions, generation of replacement transactions for more than 99.9% of transformation and full compliance with Buyer Protection standards: 31 March 2017.</p> <p>Technical adaptations of Euroclear systems to fully implement CAJWG/CASG standards (Custody Service Evolution stream 6), other measures to reach full compliance with the T2S corporate actions standards: Q1 2018.</p> <p>However, there is no date for full compliance with the non-generation of market claims and transformations related to fractions of securities entitlements and multiple outturns.</p>	<p>Generation of market claims on cross-CSD instructions and generation of replacement transactions for more than 99.9% of transformations was implemented in July 2017.</p> <p>Full compliance with the BP standards as of July 2017.</p>	The Dutch market already complies with Buyer Protection standards for OTC transactions: compliance for centrally cleared transactions planned for Q1 2017.

T2S market	T2S standard	Compliance gap	NSG-specified milestone and completion date	Status	Remark
Slovakia (CDCP)	T2S matching fields	In the CSD's legacy matching engine, when processing transactions in securities held in co-ownership, the Slovakian market uses two matching fields in addition to those described in the UDFS.	No plans for compliance.	No implementation plan is available.	This case of non-compliance is estimated to have a low overall impact on the T2S Community.
	T2S corporate actions standards	Non-compliance with transformations standards related to managing fractions and multiple outturns, which currently are not generated by the Slovakian CSD	The Slovakian market plans to become fully compliant with the transformations standards by the end of March 2018.		
Slovakia (NCDCP)	T2S matching fields	In the CSD's legacy matching engine, when processing transactions in securities held in co-ownership, the Slovakian market uses two matching fields in addition to those described in the UDFS.	No plans for compliance.	No implementation plan available.	This case of non-compliance is estimated to have a low overall impact on the T2S Community.
	T2S corporate actions standards	Non-compliance with transformations standards related, which are currently not generated by the Slovakian CSD (NCDCP)	The Slovakian market (NCDCP) plans to become fully compliant with the transformations standards by the end of June 2018.		
Spain	T2S matching fields	Non-compliance stems from the fact that for intra-CSD settlements in equities the Spanish market has decided to complete the optional matching field "Client of the counterparty" with the end-investor information and not with the counterparty of the CSD participant.	No plan has been provided by the market		
Denmark	T2S corporate actions standards	Non-compliance with: a) market claim standard 10, where market claims are not generated for transactions in securities serviced in Danish Kroner (DKK), which are settled on T2S. b) market claim standard 14 where the correct tax rate is not applied for market claims on some securities, which are issued in other CSDs	No plan has been provided by the market		
Luxembourg (LuxCSD)	T2S corporate actions standards	Non-compliance with: a) market claims standards 19 and 23; b) all the transformations standards.	LuxCSD plans to comply with: - MC standard 23 in Q1 2018; - transformations standards 2 and 3 in Nov 2017; - all transformations standards in Feb 2018.	LuxCSD confirmed compliance with MC 19 in November 2017.	

T2S market	T2S standard	Compliance gap	NSG-specified milestone and completion date	Status	Remark
Hungary	T2S corporate actions standards	<p>The Hungarian market will not detect and generate market claims on equities after its migration to T2S in February 2017.</p> <p>In addition, the Hungarian market will opt out by default from market claims and transformations for intra-CSD settlements (something that KEELER participants can change on a transaction by transaction basis) until it implements its new system for A2A communication with T2S.</p>	<p>Plan for compliance with default generation of CAs on flow:</p> <ul style="list-style-type: none"> -the introduction of KEELER's A2A system by 03/07/2017; - a plan for compliance with market claims on equities by end 2017. 	The Hungarian market has delayed the launch of its A2A platform as planned, as well as its full compliance with T2S CA standards for equities by end 2017. No new date has been provided yet.	
	T2S matching fields	<p>After migration to T2S, the Hungarian CSD (KEELER) will not comply fully with the T2S standard on matching fields for intra-CSD settlements, which will be matched in its own system and then sent to T2S as already matched.</p>	<p>This will be resolved by the introduction of KEELER's A2A system by 03/07/2017.</p>	The Hungarian market has delayed the launch of its A2A platform. No new date has been provided yet.	Directly connected parties and cross-CSD settlements are not affected by this non-compliance.

Annex 4

Detailed monitoring information per T2S market

T2S harmonisation activities: Austria

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	No barriers identified for achieving full compliance before migration to T2S.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	No barriers identified for achieving full compliance before migration to T2S.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey May 2013. Registration information is not transferred via settlement messages
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey May 2013. Tax information is not transferred via settlement messages
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AML-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	89%	R-?	Major technical changes/ Market practice changes	Not available	Not available	CANIG and T2S NUG (CSD/ CCP, banks and Issuers)	Info source : Sep 2017 CASG gap analysis update and further NUG clarification. The AT market does not comply with MC standards 6 and 7 (related to treatment of ex/cum and opt-out indicators) as well as MC standards 19 and 23 as no user friendly facility is provided to control the interdependence of the settlement of the market claim with the underlying transaction.
	Transformations (13 standards)	100%						
	Buyer protection (18 standards)	100%						
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input. Only bilateral cancellations are possible after matching status
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input. Market already complies with the standard.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2013 HSG survey and bilateral input. Fully compliant with omnibus accounts availability.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2013 HSG survey and bilateral input. No restrictions on omnibus accounts.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S securities account numbering, April-May 2013 and Q3 2013 CSD status gathering template
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S DCA numbering, April- May 201. Bilateral exchanges with NUG.
Priority 2								
18. Corporate actions	CA market standards (68)	87%	G	Straight-forward to implement	N/A	Project set up for 2018	Austrian Corporate Actions National Implementation Group (CANIG)	Info source: BSG/E-MIG Survey (2017). The EMIG provided statistics are based on the 129 CAJWG prioritised standards.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. Full compliance with European market practice

T2S harmonisation activities: Belgium (Euroclear)

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2, White Paper and bilateral input. Matching rules that will apply are those of the T2S platform. Full compliance for testing
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: May 2013 HSG survey. Registration information is not transferred via settlement messages.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: May 2013 HSG survey. Tax information is not transferred via settlement messages.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	96%	R- Mar 2018	Major technical change	Q4 – 2017	March 2018	Euroclear	Info source: Sep 2017 CASG gap analysis report and further NUG clarification. Euroclear Belgium does not comply fully with market claims standards (3 and 11), transformations standards (non-generation of the transformed instructions) and buyer protection standards following its migration to T2S in September 2016. Full compliance with all T2S CA Standards, including change in Belgian securities law in order to comply with BP standards, is planned for Q1 2018.
	Transformations (13 standards)	0%		Major technical change				
	Buyer protection (18 standards)	0%		Other				
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SF1 standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input. EoC (BE) already complies with only bilateral cancellation after matching status.
	9. Settlement Finality III: irrevocability of securities transfers	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input. Terms and conditions will be updated to implement SFIII in T2S. This update will have to be presented and approved, where applicable, by the Belgian regulator (Nationale Bank an België/Banque Nationale de Belgique). No barriers identified in this process.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date if standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. There are no issues with omnibus accounts availability for the ESES countries.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. No restrictions on usage of omnibus accounts.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S securities account numbering, May 2013. No barriers identified.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S DCA numbering, April-May 2013 and bilateral input from BE NUG. No barriers identified.
Priority 2								
18. Corporate actions	CA market standards (68)	88%	G	Market practice change	N/A	Q1 2018	Euroclear	Info source: BSG/E-MIG Survey (Nov 2017). The EMIG provided statistics are based on the 129 CAJWG prioritised standards. Final implementation expected with Euroclear launch of Stream 6 in February 2018
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.

T2S harmonisation activities: Belgium (NBB-SSS)

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: BE NUG input.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: NUG confirmation that the market is now fully operational according to the T2S standards following implementation of the new technical platform.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2013. Registration process is paper-based. No need to include registration info in settlement messages.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2013. No additional information is requested in settlement messages for tax processing.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Sep 2017 CASG gap analysis update. NBB-SSS complies fully with the T2S CA standards relevant for the securities it serves.
	Transformations (13 standards)			N/A				
	Buyer protection (18 standards)			N/A				
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: NUG confirmation
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: NUG confirmation that the market is now fully operational according to the T2S standards following the implementation of the new technical platform in February 2015.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
12. Settlement cycles	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing. No regulatory barrier for outsourcing of settlement services by the CSD to the Eurosystem.
		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. NBB-SSS offers omnibus accounts.
	14. Restrictions on omnibus accounts	Fully compliant	B	Market practice change	N/A	N/A	NBB-SSS	Info source: NBB-SSS. Compliant since June 2017.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: NUG confirmation that the market is now fully operational according to the T2S standards following the implementation of the new technical platform in February 2015.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S DCA numbering, April-May 2013.
Priority 2								
18. Corporate actions	CA market standards (44)	96%	G	Other	Testing readiness achieved	Mid 2017	NBB – SSS	Info source: BSG/E-MIG Survey (Nov 2017).
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. NBB-SSS is in line with European market practice.

T2S harmonisation activities: Switzerland (SIX SIS)

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1 T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	2 T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards) Transformations (13 standards) Buyer protection (18 standards)	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Sep 2017 CASG gap analysis update. As per the Sep 2017 CASG gap analysis update a grace period for achieving compliance with Transformation Standard 3 was granted due to the identified room for diverging implementation interpretations. The grace period applies provided that the market achieves full compliance prior to the next 2018 CASG gap analysis update.
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	16. Dedicated cash account numbering	N/A	N/A	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
Priority 2								
18. Corporate actions	CA market standards (68)	98%	G	N/A	N/A	Final implementation date not available.	SIS	Info source: BSG/E-MIG Survey (Nov 2017). The EMIG provided statistics are based on the 129 CAJWG prioritised standards.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.

T2S harmonisation activities: Germany

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used for transmission of registration information.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used for transmission of tax information.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	63%	R-?	Legislative change	Testing readiness achieved	Not available	CBF / national authorities / SWIFT format: DESSUG	Info source: Sept 2017 CASG gap analysis update and NUG confirmation/clarifications. Market practice change effective since 1 January 2017: Record date was successfully introduced prior to DE market migration to T2S (February 2017). Some Funds do not comply with CASG standards and do not follow the sequence of days, hence the CSD must operate these fund income distributions with ex-day processing. CBF could not keep the announced implementation date of August 2017 for the remaining standards with high impact on the T2S Community (payment on T2S DCA accounts) and decided for a two-step approach, current estimated for November 2018. The German market does not yet have a plan to eventually comply with the two remaining standards ("CUM" flag and generating of MCs independently of settlement of the underlying transaction). Regarding the CUM flag, it may only elaborate such plans having monitored handling and processing in other T2S markets and only after approval by the respective authorities.
	Transformations (13 standards)	100%		Legislative change		-For high impact standards: November 2018		
	Buyer protection (18 standards)	94%		Market practice change		-For low impact standards: no current plan		
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S settlement finality rule III.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S securities account numbering, April-May 2013. No barriers identified.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source:confirmation from the DE NUG.
Priority 2								
18. Corporate actions	CA market standards (68)	Not compliant	R-No Info	N/A	Not available	Not available	N/A	Info source: BSG/E-MIG Survey (Nov 2017). The EMIG provided statistics not updated, still based on the 129 CAJWG prioritised standards.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.

T2S harmonisation activities: Denmark

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input. VP is planning to fully comply with the relevant T2S standard by its migration to T2S.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input. VP is planning to fully comply with the relevant T2S standard by its migration to T2S.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Registration information is not part of the settlement instruction.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Tax information is directly associated with the account, hence no need to transfer the details in settlement message.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	93%	R-?	Major technical change	Testing readiness achieved	Not Available	VP and DK NSG	Info source: Sep 2017 CASG gap analysis update. Cases of non-compliance with Market Claim Standard 10 (i.e. market claims are not generated for trades settled in T2S in which a CA-event occurs involving a non-T2S settlement currency) and Standard 14 (i.e. Danish taxation rates are, for current market practice reasons, applied for a small number of ISINs, issued in a non-T2S CSD) after VP's migration to T2S in September 2016 . VP's status has been downgraded from Green to Red.
	Transformations (13 standards)	100%		Major technical change				
	Buyer protection (18 standards)	100%		Major technical change				
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SF I standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input. Full compliance with T2S SF II rule.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input from the DK NUG.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral discussions.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral discussions.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S securities account numbering, April-May 2013.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the Danish NUG.
Priority 2								
18. Corporate actions	CA market standards (68)	87%	G	Market Practice Change	Testing readiness achieved	Oct 2018	VP and Danish NUG	Info source: BSG/E-MIG Survey (Nov 2017).
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral discussions.

T2S harmonisation activities: Estonia

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: NSG input. Compliance achieved with migration to T2S.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: NSG input. Compliance achieved with migration to T2S.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: NSG input. Compliance achieved with migration to T2S.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: NSG input. Compliance achieved with migration to T2S.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards) Transformations (13 standards) Buyer protection (18 standards)	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: Sep 2017 CASG gap analysis update and bilateral input.
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input. The local settlement system supports the same cancellation principles as T2S. Matched instruction demands cancellation instructions from both counterparties.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: NSG input. Compliance achieved with migration to T2S.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date if standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. validation/rejection.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: NSG input. Compliance achieved with migration to T2S.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: NSG input. Compliance achieved with migration to T2S.
Priority 2								
18. Corporate actions	CA market standards (68)	94%	G	N/A	N/A	No date provided	NUG/MIG	Info source: BSG/E-MIG Survey (Nov 2017). The EMIG provided statistics are based on the 129 CAJWG prioritised standards.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.

T2S harmonisation activities: Spain (IBERCLEAR)

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: NSG input. Full compliance achieved with migration to T2S.
	2. T2S matching fields	Not compliant	R-?	Market practice changes	Not available	Not available	Iberclear	Info source: SP2 and bilateral input. The T2S matching field "Client of the CSD participant" is used in order to handle end-investor information for intra-CSD transactions on equities
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: ES NSG.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used to transfer tax information.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Sep 2017 CASG gap analysis update. As per the Sep 2017 CASG gap analysis update a grace period for achieving compliance with Transformation Standard 3 was granted due to the identified room for diverging implementation interpretations. The grace period applies provided that the market achieves full compliance prior to the next 2018 CASG gap analysis update.
	Transformations (13 standards)							
	Buyer protection (18 standards)							
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGs surveys 2011 and 2012, SP2 and bilateral input. No need for any changes for compliance with T2S SF II rule
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input. No need for any changes for compliance with T2S SF III rule.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on settlement cycle and bilateral exchanges. Spanish fixed income securities markets (public and private debt) migrated to T+2 on 06/10/2014. Spanish Stock Exchange transactions (mainly equities) migrated to T+2 on 03/10/2016 achieving full compliance.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. Full compliance in place.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. Full compliance in place.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: NSG input. Full compliance achieved with migration to T2S.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S DCA numbering, April-May 2013. Full compliance in place.
Priority 2								
18. Corporate actions	CA market standards (68)	92%	G	N/A	N/A	No date provided	Iberclear	Info source: BSG/E-MIG Survey (Nov 2017). The EMIG provided statistics are based on the 129 CAJWG prioritised standards.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGs survey and bilateral input.

T2S harmonisation activities: France

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used for registration process.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used for sending tax-related information.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	96%	R- Mar 2018	Major technical change	Q4 – 2017	March 2018	FR – MIG	Info source: Sep 2017 CASG gap analysis report and further NUG clarification. Euroclear France does not fully comply with market claims standards (3 and 11), transformations standards (non-generation of the transformed instructions) and buyer protection standards following its migration to T2S in September 2016. Full compliance with all T2S CA Standards is planned on 19 March 2018 with the go-live of Custody Service Enhancements 6 (CSE6).
	Transformations (13 standards)	0%		Major technical change				
	Buyer protection (18 standards)	0%		Other				
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input. EoC already complies with T2S SFII rule (bilateral cancellation).
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. Full compliance with omnibus account availability in France.
	14. Restrictions on omnibus accounts	Not compliant	R – ?	Legal and Market practice change/Regulation	Not available	Not available	National legislator	Info source: EoC FR. Euroclear FR requires participants to maintain two omnibus accounts based on type of securities holdings per one ISIN (registered and non-registered securities). Investor CSDs and their participants are forced to propagate this segregation throughout the custody chain. Since the implementation of T2S, Investor CSDs holding such securities need now also to propagate this segregation to the securities accounts of their participants, in order to allow T2S platform to technically perform the cross CSD realignment
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S securities account numbering, April-May 2013. French market plans for full compliance prior to migration to T2S.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: FR NUG
Priority 2								
18. Corporate actions	CA market standards (68)	84%	G	Market practice change	N/A	Q1 2018	Euroclear	Info source: BSG/E-MIG Survey (Nov 2017). Final implementation expected with Euroclear launch of Stream 6 on 19 March 2018. The EMIG provided statistics are based on the 129 CAJWG prioritised standards.
23. Securities amount static data		Not compliant	R	N/A	N/A	Newly issued convertible bonds will be issued in FAMT. Newly issued securitisation mutual funds will be denominated in FAMT at a later date.	N/A	Info source: T2S NUG. There are debt securities denominated in UNIT in the French market, securities issued by securitisation mutual funds as well as convertible bonds. These limited cases of non-compliance relate to a technical constraint in the CSD system that would not allow decimalisation on these debt instruments. For newly issued securities, Euroclear has confirmed that the technical constraint preventing decimalisation no longer exists for convertible bonds (the vast majority of non-compliant securities), but remains for securities issued by securitisation mutual funds. The volumes are low (less than 2% of the ISINs related to debt instruments), and will be decreasing as the French market has started to denominate all newly issued convertible bonds in FAMT (convertibles represented the vast majority of non-compliant securities). New issues of securitisation mutual funds will be denominated in FAMT at a later date when a new asset servicing motor (TCS BaNCS) is implemented in Euroclear France to manage these securities.

T2S harmonisation activities: Greece (BOGS)

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: GR NUG. T2S ISO messages in operation.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: GR NUG. T2S matching fields in operation.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: GR NUG. No registration information relevant for BOGS ISINs.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: GR NUG. No tax info in T2S messages.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards) Transformations (13 standards) Buyer protection (18 standards)	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: GR NUG. Full compliance with all relevant T2S CA standards (sovereign debt securities).
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: GR NUG. BOGs rules in line with T2S SF II.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: GR NUG. BOGs rules in line with T2S SF III.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: GR NUG, 2014 HSG survey on IT outsourcing.
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: GR NUG. Fully compliant since 6 October 2014.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date if standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: GR NUG. Full compliance with omnibus account availability.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: GR NUG. No restrictions on the use of omnibus accounts.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: GR NUG. HSG survey on T2S securities account numbering, April-May 2013.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: GR NUG.
Priority 2								
18. Corporate actions	CA market standards (23)	100%	B	N/A	N/A	N/A	N/A	Info source: BSG/E-MIG Survey (Nov 2016). The EMIG provided statistics are based on the 129 CAJWG prioritised standards.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: GR NUG.

T2S harmonisation activities: Hungary

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	N/A	N/A	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input. KELER is connected to T2S in U2A mode.
	2. T2S matching fields	Not compliant	R-?	Major technical change	Not available	Not available	KELER	Info source: SP2 and bilateral input. Full plan and implementation dates for full compliance to be confirmed by KELER. The non-compliance is limited to intra-CSD settlements, where KELER will continue to follow its current matching practices in its legacy platform before sending the instructions to T2S in an already matched status. However, due to the Hungarian market's set-up in T2S, in which only against payment instructions in euro will be migrated to T2S, the non-compliance is relevant only for this subset of transactions.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used for passing on registration information.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used for passing on tax-related information
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	18%	R-?	Regulatory/legislative/technical change	Not available	Not available	KELER, regulator, NUG	Info source: Sep 2017 CASG gap analysis update. The Hungarian market does not generate market claims for equities after its migration to T2S in February 2017 and initially will use default opt-out of market claims and transformation. Compliance with the standard on opt-out indicator is planned to be achieved with the launch of its A2A platform and generation of market claims for equities is planned by the end of 2017.
	Transformations (13 standards)	92%	R-?	Major technical/ market practice and legal change				
	Buyer protection (18 standards)	100%	R-?	Market practice and legal change				
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input and NUG response.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. No barriers identified.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGs survey and bilateral input. No barriers identified.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S securities account numbering, April-May 2013.
	16. Dedicated cash account numbering	N/A	N/A	N/A	N/A	N/A	N/A	At the moment, the Hungarian NCB does not plan to open DCAs in T2S
Priority 2								
18. Corporate actions	CA market standards (68)	34%	R	Technical change and market practice change for some standards	Not available	Not available	KELER	Info source: BSG/E-MIG Survey (Nov 2017). The EMIG provided statistics are based on the 129 CAJWG prioritised standards.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUGs survey and bilateral input. Full compliance with the EU standard.

T2S harmonisation activities: Italy

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: IT NUG. T2S ISO messages in operation.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: IT NUG. T2S matching fields in operation.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages do not contain any registration information.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013 and bilateral input. Settlement messages do not contain any tax-related information.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Sep 2017 CASG gap analysis update. As per the Sep 2017 CASG gap analysis update a grace period for achieving compliance with Transformation Standard 3 was granted due to the identified room for diverging implementation interpretations. The grace period applies provided that the market achieves full compliance prior to the next 2018 CASG gap analysis update.
	Transformations (13 standards)							
	Buyer protection (18 standards)							
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability of transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input. Fully compliant with T2S SF II rule.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: IT NUG. Full compliance with T2S SFIII rule.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date if standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. No barriers identified.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. No barriers identified.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: IT NUG confirmation on compliance with the standard.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S DCA numbering, April-May 2013. Bdl already complies fully with T2S standard.
Priority 2								
18. Corporate actions	CA market standards (68)	95%	G	N/A	N/A	No date provided	N/A	Info source: BSG/E-MIG Survey (Nov 2017). The EMIG provided statistics are based on the 129 CAJWG prioritised standards.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. IT market complies fully with the EU standard.

T2S harmonisation activities: Lithuania

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from the NUG. Settlement messages are not used to transmit registration information.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used to transmit tax-related information
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: Sep 2017 CASG gap analysis update and bilateral input.
	Transformations (13 standards)							
	Buyer protection (18 standards)							
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input and NUG Chairperson's response.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input and NUG Chairperson's response. New draft CSD rules were submitted for regulatory approval at the beginning of 2016. No legal/regulatory barriers identified.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. No barriers identified.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. No barriers identified.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S securities account numbering, April-May 2013.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S DCA numbering,
Priority 2								
18. Corporate actions	CA market standards (68)	97%	G	Legal barrier, Market practice change and changes in CSD rules and regulations	Testing readiness will be achieved in Q2 2017	18-Sep-17	LCVPD	Info source: BSG/E-MIG Survey (Nov 2017). The EMIG provided statistics are based on the 129 CAJWG prioritised standards.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. Fully compliant with the T2S standard.

T2S harmonisation activities: LUX CSD

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Registration information is not transferred via settlement messages.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Tax information is not transferred via settlement messages.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	93%	R - March 2018	Straight-forward to implement	N/A	March 2018	LUX CSD	Info source: Sep 2017 CASG gap analysis update and additional information provided by the LU NUG. Compliance with more than half of the MC standards has been achieved. However, compliance with market claims standards 19 and 23 has not been achieved by the time of the LuxCSD migration to T2S due to the chosen way to process market claims, i.e. market claims are detected as required but are generated and sent for settlement only after the settlement of the underlying transaction.
	Transformations (13 standards)	0%		Straight-forward to implement				
	Buyer protection (18 standards)	100%		Straight-forward to implement				
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input. Lux CSD will follow CBF instruction cancellation process.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Survey on T2S settlement finality rule III and NUG response. SFIII is ensured via provisions in Luxembourg public law.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A		Info source: 2014 HSG survey on IT outsourcing.
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S securities account numbering, April-May 2013
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey on compliance with T2S harmonisation standards, May 2016 and bilateral input from LU NUG.
Priority 2								
18. Corporate actions	CA market standards (68)	95%	G	Other	Not available	Not available	ABBL	Info source: BSG/E-MIG Survey (Nov 2017).
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.

T2S harmonisation activities: VP LUX

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: LU NUG bilateral input.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: LU NUG bilateral input.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Registration information is not part of the instruction and information about registration is taken directly from the accounts.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Tax information is directly associated with the account, hence no need to transfer the details in settlement message.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Sep 2017 CASG gap analysis update.
	Transformations (13 standards)							
	Buyer protection (18 standards)							
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input. Full compliance with bilateral cancellation after matching.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Survey on T2S settlement finality rule III and NUG response. SFIII is ensured via provisions in Luxembourg public law.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.
T2S accounts numbering	15. Securities account numbering	Not compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S securities account numbering, April-May 2013. System changes are required.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey on compliance with T2S harmonisation standards, May 2016. BCL has fully complied since migration wave 1.
Priority 2								
18. Corporate actions	CA market standards (68)	95%	G	Other	Not available	Not available	ABBL	Info source: BSG/E-MIG Survey (Nov 2017).
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.

T2S harmonisation activities: Latvia

Activity	Sub-activity	Compliance Indicates level of compliance with the relevant standards/rules	Status Green (G), yellow (Y), red (R), blue (B)	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
				If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Source: bilateral input and quarterly self assessment. Latvian CSD plans to comply fully by migration date.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Source: XMAP Survey 2015 and further bilateral clarification from the NUG on adaptation of initial register transactions according to T2S matching specifications.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Source: bilateral input. Registration information is not passed on through settlement messages.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Source: bilateral input. Tax-related information is not passed on through settlement messages.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards) Transformations (13 standards) Buyer protection (18 standards)	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: Sep 2017 CASG gap analysis update and bilateral input.
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Source: LV NUG.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Source: LV NUG.

Activity	Sub-activity	Compliance Indicates level of compliance with the relevant standards/rules	Status Green (G), yellow (Y), red (R), blue (B)	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
				If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: LV NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Source: LV NUG.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Source: LV NUG. There are no restrictions rules regarding omnibus accounts in the Latvian CSD.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Source: LV NUG.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Source: LV NUG.
Priority 2								
18. Corporate actions	CA market standards (68)	81%	G	Major technical change	Q2 2017	18-Sep-17	Latvia CSD	Info source: BSG/E-MIG Survey (Nov 2017).The EMIG provided statistics are based on the 129 CAJWG prioritised standards.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Source: LV NUG.

T2S harmonisation activities: Malta

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: MT NUG. T2S ISO messages in operation.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: MT NUG. T2S matching fields in operation.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: MT NUG. No registration info in T2S messages.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: MT NUG. No tax info in T2S messages.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Sep 2017 CASG gap analysis update.
	Transformations (13 standards)			N/A				
	Buyer protection (18 standards)			N/A				
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	NA	NA	N/A	Info source: MT NUG. CSD rules in line with T2S SF II.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	NA	NA	N/A	Info source: MT NUG. CSD rules in line with T2S SF III.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: MT NUG. Fully compliant since 6 October 2014.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: MT NUG. Full compliance with omnibus account availability.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: MT NUG. No restrictions on the use of omnibus accounts.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: MT NUG. Confirmation from the NUG received post-migration to T2S.
Priority 2								
18. Corporate actions	CA market standards (68)	74%	G	Other	Not available	Not available	MSE	Info source: BSG/E-MIG Survey (Nov 2017).The EMIG provided statistics are based on the 129 CAJWG prioritised standards.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.

T2S harmonisation activities: the Netherlands

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input. Plans and dates for full compliance have been provided.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input. Plans and dates for full compliance have been provided.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. There are no registered securities in the Netherlands. Registration information is not transmitted via settlement messages.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used to transmit tax-related information.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	96%	R- March 2018	Major technical change	Q4 – 2017	March 2018	NL-MIG	Info source: Sep 2017 CASG gap analysis report and further NUG clarification. Euroclear Netherlands does not fully comply with market claims standards (3 and 11) and transformations standards (non-generation of the transformed instructions). Full compliance with all T2S CA Standards is planned for 19 March 2018 with the go-live of Custody Service Enhancements 6 (CSE6) . TRANSFORMATION: Cancellation and replacement of the underlying intra-CSD instructions was implemented in March 2017 (although for mandatory events without options only). This results in a substantial degree (>>0%) of compliance. As the new approach is "all (blue) or nothing (red) ", the code for this sub-activity remains "red": the comments should reflect this progress.
	Transformations (13 standards)	0%		Major technical change				
	Buyer protection (18 standards)	100%		Other				
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input. EoC ESES already complies with bilateral cancellation after matching.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S securities account numbering, April-May 2013. T2S NUG survey and bilateral input.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: List of cash and securities side DCPs as published by DCPG and further confirmation from the NL NUG
Priority 2								
18. Corporate actions	CA market standards (68)	91%	G	Major technical change and market practice change	N/A	Q1 2018	Euroclear	Info source: BSG/E-MIG Survey (Nov 2017).The EMIG provided statistics are based on the 129 CAJWG prioritised standards. Final implementation expected with Euroclear launch of Stream 6 on 19 March 2018.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.

T2S harmonisation activities: Portugal (Interbolsa)

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input and quarterly status gathering templates.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input and quarterly status gathering templates.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. No registration details are sent via settlement instructions.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013 and further bilateral clarifications. Tax-related information is not passed on when sending settlement instructions.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Sep 2017 CASG gap analysis update. As per the Sep 2017 CASG gap analysis update a grace period for achieving compliance with Transformation Standard 3 was granted due to the identified room for diverging implementation interpretations. The grace period applies provided that the market achieves full compliance prior to the next 2018 CASG gap analysis update.
	Transformations (13 standards)							
	Buyer protection (18 standards)							
Legal harmonisation	7. Settlement finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: PT NUG. Full compliance with T2S SF II rule.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: PT NUG. Full compliance with T2S SF III rule.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. Omnibus accounts are available.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG discussions (Feb 2015). There are no restrictions on the omnibus accounts that need to be propagated down the settlement chain.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S securities account numbering, April-May 2013.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S DCA numbering, April-May 2013.
Priority 2								
18. Corporate actions	CA market standards (68)	Not compliant	R-No Info	N/A	Not available	Not available	N/A	Info source: BSG/E-MIG Survey (Nov 2017). The EMIG provided statistics not updated, still based on the 129 CAJWG prioritised standards.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG. Full compliance following migration.

T2S harmonisation activities: Romania

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: NUG and bilateral exchanges. A2A connectivity mode reached on 17 January 2017.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards) Transformations (13 standards) Buyer protection (18 standards)	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Sep 2017 CASG gap analysis update. As per the Sep 2017 CASG gap analysis update a grace period for achieving compliance with Transformation Standard 3 was granted due to the identified room for diverging implementation interpretations. The grace period applies provided that the market achieves full compliance prior to the next 2018 CASG gap analysis update.
Legal harmonisation	7. Settlement Finality I: moment of entry	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Confirmation from the NUG received post-migration to T2S.
Priority 2								
18. Corporate actions	CA market standards (68)	88%	G	Market practice as well as regulatory changes	Testing readiness achieved	No fixed date provided	CSD, Regulator, NCB	Info source: BSG/E-MIG Survey (Nov 2017).The EMIG provided statistics are based on the 129 CAJWG prioritised standards.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input. No issues with securities amount data in Romania.

T2S harmonisation activities: Slovenia

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and bilateral input.
	2. T2S matching fields	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG bilateral input.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used for transmission of registration information.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used for transmission of tax information.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AML-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Sep 2017 CASG gap analysis update.
	Transformations (13 standards)							
	Buyer protection (18 standards)							
Legal harmonisation	7. Settlement Finality I: moment of entry	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2, status gathering templates Q2 2013 and bilateral input.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG surveys 2011 and 2012, SP2, status gathering templates Q2 2013 and bilateral input.
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing.

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date if standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S securities account numbering, April-May 2013, Q2 2013 status gathering template.
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S DCA numbering, April-May 2013.
Priority 2								
18. Corporate actions	CA market standards (68)	100%	B	N/A	N/A	N/A	KDD/national legislators and regulators	Info source: BSG/E-MIG Survey (Nov 2017).The EMIG provided statistics are based on the 129 CAJWG prioritised standards.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Q2 2013 status gathering template.

T2S harmonisation activities: Slovakia

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: SP2 and T2S NUG bilateral input.
	2. T2S matching fields	Not compliant	R-?	Market practice change	Not available	Not available	CDCP	Info source: XMAP survey 2015. Transaction code is a mandatory matching field in order to prevent incorrect intra-CSD matching of e.g. ordinary OTC trade with securities transfer stemming from inheritance, matching of instruction with available securities with instruction with pledged securities, etc. This is applicable to all transactions matched in the legacy system, since it is a mandatory matching field. The impact of non-compliance of the SK market to the rest of the T2S community was assessed by the MIB in March 2016 as low. There are ongoing discussions in the SK market to define a plan in order to achieve full compliance.
	3. Interaction for registration	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013.
	4. Interaction for tax info	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S HSG surveys 2013. Settlement messages are not used for transmission of tax information.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	100%	R-March 2018	Major technical changes	N/A	March 2018	N/A	Info source: Sep 2017 CASG gap analysis update and bilateral input from SK NUG. Major technical changes for Transformation standards 9 and 11 are required in CDCP settlement system. These changes will be implemented by the end of March 2018.
	Transformations (13 standards)	85%						
	Buyer protection (18 standards)	100%						
Legal harmonisation	7. Settlement Finality I: moment of entry	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Status gathering templates and T2S NUG

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify what the type of gap is	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
	9. Settlement Finality III: irrevocability of securities transfers.	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Status gathering templates and T2S NUG
	10. Outsourcing IT (Settlement) services	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: 2014 HSG survey on IT outsourcing. With the CSDR now being law, no barriers to outsourcing to public entities remain.
12. Settlement cycles		Fully compliant	B	N/A	N/A	N/A	N/A	Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014.
CSD account structures	13. Availability of omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG survey and bilateral input.
	14. Restrictions on omnibus accounts	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: T2S NUG bilateral input
T2S accounts numbering	15. Securities account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S securities account numbering, April-May 2013
	16. Dedicated cash account numbering	Fully compliant	B	N/A	N/A	N/A	N/A	Info source: HSG survey on T2S DCA numbering, April-May 2013. NCB plans full compliance. Dates are provided.
Priority 2								
18. Corporate actions	CA market standards (68)	Not compliant	R	Changes in the CSD rules, market practice changes and IT changes	Not available	Not available	SK market, CDCP, regulators (approval of amended CDCP rules)	Info source: No data received in Nov 2017.
23. Securities amount static data		Fully compliant	B	N/A	N/A	N/A	CDCP	Info source: T2S NUG input. Legislative change has already taken place.

T2S harmonisation activities: Slovakia (NCDPCP)

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify the type of the gap	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
Priority 1								
T2S messages	1. T2S ISO 20022 messages	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: SK NSG.
	2. T2S matching fields	Not Compliant	R-?	Market practice	Not available	Not available	N/A	Info source: SK NSG, ongoing non-compliance impact assessment
	3. Interaction for registration	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: SK NSG.
	4. Interaction for tax info	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: SK NSG.
5. T2S schedule of settlement day		N/A	Blank	N/A	N/A	N/A	N/A	In line with the T2S community needs, the AMI-SeCo supported the adaptation of the T2S calendar as of 2019 based on the principle that T2S should be open when any of the T2S settlement currency RTGS are open. As the Danish Kroner will join the euro as the second T2S settlement currency in October 2018 this will mean that T2S will be closed on Good Friday and Easter Monday but open on 1 May as of 2019. Compliance by T2S markets with the standard on the T2S calendar is to be reassessed once the new T2S calendar is implemented.
6. Corporate actions T2S CA standards (59)	Market claims (28 standards)	Not Compliant	R-?	Market practice	Not available	Not available	N/A	Info source: SK NSG, ongoing non-compliance impact assessment
	Transformations (13 standards)	Not Compliant						
	Buyer protection (18 standards)	Not Compliant						
Legal harmonisation	7. Settlement Finality I: moment of entry	Fully Compliant	B	Straight-forward to implement	N/A	N/A	CSD	Info source: T2S NUG – Settlement Finality Questionnaire. Full compliance with the T2S SFI standard expected by Q4 2017, provided that the relevant prerequisites foreseen in the T2S collective agreement are met.
	8. Settlement Finality II: irrevocability and enforceability transfer order	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: SK NSG.
	9. Settlement Finality III: irrevocability of securities transfers.	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: SK NSG.
	10. Outsourcing IT (Settlement) services	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: CSDR (2014), AG agreed to assign a blue compliance status to all T2S markets and thus to the harmonization activity itself – no obstacles were defined
12. Settlement cycles		Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: SK NSG. Compliant since 6 October 2014

Activity	Sub-activity	Compliance	Status	Type of implementation gap	Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.		Implementation actor(s)	Further comments
		Indicates level of compliance with the relevant standards/rules	Green (G), yellow (Y), red (R), blue (B)	If the standards/rules are not yet implemented, please specify the type of the gap	Ready for T2S testing	Fully operational according to the T2S standard	Relevant national actors for implementation	
CSD account structures	13. Availability of omnibus accounts	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: SK NSG.
	14. Restrictions on omnibus accounts	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: SK NSG.
T2S accounts numbering	15. Securities account numbering	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: SK NSG.
	16. Dedicated cash account numbering	Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: SK NSG.
Priority 2								
18. Corporate actions	CA market standards (68)	Not Compliant	R	Market practice	Not available	Not available	SK capital market and its participants, NCDCP	Info source: No data received in Nov 2017.
23. Securities amount static data		Fully Compliant	B	N/A	N/A	N/A	N/A	Info source: SK NSG. Legislative change has already taken place.

Annex 5

List of members of the Advisory Group on Market Infrastructures for Securities and Collateral

The Advisory Group on Market Infrastructures for Securities and Collateral provides advice to the Eurosystem on T2S-related issues, to ensure that T2S is developed and implemented in line with market needs. To this end, the AMI-SeCo is made up of representatives from all stakeholders, i.e. financial market infrastructures including CSDs participating in T2S, users and national central banks. The AMI-SeCo acts as an advisory body for the Eurosystem for all issues related to T2S.

With regard to harmonisation matters, the AMI-SeCo is supported by the HSG.

The AMI-SeCo's mandate is available on the ECB website⁸⁰. The group's meeting documents can also be downloaded from the website. The list of members as of 19 October 2017 is shown below.

Institution	Name
Chair and Secretary	
European Central Bank	Marc Bayle de Jessé (<i>Chairperson</i>)
European Central Bank	Karine Themeijan (<i>Secretary</i>)
Users	
Banco Santander	Marcos Santos Centenera
Bank of America Merrill Lynch	John Whelan
BBVA	Fernando García Rojo
BNP Paribas	Alain Pochet
BNY Mellon	Gesa Benda
CACEIS	Eric Derobert
CASG Chair	James Cunningham (BNY Mellon)
CECA	José-Luis Rebollo
Chair of the ERCC Operations Group	Nick Hamilton (JP Morgan)
Citibank	Marcello Topa
Commerzbank	Roland Kipper

⁸⁰ The AMI-SeCo's mandate is available for consultation at AMI-SeCo's mandate (accessed on 19 October 2017).

Danske Bank Plc	Rory Byrne
Deutsche Bank	Stephen Lomas
DZ Bank	Holger Meffert
HSBC Trinkaus & Burkhardt	Götz Röhr
ICBPI	Paolo Callegaro
Intesa Sanpaolo	Mario Recchia
JP Morgan	Diana Dijmarescu
KBC	Kris De Nul
Nordea Bank	Marianne Sørensen
OP Corporate Bank	Kirsi Sakki
Société Générale	Eric de Gay de Nexon
State Street	Swen Werner
Unicredit Bank Austria AG	Guenther Schnaitt
Central banks	
Nationale Bank van België/Banque Nationale de Belgique	Marc Lejoly
Danmarks Nationalbank	Peter Restelli-Nielsen
Deutsche Bundesbank	Matthias Schmuide
Central Bank of Ireland	Martin Langan
Bank of Greece	Vicky Dellopoulou
Banco de España	Jesús Pérez
Banque de France	Valérie Fasquelle
Banca d'Italia	Fabrizio Palmisani
Banque Centrale du Luxembourg	Pierre Thissen
De Nederlandsche Bank	Annemarie Hondius
Banco de Portugal	Pedro Corsino Matos
Banka Slovenije	Simon Anko
Financial Market Infrastructures	
Clearstream Banking Frankfurt	Matthias Papefuß
Clearstream Banking Luxembourg	Jean-Robert Wilkin
Euroclear	Edwin de Pauw
Euroclear Bank	Paul Symons
Iberclear	Jesús Benito
Monte Titoli	Mauro Dognini
OeKB CSD	Georg Zinner
VP Securities A/S	Niels Olsen

BME Clearing	Teresa Castilla
Eurex Clearing	Thomas Wißbach
EuroCCP (R ⁸¹)	Albert-Jan Huizing
ICE Clear Europe (R)	Camiel Janmaat
LCH.Clearnet SA	Christophe Hémon
Nasdaq Clearing (R)	Juuso Korhonen
Observers	
Association for Financial Markets in Europe (AFME)	Stephen Burton
Buy-side representation	Paul Baybutt
European Association of Clearing Houses (EACH)	Rafael Plata
European Association of Co-operative Banks (EACB)	Marieke van Berkel
European Central Securities Depositories Association (ECSDA)	Anna Kulik
European Banking Federation (EBF)	Daniele De Gennaro
European Funds and Asset Management Association (EFAMA)	Vincent Dessard
European Savings Bank Group (ESBG)	Rémy Moura
Federation of European Securities Exchanges (FESE)	Rainer Riess
HSG Chair – MIB Board in T2S Composition	Joël Mérére
European Securities and Markets Authority	Alina Dragomir
European Commission	Patrick Pearson
Eurosystem oversight function	Beata Wróbel
4CB	Philippe Leblanc

⁸¹ R: on a rotating basis.

© European Central Bank, 2018

Postal address 60640 Frankfurt am Main, Germany
Telephone +49 69 1344 0
Website www.ecb.europa.eu

All rights reserved. Reproduction for educational and non-commercial purposes is permitted provided that the source is acknowledged.

DOI 10.2866/85107 (pdf)
ISBN 978-92-899-3391-9 (pdf)
EU catalogue No QB-04-18-074-EN-N (pdf)