

SCoREBOARD

Corporate Actions - H1 2022

Austrian NSG

Background

Since publication of the Collateral Management Harmonisation Report in December 2017, the Advisory Group on Market Infrastructures for Securities and Collateral (AMI-SeCo) has made a number of significant breakthroughs in its ambition to create a Single Collateral Management Rulebook for Europe (SCoRE).

What is SCoRE?

SCoRE defines common rules for managing collateral in Europe. These rules will replace the fragmented legacy standards, structural constraints and complex and diverse market practices that exist across Europe today. Implementation of SCoRE should remove operational impediments to the availability, usage and mobility of collateral. Market participants in AMI-SeCo have committed to implementing the SCoRE Rulebook, with the first set of rules due to be implemented by November 2023. Their implementation efforts are regularly monitored by AMI-SeCo which facilitates an active dialogue with market participants on issues related to the clearing and settlement of securities and to collateral management.

National stakeholder groups (NSGs) are coordination forums to support the implementation of the Single Collateral Management Rulebook for Europe. They have been established in the markets covered by the AMI-SeCo in order to support the implementation of SCoRE.

The Single Collateral Management Rulebook for Europe (SCoRE) contains 15 Standards related to the processing of corporate actions (published as the SCoRE Standards for Corporate Actions). Implementation progress is monitored twice per year.

Introduction

This summary report presents the results of the H1 2022 monitoring exercise conducted by the Austrian NSG with the involvement among the following stakeholders:

1 CSD – OeKB CSD GmbH

14 entities are monitored in the Austrian market

5 Custodians

8 Issuers

The report focuses on the milestones to be met by the time the survey closed. In this monitoring exercise, participants were expected to have achieved all the milestones up to Milestone 6 inclusive as described in section 3 below.

Section 1 presents the key takeaways per entity type i.e. CSD, TPA, Custodian etc. Section 2 depicts for each entity type their compliance status with the standards. Section 3 focuses on the progress against the individual milestones and Section 4 provides concluding remarks.

Key takeaways

Timely implementation of ISO20022 considered as the main challenge in the Austrian market

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This section presents the actual situation of the Austrian market regarding the implementation of the SCORE standards in the corporate actions area. Austrian banks see and agree on the need for the implementation of the standards but there are issues of concern regarding the time schedule and details for the ISO 20022 implementation. The implementation of standard 15 is regarded as the main challenge in complying with these standards. The pandemic crisis and the implementation of regulatory requirements (SRD, SFTR, CSDR) supported by legal acts and with close mandatory deadlines are crucial and in the focus of the Austrian market which means that relevant resources are still tied up.

Figure 1

Summary of the monitoring exercise

S C C R R E	Response Rate	Implementation Status of the standards	Are all milestones 1 to 6 inclusive achieved?	Will the last milestone 13 be Implemented on time (i.e. by 20 November 2023) ?
Custodians	100%	Implemented 13.8% Analysis started 44.9% Implementation started 12.4% Analysis not started 28.7%	33%	100%
Issuers	25%	Aware of obligations 29.4% Not aware of obligations 2.94%	n/a	n/a
CSD - Oesterreichische Kontrollbank	100%	Implemented 22.7% Analysis started 5.90% Implementation started 71.3% Analysis not started 0%	No	Yes

CSD – OeKB CSD GmbH

According to the results of the survey OeKB CSD will meet milestones 3 to 5 by the end of June 2022. Milestone 7 will be accomplished by the end of the year. The preparations for the other milestones are continuing according to plan.

Custodians

Implementation status of Austrian custodians still diverse

CSD will meet future milestones

Some Custodians in the Austrian market have already implemented several standards. The discussions of custodians on the implementation of the SCoRE standards in the Austrian market are ongoing.

Issuers

Austrian Issuers also concerned about ISO20022 adaptation plan The main Austrian issuers are aware of the obligations under the SCoRE standards. Some Issuers in the Austrian market have already implemented several standards but concerns about the ISO 20022 adaptation timetable still remain.

NCB

Oesterreichische Nationalbank will adopt SCoRE standards for CA in accordance with the Austrian market

For the comprehensive adoption of the SCoRE standards for Corporate Actions, Oesterreichische Nationalbank (OeNB) is strongly dependent on the progress of the overall market. Naturally OeNB is committed to take a catalyst function to promote the implementation of these SCoRE standards beyond the first wave.

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Compliance level with the standards

This section provides an overview of the current status of compliance with the corporate actions standards. CSDs and TPAs are monitored on an individual basis and are assigned a colour-code status in accordance with the methodology outlined in figure 2 below. Custodians and Issuers are too many to represent individually. Thus the replies of custodians and issuers from the AMI-SeCo community participating in the monitoring are presented on an aggregated basis per market and assigned a percentage representing their compliance status.

Figure 2

Standards implementation status as defined in the AMI-SeCo framework document

🕻 R E **B O A R D** SINGLE COLLATERAL MANAGEMENT RULEBOOK FOR EUROPE

- The Standard has been implemented
- Implementation of the Standard is on schedule (based on the agreed milestones)
- Implementation is behind schedule (based on the agreed milestones)
- Implementation has not started

Table 1

Compliance level with the standards by each entity type

STANDARD	Custodians	lssuers	CSD - Oesterreichische Kontrollbank
1A: Notification	32%	38%	G
1B: Instruction	33%		G
1C: Advise	32%		G
1D: Confirmation	26%		G
1E: Reversal	27%		G
1F: Meeting Notification	42%	35%	В
1G: Meeting Instruction	47%		В
1H: Meeting Results	29%		В
2: Calculation of Proceeds	20%	38%	G
3: Consistency of Information	21%	38%	Y
4: Rounding Rule 1	40%	38%	В
4: Rounding Rule 2	40%	38%	В
4: Rounding Rule 3	40%	25%	В
4: Rounding Rule 4	40%	38%	G
4: Rounding Rule 5	40%	38%	Y
5: Negative Cash Flows	25%	25%	Y
6: Business Day Rule		38%	G
7: Securities Amount Data Rule 1		38%	Y
7: Securities Amount Data Rule 2		25%	Y
7: Securities Amount Data Rule 3		25%	Y
7: Securities Amount Data Rule 4		25%	Y
8: Payment Time Rule 1		13%	G
8: Payment Time Rule 2		13%	В
8: Payment Time Rule 3		6%	В
8: Payment Time General Principle 3		13%	Y
9: Processing Status	0%	38%	G
10: Blocking Rule 1	20%		Y
10: Blocking Rule 2	20%		Y
10: Blocking Rule 3	20%		Y
10: Blocking Rule 4	20%		Y
10: Blocking Rule 5	20%		Y
11: Default Option	40%	25%	В
12: Handling of Fees	20%		G
13: Reversal	20%	38%	G
14: Foreign Currency			В
15: ISO 20022 Messaging	31%		G

Notes:

For CSDs and TPAs the colour-code reflects the current implementation status of each Standard in accordance with the methodology outlined in figure 1 above.

Tabove. TPAs are using custody services provided by CSDs or Custodians in order to disseminate CA information to Collateral Givers and Collateral Takers. Monitoring of TPAs thus focuses on the implementation of triparty specific workflows described in Standard 1. For custodians, the percentage of custodians which have implemented standards / standards being under development and implementation. Issuers were asked to confirm awareness of their obligation to provide all relevant information to the Issuer CSD (on a Yes/No basis). The % reflects the number of issuers who responded yes to the survey Percentages are calculated on the basis of expected respondents, i.e. number of entities monitored in the market. -

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Progress towards the milestones

This section tracks market stakeholders progress in implementing the Standards against the 13 set milestones identified by AMI-SeCo.

The milestones facilitate consistent implementation across markets (given the longterm efforts that are needed) and avoids issues remaining undetected until the deadline of 20 November 2023 to achieve compliance and implementation of the standards.

Table 2Milestones identified by AMI-SeCo

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Milestone	Description	Date
M1	Analysis Started: Have you commenced an in-depth analysis of all applicable SCoRE Standards in order to identify and document all the changes required to internal processes and procedures in order to comply with the SCoRE Standards?	30/06/2020
M2	Initial Communication: Has initial high-level communication with external stakeholders on the changes introduced by SCoRE commenced?	01/03/2021
M3	Analysis Completed: Have you completed an in-depth analysis of all applicable SCoRE Standards?	31/07/2021
M4	Documentation Completed: Have you documented all the internal processes and procedures which need to be adapted in order to comply with the SCoRE Standards?	31/12/2021
M5	Detailed External Communication: Has detailed communication started regarding (i) upcoming changes in business processes, (ii) messaging formats and usage guidelines (in the case of new messages based on non-registered latest drafts by SWIFT) and (iii) planned testing activities been provided to users?	31/12/2021
M6	SCoRE Adaptation Started: Have you started to adapt/develop the processes and procedures in order to comply with the SCoRE Standards?	01/01/2022
M7	SCoRE Adaptation Complete: Have you completed the necessary adaptations/developments for the processes and procedures in order to comply with the SCoRE Standards?	30/06/2022
M8	Internal Testing Started for SCoRE: Have you started to test the changes to your internal processes and procedures which have been introduced in order to comply with the SCoRE Standards?	01/07/2022
M9	Internal Testing Complete for SCoRE: Have you completed the necessary internal testing?	02/12/2022
M10	External Testing Started for SCoRE: Are you in a position to test the changes introduced in order to comply with the SCoRE Standards with your user community (i.e. CSD participants / Collateral Givers and Collateral Takers in the context of the Standards applicable to TPAs)?	20/03/2023
M11	Final External Communication on SCoRE: has final communication to users been provided (i.e. updated user guide to reflect the changes implemented, final message usage guidelines for A2A communication) related to the SCoRE Standards?	01/04/2023
M12	External Testing Completed for SCoRE: Is the testing of the changes introduced in order to comply with the SCoRE Standards with your user community completed (i.e. CSD participants / Collateral Givers and Collateral Takers in the context of the Standards applicable to TPAs)?	13/10/2023
M13	SCoRE Standards Implemented: have the SCoRE Standards been implemented?	20/11/2023

The current H1 2022 monitoring exercise focuses on milestones 1 to 6 given that Milestone 6 (with a deadline of 1 January 2022) was meant to have been achieved by the time the survey closed.

In each survey round, all the entities are asked to confirm (on a yes/no basis) whether the milestones will be met by the set milestones dates. If it is not the case, they are also asked the expected date for when the milestone will be reached.

For the milestones which had to be achieved by the time the survey closed: the blue colour code is assigned to those milestones that have been successfully achieved. Milestones that will only be achieved later than their set deadline are assigned a yellow status with indication of the likely date of achievement.

For the milestones that are only due to be achieved after the current reporting cycle: the green colour code indicates that the entity anticipates achieving that future milestone on time. A yellow status indicates that the milestone is foreseen to be met later than the set milestone date. In this case, the date of achievement anticipated is also indicated in the table.

Table 3 Entities' expectation of achieving the milestones at the set dates

	Custodians	CSD - Oesterreichische Kontrollbank
Milestone 1 June 2020	60%	Yes
Milestone 2 March 2021	40%	Yes
Milestone 3 July 2021	20%	06/22
Milestone 4 December 2021	20%	06/22
Milestone 5 December 2021	20%	06/22
Milestone 6 January 2022	40%	Yes
Milestone 7 June 2022	20%	12/22
Milestone 8 July 2022	40%	Yes
Milestone 9 December 2022	40%	Yes
Milestone 10 March 2023	40%	Yes
Milestone 11 April 2023	80%	Yes
Milestone 12 October 2023	100%	Yes
Milestone 13 November 2023	100%	Yes

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Concluding remarks

Austrian banks see and agree on the need for the implementation of the standards but issues of concern in view of the time schedule and details for the ISO 20022 implementation remain. These issues, in particular standard 15, are regarded as the main challenge for compliance.

The COVID-19 pandemic and the implementation of regulatory requirements (SRD, SFTR, CSDR) supported by legal acts and with close mandatory deadlines are crucial and in the focus of the Austrian market participants which means that relevant resources are still tied up.

As some market participants have not started their internal analysis yet, consequently the more recent milestones have not been met.

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