

T2S Harmonisation – Mid-year update 2016

T2S Advisory Group
5 September 2016



harmonisation



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1 Background

The **T2S Advisory Group (AG)** publishes regular reports on the progress made by T2S markets in implementing the T2S harmonisation standards. These standards aim to foster the safety and efficiency of cross-CSD settlement in T2S. They also contribute to the improvement of the competitive environment across T2S markets and to EU financial integration more widely. As such, the T2S harmonisation agenda has always been viewed from the wider policy perspective of fostering integration in the European financial market.

The last progress report (Sixth T2S Harmonisation Progress Report) was issued by the AG on 18 March 2016.¹ The present publication is a mid-year update which complements the T2S Harmonisation Progress Reports. It focuses on the ex post compliance status of the T2S markets in migration wave 2 (28 March 2016) as well as the ex ante compliance status of the five T2S markets participating in migration wave 3 (12 September 2016). The compliance status of the other T2S markets is also included.

Following a summary of the key messages (Section 2), the report provides an update on the overall status of the T2S harmonisation agenda, i.e. the “T2S harmonisation activities” (Section 3). Section 4 covers the status of implementation of the T2S standards in each of the 21 markets that are either connected to T2S or plan to be connected by September 2017. The report concludes with a brief overview of the next steps envisaged by the AG in the coming months (Section 5). Annex 1 provides a short description of the colour status methodology used by the AG. Annex 2 includes further background compliance details for each T2S market monitored.

¹http://www.ecb.europa.eu/paym/t2s/progress/pdf/ag/sixth_t2s_harmonisation_progress_report.pdf



2 Key messages

- The two markets that migrated to T2S on 28 March 2016, i.e. Portugal (Interbolsa) and Belgium (NBB-SSS), are fully compliant with most T2S harmonisation standards (see Table 2.3). This is in line with the expectations based on the ex ante assessment of their implementation plans.
- The five markets migrating to T2S on 12 September 2016 demonstrate a very good record of already complying, or planning to comply, fully with most T2S harmonisation standards (see Table 2.4).
- However, in both migration waves, gaps still exist regarding full compliance with corporate action standards. This is also true of markets in other migration waves. As was the case in previous reports, corrective action from some T2S markets (AT, DE, FR, NL, BE (Euroclear), RO, PT and IT) is still required. The AG acknowledges that corporate actions are complex business processes for asset servicing involving rules and procedures developed by a range of different actors and national institutions. Implementation gaps still exist, but T2S markets have done a great deal of work to address them (see Table 2).
- The definition and implementation of a harmonised settlement discipline regime remains the key gap in completing the priority 1 T2S harmonisation activities (see Table 2). The relevant EU authorities are expected to adopt, in the course of 2016, the related regulatory and implementing technical standards of the CSD Regulation. This should complete the definition process and pave the way for implementation (i.e. regulatory compliance) by the T2S markets. With regard to the completion of the harmonisation activity covering the Settlement Finality I (SF1) concept (i.e. the moment of entry of a transfer order into the system), T2S stakeholders are in the process of completing the steps required to achieve full compliance with the agreed standard (see Table 1). All T2S CSDs and NCBs have signed the T2S collective agreement setting up the common T2S SF1 rule.
- The AG continues its efforts to foster progress in the remaining harmonisation activities throughout 2016. This requires coordinated effort on the part of the T2S community and the Eurosystem, in cooperation with the relevant EU and national public authorities. Some of these activities are receiving renewed momentum in the context of the European Commission's capital markets union (CMU) action plan.² In this context, the AG is fully committed to supporting the European Post Trade Forum (EPTF) established by the European Commission in February 2016 in order i) to review the remaining, or any new, barriers to an integrated post-trade environment in the EU, and ii) to provide technical advice to the Commission on follow-up actions.

²The European Commission published its action plan on 30 September 2015: http://ec.europa.eu/finance/capital-markets-union/docs/building-cmu-action-plan_en.pdf

3 T2S harmonisation activities

Table 1: Status dashboard of the T2S harmonisation activities (as at 10 August 2016)

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

As shown in Table 1, the AG is currently engaged in 24 harmonisation workstreams, also known as “T2S harmonisation activities”. The AG has categorised 16 of these 24 activities as “priority 1” (see Annex I for more details).³

Definition process – At present, the AG has endorsed the definition of standards for 17 activities (marked in green).⁴ It is important to note here that, of the seven activities for which a standard is missing, only one is a priority 1 activity, namely the settlement discipline regime. The adoption of the CSDR level 2 regulatory technical standards by the EU authorities in 2016 is expected to close this gap and potentially influence the definition of standards for two priority 2 activities (place of issuance and market access).⁵

³ Priority 1 activities are necessary to ensure efficient and safe cross-CSD settlement in T2S. The HSG and the ECB team should focus on these activities as first priorities for resolution and implementation prior to the markets’ migration to T2S.

⁴ Seventeen standards have been endorsed but only 16 are currently being monitored. See further information regarding the Settlement Finality I (SFI) topic.

⁵ Priority 2 activities are not essential to ensure safe and efficient cross-CSD settlement in T2S, but they are crucial to the enhancement of the competitive environment and the efficiency of T2S and should continue to be pursued after markets migrate to T2S.



Three activities have been assigned a red definition status in this update (i.e. location of securities accounts/conflicts of laws, shareholder transparency and tax procedures). This is primarily due to the need to tackle legal and regulatory barriers at the EU level. The AG is of the view that the CMU action plan could act as a catalyst for progress in the removal of these long-standing barriers.

Monitoring process – All 21 T2S markets, covering 23 CSDs,⁶ are now fully monitored to assess their compliance with the T2S harmonisation standards.

There are well-established and agreed monitoring frameworks, deadlines and responsible actors for further action in each market. There is no change in the number of activities (16) that are monitored in this reporting cycle as compared with the previous cycle.

Compliance – The rate of compliance of T2S markets is unchanged compared with the sixth progress report, with four activities marked in blue (no further monitoring required), nine activities in green, two activities in yellow and only one activity in red.

⁶ A new CSD signed the T2S Framework Agreement in May 2016 and will be included in the next reporting cycle.

4 Compliance statuses

The tables below present the monitoring results for each T2S market for each of the 16 monitored standards. The colour statuses are assigned by the AG based on information provided by the T2S NUGs⁷ (i.e. national stakeholders comprising NCBs, CSDs and market participants).

Table 2: T2S harmonisation scoreboard (as at 10 August 2016)

| 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 II | 8 T2S settlement finality III | 9 T2S finality II | 10 Outsourcing IT (settlement) services | 11 Settlement cycle | 12 Settlement on omnibus accounts | 13 Availability of omnibus accounts | 14 Restrictions on omnibus accounts | 15 Securities account number | 16 Cash account number | 17 CA market standards (CAJWG) | 18 G | 19 G | 20 G | 21 G | 22 G |
| AT | G | G | B | B | G | R-? | B | B | B | B | B | B | B | B | B | B | G | G | Y | B | | |
| BE Euroclear | G | G | B | B | G | R-Feb 2018 | B | G | B | B | B | B | B | B | B | G | G | G | G | B | B | |
| BE - NBB-SSS | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | R-? | B | B | R | B | | |
| CH | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | NA | G | G | B | B | | |
| DE | G | G | B | B | G | R-? | G | G | B | B | B | B | B | B | B | G | B | G | B | B | | |
| DK | G | G | B | B | G | G | B | G | B | B | B | B | B | B | B | G | B | G | G | B | | |
| EE | G | G | B | B | G | G | B | G | B | B | B | B | B | B | B | G | G | Y | B | | | |
| ES | G | G | G | B | G | G | B | B | B | B | G | B | B | B | B | B | B | G | B | B | | |
| FI | B | B | B | B | G | G | B | B | B | B | B | B | B | B | B | Y | B | G | Y | B | | |
| FR | G | G | B | B | G | R-Feb 2018 | B | G | B | B | B | B | B | B | B | Y | G | B | G | B | | |
| GR - BOGS | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | | |
| HU | G | G | B | B | G | G | G | G | B | B | B | B | B | B | B | G | NA | R | R | B | | |
| IT | B | B | B | B | B | R-Dec 2016 | B | B | B | B | B | B | B | B | B | B | B | B | B | B | | |
| LT | G | G | B | B | G | G | G | G | B | B | B | B | B | B | B | B | G | R | B | B | | |
| LU - LUX CSD | G | G | B | B | G | G | G | B | B | B | B | B | B | B | B | B | B | R | R | B | | |
| LU - VP LU X | G | G | B | B | G | G | B | B | B | B | B | B | B | B | B | B | B | R | R | B | | |
| LV | G | G | B | B | G | G | G | G | B | B | B | B | B | B | B | B | G | G | G | G | | |
| MT | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | B | G | B | | |
| NL | G | G | B | B | G | R-Feb 2018 | B | G | B | B | B | B | B | B | G | B | G | B | G | B | | |
| PT | B | B | B | B | B | R-Nov 2016 | B | B | B | B | B | B | B | B | B | B | B | B | B | B | | |
| RO | B | B | B | B | B | R-Feb 2017 | B | B | B | B | B | B | B | B | B | B | Y | B | | | | |
| SI | G | G | B | B | G | G | G | G | B | B | B | B | B | B | B | B | G | R | G | R | | |
| SK | G | R-? | G | B | G | G | G | G | B | B | B | B | B | B | B | Y | G | G | R | G | | |

⁷ The compliance information in column 18, "CA market standards (CAJWG)" is provided to the AG by the European Market Implementation Groups.



Table 2 shows the draft harmonisation compliance scoreboard of the T2S markets. Out of 368 statuses reported therein:

- 63% are already blue, meaning full compliance for the relevant markets in the production phase.
- 30% are green, i.e. the relevant NUGs have provided a detailed plan for achieving full compliance before migration to T2S. In addition, the AG has not identified any obstacles to the achievement of this objective for the markets in question.
- 2% are yellow, i.e. there are still technical or regulatory barriers but full compliance before migration is still possible and planned.
- 5% are red, i.e. compliance either has not been achieved or is not achievable upon migration to T2S.⁸

⁸ The number of red statuses may be subject to change following further discussions and possible revisions to the compliance methodology used by the AG. For example, some of the yellow and green statuses in the market corporate actions activity may turn to red, at least for the T2S markets that have already migrated.

**Table 2.1: T2S harmonisation scoreboard, delta changes from the Sixth Progress Report
(as at 10 August 2016)**

| 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 II | 8 T2S settlement finality III | 9 T2S IT (settlement) services | 10 Outsourcing IT (settlement) services | 11 Settlement cycle | 12 Availability of omnibus accounts | 13 Restrictions on omnibus accounts | 14 Securities account number | 15 Securities account number | 16 Cash account number | 18 CA market standards (CAJWG) |
| AT | | | | | Y R | | | | | | | | | | | | |
| BE Euroclear | | | | | G B | G B | | | | | | | | | | | |
| BE – NBB-SSS | | | | | R B | | | | | | | Y R | | G B | | | |
| CH | | | | | | | | | | | | | | | | | |
| DE | | | | | | | | | | | | | | | | | |
| DK | | | | | | | | | | | | | | | | | |
| EE | | | | | | | | | | | | | | | | | |
| ES | | | | | | | | | | | | | | | | | |
| FI | | | | | | | | | | | | | | | | | |
| FR | | | | | | | | | | | | | | | | | |
| GR – BOGS | | | | | | | | | | | | | | | | | |
| HU | | | | | | | | | | | | | | | | | |
| IT | | | | | | | | | | | | | | | | | |
| LT | | | | | | | | | | | | | | | | | |
| LU – LUX CSD | | | | | | | | | | | | | | | | G B | |
| LU – VP LUX | | | | | | | | | | | | | | | | G B | |
| LV | | | | | | | | | | | | Y G | | | | | |
| MIT | | | | | | | | | | | | | | | | | |
| NL | | | | | | | | | | | | | | | | | |
| PT | | | | | | | | | | | | G B | G B | | G B | G B | |
| RO | | | | | | | | | | | | | | | | | |
| SI | | | | | | | | | | | | | | | | | |
| SK | | | | | | | | | | | | | | | | | |

Table 2.1 shows an improvement with regard to 16 statuses, most of which have changed from green to blue. This is the effect of migration to T2S, which usually leads to full compliance. There are two deteriorations, reflecting the methodological effect of migration and some further compliance gaps with the T2S CA standards.

**Table 2.2: Compliance scoreboard for migration wave 2 (as at 10 August 2016)**

| 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 | 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 | B | B | B | B | B | B | B | R -? | B | B | R - No Info | B | |
| PT | B | B | B | B | B | R - Nov 2016 | B | B | B | B | B | B | B | B | B | B | |

As shown in Table 2.2, the good compliance record of the migrated markets has also been continued in the case of Belgium (NBB-SSS) and Portugal, which joined T2S on 28 March 2016. The key gaps remain in the area of corporate actions (CA) compliance.

The Portuguese market has committed to fully comply with the T2S CA standards by 14 November 2016. The limited restrictions on the usage of some omnibus accounts, mostly for managing the fiscal status of participants, have resulted in a red non-compliance status for the Belgian market (NBB-SSS).

Table 2.3: Compliance scoreboard for migration wave 3 (as at 10 August 2016)

| 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 | 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 | G | G | B | B | G | R - Feb 2018 | B | G | B | B | B | B | G | G | G | B | |
| DK | G | G | B | B | G | G | B | G | B | B | B | B | G | B | G | B | |
| FR | G | G | B | B | G | R - Feb 2018 | B | G | B | B | B | Y | G | B | G | B | |
| LU – VP LUX | G | G | B | B | G | G | B | B | B | B | B | B | G | B | R - No info | B | |
| NL | G | G | B | B | G | R - Feb 2018 | B | G | B | B | B | B | G | B | G | B | |

As shown in Table 3, the five T2S markets due to migrate on 12 September 2016 show a good record of implementation. The majority of the statuses are blue or green. The exceptions, primarily in the area of corporate actions, are well known and have been analysed by the AG community also in the context of the AG's impact analysis report. The three ESES markets (FR, NL and BE) announced on 5 July 2016 the publication of a detailed service description in Q4 2016 and client testing in Q4 2017 for achieving full compliance with the T2S CA standards by February 2018.

Table 3: Summary of comparative statistics – Sixth Progress Report compared with mid-year update (as at 10 August 2016)

| | Sixth Progress Report | | | 2016 mid-year update report | | |
|--------|-----------------------|------------|------------|-----------------------------|------------|------------|
| | Priority 1 | Priority 2 | % of total | Priority 1 | Priority 2 | % of total |
| Blue | 194 | 21 | 58 | 207 | 23 | 63 |
| Green | 111 | 14 | 34 | 100 | 12 | 30 |
| Yellow | 7 | 4 | 3 | 3 | 4 | 2 |
| Red | 8 | 7 | 4 | 10 | 7 | 5 |
| N/A | 2 | 0 | 0 | 2 | 0 | 0 |
| Total | 322 | 46 | 368 (100%) | 322 | 46 | 368 (100%) |

5 Next steps

In the coming months, the AG will continue to focus its harmonisation efforts on the completion of the definition and monitoring processes, in particular in the prioritised workstreams of the T2S harmonisation agenda (priority 1 activities).

The AG will closely monitor the ex post compliance of the markets in the third migration wave (12 September 2016) as well as the implementation plans of those in the fourth migration wave (7 February 2017).

As already agreed by the T2S stakeholders, the publication of the harmonisation reports will be related to the migration waves, e.g. the seventh T2S Harmonisation Progress Report will be published before the fourth migration wave.

In the case of non-complying T2S markets, the AG will continue to assess the impact the implementation gaps (red statuses) might have on the cross-border settlement efficiency of T2S. The AG will provide its advice to the Market Infrastructure Board accordingly.

Pending the adoption of CSDR regulatory technical standards, the AG will assess whether the T2S community needs to take any further action on the affected T2S harmonisation activities (i.e. settlement discipline regime, market access and place of issuance).

Finally, the AG will seek to encourage progress on the priority 2 activities, in cooperation with market stakeholders and public authorities. In this context, the AG members fully support the European Commission's CMU action plan and are committed to providing technical support to the Commission's European Post Trading Forum (EPTF), where necessary. The T2S community is represented in the EPTF by the chairman of the T2S HSG.



Annex 1: Methodology: Priorities and Statuses

For more detailed information regarding the methodology used in compiling these results, see Annex 1 of the Sixth T2S Harmonisation Progress Report.

T2S harmonisation activities are broken down into priority 1 and priority 2 topics:

- Priority 1 activities are necessary to ensure efficient and safe cross-CSD settlement in T2S. The HSG and the ECB team should focus on these activities as first priorities for resolution and implementation prior to the markets' migration to T2S.
- Priority 2 activities are not essential to ensure safe and efficient cross-CSD settlement in T2S, but they are key for the enhancement of the competitive environment and the efficiency of T2S, and should continue to be pursued after the markets' migration to T2S.

Table No 4: Colour methodology in the different harmonisation processes

| Colour | Description |
|--------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| BLUE | <p>Compliance The market has achieved full compliance with the harmonisation standard.</p> <p>a. For technical standards (e.g. T2S ISO 20022 messages), this means that the T2S market is already operating according to the standard.</p> <p>b. 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 The relevant stakeholder bodies (in or outside T2S) have defined and agreed/endorsed the standards for the harmonisation activity.</p> <p>Monitoring The monitoring actors (in 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>1) There are changes still pending (technical, regulatory or legal) before the T2S market can achieve full compliance with the harmonisation standard, but no obstacles have been identified to achieving full compliance by the deadline.</p> <p>and</p> <p>2) The market has established a clear/detailed plan to implement 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 Open issues remain concerning the definition and agreement of the standards for the harmonisation activity by the relevant stakeholder bodies (in or outside T2S). However, stakeholders have agreed a roadmap and an approach to resolving pending issues in order to achieve agreement on the standard.</p> <p>Monitoring The monitoring actors (in 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 on an irregular basis.</p> <p>Compliance</p> <p>1) There are changes still pending (technical, regulatory or legal) before the T2S market can achieve full compliance with the given harmonisation standard, but obstacles have been identified which may threaten achievement of full compliance by the deadline.</p> <p>or</p> <p>2) The T2S market has issued a statement that it will implement the standard, but has not committed to concrete and publicly announced dates for implementation.</p> <p>Further monitoring of the T2S market is required.</p> |

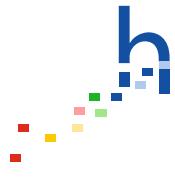
| | |
|-----|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| RED | <p>Definition Relevant stakeholder bodies (in or outside T2S) have not reached an agreement on the definition of the standard and stakeholders have not agreed a roadmap or an approach to achieving agreement on the standard. Stakeholders have not agreed a formal plan to achieve compliance with the standards.</p> <p>Monitoring The monitoring stakeholders have not defined and/or not implemented a framework for monitoring and reporting progress on the T2S markets' compliance with the harmonisation standard.</p> <p>Compliance</p> <ul style="list-style-type: none"> 1) The T2S market has not provided any information on its level of compliance with the standard. <i>or</i> 2) The T2S market has decided not to (fully) comply with the standard. <i>or</i> 3) There are changes 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 stopped the implementation plan of the market and/or will prevent its full implementation by the deadline. <p>Further monitoring of the T2S market is required.</p> |
| X | Process not started yet |



Annex 2 : Detailed monitoring information per T2S market

| 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 |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|-----------------|-----------------|-------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | | | | If standards/rules are not yet implemented, please specify what the type of gap is (see dropdown list) | Fully operational according to the T2S standard | | |
| Priority 1 | | | | | | | | |
| T2S messages | 1. T2S ISO 20022 messages | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 06/02/2017 | OeKB | No barriers identified for achieving full compliance before migration to T2S. |
| | 2. T2S matching fields | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 06/02/2017 | OeKB | 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 | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 06/02/2017 | OeKB | Info source: 2014 NUG survey. OeKB schedule will be adapted to T2S schedule by February 2017 (migration to T2S). |
| Corporate actions | Market claims (23 standards) Transformations (13 standards) | 7% | R | Major technical changes/Market practice changes | Not available | | | Info source: May 2016 EASG gap analysis update and further NUG clarification. The AT market will not comply with MC standards 6 and 7 or with MC standard 23 as it will not provide a user-friendly facility to control the interdependence of the settlement of the market claim with the underlying transaction. In addition, uncertainty remains with regard to compliance with MC standard 13 regarding the information flow between the issuer/issuing agents and the CSD - it is not yet clear whether this will be introduced on time. |
| | Buyer protection (18 standards) | 0% | | | | | | CANG and T2S NUG (CSD, CCP, banks and issuers) |
| | 6. Corporate actions T2S CA standards (59) | 39% | | | | | | |
| Legal harmonisation | 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 transfers. |
| | 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. |
| CSD account structures | 10. Outsourcing IT (Settlement) services | Fully compliant | B | N/A | N/A | N/A | N/A | Market already complies with the standard. |
| | 12. Settlement cycles | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: 2014 HSG survey on IT outsourcing. |
| T2S accounts numbering | 13. Availability of omnibus accounts | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: Bilateral confirmation from NUG. Fully compliant since 1 October 2014. |
| | 14. Restrictions on 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. |
| | 15. Securities account numbering | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 06/02/2017 | OeKB | Info source: T2S securities account numbering, April-May 2013 and Q3 2013 CS3 status gathering template |
| | 16. Dedicated cash account numbering | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 12/09/16 | OeNB | Info source: HSG survey on T2S DCA numbering, April-May 2013 |
| Priority 2 | | | | | | | | |
| Corporate actions | 18. Corporate actions | 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 |
| | 23. Securities amount static data | | | | Green (G), yellow (Y), red (R) | If the standards/rules are not yet implemented, please specify what the type of gap is (see dropdown list) | Relevant national actions for implementation | |
| Ca market standards (68) | | | | | | | | |
| | 18. Corporate actions | | 66% | Y | For some standards there is no implementation plan as market participants have refused to follow the market practice | Q2 2016 | 06/02/2017 | Austrian Corporate Actions National Implementation Group (CANIG) |
| | 23. Securities amount static data | | Fully compliant | B | N/A | N/A | N/A | Info source: T2S NUG survey and bilateral input. |
| Full compliance with European market practice | | | | | | | | |
| <small>Info source: BSG/E-MIG Survey (Sep 2015). 45 (out of 68) standards already met - 65% compliance. No implementation date available for standards on distributions with options⁵.</small> | | | | | | | | |

| T2S harmonisation activities: Belgium (Euroclear) | | | | | | | |
|-----------------------------------------------------------------------------|-------------------|------------------------------------------------------------------------------------------------------------|-------------------------------|---------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Activity | Sub-activity | Compliance | Status | Type of implementation gap | Implementation plan/date If standards/rules are not met timetable and various milestones/dates in the implementation plan. | Implementation actor(s) | Further comments |
| | | Indicates level of compliance with the relevant standard/rules Green (G), yellow (Y), red (R), blue (B) | | If the standard/rules are not yet implemented, please specify what the type of gap is | Ready for T2S testing | Relevant national actors for implementation | |
| | Priority 1 | | | | | | |
| 1. T2S ISO 20022 messages | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 12/09/2016 | Eurodear | Info source: SP2, and bilateral input. Technical compliance for testing and full compliance by migration |
| 2. T2S matching fields | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 12/09/2016 | Eurodear | 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 | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 12/09/2016 | Eurodear | Info source: SP2 and bilateral input and status gathering templates. The ESE's operational day will be amended to adhere to the timing of T2S. The T2S accounting day will be considered the master day. |
| Market claims (28 standards) | 50% | Major technical change | Major technical change | Testing readiness achieved | Q4 - 2017 | Eurodear | Info source: May 2016 CASS gap analysis update and further NUG clarification. Full compliance only with some (mainly market claims) CA standards by the time of migration to T2S in September 2016. Will not comply fully with transformation and buyer protection standards. Regarding the date for achieving full compliance with all T2S CA standards, the milestones shared with the market are publication of the detailed Service Description in Q4 2016 with client testing in Q4 2017 for achieving full compliance in February 2018. In addition, the Belgian market is looking to effect a change in its securities law to become fully compliant with the BP standards. |
| Transformations (13 standards) | 0% | | | | | | |
| Buyer protection (18 standards) | 0% | R- Feb 2018 | Other | | February 2018 | Eurodear | Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input. EoC (BE) already complies with only bilateral cancellation after matching status. |
| 6. Corporate actions T2S CA standards (59) | | | | | | | |
| 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. Terms and conditions will be updated to implement SfII in T2S. This update will have to be presented and approved, where applicable, by the Belgian regulator (Nationale Bank van België/Banque Nationale de Belgique). No barriers identified in this process. |
| 9. Settlement Finality III: irrevocability of securities transfers | Not compliant | G | May require regulatory change | N/A | 12/09/2016 | Eurodear | |
| Legal harmonisation | | | | | | | |



| | | | | | | | | | |
|------------------------|------------------------------------------|-----------------------------------------------------------------|------------------------------------|----------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|-------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|
| | 10. Outsourcing IT (Settlement) services | Fully compliant | B | N/A | 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. |
| 12. Settlement cycles | | Fully compliant | B | N/A | 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 | 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 | N/A | Info source: T2S NUG survey and bilateral input. No restrictions on usage of omnibus accounts. |
| T2S accounts numbering | 15. Securities account numbering | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 12/09/2016 | Euroclear | Info source: HSG Survey on T2S securities account numbering, May 2013. No barriers identified. | |
| | 16. Dedicated cash account numbering | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 12/09/2016 | NBB | Info source: HSG survey on T2S DCA numbering, April-May 2013 and bilateral input from BE NUG. No barriers identified. | |
| | Activity | Compliance | Status | Type of implementation gap | If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan. | Implementation plan/date | Implementation actor(s) | Relevant national factors for implementation | Further comments |
| | Sub-activity | Indicates level of compliance with the relevant standards/rules | Green (G), Yellow (Y), and Red (R) | If the standard/rules are not yet implemented, please specify what the type of gap is (use the dropdown list). | Ready for T2S testing | Fully operational according to the T2S standard | | | |
| | Priority 2 | | | | | | | | |
| 18. Corporate actions | CA market standards [68] | 78% | G | Market practice change | Not available | Not available | Euroclear | Info source: BSE/E-MIG Survey (Sep 2015). 53 (out of 68) standards already met, showing some improvement from the last assessment. Final implementation expected with Euroclear launch of Stream 6 – after migration to T2S - Sep 2016 | |
| | 23. Securities amount static data | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S NUG survey and bilateral input. There are no issues with securities amount data for the ESEs countries. | |

| 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 action(s) |
| | | | | | Ready for T2S testing | |
| Priority 1 | | | | | | |
| 1. T2S ISO 2022 messages | | Fully compliant | B | N/A | N/A | N/A |
| 2. T2S matching fields | | Fully compliant | B | N/A | N/A | N/A |
| 3. Interaction for registration | | Fully compliant | B | N/A | N/A | N/A |
| 4. Interaction for tax info | | Fully compliant | B | N/A | N/A | N/A |
| 5. T2S schedule of settlement day | | Fully compliant | B | N/A | N/A | N/A |
| 6. Corporate actions T2S CA standards (59) | Market claims (28 standards) Transformations (13 standards) Buyer protection (18 standards) | 89% | B | N/A | N/A | BE NUG |
| 7. Legal harmonisation | 8. Settlement Finality II: irrevocability and enforceability transfer order | Fully compliant | B | N/A | N/A | N/A |
| 9. Settlement Finality III: irrevocability of securities transfers. | Fully compliant | B | N/A | N/A | N/A | N/A |
| 10. Outsourcing IT (Settlement) services | Fully compliant | B | N/A | N/A | N/A | N/A |
| 11. Settlement cycles | Fully compliant | B | N/A | N/A | N/A | N/A |
| CSD account structures | 13. Availability of omnibus accounts 14. Restrictions on omnibus accounts | Fully compliant Not compliant | R | Market practice change | Not available | NBB-SSS |
| T2S accounts numbering | 15. Securities account numbering 16. Dedicated cash account numbering | Fully compliant Fully compliant | B | N/A | N/A | N/A |
| 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 action(s) |
| 18. Corporate actions | CA market standards (44) | | Not available | R - No info | Other | Not available |
| 23. Securities amount static data | | Fully compliant | B | N/A | N/A | N/A |
| Priority 2 | | | | | | |
| Activity | Sub-activity | 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 (list the dropdown list) | Ready for T2S testing | Fully operational according to the T2S standard |
| 18. Corporate actions | CA market standards (44) | | Not available | R - No info | Other | Not available |
| 23. Securities amount static data | | Fully compliant | B | N/A | N/A | N/A |



| Activity | Sub-activity | Compliance | Status | Type of implementation gap | Implementation plan/date | | Implementation actor(s) | Further comments |
|------------------------------------------------------------|----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|--------------------------------|----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|------------------------------------------------------------------------------------|-------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | | | | If standards/rules are not yet implemented, please specify what the type of gap is | If standards/rules are not yet implemented, please specify what the type of gap is | | |
| T2S harmonisation activities: Switzerland (SIS/SIS) | | | | | | | | |
| | | | | | | | | |
| T2S messages | 1. T2S ISO 20022 messages | Fully compliant | B | N/A | N/A | N/A | N/A | N/A |
| | 2. T2S matching fields | Fully compliant | B | N/A | N/A | N/A | N/A | N/A |
| | 3. Interaction for registration | Fully compliant | B | N/A | N/A | N/A | N/A | N/A |
| | 4. Interaction for tax info | Fully compliant | B | N/A | N/A | N/A | N/A | N/A |
| | 5. T2S schedule of settlement day | Not compliant | B | N/A | N/A | N/A | N/A | N/A |
| | 6. Corporate actions T2S CA standards (59) | Market claims (28 standards) Transformations (13 standards) Buyer protection (18 standards) | B 100% 100% 100% | N/A N/A N/A | N/A N/A N/A | N/A N/A N/A | N/A N/A N/A | Info source: 2nd tCAg gap analysis survey 2015. Since its migration to T2S, the Swiss market has achieved full compliance with the T2S CA standards. |
| | 8. Settlement Finality I: irrevocability and enforceability transfer order | Fully compliant | B | N/A | N/A | N/A | N/A | N/A |
| | 9. Settlement Finality III: irrevocability of securities transfers. | Fully compliant | B | N/A | N/A | N/A | N/A | N/A |
| | 10. Outsourcing IT (Settlement) services | Fully compliant | B | N/A | N/A | N/A | N/A | N/A |
| | 12. Settlement cycles | Fully compliant | B | N/A | N/A | N/A | N/A | N/A |
| | 13. Availability of omnibus accounts | Fully compliant | B | N/A | N/A | N/A | N/A | N/A |
| | 14. Restrictions on omnibus accounts | Fully compliant | B | N/A | N/A | N/A | N/A | N/A |
| | 15. Securities account numbering | Fully compliant | B | N/A | Testing readiness achieved | N/A | N/A | N/A |
| | 16. Dedicated cash account numbering | N/A | N/A | N/A | N/A | N/A | N/A | N/A |
| CSD account structures | Activity | Compliance | Status | Type of implementation gap | Implementation plan/date | Implementation actor(s) | Further comments | |
| | Sub-activity | Indicate level of compliance with the relevant standard/rule | Green (G), yellow (Y), red (R) | If the standard/rules are not yet implemented, please specify what the type of gap is (use the dropdown list). | Ready for T2S testing | Final implementation date not available | SIS | Info source: BSG/E-MIG Survey (Sep 2015). 64 (out of 68) standards already met. Guaranteed participation date and buyer protection deadline for mandatory reorganisation with options and voluntary reorganisation are partly implemented. |
| 18. Corporate actions | CIA market standards (68) | 94% | G | Straight-forward to implement | Testing readiness achieved | | | |
| 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. |

| Activity | Sub-activity | Compliance | Status | Type of implementation gap | Implementation plan/date and various milestones/dates in the implementation plan. | | Implementation actor(s) | Further comments | | | |
|----------------------------------------------------------------------------|--------------------------------------|------------------------|-------------------------------|------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------|--|--|--|
| | | | | | If standards/rules are not fulfilled, please provide the timetable and relevant milestones/dates in the implementation plan. Fully operational according to the T2S standard | Ready for T2S testing | | | | | |
| Priority 1 | | | | | | | | | | | |
| 1. T2S ISO 20022 messages | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 06/02/2017 | CIBF | Info source: SP2 and bilateral input. Full compliance is planned upon migration to T2S. | | | | |
| 2. T2S matching fields | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 06/02/2017 | CIBF | Info source: SP2 and bilateral input. Full compliance is planned upon migration to T2S. | | | | |
| 3. Interaction for registration | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S HSIG surveys 2013. Settlement messages are not used for transmission or registration information. | | | | |
| 4. Interaction for tax info | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S HSIG surveys 2013. Settlement messages are not used for transmission of tax information. | | | | |
| 5. T2S schedule of settlement day | Not compliant | G | Change of market practice | Testing readiness achieved | 06/02/2017 | CIBF | Info source: SP2 and bilateral input and NUG survey 2014. Plan and dates for full compliance with T2S schedules are available. Minor operational issues relating to specific ISIN processes do not affect overall compliance with the T2S schedule. | | | | |
| Market claims (2B standards) Transformations (13 standards) | 46% | Legislative change | | For high impact standards: At the latest 6 months after CIB's migration to T2S. For low impact standards: no current plan | | CIBF / national authorities, SWIFT format: DSS/SUG | Info source: May 2016 CASSI gap analysis update and NUG clarifications Record date will be introduced on the German market on 1.1.2017 before DE migration to T2S in February 2017. Implementation of the standards with a high impact on the T2S community (payment on T2S DCA accounts and managing of fractions) is scheduled within six months of Clearstream's migration to T2S. The German market does not yet have a plan to eventually comply with the two remaining standards, with negligible impact (TCM/T flag and generating of MOC independently of settlement of the underlying transaction). It may draw up such plans only after discussions with the authorities and analysis of volume developments following the introduction of the record date. | | | | |
| 6. Corporate actions T2S CA standards (59) | 0% | Legislative change | | Testing readiness achieved | | Info source: T2S HSIG surveys 2013 and 2012. SP2 and bilateral input. The bilateral cancellation (after matching) principle will be introduced on the German market upon Clearstream's migration to T2S. | | | | | |
| Buyer protection (18 standards) | 94% | Market practice change | | Testing readiness achieved | | Info source: HSIG survey on T2S settlement finality rule III. Need for changes in the CSD rules. No barriers have been identified by NUG. Full compliance by migration to T2S. | | | | | |
| 8. Settlement finality I: irrevocability and enforceability transfer order | Not compliant | G | Straight-forward to implement | N/A | 06/02/2017 | CIBF | Info source: 2014 HSIG survey on IT outsourcing. | | | | |
| 9. Settlement finality II: revocability of securities transfers. | Not compliant | G | Straight-forward to implement | N/A | 06/02/2017 | CIBF | Info source: HSIG survey on T2S settlement finality rule IV. Fully compliant since 6 October 2014. | | | | |
| 10. Outsourcing IT (settlement) services | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: 2014 HSIG 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 | Info source: T2S HSIG survey and bilateral input. | | | | |
| 14. Restrictions on omnibus accounts | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S HSIG survey and bilateral input. | | | | |
| T2S accounts numbering | 15. Securities account numbering | Not compliant | G | Straight-forward to implement. | Testing readiness achieved | 06/02/2017 | CIBF | Info source: HSIG 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: list of cash and securities side DCPs as published by DCFC and further confirmation from the DE NUG. | | | | |
| Priority 2 | | | | | | | | | | | |
| Activity | Sub-activity | Compliance | Status | Type of implementation gap | If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan. | Implementation plan/date and various milestones/dates in the implementation plan. | Implementation actor(s) | Relevant national actor(s) for implementation | | | |
| 18. Corporate actions | CA market standards (68) | 93% | G | Regulatory/legislative change | Testing readiness achieved | 06/02/2017 | German MiG | | | | |
| 23. Securities amount static data | | Fully compliant | B | N/A | N/A | N/A | N/A | | | | |

Info source: ISSG/L-MiG Survey (Sep 2015).

63 (out of 68) standards already met. Clearstream published on its website the final version of BP instruction template agreed by L-MiG and T2S CASG as well as the requirements of the market and T2S BP standards, including the agreed timeline.

Info source: T2S HSIG survey and bilateral input.

Info source: T2S HSIG survey and bilateral input.

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| Activity | Sub-activity | Compliance | Status | Type of implementation gap | Implementation plan/date | | Implementation actor(s) | Further comments |
|--------------------------------------------|------------------------------------------------------------------------------|--------------------------|--------|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|----------------------------|----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | | | | If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan. | Ready for T2S testing | | |
| Priority 1 | | | | | | | | |
| T2S messages | 1. T2S ISO 20022 messages | Not compliant | G | Straight-forward to implement | Testing readiness achieved | September 2016 | VP | 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 | Not compliant | G | Straight-forward to implement | Testing readiness achieved | September 2016 | VP | 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 NUG survey 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: SP2, bilateral input and NUG survey 2014. Full compliance with the T2S schedule. No issues identified except general concerns about the End of Day reporting and Start of Day time period. |
| | 5. T2S schedule of settlement day | Not compliant | G | Technical change/market practice | Testing readiness achieved | September 2016 | VP and DK NUG | Info source: May 2016 CASG gap analysis update. As part of the implementation plan provided by DK NUG, VP will offer an automated CA detection/solution. Mandatory community testing was completed in April 2016, prior to T2S migration (September 2016). |
| Corporate actions T2S CA Standards (59) | Market claims (28 standards) Transformations (13 standards) | 21% | G | Major technical change | Testing readiness achieved | September 2016 | VP and DK NUG | Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input. Full compliance with T2S SF rule. |
| | Buyer protection (18 standards) | 0% | G | Major technical change | N/A | N/A | N/A | Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input from the DK NUG. |
| Legal harmonisation | 8. Settlement Finality II: irrevocability and enforceability transfer order | Fully compliant | B | N/A | N/A | N/A | N/A | Two new provisions in the VP SECURITIES Clearing rules will ensure that settlement in T2S is unconditional, irrevocable and enforceable under Danish law. The changes to the Danish Securities Trading Act were sent for consultation in December 2015, with entry into force on 3 July 2016. The amendments will in practice become effective with the migration of the Danish market to T2S. |
| | 9. Settlement Finality III: irrevocability of securities transfers. | Not compliant | G | CSD rule/regulatory/legislative approval | N/A | 12 September 2016 | Financial Supervisory Authority (Danish Authority) | Info source: T2S NUG survey 2013. Only system changes are required. |
| CSD account structures | 10. Outsourcing IT (Settlement) services | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: 2016 HS survey on IT outsourcing. Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2015. |
| | 12. Settlement cycles | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S NUG survey and bilateral discussions. |
| T2S accounts numbering | 13. Availability of omnibus accounts 14. Restrictions on omnibus accounts | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S NUG survey and bilateral discussions. |
| | 15. Securities account numbering 16. Dedicated cash account numbering | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 12/09/2016 | VP | DK NCB Info source: Confirmation from the Danish NUG. |
| Activity | Sub-activity | Compliance | Status | Type of implementation gap | If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan. | Ready for T2S testing | Fully operational according to the T2S standard | Implementation actor(s) Relevant national actors for implementation Further comments |
| | 18. Corporate actions 23. Securities amount static data | CA market standards (68) | 85% | G | Market Practice Change | Testing readiness achieved | September 2016 | VP and Danish NUG 58 (out of 68) standards already met. Info source: T2S NUG survey and bilateral discussions. |

| T2S harmonisation activities: Estonia | | | | | | | | | |
|---------------------------------------|-----------------------------------------------------------------------------|--------------------------|-----------------|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| Activity | Sub-activity | Compliance | Status | Type of implementation gap | Implementation plan/date | | Implementation actor(s) | Further comments | |
| | | | | | If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan. | 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 | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 18/09/2017 | ECSD | Info source: SP2 and bilateral input. 2013 Q2 status gathering confirmed, Plans for full compliance by migration date are confirmed and no issues identified. | |
| | 2. T2S matching fields | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 18/09/2017 | ECSD | Info source: SP2 and bilateral input. 2013 Q2 status gathering template, Plans for full compliance by migration date are confirmed and no issues identified. | |
| | 3. Interaction for registration | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S HSG survey 2013. Settlement messages do not contain registration information. Settlement and registration take place at the same time. | |
| | 4. Interaction for tax info | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S HSG survey 2013. Settlement messages are not used in pass on tax-related information | |
| | 5. T2S schedule of settlement day | Not compliant | G | Straight-forward to implement | 26/09/2016 | 18/09/2017 | ECSD | Info source: T2S and bilateral input and NUG survey 2014. Technical adaptations and amendments to rules and regulations of CSD are required. No barriers identified and detailed plan/roadmap is available for carrying out necessary changes. Full compliance (both technical and legal) will be achieved as of migration to T2S (February 2017). | |
| | Market claims (28 standards) | 43% | G | Technical, market practice and CSD rules | Testing readiness will be achieved in Q4 2016 | 18/09/2017 | MIG | Info source: May 2016 CSD gap analysis update. No changes in primary legislation have been identified and only amendments to the CSD rules will be needed - draft was published in April 2016. Technical implementation and testing of the new functionalities is on schedule for T2S migration. Implementation in the rules of the CSD planned as of the migration to T2S in Q2 2017. | |
| | Transformations (13 standards) | 15% | | | | | | Info source: T2S HSG 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. | |
| | Buyer protection (18 standards) | 0% | B | N/A | N/A | N/A | N/A | Info source: T2S SF III. It is planned that the ECD SSS Rules will be updated to permit full recognition of the (inconditionality, irrevocability and enforceability of the settlement processed on the T2S platform instead of the ECD system) and the relevant amendments will be enforced as of T2S implementation. | |
| | 8. Settlement Finality II: irrevocability and enforceability transfer order | Fully compliant | | | | | | Info source: T2S HSG surveys 2011 and 2012, SP2, HSG 2013 Survey on SF III. | |
| Legal harmonisation | 9. Settlement Finality III: irrevocability of securities transfers. | Not compliant | G | CSD rules change | N/A | 16/09/2017 | ECSD | Info source: T2S HSG survey 2013. It is planned that the ECD SSS Rules will be updated to permit full recognition of the (inconditionality, irrevocability and enforceability of the settlement processed on the T2S platform instead of the ECD system) and the relevant amendments will be enforced as of T2S 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. | |
| Priority 2 | | | | | | | | | |
| T2S account structures | 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. | |
| | 13. Availability of omnibus accounts | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S HSG survey and bilateral input. | |
| | 14. Restrictions on omnibus accounts | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S HSG survey and bilateral input. | |
| | 15. Securities account numbering | Not compliant | G | Straightforward to implement | Testing readiness achieved | 18/09/2017 | ECSD | Info source: IHSG survey on T2S securities account numbering & April 2013. T2S standard will be implemented by migration to T2S. | |
| | 16. Dedicated cash account numbering | Not compliant | G | Straightforward to implement | Testing readiness achieved | 18/09/2017 | Eesti Pank | Info source: IHSG survey on T2S DCA numbering, April-May 2013 | |
| | Activity | Sub-activity | Compliance | Type of implementation gap | Implementation plan/date | | Implementation actor(s) | Relevant national actors for implementation | |
| | 18. Corporate actions | CA market standards (68) | 47% | Y | Regulatory/legislative Change | Testing readiness will be achieved in Q4 2016 | 18/09/2017 | MIG/MG | Info source: BG/E/MIG Survey (Sep 2015). 32 (out of 68) standards already met. |
| | 23. Securities amount static data | | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S HSG 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) | | | |
| | | | | | Fully operational according to the T2S standard | | | | |
| | | | | | Relevant national actors for implementation | | | | |
| Priority 1 | | | | | | | | | |
| 1. T2S ISO 20022 messages | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 18/09/2017 | Iberclear | | | |
| 2. T2S matching fields | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 18/09/2017 | Iberclear | | | |
| 3. Interaction for registration | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 18/09/2017 | Iberclear | | | |
| 4. Interaction for tax info | Fully compliant | B | N/A | N/A | N/A | N/A | | | |
| 5. T2S schedule of settlement day | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 18/09/2017 | Iberclear | | | |
| Market claims (28 standards) | 46% | | Low rank legislative changes/ Technical changes | | | | | | |
| Transformations (13 standards) | 38% | | Major technical change | | | | | | |
| 6. Corporate actions T2S CA standards [59] | 0% | | Manual BP to be implemented | | | | | | |
| Priority 2 | | | | | | | | | |
| 8. Settlement Finality II: irrevocability and enforceability transfer order | Fully compliant | B | N/A | N/A | N/A | N/A | | | |
| 9. Settlement Finality III: irrevocability of securities transfers. | Fully compliant | B | N/A | N/A | N/A | N/A | | | |
| 10. Outsourcing IT (Settlement) services | Fully compliant | B | N/A | N/A | N/A | N/A | | | |
| 12. Settlement cycles | Partly compliant | G | Straight-forward to implement | N/A | Q4 2015 | Competent authority for supervision or trading venues | | | |
| CSD account structures | Fully compliant | B | N/A | N/A | N/A | N/A | | | |
| 14. Restrictions on omnibus accounts | Fully compliant | B | N/A | N/A | N/A | N/A | | | |
| 15. Securities account numbering | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 18/09/2017 | Iberclear | | | |
| T2S accounts numbering | Fully compliant | B | N/A | N/A | N/A | Info source: HSG survey on T2S DCA numbering, April/May 2013. Full compliance in place. | | | |
| Priority 3 | | | | | | | | | |
| 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) | | | |
| | | | | | Fully operational according to the T2S standard | | | | |
| | | | | | Relevant national actors for implementation | | | | |
| 18. Corporate actions | CA market standards [68] | 74% | G | | 18/09/2017 | Iberclear | | | |
| 23. Securities amount static data | | Fully compliant | B | N/A | N/A | N/A | | | |

| 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 |
|-----------------------------------|----------------------------------------------------------------------------|--------------------------|--------|----------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|-------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | | | | If the standard/rules are not yet implemented, please specify what the type of gap is | Ready for T2S testing | | |
| Priority 1 | | | | | | | | |
| T2S messages | 1. T2S ISO 20022 messages | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: NUG response 2015. T2S version of ISO20022 message standard in operation since 1 December 2014. The Finnish market is already using these T2S messages. |
| | 2. T2S matching fields | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: NUG response 2015. T2S mandatory matching fields already in operation since 1 December 2014. The Finnish market is already using the T2S matching fields. |
| | 3. Interaction for registration | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S HSG survey 2013. Settlement messages are not used to transfer registration information. |
| | 4. Interaction for tax info | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S HSG survey 2013. Settlement messages are not used to transfer tax information. |
| | 5. T2S schedule of settlement day | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 18/09/2017 | Euroclear FI | Info source: SP2 and NUG survey 2014. No barriers to implementation. |
| Legal harmonisation | Market claims (28 standards) | 0% | | Straight-forward to implement | | | | Info source: May 2016 CASG gap analysis update. |
| | Transformations (13 standards) | 0% | | Straight-forward to implement | | | | There is a detailed plan to meet the standards by the time of migration in the first wave of T2S. The aim is to implement the market claims and transformations standards in November 2016 and the manual BP standards prior to T2S migration. No technical or regulatory issues remain. |
| | 6. Corporate actions T2S CA standards (59) | 0% | G | Straight-forward to implement | Testing readiness achieved | Q4/2016 | NUG and Euroclear FI | Info source: T2S HSG survey 2013 and 2012. SP2 and bilateral input. Already implemented (Sep 2013). |
| | Buyer protection (18 standards) | | | | | | | Info source: T2S HSG survey and bilateral input. |
| | 8. Settlement Finality I: irrevocability and enforceability transfer order | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: NUG response 2015. 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: T2S HSG survey and bilateral input. |
| | 10. Outsourcing IT ('Settlement') services | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S 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. |
| | 13. Availability of omnibus accounts | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S HSG survey and bilateral input. |
| | 14. Restrictions on omnibus accounts | Not compliant yet | Y | Legal/regulatory | Not available | | National legislator | Info source: T2S HSG survey and bilateral input. From the omnibus account structure. The law covering the issue is currently going through the parliamentary process. |
| CSD account structures | 15. Securities account numbering | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: NUG response 2015. Fully operations since 2 February 2015. |
| | 16. Dedicated cash account numbering | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 18/09/2017 | FINCIB | Info source: HSG survey on T2S DCA numbering. April/May 2013 and further bilateral clarification. FINCIB will open DCA beginning 3rd migration wave. |
| | Sub-activity | Compliance | Status | Type of implementation gap | If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan. | Implementation plan/date | Implementation actor(s) | Relevant actions for implementation |
| | Activity | | | Indicates level of compliance with the relevant standard/rules (Green (G), yellow (Y), red (R)) | If the standard/rules are not yet implemented, please specify what the type of gap is (use the dropdownlist). | Ready for T2S testing | Fully operational according to the T2S standard | Further comments |
| | 18. Corporate actions | CA market standards (68) | 59% | Y | Straight-forward to implement | Testing readiness achieved | Q4/2016 | Euroclear FI |
| 23. Securities amount static data | | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: NUG response 2015. Fully operational since 2 February 2015. |

| 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. Relevant for T2S testing | Implementation actor(s) | Further comments | |
| | | Green (G) yellow (Y) Red (R) Blue (B) Type of gap is: • relevant for the relevant standard/rules • implemented, please specify what is implemented • not yet implemented, please specify what is not yet implemented • fully operational, please indicate to the T2S testing | | Info source: SP2 and bilateral input. French NUG has confirmed plan and dates for full compliance prior to migration to T2S. | | Info source: SP2 and bilateral input. French NUG has confirmed plan and dates for full compliance prior to migration to T2S. | | |
| Priority 1 | | N/A | | N/A | | N/A | | |
| 1. T2S ISO 20022 messages | | Not compliant | | Straight-forward to implement Testing readiness achieved | | 12/09/2016 Euroclear FR | | |
| 2. T2S matching fields | | Not compliant | | Straight-forward to implement Testing readiness achieved | | 12/09/2016 Euroclear FR | | |
| 3. Interaction for registration | | Fully compliant | | N/A | | N/A | | |
| 4. Interaction for tax info | | Fully compliant | | N/A | | N/A | | |
| 5. T2S schedule of settlement day | | Not compliant | | Straight-forward to implement Testing readiness achieved | | 12/09/2016 Euroclear FR | | |
| Market claims (28 standards) | | 4% | | Major technical change Major technical change | | N/A | | |
| Transformations (13 standards) | | 0% | | N/A | | Q4 - 2017 February 2018 FR - MiG | | |
| 6. Corporate actions T2S CA standards (59) | | Buyer protection (18 standards) | | 0% | | Other | | |
| 8. Settlement finality II: irrevocability and enforceability transfer order | | Fully compliant | | N/A | | N/A | | |
| 9. Settlement finality III: irrevocability of securities transfers. | | Not compliant | | CSD rules change | | 12/09/2016 Euroclear FR/Regulator | | |
| 10. Outsourcing IT (Settlement) services | | Fully compliant | | N/A | | N/A | | |
| 12. Settlement cycles | | Fully compliant | | N/A | | N/A | | |
| 13. Availability of omnibus accounts | | Fully compliant | | N/A | | N/A | | |
| CSD account structures | | 14. Restrictions on omnibus accounts | | Not compliant | | Market practice change/Regulation Not available | | |
| T2S accounts numbering | | 15. Securities account numbering | | Not compliant | | Not available Euroclear France | | |
| 16. Dedicated cash account numbering | | Fully compliant | | Straight-forward to implement Testing readiness achieved | | 12/09/2016 Euroclear FR | | |
| Activity | | Compliance | | N/A | | N/A | | |
| 18. Corporate actions | | CA market standards (68) | | Major technical change and legal changes | | Not available FR - MiG | | |
| 23. Securities account static data | | Fully compliant | | N/A | | N/A | | |
| Priority 2 | | | | | | | | |
| 18. Corporate actions | | 72% | | Green (G) yellow (Y) Red (R) Blue (B) Type of gap is: • relevant for the relevant standard/rules • implemented, please specify what is implemented • not yet implemented, please specify what is not yet implemented • fully operational, please indicate to the T2S testing | | Not available Info source: FR NUG | | |
| 23. Securities account static data | | N/A | | N/A | | N/A | | |
| Priority 3 | | | | | | | | |
| 18. Corporate actions | | Green (G) yellow (Y) Red (R) Blue (B) Type of gap is: • relevant for the relevant standard/rules • implemented, please specify what is implemented • not yet implemented, please specify what is not yet implemented • fully operational, please indicate to the T2S testing | | Info source: FR NUG | | Info source: BISGi/E-MiG Survey September 2015; 49 out of 68 standards already met. Final implementation expected with Euroclear launch of Stream 6 - after migration to T2S. | | |
| 23. Securities account static data | | N/A | | N/A | | Info source: T2S NUG survey and bilateral input. Fully compliant with European market practice. | | |

| T2S harmonisation activities: Greece (BOGS) | | | | | | |
|-----------------------------------------------|-------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Activity | Sub-activity | Compliance Indicates level of compliance with the relevant standard(s)/rules Green (G), yellow (Y), red (R), blue (B) of gaps | Status | Type of implementation gap (The standards/rules are not yet implemented, please specify what the type of gap is) | 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 |
| | | | | | 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 |
| | 2. T2S matching fields | Fully compliant | B | N/A | N/A | BOGS |
| | 3. Interaction for registration | Fully compliant | B | N/A | N/A | N/A |
| | 4. Interaction for tax info | Fully compliant | B | N/A | N/A | N/A |
| | 5. T2S schedule of settlement day | Fully compliant | B | N/A | N/A | BOGS/GR-NUG |
| 6. Corporate actions T2S CA standards (59) | Market claims (223 standards) | 100% | B | N/A | N/A | Info source: GR/NUG. Full compliance with all info source: GR/NUG. Full compliance with all relevant T2S CA standards (sovereign debt securities). |
| | Transformations (13 standards) | 100% | B | N/A | N/A | N/A |
| Legal harmonisation | 8. Settlement finality I: irrevocability and enforceability transfer order | Fully compliant | B | N/A | N/A | N/A |
| | 9. Settlement finality III: irrevocability of securities transfers. | Fully compliant | B | N/A | N/A | BOGS |
| | 10. Outsourcing IT {Settlement } services | Fully compliant | B | N/A | N/A | N/A |
| | 12. Settlement cycles | Fully compliant | B | N/A | N/A | N/A |
| | 13. Availability of omnibus accounts | Fully compliant | B | N/A | N/A | N/A |
| CSD account structures | 14. Restrictions on omnibus accounts | Fully compliant | B | N/A | N/A | N/A |
| | 15. Securities account numbering | Fully compliant | B | N/A | N/A | BOGS |
| T2S accounts numbering | 16. Dedicated cash account numbering | Fully compliant | B | N/A | N/A | GR NCB |
| | Sub-activity | Compliance | Status | Type of implementation gap Indicates level of compliance with the relevant standard(s)/rules Green (G), yellow (Y), red (R) | Implementation plan/date If standards/rules are not yet implemented, please specify what the type of gap is (see the dropdown list). | Implementation actor(s) |
| Priority 2 | | | | | | |
| | | | | | | |
| 18. Corporate actions | CA market standards (23) | 100% | B | N/A | N/A | N/A |
| | | | | | | Info source: BSG/E-MIG Survey (Sep 2015), 23 (out of 23 relevant) standards already met. |
| 23. Securities account static data | | | Fully compliant | B | N/A | N/A |
| | | | | | | Info source: GR/NUG. |



| Activity | Sub-activity | Compliance | Status | Type of implementation gap | Implementation plan/date and various milestones/dates in the implementation plan. | | Implementation actor(s) | Further comments |
|--------------------------------------------|----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|---------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | | | | If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan. Ready for T2S testing | Fully compliant according to the T2S standard | | |
| Priority 1 | | | | | | | | |
| T2S messages | 1. T2S ISO 20222 messages | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 06/02/2017 | KELER | Info source: SP2 and bilateral input. Full plan and implementation dates for full compliance prior to migration to T2S are provided. |
| | 2. T2S matching fields | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 06/02/2017 | KELER | Info source: SP2 and bilateral input. Full plan and implementation dates for full compliance prior to migration to T2S are provided. |
| | 3. Interaction for registration | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S NUG 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 NUG surveys 2013. Settlement messages are not used for passing on tax-related information |
| | 5. T2S schedule of settlement day | Not compliant | G | Major technical change | Testing readiness achieved | February 2017 | KELER | Info source: SP2 and bilateral input. NUG Chairperson's response and NUG survey of 2014. CSD rules and procedures need to be amended, but there are no regulatory obstacles to adhering to the T2S settlement day schedule. No technical barriers identified for implementation. Detailed plan available to achieve full compliance before migration to T2S. |
| | Market claims (28 standards) | 4% | G | Regulatory/legislative/ technical change Major technical/ market practice and legal change Market practice and legal change | Testing readiness achieved | 06/02/2017 | KELER, regulator, NUG | Info source: May 2016 CAG gap analysis update. Important changes have been made in the legislation and a plan exists to comply with all standards from a technical perspective by Q3 2016. Consultations are still ongoing with the national authorities and market participants to clarify some open issues, but no obstacles have been identified which threaten full compliance by the time of KELER's migration to T2S. |
| Corporate actions T2S CA Standards (59) | Transformations (13 standards) | 8% | G | CSD rules change | N/A | 06/02/2017 | KELER/ Regulator | Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input and NUG response. However, no legislative changes are required. CSD rules change requires NCB approval. No barriers are foreseen in the procedure to incorporate these changes into the CSD rules. |
| | Buyer protection (18 standards) | 6% | G | CSD rules change | N/A | 06/02/2017 | KELER/ Regulator | Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input. Plans and date provided. However, no legislative changes are required. CSD rules change requires NCB approval. No barriers are foreseen in the procedure to incorporate these changes into the CSD rules. |
| | 8. Settlement Finality I: irrevocability and enforceability transfer order | Not compliant | G | CSD rules change | N/A | 06/02/2017 | KELER/ Regulator | Info source: T2S NUG survey on IT outsourcing. However, no legislative changes are required. CSD rules change requires NCB approval. No barriers are foreseen in the procedure to incorporate these changes into the CSD rules. |
| | 9. Settlement Finality II: irrevocability of securities transfers. | Not compliant | G | CSD rules change | N/A | 06/02/2017 | KELER/ Regulator | Info source: T2S NUG survey on IT outsourcing. However, no legislative changes are required. CSD rules change requires NCB approval. No barriers are foreseen in the procedure to incorporate these changes into the CSD rules. |
| | 10. Outsourcing II (Settlement) services | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: 2014 NUG 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 NUG survey and bilateral input. No barriers identified. |
| | 15. Securities account numbering | Not compliant | G | Straight-forward to implement. | Testing readiness achieved | 06/02/2017 | Keller | Info source: NUG survey on T2S securities account numbering. April-May 2013. No barriers identified preventing full compliance before migration to T2S. |
| | 16. Dedicated cash account numbering | N/A | N/A | Type of implementation gap | Implementation plan/date and various milestones/dates in the implementation plan. | N/A | N/A | At the moment, the Hungarian NCB does not plan to open DCAs in T2S |
| Priority 2 | | | | | | | | |
| T2S accounts numbering | Sub-activity | Compliance | Status | Type of implementation gap | If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan. | | Implementation actor(s) | Further comments |
| | Activity | Indicates level of compliance with the relevant standards/rules Green (G), yellow (Y), red (R) | Indicates level of compliance with the relevant standards/rules Green (G), yellow (Y), red (R) | # If the standards/rules are not yet implemented, please specify what the type of gap is (just the dropdown list). | Fully operational according to the T2S standard | Ready for T2S testing | Relevant national actors for implementation | |
| 18. Corporate actions | CA market standards (68) | 25% | R | Technical change and market practice change for some standards | Testing readiness achieved | 06/02/2017 | KELER | Info source: BSG/E-NUG Survey (Sep 2015). 17 out of 68 standards already met. |
| 23. Securities amount static data | Fully compliant | B | N/A | N/A | N/A | N/A | N/A | Info source: T2S NUG survey and bilateral input. Full compliance with the EU standard. |

| Activity | Sub-activity | Compliance | Status | Type of implementation gap | Implementation plan/date and various milestones/dates in the implementation plan. | | Implementation actor(s) | Further comments |
|-------------------------------------------------------------------------|------------------|------------------------|-----------------|----------------------------|-----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | | | | If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan. | Ready for T2S testing | | |
| Priority 1 | | | | | | | | |
| 1. T2S ISO 20022 messages | Fully compliant | B | N/A | 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 | 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 | 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 | 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 | Fully compliant | B | N/A | N/A | N/A | N/A | N/A | Info source: IT NUG. Full compliance with the T2S schedule. |
| Market claims (28 standards) | 93% | Market practice change | | Q3/Q4 - 2016 | December 2016 | Monte Titoli and IT NUG | Info source: May 2016 CAGB base analysis update. Compliance gaps in market claim standard and transformations standard 3 (i.e. non-generation of market claims, transformations for OTC transactions) as well as market claim standard 23 regarding the lack of provision on a user-friendly facility for settling entitlements underlying & transactions. IT NUG plan for full compliance with all the standards by the end of 2016. | Info source: May 2016 CAGB base analysis update. Compliance gaps in market claim standard and transformations standard 3 (i.e. non-generation of market claims, transformations for OTC transactions) as well as market claim standard 23 regarding the lack of provision on a user-friendly facility for settling entitlements underlying & transactions. IT NUG plan for full compliance with all the standards by the end of 2016. |
| Transformations (13 standards) | 92% | Market practice change | | | | | | |
| 6. Corporate actions T2S CA standards [59] | 100% | R - Dec 2015 | Other | Q3/Q4 - 2016 | December 2016 | Monte Titoli and IT NUG | Info source: T2S HSG survey on IT outsourcing. Fully compliant with T2S FII rule. | Info source: T2S HSG survey on IT outsourcing. Fully compliant with T2S FII rule. |
| Buyer protection (18 standards) | Buyer protection | | Fully compliant | | | | | |
| 8. Settlement Finality II: irrevocability of transfer order enforcement | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S NUG surveys 2011 and 2012. SP2 and bilateral input. | 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 | | | | | |
| 10. Outsourcing IT (Settlement) services | Fully compliant | B | N/A | N/A | N/A | N/A | N/A | Info source: IT NUG. Full compliance with T2S FII rule. |
| 12. Settlement cycles | Fully compliant | B | N/A | N/A | N/A | N/A | N/A | Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014. |
| 13. Availability of omnibus accounts | Fully compliant | B | N/A | N/A | N/A | N/A | N/A | Info source: T2S HSG survey and bilateral input. No barriers identified. |
| 14. Restrictions on omnibus accounts | Fully compliant | B | N/A | N/A | N/A | N/A | N/A | Info source: T2S HSG survey and bilateral input. No barriers identified. |
| 15. Securities account numbering | Fully compliant | B | N/A | 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 | N/A | Info source: T2S HSG survey on T2S DCA numbering. April-May 2013. Bidi already complies fully with T2S standard. |
| Priority 2 | | | | | | | | |
| Activity | | Compliance | Status | Type of implementation gap | Implementation plan/date and various milestones/dates in the implementation plan. | | Implementation actor(s) | Relevant national actor for implementation |
| 18. Corporate actions CA market standards [68] | 100% | B | N/A | N/A | Ready for T2S testing | Fully operational according to the T2S standard | N/A | N/A |
| 23. Securities amount static data | Fully compliant | B | N/A | 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 and various milestones/dates in the implementation plan. | | Implementation actor(s) | Further comments |
| | | | | | If standards/rules are not yet implemented, please specify which type of gap(s) | Ready for T2S testing | | |
| Priority 1 | | | | | | | | |
| T2S messages | 1. T2S ISO 20022 messages | Not-compliant | G | Straightforward to implement | Testing readiness achieved | 18-Sep-17 | LCVPD | Info source: SP2 and bilateral input; New IT system for LCVPD. Plans and dates for full compliance before migration to T2S have been provided. |
| | 2. T2S matching fields | Not-compliant | G | Straightforward to implement | Testing readiness achieved | 18-Sep-17 | LCVPD | Info source: SP2 and bilateral input; New IT system for LCVPD. Plans and dates for full compliance before migration to T2S have been provided. |
| | 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 HS2 surveys 2013. Settlement messages are not used to transmit tax-related information. |
| | 5. T2S schedule of settlement day | Not-compliant | G | Technical adaptations and CSD rule change | 26/09/2016 | 18-Sep-17 | LCVPD | Info source: SP2 and bilateral input and NUG survey, plan and dates provided. No barriers identified. |
| | Market claims (28 standards) | 0% | G | Regulatory/Legislative Change | Testing readiness will be achieved in Q4 2016 | 18/09/17 | LCVPD | Info source: May 2016 CAG gap analysis update. All necessary changes to CSD rules, as well as activation of new technical functionalities, will take effect as of migration to T2S (September 2017). |
| Legal harmonisation | Transformations (13 standards) | 0% | G | Regulatory/Legislative Change | New draft CSD rules were submitted for regulatory approval at the beginning of 2016. No legal/regulatory barrier identified. | | LCVPD | Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input and NUG Chairperson's response. |
| | Buyer protection (18 standards) | 0% | G | CSD rules change | N/A | 18-Sep-17 | LCVPD | 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 barrier identified. |
| | 8. Settlement Finality I: irrevocability and enforceability transfer order | Not-compliant | G | CSD rules change | N/A | 18-Sep-17 | LCVPD | Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input and NUG Chairperson's response. Info source: Bilateral confirmation from NUG. |
| | 9. Settlement Finality III: irrevocability of securities transfers. | Not-compliant | B | N/A | N/A | N/A | N/A | Info source: 2014 HS2 survey on IT outsourcing. Info source: T2S NUG survey and bilateral input. No barriers identified. |
| | 10. Outsourcing IT (Settlement) services | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: 2014 HS2 survey on IT outsourcing. Info source: T2S NUG survey and bilateral input. No barriers identified. |
| | 12. Settlement cycles | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S NUG survey and bilateral input. No barriers identified. |
| CSD account structures | 13. Availability of omnibus accounts | Fully compliant | B | N/A | N/A | N/A | LCVPD | Info source: HS2 survey on T2S securities account numbering. April-May 2013. Compliance with the T2S standard will be achieved with the implementation of the new CSD system. Plans and dates have been provided. |
| | 14. Restrictions on omnibus accounts | Fully compliant | B | N/A | N/A | N/A | LCVPD | Info source: HS2 survey on T2S securities account numbering. April-May 2013. Compliance with the T2S standard will be achieved with the implementation of the new CSD system. Plans and dates have been provided. |
| | 15. Securities account numbering | Not-compliant | G | Straightforward to implement. No issues for seen | Testing readiness achieved | 18-Sep-17 | Bank of Lithuania | Info source: HS2 survey on T2S DCA numbering, April-May 2013. Plan and dates have been provided. The work is progressing according to plan, no delays foreseen. |
| | 16. Dedicated cash account numbering | Not-compliant | G | Straightforward to implement | Testing readiness achieved | 18-Sep-17 | | |
| | Priority 2 | | | | | | | |
| | Activity | Sub-activity | Compliance | Status | Type of implementation gap | Implementation plan/date and various milestones/dates in the implementation plan. | Implementation actor(s) | Further comments |
| 18. Corporate actions | CA market standards (68) | 31% | R | Green (G), yellow (Y), red (R) | If standards/rules are not yet implemented, please specify which type of gap(s) use the dropdown list. | Testing readiness will be achieved in Q 4 2016 | LCVPD | Info source: ISS/E-MIG Survey (Sep 2015), 21 (out of 68) standards already met |
| | 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 WU standard. |

| T2S harmonisation activities: LUX CSD | | | | | | | | |
|-----------------------------------------------------------------------------|--------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|----------------------------|-----------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|
| Activity | Sub-activity | Compliance | Status | Type of implementation gap | If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan. | Implementation plan/date | Implementation actor(s) | Further comments |
| | | Indicates level of compliance with the relevant standards/rules Green (G), yellow (Y), and blue (B) indicate what type of gap is implemented, please specify what the type of gap is | | | Ready for T2S testing | Fully operational according to the T2S standard | Relevant national actions for implementation | |
| Priority 1 | | | | | | | | |
| 1. T2S ISO 20022 messages | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 06/02/2017 | LUX CSD | Info source: SP2 and bilateral input. | |
| 2. T2S matching fields | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 06/02/2017 | LUX CSD | Info source: SP2 and bilateral input. LUX CSD confirmed that there are no issues with full compliance with T2S mandatory matching fields. | |
| 3. Interaction for registration | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S NUG surveys 2013, Registration messages. | |
| 4. Interaction for tax info | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S NUG surveys 2013, Tax information is not transferred via settlement messages. | |
| 5. T2S schedule of settlement day | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 06/02/2017 | LUX CSD | Info source: SP2 and bilateral input. No issues foreseen in complying with T2S standards. | |
| Market claims (28 standards) | 54% | G | Straight-forward to implement | | | | Info source: May 2016 CASG gap analysis update. | |
| Transformations (13 standards) | 0% | G | Straight-forward to implement | | | | LUX NUG has confirmed that only a change in market practice would be necessary. The standards will be adopted fully with the migration of LuxCSD to T2S. | |
| Buyer protection (18 standards) | 94% | G | Straight-forward to implement | | | | | |
| 8. Settlement Finality II: irrevocability and enforceability transfer order | Not compliant | G | Regulatory/legislative change | N/A | 06/02/2017 | LUX CSD | Info source: T2S NUG surveys 2011 and 2012, SP2 and bilateral input. Lux CSD will follow CBF instruction cancellation process. | |
| 9. Settlement Finality III: irreversibility of securities transfers. | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: Survey on T2S settlement finally rule III and NUG response. Still 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: Bilateral confirmation from NUG. | |
| 12. Settlement cycles | Fully compliant | B | N/A | N/A | N/A | N/A | Fully compliant since 6 October 2014. | |
| CSD account structures | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S NUG survey and bilateral input. | |
| 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: Bilateral confirmation from NUG. | |
| 15. Securities account numbering | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 06/02/2017 | LUX CSD | Info source: Survey on T2S securities account numbering, April-May 2013 | |
| T2S accounts 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) | Not available | R - No info | Other | Not available | Not available | LUX CSD | Info source: Information on Lux CSD compliance was not made available in the September 2015 E-MIG survey. |
| 23. Securities amount static data | | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S NUG survey and bilateral input. |

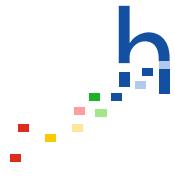


| T2S harmonisation activities: VP LUX | | | | | | | | |
|--------------------------------------|-----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Activity | Sub-activity | Compliance | Status | Type of implementation gap Indicates level of compliance with the relevant standard/fields: Green (G), yellow (Y), red (R), blue (B) Implementation plan: specify what type of gap is ready for T2S testing | Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan. | | Implementation actor(s) Relevant institutional actors for implementation | Further comments |
| | | | | | Ready for T2S testing | Fully operational according to the T2S standard | | |
| Priority 1 | | | | | | | | |
| T2S messages | 1. T2S ISO 20022 messages | Not compliant | G | Straight-forward to implement | Testing readiness achieved | September 2016 | VP Lux | Info source: SP2 and bilateral input. VP is planning to use the T2S ISO 20022 standard for information management services in line with UDFs. |
| | 2. T2S matching fields | Not compliant | G | Major technical change | Testing readiness achieved | September 2016 | VP Lux | 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 | VP Lux | Info source: T2S HS2 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 | VP Lux | Info source: T2S HS2 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 | Not compliant | G | Major technical change | Testing readiness achieved | September 2016 | VP Lux | Info source: SP2 and bilateral input and NUG response. Plans and dates for full implementation have been provided. General concern about the End Of Day reporting and Start Of Day time period. |
| | 6. Corporate actions T2S CA standards [59] | Market claim (28 standards) Transformations (13 standards) Buyer protection (18 standards) | 21% 15% 0% | G | Market practice | Testing readiness achieved | September 2016 | VP Lux Info source: May 2016 CAS gap analysis update. VP Lux has committed to fully comply with the T2S CA standards prior to its migration to T2S (Sept 2016). As part of its plan, VP Lux will offer an automated CA detection service to its participants. The service will be ready for community testing prior to migration of VP Lux to T2S. |
| Legal harmonisation | 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: Survey on T2S settlement finality rule III and NUG response. Still 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 HS2 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. |
| | 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 | G | System changes | Testing readiness achieved | September 2016 | VP Lux | Info source: HS2 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. BC1 has fully complied since migration wave 1. |
| | Sub-activity | | Compliance | Status | Type of implementation gap Indicates level of compliance with the relevant standard/fields | Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan. | Implementation actor(s) Relevant institutional actors for implementation | Further comments |
| | Activity | | | | Green (G), yellow (Y), red (R) | If standards/rules are not yet implemented, describe by what type of gap (see the drop-down list) | | |
| | 18. Corporate actions | CA market standards (68) | | Not available | R - No info | Other | Not available | VP Lux Info source: Information on VP Lux compliance was not made available in the September 2015 E-MIG survey. |
| | 23. Securities amount static data | Fully compliant | | B | N/A | N/A | N/A | Info source: T2S NUG survey and bilateral input. |
| Priority 2 | | | | | | | | |
| 19. Securities amounts | Securities amounts (10) | | Not available | Ready for T2S testing | Fully operational according to the T2S standard | | | |

| T2S harmonisation activities: Latvia | | | | | | | |
|-----------------------------------------------|-----------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|---------------|-----------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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) | | | Ready for T2S testing | Relevant actions for implementation | |
| | | | | | | | Source: bilateral input and quarterly self-assessment. Plans to comply fully by migration date. |
| T2S messages | 1. T2S ISO 20022 messages | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 18-Sep-17 | Latvia CSD |
| | 2. T2S matching fields | Not compliant | G | Market practice | Testing readiness achieved | 18-Sep-17 | Latvia CSD |
| | 3. Interaction for registration | Fully compliant | B | N/A | N/A | N/A | Source: XMAP Survey 2015 and further bilateral classification from the NUG on adaptation of initial register transactions according to T2S matching specifications. |
| | 4. Interaction for tax info | Fully compliant | B | N/A | N/A | N/A | Source: bilateral input. Registration information is not passed on through settlement messages. |
| | 5. T2S schedule of settlement day | Not compliant | G | Major technical change | 26-Sep-16 | 18-Sep-17 | Latvia CSD |
| 6. Corporate actions T2S CA standards (59) | Market claims (28 standards) | 0% | G | Regulatory/legislative change | Testing readiness will be achieved in Q4 2016 | 18-Sep-17 | Latvia CSD |
| | Transformations (13 standards) | 0% | | Regulatory/legislative change | N/A | 18-Sep-17 | |
| Legal harmonisation | 8. Settlement Finality II: irrevocability and enforceability transfer order | Not compliant | G | Regulatory/legislative change | N/A | 18-Sep-17 | Latvia CSD |
| | 9. Settlement Finality III: irrevocability of securities transfers. | Not compliant | G | Straight-forward to implement | N/A | 18-Sep-17 | Latvia CSD/FSA |
| CSD account structures | 10. Outsourcing IT (Settlement) services | Fully compliant | B | N/A | N/A | N/A | Source: EFIN survey and bilateral input. CSD rules update. Full compliance with the standards is planned to be finalised at the time of migration to T2S in September 2017. |
| | 12. Settlement cycles | Fully compliant | B | N/A | N/A | N/A | Source: EFIN survey and bilateral input. CSD rules amendment and regulatory approval will take place before migration to T2S. However, no barriers to compliance have been identified. |
| T2S accounts numbering | 13. Availability of omnibus accounts | Fully compliant | B | N/A | N/A | N/A | Source: LV NUG. Info source: LV NUG survey on IT outsourcing. |
| | 14. Restrictions on omnibus accounts | Fully compliant | B | N/A | N/A | N/A | Source: LV NUG. There are no restrictions rules regarding omnibus accounts in the Latvian CSD. |
| | 15. Securities account numbering | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 18-Sep-17 | Latvia CSD |
| | 16. Dedicated cash account numbering | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 18-Sep-17 | Latvia CB |
| Activity | Sub-activity | Compliance | Status | Type of implementation gap If the standards/rules are not yet implemented, please specify what the type of gap is (use the dropdown list). | Implementation plan/date If standards/rules are not fulfilled, please provide the timetable and fully operational according to the T2S standard | Implementation actor(s) | Relevant actions for implementation |
| | | | | | | | Priority 2 |
| 18. Corporate actions | CA market standards (68) | 82% | G | Major technical change | Testing readiness will be achieved in Q4 2016 | 18-Sep-17 | Latvia CSD |
| 23. Securities amount static data | | | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 18-Sep-17 |
| | | | | | | | Source: LV NUG and quarterly self assessment. |
| | | | | | | | Info source: BG/E/MIG Survey (September 2015). 56 (out of 68) standards already met. Some of the standards will require CSD rule changes for implementation. |

| Activity | Sub-activity | Compliance <small>(Indicates level of compliance with the relevant standards/rules: Green (G), yellow (Y), red (R), blue (B))</small> | Status | Type of implementation gap <small>If the standards/rules are not yet implemented, please specify what the type of gap is</small> | Implementation plan/date and various milestones/dates in the implementation plan. | | Implementation actor(s) <small>Relevant external actors for implementation</small> | Further comments |
|-----------------------------------------------|-----------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------|-----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|-------------------------------------------------|---------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | | | | Ready for T2S testing | Fully operational according to the T2S standard | | |
| Priority 1 | | | | | | | | |
| T2S messages | 1. T2S ISO 20022 messages | Fully compliant | B | N/A | N/A | N/A | MSE | Info source: MT NUG. T2S ISO messages in operation. |
| | 2. T2S matching fields | Fully compliant | B | N/A | N/A | N/A | MSE | 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 | Fully compliant | B | N/A | N/A | N/A | Malta CSD / Stock Exchange | Info source: MT NUG. T2S schedule of settlement day in production. |
| 6. Corporate actions T2S CA standards [59] | Market claims (28 standards) | 100% | B | N/A | N/A | N/A | MSE | Info source: May 2016 CASG gap analysis update. As of 16 December 2015, the Maltese market has achieved full compliance with the T2S CA standards. |
| | Transformations (13 standards) | 100% | B | N/A | N/A | N/A | MSE | Info source: Confirmation from the NUG received post-migration to T2S. |
| | Buyer protection (18 standards) | 100% | B | N/A | N/A | N/A | N/A | Info source: Confirmation from the NUG received post-migration to T2S. |
| Legal harmonisation | 8. Settlement Finality II: irrevocability and enforceability transfer order | Fully compliant | B | N/A | N/A | N/A | MSE | 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 | N/A | N/A | MSE | Info source: MT NUG. CSD rules in line with T2S SF III. |
| CSD account structures | 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. |
| T2S accounts numbering | 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 | MSE | 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 | | | | | | | | |
| Activity | Sub-activity | Compliance <small>(Indicates level of compliance with the relevant standards/rules: Green (G), yellow (Y), red (R), blue (B))</small> | Status | Type of implementation gap <small>If the standards/rules are not yet implemented, please specify what the type of gap is (use the dropdown list).</small> | Implementation plan/date and various milestones/dates in the implementation plan. | | Implementation actor(s) <small>Relevant external actors for implementation</small> | Further comments |
| | | | | | Ready for T2S testing | Fully operational according to the T2S standard | | |
| 18. Corporate actions | CA market standards (68) | 82% | G | Other | Testing readiness achieved | Not available | MSE | Info source: BSG/E-MiC Survey (Sep 2015). 56 (out of 68) standards already met |
| 23. Securities amount static data | | | Fully compliant | B | N/A | N/A | N/A | Info source: T2S NUG survey and bilateral input. |

| 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 | T2S harmonisation activities: the Netherlands | | |
|-----------------------------------|----------------------------------------------------------------------------|-----------------|--------|---------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|------------------------------------------|
| | | | | | | | | After standard has been implemented, please specify when the type of gap is ready for T2S testing | Ready for T2S testing | Newer national actors for implementation |
| Priority 1 | | | | | | | | | | |
| T2S messages | 1. T2S ISO 20022 messages | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 12/09/2016 | Eurodear NL | Info source: SP2 and bilateral input. Plans and dates for full compliance have been provided. | | |
| | 2. T2S matching fields | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 12/09/2016 | Eurodear NL | 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 survey 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 survey 2013. Settlement messages are not used to transmit tax-related information. | | |
| | 5. T2S schedule of settlement day | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 12/09/2016 | Eurodear NL | Info source: SP2 and bilateral input. The ESG operational day will be amended to cope with the timing of T2S. T2S accounting day will be considered the master day. | | |
| | Market claims (28 standards) Transformations (13 standards) | 43% | B | Major technical change | | | | Info source: May 2016 CAGS gap analysis update and further NUG clarification. Eurodear Nederland plans to achieve compliance with only some (mid)market claims (CA standards by the time of its migration to T2S in September 2016. However, it will not comply with the transformations and day correction standards by this time. Regarding the date for achieving full compliance with all T2S CA standards, the milestones shared with the market are publication of the Detailed Service Description in Q4 2016 with client testing in Q4 2017 or achieving full compliance in February 2018. | | |
| Legal harmonisation | Buyer protection (18 standards) | 0% | | Major technical change | | | | Info source: T2S HSG gap analysis update and further NUG clarify. Eurodear NL already complies with bilateral cancellation after matching. | | |
| | 6. Corporate actions T2S CA standards (55) | R - Feb 2018 | Other | | | Q4 - 2017 | February 2018 | Info source: T2S HSG survey 2013 and 2012, SP2 and bilateral input. Stevens targets towards to achieve compliance based on the ESG set-up. Regulatory approval is required but no obstacles have been identified. | | |
| | 8. Settlement Finality I: irrevocability and enforceability transfer order | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S HSG survey 2013 and 2012, SP2 and bilateral input. Stevens targets towards to achieve compliance based on the ESG set-up. Regulatory approval is required but no obstacles have been identified. | | |
| | 9. Settlement Finality III: irrevocability of securities transfers. | Not compliant | G | Straight-forward to implement | | | | Info source: T2S HSG survey 2013 and 2012, SP2 and bilateral input. Stevens targets towards to achieve compliance based on the ESG set-up. Regulatory approval is required but no obstacles have been identified. | | |
| | 10. Outsourcing IT [Settlement] services | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: 2014 HS G 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 1 October 2014. | | |
| CSD account structures | 13. Availability of omnibus accounts | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S HSG survey and bilateral input. There are no issues with omnibus accounts availability for the SIS countries. | | |
| | 14. Restrictions on omnibus accounts | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S HSG survey and bilateral input. | | |
| T2S accounts numbering | 15. Securities account numbering | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 12/09/2016 | Eurodear NL | Info source: HS G 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: List of cash and securities side DCPs is published by DCPG and further confirmation from the NUG. | | |
| Priority 2 | | | | | | | | | | |
| 18. Corporate actions | Cx market standards (68) | 75% | G | Major technical change and market practice change | Not available | Not available | Eurodear | Info source: ISCG/E-MiF5 survey [Sep 2015]. 51 (out of 68) standards already met. | | |
| 23. Securities amount static data | | Full compliant | B | N/A | N/A | N/A | N/A | Info source: T2S HSG survey and bilateral input. There are no issues with securities amount data for the ESS countries. | | |



| T2S harmonisation activities: Portugal (Interbosia) | | | | | | | | | |
|-----------------------------------------------------|--------------------------------------------------------------------------------|----------------------------------------------------------------------|----------------------------------------------------------|-----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------|------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| 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 | |
| | | | | | If the standard/rules are not yet implemented, please specify what the type of gaps 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 | Interbosia | Info source: SP2 and bilateral input and quarterly status gathering templates. | |
| | 2. T2S matching fields | Fully compliant | B | N/A | N/A | N/A | Interbosia | 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 survey 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 survey 2013 and further bilateral clarifications. Tax-related information is not passed on when sending settlement instructions. | |
| | 5. T2S schedule of settlement day | Fully compliant | B | N/A | N/A | N/A | n/a | Info source: SP2 and bilateral input and T2S HUG survey. Adaptations are ongoing to meet the T2S schedule and conditions by migration to T2S. No barrier identified. However, there is concern regarding the short amount of time between the EOD and the beginning of NTIS to process and send to T2S the corporate actions instructions. | |
| Legal harmonisation | Market claims (28 standards) Transformations (13 standards) | 100% | R - Nov 2016 | N/A | N/A | Testing readiness achieved | Monday, 14 November 16 | Info source: May 2016 CASG gap analysis update and bilateral input from PT NUG. Full compliance by the Portuguese market will be achieved on 14 November 2016. | |
| | Buyer protection (18 standards) | 100% | | N/A | Key date information to be inserted into MT564 messages | | | Info source: PT NUG. Full compliance with T2S F II rule. | |
| | 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 F III 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 F 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 Fully compliant since 6 October 2014. | |
| CSD account structures | 11. Settlement cycles | Fully compliant | B | N/A | N/A | N/A | n/a | Info source: T2S NUG survey and bilateral input. Omnibus accounts are available. | |
| | 13. Availability of omnibus accounts | Fully compliant | B | N/A | N/A | N/A | n/a | Info source: Bilateral confirmation from NUG. Fully compliant since 6 October 2014. | |
| | 14. Restrictions on 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. | |
| | 15. Securities account numbering | Fully compliant | B | N/A | N/A | N/A | n/a | Info source: HSG survey (Feb 2015). There are no restrictions on the omnibus accounts that need to be propagated down the settlement chain. | |
| | 16. Dedicated cash account numbering | Fully compliant | B | N/A | N/A | N/A | n/a | Info source: T2S securities account numbering, April-May 2013. Implementation will coincide with system adaptation to T2S. | |
| Priority 2 | | | | | | | | | |
| T2S accounts numbering | 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 | |
| | Activity | Indicates level of compliance with the relevant standard/rules | Green (G), yellow (Y), red (R), blue (B) (if gaps) | Green (G), yellow (Y), red (R) | Ready for T2S testing | Fully operational according to the T2S standard | Relevant national actors for implementation | Info source: BSG/E-NUG Survey (Sep 2015). G2 (out of 683 standards already) met Info source: T2S NUG. Full compliance following migration. | |
| 18. Corporate actions | CA market standards (68) | Fully compliant | B | N/A | N/A | N/A | n/a | Info source: BSG/E-NUG Survey (Sep 2015). G2 (out of 683 standards already) met Info source: T2S NUG. Full compliance following migration. | |
| 23. Securities amount static data | | Fully compliant | B | N/A | N/A | N/A | n/a | Info source: BSG/E-NUG Survey (Sep 2015). G2 (out of 683 standards already) met Info source: T2S NUG. Full compliance following migration. | |

| Activity | Sub-activity | Implementation plan/date | | | | Implementation actor(s) | Further comments |
|-----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------|----------------------------|-----------------------------------------------------------------------------------------------------------------------------|-----------------------|-------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| | | Status | Type of implementation gap | If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan. | Ready for T2S testing | | |
| T2S harmonisation activities: Romania | | | | | | | |
| | | Indicates level of compliance with the relevant standards/Actives | | | | | |
| | | Green (G), yellow (Y), red (R), blue (B) or grey (N) | | | | | |
| | | If the standard/rule is not fully implemented, please specify when the type of gap is (use the dropdown list 1) | | | | | |
| Priority 1 | | | | | | | |
| 1. T2S ISO 20022 messages | Fully compliant | B | N/A | N/A | 22/06/2015 | DC | Info source: Confirmation from the NUG received post-migration to T2S. |
| 2. T2S matching fields | Fully compliant | B | N/A | N/A | 22/06/2015 | DC | Info source: Confirmation from the NUG received post-migration to T2S. |
| 3. Interaction for registration | Fully compliant | B | N/A | N/A | 22/06/2015 | 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 | 22/06/2015 | N/A | Info source: Confirmation from the NUG received post-migration to T2S. |
| 5. T2S schedule of settlement day | Fully compliant | B | N/A | N/A | 22/06/2015 | CSD/NCB | Info source: Confirmation from the NUG received post-migration to T2S. |
| 6. Corporate actions T2S CA standards (59) | Market claims (28 standards) Transformations (13 standards) Buyer protection (18 standards) | 0% | R - Feb 2017 | Market Practice Regulatory/legislative change Technical | 31 October 2016 | February 2017 | Info source: May 2016 CASG gap analysis update. The Romanian market was not fully compliant with the T2S CA standards by its migration to T2S. The Romanian market provided an updated implementation plan at the end of October 2015 for achieving full compliance as per the original plan, i.e. February 2017. |
| 8. Settlement Finality II: irrevocability and enforceability transfer order | Fully compliant | B | N/A | N/A | 22/06/2015 | 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 | 22/06/2015 | CSD | Info source: Confirmation from the NUG received post-migration to T2S. |
| 10. Outsourcing IT (Settlement) services | Fully compliant | B | N/A | N/A | 22/06/2015 | N/A | Info source: Confirmation from the NUG received post-migration to T2S. |
| 12. Settlement cycles | Fully compliant | B | N/A | N/A | 22/06/2015 | 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 | 22/06/2015 | N/A |
| | 14. Restrictions on omnibus accounts | Fully compliant | B | N/A | N/A | 22/06/2015 | N/A |
| T2S accounts numbering | 15. Securities account numbering | Fully compliant | B | N/A | N/A | 22/06/2015 | CSD |
| | 16. Dedicated cash account numbering | Fully compliant | B | N/A | N/A | 22/06/2015 | Banca Națională a României |
| Priority 2 | | | | | | | |
| | | Indicates level of compliance with the relevant standards/Actives | | | | | |
| | | Green (G), yellow (Y), red (R) | | | | | |
| | | If the standard/rule is not yet implemented, please specify when the type of gap is (use the dropdown list 1) | | | | | |
| 18. Corporate actions | CA market standards (68) | 60% | Y | Market practice as well as regulatory changes | 31 October 2016 | 01/02/2017 | CSD, Regulator, NCB 41 (out of 68) standards already met. |
| 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. |



| Activity | Sub-activity | Compliance | Status | Type of implementation gap If standards/rules are not yet implemented, please specify what type (Y, red; R, blue; B) of gaps | 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 |
|----------------------------------------------------------------------------|---------------------------------|------------|-----------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------|
| | | | | | Ready for T2S testing | Fully operational according to the T2S standard | | |
| Priority 1 | | | | | | | | |
| 1. T2S ISO 20022 messages | Not compliant | G | Technical change | Testing readiness achieved | 01/02/2017 | CDCP | Info source: SP2 and bilateral input, Q2 2013 status gathering template. CDCP will offer its members communication in line with T2S ISO 20022 standards for selected CDCP services. | Relevant national actors for implementation |
| 2. T2S matching fields | Not compliant | R? | Market practice change | Not available | Not available | CDCP | Info source: XWAP 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's a mandatory matching field. The impact of non-compliance of the SK market with this standard was assessed in March 2016. There is no plan for the Sk market to achieve full compliance. | |
| 3. Interaction for registration | Not compliant | G | Technical change | Testing readiness achieved | 01/02/2017 | CDCP | Info source: T2S ISG surveys 2013, 2014. Adaptation to the new practice will result from implementation of ISO20022 messaging standard. | |
| 4. Interaction for tax info | Fully compliant | B | N/A | N/A | N/A | N/A | Info source: T2S ISG surveys 2013, 2014. Settlement messages are not used for transmission of tax information. | |
| 5. T2S schedule of settlement day | Not compliant | G | Market practice change | Testing readiness achieved | 01/02/2017 | CDCP | Info source: SP2/SP3 and bilateral input and NUG survey, Plan for compilation before migration with the T2S schedule and calendar. | |
| Market claims (28 standards) Transformations (13 standards) | 0% | 0% | | | | | Info source: May 2016 CASG gap analysis update and bilateral input from SK NUG. CDCP has prepared the necessary proposals for changes to its Rules of Operation, which will be submitted to the regulators in time to be adopted before migration to T2S. The necessary technological changes to its information systems (in the testing system) were implemented at the end of 2015. The Slovakian market is aware of the CDCP's plans and no obstacles have been identified to their implementation, although community testing of CAS processing is expected to begin only when at least the draft updated Rules of Operation become available – expected in September 2016. | |
| 6. Corporate actions T2S CA standards (59) | Buyer protection (13 standards) | G | Market practice /technical change /CSD rules change | 01/04/2016 | 01/02/2017 | CDCP | Info source: Status gathering template and NUG Chairperson's response. No legislative changes are required based on the updated legal analysis. The change required is part of business requirements for reshaping the internal IT system and there are no barriers to implementation. | |
| Legal harmonisation | | | | | | | | |
| 8 Settlement Finality II: irrevocability and enforceability transfer order | Not compliant | G | Technical change | N/A | 01/02/2017 | CDCP | Info source: Status gathering template and NUG Chairperson's response. No requirement for any legislative changes. The change required is part of business requirements for reshaping the internal IT system and there are no barriers to implementation. | |
| 9 Settlement Finality III: irrevocability of securities transfers. | Not compliant | G | Technical change | N/A | 01/02/2017 | CDCP | Info source: Status gathering template and NUG Chairperson's response. No requirement for any legislative changes. The change required is part of business requirements for reshaping the internal IT system and there are no barriers to implementation. | |



| | | | | | | | | | |
|------------------------|------------------------------------------|-------------------|------------|------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| | 10. Outsourcing IT (Settlement) services | Fully compliant | B | N/A | N/A | N/A | N/A | N/A | Info source: 2014 HS G 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 | 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 | N/A | Info source: T2S NUG survey and bilateral input. |
| | 14. Restrictions on omnibus accounts | Not compliant | Y | legislative change | N/A | 01/02/2017 | CDCP | Info source: T2S NUG survey, bilateral input, SP3 feasibility assessment, Q2 2013 status gathering templates and NUG response; restrictions on SK investors when CDCP acts as investor CSD. The CDCP is currently finalising a thorough, updated legal analysis for the adaptation of DDCP to T2S. | |
| T2S accounts numbering | 15. Securities account numbering | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 01/02/2017 | CDCP | National bank of Slovakia | Info source: HS G survey on T2S securities account numbering, April-May 2013 |
| | 16. Dedicated cash account numbering | Not compliant | G | Straight-forward to implement | Testing readiness achieved | 01/02/2017 | CDCP | National bank of Slovakia | Info source: HS G survey on T2S DCA numbering, April-May 2013. NCB plans full compliance. Dates are provided. |
| Activity | | Sub-activity | Compliance | Status | Type of implementation gap <small>Green (G), yellow (Y), red (R) If the standards/rules are not yet implemented, please specify what the type of gap is (use the dropdown list).</small> | Implementation plan/date <small>If standards/rules are not fulfilled, please provide the timetable and various milestones/dates in the implementation plan.</small> | Implementation actor(s) <small>Relevant national actors for implementation</small> | Further comments | |
| Priority 2 | | | | | | | | | |
| 18. Corporate actions | CA market standards (68) | 19% | R | Changes in the CSD rules, market practice changes and IT changes | Not available | Not available | SK market, CDCP, regulators (approval of amended DDCP rules) | Info source: HS G/E-MIG Survey (Sep 2015). 13 (out of 68) standards already met. Based on the Slovakian Progress Report submitted after the autumn 2015 E-MIG workshop (on 29 February 2016). | |
| | 23. Securities amount static data | Not compliant yet | G | Market practice change/ Technical change / legislative change | Testing readiness achieved | 01/02/2017 | CDCP | Info source: T2S NUG input. Legislative change has already taken place. | |

Abbreviations

Countries (covered in the report)

| | |
|----------------|----------------|
| AT Austria | IT Italy |
| BE Belgium | LT Lithuania |
| CH Switzerland | LU Luxembourg |
| DE Germany | LV Latvia |
| DK Denmark | MT Malta |
| EE Estonia | NL Netherlands |
| ES Spain | PT Portugal |
| FI Finland | RO Romania |
| FR France | SI Slovenia |
| GR Greece | SK Slovakia |
| HU Hungary | |

Others

| | |
|-------|--------------------------------------------|
| AG | Advisory Group |
| CA | Corporate Actions |
| CAJWG | Corporate Actions Joint Working Group |
| CASG | Corporate Actions Sub-Group |
| CSD | Central Securities Depository |
| CSDR | CSD Regulation |
| E-MIG | European Market Implementation Group |
| ESMA | European Securities and Markets Authority |
| NCB | national central bank |
| NUG | T2S National User Group |
| SF1 | Settlement Finality 1 |
| XMAP | T2S Cross-border market practice sub-group |



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