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GROUPEMENT EUROPEEN DES BANQUES COOPERATIVES  
EUROPÄISCHE VEREINIGUNG DER GENOSSENSCHAFTSBANKEN*

## European Credit Sector Associations

# **Dismantling Giovannini Barrier 3: The European harmonisation of rules relating to corporate actions processing**

Implementation status report

October 2009

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## **Executive Summary**

The European Credit Sector Associations (ECSAs) – the European Banking Federation (EBF), the European Savings Banks Group (ESBG) and the European Association of Co-operative Banks (EACB) – are providing this report as part of their commitment to coordinate and monitor private sector actions to improve efficiency in European domestic and cross-border corporate actions in order to dismantle the third barrier identified by the Giovannini Group.

15 countries provided their implementation status to the ECSAs. Those comprise Austria, Belgium, Denmark, Estonia, Finland, France, Germany, Greece, Italy, the Netherlands, Portugal, Spain, Sweden, Switzerland and the United Kingdom. The mentioned countries cover by far the largest share of securities transactions in Europe. The ECSAs will continue to actively promote the standards within their membership with the final goal of implementing them in all member states of the European Union, the European Economic Area and Switzerland.

The overall status of the implementation is very positive: 60% of the standards is already implemented. Of the remaining issues the largest part is dependent on legal barriers in the single countries – which require changes in local law – as well as on major infrastructure projects like TARGET2-Securities (T2S) or the Euroclear Single Platform (SP). There are furthermore close links to other parties of the chain (issuers, stock exchanges). The elaborated set of market standards leads to changes in local market practices and to sometimes very costly system enhancements. The ECSAs are anyhow confident that the issues reported by the national MIGs can be solved. The dates mentioned for implementation in this report are not beyond 2010 with the exception of those ones linked to major projects like T2S or SP.

The ECSAs will further actively promote and monitor the implementation of the markets standards on corporate actions processing in order to reach a full European harmonization of rules in this area. The ECSAs realise that all stakeholders have their role to play in this process at European and national level and are aiming to broaden and deepen the involvement of national implementation groups in this process.

# **1. Introduction**

## **1.1 Financial integration in Europe**

Financial integration is considered by European legislators, regulators and supervisors as one of the key elements for ensuring the stability of the financial system in the European Union. The European Central Bank considers the market for a given set of financial instruments or services to be fully integrated “*when all potential participants in such a market (i) are subject to a single set of rules when deciding to buy or sell those financial instruments or services, (ii) have equal access to this set of financial instruments or services, and (iii) are treated equally when they operate in the market.*”<sup>1</sup> For the European Commission financial integration is defined according to the law of one price: “*If markets are integrated, financial assets which have identical characteristics should exhibit the same price - irrespective of their geographical origin. In other words, an asset's price should be driven by factors other than the place where it is traded or the geographic location of the two contractors.*”<sup>2</sup>

## **1.2 Clearing & Settlement initiatives in the EU**

The creation of an integrated securities market in the EU is one of the main goals of European legislators given the increased investor demand for foreign securities within the European Union since the introduction of the Euro and the gradual integration of the European capital markets. Post-trading arrangements thereby constitute the point of convergence of all aspects of the life of securities and inefficiencies in this area can have serious consequences. The cost of clearing and settlement (direct and indirect) is an important component of the overall cost of a securities transaction. Due to a very fragmented post-trading infrastructure cross-border investments are considerably more expensive than investments in the home country of an EU citizen.

Against this background numerous initiatives have been launched on a European level that lead to tremendous progress in terms of securities markets integration in general and a clearing and settlement harmonization in particular: The Markets in Financial Instruments Directive (MiFID) provides – with respect to post-trading – three basic rights: the remote access to CCPs and CSDs for banks and investment firms, the choice of CCP and CSD for trading venues and the (conditional) choice of settlement venues for banks and investment firms.<sup>3</sup> The Code of Conduct on Clearing and Settlement<sup>4</sup>

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<sup>1</sup> European Central Bank (2008), Financial Integration in Europe, p. 6, <http://www.ecb.int/pub/pdf/other/financialintegrationineurope200804en.pdf>

<sup>2</sup> European Commission (2009), European Financial Integration Report 2008, p. 7, [http://ec.europa.eu/internal\\_market/finances/docs/cross-sector/fin-integration/efir\\_report\\_2008\\_en.pdf](http://ec.europa.eu/internal_market/finances/docs/cross-sector/fin-integration/efir_report_2008_en.pdf)

<sup>3</sup> Markets in Financial Instruments Directive (MiFID), 2004/39/EC, [http://eur-lex.europa.eu/LexUriServ/site/en/com/2005/com2005\\_0253en01.pdf](http://eur-lex.europa.eu/LexUriServ/site/en/com/2005/com2005_0253en01.pdf)

provides guidelines for establishing links between market infrastructures (both at horizontal and vertical level) and contains also measures targeting price transparency as well as services unbundling and account separation. The ESCB/CESR recommendations aim at improving the safety and soundness of securities settlement systems.<sup>5</sup> The TARGET2-Securities project of the European Central Bank is aimed at creating a single platform for the settlement of securities in central bank money.<sup>6</sup>

### 1.3 The Giovannini Barriers

One of the major initiatives concerning the harmonization of the European post-trading landscape was the establishment of the Giovannini Group in 1996 by the European Commission which should advise it on EU cross-border clearing and settlement arrangements.

In a first report – published in November 2001 – the Giovannini group came to the conclusion that the fragmentation in the EU clearing and settlement infrastructure “*complicates significantly the post-trade processing of cross-border securities transactions relative to domestic transactions (...) whereby differences in technical requirements/market practices, tax regimes and legal systems act as effective barriers to the efficient delivery of clearing and settlement services. The extent of the inefficiency that is created by these barriers is reflected in higher costs to pan-EU investors and is inconsistent with the objective of creating a truly integrated EU financial system.*”<sup>7</sup>

The mentioned barriers – also known as the Giovannini barriers – were specified in a second report that was issued by the Giovannini group in April 2003. The group outlined 15 technical, legal and fiscal barriers identified as the source of the problems and highlighted strategies for dismantling them.<sup>8</sup>

## 2. Dismantling of Giovannini Barrier 3

The third barrier covers differences between EU member states in the rules governing corporate actions comprising a broad range of topics, with an impact beyond pure settlement problems. The first aspect of the problem is the variety of rules, information requirements and deadlines for corporate actions. A second aspect of this barrier relates to rules or laws governing securities markets. Differences exist as to the moment when a purchaser is

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<sup>4</sup> Federation of European Securities Exchanges / European Association of Central Counterparty Clearing Houses / European Central Securities Depositories Association (2006), European Code of Conduct for Clearing and Settlement, [http://www.fese.be/lib/files/European\\_Code\\_of\\_Conduct\\_for\\_Clearing\\_and\\_Settlement.pdf](http://www.fese.be/lib/files/European_Code_of_Conduct_for_Clearing_and_Settlement.pdf)

<sup>5</sup> European System of Central Banks / Committee of European Securities Regulators (2009), Recommendations for securities settlement systems and recommendations for central counterparties in the European Union, [http://www.ecb.int/pub/pdf/other/pr090623\\_escb-cesr\\_recommendationsen.pdf?91abb7e93d7a50dcb2acf3c7bfe629f1](http://www.ecb.int/pub/pdf/other/pr090623_escb-cesr_recommendationsen.pdf?91abb7e93d7a50dcb2acf3c7bfe629f1)

<sup>6</sup> European Central Bank, TARGET2-Securities, <http://www.ecb.de/paym/t2s/about/why/html/index.en.html>

<sup>7</sup> The Giovannini Group (2001), Cross-Border clearing and settlement arrangements in the European Union, p. ii, [http://ec.europa.eu/internal\\_market/financial-markets/docs/clearing/first\\_giovannini\\_report\\_en.pdf](http://ec.europa.eu/internal_market/financial-markets/docs/clearing/first_giovannini_report_en.pdf)

<sup>8</sup> The Giovannini Group (2003), Second Report on EU Clearing and Settlement Arrangements”, p. i – ii, [http://ec.europa.eu/internal\\_market/financial-markets/docs/clearing/second\\_giovannini\\_report\\_en.pdf](http://ec.europa.eu/internal_market/financial-markets/docs/clearing/second_giovannini_report_en.pdf)

treated as having become the owner of a security for the purposes of corporate actions (e.g. on trade date, intended settlement date, or actual settlement date).

## 2.1 Establishment of the CAJWG

The European Credit Sector Associations (ECSAs) – comprising the European Banking Federation (EBF), the European Savings Banks Group (ESBG) and the European Association of Co-operative Banks (EACB) – and the European Central Securities Depositories Association (ECSDA) have been made responsible for leading the process of the removal of Giovannini Barrier 3. Since 2004 they have been – together with other associations representing the securities industry such as the European Issuers and the European Securities Service Forum (ESSF) – working together on a series of markets standards aimed at harmonizing the most common corporate action processes including distributions, reorganizations and transaction management.

In summer 2007 individual work of associations on the removal of Giovannini Barrier 3 was replaced by the establishment of the Corporate Actions Joint Working Group (CAJWG). Securities experts from all main relevant stakeholders, i.e. intermediaries, issuers and market infrastructures, joined forces to elaborate a single set of market standards for the operational processing of all categories of corporate actions with the exception of general meetings.<sup>9</sup>

## 2.2 The market standards on corporate actions

The members of the CAJWG in the end agreed on basic principles – taking into account the work already performed in the individual work of the associations – that should reflect future best market practices and that should dismantle the operational parts of Giovannini Barrier 3 with respect to the categories of corporate actions addressed once they would be implemented. The elaborated standards are structured the following way:

- **Distributions:**
  - Cash distributions
  - Securities distributions
  - Distributions with Options
  
- **Reorganisations:**
  - Mandatory Reorganisations with Options
  - Mandatory Reorganisations
  - Voluntary Reorganisations

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<sup>9</sup> Specifically on general meetings there was the set up of the Joint Working Group on General Meetings (JWGGM).



- **Transaction Management:**

- Market Claims
- Transformations
- Buyer Protections

The scope of application of the proposed market standards includes all types of the afore mentioned categories of Corporate Actions (Distributions and Reorganisations), all securities deposited and settled in Book Entry form with an (I)CSD in Europe and additionally all parties involved, i.e. Issuers, market infrastructures (trading, clearing and settlement), Intermediaries and End Investors. The exception is for standards for transaction management which are directed at market infrastructures and Intermediaries only.

The subject matter of the standards concerns the information flow throughout the chain of relevant parties, key dates and their sequence, and the operational processing of Corporate Actions. It is important to note that within the standards entitlements are determined based on the actual settled position in the Issuer (I)CSD's books on Record Date, whereas Intermediaries may calculate based on a contractual settlement basis on Ex Date.

The standards elaborated by the CAJWG were subject to a market consultation in the end of 2008. The revised standards<sup>10</sup> were presented for endorsement by the involved associations: European Issuers, European Central Securities Depositories Association (ECSDA), European Association of Clearing Houses (EACH), Federation of European securities Exchanges (FESE), European Banking Federation (EBF), European Association of Cooperative Banks (EACB), European Savings Banks Group (ESBG), European Securities Services Forum (ESSF/SIFMA).

### **3. Gap analysis and implementation plans**

#### **3.1 Approach**

The ECSAs have committed to coordinating private sector actions to improve processing efficiency in European domestic and cross-border corporate actions. In order to monitor and to review the progress achieved in the pursuit of the implementation of the standards the ECSAs organise a workshop for national coordinators which is carried out on a regular basis.

National coordinators are members and appointed contact persons of the national Market Implementation Groups (MIGs). The MIGs evaluate the existing situation in the national markets, compare it to the standards, identify what needs to be done in order to comply with the standards, what are the obstacles and how to remove them, who should be involved and take the lead in the work to be performed. The MIGs provide the ECSAs on an annual basis with the implementation status of each standard in their countries. This report

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<sup>10</sup> The full set of Market Standards for Corporate Actions Processing can be found in the annex of this report (p. 128).



summarizes the state of play of the implementation of the market standards on corporate actions for the fourth quarter of 2009 and is the result of a workshop organised by the ECSAs for the national coordinators on the 08 and 09 October 2009 in Brussels.

The implementation status of the single standards reported by the MIGs was structured into five categories:

- Implemented (green)
- In progress (yellow)
- Not implemented (red)
- Not applicable (white)
- No response

“*In progress*” is understood as not yet implemented, but with a clear short to mid term timeline for the implementation. On the contrary, “*not implemented*” stands for major issues with no clear timeline to overcome those (e.g. legal gaps). “*Not applicable*” was used for processes that do not exist in single countries (e.g. buyer protection).

### 3.2 General remarks

- Overall picture

Standards Overview

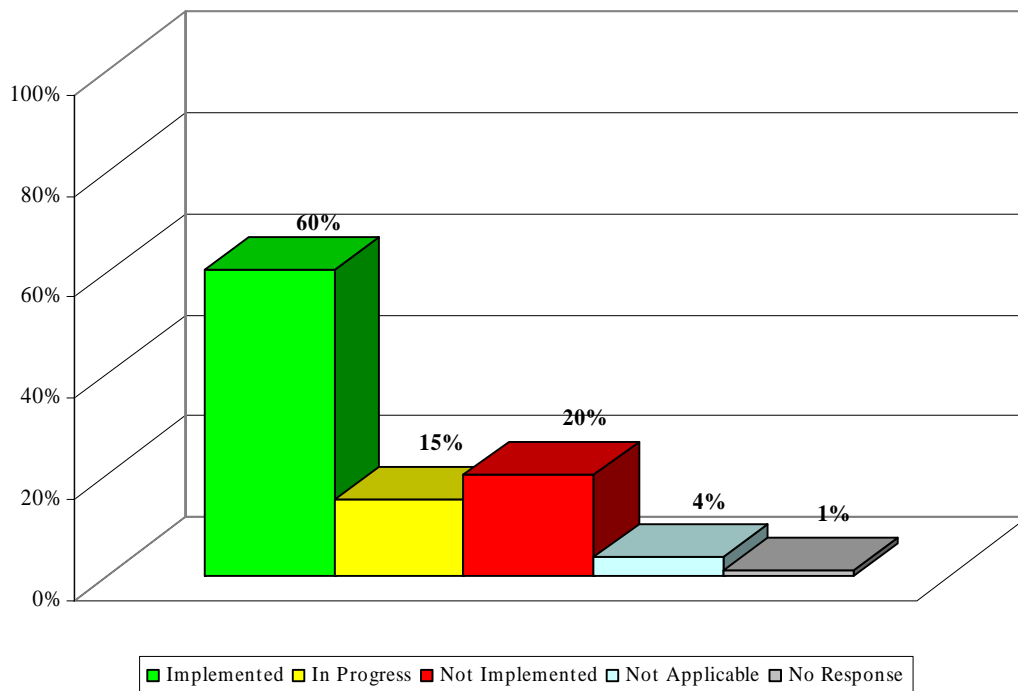


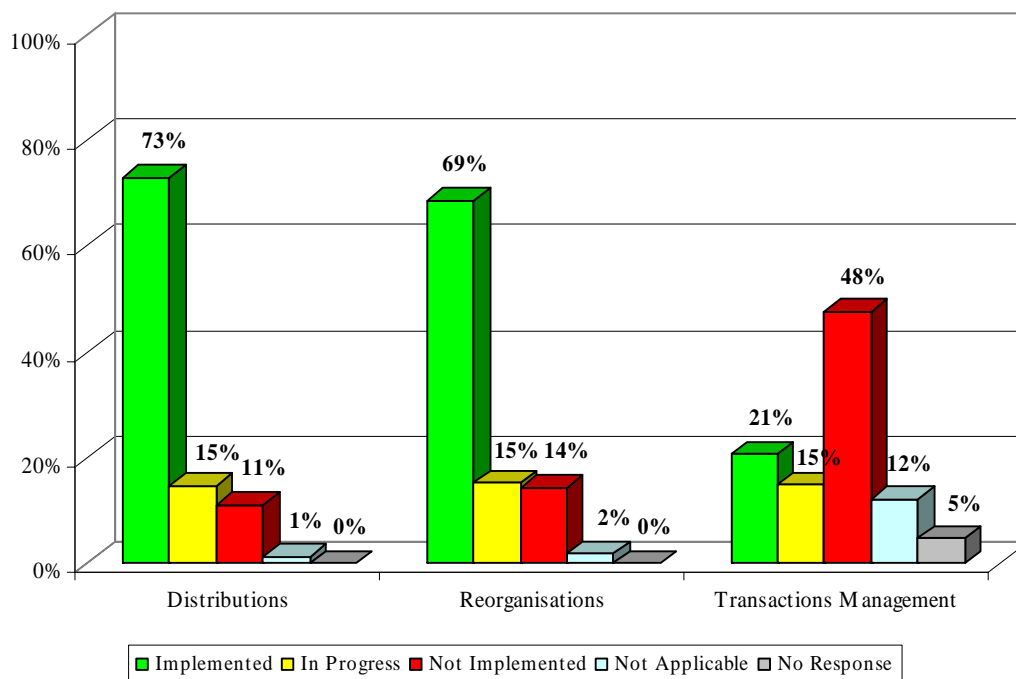
Figure 1: Overview implementation status of all standards

In general the status of the implementation in the single member states is very positive. The feedback received from 15 countries – coming from Austria,

Belgium, Denmark, Estonia, Finland, France, Germany, Greece, Italy, the Netherlands, Portugal, Spain, Sweden, Switzerland and the United Kingdom – shows that 60% of the market standards can be considered as implemented (see figure 1). The MIGs marked 15% as “in progress” and 20% as “not implemented”. 4% if the market standards were labelled as “not applicable” in the respective markets. For 1% of the standards the ECSAs did not receive a response.

There are major differences across the three different parts of the market standards (see figure 2). While distributions (73%) and reorganisations (69%) have a high percentage of already implemented standards, in the transaction management part the majority of standards (48%) is not yet implemented. This can partly be explained by the specific case of Buyer Protection (see 3.2.6).

**Category Overview**



**Figure 2:** Overview structured by standard category

The following paragraphs explain some of the major issues the MIGs reported to the ECSAs. This part is followed by the detailed standard by standard status of each member state.

- **Dependencies on securities infrastructures changes and plans**

Numerous comments from the MIGs make reference to dependencies of the implementation status of single standards with major long-term securities infrastructure projects. In most cases the MIGs refer to the Single Platform development of Euroclear or to the TARGET2-Securities project of the European Central Bank. In those cases the standards count as implemented

as soon as the initiatives have their go lives. Until then they are marked as “in progress” in the status report.

- **Dependencies on other parts of the chain**

The MIGs highlighted that some standards are not yet implemented because of dependencies on other parts of the chain. This comprises for instance certain flows of information coming from the issuer/issuer agent, the stock exchange or the CSD. The respective parts in the report were marked by the MIGs as “in progress” or “not implemented” according to the status of the agreements made between the involved parties.

- **Changes in local market practices**

Keeping in mind that national rules on corporate actions are in place and working for a long time in the single member states, the now elaborated market standards – understood as best practices – lead in some cases to significant changes in the local market practices. The MIGs – including all involved parties in the chain – are working on adapting the new practices. The more complex ones will take more time to be implemented and are marked as “in progress”.

- **Legal barriers**

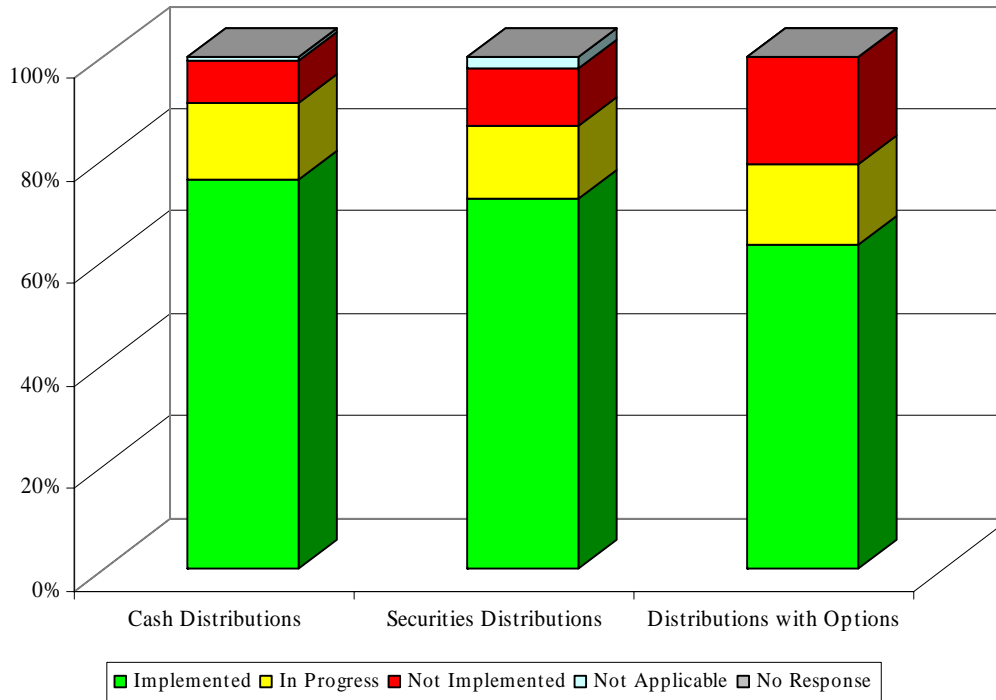
In some cases the implementation is hampered in countries which require changes in national law.

- **Buyer Protection**

The market standards for Buyer Protection are not in place in most member states. The CAJWG acknowledged the fact that there are other means of warranting buyer protection than an institutionalised service provided by market infrastructures organisations. Nevertheless it should be the goal for the MIGs to apply with standards 1 – 4 on Buyer Protection which describe the generic essence but not necessarily the detailed form and instruments for ensuring the respective procedures.

### 3.3 Market Standards on distributions

#### 3.3.1 Overall status



**Figure 3:** Overall status market standards on distributions

The market standards on distributions have a very high percentage of already implemented standards. For Cash Distributions 76% of the the standards are implemented. 15% are still in progress, while 8% are not yet implemented.

There is a similar picture for Securities Distributions: 72% are already implemented, 14% are marked as “in progress” and 12% are not yet implemented.

63% of the market standards on Distributions with Options are implemented. 21% are still labelled as “not implemented” and 16% are in progress.

In the following paragraphs you can see the detailed replies received from the single countries with respect to Distributions.

### 3.3.2 Cash distributions

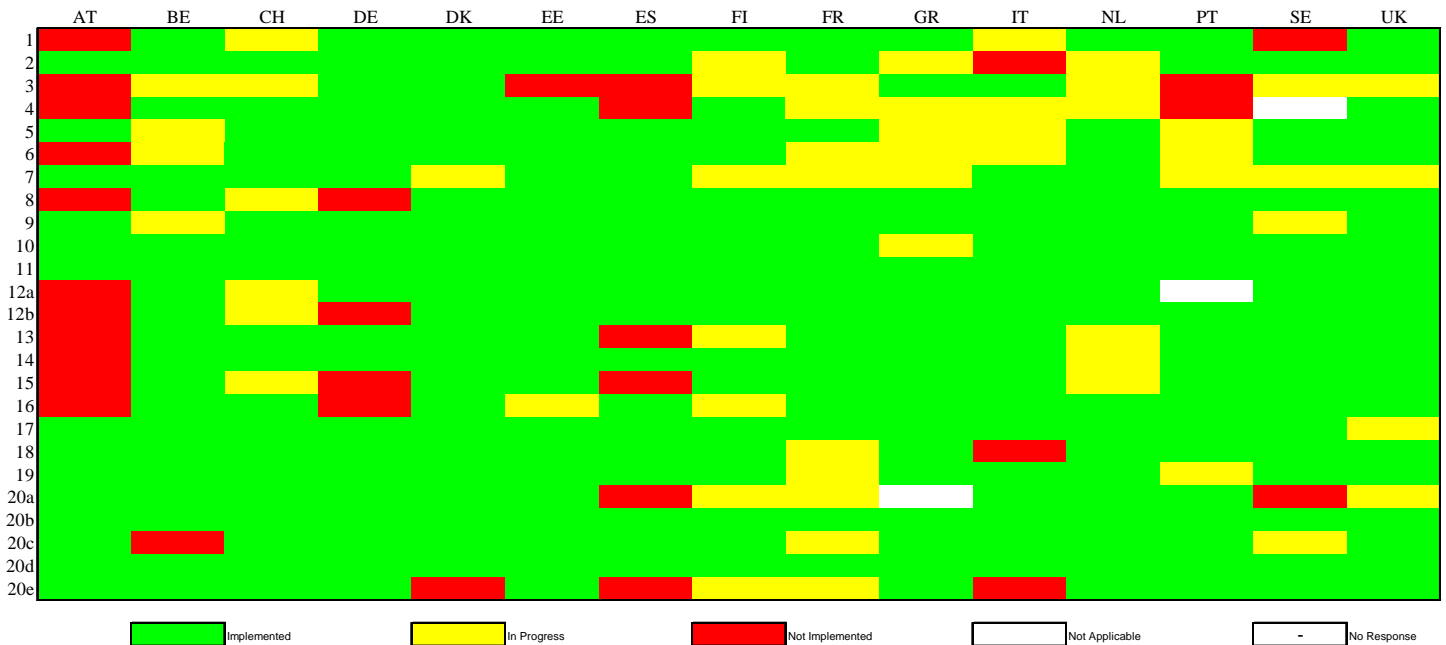


Figure 4: Overview Cash Distributions

#### Standard 1

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. There is no legal basis for a direct announcement process between issuer or issuer's agent and the CSD.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented	It is not compulsory by law, but it is strongly recommended by Good Practices of Corporate Events. Good Practices of Corporate Events are a set of guidelines and recommended rules that all commercial undertakings, whose securities have been registered in the Estonian Central Register of Securities (ECSD), must comply with.	
Finland	Implemented	In Finland data content is not equal to standard and time schedule is more flexible	
France	Implemented		
Germany	Implemented	No guaranteed information from Issuer to (I)CSD. Central publication via data vendor Wertpapier-Mitteilungen. Equivalent market practice to get the standard	Market practice.
Greece	Implemented		
Italy	In Progress	Record date is implicit and is calculated by reference to the ex date and payment date	We are going to explicitate the record in Issuer announcement and include RD in the CA announcement
Netherlands	Implemented		
Portugal	Implemented	According to Interbolsa's rules all issuers must advise Interbolsa of any corporate	

		action within 15 days in advance. As a result, Interbolsa knows the event before its announcement to the market.	
Spain	Implemented		
Sweden	Not Implemented	Most issuers wait until later. Otherwise we comply.	Discuss with stock exchange and/or issuer representatives.
Switzerland	In Progress	Flow to (I)CSD not synchronised with public announcement	Dividends Nov 09, Rest 2010/11
United Kingdom	Implemented		

### Standard 2

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	The announcement of the next applicable rate is made with a separate announcement.	
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented	It is so in case of securities tradable on a regulated market, but it is not compulsory for others.	
Finland	In Progress	Payment date is confirmed, but next applicable rate is not announced (at all)	
France	Implemented		
Germany	Implemented	No guaranteed information from Issuer to (I)CSD. Central publication via data vendor Wertpapier-Mitteilungen. Equivalent market practice to get the standard	Market practice.
Greece	In Progress	For Corporate Bonds the Issuer does not undertake payable rate confirmation announcements	Within 2010
Italy	Not Implemented	Confirmation of payment date and the floating rate applicable to the next coupon payment is given by the Issuer in only one message	From Monte Titoli's perspective, it is of no importance to receive one or more messages for the communication of such data (to be discussed with industry)+F16
Netherlands	In Progress	In particular cases, confirmation and announcement are not separated	Separation to be advocated in "Agentenoverleg", Role for CSD to enforce compliance. Major improvements by 2009 Q4
Portugal	Implemented	According to the existing market practices, the Payment Date confirmation and the announcement of the next applicable rate with reference to the applicable period for that new rate is always made in two separate announcements.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 3

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. There is no legal basis for a direct announcement process between issuer or issuer's agent and the CSD. Currently there is no ISO 15022/20022 standards for issuer-CSD communication available, only issuers-agent (bank) ought to communicate with the CSD.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.

Belgium	In Progress -	EOC partially OK	EOC implementation end 2010 (SP Custody launch). NBB time to be confirmed
Denmark	Implemented	Domestically we use a proprietary format containing the same information as the ISO standard	
Estonia	Not Implemented	The issuer informs ECSD of corporate events by filling out the application form specified by ECSD which is available at the website of ECSD.	
Finland	In Progress	NCSD/APK provides an applicable webservice only for dividends	
France	In Progress - Market at least 50% compliant	The current issuer CSD format is a proprietary format. This will be enhanced with the implementation of SP Custody	Linked to SP Custody (ESES EUI) delivery
Germany	Implemented	Issuers generally inform via WM, onward communication from CSD to market participants is electronic. Communication in electronic format from Issuer to WM not guaranteed. Potential Quality GAP	Market practice.
Greece	Implemented	A web-based proprietary system (HERMES) is used for all information that issuers announce to the Exchange and CSD.	
Italy	Implemented	Mt-X is the main communication channel for the relation of issuers vis à vis Monte Titoli. Therefore, we are compliant because of the use of formatted electronic forms, but the information flow is not an ISO standard	This issue is of no importance for Monte Titoli since all Italian issuers participating to Monte Titoli have adapted to the format in use.
Netherlands	In Progress	Various messages vary in timeliness, content and completeness	A uniform formular will be designed for use in different situations between different players in the chain. Major improvements by 2009 Q4
Portugal	Not Implemented	The information received by Interbolsa from issuers is not sent electronically.	Not planned
Spain	Not Implemented	Iberclear is analysing the possibility of implementing the ISO message that it is being developed by SWIFT 20022. Standard messages for Corporate Actions are not available in ISO 15022	High level
Sweden	In Progress	The communication is done in formatted form via a web interface, but not in ISO standards. The format and content will support ISO messages further down the chain to the intermediaries.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	In Progress	Currently fax / e-mail	Dividends Nov 09, Rest 2010/11
United Kingdom	In Progress	Introduced alongside implementation of the Euroclear Single Platform Custody development	Q4 2010

#### Standard 4

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. There is no legal basis for a direct announcement process between issuer or issuer's agent and the CSD. Currently there is no need for a translation into English by law. The narrative text in the information should be at least in	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.



		english whether or not a international shareholder base exists.	
Belgium	Implemented		
Denmark	Implemented	Today, it is not required that corporate action announcements are delivered together with a translation into English. However, as regards information from public listed companies, translations into English are delivered in estimated 80-90 percent of all announcements.	
Estonia	Implemented	According to clause 2.4.5 of the section "Requirements to issuers" of the Rules of Procedure of the Tallinn Stock Exchange, all stock market releases and financial reports must be made public both in the Estonian and English language. In case of corporate actions of those issuers whose securities are not tradable on a regulated market, there is no such direct legal obligation, but, if possible, it is recommended to add a summary in English about the event.	
Finland	Implemented	some issuers do not provide narrative in English	
France	In Progress - Market at least 80% compliant	This item is not an issue in terms of system enhancement but a matter of practices. It is fully dependent on the ability of an issuer to provide this information in english. This is mainly the case today but few exceptions may still remain. Implementation shall be seen then only as a matter of practices evolution for these remaining exceptional cases. Moreover, even if the CAJWG has issued operationnal standards, a legal aspect may be raised in case of litigation on the translated document toward the original one issued in local language.	2013 (T2S Milestone)
Germany	In Progress	The companies which are listed in the DAX and M-DAX announce in German and English.	Market practice is German language. No change foreseen. Legislation is required and an estimated implementation date cannot be provided at this time.
Greece	In Progress	Only issuers of "big cap" market segment publish a summary in English. For "small cap" issuers is possible but not obligatory	Within 2010
Italy	In Progress	A moral suasion has to be made in order to convince all issuers, having an international shareholder base, to provide narrative in English,	To be implemented
Netherlands	In Progress		A uniform formular will be designed for use in different situations between different players in the chain. Major improvements by 2009 Q4
Portugal	Not Implemented	Currently, the announcements are only provided in Portuguese. Note: sometimes the announcements disclosed by CMVM are in English and in Portuguese.	Not planned
Spain	Not Implemented	Only some issuers already translate into English their announcements. Legal Barrier. There is not any spanish law that envisages this obligation.	High level. Legal Barrier

Sweden	N/A	Narrative is not used in the communication of cash distributions to the CSD.	
Switzerland	Implemented	Correct assessment difficult, information about shareholder base not available	
United Kingdom	Implemented		

### Standard 5

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	The standard is met if information about pending transaction is requested via a service level agreement or in the general terms and conditions.	
Belgium	In Progress	EOC/NBB partially OK - but no for pending transactions	EOC implementation end 2010 (SP Custody launch). NBB T2S 2013
Denmark	Implemented		
Estonia	Implemented	Information is made available on the corporate actions web-page of the Estonian CSD and distributed to its participants via SWIFT or email by ISO standard messages.	
Finland	Implemented	currently such information is provided to all NCSD/APK participants	
France	Implemented		
Germany	Implemented		Market practice.
Greece	In Progress	CSD publishes all announcements without undue delay of receipt by the issuer in its website without addressing the information exclusively to participants	Within 2010 (only to participants who have a direct holding)
Italy	In Progress	For coupon payments no CA information is provided to participants, other than payment pre-advice messages. Only RNI msg MT 721 is sent push to all participants, independently on the fact they have a balance or a pending transaction of the ISIN affected by the CA. MT-X users have the chance to receive also msg. MT 721 pull till the RD.	To be implemented
Netherlands	Implemented		
Portugal	In Progress	The information related to quantities and provisional amounts to be paid is only disclosed to participants with account positions. Currently, this information is not communicated to the participants who have pending transactions.	Not planned
Spain	Implemented		
Sweden	Implemented	The Corporate Actions information system from the CSD, SI, sends all information to all SI subscribers	
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 6

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	EOC partially OK - not for new transactions NBB implemented	EOC implementation end 2010 (SP Custody launch)
Denmark	Implemented		

Estonia	Implemented	Information is made available on the corporate actions web-page of the Estonian CSD and distributed to its participants via SWIFT or email by ISO standard messages.	
Finland	Implemented	currently such information is provided to all NCSD/APK participants	
France	In Progress - Market at least 50% compliant	This requirement is currently met in "SLAB" system but not in all the ESES scope.	Linked to SP Custody (ESES EUI) delivery
Germany	Implemented		Market practice.
Greece	In Progress		Within 2010
Italy	In Progress	For coupon payments no CA information is provided to participants, other than payment pre-advice messages. Only RNI msg MT 721 is sent push to all participants, independently on the fact they have a balance or a pending transaction of the ISIN affected by the CA. MT-X users have the chance to receive also msg. MT 721 pull till the RD.	To be implemented
Netherlands	Implemented		
Portugal	In Progress	This communication is made to any participant who obtains a new holding but not to pending transactions (see answer to standard 5).	Not planned
Spain	Implemented		
Sweden	Implemented	The Corporate Actions information system from the CSD, SI, sends all information to all SI subscribers	
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 7

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	In Progress	VP and relevant domestic market participants are working on a proposal for solutions to the mentioned standards as a consequence of the fact that the infrastructure on the Danish market does not fully comply with the standard. Solutions for the standard are processed jointly and are included as elements in the development of a new announcement infrastructure. The proposals will probably require change of domestic rules and regulations.	
Estonia	Implemented		
Finland	In Progress	By default information is currently provided in free-text format. Proprietary information delivery is available at extra cost..	
France	In Progress - Market at least 50% compliant	The current issuer CSD format is a proprietary format. This will be enhanced with the implementation of SP Custody	Linked to SP Custody (ESES EUI) delivery
Germany	Implemented	(I)CSD informed via different channels to its participants (choice of the participants):SWIFT notification, Online GUI, File transfer	Market practice.
Greece	In Progress		Within 2010
Italy	Implemented	depending on users choice	

Netherlands	Implemented		
Portugal	In Progress	Interbolsa's communication with its participants is done electronically using a proprietary communication protocol.	Not planned
Spain	Implemented	The Information is communicated in formatted electronic form, but not in ISO standards. Iberclear is analysing with the market participants the possibility of implementing the MT564 message for the information distribution.	
Sweden	In Progress	Proprietary interface	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Implemented		
United Kingdom	In Progress	Introduced alongside implementation of the Euroclear Single Platform Custody development	Q4 2010

### Standard 8

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	The Issuer (I)CSD announces the reason of the reversal with the reversal of a payment.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented	This case is marginal in France	
Germany	Not Implemented		no development planned yet. Estimated implementation date cannot be provided at this time.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented	Information would be sent to all concerned parties. Process for cash: Issuers need to ask each custodian/bank to reverse the payment process for securities: No system functionality - approx. the same as for cash	
Switzerland	In Progress	Practice observed, no monitoring process in place	Dividends Nov 09, Rest 2010/11
United Kingdom	Implemented		

### Standard 9

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	For End Investors, information by means of account statement is deemed sufficient unless provided otherwise in their service level agreement or general terms and conditions	
Belgium	In Progress	retail OK, wholesale not ok for pending and new transactions depending on the intermediary	To be discussed within the market
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		

Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		
Sweden	In Progress	Not all intermediaries can send on pending, only on holdings. The CSD only notifies those direct holders that have a holding.	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 10

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	The standard is met if requested via a service level agreement.	
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	In Progress	Only banks communicate the information to intermediaries using ISO standards	It seems difficult for all other market participants to use ISO standards due to the cost of such systems
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented	The Information is communicated in formatted electronic form. For those intermediaries who have SWIFT connectivity, the information flow is ISO compliant.	
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 11

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented	Information is communicated to non-intermediaries per default. The client has the possibility to opt out (and opt in again) the distribution of some information in the SLA.	
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied	

		by the market.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 12a

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented	German market use Entitlement Date rather than Record Date. Renaming is foreseen.	Market practice.
Greece	Implemented		
Italy	Implemented	Record date is implicit and is calculated by reference to the ex date and payment date	We are going to explicitate the record in Issuer announcement and include RD in the CA announcement
Netherlands	Implemented		
Portugal	N/A	Securities are held at CSD in units only	
Spain	Implemented		
Sweden	Implemented		
Switzerland	In Progress		nov-09
United Kingdom	Implemented		

### Standard 12b

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented	The ex date is used only in case the security has been admitted to trading on a regulated market	
Finland	Implemented		
France	Implemented		
Germany	Not Implemented	Record Date not implemented in the German market	Foreseen for Record Date implementation in 2010 if Issuers agree a voluntarily change of market practice. If Issuers do not agree, then legislation is required and an estimated implementation date cannot be provided at this time. Issuers believe that they will not receive 2/3 majorities at the AGM to change the company by-laws, because the investors will not accept a delay of the payment as well as the change of the actual German market practice. If the issuers could not receive majorities at the

			AGM to change the company bylaws they believes as well that they will not receive the simple majorities every year on the AGM for a “late payment” The Issuers prefer an EU directive which must be implemented into the German law and change the actual demand to pay out immediately after General Meeting
Greece	Implemented		
Italy	Implemented	Record date is implicit and is calculated by reference to the ex date and payment date	We are going to explicitate the record in Issuer announcement and include RD in the CA announcement
Netherlands	Implemented		
Portugal	Implemented	For all distributions relating to securities in units the key dates are: Ex Date, Record Date and Payment Date. Note: Ex Date and Record Date are fixed in relation to the Payment Date as defined in the operational rules of the CSD.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	In Progress		nov-09
United Kingdom	Implemented		

### Standard 13

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal regulation of the announcement deadline.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented	ECSD must be notified of corporate events without delay, but not later than three (3) days before the ex date which means five (5) days before the record date.	
Finland	In Progress	Extraordinary dividend payment may currently be announced as late as on ex date -1	
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented	MT could evaluate the possibility to include, in the contract with the Issuers, the latest deadline for communicating CA information (for terms of the same contract issuers are obliged to disclose CA information to MT)	To be discussed with industry
Netherlands	In Progress	Not always met for interim dividends.	Necessary changes in procedures are under discussion; gradual improvements by 2010 Q1
Portugal	Implemented	According to CMVM Regulation no. 5/2008 (Article 7, no. 3), the public announcement by the Issuer of the dividend payment should be made no later than 10 business days before Payment Date.	
Spain	Not Implemented	Art. 215 L.S.A.: The payment of the distribution can be made from the next business day after the general meeting. So a minimum 2 days period from the	High level. Legal Barrier



		announcement and Ex Date does not exist.	
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

#### Standard 14

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal regulation of the deadline for announcements of the payable rate for floating rate instruments	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented	Exceptionnel cases fixing rate at the end of the coupon rate	
Denmark	Implemented		
Estonia	Implemented	It is not compulsory by law, but it is strongly recommended by Good Practices of Corporate Events.	
Finland	Implemented	Detailed regulation missing, practice within standard	
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	In Progress - Legal Gap		Specific cases of non-compliance being analysed by CSD
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

#### Standard 15

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Not Implemented		Same as for 12b. With introduction of Record date processing, we will follow this standard.
Greece	Implemented		
Italy	Implemented		
Netherlands	In Progress	Very few issuers are currently bound by their Bylaws / Articles of Association to use shorter timelines	Issuers to change formalities individually. Timeframe difficult to predict
Portugal	Implemented	For exchange operations, and according to the Euronext Regulations, Ex Date precedes Record Date by one Settlement Cycle minus one day. Interbolsa believes the market	

		complies with this standard for OTC trades.	
Spain	Not Implemented	Ex-date is always the same date than the payment date, and it is not an explicit date in the announcements. Art. 62 Reglamento de Bolsa envisages that the economic benefits and rights correspond to the buyer from the trade date.	High level. Legal Barrier
Sweden	Implemented		
Switzerland	In Progress		nov-09
United Kingdom	Implemented		

### Standard 16

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	In Progress	We recommend complying with this rule with regard to bonds and to make payments on the morning of the business day that follows the record date. In the case of dividend payments we recommend making the payment not earlier than three (3) days after the record date since investors are then able to present, if necessary, tax documents – in order to reduce their tax obligation (on the basis of treaties on avoidance of double taxation), non-residents should present to the issuer the certificate of their residency obtained in their home country before the payment date.	
Finland	In Progress	May be delayed due to lack of automated market claims and due to payments adjusted to applicable tax treaty rates.	
France	Implemented		
Germany	Not Implemented		Same as for 12b. With introduction of Record date processing, we will follow this standard.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Payment Date is always the next business day following Record Date.	
Spain	Implemented		
Sweden	Implemented	It is the opinion of the MIG that the current practice meets the standard of 'as close as possible'. SEK payments are made 3 business days after record date; EUR payments are made 5 business days after record date. Due to the need for currency exchange (SEK to other currency for non-Swedish investors, and EUR to SEK for Swedish investors) the Swedish market believes that a gap of 3 business days between record date and pay date is essential.	
Switzerland	Implemented		
United Kingdom	Implemented	Some timetables in excess of 1 day after	

		record date because of the volumes of non-CSD holders.	
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### Standard 17

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	In Progress	Introduced alongside implementation of the Euroclear Single Platform Custody development	Q4 2010

### Standard 18

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	In Progress - Market at least 50% compliant	CSD is compliant with this standard.	2013 (T2S Milestone)
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Not Implemented	MT specifies two different amounts, distinguishing redemption and interests, but within the same event reference number	To be implemented
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 19

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented	BE market has taken the initiative to go for Direct Payment	Implementation by November 2009
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	In Progress - Market at least 80% compliant	French Market Place allows two kinds of process which depends on the issuer choice : "Direct Payment" or "Classical Payment". "Direct Payment" processing involves a high	SP custody (ESES EUI)

		majority of payments and this process is fully compliant with this standard. "Classical Payment" processing is based on unscript coupon booking. Even if it is an efficient process of unscript coupon wires between Issuers and financial intermediaries, this practice, which still minor, is not fully compliant with this standard. Moreover, the implementation is not a consequence of Market System enhancement but only a matter of Market Practice. Such as, SP Custody highly recommends the Direct Payment practice and is then considered as a milestone for this practice implementation.	
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	In Progress	Note: Market Claims are not yet implemented.	Market claims for dividends are planned for 2009
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

#### Standard 20a

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented	It is not obligatory by law to make the payments through the Issuer (I) CSD, the Issuers can choose the payment agent (CSD, commercial bank) or process payments themselves. If payments are made through the CSD, the same Payment mechanism as for other cash transactions through the Issuer (I) CSD is used.	
Finland	In Progress	Equities market - payment outside settlement system Fixed income market - payment in settlement system	
France	In Progress - Market at least 80% compliant	Linked with item 19 Currently applied in the scope of "Direct Payment" processing which is fully compliant with this standard. The implementation is only a matter of choice linked to issuer practices (please refer to item 19) and not at all a technical issuer. Such as SP Custody highly recommends the Direct Payment practice.	SP custody (ESES EUI)
Germany	Implemented		Market practice.
Greece	N/A		
Italy	Implemented	as from BICOMP (payment system) rules, payment instructions are irrevocable after 10:30 and cash settlement instructions are sent within 12:00	
Netherlands	Implemented		
Portugal	Implemented		
Spain	Not Implemented	Some payments are not made in Central Bank	High level. Legal Barrier

		money (10% aprox.) since Art. 215 L.S.A. envisages the possibility of make the payment directly at the Issuer's Registered Address. Fix income payments are always made in central bank money.	
Sweden	Not Implemented	Local payments are made with commercial bank money, however a proposed model with central bank money has been accepted by the market and is described in the NCSD White Paper on Mandatory cash distributions.	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	In Progress	Met for all corporate actions other than dividends. Dividend payments to be defaulted via the CSD from inauguration of the Single Platform Custody development. Acceptance of the change of default mode of payment needs to be adopted by Issuers - Issuer Agents committed to providing the service where Issuers comply.	From Q4 2010 - complete by 2012

### Standard 20b

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented	Fx may occur for income pmt of locally listed, non-resident companies	
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented	The 12.00 deadline is met for payments in EUR; for some foreign currencies, this deadline cannot be met due to market conventions for those currencies.	
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 20c

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Not Implemented	EOC/NBB not OK EOC current recommended deadline is : 2/3 pm. NBB starts at 12:00	
Denmark	Implemented	The euro payment batch 45 is settled at 12:05	
Estonia	Implemented		
Finland	Implemented		
France	In Progress - Market at least 80% compliant	Please refer to Item 19 comment. "Direct Payment" processing is fully compliant with this standard. However in the case of "Classical Payment", which still a minority of cases, securities are not delivered on "Payment Date" (or its	SP custody (ESES EUI)

		equivalence). The implementation is only a matter of choice linked to issuer practices (please refer to item 19) and not at all a technical issuer. Such as, SP Custody highly recommends the Direct Payment practice.	
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented	as from BICOMP (payment system) rules, payment instructions are irrevocable after 10:30 and cash settlement instructions are sent within 12:00	
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	In Progress	Payments can be made until 2 pm	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	In Progress	Met for vast majority of events. Dividend payments to be defaulted via the CSD from inauguration of the Single Platform Custody development. Issuer agents will only distribute payments when in receipt of funds from the Issuer.	From Q4 2010 - complete by 2012

### Standard 20d

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 20e

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Not Implemented	We agree but cannot always comply. If the payment is completed it cannot be reversed by the CSD (legal matter)	
Estonia	Implemented		
Finland	In Progress	Applicable in most cases.	
France	In Progress - Market at least	This case is marginal in France but may happen. Technically the CSD offers currently	SP custody (ESES EUI)

	50% compliant	this possibility for mandatory cash distributions. The reference to SP Custody in terms of implementation is to be considered as a milestone.	
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Not Implemented	MT does not reverse the whole payment, rather it makes adjustments in the paid amount	To be discussed with industry
Netherlands	Implemented		
Portugal	Implemented		
Spain	Not Implemented	No complete reversal of the Payment is done. The difference is credited or debited depending on the case	High level
Sweden	Implemented	Additional payment may be made, if the original payment was too low. However, the MIG does not believe that this constitutes a gap to be removed.	
Switzerland	Implemented		
United Kingdom	Implemented		



### 3.3.3 Securities Distributions

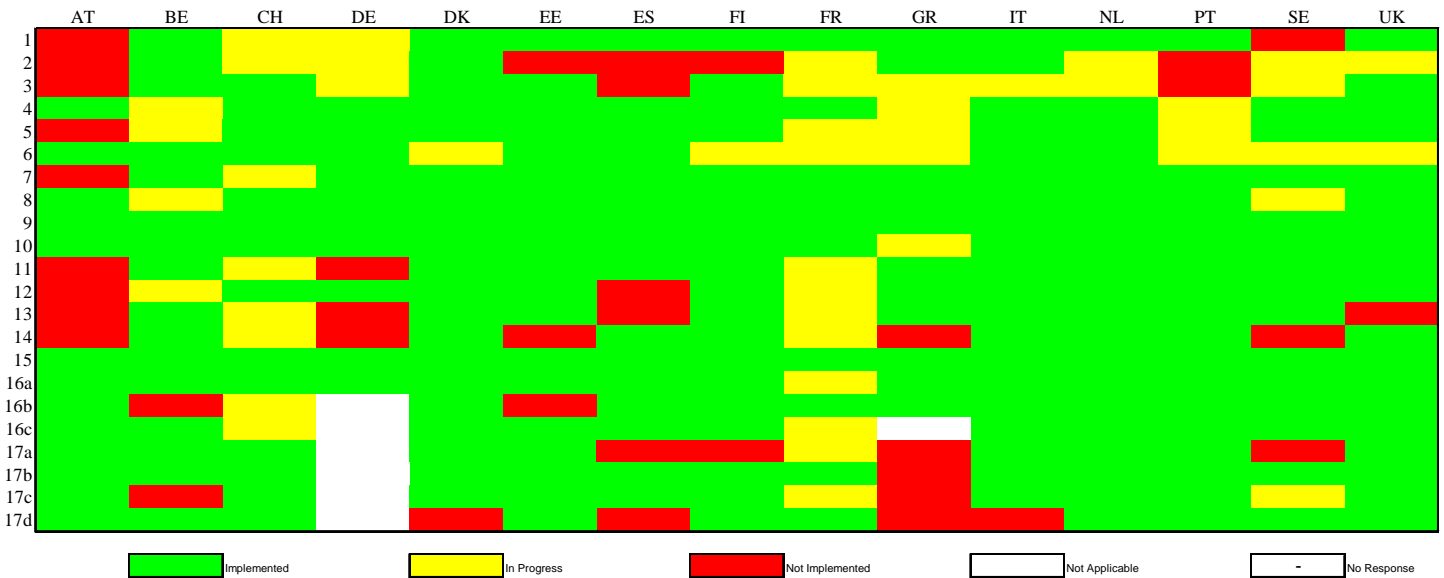


Figure 5: Overview Securities Distributions

#### Standard 1

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. There is no legal basis for a direct announcement process between issuer or issuer's agent and the CSD.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented	In Finland data content is not equal to standard and time schedule is more flexible	
France	Implemented	Currently, due to bottom up method, the reference price is not currently applicable in France. However the Market systems are able to carry this data and then are fully compliant with this standard.	
Germany	In Progress	No guaranteed information from Issuer to (I)CSD. Central publication via data vendor Wertpapier-Mitteilungen. Equivalent market practice to get the standard	Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	According to Interbolsa's rules all issuers must advise Interbolsa of any corporate action within 15 days in advance. As a result, Interbolsa knows the event before its announcement to the market.	
Spain	Implemented		
Sweden	Not Implemented	Most issuers wait until later. The ISIN cannot be included in the official announcement, since it cannot be requested before it.	Discuss with stock exchange and/or issuer representatives.

		However, the ISIN is generally not provided as soon as possible. No compensation price for fractions is announced - but the method of determining the price is usually announced.	
Switzerland	In Progress	Flow to (I)CSD not synchronised with public announcement	2010/11
United Kingdom	Implemented		

## Standard 2

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. There is no legal basis for a direct announcement process between issuer or issuer's agent and the CSD. Currently there is no ISO 15022/20022 standards for issuer-CSD communication available, only issuers-agent (bank) ought to communicate with the CSD.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented	Domestically we use a proprietary format containing the same information as the ISO standard	
Estonia	Not Implemented	The issuer informs ECSD of corporate events by filling out the application form specified by ECSD which is available at the website of ECSD.	
Finland	Not Implemented	information provided in non-electronic format	
France	In Progress - Market at least 50% compliant	The current issuer CSD format is a proprietary format. This will be enhanced with the implementation of SP Custody.	Linked with SP Custody (ESES EUI) delivery
Germany	In Progress	Issuers generally inform via WM, onward communication from CSD to market participants is electronic. Communication in electronic format from Issuer to WM not guaranteed. Potential Quality GAP.	Market practice.
Greece	Implemented	A web-based proprietary system (HERMES) is used for all information that issuers announce to the Exchange and CSD.	
Italy	Implemented		
Netherlands	In Progress	Various messages vary in timeliness, content and completeness	A uniform formular will be designed for use in different situations between different players in the chain. 2009 Q4
Portugal	Not Implemented	The information received by Interbolsa from issuers is not sent electronically.	Not planned
Spain	Not Implemented	Iberclear is analysing the possibility of implementing the ISO message that it is being developed by SWIFT 20022. Standard messages for Corporate Actions are not available in ISO 15022.	High level
Sweden	In Progress	The communication is done in formatted form via a web interface, but not in ISO standards. The format and content will support ISO messages further down the chain to the intermediaries.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	In Progress		2010/11
United Kingdom	In Progress	Introduced alongside implementation of the	Q4 2010

		Euroclear Single Platform Custody development	
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### Standard 3

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. There is no legal basis for a direct announcement process between issuer or issuer's agent and the CSD. Currently there is no need for a translation into English by law. The narrative text in the information should be at least in english whether or not a international shareholder base exists.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented	Today, it is not required that corporate action announcements are delivered together with a translation into English. However, as regards information from public listed companies, translations into English are delivered in estimated 80-90 percent of all announcements.	
Estonia	Implemented	According to clause 2.4.5 of the section "Requirements to issuers" of the Rules of Procedure of the Tallinn Stock Exchange, all stock market releases and financial reports must be made public both in the Estonian and English language. In case of corporate actions of those issuers whose securities are not tradable on a regulated market, there is no such direct legal obligation, but, if possible, it is recommended to add a summary in English about the event.	
Finland	Implemented	some issuers do not provide narrative in English	
France	In Progress - Market at least 80% compliant	This item is not an issue in terms of system enhancement but a matter of practices. It is fully dependent on the ability of an issuer to provide this information in english. This is mainly the case today but few exceptions may still remain. Implementation shall be seen then only as a matter of practices evolution for these remaining exceptional cases. Moreover, even if the CAJWG has issued operationnal standards, a legal aspect may be raised in case of litigation on the translated document toward the original one issued in local language.	T2S
Germany	In Progress	The companies which are listed in the DAX and M-DAX announce in German and English.	Market practice is German language. No change foreseen. Legislation is required and an estimated implementation date cannot be provided at this time.
Greece	In Progress	Only issuers of "big cap" market segment publish a summary in English. For "small cap" issuers is possible but not obligatory	Within 2010
Italy	In Progress	Procedures are compliant, but a moral suasion has to be made in order to convince all	

		issuers, having an international shareholder base, to provide narrative in English,	
Netherlands	In Progress		A uniform formular will be designed for use in different situations between different players in the chain. 2009 Q4
Portugal	Not Implemented	Currently, the announcements are only provided in Portuguese. Note: sometimes the announcements disclosed by CMVM are in English and in Portuguese.	Not planned
Spain	Not Implemented	Only some issuers already translate into English their announcements. Legal Barrier. There is not any spanish law that envisages this obligation.	High level. Legal Barrier
Sweden	In Progress	Narrative is seldom used in the communication of securities distributions to the CSD, but when provided it is usually in Swedish only.	Discuss with stock exchange and/or issuer representatives.
Switzerland	Implemented	Correct assessment difficult, information about shareholder base not available	
United Kingdom	Implemented		

#### Standard 4

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	The standard is met if information about pending transaction is requested via a service level agreement or in the general terms and conditions.	
Belgium	In Progress	EOC partially OK - not for pending transactions NBB N/A	EOC implementation end 2010 (SP Custody launch)
Denmark	Implemented		
Estonia	Implemented	Information is made available on the corporate actions web-page of the Estonian CSD and distributed to its participants via SWIFT or email by ISO standard messages.	
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	In Progress	CSD publishes all announcements without undue delay of receipt by the issuer in its website without addressing the information exclusively to participants	Within 2010 (only to participants who have a direct holding)
Italy	Implemented		
Netherlands	Implemented		
Portugal	In Progress	The information related to quantities and provisional amounts to be paid is only disclosed to participants with account positions. Currently, this information is not communicated to the participants who have pending transactions.	Not planned
Spain	Implemented		
Sweden	Implemented	The Corporate Actions information system from the CSD, SI, sends all information to all SI subscribers	
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 5

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	EOC partially OK - not for new transactions NBB N/A	EOC implementation end 2010 (SP Custody launch)
Denmark	Implemented		
Estonia	Implemented	Information is made available on the corporate actions web-page of the Estonian CSD and distributed to its participants via SWIFT or email by ISO standard messages.	
Finland	Implemented	currently such information is provided to all NCSD/APK participants	
France	In Progress - Market at least 50% compliant	This requirement is currently met in "SLAB" system but not in all the ESES scope.	Linked to SP Custody (ESES EUI) delivery
Germany	Implemented		Market practice.
Greece	In Progress		Within 2010
Italy	Implemented		
Netherlands	Implemented		
Portugal	In Progress	This communication is made to any participant who obtains a new holding but not to pending transactions (see answer to standard 5).	Not planned
Spain	Implemented		
Sweden	Implemented	The Corporate Actions information system from the CSD, SI, sends all information to all SI subscribers	
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 6

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	In Progress	VP and relevant domestic market participants are working on a proposal for solutions to the mentioned standards as a consequence of the fact that the infrastructure on the Danish market does not fully comply with the standard. Solutions for the standard are processed jointly and are included as elements in the development of a new announcement infrastructure. The proposals will probably require change of domestic rules and regulations.	
Estonia	Implemented		
Finland	In Progress	by default information is currently provided in free-text format. Proprietary format information delivery is available at extra cost.	
France	In Progress - Market less than 50% compliant	The current issuer CSD format is a proprietary format. This will be enhance with the implementation of SP Custody	Linked to SP Custody (ESES EUI) delivery
Germany	Implemented		Market practice.
Greece	In Progress		Within 2010
Italy	Implemented	depending on users choice	

Netherlands	Implemented		
Portugal	In Progress	Interbolsa's communication with its participants is done electronically using a proprietary communication protocol.	Not planned
Spain	Implemented	The Information is communicated in formatted electronic form, but not in ISO standards. Iberclear is analysing with the market participants the possibility of implementing the MT564 message for the information distribution.	
Sweden	In Progress	Proprietary interface	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Implemented		
United Kingdom	In Progress	Introduced alongside implementation of the Euroclear Single Platform Custody development	Q4 2010

### Standard 7

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	The Issuer (I)CSD announces the reason of the reversal with the reversal of a payment.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented	Information would be sent to all concerned parties. Process for cash: Issuers need to ask each custodian/bank to reverse the payment Process for securities: No system functionality - approx. the same as for cash	
Switzerland	In Progress	Practice observed, no monitoring process in place	Monitored by the CSD as of 2010/11
United Kingdom	Implemented		

### Standard 8

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	For End Investors, information by means of account statement is deemed sufficient unless provided otherwise in their service level agreement or general terms and conditions	
Belgium	In Progress	retail OK, wholesale not ok for pending and new transactions depending on the intermediary	To be discussed within the market
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented	Content of the point was considered to be service level agreement issue. Particularly, when concerning the end investor but also in relation to intermediary relationships.	

France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		
Sweden	In Progress	Not all intermediaries can send on pending, only on holdings. The CSD only notifies those direct holders that have a holding.	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 9

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	The standard is met if requested via a service level agreement.	
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented	The Information is communicated in formatted electronic form. For those intermediaries who have SWIFT connectivity, the information flow is ISO compliant.	
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 10

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented	Information is communicated to non-intermediaries per default. The client has the possibility to opt out (and opt in again) the distribution of some information in the SLA.	
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	In Progress	Only banks communicate the information to intermediaries using ISO standards	It seems difficult for all other market participants to use ISO standards due to the cost of such systems
Italy	Implemented		
Netherlands	Implemented		



Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 11

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented	The ex date is used in case the security has been admitted to trading on a regulated market	
Finland	Implemented		
France	In Progress - Market less than 50% compliant	Key Dates and their chronology rules and practices are dependant on the H2D study application. Rules and Practices have been validated by CFONB on mid 2009 summer for the whole french securities industrie.	SP Custody (ESES EUI)
Germany	Not Implemented	Record Date not implemented in the German market	Foreseen for Record Date implementation in 2010 if Issuers agree a voluntarily change of market practice.If Issuers do not agree, then legislation is required and an estimated implementation date cannot be provided at this time. Issuers believe that they will not receive 2/3 majorities at the AGM to change the company by-laws, because the investors will not accept a delay of the payment as well as the change of the actual German market practice. If the issuers could not receive majorities at the AGM to change the company bylaws they believes as well that they will not receive the simple majorities every year on the AGM for a "late payment" The Issuers prefer an EU directive which must be implemented into the German law and change the actual demand to pay out immediately after General Meeting
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	For all distributions relating to securities in units the key dates are: Ex Date, Record Date and Payment Date. Note: Ex Date and Record Date are fixed in relation to the Payment Date as defined in the operational rules of the CSD.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	In Progress		Nov-09

United Kingdom	Implemented		
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### Standard 12

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal regulation of the announcement deadline.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	Not OK for price sensitive events	To be discussed with the Issuers (at European level)
Denmark	Implemented		
Estonia	Implemented	Obligatory for Issuers whose securities are traded on the regulated market.	
Finland	Implemented		
France	In Progress - Market less than 50% compliant	Key Dates and their chronology rules and practices are dependant on the H2D study application. Rules and Practices have been validated by CFONB on mid 2009 summer for the whole french securities industrie.	SP Custody (ESES EUI)
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented	MT could evaluate the possibility to include, in the contract with the Issuers, the latest deadline for communicating CA information (for terms of the same contract issuers are obliged to disclose CA information to MT)	To be discussed with industry
Netherlands	Implemented		
Portugal	Implemented	According to CMVM Regulation no. 5/2008 (Article 7, no. 3), the public announcement by the Issuer of the dividend payment should be made no later than 10 business days before Payment Date.	
Spain	Not Implemented	Art. 215 L.S.A.: The payment of the distribution can be made from the next bussines day after de general meeting. So a minimum 2 days period from the announcement and Ex Date does not exist.	High level. Legal Barrier
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 13

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	In Progress - Market less than 50% compliant	Key Dates and their chronology rules and practices are dependant on the H2D study application. Rules and Practices have been validated by CFONB on mid 2009 summer for the whole french securities industrie.	SP Custody (ESES EUI)

Germany	Not Implemented		Same as for 11. With introduction of Record date processing, we will follow this standard.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	For exchange operations, and according to the Euronext Regulations, Ex Date precedes Record Date by one Settlement Cycle minus one day. Interbolsa believes the market complies with this standard for OTC trades.	
Spain	Not Implemented	Ex-date is always the same date than the payment date, and it is not an explicit date in the announcements. Art. 62 Reglamento de Bolsa envisages that the economic benefits and rights correspond to the buyer from the trade date.	High level. Legal Barrier
Sweden	Implemented		
Switzerland	In Progress		Nov-09
United Kingdom	Not Implemented	Discuss with BIS. Objection from Retail Market plus possible compliance/Legal issues. Also note that Rights issues for which an EGM is not required are likely to retain the Record > Ex > Payment cycle. UKMIG to invite to September 2009 meeting.	

#### Standard 14

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Not Implemented	Not regulated by legal acts, but still usually followed in case of securities tradable on a regulated market.	
Finland	Implemented		
France	In Progress - Market less than 50% compliant	Key Dates and their chronology rules and practices are dependant on the H2D study application. Rules and Practices have been validated by CFONB on mid 2009 summer for the whole french securities industrie.	SP Custody (ESES EUI)
Germany	Not Implemented		Same as for 11. With introduction of Record date processing, we will follow this standard.
Greece	Not Implemented	Usually payment date comes no earlier than 2 BD days after Record Date	Within 2010
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Payment Date is always the next business day following Record Date.	
Spain	Implemented		
Sweden	Not Implemented	The CSD does not require pay date to be the day after record date. Pay date equal to record date + 2 is common for distribution of rights and stock dividends.	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done (by the latest) with the implementation of Single

			Platform in Sweden.
Switzerland	In Progress		Nov-09
United Kingdom	Implemented		

### Standard 15

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 16a

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented	Compulsory in case the security has been admitted to trading on a regulated market.	
Finland	Implemented		
France	In Progress - Market at least 50% compliant	When SP Custody will be implemented, the securities distribution should depend on a greenlight given by the Payment agent. The final process of this greenlight for this kind of distributions is to be finetuned. Due to current operational constraints and considering the current procedures, this greenlight could occur only on Pay Date. As a result, involved securities would not be available when the settlement system opens but the day after. In such case, the 16(a) requirement would not be met.	SP Custody (ESES EUI)
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented	Due to the timing of Listing Announcement (8am) it is not possible to distribute at the point of opening the Settlement system (6am). Question whether the spirit of the recommendation has been met as the distribution is typically made directly after Listing is granted. Securities Listing occurs when the London Stock Exchange opens at	

		8:00am. The CSD opens at 6:00am. It cannot pay out securities that are not yet listed when the system opens at 6:00am, therefore payment will take place only at 8:00am.	
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### Standard 16b

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	It must be possible to “ROUND UP AND DOWN” If the issuer sets a price for the compensation of fractional shares, it must be possible to settle total amounts of fractions for several accounts against the issuer. (Issuer has to compensate fractions of end investors).	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Not Implemented		To be discussed with the Issuers
Denmark	Implemented		
Estonia	Not Implemented	Rounding rules are determined by the Issuer.	
Finland	Implemented		
France	Implemented		
Germany	N/A	Processing is top down, but (I)CSD is able to process fractional amounts of securities to 3 decimal places. Round down occurs to this level.	
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		
Sweden	Implemented	This is the most common method, but the issuer can also choose to round up.	
Switzerland	In Progress	Mostly observed, exceptions possible	2010/11
United Kingdom	Implemented		

### Standard 16c

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	In Progress - Market less than 50% compliant	The current procedure is based on bottom up process. In this case, if it occurs, there is no difficulty and compliance with this standard. On the contrary, the top down method using a reference price, needs further analyse to be implemented. Moreover the reference price cannot be guaranteed by intermediaries if not guaranteed by the issuer. Potentially it would be technically possible to apply this procedure in ESES. This issue needs further investigation but generally speaking, the meeting of this gap would follow the milestone of SP Custody (ESES EUI) delivery.	SP Custody (ESES EUI)
Germany	N/A	There is no CINL cash compensation in the German Market. Fractions of securities are distributed.	

Greece	N/A	Fractions compensation takes place later and irrespective of the event's payment dates since. Furthermore fractions are calculated on the end client level	
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	In Progress	Mostly observed, exceptions possible	2010/11
United Kingdom	Implemented		

### Standard 17a

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Not Implemented	Equities market - payment outside settlement system Fixed income market - payment in settlement system	
France	In Progress - Market less than 50% compliant		Linked to SP Custody (ESES EUI) delivery
Germany	N/A		
Greece	Not Implemented		Within 2010
Italy	Implemented		Cash settlement for fractions according to the payment mechanism in use for other cash transactions is going to be launched soon
Netherlands	Implemented		
Portugal	Implemented		
Spain	Not Implemented	Some payments are not made in Central Bank money (10% aprox.) since Art. 215 L.S.A. envisages the possibility of make the payment directly at the Issuer's Registered Address.	High level. Legal Barrier
Sweden	Not Implemented	The payment is not made via the CSD's settlement system.	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 17b

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	N/A		
Greece	Not Implemented		Within 2010
Italy	Implemented		
Netherlands	Implemented		

Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 17c

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Not Implemented	EOC Not Implemented, NBB N/A current recommended deadline is : 2/3 pm	
Denmark	Implemented	The euro payment batch 45 is settled at 12:05	
Estonia	Implemented		
Finland	Implemented		
France	In Progress - Market at least 80% compliant	As mentioned before, French Market Place allows two kinds of process which depends on the issuer choice : "Direct Payment" or "Classical Payment". In the case of "classical payment", the deadlines target may not be met.	
Germany	N/A		
Greece	Not Implemented		Within 2010
Italy	Implemented	as from BICOMP (payment system) rules, payment instructions are irrevocable after 10:30 and cash settlement intructions are sent within 12:00	
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented	Some payments are done after midday in order to avoid potential risks for the Agent Bank.	
Sweden	In Progress	Payments can be made until 2 pm	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	Implemented	Met for vast majority of events	

### Standard 17d

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Not Implemented	We agree but cannot always comply. If the payment is completed it cannot be reversed by the CSD (legal matter)	
Estonia	Implemented		
Finland	Implemented		
France	Implemented	This case is marginal in France but may applied through the CSD for mandatory stock distributions.The implementation target is to be seen as a milestone but not a dependance on the SP Custody delivery.	SP Custody (ESES EUI)
Germany	N/A		
Greece	Not Implemented		Within 2010
Italy	Not Implemented	MT does not reverse the whole payment, rather it makes adjustments in the paid	To be discussed with industry

		amount	
Netherlands	Implemented		
Portugal	Implemented		
Spain	Not Implemented	No complete reversal of the Payment is done. The difference is credited or debited depending on the case.	High level
Sweden	Implemented	This does not occur.	
Switzerland	Implemented		
United Kingdom	Implemented		



### 3.3.4 Distributions with Options

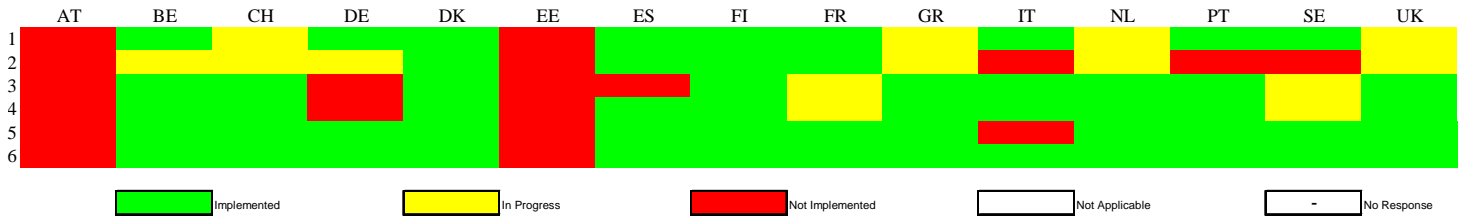


Figure 6: Overview Distributions with Options

#### Standard 1

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	Currently not market Practice. In Review.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented	We have a domestic system for investors' selection between stock dividend or cash dividends on investment funds. This is registered on the CSD account (direct holding account system) without a need for a "selection ISIN". This is not prohibitive against cross boarder transactions.	
Estonia	Not Implemented		
Finland	Implemented	In Finland data content is not equal to standard and time schedule is more flexible	
France	Implemented		
Germany	Implemented		Market practice.
Greece	In Progress	For rights issue an interim security with attached options, bearing its own ISIN, is issued and represents the rights until their expiration. For other events, such as optional dividends, since trade option is not provided, no interim securities are going to be issued.	No plans for implementation
Italy	Implemented		
Netherlands	In Progress	Not always met when it probably should, e.g. for DRIPs.	A uniform formular will be designed for use in different situations between different players in the chain. Major improvements by 2009 Q4
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	In Progress	Mostly observed, exceptions possible	2010/11
United Kingdom	In Progress	Not met for dividend type distributions. Awaiting views from Irish MAC prior to agreeing a way forward. Institutional clients reject concept of issuing interim securities for DRIP events. Interim processing also dependant upon Issuer adoption of this change in practice, albeit that Issuer Agents in agreement to use interims.	Expected Q4 2010

#### Standard 2

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	Currently not market Practice. In our view the choice between one or two separate	In coordination with the members of CANIG Austria. Meeting in 09/09 -

		announcements for distributions with options should be allowed - at least in the information to the final beneficiary	10/09.
Belgium	In Progress	EOC partially OK, NBB N/A	To be discussed with the market
Denmark	Implemented		
Estonia	Not Implemented	No market practice in such events. The processes have not been automated by the ECSD.	Plans to be set up by ECSD in cooperation with the market participants.
Finland	Implemented		
France	Implemented		
Germany	In Progress	System processing is based on 2 separate events, but this is transparent to the client. Distribution is CHOS and Reorg is VOLU. Clients want to know the options as soon as possible, so these are sent with the distribution event. It is not indicated in the SWIFT notification (actually indicator for both events is RHTS)	Estimated implementation date cannot be provided at this time
Greece	In Progress	Although operationally is possible to handle the issuance of an interim security and the attached options to it as two separate events, issuer communicate the event to CSD considered as one.	Within 2010
Italy	Not Implemented	Distribution with option and the related mandatory reorg with option (or voluntary reorg) are treated as a unique event	to be discussed with industry
Netherlands	In Progress	Not always met when it probably should, e.g. for DRIPs.	A uniform formular will be designed for use in different situations between different players in the chain. Major improvements by 2009 Q4
Portugal	Not Implemented	The issuance of interim security and the exercising of options is done separately but belong to the same corporate actions as defined in the operation procedures of the CSD	
Spain	Implemented		
Sweden	Not Implemented	Most often one event. CSD receives the information quite late.	Time of announcement: Discuss with stock exchange and/or issuer representatives. Separate events: Discuss in the Corporate Actions WG for migration to the Single Platform and the NMPG CA-WG.
Switzerland	In Progress	Two events, but single message	
United Kingdom	In Progress	Linking of corporate actions will be introduced alongside implementation of Euroclear Single Platform Custody development. Note dependency upon completion of Standard 1!!	

### Standard 3

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Not Implemented		
Finland	Implemented		

France	In Progress - Market at least 80% compliant	For Market status, please refer to the considered standards (meaning Securities Distributions section) This item is not an issue in terms of system enhancement but a matter of practices. It is fully dependent on the ability of an issuer to provide this information in english. This is mainly the case today but few exceptions may still remain. Implementation shall be seen then only as a matter of practices evolution for these remaining exceptional cases. Moreover, even if the CAJWG has issued operationnal standards, a legal aspect may be raised in case of litigation on the translated document toward the original one issued in local language.	T2S
Germany	Not Implemented	Standards met with the exception of the items concerning Record Date processing, as detailed above for Security distributions.	Foreseen for Record Date implementation in 2010 if Issuers agree a voluntarily change of market practice. If Issuers do not agree, then legislation is required and an estimated implementation date cannot be provided at this time. Issuers believe that they will not receive 2/3 majorities at the AGM to change the company by-laws, because the investors will not accept a delay of the payment as well as the change of the actual German market practice. If the issuers could not receive majorities at the AGM to change the company bylaws they believes as well that they will not receive the simple majorities every year on the AGM for a "late payment" The Issuers prefer an EU directive which must be implemented into the German law and change the actual demand to pay out immediately after General Meeting
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented	OK if standard method is used and 1 + 2 are met	
Portugal	Implemented		
Spain	Not Implemented	Implemented in the same conditions indicated in "Securities Distributions"	High level. Legal Barrier
Sweden	In Progress	See gaps for Securities Distribution	See gaps for Securities Distribution
Switzerland	Implemented	Treated like a sec. distribution (status as above)	
United Kingdom	Implemented	Note dependancy upon completion of Standard 1!!	

#### Standard 4

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Not Implemented		

Finland	Implemented		
France	In Progress	For Market status, please refer to the considered standards (meaning Securities Reorganisation section)	
Germany	Not Implemented	Standards met with the exception of the items concerning Record Date processing, as detailed above for Security distributions.	Foreseen for 2010 if Issuers agree a voluntarily change of market practice. If Issuers do not agree, then legislation is required and an estimated implementation date cannot be provided at this time.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented	OK if standard method is used and 1 + 2 are met	
Portugal	Implemented		
Spain	Implemented		
Sweden	In Progress	See gaps for Reorganisation	See gaps for Reorganisation
Switzerland	Implemented	Treated like optional event (status as below)	
United Kingdom	Implemented	Note dependancy upon completion of Standard 1!! Also note that Rights issues for which an EGM is not required are likely to retain the Record > Ex > Payment cycle.	

### Standard 5

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Not Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Not Implemented	Legal gap: Italian law establishes that election period would start on the ex date	
Netherlands	Implemented	OK if standard method is used and 1 + 2 are met	
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented	According to law (ABL), the exercise period of a rights issue must be a minimum of 2 weeks and can start from the record date. For more information please see standard 12 of Mand reorg w options	
Switzerland	Implemented		
United Kingdom	Implemented	Note dependancy upon completion of Standard 1!!	

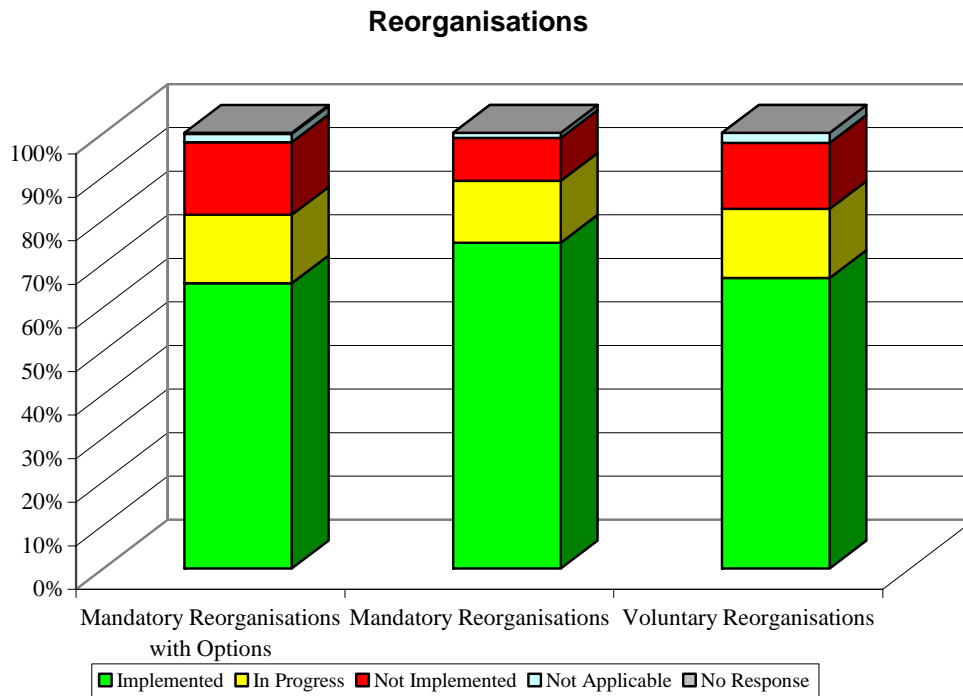
### Standard 6

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Not Implemented		

Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented	OK if standard method is used and 1 + 2 are met	
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented	Note dependancy upon completion of Standard 1!	

### 3.4 Market Standards on Reorganisations

#### 3.4.1 Overall status



**Figure 7:** Overall status market standards on reorganisations

The market standards on mandatory reorganisations with options have an implementation percentage of 65%. 16% are still in progress, while 17% are not yet implemented.

Already 75% of the standards on mandatory reorganisations are implemented. 14% are still in progress and 10% not yet implemented.

The situation for the standards on voluntary reorganisations is the following: 67% are implemented, 16% are in progress and 15% are not yet implemented.

In the following paragraphs you can see the detailed feedbacks received from the single countries with respect to Reorganisations.

### 3.4.2 Mandatory Reorganisations with Options

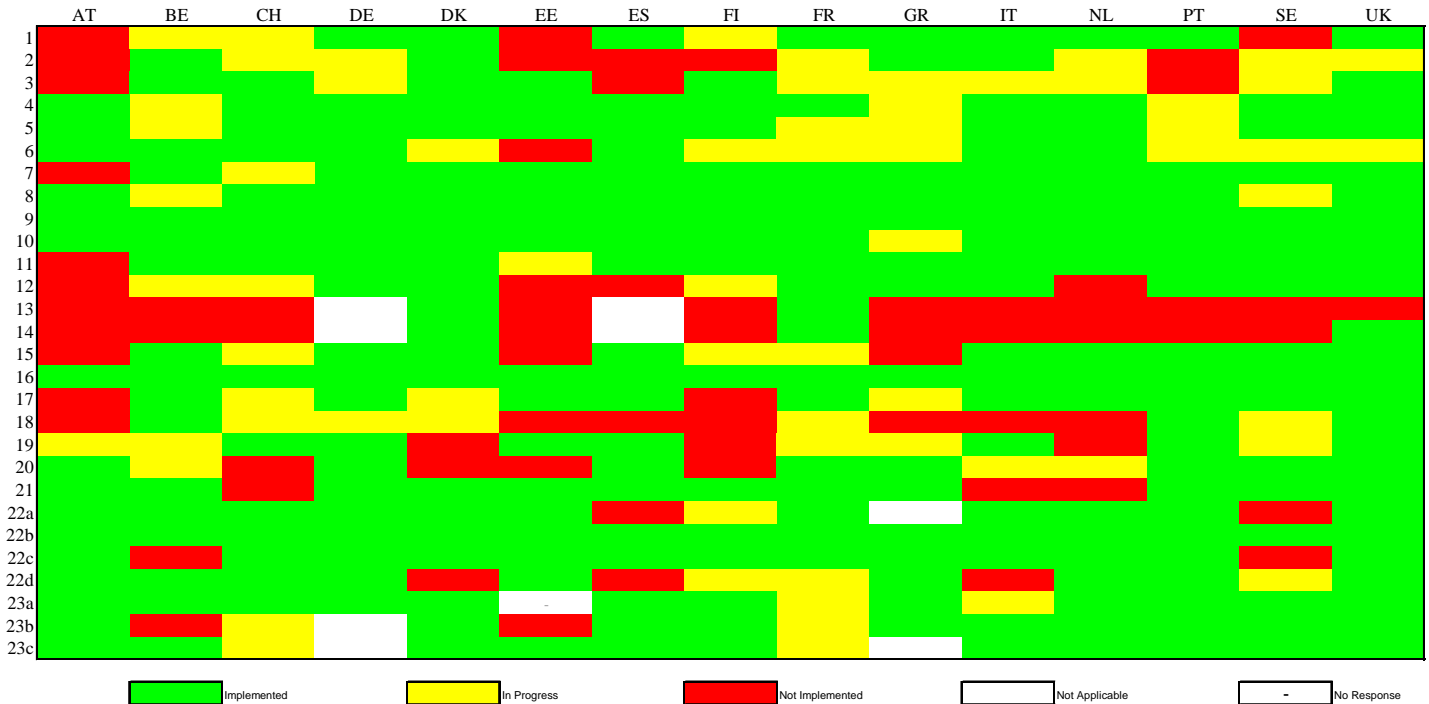


Figure 8: Overview Mandatory Reorganisations with Options

#### Standard 1

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. There is no legal basis for a direct announcement process between issuer or issuer's agent and the CSD.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress		Issuer should determine buyer protection, guaranteed participation date in their announcement . With BE issuers: to be discussed.
Denmark	Implemented		
Estonia	Not Implemented	Very little market practice in such events.	Plans to be set up by ECSD in cooperation with the market participants.
Finland	In Progress	In Finland data content is not equal to standard and time schedule is more flexible	
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	According to Interbolsa's rules all issuers must advise Interbolsa of any corporate action within 15 days in advance. As a result, Interbolsa knows the event before its announcement to the market.	
Spain	Implemented		
Sweden	Not Implemented	Most issuers wait until later. The ISIN cannot be included in the official announcement, since it cannot be requested before it.	Discuss with stock exchange and/or issuer representatives.

		However, the ISIN is generally not provided as soon as possible. No compensation price for fractions is announced - but the method of determining the price is usually announced.	
Switzerland	In Progress	Flow to (D)CSD not synchronised with public announcement	2010/11
United Kingdom	Implemented		

## Standard 2

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. There is no legal basis for a direct announcement process between issuer or issuer's agent and the CSD. Currently there is no ISO 15022/20022 standards for issuer-CSD communication available, only issuers-agent (bank) ought to communicate with the CSD.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented	Domestically we use a proprietary format containing the same information as the ISO standard	
Estonia	Not Implemented		
Finland	Not Implemented	information provided in non-electronic format	
France	In Progress - Market at least 50% compliant	The current issuer CSD format is a proprietary format. This will be enhanced with the implementation of SP Custody	Linked to SP Custody (ESES EUI) delivery
Germany	In Progress	Issuers generally inform via WM, onward communication from CSD to market participants is electronic. Communication in electronic format from Issuer to WM not guaranteed. Potential Quality GAP	Market practice.
Greece	Implemented	A web-based proprietary system (HERMES) is used for all information that issuers announce to the Exchange and CSD.	
Italy	Implemented	Mt-X is the main communication channel for the relation of issuers vis à vis Monte Titoli. Therefore, we are compliant because of the use of formatted electronic forms, but the information flow is not an ISO standard	This issue is not important for Monte Titoli since all Italian issuers participating to Monte Titoli have adapted to the format in use.
Netherlands	In Progress	Various messages vary in timeliness, content and completeness	A uniform formular will be designed for use in different situations between different players in the chain. Major improvements by 2009 Q4
Portugal	Not Implemented	The information received by Interbolsa from issuers is not sent electronically.	Not planned
Spain	Not Implemented	No comply- Iberclear is analysing the possibility of implementing the ISO message that it is being developed by SWIFT 20022. Standard messages for Corporate Actions are not available in ISO 15022.	High level
Sweden	In Progress	The communication is done in formatted form via a web interface, but not in ISO standards. The format and content will support ISO messages further down the chain to the intermediaries.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	In Progress		2010/11



United Kingdom	In Progress	Introduced alongside implementation of the Euroclear Single Platform Custody development	Q4 2010
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### Standard 3

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. There is no legal basis for a direct announcement process between issuer or issuer's agent and the CSD. Currently there is no need for a translation into English by law. The narrative text in the information should be at least in english whether or not a international shareholder base exists.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented	Today, it is not required that corporate action announcements are delivered together with a translation into English. However, as regards information from public listed companies, translations into English are delivered in estimated 80-90 percent of all announcements.	
Estonia	Implemented	According to clause 2.4.5 of the section "Requirements to issuers" of the Rules of Procedure of the Tallinn Stock Exchange, all stock market releases and financial reports must be made public both in the Estonian and English language. In case of corporate actions of those issuers whose securities are not tradable on a regulated market, there is no such direct legal obligation, but, if possible, it is recommended to add a summary in English about the event.	
Finland	Implemented		
France	In Progress - Market at least 80% compliant	This item is not an issue in terms of system enhancement but a matter of practices. It is fully dependent on the ability of an issuer to provide this information in english. This is mainly the case today but few exceptions may still remain. Implementation shall be seen then only as a matter of practices evolution for these remaining exceptional cases. Moreover, even if the CAJWG has issued operationnal standards, a legal aspect may be raised in case of litigation on the translated document toward the original one issued in local language.	2013 (T2S Milestone)
Germany	In Progress	The companies which are listed in the DAX and M-DAX announce in German and English	Market practice is German language. No implementation date currently foreseen.
Greece	In Progress	Only issuers of "big cap" market segment publish a summary in English. For "small cap" issuers is possible but not obligatory	Within 2010
Italy	In Progress	A moral suasion has to be made in order to convince all issuers, having an international shareholder base, to provide narrative in English,	

Netherlands	In Progress		A uniform formular will be designed for use in different situations between different players in the chain. Major improvements by 2009 Q4
Portugal	Not Implemented	Currently, the announcements are only provided in Portuguese. Note: sometimes the announcements disclosed by CMVM are in English and in Portuguese.	Not planned
Spain	Not Implemented	Only some issuers already translate into English their announcements. Legal Barrier. There is not any spanish law that envisages this obligation.	High level. Legal Barrier
Sweden	In Progress	When narrative is provided to the CSD it is usually in Swedish only.	Discuss with stock exchange and/or issuer representatives.
Switzerland	Implemented	Correct assessment difficult, information about shareholder base not available	
United Kingdom	Implemented		

#### Standard 4

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	The standard is met if information about pending transaction is requested via a service level agreement or in the general terms and conditions.	
Belgium	In Progress	EBE partially OK - but no for pending transactions, NBB N/A	EBE implementation end 2010 (SP Custody launch)
Denmark	Implemented	All participants have/get the information regardless of holding	
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	In Progress	CSD publishes all announcements without undue delay of receipt by the issuer in its website without addressing the information exclusively to participants	Within 2010 (only to participants who have a direct holding)
Italy	Implemented		
Netherlands	Implemented		
Portugal	In Progress	The information related to quantities and provisional amounts to be paid is only disclosed to participants with account positions. Currently, this information is not communicated to the participants who have pending transactions.	Not planned
Spain	Implemented		
Sweden	Implemented	The Corporate Actions information system from the CSD, SI, sends all information to all SI subscribers	
Switzerland	Implemented		
United Kingdom	Implemented		

#### Standard 5

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	In Progress	EBE partially OK - but not for new transactions, NBB N/A	EBE implementation end 2010 (SP Custody launch)
Denmark	Implemented	See 4	
Estonia	Implemented		

Finland	Implemented		
France	In Progress - Market at least 50% compliant	This requirement is currently met in "SLAB" system but not in all the ESES scope.	Linked to SP Custody (ESES EUI) delivery
Germany	Implemented		Market practice.
Greece	In Progress		Within 2010
Italy	Implemented		
Netherlands	Implemented		
Portugal	In Progress	This communication is made to any participant who obtains a new holding but not to pending transactions (see answer to standard 5).	Not planned
Spain	Implemented		
Sweden	Implemented	The Corporate Actions information system from the CSD, SI, sends all information to all SI subscribers	
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 6

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	In Progress	VP and relevant domestic market participants are working on a proposal for solutions to the mentioned standards as a consequence of the fact that the infrastructure on the Danish market does not fully comply with the standard. Solutions for the standard are processed jointly and are included as elements in the development of a new announcement infrastructure. The proposals will probably require change of domestic rules and regulations.	
Estonia	Not Implemented		
Finland	In Progress	by default information is currently provided in free-text format. Proprietary format information delivery is available at extra cost.	
France	In Progress - Market less than 50% compliant	The current issuer CSD format is a proprietary format. This will be enhance with the implementation of SP Custody	Linked to SP Custody (ESES EUI) delivery
Germany	Implemented		Market practice.
Greece	In Progress		Within 2010
Italy	Implemented	depending on users choice	
Netherlands	Implemented		
Portugal	In Progress	Interbolsa's communication with its participants is done electronically using a proprietary communication protocol.	Not planned
Spain	Implemented	The Information is communicated in formatted electronic form, but not in ISO standards. Iberclear is analysing with the market participants the possibility of implementing the MT564 message for the information distribution.	
Sweden	In Progress	Proprietary interface	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Implemented		
United Kingdom	In Progress	Available in ISO format but primarily	Q4 2010

		distributed in proprietary format	
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### Standard 7

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	The Issuer (I)CSD announces the reason of the reversal with the reversal of a payment.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented	Information would be sent to all concerned parties.Process for cash: Issuers need to ask each custodian/bank to reverse the payment. Process for securities: No system functionality - approx. the same as for cash	
Switzerland	In Progress	Practice observed, no monitoring process in place	Monitored by the CSD as of 2010/11
United Kingdom	Implemented		

### Standard 8

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	In Progress	retail OK, wholesale not ok for pending and new transactions depending on the intermediary	To be discussed within the market
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented	Content of the point was considered to be service level agreement issue. Particularly, when concerning the end investor but also in relation to intermediary relationships.	
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		
Sweden	In Progress	Not all intermediaries can send on pending, only on holdings. The CSD only notifies those direct holders that have a holding.	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 9

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	The standard is met if requested via a service level agreement.	
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented	The Information is communicated in formatted electronic form. For those intermediaries who have SWIFT connectivity, the information flow is ISO compliant.	
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 10

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented	Information is communicated to non-intermediaries per default. The client has the possibility to opt out (and opt in again) the distribution of some information in the SLA.	
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	In Progress	Only banks communicate the information to intermediaries using ISO standards	It seems difficult for all other market participants to use ISO standards due to the cost of such systems
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 11

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	No legal regulation	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	In Progress		
Finland	Implemented		
France	Implemented		

Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	According to CMVM Regulation no. 5/2008 (Article 7, no. 3), the public announcement by the Issuer of the dividend payment should be made no later than 10 business days before Payment Date.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 12

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	No legal regulation	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	Not OK for price sensitive events	To be discussed with the Issuers (at European level)
Denmark	Implemented		
Estonia	Not Implemented		
Finland	In Progress	detailed regulations currently missing	
France	Implemented	Current Market practices show that this period is more than this minimum of 10 days requirement.	
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Not Implemented		To be analysed by dedicated DuMIG subgroup. Interim analysis aimed at by 2009 Q4
Portugal	Implemented		
Spain	Not Implemented	There is not any rule where the start of the election period is envisaged. A market practice should be implemented.	High level. Legal Barrier
Sweden	Implemented	It is the opinion of the MIG that the current practice meets the standard of 'as close as possible'. In practice, almost all events have a period of action of at least two weeks. Legally, the only event type that is covered is rights issue, where the requirement is at least two weeks from record date. If issuer provides other options than exercise, tender etc., such as sell unwanted entitlement to the issuer, these may have an even earlier market deadline.	
Switzerland	In Progress		2010/11
United Kingdom	Implemented	Met in the vast majority of cases	

### Standard 13

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	No legal regulation	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Not Implemented	No buyer protection	To be discussed within the market (MEC Sept). End 2009

Denmark	Implemented	Handled by maket participants	
Estonia	Not Implemented		
Finland	Not Implemented	currently no Buyer protection implemented	
France	Implemented		
Germany	N/A	We do not offer "Buyer Protection" in Germany as is proposed optionally in the Standards, but have a different process (compensation scheme).	Not applicable.
Greece	Not Implemented		
Italy	Not Implemented		To be discussed with industry
Netherlands	Not Implemented	No buyer protection provided in NL	To be analysed by dedicated DuMIG subgroup. Interim analysis aimed at by 2009 Q4
Portugal	Not Implemented	Buyer protection has not been impleted yet	Not planned
Spain	N/A	Not applicable. Buyer Protection not implemented.	
Sweden	Not Implemented	No buyer protection exist	The possibility for buyer protection will be implemented with the Single Platform (2012). However, the market has not yet decided if BP will be used.
Switzerland	Not Implemented	Possible BP process details to be discussed with whole community (infrastructure, banks etc.)	
United Kingdom	Not Implemented	Question this standard - requires clarification and appears to have a detrimental affect on processing efficiency. To be queried to the Corporate Actions Joint Working Group.	

#### Standard 14

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	No legal regulation	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Not Implemented	No buyer protection	To be discussed within the market (MEC Sept). End 2009
Denmark	Implemented	Handled by maket participants	
Estonia	Not Implemented		
Finland	Not Implemented	currently no Buyer protection implemented	
France	Implemented		
Germany	N/A	We do not offer "Buyer Protection" in Germany as is proposed optionally in the Standards, but have a different process (compensation scheme).	Not applicable.
Greece	Not Implemented		
Italy	Not Implemented		To be discussed with industry
Netherlands	Not Implemented	No buyer protection provided in NL	To be analysed by dedicated DuMIG subgroup. Interim analysis aimed at by 2009 Q4
Portugal	Not Implemented	Buyer protection has not been impleted yet	Not planned
Spain	N/A	Not applicable. Buyer Protection not implemented.	
Sweden	Not Implemented	No buyer protection exist	The possibility for buyer protection will be implemented with the Single Platform (2012). However, the market has not yet decided if BP will be used.
Switzerland	Not Implemented	Possible BP process details to be discussed with whole community (infrastructure, banks etc.)	
United Kingdom	Implemented		

### Standard 15

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	No legal regulation	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented	Handled by market participants	
Estonia	Not Implemented		
Finland	In Progress	currently sometime after Market Deadline	
France	In Progress - Market less than 50% compliant	Currently there is a 3 days delays after "market deadline". A general study on reorganisation key dates will begin in next October. This issue will be in the scope of this study. This may raise not only STP aspects but also legal aspects in connection with securities out turn.	T2S
Germany	Implemented		Market practice.
Greece	Not Implemented	Usually payment date comes no earlier than 5 BD days after Record Date	To be reviewed within 2010
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Payment Date is always the next business day following Record Date.	
Spain	Implemented		
Sweden	Implemented	1 or 2 BDs	
Switzerland	In Progress	Practice observed, no monitoring process in place	Monitored by the CSD as of 2010/11
United Kingdom	Implemented	Note that the Takeover Directive and market practice will not allow PD to be the day after Market Deadline in most cases.	

### Standard 16

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 17

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	No legal regulation	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	In Progress	Standard not always met	



Estonia	Implemented		
Finland	Not Implemented	New ISIN is not issued for all outturn securities	
France	Implemented		
Germany	Implemented		Market practice.
Greece	In Progress	In case of reverse splits, mergers, conversions of shares to another type - non registered to registered - a different ISIN will be allocated to the outturn security.	No plans for implementation
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	An ISIN is allocated to each outturn security. When the securities become fungible with the main issue they will be consolidated, which may happen on the Payment Date.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	In Progress		2010/11
United Kingdom	Implemented		

### Standard 18

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	No legal regulation	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	In Progress	In cases where 17 is met standard 18 is met (ISIN is a unique identifier)	
Estonia	Not Implemented		
Finland	Not Implemented	no such identifiers currently used	
France	In Progress - Market less than 50% compliant	This issue is not a technical problem but belong to market practices. It involves swift NMPG standardisation that will have to be taken in account in SP Custody and all french securites players.	SP Custody (ESES EU)
Germany	In Progress	Typically Issuer don't pretend a unique identifier, but (I)CSD and participants use a unique identifier	Market practice.
Greece	Not Implemented		Within 2010
Italy	Not Implemented		To be discussed with industry
Netherlands	Not Implemented	In most cases, the Issuer does not provide a unique identifier	Issuers and Issuer Agents are in key position to enforce standard; to be analysed, possibly with uniform formular.
Portugal	Implemented		
Spain	Not Implemented	The information is not communicated in formatted electronic and the Issuer does not provide a unique identifier for each option. A Regulator's rule should envisage a market practice.	High level. Legal Barrier
Sweden	In Progress	Options are not given a specific identifier	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	In Progress		2010/11
United Kingdom	Implemented		

### Standard 19

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	No legal regulation- especially communication between CSD and issuer	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	not always possible for pendings (physicals to be demat)	
Denmark	Not Implemented		
Estonia	Implemented		
Finland	Not Implemented		
France	In Progress - Market less than 50% compliant	The current issuer CSD format is a proprietary format. This will be enhance with the implementation of SP Custody	Linked to SP Custody (ESES EUI) delivery
Germany	Implemented		
Greece	In Progress	Only banks communicate the information to intermediaries using ISO standards	It seems difficult for all other market participants to use ISO standards due to the cost of such systems
Italy	Implemented		
Netherlands	Not Implemented	In many cases messages are fragmented	To be analysed by dedicated DuMIG subgroup. Interim analysis aimed at by 2009 Q4
Portugal	Implemented		
Spain	Implemented		
Sweden	Not Implemented	Most instructions between intermediaries are sent electronically. Instructions to the issuer are not sent via the CSD and are not sent electronically.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 20

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	In Progress		To be discussed with the market
Denmark	Not Implemented		
Estonia	Not Implemented		
Finland	Not Implemented	Exchange of original holding to a technical security to represent elected underlying securities should be an accepted solution.	
France	Implemented		
Germany	Implemented	Separation by the (D)CSD and all Intermediaries via blocking by safe keeping parameter or on sub account	Market practice.
Greece	Implemented		
Italy	In Progress	The election is not booked but binding	
Netherlands	In Progress		To be analysed by dedicated DuMIG subgroup. Interim analysis aimed at by 2009 Q4
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented	The CSD can only act upon the instruction received from the issuer. The securities can be moved to a segregated account in the CSD for later processing. The intermediaries either block or move to a separate account.	
Switzerland	Not Implemented	Process to be discussed with the whole community (infrastructure, banks etc.)	
United Kingdom	Implemented	Note the difference between 'registered	

		holder default' and open market position default.	
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### Standard 21

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		
Greece	Implemented		
Italy	Not Implemented		To be discussed with industry
Netherlands	Not Implemented	In many cases, the Issuer does not provide a default option	To be analysed by dedicated DuMIG subgroup. Interim analysis aimed at by 2009 Q4
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented	The default option is included in the prospectus, but not as an option as such. Intermediaries provide their clients with a default option, either specifically mentioned or included in the account agreement.	
Switzerland	Not Implemented	Process to be discussed with the whole community (infrastructure, banks etc.)	
United Kingdom	Implemented		

### Standard 22a

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented	It is not obligatory by law to make the payments through the Issuer (I) CSD, the Issuers can choose the payment agent (CSD, commercial bank) or process payments themselves. If payments are made through the CSD, the same Payment mechanism as for other cash transactions through the Issuer (I) CSD is used.	
Finland	In Progress	Equities market - payment outside settlement system Fixed income market - payment in settlement system	
France	Implemented		
Germany	Implemented		
Greece	N/A		
Italy	Implemented	as from BICOMP (payment system) rules, payment instructions are irrevocable after 10:30 and cash settlement instructions are sent within 12:00	
Netherlands	Implemented		
Portugal	Implemented		
Spain	Not Implemented	Some payments are not made in Central Bank money since Art. 215 L.S.A. envisages the possibility of make the payment directly at the Issuer's Registered Address.	High level. Legal Barrier
Sweden	Not Implemented	The payments are not made in central bank	This gap will be discussed in the

		money, and not via the CSD as such.	Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 22b

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented	Fx may occur for income pmt of locally listed, non-resident companies	
France	Implemented		
Germany	Implemented		
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 22c

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Not Implemented	EBE: not OK - current recommended deadline is 2/3 pm, NBB : N/A	To be discussed within the market (MEC Sept)
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		
Greece	Implemented		
Italy	Implemented	as from BICOMP (payment system) rules, payment instructions are irrevocable after 10:30 and cash settlement intructions are sent within 12:00	
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented	Some payments are done after midday in order to avoid potential risks for the Agent Bank.	
Sweden	Not Implemented	Payments can be made until 2 pm	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	Implemented	Met for vast majority of events. Issuer agents will only distribute payments when in receipt of funds from the Issuer	

### Standard 22d

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Not Implemented	We agree but cannot always comply. If the payment is completed it cannot be reversed by the CSD (legal matter)	
Estonia	Implemented		
Finland	In Progress	There is not a market standard and process may vary from Intermediary to Intermediary. In case of additional credit, the payment is processed as separate additional payment.	
France	In Progress - Market less than 50% compliant	This case is marginal in France but may be applied through the CSD. The implementation target is to be seen as a milestone but not a dependance on the SP Custody delivery	SP Custody (ESES EUI)
Germany	Implemented		
Greece	Implemented		
Italy	Not Implemented	MT does not reverse the whole payment, rather it makes adjustments in the paid amount	To be discussed with industry
Netherlands	Implemented		
Portugal	Implemented		
Spain	Not Implemented	No complete reversal of the Payment is done. The difference is credited or debited depending on the case.	High level
Sweden	In Progress	Cash: Issuers can only ask for a reversal - reversals rarely occur. Securities: It is possible for the CSD to reverse a payment of securities. However, if settlement of trades have occurred in the securities it may be both desired and necessary to debet the actual holdings rather than the holdings as of pay date.	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Finland	Implemented		
United Kingdom	Implemented		

### Standard 23a

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	-	-	-
Finland	Implemented		
France	In Progress - Market at least 50% compliant	This is linked to Issuer's capacity to deal securities on "Pay Date". Two cases may occur. Default action, then the availability of new securities is dependant on the green light per default seen item. When SP Custody will be implemented, the securities distribution should depend on a greenlight given by the Payment agent. The final process of this greenlight for this kind of distributions is to be finetuned. Due to current operationnal constaints and considering the current procedures, this greenlight could occur only on Pay Date. As a	T2S

		result, involved securities would not be available when the settlement system open but the day after. In such case, the 23(a) requirement would not be met. In case of an option, the result in Pay Date will depend on the issuer capacity to deliver the new securities. It is then more a problem of Market Practice on the issuer side.	
Germany	Implemented		
Greece	Implemented		
Italy	In Progress	Disbursed securities are paid by the issuer to MT within the deadline specified in the standard. Such securities, however, are credited to participants on time, but they are blocked until confirmation of cash settlement on behalf of the issuer, when applicable.	MT is going to revise the cash settlement process, thus to make disbursed securities immediately available to participants. It will be operating in december 2010
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented	Due to the timing of Listing Announcement (8:00am) it is not possible to distribute at the point of opening the Settlement system (6:00am). Question whether the spirit of the recommendation has been met as the distribution is typically made directly after Listing is granted. Securities Listing occurs when the London Stock Exchange opens at 8:00am. The CSD opens at 6:00am. It cannot pay out securities that are not yet listed when the system opens at 6:00am, therefore payment will take place only at 8:00am.	

### Standard 23b

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	It must be possible to “ROUND UP AND DOWN” If the issuer sets a price for the compensation of fractional shares, it must be possible to settle total amounts of fractions for several accounts against the issuer. (Issuer has to compensate fractions of end investors).	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Not Implemented		To be discussed with the Issuers
Denmark	Implemented		
Estonia	Not Implemented	Rounding rules are determined by the Issuer.	
Finland			
France	In Progress - Market less than 50% compliant	In case of a default action, as top down method is to be applied, this is not currently applicable in France. It will be implemented with SP Custody. For option management, the bottom up method will apply, which is currently applied in the French Market.	SP Custody (EUI)
Germany	N/A	Processing is top down, but Clearstream banking is able to process fractional amounts of securities to 3 decimal places. Round down occurs to this level.	Not applicable.
Greece	Implemented		

Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		
Sweden	Implemented	This is the most common method, but the issuer can also choose to round up.	
Switzerland	In Progress	Mostly observed, exceptions possible	2010/11
United Kingdom	Implemented		

### Standard 23c

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented	reference price can not be guaranteed by intermediary if not guaranteed by the Issuer	
Denmark	Implemented		
Estonia	Implemented		
Finland			
France	In Progress - Market less than 50% compliant	Same comment as 23 b.	SP Custody (EUI)
Germany	N/A	There is no CINL cash compensation in the German Market. Fractions of securities are distributed.	Not applicable
Greece	N/A	Fractions compensation takes place later and irrespective of the event's payment datesince. Furthermore farctions are calculated on the end client level	
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	In Progress	Mostly observed, exceptions possible	2010/11
United Kingdom	Implemented		

### 3.4.3 Mandatory Reorganisations

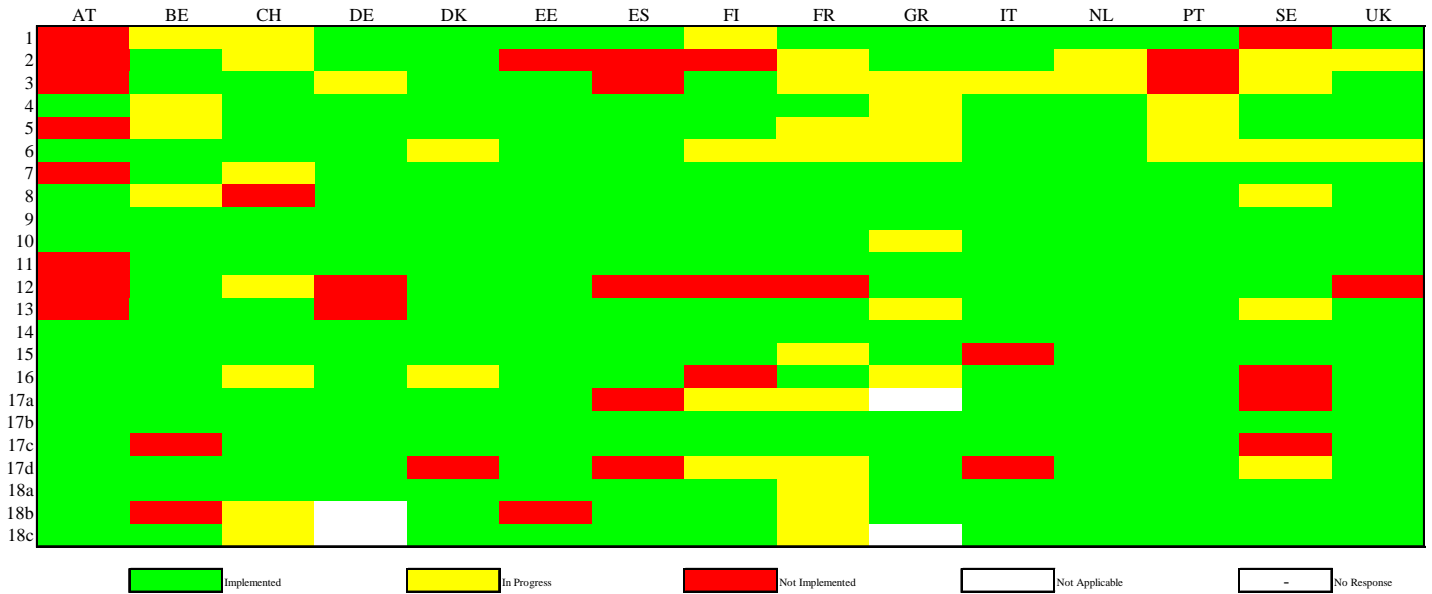


Figure 9: Overview Mandatory Reorganisations

#### Standard 1

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. There is no legal basis for a direct announcement process between issuer or issuer's agent and the CSD.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress		Issuer should determine buyer protection, last trading date in their announcement
Denmark	Implemented		
Estonia	Implemented		
Finland	In Progress	In Finland data content is not equal to standard and time schedule is more flexible	
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	According to Interbolsa's rules all issuers must advise Interbolsa of any corporate action within 15 days in advance. As a result, Interbolsa knows the event before its announcement to the market.	
Spain	Implemented		
Sweden	Not Implemented	Most issuers wait until later. The ISIN cannot be included in the official announcement, since it cannot be requested before it. However, the ISIN is generally not provided as soon as possible. No compensation price for fractions is announced - but the method of determining the price is usually announced.	Discuss with stock exchange and/or issuer representatives.
Switzerland	In Progress	Flow to (I)CSD not synchronised with public	2010/11



		announcement	
United Kingdom	Implemented		

## Standard 2

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. There is no legal basis for a direct announcement process between issuer or issuer's agent and the CSD. Currently there is no ISO 15022/20022 standards for issuer-CSD communication available, only issuers-agent (bank) ought to communicate with the CSD.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented	Domestically we use a proprietary format containing the same information as the ISO standard	
Estonia	Not Implemented	The issuer informs ECSD of corporate events by filling out the application form specified by ECSD which is available at the website of ECSD.	
Finland	Not Implemented	information provided in non-electronic format	
France	In Progress - Market less than 50% compliant	The current issuer CSD format is a proprietary format. This will be enhance with the implementation of SP Custody	Linked to SP Custody (ESES EUI) delivery
Germany	Implemented	Issuers generally inform via WM, onward communication from CSD to market participants is electronic.	Market practice.
Greece	Implemented	A web-based proprietary system (HERMES) is used for all information that issuers announce to the Exchange and CSD.	
Italy	Implemented	Mt-X is the main communication channel for the relation of issuers vis à vis Monte Titoli. Therefore, we are compliant because of the use of formatted electronic forms, but the information flow is not an ISO standard	This issue is not important for Monte Titoli since all Italian issuers participating to Monte Titoli have adapted to the format in use.
Netherlands	In Progress	Various messages vary in timeliness, content and completeness	A uniform formular will be designed for use in different situations between different players in the chain. Major improvements by 2009 Q4
Portugal	Not Implemented	The information received by Interbolsa from issuers is not sent electronically.	Not planned
Spain	Not Implemented	Iberclear is analysing the possibility of implementing the ISO message that it is being developed by SWIFT 20022. Standard messages for Corporate Actions are not available in ISO 15022.	High level
Sweden	In Progress	The communication is done in formatted form via a web interface, but not in ISO standards. The format and content will support ISO messages further down the chain to the intermediaries.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	In Progress		2010/11
United Kingdom	In Progress	Introduced alongside implementation of the Euroclear Single Platform Custody development.	Q4 2010

### Standard 3

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. There is no legal basis for a direct announcement process between issuer or issuer's agent and the CSD. Currently there is no need for a translation into English by law. The narrative text in the information should be at least in english whether or not a international shareholder base exists.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented	Today, it is not required that corporate action announcements are delivered together with a translation into English. However, as regards information from public listed companies, translations into English are delivered in estimated 80-90 percent of all announcements.	
Estonia	Implemented	According to clause 2.4.5 of the section "Requirements to issuers" of the Rules of Procedure of the Tallinn Stock Exchange, all stock market releases and financial reports must be made public both in the Estonian and English language. In case of corporate actions of those issuers whose securities are not tradable on a regulated market, there is no such direct legal obligation, but, if possible, it is recommended to add a summary in English about the event.	
Finland	Implemented	some issuers do not provide narrative in English	
France	In Progress - Market at least 80% compliant	This item is not an issue in terms of system enhancement but a matter of practices. It is fully dependent on the ability of an issuer to provide this information in english. This is mainly the case today but few exceptions may still remain. Implementation shall be seen then only as a matter of practices evolution for these remaining exceptional cases. Moreover, even if the CAJWG has issued operationnal standards, a legal aspect may be raised in case of litigation on the translated document toward the original one issued in local language.	T2S
Germany	In Progress	The companies which are listed in the DAX and M-DAX announce in German and English.	Market practice is German language. No change foreseen. Legislation is required and an estimated implementation date cannot be provided at this time.
Greece	In Progress	Only issuers of "big cap" market segment publish a summary in English. For "small cap" issuers is possible but not obligatory	Within 2010
Italy	In Progress	A moral suasion has to be made in order to convince all issuers, having an international shareholder base, to provide narrative in English,	
Netherlands	In Progress		A uniform formular will be designed for use in different situations between

			different players in the chain. Major improvements by 2009 Q4
Portugal	Not Implemented	Currently, the announcements are only provided in Portuguese. Note: sometimes the announcements disclosed by CMVM are in English and in Portuguese.	Not planned
Spain	Not Implemented	Only some issuers already translate into English their announcements. Legal Barrier. There is not any spanish law that envisages this obligation.	High level. Legal Barrier
Sweden	In Progress	Narrative is seldom used in the communication of mandatory reorganisations to the CSD, but when provided it is usually in Swedish only.	Discuss with stock exchange and/or issuer representatives.
Switzerland	Implemented	Correct assessment difficult, information about shareholder base not available	
United Kingdom	Implemented		

#### Standard 4

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	The standard is met if information about pending transaction is requested via a service level agreement or in the general terms and conditions.	
Belgium	In Progress	EBE partially OK - but no for pending transactions, NBB: N/A	EBE implementation end 2010 (SP Custody launch)
Denmark	Implemented	All participants have/get the information regardless of holding	
Estonia	Implemented	Information is made available on the corporate actions web-page of the Estonian CSD and distributed to its participants via SWIFT or email by ISO standard messages.	
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	In Progress	CSD publishes all announcements without undue delay of receipt by the issuer in its website without addressing the information exclusively to participants.	Within 2010 (only to participants who have a direct holding)
Italy	Implemented		
Netherlands	Implemented		
Portugal	In Progress	The information related to quantities and provisional amounts to be paid is only disclosed to participants with account positions. Currently, this information is not communicated to the participants who have pending transactions.	Not planned
Spain	Implemented		
Sweden	Implemented	The Corporate Actions information system from the CSD, SI, sends all information to all SI subscribers	
Switzerland	Implemented		
United Kingdom	Implemented		

#### Standard 5

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for	In coordination with the members of CANIG Austria. Meeting in 09/09 -

		implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date.	10/09.
Belgium	In Progress	EBE partially OK - but not for new transactions, NBB: N/A	EBE implementation end 2010 (SP Custody launch)
Denmark	Implemented	See 4.	
Estonia	Implemented	Information is made available on the corporate actions web-page of the Estonian CSD and distributed to its participants via SWIFT or email by ISO standard messages.	
Finland	Implemented		
France	In Progress - Market at least 50% compliant	This requirement is currently met in "SLAB" system but not in all the ESES scope.	Linked to SP Custody (ESES EUI) delivery
Germany	Implemented		Market practice.
Greece	In Progress		Within 2010
Italy	Implemented		
Netherlands	Implemented		
Portugal	In Progress	This communication is made to any participant who obtains a new holding but not to pending transactions (see answer to standard 5).	Not planned
Spain	Implemented		
Sweden	Implemented	The Corporate Actions information system from the CSD, SI, sends all information to all SI subscribers	
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 6

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	In Progress	VP and relevant domestic market participants are working on a proposal for solutions to the mentioned standards as a consequence of the fact that the infrastructure on the Danish market does not fully comply with the standard. Solutions for the standard are processed jointly and are included as elements in the development of a new announcement infrastructure. The proposals will probably require change of domestic rules and regulations.	
Estonia	Implemented		
Finland	In Progress	by default information is currently provided in free-text format. Proprietary format information delivery is available at extra cost.	
France	In Progress - Market less than 50% compliant	The current issuer CSD format is a proprietary format. This will be enhance with the implementation of SP Custody	Linked to SP Custody (ESES EUI) delivery
Germany	Implemented		Market practice.
Greece	In Progress		Within 2010
Italy	Implemented	depending on users choice	
Netherlands	Implemented		
Portugal	In Progress	Interbolsa's communication with its participants is done electronically using a proprietary communication protocol.	Not planned
Spain	Implemented	The Information is communicated in	

		formatted electronic form, but not in ISO standards. Iberclear is analysing with the market participants the possibility of implementing the MT564 message for the information distribution.	
Sweden	Not Implemented	Proprietary interface	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Implemented		
United Kingdom	In Progress	Available in ISO format but primarily distributed in proprietary format	Q4 2010

### Standard 7

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	The Issuer (I)CSD announces the reason of the reversal with the reversal of a payment.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented	This case is marginal in France	
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented	Information would be sent to all concerned parties. Process for cash: Issuers need to ask each custodian/bank to reverse the payment. Process for securities: No system functionality - approx. the same as for cash	
Switzerland	In Progress	Practice observed, no monitoring process in place	Monitored by the CSD as of 2010/11
United Kingdom	Implemented		

### Standard 8

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	For End Investors, information by means of account statement is deemed sufficient unless provided otherwise in their service level agreement or general terms and conditions.	
Belgium	In Progress	Retail OK, wholesale not ok for pending and new transactions depending on the intermediary	To be discussed within the market
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented	Content of the point was considered to be service level agreement issue. Particularly, when concerning the end investor but also in relation to intermediary relationships.	
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied	

		by the market.	
Spain	Implemented		
Sweden	In Progress	Not all intermediaries can send on pending, only on holdings. The CSD only notifies those direct holders that have a holding.	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Not Implemented		
United Kingdom	Implemented		

### Standard 9

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	The standard is met if requested via a service level agreement.	
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented	The Information is communicated in formatted electronic form. For those intermediaries who have SWIFT connectivity, the information flow is ISO compliant.	
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 10

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented	Information is communicated to non-intermediaries per default. The client has the possibility to opt out (and opt in again) the distribution of some information in the SLA.	
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	In Progress	Only banks communicate the information to intermediaries using ISO standards	It seems difficult for all other market participants to use ISO standards due to the cost of such systems
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 11

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	See Standard 1.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented	Obligatory for Issuers whose securities are traded on the regulated market.	
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	According to CMVM Regulation no. 5/2008 (Article 7, no. 3), the public announcement by the Issuer of the dividend payment should be made no later than 10 business days before Payment Date.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 12

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	See Standard 5.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Not Implemented	In Split and conversion events last trading date is equal to Record date and Ex date follows the Record date	
France	Not Implemented	This is dependent on the result of the "HDR" study. The final milestone is T2S implementation.	T2S
Germany	Not Implemented	Currently the last trading date is 2 days prior to Entitlement Date.	Foreseen for Record Date implementation in 2010 if Issuers agree a voluntarily change of market practice. If Issuers do not agree, then legislation is required and an estimated implementation date cannot be provided at this time. Issuers believe that they will not receive 2/3 majorities at the AGM to change the company by-laws, because the investors will not accept a delay of the payment as well as the change of the actual German market practice. If the issuers could not receive majorities at the AGM to change the company bylaws they believes as well that they will not receive the simple majorities every year on the AGM for a "late payment" The Issuers prefer an EU directive which must be implemented into the German law and change the

			actual demand to pay out immediately after General Meeting
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Not Implemented	Ex-date is always the same date than the payment date, and it is not an explicit date in the announcements. Art. 62 Reglamento de Bolsa envisages that the economic benefits and rights correspond to the buyer from the trade date.	High level. Legal Barrier
Sweden	Implemented	No new ISIN, but otherwise the standard is met.	
Switzerland	In Progress		2010/11
United Kingdom	Not Implemented	UK MIG believes that the last trading date on an underlying security should be the business day before payment date for the event. Legal agreement on cancellation of shares normally takes place after record date. Transformations have already occurred automatically at CSD level.	

### Standard 13

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	See Standard 5.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		To be discussed with the Issuers
Denmark	Implemented		
Estonia	Implemented	Not regulated by legal acts, but highly recommended by Good Practices of Corporate Events.	
Finland	Implemented		
France	Implemented		
Germany	Not Implemented		Foreseen for Record Date implementation in 2010 if Issuers agree a voluntarily change of market practice. If Issuers do not agree, then legislation is required and an estimated implementation date cannot be provided at this time. Issuers believe that they will not receive 2/3 majorities at the AGM to change the company by-laws, because the investors will not accept a delay of the payment as well as the change of the actual German market practice. If the issuers could not receive majorities at the AGM to change the company bylaws they believe as well that they will not receive the simple majorities every year on the AGM for a "late payment" The Issuers prefer an EU directive which must be implemented into the German law and change the actual demand to pay out immediately after General Meeting
Greece	In Progress	Securities outturns do not take place earlier than 2 BD after the Record Date	Within 2010



Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Payment Date is always the next business day following Record Date.	
Spain	Implemented		
Sweden	In Progress	For some events pay date may be record date + 2.	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done (by the latest) with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	Implemented	Note for Mand Reorgs that relate to Takeovers and Mergers the PD wil rarely be the day after the Market Deadline.	

#### Standard 14

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

#### Standard 15

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	In Progress		T2S
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Not Implemented	MT specifies two differents amounts, distinguishing redemption and interests, but within the same event refence number	To be discussed with industry
Netherlands	Implemented		
Portugal	Implemented	Redemption and interest payments are separate processes but the final payment may be netted before being sent to the payment system.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 16

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		To be discussed with the Issuers
Denmark	In Progress	We are making a prestudy that shall describe the covered bonds that is 30 years maturity, fix rate, call-able by debtor, 4 due dates per year. This standard could result in 121 different ISIN codes for each bond, these ISIN codes should be listed at stock exchange, approved by tax authorities etc. These bonds are partly redeemed each due date and these bonds are very common in Denmark. We plan to make a practical solution to avoid the use of that large amount of ISIN codes. This solution will be agreed with the T2S Corporate Action SG. The practical solution will be synchronic in the Danish market and in the coming T2S platform.	The prestudy and the discussions with T2S CA SG should be finished end of 2009
Estonia	Implemented		
Finland	Not Implemented	new ISIN is not issued for all outturn securities (eg. splitted securities etc.). It was discussed that term Outturn security would need more definition. It was unclear for example if this would include all proceedings of a merger (incl. acquiring company ISIN etc.)	
France	Implemented		
Germany	Implemented		Market practice.
Greece	In Progress	In case of reverse splits, mergers, conversions of shares to another type - non registered to registered - a different ISIN will be allocated to the outturn security.	No plans for implementation
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Not Implemented	Splits and reverse splits are not signalled via change of ISIN	This gap will be removed by the latest with the implementation of the Single Platform in Sweden (2012). An earlier removal will be discussed in the Securities Dealers' Association and with the stock exchange.
Switzerland	In Progress		2010/11
United Kingdom	Implemented		

### Standard 17a

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	In Progress	Equities market - payment outside settlement system Fixed income market - payment in settlement system	
France	In Progress - Market at least 50% compliant	The current market practice permits to choose between "Direct Payment" (fully compliant with standard 17(a)) and "Classical Payment"	SP Custody (ESES EUI)

		(not compliant with this standard). With SP Custody, it will still be possible to pay via "classical payment" although not recommended. This item is not a technical issue but a Market Practice one.	
Germany	Implemented		Market practice.
Greece	N/A		
Italy	Implemented	as from BICOMP (payment system) rules, payment instructions are irrevocable after 10:30 and cash settlement instructions are sent within 12:00	
Netherlands	Implemented		
Portugal	Implemented		
Spain	Not Implemented	Some payments are not made in Central Bank money since Art. 215 L.S.A. envisages the possibility of make the payment directly at the Issuer's Registered Address.	High level. Legal Barrier
Sweden	Not Implemented	The payments are made in central bank money via the CSD for all participants holding their interest-bearing securities on PM accounts.	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 17b

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 17c

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Not Implemented	EBE: not OK - current recommended deadline is : 2/3 pm, NBB : N/A	To be discussed within the market (MEC Sept)
Denmark	Implemented	The last euro payment batch (batch cycle 45) is settled at 12.05	
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented	as from BICOMP (payment system) rules, payment instructions are irrevocable after	

		10:30 and cash settlement instructions are sent within 12:00	
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented	Some payments are done after midday in order to avoid potential risks for the Agent Bank.	
Sweden	Not Implemented	Payments can be made until 2 pm, but most payments are made before 10 am	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	In Progress	Met for vast majority of events. Issuer agents will only distribute payments when in receipt of funds from the Issuer	

### Standard 17d

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Not Implemented	We agree but cannot always comply. If the payment is completed it cannot be reversed by the CSD (legal matter)	
Estonia	Implemented		
Finland	In Progress	There is not a market standard and process may vary from Intermediary to Intermediary. In case of additional credit, the payment is processed as separate additional payment.	
France	In Progress - Market less than 50% compliant	This case is marginal in France but may be applied through the CSD. The implementation target is to be seen as a milestone but not a dependance on the SP Custody delivery	SP Custody (ESES EUI)
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Not Implemented	MT does not reverse the whole payment, rather it makes adjustments in the paid amount	To be discussed with industry
Netherlands	Implemented		
Portugal	Implemented		
Spain	Not Implemented	No complete reversal of the Payment is done. The difference is credited or debited depending on the case.	High level
Sweden	In Progress	Cash: Issuers can only ask for a reversal - reversals rarely occur. Securities: It is possible for the CSD to reverse a payment of securities. However, if settlement of trades have occurred in the securities it may be both desired and necessary to debet the actual holdings rather than the holdings as of pay date.	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 18a

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented	Compulsory in case the security has been admitted to trading on a regulated market.	
Finland	Implemented		
France	In Progress	This is linked to Issuer's capacity to deal securities on "Pay Date". The availability of new securities is dependant on the green light per default process. When SP Custody will be implemented, the securities distribution should depend on a greenlight given by the Payment agent. The final process of this greenlight for this kind of distributions is to be finetuned. Due to current operationnal constaints and considering the current procedures, this greenlight could occur only on Pay Date. As a result, involved securities would not be available when the settlement system open but the day after. In such case, the 18(a) requirement would not be met.	Linked to SP Custody (ESES EUI) delivery
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented	Due to the timing of Listing Announcement (8:00am) it is not possible to distribute at the point of opening the Settlement system (6:00am). Question whether the spirit of the recommendation has been met as the distribution is typically made directly after Listing is granted. Securities Listing occurs when the London Stock Exchange opens at 8:00am. The CSD opens at 6:00am. It cannot pay out securities that are not yet listed when the system opens at 6:00am, therefore payment will take place only at 8:00am.	

### Standard 18b

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	It must be possible to "ROUND UP AND DOWN" If the issuer sets a price for the compensation of fractional shares, it must be possible to settle total amounts of fractions for several accounts against the issuer. (Issuer has to compensate fractions of end investors).	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Not Implemented		To be discussed with the Issuers
Denmark	Implemented		
Estonia	Not Implemented	Rounding rules are determined by the Issuer.	
Finland	Implemented		
France	In Progress - Market less than 50% compliant	As top down method is to be applied, this is not currently applicable in France. It will be implemented with SP Custody.	SP Custody (EUI)

Germany	N/A	Processing is top down, but Clearstream banking is able to process fractional amounts of securities to 3 decimal places. Round down occurs to this level.	Not applicable.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		
Sweden	Implemented	This is the most common method, but the issuer can also choose to round up.	
Switzerland	In Progress	Mostly observed, exceptions possible	2010/11
United Kingdom	Implemented		

### Standard 18c

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented	Reference price can not be guaranteed by intermediary if not guaranteed by the Issuer	
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	In Progress - Market less than 50% compliant	As top down method is to be applied, this is not currently applicable in France. It will be implemented with SP Custody.	SP Custody (EUI)
Germany	N/A	There is no CINL cash compensation in the German Market. In general fractions of securities are distributed. For processing of the mandatory reorganisation the German market create "Teilrechte" (partial rights). All "Teilrechte" which could not use for feeding into a new share will transfer from the (I)CSD to the agent / lead manager and the agent / lead manager will execute and commercialize the "Teilrechte" and pay directly the cash amount to the depository bank.	Not applicable. Equivalent market practice to get the standard. No change of current market practice foreseen.
Greece	N/A	Fractions compensation takes place later and irrespective of the event's payment datesince. Furthermore fractions are calculated on the end client level	
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	In Progress	Mostly observed, exceptions possible	2010/11
United Kingdom	Implemented		

### 3.4.4 Voluntary Reorganisations

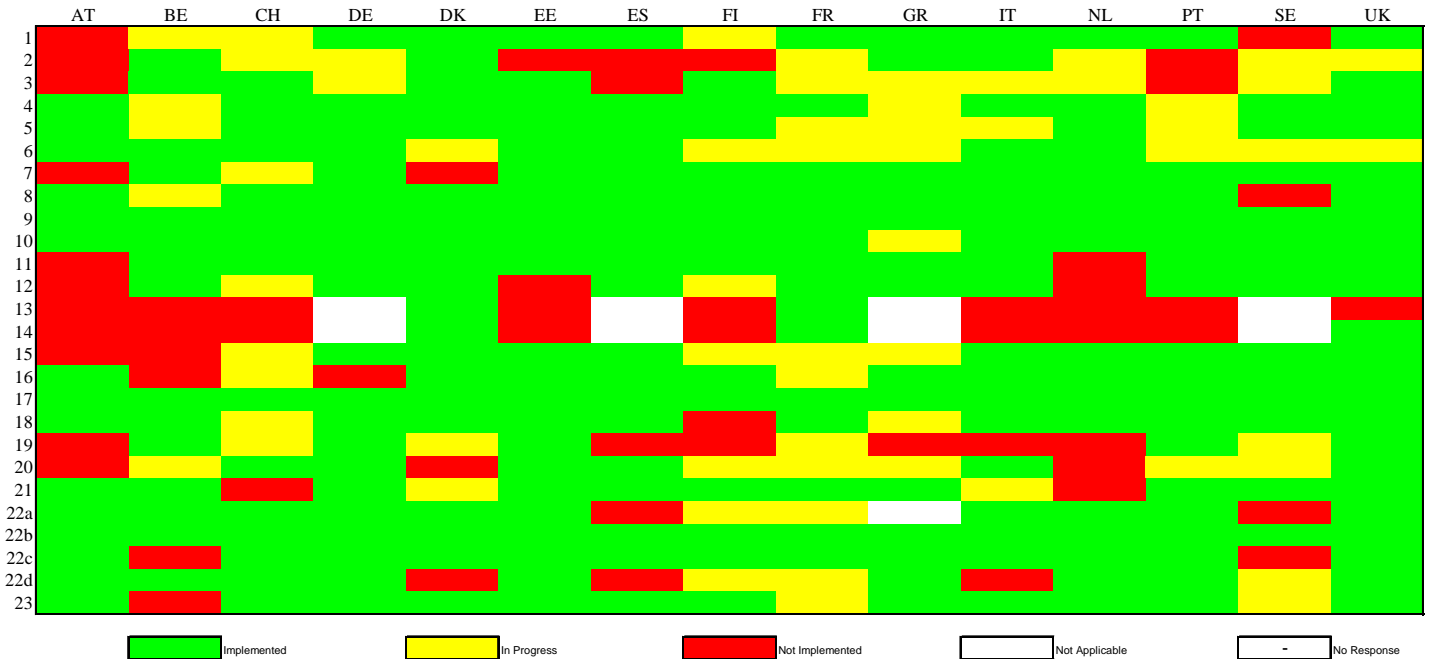


Figure 10: Overview Voluntary Reorganisations

#### Standard 1

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. There is no legal basis for a direct announcement process between issuer or issuer's agent and the CSD.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress		issuer should determine buyer protection, guaranteed participation date in their announcement
Denmark	Implemented		
Estonia	Implemented		
Finland	In Progress	In Finland data content is not equal to standard and time schedule is more flexible	
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	According to Interbolsa's rules all issuers must advise Interbolsa of any corporate action within 15 days in advance. As a result, Interbolsa knows the event before its announcement to the market.	
Spain	Implemented		
Sweden	Not Implemented	Most issuers wait until later. The ISIN cannot be included in the official announcement, since it cannot be requested before it. However, the ISIN is generally not provided as soon as possible.	Discuss with stock exchange and/or issuer representatives.
Switzerland	In Progress	Flow to (I)CSD not synchronised with public	2010/11

		announcement	
United Kingdom	Implemented		

## Standard 2

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. There is no legal basis for a direct announcement process between issuer or issuer's agent and the CSD. Currently there is no ISO 15022/20022 standards for issuer-CSD communication available, only issuers-agent (bank) ought to communicate with the CSD.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented	We use a proprietary format containing the same information as the ISO standard	
Estonia	Not Implemented		
Finland	Not Implemented	information provided in non-electronic format	
France	In Progress - Market less than 50% compliant	The current issuer CSD format is a proprietary format. This will be enhance with the implementation of SP Custody	Linked to SP Custody (ESES EU) delivery
Germany	In Progress	Issuers generally inform via WM, onward communication from CSD to market participants is electronic. Communication in electronic format from Issuer to WM not guaranteed.Potential Quality GAP.	Market practice.
Greece	Implemented	A web-based proprietary system (HERMES) is used for all information that issuers announce to the Exchange and CSD.	
Italy	Implemented	Mt-X is the main communication channel for the relation of issuers vis à vis Monte Titoli. Therefore, we are compliant because of the use of formatted electronic forms, but the information flow is not an ISO standard	This issue is not important for Monte Titoli since all Italian issuers participating to Monte Titoli have adapted to the format in use.
Netherlands	In Progress	Various messages vary in timeliness, content and completeness	A uniform formular will be designed for use in different situations between different players in the chain. Major improvements by 2009 Q4
Portugal	Not Implemented	The information received by Interbolsa from issuers is not sent electronically.	Not planned
Spain	Not Implemented	Iberclear is analysing the possibility of implementing the ISO message that it is being developed by SWIFT 20022. Standard messages for Corporate Actions are not available in ISO 15022.	High level
Sweden	In Progress	The communication is done in formatted form via a web interface, but not in ISO standards. The format and content will support ISO messages further down the chain to the intermediaries.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	In Progress		2010/11
United Kingdom	In Progress	Introduced alongside implementation of the Euroclear Single Platform Custody development	Q4 2010



### Standard 3

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. There is no legal basis for a direct announcement process between issuer or issuer's agent and the CSD. Currently there is no need for a translation into English by law. The narrative text in the information should be at least in english whether or not a international shareholder base exists.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Implemented	Today, it is not required that corporate action announcements are delivered together with a translation into English. However, as regards information from public listed companies, translations into English are delivered in estimated 80-90 percent of all announcements.	
Estonia	Implemented	According to clause 2.4.5 of the section "Requirements to issuers" of the Rules of Procedure of the Tallinn Stock Exchange, all stock market releases and financial reports must be made public both in the Estonian and English language. In case of corporate actions of those issuers whose securities are not tradable on a regulated market, there is no such direct legal obligation, but, if possible, it is recommended to add a summary in English about the event.	
Finland	Implemented	some issuers do not provide narrative in English	
France	In Progress - Market at least 80% compliant	This item is not an issue in terms of system enhancement but a matter of practices. It is fully dependent on the ability of an issuer to provide this information in english. This is mainly the case today but few exceptions may still remain. Implementation shall be seen then only as a matter of practices evolution for these remaining exceptional cases. Moreover, even if the CAJWG has issued operationnal standards, a legal aspect may be raised in case of litigation on the translated document toward the original one issued in local language.	T2S
Germany	In Progress	The companies which are listed in the DAX and M-DAX announce in German and English.	Market practice is German language. No change foreseen. Legislation is required and an estimated implementation date cannot be provided at this time.
Greece	In Progress	Only issuers of "big cap" market segment publish a summary in English. For "small cap" issuers is possible but not obligatory	Within 2010
Italy	In Progress	A moral suasion has to be made in order to convince all issuers, having an international shareholder base, to provide narrative in English,	

Netherlands	In Progress		A uniform formular will be designed for use in different situations between different players in the chain. Major improvements by 2009 Q4
Portugal	Not Implemented	Currently, the announcements are only provided in Portuguese. Note: sometimes the announcements disclosed by CMVM are in English and in Portuguese.	Not planned
Spain	Not Implemented	Only some issuers already translate into English their announcements. Legal Barrier. There is not any spanish law that envisages this obligation.	High level. Legal Barrier
Sweden	In Progress	Narrative is not used much in the communication of voluntary reorganisations to the CSD, but when provided it is usually in Swedish only.	Discuss with stock exchange and/or issuer representatives.
Switzerland	Implemented	Correct assessment difficult, information about shareholder base not available	
United Kingdom	Implemented		

#### Standard 4

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	The standard is met if information about pending transaction is requested via a service level agreement or in the general terms and conditions.	
Belgium	In Progress	EBE partially OK - but no for pending transactions, NBB N/A	EBE implementation end 2010 (SP Custody launch)
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	In Progress	CSD publishes all announcements without undue delay of receipt by the issuer in its website without addressing the information exclusively to participants	Within 2010 (only to participants who have a direct holding)
Italy	Implemented		
Netherlands	Implemented		
Portugal	In Progress	The information related to quantities and provisional amounts to be paid is only disclosed to participants with account positions. Currently, this information is not communicated to the participants who have pending transactions.	Not planned
Spain	Implemented		
Sweden	Implemented	The Corporate Actions information system from the CSD, SI, sends all information to all SI subscribers	
Switzerland	Implemented		
United Kingdom	Implemented		

#### Standard 5

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	In Progress	EBE partially OK - but not for new transactions, NBB: N/A	EBE implementation end 2010 (SP Custody launch)
Denmark	Implemented		

Estonia	Implemented		
Finland	Implemented	currently such information is provided to all NCSD/APK participants	
France	In Progress - Market at least 50% compliant	This requirement is currently met in "SLAB" system but not in all the ESES scope.	Linked to SP Custody (ESES EUI) delivery
Germany	Implemented		Market practice.
Greece	In Progress		Within 2010
Italy	In Progress	Not compliant with reference to tender offer because this corporate action is managed out of the CSD system (it's fully managed on STP basis, but directly between the offeror and the intermediaries; final results are booked in CSD's entries)	
Netherlands	Implemented		
Portugal	In Progress	This communication is made to any participant who obtains a new holding but not to pending transactions (see answer to standard 5).	Not planned
Spain	Implemented		
Sweden	Implemented	The Corporate Actions information system from the CSD, SI, sends all information to all SI subscribers	
Switzerland	Implemented		
United Kingdom	Implemented		

#### Standard 6

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	In Progress	VP and relevant domestic market participants are working on a proposal for solutions to the mentioned standards as a consequence of the fact that the infrastructure on the Danish market does not fully comply with the standard. Solutions for the standard are processed jointly and are included as elements in the development of a new announcement infrastructure. The proposals will probably require change of domestic rules and regulations.	
Estonia	Implemented		
Finland	In Progress	by default information is currently provided in free-text format. Proprietary format information delivery is available at extra cost.	
France	In Progress - Market less than 50% compliant	The current issuer CSD format is a proprietary format. This will be enhanced with the implementation of SP Custody	Linked to SP Custody (ESES EUI) delivery
Germany	Implemented		Market practice.
Greece	In Progress		Within 2010
Italy	Implemented	depending on users choice	
Netherlands	Implemented		
Portugal	In Progress	Interbolsa's communication with its participants is done electronically using a proprietary communication protocol.	Not planned
Spain	Implemented	The Information is communicated in formatted electronic form, but not in ISO standards. Iberclear is analysing with the market participants the possibility of	

		implementing the MT564 message for the information distribution.	
Sweden	In Progress	Proprietary interface	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Implemented		
United Kingdom	In Progress	Available in ISO format but primarily distributed in proprietary format	Q4 2010

### Standard 7

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	The Issuer (I)CSD announces the reason of the reversal with the reversal of a payment.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		
Denmark	Not Implemented	We agree but cannot always comply. If the payment is completed it cannot be reversed by the CSD (legal matter)	
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented	Information would be sent to all concerned parties. Cash: Issuers need to ask each custodian/bank to reverse the payment Securities: No system functionality - approx. the same as for cash	
Switzerland	In Progress	Practice observed, no monitoring process in place	Monitored by the CSD as of 2010/11
United Kingdom	Implemented		

### Standard 8

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	For End Investors, information by means of account statement is deemed sufficient unless provided otherwise in their service level agreement or general terms and conditions.	
Belgium	In Progress	Retail OK, wholesale not ok for pending and new transactions depending on the intermediary	To be discussed within the market
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented	Content of the point was considered to be service level agreement issue. Particularly, when concerning the end investor but also in relation to intermediary relationships.	
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented	to be remarked that only for tender offer notified to CONSOB information to the final retailer is given	

Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		
Sweden	Not Implemented	Not all intermediaries can send on pending, only on holdings. The CSD only notifies those direct holders that have a holding.	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 9

Country	Market Status	Comments	Implementation Plan
Austria	Implemented	The standard is met if requested via a service level agreement.	
Belgium	Implemented		
Denmark	Implemented	We use a proprietary format containing the same information as the ISO standard	
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented	The Information is communicated in formatted electronic form. For those intermediaries who have SWIFT connectivity, the information flow is ISO compliant.	
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 10

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented	Information is communicated to non-intermediaries per default. The client has the possibility to opt out (and opt in again) the distribution of some information in the SLA.	
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	In Progress	Only banks communicate the information to intermediaries using ISO standards	It seems difficult for all other market participants to use ISO standards due to the cost of such systems
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		

Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 11

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	No regulation	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		To be discussed with the Issuers
Denmark	Implemented		
Estonia	Implemented	Obligatory for Issuers whose securities are traded on the regulated market.	
Finland	Implemented		
France	Implemented		
Germany	Implemented	Critical, because many CA will be announce short term by the Issuer	Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Not Implemented		To be analysed by dedicated DuMIG subgroup. Interim analysis aimed at by 2009 Q4
Portugal	Implemented	According to CMVM Regulation no. 5/2008 (Article 7, no. 3), the public announcement by the Issuer of the dividend payment should be made no later than 10 business days before Payment Date.	
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 12

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	No regulation	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		To be discussed with the Issuers
Denmark	Implemented		
Estonia	Not Implemented	Not regulated by legal acts.	
Finland	In Progress	detailed regulations currently missing	
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Not Implemented		To be analysed by dedicated DuMIG subgroup. Interim analysis aimed at by 2009 Q4
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented	It is the opinion of the MIG that the current practice meets the standard, even though there are no formal rules in place for non-listed securities.	
Switzerland	In Progress		2010/11
United Kingdom	Implemented	Met in the vast majority of cases	

### Standard 13

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	Must the issuer announce the Guaranteed Participation Date and the Buyer Protection Deadline in the announcement? – We understand that these dates are simply calculated from the announced market deadline. As we suggest The Guaranteed Participation Date and the Buyer Protection as optional the last trading date should be settlement cycle plus one day before the Market Deadline.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Not Implemented		To be discussed with the Issuers and the Market infrastructure (NYX)
Denmark	Implemented	Handled by maket participants	
Estonia	Not Implemented		
Finland	Not Implemented	currently no Buyer protection implemented	
France	Implemented		
Germany	N/A	Buyer protection not applicable in the German market.	Not applicable.
Greece	N/A		
Italy	Not Implemented		To be discussed with the industry
Netherlands	Not Implemented		To be analysed by dedicated DuMIG subgroup. Interim analysis aimed at by 2009 Q4
Portugal	Not Implemented	Buyer protection has not been impleted yet	Not planned
Spain	N/A	N.A. Buyer protection not implemented	
Sweden	N/A	No buyer protection exist	A possible implementation of buyer protection will be discussed in the WGs for migration to the Single Platform. If the market agrees to implement BP, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Not Implemented	Possible BP process details to be discussed with whole community (infrastructure, banks etc.)	
United Kingdom	Not Implemented	Question this standard - requires clarification and appears to have a detrimental affect on processing efficiency. To be queried to the Corporate Actions Joint Working Group.	

### Standard 14

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	Must the issuer announce the Guaranteed Participation Date and the Buyer Protection Deadline in the announcement? – We understand that these dates are simply calculated from the announced market deadline. As we suggest The Guaranteed Participation Date and the Buyer Protection as optional the last trading date should be settlement cycle plus one day before the Market Deadline.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Not Implemented		To be discussed with the Issuers and the Market infrastructure (NYX)
Denmark	Implemented	Handled by maket participants	
Estonia	Not Implemented		
Finland	Not Implemented	currently no Buyer protection implemented	
France	Implemented		

Germany	N/A	Buyer protection not applicable in the German market.	Not applicable.
Greece	N/A		
Italy	Not Implemented		To be discussed with the industry
Netherlands	Not Implemented	No buyer protection provided in NL	To be analysed by dedicated DuMIG subgroup. Interim analysis aimed at by 2009 Q4
Portugal	Not Implemented	Buyer protection has not been impleted yet	Not planned
Spain	N/A	N.A. Buyer protection not implemented	
Sweden	N/A	No buyer protection exist	A possible implementation of buyer protection will be discussed in the WGs for migration to the Single Platform. If the market agrees to implement BP, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Not Implemented	Possible BP process details to be discussed with whole community (infrastructure, banks etc.)	
United Kingdom	Implemented		

### Standard 15

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	No regulation	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Not Implemented		To be discussed with the Issuers and the Market infrastructure (NYX)
Denmark	Implemented	Handled by maket participants	
Estonia	Implemented		
Finland	In Progress	currently sometime after Market Deadline	
France	In Progress - Market less than 50% compliant	Currently there is a 3 days delays after "market deadline". A general study on reorganisation key dates will begin in next October. This issue will be in the scope of this study. This may raise not only STP aspects but also legal aspects in connection with securities out turn.	T2S
Germany	Implemented		Market practice.
Greece	In Progress	Securities outturns do not take place earlier than 2 BD after the Market Deadline	Within 2010
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Payment Date is always the next business day following Record Date.	
Spain	Implemented		
Sweden	Implemented	It is the opinion of the MIG that the current practice meets the standard, though there are usually at least several BDs - depending on the proceeds (securities must be issued, cash is quicker) and the amount of options and number of (retail) shareholders between market deadline and pay date for tender offers. For events with rolling pay dates the standard is met.	
Switzerland	In Progress	Practice observed, no monitoring process in place	Monitored as of 2010/11
United Kingdom	Implemented	Note that the Takeover Directive and market practice does not require PD to be the day after Market Deadline in most cases and	



		therefore for these events we expect the current 10 day settlement period to remain.	
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### Standard 16

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Not Implemented		To be discussed with the Issuers and the Market infrastructure (NYX)
Denmark	Implemented		
Estonia	Implemented	Applicable for securities traded on the regulated market.	
Finland	Implemented		
France	In Progress - Market less than 50% compliant	This depends on the "HDR" study that will have to implement dates chronology. Depending on the results of this study, the implementation calendar will be designed	T2S
Germany	Not Implemented	(I)CSD does not publish this information. The information is now and then available by WM depending on the forwarding by the issuers or their agents. Forwarding is usually not supported by the banks or their agents. Informations are available on Issuers website too.	Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented	Interbolsa believes this standard is complied by the market.	
Spain	Implemented		
Sweden	Implemented	It is the opinion of the MIG that the current practice meets the standard since a results publication date exists, even though it is usually a few BDs after market deadline since the manual processing of instructions take some time. Pay date is close to the results publication date, but the exact relation varies with the proceeds.	
Switzerland	In Progress		2010/11
United Kingdom	Implemented		

### Standard 17

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 18

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Not Implemented	new ISIN is not issued for all outturn securities	
France	Implemented		
Germany	Implemented		Market practice.
Greece	In Progress	In case of reverse splits, mergers, conversions of shares to another type - non registered to registered - a different ISIN will be allocated to the outturn security.	No plans for implementation
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	In Progress		2010/11
United Kingdom	Implemented		

### Standard 19

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	No regulation	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented		To be discussed with the Issuers
Denmark	In Progress	Standard not always met	
Estonia	Implemented		
Finland	Not Implemented	no such identifiers currently used	
France	In Progress - Market less than 50% compliant	This issue is not a technical problem but belong to market practices. It involves swift NMPG standardisation that will have to be taken in account in SP Custody and all french securites players.	SP Custody (ESES EUI)
Germany	Implemented		Market practice.
Greece	Not Implemented		Within 2010
Italy	Not Implemented		To be discussed with the industry
Netherlands	Not Implemented	In most cases, the Issuer/Offeror does not provide a unique identifier	Issuers and Issuer Agents are in key position to enforce standard; to be analysed, possibly with uniform formular
Portugal	Implemented		
Spain	Not Implemented	No comply. The information is not communicated in formatted electronic and the Issuer does not provide a unique identifier for each option. A new rule from the Regulator should be necessary	High level. Legal Barrier
Sweden	Not Implemented	Options are not given a specific identifier	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	In Progress		2010/11
United Kingdom	Implemented		

### Standard 20

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	No legal regulation - especially	In coordination with the members of

	- Legal Gap	communication between CSD and issuer	CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	ESES : optional ISO communication	To be implemented by SPCustody and mandatory
Denmark	Not Implemented		
Estonia	Implemented		
Finland	In Progress	CD participants communicate elections in form of proprietary electronic messages, other intermediary communication varies	
France	In Progress - Market less than 50% compliant	The current issuer CSD format is a proprietary format. This will be enhance with the implementation of SP Custody	Linked to SP Custody (ESES EUI) delivery
Germany	Implemented		Market practice.
Greece	In Progress	Only banks communicate the information to intermediaries using ISO standards	It seems difficult for all other market participants to use ISO standards due to the cost of such systems
Italy	Implemented		
Netherlands	Not Implemented		To be analysed by dedicated DuMIG subgroup. Interim analysis aimed at by 2009 Q4
Portugal	In Progress	Electronic communications are used but in a proprietary format	Not planned
Spain	Implemented		
Sweden	Not Implemented	Most instructions between intermediaries are sent electronically. Instructions to the issuer are not sent via the CSD and are not sent electronically.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 21

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	In Progress	Standard not always met	
Estonia	Implemented		
Finland	Implemented	Exchange of original holding to a technical security to represent elected underlying securities should be an accepted solution.	
France	Implemented		
Germany	Implemented	Separation by the (I)CSD and all Intermediaries via blocking by safe keeping parameter or on sub account	Market practice.
Greece	Implemented		
Italy	In Progress	Election is not booked but binding	
Netherlands	Not Implemented		To be analysed by dedicated DuMIG subgroup. Interim analysis aimed at by 2009 Q4
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented	The CSD can only act upon the instruction received from the issuer. The securities can be moved to a segregated account in the CSD for later processing. The intermediaries either block or move to a separate account.	
Switzerland	Not Implemented	Process to be discussed with the whole community (infrastructure, banks etc.)	
United Kingdom	Implemented		

### Standard 22a

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	In Progress	Equities market - payment outside settlement system Fixed income market - payment in settlement system	
France	In Progress - Market at least 50% compliant	The current market practice permits to choose between "Direct Payment" (fully compliant with standard 17(a)) and "Classical Payment" (not compliant with this standard). The current possibility to pay via "Classical Payment" process will disappear with SP Custody implementation. This will permit to meet the requirements of this standard.	SP Custody (ESES EUI)
Germany	Implemented		Market practice.
Greece	N/A		
Italy	Implemented	as from BICOMP (payment system) rules, payment instructions are irrevocable after 10:30 and cash settlement instructions are sent within 12:00	
Netherlands	Implemented		
Portugal	Implemented		
Spain	Not Implemented	Most of the payments are not made in Central Bank money since Art. 215 L.S.A. envisages the possibility of make the payment directly at the Issuer's Registered Address. Sometimes the Issuer makes payments through the (I)CSD.	High level. Legal Barrier
Sweden	Not Implemented	The payments are made in central bank money via the CSD for all participants holding their interest-bearing securities on PM accounts.	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 22b

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented		
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 22c

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Not Implemented	EBE: not OK - current recommended deadline is : 2/3 pm, NBB : N/A	To be discussed within the market (MEC Sept)
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	Implemented		
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented	as from BICOMP (payment system) rules, payment instructions are irrevocable after 10:30 and cash settlement instructions are sent within 12:00	
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented	Some payments are done after midday in order to avoid potential risks for the Agent Bank.	
Sweden	Not Implemented	Payments can be made until 2 pm, but most payments are made before 10 am	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	Implemented	Met for vast majority of events. Issuer agents will only distribute payments when in receipt of funds from the Issuer.	

### Standard 22d

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Implemented		
Denmark	Not Implemented	We agree but cannot always comply. If the payment is completed it cannot be reversed by the CSD (legal matter)	
Estonia	Implemented		
Finland	In Progress	Applicable in most cases.	
France	In Progress - Market less than 50% compliant	This case is marginal in France but may be applied through the CSD. The implementation target is to be seen as a milestone but not a dependance on the SP Custody delivery	SP Custody (ESES EUI)
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Not Implemented	MT does not reverse the whole payment, rather it makes adjustments in the paid amount	To be discussed with industry
Netherlands	Implemented		
Portugal	Implemented		
Spain	Not Implemented	No complete reversal of the Payment is done. The difference is credited or debited depending on the case.	High level
Sweden	In Progress	Cash: Issuers can only ask for a reversal - reversals rarely occur. Securities: It is possible for the CSD to reverse a payment of securities. However, if	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with

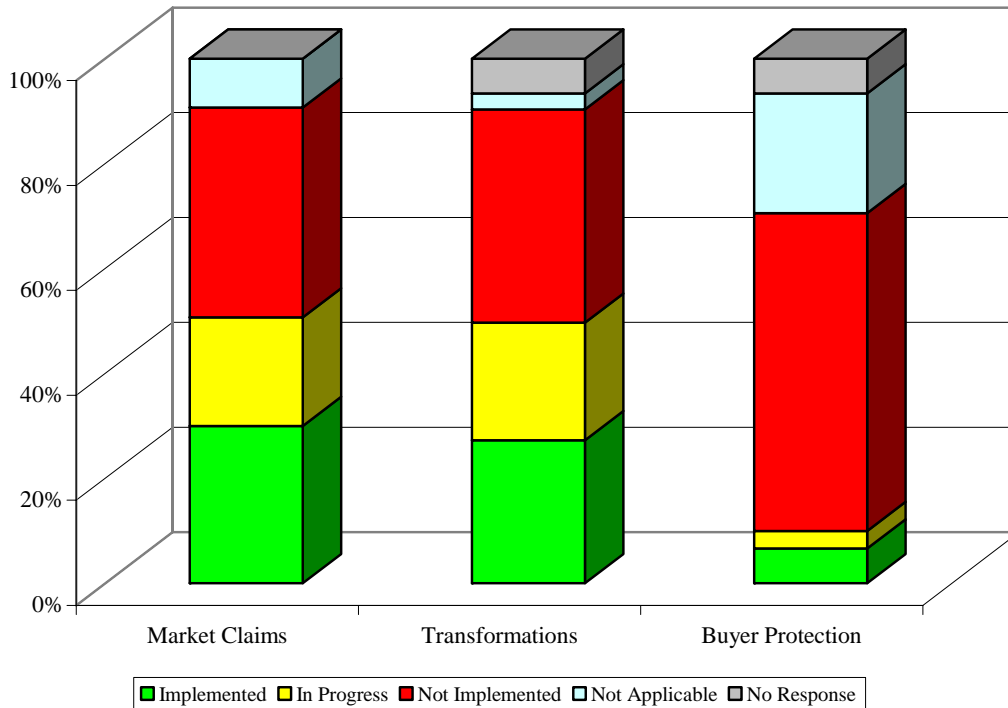
		settlement of trades have occurred in the securities it may be both desired and necessary to debet the actual holdings rather than the holdings as of pay date.	the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 23

Country	Market Status	Comments	Implementation Plan
Austria	Implemented		
Belgium	Not Implemented		To be discussed with the Issuers
Denmark	Implemented		
Estonia	Implemented		
Finland	Implemented		
France	In Progress	This is linked to Issuer's capacity to deal securities on "Pay Date". The availability of new securities is dependant on the green light per default process. When SP Custody will be implemented, the securities distribution should depend on a greenlight given by the Payment agent. The final process of this greenlight for this kind of distributions is to be finetuned. Due to current operationnal constaints and considering the current procedures, this greenlight could occur only on Pay Date. As a result, involved securities would not be available when the settlement system open but the day after. In such case, the 18(a) requirement would not be met.	Linked to SP Custody (EUI) delivery
Germany	Implemented		Market practice.
Greece	Implemented		
Italy	Implemented	except for Exchange Offer	
Netherlands	Implemented		
Portugal	Implemented		
Spain	Implemented		
Sweden	In Progress	Pay date is not always set as a specific date and can be rolling; if a pay date would be set the standard would be met.	This gap will be discussed in the Corporate Actions WG for migration to the Single Platform. If the market agrees to remove the gap, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Implemented		
United Kingdom	Implemented		

## 3.5 Transaction Management

### 3.5.1 Overall status



**Figure 11:** Overall status market standards on transaction management

The standards on market claims are implemented for 30%. The majority of standards is not yet implemented (40%) or still in progress (21%). The same applies to standards on Transformations: 27% are implemented, 22% are still in progress and 41% are not yet implemented.

The situation for the standards on Buyer Protection is the following: 61% is not yet implemented and 23% is not applicable since the described procedures do not exist so far in most countries in Europe.

In the following paragraphs you can see the detailed feedbacks received from the single countries with respect to Transaction Management.

### 3.5.2 Market Claims

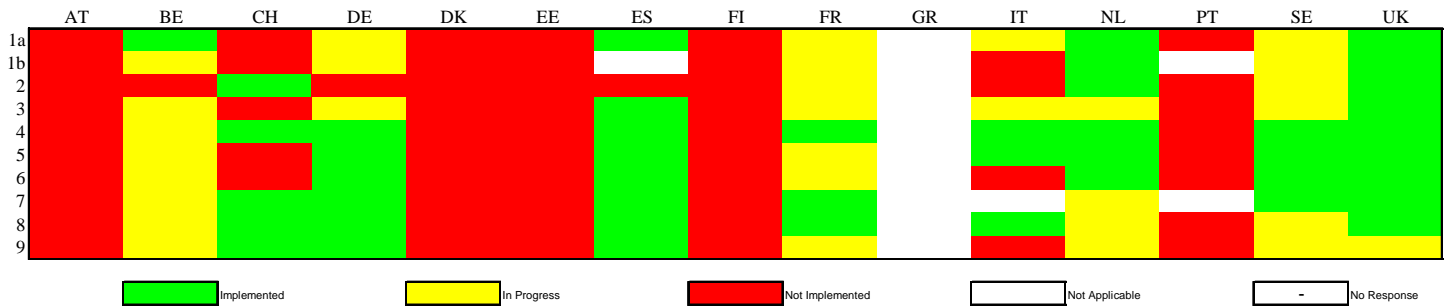


Figure 12: Overview Market Claims

#### Standard 1a

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date. What kind of transaction? E.g. SWIFT which kind of MT5XX?	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Implemented	EBE: OK, LCH Clnt: OK, NBB N/A	
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented	Estonian CSD is currently not offering the administration of market claims as the occurrence of these is marginal.	Plans to be set up by ECSD in cooperation with the market participants.
Finland	Not Implemented	no automatic market claims functionality	
France	In Progress - Market at least 80% compliant	CSD 100% OK CCP : partially managed by CCP. LCH does not manage Claim as a separate Transaction from the underlying transaction. LCH clearnet model is to be modified to permit a segregated transaction to manage the Claim	End 2011 beginning 2012 for the Market Claim separation
Germany	In Progress	For standard compensations we comply. Reverse compensations using Record Date have not yet been introduced.	Foreseen for Record Date implementation in 2010 if Issuers agree a voluntarily change of market practice. If Issuers do not agree, then legislation is required and an estimated implementation date cannot be provided at this time. Issuers believe that they will not receive 2/3 majorities at the AGM to change the company by-laws, because the investors will not accept a delay of the payment as well as the change of the actual German market practice. If the issuers could not receive majorities at the AGM to change the company bylaws they believes as well that they will not receive the simple



			majorities every year on the AGM for a "late payment" The Issuers prefer an EU directive which must be implemented into the German law and change the actual demand to pay out immediately after General Meeting
Greece	N/A	Transaction management, transformations & buyer protection processes are not applicable for the Greek equities market since current market practices do not allow recycling of pending transactions. These transactions are either canceled (and re-entered by the Participants or cash-compensated in the case of on exchange failed transactions)	Within 2010 recycling will be allowed and transaction management processes will be applied
Italy	In Progress	The Issuer CSD cancels the underlying transaction and replaces it with a new one re-issued, taking into account the economic and tax effect	There is an open discussion, linked to T2S implementation, regarding tax rules and mkt claims processing, in which the best solution at Italian mkt level appears to be Issuer CSD to define rules to be applied to mkt claims processing
Netherlands	Implemented		
Portugal	Not Implemented		Market claims for dividend payments are planned for the end of 2009
Spain	Implemented		
Sweden	Not Implemented	The CSD provides a list of claims for cash dividends, but offers no other support. The CCP, or the GCMs upon information from the CCP, will create market claims for at least their own instructions.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Not Implemented	There exists a fully automated process, but not the one described in the standards	
United Kingdom	Implemented		

### Standard 1b

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date. Market claim in Cash? Or in Securities? In which form? SWIFT?	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	EBE,LCH CInt : OK NBB: Not OK - no implementation of MC	NBB: implementation of T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	no automatic market claims functionality	
France	In Progress - Market at least 80% compliant	CSD 100% OK CCP : 100% OK provided the management of claim as a separate Transaction from the underlying transaction (please refer to 1(a))	
Germany	In Progress	For standard compensations we comply. Reverse compensations using Record Date have not yet been introduced.	Foreseen for Record Date implementation in 2010 if Issuers agree a voluntarily change of market practice. If

			Issuers do not agree, then legislation is required and an estimated implementation date cannot be provided at this time. Issuers believe that they will not receive 2/3 majorities at the AGM to change the company by-laws, because the investors will not accept a delay of the payment as well as the change of the actual German market practice. If the issuers could not receive majorities at the AGM to change the company bylaws they believe as well that they will not receive the simple majorities every year on the AGM for a "late payment" The Issuers prefer an EU directive which must be implemented into the German law
Greece	N/A	Transaction management, transformations & buyer protection processes are not applicable for the Greek equities market since current market practices do not allow recycling of pending transactions. These transactions are either canceled (and re-entered by the Participants or cash-compensated in the case of on exchange failed transactions)	Within 2010 recycling will be allowed and transaction management processes will be applied
Italy	Not Implemented	The Issuer CSD cancels the underlying transaction and replaces it with a new one rectified, taking into account the economic and tax effect	To be discussed with the industry
Netherlands	Implemented		
Portugal	N/A	Securities are not held in nominals at the CSD.	
Spain	N/A	Not applicable. Pending Transactions do not exist	
Sweden	In Progress	The CSD offers no support.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Not Implemented		
United Kingdom	Implemented		

## Standard 2

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	We believe that the standard 2 is an exception to standard 1. Therefore we don't see any benefit for harmonisation intentions.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	Not Implemented		EBE : implementation by SPTM, LCHCInt : to be determined NBB : implementation of T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	no automatic market claims functionality	
France	In Progress - Market less than 50% compliant	Currently, CSD and CCP cannot offer this possibility. Part of SPTM fonctionnality and the	Linked to SPTM Delivery

		availability is linked to the SPTM delivery.	
Germany	Not Implemented	Not currently available. Expected usage of TTCO/SPEX & SPCU flags to allow for exclusions from reverse claims as part of Record Date processing implementation.	Foreseen for 2010 as part of Record Date processing implementation, if Issuers agree voluntarily change of market practice. If Issuers do not agree, then legislation is required and an estimated implementation date cannot be provided at this time.
Greece	N/A	Transaction management, transformations & buyer protection processes are not applicable for the Greek equities market since current market practices do not allow recycling of pending transactions. These transactions are either canceled (and re-entered by the Participants or cash-compensated in the case of on exchange failed transactions)	Within 2010 recycling will be allowed and transaction management processes will be applied
Italy	Not Implemented	Due the above mentioned model , the new transaction is automatically defined as ex	To be implemented
Netherlands	Implemented		
Portugal	Not Implemented		Market claims for dividend payments are planned for the end of 2009
Spain	Not Implemented		High level
Sweden	In Progress	Cum/ex is a matching criterion if included for OTC transactions. The CSD participants take this into account.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 3

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	LCH Clnt : OK EBE: Not OK - ESES : 45 days NBB: Not OK	EBE : implementation of SPTM NBB : implementation of T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	no automatic market claims functionality	
France	In Progress - Market at least 80% compliant	CCP : 100% OK. CSD : partially OK. Currently Market Claims are possible on a period of 45 days for the whole ESES Aera. For the time being 20 days is non applicable. This change is to be coordinate with all players of the ESES aera in order to change the current 45 days rules. This will be connected with the implementation of SPTM	Linked to SPTM Delivery
Germany	In Progress	Clearstream currently processes standard compensations for 25 business days, starting at Ex Date. Record Date processing has not	Foreseen for 2010 as part of Record Date processing implementation (see general comment regarding RD implementation)

		been introduced in the German market; when implemented we expect to process for 20 days from Record Date +1.	
Greece	N/A	Transaction management, transformations & buyer protection processes are not applicable for the Greek equities market since current market practices do not allow recycling of pending transactions. These transactions are either canceled (and re-entered by the Participants or cash-compensated in the case of on exchange failed transactions)	Within 2010 recycling will be allowed and transaction management processes will be applied
Italy	In Progress	The Issuer CSD detects the market claim only at the record date	To be discussed with the industry
Netherlands	In Progress	Current ESES rules limit on 45 days, instead of 20	Will be realized with Single Platform implementation. Earlier realisation under consideration
Portugal	Not Implemented		Market claims for dividend payments are planned for the end of 2009
Spain	Implemented		
Sweden	In Progress	Not currently. The details of what the CCPs will offer in this regard is not yet determined.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Not Implemented	Created when underlying settles	
United Kingdom	Implemented		

#### Standard 4

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	EBE, LCH Clnt : OK NBB: Not OK	NBB : implementation of T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	no automatic market claims functionality	
France	Implemented	There could be exceptional cases for payment in non euro currencies	
Germany	Implemented		Market practice.
Greece	N/A	Transaction management, transformations & buyer protection processes are not applicable for the Greek equities market since current market practices do not allow recycling of pending transactions. These transactions are either canceled (and re-entered by the Participants or cash-compensated in the case of on exchange failed transactions)	Within 2010 recycling will be allowed and transaction management processes will be applied
Italy	Implemented		
Netherlands	Implemented		
Portugal	Not Implemented		Market claims for dividend payments are planned for the end of 2009
Spain	Implemented		
Sweden	Implemented		
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 5

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	EBE,LCH CInt : OK - TBC NBB: Not OK	NBB : implementation of T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	no automatic market claims functionality	
France	In Progress - Market at least 80% compliant	CSD : partially OK CCP : 100% OK The implementation is totally linked with the current "H2D" study. The implementation is connected with SP custody deliveries.	Linked to SP custody delivery.
Germany	Implemented		Market practice.
Greece	N/A	Transaction management, transformations & buyer protection processes are not applicable for the Greek equities market since current market practices do not allow recycling of pending transactions. These transactions are either canceled (and re-entered by the Participants or cash-compensated in the case of on exchange failed transactions)	Within 2010 recycling will be allowed and transaction management processes will be applied
Italy	Implemented		
Netherlands	Implemented		
Portugal	Not Implemented		Market claims for dividend payments are planned for the end of 2009
Spain	Implemented		
Sweden	Implemented	Currently, all market claims are created on or after payment date.	
Switzerland	Not Implemented	Settles together with underlying transaction	
United Kingdom	Implemented		

### Standard 6

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	What do you mean with "settlement of the market claim". What kind of SWIFT? Which kind of MT5XX?	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	EBE: In Progress - no "user friendly" tool LCHCInt:Not OK - Continuous trade netting NBB: Not OK	EBE:implementation of SPTM LCHCInt: business model must be changed NBB: implementation of T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	no automatic market claims functionality. Both linked and independent models should be allowed as clear view of the best solution seems not to exist.	

France	In Progress - Market at least 80% compliant	CCP : 100% OK. CSD : partially OK. Tool is not yet available on CSD side. "Hold and Release" functionality is not available on CSD level	Linked to SPTM Delivery
Germany	Implemented	At Clearstream, the creation of the market claim is dependent on the settlement of the underlying transaction. We would interpret the possibility offered by the Standard for a "user friendly implementation" by the CSD in such a manner that in future we will preserve the market practice/demand to link the market claim and the "underlying transaction" and thereby fulfil the standard.	Not foreseen.
Greece	N/A	Transaction management, transformations & buyer protection processes are not applicable for the Greek equities market since current market practices do not allow recycling of pending transactions. These transactions are either canceled (and re-entered by the Participants or cash-compensated in the case of on exchange failed transactions)	Within 2010 recycling will be allowed and transaction management processes will be applied
Italy	Not Implemented	The Issuer CSD cancels the underlying transaction and replaces it with a new one rectified, taking into account the economic and tax effect	To be discussed with the industry
Netherlands	Implemented		
Portugal	Not Implemented		Market claims for dividend payments are planned for the end of 2009
Spain	Implemented		
Sweden	Implemented	Hold & release functionality exists for this.	
Switzerland	Not Implemented	Settles together with underlying transaction	
United Kingdom	Implemented		

### Standard 7

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	Is the withholding rate related to withholding tax?	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress		NBB : implementation T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	no automatic market claims functionality	
France	Implemented	Exceptionnal cases on non Issuer (I)CSD may exist.	
Germany	Implemented		Market practice.
Greece	N/A	Transaction management, transformations & buyer protection processes are not applicable for the Greek equities market since current market practices do not allow recycling of pending transactions. These transactions are either canceled (and re-entered by the Participants or cash-compensated in the case of on exchange failed transactions)	Within 2010 recycling will be allowed and transaction management processes will be applied

Italy	N/A		According to Italian law, withholding agent is the entity who is closer to the final investor (as a consequence issuer model is not applicable)
Netherlands	In Progress		Being analysed
Portugal	N/A	CSD is not involved in tax withholding.	
Spain	Implemented		
Sweden	Implemented	The CSD distributes gross to all custodians. All cash market claims are paid gross - the respective withholding agent will debet the tax.	
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 8

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress		NBB : implementation T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a tranactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	no automatic market claims functionality	
France	Implemented		
Germany	Implemented		Market practice.
Greece	N/A	Transaction management, transformations & buyer protection processes are not applicable for the Greek equities market since current market practices do not allow recycling of pending transactions. These transactions are either canceled (and re-entered by the Participants or cash-compensated in the case of on exchange failed transactions)	Within 2010 recycling will be allowed and transaction management processes will be applied
Italy	Implemented		
Netherlands	In Progress		Being analysed
Portugal	Not Implemented		Market claims for dividend payments are planned for the end of 2009
Spain	Implemented		
Sweden	In Progress	Not reported by the CSD. CCPs does not report as market claims. Intermediaries report, upon settlement only, according to the standard.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Implemented	Reported at time of settlement	
United Kingdom	Implemented		

### Standard 9

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	EBE: Implemented LCHCInt: In Progress- ISO messaging to be adapted	NBB: implementation of T2S



		NBB: Not OK	
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	no automatic market claims functionality	
France	In Progress - Market at least 50% compliant	CCP is using a proprietary format and CSD is using MT564 to manage market claims. For CSD, change will be linked to the implementation of ISO 20022 standards in the scope of SPTM	Linked to SPTM Delivery
Germany	Implemented		Market practice.
Greece	N/A	Transaction management, transformations & buyer protection processes are not applicable for the Greek equities market since current market practices do not allow recycling of pending transactions. These transactions are either canceled (and re-entered by the Participants or cash-compensated in the case of on exchange failed transactions)	Within 2010 recycling will be allowed and transaction management processes will be applied
Italy	Not Implemented		To be discussed with the industry
Netherlands	In Progress		Being analysed
Portugal	Not Implemented		Market claims for dividend payments are planned for the end of 2009
Spain	Implemented		
Sweden	In Progress	The CSD is not compliant. The CCPs are not compliant. The intermediaries are compliant.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Implemented		
United Kingdom	In Progress	Introduced alongside implementation of the Euroclear Single Platform Custody development	Q4 2010



### 3.5.3 Transformations



Figure 13: Overview Transformations

#### Standard 1

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date. The Market Standards for Buyer Protections have to be implemented	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	EBE: In Progress - no transformation based on Buyer Protection LCHCInt: OK NBB: Not OK	NBB: implementation of T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Implemented		
Finland	Not Implemented		
France	Implemented		
Germany	In Progress	Transformations are processed on Entitlement Date (Record Date not yet introduced). Buyer protection not applicable in the German market.	Foreseen for 2010 as part of Record Date processing implementation (see general comment regarding RD implementation). Buyer protection not foreseen.
Greece	-	-	-
Italy	Implemented	Not applicable for voluntary reorganization, because buyer protection is not implemented	
Netherlands	Not Implemented	In NL, there is no institutionalised Buyer Protection service	
Portugal	Not Implemented		Not planned
Spain	Implemented		
Sweden	In Progress	No CSD support exist for transformations. The CCP, or the GCMs upon information from the CCP, will transform at least their own instructions. Intermediaries do not transform.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Not Implemented		
United Kingdom	Implemented	Note that where there is an 'Effective date' for an event, that date will be treated as trigger for transformation	

## Standard 2

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	EBE, LCHCInt: OK NBB: Not OK	NBB: implementation of T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Implemented		
Finland	In Progress	limited functionality in processing of certain Splits and conversions for automatic transformations	
France	In Progress - Market at least 80% compliant	CCP 100% CSD partially OK CSD may face very specific complex cases that still marginal. Trigger cancellation only will be managed in SPTM 2011.	Linked to SPTM Delivery
Germany	Not Implemented	Clearstream does not cancel; Clearstream modifies the existing trade with the same trade reference.	Not yet planned.
Greece	-	-	-
Italy	Implemented		
Netherlands	Implemented		
Portugal	Not Implemented		Not planned
Spain	Not Implemented	Original Transactions are not replaced. They are modified according to the terms of the Transformation	High level
Sweden	In Progress	The CSD is not compliant. The CCPs are compliant, at least for their own instructions.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Implemented	Transformations exist, but they take place on Ex Date	
United Kingdom	Implemented	Note that where there is an 'Effective date' for an event, that date will be treated as trigger for transformation	

## Standard 3

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress		Implementation of T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented	May be offered by the Market Participants.	
Finland	Not Implemented	very limited transformation currently implemented	

France	In Progress - Market less than 50% compliant	ESES does not offer this functionality and SP Custody will not be able to manage OPT OUT notion.	T2S
Germany	Not Implemented	Currently under analysis.	Not yet planned.
Greece	-	-	-
Italy	Not Implemented	The Issuer CSD doesn't provided opt-out facility	
Netherlands	Not Implemented		A change request is pending with SWIFT. Possibly realised in new release 2010.
Portugal	Not Implemented		Not planned
Spain	N/A		
Sweden	In Progress	N/A for the CSD. The CCPs are compliant.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Not Implemented		
United Kingdom	Implemented		

#### Standard 4

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	EBE: In Progress - no transformation when Voluntary Reorg. LCHCInt: OK NBB: Not OK	NBB: implementation of T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Implemented		
Finland	Not Implemented	very limited transformation currently implemented	
France	Implemented		
Germany	In Progress	Transformations are processed on Entitlement Date (Record Date not yet introduced).	Foreseen for 2010 as part of Record Date processing implementation (see general comment regarding RD implementation) Buyer protection not foreseen.
Greece	-	-	-
Italy	Not Implemented	Issuer CSD performs transformation at the record date only	
Netherlands	Implemented		
Portugal	Not Implemented		Not planned
Spain	Not Implemented	No comply. Transformations are done in D+2, once breakdowns have been received.	High level
Sweden	In Progress	The CSD is not compliant. The CCPs are compliant, at least for their own instructions.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Implemented		
United Kingdom	Implemented	Note that where there is an 'Effective date' for an event, that date will be treated as trigger for transformation	

### Standard 5

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented - Legal Gap	The CANIG Austria is in discussion with legal experts to get legal proposals for implementation in the Austrian law. In Austria there is a need for a legal implementation of the record date.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress		NBB : implementation T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Implemented		
Finland	Not Implemented		
France	Implemented		
Germany	Not Implemented	Instruction of the old ISIN is not allowed, as of Ex Date.	Not foreseen.
Greece	-	-	-
Italy	In Progress	Garanteed participation date is non applicable	To be discussed with the industry
Netherlands	Not Implemented		Being analysed
Portugal	Not Implemented		Not planned
Spain	Not Implemented	No comply. The old ISIN exists two days after RD.	High level
Sweden	Not Implemented	ISINs are currently not changed after all reorganisations (split, reverse split)	For change of ISIN, please see std 16 of Mandatory Reorganisations. For the rest, this gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Not Implemented		
United Kingdom	Implemented		

### Standard 6

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress		NBB : implementation T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Implemented		
Finland	Not Implemented	very limited transformation currently implemented	
France	Implemented		
Germany	Implemented		Market practice.
Greece	-	-	-
Italy	Implemented		
Netherlands	Implemented		
Portugal	Not Implemented		Not planned
Spain	Implemented		
Sweden	In Progress	N/A for the CSD. The CCPs are compliant, at least for their own instructions.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).

Switzerland	Implemented		
United Kingdom	In Progress	Introduced alongside implementation of the Euroclear Single Platform Custody development	Q4 2010

### Standard 7

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress		NBB : implementation T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Implemented		
Finland	Not Implemented	very limited transformation currently implemented	
France	Implemented		
Germany	Implemented		Market practice.
Greece	-	-	-
Italy	Implemented		
Netherlands	Implemented		
Portugal	Not Implemented		Not planned
Spain	Implemented		
Sweden	In Progress	N/A for the CSD. The CCPs are compliant, at least for their own instructions.	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Not Implemented		
United Kingdom	Implemented		

### Standard 8

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress –	EBE: OK LCHCInt: In Progress - to adapt business model NBB: Not OK	NBB: implementation T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	very limited transformation currently implemented	
France	In Progress - Market at least 50% compliant	CSD is operating a net amount (and not two cash transactions). The implementation is connected with the delivery of SPTM CCP is OK for this standard	Linked to SPTM Delivery
Germany	N/A	in analogy to Securities Distribution Nr. 16 b,c we would evaluate 8 und 9 in the same manner.	

Greece	-	-	-
Italy	In Progress	Issuer CSD creates only one cash transaction for the global amount to be settled but two different cash transactions can be created	To be implemented
Netherlands	Implemented		
Portugal	Not Implemented		Not planned
Spain	N/A		
Sweden	In Progress	N/A for the CSD. We do not yet know if this will be applicable to CCPs. Intermediaries currently perform this (manually and outside the CSD system).	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Not Implemented		
United Kingdom	Implemented		

### Standard 9

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress		NBB : implementation T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	very limited transformation currently implemented	
France	In Progress - Market at least 50% compliant	On CSD side this is partially ok when bottom up processus is needed. CCP is OK with this standard.	Linked to SPTM Delivery
Germany	N/A	There is no CINL cash compensation in the German Market. In general fractions of securities are distributed. For processing of the transformations the German market create "Teilrechte" (partial rights). All "Teilrechte" which could not use for feeding into a new share will transfer from the (I)CSD to the agent / lead manager and the agent / lead manager will execute and commercialize the "Teilrechte" and pay directly the cash amount to the depository bank.	Not applicable. Equivalent market practice to get the standard. No change of current market practice foreseen.
Greece	-	-	-
Italy	Not Implemented	Issuer CSD doesn't create an additional cash transactions as required in a) point	To be discussed with the industry
Netherlands	In Progress	Not the Issuer, but the Intermediary does pay the compensation	Under consideration that the method to be applied will be included in the Announcement; actual amounts will be known at a later stage only. Progress possibly by 2009 Q4
Portugal	Not Implemented		Not planned
Spain	N/A		
Sweden	In Progress	a) This is done, but not by the CSD b) We do not yet know what the CCPs will do	a) This gap will be removed with the implementation of the Single Platform in Sweden (2012). b) As yet unknown.
Switzerland	Not Implemented		
United Kingdom	In Progress	Introduced alongside implementation of the	Q4 2010

		Euroclear Single Platform Custody development	
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### Standard 10

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress		NBB : implementation T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Implemented		
Finland	Not Implemented	very limited transformation currently implemented	
France	Implemented		
Germany	Implemented		Market practice.
Greece	-	-	-
Italy	Not Implemented	No reports are provided by Issuer CSD or CCP	To be discussed with the industry
Netherlands	In Progress		Being analysed
Portugal	Not Implemented		Not planned
Spain	Implemented		
Sweden	In Progress		This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Implemented		
United Kingdom	Implemented		

### Standard 11

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress	EBE: In Progress - optional ISO communication LCHCInt: In Progress - ISO messaging to be adapted NBB: Not OK	EBE: To be implemented by SPCustody and mandatory NBB: implementation T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Implemented		
Finland	Not Implemented	very limited transformation currently implemented	
France	In Progress - Market at least 50% compliant	Proprietary messages are used by CSD	Linked to SPTM Delivery
Germany	Implemented		Market practice.
Greece	-	-	-
Italy	Not Implemented	No reports are provided by Issuer CSD or CCP	To be discussed with the industry

Netherlands	In Progress		Being analysed
Portugal	Not Implemented		Not planned
Spain	Implemented		
Sweden	In Progress	N/A as answer to 10 is no	This gap will be removed with the implementation of the Single Platform in Sweden (2012).
Switzerland	Implemented		
United Kingdom	In Progress	Introduced alongside implementation of the Euroclear Single Platform Custody development	Q4 2010



### 3.5.4 Buyer Protections

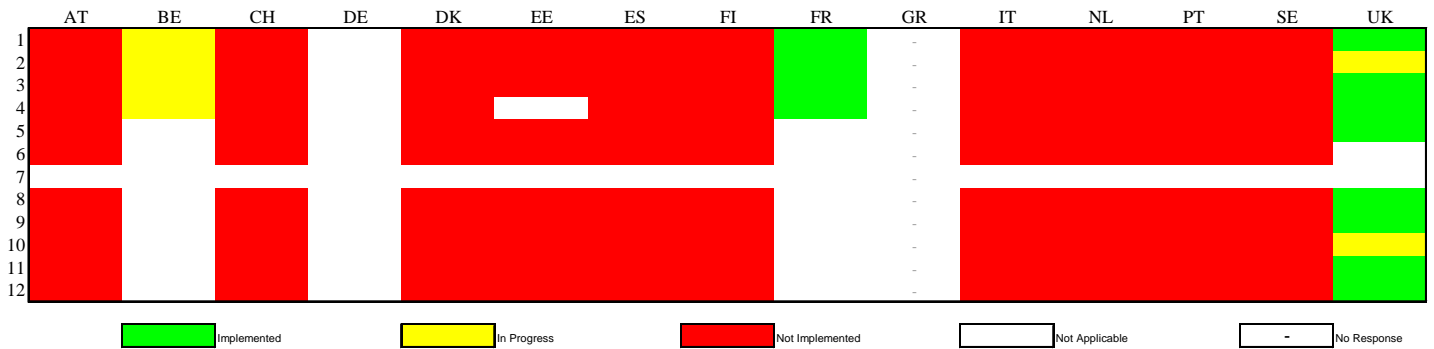


Figure 14: Overview Buyer Protection

#### Standard 1

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress		To be discussed with the market NBB : implementation of T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented	The service is currently not offered by the Estonian CSD.	Plans to be set up by ECSD in cooperation with the market participants.
Finland	Not Implemented	As no buyer protection is currently implemented in the Finnish market, no clear view of the importance and the desirability of such functionality exists. It was discussed however that functionality seems useful, but requires more investigation to evaluate possible benefits and efforts required to implement / process	
France	Implemented	In essence a mechanism of Buyer Protection is currently available and compliant with the standard general notes concerning BP (page 45 of the standards).	
Germany	N/A	Buyer protection not applicable in the German market. The German market has efficient procedures which are not called buyer protection but have the same protection and outcome.	Not applicable.
Greece	-	-	-
Italy	Not Implemented		To be discussed with the industry
Netherlands	Not Implemented	In NL, there is no institutionalised Buyer Protection service	Market in NL will (re)formulate view on buyer protection (2009 Q3). Further analysis will follow thereafter.
Portugal	Not Implemented		Not planned
Spain	Not Implemented		
Sweden	Not Implemented	No buyer protection currently exist in the market, except for that offered by CCPs or maually agreed between certain non-domestic	A possible implementation of buyer protection will be discussed in the WGs for migration to the Single Platform. If

		counterparties. No CSD functionality exists for BP.	the market agrees to implement BP, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Not Implemented		
United Kingdom	Implemented		

### Standard 2

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	A Buyer Protection Order must be clearly marked as such by the buyer.	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress		To be discussed with the market NBB : implementation of T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	As no buyer protection is currently implemented in the Finnish market, no clear view of the importance and the desirability of such functionality exists. It was discussed however that functionality seems useful, but requires more investigation to evaluate possible benefits and efforts required to implement / process	
France	Implemented	In essence a mechanism of Buyer Protection is currently available and compliant with the standard general notes concerning BP (page 45 of the standards).	
Germany	N/A	Buyer protection not applicable in the German market. The German market has efficient procedures which are not called buyer protection but have the same protection and outcome.	Not applicable.
Greece	-	-	-
Italy	Not Implemented		To be discussed with the industry
Netherlands	Not Implemented	In NL, there is no institutionalised Buyer Protection service	Market in NL will (re)formulate view on buyer protection (2009 Q3). Further analysis will follow thereafter.
Portugal	Not Implemented		Not planned
Spain	Not Implemented		
Sweden	Not Implemented	No buyer protection currently exist in the market, except for that offered by CCPs or manually agreed between certain non-domestic counterparties. No CSD functionality exists for BP.	A possible implementation of buyer protection will be discussed in the WGs for migration to the Single Platform. If the market agrees to implement BP, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Not Implemented		
United Kingdom	In Progress	Introduced alongside implementation of the Euroclear Single Platform Custody development	Q4 2010

### Standard 3

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 -

			10/09.
Belgium	In Progress		To be discussed with the market NBB : implementation of T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	As no buyer protection is currently implemented in the Finnish market, no clear view of the importance and the desirability of such functionality exists. It was discussed however that functionality seems useful, but requires more investigation to evaluate possible benefits and efforts required to implement / process	
France	Implemented	In essence a mechanism of Buyer Protection is currently available and compliant with the standard general notes concerning BP (page 45 of the standards).	
Germany	N/A	Buyer protection not applicable in the German market. The German market has efficient procedures which are not called buyer protection but have the same protection and outcome.	Not applicable.
Greece	-	-	-
Italy	Not Implemented		To be discussed with the industry
Netherlands	Not Implemented	In NL, there is no institutionalised Buyer Protection service	Market in NL will (re)formulate view on buyer protection (2009 Q3). Further analysis will follow thereafter.
Portugal	Not Implemented		Not planned
Spain	Not Implemented		
Sweden	Not Implemented	No buyer protection currently exist in the market, except for that offered by CCPs or manually agreed between certain non-domestic counterparties. No CSD functionality exists for BP.	A possible implementation of buyer protection will be discussed in the WGs for migration to the Single Platform. If the market agrees to implement BP, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Not Implemented		
United Kingdom	Not Implemented	Question this standard - requires clarification and appears to have a detrimental affect on processing efficiency. To be queried to the Corporate Actions Joint Working Group.	

#### Standard 4

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	In Progress		To be discussed with the market NBB : implementation of T2S
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	

Estonia	-	-	-
Finland	Not Implemented	As no buyer protection is currently implemented in the Finnish market, no clear view of the importance and the desirability of such functionality exists. It was discussed however that functionality seems useful, but requires more investigation to evaluate possible benefits and efforts required to implement / process	
France	Implemented	In essence a mechanism of Buyer Protection is currently available and compliant with the standard general notes concerning BP (page 45 of the standards).	
Germany	N/A	Buyer protection not applicable in the German market. The German market has efficient procedures which are not called buyer protection but have the same protection and outcome.	Not applicable.
Greece	-	-	-
Italy	Not Implemented		To be discussed with the industry
Netherlands	Not Implemented	In NL, there is no institutionalised Buyer Protection service	Market in NL will (re)formulate view on buyer protection (2009 Q3). Further analysis will follow thereafter.
Portugal	Not Implemented		Not planned
Spain	Not Implemented		
Sweden	Not Implemented	No buyer protection currently exist in the market, except for that offered by CCPs or manually agreed between certain non-domestic counterparties. No CSD functionality exists for BP.	A possible implementation of buyer protection will be discussed in the WGs for migration to the Single Platform. If the market agrees to implement BP, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Not Implemented		
United Kingdom	Implemented		

### Standard 5

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	N/A		
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	As no buyer protection is currently implemented in the Finnish market, no clear view of the importance and the desirability of such functionality exists. It was discussed however that functionality seems useful, but requires more investigation to evaluate possible benefits and efforts required to implement / process	
France	N/A	As the French Market is compliant with Standard 1 to 4 in essence, this item is not applicable.	
Germany	N/A	Buyer protection not applicable in the	Not applicable.

		German market. The German market has efficient procedures which are not called buyer protection but have the same protection and outcome.	
Greece	-	-	-
Italy	Not Implemented		To be discussed with the industry
Netherlands	Not Implemented	In NL, there is no institutionalised Buyer Protection service	Market in NL will (re)formulate view on buyer protection (2009 Q3). Further analysis will follow thereafter.
Portugal	Not Implemented		Not planned
Spain	Not Implemented		
Sweden	Not Implemented	No buyer protection currently exist in the market, except for that offered by CCPs or maually agreed between certain non-domestic counterparties. No CSD functionality exists for BP.	A possible implementation of buyer protection will be discussed in the WGs for migration to the Single Platform. If the market agrees to implement BP, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Not Implemented		
United Kingdom	Implemented		

### Standard 6

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	N/A		
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a tranactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	As no buyer protection is currently implemented in the Finnish market, no clear view of the importance and the desirability of such functionality exists. It was discussed however that functionality seems useful, but requires more investigation to evaluate possible benefits and efforts required to implement / process	
France	N/A	As the French Market is compliant with Standard 1 to 4 in essence, this item is not applicable.	
Germany	N/A	Buyer protection not applicable in the German market. The German market has efficient procedures which are not called buyer protection but have the same protection and outcome.	Not applicable.
Greece	-	-	-
Italy	Not Implemented		To be discussed with the industry
Netherlands	Not Implemented	In NL, there is no institutionalised Buyer Protection service	Market in NL will (re)formulate view on buyer protection (2009 Q3). Further analysis will follow thereafter.
Portugal	Not Implemented		Not planned
Spain	Not Implemented		
Sweden	Not Implemented	No buyer protection currently exist in the market, except for that offered by CCPs or maually agreed between certain non-domestic	A possible implementation of buyer protection will be discussed in the WGs for migration to the Single Platform. If

		counterparties. No CSD functionality exists for BP.	the market agrees to implement BP, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Not Implemented		
United Kingdom	N/A		

### Standard 7

Country	Market Status	Comments	Implementation Plan
Austria	N/A	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	N/A		
Denmark	N/A	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	N/A		
Finland	N/A	As no buyer protection is currently implemented in the Finnish market, no clear view of the importance and the desirability of such functionality exists. It was discussed however that functionality seems useful, but requires more investigation to evaluate possible benefits and efforts required to implement / process	
France	N/A	As the French Market is compliant with Standard 1 to 4 in essence, this item is not applicable.	
Germany	N/A	Buyer protection not applicable in the German market. The German market has efficient procedures which are not called buyer protection but have the same protection and outcome.	Not applicable.
Greece	N/A	-	-
Italy	N/A		To be discussed with the industry
Netherlands	N/A	In NL, there is no institutionalised Buyer Protection service	Market in NL will (re)formulate view on buyer protection (2009 Q3). Further analysis will follow thereafter.
Portugal	N/A		Not planned
Spain	N/A		
Sweden	N/A	No buyer protection currently exist in the market, except for that offered by CCPs or mauually agreed between certain non-domestic counterparties. No CSD functionality exists for BP.	A possible implementation of buyer protection will be discussed in the WGs for migration to the Single Platform. If the market agrees to implement BP, it will be done with the implementation of Single Platform in Sweden.
Switzerland	N/A		
United Kingdom	N/A	Impossible to determine whether or not the UK is compliant without knowing what other CSDs are doing. ECSDA to take forward. Not within remit of the UKMIG.	

### Standard 8

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.

Belgium	N/A		
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	As no buyer protection is currently implemented in the Finnish market, no clear view of the importance and the desirability of such functionality exists. It was discussed however that functionality seems useful, but requires more investigation to evaluate possible benefits and efforts required to implement / process	
France	N/A	As the French Market is compliant with Standard 1 to 4 in essence, this item is not applicable.	
Germany	N/A	Buyer protection not applicable in the German market. The German market has efficient procedures which are not called buyer protection but have the same protection and outcome.	Not applicable.
Greece	-	-	-
Italy	Not Implemented		To be discussed with the industry
Netherlands	Not Implemented	In NL, there is no institutionalised Buyer Protection service	Market in NL will (re)formulate view on buyer protection (2009 Q3). Further analysis will follow thereafter.
Portugal	Not Implemented		Not planned
Spain	Not Implemented		
Sweden	Not Implemented	No buyer protection currently exist in the market, except for that offered by CCPs or manually agreed between certain non-domestic counterparties. No CSD functionality exists for BP.	A possible implementation of buyer protection will be discussed in the WGs for migration to the Single Platform. If the market agrees to implement BP, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Not Implemented		
United Kingdom	Implemented		

### Standard 9

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	N/A		
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	As no buyer protection is currently implemented in the Finnish market, no clear view of the importance and the desirability of such functionality exists. It was discussed however that functionality seems useful, but requires more investigation to evaluate	



		possible benefits and efforts required to implement / process	
France	N/A	As the French Market is compliant with Standard 1 to 4 in essence, this item is not applicable.	
Germany	N/A	Buyer protection not applicable in the German market. The German market has efficient procedures which are not called buyer protection but have the same protection and outcome.	Not applicable.
Greece	-	-	-
Italy	Not Implemented		To be discussed with the industry
Netherlands	Not Implemented	In NL, there is no institutionalised Buyer Protection service	Market in NL will (re)formulate view on buyer protection (2009 Q3). Further analysis will follow thereafter.
Portugal	Not Implemented		Not planned
Spain	Not Implemented		
Sweden	Not Implemented	No buyer protection currently exist in the market, except for that offered by CCPs or manually agreed between certain non-domestic counterparties. No CSD functionality exists for BP.	A possible implementation of buyer protection will be discussed in the WGs for migration to the Single Platform. If the market agrees to implement BP, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Not Implemented		
United Kingdom	Implemented		

### Standard 10

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	N/A		
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	As no buyer protection is currently implemented in the Finnish market, no clear view of the importance and the desirability of such functionality exists. It was discussed however that functionality seems useful, but requires more investigation to evaluate possible benefits and efforts required to implement / process	
France	N/A	As the French Market is compliant with Standard 1 to 4 in essence, this item is not applicable.	
Germany	N/A	Buyer protection not applicable in the German market. The German market has efficient procedures which are not called buyer protection but have the same protection and outcome.	Not applicable.
Greece	-	-	-
Italy	Not Implemented		To be discussed with the industry
Netherlands	Not Implemented	In NL, there is no institutionalised Buyer Protection service	Market in NL will (re)formulate view on buyer protection (2009 Q3). Further



			analysis will follow thereafter.
Portugal	Not Implemented		Not planned
Spain	Not Implemented		
Sweden	Not Implemented	No buyer protection currently exist in the market, except for that offered by CCPs or mauually agreed between certain non-domestic counterparties. No CSD functionality exists for BP.	A possible implementation of buyer protection will be discussed in the WGs for migration to the Single Platform. If the market agrees to implement BP, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Not Implemented		
United Kingdom	In Progress	Introduced alongside implementation of the Euroclear Single Platform Custody development	Q4 2010

### Standard 11

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	N/A		
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a tranactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	As no buyer protection is currently implemented in the Finnish market, no clear view of the importance and the desirability of such functionality exists. It was discussed however that functionality seems useful, but requires more investigation to evaluate possible benefits and efforts required to implement / process	
France	N/A	As the French Market is compliant with Standard 1 to 4 in essence, this item is not applicable.	
Germany	N/A	Buyer protection not applicable in the German market. The German market has efficient procedures which are not called buyer protection but have the same protection and outcome.	Not applicable.
Greece	-	-	-
Italy	Not Implemented		To be discussed with the industry
Netherlands	Not Implemented	In NL, there is no institutionalised Buyer Protection service	Market in NL will (re)formulate view on buyer protection (2009 Q3). Further analysis will follow thereafter.
Portugal	Not Implemented		Not planned
Spain	Not Implemented		
Sweden	Not Implemented	No buyer protection currently exist in the market, except for that offered by CCPs or mauually agreed between certain non-domestic counterparties. No CSD functionality exists for BP.	A possible implementation of buyer protection will be discussed in the WGs for migration to the Single Platform. If the market agrees to implement BP, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Not Implemented		
United Kingdom	Implemented	Note that where there is an 'Effective date' for a mandatory with options event, that date will	

		be treated as trigger for transformation	
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## Standard 12

Country	Market Status	Comments	Implementation Plan
Austria	Not Implemented	In Review	In coordination with the members of CANIG Austria. Meeting in 09/09 - 10/09.
Belgium	N/A		
Denmark	Not Implemented	Transaction management is today not handled at the Danish CSD. Eg. market claims is handled in the market between the participants. The design and build of a transactions management system in the Danish CSD is currently being investigated.	
Estonia	Not Implemented		
Finland	Not Implemented	As no buyer protection is currently implemented in the Finnish market, no clear view of the importance and the desirability of such functionality exists. It was discussed however that functionality seems useful, but requires more investigation to evaluate possible benefits and efforts required to implement / process	
France	N/A	As the French Market is compliant with Standard 1 to 4 in essence, this item is not applicable.	
Germany	N/A	Buyer protection not applicable in the German market. The German market has efficient procedures which are not called buyer protection but have the same protection and outcome.	Not applicable.
Greece	-	-	-
Italy	Not Implemented		To be discussed with the industry
Netherlands	Not Implemented	In NL, there is no institutionalised Buyer Protection service	Market in NL will (re)formulate view on buyer protection (2009 Q3). Further analysis will follow thereafter.
Portugal	Not Implemented		Not planned
Spain	Not Implemented		
Sweden	Not Implemented	No buyer protection currently exist in the market, except for that offered by CCPs or manually agreed between certain non-domestic counterparties. No CSD functionality exists for BP.	A possible implementation of buyer protection will be discussed in the WGs for migration to the Single Platform. If the market agrees to implement BP, it will be done with the implementation of Single Platform in Sweden.
Switzerland	Not Implemented		
United Kingdom	Implemented		

## 4. Bibliography

- European Central Bank (2008), Financial Integration in Europe, p. 6, <http://www.ecb.int/pub/pdf/other/financialintegrationineurope200804en.pdf>
- European Central Bank, TARGET2-Securities, <http://www.ecb.de/paym/t2s/about/why/html/index.en.html>
- European Commission (2009), European Financial Integration Report 2008, p. 7, [http://ec.europa.eu/internal\\_market/finances/docs/cross-sector/fin-integration/efir\\_report\\_2008\\_en.pdf](http://ec.europa.eu/internal_market/finances/docs/cross-sector/fin-integration/efir_report_2008_en.pdf)
- European System of Central Banks / Committee of European Securities Regulators (2009), Recommendations for securities settlement systems and recommendations for central counterparties in the European Union, [http://www.ecb.int/pub/pdf/other/pr090623\\_escb-cesr\\_recommendationsen.pdf?91abb7e93d7a50dcb2acf3c7bfe629f1](http://www.ecb.int/pub/pdf/other/pr090623_escb-cesr_recommendationsen.pdf?91abb7e93d7a50dcb2acf3c7bfe629f1)
- Federation of European Securities Exchanges / European Association of Central Counterparty Clearing Houses / European Central Securities Depositories Association (2006), European Code of Conduct for Clearing and Settlement, [http://www.fese.be/lib/files/European\\_Code\\_of\\_Conduct\\_for\\_Clearing\\_and\\_Settlement.pdf](http://www.fese.be/lib/files/European_Code_of_Conduct_for_Clearing_and_Settlement.pdf)
- Giovannini Group, The (2001), Cross-Border clearing and settlement arrangements in the European Union, p. ii, [http://ec.europa.eu/internal\\_market/financial-markets/docs/clearing/first\\_giovannini\\_report\\_en.pdf](http://ec.europa.eu/internal_market/financial-markets/docs/clearing/first_giovannini_report_en.pdf)
- Giovannini Group, The (2003), Second Report on EU Clearing and Settlement Arrangements”, p. i – ii, [http://ec.europa.eu/internal\\_market/financial-markets/docs/clearing/second\\_giovannini\\_report\\_en.pdf](http://ec.europa.eu/internal_market/financial-markets/docs/clearing/second_giovannini_report_en.pdf)
- Markets in Financial Instruments Directive (MiFID), 2004/39/EC, [http://eur-lex.europa.eu/LexUriServ/site/en/com/2005/com2005\\_0253en01.pdf](http://eur-lex.europa.eu/LexUriServ/site/en/com/2005/com2005_0253en01.pdf)

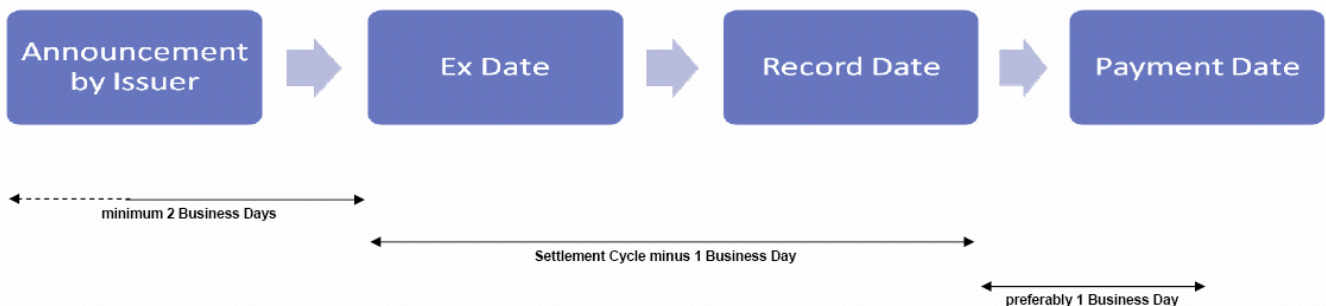
## Annex 1: The Market Standards on Corporate Actions Processing

### MARKET STANDARDS FOR CORPORATE ACTIONS PROCESSING

#### *DISTRIBUTIONS*

##### Cash Distributions

##### - Sequence of Dates



Note that the Ex Date is not applicable to securities in nominal, e.g. bonds

##### - Market Standards

###### *Information from Issuer to Issuer (I)CSD*

1. The Issuer should inform its Issuer (I)CSD of the details of a Cash Distribution, including the key dates, as soon as the Issuer has publicly announced the Corporate Action according to applicable law. It should also inform the Issuer (I)CSD of any change or confirmation of the Corporate Action.
2. For floating rate instruments, the Payment Date confirmation and the announcement of the next applicable rate with reference to the applicable period for that new rate should be made in two separate announcements and not combined in the same.
3. The information should be communicated in formatted electronic form using standards defined and used by the securities industry, such as the ISO standards, irrespective of the communication channel used.
4. For narrative text in the information, Issuers with an international shareholder base should use at least a language customary in the sphere of international finance, currently English.

###### *Information from Issuer (I)CSD to its participants*

5. The Issuer (I)CSD should communicate the information, and any subsequent information, without undue delay of receipt from the Issuer, to all its participants<sup>11</sup> who, at the time of the announcement, have a direct holding or Pending Transaction in the Underlying Security with the Issuer (I)CSD.

<sup>11</sup> Including Investor (I)CSDs

6. The Issuer (I)CSD should also inform, without undue delay, any participant who obtains a holding or is subject to a new Transaction on the Underlying Security after the announcement until the Record Date.
7. The information should be communicated in formatted electronic form using standards defined and used by the securities industry, such as the ISO standards, irrespective of the communication channel used.
8. If a Payment needs to be reversed, an announcement, including the reason for such reversal, should be made by the Issuer (I)CSD to all affected parties prior to processing the reversal.

*Information flow from (I)CSD participants to End Investors*

9. (I)CSD participants, their clients and the onward Chain of Intermediaries, each at its respective level towards its own clients, should comply with standards 5 and 6 above until the information reaches the End Investor. For End Investors, information by means of account statement is deemed sufficient unless provided otherwise in their service level agreement.
10. The information should be communicated to Intermediaries in formatted electronic form using standards defined and used by the securities industry, such as the ISO standards, irrespective of the communication channel used.
11. The information should be communicated to non-Intermediaries, including End Investors, in a clear and comprehensible way.

*Key dates*

12. Key dates are:
  - a) for Distributions relating to securities in nominal (e.g. bonds): Record Date and Payment Date.
  - b) for Distributions relating to securities in units (e.g. shares): Ex Date, Record Date and Payment Date.
13. The public announcement by the Issuer under standard 1 above should be made at least 2 Business Days before the Ex Date.
14. For floating rate instruments, the payable rate should be confirmed as soon as possible but no later than 3 Business Days before the Payment Date.
15. The Ex Date should precede the Record Date by one Settlement Cycle minus one Business Day.
16. The Payment Date should be as close as possible to the Record Date, preferably the next Business Day.

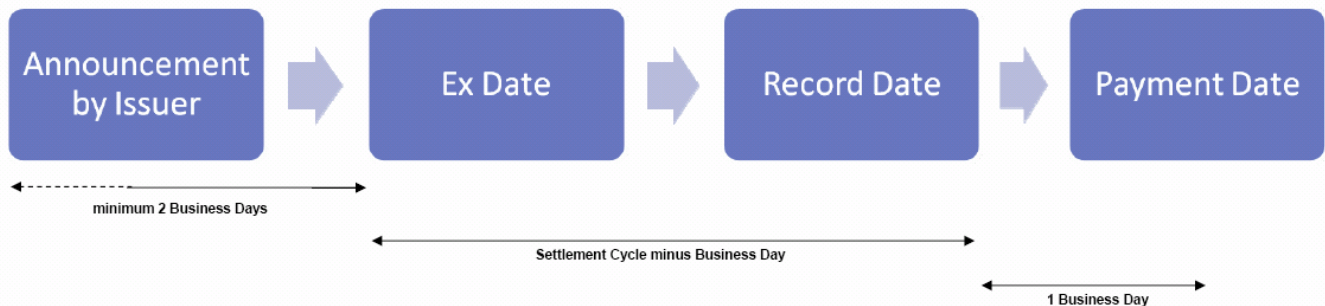
*Processing*

17. Payments should be by Book Entry.
18. Interest Payments should be processed separately from redemptions even if their Payment Dates coincide.
19. All Cash Distributions and related Market Claims should be paid in cash and not coupons.
20. For Payments, the following should apply:
  - a) From Issuers to (I)CSD participants, Payments should be made through the Issuer (I)CSD, using the same Payment mechanism as for other cash transactions through the Issuer (I)CSD.
  - b) Payments by Issuers and Issuer (I)CSDs should be in the original currency as per the announcement under standard 1 above.

- c) The Issuer should make Payments as early as possible after opening of the Payment system and no later than 12:00 noon Issuer (I)CSD local time.
- d) No blocking of holdings for the purpose of Cash Distributions.
- e) If a correction of the Payment is necessary, it should take the form of a complete reversal of the Payment followed by a new correct Payment.

## Securities Distributions

### - Sequence of Dates



### - Market Standards

#### *Information from Issuer to Issuer (I)CSD*

1. The Issuer should inform its Issuer (I)CSD of the details of a Securities Distribution, including the key dates and the ISIN of the outturn security, as soon as the Issuer has publicly announced the Corporate Action according to applicable law. It should also inform the Issuer (I)CSD of any change or confirmation of the Corporate Action and, if applicable, of the reference price for compensation of Fractions by the Issuer.
2. The information should be communicated in formatted electronic form using standards defined and used by the securities industry, such as the ISO standards, irrespective of the communication channel used.
3. For narrative text in the information, Issuers with an international shareholder base should use at least a language customary in the sphere of international finance, currently English.

#### *Information from Issuer (I)CSD to its participants*

4. The Issuer (I)CSD should communicate the information, and any subsequent information, without undue delay of receipt from the Issuer, to all its participants<sup>1</sup> who, at the time of the announcement, have a direct holding or Pending Transaction in the Underlying Security with the Issuer (I)CSD.
5. The Issuer (I)CSD should also inform, without undue delay, any participant who obtains a holding or is subject to a new Transaction on the Underlying Security after the announcement until the Record Date.
6. The information should be communicated in formatted electronic form using standards defined and used by the securities industry, such as the ISO standards, irrespective of the communication channel used.
7. If a Payment needs to be reversed, an announcement, including the reason for such reversal, should be made by the Issuer (I)CSD to all affected parties prior to processing the reversal.

<sup>1</sup> Including Investor (I)CSDs

*Information flow from (I)CSD participants to End Investors*

8. (I)CSD participants, their clients and the onward Chain of Intermediaries, each at its respective level towards its own clients, should comply with standards 4 and 5 above until the information reaches the End Investor. For End Investors, information by means of account statement is deemed sufficient unless provided otherwise in their service level agreement.
9. The information should be communicated to Intermediaries in formatted electronic form using standards defined and used by the securities industry, such as the ISO standards, irrespective of the communication channel used.
10. The information should be communicated to non-Intermediaries, including End Investors, in a clear and comprehensible way.

*Key dates*

11. Key dates are Ex Date, Record Date and Payment Date.
12. The public announcement by the Issuer under standard 1 above should be made at least 2 Business Days before the Ex Date.
13. The Ex Date should precede the Record Date by one Settlement Cycle minus one Business Day.
14. The Payment Date should be the next Business Day after Record Date.

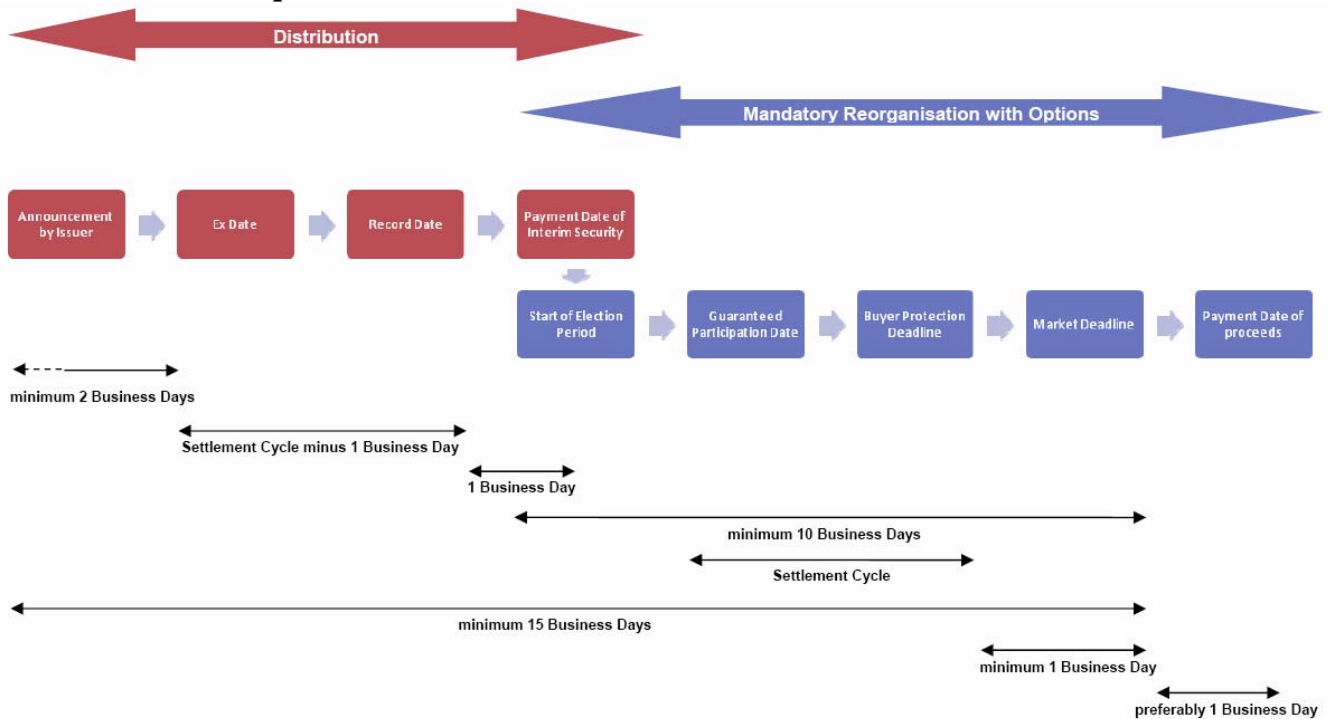
*Processing*

15. Payments should be by Book Entry.
16. For Payments in securities, the following should apply:
  - a) The Issuer should make Payments through the (I)CSD as early as possible and no later than the opening of the settlement system for settlement on the relevant Payment Date.
  - b) The Payments should be processed by rounding down to the nearest whole number (top-down method).
  - c) When Fractions occur and the Issuer compensates them in cash at the level of the Issuer (I)CSD, the Issuer (I)CSD participants and all the Intermediaries down the chain should on their turn, each at its respective level, also compensate any Fractions in cash.
17. For Payments of Fractions in cash, where applicable, the following should apply:
  - a) From Issuers to (I)CSD participants, Payments should be made through the Issuer (I)CSD, using the same Payment mechanism as for other cash transactions through the Issuer (I)CSD.
  - b) Payments by Issuers and Issuer (I)CSDs should be in the original currency as per the announcement under standard 1 above.
  - c) The Issuer should make Payments as early as possible after opening of the Payment system and no later than 12:00 noon Issuer (I)CSD local time.
  - d) If a correction of the Payment is necessary, it should take the form of a complete reversal of the Payment followed by a new correct Payment.



## Distributions with Options

### - Overall Sequence of Dates



### - Market Standards

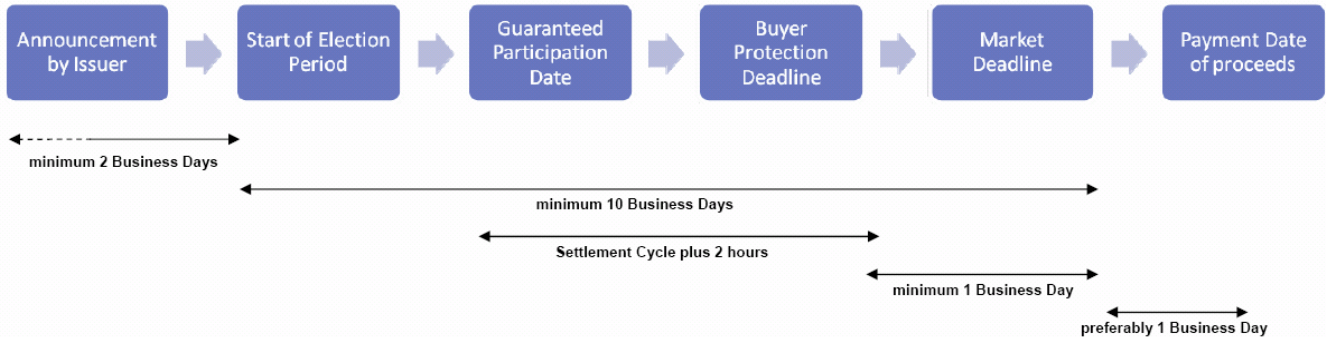
1. Distributions with Options should be represented by an Interim Security with an official ISIN.
2. The issuance of the Interim Security and the options attached to it should be operationally treated as two separate Corporate Actions, the first being a Distribution, the second a Mandatory Reorganisation with Options (or a Voluntary Reorganisation). They should be communicated to the Issuer (ICSD) at the same time and the second Corporate Action type should be indicated in the information of the first Corporate Action.
3. The standards for Securities Distributions should apply to the first Corporate Action, i.e. the Distribution.
4. The standards for Mandatory Reorganisations with Options (or Voluntary Reorganisations) should apply to the second Corporate Action, i.e. the Mandatory Reorganisation with Options (or the Voluntary Reorganisation).
5. The Election Period determined by the Issuer should not start before the Payment Date of the Interim Security.
6. The Intended Settlement Date of any Transaction in the Interim Security should not be prior to the Payment Date of the Interim Security.



## **REORGANISATIONS**

### **Mandatory Reorganisations with Options**

#### **- Sequence of Dates**



#### **- Market Standards**

##### *Information from Issuer to Issuer (I)CSD*

1. The Issuer should inform its Issuer (I)CSD of the details of a Mandatory Reorganisation with Options, including the key dates and the Issuer default option, as soon as the Issuer has publicly announced the Corporate Action according to applicable law. It should inform the Issuer (I)CSD also in case of a change or confirmation of the Corporate Action and, if applicable, of the reference price for compensation of Fractions by the Issuer.
2. The information should be communicated in formatted electronic form using standards defined and used by the securities industry, such as the ISO standards, irrespective of the communication channel used.
3. For narrative text in the information, Issuers with an international shareholder base should use at least a language customary in the sphere of international finance, currently English.

##### *Information from Issuer (I)CSD to its participants*

4. The Issuer (I)CSD should communicate the information, and any subsequent information, without undue delay of receipt from the Issuer, to all its participants<sup>2</sup> who, at the time of the announcement, have a direct holding or Pending Transaction in the Underlying Security with the Issuer (I)CSD.
5. The Issuer (I)CSD should also inform, without undue delay, any participant who obtains a holding or is subject to a new Transaction on the Underlying Security after the announcement until the Market Deadline.
6. The information should be communicated in formatted electronic form using standards defined and used by the securities industry, such as the ISO standards, irrespective of the communication channel used.
7. If a Payment needs to be reversed, an announcement, including the reason for such reversal, should be made by the Issuer (I)CSD to all affected parties prior to processing the reversal.

<sup>2</sup> Including Investor (I)CSDs

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*Information flow from (I)CSD participants to End Investors*

8. (I)CSD participants, their clients and the onward Chain of Intermediaries, each at its respective level towards its own clients, should comply with standards 4 and 5 above until the information reaches the End Investor.
9. The information should be communicated to Intermediaries in formatted electronic form using standards defined and used by the securities industry, such as the ISO standards, irrespective of the communication channel used.
10. The information should be communicated to non-Intermediaries, including End Investors, in a clear and comprehensible way.

*Key dates*

11. The public announcement by the Issuer under standard 1 above should be made at least 2 Business Days before the start of the Election Period.
12. The start of the Election Period as determined by the Issuer should be at least 10 Business Days before the Market Deadline<sup>3</sup>.
13. The Guaranteed Participation Date should precede the Buyer Protection Deadline by one Settlement Cycle plus two hours<sup>4</sup>.
14. The Buyer Protection Deadline should be at least one Business Day before the Market Deadline.
15. The Payment Date of the elected Option should be as close as possible to the Market Deadline, preferably the next Business Day.

*Processing*

16. Payments should be by Book Entry.
17. An ISIN that is different from the ISIN of the Underlying Security should be allocated to each outturn security.
18. Each option should have a unique identifier provided by the Issuer, that will be maintained by the Issuer (I)CSD and all Intermediaries.
19. Elections should be communicated from the last intermediary in the Chain of Intermediaries up to the Issuer in formatted electronic form using standards defined and used by the securities industry such as the ISO standards, irrespective of the communication channel used.
20. Underlying Securities<sub>1</sub> on which an election is made should be separated accounting-wise from non-elected Underlying Securities<sub>1</sub> by the (I)CSD and all Intermediaries.
21. For non-elected Underlying Securities<sup>5</sup>, the default option as announced by the Issuer should apply.
22. For Payments in cash, the following should apply:
  - a) From Issuers to (I)CSD participants, Payments should be made through the Issuer (I)CSD, using the same Payment mechanism as for other cash transactions through the Issuer (I)CSD.
  - b) Payments by Issuers and Issuer (I)CSDs should be in the original currency as per the announcement under standard 1 above.

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<sup>3</sup> In case of multiple deadlines, the earliest deadline is meant here.

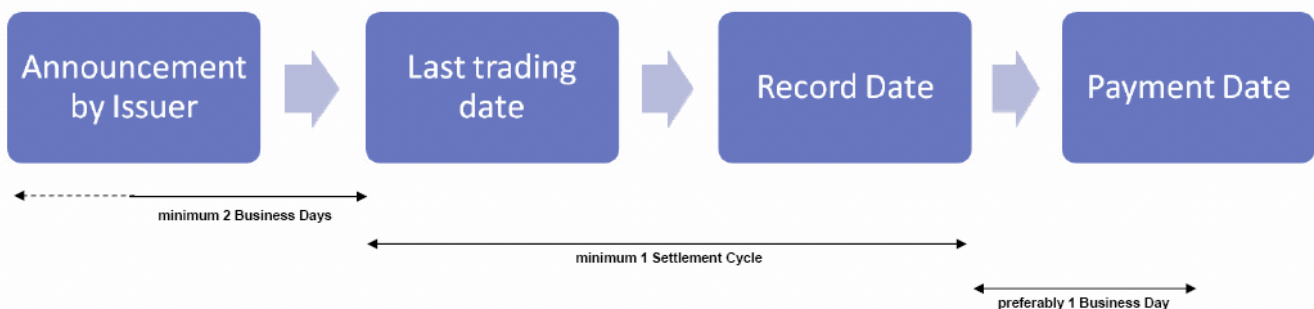
<sup>4</sup> Buyer Protection should thus still be possible for two hours after closing of settlement on the day of the Buyer Protection Deadline.

<sup>5</sup> Interim Security in case the Mandatory Reorganisation with Option is the second Corporate Action in a Distribution with Options.

- c) The Issuer should make Payments as early as possible after opening of the Payment system and no later than 12:00 noon, Issuer (I)CSD local time.
  - d) If a correction of the Payment is necessary, it should take the form of a complete reversal of the Payment followed by a new correct Payment.
23. For Payments in securities, the following should apply:
- a) The Issuer should make Payments to the (I)CSD as early as possible and no later than the opening of the settlement system for settlement on the relevant Payment Date.
  - b) The Payments should be processed by rounding down to the nearest whole number (top-down method).
  - c) When Fractions occur and the Issuer compensates them in cash at the level of the Issuer (I)CSD, the Issuer (I)CSD participants and all the Intermediaries down the chain should on their turn, each at its respective level, also compensate any Fractions in cash.

### **Mandatory Reorganisations**

#### **- Sequence of Dates**



#### **- Market Standards**

##### *Information from Issuer to Issuer (I)CSD*

1. The Issuer should inform its Issuer (I)CSD of the details of a Mandatory Reorganisation, including the key dates, as soon as the Issuer has publicly announced the Corporate Action according to applicable law. It should also inform the Issuer (I)CSD of any change or confirmation of the Corporate Action and, if applicable, the reference price for compensation of Fractions by the Issuer.
2. The information should be communicated in formatted electronic form using standards defined and used by the securities industry, such as the ISO standards, irrespective of the communication channel used.
3. For narrative text in the information, Issuers with an international shareholder base should use at least a language customary in the sphere of international finance, currently English.

##### *Information from Issuer (I)CSD to participants .*

4. The Issuer (I)CSD should communicate the information, and any subsequent information, without undue delay of receipt from the Issuer, to all its

participants<sup>1</sup> who, at the time of the announcement, have a direct holding or Pending Transaction in the Underlying Security with the Issuer (ICSD).

5. The Issuer (ICSD) should also inform, without undue delay, any participant who obtains a holding or is subject to a new Transaction on the Underlying Security after the announcement until the Record Date.
6. The information should be communicated in formatted electronic form using standards defined and used by the securities industry, such as the ISO standards, irrespective of the communication channel used.
7. If a Payment needs to be reversed, an announcement, including the reason for such reversal, should be made by the Issuer (ICSD) to all affected parties prior to processing the reversal.

#### *Information flow from (I)CSD participants to End Investors*

8. (ICSD) participants, their clients and the onward Chain of Intermediaries, each at its respective level towards its own clients, should comply with standards 4 and 5 above until the information reaches the End Investor.
9. The information should be communicated to Intermediaries in formatted electronic form using standards defined and used by the securities industry, such as the ISO standards, irrespective of the communication channel used.
10. The information should be communicated to non-Intermediaries, including End Investors, in a clear and comprehensible way.

#### *Key dates*

11. The public announcement by the Issuer under standard 1 above should be at least 2 Business Days before the last trading date as determined by the Issuer.
12. The last trading date, i.e. the last date to trade the Underlying Security in the old ISIN, should precede the Record Date by at least one Settlement Cycle.
13. The Payment Date should be as close as possible to the Record Date, preferably the next Business Day for cash outturns and the next Business Day for securities outturns.

#### *Processing*

14. Payments should be by Book Entry.
15. Redemptions should be processed separately from Interest Payments even if their Payment Dates coincide.
16. An ISIN that is different from the ISIN of the Underlying Security should be allocated to each outturn security.
17. For Payments in cash, the following should apply:
  - a) From Issuers to (ICSD) participants, Payments should be made through the Issuer (ICSD), using the same Payment mechanism as for other cash transactions through the Issuer (ICSD).
  - b) Payments by Issuers and Issuer (ICSDs) should be in the original currency as per the announcement under standard 1 above.
  - c) The Issuer should make Payments as early as possible after opening of the Payment system and no later than 12:00 noon, Issuer (ICSD) local time.
  - d) If a correction of the Payment is necessary, it should take the form of a complete reversal of the Payment followed by a new correct Payment.
18. For Payments in securities, the following should apply:

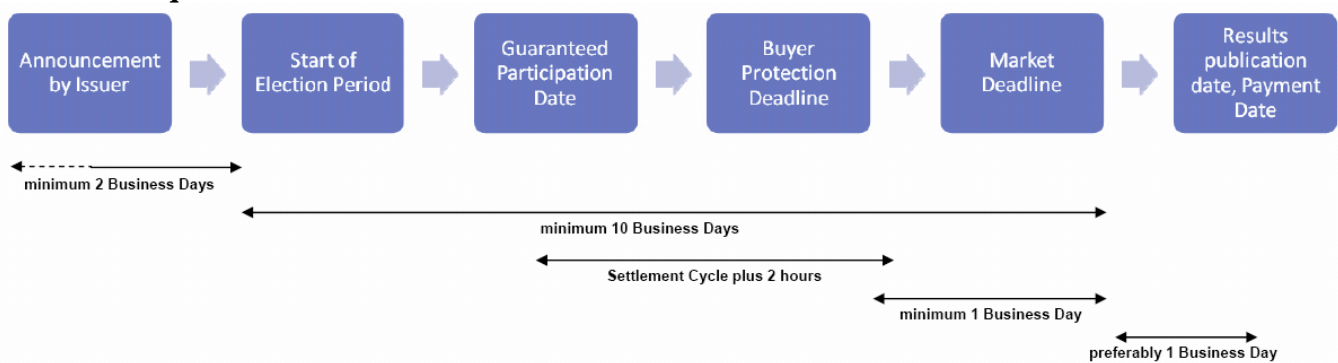
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<sup>1</sup> Including Investor (ICSDs)

- a) The Issuer should make Payments to the (I)CSD as early as possible and no later than the opening of the settlement system for settlement on the relevant Payment Date.
- b) The Payments should be processed by rounding down to the nearest whole number (top-down method).
- c) When Fractions occur and the Issuer compensates them in cash at the level of the Issuer (I)CSD, the Issuer (I)CSD participants and all the Intermediaries down the chain should on their turn, each at its respective level, also compensate any Fractions in cash.

## **Voluntary Reorganisations**

### **- Sequence of Dates**



### **- Market Standards**

#### *Information from Issuer/Offeror to Issuer (I)CSD*

1. The Issuer or the Offeror, as the case may be, should inform the Issuer (I)CSD of the details of a Voluntary Reorganisation, including the key dates, as soon as the Issuer, or the Offeror, has publicly announced the Corporate Action according to applicable law. The Issuer or the Offeror, as the case may be, should also inform the Issuer (I)CSD of any change or confirmation of the Corporate Action.
2. The information should be communicated in formatted electronic form using standards defined and used by the securities industry, such as the ISO standards, irrespective of the communication channel used.
3. For narrative text in the information, Issuers with an international shareholder base should use at least a language customary in the sphere of international finance, currently English.

#### *Information from Issuer (I)CSD to its participants*

4. The Issuer (I)CSD should communicate the information, and any subsequent information, without undue delay of receipt from the Issuer or the Offeror, as the case may be, to all its participants<sup>1</sup> who, at the time of the announcement, have a direct holding or Pending Transaction in the Underlying Security with the Issuer (I)CSD.
5. The Issuer (I)CSD should also inform, without undue delay, any participant who obtains a holding or is subject to a new Transaction on the Underlying Security after the announcement until the Market Deadline.

<sup>1</sup> Including Investor (I)CSDs

6. The information should be communicated in formatted electronic form using standards defined and used by the securities industry, such as the ISO standards, irrespective of the communication channel used.
7. If a Payment needs to be reversed, an announcement, including the reason for such reversal, should be made by the Issuer (I)CSD to all affected parties prior to processing the reversal.

*Information flow from (I)CSD participants to End Investors*

8. (I)CSD participants, their clients and the onward Chain of Intermediaries, each at its respective level towards its own clients, should comply with standards 4 and 5 above until the information reaches the End Investor.
9. The information should be communicated to Intermediaries in formatted electronic form using standards defined and used by the securities industry, such as the ISO standards, irrespective from the communication channel used.
10. The information should be communicated to non-Intermediaries, including End Investors, in a clear and comprehensible way.

*Key dates*

11. The public announcement by the Issuer or the Offeror, as the case may be, under standard 1 above should be made at least 2 Business Days before the start of the Election Period as determined by the Issuer or the Offeror respectively.
12. The start of the Election Period as determined by the Issuer or the Offeror, as the case may be, should be at least 10 Business Days before the Market Deadline<sup>2</sup>.
13. The Guaranteed Participation Date should precede the Buyer Protection Deadline by one Settlement Cycle plus two hours<sup>3</sup>.
14. The Buyer Protection Deadline should be at least one Business Day before the Market Deadline.
15. The Payment Date should be as close as possible to the Market Deadline, preferably the next Business Day.
16. When the Voluntary Reorganisation is conditional, the Issuer or the Offeror, as the case may be, should publish the result of the elections. The results publication date should follow the Market Deadline as soon as possible, preferably the next Business Day, but before the Payment is made. Payment Date should preferably be 1 Business Day after results publication date.

*Processing*

17. Payments should be by Book Entry.
18. An ISIN that is different from the ISIN of the Underlying Security should be allocated to each outturn security.
19. Each Option should have a unique identifier provided by the Issuer or the Offeror, as the case may be, that will be maintained by the Issuer (I)CSD and all Intermediaries.
20. Elections should be communicated from the last intermediary in the Chain of Intermediaries up to the Issuer or the Offeror, as the case may be, in formatted

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<sup>2</sup> In case of multiple deadlines, the earliest deadline is meant here.

<sup>3</sup> Buyer Protection should thus still be possible for two hours after closing of settlement on the day of the Buyer Protection Deadline.



- electronic form using standards defined and used by the securities industry such as the ISO standards, irrespective of the communication channel used.
21. Securities on which an election is made should be separated accounting-wise by the (I)CSD and all Intermediaries from non-elected securities.
  22. For Payments in cash, the following should apply:
    - a) From Issuers or Offerors to (I)CSD participants, Payments should be made through the Issuer (I)CSD using the same Payment mechanism as for other cash transactions through the Issuer (I)CSD.
    - b) Payments by Issuers, Offerors and Issuer (I)CSDs should be in the original currency as per the announcement under standard 1 above.
    - c) The Issuer or the Offeror, as the case may be, should make Payments as early as possible after opening of the Payment system and no later than 12:00 noon Issuer (I)CSD local time.
    - d) If a correction of the Payment is necessary, it should take the form of a complete reversal of the Payment followed by a new, correct Payment.
  23. For Payments in securities the Issuer or the Offeror, as the case may be, should make Payments to the Issuer (I)CSD as early as possible and no later than the opening of the settlement system for settlements on the relevant Payment Date.

### ***TRANSACTIONS MANAGEMENT***

Transaction management provides market standards for Market Claims, Transformations and Buyer Protections<sup>4</sup>. The standards on transaction management should apply to all types of Transactions unless agreed otherwise by the parties to it. They rely on the application of and compliance with the agreed ECSDA/ESF Matching Standards<sup>5</sup>.

The standards aim at:

- a) enabling the automation of the transaction management processes to ensure their timely and efficient settlement;
- b) protecting the right of both the buyer and the seller;
- c) limiting the intervention of each party involved; and
- d) reducing the number of Transactions to be managed considering that such process requires a reconciliation effort.

This chapter is split into 3 parts in accordance with the category of the Corporate Action:

- ◇ Market claim resulting from a Distribution
- ◇ Transformation resulting from a Reorganisation
- ◇ Buyer Protection for an Elective Corporate Action that a buyer can use if the Transaction is still unsettled whilst the Market Deadline is approaching.

The CAJWG examined the question of the fiscal status of the cash Market Claim of a Pending Transaction impacted by a Cash Distribution and consequently the exact cash amount applicable for the Market Claim. Uncertainty remains regarding the exact moment of transfer of ownership from a fiscal point of view and different approaches

<sup>4</sup> For Target2-Securities more detailed processes have been proposed by the T2S Corporate Actions Sub Group (CASG)

<sup>5</sup> [https://www.ecsda.com/attachments/media\\_centre/press\\_releases/ESF%20ECSDA%20Matching%20Standards%20Oct06.doc](https://www.ecsda.com/attachments/media_centre/press_releases/ESF%20ECSDA%20Matching%20Standards%20Oct06.doc)  
<http://essf.sifma.org/publications/documents/ESF-ECSDAMatchingStandardsOct06.pdf>

co-exist in Europe. The CAJWG has identified this fiscal issue but acknowledges its limitation of competence and would recommend referring it to the FISCO group (Giovannini Barrier 11). The CAJWG believes that efforts to improve consistency and common fiscal treatment across markets and countries are essential to reap the full benefit of the EU financial market integration. The preferred solution of the CAJWG is that the default withholding rate applied to Market Claims should be determined by the Issuer (ICSD).

## **Market Claims**

### **- Market Standards**

#### *Creation*

1. Market Claims should be created, as a separate Transaction without changing the Underlying Transaction, by the (I)CSD or the CCP for all irrevocable settlement transactions (as defined in each market) as follows:
  - a) For securities in units (e.g. shares);
    - From the seller to the buyer, when trade date is before Ex Date and there is a Pending Transaction at close of business of Record Date; or
    - From the buyer to the seller, when trade date is on or after Ex Date and Actual Settlement Date is on or before Record Date.
  - b) For securities in nominal (e.g. bonds): from the seller to the buyer, if the Intended Settlement Date is on or before the Record Date but there is a Pending Transaction at close of business on Record Date.
2. Concurring Bilateral Input should allow to determine whether the underlying trade is “ex” or “cum” and the (I)CSD or CCP should take this into account for the creation of a Market Claim, irrespective of the actual Ex Date.

#### *Processing*

3. The (I)CSD or the CCP should create the Market Claims by end of Record Date or, for Transactions that become eligible for a Market Claim after Record Date, as soon as possible and not later than 20 Business Days thereafter.
4. All Market Claims should be in the outturn of the Distribution to which they relate.
5. The Intended Settlement Date of the Market Claim should be on the Payment Date. If it is created after the Payment Date, it should be on the earliest settlement date.
6. The settlement of the Market Claim should be independent from the settlement of the Underlying Transaction to which the Market Claim relates. However, (I)CSDs should provide a user friendly tool to manage the interdependency between the Market Claim and the Underlying Transaction.
7. The withholding rate applied to the Distribution by the Issuer (I)CSD should also apply to the Market Claim.

#### *Reporting*

8. Market Claims should be reported as such by the (I)CSD or the CCP and any other participant down the Chain of Intermediaries, at both the time of the creation and the settlement of the Market Claim, referencing both the Distribution and the Underlying Transaction that gave rise to the Market Claim.



9. The reporting should be done in formatted electronic form using standards defined and used by the industry, such as the ISO standards, irrespective of the communication channel used.

## **Transformations**

### **- Market Standards**

1. A Transformation should be processed for Pending Transactions on Record Date in the event of a Mandatory Reorganisation and, when a Buyer Protection has been agreed, a Voluntary Reorganisation.
2. The (I)CSD or the CCP should process the Transformation, cancelling matched instructions still pending by the end of Record Date (“Original Transaction”) and replacing them by new matched instructions in the outturn ISIN and/or cash (“Replacement Transaction”) in accordance with the terms of the Reorganisation. The old trade date should remain unchanged in the Transformation.
3. Opt-out facilities should be allowed for Bilateral Input if both parties agree. In case of an opt-out the Original Transaction is cancelled but no new Transaction generated.

### *Processing*

4. The Transformation should be carried out by the (I)CSD or the CCP between end of Record Date for Mandatory Reorganisations or end of Market Deadline for Voluntary Reorganisations and the opening of the securities settlement system for value next Business Day.
5. For Mandatory Reorganisations settlement in the old ISIN should be discontinued after the Record Date or the Market Deadline, as applicable. Input of instruction in the old ISIN should still be possible after the Guaranteed Participation Date / last trading date for instruction with trade date before or on the Guaranteed Participation Date / last trading date. If such instructions match, they will automatically be transformed. Instruction with trade date after Guaranteed Participation Date / last trading date should always be in the new ISIN.
6. The Replacement Transaction should neither settle before the Payment Date nor before the Intended Settlement Date of the Underlying Transaction.
7. In case of multiple outturns, each Replacement Transaction should be allowed to settle irrespective of the others.
8. When the Reorganisation consists of the replacement of an Underlying Security by cash (typically a final redemption), the Transformation will result in exchanging cash against cash. To ease the reconciliation process (or for fiscal reasons), two new Transactions<sup>6</sup> should be created, one for the original cash amount and the other one for the cash benefit of the Reorganisation.
9. When the outturns generate Fractions the number of outturn shares should be rounded down to the nearest whole number.
  - a) When the Issuer compensates the Fractions in cash, an additional cash Transaction should be created with a cash amount equal to the number

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<sup>6</sup> E.g.: ISIN A is replaced by 10 euro. Before Transformation, a DVP Transaction “X has to deliver 10 ISIN A to Y against 90 euro would become “X has to deliver (10X10) euro to Y against 90 euro.” 2 new transactions should be created: “X has to pay 100 euro to Y “ and “Y has to pay 90 euro to X”. The reference of the underlying ISIN (nihil Quantity) could facilitate the reconciliation.

of residual Fractions multiplied by the applicable price, and credited to the buyer<sup>7</sup>.

- b) When net CCP transactions are involved in a Transformation process with Fractions, the CCP could adjust (when necessarily required) the number of new shares and Fractions to maintain a balance between net buyers and net sellers. The price of each Fraction should be the Issuer's price and the impacted net Transaction(s) should be reduced to their minimum.

### *Reporting*

10. Transformations should be reported as such by the (I)CSD and the CCP and any other participant down the Chain of Intermediaries, referencing both the Original Transaction and the Replacement Transaction as well as the Reorganisation reference number of the concerned Corporate Action.
11. The reporting should be done in formatted electronic form using standards defined and used by the industry such as the ISO standards, irrespective of the communication channel used.

### **Buyer Protections**

The CAJWG acknowledges that there are other means of warranting buyer protection than an institutionalised service provided by market infrastructure organisations, e.g. bi-lateral agreement between the respective trading parties. In this case the essence (but not necessarily the form and the instruments) of Standards 1 to 4 should apply. However, all Standards should apply in markets with an institutionalised Buyer Protection service.

#### **- Market Standards**

##### *Creation*

1. A Buyer Protection instruction should be created by the buyer, referencing the Corporate Action, the chosen option(s), the quantity of securities and the Underlying Transaction.
2. The Buyer Protection instruction should be communicated from the buyer to the seller without undue delay via the Chain of Intermediaries and the (I)CSDs in formatted electronic form using standards defined and used by the securities industry such as the ISO standards, irrespective of the communication channel used.

##### *Processing*

3. The Buyer Protection Deadline should follow the Guaranteed Participation Date by a Settlement Cycle plus two hours<sup>8</sup>.

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<sup>7</sup> E.g.: 3 ISIN A are replaced by 1 ISIN B, and each fraction A is compensated at 5 euro. Before Transformation a DVP Transaction "X has to deliver 11 ISIN A to Y against 60 euro." The top down method rounded down to the nearest whole number allows to transform 9 A whilst 2 A remain fractional. 2 new transactions should be created: "X has to deliver 3 ISIN B to Y against 60 euro" and "X has to pay (2X5) euro to Y".

<sup>8</sup> Buyer Protection should thus still be possible for two hours after closing of settlement on the day of the Buyer Protection Deadline

4. The Buyer Protection Deadline should be at least one Business Day before the Market Deadline.
5. Any Buyer Protection instruction by the buyer prior to the Buyer Protection Deadline and related to a Transaction for which the trade date is on or before the Guaranteed Participation Date, should be accepted without requiring a Matching.
6. Standard 5 above should apply also in case of Buyer Protection instructions being raised against CCPs.
7. Buyer Protection Deadlines should be identical across (I)CSDs in Europe.
8. In regard of any Buyer Protection instruction by the buyer prior to the Buyer Protection Deadline, settlement of the Underlying Transaction should be allowed until the Buyer Protection Deadline.
9. A Buyer Protection instruction attached to a Pending Transaction that finally settles on or before the Buyer Protection Deadline (end of settlement process) should be void.
10. Transactions attached with a valid Buyer Protection that are still pending on the Buyer Protection Deadline should be frozen until their Transformation. This should ensure that the seller executes the buyer's Buyer Protection instruction.
11. The Transformation of the Underlying Transaction should be carried out, in accordance with the Buyer Protection instruction, on the Market Deadline/ Record Date of the concerned Elective Corporate Action.
12. For Mandatory Reorganisations with Options, non elected Transactions should transform into the default option set by the Issuer (I)CSD.

## GLOSSARY

*Note: Definitions given in this glossary are for the purpose of the standards on Corporate Actions only and are not intended to have any legal connotations or to reflect current market practices*

<b>Actual Settlement Date</b>	Date on which the settlement effectively takes place
<b>Bilateral Input</b>	Instructions submitted by both parties to settlement as opposed to direct input, which is submitted by third parties.
<b>Book Entry</b>	Accounting of securities and other financial assets in dematerialised or immobilised form.
<b>Business Day</b>	Business day at the Issuer (I)CSD.
<b>Buyer Protection</b>	Process whereby a buyer who has yet to receive the Underlying Securities of an Elective Corporate Action, instructs the seller in order to receive the outturn of his choice.
<b>Buyer Protection Deadline</b>	Last day and time by which a Buyer Protection instruction can be given.
<b>CCP</b>	Central counterparty, i.e. an entity that interposes itself

	between the two parties to a trade, becoming the buyer to every seller and the seller to every buyer.
<b>Cash Distribution</b>	A Distribution where the proceeds consist of cash only.
<b>Chain of Intermediaries</b>	Sequence of Intermediaries connecting the Issuer / Issuer CSD with the End Investor and vice versa in respect of securities held by Book Entry in a securities account.
<b>Corporate Action</b>	Action initiated upon a security by the Issuer or an Offeror.
<b>Distribution</b>	Corporate Action whereby the Issuer of a security delivers particular proceeds to the holder of the Underlying Security without affecting the Underlying Security.
<b>Distribution with Options</b>	A Distribution with a choice of proceeds.
<b>Election Period</b>	Period during which elections can be made.
<b>Elective Corporate Action</b>	Distribution with Options, Mandatory Reorganisation with Options or Voluntary Reorganisation.
<b>End Investor</b>	Physical or legal person who holds the security for his own account, not including the holder of a unit of a UCIT (undertaking for collective investments in transferable securities).
<b>Ex Date</b>	Date from which the Underlying Security is traded without the benefit / right attached to it.
<b>Fractions</b>	The number of Underlying Securities remaining after the calculation of the entitlement to the proceeds of a Corporate Action.  <p style="text-align: center;"><b>or</b></p> The decimal part of the balance of outturn securities resulting from the calculation of the proceeds of a Corporate Action.
<b>Guaranteed Participation Date</b>	Last date to buy the Underlying Security with the right attached to participate in an Elective Corporate Action.
<b>(I)CSD</b>	(International) Central Securities Depository
<b>Intended Settlement Date</b>	Date on which a Transaction is due to settle.
<b>Interim Security</b>	Short term transferable operational instrument, issued for processing purposes only, which is not representative of the Issuer's capital.

<b>Intermediaries</b>	Financial institutions that provide and maintain securities accounts.
<b>Investor (I)CSD</b>	(I)CSD that holds securities with another (I)CSD or with an Intermediary.
<b>ISIN</b>	International Securities Identification Number
<b>ISO</b>	International Organization for Standardisation
<b>Issuer</b>	The issuer of an Underlying Security including the agent mandated by the Issuer for Corporate Actions purposes.
<b>Issuer (I)CSD</b>	(I)CSD with whom the Issuer has deposited and maintains its primary securities issuance by Book Entry.
<b>Mandatory Reorganisation</b>	A Reorganisation that mandatorily affects the Underlying Security.
<b>Mandatory Reorganisation with Options</b>	A Mandatory Reorganisation with a choice of proceeds.
<b>Market Claim</b>	Process to reallocate the proceeds of a Distribution to the contractually entitled party.
<b>Market Deadline</b>	Last date and time, preferably end of day, to send election instructions to the Issuer (I)CSD.
<b>Matching</b>	Process of comparing the two relevant settlement instructions as provided by the two counterparties to ensure that they match.
<b>Offeror</b>	Party (other than the Issuer) including its agent, offering a Voluntary Reorganisation.
<b>Payment</b>	Delivery of the proceeds of a Corporate Action.
<b>Payment Date</b>	Date on which the Payment is due.
<b>Pending Transaction</b>	Unsettled Transaction.
<b>Record Date</b>	Date on which settled positions are struck in the books of the Issuer (I)CSD at close of business to determine the entitlement to the proceeds of a Corporate Action.

<b>Reorganisation</b>	A Corporate Action whereby the Underlying Security is replaced with proceeds.
<b>Securities Distribution</b>	A Distribution where the proceeds consist of securities.
<b>Settlement Cycle</b>	Number of Business Days from the trade date to the Intended Settlement Date.
<b>Transaction</b>	The result of Matching.
<b>Transformation</b>	Process by which Pending Transactions, on or after Record Date / Market Deadline, are cancelled and replaced by new Transactions in accordance with the terms of the Reorganisation.
<b>Underlying Security</b>	Security that is the subject of a Corporate Action.
<b>Underlying Transaction</b>	Transaction upon which a Market Claim, Transformation or Buyer Protection is applied.
<b>Voluntary Reorganisation</b>	A Reorganisation in which participation is optional for the holder of the Underlying Security.

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JOINT WORKING GROUP**

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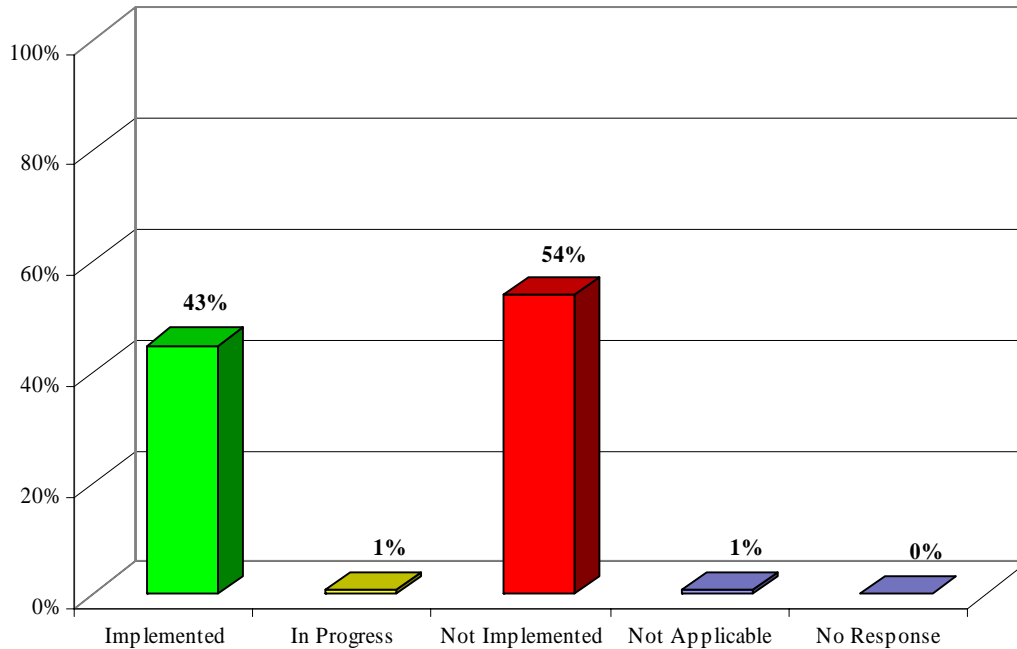
European Issuers

Thiebald Cremers	BNPParibas
Dorien Fransens	EuropeanIssuers
Markus Kaum	Munich Re
Mario Rosario Maglione	Servizio Titoli
Françoise Nikly-Cyrot	Lagardère

## Annex 2: Gap analysis by country

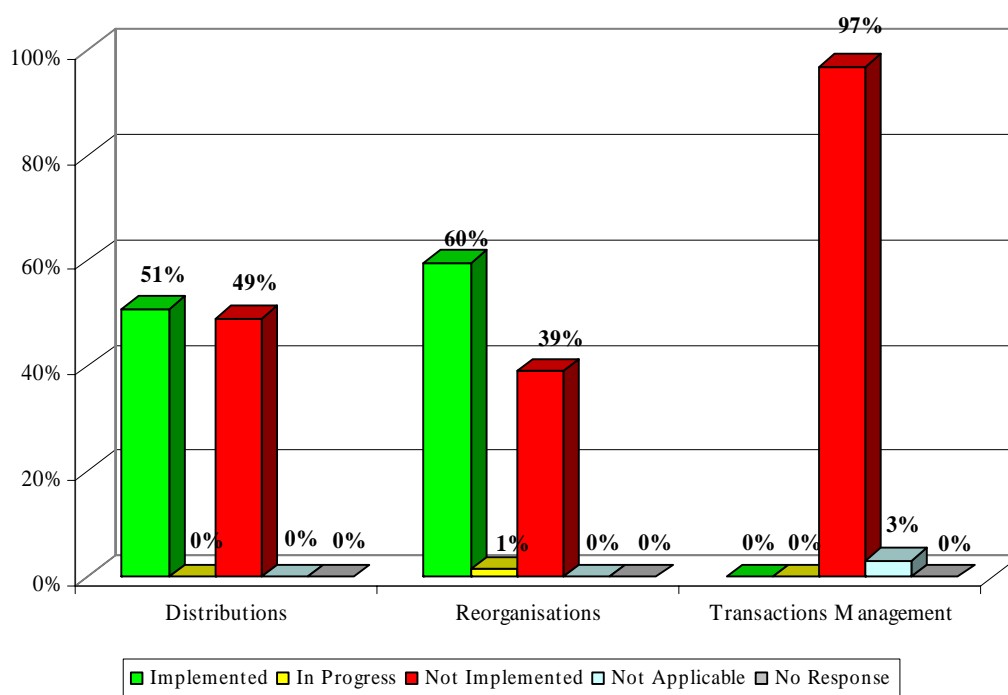
### Austria

#### Standards Overview



**Figure 15: Austria - Standards Overview**

#### Category Overview

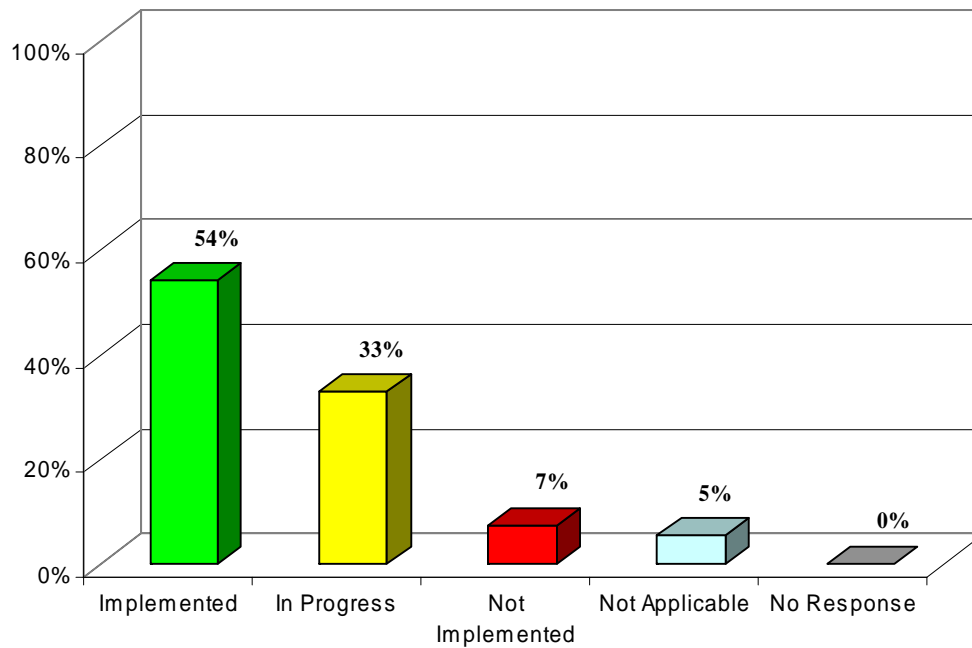


**Figure 16: Austria - Category Overview**



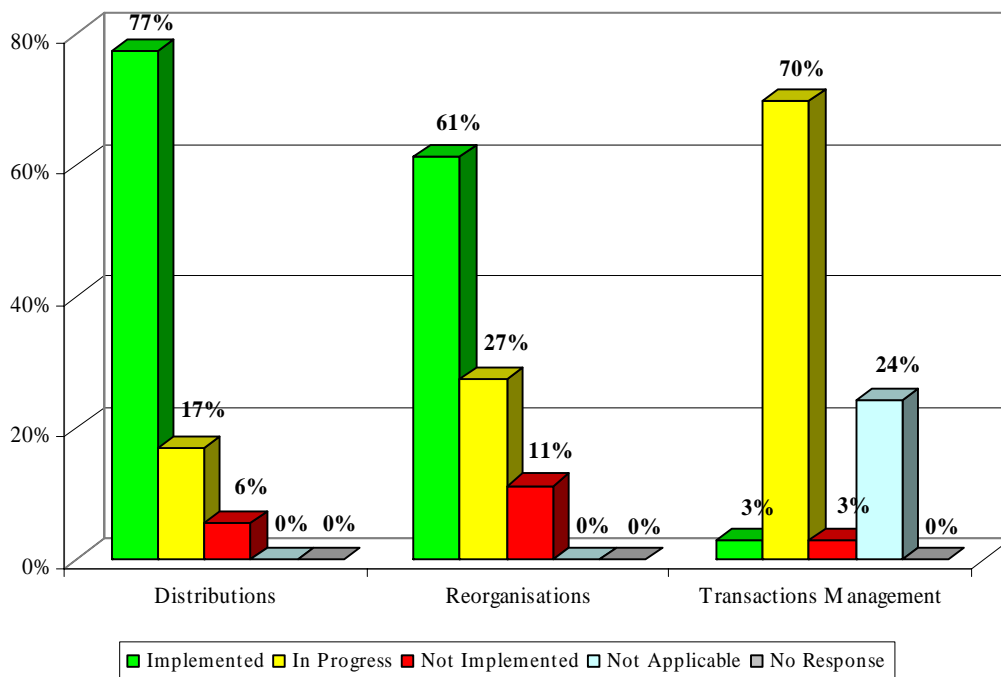
**Belgium**

**Standards Overview**



**Figure 17: Belgium - Standards Overview**

**Category Overview**



**Figure 18: Belgium - Category Overview**

## Denmark

### Standards Overview

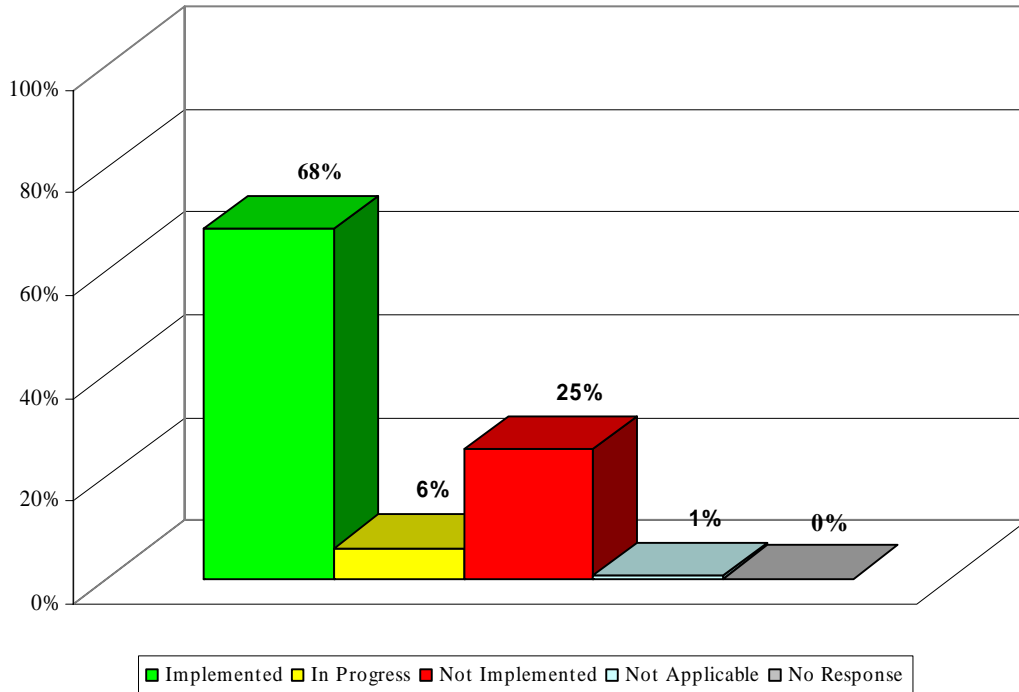


Figure 19: Denmark - Standards Overview

### Category Overview

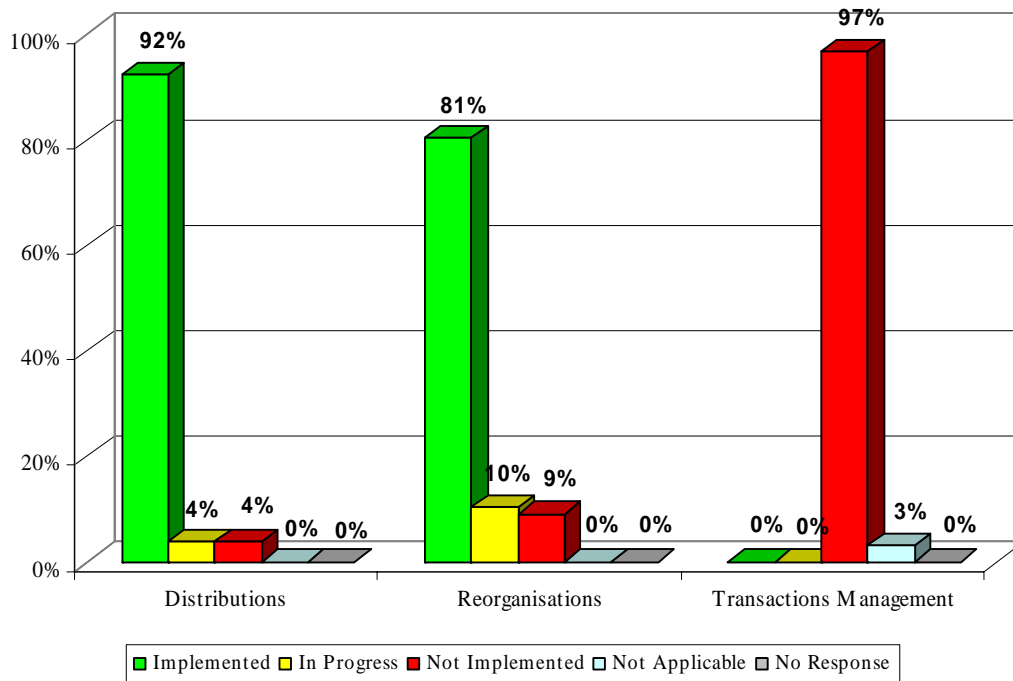
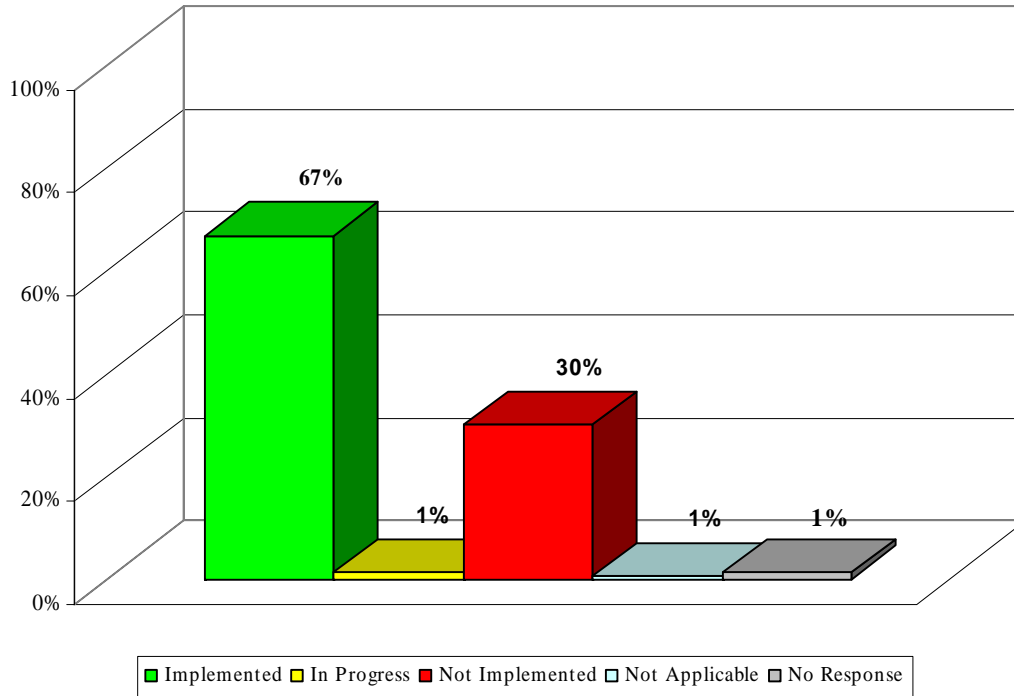


Figure 20: Denmark - Category Overview

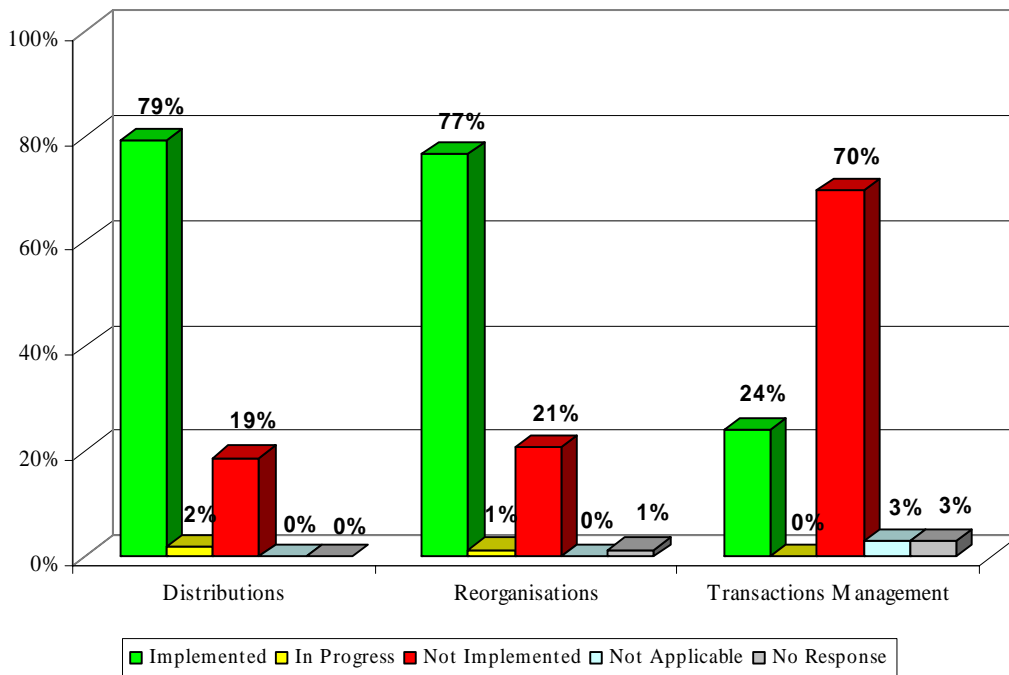
**Estonia**

**Standards Overview**



**Figure 21: Estonia - Standards Overview**

**Category Overview**



**Figure 22: Estonia - Category Overview**

## Finland

### Standards Overview

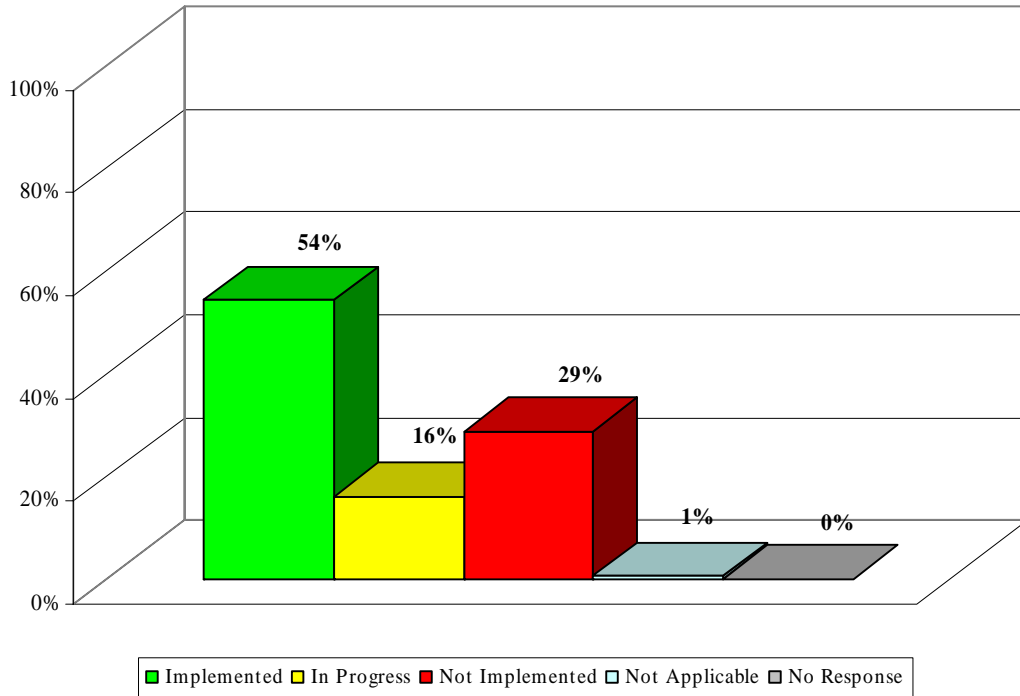


Figure 23: Finland - Standards Overview

### Category Overview

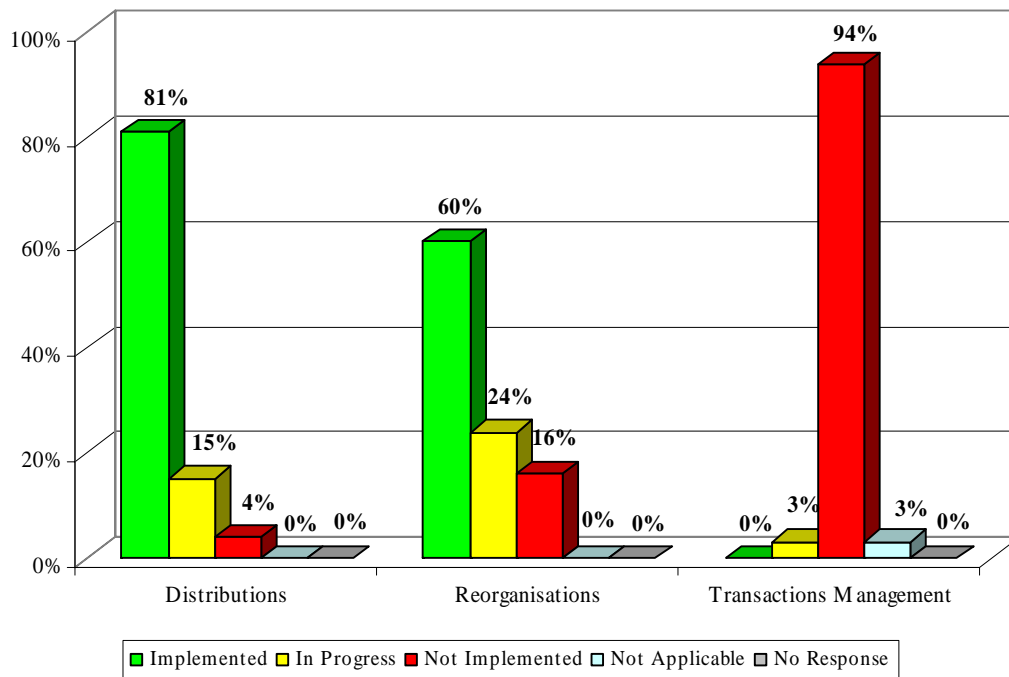
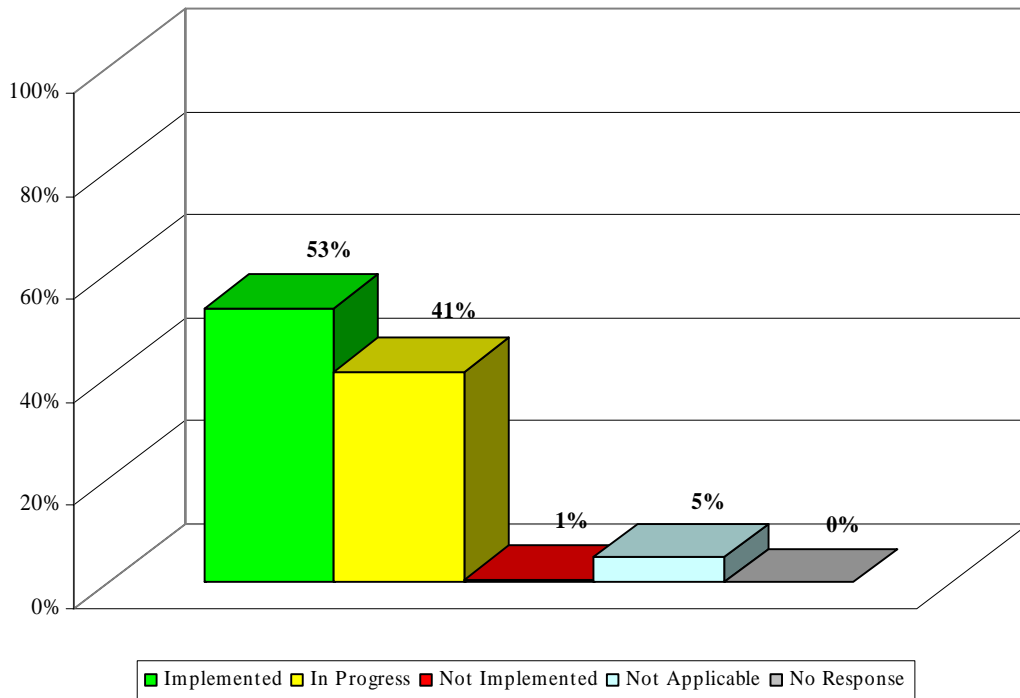


Figure 24: Finland - Category Overview

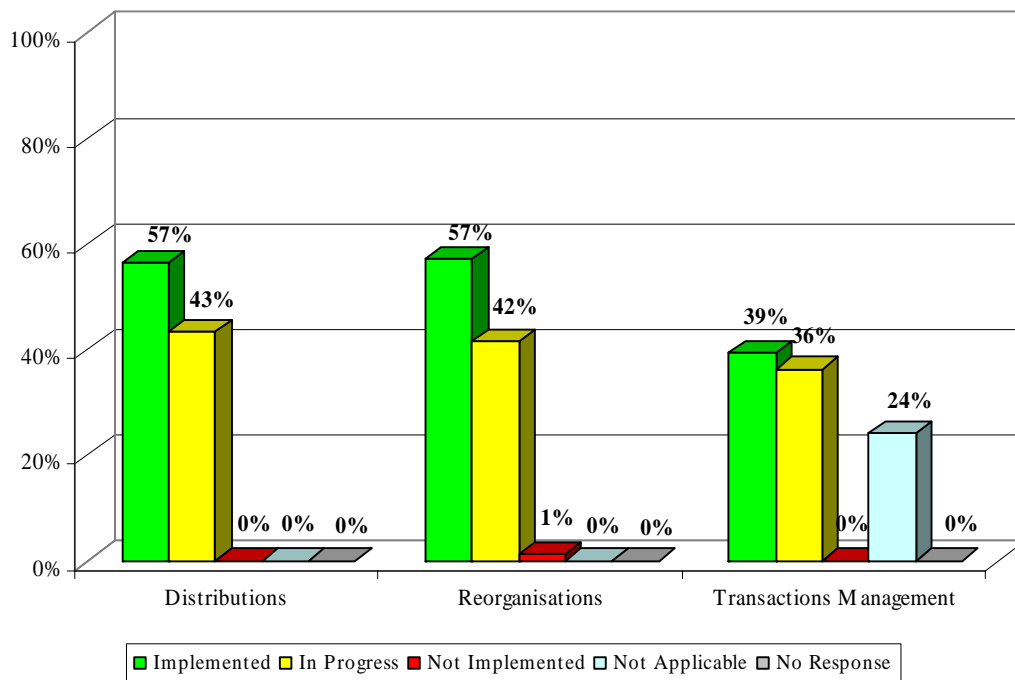
**France**

**Standards Overview**



**Figure 25: France - Standards Overview**

**Category Overview**



**Figure 26: France - Category Overview**

## Germany

### Standards Overview

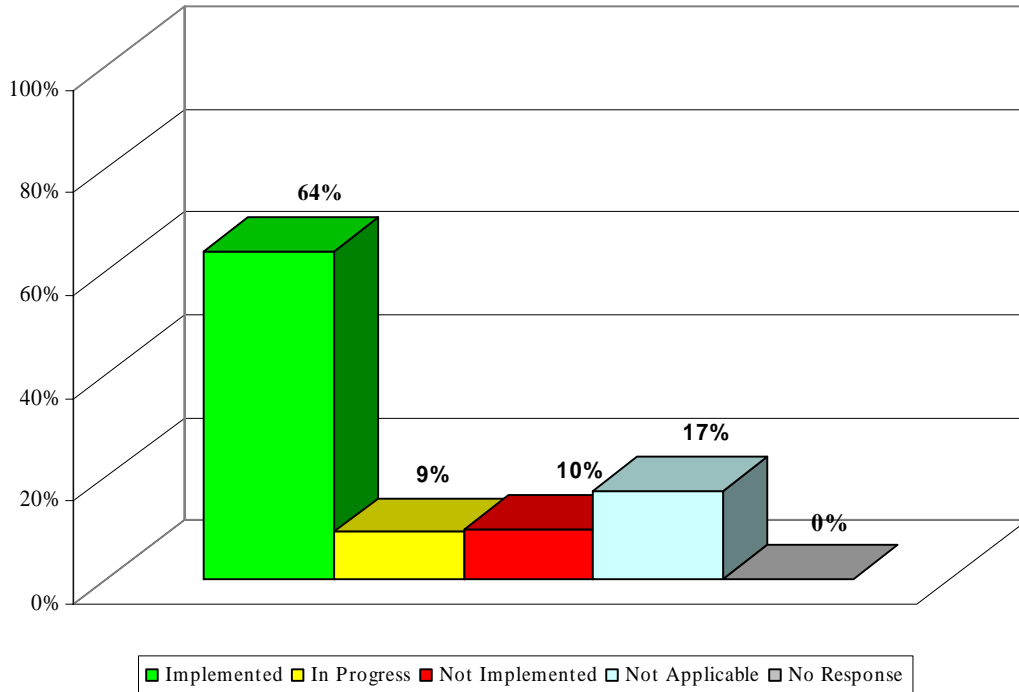


Figure 27: Germany - Standards Overview

### Category Overview

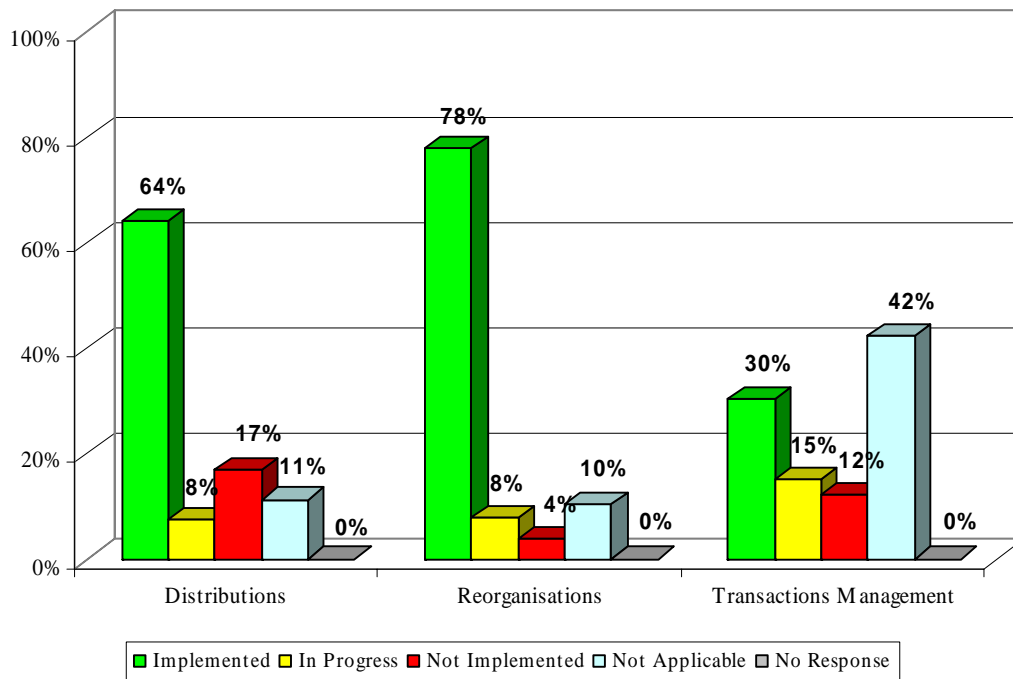
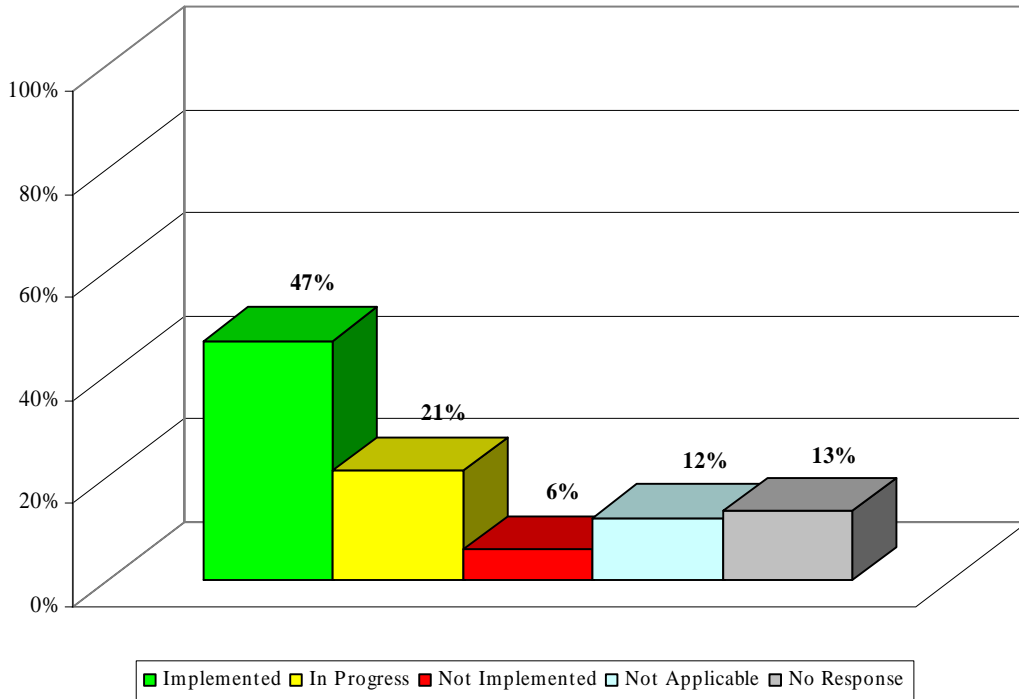


Figure 28: Germany - Category Overview

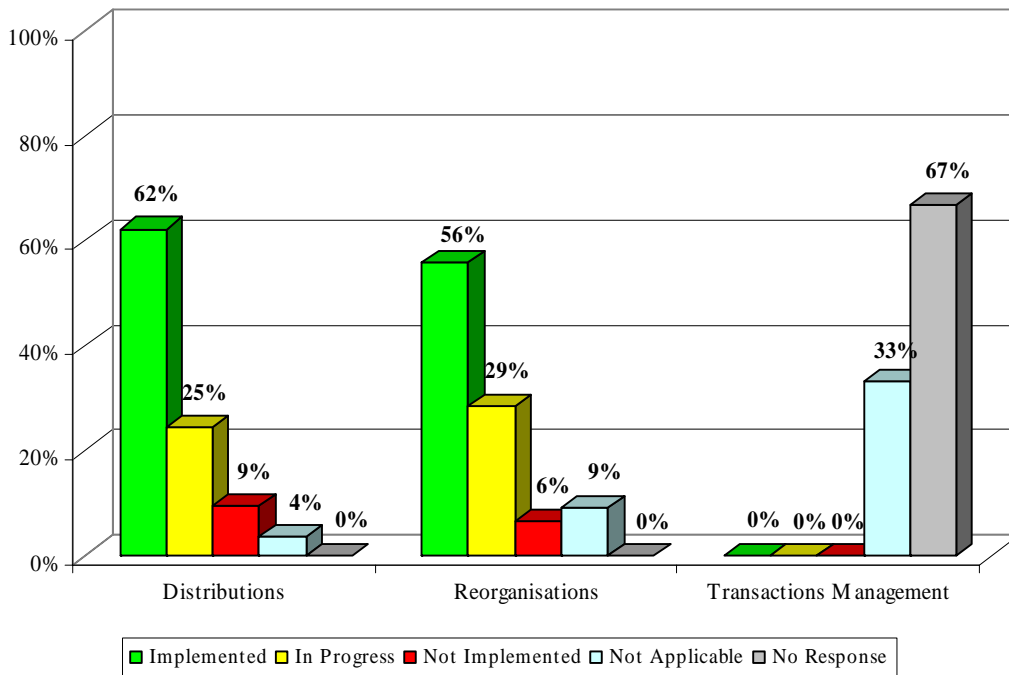
**Greece**

**Standards Overview**



**Figure 29: Greece - Standards Overview**

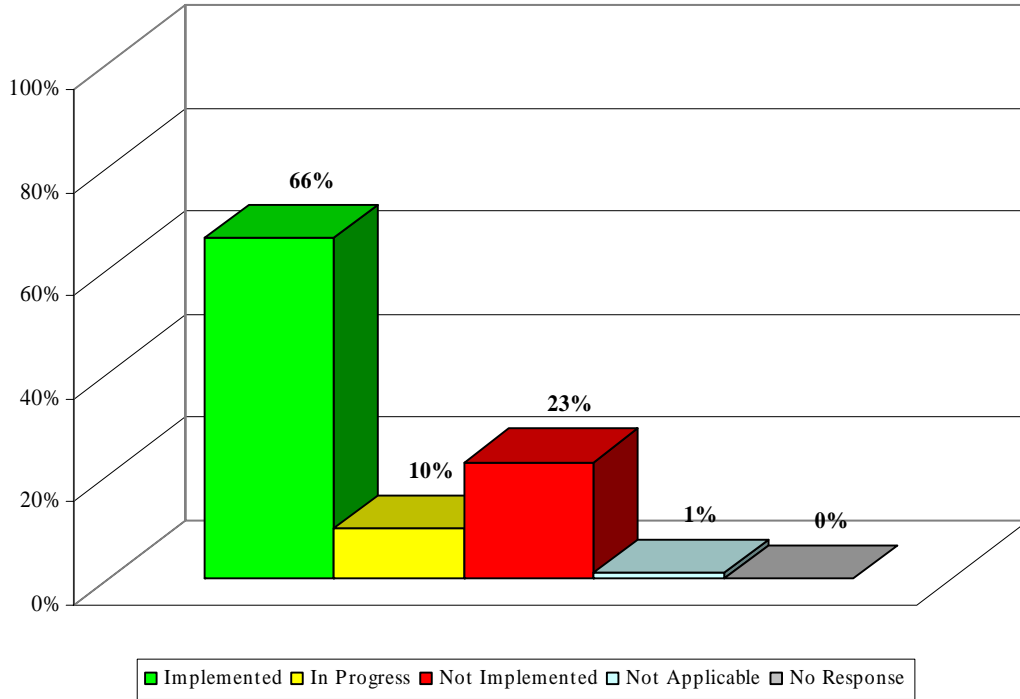
**Category Overview**



**Figure 30: Greece - Category Overview**

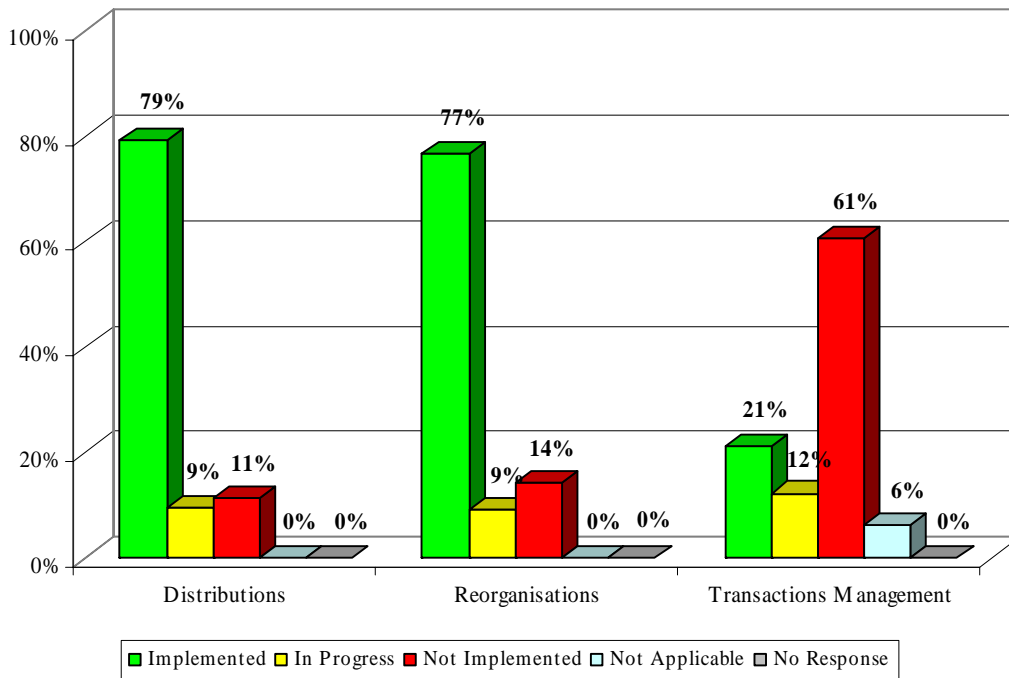
**Italy**

**Standards Overview**



**Figure 31: Italy - Standards Overview**

**Category Overview**

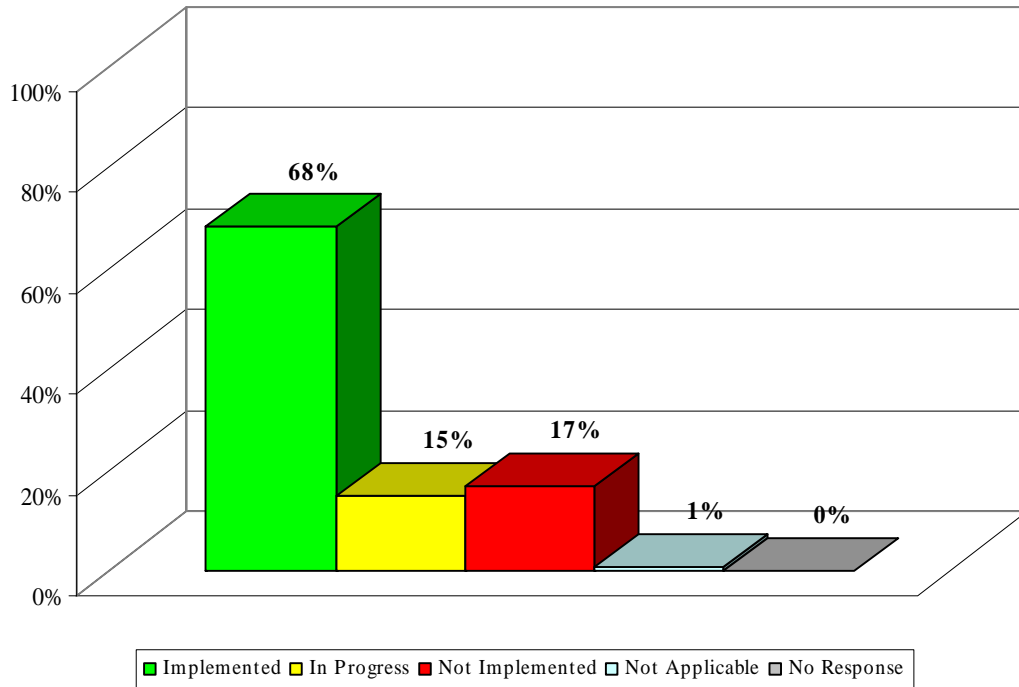


**Figure 32: Italy - Category Overview**



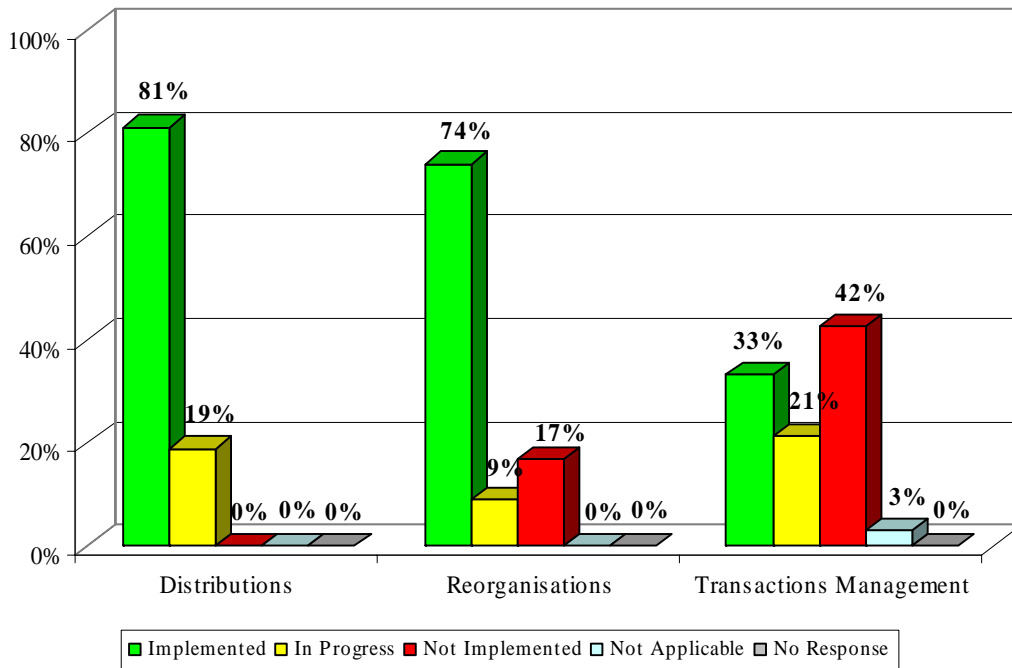
**The Netherlands**

**Standards Overview**



**Figure 33:** Netherlands - Standards Overview

**Category Overview**



**Figure 34:** Netherlands - Category Overview

## Portugal

### Standards Overview

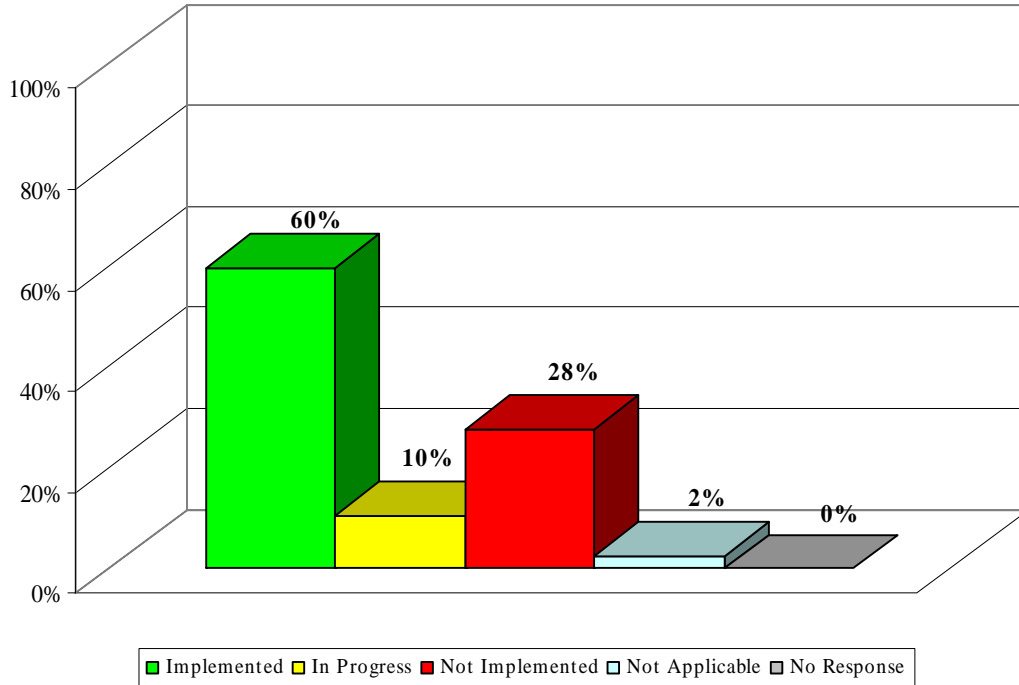


Figure 35: Portugal - Standards Overview

### Category Overview

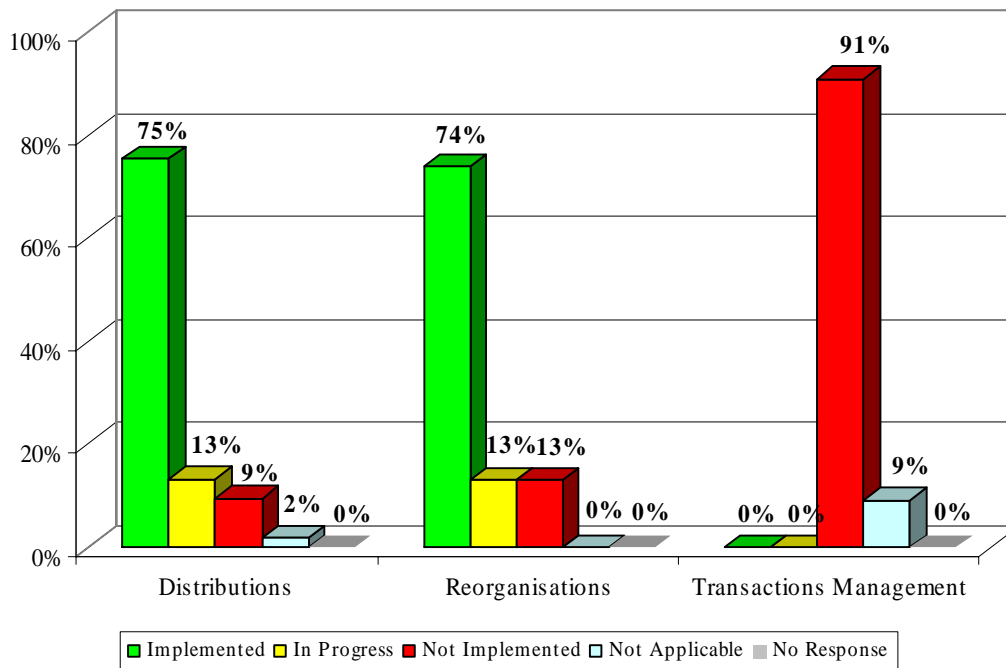
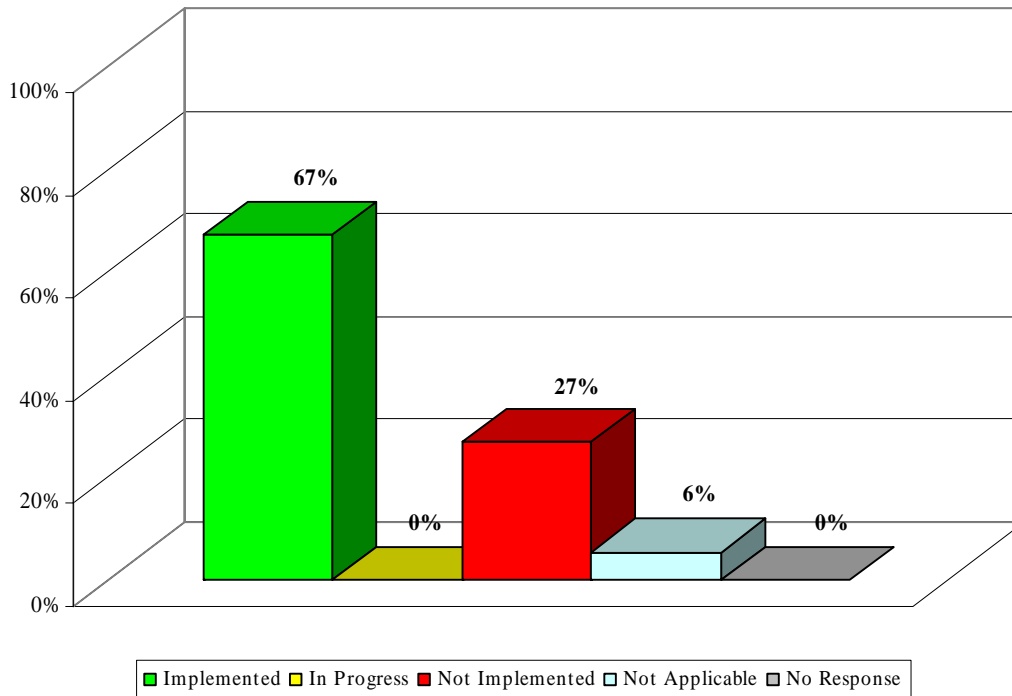


Figure 36: Portugal - Category Overview

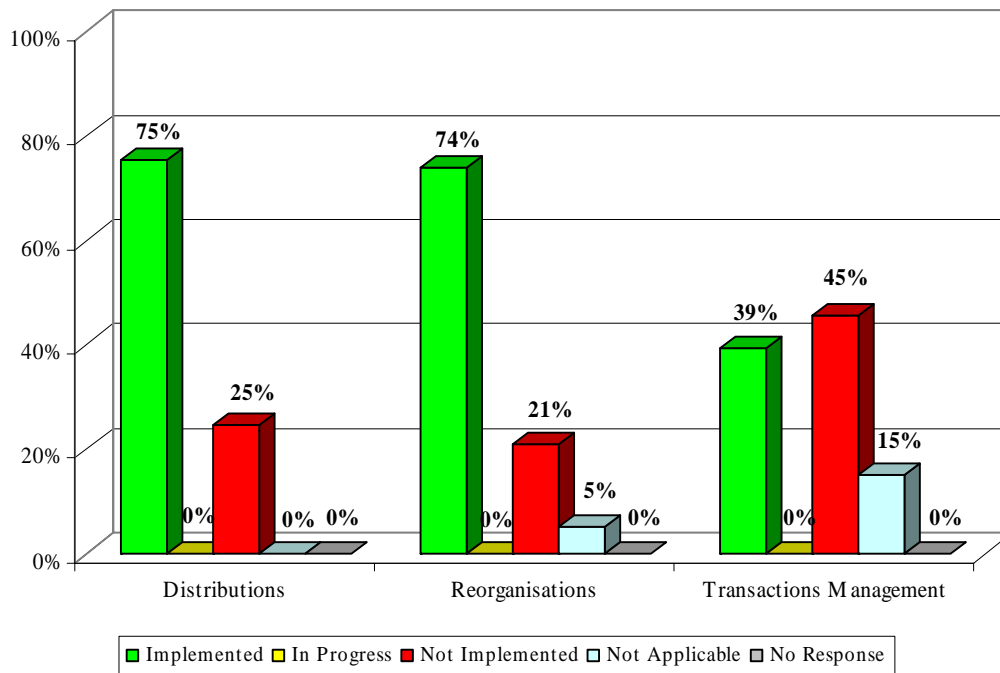
**Spain**

**Standards Overview**



**Figure 37: Spain - Standards Overview**

**Category Overview**



**Figure 38: Spain - Category Overview**

## Sweden

### Standards Overview

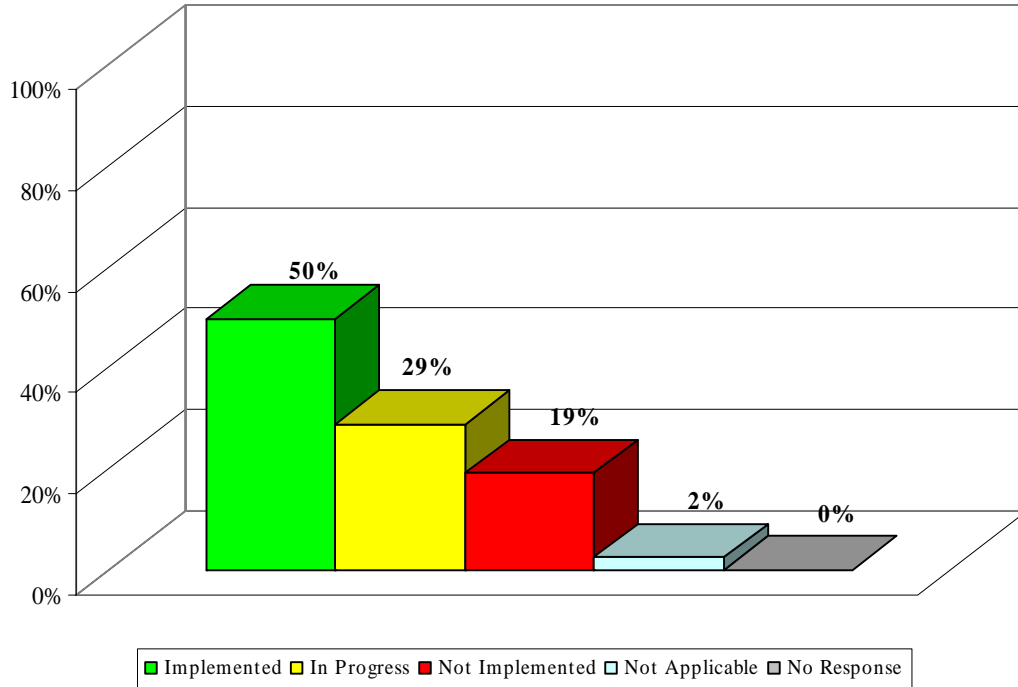


Figure 39: Sweden - Standards Overview

### Category Overview

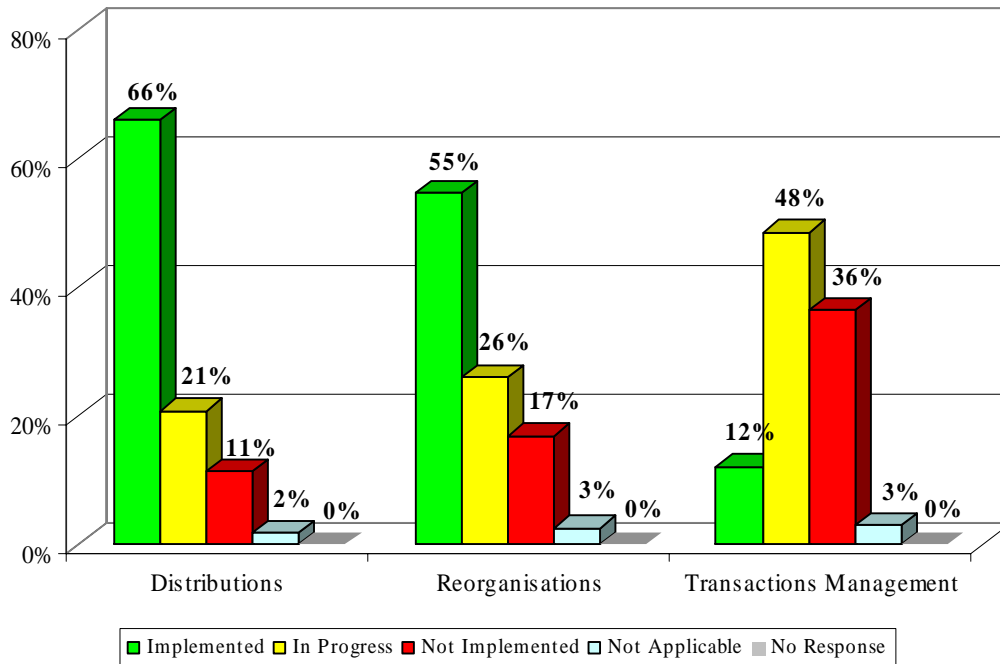
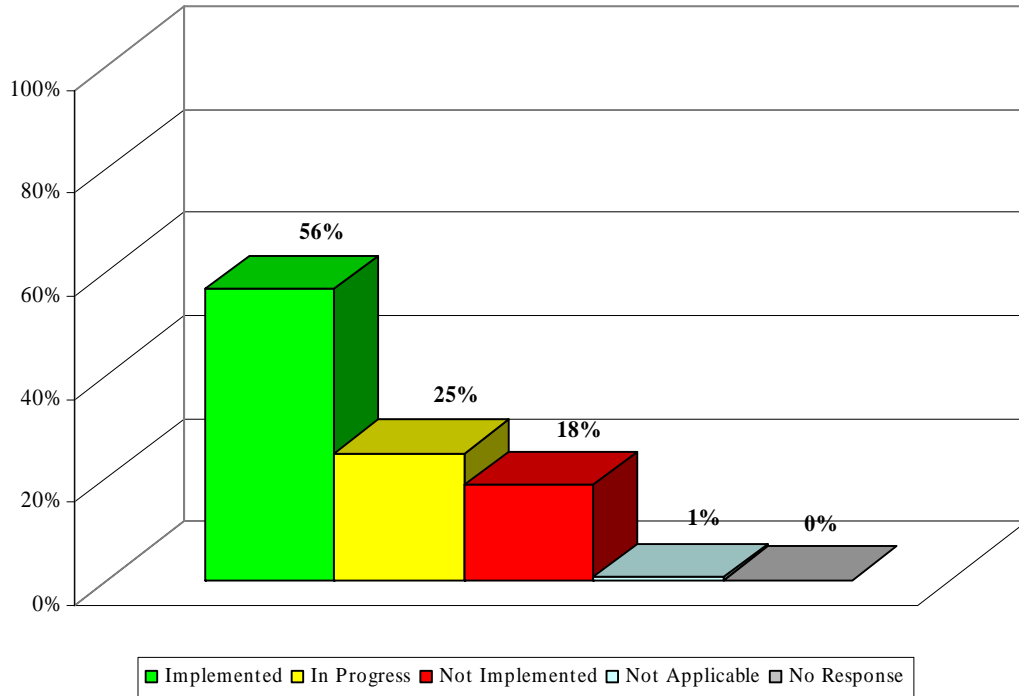


Figure 40: Sweden - Category Overview

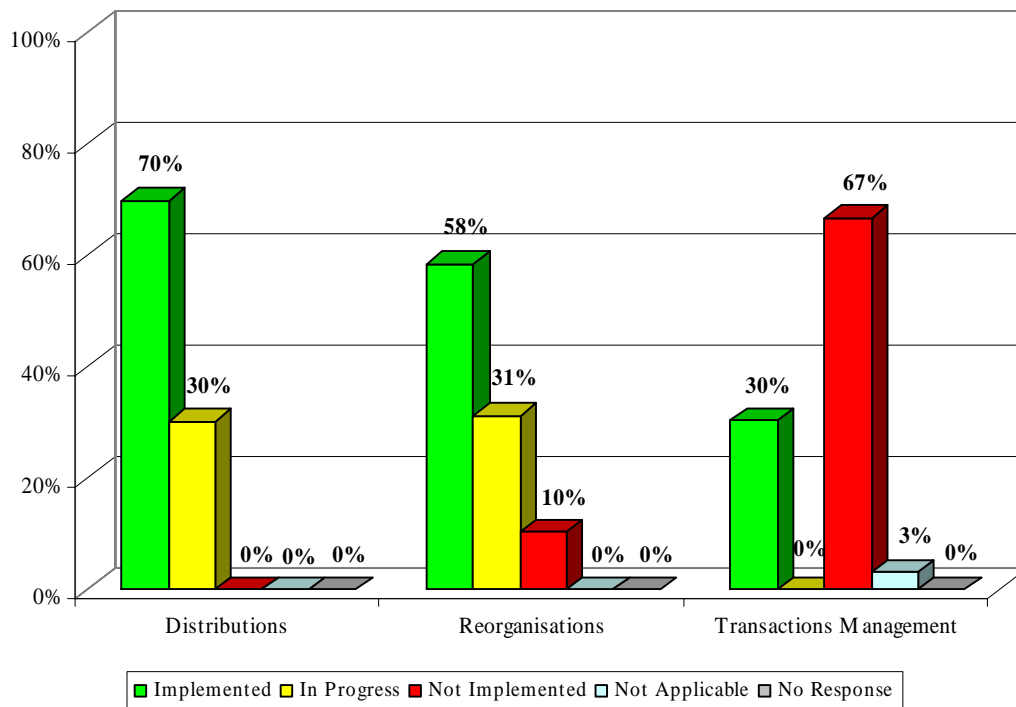
**Switzerland**

**Standards Overview**



**Figure 41:** Switzerland - Standards Overview

**Category Overview**



**Figure 42:** Switzerland - Category Overview

## United Kingdom

### Standards Overview

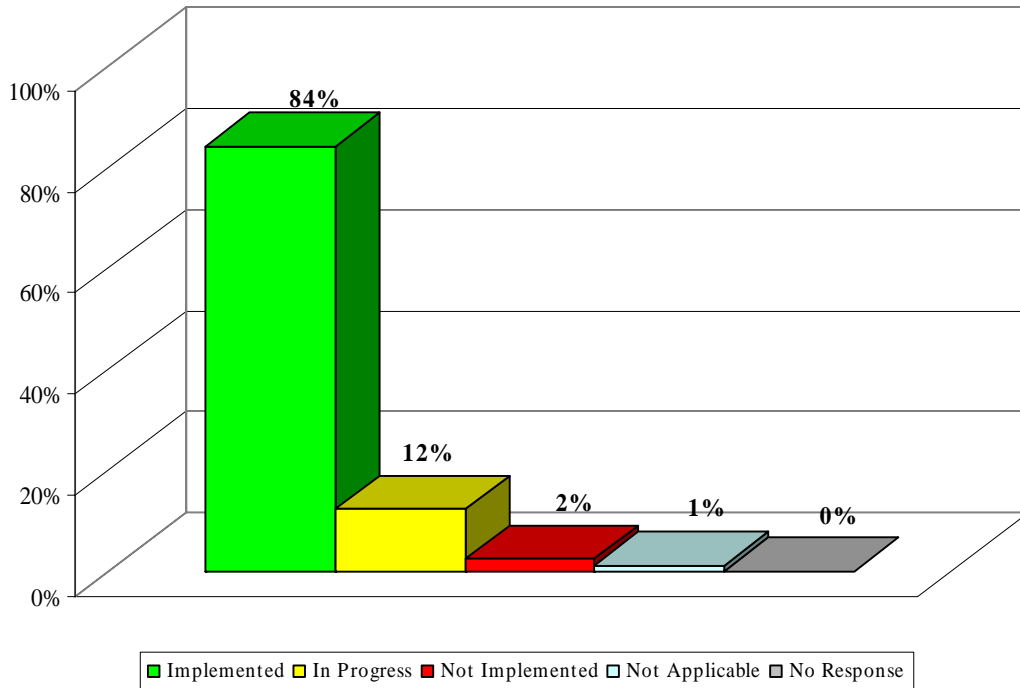


Figure 43: United Kingdom - Standards Overview

### Category Overview

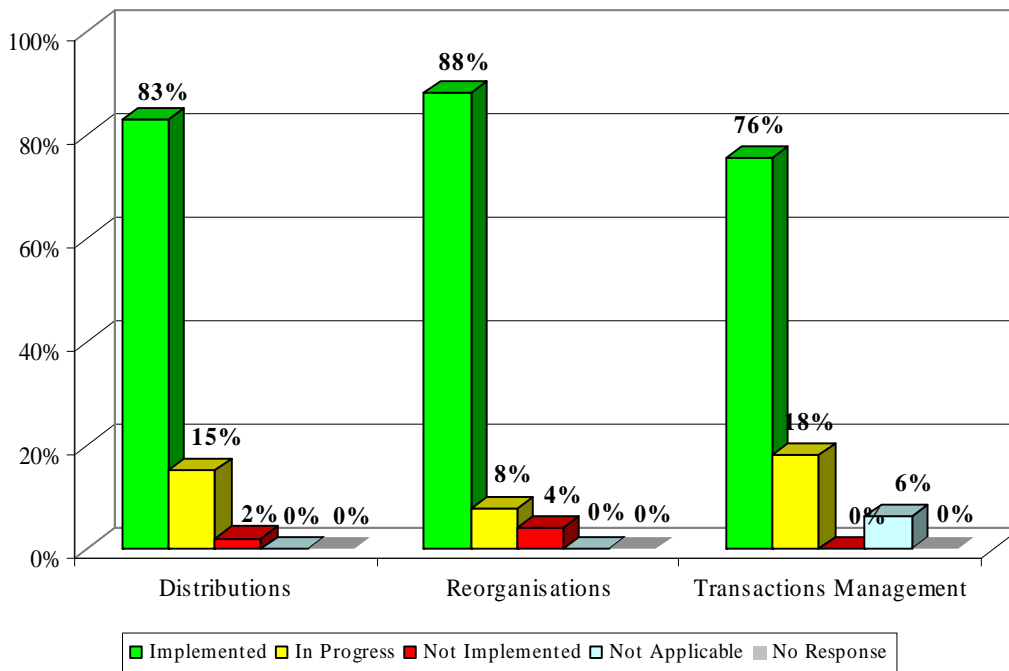


Figure 44: United Kingdom - Category Overview

## Annex 3: Country supplements

### Belgium

#### *BEMIG General Remarks*

1. Belgium has 2 CSDs : Euroclear Belgium (EBE) for securities, and NBB (Belgian National Bank) for bonds. They participate to the BEMIG.
2. LCH-Clearnet is also part of the BEMIG and has given its input for BE markets.
3. Belgian listed issuers are also represented within the BEMIG.
4. The reference to the Single Platform Custody (SPC) or to the Single Platform Transactions Management (SPTM) is considered by BEMIG as milestones, respectively Q4 2010 and Q3 2011, and is not mainly dependent of the technical aspect of the platform.
5. In the current environment (ESES), harmonisation with FR and NL markets will be needed ( Buyer protection e.g.)
6. When possible, responses are done at the level of the Belgian Market. If needed, they are segmented by market infrastructure (EBE, LCH-Clnt, NBB).

#### *Summary by market infrastructure*

### **EUROCLEAR BELGIUM (EBE)**

<b>DISTRIBUTIONS</b>	<b>REORGANISATIONS</b>	<b>TRANSACTIONS MANAGEMENT</b>
Red 1 (Cash D. 20c ; Sec D. 17c) <i>current market deadline is 14H00/15H00</i> <i>standards recommend 12H00</i> <i>==&gt; Market practices</i>	Red 1 (MR 17c)(VR 22c) <i>current market deadline is 14H00/15H00</i> <i>standards recommend 12H00</i> <i>==&gt; Market practices</i>	Red 1 (MC 2, 3, 6) <i>.==&gt; OK with SPTM implementation</i>
Red 2 (Sec D. 16C) <i>Rounding down</i> <i>==&gt; To be discussed with issuers</i>	Red 2 (MRwO 23b) (MR 18b) <i>Rounding down</i> <i>==&gt; To be discussed with issuers</i>	Red 2 (T3) <i>No</i>
Orange 1 (Cash D. 3, 5, 6) (Sec D. 4, 5, ) <i>.==&gt; OK with SPC implementation</i>	Orange 1 (MRwO 4, 5) (MR 4, 5, ) (VR 4,5, 20) <i>.==&gt; OK with SPC implementation</i>	Orange 1 (T1) <i>No transformation based on Buyer Protection</i>
Orange 2 (Cash D. 9) (Sec D. 8) <i>retail OK, wholesale not ok for pending</i> <i>and new transactions depending on the intermediary.</i> <i>==&gt; Market practices</i>	Orange 2 (MRwO 8) (MR 8)(VR 8) <i>retail OK, wholesale not ok for pending</i> <i>and new transactions depending on the intermediary.</i> <i>==&gt; Market practices</i>	Orange 2 (T11) <i>reporting in ISO, currently in ESES optional,</i> <i>==&gt; OK with SPTM implementation</i>
Orange 3 (Cash D. 19)	Orange 3 (MRwO 12)	

*Direct payment ==> OK  
November 2009*

*Orange 4 (DwO 2)*

*processed as two separate CA  
==> To be discussed with issuers,  
==> Market practices*

*Start of Election period min 10 Days,  
Not OK for price sensitive events,  
==> To be discussed with issuers  
Orange 4 (MRwO 19)  
electronic communication,  
not always possible for pendings  
(physicals to be demat) ==> Wait end  
physicals (2013)  
Orange 5 (MRwO 20)  
underlying securities  
==> To be discussed with issuers,  
==> Market practices*

*Buyer protection : OK in essence*

## NATIONAL BANK OF BELGIUM (NBB)

### DISTRIBUTIONS

*Red 1 (Cash D. 20c)  
Recommended deadline for  
payment in cash.NBB is  
considering moving to 10H00, by  
market consultation.*

### REORGANISATIONS

### TRANSACTIONS MANAGEMENT

*Red 1 (market claims)  
To be implemented with T2S*

*Red 2 (transformations)  
To be implemented with T2S  
Red 3 (buyer protection)  
To be implemented with T2S*

## LCH-Clearnet

### DISTRIBUTIONS

### REORGANISATIONS

### TRANSACTIONS MANAGEMENT

*Market claims : not compliant with  
St 2, 6, 9  
due to the business model.  
Transformations : non compliant  
with St 8 and 11  
due to the business model.  
Buyer protection : OK in essence*

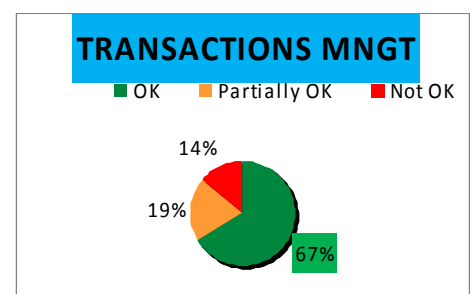
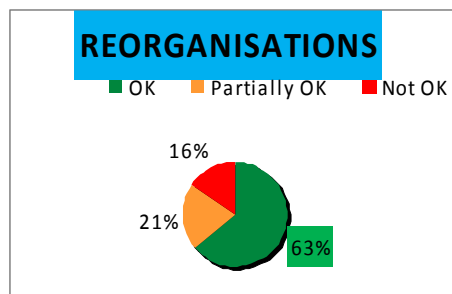
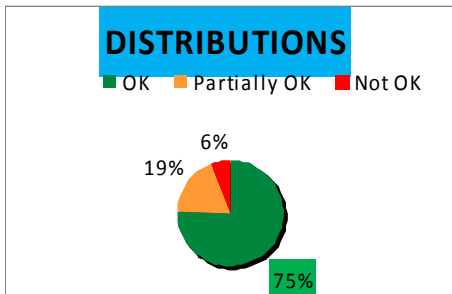
*To be discussed with issuers*

<i>Cash distributions</i>	<i>Information from Issuer to Issuer (I)CSD</i>	<i>St. 1, 2, 3, 4, 13, 14.</i>
<i>Securities distributions</i>	<i>Information from Issuer to Issuer (I)CSD</i>	<i>St. 1, 2, 3, 12, 16,</i>
<i>Distributions with options</i>	<i>Reference price for fractions Information from Issuer to Issuer (I)CSD</i>	<i>St. 1, 2, 3, 5, 6</i>
<i>Mandatory Reorganisations with Options</i>	<i>Information from Issuer to Issuer (I)CSD</i>	<i>St. 1, 11, 12, 20, 23.</i>
<i>Mandatory Reorganisations</i>	<i>Information from Issuer to Issuer (I)CSD</i>	<i>St. 1, 2, 3, 11, 13, 16, 18.</i>
<i>Voluntary reorganisations</i>	<i>Information from Issuer to Issuer (I)CSD</i>	<i>St. 1, 2, 3, 11, 12, 13, 14, 15, 16,19, 23.</i>
	<i>Buyer protection, Guaranteed participation date</i>	

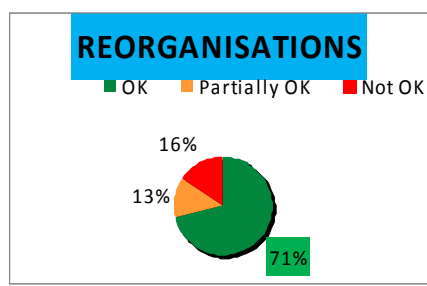
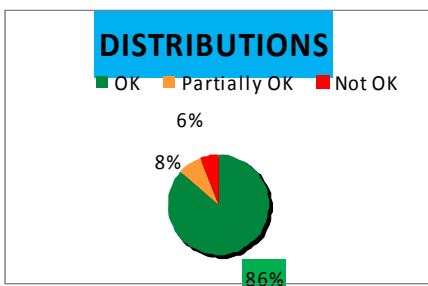
*Statistics*



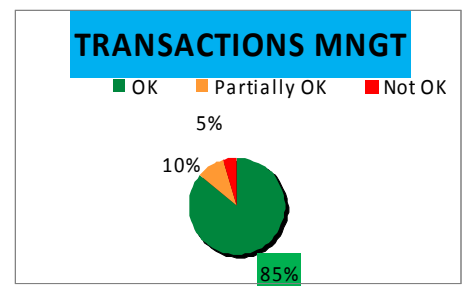
### Today



### After SPC



### After STPM



## France

Major forecasted système enhancements have been taken in account in order to consider them as milestones for a whole market step.

Three major milestones have been highlighted:

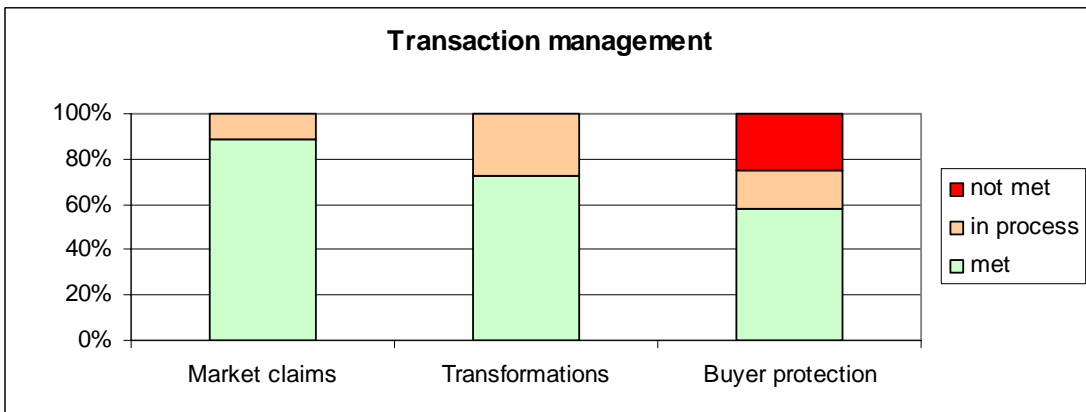
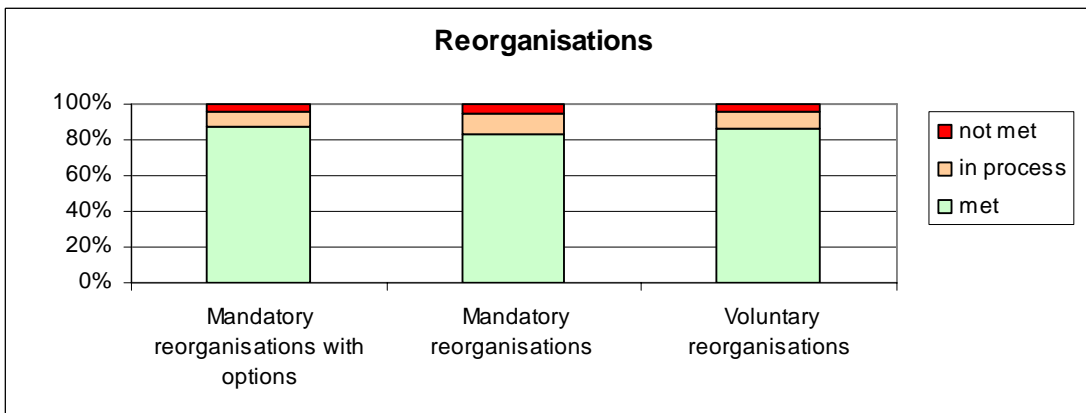
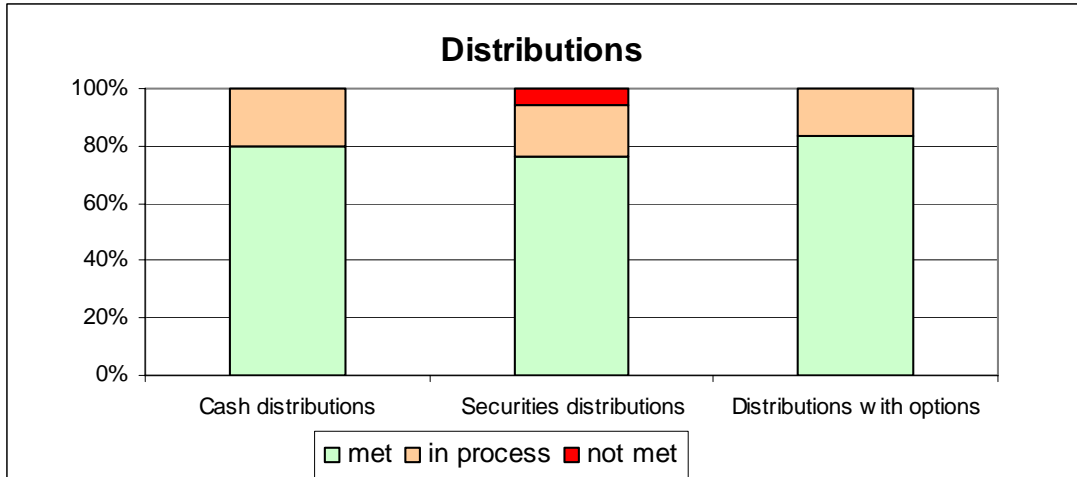
- End of 2010 beginning of 2011, this milestone corresponds to SP Custody (ESES EUI) delivery (currently forecasted for end of 2010) and has been named "SP Custody". Please note that in different cases, the local enhancement is not necessary dependent on the SP Delivery but it makes sense to economically focus lots on a common milestone.
- 2011, this milestone corresponds to SP Transaction Management delivery and has been named "SPTM" (same comment for SPTM than above for SPC).
- 2013, this milestone is this of Target 2 Securities. It is considered as a deadline (same comment for T2S than above for SPC).

## Netherlands

Sometimes "In Progress" is used to indicate that most but not all issuers do meet the standard for some reason. In such cases, DuMIG advocates and stimulates that deviations from the standards are explicitly explained.

## United Kingdom

	<u>% met</u>	<u>% in process of being met</u>	<u>% not met</u>	<u>Total % of met and in process of being met</u>	<u>Number of standards</u>	<u>Number met</u>	<u>Number in process of being met</u>	<u>Number not met</u>
<u>Distributions</u>								
Cash distributions	80.00%	20.00%	0.00%	100.00%	20	16	4	0
Securities distributions	76.47%	17.65%	5.88%	94.12%	17	13	3	1
Distributions with options	83.33%	16.67%	0.00%	100.00%	6	5	1	0
<u>Reorganisations</u>								
Mandatory reorganisations with options	86.96%	8.70%	4.35%	95.65%	23	20	2	1
Mandatory reorganisations	83.33%	11.11%	5.56%	94.44%	18	15	2	1
Voluntary reorganisations	86.96%	10.00%	4.35%	96.96%	23	20	2	1
<u>Transaction Management</u>								
Market claims	88.89%	11.11%	0.00%	100.00%	9	8	1	0
Transformations	72.73%	27.27%	0.00%	100.00%	11	8	3	0
Buyer protection	58.33%	16.67%	25.00%	75.00%	12	7	2	3



## **Annex 4: ECSA contacts**

- Set up in 1960, the **European Banking Federation (EBF)** is the voice of the European banking sector, with over € 30,000 billion assets (3.00% of EU's GDP) and 2.4 million employees (1.5% of EU's employed work force) in 31 EU and EFTA countries. The EBF represents the interests of some 5,000 European banks: large and small, wholesale and retail, local and cross-border financial institutions, and works toward positioning the European banking industry within the European and global regulatory frameworks (<http://www.fbe.be>).

Contact: Mr. Robert PRIESTER, [R.Priester@ebf-fbe.eu](mailto:R.Priester@ebf-fbe.eu)

- The **European Savings Banks Group (ESBG)** represents one of the largest European retail banking networks, comprising about one third of the retail banking market in Europe, with total assets of € 5,215 billion (1 January 2006). ESBG members are typically savings and retail banks or associations thereof. They are often organized in decentralized networks and offer their services throughout their region. ESBG member banks have reinvested responsibly in their region for many decades and are one distinct benchmark for corporate social responsibility activities throughout Europe and the world (<http://www.savings-banks.com>).

Contact: Mr. Norbert BIELEFELD, [norbert.bielefeld@savings-banks.com](mailto:norbert.bielefeld@savings-banks.com)  
Ms. Jamie NOLTE, [Jamie.Nolte@savings-banks.com](mailto:Jamie.Nolte@savings-banks.com)

- The **European Association of Co-operative Banks (EACB)** is the voice of the co-operative banks in Europe. It represents, promotes and defends the common interests of its 28 member institutions and of co-operative banks in general. With 4.200 locally operating banks and 63.000 outlets co-operative banks are widely represented throughout the enlarged European Union, playing a major role in the financial and economic system. They have a long tradition in serving 160 million customers, mainly consumers, retailers and communities. The co-operative banks in Europe represent 50 million members, 750.000 employees and have a total average market share of 20% (<http://www.eurocoopbanks.coop>).

Contact: Ms. Marieke VAN BERKEL, [m.vanberkel@eurocoopbanks.coop](mailto:m.vanberkel@eurocoopbanks.coop)  
Mr. Alessandro SCHWARZ, [a.schwarz@eurocoopbanks.coop](mailto:a.schwarz@eurocoopbanks.coop)

