

SCoREBOARD

Corporate Actions – H2 2024

French NSG

Background

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

What is SCoRE?

SCoRE defines common rules for managing collateral in Europe. These rules will replace the fragmented legacy standards, structural constraints and complex and diverse market practices that exist across Europe today. Implementation of SCoRE should remove operational impediments to the availability, usage and mobility of collateral. Market participants in AMI-SeCo have committed to implementing the SCoRE Rulebook, with the first set of rules due to be implemented by November 2024. Their implementation efforts are regularly monitored by AMI-SeCo which facilitates an active dialogue with market participants on issues related to the clearing and settlement of securities and to collateral management.

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

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

Introduction

This summary report presents the results of the H2 2024 monitoring exercise conducted by the French NSG with the involvement among the following stakeholders:

12 entities are monitored in the French market.

- 1 CSD – Euroclear France
- 2 TPAs – Euroclear France, BNP Paribas
- 8 Custodians
- 1 Issuer – the French Debt Management Office (Agence France Trésor)

In this monitoring exercise, participants were expected to have achieved all the milestones up to Milestone 11 inclusive “Final external communication on SCoRE” (with a deadline of 22 May 2023) as described in section 3 below. The findings of the monitoring exercise reflect the Milestones roadmap in place by the time the survey closed (i.e., 13 September 2024) and do not yet consider the AMI-SeCo reflections on the rescheduling of the existing SCoRE Standards implementation deadline from 18 November 2024 to 16 June 2025.

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

1 Key takeaways

Implementation of Corporate Action Standards is on track for one CSD and TPA (while the business of the other TPA does not involve interactions with the Eurosystem / ECMS). However, 50% of the custodians still expect to experience some delays for the full implementation of the standards.

The French CSD and TPA Euroclear France responded to the Corporate Actions survey on time. Its implementation status is satisfactory and timely. BNP Paribas triparty service is limited (no interaction with NCBs / ECMS for monetary policy operations) and so far this TPA has only started the relevant analysis needed to adopt the corporate actions standards applicable to triparty agents. Nonetheless, BNP Paribas is planning to adopt them by December 2025, thus with a 13-month delay compared to the November 2024 deadline (CA standards 2-15, based on BNP Paribas Custodian roadmap). Regarding custodians, their participation rate (50%) has increased with respect to the H1 2024 and decreased compared to the H2 2022 exercise (when it stood at 63%). However, those who responded to the survey did not report difficulties, which reflects a better knowledge of the SCoRE harmonisation project at the operational level. The French issuer (Agence France Trésor) took part to this monitoring round and confirmed the answers provided in the previous survey; this is related to the absence of relevant implementation changes for this actor. Given the improvement in the French custodians’ participation rate, the French NSG plans to reinforce its communication towards these actors in order to support timely implementation of the standards. To this end, in September 2024, French issuers / agents received a letter underlying the importance for them of using business

processes and workflows that are compliant with the AMI-SeCo SCoRE Standards (and in particular with the Standards 1F, 1G and 1H on Corporate Actions). The French NSG invited them to provide an action plan by 1st October 2024 to reach a path towards full conformity and forwarded this detailed action plan to the ECB at the end of 2024.

This section presents the key findings of the survey for each entity type.

Figure 1
Summary of the monitoring exercise ¹

 <small>SCORE</small> <small>REGULATORY MONITORING BOARD</small>	 Response Rate	 Implementation Status of the standards	Are all milestones 1 to 11 inclusive achieved?	Will the last milestone 13 be implemented on time (i.e. by 18 November 2024)?
Custodians	50%	Implemented 36.35% Implementation started 1.92% Analysis started 3.78% Analysis not started 0.77% Replies not submitted 57.18% ----- Non applicable standards 12.56%	Average % of milestones achieved 43%	% of custodians on time 50%
Issuers	100%	Aware of obligations 63.64% Not aware of obligations 36.36% Replies not submitted 0%	NA (milestones irrelevant for issuers)	NA
CSD - Euroclear France	Survey submitted	Implemented 64.86% Implementation started 31.53% Analysis started 3.6% Analysis not started 0% ----- Non applicable standards 4.72%	Yes	Yes
TPA - BNP Paribas	Survey submitted	Implemented 1.29% Implementation started 0% Analysis started 2.15% Analysis not started 0% ----- Non applicable standards 0%	No	12/25
TPA - Euroclear France	Survey submitted	Implemented 62.5% Implementation started 0% Analysis started 37.5% Analysis not started 0% ----- Non applicable standards 0%	Yes	Yes

¹ Green: on track; Yellow: slight delay; Red: area of attention

CSD - Euroclear France

Euroclear France's implementation is well on schedule: the CSD plans to meet all future milestones on time and has already implemented more than half of all CA standards.

Euroclear France has fully completed the monitoring survey in a timely manner. It has already implemented 64.86% of the Corporate Actions sub points of standards (i.e. at the granular level), and has started implementation for 31.53% of them. The analysis has started for the remaining sub points of standards (3.6 %), with the exception of those deemed non-applicable (accounting for 4.7% of the total number of sub points), because the CSD does not process related messages / notifications. Hence, implementation is largely on track and expected to reach full compliance by the November 2024 deadline.

More in detail, out of the 34 sets of Corporate Actions sub standards gathered in the SCoREBOARD below (Table 1), 17 have already been fully implemented (blue) and 12 are on schedule for implementation (green). 5 remaining standards are behind schedule and should be adopted during next steps. This corresponds to a significant improvement compared to H1 2023, when 14 sets of standards were already fully implemented, 8 were on schedule for implementation and the 12 remaining standards were marked as being behind schedule. In its April 2021 Adaptation Plan, Euroclear France had indicated that the ESES CSDs had jointly started several initiatives to gradually migrate corporate actions services to a new assets servicing platform. Part of those projects have already been delivered, thus improving the overall adoption rate; the remaining phases are scheduled for the coming years.

As a result, overall there is no issue of concern for Euroclear France as a CSD, whose implementation of the Corporate Actions standards appears well on track; the CSD has met milestone 11 ("Final external communication on SCoRE") on time and plans to meet all the future ones in due time (see Table 2).

TPA - Euroclear France

As a TPA, Euroclear France has implemented most of the applicable Corporate Actions standards (62.5%) and started the analysis for the remaining 37.5%.

As a TPA, Euroclear France has already implemented most of the Corporate Actions standards applicable to TPAs and has started the analysis for the remaining 37.5%. Overall, implementation is largely on track and the TPA is expected to reach full compliance by the November 2024 deadline.

TPA - BNP Paribas

BNP Paribas triparty service is for now not related to monetary policy operations / ECMS.

BNP Paribas triparty activity is for now reduced to a tight perimeter: no triparty service is offered for monetary policy operations. This is the reason why BNP Paribas had reported in previous surveys that the Corporate Actions standards were "non-applicable" to its services. However, based on ECB's clarifications, the standards do apply to TPAs regardless of whether they are Eurosystem-eligible or not. BNP Paribas is thus expected to implement them. In this respect, the implementation status is currently mostly marked as yellow – analysis ongoing (except for standards 1F, G, H which are already implemented by the TPA). According to the milestones, BNP will be able to implement the standards by December 2025, with a 13-month delay. A detailed analysis is in progress for CA milestones 3 and 4 and 7 to 13.

Custodians

Corporate Actions standards implementation has increased compared to the previous monitoring (H1 2024). The participation rate reached exactly 50% for the H2 2024 monitoring. Overall, some sets of standards such as those related to ISO 20022 messaging show a low level of compliance, and the level of conformity is still heterogeneous among participants (50% of them expecting a delay as regard the final deadline).

The response rate among custodians (50 %) has increased with respect to the H1 2024 (when it stood at 38 %). Overall, the respondents have already implemented 36.35% of the Corporate Actions standards (considering every standard at granular level) and started the implementation for a mere 1.92% (and started the analysis for 3.78 %). This is a good improvement compared to the previous monitoring, when the respondents had already implemented only 23.7% of the Corporate Actions standards.

Out of the 24 sets of Corporate Actions sub standards applicable to custodians (see Table 1 below), the adoption rate is above 40% for 21 of them and above 20% for 3 of them (this adoption rate meaning that implementation for the standards is on track). The implementation rate of the ISO 20022 messaging standards remains low (23 %). This might be due to the fact that custodians do not have, for now, a strong incentive to adopt the new ISO messaging standard, as its usage in the Eurosystem will be compulsory before 2025 only for entities interacting with the ECMS (CSDs, TPAs, NCBs). Hence, in the absence of strong commercial incentives, custodians seem for now reluctant to prioritise the adoption of this norm. Besides this standard, which remains the main difficulty for a significant part of French custodians, overall, the survey reveals a heterogeneous level of conformity on the path toward the adoption of CA standards, with 50% of respondents expecting to implement the CA standards before the final deadline.

In total, 43% of the custodians have reached the 11 milestones to-date and are thus fully on track as of H2 2024 (an improvement compared to the H1 2024 monitoring where this figure stood at 28%). Also, 50% of custodians expect a delay for the adoption of all Corporate Actions by the deadline of the ECMS go-live. These results underline the need for NSG members to continue to focus on the implementation phase in order to meet SCoRE deadlines.

Issuers

Agence France Trésor (AFT), the public debt management office, is the sole issuer in the French market included in the survey. The AFT is perfectly aware of its obligations regarding the SCoRE standards.

The French NSG Secretariat engaged with the only issuer of the NSG, the public debt management office - Agence France Trésor (AFT), which participated to the H2 2024 survey. The AFT resorts to the ESES CSDs for its issuances and corporate actions, and uses the “user-end” platform of Euroclear, via the ESES interface. Corporate actions of assets issued by the AFT are predetermined and limited (only coupons payments and redemptions), and are conducted through dedicated templates (for the communication between the AFT and ESES). These templates have been updated recently by Euroclear, in order to ensure that the ESES CSDs receive all the necessary information related to corporate actions, in compliance with the SCoRE standards. The AFT is well aware of the standards, and of the importance to communicate timely the necessary information to the ESES CSDs, so that the latter can comply with the SCoRE requirements. Of note, some of the obligations are not related to the AFT perimeter / business (debt issuance only) and are thus reported as “n/a” by this agent. All in all, there is no specific issue of concern for the AFT.

Banque de France is on track to adopt the SCoRE Standards by November 2024.

NCB

Banque de France is on track to implement the SCoRE standards for Corporate Actions for its collateral management activities by November 2024.

2 Compliance level with the standards

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

Figure 2

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



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

Table 1

Compliance level with the standards by each entity type

STANDARD	Custodians	Issuers	CSD - Euroclear France	TPA - BNP Paribas	TPA - Euroclear France
1A: Notification	47%	100%	G	Y	B
1B: Instruction	45%		G	Y	B
1C: Advise	43%		G	Y	B
1D: Confirmation	42%		G	Y	B
1E: Reversal	43%		G	Y	B
1F: Meeting Notification	43%	100%	Y	B	Y
1G: Meeting Instruction	40%		Y	B	Y
1H: Meeting Results	29%		Y	B	Y
2: Calculation of Proceeds	42%	100%	G		
3: Consistency of Information	41%	100%	G		
4: Rounding Rule 1	43%	100%	B		
4: Rounding Rule 2	43%	100%	B		
4: Rounding Rule 3	43%	100%	B		
4: Rounding Rule 4	43%	100%	B		
4: Rounding Rule 5	43%	100%	B		
5: Negative Cash Flows	43%	0%	B		
6: Business Day Rule		0%	B		
7: Securities Amount Data Rule 1		100%	G		
7: Securities Amount Data Rule 2		0%	B		
7: Securities Amount Data Rule 3		0%	B		
7: Securities Amount Data Rule 4		0%	B		
8: Payment Time Rule 1		0%	G		
8: Payment Time Rule 2		0%	G		
8: Payment Time Rule 3		0%	G		
8: Payment Time General Principle 3		0%	G		
9: Processing Status	43%	100%	B		
10: Rule 1	43%		B		
10: Rule 2	43%		B		
10: Rule 3	43%		B		
11: Default Option	43%	0%	B		
12: Handling of Fees	43%		Y		
13: Reversal	33%	100%	B		
14: Foreign Currency			B		
15: ISO 20022 Messaging	23%		Y		

Notes:

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

3 Progress towards the milestones

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

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

Table 2
Milestones identified by AMI-SeCo

Milestone	Description	Date
M1	Analysis Started: Have you commenced an in-depth analysis of all applicable SCoRE Standards in order to identify and document all the changes required to internal processes and procedures in order to comply with the SCoRE Standards?	30/06/2020
M2	Initial Communication: Has initial high-level communication with external stakeholders on the changes introduced by SCoRE commenced?	01/03/2021
M3	Analysis Completed: Have you completed an in-depth analysis of all applicable SCoRE Standards?	31/07/2021
M4	Documentation Completed: Have you documented all the internal processes and procedures which need to be adapted in order to comply with the SCoRE Standards?	31/12/2021
M5	Detailed External Communication: Has detailed communication started regarding (i) upcoming changes in business processes, (ii) messaging formats and usage guidelines (in the case of new messages based on non-registered latest drafts by SWIFT) and (iii) planned testing activities been provided to users?	31/12/2021
M6	SCoRE Adaptation Started: Have you started to adapt/develop the processes and procedures in order to comply with the SCoRE Standards?	01/01/2022
M7	SCoRE Adaptation Complete: Have you completed the necessary adaptations/developments for the processes and procedures in order to comply with the SCoRE Standards?	30/06/2022
M8	Internal Testing Started for SCoRE: Have you started to test the changes to your internal processes and procedures which have been introduced in order to comply with the SCoRE Standards?	01/07/2022
M9	Internal Testing Complete for SCoRE: Have you completed the necessary internal testing?	10/03/2023
M10	External Testing Started for SCoRE: Are you in a position to test the changes introduced in order to comply with the SCoRE Standards with your user community (i.e. CSD participants / Collateral Givers and Collateral Takers in the context of the Standards applicable to TPAs)?	22/05/2023
M11	Final External Communication on SCoRE: has final communication to users been provided (i.e. updated user guide to reflect the changes implemented, final message usage guidelines for A2A communication) related to the SCoRE Standards?	22/05/2023
M12	External Testing Completed for SCoRE: Is the testing of the changes introduced in order to comply with the SCoRE Standards with your user community completed (i.e. CSD participants / Collateral Givers and Collateral Takers in the context of the Standards applicable to TPAs)?	20/09/2024
M13	SCoRE Standards Implemented: have the SCoRE Standards been implemented?	18/11/2024

The current H2 2024 monitoring exercise focuses on milestones 1 to 11 given that Milestone 11 “Final external communication on SCoRE” (with a deadline of 22 May 2023) was meant to have been achieved by the time the survey closed. The findings of the monitoring exercise reflect the Milestones roadmap in place by the time the survey closed (i.e., 13 September 2024) and do not yet consider the AMI-SeCo reflections on the rescheduling of the existing SCoRE Standards implementation deadline from 18 November 2024 to 16 June 2025.

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

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

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

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

	Custodians	CSD - Euroclear France	TPA - BNP Paribas	TPA - Euroclear France
Milestone 1 June 2020	50%	Yes	Yes	Yes
Milestone 2 March 2021	50%	Yes	Yes	Yes
Milestone 3 July 2021	38%	Yes	12/24	Yes
Milestone 4 December 2021	38%	Yes	12/24	Yes
Milestone 5 December 2021	50%	Yes	Yes	Yes
Milestone 6 January 2022	50%	Yes	Yes	Yes
Milestone 7 June 2022	50%	Yes	12/25	Yes
Milestone 8 July 2022	38%	Yes	08/25	Yes
Milestone 9 March 2023	38%	Yes	10/25	Yes
Milestone 10 May 2023	25%	Yes	11/25	Yes
Milestone 11 May 2023	50%	tbc	09/24	tbc
Milestone 12 September 2024	38%	Yes	12/25	Yes
Milestone 13 November 2024	50%	Yes	12/25	Yes

4 Concluding remarks

The French CSD Euroclear France has met the current implementation milestones on time and expects to meet all the future ones in due time. Implementation of Corporate Action standards is on track for Euroclear France as a TPA, and BNPP TPA - despite its limited business scope as TPA (no triparty management services offered for monetary policy operations) - is planning to adopt them by December 2025. As regards custodians, notwithstanding improvements since 2021, the data continue to show a low level of compliance with the standard related to ISO 20022 messaging, and reveal heterogeneity across participants. The share of custodians expecting delays in the timely achievement of the final milestone increased from 25% in H2 2022 to 50% in the last monitoring exercises.

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