Triparty Collateral Management Adaptation Plan

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Euroclear Bank

| Activity | Triparty Collateral Management |
| --- | --- |
| Plan submitted by | Euroclear Bank |
| NSG | Belgium |
| Date | November 2022 |

# Background

The Adaptation Plan provides information on the changes which will be implemented to meet the AMI-SeCo Standards for Triparty Collateral Management which form part of the Single Collateral Management Rulebook for Europe (SCoRE). Full details of the Triparty Collateral Management Standards can be found on the [ECB website](https://www.ecb.europa.eu/paym/intro/publications/pdf/ecb.AMI-SeCo_Triparty_Collateral_Management.pdf?ae2b1ef39e8a462f0a0531513b17c0f3).

The document is structured as follows: Section 1 (Cover Letter) provides a high-level summary of the changes in order to implement the AMI-SeCo Standards. Section 2 (Adaptation Plan Table) then provides a more detailed overview per Standard covering a feasibility assessment and the implementation milestones.

# Cover Letter

We welcome and support AMI-SeCo's objective to harmonise the way market participants are running their collateral management activities across the European market, as well as all actions taken by AMI-SeCo to enact and monitor the newly defined standards for post-trade processes related to collateral management.

Euroclear Bank fully complies with Triparty SCoRE standards 5, 12, 14, 15 and 16, as well as the non-central process covered in standard 11.

For standards 4, 6, 8, 9 and 10 as well as with the non-central bank processes covered in standards 2 and 3, Euroclear follows the correct process and will become fully compliant once we implement the new ISO20022 messages for Triparty collateral management . Euroclear plans to deliver the ISO20022 equivalents of the current ISO15022 messages (MT527-558-569) in 2024. Detailed project planning for this is currently ongoing, as a result some milestones are not yet known. They will be communicated to the market as soon as they become available in the course of 2023. Practically, this will enable clients of Euroclear to manage their Triparty collateral management activity solely based on ISO20022 messaging if they wish to.

With regards to the remaining standards, namely standards 1, 7, 13 and 17 and the central bank processes of standards 2, 3 and 11, Euroclear Bank will provide a plan for the full implementation of the Single Triparty Model by Q1 2024, this plan will outline the timeline for the implementation of the remaining standards. The table below summarises our current compliance and the effect the planned delivery of ISO20022 in 2024 will have.

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| --- | --- | --- |
|  | Current status | Planned status in 2024 |
| Standard 1 | Not compliant | Not compliant, with plan provided in Q1 2024 |
| Standard 2 | Not compliant | Compliant for non-NCB flows, with plan provided in Q1 2024 |
| Standard 3 | Not compliant | Compliant for non-NCB flows, with plan provided in Q1 2024 |
| Standard 4 | Not compliant | Fully compliant |
| Standard 5 | Fully compliant | Fully compliant |
| Standard 6 | Not compliant | Fully compliant |
| Standard 7 | Not compliant | Not compliant, with plan provided in Q1 2024 |
| Standard 8 | Not compliant | Fully compliant |
| Standard 9 | Not compliant | Fully compliant |
| Standard 10 | Not compliant | Fully compliant |
| Standard 11 | Compliant for non-NCB flows | Compliant for non-NCB flows, with plan provided in Q1 2024 |
| Standard 12 | Fully compliant | Fully compliant |
| Standard 13 | Not compliant | Not compliant, with plan provided in Q1 2024 |
| Standard 14 | Fully compliant | Fully compliant |
| Standard 15 | Fully compliant | Fully compliant |
| Standard 16 | Fully compliant | Fully compliant |
| Standard 17 | Not compliant | Not compliant, with plan provided in Q1 2024 |

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For specific terminology please refer to the [ECB glossary](https://www.ecb.europa.eu/home/glossary/html/index.en.html) (available in English only).

# Adaptation Plan Table

| **AMI-SeCo Standard** | **Feasibility Assessment** | **Implementation Milestones** |
| --- | --- | --- |
| **No.** | **Name of Standard** | **Standard** | **Adaptation Required?** | **Description of Changes Required** | **Legal Barrier Identified?** | **Please indicate the expected date of completion of the following activities:** |
| **STANDARD 1** | **Implementation of ISO 20022 messages for triparty collateral management**  | *TPAs shall support the usage of ISO 20022 messages for triparty collateral management activities covered by the Standards.* |  Yes | Euroclear Bank doesn't support ISO20022 Triparty Collateral Management messages. |  No |

|  |  |  |  |
| --- | --- | --- | --- |
| **Analysis and Communication** | Yes | No | n/a |
| **M1:** Analysis started by 30/06/2020 | [x]  | [ ]  DD-MM-YYYY | [ ]  |
| **M2:** Initial communication by 01/03/2021  | [ ]  | [x]  01/12/2021 | [ ]  |
| **M3:** Analysis completed by 31/07/2021 | [ ]  | [x]  DD-MM-YYYY | [ ]  |
| **M4:** Documentation completed by 31/12/2021 | [ ]  | [x]  DD-MM-YYYY | [ ]  |
| **M5:** Detailed external communication by 31/12/2021 | [ ]  | [x]  DD-MM-YYYY | [ ]  |
| **Internal Adaptation**  | Yes | No | n/a |
| **M6:** Adaptation started by 01/01/2022 | [ ]  | [x]  01/06/2023 | [ ]  |
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| **M9:** Internal testing complete by 02/12/2022 | [ ]  | [x]  DD-MM-YYYY | [ ]  |
| **Testing and Implementation**  | Yes | No | n/a |
| **M10:** External testing started by 05/12/2022 | [ ]  | [ ]  DD-MM-YYYY | [ ]  |
| **M11:** Final external communication by 01/04/2023 | [ ]  | [ ]  DD-MM-YYYY | [ ]  |
| **M12:** External testing completed by 13/10/2023 | [ ]  | [ ]  DD-MM-YYYY | [ ]  |
| **M13:** Standard implemented by 20/11/2023 | [ ]  | [x]  01/03/2024 | [ ]  |

 |
| **Additional Information** | **Message Name** | **Message Identifier** |   |   |   |  |
| Triparty Collateral Transaction Instruction | colr.019 | Yes | Euroclear Bank doesn't support ISO20022 Triparty Collateral Management messages.  | No | See milestones above. |
| Triparty Collateral Status and Processing Advice | colr.020 |
| Triparty Collateral Allegement Notification | colr.021 |
| Triparty Collateral Collateral and Exposure Report | colr.022 |
| Triparty Collateral Unilateral Removal Request  | colr.023 |
| Triparty Collateral Allegement Notification Cancellation Request | colr.024 |
| Collateral Management Cancellation Request | colr.005 |
| Collateral Management Cancellation Status | semt.020 |
| Receipt Acknowledgment | admi.007 | Yes | Euroclear Bank doesn't support ISO20022 messages to obtain approval for the reversal of income payments.  | No  | Euroclear will implement these messages when it implements the central bank process of standard 11 – Handling of Corporate Actions, see the milestones for that standard. |
| Approval of Debit | camt.036 |
| Eligible Securities Creation Request | reda.025 | Yes | Euroclear Bank doesn't support ISO20022 messages for the exchange of eligibility and valuation data. | No | Euroclear will implement these messages when it implements standard 13 – Reference Data, see the milestones for that standard. |
| Eligible Securities Deletion Request | reda.075 |
| Collateral Value Creation Request | reda.024 |
| Close Link Creation Request | reda.027 |
| Close Link Deletion Request | reda.077 |
| Collateral Data Status Advice | reda.028 |
|  | Triparty Collateral Unilateral Removal Request | reda.074 | Yes | Euroclear Bank doesn't support ISO20022 messages for unilateral removal of securities | No | Euroclear will implement this message when it revises the way it processes unilateral removal requests to comply with standard 7 – Unilateral Removal, see the milestones for that standard. |
|  | Business Application Header | head.001 | Yes | Euroclear Bank doesn't support ISO20022 messages | No |  |
|  | Business File Header | head.002 | Yes | Euroclear Bank doesn't support ISO20022 messages | No |  |
| **STANDARD 2** | **Initiation of a triparty transaction** | *TPAs shall offer harmonised business processes and workflows for the initiation of a triparty collateral management transaction.* | Yes | Euroclear Bank doesn’t offer ISO20022 messaging yet and doesn’t support the specific flow for activity with central banks. Euroclear will support ISO20022 in 2024 and will provide a timeline for the necessary adjustments to its unilateral matching rules by Q1 2024 | No |

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| **M13:** Standard implemented by 20/11/2023 | [ ]  | [x]  DD-MM-YYYY | [x]  |

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| **STANDARD 3** | **Increase of a triparty transaction** | *TPAs shall support harmonised business processes and workflows for the increase of a triparty collateral management transaction.* | Yes |  Euroclear Bank doesn’t offer ISO20022 messaging yet and doesn’t support the specific flow for activity with central banks. Euroclear will support ISO20022 in 2024 and will provide a timeline for the necessary adjustments to its unilateral matching rules by Q1 2024 | No |

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| **Analysis and Communication** | Yes | No | n/a |
| **M1:** Analysis started by 30/06/2020 | [ ]  | [x]  01/11/2022 | [x]  |
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| **Testing and Implementation**  | Yes | No | n/a |
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| **STANDARD 4** | **Decrease of a triparty transaction** | *TPAs shall support harmonised business processes and workflows for the decrease of a triparty collateral management transaction.* | Yes |  Euroclear Bank doesn’t offer ISO20022 messaging. | No |

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| **Analysis and Communication** | Yes | No | n/a |
| **M1:** Analysis started by 30/06/2020 | [x]  | [ ]   | [x]  |
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| **M13:** Standard implemented by 20/11/2023 | [ ]  | [x]  01/03/2024 | [x]  |

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| **STANDARD 5** | **Revaluation of a triparty transaction** | *TPAs shall support harmonised business processes and workflows when revaluing a triparty collateral management transaction.* | Implemented |   | No |

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| **Analysis and Communication** | Yes | No | n/a |
| **M1:** Analysis started by 30/06/2020 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
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| **M13:** Standard implemented by 20/11/2023 | [ ]  | [ ]  DD-MM-YYYY | [x]  |

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| **STANDARD 6** | **Cancellation of a triparty instruction** | *TPAs shall support harmonised business processes and workflows for the cancellation of a triparty collateral management instruction.* | Yes | Euroclear Bank doesn’t offer ISO20022 messaging. | No |

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| **Analysis and Communication** | Yes | No | n/a |
| **M1:** Analysis started by 30/06/2020 | [x]  | [ ]  DD-MM-YYYY | [x]  |
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| **M13:** Standard implemented by 20/11/2023 | [ ]  | [x]  01/03/2024 | [x]  |

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| **STANDARD 7** | **Unilateral removal process** | *TPAs shall support harmonised business processes and workflows for the unilateral removal of a specific asset in triparty collateral management.* | Yes | Euroclear Bank supports a unilateral removal of a security from the collateral pool but does not support the harmonised messaging identified for this purpose by the CMHTF. | No |

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| **Analysis and Communication** | Yes | No | n/a |
| **M1:** Analysis started by 30/06/2020 | [ ]  | [x]  01/11/2022 | [ ]  |
| **M2:** Initial communication by 01/03/2021  | [ ]  | [x]  01/03/2024 | [ ]  |
| **M3:** Analysis completed by 31/07/2021 | [ ]  | [x]  01/12/2023 | [ ]  |
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| **M13:** Standard implemented by 20/11/2023 | [ ]  | [x]  DD-MM-YYYY | [ ]  |

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| **STANDARD 8** | **Reporting on flows** | *TPAs shall support harmonised business processes and workflows for the reporting on flows in order to provide real time information on securities collateralising triparty collateral transactions.* | Yes |  Euroclear Bank doesn’t offer ISO20022 messaging | No |

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| --- | --- | --- | --- |
| **Analysis and Communication** | Yes | No | n/a |
| **M1:** Analysis started by 30/06/2020 | [ ]  | [x]  01/11/2022 | [x]  |
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| **Testing and Implementation**  | Yes | No | n/a |
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| **M12:** External testing completed by 13/10/2023 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **M13:** Standard implemented by 20/11/2023 | [ ]  | [x]  01/03/2024 | [x]  |

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| **STANDARD 9** | **Reporting on stocks** | *TPAs shall support harmonised business processes and workflows for reporting on stocks in triparty collateral management.* | Yes |  Euroclear Bank doesn’t offer ISO20022 messaging. | No |

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| --- | --- | --- | --- |
| **Analysis and Communication** | Yes | No | n/a |
| **M1:** Analysis started by 30/06/2020 | [ ]  | [x]  01/11/2022 | [x]  |
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| **M13:** Standard implemented by 20/11/2023 | [ ]  | [x]  01/03/2024 | [x]  |

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| **STANDARD 10** | **Closure of a triparty transaction** | *TPAs shall support harmonised business processes and workflows when closing a triparty collateral management transaction.* | Yes |  Euroclear Bank doesn’t offer ISO20022 messaging. | No |

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| --- | --- | --- | --- |
| **Analysis and Communication** | Yes | No | n/a |
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| **M13:** Standard implemented by 20/11/2023 | [ ]  | [x]  01/03/2024 | [x]  |

 |
| **STANDARD 11** | **Handling of corporate actions** | *TPAs shall support harmonised business processes and workflows when handling corporate actions on securities allocated to a triparty collateral management transaction.* | Yes |  Euroclear Bank doesn’t offer ISO20022 messaging and doesn’t support the process to seek approval from the NCB. | No |

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| **Analysis and Communication** | Yes | No | n/a |
| **M1:** Analysis started by 30/06/2020 | [ ]  | [x]  01/11/2022 | [x]  |
| **M2:** Initial communication by 01/03/2021  | [ ]  | [x]  01/03/2024 | [x]  |
| **M3:** Analysis completed by 31/07/2021 | [ ]  | [x]  01/12/2023 | [x]  |
| **M4:** Documentation completed by 31/12/2021 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **M5:** Detailed external communication by 31/12/2021 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **Internal Adaptation**  | Yes | No | n/a |
| **M6:** Adaptation started by 01/01/2022 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **M7:** Adaptation completed by 30/06/2022 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **M8:** Internal testing started by 01/07/2022 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **M9:** Internal testing complete by 02/12/2022 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **Testing and Implementation**  | Yes | No | n/a |
| **M10:** External testing started by 05/12/2022 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **M11:** Final external communication by 01/04/2023 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **M12:** External testing completed by 13/10/2023 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **M13:** Standard implemented by 20/11/2023 | [ ]  | [x]  DD-MM-YYYY | [x]  |

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| **STANDARD 12** | **Partial settlement** | *TPAs shall support harmonised business processes and workflows for the partial settlement of a triparty collateral management instruction.* | Implemented |   | No |

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| **Analysis and Communication** | Yes | No | n/a |
| **M1:** Analysis started by 30/06/2020 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M2:** Initial communication by 01/03/2021  | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M3:** Analysis completed by 31/07/2021 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M4:** Documentation completed by 31/12/2021 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M5:** Detailed external communication by 31/12/2021 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **Internal Adaptation**  | Yes | No | n/a |
| **M6:** Adaptation started by 01/01/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M7:** Adaptation completed by 30/06/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M8:** Internal testing started by 01/07/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M9:** Internal testing complete by 02/12/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **Testing and Implementation**  | Yes | No | n/a |
| **M10:** External testing started by 05/12/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M11:** Final external communication by 01/04/2023 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M12:** External testing completed by 13/10/2023 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M13:** Standard implemented by 20/11/2023 | [ ]  | [ ]  DD-MM-YYYY | [x]  |

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| **STANDARD 13** | **Reference data** | *TPAs shall facilitate the communication of reference data by collateral givers and collateral takers using harmonised messaging.* | Yes | Euroclear Bank supports the provision of reference data by participants, but does not support the harmonised messaging identified for this purpose by the CMHTF. | No |

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| **Analysis and Communication** | Yes | No | n/a |
| **M1:** Analysis started by 30/06/2020 | [ ]  | [x]  01/01/2020 | [ ]  |
| **M2:** Initial communication by 01/03/2021  | [ ]  | [x]  01/03/2024 | [ ]  |
| **M3:** Analysis completed by 31/07/2021 | [ ]  | [x]  01/12/2023 | [ ]  |
| **M4:** Documentation completed by 31/12/2021 | [ ]  | [x]  DD-MM-YYYY | [ ]  |
| **M5:** Detailed external communication by 31/12/2021 | [ ]  | [x]  DD-MM-YYYY | [ ]  |
| **Internal Adaptation**  | Yes | No | n/a |
| **M6:** Adaptation started by 01/01/2022 | [ ]  | [x]  DD-MM-YYYY | [ ]  |
| **M7:** Adaptation completed by 30/06/2022 | [ ]  | [x]  DD-MM-YYYY | [ ]  |
| **M8:** Internal testing started by 01/07/2022 | [ ]  | [x]  DD-MM-YYYY | [ ]  |
| **M9:** Internal testing complete by 02/12/2022 | [ ]  | [x]  DD-MM-YYYY | [ ]  |
| **Testing and Implementation**  | Yes | No | n/a |
| **M10:** External testing started by 05/12/2022 | [ ]  | [x]  DD-MM-YYYY | [ ]  |
| **M11:** Final external communication by 01/04/2023 | [ ]  | [x]  DD-MM-YYYY | [ ]  |
| **M12:** External testing completed by 13/10/2023 | [ ]  | [x]  DD-MM-YYYY | [ ]  |
| **M13:** Standard implemented by 20/11/2023 | [ ]  | [x]  DD-MM-YYYY | [ ]  |

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| **STANDARD 14** | **Usage of baskets** | *TPAs shall support the usage of customised collateral baskets by collateral givers and collateral takers.* | Implemented |   | No |

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| **Analysis and Communication** | Yes | No | n/a |
| **M1:** Analysis started by 30/06/2020 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M2:** Initial communication by 01/03/2021  | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M3:** Analysis completed by 31/07/2021 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M4:** Documentation completed by 31/12/2021 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M5:** Detailed external communication by 31/12/2021 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **Internal Adaptation**  | Yes | No | n/a |
| **M6:** Adaptation started by 01/01/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M7:** Adaptation completed by 30/06/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M8:** Internal testing started by 01/07/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M9:** Internal testing complete by 02/12/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **Testing and Implementation**  | Yes | No | n/a |
| **M10:** External testing started by 05/12/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M11:** Final external communication by 01/04/2023 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M12:** External testing completed by 13/10/2023 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M13:** Standard implemented by 20/11/2023 | [ ]  | [ ]  DD-MM-YYYY | [x]  |

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| **STANDARD 15** | **Future dated processing** | *TPAs shall support the handling of future-dated requests submitted by collateral givers and collateral takers for triparty transactions settling in commercial bank money.* | Implemented |   | No |

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| **Analysis and Communication** | Yes | No | n/a |
| **M1:** Analysis started by 30/06/2020 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M2:** Initial communication by 01/03/2021  | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M3:** Analysis completed by 31/07/2021 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M4:** Documentation completed by 31/12/2021 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M5:** Detailed external communication by 31/12/2021 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **Internal Adaptation**  | Yes | No | n/a |
| **M6:** Adaptation started by 01/01/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M7:** Adaptation completed by 30/06/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M8:** Internal testing started by 01/07/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M9:** Internal testing complete by 02/12/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **Testing and Implementation**  | Yes | No | n/a |
| **M10:** External testing started by 05/12/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M11:** Final external communication by 01/04/2023 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M12:** External testing completed by 13/10/2023 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M13:** Standard implemented by 20/11/2023 | [ ]  | [ ]  DD-MM-YYYY | [x]  |

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| **STANDARD 16** | **Operating hours** | *TPAs shall provide access to triparty services on those days on which the RTGS is open. Allocations to triparty transactions involving central banks as collateral taker shall be possible according to a harmonised operating schedule on those days.* | Implemented |   |   |

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| **Analysis and Communication** | Yes | No | n/a |
| **M1:** Analysis started by 30/06/2020 | [ ]  | [ ]  01/11/2022 | [x]  |
| **M2:** Initial communication by 01/03/2021  | [ ]  | [ ]  01/03/2024 | [x]  |
| **M3:** Analysis completed by 31/07/2021 | [ ]  | [ ]  01/12/2023 | [x]  |
| **M4:** Documentation completed by 31/12/2021 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M5:** Detailed external communication by 31/12/2021 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **Internal Adaptation**  | Yes | No | n/a |
| **M6:** Adaptation started by 01/01/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M7:** Adaptation completed by 30/06/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M8:** Internal testing started by 01/07/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M9:** Internal testing complete by 02/12/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **Testing and Implementation**  | Yes | No | n/a |
| **M10:** External testing started by 05/12/2022 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M11:** Final external communication by 01/04/2023 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M12:** External testing completed by 13/10/2023 | [ ]  | [ ]  DD-MM-YYYY | [x]  |
| **M13:** Standard implemented by 20/11/2023 | [ ]  | [ ]  DD-MM-YYYY | [x]  |

 |
| **STANDARD 17** | **Cut-off times** | *TPAs shall offer harmonised cut-off times for triparty services involving central banks as collateral taker.* | Yes |   Minor adjustments to Euroclear’s cut-off times will be required to support the STM for central banks. |   |

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| **Analysis and Communication** | Yes | No | n/a |
| **M1:** Analysis started by 30/06/2020 | [ ]  | [x]  01/11/2022 | [x]  |
| **M2:** Initial communication by 01/03/2021  | [ ]  | [x]  01/03/2024 | [x]  |
| **M3:** Analysis completed by 31/07/2021 | [ ]  | [x]  01/12/2023 | [x]  |
| **M4:** Documentation completed by 31/12/2021 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **M5:** Detailed external communication by 31/12/2021 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **Internal Adaptation**  | Yes | No | n/a |
| **M6:** Adaptation started by 01/01/2022 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **M7:** Adaptation completed by 30/06/2022 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **M8:** Internal testing started by 01/07/2022 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **M9:** Internal testing complete by 02/12/2022 | [ ]  | [x]  DD-MM-YYYY | [ ]  |
| **Testing and Implementation**  | Yes | No | n/a |
| **M10:** External testing started by 05/12/2022 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **M11:** Final external communication by 01/04/2023 | [ ]  | [x]  DD-MM-YYYY | [x]  |
| **M12:** External testing completed by 13/10/2023 | [x]  | [ ]  DD-MM-YYYY | [x]  |
| **M13:** Standard implemented by 20/11/2023 | [x]  | [ ]  DD-MM-YYYY | [x]  |

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