

# SCoREBOARD

## Corporate Actions – H2 2023

Hungarian 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 2023 monitoring exercise conducted by the Hungarian NSG with the involvement among the following stakeholders:

14 entities are monitored in the Hungarian market

- 1 CSD – KELER
- 8 Custodians
- 5 Issuers

The findings of the monitoring exercise reflect the Milestones roadmap in place by the time the survey closed (i.e., 13 October 2023) and do not yet consider the AMI-SeCo reflections on the rescheduling of the existing SCoRE Standards implementation deadline from 8 April 2024 to 18 November 2024. 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.

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

## 1



### Key takeaways

Implementation of the Corporate Action Standards in the Hungarian market is behind schedule

KELER CSD, two custodians (out of eight) and two issuers (out of five) provided input to the H2 2023 survey, which shows an increase in the number of responses compared to H1 2023. One custodian and zero issuers have provided answers to previous survey, and one issuer has not provided any answer so far. This section presents the key findings of the survey for each entity type. Previous answers are also considered.

KELER CSD, several custodians and most issuers are currently behind schedule. A minimum one-year delay is expected in reaching market-wide full compliance.

**Figure 1**  
**Summary of the monitoring exercise**

	 <b>Response Rate</b>	 <b>Implementation Status of the standards</b>	<b>Are all milestones 1 to 11 inclusive achieved?</b>	<b>Will the last milestone 13 be implemented on time (i.e. by 08 April 2024)?</b>
<b>Custodians</b>	25%	Implemented 15.6% Implementation started 0.55% Analysis started 2.16% Analysis not started 0% Non applicable standards 6.61% Replies not submitted 75%	Average % of milestones achieved 13%	% of custodians on time 13%
<b>Issuers</b>	40%	Aware of obligations 32.1% Not aware of obligations 7.87% Replies not submitted 60%	<b>NA (milestones irrelevant for issuers)</b>	<b>NA</b>
<b>CSD - KELER</b>	Survey submitted	Implemented 5.10% Implementation started 0% Analysis started 71.9% Analysis not started 0% Non applicable standards 22.9% Replies not submitted 0%	<b>No</b>	<b>12/25</b>

**CSD – KELER**

KELER CSD intends to comply with applicable standards but indicates a minimum one-year delay for each implementation milestone

KELER CSD has started the necessary analyses to implement each Corporate Action Standard that it deems applicable for the Hungarian market. These analyses are expected to be finished with a two years delay compared to the date envisaged by the relevant milestone 3 (i.e. by July 2021), which is reflected in KELER CSD's compliance status.

KELER CSD intends to comply with each milestone with a minimum one-year delay. However, a subset of the Standards will be complied with by the April 2024 end-date, as KELER CSD intends to implement corporate action notification services for all corporate events and corporate action processing for non-elective events by this time. Implementation of the Standards for corporate action processing for elective corporate actions is expected by the end of 2025. This means that KELER CSD intends to apply a two-tiered approach in implementing the Standards, thereby

reaching compliance according to the implementation dates set in its approved adaptation plan.

Overall, KELER CSD has achieved Milestones 1 and 2, meaning that the additional milestones expected at this point in time, i.e. Milestones 3 to 9 are delayed.

### Custodians

10% of Custodian answers show that internal analysis has started

Two out of eight monitored custodians provided fresh answers for the H2 2023 monitoring exercise.

One custodian indicated that it meets the milestones already, there are a few corporate action types where developments are required to fully comply with standards. The other responding custodian indicated that milestones will be met with one year delay.

### Issuers

29% of Issuer answers showed awareness in previous surveys

Two of the monitored issuers provided answers for the H2 2023 monitoring exercise. The answers for previous surveys show varying levels of compliance.

Overall, the latest responses show that regarding most of the standards the issuers are aware of the obligations, while in case of a few standards the details of the standards should be clarified with the given issuers.

## 2 Compliance level with the standards

This section provides an overview of the current status of compliance with the corporate action 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 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 - KELER
1A: Notification	24%	37%	Y
1B: Instruction	24%		Y
1C: Advise	25%		Y
1D: Confirmation	22%		Y
1E: Reversal	25%		Y
1F: Meeting Notification	25%	20%	Y
1G: Meeting Instruction	25%		Y
1H: Meeting Results	20%		Y
2: Calculation of Proceeds	19%	40%	Y
3: Consistency of Information	17%	40%	Y
4: Rounding Rule 1	25%	40%	Y
4: Rounding Rule 2	25%	40%	Y
4: Rounding Rule 3	25%	40%	Y
4: Rounding Rule 4	25%	40%	Y
4: Rounding Rule 5	25%	40%	B
5: Negative Cash Flows	13%	20%	B
6: Business Day Rule		40%	Y
7: Securities Amount Data Rule 1		40%	B
7: Securities Amount Data Rule 2		40%	B
7: Securities Amount Data Rule 3		40%	B
7: Securities Amount Data Rule 4		40%	B
8: Payment Time Rule 1		20%	Y
8: Payment Time Rule 2		20%	Y
8: Payment Time Rule 3		20%	Y
8: Payment Time General Principle 3		20%	Y
9: Processing Status	25%	40%	Y
10: Rule 1	25%		Y
10: Rule 2	25%		Y
10: Rule 3	25%		N/A
11: Default Option	25%	40%	Y
12: Handling of Fees	25%		Y
13: Reversal	13%	40%	Y
14: Foreign Currency			N/A
15: ISO 20022 Messaging	4%		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. The Milestone dates refer to the timeline in place at the moment of survey closing (i.e., 13 October 2023) and do not yet consider the AMI-SeCo reflections on the rescheduling of the existing SCoRE Standards implementation deadline from 8 April 2024 to 18 November 2024.

**Table 2**  
Milestones identified by AMI-SeCo

Milestone	Description	Date
M1	<b>Analysis Started:</b> 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	<b>Initial Communication:</b> Has initial high-level communication with external stakeholders on the changes introduced by SCoRE commenced?	01/03/2021
M3	<b>Analysis Completed:</b> Have you completed an in-depth analysis of all applicable SCoRE Standards?	31/07/2021
M4	<b>Documentation Completed:</b> 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	<b>Detailed External Communication:</b> 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	<b>SCoRE Adaptation Started:</b> Have you started to adapt/develop the processes and procedures in order to comply with the SCoRE Standards?	01/01/2022
M7	<b>SCoRE Adaptation Complete:</b> Have you completed the necessary adaptations/developments for the processes and procedures in order to comply with the SCoRE Standards?	30/06/2022
M8	<b>Internal Testing Started for SCoRE:</b> 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	<b>Internal Testing Complete for SCoRE:</b> Have you completed the necessary internal testing?	10/03/2023
M10	<b>External Testing Started for SCoRE:</b> 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	<b>Final External Communication on SCoRE:</b> 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	<b>External Testing Completed for SCoRE:</b> 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)?	16/02/2024
M13	<b>SCoRE Standards Implemented:</b> have the SCoRE Standards been implemented?	08/04/2024

The current H2 2023 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.

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 - KELER
Milestone 1 June 2020	13%	Yes
Milestone 2 March 2021	13%	Yes
Milestone 3 July 2021	13%	06/24
Milestone 4 December 2021	13%	10/24
Milestone 5 December 2021	13%	10/24
Milestone 6 January 2022	13%	11/24
Milestone 7 June 2022	13%	03/25
Milestone 8 July 2022	13%	04/25
Milestone 9 March 2023	13%	05/25
Milestone 10 May 2023	13%	05/25
Milestone 11 May 2023	13%	09/25
Milestone 12 February 2024	13%	10/25
Milestone 13 April 2024	13%	12/25

## 4 Concluding remarks

KELER CSD plans to comply with all SCoRE Standards on Corporate Actions by the end of 2025, i.e. with a one-year delay, which also applies to interim milestones; however, one respondent custodian plan to achieve compliance by the expected April 2024 deadline, the other respondent custodian reports one year delay, which implies that KELER's delay affects custodians at a varying level. Issuers show a high level of awareness regarding the standards.

Overall, the expected milestones at this point in time, i.e. Milestones 1 to 9 are not achieved by the Hungarian market as a whole.

KELER provided the following additional information on milestone planning:

**Milestone 3-13:** KELER plans the implementation of the SCoRE CA standards by the end of 2025. That is reflected at each milestone is that not already achieved.

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