

Corporate Actions Adaptation Plan

Cyprus Stock Exchange

Activity	Corporate Actions
Plan submitted by	Cyprus Stock Exchange (CSE)
NSG	Cyprus
Date	June 2021

Background

The Adaptation Plan provides information on the changes which will be implemented to meet the AMI-SeCo Standards for Corporate Actions which form part of the Single Collateral Management Rulebook for Europe (SCoRE). Full details of the Corporate Actions Standards can be found on the ECB website.

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.

1 Cover Letter

In order to assess compliance with the harmonisation standards, several communications have taken place between the relevant actors. Also, the CSE will liaise with its system provider (ATHEX) in order to implement the technical changes. Detailed updates to the custodians are expected to follow shortly, as well.

However, we would like to highlight that the CSE, its Issuers and Participants (Custodians and Investment Firms) need to implement major changes to their current procedures and technical infrastructure in order to comply with the standards. These changes are expected to have a high cost that will also affect the Issuers and the Custodians/ Investment Firms of the CSE. We note that the cost of these standards seem to be disproportionally high for small CSD's. Nevertheless we would like to point out that the CSE is committed to make all necessary efforts and aims to be compliant with the Standards.

The major difficulties encountered in implementing the harmonisation standards are the following:

1. CHANGES TO TECHNICAL INFRASTRUCTURE (CSD System & implementing SWIFT messages)

The CSE will have to implement major changes to its infrastructure in order to comply with the standards. In specific, at the current juncture:

- Debt instruments are defined only in Units and not in nominal value.
- The function of Blocking of securities is used to block settlement instructions entered into the CSD on a specific security in its entirety (but does not block securities selectively or those subject to settlement of already matched settlement instructions which arise out of trades executed on the CSE Markets). Currently the CSE offers the option to selectively block securities, to Custodians in specific corporate actions.
- CSE communicates any information regarding Corporate Actions through announcements published on the CSE web-site which is the Officially Appointed Mechanism of Cyprus under the Transparency Directive, a function of the CSE Market. The CSD communicates information through its propriety system and with statements providing information of movement resulting from Corporate Actions. It is noted that, currently Swift messages are not used by the CSD. Thus, the CSD itself will have to implement Swift messages in the whole range of Corporate Actions. In addition, most of the CSE Brokers/Custodians (Participants) do not use Swift messages. Therefore, they will incur extra costs, which they may pass them on the Investors.

The CSE will liaise with its system provider (ATHEX) in order to implement these changes.

2. END INVESTOR LEVEL

The Cyprus legal system / CSD Law and the culture in the Cyprus Stock Market allows and acknowledges the right of the Investor to register on the CSD as a shareholder of a company (the Investor is the Account owner), without necessarily appointing a Custodian / Investment Firm as Account Servicer (in case that the Investor is inactive and does not wish to trade). This comes from the provisions of the CSD Law, which mandates the Cyprus CSD to "take over" the actual shareholders registry of the companies whose securities are held in dematerialized form in the CSD. As a result, a lot of corporate actions take place without the intervention of a Custodian / Investment Firm, but directly between the Issuer and the Investor.

Unfortunately many Investors currently do not proceed to appoint a Custodian / Investment Firm unless they wish to trade. This has 2 results:

- (i) Corporate actions are executed directly between the Investor and the Company / Issuer.
- (ii) The Investor may appoint its Custodian / Investment Firm to act on his behalf (this is not mandatory) and in fact most Investors act on their own behalf, giving

corporate actions instructions and making and receiving payments directly with the Issuer.

The CSD wishes to encourage all Investors to appoint a Custodian / Investment Firm and has taken a series of decisions towards this end. However, we consider it will be extremely difficult for all Investors to do so by 2022.

Therefore the CSD and the Custodian / Investment Firm at present do not form part of the chain of some corporate actions and all payments.

Taking into consideration the above, the CSE can implement the standards only for securities for which a Custodian / Investment Firm has been designated by the Investor. Thus for the rest of the Investors the corporate actions will have to continue to be enforced with the current procedure (e.g. notification via announcements). This also complicates the functions of the CSD as it entails two different procedures.

With the current issues of listed Government Bonds, on November 2022 the ISINs that will be registered on the CSD will only be 4 while for corporate the respective number will be 8.

We note that the CSE has a relationship with its Custodians / Investment Firms which are Operators of the CSD. The Investors are not clients of the CSE/CSD and the CSD cannot process any payments to the Investors themselves.

3. SIX YEAR REGISTERED GOVERNMENT BONDS FOR NATURAL PERSONS – NON LISTED (RETAIL BONDS)

The CSD registers, on behalf of the Public Debt Management Office (PDMO), the Retail Bonds issued by the Republic of Cyprus. They are restricted to Natural Persons (legal persons/ companies are not eligible), and are not tradeable in any market, nor are they listed in any stock exchange (including the Cyprus Stock Exchange Market). In addition, they cannot be used as collateral in the Eurosystem Monetary Policy Operations, since the bond holders are all natural persons. Issues noted in paragraph 2 are also applicable to these bonds, due to the fact that as part of the Government's policy, they are issued without the presence of a Custodian / Investment Firm. Therefore, and as agreed with the ECB, these Retail Bonds are outside the scope of AMI-SeCo Standards.

4. SERVICES CURRENTLY OFFERED BY CYPRUS CSD

At present many corporate actions take place without the intervention of a Custodian / Investment Firm, but directly between the Issuer and the Investor (or the CSD and the Investor). In fact this applies to the majority of the Investors as mentioned above.

Specific examples:

(i) Payment (interest or coupon repayment)

The interest on Government Bonds is calculated initially by the CSD. The CSD gives the relevant information to the Government (Treasury Department). The Treasury Department proceeds with the payment to the Bank Account of the Investor or its Custodian/ Investment Firm (according to the instructions of the Investor given through the CSD). For Retail Bonds, payment is made directly to the retail Investor (natural person).

For corporate Bonds, payment is made by the Issuer to the Investor or its Custodian / Broker (according to the instructions of the Investor given through the CSD) but payment is mostly made by cheques (sent through the post).

(ii) Tax deductions

The Law and the practice at present is that withholding tax (Defence Tax and General Health Scheme) are withheld by the Issuer. We consider this will continue to apply.

(iii) Corporate actions regarding new securities (e.g. warrants/ rights)

The Investor informs the Issuer directly with his instructions regarding the exercise of any rights e.g. to exercise or convert securities. As already mentioned in standard 10 for corporate actions that are applicable in the Cyprus Market, the CSE has to adjust the current juncture according to the standard. The fact that the Investor informs directly the Issuer about the instructions is a complicating factor.

Most corporate actions regarding the allocation / distribution of new securities is effected on pro rata basis – that is directly to the Investor or through its Custodian / Investment Firm.

(iv) General Meetings

The CSE at present is not in any way involved in the dissemination of information regarding general meetings, does not participate in Meetings on behalf of Investors or in the voting which takes place or in any handling of related fees. Please note that current experience shows that up to the present no General Meetings were convened for Government Bondholders.

Current procedures / information flow.

Regarding Government Bonds (Retail Bonds are excluded): (1) The Issuer notifies the CSE and Investors, via a public announcement, regarding the corporate action (e.g. Interest Payment). The Announcement is published on the CSE website and sent to the Custodians / Investment Firms via email and includes information such as the Record date, interest rate, payment amount, payment date etc. (2) The day after the Record date, the CSE requires one to three days in order to carry out all necessary checks (e.g. of payment instructions to the bank account provided by the Investors, tax deductions according to domicile as provided by the Investors and as verified by the Government Tax authorities). (3) The CSE submits to the Issuer (in this case

the Treasury of the Republic) the relevant electronic files. (4) The CSE submits electronic files to the Custodian / Investment Firms regarding the Investors on whose behalf (at the option of the Investor) they will collect the interest. (5) Based on the above data, the Treasury of the Republic of Cyprus proceeds, within 1-2 days from the date of receiving the files from CSE, to cash distribution through the Central Bank of Cyprus via SEPA and/or Target 2.

Regarding Corporate Bonds the current procedure entails the following: (1) The Issuer notifies the CSE and Investors, via a public announcement, regarding the corporate action (e.g. Interest Payment). The Announcement is published on the CSE website and sent to the Custodians / Investment Firms via email and includes information such as the Record date, interest rate, payment amount, the payment date etc. (2) The day after the Record date, the CSE provides the Issuer with an electronic registry in which the beneficiary owners are indicated. (3) The CSE submits electronic files to the Custodians / Investment Firms regarding the Investors on whose behalf (at the option of the Investor) they will collect the interest. (4) The Issuer proceeds to the cash distribution (please note that the majority of the Investors are paid by cheque).

5. GENERAL REMARKS / UPDATED ADAPTATION PLAN

There have been amendments in relation to the Adaptation Plan submitted to the CBC dated 20/12/2019. In specific, out of 27 CA events that the CSE/CSD indicated that adaptation was required (as submitted in the adaptation plan dated 29/1/2020), at this juncture the CSE/CSD has concluded that only 11 CA events require adaptation.

The amendments arise out of the following reasons:

- Since the beginning of the operation of the CSE/CSD (in 2001), the Corporate Actions that have occurred are only the ones that are mentioned in the updated Adaptation Plan. Moreover the CSE will Implement Corporate Actions that most likely may occur in the future.
- The amended implementation plan covers all listed Government and Corporate Bonds currently in the CSD.
- The updated version has been finalized after the input received by the Public Debt Management Office, Ministry of Finance, which is the Issuer of Government Bonds in Cyprus.
- Based on the existing issuances, by November 2023 only two Government Bonds will still be listed on the CSE Market and registered in the CSD.
- The CSE intends to cover all Market needs. The Corporate Actions that will be implemented from the outset by the CSE will be described in a Manual provided, in the Testing and Implementation phase, to the Market Participants, including Corporate Bonds Issuers. In case a Participant

wishes to implement a Corporate Action which is not included in the ones already provided by the CSE, it will give the CSE notice in advance, and the CSE will proceed to its implementation.

- The CSE intends to constantly review the Corporate Actions in order to meet the Market Participants /Market needs.
- The CSE has been in touch to inform the Issuers' Committee regarding this
 intention and will formally inform the Committee and all Corporate Bond
 Issuers (currently ten Corporate Bonds registered in the CSD, out of which
 three will mature and will be delisted by 2023) in writing, with a circular.
- This approach is evaluated as being the most practical and efficient in respect to resources and cost, having in mind the extensive changes which will have to be implemented by the CSE.
- Finally, the CSE has decided to adopt this approach taking into consideration other projects that will be implemented during the current and future time period (e.g. SRDII, Settlement Discipline, T2-T2S consolidation).

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For specific terminology please refer to the ECB glossary (available in English only).

2 Adaptation Plan Table

	AMI-	SeCo Standard		Feasibility Assessment		Implementation Milestone	s		
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of th	e follo	owing activities:	
	Harmonised business process	The Business Processes & Workflows and Key Data Elements				Analysis and Communication	Yes	No	n/a
	and workflows per	are described in the following				M1: Analysis started by 30/06/2020		⊠ 01/07/2021	
	CA event	sections of the AMI-SeCo Corporate Action Standards				M2: Initial communication by 01/03/2021		⊠ 31/03/2021	
		document. Please refer to				M3: Analysis completed by 31/07/2021		⊠ 31/12/2021	
		Standards 1A to 1H below:				M4: Documentation completed by 31/12/2021		⊠ 31/01/2022	
						M5: Detailed external communication by 31/12/2021		⊠ 28/02/2022	
						Internal Adaptation	Yes	No	n/a
						M6: Adaptation started by 01/01/2022		⊠ 01/07/2021	
1						M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY	
						M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY	
						M9: Internal testing complete by 02/12/2022		⊠ 01/01/2023	
						Testing and Implementation	Yes	No	n/a
						M10: External testing started by 05/12/2022		⊠ 31/12/2022	
						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		□ DD-MM-YYYY	
1A	Corporate Action Notification	The Account Servicer shall notify the Account Owner about the details of a corporate action event in accordance with a set of harmonised business processes, workflows and key data elements.							
	Business Processes & Workflows	Key Data Elements							
Additional Information	1a. Notify [ca.1.01]	Table 1	Adaptation Required	The Cyprus CSD is a direct holding model and accounts are held at the end-investor level ("final Investor level"). At the current juncture, there is no notification procedure via SWIFT. The CSD will implement ISO 20022 messaging since today the notification is done through email (for Custodians / Investment Firms) or via announcement on the web site of the CSE (for Investors). Adaptation is required in terms of flow, in	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.				

	AMI-S	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:
				terms of implementing swift messaging and in terms of the content.		
	1b. Update [ca.1.02]	Table 1	Adaptation Required	Enhance message contents and implement ISO 20022		
	1c. Cancel [ca.1.03]	Table 2	Adaptation Required	messaging.		
1B	Corporate Action Instruction	Instructions on elective corporate actions shall be processed in accordance with a set of harmonised business processes, workflows and key data elements.				
	Business Processes & Workflows	Key Data Elements				
	2a. Instruction [ca.2.01]	Table 3	Adaptation Required	CDCR is a direct holding model and accounts are held at the end-investor level. The CSD will implement ISO 20022 messaging. The elective corporate actions is not applicable for Government Bonds. It only applies to Non Listed Retail Bonds that fall out of the scope of AMI SECO Standards. However, it may be applicable for Corporate Bonds.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a	
ion	2b. Instruction Status Advice [ca.2.02]	Table 4	Adaptation Required	The CSD will implement ISO 20022 messaging. The elective corporate	straightforward process with immediate	
nformat	2c. Instruction Cancellation Request [ca.2.03]	Table 5	Adaptation Required	actions is not applicable for Government Bonds. It only applies to Non Listed Retail	effect.	
Additional Information	2d. Instruction Cancellation Request Status Advice [ca.2.04]	Table 6	Adaptation Required	Bonds that fall out of the scope of AMI SECO Standards. May be applicable for Corporate Bonds.		
1C	Corporate Action Advice	The Account Servicer shall be able to provide Preliminary Advice notifications in accordance with a set of harmonised business processes, workflows and key data elements.				
Additio nal	Business Processes & Workflows	Key Data Elements				

	AMI-S	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:		
	3a. Movement Preliminary Advice [ca.3.01]	Table 7	Adaptation Required	At the moment, the CSD forwards an electronic file to the Treasury of the Republic of Cyprus (this is the FINAL calculation of entitlements). The concept of pre-advise message is not currently used. To this end, the CSD will have to implement ISO 20022 messaging. For corporate Bonds the day after the Record Date, the CSE provides to the Issuer (upon the Issuer's request), the Registry which identifies the beneficiary holders (account owners) who are entitled to receive Interest. The Issuer is responsible for the cash payment of the Interest, for the maintenance of the instructions payment and the Tax deductions. Cash payments are distributed to the Investor (account owner) or through its Custodian / Investment Firm, at the Investor's discretion. Securities payments are distributed to the Investor (account owner) either directly or through the Custodian / Investment Firm, on a pro rata basis. The CSE will align the distribution process for securities and for cash.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.			
	3b. Movement Preliminary Advice Cancellation [ca.3.02]	Table 8	Adaptation Required	The CSD will implement ISO 20022 messaging.				
1D	Corporate Action Confirmation	The Account Servicer shall confirm the execution of a corporate action in accordance with a set of harmonised business processes, workflows and key data elements.						
Addition	Applicable Business Processes & Workflows	Key Data Elements						

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:
4a. CA Event Processing Status Advice[ca.4.01]	Table 9	Adaptation Required	At the current juncture, the CSD sends an electronic file to the Treasury of the Republic (calculations, tax deductions), after that the		
4b. Movement Confirmation [ca.4.02]	Table 10		deductions), after that the Treasury sends payment instructions (SEPA Payments) to the Central Bank, which then proceeds with the cash settlements in TARGET2-CY. Afterwards, the Treasury of the Republic receives confirmation from the Central Bank of Cyprus, that the corporate action is settled and also for the nonsettled instructions. The current procedure does not entail a confirmation of the Corporate Action by the Account Servicer to the relevant parties. The CSD will implement ISO 20022 messaging. Thus for corporate Bonds the day after the Record Date, the CSE provides to the Issuer (upon its request), the Registry which identifies the beneficiary holders (account owners) who are entitle to receive Interest. The Issuer is responsible for the cash payment of the Interest, for the maintenance of the instructions payment and the Tax deductions. Cash payments are distributed to the Investor (account owner) or through its Custodian / Investment Firm, at the Investor's discretion. Securities payments are distributed to the Investor (account owner) either directly or through the Custodian / Investment Firm, on a pro rata basis. The CSE will align the distribution process for securities and for cash.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
4c. Payment Confirmation [ca.4.03]	Table A and B	Adaptation Required	The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be	

	AMI-S	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:
					adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
1E	Corporate Action Reversal	The Account Servicer shall execute the reversal of a corporate action in accordance with a set of harmonised business processes, workflows and key data elements.				
	Applicable Business Processes & Workflows	Key Data Elements				
Additional Information	5a. Movement Preliminary Advice [ca.5.01]	Table 7	Adaptation Required	At the current juncture, the Public Debt Office sends a formal letter to the CSD, and asks for correction. The current procedure does not entail a CA Movement Preliminary Advice message by the Account Servicer to the relevant parties. The CSD will implement ISO 20022 messaging. In case of a cash reversal, the pre-advice shall be sent sufficiently in advance of the reversal so that recipients have adequate time for cash management. In case the reversal is triggered by itself, the Public Debt Management Office (PDMO) will send to CSE a reversal announcement in sufficient time before the reversal takes place. The announcement will include the information needed according to the related standard. The current procedure does not entail a CA Movement Preliminary Advice message by the Account Servicer to the relevant parties.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
Additic	5b. Payment Confirmation [ca.5.02]	Table A and B				

	AMI-S	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:
	5c. Movement Reversal Advice [ca.5.03]	Table 11	Adaptation Required	The CSD will implement ISO 20022 messaging. In case of a cash reversal, the pre-advice shall be sent sufficiently in advance of the reversal so that recipients have adequate time for cash management.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
1F	Meeting Event Notifications	The Account Servicer shall notify the Account Owner about the details of a meeting event in accordance with a set of harmonised business processes, workflows and key data elements.				
	Business Processes & Workflows	Key Data Elements				
	1a. Meeting Notification [me.1.01]	Table 12	Adaptation Required	At the current juncture, the meeting event is the Issuers obligation and the CSD is not involved in the process.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
ation	1b. Meeting Cancellation [me.1.02]	Table 13	Adaptation Required	This may be covered during implementation of SRDII requirements. Please note that announcement		
Additional Information	1c. Meeting Entitlement Notification [me.1.03]	Table 14	Adaptation Required	regarding the meeting is uploaded on the web site of the CSE and sent to Custodians / Investment Firms via email. CSD will have to implement ISO 20022 messaging.		
1G	Meeting Event Instructions	The Account Owner (or the party holding the right to vote) shall instruct on meeting events in accordance with a set of harmonised business processes, workflows and key data elements.				
	Business Processes & Workflows	Key Data Elements				
noisemation	2a. Meeting Instruction [me.2.01]	Table 15	Adaptation Required	At the current juncture, the meeting events is the Issuers obligation and the CSD is not involved in the process. This may be covered during implementation of SRDII requirements.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a	
: <u>:</u> :000	2b. Meeting Instruction	Table 17	Adaptation Required		straightforward process with	

	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	ne follo	owing activities:	
	Cancellation Request [me.2.02]				immediate effect.				
	2c. Meeting Instruction Status [me.2.03]	Table 16	Adaptation Required	May be covered during implementation of SRDII					
	2d. Meeting Vote Execution Confirmation [me.2.04]	Table 18	Adaptation Required	requirements.					
1H	Meeting Event Results	The Account Servicer shall disseminate meeting results in accordance with a set of harmonised business processes, workflows and key data elements.							
	Business Processes & Workflows	Key Data Elements							
Additional Information	3a. Meeting Result Dissemination [me.3.01]	Table 19	Adaptation Required	At the current juncture, the meeting event is the Issuers obligation and the CSD is not involved in the process. May be covered during implementation of SRDII requirements.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.				
	Provision of data	The corporate action notification, as communicated by the Account				Analysis and Communication	Yes	No	n/a
	necessary for calculation of	Servicer, shall include the				M1: Analysis started by 30/06/2020		⊠ 01/07/2021	
	proceeds	necessary data elements required to calculate the cash and / or				M2: Initial communication by 01/03/2021		⊠ 31/03/2021	
		securities movements.				M3: Analysis completed by 31/07/2021		⊠ 31/12/2021	
						M4: Documentation completed by 31/12/2021		⊠ 31/01/2022	
2						M5: Detailed external communication by 31/12/2021		⊠ 28/02/2022	
						Internal Adaptation	Yes	No	n/a
						M6: Adaptation started by 01/01/2022		⊠ 01/07/2021	
						M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY	
						M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY	
						M9: Internal testing complete by 02/12/2022		⊠ 01/01/2023	

	AMI	-SeCo Standard		Feasibility Assessment		Implementation Mileston	nes		
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of	the foll	owing activities:	
						Testing and Implementation	Yes	No	n/a
						M10: External testing started by 05/12/2022		⊠ 31/12/2022	
						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		□ DD-MM-YYYY	
	Business Processe	es & Workflows							
	Event ID	CA Event Name							
	1. ACTV T	rading Status: Active	Adaptation Required	Both commencement and reactivation need further technical developments. The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.				
_		Repurchase Offer / Issuer Bid / Reverse Rights	N/A	Currently, there is no process for repurchase offer notification. Currently, for off-exchange transaction there is an announcement in the official newspaper of the government.	N/A				
-		Bond Holder Meeting	Adaptation Required	Currently the process is not in place. Will be introduced with the new standard. The adaptation for ISO 20022 will follow.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.				
	4. BPUT F	Put Redemption	N/A	- Cyprus jurisdiction currently					
	5. BRUP E	Bankruptcy	N/A	does not support the	N/A				
	6. CAPI C	Capitalisation	N/A	specific Corporate Action.					
	7. CERT N	Non-US TEFRA D Certification	N/A	N/A	N/A				
_	8. CHAN C	Change	Adaptation Required	Technical adaptation is needed. The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the				

	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:
					approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
		lass Action / Proposed Settlement	N/A	N/A. The event is primarily used in the US and some European markets today.	N/A	
	10. CMET C	ourt Meeting	N/A	Cyprus jurisdiction currently does not support the specific Corporate Action.	N/A	
	11. CONS C	onsent	Adaptation Required	Technical adaptation is needed. The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
	12. CREV C	redit Event	N/A	Currently, no credit derivatives are offered by our CSD.	N/A	
	13. DFLT B	ond Default	N/A	Cyprus jurisdiction currently does not support the specific Corporate Action.	N/A	
	14. DLST T	rading Status: Delisted	Adaptation Required	The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
	15. DRAW D	rawing	N/A	No such option in Cyprus jurisdiction.	N/A	
		isclosure	N/A	No such option in Cyprus jurisdiction.	N/A	
		utch Auction	N/A	N/A	N/A	
	18. EXOF E	xchange	Adaptation Required	The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the	

	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:
					CSE's Council, which is rather a straightforward process with immediate effect. Public Debt Management Office can only do this for the future issuances, not for the existing issues. Consequently, the adaptation of harmonisation standards cannot have retroactive effect	
	19. EXTM M	aturity Extension	N/A	Cyprus jurisdiction currently does not support the specific Corporate Action.	N/A	
		crease in Value	N/A	Cyprus jurisdiction currently does not support the specific Corporate Action.	N/A	
	21. INFO In	formation	N/A	Cyprus jurisdiction currently does not support the specific Corporate Action.	N/A	
	22. INTR In	terest Payment	Adaptation Required	Technical adaptation is needed. The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect. Public Debt Management Office can only do this for the future issuances, not for the existing issues. Consequently, the adaptation of harmonisation standards cannot have retroactive effect	

	AMI-S	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:
	23. LIQU Lie	quidation Payment	N/A	Cyprus jurisdiction currently does not support the specific Corporate Action.	N/A	
	24. MCAL Fu	ull Call / Early Redemption	Adaptation Required	Technical adaptation is needed. The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect. Public Debt Management Office can only do this for the future issuances, not for the existing issues. Consequently, the adaptation of harmonisation standards cannot have retroactive effect	
	25. OTHR O	ther Event	Adaptation Required	Technical adaptation is needed. The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect. Public Debt Management Office can only do this for the future issuances, not for the existing issues. Consequently, the adaptation of harmonisation standards cannot have retroactive effect	

	AMI-	SeCo Standard		Feasibility Assessment		Implementation Milestones
o. Na	ame of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the following activities:
		ari-Passu	N/A	Cyprus jurisdiction does not support this event	N/A	
27		artial Redemption Without Pool Factor eduction	N/A	Cyprus jurisdiction does not support this event. If in the future this changes, the CSE will implement ISO 20022 messages.	N/A	
28	B. PINK P	ayment in Kind	N/A	Cyprus jurisdiction does not support this event	N/A	
		lace of Incorporation	N/A	Cyprus jurisdiction currently does not support this entitlement calculation.	N/A	
30		stalment Call	N/A	Cyprus jurisdiction currently does not support this entitlement calculation.	N/A	
	R	artial Redemption With Pool Factor eduction	N/A	Cyprus jurisdiction does not support this event	N/A	
32	2. REDM Fi	inal Maturity	Adaptation Required	The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
33	B. REDO R	edenomination	N/A	Cyprus jurisdiction currently does not support this entitlement calculation.	N/A	
34	. REMK R	emarketing Agreement	N/A	Cyprus jurisdiction currently does not support this entitlement calculation.	N/A	
35		termediate Securities Distribution	N/A	Cyprus jurisdiction currently does not support this entitlement calculation.	N/A	
36	S. SUSP T	rading Status: Suspended	Adaptation Required	The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
	P	ender / Acquisition / Takeover / urchase Offer	N/A	Cyprus jurisdiction currently does not support this entitlement calculation.	N/A	
38	3. TREC T	ax Reclaim	N/A	Cyprus jurisdiction does not support this event	N/A	

	AMI-S	SeCo Standard		Feasibility Assessment		Implementation Milestone	Implementation Milestones			
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of th	e follo	owing activities:		
	39. WTRC W	ithholding Tax Relief Certification	N/A	Cyprus jurisdiction does not support this event	N/A					
	40. WRTH W	orthless	N/A	Cyprus jurisdiction does not support this event	N/A					
	Consistency of information	Investor (I)CSDs and Custodians shall remit information on CA				Analysis and Communication	Yes	No	n/a	
	provided by	events in accordance with the				M1: Analysis started by 30/06/2020		⊠ 01/07/2021		
	Issuer CSDs, Investor CSDs &	information received from the Issuer (I)CSD. All CA event types				M2: Initial communication by 01/03/2021		⊠ 31/03/2021		
	Custodians	announced by the Issuer CSD				M3: Analysis completed by 31/07/2021		⊠ 31/12/2021		
		must be supported by all Investor (I)CSDs / Custodians. All Issuer				M4: Documentation completed by 31/12/2021		⊠ 31/01/2022		
		CSDs shall use corporate action				M5: Detailed external communication by 31/12/2021		⊠ 28/02/2022		
		event types in a consistent manner.				Internal Adaptation	Yes	No	n/a	
						M6: Adaptation started by 01/01/2022		⊠ 01/07/2021		
3						M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY		
						M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY		
						M9: Internal testing complete by 02/12/2022		⊠ 01/01/2023		
						Testing and Implementation	Yes	No	n/a	
						M10: External testing started by 05/12/2022		⊠ 31/12/2022		
						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		□ DD-MM-YYYY		
	be processed in a con accordance with the of document, so that the types both within an i CSDs. The CA event Standard. Please indi adaptations are required CA Event ID	events listed in the table below shall nsistent manner across Europe in details specified in Section 4 of this ere is consistency in the usage of event individual CSD, and across different is listed below are in the scope of the icate for each CA event whether ired in order to adhere to the Standard. CA Event Name								
		Trading Status: Active			The CSD's legal					
			Adaptation Required	Both commencement and reactivation need further technical developments. The CSD will implement ISO 20022 messaging.	framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.					
		Repurchase Offer / Issuer Bid / Reverse Rights	N/A	Currently, there is no process for repurchase offer notification. Currently, for	N/A					

	AMI-	SeCo Standard		Feasibility Assessment		Implementation Milestones			
э.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the following activities:			
				off-exchange transaction there is an announcement in the official newspaper of the government.					
_		Bond Holder Meeting	Adaptation Required	Currently the process is not in place. Will be introduced with the new standard. The adaptation for ISO 20022 will follow.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.				
		Put Redemption	N/A						
		Bankruptcy	N/A	Cyprus jurisdiction does not support this eventA	N/A				
		Capitalisation	N/A						
	7. CERT	Non-US TEFRA D Certification	N/A	Cyprus jurisdiction does not support this event	N/A				
		Change	Adaptation Required	Technical adaptation is needed. The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.				
_	9. CLSA	Class Action / Proposed Settlement	N/A	N/A. The event is primarily used in the US and some European markets today.	N/A				
	10. CMET	Court Meeting	N/A	Cyprus jurisdiction does not support this event	N/A				
	11. CONS	Consent	Adaptation Required	Technical adaptation is needed. The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect				
	12. CREV	Credit Event	N/A	Currently, no credit derivatives are offered by our CSD.	N/A				

	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:
		Bond Default	N/A	Cyprus jurisdiction currently does not support the specific Corporate Action.	N/A	
		Trading Status: Delisted	Adaptation Required	The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
		Drawing	N/A	No such option in Cyprus jurisdiction.	N/A	
		Disclosure	N/A	No such option in Cyprus jurisdiction.	N/A	
		Dutch Auction	N/A	No such option in Cyprus jurisdiction.	N/A	
		Exchange	Adaptation Required	The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect. Public Debt Management Office can only do this for the future issuances, not for the existing issues. Consequently, the adaptation of harmonisation standards cannot have retroactive effect.	
		Maturity Extension	N/A	Cyprus jurisdiction currently does not support the specific Corporate Action.	N/A	
	20. INCR	Increase in Value	N/A	Cyprus jurisdiction currently does not support the specific Corporate Action.	N/A	

	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:
	21. INFO	Information	N/A	Cyprus jurisdiction currently does not support the specific Corporate Action.	N/A	
	22. INTR	Interest Payment	Adaptation Required	The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
	23. LIQU	Liquidation Payment	N/A	Cyprus jurisdiction currently does not support the specific Corporate Action.	N/A	
	24. MCAL	Full Call / Early Redemption	Adaptation Required	The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
		Other Event	Adaptation Required	The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
	26. PARI	Pari-Passu	N/A	Cyprus jurisdiction does not support this event	N/A	
	27. PCAL	Partial Redemption Without Pool Factor Reduction	N/A	Cyprus jurisdiction does not support this event. If in the future this changes, the CSE will implement ISO 20022 messages.	N/A	
	28. PINK	Payment in Kind	N/A	Cyprus jurisdiction does not support this event	N/A	
	29. PLAC	Place of Incorporation	N/A	Cyprus jurisdiction currently does not support this entitlement calculation.	N/A	

	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:
		Instalment Call	N/A	Cyprus jurisdiction currently does not support this entitlement calculation.	N/A	
_		Partial Redemption With Pool Factor Reduction	N/A	Cyprus jurisdiction does not support this event	N/A	
		Final Maturity	Adaptation Required	The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
		Redenomination	N/A	Cyprus jurisdiction currently does not support this entitlement calculation.	N/A	
		Remarketing Agreement	N/A	Cyprus jurisdiction currently does not support this entitlement calculation.	N/A	
		Intermediate Securities Distribution	N/A	Cyprus jurisdiction currently does not support this entitlement calculation.	N/A	
		Trading Status: Suspended	Adaptation Required	The CSD will implement ISO 20022 messaging.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	
-	37. TEND	Tender / Acquisition / Takeover / Purchase Offer	N/A	Cyprus jurisdiction currently does not support this entitlement calculation.	N/A	
	38. TREC	Tax Reclaim	N/A	Cyprus jurisdiction does not support this event	N/A	
-	39. WTRC	Withholding Tax Relief Certification	N/A	Cyprus jurisdiction does not support this event	N/A	
	40. WRTH	Worthless	N/A	Cyprus jurisdiction does not support this event	N/A	

	AMI-	SeCo Standard		Feasibility Assessment		Implementation Milestone	es		
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the	ne folk	owing activities:	
	Rounding rules	Harmonised rounding rules shall be applied for the calculation of				Analysis and Communication	Yes	No	n/a
		cash payments and securities				M1: Analysis started by 30/06/2020		⊠ 01/07/2021	
		movements.				M2: Initial communication by 01/03/2021		⊠ 31/03/2021	
						M3: Analysis completed by 31/07/2021		⊠ 31/12/2021	
						M4: Documentation completed by 31/12/2021		⊠ 31/01/2022	
						M5: Detailed external communication by 31/12/2021		⊠ 28/02/2022	
						Internal Adaptation	Yes	No	n/a
4						M6: Adaptation started by 01/01/2022		⊠ 01/07/2021	
4						M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY	
						M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY	
						M9: Internal testing complete by 02/12/2022		⊠ 01/01/2023	
						Testing and Implementation	Yes	No	n/a
						M10: External testing started by 05/12/2022		⊠ 31/12/2022	
						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		□ DD-MM-YYYY	
	Rounding rule no.	For cash payments, the cash amount to be paid is to be rounded down to the number of decimals permissible in the payment currency (i.e. to 2 decimals in case of EUR payments). Accordingly, and as an example, a cash amount of EUR 2.556 should be rounded down to EUR 2.55	Adaptation Required	Currently CSD does not support this rounding method	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.				
	Rounding rule no. 2	For securities movements, the securities amount should be rounded down to the nearest full unit.	Implemente d						
7 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 - 1 -	Rounding rule no.	For the calculation of cash payment amounts or securities movement amounts relating to a specific securities account, the ratio applicable to the entire issue should be applied to the total holding in the parent ISIN on the securities account. (There should be no intermediate step whereby a ratio per 1,000 nominal is calculated, and then applied).	N/A	This is not applicable for Cyprus as the per 1000 nominal is not used.	N/A				

	AMI-S	SeCo Standard		Feasibility Assessment		Implementation Mileston	es		
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of t	he folk	owing activities:	
	Rounding rule no.	The ratio specified by the Issuer CSD in the event notification should be passed on in its entirety in the event notification sent by all Account Servicers and Custodians in the custody chain. (There should be no rounding up, or rounding down, or truncation, of the ratio).	N/A	This applies to custodians.	N/A				
	Negative cash	Issuer CSDs and Investor CSDs				Analysis and Communication	Yes	No	n/a
	flows	shall support the processing of corporate actions where the				M1: Analysis started by 30/06/2020		⊠ 01/07/2021	
		underlying security has a fixed negative interest rate or a floating				M2: Initial communication by 01/03/2021		⊠ 31/03/2021	
		rate coupon. Any negative interest				M3: Analysis completed by 31/07/2021		⊠ 31/12/2021	
		shall result in a cashflow from the Investor to the Issuer which shall				M4: Documentation completed by 31/12/2021		⊠ 31/01/2022	
		be processed using the Interest				M5: Detailed external communication by 31/12/2021		⊠ 28/02/2022	
		Payment (INTR) event.		CSD does not accept		Internal Adaptation	Yes	No	n/a
		Implemente	coupons with negative		M6: Adaptation started by 01/01/2022		⊠ 01/07/2021		
5		d	interest rate, so negative cash payments cannot		M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY		
				occur.		M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY	
						M9: Internal testing complete by 02/12/2022		⊠ 01/01/2023	
						Testing and Implementation	Yes	No	n/a
						M10: External testing started by 05/12/2022		⊠ 31/12/2022	
						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		□ DD-MM-YYYY	
	floating interest rate, Investor to the Issuer applicable to CSDs at and Investor CSD. If a positive interest rate, floor of zero or above the security), so that I	Inegative interest rate, or with a may result in a payment from the of the security. The Standard is cting in their role as both Issuer CSD a CSD accepts only securities with a or with a floating rate coupon with a (fixed in the terms and conditions of negative cash payments do not occur, ned to comply with this standard.							
	Business day rule	If the payment date of a corporate action falls on a non-business day		Partially implemented At the current juncture, for	The CSD's legal framework	Analysis and Communication	Yes	No	n/a
		(in the country of the currency in		government bonds the	needs to be	M1: Analysis started by 30/06/2020		⊠ 01/07/2021	
6		which the payment is due), the payment shall be made on the next business day. Adaptation Required	Adaptation	Treasury of the Republic ensures that payments are	adapted. This needs the	M2: Initial communication by 01/03/2021		⊠ 31/03/2021	
			made on the next business	approval of the	M3: Analysis completed by 31/07/2021		⊠ 31/12/2021		
				date. In the event that the payment date falls on a non-	CSE's Council, which is rather a	M4: Documentation completed by 31/12/2021		⊠ 31/01/2022	

AMI-SeCo Standard		Feasibility Assessment		Implementation Milestone	es		
No. Name of Standard Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the	ne follo	wing activities:	
		business day then the payment shall be made on	straightforward process with	M5: Detailed external communication by 31/12/2021		⊠ 28/02/2022	
		the next business day.	immediate effect	Internal Adaptation	Yes	No	n/a
		However, for Corporate Bonds the responsibility lies		M6: Adaptation started by 01/01/2022		⊠ 01/07/2021	
		on the Issuer, according to		M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY	
		the terms and conditions of the Issue officially published		M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY	
		within the prospectus.		M9: Internal testing complete by 02/12/2022		⊠ 01/01/2023	
				Testing and Implementation	Yes	No	n/a
				M10: External testing started by 05/12/2022		⊠ 31/12/2022	
				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		□ DD-MM-YYYY	
of the security must not have operational requirements stipulating that if the next business day would fall in the following month, the payment needs to be made in the same month (with the payment day being moved to precede the original payment date). Securities amount Securities amount data shall be				Analysis and Communication	Yes	No	n/a
data defined using nominal value for debt instruments (FAMT) and				M1: Analysis started by 30/06/2020		⊠ 01/07/2021	
units for non-debt instruments				M2: Initial communication by 01/03/2021		⊠ 31/03/2021	
(UNIT).		In the CSE system both		M3: Analysis completed by 31/07/2021		⊠ 31/12/2021	
		debt and non-debt instruments are defined in		M4: Documentation completed by 31/12/2021		⊠ 31/01/2022	
		units. Face amounts are		M5: Detailed external communication by 31/12/2021		⊠ 28/02/2022	
		currently in 3 dp. It may be 0,01 euro. Changes to the	Changes in the	Internal Adaptation	Yes	No	n/a
	Adaptation	CSD System will be required. After investigation	Cyprus law may be required,	M6: Adaptation started by 01/01/2022		⊠ 01/07/2021	
7	Required	the CSE clarifies that the	which is a more	M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY	
		current ISINs which will continue after Nov. 2022 are	complicated and difficult process.	M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY	
		4 for Government Bonds and 8 for Corporate Bonds.		M9: Internal testing complete by 02/12/2022		⊠ 01/01/2023	
		The CSE will aim to redefine		Testing and Implementation	Yes	No	n/a
		these ISINs in nominal value.		M10: External testing started by 05/12/2022		⊠ 31/12/2022	
				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		□ DD-MM-YYYY	

	AMI-	SeCo Standard		Feasibility Assessment		Implementation Mileston	es		
No.	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of t	he folk	owing activities:	
	data is consistent usa UNIT for equities. The	ractice for defining securities amount age of FAMT for debt instruments and is Standard builds upon the standard in T2S markets and which should be opean basis.							
	Payment time	Corporate action cash proceeds shall be distributed as early as possible, but no later than 12 noon, on the corporate action payment date. For any corporate action event involving a partial or full redemption, the cash proceeds should be made available by the Issuer CSD at the same time as the processing of the partial or full redemption on		An overview of the information flow that it is currently applied in Cyprus jurisdiction in relation to Standard 8 'Payment time' for government bonds is depicted below: T = The Issuer of the Bond notifies the CSE and Investors, via a public					
	the payment date so that relevant parties are compensated/paid in a timely fashion for the partial or full redemption.		announcement, regarding the Interest Payment. The		Analysis and Communication	Yes	No	n/a	
		Announcem on the CSE	Announcement is published		M1: Analysis started by 30/06/2020		⊠ 01/07/2021		
			on the CSE web site and includes: the Record date,		M2: Initial communication by 01/03/2021		⊠ 31/03/2021		
			interest rate, payment		M3: Analysis completed by 31/07/2021		⊠ 31/12/2021		
				amount and the payment date, T+8 to T+10 Record date =		M4: Documentation completed by 31/12/2021		⊠ 31/01/2022	
						M5: Detailed external communication by 31/12/2021		⊠ 28/02/2022	
			Adaptation	According to the procedure		Internal Adaptation	Yes	No	n/a
8			Required	followed by the Public Debt Management Office the		M6: Adaptation started by 01/01/2022		⊠ 01/07/2021	
				Record date precedes 5-7		M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY	
				days of the Payment date.		M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY	
				T+11 to T+13 = The day after the Record date the		M9: Internal testing complete by 02/12/2022		⊠ 01/01/2023	
				CSE needs one to three		Testing and Implementation	Yes	No	n/a
				days to carry out all necessary checks regarding		M10: External testing started by 05/12/2022		⊠ 31/12/2022	
				payment instructions i.e		M11: Final external communication by 01/04/2023		☐ DD-MM-YYYY	
				Bank account number to be credited (as provided by the		M12: External testing completed by 13/10/2023		□ DD-MM-YYYY	
				Investors), tax deductions		M13: Standard implemented by 20/11/2023		□ DD-MM-YYYY	
		according to domicile as provided by the Investors (as verified by the Government Tax authorities). The CSE submits to the Public Debt Management Office the relevant electronic files.							

	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:
				The CSE via electronic files also informs Operators/Members, designated by investors to collect the interest on their behalf, informing them of the cash to be debited in their Bank account.		
				T+15 = The Treasury of the Republic of Cyprus proceeds within 1-2 days from the date of receiving the files from CSE to cash distribution, through Central Bank of Cyprus via SEPA and/or Target 2, according to the above information. The instructions to Central Bank of Cyprus include both payment date and value date.		
				For Corporate Bonds the Record date is determined according to the terms and conditions of the Bonds. Usually as a market practice the Record Date is 10-15 days prior to the Payment date. Also we would like to mention that for Corporate Bonds the CSD provides to the Issuer the day after the Record Date, the Registry which identifies the beneficiary holders who are entitle to receive Interest. The Issuer is responsible for the cash payment of the Interest, for the maintenance of the instructions payment and the Tax deductions		
	Payment time for government bonds	For government bonds issued in domestic CSDs cash proceeds are paid no later than open for business of the payment system (i.e. 07:00 for TARGET2).	Adaptation Required	Changes are required by both Issuers and CSD in order to ensure that the cash proceeds for government bonds are paid no later than 7:00 CET.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.	

	AMI-S	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 th	e follo	wing activities:	
	Payment time for corporate bonds	For corporate bonds, the current minimum requirement is that cash proceeds be distributed no later than noon in the time zone of the Issuer CSD (consistent with existing CAJWG Standards). In line with recent improvements in market infrastructure in Europe (e.g. through the introduction of T2S) there are opportunities to improve the current latest time by which payments should be made with a latest cut-off time of 10:30 already feasible in many markets.	Adaptation Required	Changes are required by both Issuers and CSD in order to ensure that the cash proceeds for corporate bonds are paid no later than 10:30 CET.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect. Changes on Ministry of Finance procedures may be also required.				
	Notification of processing status	In the event that an issuer, issuer agent, or Issuer CSD cannot				Analysis and Communication	Yes	No	n/a
	processing status	process a Corporate Action on the				M1: Analysis started by 30/06/2020		⊠ 01/07/2021	
	previously announced Payment Date, then all Account Servicers shall inform Account Owners about the delay as soon as possible and based on					M2: Initial communication by 01/03/2021		⊠ 31/03/2021	
				The CSD's legal	M3: Analysis completed by 31/07/2021		⊠ 31/12/2021		
					M4: Documentation completed by 31/12/2021		⊠ 31/01/2022		
		information received from higher up the custody chain.		At the current juncture, the Issuer or the Issuer CSD are responsible for informing the Account Owners via mail or Announcement. The CSD	framework needs to be	M5: Detailed external communication by 31/12/2021		⊠ 28/02/2022	
					adapted. This needs the approval of the CSE's Council, which is rather a straightforward	Internal Adaptation	Yes	No	n/a
9			Adaptation Required			M6: Adaptation started by 01/01/2022		⊠ 01/07/2021	
9						M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY	
				will implement ISO 20022		M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY	
				messaging.	process with immediate	M9: Internal testing complete by 02/12/2022		⊠ 01/01/2023	
					effect.	Testing and Implementation	Yes	No	n/a
						M10: External testing started by 05/12/2022		⊠ 31/12/2022	
						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		□ DD-MM-YYYY	
	previously announced respective agents sha information to the Issi in the processing of the message containing to mandatory basis from Intermediaries shall p	ation cannot be processed on the at Payment Date. Issuers and their all be responsible for providing user CSD on the reasons for the delay the Corporate Action. A notification his information shall be provided on a the Issuer CSD to its clients. The asson the notification message thain to ensure all impacted parties are							

	AMI-SeCo Standard			Feasibility Assessment		Implementation Milestones			
) .	Name of Standard	Standard	Adaptation Required?	Description of Changes Required	Legal Barrier Identified?	Please indicate the expected date of completion of the	ne follo	owing activities:	
	Blocking of	ocking of For all Mandatory with Choice and				Analysis and Communication	Yes	No	n/a
	securities Voluntary CA events involving a debit of securities, the Issuer CSD and all relevant intermediaries				M1: Analysis started by 30/06/2020		⊠ 01/07/2021		
					M2: Initial communication by 01/03/2021		⊠ 31/03/2021		
		shall ensure that the elected security position is subject to				M3: Analysis completed by 31/07/2021		⊠ 31/12/2021	
		blocking.			The CSD's legal	M4: Documentation completed by 31/12/2021		⊠ 31/01/2022	
					framework needs to be	M5: Detailed external communication by 31/12/2021		⊠ 28/02/2022	
					adapted. This	Internal Adaptation	Yes	No	n/a
			Adaptation	The current juncture does	needs the approval of the	M6: Adaptation started by 01/01/2022		⊠ 01/07/2021	
0			Required	not require the blocking of securities.	CSE's Council,	M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY	
					which is rather a straightforward	M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY	
					process with immediate	M9: Internal testing complete by 02/12/2022		⊠ 01/01/2023	
					effect.	Testing and Implementation	Yes	No	n/a
						M10: External testing started by 05/12/2022		⊠ 31/12/2022	
						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		□ DD-MM-YYYY	
-	Underlying Securities Intermediaries. Accordant Accordant Servicers such account Servicers such accordant such ac	l accounting-wise from non-elected as by the (I)CSD and all ordingly there shall be a A events where participation g of securities (blocking refers to a ich an investor's securities are g accessed). On this basis, shall include an indicator in the CA a to identify if a security position follow-the-Issuer CSD" principle as should take place when the a met simultaneously: iticipation type is either Mandatory or Voluntary (VOLU) in a debit of a security position instruments, the following CA on combinations are subject to							
-	BIDS	VOLU							
			N/A	N/A	No				
	BPUT	VOLU	N/A	N/A	No				
	CERT	CHOS	N/A	N/A	N/A				
	CONS	VOLU	N/A	N/A	N/A				

	AMI-S	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	ne follo	owing activities:	
	DSCL	VOLU	N/A	N/A	N/A				
	DTCH	VOLU	N/A	N/A	N/A				
	EXOF	VOLU	Adaptation Required	The current juncture does not require the blocking of securities. Nevertherless the CSE will aim to comply with the standards with technical changes to the system eg where the CSE will oversee the procedure of blocking which will take place the participation of the Custodians / Investment Firms. (Blocking already exists for some corporate actions)	Most probably, this adaptation will not lead to any legal barrier, however				
		CHOS	Adaptation Required	The current juncture does not require the blocking of securities. Nevertherless the CSE will aim to comply with the standards with technical changes to the system eg where the CSE will oversee the procedure of blocking which will take place the participation of the Custodians / Investment Firms. (Blocking already exists for some corporate actions)	a more detailed assessment will follow to confirm this view.				
	EXTM	CHOS	N/A	N/A	N/A				
	INTR	CHOS	N/A	N/A	N/A				
	LIQU	CHOS	N/A	N/A	N/A				
	MCAL	CHOS	N/A	N/A					
	OTHR	CHOS	N/A	N/A					
	•	VOLU	N/A	N/A	N/A				
	REDM	CHOS	N/A	N/A					
	TEND	VOLU	N/A	N/A					
	Availability of default options	Account Servicers shall ensure that a Corporate Action event notification message identifies the default option for that event.		Most debt instruments in Cyprus jurisdiction do not	Most probably, this adaptation will not lead to	Analysis and Communication M1: Analysis started by 30/06/2020	Yes	⊠ 01/07/2021	n/a
		and the state of t	Adaptation	bear default option. Please	any legal	M2: Initial communication by 01/03/2021		⊠ 31/03/2021	
11			Required	note that for any new issues if a default option occur the	barrier, however a more detailed	M3: Analysis completed by 31/07/2021		⊠ 31/12/2021	
				CSE will identify this	assessment will	M4: Documentation completed by 31/12/2021		⊠ 31/01/2022	
				through the message.	follow to confirm this.	M5: Detailed external communication by 31/12/2021	U Vaa	⊠ 28/02/2022	
						Internal Adaptation	Yes	No	n/a

	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 t	he folk	owing activities:	
					M6: Adaptation started by 01/01/2022		⊠ 01/07/2021	
					M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY	
					M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY	
					M9: Internal testing complete by 02/12/2022		⊠ 01/01/2023	
					Testing and Implementation	Yes	No	n/a
					M10: External testing started by 05/12/2022		⊠ 31/12/2022	
					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		□ DD-MM-YYYY	
	events that have more than one option. The default option as identified by the Issuer CSD must be transmitted unchanged through the custody chain. Handling of fees All fees (e.g. solicitation fees, for meeting consent fees) to be credited /				Analysis and Communication	Yes	No	n/a
	related CA events debited as a result of participation in an event shall be confirmed via a CA confirmation message.	on .			M1: Analysis started by 30/06/2020		☐ DD-MM-YYYY	
		a			M2: Initial communication by 01/03/2021		☐ DD-MM-YYYY	
					M3: Analysis completed by 31/07/2021		□ DD-MM-YYYY	
			According to the Registar of		M4: Documentation completed by 31/12/2021		☐ DD-MM-YYYY	
					M5: Detailed external communication by 31/12/2021		☐ DD-MM-YYYY	
			Companies, there is not any provision in the Companies		Internal Adaptation	Yes	No	n/a
12		N/A	Law for charging handling		M6: Adaptation started by 01/01/2022		☐ DD-MM-YYYY	
12		14//	fees and as a result no relevant registrations have		M7: Adaptation completed by 30/06/2022		☐ DD-MM-YYYY	
			been notified to the		M8: Internal testing started by 01/07/2022		☐ DD-MM-YYYY	
			Department.		M9: Internal testing complete by 02/12/2022		☐ 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		□ DD-MM-YYYY	
	Account Servicers should support harmonised procedure for the handling of solicitation fees and consent fees accrued as a result of participation in a meeting related event, which shall be confirmed via a CA Confirmation message.							
	Reversal of CA A pre-advice message shall be	al .	At the current juncture, in	The CSD's legal	Analysis and Communication	Yes	No	n/a
13	of a CA. In case of a cash	issued in advance of any reversal Cases of cash reversals framework	M1: Analysis started by 30/06/2020		⊠ 01/07/2021			
	reversal, the pre-advice shall be sent sufficiently in advance of t	· ·	the Investor or the Custodian with the issuer.	adapted. This needs the	M2: Initial communication by 01/03/2021		⊠ 31/03/2021	

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	ne follo	owing activities:		
		reversal so that recipients have adequate time for cash		The CSD will implement ISO 20022 messaging.	approval of the CSE's Council,	M3: Analysis completed by 31/07/2021		⊠ 31/12/2021		
		management.		In case of a cash reversal,	which is rather a straightforward	M4: Documentation completed by 31/12/2021		⊠ 31/01/2022		
				the pre-advice shall be sent sufficiently in advance of the		M5: Detailed external communication by 31/12/2021		⊠ 28/02/2022		
				reversal so that recipients	immediate	Internal Adaptation	Yes	No	n/a	
				have adequate time for cash management. In case the reversal is triggered by the Public Debt Management Office (PDMO), PDMO will send to CSE a reversal	effect.	M6: Adaptation started by 01/01/2022		⊠ 01/07/2021		
						M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY		
						M8: Internal testing started by 01/07/2022		☐ DD-MM-YYYY		
						M9: Internal testing complete by 02/12/2022		⊠ 01/01/2023		
				announcement in sufficient		Testing and Implementation	Yes	No	n/a	
				time before the reversal takes place. The		M10: External testing started by 05/12/2022		⊠ 31/12/2022		
				announcement will include		M11: Final external communication by 01/04/2023		□ DD-MM-YYYY		
				the information needed according to the related		M12: External testing completed by 13/10/2023		□ DD-MM-YYYY		
				standard. The current procedure does		M13: Standard implemented by 20/11/2023		□ DD-MM-YYYY		
	before the reversal is	shall send a reversal announcement processed to allow the recipient of the t time to pre-fund the reversal of the		by the Account Servicer to the relevant parties.						
		tame to pre-tail the reversal of the he reversal takes place. To process payment in currencies				Analysis and Communication	Yes	No	n/a	
	foreign currency	not eligible in the settlement				M1: Analysis started by 30/06/2020		⊠ 01/07/2021		
	CA payments	system, the CSD must instruct the cash correspondent to debit the			M2: Initial communication by 01/03/2021		⊠ 31/03/2021			
		M3: Analysis completed by M4: Documentation completed by M6: D				M3: Analysis completed by 31/07/2021		⊠ 31/12/2021		
						M4: Documentation completed by 31/12/2021		⊠ 31/01/2022		
						M5: Detailed external communication by 31/12/2021		⊠ 28/02/2022		
			·	Yes	No	n/a				
			have foreign currency		M6: Adaptation started by 01/01/2022		⊠ 01/07/2021			
14	been transferred successfully. N/A	payments. No instruments in a foreign currency are	N/A	M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY				
		offered by the CSD.		M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY				
				M9: Internal testing complete by 02/12/2022		⊠ 01/01/2023				
						Testing and Implementation	Yes	No	n/a	
						M10: External testing started by 05/12/2022		⊠ 31/12/2022		
							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		□ DD-MM-YYYY		

	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:		owing activities:	
	currency not eligible in should put in a place currency.	urities paying cash proceeds in a note that the settlement system, the CSD a process to handle payments in that							
	ISO 20022 messages for	Account Servicers shall have the capability to support ISO 20022				Analysis and Communication	Yes	No	n/a
	corporate actions	messages for the processing of				M1: Analysis started by 30/06/2020		⊠ 01/07/2021	
		corporate actions.				M2: Initial communication by 01/03/2021		⊠ 31/03/2021	
						M3: Analysis completed by 31/07/2021		⊠ 31/12/2021	
						M4: Documentation completed by 31/12/2021		⊠ 31/01/2022	
						M5: Detailed external communication by 31/12/2021		⊠ 28/02/2022	
						Internal Adaptation	Yes	No	n/a
						M6: Adaptation started by 01/01/2022		⊠ 01/07/2021	
15						M7: Adaptation completed by 30/06/2022		□ DD-MM-YYYY	
						M8: Internal testing started by 01/07/2022		□ DD-MM-YYYY	
						M9: Internal testing complete by 02/12/2022		⊠ 01/01/2023	
						Testing and Implementation	Yes	No	n/a
						M10: External testing started by 05/12/2022		⊠ 31/12/2022	
						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		□ DD-MM-YYYY	
	Message Name	Message Identifier							
	Corporate Action Notification	seev.031	Adaptation Required						
	Corporate Action Event Processing Status Advice	seev.032	Adaptation Required						
	Corporate Action Instruction	seev.033	Adaptation Required	The CSD will implement ISO 20022 messaging.	The CSD's legal				
	Corporate Action Instruction Status Advice	seev.034	Adaptation Required		framework needs to be adapted. This				
	Corporate Action Movement Preliminary Advice	seev.035	Adaptation Required		needs the approval of the CSE's Council,				
	Corporate Action Movement Confirmation	seev.036	Adaptation Required		which is rather a straightforward process with immediate				
	Corporate Action Movement Reversal Advice	seev.037	Adaptation Required		effect.				
	Corporate Action Cancellation Advice	seev.039	Adaptation Required						
	Corporate Action Instruction	seev.040	Adaptation Required						

	AMI-S	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:		
	Cancellation Request							
	Corporate Action Instruction Cancellation Request Status Advice	seev.041	Adaptation Required					
	Corporate Action Instruction Statement Report	seev.042	Adaptation Required					
	Corporate Action Movement Preliminary Advice Cancellation Advice	seev.044	Adaptation Required					
	Meeting Notification	seev.001	Adaptation Required	May be covered during implementation of SRDII requirements.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.			
	Meeting Cancellation	seev.002	Adaptation Required	May be covered during implementation of SRDII requirements.	The CSD's legal framework needs to be adapted. This needs the approval of the CSE's Council, which is rather a straightforward process with immediate effect.			
	Meeting Entitlement Notification	seev.003	Adaptation Required		The CSD's legal			
	Meeting Instruction	seev.004	Adaptation Required		framework needs to be			
	Meeting Instruction Cancellation Request		Adaptation Required	May be covered during implementation of SRDII	adapted. This needs the approval of the CSE's Council,			
	Meeting Instruction Status	seev.006	Adaptation Required	requirements.	which is rather a			
	Meeting Vote Execution Confirmation	seev.007	Adaptation Required		straightforward process with immediate effect.			
	Meeting Result Dissemination	seev.008	Adaptation Required		511001.			