Target2-Securities Portfolio Transfer Market Practice

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I. <u>Executive Summary</u>

The European Working Group on Portfolio Transfers (EWGPT) was set up by the European Banking Federation (EBF) in November 2014 to recommend basic principles and best market practices to exchange information needed in a securities portfolio transfer in T2S, when the transfer occurs across accounts held in different CSDs. It published a first final draft proposal in June 2015 completed by further work to meet concerns raised by some national communities represented in the EBF, including the German Banking community.

Particular difficulties of the work resulted from:

- divergences of fiscal environments in the European landscape;
- differences between T2S ISO20022 messages and general ISO20022 settlement messages;
- differences between direct holding and indirect holding markets.

The recommendation has therefore been re-drafted, taking into account concerns that may occur in different T2S countries. This recommendation is in the form of a Market Practice dealing with portfolio transfers of securities deposited and settled in Book Entry form with an (I)CSD that has joined the T2S platform and covers all parties involved in the portfolio transfers i.e. CSDs and banks. The proposed Market Practice is focussed on portfolio transfers for securities held by retail clients, however the same recommendations may equally be applied in case of non-retail clients.

The Market Practice contains recommendations on how to populate settlement messages in the context of a portfolio transfer. It is based on the use of ISO 20022 formats in T2S for the exchange of settlement instructions and allegements between the delivering (alleging) and receiving (alleged) parties during a client portfolio transfer from a bank to another bank. Specific analysis has been made to define a workable methodology for the transfer of additional relevant information, such as beneficiary identifiers and historical fiscal prices, across accounts held in different CSDs within the T2S perimeter.

This Market Practice does not require the T2S markets to populate the transfer messages in the suggested formats, unless a specific market practice has been published by the relevant market. Banks and CSDs in countries facing the difficulties described further below in II. and III. should not be required to use or rely on the information provided according to this Market Practice; however, in these cases those same banks and CSDs that choose not to follow this Market Practice should endeavor to identify (if necessary on a bilateral basis) a workable process to facilitate the securities transfers that are being originated by banks or CSDs outside their domestic market.

 Taking into account the fact that T2S ISO 20022 messages (instruction and allegement), do not support a large amount of information needed, the EWGPT has built an immediate workaround solution based on the usage of the "Trade Identification" (for the information mainly related to the party and average value date) and the narrative "Party 4" (for the information mainly related to the security). No other alternatives have been identified to permit an immediate workable solution, however further analytical work will be useful in order to refine the initial recommendations of the EWGPT Market Practice, taking in account possibilities offered by standard ISO20022 settlement messages and assess if potential marginal enrichment of ISO standards will be needed.

II. Background

The Task Force on adaptation to Cross-CSD settlement in T2S (TFAX) found obstacles to passing portfolio transfer information in a Cross-CSD context in T2S, and formulated a recommendation that the information should be transferred outside of T2S. This recommendation was subsequently endorsed by the Advisory Group (AG) in March 2013.

Based on the Italian Community proposal and further analysis done on the possibility of passing portfolio transfer information in T2S, the XMAP agreed to recommend the HSG to remove the initial T2S standard for portfolio in T2S and confirmed the need to define standardised information requirement for portfolio transfers. This recommendation was accepted by HSG and the T2S AG.

In June 2014 the T2S AG therefore invited the European Banking Federation (EBF) involving other European industry associations to consider follow up actions regarding harmonised information requirements for portfolio transfers that have to be compatible with the T2S process of generating allegement messages.

In November 2014 the European Working Group on Portfolio Transfers (EWGPT) was set up on EBF demand to recommend basic principles and best market practices to exchange information needed in a Portfolio Transfer in T2S. A limited number of stakeholders representing the roles in the process of a portfolio transfer, a geographical spread across the EU and various sensibilities (Banks/custodians, CSD, European industry groups and SWIFT representative) constituted the EWGPT (please refer to list of members in appendix b).

The scope has been limited to retail client portfolio transfers of securities deposited and settled in Book Entry form with an (I)CSD in Europe having joined T2S platform and all parties involved in the portfolio transfers i.e. CSDs and banks. It has limited its work to portfolio transfers of a retail client moving his account from one bank to another.

The EWGPT aimed to define regional best market practices limited to the geographical perimeter of the T2S area with the intention to cover:

- descriptions and recommendations on the workflow and channel of information to use
- messages to be used
- data to be transmitted when available
- template of messages and way to populate messages

As a next step, these regional market practices were to be proposed to a broader audience.

The EWGPT worked in a step by step process asking accordingly for the support of format messaging specialists and using SMPG formalism.

The EWGPT gathered existing information about Portfolio transfers including the analyses done by Italian NUG, TFAX, XMAP groups and all relevant information available between its members and EBF ones.

Based on this documentation, the EWGPT identified common denominators and specificities in terms of data that are currently processed in the different countries of the T2S area and define best

market practices to be shared with T2S community. A first consultation for endorsement was issued during the summer 2015 where German community raised concerns due to its fiscal framework and consequences in terms of liabilities of banks accepting to receive a portfolio from another bank, more specifically when the delivering bank of the incoming client is a German bank. The EWGPT conducted several working sessions with German market representatives to deeper analyse the concern and potential effect of the Market Practice. The working sessions came to the conclusion that a further EBF consultation with data mapping exercise was to be conducted in April 2016 in order to ensure all T2S markets could provide their respective standards covering all information needed in a portfolio transfer.

Particular difficulties of the work resulted from

- divergences of fiscal environments in the European landscape
- differences between T2S ISO20022 messages and general ISO20022 settlement messages
- differences between direct holding and indirect holding market

A. Divergences of fiscal environments in the European landscape

- Great differences from one country to another in the set of data requested by tax law and administration for fiscal reporting purposes exist. For example, notion of prices of purchase are commonly requested for capital gains purposes, but the actual data to be transmitted vary from a detailed price per transaction and loss offsetting to a weighted average per year or per date of acquisition.
- Liabilities of banks in tax processing also differ. In some countries, the investor, i.e the client of the bank, is required to make his own tax statement, where the bank provides the tax related data as a service to the client whereas in other countries, the bank is required to transmit the tax related data to the receiving bank which is obliged to make correct capital gain tax calculations on the basis of the transmitted data when the transferred securities are sold. The German Income Tax Act (EStG), for instance, places such a responsibility upon domestic banks and require the receiving bank to use comprehensive data transmitted by the delivering bank for later taxation.. Furthermore, German banks are bound to data confidentiality regarding their clients' tax related data making it difficult to pass on such data through a chain of several intermediaries.

B. Differences between T2S ISO20022 messages and general ISO20022 messages

In the mapping exercise the EWGPT recognised that T2S settlement messages do not support all the information and flexibility offered by ISO20022 settlement messages. For instance, there is a limitation for repetitive sequences to detail prices, quantity and dates of a portfolio transfer in a T2S format which would not be the case under a full ISO20022 settlement message. Moreover, it was recognised that no corresponding data fields exist for some of the necessary tax related information (e.g. German market data requirements).

C Differences between direct holding and indirect holding market

In the case of direct holding markets, securities accounts at CSD level are opened in the name of the final beneficial owner and under the administration of a local bank. In some of the direct holding markets the concept of portfolio transfer does not exist itself as it relates to a change of administration (the bank) of CSD account.

This document will include in its final version some recommendations for further required steps such as the maintenance of these Best Market Practices and intend to share the result with a broader community.

This document will be sent to SMPG as a description of a regional Market practices with the aim of a further step to help the adoption of broader standards in the scope of portfolios transfers.

III. Scope and definitions:

A. Scope:

According to the actual process the industry is following market practice agreed in different steps and actually limited to pure domestic perimeter. Significant fragmentation and a plurality of systems, procedures are used by the participants involved in the process. This situation has been considered as a potential barrier to greater efficiency and competitiveness in the T2S environment. With the aim of avoiding said barrier, the EWGPT decided to put on paper the stratification of actual market practice in order to have a common reference for the benefit of CSD participants.

The scope of this document is to define and illustrate the use of ISO 20022 formats in T2S for the exchange of settlement instructions and allegement between the delivering (alleging) and receiving (alleged) parties during a client portfolio transfer from a bank to another bank. Client portfolio transfer is understood as a retail client portfolio transfer where a great number of lines may be exchanged and request, as a consequence, a close to straight through processing. In this context, cross-border means a retail client moving this portfolio from a bank in one country to a bank in another country.

The Market Practice shall be considered as a recommendation in the way to populate settlement message in portfolio transfer in a T2S context. In particular, this Market Practice does not require the T2S markets to populate the transfer messages in the suggested formats unless a specific market practice has been published by the relevant market. For some markets, it would not even be possible to populate the transfer message with all data needed due to the difficulties mentioned in I.B. above (example Germany). Under a same practical approach there would be no interest to use this Market Practice when a client changes his/her Bank in a domestic context with a direct holding model (example Finland).

Countries that are facing this kind of difficulties should not be required to use or rely on the information provided in these settlement messages in the case that other established means or (domestic) tools exist to exchange the information needed.

Countries that are not facing this kind of difficulties may use this Market Practice as a reference tool not only in a cross-border environment but also in a domestic "in border" portfolio transfer. The choice will depend on the local market approach in terms of full (for any T2S exchange) or partial (only cross-border) implementation of the Market Practice.

By exchange of settlement instructions, it is understood the providing, by the delivering account servicer to the receiving account servicer, of the appropriate settlement details (trade date, settlement date, delivering parties, place of settlement, etc) of the individual transfers for the full or partial portfolio transfer.

The purpose of this market practice is to revisit the current market process in order to guarantee a prompt booking without adding complexity and risks. In particular it has the objective to:

261	✓ guarantee continuity in terms of information, mapping these information in T2S messages
262	✓ set guidelines for the usage of transaction type and new fields required by T2S for the
263	proper identification and processing of the Portfolio transfer

✓ set guidelines in terms of process flow (including transmission of tax/beneficial owner information) and steps applicable to CSD participants

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This Market Practice requires a local description of how it is applied in the respective market. This description or any alternative tools /communication means / usage rules should be published by the market.

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B. Definitions:

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Term / Codeword	Definition
Portfolio transfers	A transfer of the Beneficial owner's securities from the delivering party to the receiving party. It covers mainly portfolio transfers without change of beneficial owner but can cover as well portfolio transfers with change of beneficial owner (donation for example)
Receiving/Delivering Party	A financial institution, which may participate to a CSD connected to T2S that holds (delivering party) / will hold (receiving party) beneficial owners' securities for safekeeping.
Beneficial owner	Client of the Delivering/Receiving party, beneficiary owner of the securities held/to be held with the Delivering /Receiving party.

IV. Actors and Roles:

This paragraph describes the roles and actors involved in the process described in the market practice document.

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	Actors an Roles definitions				
Description	Definition				
Instructing Party	An entity that is the originator of a settlement instruction either on its own behalf or on behalf of its clients. When acting on behalf of its client, the instructing party is considered to be the bank being in direct contact with the client ordering portfolio transfer.				
Delivering Party	An instructing party that delivers assets in a portfolio transfer.				
Receiving Party	An instructing party that receives assets in a portfolio transfer.				
Executing/Servicing Party	Party that process, monitor and report on transactions received from an instructing party.				
Global Settlement Agent	The party that holds another party's inventory of financial instruments, and effects or receives deliveries versus payment, or free of payment. Deliveries, receipts, and payments may be effected within the facilities of the global settlement agent, or within the facilities of a local settlement agent, and directed by the global settlement agent. A global settlement agent may be a custodian				
Local Settlement Agent	The party that holds a portion of another party's inventory of financial instruments within a location or market, effects or receives local deliveries versus payment, or free of payment, as directed by the global settlement agent. A local settlement agent may be a local custodian.				
Central Securities Depositories	A Central Securities Depositories is an entity as defined in article 2 (1) of REGULATION (EU) No 909/2014 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 23 July 2014				
Issuer CSD	An Issuer CSD is a CSD that provides initial recording of securities in a book-entry system ('notary service'); The issuer CSD opens accounts allowing investors (in a direct holding system) and/or intermediaries (including investor CSDs) to hold securities for which it provides initial recording of securities in a book-entry system ('notary service') for these securities.				
Investor CSD	A CSD that holds a security for which it is not the/an Issuer CSD. It holds these securities either directly or indirectly via one or more intermediaries at the/an Issuer CSD.				
Settlement Infrastructure	The technical platform that operates the settlement and reconciliation to its members for the settlement of transactions and holding of assets (e.g., T2S).				

The below matrix outlines, that the different business actors in the settlement process may have different roles in the process of settling a portfolio transfer. As a result, a given actor may have different roles at specific parts of the process.

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Roles Actors	Instructing Party	Executing/Servicing Party	Technical Securities Settlement Platform
Global Settlement Agent	х	Х	
Local Settlement Agent	х	Х	
Central Securities Depositories	х	Х	
Settlement Infrastructure			Х

T2S PORTFOLIO TRANSFER Note that:

V. Activity Diagram:

For the instruction and the allegement processes, the below typical activities can be described.

- there is not always an intermediary between the instructing party and the executing party
- there can be more than one intermediary between the instructing party and the executing party

Assumptions/prerequisites:

- The receiving party: The beneficial owner has opened an account at the receiving participant and requested the transfer of its portfolio from the delivering to the receiving party.
- The chain of delivering and receiving instructions depends on the number of intermediaries between the final client and the direct participant to the CSD using the T2S platform. To keep it simple the market practice will cater for the minimum number of parties in the settlement chain.
- The allegement message is subscribed by the respective parties.
- Instruction will be free of payment.
- Chain of executing/servicing parties carries all information able to be populated in the T2S settlement message according to this Market Practice recommendation and according to instruction given by the delivering party.

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Send Matching

Status

Send Settlement

Confirmation

Send Matching

Status

Send Settlement

Confirmation

Instruct

Update Receipt

Settle Receipt

Allege client



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Update Delivery

Settle Delivery

Send Matching

Status

Send Settlement

Confirmation

	Descriptions of the activities				
Receiving Party (Alleged Party)	Executing/Servicing Party	T2S	Executing/Servicing Party	Delivering Party	
Process allegement: Process the allegement received from the Executing/Servicing Party	Forward the allegement:	Generate the allegement: following the receipt of delivery instruction, an allegement is sent.	Process the instruction	Sending of the Instruction to deliver	
Portfolio transfer allegement or not: if the allegement refers to a portfolio transfer then check if the receiving party is the initiator of the receiving instruction, if not normal allegement process should be following and the receiving party should check if an instruction was already sent or not for this allegement					
Instruction sent or not: If an instruction has been sent, go to Investigate and contact counterparty. If NO, go to Initiator or not?					
Investigate and contact counterparty: Investigation of the issue and contact counterparty if needed.					
Initiator or not: If the Instructing Party is the initiator of the instruction, then instruct a receiving instruction. If not, allege client	Process the receiving instruction:	Processing and matching process: receiving instruction is matched with alleged instructions.			

		Go to remove allegement and send matching status		
Process allegement removal	Allegement removal is forwarded	Remove allegement: an allegment removal is sent out.		
Process matching status for the receiving instruction	Process and matching status for the receiving instruction and send it out	Send matching status: matching status is sent out	Process and matching status for the delivering instruction and send it out	Process matching status for the delivery instruction
Process the settlement confirmation for the receiving instruction	Process the settlement confirmations for the receiving instruction and send it out	Send settlement confirmation for the delivering and the receiving instruction	Process the settlement confirmations for the delivering instruction and send it out	Process the settlement confirmation for the delivering instruction

VI. Communication Flow:

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A communication flow describes the high level communication requirements a business process requires. It shows the typical exchanges of Messages in the context of a transaction.

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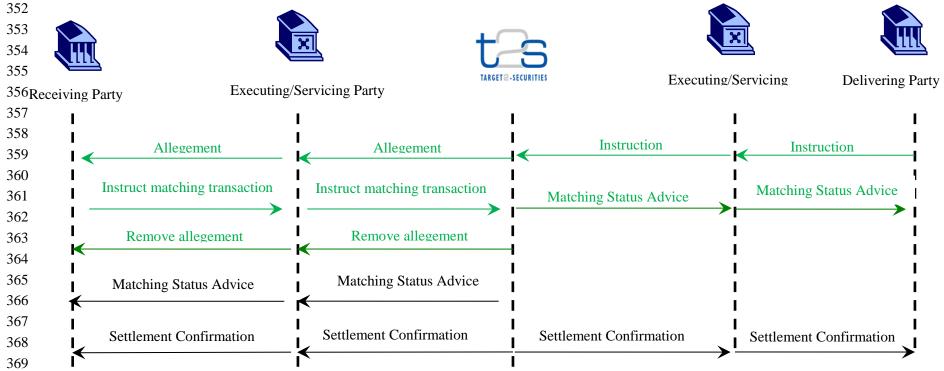
In green, the main communication requirements for this process.

349 In black, the surrounding communication requirements.

In dotted line, the optional/potential surrounding communication requirements.

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VII. Business Data Requirements:

Business data requirement section describes the business information that will be needed for the business process to take place

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Note: that the Mandatory/Optional column reflects what is recommended by the market practice and this can be different from the optionality in the message.

A. <u>Delivering instruction:</u>

Standard ISO 20022 settlement messages would permit to carry a large part of details needed in portfolio transfers. Considering the amount of information which is not supported by T2S ISO 20022 messages (instruction and allegement) the EWGPT has built a workaround solution based on the usage of the Trade Identification for the information related to the party and the average value date and, the Narrative Party 4, for the information related to the security. The EWGPT is fully aware that this workaround can be seen as inadequate however, no other alternatives have been identified to permit an immediate workable solution.

An appropriate Change Request to make T2S ISO20022 message closer to ISO20022 settlement message would permit to reduce significantly the usage of narrative field and would permit a clean use of ISO20022 fields in settlement message. Under a long term perspective, the EWGPT recommends the submission of the appropriate Change Request.

The document focuses on the current possibilities of ISO20022 T2S messages in respect with the scope of the EWGPT mandate.. A fully detailed description of this usage will be requested to local practitioners and should be maintained by a local correspondent body (NUG, banking association,...) such as description of way to populate field etc.

Business elements	M/O	Additional information	Supported by T2S	Short-term workaround
Transaction Identification	М		Υ	
Transaction Type	М	PORT – Portfolio Transfer	Υ	
Securities Movement type	М	The instruction is a delivery	Υ	
Payment indicator	М	The instruction is a free of payment	Υ	

Business elements	M/O	Additional information	Supported by T2S	Short-term workaround
Common Identification	М	Must be quoted to avoid risk of cross-matching. It should be unique at the CSD participant level.	Y	
Partial Settlement Indicator	М	Partial Settlement indicator must be set to no (NPAR)	Y	
Beneficial Ownership indicator	М	Beneficial Owner indicator will always be set to NO. Change request should be submitted to T2S.	N	Trade identification with code NCBO or YCBO
No Automatic Market Claim Indicator	M	No Automatic Market Claim Indicator should be included. The principle is to avoid any transfer of securities during a corporate actions processing on the considered line of securities. However should this occur, the delivering and receiving banks shall do all the necessary to apply proceeds correctly to the client having his line of portfolio transferred.	Y	
Investor Tax Regime Type (Tax Capacity Indicator)	Ο	Depending on the local market practices this provides the profile of the investor such as: IT local MP: Gestito, Amministrativo, Dichiarativo FR local MP: stock indicator Proprietary codes in the Tax Capacity indicator in Settlement Parameters can be used. To be supported by T2S, a CR should be submitted. If stock options are sold then specific statement to fiscal administration is required. This info could be located in Trade Details/Reporting with code Regulatory Organisation. If required a CR could be submitted to the SEG to support additional standards codes in the Tax Capacity Indicator.	N	This information will be located in Trade Identification as a one letter to be defined based on local MP.

Business elements	M/O	Additional information	Supported by T2S	Short-term workaround
Trade Date (instruction date)	М	ISO 8601 Date/Time - the trade date is when the delivering party instructs the portfolio transfer.	Y	
Settlement Date	М	ISO 8601 Date/Time	Y	
Total Quantity of Financial Instrument	М		Y	
Financial Instrument	М	ISO 6166 International Securities Identification Number [ISIN]. Description is optional.	Y	
Interest rate	0	Applies to global quantity. CR should be submitted to T2S to support interest rate.	N	Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name.
Quantity per average price	0	This will be on global quantity	Υ	
Average price	0	At global quantity level, this cannot be mapped to deal price as both could be present. Average price of the capital gain is related to the activity and not the financial instrument. It is the historical average price and it represents the cost of portfolio transfer. Therefore a CR should be submitted to the SEG to include this average price at the same level as the deal price.	N	Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name.
Date of purchase	0	This will be located in quantity breakdown currently not supported by T2S. CR should be submitted to T2S to support the quantity breakdown the Lot Date and Time		Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name
Date of registration one date per occurrence – (FR MP)	0	Today there is no way to distinguish the type of lot date. Maybe a Type of Date could be added (through CR to the SEG) but this will imply that other markets than FR require such a specification, otherwise a workaround will have to be used like narrative in trade details Settlement Instruction Processing Additional Detail.	N	Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name

Business elements	M/O	Additional information	Supported by T2S	Short-term workaround
NAV	0	This information could be mapped to the Indicative Price which currently not supported by T2S. A CR should be submitted to T2S to support this information.	N	Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name
Deal Price	0	Purchase price expressed in amount and currency for shares, rate for bonds.	Υ	
Accrued Interest Amount	0	Currency and amount (addition of all interests, when you sell some securities like bonds difference of accrued interest, calculates addition of interest running on the bonds). Present in Other Amounts. CR should be submitted to T2S to support Accrued Interests in the sese.028	y in the sese.023 but not in the	Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name
Average Value Date	0	CR should be submitted to the SEG to include this information in the Financial Instrument Attributes.	N	Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name
Safekeeping Account to be credited or debited and name		The safekeeping account of the final client (meaning the retail investor) in the books of the end bank being in direct contact with him.		

Business elements	M/O	Additional information	Supported by T2S	Short-term workaround
Additional fiscal details to be filled according to the securities type and fiscal attributes related to the beneficial owner. Information related to the fiscal regime, it is not a fiscal type, should be another indicator		Currently this information cannot be included is ISO 20022. CR will have to be submitted to the SEG to include specific codes at the Tax Capacity Indicator Level or to create another indicator.		Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name
Number of UCITS units	0	Number of the units in the fund. A CR should be submitted to the SEG to include this info at the Financial Instrument Attributes level as this information is related to the security.		Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name
Receiving Depository (i.e. receiving CSD)	M	ISO 9362 Bank Identifier Codes [BIC] taken from the list of PSET's BIC published on www.smpg.info . See also. Receiving /Delivering Depository – PSET and PSAF MP		
Receiving CSD Participant	M	ISO 9362 Bank Identifier Codes [BIC] + the processing identification (O)	Y	

Business elements	M/O	Additional information	Supported by T2S	Short-term workaround
Receiving CSD Participant account	0		Y	
Receiving CSD Participant's Client	0	ISO 9362 Bank Identifier Codes [BIC] + the processing identification (O)	Y	
Receiving CSD Participant's Client's account	O		Y	
Contact details at client CSD participant	0	Additional information on sender's such as name and address, tel, fax and e-mail. This information can be located at the appropriate party level in the Additional Information/Party Contact Details		
Final Beneficiary (could be receiving CSD participant's client) or Party 3. and account. (PARTY 3) not in the flow at the moment+	0	ISO 9362 Bank Identifier Codes [BIC]	Υ	
Additional Settlement Parties (party 4 and 5)	0	Additional settlement parties are optional based on local market Practice. Not required by T2S but still passed on the sese.028.(*)	Y	

Business elements	M/O	Additional information	Supported by T2S	Short-term workaround
Delivering CSD Participant	М	ISO 9362 Bank Identifier Codes [BIC] + the processing identification (O)	Υ	
Delivering CSD Participant account	0		Y	
Delivering CSD Participant's Client	М	ISO 9362 Bank Identifier Codes [BIC] + the processing identification (O)	Y	
Delivering CSD Participant's Client's Account	0		Y	
Delivering CSD Participant's Client contact details	0	Additional information on sender's such as name and address, tel, fax and e-mail. This information can be located at the appropriate party level in the Additional Information/Party Contact Details		
Final delivering party (could be delivering CSD participant's client) or party 3)	0	ISO 9362 Bank Identifier Codes [BIC]. The Final delivering party is the bank which delivers securities following instruction from its client.	Υ	

Business elements	M/O	Additional information	Supported by T2S	Short-term workaround
An indicator to mention that the information sent by the delivering party is considered as being reliable.	Ο	This indicator means that the information as been calculated or determined by the delivering party meaning that it is confident about the accuracy of it. In some cases information could come from the client or another bank where the investors' securities were formerly held. This information is currently not available on ISO 20022. Potentially could be located in Trade Transaction Condition. In the meantime the workaround would be to use in SettlementParameters/SettlementTransactionCondition/Proprietary but T2S does not support proprietary option. If users needs this proprietary format to be supported by T2S a CR should be submitted to T2S bodies accordingly. A CR could potentially be submitted to the SEG to have a standard code should this requirement be common to several markets.		As proprietary format is not supported in T2S. Information should be included in Trade Identification
Price for Residual Capital Gain purposes	0	This information is currently not available in ISO 20022. A CR should be submitted to the SEG to include this information at the Trade Details level.		Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name
Distributor of funds or institutional investor (BIC).	Ο	Distributor of funds or institutional investor (BIC). Use of Other parties party INVE for both. Should an additional code or change of definition be required to cater for Funds distribution more specifically, this will be taken into account later. If a BIC does not exist then a bilateral code will be used. The idea is to permit for intermediaries to comply with recommendation of EFAMA's "fund processing standardization group". Note Other Parties are not supported in the sese.028 a CR should be submitted to the ECB.	N	As Other Parties are supported in the sese.023 but not in the sese.028. Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name.

Business elements	M/O	Additional information	Supported by T2S	Short-term workaround
2 levels , distributor of a fund of a fund same thing so transparent from that perspective		2 levels , funds of funds. Use of Other Parties party INVE for both. The delivering party will instruct either level 1 or 2 so no need to have the Investor code to be repetitive.	N	As Other Parties are supported in the sese.023 but not in the sese.028. Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name

^(*) If the use of those party fields becomes mandatory, the Market Practice will need to be revised.

Information separator "/"

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Detailed format specification for Trade Identification 393 394 The field < TradId> is a mandatory field of the block < TradDtls> : 395 396 <TradDtls> <TradId> 397 398 399 < Tradid> can have a maximum of 16 characters, the example below shows how the information should be structured: 400 Tax Capacity/Change of Beneficial Ownership/Reliability of Delivering Party/Average Value Date 401 NCBO or YCBO Y or N indicator DDMMYYYY One letter choice to be define based on local MP 402 403 Tax Capacity Indicator 404 Change of Beneficial Ownership 405 Reliability of Delivering Party Indicator 406 Average Value Date

Data or information should be populated with "0" (meaning zero(s)) respecting the number of characters for this field if such information is not required or not available. Example if Tax Capacity is not necessary "0" will be included if Average Value Date is not needed, then "00000000" should be filled in.

413	Detailed format s	pecification for Receiving Settlement Party 4
414		
415	If there is the nee	ed to complete the set of information with specific fiscal details the following rules need to be applied respecting the orde
416		the less important level of information MP based:
417	<rcv< td=""><td>vgSttImPties></td></rcv<>	vgSttImPties>
418	<pty-< td=""><td><i>4></i></td></pty-<>	<i>4></i>
419	<id><</id>	<nmandadr> <nm></nm></nmandadr>
420		
421	✓	Price for Capital Gain Purposes
422	✓	Interest Rate
423	✓	Average Price
424	✓	NAV
425	✓	Date of Purchase
426	✓	Date of Registration
427	✓	Average Value Date
428	✓	Fiscal attributes
429	✓	UCITS quantity and residual capital gain
430	✓	Accrued Interest Amount
431	✓	Distributor of fund or of funds of funds (level 1 or 2) BIC or Local proprietary code if BIC is not available
432	✓	Information Separator "/"
433		
434		
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B. <u>Allegement Notification:</u>

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See Appendix in Section VII-A "Matching Fields inT2Ss" for detailed understanding of the content of the allegement message.

Business elements	M/O	Additional Information	Supported by T2S	Short-Term workaround
Allegement Transaction Identification	М		Y	
Transaction Type	M	PORT – Portfolio Transfer	Y	
Securities Movement type	М	The instruction is a delivery	Y	
Payment indicator	М	The instruction is a free of payment	Y	
Common Identification	М	Must be quoted to avoid risk of cross-matching. It should be unique at the CSD participant level.	Y	
Partial Settlement Indicator	М	Partial Settlement indicator must be set to no (NPAR)	Y	
Beneficial Ownership indicator	M	Beneficial Owner indicator will always be set to NO. Change request should be submitted to T2S.	N	Trade identification with code NCBO or YCBO
No Automatic Market Claim Indicator	М	No Automatic Market Claim Indicator should be included. The principle is to avoid any transfer of securities during a corporate actions processing on the considered line of securities. However should this occur, the delivering and receiving banks shall do all the necessary to apply proceeds correctly to the client having his line of portfolio transferred.	Y	

Business elements	M/O	Additional Information	Supported by T2S	Short-Term workaround
Investor Tax Regime Type (Tax Capacity Indicator)	Ο	Depending on the local market practices this provides the profile of the investor such as: IT local MP: Gestito, Amministrativo, Dichiarativo FR local MP: stock indicator Proprietary codes in the Tax Capacity indicator in Settlement Parameters can be used. To be supported by T2S, a CR should be submitted. If stock options are sold then specific statement to fiscal administration is required. This info could be located in Trade Details/Reporting with code Regulatory Organisation. If required a CR could be submitted to the SEG to support additional standards codes in the Tax Capacity Indicator.	N	This information will be located in Trade Identification as a one letter to be defined based on local MP.
Trade Date (instruction date)	М	ISO 8601 Date/Time - the trade date is when the delivering party instructs the portfolio transfer.	Y	
Settlement Date	M	ISO 8601 Date/Time	Y	
Total Quantity of Financial Instrument	М		Y	
Financial Instrument	М	ISO 6166 International Securities Identification Number [ISIN]. Description is optional.	Y	
Interest rate	Ο	Applies to global quantity. CR should be submitted to T2S to support interest rate.	N	Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name.

Business elements	M/O	Additional Information	Supported by T2S	Short-Term workaround
Quantity per average price	0	This will be on global quantity	Y	
Average price	Ο	At global quantity level, this cannot be mapped to deal price as both could be present. Average price of the capital gain is related to the activity and not the financial instrument. It is the historical average price and it represents the cost of portfolio transfer. Therefore a CR should be submitted to the SEG to include this average price at the same level as the deal price.	N	Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name.
Date of purchase	0	This will be located in quantity breakdown currently not supported by T2S. CR should be submitted to T2S to support in the quantity breakdown the Lot Date and Time		Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Na me
Date of registration one date per occurrence – (FR MP)	0	Today there is no way to distinguish the type of lot date. Maybe a Type of Date could be added (through CR to the SEG) but this will imply that other markets than FR require such a specification, otherwise a workaround will have to be used like narrative in trade details Settlement Instruction Processing Additional Detail.	N	Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name
NAV	0	This information could be mapped to the Indicative Price which currently not supported by T2S. A CR should be submitted to T2S to support this information.		Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name
Deal Price	0	Purchase price expressed in amount and currency for shares, rate for bonds.	Y	

Business elements	M/O	Additional Information	Supported by T2S	Short-Term workaround
Accrued Interest Amount	0	Currency and amount (addition of all interests, when you sell some securities like bonds difference of accrued interest, calculates addition of interest running on the bonds). Present in Other Amounts. CR should be submitted to T2S to support Accrued Interests in the sese.028	Y in the sese.023 but not in the	Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name
Average Value Date	Ο	CR should be submitted to the SEG to include this information in the Financial Instrument Attributes.	N	Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name
Safekeeping Account to be credited or debited and name		The safekeeping account of the final client (meaning the retail investor) in the books of the end bank being in direct contact with him.		
Additional fiscal details to be filled according to the securities type and fiscal attributes related to the beneficial owner. Information related to the fiscal regime, it is not a fiscal type, should be another indicator		Currently this information cannot be included is ISO 20022. CR will have to be submitted to the SEG to include specific codes at the Tax Capacity Indicator Level or to create another indicator.		Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name

Business elements	M/O	Additional Information	Supported by T2S	Short-Term workaround
Number of UCITS units	Ο	Number of the units in the fund. A CR should be submitted to the SEG to include this info at the Financial Instrument Attributes level as this information is related to the security.	N	Information will be located in the counterparty Settlement Party 4 /Identification NameAndAddress/Name
Receiving Depository (i.e. receiving CSD)	М	ISO 9362 Bank Identifier Codes [BIC] taken from the list of PSET's BIC published on www.smpg.info . See also. Receiving /Delivering Depository – PSET and PSAF MP		
Receiving CSD Participant	М	ISO 9362 Bank Identifier Codes [BIC] + the processing identification (O)	Y	
Receiving CSD Participant account	0		Y	
Receiving CSD Participant's Client	0	ISO 9362 Bank Identifier Codes [BIC] + the processing identification (O)	Υ	
Receiving CSD Participant's Client's account	0		Y	
Contact details at client CSD participant	0	Additional information on sender's such as name and address, tel, fax and e-mail. This information can be located at the appropriate party level in the Additional Information/Party Contact Details	V	
Final Beneficiary (could be receiving CSD participant's client) or Party 3. and account. (PARTY 3) not in the flow at the moment+	Ο	ISO 9362 Bank Identifier Codes [BIC]	Y	

Business elements	M/O	Additional Information	Supported by T2S	Short-Term workaround
Additional Settlement Parties (party 4 and 5)	0	Additional settlement parties are optional based on local market Practice. Not required by T2S but still passed on the sese.028.	Y	
Delivering CSD Participant	М	ISO 9362 Bank Identifier Codes [BIC] + the processing identification (O)	Y	
Delivering CSD Participant account	0		Υ	
Delivering CSD Participant's Client	М	ISO 9362 Bank Identifier Codes [BIC] + the processing identification (O)	Y	
Delivering CSD Participant's Client's Account	0		Y	
Delivering CSD Participant's Client contact details	0	Additional information on sender's such as name and address, tel, fax and e-mail. This information can be located at the appropriate party level in the Additional Information/Party Contact Details	Y	
Final delivering party (could be delivering CSD participant's client) or party 3)		ISO 9362 Bank Identifier Codes [BIC]	Y	

Business elements	M/O	Additional Information	Supported by T2S	Short-Term workaround
An indicator to mention that the information sent by the delivering party is considered as being reliable.	0	This indicator means that the information as been calculated or determined by the delivering party meaning that it is confident about the accuracy of it. In some cases information could come from the client or another bank where the investors' securities were formerly held. This information is currently not available on ISO 20022. Potentially could be located in Trade Transaction Condition. In the meantime the workaround would be to use in SettlementParameters/SettlementTransactionCondition/Pro prietary but T2S does not support proprietary option. A CR should be submitted to T2S to support proprietary format. A CR could potentially be submitted to the SEG to have a standard code should this requirement be common to several markets.	Z	As proprietary format is not supported in T2S. Information should be included in Trade Identification
Price for Residual Capital Gain purposes	0	This information is currently not available in ISO 20022. A CR should be submitted to the SEG to include this information at the Trade Details level.		Information will be located in the counterparty Settlement Party 4 //Identification NameAndAddress/Name
Distributor of funds or institutional investor (BIC).	Ο	Distributor of funds or institutional investor (BIC). Use of Other parties party INVE for both. Should an additional code or change of definition be required to cater for Funds distribution more specifically, this will be taken into account later. If a BIC does not exist then a bilateral code will be used. The idea is to permit for intermediaries to comply with recommendation of EFAMA's "fund processing standardization group". Note Other Parties are not supported in the sese.028 a CR should be submitted to the ECB.	Ν	As Other Parties are supported in the sese.023 but not in the sese.028. Information will be located in the counterparty Settlement Party 4 //Identification NameAndAddress/Name.

Business elements	M/O	Additional Information	Supported by T2S	Short-Term workaround
2 levels , distributor of a fund of a fund same thing so transparent from that perspective		2 levels , funds of funds. Use of Other Parties party INVE for both. The delivering party will instruct either level 1 or 2 so no need to have the Investor code to be repetitive.	N	As Other Parties are supported in the sese.023 but not in the sese.028. Information will be located in the counterparty Settlement Party 4 //dentification NameAndAddress/Name

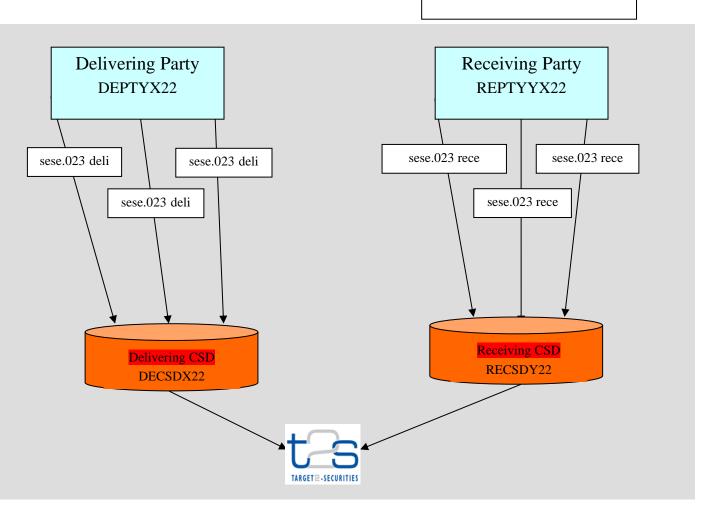
VIII. Market Practice:

A. Communication flow covered by MP.

The below drawing describes the flow (in grey) covered by the practice.

Delivering party DEPTYX22 informs his CSD of a (full or partial) transfer of position to another CSD

Receiving party REPTYX22 has sign a contract with RECSDY22 and will transfer all or part of its holdings to him.



B. General market practice recommendations.

1. Unmatched

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Unmatched Portfolio Transfer instructions: in T2S the Settlement Instructions which include Portfolio Transfer's information will be subject to matching.

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- In case the settlement instruction of the Receiving party will not match the instruction (allegement) input by the Delivering party, the unmatched instructions will follow T2S life cycle meaning that it will be cancelled as per standard T2S rules (20 days).
- It is reminded that portfolio transfer instructions as any other settlement instructions will be subject to settlement discipline regime.

2. Reversal

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Reversal of portfolio transfer instructions already settled: as already occurs, in case of mismatching or errors a reversal request (bilateral agreement to settle a reverse transaction) will be initiated and sent by the Receiving party to the Delivering party.

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When parties agree on the reversal, then a common reference ID need to be used according to the following rule: REV + common reference of the original settled instruction (max 16 characters)

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In case of mismatching or errors, a reversal request can be initiated and sent by the receiving party to the delivering party no later than 20 working days after the effective settlement date;

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In case a transaction with Security Transaction type=PORT contains one or more fields filled-in with the character "0" ("0" shall be understood as a zero), it is understood that the meaning of this format could be:

• the value foreseen for the field is equal to zero,

Completeness and quality check

• the value foreseen is not present in the message.

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In a chain of delivering and receiving party when an intermediary receives an information, it is recommended that this intermediary pass through this information to other intermediary in the chain of the workflow following the present Market Practice unless banking secrecy rules prevent him from doing so.

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It is understood that liability is applicable and limited to the transaction properly instructed where all data element requirement are duly filled in a proper format and transmitted to T2S platform (MX sese.023).

All transaction type PORT not following the requirement listed in this document, although matched in T2S by the Receiving party, may prevent the proper processing by the Receiving party (or its Custodian). Accordingly, the Receiving Party is not deemed to be accountable/responsible of possible (as long as reasonable) delays caused by an allegement not compliant with the requirements listed in the present document.

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4. Missing information not needed for mandatory matching purposes

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If missing information relate to dates of purchase, the date of the portfolio transfer will be considered as the new date of purchase provided any information given by the client to the receiving party. It is up to the receiving party to manage this kind of the information collection in the scope of its relationship with his client.

5. <u>Message format</u>

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Note that this market practice serves as a recommendation not only for ISO messages (ISO 20022 with T2S and ISO 15022 downstream) but also for any other proprietary format. Business processes, flows and data requirements described above should be followed even for proprietary format for domestic markets unless the markets employ other means of information transfer or have different processes in place duly published.

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IX. ISO 20022 Illustrations:

There is no illustration of the status advice sese.024 and the settlement confirmation sese.025 as these follow the standard settlement process.

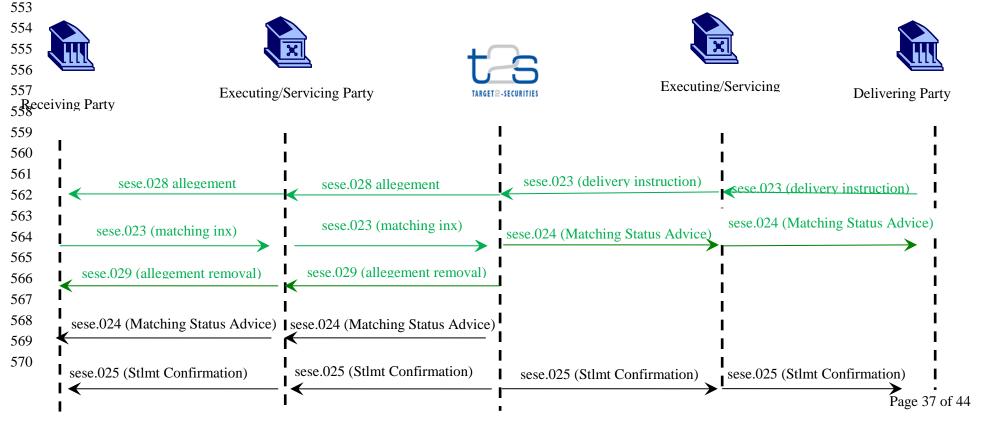
A. Communication Flow:

A communication flow describes the high level communication requirements a business process requires. It shows the typical exchanges of Messages in the context of a transaction.

In green, the main communication requirements for this process.

In black, the surrounding communication requirements.

In dotted line, the optional/potential surrounding communication requirements.



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B. Delivery instruction sese.023

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The below illustration relates to an instruction on a market for which no additional specific elements are needed other than the 10 common elements. If the market requires additional elements, they should be present in the delivery instruction in order for the receiving party to know what the delivering party has instructed.

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Message identification will be included in the Business Application header

sese.023. format	Comments
<txid>123456789</txid>	Comments
<sttlmtpandaddtlparams></sttlmtpandaddtlparams>	
<sctiesmvmnttp>DELI<!--<br-->SctiesMvmntTp></sctiesmvmnttp>	
<pmt>FREE</pmt>	
<pre><cmonid>COMIDxxxxxxx x</cmonid></pre>	Included to avoid cross matching
s>	
<traddtls></traddtls>	
<tradid>Max16Text </tradid>	Tax Capacity Indicator Change of Beneficial Ownership Reliability of Delivering Party Indicator Average Value Date Information separator "/"
<sttlmdt>YYYMMDDImDt></sttlmdt>	
<traddt>YYYMMDD</traddt>	
<dealpric></dealpric>	Value is Rate for bonds and Amount for equities
<tp> <yldd>false</yldd></tp>	

<val></val>	
<rate> 2</rate>	
or <amt< td=""><td></td></amt<>	
Ccy="EUR">10	
<fininstrmid></fininstrmid>	
<isin> XX1234567890</isin>	
<qtyandacctdtls></qtyandacctdtls>	
<sttlmqty></sttlmqty>	
<qty></qty>	
<unit>10000000</unit>	
<sfkpacct></sfkpacct>	
< ld>123456	
<sttlmparams></sttlmparams>	
<sctiestxtp></sctiestxtp>	Type of settlement transaction is PORT for Portfolio Tranfer.
<cd>PORT</cd>	
<sttlmtxcond></sttlmtxcond>	No market claim indicator
<cd>NOMC</cd>	
SttlmTxCond	
<bnfclownrsh></bnfclownrsh>	Specifies whether there is change of beneficial ownership.
<ind>NO</ind>	Please be reminded that this field is not present in

	allegement message (sese.028)
<prtisttlmind></prtisttlmind>	No partial settlement is allowed to avoid automatic partial
<cd>NPAR</cd>	settlement in T2S
<rcvgsttimpties></rcvgsttimpties>	
<dpstry></dpstry>	BIC of the counterparty's Receiving Depository, the place
<ld></ld>	where the counterparty will deliver the securities or where
<anybic> NCSDX122</anybic>	he intends to deliver them.
<pty1></pty1>	BIC or local code of the counterparty receiving agent.
<ld></ld>	
<anybic> CPTYAGEN </anybic>	
<pre><pre>cold> CPTYREF</pre></pre>	Reference of the counterparty when available.
<pty2> <id> <anybic>CPTYCLIE </anybic> </id> </pty2>	BIC of the direct client of the cpty receiving. It is the direct client of the receiving (
<pty3> <id> <anybic>BENEOWN</anybic> </id></pty3>	Bic or local code of the beneficial owner when not party 2. Extra information can be included on NameAnd Address message element
<nmandadr>Max140Txt<td></td></nmandadr>	

mAndAdr>	
<pty4></pty4>	Price for Capital Gain Purposes
<ld> <nmandadr></nmandadr></ld>	Interest Rate
<name>Max140Txt</name>	Average Price
	NAV
	Date of Purchase
	Date of Registration
	Average Value Date
	Fiscal attributes
	UCITS quantity and residual capital gain
	Accrued Interest Amount
	Investor (level 1 or 2) BIC or Local code if BIC is not available
	Information Separator "/"
<rcvgsttimpties></rcvgsttimpties>	
<othramts></othramts>	
<acrdintrstamt></acrdintrstamt>	Accrued Interest Amount
<amt< td=""><td></td></amt<>	
Ccy=CCY>1000	
<cdtdbtind>CRDT<td></td></cdtdbtind>	
btInd>	
AcrdIntrstAmt	
OthrAmts	

C. Allegement

582583584

585 586 The below illustration relates to an instruction on a market for which no additional specific elements are needed other than the 10 common elements. If the market requires additional elements, they should be present in the allegement in order for the alleged party (in this case the receiving party) to know what the alleging party (the delivering party) has instructed.

Scenario sese.028:

587588

Message identification will be included in the Business Application header

Sese.028. format	Comments
<txld>123456789</txld>	
<sttlmtpandaddtlparams></sttlmtpandaddtlparams>	
<sctiesmvmnttp>DELI<!--<br-->SctiesMvmntTp></sctiesmvmnttp>	The <u>counterparty's instruction (delivering party)</u> is a delivery (DELI).
<pmt>FREE</pmt>	The <u>counterparty's instruction (delivering party)</u> is free of payment (FREE).
<pre><cmonid>COMIDxxxxxxx x</cmonid></pre>	Included to avoid cross matching
s>	
<traddtls></traddtls>	
<acctownrtxid>ACOWR EF</acctownrtxid>	A sese.028 could relate to the instruction of the account owner that could be a potential match. This is optional and would not be sent by T2S but by an Executing/Servicing party
For the rest same as the instruction.	

591 X. Appendix:

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A. Matching fields in T2S

	g fields in T2S messages s Settlement Transaction Alleger	ment Notification - sese 028 (I)
Matching field	Message field sese.023	Message field sese.028
Payment type	(SctiesSttlmTxInstr\SttlmTpAndAddtlParams\Pmt)	(SctiesSttlmTxAllgmtNtfctn\SttlmTpAndAddtlParams\Pmt)
Securities movement type	(SctiesSttlmTxInstr\SttlmTpAndAddtlParams\SctiesMvmntTP)	(SctiesSttlmTxAllgmtNtfctn\SttlmTpAndAddtlParams\SctiesMvmntTP)
Common trade reference	(SctiesSttlmTxInstr\SttlmTpAndAddtlParams\CmonId)	(SctiesSttlmTxAllgmtNtfctn\SttlmTpAndAddtlParams\CmonId)
Trade date	(SctiesSttlmTxInstr\TradDtls\TradDt\)	(SctiesSttlmTxAllgmtNtfctn\TradDtls\TradDt\)
ISD	(SctiesSttlmTxInstr\TradDtls\SttlmDt\Dt)	(SctiesSttImTxAllgmtNtfctn\TradDtls\SttImDt\Dt)
CUM/Ex indicator	(PaymeSctiesSttlmTxInstr\TradDtts\TradTxCond\Cd)	(SctiesSttlmTxAllgmtNtfctnr\TradDtls\TradTxCond\Cd)
ISIN	(SctiesSttlmTxInstr\FinInstrmId\ISIN)	(SctiesSttlmTxAllgmtNtfctn\FinInstrmId\ISIN)
Settlement quantity	(SctiesSttlmTxInstr\QtyAndAcctDtls\SttlmQty\Qty)	(SctiesSttlmTxAllgmtNtfctn\QtyAndAcctDtls\SttlmQty\Qty)
Opt-out ISO indicator	(SctiesSttlmTxInstr\SttlmParams\SttlmTxCond\Cd)	(SctiesSttImTxAllgmtNtfctn\SttImParams\SttImTxCond\Cd)
CSD of delivering party	(SctiesSttImTxInstr\DivrgSttImPties\Dpstry\Id\AnyBIC)	(SctiesSttlmTxAllgmtNtfctn\DivrgSttlmPties\Dpstry\Id\AnyBIC)
Delivering party BIC	(SctiesSttlmTxInstr\DlvrgSttlmPties\Pty1\ld\AnyBIC)	(SctiesSttImTxAllgmtNtfctn\DlvrgSttImPties\Pty1\Id\AnyBIC)
Client of the delivering CSD Part.	(SctiesSttlmTxInstr\DlvrgSttlmPties\Pty2\)	(SctiesSttlmTxAllgmtNtfctn\DlvrgSttlmPties\Pty2\)
Sec. account of deliver, party	(SctiesSttlmTxInstr\DivrgSttlmPties\Pty1\SfkpgAcct\ld)	(SctiesSttlmTxAllgmtNtfctn\DlvrgSttlmPties\Pty1\SfkpgAcct\ld) or (SctiesSttlmTxAllgmtNtfctn\QtyAndAcctDtis\SfkpgAcct)
CSD of receiving party	(SctiesSttImTxInstr\RcvgSttImPties\Dpstry\Id\AnyBIC)	(SctiesSttlmTxAllgmtNtfctn\RcvgSttlmPties\Dpstry\ld\AnyBIC)
Receiving party BIC	(SctiesSttlmTxInstr\RcvgSttlmPties\Pty1\Id\AnyBIC)	(SctiesSttlmTxAllgmtNtfctn\RcvgSttlmPties\Pty1\ld\AnyBIC)
Client of the receiving CSD Part.	(SctiesSttlmTxInstr\DlvrgSttlmPties\Pty2\)	(SctiesSttImTxAllgmtNtfctn\DivrgSttImPties\Pty2\)
Sec account of receiv. party	(SctiesSttlmTxInstr\RcvgSttlmPties\Pty1\SfkpgAcct\ld)	(SctiesSttlmTxAllgmtNtfctn\RcvgSttlmPties\Pty1\SfkpgAcct\Id) or (SctiesSttlmTxAllgmtNtfctn\QtyAndAcctDtls\SfkpgAcct)
Currency	(SctiesSttlmTxInstr\SttlmAmt\Amt\Ccy)	(SctiesSttlmTxAllgmtNtfctn\SttlmAmt\Amt\Ccy)
Settlement amount	(SctiesSttlmTxInstr\SttlmAm\Amt)	(SctiesSttlmTxAllgmtNtfctn\SttlmAm\Amt)
Credit/Debit	(SctiesSttlmTxInstr\SttlmAm\CdtDbtInd)	(SctiesSttImTxAligmtNtfctn\SttImAm\CdtDbtInd)

595	B. Members of the EWGPT:			
596				
597	Chairperson:			
598	P. COLLADON	SOCIETE GENERALE		(France)
599				
600	Representatives and alterna	ates:		
601	M. KOHLHASE	BUNDESVERBAND DEUTSCHER BANKE	N (main)	(*) (Germany)
602	F. HEIDKAMP	COMMERZBANK	(alternate) (*)	(Germany)
603	M. NIEDERHEIDE	DEUTSCHE BANK	(alternate) (*)	(Germany)
604	J. PALVALIN	NORDEA		(Finland)
605	P. DEANTONI	SGSS SPA		(Italy)
606	S. BURTON	AFME		
607	E. DEPAUW	EUROCLEAR	(main)	(ECSDA)
608	J.L.FRIPIAT	EUROCLEAR	(alternate)	
609	K. TAQUET	SWIFT		
610	D. DEGENNARO	EBF		
611	М. ТОРА	CITIBANK	(Chairman of	EBF Post Trade Working Group)
612				
613	(*) W. BLASCHKE COMM	ERZBANK was the initial main German represent	ative from the	beginning of the Group to June 2015 draft
614	publication			
615				