

# SCoREBOARD

## Billing Processes – H2 2024

Cypriot NSG

### Background

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

### What is SCoRE?

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

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

The Single Collateral Management Rulebook for Europe contains 4 Standards related to billing processes (published as the [SCoRE Standards for Billing Processes](#)). Implementation progress is monitored twice per year.

### Introduction

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

- 1 CSD – Cyprus Stock Exchange
- 7 Custodians (of which 5 participated)

In this monitoring exercise, participants were expected to have achieved all the milestones up to Milestone 11 inclusive “Final external communication on SCoRE”

8 entities are monitored in the Cypriot market, only 6 entities participated in H2 2024 monitoring exercise

(with a deadline of 22 May 2023) as described in section 3 below. The findings of the monitoring exercise reflect the Milestones roadmap in place by the time the survey closed (i.e., 13 September 2024) and do not yet consider the AMI-SeCo reflections on the rescheduling of the existing SCoRE Standards implementation deadline from 18 November 2024 to 16 June 2025.

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

## 1 Key takeaways

Implementation of the Billing Processes Standards in the Cypriot market is behind schedule

6 stakeholders out of 8 participated in the H2 2024 monitoring exercise. Implementation of the Billing Processes Standards in the Cypriot market is behind schedule. This section presents the key findings of the survey for each entity type. It is worth noting that despite the fact that 6 stakeholders submitted their responses, there is one additional custodian that did not respond directly to the survey for the Cypriot market, but nevertheless confirmed the absence of any progress as regards its harmonisation work since the previous update report.

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

	 Response Rate	 Implementation Status	Are all milestones 1 to 11 inclusive achieved?	Will the last milestone 13 be implemented on time (i.e. by 18 November 2024) ?
Custodians	71%	Implemented 18.75% Implementation started 25% Analysis started 0% Analysis not started 18.75% Replies not submitted 37.5% ----- Non applicable standards 23.81%	Average % of milestones achieved 31%	% of custodians on time 29%
CSD - CYPRUS STOCK EXCHANGE	Survey submitted	Implemented 0% Implementation started 40% Analysis started 60% Analysis not started 0% ----- Non applicable standards 0%	No	06/26

CSE implementation is behind schedule

## CSD – Cyprus Stock Exchange (CSE)

The CSE is currently behind schedule for the implementation of SCoRE Billing Processes Standards (based on the agreed milestones), as the CSE has indicated that the analysis and the adaptation of the applicable SCoRE Standards has not yet been completed. The CSE expects to gradually implement the standards by November 2025.

The CSE's compliance with interim milestones depends, to a great extent, on the corresponding harmonisation work of ATHEXCSD (i.e. for Billing Processes Standards 1, 2, 3 and 4). This is because ATHEXCSD is a critical service provider to the CSE as: (i) it provides, hosts and maintains the servers of the Central Depository Central Registry (i.e. 'CDCR', which is a department of the CSE) at the primary site, and (ii) it hosts and maintains the dematerialised securities system of CDCR at a second processing site in Greece.

The CSE assesses that, in collaboration with the ATHEXCSD it will implement all the relevant standards by November 2025. Currently, all 4 standards require harmonisation. Except for Milestones 1 and 2 that were implemented in H2 2021, the rest still fall behind schedule (please refer to Table 3 'Expectation of achieving the milestones at the set dates').

## Custodians

Custodians are currently behind schedule

H2 2024 monitoring exercise covers around 90% of custodians which are active in the Cypriot market, the implementation status of who participated is distributed as follows:

- 13% of standards (at granular subpoint level) are reported as already implemented;
- 17% of standards are reported under ongoing development and implementation;
- For 13% of the standards analysis has not started yet;
- 22% of standards are reported as not applicable to the individual custodians' operations.
- 35% of standards' responses relate to the custodians that did not respond to the survey.

Custodians have indicated 31% compliance with the current milestones for the implementation of SCoRE Corporate Action Standards, compared to 43% compliance in H1 2024. This is attributed to the non-response of a single custodian who has nevertheless implemented all milestones. Custodians expect to implement the standards by November 2027.

Standards 3 and 4 do not apply to custodians.

## NCB

Central Bank of Cyprus will implement the SCoRE Standards by 16 June 2025

In the context of the ECMS project, the Central Bank of Cyprus is on track for implementing the SCoRE Billing Processes for its collateral management activities by 16 June 2025.

## 2 Compliance with the standards

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

**Figure 2**  
Standards implementation status as defined in the AMI-SeCo framework document



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

**Table 1**  
Compliance level with the standards by each entity type

STANDARD	Custodians	CSD - CYPRUS STOCK EXCHANGE
1: ISO 20022 messaging	30%	Y
2: Billing cycles	67%	G
3: Cut-off date		G
4: Dates for payments fees		Y

- Notes:
- Standards 3 and 4 are irrelevant for custodians
  - For CSDs and TPAs the colour-code reflects the current implementation status of each Standard in accordance with the methodology outlined in Box 1 above.
  - For custodians the % indicates the percentage of custodians which have implemented the standard or have the standard under development and implementation.
  - Percentages are calculated on the basis of expected respondents, i.e. number of entities monitored in the market.

### 3 Progress towards the milestones

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

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

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

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

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

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

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

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

**Table 3**  
Expectation of achieving the milestones at the set dates

	Custodians	CSD - CYPRUS STOCK EXCHANGE
Milestone 1 June 2020	43%	Yes
Milestone 2 March 2021	43%	Yes
Milestone 3 July 2021	29%	11/24
Milestone 4 December 2021	29%	01/25
Milestone 5 December 2021	29%	01/25
Milestone 6 January 2022	29%	02/25
Milestone 7 June 2022	29%	12/25
Milestone 8 July 2022	29%	01/26
Milestone 9 March 2023	29%	03/26
Milestone 10 May 2023	29%	04/26
Milestone 11 May 2023	29%	06/26
Milestone 12 September 2024	29%	05/26
Milestone 13 November 2024	29%	06/26

## 4 Concluding remarks

The CSE is currently behind schedule for the implementation of SCoRE Billing Processes Standards (based on the milestones provided by the AMI-SeCo).

The CSE's compliance with the set milestones depends, to a great extent, on the corresponding harmonisation work of ATHEXCSD, which is a critical service provider to the CSE for providing, hosting and maintaining the servers of the Depository in Greece.

The CSE in collaboration with the ATHEXCSD assesses that they will implement all the (relevant to the CSE) standards by November 2025. Currently, all 4 standards require harmonisation. The CSE has indicated that full implementation of the standards will be effected behind schedule. Except for Milestones 1 and 2 that were implemented in H2 2021, the rest still fall behind schedule (please refer to Table 3 'Expectation of achieving the milestones at the set dates').

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