

The Association of Global Custodians - Questionnaire 2020 - 2021

Entity Name	Transnational Euroclear Bank S.A. / N.V.		
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Welcome to the Depository-Information Gathering Project.

Before beginning, we suggest that you print the entire document for review on paper and review the Glossary of Terms. Each will assist you with answering the questions. For help, contact: Robin D. Truesdale, Baker & McKenzie LLP (202) 835-1664   ; e-mail:

Robin.Truesdale@bakermckenzie.com.

Note

- * When reviewing/updating your prior year's responses in the questionnaire, please ensure that the sub-questions are reviewed/updated as well.
- * Please deselect/uncheck any responses in the sub-questions where those responses are no longer applicable.
- * Please note: Any text in the "other" and/or "please explain/describe" questions should be deleted before deselecting the response. In this regard, note that deselecting a response with written text does not delete the information, it only hides the information from view.
- * Any responses that appear in open text boxes should be deleted if the information is no longer applicable.

SCOPE, STRUCTURE, OWNERSHIP, CAPITAL, REGULATION AND AUDIT

The purpose of this section is to understand the ownership structure and financial strength of your institution, as well as the level of regulatory and operational supervision to which it is subject.

Response Necessary/Eligibility Question

1. Rule 17f-7, by reference to Rule 17f-4, requires that, for a depository to be eligible to hold securities of U.S. registered investment companies (such depositories hereinafter referred to as "Eligible Securities Depositories"), the depository must be a "system for the central handling of securities where all securities of any particular class or series of any issuer deposited within the system are treated as fungible and may be transferred or pledged by bookkeeping entry without physical delivery of the securities."

Are all securities of a particular class or series of any issuer that are deposited in your institution treated as fungible, and can they be transferred or pledged by bookkeeping entry without physical delivery of the securities?

- Yes
- No (please answer 1a)
- Other (please answer 1a)

1a. Please explain:

All securities of a particular class or series of any issuer that are deposited in Euroclear Bank are held on a fungible basis. With the exception of physical securities, they cannot be transferred or pledged by bookkeeping entry without physical delivery of the securities.

Response Necessary/Eligibility Question

2. Rule 17f-7 also requires that an Eligible Securities Depository "acts as or operates a system for the central handling of securities or equivalent book-entries in the country where it is incorporated," or "acts as or operates a transnational system for the central

handling of securities or equivalent book-entries." Does your institution: (Choose all that apply.)

- Act as or operate a system for the central handling of securities or equivalent book-entries in the country where it is incorporated? (please answer 2b)
- Act as or operate a transnational system for the central handling of securities or equivalent book-entries? (please answer 2b)
- Act in another capacity with respect to the handling of securities or equivalent book-entries? (please answer 2a)
- Not applicable (please answer 2a)
- Other (please answer 2a)

2b. Please specify the types of securities for which you act as or operate a system for the central handling of securities or equivalent book-entries:

Securities accepted in Euroclear Bank include international bonds i.e. Eurobonds, foreign bonds and global bonds, domestic debt, convertibles, warrants, equities, depository receipts, investment funds, ETFs.

3. What type of legal entity is the institution? (Choose all that apply.)

- Public Company
- Private Company
- Central Bank (or part thereof)
- Stock Exchange (or part thereof)
- Other (please answer 3a)

4. Is the institution operated as a "for profit" or a "not for profit" organization?

- For profit
- Not for profit
- Other (please answer 4a)

4a. If other, please explain:

We work every day to support stability in our existing markets and further developing local and global markets. We achieve this through long-term partnerships with our clients and through partnerships and collaboration with key market entities.

We are proud of our client-centric approach and remain driven by client needs rather than pure profit generation.

5. Please provide the names of the owners and their ownership interest percentages.

Euroclear Bank is a wholly owned subsidiary of Euroclear SA/NV. Euroclear SA/NV is the parent company of the international and national central securities depositories ((I)CSDs) of the group. It owns the group's shared securities processing platforms and delivers a range of services to the group's depositories. Euroclear Holding is the top holding company of the Euroclear Group which owns, directly or indirectly, the entire issued ordinary share capital of the group companies.

6. Please answer the following:

6a. What is the date of establishment of the depository? 01/12/1968

6b. What is the date that the depository's operations began? 01/12/1968

7. Under what regulation or statute is the depository established and governed?

Belgian Royal Decree No. 62 dated November 10, 1967 Facilitating the Circulation of Securities, as amended from time to time. In addition, the Belgian banking law of 25 April 2014 - entry into force on 07 May 2014 - on the legal status and supervision of credit institutions. We are recognised as a 'central securities depository for financial instruments' by Royal Decree of 22 August 2002. In this capacity, we operate a Securities Settlement System (The Euroclear System) pursuant to the Belgian Settlement Finality Act which implements the EU Directive 98/26/EC. Euroclear Bank has received a license as 'CSD with banking licence' under the EU CSD Regulation.

7a. Is the regulation or statute electronically available?

- Yes (please answer 7b)
- No

7b. If regulation or statute is electronically available, please supply web address(es) here or upload document(s) in question 7c.

The laws and regulations that are applicable to the Euroclear System and which form its legal basis are published in the Official Gazette of the Kingdom of Belgium (accessible to the public at <http://www.ejustice.just.fgov.be/cgi/welcome.pl>). In addition, legislation related to the financial sector can be consulted on the website of the Belgian Financial Services and Markets Authority (<http://www.fsma.be>) or on the website of the National Bank of Belgium (<http://www.nbb.be>).

7c. Please supply document(s) here:

7d. Please provide details of the structure and composition of your Board together with their industry experience and responsibilities in governing the depository.

What are the qualifications to become a board member?

The Board shall be composed of suitable members of sufficiently good repute with an appropriate mix of skills, experience and knowledge of the Company and of the market. The majority of the members of the Board are non-executive members. The Board shall comprise at least one third, but no less than two, independent members. Independence is defined in accordance with the applicable legal and regulatory requirements. Appointments of individual Board members are subject to a prior assessment of his or her expertise and professional integrity (referred to as 'fit and proper', in accordance with local regulatory guidance), and to prior regulatory approval by the supervisory authority. Board members must permanently comply with the 'fit and proper' requirements during their term of office. The Board must collectively have the appropriate balance of skills, experience, independence, knowledge, and diversity to fulfil its duties. As part of the Company's diversity policy, the Board composition must take account of the target and the time frame regarding the representation of the underrepresented gender, as decided by the non-executive members of the Board. You can read more via the following link:

<https://www.euroclear.com/dam/Brochures/About/Boards%20and%20Committees/EB/Terms-of-Reference-EB-Board.pdf>.

7e. What are the election procedures?

In accordance with Belgian law, Board members are appointed by the shareholders. The Board submits to the shareholders its proposals regarding appointment and renewal/non-renewal of Board members, supported by a recommendation of the Nominations and Governance Committee.

When a Board member leaves the Board before the end of her/his term, the Board can appoint a new Board member to fill the vacancy with such appointment being confirmed by the shareholders at their next General Meeting.

Appointments of individual Board members are subject to a prior assessment of his or her expertise and professional integrity (referred to as 'fit and proper', in accordance with local regulatory guidance), and to prior regulatory approval by the supervisory authority.

The Company will also inform the supervisory authority of any proposed renewal of appointment, as well as of non-renewal and removal. Board members must permanently comply with the 'fit and proper' requirements during their term of office.

7f. What is the maximum length of time a board member can serve?

Board members are appointed by the general meeting of shareholders for a term of up to three years (with possibility of renewal), in accordance with the Articles of Association and the Company's Board and Board Committee Composition Policy.

The term of office of a Board member who is not re-appointed expires immediately after the relevant general meeting of shareholders.

7g. How are the voting powers distributed amongst the board members (i.e. does each board member have one vote or do certain members have additional voting power)?

Each board member has one vote, and the Chair has the casting vote in case of equality of votes.

7h. Who is responsible for regulating the board members?

The prudential supervision of Euroclear Bank, and therefore the Board members of Euroclear Bank, falls under the responsibility of the National Bank of Belgium.

We are also subject to the supervision of the Belgian Financial Services and Markets Authority (FSMA) for the matters that fall within its competencies (such as conduct of business rules deriving from the Markets in Financial Instruments Directive (MiFID), protection of client's assets, market abuse and conflicts of interests).

Response Necessary/Eligibility Question

8. Rule 17f-7 requires that an Eligible Securities Depository "is regulated by a foreign financial regulatory authority as defined under section 2(a)(50) of the Act", with section 2(a)(50) establishing that "'foreign financial regulatory authority' means any (A) foreign securities authority, (B) other governmental body or foreign equivalent of a self-regulatory organization empowered by a foreign government to administer or enforce its laws relating to the regulation of fiduciaries, trusts, commercial lending, insurance, trading in contracts of sale of a commodity for future delivery, or other instruments traded on or subject to the rules of a contract market, board of trade or foreign equivalent, or other financial activities, or (C) membership organization a function of which is to regulate the participation of its members in activities listed above."

Who regulates the activities of the depository? (Choose all that apply.)

- A governmental body or regulatory organization empowered to administer or enforce laws related to securities matters.
- A governmental body or self-regulatory organization empowered to administer or enforce laws related to other financial activities.
- A membership organization which regulates the participation of its members in securities matters or other financial activities.
- Other (please answer 8a)

9. Please provide the name of regulatory authority(ies) identified in question 8:

1. National Bank of Belgium (www.nbb.be)
2. Belgian Financial Services and Markets Authority (www.fsma.be)

Response Necessary/Eligibility Question

10. Rule 17f-7 requires that an Eligible Securities Depository “is subject to periodic examination by regulatory authorities or independent accountants.”

Is the depository subject to periodic examination by: (Choose all that apply.)

- Regulatory authorities?
- Independent accountants?
- Other (please answer 10a)

11. What enforcement actions are available to the regulatory authority(ies) for breach of applicable statute or regulatory requirements? (Choose all that apply.)

Name of Authority #1 (please answer 11a):

Financial Services and Market Authority

11a.

- Fines
- Restrictions on depository activities.
- Suspension of depository activities.
- Termination of depository activities.
- Other (please answer 11b)

Name of Authority #2 (please answer 11c):

National Bank of Belgium.

11c.

- Fines
- Restrictions on depository activities.
- Suspension of depository activities.
- Termination of depository activities.
- Other (please answer 11d)

12. Has there been any use of such enforcement actions in the last three years?

- Yes (please answer 12a)
- No
- Other (please answer 12a)

Capital

13. Are annual financial statements publicly disclosed?

- Yes (please answer 13a)

- No (please answer 13e)
- Other (please answer 13h)

13a. If yes, the AGC requests a copy of the institution's annual report. Is the annual report available electronically?

- Yes (please answer 13b)
- No (if no, please send a copy of the annual report to the Washington office of Baker & McKenzie, 815 Connecticut Ave., NW, Washington, DC 20006, Attn: Robin Truesdale)

13b. If yes, please upload the document(s) here or insert web link(s) in question 13d:

[Euroclear Annual review 2019.pdf](#)

13c. If more than one document for 13b, please upload the additional document here:

[Euroclear Bank Financial Statements 2019.pdf](#)

13d. Please insert web link(s) for 13b here:

<https://www.euroclear.com/investorrelations/en/annual-reports.html>

Internal Audit

14. Is an internal audit undertaken in your depository?

- Yes (please answer 14a)
- No (please proceed to 15)

14a. If yes, what areas does the audit cover (financials, operations, etc.) and which department in your depository handles it?

Internal Audit has set up a comprehensive audit universe, including all processes and services carried out by the group and all locations, whether directly or outsourced. Audits are issued on a continuous basis. The Internal Audit Charter stipulates that the Head of Audit should report to a level within the organisation that allows Internal Audit to fulfil its responsibilities, with proper independence in determining the audit universe, audit plan and scope of internal audit reviews, performing work and communicating results.

The internal audit plan covers the full audit universe and is presented quarterly for approval by the Management Committee and the Audit Committee of Euroclear Bank. Therefore, financial and operational audit is conducted. Custody operations are audited at least every two years.

14b. Please list the date of your last internal audit:

Please list the period that the audit covered:

to

14c. How frequently does the internal audit occur? (Choose one.)

- Two or more times a year (please answer 14e)
- Annually (please answer 14e)
- Less than annually (please answer 14d)

14e. Are the results of the internal audit publicly available?

- Yes
- No

14f. Please select the statement that most accurately characterizes the results of the last internal audit: (Choose one.)

- No material exceptions found.
- Minor exceptions found. (please answer 14g)
- Material exceptions found. (please answer 14g)

15. Is a financial audit performed by an Audit Firm, Regulatory Authority, or other external party?

Yes (please answer 15a)

No (please proceed to 16)

15a. If yes, please state the name(s) of the entity(ies) who perform the financial audit.

Deloitte

15b. Please list the date of your last financial audit performed by an Audit Firm, Regulatory Authority, or other external party:

30/12/2019

15c. Please list the period that the audit covered:

31/12/2018 to 30/12/2019

15d. How frequently does the financial audit occur? (Choose one.)

Two or more times a year (please answer 15f)

Annually (please answer 15f)

Less than annually (please answer 15e)

15f. Are the results of the financial audit publicly available?

Yes

No

15g. Please select the statement that most accurately characterizes the results of the last financial audit: (Choose one.)

No material exceptions found.

Minor exceptions found. (please answer 15h)

Material exceptions found. (please answer 15h)

16. Is an operational audit performed by an Audit Firm, Regulatory Authority, or other external party?

Yes (please answer 16a)

No (please proceed to 17)

16a. If yes, please state the name(s) of the entity(ies) who perform the operational audit.

Deloitte has been appointed to produce a yearly ISAE 3402 report type II (review of the adequacy and effectiveness of the controls in place). The ISAE 3402 report is made available to clients on our website www.euroclear.com.

The National Bank of Belgium (NBB) is the regulator of the Euroclear Group and undertakes regular on-site inspections on site. NBB reports are not made public.

16b. Please list the date of your last operational audit performed by an Audit Firm, Regulatory Authority, or other external party:

30/12/2019

16c. Please list the period that the audit covered:

31/12/2018 to 30/12/2019

16d. How frequently does the operational audit occur? (Choose one.)

Two or more times a year (please answer 16f)

Annually (please answer 16f)

Less than annually (please answer 16e)

16f. Are the results of the operational audit publicly available?

Yes

No

16g. Please select the statement that most accurately characterizes the results of the last operational audit: (Choose one.)

- No material exceptions found.
- Minor exceptions found. (please answer 16h)
- Material exceptions found. (please answer 16h)

16h. If minor or material exceptions were found, what actions were taken? Please describe:

PARTICIPANTS AND PARTICIPATION

The purpose of this section is to understand issues relating to participation in the depository, including eligibility requirements, conditions of participation, and supervision of participants.

17. What types of entities are eligible to become participants and how many of each type are there currently? (Choose all that apply.)

- Banks (please answer 17a)
- Brokers (please answer 17e)
- Individuals (please answer 17i)
- Foreign Institutions (please answer 17m)
- Other entities (please answer 17q)
- Not applicable

17a. How many Bank participants are there currently? (then please answer 17b)

Euroclear Bank has around 1,500 Participants. We do not publish a breakdown of our client base.

17b. Please select the features included in the eligibility requirements for Banks. (Choose all that apply.)

- Financial Thresholds (please answer 17c)
- Regulatory Oversight (please answer 17c)
- Market Experience (please answer 17c)
- Other (please answer 17d)

17c. Where can a description of the specific eligibility requirements for Bank participants be found?

You can find this in section 2.1 'Requirements to become a Participant' of the 'Operating Procedures of the Euroclear System', attached and available via the Due Diligence Pack on my.euroclear.com

17d. Please explain:

As set forth in section 2.1.2 (e) of the Operating Procedures, Participants must comply with the below criteria on an ongoing basis in order to participate in the Euroclear System:

- adequate financial resources - You demonstrate adequate financial resources to run your business on a going concern basis and meet your obligations towards us, the Euroclear System and its Participants. This includes:
 - your current resources and your ability to maintain adequate financial resources on an ongoing basis, having regard to your activities and the environment in which you operate
 - you provide your annual reports for the two preceding years, and those of your direct and ultimate parent companies and you provide these statements on an annual basis as long as you remain a Participant
- operational and technological capacity - You have adequate operational and technological capacity to ensure business continuity and avoid material adverse impact on the integrity of the Euroclear System. This includes:
 - you have adequate human resources, facilities and infrastructure to use the Euroclear System effectively
 - you can comply with the security requirements necessary for the safety of the Euroclear System
 - you can install, operate and maintain the necessary communication platforms with the Euroclear System
 - you have adequate back-up facilities and contingency plans for maintaining operational capabilities in contingency situations

- legal capacity - You demonstrate your legal capacity and ability to accept and comply with the rules of the Euroclear System. This includes:

- you are duly incorporated in your country of permanent establishment (articles of association, by-laws, extract of your national legal entities registry)
- you are duly licensed and supervised to carry out your business

- internal control and risk management - You have an appropriate internal control and risk management framework in place that is such as to preserve the integrity and reputation of the Euroclear System. This includes:

- your internal control and risk management framework is commensurate with your risk profile, capital strength and business strategy
- you have no business practices or any other factor that would adversely reflect on your internal controls and risk management
- your business activities do not generate unacceptable risks for the Euroclear System or for us

- ethical standards - You have implemented ethical standards that are such as to protect the integrity and reputation of the Euroclear System. This includes:

- if you are subject to anti-money laundering and terrorism financing regulations, your ability to demonstrate an adequate anti-money laundering program which includes a procedural framework, Know Your Customer (KYC) measures, beneficial owners and Politically Exposed Persons (PEPs) identification and monitoring of client activities
- your adherence to high standards for fighting fraud, bribery, market abuse and conflicts of interest
- your management's reputation is adequate

The above requirements are the basic requirements for all Participants.

Clients are considered 'Standard Participants' if they:

- are licensed as a credit institution or investment firm, whether or not in the EU
- are a public authority or a publicly guaranteed undertaking
- fall under the supervision of a competent authority in the meaning of the EBA (1093/2010), EIOPA (1094/2010), ESMA (1095/2010) or EMIR (648/2012) regulations.

There are additional eligibility requirements for clients who are:

- Specific Regulated Participants, i.e. are subject to supervision in a jurisdiction outside the EU or are listed on a stock exchange; or
- Specific Participants, i.e. are neither subject to supervision in their jurisdiction nor listed on a stock exchange.

Further information is provided in section 2.1.2 (e) of the Operating Procedures.

17e. How many Broker participants are there currently? (then please answer 17f)

Euroclear Bank has around 1,500 Participants. We do not publish a breakdown of our client base.

17f. Please select the features included in the eligibility requirements for Brokers. (Choose all that apply.)

- Financial Thresholds (please answer 17g)
- Regulatory Oversight (please answer 17g)
- Market Experience (please answer 17g)
- Other (please answer 17h)

17g. Where can a description of the specific eligibility requirements for Broker participants be found?

You can find this in section 2.1 'Requirements to become a Participant' of the 'Operating Procedures of the Euroclear System' attached.

17h. If other, please explain:

As set forth in section 2.1.2 (e) of the Operating Procedures, Participants must comply with the below criteria on an ongoing basis in order to participate in the Euroclear System:

- adequate financial resources - You demonstrate adequate financial resources to run your business on a going concern basis and meet your obligations towards us, the

Euroclear System and its Participants. This includes:

- your current resources and your ability to maintain adequate financial resources on an ongoing basis, having regard to your activities and the environment in which you operate
 - you provide your annual reports for the two preceding years, and those of your direct and ultimate parent companies and you provide these statements on an annual basis as long as you remain a Participant
- operational and technological capacity - You have adequate operational and technological capacity to ensure business continuity and avoid material adverse impact on the integrity of the Euroclear System. This includes:
- you have adequate human resources, facilities and infrastructure to use the Euroclear System effectively
 - you can comply with the security requirements necessary for the safety of the Euroclear System
 - you can install, operate and maintain the necessary communication platforms with the Euroclear System
 - you have adequate back-up facilities and contingency plans for maintaining operational capabilities in contingency situations
- legal capacity - You demonstrate your legal capacity and ability to accept and comply with the rules of the Euroclear System. This includes:
- you are duly incorporated in your country of permanent establishment (articles of association, by-laws, extract of your national legal entities registry)
 - you are duly licensed and supervised to carry out your business
- internal control and risk management - You have an appropriate internal control and risk management framework in place that is such as to preserve the integrity and reputation of the Euroclear System. This includes:
- your internal control and risk management framework is commensurate with your risk profile, capital strength and business strategy
 - you have no business practices or any other factor that would adversely reflect on your internal controls and risk management
 - your business activities do not generate unacceptable risks for the Euroclear System or for us
- ethical standards - You have implemented ethical standards that are such as to protect the integrity and reputation of the Euroclear System. This includes:
- if you are subject to anti-money laundering and terrorism financing regulations, your ability to demonstrate an adequate anti-money laundering program which includes a procedural framework, Know Your Customer (KYC) measures, beneficial owners and Politically Exposed Persons (PEPs) identification and monitoring of client activities
 - your adhesion to high standards for fighting fraud, bribery, market abuse and conflicts of interest
 - your management's reputation is adequate

The above requirements are the basic requirements for all Participants.

Clients are considered 'Standard Participants' if they:

- are licensed as a credit institution or investment firm, whether or not in the EU
- are a public authority or a publicly guaranteed undertaking
- fall under the supervision of a competent authority in the meaning of the EBA (1093/2010), EIOPA (1094/2010), ESMA (1095/2010) or EMIR (648/2012) regulations.

There are additional eligibility requirements for clients who are:

- Specific Regulated Participants, i.e. are subject to supervision in a jurisdiction outside the EU or are listed on a stock exchange; or
- Specific Participants, i.e. are neither subject to supervision in their jurisdiction nor listed on a stock exchange.

Further information is provided in section 2.1.2 (e) of the Operating Procedures.

17l. If other, please explain:

Please refer to question 17h above.

17m. How many Foreign Institution participants are there currently?

Euroclear Bank has around 1,500 Participants. As an International Central Securities Depository (ICSD), we do not distinguish between foreign and domestic clients. We do not publish a breakdown of our client base.

17n. Please select the features included in the eligibility requirements for Foreign Institution participants. (Choose all that apply.)

- Financial Thresholds (please answer 17o)
- Regulatory Oversight (please answer 17o)
- Market Experience (please answer 17o)
- Other (please answer 17p)

17o. Where can a description of the specific eligibility requirements for Foreign Institution participants be found?

You can find this in section 2.1 'Requirements to become a Participant' of the 'Operating Procedures of the Euroclear System' attached.

17p. If other, please explain:

As set forth in section 2.1.2 (e) of the Operating Procedures, Participants must comply with the below criteria on an ongoing basis in order to participate in the Euroclear System:

(a) We will consider you for your admission in the Euroclear System as either

- a Standard Participant
- a Specific Regulated Participant
- a Specific Participant

depending on your regulatory status and/or place of permanent establishment.

This categorisation is by virtue of the Belgian legislation implementing the Settlement Finality Directive. Specific Regulated Participants and Specific Participants must comply with specific additional requirements to mitigate potential additional risks resulting from their participation in the Euroclear System.

You must bring appropriate evidence enabling us to adequately consider and handle your application. All documents related to your application must be in English. We will treat your application promptly, as further detailed in Section 2.1.3.

However, once admitted, all Participants have the same rights and obligations towards Euroclear Bank as operator of the Euroclear System irrespective of their categorisation which is relevant only for the admission process.

(b) You are a Standard Participant if either:

- you are licensed as a credit institution or investment firm, whether or not in the EU
- you are a public authority or a publicly guaranteed undertaking, whether or not in the EU
- you are located in the EU and licensed as a CSD in the meaning of CSDR
- you are located in the EU and licensed as a central counterparty in the meaning of EMIR
- you otherwise fall under the supervision of a competent authority in the meaning of the EBA Regulation, the EIOPA Regulation, the ESMA Regulation or EMIR.

(c) You are a Specific Regulated Participant if either:

- you are subject to supervision in a jurisdiction outside the EU (other than as a credit institution or investment firm), or
- you are listed on a stock exchange.

(d) You are a Specific Participant if you are neither subject to supervision in your jurisdiction nor listed on a stock exchange.

(e) You must comply with the below criteria on an ongoing basis in order to participate in the Euroclear System:

- adequate financial resources
- operational and technological capacity
- legal capacity
- internal control and risk management
- ethical standards

Criteria

You demonstrate adequate financial resources to run your business on a going concern basis and meet your obligations towards us, the Euroclear System and its Participants. This includes:

For All Participants For Specific Participants

- your current resources and your ability to maintain adequate financial resources on an ongoing basis, having regard to your activities and the environment in which you operate
- you provide your annual reports for the two preceding years, and those of your direct and ultimate parent companies and you provide these statements on an annual basis as long as you remain a Participant - either you also provide your semi-annual financial statements, or
- you confirm the absence of adverse change to your financial condition since the last financial statements

You have adequate operational and technological capacity to participate in the Euroclear System and to ensure business continuity and avoid material adverse impact on the integrity of the Euroclear System. This includes:

For All Participants For Specific Participants

- you have adequate human resources, facilities and infrastructure to use the Euroclear System effectively
- you can comply with the security requirements necessary for the safety of the Euroclear System and the confidentiality of the information provided through the Euroclear System
- you can install, operate and maintain the necessary communication platforms with the Euroclear System
- you have adequate back-up facilities and contingency plans for maintaining operational capabilities in contingency situations - you demonstrate you have adequate internal procedures and controls (ISAE 3402 report or equivalent external report), or
- you provide adequate evidence of your business continuity plans and operational readiness (including sourcing policies if relevant)

You demonstrate your legal capacity and ability to accept and comply with the Terms and Conditions governing use of the Euroclear System (i.e. the rules of the securities settlement system in the meaning of the Settlement Finality Directive). This includes:

For All Participants For Specific Participants

- you are duly incorporated in your country of permanent establishment (articles of association, by-laws, extract of your national legal entities registry)
- you are duly licensed and supervised to carry out your business - you also execute a set of representations and warranties to confirm the absence of legal impediment for you to participate in the Euroclear System. A specific form is available.

You have an appropriate internal control and risk management framework in place that is such as to preserve the integrity and reputation of the Euroclear System. This includes:

For All Participants For Specific Participants

- your internal control and risk management framework is commensurate with your risk profile, capital strength and business strategy
- you have no business practices or any other factor that would adversely reflect on your internal controls and risk management
- your business activities do not generate unacceptable risks for the Euroclear System or for us - you also provide adequate documentation on your internal control and risk management framework
- you advise us of any material change in the internal control and risk management framework as long as you remain a Participant

You have implemented adequate ethical standards that are such as to protect the integrity and reputation of the Euroclear System. This includes:

For All Participants For Specific Participants

- if you are subject to anti-money laundering and terrorism financing regulations, your ability to demonstrate an adequate anti-money laundering program which includes a procedural framework, Know Your Customer (KYC) measures, beneficial owners and Politically Exposed Persons (PEPs) identification and monitoring of client activities
- your adhesion to high standards for fighting fraud, bribery, market abuse and conflicts of interest
- your management's reputation is adequate - you also provide appropriate evidence of your internal code of ethics which should cover fraud, bribery, acceptance of gifts, conflicts of interest and prevention of market abuse

We apply a risk-based approach and therefore, we take relevant legal, operational or financial risk factors into account for the protection of the security, integrity or reputation of the Euroclear System, its Participants or us. For instance, your participation in the Euroclear System cannot result in us being in breach of any law, order or regulation, and should not expose us to any additional reporting, disclosure or other legal, tax or regulatory requirements. We may also impose additional conditions on applicants to avoid that we become exposed to any such requirements.

(f) You acknowledge you must meet the above admission criteria on an ongoing basis.

You must notify us in writing, with appropriate supporting documents, of any material event or changes which may affect the information supplied by you as part of your application or which may affect your ability to comply with the criteria listed above. Such events or changes may include, but are not limited to:

- your activity
- your corporate and ownership structure

- your corporate object
- your legal capacity
- the extent or the validity of the signatory powers of your representatives
- your operational or technical organisation,
- any new contractual arrangement, such as an outsourcing
- any law, decree, regulation, governmental order, court decision, measures imposed by your competent authorities
- a material case of fraud.

You also agree to comply with any request, which we may reasonably make from time to time, for additional documentation which may evidence such continued compliance or to carry out additional tests in relation to your technical and operational capacity.

(g) Our admission policy is set by the Board of Euroclear Bank. You must meet our admission criteria so that we can comply with applicable regulatory requirements.

We will at all times look to protect the integrity of the Euroclear System as a wholesale securities settlement system with a broad variety of Participants. We may therefore adapt the above criteria in accordance with Section 1.2 and upon the decision of the Euroclear Bank Management Committee, in order to take into consideration any relevant risk for us, the Euroclear System or its Participants.

(h) We may admit you into the Euroclear System for a particular service and not our full service offering. If this is the case we may:

- refuse to process Instructions which are inconsistent with limitations we place on you as a result of your limited participation
- take any actions required to implement the limitations
- adequate financial resources - You demonstrate adequate financial resources to run your business on a going concern basis and meet your obligations towards us, the Euroclear System and its Participants. This includes:
 - your current resources and your ability to maintain adequate financial resources on an ongoing basis, having regard to your activities and the environment in which you operate
 - you provide your annual reports for the two preceding years, and those of your direct and ultimate parent companies and you provide these statements on an annual basis as long as you remain a Participant
- operational and technological capacity - You have adequate operational and technological capacity to ensure business continuity and avoid material adverse impact on the integrity of the Euroclear System. This includes:
 - you have adequate human resources, facilities and infrastructure to use the Euroclear System effectively
 - you can comply with the security requirements necessary for the safety of the Euroclear System
 - you can install, operate and maintain the necessary communication platforms with the Euroclear System
 - you have adequate back-up facilities and contingency plans for maintaining operational capabilities in contingency situations
- legal capacity - You demonstrate your legal capacity and ability to accept and comply with the rules of the Euroclear System. This includes:
 - you are duly incorporated in your country of permanent establishment (articles of association, by-laws, extract of your national legal entities registry)
 - you are duly licensed and supervised to carry out your business
- internal control and risk management - You have an appropriate internal control and risk management framework in place that is such as to preserve the integrity and reputation of the Euroclear System. This includes:
 - your internal control and risk management framework is commensurate with your risk profile, capital strength and business strategy
 - you have no business practices or any other factor that would adversely reflect on your internal controls and risk management
 - your business activities do not generate unacceptable risks for the Euroclear System or for us
- ethical standards - You have implemented ethical standards that are such as to protect the integrity and reputation of the Euroclear System. This includes:
 - if you are subject to anti-money laundering and terrorism financing regulations, your ability to demonstrate an adequate anti-money laundering program which includes a procedural framework, Know Your Customer (KYC) measures, beneficial owners and Politically Exposed Persons (PEPs) identification and monitoring of client activities
 - your adhesion to high standards for fighting fraud, bribery, market abuse and conflicts of interest
 - your management's reputation is adequate

The above requirements are the basic requirements for all Participants.

Clients are considered 'Standard Participants' if they:

- are licensed as a credit institution or investment firm, whether or not in the EU

- are a public authority or a publicly guaranteed undertaking
- fall under the supervision of a competent authority in the meaning of the EBA (1093/2010), EIOPA (1094/2010), ESMA (1095/2010) or EMIR (648/2012) regulations.

There are additional eligibility requirements for clients who are:

- Specific Regulated Participants, i.e. are subject to supervision in a jurisdiction outside the EU or are listed on a stock exchange; or
- Specific Participants, i.e. are neither subject to supervision in their jurisdiction nor listed on a stock exchange.

Further information is provided in section 2.1.2 (e) of the Operating Procedures.

) We will consider you for your admission in the Euroclear System as either

- a Standard Participant
- a Specific Regulated Participant
- a Specific Participant

depending on your regulatory status and/or place of permanent establishment.

This categorisation is by virtue of the Belgian legislation implementing the Settlement Finality Directive. Specific Regulated Participants and Specific Participants must comply with specific additional requirements to mitigate potential additional risks resulting from their participation in the Euroclear System.

You must bring appropriate evidence enabling us to adequately consider and handle your application. All documents related to your application must be in English. We will treat your application promptly, as further detailed in Section 2.1.3.

However, once admitted, all Participants have the same rights and obligations towards Euroclear Bank as operator of the Euroclear System irrespective of their categorisation which is relevant only for the admission process.

(b) You are a Standard Participant if either:

- you are licensed as a credit institution or investment firm, whether or not in the EU
- you are a public authority or a publicly guaranteed undertaking, whether or not in the EU
- you are located in the EU and licensed as a CSD in the meaning of CSDR
- you are located in the EU and licensed as a central counterparty in the meaning of EMIR
- you otherwise fall under the supervision of a competent authority in the meaning of the EBA Regulation, the EIOPA Regulation, the ESMA Regulation or EMIR.

(c) You are a Specific Regulated Participant if either:

- you are subject to supervision in a jurisdiction outside the EU (other than as a credit institution or investment firm), or
- you are listed on a stock exchange.

(d) You are a Specific Participant if you are neither subject to supervision in your jurisdiction nor listed on a stock exchange.

(e) You must comply with the below criteria on an ongoing basis in order to participate in the Euroclear System:

- adequate financial resources
- operational and technological capacity
- legal capacity
- internal control and risk management
- ethical standards

Criteria

You demonstrate adequate financial resources to run your business on a going concern basis and meet your obligations towards us, the Euroclear System and its Participants. This includes:

For All Participants For Specific Participants

- your current resources and your ability to maintain adequate financial resources on an ongoing basis, having regard to your activities and the environment in which you operate
- you provide your annual reports for the two preceding years, and those of your direct and ultimate parent companies and you provide these statements on an annual basis as long as you remain a Participant - either you also provide your semi-annual financial statements, or
- you confirm the absence of adverse change to your financial condition since the last financial statements

You have adequate operational and technological capacity to participate in the Euroclear System and to ensure business continuity and avoid material adverse impact on the integrity of the Euroclear System. This includes:

For All Participants For Specific Participants

- you have adequate human resources, facilities and infrastructure to use the Euroclear System effectively
- you can comply with the security requirements necessary for the safety of the Euroclear System and the confidentiality of the information provided through the Euroclear System
- you can install, operate and maintain the necessary communication platforms with the Euroclear System
- you have adequate back-up facilities and contingency plans for maintaining operational capabilities in contingency situations - you demonstrate you have adequate internal procedures and controls (ISAE 3402 report or equivalent external report), or
- you provide adequate evidence of your business continuity plans and operational readiness (including sourcing policies if relevant)

You demonstrate your legal capacity and ability to accept and comply with the Terms and Conditions governing use of the Euroclear System (i.e. the rules of the securities settlement system in the meaning of the Settlement Finality Directive). This includes:

For All Participants For Specific Participants

- you are duly incorporated in your country of permanent establishment (articles of association, by-laws, extract of your national legal entities registry)
- you are duly licensed and supervised to carry out your business - you also execute a set of representations and warranties to confirm the absence of legal impediment for you to participate in the Euroclear System. A specific form is available.

You have an appropriate internal control and risk management framework in place that is such as to preserve the integrity and reputation of the Euroclear System. This includes:

For All Participants For Specific Participants

- your internal control and risk management framework is commensurate with your risk profile, capital strength and business strategy
- you have no business practices or any other factor that would adversely reflect on your internal controls and risk management
- your business activities do not generate unacceptable risks for the Euroclear System or for us - you also provide adequate documentation on your internal control and risk management framework
- you advise us of any material change in the internal control and risk management framework as long as you remain a Participant

You have implemented adequate ethical standards that are such as to protect the integrity and reputation of the Euroclear System. This includes:

For All Participants For Specific Participants

- if you are subject to anti-money laundering and terrorism financing regulations, your ability to demonstrate an adequate anti-money laundering program which includes a procedural framework, Know Your Customer (KYC) measures, beneficial owners and Politically Exposed Persons (PEPs) identification and monitoring of client activities
- your adhesion to high standards for fighting fraud, bribery, market abuse and conflicts of interest
- your management's reputation is adequate - you also provide appropriate evidence of your internal code of ethics which should cover fraud, bribery, acceptance of gifts, conflicts of interest and prevention of market abuse

We apply a risk-based approach and therefore, we take relevant legal, operational or financial risk factors into account for the protection of the security, integrity or reputation of the Euroclear System, its Participants or us. For instance, your participation in the Euroclear System cannot result in us being in breach of any law, order or regulation, and should not expose us to any additional reporting, disclosure or other legal, tax or regulatory requirements. We may also impose additional conditions on applicants to avoid that we become exposed to any such requirements.

(f) You acknowledge you must meet the above admission criteria on an ongoing basis.

You must notify us in writing, with appropriate supporting documents, of any material event or changes which may affect the information supplied by you as part of your application or which may affect your ability to comply with the criteria listed above. Such events or changes may include, but are not limited to:

- your activity
- your corporate and ownership structure
- your corporate object
- your legal capacity
- the extent or the validity of the signatory powers of your representatives
- your operational or technical organisation,
- any new contractual arrangement, such as an outsourcing
- any law, decree, regulation, governmental order, court decision, measures imposed by your competent authorities
- a material case of fraud.

You also agree to comply with any request, which we may reasonably make from time to time, for additional documentation which may evidence such continued compliance or to carry out additional tests in relation to your technical and operational capacity.

(g) Our admission policy is set by the Board of Euroclear Bank. You must meet our admission criteria so that we can comply with applicable regulatory requirements.

We will at all times look to protect the integrity of the Euroclear System as a wholesale securities settlement system with a broad variety of Participants. We may therefore adapt the above criteria in accordance with Section 1.2 and upon the decision of the Euroclear Bank Management Committee, in order to take into consideration any relevant risk for us, the Euroclear System or its Participants.

(h) We may admit you into the Euroclear System for a particular service and not our full service offering. If this is the case we may:

- refuse to process Instructions which are inconsistent with limitations we place on you as a result of your limited participation
- take any actions required to implement the limitations.

17q. If you have selected "Other entities" above, please explain:

The type of clients benefiting from our services include global and local custodians, broker dealers, central banks, commercial and investment banks, investment managers, supranational organisations, retail investors and a wide range of issuers.

17r. Indicate how many "Other entities" are currently participants?

Euroclear Bank has around 1,500 Participants. We do not publish a breakdown of our client base.

17s. Please select the features included in the eligibility requirements for the participants referred to above as "Other entities". (Choose all that apply.)

- Financial Thresholds (please answer 17t)
- Regulatory Oversight (please answer 17t)
- Market Experience (please answer 17t)
- Other (please answer 17u)

17t. Where can a description of the specific eligibility requirements for participants described above as "Other entities" be found?

You can find this in section 2.1 'Requirements to become a Participant' of the 'Operating Procedures of the Euroclear System' attached.

17u. If other, please explain:

As set forth in section 2.1.2 (e) of the Operating Procedures, Participants must comply with the below criteria on an ongoing basis in order to participate in the Euroclear System:

(a) We will consider you for your admission in the Euroclear System as either

- a Standard Participant
- a Specific Regulated Participant
- a Specific Participant

depending on your regulatory status and/or place of permanent establishment.

This categorisation is by virtue of the Belgian legislation implementing the Settlement Finality Directive. Specific Regulated Participants and Specific Participants must comply with specific additional requirements to mitigate potential additional risks resulting from their participation in the Euroclear System.

You must bring appropriate evidence enabling us to adequately consider and handle your application. All documents related to your application must be in English. We will treat your application promptly, as further detailed in Section 2.1.3.

However, once admitted, all Participants have the same rights and obligations towards Euroclear Bank as operator of the Euroclear System irrespective of their categorisation which is relevant only for the admission process.

(b) You are a Standard Participant if either:

- you are licensed as a credit institution or investment firm, whether or not in the EU
- you are a public authority or a publicly guaranteed undertaking, whether or not in the EU
- you are located in the EU and licensed as a CSD in the meaning of CSDR
- you are located in the EU and licensed as a central counterparty in the meaning of EMIR
- you otherwise fall under the supervision of a competent authority in the meaning of the EBA Regulation, the EIOPA Regulation, the ESMA Regulation or EMIR.

(c) You are a Specific Regulated Participant if either:

- you are subject to supervision in a jurisdiction outside the EU (other than as a credit institution or investment firm), or
- you are listed on a stock exchange.

(d) You are a Specific Participant if you are neither subject to supervision in your jurisdiction nor listed on a stock exchange.

(e) You must comply with the below criteria on an ongoing basis in order to participate in the Euroclear System:

- adequate financial resources
- operational and technological capacity
- legal capacity
- internal control and risk management
- ethical standards

Criteria

You demonstrate adequate financial resources to run your business on a going concern basis and meet your obligations towards us, the Euroclear System and its Participants. This includes:

For All Participants For Specific Participants

- your current resources and your ability to maintain adequate financial resources on an ongoing basis, having regard to your activities and the environment in which you operate
- you provide your annual reports for the two preceding years, and those of your direct and ultimate parent companies and you provide these statements on an annual basis as long as you remain a Participant - either you also provide your semi-annual financial statements, or
- you confirm the absence of adverse change to your financial condition since the last financial statements

You have adequate operational and technological capacity to participate in the Euroclear System and to ensure business continuity and avoid material adverse impact on the integrity of the Euroclear System. This includes:

For All Participants For Specific Participants

- you have adequate human resources, facilities and infrastructure to use the Euroclear System effectively
- you can comply with the security requirements necessary for the safety of the Euroclear System and the confidentiality of the information provided through the Euroclear System
- you can install, operate and maintain the necessary communication platforms with the Euroclear System
- you have adequate back-up facilities and contingency plans for maintaining operational capabilities in contingency situations - you demonstrate you have adequate internal procedures and controls (ISAE 3402 report or equivalent external report), or
- you provide adequate evidence of your business continuity plans and operational readiness (including sourcing policies if relevant)

You demonstrate your legal capacity and ability to accept and comply with the Terms and Conditions governing use of the Euroclear System (i.e. the rules of the securities settlement system in the meaning of the Settlement Finality Directive). This includes:

For All Participants For Specific Participants

- you are duly incorporated in your country of permanent establishment (articles of association, by-laws, extract of your national legal entities registry)

- you are duly licensed and supervised to carry out

your business - you also execute a set of representations and warranties to confirm the absence of legal impediment for you to participate in the Euroclear System. A specific form is available.

You have an appropriate internal control and risk management framework in place that is such as to preserve the integrity and reputation of the Euroclear System. This includes:

For All Participants For Specific Participants

- your internal control and risk management framework is commensurate with your risk profile, capital strength and business strategy

- you have no business practices or any other factor that would adversely reflect on your internal controls and risk management

- your business activities do not generate unacceptable risks for the Euroclear System or for

us - you also provide adequate documentation on your internal control and risk management framework

- you advise us of any material change in the internal control and risk management framework as long as you remain a Participant

You have implemented adequate ethical standards that are such as to protect the integrity and reputation of the Euroclear System. This includes:

For All Participants For Specific Participants

- if you are subject to anti-money laundering and terrorism financing regulations, your ability to demonstrate an adequate anti-money laundering program which includes a procedural framework, Know Your Customer (KYC) measures, beneficial owners and Politically Exposed Persons (PEPs) identification and monitoring of client activities

- your adherence to high standards for fighting fraud, bribery, market abuse and conflicts of interest

- your management's reputation is adequate - you also provide appropriate evidence of your internal code of ethics which should cover fraud, bribery, acceptance of gifts, conflicts of interest and prevention of market abuse

We apply a risk-based approach and therefore, we take relevant legal, operational or financial risk factors into account for the protection of the security, integrity or reputation of the Euroclear System, its Participants or us. For instance, your participation in the Euroclear System cannot result in us being in breach of any law, order or regulation, and should not expose us to any additional reporting, disclosure or other legal, tax or regulatory requirements. We may also impose additional conditions on applicants to avoid that we become exposed to any such requirements.

(f) You acknowledge you must meet the above admission criteria on an ongoing basis.

You must notify us in writing, with appropriate supporting documents, of any material event or changes which may affect the information supplied by you as part of your application or which may affect your ability to comply with the criteria listed above. Such events or changes may include, but are not limited to:

- your activity
- your corporate and ownership structure
- your corporate object
- your legal capacity
- the extent or the validity of the signatory powers of your representatives
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- any new contractual arrangement, such as an outsourcing
- any law, decree, regulation, governmental order, court decision, measures imposed by your competent authorities
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- refuse to process Instructions which are inconsistent with limitations we place on you as a result of your limited participation
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· adequate financial resources - You demonstrate adequate financial resources to run your business on a going concern basis and meet your obligations towards us, the Euroclear System and its Participants. This includes:

- your current resources and your ability to maintain adequate financial resources on an ongoing basis, having regard to your activities and the environment in which you operate
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- operational and technological capacity - You have adequate operational and technological capacity to ensure business continuity and avoid material adverse impact on the integrity of the Euroclear System. This includes:
 - you have adequate human resources, facilities and infrastructure to use the Euroclear System effectively
 - you can comply with the security requirements necessary for the safety of the Euroclear System
 - you can install, operate and maintain the necessary communication platforms with the Euroclear System
 - you have adequate back-up facilities and contingency plans for maintaining operational capabilities in contingency situations
 - legal capacity - You demonstrate your legal capacity and ability to accept and comply with the rules of the Euroclear System. This includes:
 - you are duly incorporated in your country of permanent establishment (articles of association, by-laws, extract of your national legal entities registry)
 - you are duly licensed and supervised to carry out your business
 - internal control and risk management - You have an appropriate internal control and risk management framework in place that is such as to preserve the integrity and reputation of the Euroclear System. This includes:
 - your internal control and risk management framework is commensurate with your risk profile, capital strength and business strategy
 - you have no business practices or any other factor that would adversely reflect on your internal controls and risk management
 - your business activities do not generate unacceptable risks for the Euroclear System or for us
 - ethical standards - You have implemented ethical standards that are such as to protect the integrity and reputation of the Euroclear System. This includes:
 - if you are subject to anti-money laundering and terrorism financing regulations, your ability to demonstrate an adequate anti-money laundering program which includes a procedural framework, Know Your Customer (KYC) measures, beneficial owners and Politically Exposed Persons (PEPs) identification and monitoring of client activities
 - your adherence to high standards for fighting fraud, bribery, market abuse and conflicts of interest
 - your management's reputation is adequate

The above requirements are the basic requirements for all Participants.

Clients are considered 'Standard Participants' if they:

- are licensed as a credit institution or investment firm, whether or not in the EU
- are a public authority or a publicly guaranteed undertaking
- fall under the supervision of a competent authority in the meaning of the EBA (1093/2010), EIOPA (1094/2010), ESMA (1095/2010) or EMIR (648/2012) regulations.

There are additional eligibility requirements for clients who are:

- Specific Regulated Participants, i.e. are subject to supervision in a jurisdiction outside the EU or are listed on a stock exchange; or
- Specific Participants, i.e. are neither subject to supervision in their jurisdiction nor listed on a stock exchange.

Further information is provided in section 2.1.2 (e) of the Operating Procedures.

18. Are participants required to contribute capital to the depository that would result in ownership of the depository?

- Yes (please answer 18a)
- No
- Not applicable
- Other (please answer 18b)

19. Are prospective participants subject to an initial review and approval process regarding compliance with eligibility

requirements?

- Yes
- No
- Not applicable
- Other (please answer 19a)

Conditions of Participation

20. What governs the relationship between the depository and the participants? (Choose all that apply.)

- Relevant law and regulation
- Standard participation contract
- Established terms and conditions of participation
- Bye-laws of the depository
- Rules of the depository
- Other (please answer 20a)
- Not applicable

Response Necessary/Eligibility Question

21. Rule 17f-7 requires that an Eligible Securities Depository “holds assets for the custodian that participates in the system on behalf of the Fund under safekeeping conditions no less favorable than the conditions that apply to other participants.”

Please confirm that assets of foreign investors held by custodians as participants in the depository are held under safekeeping conditions no less favorable than the conditions that apply to other participants.

- Yes (please answer 21b)
- No (please answer 21a)
- Not applicable (please answer 21a)
- Other (please answer 21a)

21b. Please confirm the basis for the arrangements in place to ensure that the assets you hold for custodians receive the same level of safekeeping protection as the assets held for other categories of participants. (Choose all that apply.)

- Relevant Law and Regulation (please answer 21d)
- Standard participation contract (please answer 21d)
- Established terms and conditions of participation (please answer 21d)
- By-laws of the depository (please answer 21d)
- Rules of the depository (please answer 21d)
- Other (please answer 21c)

21d. For each item in Question 21b that you checked, please briefly supply references or citations to the law(s), regulation(s), or depository rule(s), participation condition(s), or participant contract provision(s), as applicable.

Securities deposited in Euroclear Bank by clients are protected by Royal Decree No. 62, which does not distinguish between Euroclear Bank clients who act as custodians and other profiles.

In addition, our contractual relationship with our clients is governed by

- the Terms and Conditions Governing Use of Euroclear
- The Operating Procedures of the Euroclear System.

These contractual documents do not distinguish between the different profiles of Euroclear Bank clients.

22. How does the depository notify participants of material changes to the conditions of participation? (Choose all that apply.)

- By e-mail
- By telephone
- By public announcement
- By press release
- Other (please answer 22a)
- Not applicable

22a. Please explain:

We notify you of the changes to the contractual agreements via email. Please register via the News & Updates app on MyEuroclear (my.euroclear.com)

Governance of Participants**23. Who enforces compliance with the depository's conditions of participation? (Choose all that apply.)**

- The depository
- The exchange
- The depository's regulator
- Other (please answer 23a)
- Not applicable

23a. Please explain:**24. What enforcement actions are available to the enforcement authority? (Choose all that apply.)**

- Fines
- Restrictions on participation
- Suspension of participation
- Termination of participation
- Other (please answer 24a)
- Not applicable

25. Has there been any such enforcement actions in the last three years?

- Yes (please answer 25a)
- No
- Not applicable
- Other (please answer 25b)

25b. If other, please explain:

Due to client confidentiality, we are not in a position to disclose such information, if any.

DEPOSITORY FUNCTIONALITY AND SERVICES; USE OF AGENTS

Certain functionalities and services reduce risk to an investor if provided in an efficient manner. The purpose of this section is to identify those functionalities that may potentially be offered by depositories and clearing systems around the world, and ascertain whether they are offered by your institution.

26. For which of the following security types do you serve as a depository or clearing system? (Choose all that apply.)

- Government securities
- Equities
- Corporate bonds
- Corporate money market instruments
- Others (please answer 26a)
- Not applicable

26a. Please name the other security types:

Warrants, depository receipts, Investment funds, Certificates of deposit, and Exchange-Traded Funds (ETFs).

27. Is the use of the depository in your market compulsory by law or compulsory by market practice for the settlement or safekeeping of all instrument types in your market (e.g. equities, government securities, corporate bonds, money market instruments, warrants, derivatives etc). (Choose all that apply.)

- Yes by law for settlement of all instrument types (please answer 27a)
- Yes by law for safekeeping of all instrument types (please answer 27a)
- Yes by market practice for settlement of all instrument types (please answer 27b)
- Yes by market practice for safekeeping of all instrument types (please answer 27b)
- Yes by law for settlement, but not for all instrument types (please answer 27a)
- Yes by law for safekeeping, but not for all instrument types (please answer 27a)
- Yes by market practice for settlement, but not for all instrument types (please answer 27b)
- Yes by market practice for safekeeping, but not for all instrument types (please answer 27b)
- Neither/other (please answer 27c)

27c. If neither/other, please explain:

The use of Euroclear Bank is not compulsory by law or compulsory by market practice for the settlement or safekeeping of any instrument types. Euroclear Bank provides International Central Securities Depository (ICSD) services and is the settlement platform for international and domestic securities markets.

28. Settlement and Safekeeping Percentages

28a. Please list by instrument type the percentage of the total market in your jurisdiction (either volume or value) settled within your institution, exclusive of your links with third parties.

Euroclear Bank does not estimate market share as we feel that market providers do not always provide comparable statistics.

For key Euroclear statistics, including the number of netted transactions, please see the following page on our main website: <https://www.euroclear.com/en/about/Our-business/key-statistics.html>

28b. Please list by instrument type the percentage of the total market in your jurisdiction (either volume or value) held in safekeeping within your institution.

Euroclear Bank does not estimate market share as we feel that market providers do not always provide comparable statistics.

For key Euroclear statistics, including the number of netted transactions, please see the following page on our main website: <https://www.euroclear.com/about/en/business/Keymetrics.html>.

29. Are there any activities performed by a third party on behalf of the depository for the depository participants (e.g., vaulting of physical securities, registration, entitlement processing, etc.)?

- Yes (please answer 29a)
- No
- Not applicable
- Other (please answer 29i)

29a. If third parties are employed, please indicate which services they supply (then please answer 29b):

For certain aspects of the services we offer to our clients, we use external service providers such as data vendors, depositories, cash correspondents and transfer agents.

Services carried out by depositories and other agents include:

- custody of securities
- safekeeping of physical securities
- registration

- processing of external settlement instructions
- receiving securities from and delivering them out of the Euroclear System
- providing a link with local markets
- taking actions required for custody operations, including collection of income and redemption proceeds, assistance in obtaining withholding tax relief, management of options, offers and mandatory events, distribution of compensation, voting of securities, assistance in compliance with legal requirements, and portfolio valuation and other instructions
- any other activities for which such agents would or could be appointed by Euroclear Bank S.A./N.V

29b. If third parties are employed, does the depository assume liability for losses incurred by participants as a result of the actions/inactions of the third parties?

Yes (please answer 29c)

No

30. Has any participant suffered any losses in the past three years due to the depository's performance?

Yes (please answer 30a)

No

Not applicable

Other (please answer 30m)

30c. Corporate Action. Please specify total loss in USD:

30e. Settlement Process - Securities. Please specify total loss in USD:

30g. Settlement Process - Cash. Please specify total loss in USD:

30i. System Outage. Please specify total loss in USD:

30k. For Other, please specify number of instances:

30l. For Other, please specify total loss in USD:

30m. If other, please explain:

For confidentiality reasons we are not in a position to provide such information.

Other Services

31. Who accepts cash deposits (or makes payment credit accommodations) for depository transactions? (Choose all that apply.)

Depository

Central Bank

Banks appointed by depository (please answer 31a)

Neither/others (e.g. credit lines used please answer 31b)

Not applicable

31a. Please name banks:

For a list of cash correspondents appointed by Euroclear Bank, please refer to 'Quick Cash Card' attached.

32. Who processes cash clearing (or draws on credit lines, if applicable) for depository transactions? (Choose all that apply.)

- Depository
- Central Bank
- Banks appointed by depository (please answer 32a)
- Neither/others (please answer 32b)
- Not applicable

32a. Please name banks appointed by depository:

For a list of cash correspondents appointed by Euroclear Bank, please refer to 'Quick Cash Card' attached.

33. Who controls the movement of cash for cash deposits (or draws on credit lines, if applicable)? (Choose all that apply.)

- Depository
- Central Bank
- Banks appointed by depository (please answer 33a)
- Neither/others (please answer 33b)
- Not applicable

33a. Please name banks appointed by depository:

For a list of cash correspondents appointed by Euroclear Bank, please refer to 'Quick Cash Card' attached.

34. Who controls the movement of cash for cash clearing (or for draws on credit lines, if applicable)? (Choose all that apply.)

- Depository
- Central Bank
- Banks appointed by depository. (please answer 34a)
- Neither/others (please answer 34b)
- Not applicable

34a. Please name banks appointed by depository:

For a list of cash correspondents appointed by Euroclear Bank, please refer to 'Quick Cash Card' attached.

35. Please indicate services you provide. (Choose all that apply.)

- Information in advance on corporate (annual or special) meetings in order that owners can vote.
- Tax assistance where foreign holders may be entitled to tax relief at source or through a claim.
- In order to avoid fails, an automatic securities lending facility - if requested - is provided for. (please answer 35a)
- Collateral handling in support of activities including securities lending, overdraft coverage, cash management, repurchase agreements, etc. Please provide details. (please answer 35c)
- Same day turnaround settlements.
- Information on distribution of new issues (IPO, Privatization).
- Other (please answer 35d)
- Not applicable

35a. Automatic securities lending facility is provided for: (Choose all that apply.)

- Brokers
- Banks
- Other financial institutions
- Other (please answer 35b)

35b. If other please explain:

Our Securities and Lending Programme is aimed solely at providing liquidity for Euroclear's settlement activity. Our fail-driven Securities Lending and Borrowing Programme is open to all participants for them to participate as automatic securities lenders.

35c. Collateral Handling: please provide details:

Euroclear Bank offers collateral management services to clients to collateralise exposures across products, instruments and counterparties using a single collateral pool. Euroclear Bank collateral management products include the following:

- Triparty Repo
- Triparty Securities Lending
- Triparty Secured Loans
- Triparty Derivatives Support
- Triparty Collateral Services
- Collateral Allocation Interface

In addition the following services can be offered by us:

- Initial margin solution
- DTCC Euroclear Global Collateral
- Collateral re-use
- Open Inventory Sourcing
- Third-party pledge holder accounts
- Triparty Interoperability
- Optimisation
- €GCPlus
- Eurex clearing service for securities lending

Collateral management services include:

- deal matching
- collateral eligibility verification and selection
- delivery against or free of payment of collateral
- daily mark-to-market functions
- collateral substitution
- margin maintenance
- custody event management
- reporting

Collateral management services are available during the batch and the real-time processes.

Collateralised loans in our securities lending programmes.

All loans in our GC Access and Securities Lending and Borrowing programmes are fully collateralised. Collateral delivered for GC Access loans is transferred from the borrower to Euroclear Bank under a first ranking pledge and from Euroclear Bank to the Lender under a first ranking pledge. The collateral is held in an account in the name of the Lender. For SLB loans, collateral is earmarked under a first ranking pledge.

Euroclear Bank will perform a daily mark-to market of the value of the loan and of the collateral securities to ensure that at any time there is sufficient collateral in line with Euroclear's collateral criteria (including haircuts, loan add-ons, cross-currency margins, concentration limits, etc) to cover the loan exposures. Additional collateral required is automatically selected, posted or blocked when needed.

35d. If other services, please explain:

As an ICSD, we provide the following core services and sub-services:

- securities settlement (equities and debt)
- funds order processing
- asset servicing including full custody and tax services
- asset optimisation through securities lending and borrowing, money transfer and integrated collateral management services.

36. What procedures are in place for the processing of corporate action entitlements? (Choose all that apply.)

- Credited to the securities account on the day indicated below regardless of whether actually collected by the depository on the scheduled date. (please answer 36a)
- Credited to the securities account upon actual receipt by the depository.
- Corporate action entitlements are handled by an entity separate from the depository. (please answer 36c)
- Not applicable
- Other (please answer 36d)

36d. If other, please explain:

If the relevant corporate action entitlements are not eligible in the Euroclear System, they would be credited or delivered outside the Euroclear System based on instructions received from the relevant Participant.

37. What procedures are in place for the processing of interest and dividends?(Choose all that apply.)

- Credited to the cash account on the day indicated below regardless of whether actually collected by the depository on the scheduled date. (please answer 37a)
- Credited to the cash account upon actual receipt by the depository.
- Income and dividend collection is handled by an entity separate from the depository. (please answer 37c)
- Not applicable
- Other (please answer 37d)

37a. Credited to the cash account: (Choose all that apply.)

- On pay date.
- On pay date +1.
- On pay date +2.
- Other (please answer 37b)

37b. If other please explain:

Income payments are credited once a day at the beginning of the batch process.

We either:

- advance the payment on the expected value date (on-time payment)
- wait until receipt and reconciliation of funds (deferred payment)

In the majority of cases, we credit proceeds during the batch process that precedes the expected value date of the payment date (advance payment). This provisional cash credit becomes final upon receipt and reconciliation of funds. Credit can be reversed if timely payment is not received from the issuer.

Cash proceeds for fixed income securities from investment grade rated issues or issuers, i.e. those rated equal to or higher than BBB-(FitchRatings/Standard & Poor's) or Baa3 (Moody's), are generally advanced.

Linkages With Other Central Securities Depositories (CSD) or International Central Securities Depositories (ICSD)

38. Please list all depositories or settlement systems to which you have an electronic link.

We have electronic links to all our depositaries (sub-custodians) and cash correspondents. You can find a list of sub-custodians/CSDs on our website my.euroclear.com> Market directory.

39. Are procedures and controls (firewalls) in place to avoid systemic collapse or contamination if one of the linked entities should experience business interruptions for whatever reason?

- Yes (please answer 39a)
- No (please answer 39a)
- Other (please answer 39a)
- Not applicable

39a. Please explain:

The service level agreements we have with third parties (communication providers, cash correspondents, depositaries, etc.) contain detailed contingency and escalation procedures. And we monitor these service levels on an on-going basis.

Technically, the connections with the linked entities are set up in an isolated zone, and each connection is separated from the internal network by a firewall.

Our crisis plans also include an action-oriented checklist for the tactical team to respond to the potential failure of a depository (sub-custodian). Depending on the type of scenario (e.g. isolated or market failure), this plan includes a set of actions aimed at minimising the impact on our clients and ensuring a swift move of business to another third party.

40. Has a business interruption recovery plan been developed in the event the linkages should become inoperable for any reason?

- Yes
- No (please answer 40a)
- Other (please answer 40a)
- Not applicable

ACCOUNT STRUCTURES AND RECORDKEEPING

The purpose of this section is to identify the nature of accounts; the naming convention is employed, the level of segregation achieved, accessibility in the event of bankruptcy and the frequency of reporting generated from them.

41. Are participants permitted to maintain more than one account at the depository?

- Yes (please answer 41a)
- No
- Not applicable
- Other (please answer 41d)

41a. If yes, please indicate number: (Choose one.)

- An unlimited number of accounts.
- More than one account (please answer 41b and indicate how many)
- Other (e.g. subaccounts) (please answer 41c)

42. Are participants required/permitted to segregate assets held for their own benefit from those they hold for their clients?

- Yes (please answer 42a)
- No
- Not applicable
- Other (please answer 42d)

42a. If yes, is segregation required or simply permitted?

- Required (please answer 42b)
- Permitted (please answer 42b)
- Other (please answer 42e)

42b. How does segregation occur? (Choose all that apply.)

- By separately designated participant accounts.
- By sub-accounts within a single participant account.
- By separately designated beneficial owner accounts.
- Other - e.g. share registration (please answer 42c)

43. Does the depository permit its participants to open accounts in the participant's own nominee name(s)?

- Yes (please answer 43a)
- No
- Other (please answer 43b)
- Not applicable

44. In the event a participant's single or main account is blocked for any reason (e.g., insolvency, penalties, violations, liens), would securities held in any account or accounts on behalf of the participant's clients be accessible:

44a. By the participant's clients?

- Yes (please answer 44b)
- No
- Not applicable
- Other (please answer 44c)

44d. By the intervening authorities controlling insolvency or other proceedings?

- Yes (please answer 44e)
- No
- Not applicable
- Other (please answer 44f)

44e. If yes, please describe briefly under what conditions access would be granted to the intervening authorities:

The intervening authorities would have access under circumstances where those authorities were acting in accordance with the applicable law.

44g. By the participant's creditors?

- Yes (please answer 44h)
- No
- Not applicable
- Other (please answer 44i)

44j. By the depository's creditors?

- Yes (please answer 44k)
- No
- Not applicable
- Other (please answer 44l)

45. In what form does the depository maintain records identifying the assets of each participant? (Choose all that apply. Please refer to "Help" for clarification.)

- Computer file (please answer 45b)
- Microfiche (please answer 45b)
- Hard copy (please answer 45b)
- Computer tape (please answer 45b)

Other (please answer 45a)

45b. In which format is the source data maintained?

Computer file.

Response Necessary/Eligibility Question

46. Rule 17f-7 requires that an Eligible Securities Depository “provides periodic reports to its participants with respect to its safekeeping of assets, including notices of transfers to or from any participant's account.”

Does the depository make available periodic safekeeping reports to participants, including notices of transfers to or from the participant's account?

Yes (please answer 46b)

No (please answer 46a and then proceed to 48)

Other (please answer 46a)

46b. If yes, please indicate the scheduled frequency: (Choose one.)

Daily

Weekly

Monthly

Quarterly

Annually

Upon request

Other (please answer 46c)

46c. If other, please explain:

Certain reports showing securities and cash movements to and from Participant accounts are also available in real-time.

For an overview of the settlement and cash reporting available via EasyWay and SWIFT, please refer to the 'Settlement reporting quick card' and 'Cash and credit reporting quick card' attached.

47. What is your document and record retention policy for documents and records described above in this section? (Choose one.)

6 months or less

1 year

3 years

5 years

7 years

Other (please answer 47a)

47a. If other, please explain:

In the course of its activities, Euroclear Bank collects a wide range of data that is retained in accordance with the Belgian data retention regulatory requirements and related governing regulatory requirements that Euroclear Bank is subject to comply with. Data retention principles are addressed through the Retention, Retrieval, and Disposal of Data Policy Handbook. The retention periods differ depending on the information category, e.g. contractual data, client identification data, transaction data, fiscal data, accounting data etc. Euroclear Bank operates under its Central Securities Depositories Regulation (CSDR) licence and therefore complies with Article 29 of the CSDR Regulation (EU) No 909/2014, under which all data in the scope of our CSDR operations will be retained for a period of 10 years. When processing information that includes personal data, Euroclear ensures to retain the data for no longer than strictly necessary/required in accordance with data protection regulatory requirements (GDPR). When destruction of data is required, it is carried out in a way that preserves the confidentiality of any information they contain. The disposal of a data means its complete erasure so that it can no longer be read and restored.

SETTLEMENTS

The purpose of this section is to identify the model of settlement employed, the relationship between cash and securities, and the basis on which participants meet their obligations.

48. The Committee on Payment and Settlement Systems of the Bank for International Settlements (BIS) has identified three

common structural approaches or models for linking delivery and payment in a securities settlement system. Please indicate which model your procedures most closely resemble (Please refer to details on the models within the "Help" section located below this question): (Choose all that apply.)

- Model 1 - Gross, Simultaneous Settlements of Securities and Funds Transfers. (please answer 48a)
- Model 2 - Gross Settlements of Securities Transfers Followed by Net Settlement of Funds Transfers. (please answer 48a)
- Model 3 - Simultaneous Net Settlement of Securities and Funds Transfers. (please answer 48a)
- Not applicable
- Other (please answer 48b)

48a. Please briefly describe your settlement process, including how your settlement procedures may vary from the model chosen above (and as described below in the Help section)?

The Euroclear system used by Euroclear Bank is a Model 1 DVP system, because transactions between Participants are settled on a trade-by-trade basis, with simultaneous and final transfers of cash and securities in the books of Euroclear Bank. The system controls the availability of the cash and securities provisions before executing the instructions (i.e. 'positioning'). If the cash and/or the securities are not available, the transaction will not be settled (but will be recycled later on in accordance with the system's rules). If the cash and/or the securities are available, the instructions will settle and the cash and securities will be transferred simultaneously. Settlement over the Bridge with Clearstream also takes place according to DVP Model 1, because there is a simultaneous and final transfer of cash and securities between Euroclear Bank and Clearstream via the mutual cash and securities accounts that each holds with the other after each exchange.

There are several exchanges each night and an Automated Daytime Bridge during the day. External transactions (i.e. transactions that settle in a local market between a Euroclear Participant and a local counterpart, which is typically a member of the local Securities Settlement System (SSS)) follow the DVP rules (if any) of the local market. DVP Model 1 systems often have a single delivery and payment intermediary, except when payments are in central bank money.

Euroclear Bank also offers Free-of-Payment settlement facilities. Free of Payment (FOP) instructions usually cover transactions to which no cash leg is associated neither within nor outside the Euroclear system: i.e. instructions associated with transfers between accounts of a given participant or with reallocation of portfolio between accounts/entities of the same group, realignment of cross-holdings with Clearstream, as well as certain instructions associated with collateral movements.

Question 48 Help:

***Model 1 - Gross, Simultaneous Settlements of Securities and Funds Transfers.** These systems settle transfer instructions for both securities and funds simultaneously on a trade-by-trade (gross) basis, with final (irrevocable and unconditional) transfer of securities from the seller to the buyer (delivery) occurring at the same time as final transfer of funds from the buyer to the seller (payment). The securities settlement system maintains securities accounts and funds accounts for participants. Transfer of securities and cash are made by bookentry.*

***Model 2 - Gross Settlements of Securities Transfers Followed by Net Settlement of Funds Transfers.** These systems settle securities transfer instructions on a trade-for-trade (gross) basis, with final transfer of securities from the seller to the buyer (delivery) occurring throughout the processing cycle, but settle funds transfer instruction on a net basis, with final transfer of funds from the buyer to the seller (payment) occurring at the end of the processing cycle.*

The securities settlement system maintains securities accounts for participants, but funds accounts are usually held by another entity (often a commercial bank or the central bank). Securities are transferred by book-entry, such transfer being final at the instant the entries are made on the securities settlement system's books. The corresponding funds transfers are irrevocable, but not final. During the processing cycle, the system calculates running balances of funds debits and credits, the balance being settled at the end of the processing cycle when the net debit and net credit positions are posted on the books of the commercial bank or central bank that maintains the funds accounts. Settlement of funds accounts may occur once a day or several times a day.

***Model 3 - Simultaneous Net Settlement of Securities and Funds Transfers.** These systems settle transfer instructions for both securities and funds on a net basis, with final transfer of both occurring at the end of the processing cycle. Settlement may occur once a day or several times a day. The securities settlement system maintains securities accounts for participants. Funds accounts may be maintained by another entity, either a commercial bank or the central bank.*

During a processing cycle, running balances of debits and credits to funds and securities accounts are calculated. All funds and securities transfers are provisional until the end of the processing cycle, at which time book-entry transfer of securities take place. If and only if all participants have sufficient balances of funds and securities, final transfers of the net securities balances and net funds balances are executed.

49. Are the cash and security movements simultaneous?

- Yes
- No (please answer 49a)
- Not applicable
- Other (please answer 49c)

49c. If other, please explain:

Settlement instructions can be against payment or free of payment.

For against payment instructions, Euroclear Bank operates a Model 1 DVP system.

Transactions between Euroclear Bank clients are settled on a trade-by-trade basis, with simultaneous and final transfers of cash and securities in the books of Euroclear Bank.

Settlement over the Bridge with Clearstream Banking Luxembourg (CBL) also takes place according to Model 1 DVP, because there is simultaneous and final transfer of cash and securities between Euroclear Bank and CBL via the mutual cash and securities accounts that each holds with the other after each exchange. There are several exchanges each night and an Automated Daytime Bridge during the day.

External transactions (i.e. transactions that settle in a local market between a Euroclear Bank client and a local counterpart, which is typically a member of the local Securities

Settlement System (SSS)) follow the DVP rules (if any) of the local market. Local market regulations and operating practices determine settlement with external counterparties, finality, and whether or not settlement takes place on a DVP basis.

Entity Name

Transnational Euroclear Bank S.A. / N.V.

OWNERSHIP OF SECURITIES

The purpose of this section is to determine how ownership of securities is represented, the ways the depository maintains ownership or control of securities held in the depository, and the extent to which ownership of assets held by the depository is separated from the proprietary assets of the depository.

50. How are depository eligible securities held by the depository?

- Securities in the depository are held in dematerialized form.
- Securities in the depository are held in certificated form.
- Other (please answer 50a)

51. If depository eligible securities are certificated, can depository eligible securities be held outside of the depository?

- All eligible securities must be held in the depository. (please answer 51b)
- Securities may move freely into and out of the depository. (please answer 51h)
- Once entered into the depository, eligible securities must remain in the depository. (please answer 51b)
- Certain designated securities may be held outside the depository. (please answer 51a)
- Not applicable
- Other (please answer 51k)

51k. If other, please explain:

Euroclear Bank does not maintain its own vaults.

Physical securities deposited in the Euroclear System are held in the vaults of depositories/ -sub- appointed by Euroclear Bank or in the vaults of a Central Securities Depositories (CSD) where Euroclear Bank or its custodian maintains an account.

52. If securities are dematerialized:

May dematerialized security positions be re-certificated and held outside the depository?

- Yes (please answer 52a)
- No (please answer 52a)
- Not applicable
- Other (please answer 52j)

52d. If the securities held by the depository are recorded by book entry at the registrar, are the securities registered only to the depository, with the depository providing the function of recording ownership on a centralized basis for the market? (Choose all that apply.)

- Yes (please answer 52e)
- No (please answer 52g)
- Other (please answer 52l)

52g. If the securities held with the depository are recorded by book-entry at the registrar but are not registered exclusively to the depository, may they be registered to:

- The beneficial owner
- A nominee
- Other (please answer 52h)

52h. Please describe:

Registered securities and dematerialised securities deposited in the Euroclear System are recorded in the register in the name of either:

- one of our nominee companies.
- the Depository for the issue.
- in 'street name'; depending on the market, the 'street name' is the name of a broker or other institution holding the securities for its customer(s) or the name of a previous holder.
- another name as we consider appropriate.

52i. If the securities held with the depository are recorded by book-entry at the registrar, what are the control features at the registrar for transfer of registrar positions to and from the depository (e.g., authentication procedures, reconciliation, confirmation of position at registrar)? Please describe:

Each registrar and issuing company select the control features applicable to the actions of such registrar for the securities issued by such companies in accordance with applicable contractual provisions, local law and/or market practice.

Euroclear Bank does not review or monitor the control features of such a registrars.

52j. If other, please explain:

In some markets, it is possible to re-certificate dematerialised securities. In other markets, such as France, this is not possible.

Response Necessary/Eligibility Question**53. Rule 17f-7 requires that an Eligible Securities Depository “maintains records that identify the assets of each participant and segregate the system's own assets from the assets of participants.”****Does the depository maintain records that identify the assets of each participant and segregate the system's own assets from the assets of participants?**

- Yes
- No
- Not applicable (please answer 53a)
- Other (please answer 53a)

54. Does the law protect participant assets from claims and liabilities of the depository?

- Yes
- No
- Not applicable
- Other (please answer 54a)

54a. If other, please explain:

In accordance with Belgian law and Section 4 of the Terms and Conditions and Section 2.4 of the Operating Procedures, Euroclear Bank does not acquire any ownership interest in the securities deposited in the Euroclear System. Securities deposited in Euroclear Bank by clients are protected by Royal Decree No. 62 on the deposit of fungible financial instruments and the settlement of transactions, which gives Participants ownership rights in the pool of assets of the same issue of securities. In case of Euroclear Bank's insolvency, you retain your ownership rights in the pool of securities. Cash deposited with Euroclear Bank is not protected. Euroclear Bank becomes the legal owner of any cash deposited whilst clients retain a contractual right to the cash they deposit with us. It is worth noting that Euroclear Bank has been highly rated by Standard & Poor's and Fitch Ratings for the last ten years, reflecting the effectiveness of our risk controls and strong risk management. As a single-purpose bank, we have no financial issues.

55. Can the depository assess a lien on participant accounts? (A lien would entitle the depository to take and hold or sell the securities of the participant in payment of a debt.)

- Yes (please answer 55a)
- No
- Not applicable
- Other (please answer 55o)

55a. If yes, for what reasons are liens or similar claims imposed? (Choose all that apply.)

- Fees and expenses
- Collateralization of overdrafts
- To secure payment for purchased securities
- Other (please answer 55b)

55c. Please indicate the limits of this lien as indicated below: (Choose one.)

- The lien is limited to securities in the participant's proprietary account.
- The lien is limited to securities in the course of purchase and sale transactions, but does not extend to settled positions.
- The lien may extend to settled client positions. (please answer 55d)
- Other (please answer 55d)

55d. Please explain:

The statutory lien secures any claim we have against you arising in connection with the clearance or the settlement of transactions through, or in connection with, the Euroclear System, including claims resulting from loans or advances. You can find detailed information about the lien and pledge in favour of Euroclear Bank in section 3.5 of The Operating Procedures of the Euroclear System. As a rule, this lien only covers a client's proprietary assets, but it may extend to client assets under certain circumstances set forth in the law. If you have a legal requirement to do so, you may ask Euroclear Bank to issue a 'no lien' letter. By issuing this letter, Euroclear Bank waives its statutory lien over assets you hold on behalf of your underlying clients in specific Securities Clearance Accounts and/or Cash Accounts. You must separately and expressly identify these accounts in writing to Euroclear Bank. If you have agreed that the statutory lien applies to customer securities, the statutory lien on such securities only secures claims we have against you arising in connection with the clearance or the settlement of transactions through, or in connection with, the Euroclear System, carried out on behalf of your customers including claims resulting from loans or advances.

55e. If a lien is placed on a participant's account which has been designated for its clients, will the depository select certain securities to be subject to the lien?

- Yes (please answer 55f)
- No (please answer 55h)
- Other (please answer 55n)

55f. If yes, please indicate whether: (Choose one.)

- The lien is placed on the most liquid securities in the account
- The lien is placed on the securities with the greatest value in the account
- Other selection criteria is used (please answer 55g)

55g. Please explain:

Normally, an account designated as solely for customer securities is not subject to a lien.

However, if a Participant requests a credit line and asks to secure that credit line with assets held in such accounts (with the consent of its customer(s)), the lien granted by such participant to Euroclear Bank is a 'floating lien' and, thus, would extend only to securities with sufficient collateral value to cover the borrowings of the participant.

55i. If other, please describe:

55j. For accounts designated as client accounts, do procedures exist to restrict the placement of liens only to obligations arising from safe custody and administration of those accounts?

- Yes (please answer 55k)
- No
- Other (please answer 55m)

55l. Please explain:

55m. If other, please explain:

As noted earlier, normally an account designated as an account solely for customer assets is not subject to a lien, even for obligations arising from safe custody and administration.

However, if a participant requests a credit line and secures that credit line with assets held in such accounts (with the consent of its customer(s)), the lien granted would not be restricted to obligations arising from safe custody and administration. Such a lien would be restricted to securities with sufficient collateral value to cover the borrowings of the participant.

56. Transfer of Legal Ownership**Does the depository have legal authority to transfer title to securities?**

- Yes (please answer 56a)
- No
- Not applicable
- Other (please answer 56e)

56b. Please describe:**56e. If other, please explain:****HANDLING OF SECURITIES OUTSIDE THE DEPOSITORY ENVIRONMENT**

The purpose of this section is to consider the process (and any risk inherent within such a process) that involves the safekeeping of client assets while they are being removed from a depository and being lodged into a depository.

57. How are eligible securities lodged (that is, placed) in the depository system? (Choose all that apply.)

- A registered certificate in the name of the depository is delivered to the depository.
- A participant delivers the security with a valid transfer deed or stock power or other transfer document to the depository which then effects registration.
- A registrar re-registers the security in the name of the depository.
- Other (please answer 57a)
- Not applicable

57a. Please describe:

Eligible securities are lodged by credit of securities to our account with the CSD or sub-custodians. Registered securities deposited by clients in the Euroclear System are generally registered or held in sub-custody in a nominee name selected by Euroclear Bank or by the Sub-custodian (i.e. Depository). This is only done in markets where the use of a nominee is permitted.

58. When are securities lodged into the depository reflected in a participant's depository account? (Choose all that apply.)

- Securities are reflected in the participant depository account immediately upon delivery to the depository.
- Securities are re-registered prior to being reflected in the participant's depository account.
- Other (please answer 58a)
- Not applicable

58a. Please explain:

Should securities be confirmed to our account after the close of our real-time platform, these securities are credited into the participant's account at the next possible opportunity being our overnight batch processing.

59. How long does it usually take to lodge securities with the depository? (Choose one.)

- 1 to 2 days
- 3 days to 1 week
- 2 to 4 weeks
- More than 4 weeks (please answer 59a)
- Not applicable
- Other (please answer 59b)

59b. If other, please explain:

The time period required depends on the type and form of the security, the procedures of the relevant Euroclear depository accepting such securities, local law and local market practice in regards to transfers of ownership of securities. Accordingly, such transfers may be completed in a matter of hours or may require more than 4 weeks.

60. During the process of lodging securities into the depository, can the securities: Be traded?

- Yes
- No (please answer 60c)
- Not applicable
- Other (please answer 60c)

60a. During the process of lodging securities into the depository, can the securities: Be settled?

- Yes
- No (please answer 60d)
- Not applicable
- Other (please answer 60d)

60b. During the process of lodging securities into the depository, can the securities: Have ownership transferred?

- Yes
- No (please answer 60e)
- Not applicable
- Other (please answer 60e)

60d. If they cannot be settled, or if you answered other, please explain:

Trades of securities can only be settled by Euroclear Bank under the premise that the participant has received the securities in their Securities Clearance Account. Securities have to be available in the participant's account in order for settlement to take place.

[Except in certain markets explicitly noted in the Operating Procedures of the Euroclear System where a provisional credit of securities may be authorised].

61. Are securities immediately available for delivery upon transfer to the depository?

- Yes
- No (please answer 61a)
- Not applicable
- Other (please answer 61d)

61d. If other, please explain:

Should securities be confirmed to our account after the close of our real-time platform, they are credited into the participant's account at the next possible opportunity being our overnight batch processing.

62. Please describe briefly the arrangements/procedures/facilities you maintain to ensure that eligible securities held at the depository are handled at least as efficiently as compared to securities held outside the depository, particularly in relation to income, corporate actions and proxy services.

We provide efficient income, corporate actions and proxy services on securities held with us. We have a well-established process in place to proactively foresee and manage the collection of both information and proceeds on behalf of our clients.

We receive information from many sources including:

- data vendors
- the issue documentation (prospectus or indenture) which is often very extensive
- our depositories in the local market
- central securities depositories ("CSDs")
- stock exchanges (e.g. LSE, Euronext)
- the financial press
- issuers and their agents (due to our role as an international CSD)
- fiscal authorities.

Once information is received from our trusted sources, we apply a quality control by cross-checking the different information. The verified data is then stored on our corporate actions database and made available to you via a wide range of reporting channels.

63. What transfer process steps are involved when eligible securities are withdrawn from the depository for safekeeping? (Choose one.)

- Securities are re-registered into the name of the beneficial owner or a nominee.
- Securities are re-certificated and re-registered into the name of the beneficial owner or a nominee.
- Securities are re-certificated and delivered as bearer instruments.
- Securities are transferred as is any physical delivery in the market.
- Other (please answer 63a)
- Not applicable.

63a. Please specify:

All of the above and any other method can apply in accordance with applicable local law and market practice in the relevant jurisdiction.

64. How long does it usually take to remove securities from the depository? (Choose one.)

- 1 to 2 days
- 3 days to 1 week
- 2 to 4 weeks
- More than 4 weeks (please answer 64a)
- Not applicable
- Other (please answer 64b)

64b. If other, please explain:

We are capable of debiting securities in real time upon receipt of delivery instructions. The time period required for the beneficiary to receive these depends entirely on the type and form of the security, the procedures of the relevant Euroclear depository accepting such securities and local law and market practice as in regards to transfers of ownership of securities.

Accordingly, such transfers may be completed in a matter of hours or may require considerably more time, up to several weeks.

65. While the securities are being removed from the depository, can they:

65a. Be traded? (Choose one)

- No (please answer 65b)

- Not applicable
- Yes
- Other (please answer 65b)

65c. Be settled?

- No (please answer 65d)
- Not applicable
- Yes
- Other (please answer 65d)

65d. Please explain:

Once securities have been debited from a Participant's Securities Clearance Account, another delivery of such securities will not be able to settle in Euroclear Bank as these securities are no longer available.

65e. Have ownership transferred?

- No (please answer 65f)
- Not applicable
- Yes
- Other (please answer 65f)

STANDARD OF CARE

The purpose of this section is to understand the responsibility and liability that the depository has in providing services to its participants/members in the settlement and clearing of securities and/or cash, and to understand what type of protections exist for participants in the event of a participant failure/default.

Depository Liability

66. Does the depository accept liability (independent of any insurance coverage) for the following:

66a. Reconciliation errors with the registrar and/or the issuer that result in direct damages or losses to participants?

- No
- Not applicable
- Yes (please answer 66b)
- Other (please answer 66d)

66c. If other, please explain:

66e. Theft of securities (either physical certificate or electronically from accounts at the depository) from the depository that result in direct damages or losses to participants?

- No
- Yes (please answer 66f)
- Not applicable
- Other (please answer 66h)

66f. If yes, please check all of the following that apply:

- Financial limits are imposed on the amount of liability assumed by the depository
- The depository assumes liability for direct losses

The depository assumes liability for indirect or consequential losses

Other (please answer 66g)

66g. If other, please explain:

We are liable for direct losses incurred due to Euroclear Bank's negligence or wilful misconduct, and for indirect losses in case of gross negligence or wilful misconduct.

You can find an explanation of our duties and liabilities regarding our clients in Section 12 of the 'Terms and Conditions Governing Use of Euroclear' and in 'The Operating Procedures of the Euroclear System' attached.

66h. If other, please explain:

We are liable for direct losses incurred due to Euroclear Bank's negligence or wilful misconduct, and for indirect losses in case of gross negligence or wilful misconduct.

You can find an explanation of our duties and liabilities regarding our clients in Section 12 of the 'Terms and Conditions Governing Use of Euroclear' and in 'The Operating Procedures of the Euroclear System' attached.

66i. Failure of the depository's systems that result in direct damages or losses to participants because they cannot use either securities or funds?

No

Yes (please answer 66j)

Not applicable

Other (please answer 66l)

66j. If yes, please check all of the following that apply:

Financial limits are imposed on the amount of liability assumed by the depository

The depository assumes liability for direct losses

The depository assumes liability for indirect or consequential losses

Other (please answer 66k)

66k. If other, please explain:

We are liable for direct losses incurred due to Euroclear Bank's negligence or wilful misconduct, and for indirect losses in case of gross negligence or wilful misconduct.

You can find an explanation of our duties and liabilities regarding our clients in Section 12 of the 'Terms and Conditions Governing Use of Euroclear' and in 'The Operating Procedures of the Euroclear System' attached.

66l. If other, please explain:

We are liable for direct losses incurred due to Euroclear Bank's negligence or wilful misconduct, and for indirect losses in case of gross negligence or wilful misconduct.

You can find an explanation of our duties and liabilities regarding our clients in Section 12 of the 'Terms and Conditions Governing Use of Euroclear' and in 'The Operating Procedures of the Euroclear System' attached.

66m. Any direct damages or losses to participants caused by the depository due to its errors, omissions or fraud?

No

Yes (please answer 66n)

Not applicable

Other (please answer 66p)

66n. If yes, please check all of the following that apply:

Financial limits are imposed on the amount of liability assumed by the depository

The depository assumes liability for direct losses

The depository assumes liability for indirect or consequential losses

Other (please answer 66o)

66o. If other, please explain:

We are liable for direct losses incurred due to Euroclear Bank's negligence or wilful misconduct, and for indirect losses in case of gross negligence or wilful misconduct.

You can find an explanation of our duties and liabilities regarding our clients in Section 12 of the 'Terms and Conditions Governing Use of Euroclear' and in 'The Operating Procedures of the Euroclear System' attached.

66p. If other, please explain:

We are liable for direct losses incurred due to Euroclear Bank's negligence or wilful misconduct, and for indirect losses in case of gross negligence or wilful misconduct.

You can find an explanation of our duties and liabilities regarding our clients in Section 12 of the 'Terms and Conditions Governing Use of Euroclear' and in 'The Operating Procedures of the Euroclear System' attached.

66q. Any direct damages or losses to participants caused by the depository in its capacity as a central counterparty?

- No
- Not applicable
- Yes (please answer 66r)
- Other (please answer 66t)

66u. Does the depository guaranty settlement?

- No
- Yes (please answer 66v)
- Not applicable
- Other (please answer 66w)

66x. Any direct damages or losses to participants caused by the depository as a result of force majeure events, acts of God, or political events, etc.?

- No
- Yes (please answer 66y)
- Not applicable
- Other (please answer 66-1)

66-2. In all cases where the depository assumes responsibility for direct or indirect or consequential losses, is the depository's liability limited by a standard of care determination?

- No
- Yes (please answer 66*)
- Not applicable
- Other (please answer 66!)

66*. Please define the standard of care applied:

In accordance with Section 12 of the Terms and Conditions Governing Use of Euroclear, Euroclear Bank accepts liability for direct losses caused by its negligence and for direct, indirect or unforeseeable losses caused by its gross negligence or willful misconduct.

67. Do the depository's written contracts, rules, or established practices and procedures provide protection against risk of loss of participant assets by the depository in the form of?**67a. Indemnification**

- Yes (please answer 67b)
- No

Other (please answer 67b)

Not applicable

67b. Please explain (then please answer 67c):

We are liable for direct losses incurred due to Euroclear Bank's negligence or wilful misconduct, and for indirect losses in case of gross negligence or wilful misconduct.

You can find an explanation of our duties and liabilities regarding our clients in Section 12 of the 'Terms and Conditions Governing Use of Euroclear' and in 'The Operating Procedures of the Euroclear System' attached.

67c. Please provide details of the relevant sections of the contracts, rules or practices where this information is found.

You can find an explanation of our duties and liabilities regarding our clients in Section 12 of the 'Terms and Conditions Governing Use of Euroclear' and in 'The Operating Procedures of the Euroclear System' attached.

67d. Insurance

Yes (please answer 67e)

No

Other (please answer 67e)

Not applicable

67e. Please explain (then please answer 67f):

As set forth in Section 2.11 of the Operating Procedures, Euroclear Bank maintains insurance policies with respect to securities held in the Euroclear System. The main insurance policies we maintain include the following:

- Crime and civil liability insurance
- Premises and transit coverage for securities held in the Euroclear System

Euroclear Bank requires depositories / sub-custodians to maintain insurance coverage for securities held on behalf of Euroclear Bank.

67f. Please provide details of the relevant sections of the contracts, rules or practices where this information is found.

Please refer to the following documents attached and available via the Euroclear Bank Due Diligence Pack:

- Insurance Programme
- Operating Procedures of the Euroclear System
- Statement in Favour of SEC Regulated Participants

67g. Acknowledgement of liability for losses caused by depository's own actions.

Yes (please answer 67h)

No

Other (please answer 67h)

Not applicable

67h. Please explain (then please answer 67i):

We are liable for direct losses incurred due to Euroclear Bank's negligence or wilful misconduct, and for indirect losses in case of gross negligence or wilful misconduct.

You can find an explanation of our duties and liabilities regarding our clients in Section 12 of the 'Terms and Conditions Governing Use of Euroclear' and in 'The Operating Procedures of the Euroclear System' attached.

67i. Please provide details of the relevant sections of the contracts, rules or practices where this information is found.

Please refer to Section 12 of the 'Terms and Conditions Governing the Use of Euroclear', attached.

67j. Other

Yes (please answer 67k)

No

68. Is the depository immune from legal action in its own jurisdiction?

Yes

No

Other (please answer 68a)

Security Control

69. How do participants receive information (view actual settlement of trades, movement of securities on their accounts, etc.) and see the status of their accounts? (Choose all that apply.)

By direct electronic link

By receipt of physical account holding statements

Other (please answer 69a)

Not applicable

69a. Please explain:

SWIFT

Entity Name

Transnational Euroclear Bank S.A. / N.V.

70. Do participants have access to affect their holdings, including confirming and affirming trades, movement of securities on their accounts, etc.?

- Yes (please answer 70a)
- No
- Other (please answer 70d)
- Not applicable

70a. How is access given to participants? (Choose all that apply.)

- By direct electronic link (please answer 70b)
- Other (please answer 70c)

70b. Please select type of electronic link:

- Dial-up modem
- Secured, leased, dedicated telephone line
- Internet
- Fax

70c. Please explain:

Via EasyWay, EUCLID and SWIFT via Public internet, SWIFT network and/or BT Radianz.

71. Regarding data security:

71a. Are passwords used by participants to access their accounts?

- Yes
- No
- Not applicable
- Other (please answer 71b)

71c. Does each user have a unique user ID?

- Yes
- No
- Not applicable
- Other (please answer 71d)

71e. Are passwords regularly changed?

- Yes (please answer 71f)
- No
- Not applicable
- Other (please answer 71g)

71h. Is there a user lock-out after a pre-set number of unsuccessful User ID attempts?

- Yes (please answer 71i)
- No
- Not applicable

Other (please answer 71j)

71i. How many? This may vary per application, however it is typically after three attempts.

72. Does the depository communicate with other market entities such as stock exchanges, payment systems, clearing houses, etc., by secured linkages?

Yes (please answer 72a)

No (please proceed to 74)

Not applicable (please proceed to 74)

Other (please answer 72a)

72a. Please explain:

Euroclear Bank communicates with other market entities via SWIFT and electronic links.

73. How does the depository communicate with other market entities?

73a. Stock Exchanges (Choose all that apply.)

Dial-up modem

Secured, leased, dedicated telephone line

Internet

Fax

Paper/other

Not applicable

73b. Payment Systems (Choose all that apply.)

Dial-up modem

Secured, leased, dedicated telephone line

Internet

Fax

Paper/other

Not applicable

73c. Clearing Houses (Choose all that apply.)

Dial-up modem

Secured, leased, dedicated telephone line

Internet

Fax

Paper/other

Not applicable

73d. Registrars (Choose all that apply.)

Dial-up modem

Secured, leased, dedicated telephone line

Internet

Fax

Paper/other

Not applicable

74. How is access to the physical building controlled? (Choose all that apply.)

- By guards
- By electronic keys/personal ID card
- By alarm system
- Other (please answer 74a)

74a. Please explain:

Access cards are accompanied by personal PIN code to access buildings and floors. Our system is also equipped with anti pass-back controls.

Prior notification is required for all visitors to our sites, who are escorted throughout their visit. Security cameras monitor access to the building as well as other critical areas. Any significant security incidents are formally reported to management.

75. What are the vault security procedures for the safekeeping of physical paper? (Choose all that apply.)

- Not applicable no vault is maintained
- Electronic keys/combinations
- Dual access control
- Visitor logs
- Vault counts (please answer 75a)
- Intrusion alarms
- Fire alarms
- Guards
- Other (please answer 75b)

75b. Please explain:

Euroclear Bank does not maintain its own vaults. Physical securities deposited in the Euroclear System are held in the vaults of sub-custodians (custodian banks, referred to as Depositories) appointed by Euroclear Bank or in the vaults of a Central Securities Depositories (CSD) where Euroclear Bank or its custodian maintains an account. Our sub-custodians are contractually required to clearly segregate and label the physical securities as being held on behalf of Euroclear Bank. The security procedures are per the local market standard and practise. For Depositories holding physical securities, regular due diligence reviews include a visit to the vaults, where Euroclear Bank carries out:

- a check of the security and control procedures in and outside the vaults.
- a spot check for a certain number of securities to check the physical integrity of the securities, if the coupons are attached, the serial numbers of the securities and that the holdings in the vaults correspond to our records.

Participant Default Protections Resulting from a Participant Failure

76. If a participant defaults, how is the loss covered? (Choose all that apply?)

- Depository insurance covers the loss (please answer 76a)
- The depository guaranty fund covers the loss
- Loss is shared among participants (please answer 76b)
- Other (please answer 76d)
- Not applicable

76d. Please explain:

Section 3.8 of the Operating Procedures of the Euroclear System, states that, upon your default, we have the right to retain cash or securities up to an amount which we in our reasonable opinion believe, based on the portfolio composition and history of occurrence of default of the issuer of such securities, will cover any amount due or that may become due to us by you.

Furthermore, if your counterparty defaults, your assets are protected as no securities will be delivered unless the payment from the counterparty is in place, and vice versa. There is a simultaneous exchange of securities and cash.

77. During the past three years, has there been a situation where a participant defaulted which resulted in a significant loss?

- Yes (please answer 77a)
- No
- Not applicable
- Other (please answer 77a)

78. Does the depository have a guaranty fund independent of stock exchange or other market guarantees?

- Yes (please answer 78a)
- No (please proceed to 79)
- Not applicable (please proceed to 79)
- Other (please answer 78l)

78d. How is the fund financed? (Choose one.)

- Contributions from owner (please answer 78e)
- Contributions from participants (please answer 78f)
- Funding from retained earnings
- Other (please answer 78g)

78h. Who is covered by the fund? (Choose all that apply.)

- Direct depository participants only
- The beneficial owner also
- Other (please answer 78i)

78j. When is the guaranty fund used? (Choose all that apply.)

- When a broker defaults
- When a direct participant defaults
- Other (please answer 78k)

79. Does the depository have forms of oversight management for assessing and monitoring of the following? (Choose all that apply.)

- Participant eligibility requirements
- Participant volumes
- Participant financial strength
- Other loss or default protections the depository maintains (please answer 79a)
- Collateral requirements for participants (please answer 79b)
- Debit caps for participants (please answer 79c)
- Settlement controls that minimize or eliminate the risk of default by a participant (please answer 79d)
- Blocking of securities movement before receipt of payment
- Blocking payment until securities are moved
- Other forms of risk management used for assessing and monitoring participant exposures (please answer 79i)
- Not applicable

79b. Please explain the requirements:

We offer credit facilities on a secured and uncommitted basis, to ease your settlement and custody activity. Any borrowings are therefore of a short-term nature, mostly intra-day. As credit is provided on a secured basis, clients must provide collateral in order to be in debit (daylight and overnight). Please note that having a credit line is not a requirement to use the Euroclear System.

79c. Please explain how these debit caps work:

If a client exceeds their overdraft limit (or if the collateral is insufficient to support the credit line), their settlement or cash instruction will be blocked. If this happens, clients can contact our Credit Monitoring team who will help them dealing with operational credit problems or queries.

79d. What type or types of settlement controls (Choose all that apply.)

- Blocking or freezing of securities positions (please answer 79e)
- Controlling DVP settlement (please answer 79f)
- Simultaneous DVP (please answer 79g)
- Other (please answer 79h)

79e. Please explain:

If the securities are subject to a 'floating lien', used as collateral to secure a client's credit line, we will prevent the securities from leaving the client's Securities Clearance Account.

79f. Please explain:

For against payment instructions, Euroclear Bank operates a Model 1 DVP system. Through this we ensure that principal risk is eliminated through simultaneous transfers of cash and securities. Through the positioning stage of the settlement lifecycle, our systems verify the availability of the cash/or credit line and securities provisions before executing instructions.

Transactions between Euroclear Bank clients are settled on a trade-by-trade basis, with simultaneous and final transfers of cash and securities in the books of Euroclear Bank.

Settlement over the Bridge with Clearstream Banking Luxembourg (CBL) also takes place according to Model 1 DVP, because there is simultaneous and final transfer of cash and securities between Euroclear Bank and CBL via the mutual cash and securities accounts that each holds with the other after each exchange. There are several exchanges each night and an Automated Daytime Bridge during the day.

External transactions (i.e. transactions that settle in a local market between a Euroclear Bank client and a local counterpart, which is typically a member of the local Securities Settlement System (SSS)) follow the DVP rules (if any) of the local market. Local market regulations and operating practices determine settlement with external counterparties, finality, and whether or not settlement takes place on a DVP basis.

79g. Please explain:

Please refer to the response to 79f above.

79i. Please explain briefly how these work:

We monitor the client during our relationship with them to ensure they continue to fulfil the criteria used for admission.

An automated tool is used for appropriate scrutiny and monitoring of transactions, account activity and customers in order to identify unusual and potentially suspicious activity.

80. Does the stock exchange have default protections that extend to the depository, such as the following? (Choose all that apply.)

- Margin requirements for stock exchange members
- Guaranty fund for stock exchange members
- Financial requirements for stock exchange membership
- Other (please answer 80a)
- No
- Not applicable

BUSINESS RECOVERY PLAN

This section is intended to identify key aspects of the depository's Business Recovery Plan (BRP), including testing requirements and past results, expected recovery time periods, and the independent review and validation (if any) of the BRP.

81. Do you have a formal business recovery plan?

Yes (please answer 81a)

No

Other (please 81g)

81a. Does your Business Recovery Plan include: (Choose all that apply.)

Back-up of all computer files

Off-site data storage

Back-up files stored and locked

Off-site operations facility

Other (please answer 81h)

81b. Please identify both the frequency and the last date of testing for the following third party:

Depository participants/members

Tests are carried out regularly to make sure that the Euroclear Bank continuity infrastructure performs in an emergency situation.

Euroclear maintains a yearly calendar of multiple tests. These are complementary in as far as they tackle different components of the recovery strategy. Every component is tested at least once a year. Test reports are produced. Completion of any action plan resulting from the tests is closely monitored.

The tests include:

· IT Disaster Recovery testing. Four times per year, Production is switched between DC1 and DC2 to guarantee that the Production can be switched transparently between the sites, should an incident require us to do so. The latest production swap between DC1 and DC2 took place in January 2020. The activation of DC3 is tested once a year. This was successfully tested in November 2019. Other disaster scenarios are tested technically by the IT teams.

· Office switch test. During an office switch test we simulate the loss of an office and the ability of the other offices to maintain business operations and deliver services in a 'business as usual mode'. Loss of an office could be for multiple reasons: evacuation, office not physically reachable (e.g. blocked by a strike), office cannot be used (e.g. power cut, air conditioning not working, etc). Exercises simulating the loss of an office site are conducted at least once a year with critical business operations and IT support teams. The last office switch test took place in October 2019.

· Crisis Management rehearsal exercises. We train the crisis managers and test the crisis management procedures via desktop or simulation exercises. Several of these exercises are organised each year, as standalone activities or combined with the other activities. The latest exercises took place in June 2019.

· External crisis management testing.

As the activation of our BC plans is transparent to our clients, we mainly carry out the testing of specific plans with other critical infrastructures such as the national banks, SWIFT etc.

Euroclear Bank also participates regularly in Business Recovery Plans testing with other major market infrastructures such as Banque Nationale de Belgique, Bank of England, Banque de France, Netherlands National Bank and SWIFT as detailed below. The objective of our shared exercises is to build awareness and knowledge relating to potential scenarios.

Recent tests include:

o Market Wide exercises (MWE) in the UK are coordinated by the Bank of England and take place every two years. Euroclear always participates in those exercises. The most recent exercise, SIMEX 18, took place on 09 November 2018.

o Under the governance of the UK Cross-Market Operational Resilience Group (CMORG), the UK sector is encouraged to take part in other exercises in those alternate years where there is no MWE. These exercises are coordinated by the Sector Exercise Group, a sub group of CMORG. Euroclear participated in Exercise Comet Laps, a sector wide Cyber Incident Response Exercise which took place on 24/25 October 2019.

o Netherlands National Bank (every two years): the test took place on 21 November 2018.

o National Bank of Belgium: Market exercise took place on 8 November 2018 (NBB did not perform the exercise in 2019).

o G7 Cross Border exercise (4 to 6 June 2019): under Banque de France leadership, objective of that exercise was to test the French market players collective and individual responses and to coordinate capability facing a cyber crisis affecting the financial market.

· Walk-through events. Walk-through training is provided annually for all staff to familiarise them with their specific departmental plans and to validate those plans. These are organised as part of the annual Business Impact Analysis review.

· Evacuation exercises. Annual evacuation exercises are conducted at each of the sites; where possible, these are linked to a crisis scenario. The last exercise took place in November 2019 for our offices in Belgium and Hong Kong, and July 2019 for our office in Poland.

· Telephone call-out plan. A mass notification tool is in place to ensure that all employees can be notified of an incident. The tool reaches staff using a combination of SMSs and email messages. It was last tested in June 2019. In addition to that, critical departments maintain call out plans.

· Remote access working is regularly tested and activated in the event of widespread public transportation strikes (e.g. May, June, July 2018) or in exceptional circumstances. Teleworking was activated:

o November 2015: in response to the Belgian authorities decision to raise the terrorism threat for the Brussels region to level 4, the maximum level

o March 2016: following terrorist attacks in Brussels

o May 2019: flood in Krakow

o June 2019 to January 2020: protests in Hong-Kong

The activation of Business Continuity plans has been decided by the crisis management team to ensure the safety and security of our staff in respective locations. These plans are robust and, as such, thanks to a variety of measures, including teleworking and using the resources we have in other locations in the group, there was no interruption to services that we provide to our clients.

81c. Please identify both the frequency and the last date of testing for the following third party:

Stock exchange

We perform regular testing with the stock exchanges. The testing dates vary with the different stock exchanges, but we can confirm that they are tested at least every 12 months and that all scheduled tests were duly carried out.

81d. Please identify both the frequency and the last date of testing for the following third party:

Central bank

As the activation of our BC plans is transparent to our clients, we mainly carry out the testing of specific plans with other critical infrastructures such as the national banks, SWIFT etc.

Euroclear Bank also participates regularly in Business Recovery Plans testing with other major market infrastructures such as Banque Nationale de Belgique, Bank of England, Banque de France, Netherlands National Bank and SWIFT as detailed below. The objective of our shared exercises is to build awareness and knowledge relating to potential scenarios.

Recent tests include:

o Market Wide exercises (MWE) in the UK are coordinated by the Bank of England and take place every two years. Euroclear always participates in those exercises. The most recent exercise, SIMEX 18, took place on 09 November 2018.

o Under the governance of the UK Cross-Market Operational Resilience Group (CMORG), the UK sector is encouraged to take part in other exercises in those alternate years where there is no MWE. These exercises are coordinated by the Sector Exercise Group, a sub group of CMORG. Euroclear participated in Exercise Comet Laps, a sector wide Cyber Incident Response Exercise which took place on 24/25 October 2019.

o Netherlands National Bank (every two years): the test took place on 21 November 2018.

o National Bank of Belgium: Market exercise took place on 8 November 2018 (NBB did not perform the exercise in 2019).

o G7 Cross Border exercise (4 to 6 June 2019): under Banque de France leadership, objective of that exercise was to test the French market players collective and individual responses and to coordinate capability facing a cyber crisis affecting the financial market.

81e. Please identify both the frequency and the last date of testing for the following third party:

Local brokers

Local brokers in relationship with us are typically our clients. The design of our IT disaster recovery and our business recovery plans makes the activation of recovery plans transparent for our clients and other third parties.

Therefore, we do not encumber our clients with our business continuity testing. We only carry out Business Continuity Plans (BCP) testing with critical infrastructures such as the national banks, SWIFT etc.

81f. Please identify both the frequency and the last date of testing for the following third party:

Any other third party

We perform testing on agreed arrangements with external parties, such as:

- Crisis communication modes at least twice a year (unless they have been activated in real life situation),
- Reciprocal plans with other FMI's (eg: NCBs, other (I)CSDs, CCPs...), and we participation to Market exercises where and when they are organised

81h. If other, please explain:

Three data centres

Euroclear operates two main 'hot standby' data centres, DC1 and DC2, located at sufficient distance from each other to mitigate the risk that a single event halts operations. Sites are linked by real-time synchronous data mirroring and load balanced networks. The effectiveness of the data centres' operational and recovery procedures is ensured through the transfer of production activity between sites at least four times a year.

Should both DC1 and DC2 become inoperative, a third data centre (DC3) - warm standby - based 300km away from DC1 and DC2 and not close to a nuclear plant, can take over full production volume in the event of a regional disaster affecting both other data centres. This site is asynchronous and enables the resumption of business critical services within the same business day if a major incident affects the other two sites. The regional recovery capability is tested annually.

Multiple offices Euroclear operates a multiple office strategy whereby critical teams are located across at least two distant locations, and operations are conducted from different sites simultaneously.

This set-up is operated on a continuous basis, thus ensuring sustained client services and operations following a major metropolitan-wide event.

Our operations sites are in:

- Brussels
- Krakow, Poland
- Hong Kong

Operating from the different sites simultaneously increases the resilience to local and regional incidents and the flexibility of our response. There can be immediate continuity from one or several of the active sites if one of the offices is out of action.

Remote system access

Remote access fits within our risk and contingency approach to address staff unavailability. It is used in particular:

- in the event of a disruption to transport, extreme weather conditions or an issue affecting both Belgian offices, critical staff can connect from home via a laptop; and
- in critical processes, activities and staff are identified in detailed Business Impact Analyses (BIA) that form part of the departmental business continuity plans.

Teleworking is available to Euroclear employees, and clear eligibility criteria and security policies have been established. The Euroclear computer networks may be accessed remotely by authorised users through the authorised Euroclear remote access route (secure connection, for example strong authentication, VPN, Digipass etc.).

82. How quickly can the main system be reactivated in the event of an outage? (Choose one.)

- 1 - 4 hours
- 4 - 8 hours
- 8 - 24 hours
- Longer than 24 hours
- Not applicable
- Other (please answer 82a)

83. If a back-up system exists, how quickly can the back-up system be activated in the event of the main system failing? (Choose one.)

- 1 - 4 hours
- 4 - 8 hours
- 8 - 24 hours
- Longer than 24 hours
- Not applicable
- Other (please answer 83a)

84. Will the depository publicly announce any system interruption?

- Yes (please answer 84a)

- No (please proceed to 85)
- Not applicable
- Other (please answer 84g)

84a. To whom will the depository disclose any system interruptions? (Choose all that apply.)

- To the depository regulators
- To all direct participants
- To direct and indirect participants
- To the public via the internet (please answer 84b)
- In the press (please answer 84c)
- Other (please answer 84d)

84e. How will the depository disclose any system interruptions? (Choose all that apply.)

- By e-mail
- By telephone
- Public announcement
- Press release
- Other (please answer 84f)

84f. Please explain:

In case of incidents impacting your business with us, we will inform you as soon as feasible. The timing depends on the severity of the incident. For critical incidents we aim to inform you within two hours of the occurrence.

There are two methods to advise you of significant incidents or disruptions to our normal services:

· We advise clients of significant incidents impacting services or normal connectivity channels via automatic email alerts.

Register via the News & Updates app on MyEuroclear (my.euroclear.com). Select the service or connectivity channel you are interested in, subscribe and ensure to tick 'I want to receive time-critical email notifications'. Emails are sent from euroclear@news.euroclear.com so we recommend you ensure this address is whitelisted and as such not blocked by spam filters.

We regularly test our mass notification tool.

· We have launched a new ongoing incidents webpage to provide you with the latest information during operational incidents. The new webpage will complement our time-critical notifications with more details about the operational incident. Kindly note that the webpage will only be accessible during operational incidents for registered users of the Euroclear Bank website.

Your regular relationship management team (Account and Sales & Relationship Manager) may also contact you proactively.

85. In the past three years, has it been necessary to activate the recovery plan in a live situation?

- Yes (please answer 85a)
- No
- Not applicable
- Other (please answer 85e)

85b. How much time was needed to recover and restore business to normal operations? (Choose one.)

- 1 - 4 hours (please answer 85c)
- 4 - 8 hours (please answer 85c)
- 8 - 24 hours (please answer 85c)
- Longer than 24 hours (please answer 85c)

85e. If other, please explain:

In the past three years, we did not suffer any major IT outage requiring the activation of our IT failover procedures. However, we experienced a number of minor and partial systems'

outage which were covered by our standard Business Continuity Planning.

For details, please refer to our 2020 Summary Business Continuity Planning provided in annex.

PERFORMANCE, INSURANCE, AND LOSS

This section is intended to identify the level of insurance maintained by the depository, and the extent to which coverage would extend to financial loss incurred by participants and their clients, including but not limited to losses resulting from operating performance, security breaches, and employee negligence or misconduct.

86. Has there been any material loss by the depository during the past three years?

- Yes (please answer 86a)
- No
- Other (please answer 86b)
- Not applicable

87. Has the depository been subject to any litigation involving a participant during the past three years?

- Yes (please answer 87a)
- No
- Other (please answer 87b)
- Not applicable

87b. If other, please explain:

Euroclear's provisions for litigations are published in our financial statements (Section XIX "Provisions for liabilities and charges"), made publicly available in our annual reports at <https://www.euroclear.com/en/about/Our-business/annual-report.html>. This includes information on any instances of litigations and the subsequent payouts made. For more information, please see our annual reports by visiting the above mentioned website.

88. Has the depository realized revenues sufficient to cover expenses during the past three years? (Choose one.)

- Yes for all three years
- Yes for two of the last three years
- Yes for one of the last three years
- None of the last three years
- Not applicable
- Other (please answer 88a)

89. Does the depository maintain a reserve for operating losses?

- Yes (please answer 89a)
- No
- Not applicable
- Other (please answer 89b)

89b. If other, please explain:

As part of the capital requirements imposed on Euroclear Bank by the National Bank of Belgium (NBB), we put aside around EUR 300 million in capital to protect against operational losses. The NBB imposes stringent capital requirement on us. Euroclear's Tier 1 capital adequacy ratio is approximately 39%, which enables the bank to meet NBB's capital requirement comfortably.

When Euroclear Bank considers that a risk of loss is more likely than not, Euroclear Bank does provision the occurred incidents.

90. Has the regulatory body with oversight responsibility for the depository issued public notice that the depository is not in current compliance with any capital, solvency, insurance or similar financial strength requirements imposed by such regulatory body?

- Yes (please answer 90a)

- No
- Not applicable
- Other (please answer 90f)

90b. In the case of such a notice having been issued, has such notice been withdrawn, or, has the remedy of such noncompliance been publicly announced by the depository?

- Yes (please answer 90c)
- No (please answer 90d)
- Other (please answer 90e)

91. Does the depository have insurance to cover losses in the event of Default on settlement commitments by the depository or a participant?

- Yes (please answer 91a)
- No
- Not applicable
- Other (please answer 91c)

91b. What is the amount of the deductible?

92. Does the depository have Fidelity insurance (that is, insurance to cover loss of securities or money resulting, for example, from acts such as forgery, theft, fraud and/or employee dishonesty)?

- Yes (please answer 92a)
- No
- Not applicable
- Other (please answer 92c)

92a. What is the amount of the coverage?

Our crime and civil liability insurance covers fidelity, fraud, errors and omissions, and computer manipulation for an amount of EUR 265 million plus a reinstatement of respectively EUR 245 million.

92b. What is the amount of the deductible?

This information is not made publicly available.

93. Does the depository have insurance for Operational Errors?

- Yes (please answer 93a)
- No
- Not applicable
- Other (please answer 93c)

93a. What is the amount of the coverage?

Our crime and civil liability insurance covers fidelity, fraud, errors and omissions, and computer manipulation for an amount of EUR 265 million plus a reinstatement of respectively EUR

245 million.

93b. What is the amount of the deductible?

This information is not made publicly available.

94. Does the depository have Errors and Omissions insurance?

- Yes (please answer 94a)
- No
- Not applicable
- Other (please answer 94c)

94a. What is the amount of the coverage?

Our crime and civil liability insurance covers fidelity, fraud, errors and omissions, and computer manipulation for an amount of EUR 265 million plus a reinstatement of respectively EUR 245 million.

94b. What is the amount of the deductible?

This information is not made publicly available.

95. Does the depository have insurance for the Premises?

- Yes (please answer 95a)
- No
- Not applicable
- Other (please answer 95c)

95a. What is the amount of the coverage?

This information is not made publicly available but the premises are insured to full value.

95b. What is the amount of the deductible?

This information is not made publicly available.

96. Does the depository have any other insurance?

- Yes (please answer 96a)
- No
- Not applicable
- Other (please answer 96d)

96a. If so, what is it for?

For: general liabilities, property damages, cyber risks, directors and officers, employment practices liabilities, transit and location liabilities including Registered Mail + non business related insurances (e.g. travel coverage)

96b. What is the amount of the coverage?

This information is not made publicly available.

96c. What is the amount of the deductible?

This information is not made publicly available.

97. Who is the insurance carrier? If more than one insurance carrier, please list each carrier here and provide your responses to questions 97a and 97b in corresponding order.

We have several insurers; for the list of main insurers for our two key insurance policies, please refer to the insurance certificates provided in annex.

For our insurers and we require that:

- they have a Standard and Poor's insurer credit rating of minimum A- (or equivalent)
- they are not related to the Euroclear group

97a. Who is the insurance carrier's parent company, if applicable? (If inapplicable, simply type n/a.)

We do not maintain a public record of our insurers' parent company. For the list of main insurers for our key insurance policies, please refer to the insurance certificates provided in annex.

97b. What is the term of the policy?

Please refer to the Insurance Programme in annex for further information.

97c. Who does the insurance cover? (Choose all that apply.)

- Depository
- Direct depository participants
- Final investors
- Other (please answer 97d)
- Not applicable

97d. If other, please identify:

The insurances cover Euroclear PLC and all its subsidiaries, including Euroclear Bank SA/NV.

98. If you feel that you would like to provide additional details on any of the given answers, feel free to provide any additional comments here (maximum of 5,000 characters) or prepare an additional document identifying the question(s) you are commenting on

and upload the document under 98a:

We maintain comprehensive insurance coverage, and our main insurance policies are:

- Crime and civil liability insurance
- Premises and transit coverage for securities held in the Euroclear System

For further information on our insurance programmes, please refer to the following documents :

- Insurance Programme
- Insurance Certificate - Crime and Civil Liability
- Insurance Certificate - Transit and Location

For any other supporting documents referred to in our answers given, please see them attached in our response to question 98a below.

98a. Upload document here:

- [Cash and Credit reporting card.pdf](#)
- [Euroclear - Insurance Summary 2020.pdf](#)
- [Euroclear Annual review 2019.pdf](#)
- [Euroclear Bank Financial Statements 2019.pdf](#)
- [Euroclear Summary of Business Continuity Planning 2020.pdf](#)
- [Insurance Certificate Crime and Civil Liability - 2020.pdf](#)
- [Insurance Certificate Transit and Location - 2020.pdf](#)
- [Operating Procedures of the Euroclear system.pdf](#)
- [Quick cash card.pdf](#)
- [Settlement Reporting Quick Card.pdf](#)
- [Statement in Favour of SEC Regulated Participants.pdf](#)
- [Terms and Conditions Governing Use of Euroclear.pdf](#)

PUBLIC AVAILABILITY**99. The AGC encourages respondents/depositories to make their answers to this questionnaire publicly available. Will you be making your response publicly available? (For additional guidance, please review the help feature to this question.)**

- Yes (please answer 99a)
- No

99a. If yes, how will you be making it publicly available: (Choose all that apply.)

- Web site (please answer 99b)
- By individual request with depository (please answer 99c)
- Other (please answer 99i)

99b. Please provide web site address of publicly available questionnaire:

<https://www.euroclear.com/en/about/Our-business/disclosures-and-questionnaire-responses.html>

99d. How would they prefer to be contacted? (Choose all that apply.)

- Telephone (please answer 99e)
- Facsimile (please answer 99f)
- By mail/air courier (please answer 99g)
- By e-mail (please answer 99h)

100. Association members from time to time receive requests from their direct investor-clients for an informational copy of a depository's completed questionnaire. Such requests typically lead to interactions between personnel at the depository in question and member personnel or client personnel, or both. Those interactions take time and impose costs on both members and depositories.

Do you approve of Association members delivering a copy of your completed questionnaire to the member's direct client in response to the client's request?

Yes

No

CYBER SECURITY

101. Does your organization have a documented cybersecurity policy in place? If so, please provide a copy or overview.

Yes

No

Comments:

Yes, Euroclear Bank has an extensive set of policies and procedures in place.

These are maintained up to date, reviewed and recertified yearly.

As per our internal policies and security reasons, these documents are confidential and cannot be shared externally.

102. Please confirm that your staff receive relevant training about this policy:

Yes

No

Yes, security awareness is a priority for Euroclear.

Our staff members receive relevant trainings in regards to cyber security on a continuous and ad hoc basis if necessary.

Some of those trainings are mandatory (on-line training on security awareness, phishing, data leakage, ...) and a test must be successfully passed at the end of each presentation. A tracking and reporting is performed on the "attendance" of those on-line tests. KPI are set, measured and reported to the management. The success ratio of the test is also subject to KPI, monitoring and reporting.

Other initiatives like for example Phishing exercises, are also organised on a continuous basis. Results are tracked and reported to IT senior management.

103. Please provide an overview of your policy for continuity of business in the event of a large data breach or cyber attack against your organization.

In the past few years, we have been developing response plans to different cyber incidents and identified plausible scenario's, including data breaches. In particular, Euroclear has developed the Cyber

Security Operational Management Framework in order to structurally manage the cyber threats the company faces. The framework consists of a Cyber Threat Model covering the applicable cyber threats and the Cyber Security Capability Model covering the capabilities that are required to counter the cyber threats.

We have regularly practiced crisis management and crisis communication plans which would be activated to deal with a cyber incident. We have reviewed our crisis communication plans and confirmed that they are appropriate to cover cyber scenarios as well. More specifically, in the case of a data breach, we would not expect an impact on the provision of our services, therefore our crisis teams would focus on managing the impact on the company's reputation and informing relevant parties. As per our internal policies and for security reasons, these documents are confidential and cannot be shared externally. Our business continuity plan is however further described in the Euroclear Bank Standard Due Diligence Document available in the Due Diligence Pack.

104. In the last 12 months have there been any changes to the policy? If yes, please detail.

Yes

No

Comments:

As the cyber security environment is constantly evolving, Euroclear's policies are adapted accordingly. In addition, it is foreseen in the document lifecycle, to be reviewed and approved at least annually.

More specifically, there have been enhancements to the response plans in the past few years. The threat posed by cyber-crime is constantly evolving and like every financial institution we have to continue to keep pace and stay resilient.

105. Please advise how often you review the policy.

Semi-Annually

Annually

Other

Comments:

The document lifecycle foresees an annual review and approval. However, when required, this is done more frequently, to adapt to the the evolving cyber security environment.

106. Please provide (as an attachment) a diagram showing where your cybersecurity function resides and who it reports to.

[Security and Resilience.pdf](#)

Comments:

Cybersecurity function resides in the Group Security and Business Resilience division – the division is dedicated and cross-cutting to cover all security matters. This division is headed by the Chief Information Security Officer (CISO) who reports to both the Group Chief Information Officer (CIO) as well as the Group Chief Risk Officer (CRO).

107. How does your organization identify which business functions carry a cyber risk?

Euroclear Banks operates within a highly regulated market infrastructure regime and is a systemically important financial institution. Euroclear Bank is committed to maintain its strong reputation in the financial industry for its safety and resilience, and for the quality of its products and post-trade services. In this context, a comprehensive and effective risk governance framework, underpinned by a sound risk culture, is critical to the overall effectiveness of Euroclear's risk management arrangements. Euroclear has a least privileged access principle, which is stipulated in our internal policies. The identification of business roles and the corresponding segregation of duties, lies in the basis of this policy. Acces rights are provided through Business Roles that are built upon the least privilege access. Segregation of duties is enforced within these Business Roles. Other mitigating controls are put in place where needed, such as 4 eyes principle (also embedded in the business roles).

Quarterly a review of the access is required from each team manager.

108. Do you conduct ongoing testing and monitoring processes to ensure that all internal and external connectivity and system configurations are not at risk of cybersecurity breaches? If yes, please provide details and indicate frequency.

Yes

No

Comments / frequency:

The Cyber Intelligence & Resilience Team (CIRT), a function within Group Security and Business Resilience division (GSBR), coordinates the measures to counter cyber threats to the organisation. The main components of the CIRT function are:

- Security analytics
- Security information and event monitoring and analysis
- Network and system activity profiling
- Threat management through cyber threat intelligence gathering and dissemination
- Security incident management, comprising:
 - o Forensic investigations and analyses.
 - o Intake, assessment, tracking, response, follow-up, measurements and reporting.
 - o Penetration testing, including co-ordination, reporting and follow-up of annual, project, and ad-hoc security testing.

To ensure the security control environment evolves continually to face the growing challenge of cyber threats, Euroclear assesses the internal controls against the SANS top 20 Critical Security Controls (CSC).

109. What technological controls and protections are in place for your systems and networks?

The security of Euroclear systems and network is ensured by a set of various technologies.

These, preventive and detective controls cover the 4 following functions: identification, detection, response and recovery.

Among others: network segregation and segmentation, firewalls, IDS, DLP, antivirus and antimalware, VPN, Strong authentication means (MFA), encryption mechanism, etc.

110. Does your organization use multi-factor authentication?

- Yes
 No

Comments:

Strong authentication is key in our Access Management strategy.

111. Where your organization has outsourced activities or functions to a third-party provider, is your cyber risk exposure documented?

- Yes
 No

Comments:

On top of the very strict selection and onboarding assessment, we conduct periodic risk re-assessments to ensure there is no increase in risk exposure or any emerging risks regarding areas including, but not limited to, cyber security, business continuity process, disaster recover, data protection and financial stability.

112. What measures does your organization have to ensure early detection of a cyber attack?

The IT environment is protected from the external world by firewalls, antivirus and intrusion detection systems and other mechanisms that restrict and control the communications entering and leaving the Euroclear environment.
Anti-virus software is installed and automatically kept up to date to protect servers and PCs against malicious software and viruses. Content checking software is also used to scan web traffic for malicious activity.
Identification and prevention are at the heart of Euroclear's cyber strategy. This strategy is built, on the one hand, upon assessment of the relevant cyber threats on each entity/service. And on the other hand, by prioritizing the most relevant measures and capabilities for each of these entities/service. By doing so, the management can give directions to the initiatives required to further strengthen the cyber defences.
Additionally, a SOC team (i.e. Security Operations Center) is also active 24x7 and constantly looking for potential attacks and identifying and reacting to security incidents.

113. What is the agreed resumption time for critical operations following a cyber attack?

The timeframe depends on the impact level of the cyber-attack and the type of the attack itself. When the crisis management team has invoked the business contingency situation due to a cyber-attack, the data centre switch starts immediately.

For a local disaster plan, the objective is to:

- recover critical applications within one hour (technical RTO).
- return to normal business within two hours (business RTO*).
- experience no loss of data (RPO = 0), as replication of data between DC1 and DC2 is synchronous.

For a regional disaster plan, the objective is to:

- recover critical applications within three hours (technical RTO).
- return to normal business within four hours (business RTO*).
- limit data loss to around one minute (RPO = 1 minute), as replication of data to the third data centre is asynchronous.

* The business RTO accounts for the time needed to process any backlog that may have accumulated during the outage.

114. How would you advise clients of a successful cyber attack against your organization?

There are two methods to advise you:

- We advise clients of significant incidents impacting services or normal connectivity channels via automatic email alerts. Register via the News & Updates app on MyEuroclear (my.euroclear.com). Select the service or connectivity channel you are interested in, subscribe and ensure to tick 'I want to receive time-critical email notifications'.

Emails are sent from euroclear@news.euroclear.com so we recommend you ensure this address is whitelisted and as such not blocked by spam filters.

We regularly test our mass notification tool.

We have launched a new ongoing incidents webpage to provide you with the latest information during operational incidents. The new webpage will complement our time-critical notifications with more details about the operational incident. Kindly note that the webpage will only be accessible during operational incidents for registered users of the Euroclear Bank website.

Your regular commercial contact may also inform you proactively.

115. In the last 12 months has your organization been subject to a cyber attack that impacted the service you provide to us? If yes, please provide details.

Yes

No

Comments:

116. Are the following elements of your cybersecurity framework tested pre and post deployment of changes?

Vulnerability assessment:

Yes

No

Scenario based penetration tests:

Yes

No

Testing of incident response process and technical/business/operations (e.g. table-top exercise):

Yes

No

Other - Please describe in comments:

117. For cloud technology and associated cybersecurity risks, please confirm:

(i) that you have procedures and controls in place to protect our information from mishandling or theft;

(ii) how these procedures and controls tie back to your record retention policy

Yes

No

Comments:

All Euroclear's core activities are performed on Euroclear owned and on-premises hosted applications. Euroclear only uses cloud solutions for non-core operations (i.e. Salesforce and Service Now).

118. Does your organization conduct dark web searches for signs of a breach (internet protocol or customer/client personally identified information for sale)?

Yes

No

Comments:

119. Is your organization aware of SWIFT's Customer Security Program (CSP)?

Yes

No

Comments:

A SWIFT CSP assessment is performed on a yearly basis and final results are published and on SWIFT website.

120. Does your organization ensure compliance with SWIFT's CSP controls?

Yes

No

Comments:

The yearly assessment is closely followed by management. Any identified gap, would result in a proper action plan and integrated into Euroclear's cyber strategy priorities.

121. Does your organization respond to requests for your institution's attestations?

Yes

No

Comments:

122. Does your organization request the attestation details of your counterparties and incorporate the responses into ongoing relationship and risk management programs?

Yes

No

Comments:

As part of the industry standardised due diligence questionnaire issued by the Association of Financial Markets in Europe (AFME) questionnaire, we do request our agents to provide proof of their compliance with SWIFT's CSP controls certification.

Additionally, we rely on a series of questions related to cyber security assurance in AFME questionnaire and complement with additional questions/evidence collection during the on-site visits. Their response is incorporated into our review of our agent relationship and compliance review including the relevant risk management elements. Based on which, Network provides its recommendation to the Euroclear Bank Management Committee who approves all agent links annually.

Please provide any comments you have regarding the questionnaire.

You have reached the end of the questionnaire. Please be sure your contact details are updated. Your contact information is located in the first section of Part One of the questionnaire.