

The Association of Global Custodians - Questionnaire 2020 - 2021

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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- * Please deselect/uncheck any responses in the sub-questions where those responses are no longer applicable.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- * Any responses that appear in open text boxes should be deleted if the information is no longer applicable.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:

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:

shares of public limited companies;
shares of private limited companies;
subscription rights;
warrants;
bonds and corresponding obligations of the debtor;
bonds with warrants and convertible bonds;
Finnish Depositary Receipts (FDR);
a unit in a mutual fund or comparable unit in a foreign joint in-vestment firm;
share in cooperation;
supplementary share in cooperation;
investment share in cooperation;
stocks of cooperation;
money market instruments: treasury bills, certificates of deposit, commercial papers and municipality papers;
debt-rated book entries issued by a private limited company;
book-entries issued for a capital loan referred to in the Limited Liability Companies Act (No 624/2006 as amended);
securities incorporated in Euroclear Finland's system through links with other SSSs.

For more information see the Euroclear Finland's Managing Director's decision on Categories of securities handled in Euroclear Finland's systems.

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:

Euroclear Finland is a for profit organization.

According to Article 49(1) of CSDR, the CSD may charge a reasonable commercial fee for the provision of its services to issuers on a cost-plus basis, unless otherwise agreed by both parties. According to Articles 51(2) and 53(1) of CSDR, the same applies also to a customized link access and access between a CSD and another market infrastructures.

According to Article 38(1) of CSDR, CSDs and their participants shall publicly disclose the levels of protection and the costs associated with the different levels of segregation that they provide and shall offer those services on reasonable commercial terms.

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

Euroclear Finland is wholly owned by Euroclear SA/NV.

6. Please answer the following:

6a. What is the date of establishment of the depository?

31/12/1995

6b. What is the date that the depository's operations began? 01/01/1997

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

Act on Book-Entry System and Clearing Operations (No 348/2017);

Act on Book-Entry Accounts (no 827/1991 as amended);

Act on Certain Conditions of Securities and Currency Trading as well as Settlement Systems (no 1084/1999 as amended);

Limited Liability Companies Act (No 624/2006 as amended);

Regulation (EU) no 909/2014 of the European Parliament and of the Council of 23 July 2014 on improving securities settlement in the European Union and on central securities depositories and amending Directives 98/26/EC and 2014/65/EU and Regulation (EU) No 236/2012. (hereinafter "CSDR")

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.

www.finlex.fi/en

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?

In accordance with the CSDR article 27 the senior management of a CSD shall be of sufficiently good repute and experience so as to ensure the sound and prudent management of the CSD. The management body shall be composed of suitable members of sufficiently good repute with an appropriate mix of skills, experience and knowledge of the entity and of the market.

For further information regarding the composition of the board and the requirements on the board members please see Euroclear's website, www.euroclear.com.

For further details, please refer to the Euroclear Finland Disclosure framework available at <https://www.euroclear.com/dam/DisclosureFrameworks/B3002-3-Euroclear-Finland-Disclosure-Framework.pdf>

7e. What are the election procedures?

The General Meeting of Euroclear Finland appoints the Members of the Board of Directors.

For further information, please refer to the Disclosure Framework document available at <https://www.euroclear.com/dam/DisclosureFrameworks/B3002-3-Euroclear-Finland-Disclosure-Framework.pdf>

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

No limitations.

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 member has one vote.

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

Finnish Financial Supervisory Authority ("FIN-FSA")

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:

Euroclear Finland is supervised by the Financial Supervisory Authority and subject to oversight by the Bank of Finland. The Ministry of Finance has the power to grant and withdraw Euroclear Finland's license to operate as a central securities depository. Euroclear Finland obtained the current license to operate under the Central Securities Depository Regulation on 20 August 2019.

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):

Ministry of Finance

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):

FIN-FSA

11c.

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

11d. Please explain:

FIN-FSA may impose administrative sanctions that are administrative fine, public warning and penalty payment. For more information please see the Act on Financial Supervisory Authority (No 878/2008).

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

Operations, Finance, IT & Projects, HR, Strategy, Legal & Compliance and other support areas.

The Internal Audit unit of Euroclear Group conducts audits under the accountability of Euroclear Finland Head of Audit. The audits are conducted in several parts at multiple occasions throughout the year.

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

Please list the period that the audit covered: 01/01/2020 to 31/12/2020

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 performs statutory financial audits for the Euroclear Group. Euroclear Finland was audited by Revico Grant Thornton Oy in 2018 and 2019.

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

03/04/2020

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

01/01/2019 to 31/12/2019

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.

The external auditor, through the mandate for annual financial audit, covers also operational controls. Independently, Internal Audit of Euroclear covers operational controls as well.

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

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

01/01/2020

to

31/12/2020

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)

17

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?

Chapter 3, Section 1 and Chapter 3, Section 6 of the Act on the Book-Entry System and Clearing Operations and also Chapter 2 of the Rules of Euroclear Finland.

Application instructions for participation in Euroclear Finland

Both available on Euroclear Finland's website; <https://www.euroclear.com/finland/en.html>

17d. Please explain:

All eligibility requirements are stated in the abovementioned law as well as in the Rules of Euroclear Finland. The Rules are available at

<https://www.euroclear.com/finland/en/who-we-are/rules-ceo-decisions.html>

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

0

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?

Chapter 5, Section 1 and Chapter 6, Section 4 of the Act on the Book-Entry System and Clearing Operations and also Chapter 2 of the Rules of Euroclear Finland.

17h. If other, please explain:

Taking into account the scope of operations, the applicant must have adequate technical conditions to participate in the operations referred to in the application and to meet the obligations resulting from it.

On the basis of its earlier operations or for other justifiable reasons, the applicant shall fulfil the requirements relating to adequate legal competence and ethical standard necessary for the task.

Applicant's risk management shall be arranged in such a way as provided by its operations.

17i. How many Individual participants are there currently? (then please answer 17j)

An individual person cannot become an interactive participant in Euroclear Finland.

17j. Please select the features included in the eligibility requirements for Individual participants. (Choose all that apply.)

- Financial Thresholds (please answer 17k)
- Regulatory Oversight (please answer 17k)
- Market Experience (please answer 17k)
- Other (please answer 17l)

17l. If other, please explain:

An individual person cannot become an interactive participant in Euroclear Finland.

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

10

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?

Chapter 5, Section 1 and Chapter 6, Section 4 of the Act on the Book-Entry System and Clearing Operations and also Chapter 2 of the Rules of Euroclear Finland.

17p. If other, please explain:

Taking into account the scope of operations, the applicant must have adequate technical conditions to participate in the operations referred to in the application and to meet the obligations resulting from it.

On the basis of its earlier operations or for other justifiable reasons, the applicant shall fulfil the requirements relating to adequate legal competence and ethical standard necessary for the task.

Applicant's risk management shall be arranged in such a way as provided by its operations.

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

A state, a central bank, a stock exchange, a clearing organization, a central counterparty, a multilateral trading facility, a central securities depository, a securities clearing, settlement or depository institution, a custodian, an administrator of a system compared to the Finnish book-entry system and other corporation.

For further information, please see Chapter 5, Section 1 and Chapter 6, Section 4 of the Act on the Book-Entry System and Clearing Operations.

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

6

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?

Chapter 5, Section 1 and Chapter 6, Section 4 of the Act on the Book-Entry System and Clearing Operations and also Chapter 2 of the Rules of Euroclear Finland. In addition, the Rules of Euroclear Finland are available at <https://www.euroclear.com/dam/EFi/Legal/Euroclear-Finland-Rules.pdf>.

17u. If other, please explain:

Taking into account the scope of operations, the applicant must have adequate technical conditions to participate in the operations referred to in the application and to meet the obligations resulting from it.

On the basis of its earlier operations or for other justifiable reasons, the applicant shall fulfil the requirements relating to adequate legal competence and ethical standard necessary for the task.

Applicant's risk management shall be arranged in such a way as provided by its operations.

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.

Act on Book-Entry Accounts

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:

The Rules and amendments thereto are published on Euroclear Finland's website at <https://www.euroclear.com/finland/en/who-we-are/rules-ceo-decisions.html>.

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:

Euroclear Finland's CEO and Executive Committee in accordance with Euroclear Finland's Rules. The Rules are available at <https://www.euroclear.com/finland/en/who-we-are/rules-ceo-decisions.html>.

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

24a. Please explain:

Euroclear Finland's CEO, supported by Executive Committee, may issue Reprimands, Cautions and impose Disciplinary Fees.

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

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

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:

Please see the question 2b.

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)

27a. Please list the instrument types for which it is not compulsory by law to:

(i) settle in your depository

According to Article 3 of CSDR, any issuer established in the Union that issues or has issued transferable securities which are admitted to trading or traded on trading venues, shall arrange for such securities to be represented in book-entry form as immobilisation or subsequent to a direct issuance in dematerialised form. The book-entry form requirement applies also to transferable securities that are transferred following a financial collateral arrangement.

(ii) safekeep in your depository:

According to Article 3 of CSDR, any issuer established in the Union that issues or has issued transferable securities which are admitted to trading or traded on trading venues, shall arrange for such securities to be represented in book-entry form as immobilisation or subsequent to a direct issuance in dematerialised form. The book-entry form requirement applies also to transferable securities that are transferred following a financial collateral arrangement.

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.

100 % of listed equities. There is no data source available for the other instrument types.

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.

100 % of listed equities. There is no data source available for the other instrument types.

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)

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:

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

31b. If neither/others, please explain:

In conjunction with settlement and securities transfers, Euroclear Finland provides the facility for payment transfers through its central bank accounts in the TARGET2. Euroclear Finland does not operate as a licensed bank providing commercial bank accounts to its participants or third parties. Nevertheless, Euroclear Finland maintains a payment ledger with cash deposit accounts for its participants within each respective clearing and settlement system. These accounts are sub-accounts pertaining to Euroclear Finland's TARGET2 account and can be described as "cash memorandum accounts". Payment transfers for the settlement are handled via TARGET2. A participant normally uses its own account at the TARGET2 as a counter account. The participant can agree to use another organisation's current account as a counter account if the participant does not have a current account of its own.

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

32b. If others, please explain:

Please see the question 31b.

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

33b. If others, please explain:

Please see the question 31b.

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

34b. If others, please explain:

Please see the question 31b.

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

35d. If other services, please explain:

Euroclear Finland acts as the sole registrar/transfer agent in Finland.

Euroclear Finland offers general meeting services, shareholder information and insider register services.

More information about the services offered by Euroclear Finland can be found from <https://www.euroclear.com/finland/en.html>.

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:

Upon receipt of adequate documentation from the Issuer, Euroclear Finland issues the entitlement and credits the accounts on the payment date.

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)

37d. If other please explain:

For equities, Euroclear Finland coordinates the process and delivers the payment lists to the participants according to the confirmations by issuer or issuer's agent. The participants take care of the payments on the payment date. Dividend payments are executed in commercial bank money outside Euroclear Finland.

For Debt market instruments, entitled gross payments for interest payments are calculated within the CSD system, and settlement instructions are created for execution of payments in Central Bank money.

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.

Euroclear Sweden

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:

Euroclear Finland does not disclose this information.

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

43a. If yes, do laws exist, which define as well as protect the rights of beneficial owners with respect to securities registered in nominee name?

- Yes
- No

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)

44b. If yes, please describe briefly how clients of participants would access their securities and whether there would be any delay in their ability to do so:

The fact that an account is a custodial nominee account must be expressly stated in the account (account type). This statement creates a legal presumption for the benefit of the owners behind the account holder. The securities held in a custodial nominee account do not belong to the account holder or to its successors or creditors. The account holder is not able to have a pledge registered for his own benefit in an account held in his own name.

Thus the custodian cannot enforce a lien to the securities in a custodial nominee account (at least not in Finland). In case of a bankruptcy or insolvency of a foreign custodian, the book-entries would not be delivered directly to the bankruptcy estate of the account holder to satisfy the claims of the custodian's creditors. Instead Euroclear Finland would act in accordance with the foreign law and the instructions of the receiver to safeguard the rights of the investors. Thus the investors must be considered to have proprietary rights in respect of the securities instead of a mere contractual claims against the custodian.

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

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

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?

In computer file format.

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)

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:

Documents and records are retained at least for 10 years.

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)?

Infinity, the CSD Clearing and settlement system, for equities and debt instruments, enables settlement in both Delivery versus Payment and Free of Payment methods (also Payment without Delivery). Securities transfers in Infinity become final as soon as the securities transfer has been credited to the book-entry account of the buyer and funds transfer has been credited to the selling participants' deposit in the sub-bookkeeping of the payment transfer account used by Euroclear Finland in settlement operations (if the transfer is instructed as DvP).

Thus finality is reached at the moment of settlement; when the above mentioned securities' and funds' transfers have been executed and settlement process related reservations (optimisation reservation) have been removed.

Securities and funds transfers are executed within the same processing; operated by Euroclear Finland in an enclosed processing system, Infinity. Including both settlement and depository functions within the same environment.

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)

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)

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:

Euroclear Finland acts as the sole registrar in Finland. Changes in the ownership are simultaneously updated to the lists of owners and debtors.

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:

Not applicable.

52j. If other, please explain:

The securities can be removed from the Finnish book-entry system, but after that the securities are not in dematerialized form or held by the depository.

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)

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)

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:

In accordance with Chapter 3, Section 5 of the Act on Book-Entry System and Clearing Operations, the Central Securities Depository (Euroclear Finland) has a statutory lien on securities deposited in a commission account if Euroclear Finland has taken the responsibility of the settlement or paid the delivery. However, Euroclear Finland does not take responsibility of the settlement and does not pay the delivery.

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)

55h. If no, please indicate whether the entire account will be subject to the lien.

- Yes
- No
- Other (please answer 55i)

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:

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)

56a. When does title or entitlement to depository securities pass between participants? (Choose one.)

- At the end of the business day on which the transfer occurs. (please answer 56c)
- When corresponding money or other consideration is transferred. (please answer 56c)
- When the transaction is processed on an intra-day basis. (please answer 56c)
- Other (please answer 56b)

56c. Where does title or entitlement to depository securities pass between participants? (Choose one.)

- On the depository books
- On the registrars books
- Other (please answer 56d)

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:

Euroclear Finland handles only dematerialized securities.

In legal terms, Finnish dematerialized book-entry securities can be described as physical securities turned into electronic form. When a company joins the book-entry system, the physical share certificates shall be withdrawn from circulation and invalidated. In place of the invalidated certificates the shareholders receive an equivalent amount of book-entry shares into their accounts opened in the book-entry system. According to the law, no physical security shall be issued on the existence or contents of a book entry. Unlike physical certificates, book-entries can per definition not be transferred as such outside the book-entry system.

The holder of a security may apply for the registration of his holding from the account operator designated by the issuer. The applicant shall convey his security to the account operator and prove that he has the right to dispose of the security. The account operator shall register the security in the book-entry account designated by the applicant in compliance with the provisions of the Act on Book-Entry Accounts.

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

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)

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)

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

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

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.

Not applicable.

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.

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)

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)

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)

66b. 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 66c)

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)

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)

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)

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:

Euroclear Finland is liable for direct loss caused to a participant by willful or negligent breach of Euroclear Finland's Rules or the CEO's Decisions by the personnel of Euroclear Finland.

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

67d. Insurance

Yes (please answer 67e)

No

Other (please answer 67e)

Not applicable

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):

According to the Rules of Euroclear Finland, Euroclear Finland is liable for direct loss caused to a participant by wilful or negligent breach of these Rules or the Decisions issued hereunder by the personnel of Euroclear Finland.

With regard to operations subject to the agreement, Euroclear Finland is liable only for direct loss caused to a participant by wilful or negligent act by Euroclear Finland or an employee thereof as well as wilful or negligent act by a third party providing services relating to the operations subject to the agreement on the basis of an agreement concluded with Euroclear Finland or a person employed thereby.

Euroclear Finland may not be held liable for loss of interest, lost profits, loss arising from other contractual relations or for other indirect loss to a participant. Euroclear Finland may not be liable for loss caused by the operation of the payment systems maintained by the Bank of Finland or by other banks.

The Rules of Euroclear Finland can be found at <https://www.euroclear.com/finland/en/who-we-are/rules-ceo-decisions.html>.

These Rules, however, do not limit the statutory liability of Euroclear Finland based on Sections 30–32 of the Act on Book-entry Accounts or Chapter 4, Section 6 of the Act on Book-Entry System and Clearing Operations.

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

Euroclear Finland's rules 1.7.7. – 1.7.13 and the standard participant agreements.

The Rules of Euroclear Finland can be found at <https://www.euroclear.com/finland/en/who-we-are/rules-ceo-decisions.html>.

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

Entity Name

Finland Euroclear Finland Ltd

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

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)

71f. How often?

Monthly

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? 3

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:

SWIFT and NCSN-network

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)

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)

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

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)

78a. If yes, please respond to the following questions:

What is the size of the fund (then please answer 78b)?

The minimum size of the fund is regulated in Chapter 4, Section 7 of the Act on the Book-Entry System and Clearing Operations. In principle, the size of the fund shall be determined by asset value and participant volume. Nevertheless, the minimum size of the fund is always EUR 20 million.

Full details can be found in the Rules of the Fund at <https://www.euroclear.com/dam/EFi/Legal/FundRulesOffinnishCentralSecurityDepository.pdf>.

78b. How is the size of the fund determined? (Choose one.)

- By participant volume
- By asset value

- A fixed amount
- Other (please answer 78c)

78c. If other, please explain:

The minimum size of the fund is regulated in Chapter 4, Section 7 of the Act on the Book-Entry System and Clearing Operations. In principle, the size of the fund shall be determined by asset value and participant volume. Nevertheless, the minimum size of the fund is always EUR 20 million.

Full details can be found in the Rules of the Fund at <https://www.euroclear.com/dam/EFi/Legal/FundRulesOfFinnishCentralSecurityDepository.pdf>.

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)

78g. If other, please explain:

The fund consists of collateral payments provided by the participants (account operators) and the fund receives some funding from retained earnings.

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:

Account operators have to make collateral payments in accordance with the Rules of the Finnish Central Securities Depository Fund. The purpose of the Fund is to safeguard the fulfillment of the legal liability in damages of an account operator up to the statutory maximum. If the account operator is unable to meet its liability in damages provided for in the Act on Book-Entry Accounts, the injured party shall be entitled to compensation from the Registration Fund.

Full details can be found in the Rules of the Fund at <https://www.euroclear.com/dam/EFi/Legal/FundRulesOfFinnishCentralSecurityDepository.pdf>.

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)

79g. Please explain:

Euroclear Finland settlement system, Infinity, operates RTGS in a continuous and real-time DVP mode. The system fulfills the Lamfalussy-Recommendations using BIS – DVP model 1. A transaction is cleared and settled on the settlement date as soon as the seller has the book-entries subject to the transaction in his book-entry account available for settlement and when the payment needed in settlement has been deposited in the respective cash memorandum account by the buyer. Settlement occurs with finality by registering the transfer with a debit from the seller's book-entry securities account and a credit to the buyer's account and by entering a transfer between the respective cash memorandum accounts in an incessant and simultaneous process.

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

The changing over from primary systems to back-up facilities is tested several times every year either with or without participants. Last date of testing was 26 September 2020.

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

Stock exchange

Not applicable

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

Central bank

Testing takes place at least twice a year. Last test was 16 December 2020.

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

Local brokers

The changing over from primary systems to back-up facilities is tested several times every year either with or without participants. Last date of testing was 26 September 2020.

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

Any other third party

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)

84b. If so, please list webpage address:

In case of very serious and large scale interruptions www.euroclear.com

84c. If so, please list all publications:

In case of very serious and large scale interruptions, the most important financial publications might be informed.

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)

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)

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

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:

Subject to the requirements imposed by the regulatory bodies, Euroclear Finland maintains a minimum regulatory capital requirement.

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?

This information is not disclosed publicly.

92b. What is the amount of the deductible?

This information is not disclosed publicly.

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?

This information is not disclosed publicly.

93b. What is the amount of the deductible?

This information is not disclosed publicly.

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?

This information is not disclosed publicly.

94b. What is the amount of the deductible?

This information is not disclosed publicly.

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 disclosed publicly.

95b. What is the amount of the deductible?

This information is not disclosed publicly.

96. Does the depository have any other insurance?

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

96b. What is the amount of the coverage?

96c. What is the amount of the deductible?

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.

This information is not disclosed publicly, but it is the policy of the Euroclear group to hold insurance policies with first rank insurance companies, rated at least A-.

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

N/A

97b. What is the term of the policy?

N/A

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.

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:

The responses provided here and especially in respect of Euroclear Finland's liability regime provide only a general description of certain matters relating to Euroclear Finland and its operating environment and should not be relied upon as a complete disclosure of such matters.

Handling of securities outside the depository environment: Euroclear Finland handles only dematerialised securities.

Euroclear Finland acts as the sole registrar/transfer agent in Finland.

14b. Please list the date of your last internal audit: Q1/2020, Q2/2020 and Q4/2020.

16b. Please list the date of your last operational audit performed by an Audit Firm, Regulatory Authority, or other external party: December 2020.

98a. Upload document here:

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:

www.euroclear.com

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:

The cybersecurity policy is not publicly available.

As a systemically important financial institution, supporting FMs, Euroclear must develop and maintain resilient, secure and efficient post-trade services. As a processor of high-volume and value transactions and as a guardian of client and market sensitive information, Euroclear ensures that its Information Security Management System (ISMS) is holistic and addresses threats to confidentiality, integrity and availability in line with its low risk appetite for operational risks.

The Information Security Management System Policy handbook provides the principles of how Euroclear Finland, as part of Euroclear Group, maintains the required level of information security, safeguards its information assets, the interest of its key stakeholders, reputation, brand and value-creating activities system.

The policy handbook is based on market best practices and recognized industry standards ISO27001:2013 and complements the EFi Operational Risk Board Policy, which introduces the guiding principles of operational risk management at EFi. It sets the tone for the risk culture, defines how EFi Board expects management, staff and contractors to manage the risks they face in pursuing our corporate strategy.

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

Yes

No

Comments:

Euroclear Finland (EFi) ensures that all employees and contractors receive training to develop and maintain appropriate awareness for detecting and addressing cyber-related risks. All new EFi employees receive security awareness training following the policy guidelines. In addition, Euroclear has ongoing security awareness program (e-trainings etc) that is mandatory for all employees.

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.

EFi aims to maintain and promote the ability to anticipate, withstand, contain and recover from cyber attacks, to limit the likelihood or impact of a successful cyber attack on its operations.

EFi collaborates with relevant stakeholders to effectively respond to and recover from cyber attacks, whether on EFi or on the financial system as a whole.

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

Yes

No

Comments:

Annual review, minor updates.

105. Please advise how often you review the policy.

Semi-Annually

Annually

Other

Comments:

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

Comments:

The EFi CISO (chief information security officer) reports to EFi CTO who is a member of EFi Executive Committee and has a direct access to EFi Board.

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

EFi monitors and manages the cyber threat landscape, regularly reviews and actively mitigates cyber risks. EFi proactively adapts its defense (policies, controls & architectural elements) and increases its readiness and response to security incidents.

Business functions in EFi are subject to yearly Business Impact Analysis and Risk Assessments. In addition, IT infrastructure is regularly tested with various methods.

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:

EFi is following a yearly security testing roadmap and applications are subject to security practices during development.

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

EFi has several controls and protection mechanisms on end-points, servers and network using a layered onion approach.

110. Does your organization use multi-factor authentication?

Yes

No

Comments:

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

Yes

No

Comments:

Outsourced activities are subject to yearly risk assessments

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

EFi has detection capabilities in place on whole IT infrastructure as well as threat intelligence.

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

The resumption time for the EFi critical operations is 2 hours.

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

EFi would deploy our crisis communication plan, which is developed for any kind of crisis and emergency communication and was recently tested, when Euroclear Finland activated its business continuity plan for covid-19 in March 2020. Crisis communication tools and processes are regularly reviewed and rehearsed in collaboration with Euroclear Group.

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:

Euroclear Finland does not share this information.

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:

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:

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

- Yes
- No

Comments:

Up-to-date EFi's CSP compliance status is available in SWIFT KYC portal.

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:

Please provide any comments you have regarding the questionnaire.

Item 70b: A more precise answer would be " Secured, dedicated network connection".

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.