

Self-assessment for the SEPA-compliance of infrastructures

Based on Terms of Reference established by the European Central Bank as published in the 5th Progress Report of SEPA (July 2007) and available on the website of the ECB, www.ecb.eu

The ECB Terms of Reference have been transferred to this paper and we have provided our responses to the questions on the following pages.

Criterion 1 – Processing capabilities

To promote the SEPA-compliance of infra-structures, infrastructures are asked to comply with the requirements of the PEACH/CSM Framework, the SCT Rulebook and / or the SDD Rulebook(s), the Implementation Guidelines and the associated UNIFI (ISO20022) XML standards, and to be ready to support the scheme testing as planned by the EPC.

Number	Q / A	Question / Answer
1.	Q	<i>Have you sent a Disclosure Letter to the EPC regarding your intention to become a SEPA compliant CSM?</i>
	A	Yes. The Disclosure Letter was sent 25 January 2008 to the EPC confirming Eurogiro's intent to be a SEPA Credit Transfer compliant SCM.
2.	Q	<i>Are you compliant with the relevant PEACH /CSM Framework?</i>
	A	Yes.
3.	Q	<i>Are you compliant with the relevant SCT Rulebook?</i>
	A	Yes.
4.	Q	<i>Are you compliant with the relevant SDD Rulebook(s), i.e. core service and, if and when adopted, Business-to-Business service and e-mandate service?</i>
	A	We will provide the basic messaging exchange of SDD to participants according to the specifications, but will not provide add-on services like e-mandate services.
5.	Q	<i>Are you complying with the relevant guidelines that require the use of the UNIFI (ISO 20022) XML message standard?</i>
	A	Yes.
6.	Q	<i>Are you able to deliver all mandatory payment information (from the so-called yellow data fields) in full and without alteration between the involved participants?</i>
	A	Yes.
6a.	Q	<i>Please provide information on your ability to process the full SEPA-subset of the ISO 20022 XML messages (i.e. the yellow and white data fields)</i>
	A	Fully compliant with SEPA Credit Transfer Scheme Inter-Bank Implementation Guidelines v3.2
7.	Q	<i>If you provide conversion between XML and legacy formats (and/or v.v.), do you ensure that no payment data is lost?</i>
	A	Not applicable.
8.	Q	<i>Have you adequately tested your processing procedures?</i>
	A	Yes.

8.a	Q	<i>Please describe the framework, the organization, the scope (national or cross-border) and the reach (SCM-bank, bank-CSM-bank, end-to-end) of the testing</i>
	A	Our tests have been: <ul style="list-style-type: none"> • bank-SCM-bank with several banks • Cross-border • by dedicated test team

Criterion 2 – Interoperability

To promote the SEPA-compliance of infrastructures, infrastructures are asked to adopt interoperability rules, i.e. interface specifications and business procedures for the exchange of SEPA credit transfers and SEPA direct debit payment orders between banks and infrastructures, and between infrastructures, that are preferably mutually agreed upon by the relevant CSMs, and undertake to establish a link with any other infrastructure upon request, based on the principle that the cost for establishing the link is borne by the requesting infrastructure.

Number	Q / A	Question / Answer
9.	Q	<i>Have you adopted interoperability rules, i.e. interface specifications and business procedures for the exchange of SEPA credit transfers and SEPA direct debit payment orders between banks and infrastructures, and between infrastructures?</i>
	A	Yes, between banks and Eurogiro.
9a.	Q	<i>If yes, are the interoperability rules you are using mutually agreed upon by the relevant CSMs?</i>
	A	Not applicable.
9b.	Q	<i>please describe, especially where you are not using mutually agreed interoperability rules, the relevant elements for interoperability (message formats, cut-off times, clearing and settlement procedures, reconciliation and control procedures);</i>
	A	Not applicable.
9c.	Q	<i>are you compliant with other relevant rules, guidelines or practices which aim at ensuring interoperability (e.g. the "CSM Market Practices")?</i>
	A	Not applicable.
10.	Q	<i>Would you undertake to establish a link with any other infrastructure upon request?</i>
	A	Yes, if so requested by another CSM or a Eurogiro customer.
10a.	Q	<i>Have one or several links been established? If yes, please provide names of the participating infrastructures;</i>
	A	No.
10b.	Q	<i>a link would ideally be created on the basis of a mutually beneficial</i>

		<i>business case. In absence of such a business case, the requesting infrastructure provider would have to bear the costs of the requested link (setting up and maintenance thereof). Who bears the costs of the established link(s)?</i>
	A	Not applicable.
10c.	Q	<i>have you considered, either on your own initiative or upon request, changing the internal processing procedures in order to increase the efficiency of a link? Have any such changes been carried out?</i>
	A	Has not yet been relevant. However, we regularly consider our processing procedures in order to increase efficiency.
10d.	Q	<i>how are the transfers between CSMs settled?</i>
	A	Not applicable.

Criterion 3 – Reachability

To promote the SEPA-compliance of infrastructures, infrastructures are asked to be able to send or receive euro payments to and from all banks in the euro area, either directly or indirectly through intermediary banks, or through links between infrastructures (in other words, to provide full reachability)

Number	Q / A	Question / Answer
11.	Q	<i>Are you able to send euro payments from your participants and receive euro payments for your participants, to and from all SEPA scheme participating banks in the euro area, either directly or indirectly through intermediary banks, or through links between infrastructures?</i>
	A	Yes. Directly if both parties are participants in Eurogiro, indirectly via participating banks that offer to act as intermediaries. We have standard offers to the Eurogiro community from Deutsche Postbank, Deutsche Bank and Banco Bilbao Vizcaya Argentaria (BBVA) who are all direct participants in EBA Step2 and also link to other CSMs.
11a.	Q	<i>Please describe how many SEPA scheme participating banks you can reach (directly or indirectly) on the basis of contractual arrangements;</i>
	A	Minimum equivalent to the reach provided by EBA Step2 & Step1 and Target2.
11b.	Q	<i>how do you ensure that you are able to route a payment to each bank in the euro area that is participating in the SEPA scheme(s)?;</i>
	A	By offering our participants to choose to connect via one of the partner participants that offer indirect links to the EBA Step2, supplemented by links to additional CSMs.
11c.	Q	<i>please describe how you obtain the necessary routing information. If you use your own routing database, how do you update it, i.e.</i>

		<i>how do you obtain the latest information from all SEPA scheme participating banks in the euro area? How do you address possibly conflicting information if a SEPA scheme participating bank is reachable via several payment channels? How is routing decided where there are several possibilities for reaching a SEPA scheme participating bank?;</i>
	A	We use global registration of the capacity of each direct member. Sending member decides routing based on this information.
11d.	Q	<i>How much time (in days) do you need to reach every SEPA scheme participating bank, respectively be reached by every bank in the euro area that is participating in the SEPA scheme(s)? Will you be able to reach every SEPA scheme participating bank within one business day at the latest by 2012?;</i>
	A	Our services enable the participants to observe the timelines for the processing of SCT, as defined in the SCT Rulebook. We intend to enhance our services to meet the timeframes that will be requested in the future.
11e.	Q	<i>If you currently do not offer full reachability to your participants, do you intend to offer it at a later point in time? If so, how will you achieve this and by when?</i>
	A	Not applicable.

Criterion 4 – Choice for banks

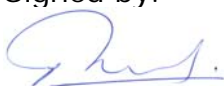
To promote the SEPA-compliance of infrastructures, infrastructures are asked to enable financial institutions to make infrastructure choices based on service and price, and therefore not apply undue access restrictions, nor set obligations for users to process certain types of payment in a specific infrastructure, or via specific proprietary standards, nor to impose participation obligations on users of other infrastructures, and to ensure full transparency of services and pricing

Number	Q / A	Question / Answer
12.	Q	<i>Have you made your retail payments clearing service offerings and your fee structure (including information (and amounts) about all types of applicable fees, such as admission fees, periodical fees, transaction fees or package fees) publically available?</i>
	A	This information is available on our website for customers and on request against signing of a NDA.
13.	Q	<i>Do you refrain from applying different access conditions depending on the type of applicant, its location or other kind of considerations?</i>
	A	Yes.
14.	Q	<i>Do you refrain from obliging your participants to process certain SEPA payments in a specific infrastructure?</i>
	A	Yes.

15.	Q	<i>Do you refrain from obliging your participants to use specific proprietary standards for SEPA payments?</i>
	A	Yes.
15a.	Q	<i>If no, please describe the proprietary standards for SEPA payments that you oblige your participants to use;</i>
	A	Not applicable.
16.	Q	<i>Do you refrain from imposing participation obligations on the users of other infrastructures when another CSM is requesting a link??</i>
	A	Not applicable.

Date: 11 June 2009

Signed by:



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