## Consultation on the Scope and Implementation of CHESS replacement Release 2 (Settlement and Subregister)

	Question	Response (please enter your input in column D)	Guidance notes to complete column D
Respondent Details	Would you like your response to be confidential? Name	No Matthew McMahon	select the applicable response from the drop down First Name & Last name
	Email		Email
Organisation	Organisation Please select your organisation type (select all that apply)	ABN AMRO Clearing Sydney Pty Ltd	Organisation Name election option: AMO
Cohort	See choices in column E	Clearing and Settlement Participant	election option: Clearing and Settlement Participant election option: Settlement-only Participant
			election option: Payment Provider
			election option: Share Registry election option: Software Provider
			election option: Industry Association election option: Other (Please specify below)
	If you answered - Other above please specify		Please complete if you answered 'Other' above (free text)
Q1	Please provide any feedback on the proposed design, scope	ABN AMRO has been an active participant in all ITWG, BDWG and CHESS Technical Committee meetings to date. Relating to these meetings	Free text
	and schedule for Release 2.	commencing in late 2023 and the on-ongoing workshops and meetings through 2024, ABN AMRO has provided written feedback via email and verbally via bi-lateral meetings on key topics we believe has significant impacts to our clearing and settlement activities in CHESS. These key topics are covered in the subsequent questions provided in this consultation paper.	
Q2	Please provide any feedback on the proposed testing and industry readiness approach for Release 2.	ABN ANRO has been an active participant in all TIWG, BDWG and CHESS Technical Committee meetings to date. Relating to these meetings to commencing in 2023 and the on-noginging workshops and meetings through 2024, ABN ANRO has provided writer bedabed via email and verbally via bi-lateral meetings on key topics we believe has significant impacts to our clearing and settlement activities in CHESS. These key topics are covered in the subsequent questions provided in this consultation paper.	Free text
Q3	Please provide any feedback on the proposed approach to interoperability for CHESS replacement.	ABN AMRO welcomes the introduction of the CHESS replacement system interoperability functionality.	Free text
Q4	Please provide any feedback on the proposed timing and	ABN AMRO as outlined in the T+1 settlement cycle whitepaper, believe a number of CHESS Replacement stage 2 new functionalities are key	Free text
	approach regarding transitioning to a T+1 settlement cycle (noting that any such transition will not form part of the CHESS replacement project).	to supporting a highly efficient pre-matching settlement environment with low fail settlement rates as has been experienced in the recent US market transition to T+1 settlements. As such we support the ASX's recommended proposal for transition to T+1 after Release 2.	
Q5	Does your organisation support the scope of the clearing upgrades for CHESS replacement Release 2?	Supportive	select the applicable response from the drop down
	Please provide context to your response above	ABN is supportive of the scope of the clearing upgrades for CHESS replacement Release 2. We recognise the challenge of balancing the introduction of numerous new functionality builds involving multiple industry stakeholders versus a successful implementation of a complex project. The proposed scope delivers the primary objectives of the project which includes providing immediate efficiency improvements and costs reductions for market participants.	Free text
Q6.1	Would your organisation use an optional segregated	Not applicable to my organisation	select the applicable response from the drop down
	account structure if offered by the CHESS replacement system?		
Q6.2	If you answered yes or possibly to Q6.1, which account structure would suit your organisation best?	Not applicable to my organisation	select the applicable response from the drop down
	If you answered - Other above please specify  Please provide context to your response above		Please complete if you answered 'Other' for question 6.2 in cell D25 (free text in cell D26)  Free text for question 6.2
Q6.3	Please provide any further information about the proposed optional segregation models.		Free text
Q7	Does your organisation support the proposed scope of settlement for CHESS replacement Release 2?	Supportive	select the applicable response from the drop down
	·		
	Please provide context to your response above	ABN is supportive of the proposed scope of settlement for Release 2, we welcome the additional enhancements offered by the TCS BaNCS MII product. As previously advised in regards to hold and release bilateral matching improvements, we do believe there should be a defined cut-off time prior to settlement cut-off when the holds are locked in for settlement and participants such as ourselves can go and borrow stock as required to meet our market obligations with confidence of knowing what messages are scheduled for settlement. Additionally we would welcome to the ASX market the European CSOR penalty fer ergime, whereby any messages on hold which to settle on the intended settlement date are subject to cash penalties. In CHESS world these are for accettable continuous and not market obligations towards the CCP. For this CSOR penalty fee there is an amount debited from the participant causing the settlement failure and credited to the participant impacted by the settlement fail.	Free text
Q8	Does your organisation support simplifying the processing of 'ex transactions' (i.e. Cum Entitlement Balances)?	Not supportive (please explain below)	select the applicable response from the drop down
	Please provide context to your response above	The Cum Entitlement Balances functionality is key to the stock lending market due to its risk mitigating process what is commonly known as a collateral cum-ex dividend swap. The settlement of stock borrow on a cum-dividend basis is also extremely important on both the dividend ex-dividend and record dates. In the case of other corporate actions such as renounceable rights issue and accelerated rights issues, the ability to transfer between ABN AMRO and its stock lending counterparties is also a key risk mitigating factors othat the responsibility for the processing of the corporate action event can be handled by the legal owner of the shares. It is important to the stock lending market that these practices can be continued.	
Q9	Does your organisation support the proposed scope of	Supportive	select the applicable response from the drop down
	subregister and issuer sponsored processes for Release 2?  Please provide context to your response above	Generally ABN AMRO is not highly active in processing issuer sponsored but welcomes the additional features that provide an improved investor experience. This could be delayed until a further release after go-live.	Free text
Q10	Does your organisation support the proposal to enhance registration details and allow for the sharing of additional	Supportive	select the applicable response from the drop down
	investor information? Please provide context to your response above	The sharing of additional investor information will also provide an improved investor experience. This could be delayed until a further	Free text
		release after go-live.	

## Consultation on the Scope and Implementation of CHESS replacement Release 2 (Settlement and Subregister)

What additional investor information would your organisation find useful to be transmitted via CHESS? - See choices on column E (and select all that apply, via separate rows in column D)  Foreign Account Tax Compliance Act (FATCA) / Common Reporting Standard (CRS) details such as tax residency and foreign tax identification number(s)  Foreign Account Tax Compliance Act (FATCA) / Common Reporting Standard (CRS) details such as tax residency and foreign tax identification and foreign tax identification and foreign tax identification number(s)  Election option: Bank account details  election option: Bank account details  election option: Other (Please specify)				
Market   M		Question  What additional investor information would your	Response (please enter your input in column D)	Guidance notes to complete column D  election option: Tax File Numbers (TFNs), Australian Business
With a service of the company of the	,	organisation find useful to be transmitted via CHESS? - See		
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## Consultation on the Scope and Implementation of CHESS replacement Release 2 (Settlement and Subregister)

Reference		Response (please enter your input in column D)	Guidance notes to complete column D		
	be avoided	Only January and December due to change freezes and limited staffing over the holiday period.	Free text		
Q18	Do you have any further feedback on ASX's proposed implementation approach for Release 2?	ABN ANRO supports ASXâc <sup>™</sup> s recommendation to proceed with Release 2 as one release. We agree this is the best approach for risk mitigation and successful implementation of such a large and complex project.	Free text		
Q19.1	If a decision is made to move to T+1, is your organisation supportive of ASX's proposal that a T+1 go-live date be at least 12 months after the Release 2 go-live date, and at a minimum 18 months after a decision to transition to T+1?	Supportive	select the applicable response from the drop down		
	Please provide reasoning for your response above	ABN ANRO expects the market to agree to transition to T+1 settlements well in advance of the CHESS Replacement go-live date anticipated in 2029. As such we support an ASX T+1 go-live date to be at least 12 months after the Release 2 go-live date, this should allow sufficient time for all market participants and industry stakeholders to make additional preparations for the transition.	Free text		
Q19.2	Are there any other factors that ASX should consider regarding approach and timeline for a transition to T+1 settlement? If so, please provide further detail.	N/A	Free text		
Q20.1	With the information currently provided, is your organisation supportive of the time for Software Providers to complete their build and test in preparation for accreditation? Please explain, including relevant detail if not supportive	ABN AMRO is supportive of the time for Software Providers to complete their build and test in preparation for accreditation	Free text		
Q20.2	To assist Software Providers with their industry testing, do you have any further feedback on testing scope, duration or approach?	N/A	Free text		
Q21.1	With the information currently provided, is your organisation supportive of the time for CHESS Users to complete their testing in preparation for Operational Readiness? Please explain, including relevant detail if not supportive	ABN AMRO is supportive of the time for CHESS Users to complete their testing in preparation for Operational Readiness. ABN AMRO will be prepared to complete all testing required within the designated timeframes. Resources required for project planning and testing will be allocated and dedicated to complete testing requirements.	Free text		
Q21.2	To assist CHESS Users with their industry testing, do you have any further feedback on testing scope, duration or approach?	N/A	Free text		
Q22	To assist CHESS Users with their go-live readiness, do you have any further feedback on testing scope, duration or approach?	N/A	Free text		