

# The Association of Global Custodians - Questionnaire 2025 - 2026

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- \* Please deselect/uncheck any responses in the sub-questions where those responses are no longer applicable.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the information from view.\* Any responses that appear in open text boxes should be deleted if the information is no longer applicable.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

Nasdaq CSD SE is Central Securities Depository authorised under Regulation (EU) No 909/2014 (CSDR) and supervised under Latvian FSA (FCMC) [link to website for further information about Nasdaq CSD SE can be found as follows:

- (1) Governance - [https://nasdaqcsd.com/governance/]
- (2) Responses to CPMI clarifying among others organizational, legal and governance aspects - [https://nasdaqcsd.com/rules-regulations-and-compliance/]
- (3) Rules of Nasdaq CSD – [https://nasdaqcsd.com/rules-regulations-and-compliance/]

### 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:**

All types of securities issued by the Government and public companies registered in Estonia, Iceland, Latvia and Lithuania (equities, bonds, money market instruments and other financial instruments).

**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)

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

Nasdaq Nordic Ltd., 100%

**6. Please answer the following:**

**6a. What is the date of establishment of the depository?** 14/09/2017

**6b. What is the date that the depository's operations began?** 17/09/2017

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

The Depository, with its head office in Latvia and branches in Estonia, Iceland and Lithuania, is authorised by the FCMC to provide CSD services under the CSDR and to act as the registrar of the Estonian Register of Securities. The Depository operates in the form of Societas Europaea (SE) within the meaning of the Council Regulation (EC) No 2157/2001 of 8 October 2001 on the Statute for a European company (SE), in accordance with Latvian Commercial Law and the Law on European Companies.

**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.**

Principal laws applicable to the Depository and all the Settlement Systems as amended:

<https://nasdaqcsd.com/rules-regulations-and-compliance/laws/>

**7c. Please supply document(s) here:**

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

**What are the qualifications to become a board member?**

The Management is composed in such a way that it is able to perform its duties properly. The members of the Management should be suitable in relation to the following subjects: management, organization and communication; products, services and markets in which the Company operates; controlled and sound business operations; and balanced and consistent decision-making. For more information please see response 1a.

**7e. What are the election procedures?**

The Chairperson of the Management is elected by the Company's Council from among the Management Members. The deputy Chairperson of the Management is elected by the Company's Council from among the Management Members. The members of Management are appointed and reappointed by the Council in the manner provided in the Commercial law of Latvia and the Company's Articles of Association.

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

The members of Management are appointed and reappointed for a maximum term of three years.

**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)?**

One management board member holds one vote.

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

The Management is accountable to the Council and the General Meeting of Shareholders.

**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:**

Bank of Latvia.

Financial security authorities (FSAs) of Estonia, Iceland and Lithuania are involved in accordance with CSDR.

**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)

**10a. Please explain:**

Yes, the Despository is a subject to periodical examination in accordance with CSDR article 22.

**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):**

See question 9.

**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):**

**11c.**

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

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

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

## Capital

### 13. Are annual financial statements publicly disclosed?

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

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

- Yes (please answer 13b)

No (if no, please send a copy of the annual report to the Washington office of Baker & McKenzie, 815 Connecticut Ave., NW, Washington, DC

- 20006, Attn: Robin Truesdale)

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

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

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

<https://nasdaqcsd.com/governance/annual-reports/>

## 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?

Various areas are audited by Internal Audit on continuous basis- Operations, IT, Ancillary Services etc.

The audit process does not occur as a single-day event but is conducted over an extended timeframe. The comprehensive assessment is distributed across multiple business days and may span several weeks to ensure thorough evaluation of all relevant areas.

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

Please list the period that the audit covered:

31/10/2024

to

30/10/2025

### 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? If Yes provide a link or Share.

- 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.**

Financial audit of Nasdaq CSD SE is performed by Ernst & Young Baltic and Iceland. The audit process does not occur as a single-day event but is conducted over an extended timeframe. The comprehensive assessment is distributed across multiple business days and may span several weeks to ensure thorough evaluation of all relevant areas.

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

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

31/12/2023 to 30/12/2024

**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? If yes, provide link or share.**

- 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.**

Operational audit is usually performed by regulatory authority - Latvijas Banka.

The audit process does not occur as a single-day event but is conducted over an extended timeframe. The comprehensive assessment is distributed across multiple business days and may span several weeks to ensure thorough evaluation of all relevant areas.

**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:**

31/12/2022 to 30/12/2024

**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? If yes, provide link or share.**

Yes

**Link:**

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)**

There are 22 banks (legal entities) participants of the Depository participating in Estonian, Iceland, Latvian and Lithuanian SSSs.

**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?**

Eligibility criterias applied per participants are described in Chapter I of Nasdaq CSD Rulebook, section 3.1.2 - 3.2.6 [<https://nasdaqcsd.com/rules-regulations-and-compliance/>]

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

There are 12 brokerage companies (legal entities) participants of the Depository participating in Estonian, Iceland, Latvian and Lithuanian SSSs.

**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?**

Eligibility criterias applied per participants are described in Chapter I of Nasdaq CSD Rulebook, section 3.1.2 - 3.2.6 [<https://nasdaqcsd.com/rules-regulations-and-compliance/>]

**17k. Where can a description of the specific eligibility requirements for Individual participants be found?**

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

There are 3 foreign institutions (legal entity, participant of the Depository) participating in Estonian, Iceland, Latvian and Lithuanian SSSs.

**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?**

Eligibility criterias applied per participants are described in Chapter I of Nasdaq CSD Rulebook, section 3.1.2 - 3.2.6 [<https://nasdaqcsd.com/rules-regulations-and-compliance/>]

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

Other entities are described as Central Banks, State Treasury, credit unions.

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

There are 4 Depository participants under status "other entities".

**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?

Eligibility criterias applied per participants are described in Chapter I of Nasdaq CSD Rulebook, section 3.1.2 - 3.2.6 [<https://nasdaqcsd.com/rules-regulations-and-compliance/>]

### 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
- By-laws of the depository
- Rules of the depository
- Other (please answer 20a)
- Not applicable

### 20b. Please provide a link to the rulebook.

## 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 that 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.**

Please see specification provided in 1a.

**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:**

On the website of Nasdaq CSD.

### **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:**

Please see specification provided in 1a.

**24. What enforcement actions are available to the enforcement authority? (Choose all that apply.)**

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

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

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

**25a. If yes, please explain, including information relative to any suspensions of depository participants:**

**25b. If other, please explain:**

**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:**

Shares of the private limited company, investment fund units, rights issues.

**27-1. For all instrument types eligible for settlement in your depository, please confirm if settlement is compulsory by law or compulsory by market practice, or both? (Choose all that apply.)**

- Yes by law for all instrument types (please answer 27-1a)
- Yes by market practice for all instrument types (please answer 27-1b)
- Yes by law and by market practice, for all instrument types (please answer 27-1b)
- Varies by instrument, please specify (please answer 27-1c)

**27-2. For all instrument types eligible for safekeeping in your depository, please confirm if safekeeping is compulsory by law or compulsory by market practice, or both? (Choose all that apply.)**

- Yes by law for all instrument types (please answer 27-2a)
- Yes by market practice for all instrument types (please answer 27-2b)
- Yes by law and by market practice, for all instrument types (please answer 27-2b)
- Varies by instrument, please specify (please answer 27-2c)

**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 depository, exclusive of your links with third parties. (e.g. 60% of all bonds in the total market is settled within your depository, whereas 40% is settled outside of your depository.)**

Stock exchange and OTC trades in financial instruments that are registered with the Depository must be settled within the Depository. All financial instruments that are in public circulation have to be registered with and settled within the Depository.

**28b. Please list by instrument type the percentage of the total market in your jurisdiction (either volume or value) safekept within your depository, exclusive of your links with third parties. (e.g. 60% of all bonds in the total market is safekept within**

**your depository, whereas 40% is safekept outside of your depository.)**

<https://nasdaqcsd.com/statistics/latvia/en/capitalization>

<https://nasdaqcsd.com/statistics/latvia/en/summary>

**29. Are there any settlement/operational activities performed by a third party on behalf of the depository for the depository participants?**

Yes (please answer 29a)

No

**29i. If other, please explain:**

**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:**

No, according to the best of our knowledge.

**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

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

Depository

Central Bank

Banks appointed by depository (please answer 32a)

Neither/others (please answer 32b)

Not applicable

**32a. Please name banks appointed by depository:**

Central Bank for T2S EUR settlement, Depository instructs SEB for USD settlement. Central Bank of Iceland for ISK settlement.

Nasdaq CSD operates exclusively as a central securities depository and does not hold a banking license. Consequently, the CSD does not provide cash deposit services, credit lines or any banking-related financial services.

**33. Who manages 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

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

Depository

Central Bank

Banks appointed by depository. (please answer 34a)

Neither/others (please answer 34b)

Not applicable

**34a. Please name banks appointed by depository:**

Central Bank for T2S EUR settlement, Depository instructs SEB for USD settlement. Central Bank in Iceland for ISK settlement.

Nasdaq CSD operates exclusively as a central securities depository and does not hold a banking license. Consequently, the CSD does not provide cash deposit services, credit lines or any banking-related financial services

**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:**

Range of services provided traditionally by the depository including the keeping of the depository records, the accounts and balances, the performing of the corporate actions, the performing of the clearing and settlement of non T2S eligible securities (settlement of T2S eligible securities is outsourced to T2S from September 2017). Additional services offered by the Depository include services for investment and pension funds, arranging of general shareholder meetings, arranging of payments incurring from shares and debt securities including withholding income tax at source, Information on stock events 2 days in advance and stock events processing in participants' accounts, dividend and interest payments, formation of shareholder/bondholder lists. E-Register (an electronic environment of services for issuers and investors), distribution of information on corporate actions to custodians. The Depository also administers the register of individual accounts of the second pillar of the state pension system since January, 2003. Since 2013 the Depository in Latvia is responsible for accounting and safe-custody of saving notes issued by the State Treasury. Installments and CA payments are distributed through the Central Bank of Iceland.

### 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)

### 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)

**37c. Name of entity:** Banks or brokerage companies acting as Issuer agents allocate funds on clients' accounts. The Depository credit the account of its participants.

### 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 (note: this excludes institutions where you only hold accounts without further system linkage).**

Issuer CSD perspective: Clearstream Banking Frankfurt and Polish CSD (KDPW) are participants of the Depository.

Investor CSD perspective: The Depository acts as a participant at Clearstream Banking (Luxembourg - non-T2S instruments/Frankfurt - T2S instruments).

**39. Are procedures and controls in place to avoid systemic collapse or contamination if one of the depositories and settlement systems should experience business interruptions for whatever reason?**

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

**39a. Please explain:**

**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.)**

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

### **43-1. Is the nominee account concept being recognised in your market?**

- Yes  
 No

### **43-2. If yes, does the depository permit its participants to open accounts in the participant's own nominee name(s)?**

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

### **44. In the event a participant's single or main account is blocked for any reason (e.g., insolvency, penalties, violations, liens),**

**would securities held in any account or accounts on behalf of the participant's clients be accessible:**

**44a. By the participant's clients?**

- Yes (please answer 44b)
- No
- 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:**

Clients' holdings are held separately from the participant's own assets. Clients can transfer their securities portfolios to any other participant (custodian).

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

- Yes (please answer 44e)
- No
- Other (please answer 44f)

**44g. By the participant's creditors?**

- Yes (please answer 44h)
- No
- Other (please answer 44i)

**44j. By the depository's creditors?**

- Yes (please answer 44k)
- No
- Other (please answer 44l)

**45. In what form does the depository maintain records identifying the assets of each participant? (Choose all that apply. Please "hover" over the below multi-select responses for clarification.)**

- Computer file (please answer 45b)
- Hard copy (please answer 45b)
- Other (please answer 45a)

**45a. If other, please explain:**

Records identifying the assets of each participant are maintained via CSD Core system.

**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.**

Real time  Quarterly

Daily  Annually

Weekly  Upon request

Monthly  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  7 years

1 year  10 Years

3 years  Other (please answer 47a)

5 years

**47a. If other, please explain:**

The policies and procedures of the Depository are designed to ensure that all record keeping requirements under the CSDR and relevant national laws compliant with CSDR article 29.

**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)

Not applicable

Model 2 - Gross Settlements of Securities Transfers Followed by Net Settlement of Funds Transfers. (please answer 48a)  Other (please answer 48b)

Model 3 - Simultaneous Net Settlement of Securities and Funds Transfers. (please answer 48a)

**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)?**

Settlement is performed through the Central Bank of Iceland in three segregated settlement batches to participants sub-accounts in The Central Bank.

**48b. If other, please explain:**

Settlement of the Latvian, Estonian and Lithuanian securities is outsourced to T2S.

**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 (i.e. immediately with no time gap)?**

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

Entity Name

Latvia Nasdaq CSD SE

## **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)

### **52a. Are the securities held: (Choose all that apply.)**

- Through book-entry at the depository
- Through book-entry at a registrar or issuer (please answer 52b)
- Other (please answer 52k)

### **52b. Please identify which types of entities may act as registrars: (Choose all that apply.)**

- Issuers
- Separate companies that perform registrar functions
- Depository
- Other (please answer 52c)

### **52c. Please explain:**

Brokerage firms and specialised brokerage divisions of banks for securities of non-public companies, investment funds and other instruments that are not registered for public distribution in Lithuania.

### **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:**

Estonia: Securities can be registered only at the Depository. The Depository provides centralised function of recording ownership. In Lithuania expectation applies for non public companies (issuer agents may act as a registrar).

**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:**

Transfer of securities are authenticated by banks (the participants of the Depository). Reconciliation and confirmation operations apply.

**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.) (Choose all that apply.)**

- Yes, for proprietary accounts (please answer 55a)
- Yes, for client designated accounts (Please answer 55b)
- No, liens are not applied

**55c. Please describe highlighting any difference in approach between proprietary and client designated accounts.**

**55d. Please indicate the limits of this lien as indicated below: (Choose all that apply.)**

- Liens are limited to securities in the course of purchase and sale transactions, but do not extend to settled positions.
- Clients fully settled positions are protected from placement of Liens other than where there is a court order.
- Other (please answer 55g)

**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)

**55g. Please explain:**

**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)

**56b. Please describe:**

When the corresponding entry (securities transfer: debit of seller`s securities account and credit on buyer`s securities account) is made with the registry.

Except for Iceland, the Depository outsources the validation, matching and settlement of all the Transfer Orders in T2S eligible securities to T2S. The instructions concerning T2S eligible securities, settlement services and other T2S services are provided in T2S Platform pursuant to T2S Rules.

**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:**

Estonia: Initial registration is based upon application (including information about the owners and their securities accounts numbers) submitted by the issuer.

Latvia: Securities can be deposited with the Depository by signing an agreement on recording the issue of financial instruments in the Depository.

Lithuania: When new securities issue is registered by the issuer, the issuer's agent files all the necessary documents on the new securities issue to the Depository.

In Iceland equities are registered in the name of the shareholder in accordance with the sharebook on the dematerialization date. Other securities are registered in the name of the owner by the participants. The Depository opens the Distribution Account and the accounts for the account managers, who are holding the securities of this particular issue in a dematerialized form.

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

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

**58a. Please explain:**

The securities are lodged in a participant's depository account upon processing of the application submitted by the issuer or issuer agent.

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

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

Other (please answer 59b)

**59b. If other, please explain:**

The Depository shall decide whether to initially record and admit securities to the Settlement System specified by the Issuer upon a standard application form at the latest within three months, unless shorter deadline is provided by applicable law.

**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)

**60c. If they cannot be traded, or if you answered other, please explain:**

Latvia: The securities can be traded only after the process of lodging securities into the depository is finished. The Depository and Nasdaq Riga stock exchange agree on the date when the trade with registered securities can be started. Lithuania: Securities of public companies, Government securities and other securities eligible for Depository do not legally exist unless they are lodged into the Depository on participant's account.

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

Latvia: The securities can be settled only after the process of lodging of securities into the depository is finished. Lithuania: Securities of public companies, Government securities and other securities eligible for Depository do not legally exist unless they are lodged into the Depository on participant's account.

**60e. If ownership cannot be transferred, or if you answered other, please explain:**

Latvia: Only when the process of lodging securities into the depository is finished. Lithuania: Securities of public companies, Government securities and other securities eligible for Depository do not legally exist unless they are lodged into the Depository on participant's account.

**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.

By way of automatic data processing and thanks to well developed infrastructure we are of the opinion that eligible securities held at the depository are handled at least as efficiently as compared to securities held outside the Depository, including in relation to income, corporate actions and proxy services. Public limited liability companies cannot be held outside the Depository in Lithuania. In Latvia the Depository performs the registering and accounting of public as well as non-public financial instruments. The Law on the Financial Instruments Market stipulates that all financial instruments that are in public circulation are supposed to be on the books of the Depository. In case of any corporate action (dividend payments, other cash proceeds, takeovers, rights issues etc.) the main principle of information flow are as follows: the Issuer informs the Depository about the upcoming corporate action; The Depository is obliged to forward the information to its respective participants and linked depositories (if applicable). Participants, their clients, each at its respective level towards its own clients, should forward the information to the end investor.

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

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

### 63a. Please specify:

Estonia: According to the law the withdrawal of securities from the depository is allowed only in limited cases: 1) when the issuer is dissolved; 2) debt obligations - only after redemption; 3) shares of the joint stock company - only in case of transformation of the company; 4) shares of the private limited company are allowed to be withdrawn anytime.

Latvia: The Depository shall cancel financial instruments issued in Latvia without determined term in the characteristics of such financial instruments, upon receipt of a request of the Issuer's application. The Issuer shall enclose, to its application on cancellation of financial instruments, documents certifying that cancellation of financial instruments is made in compliance with the agreement on recording the issue of financial instruments in the Depository. The Depository shall be entitled to cancel financial instruments without an Issuer's application if the Depository has received information about liquidation of the issuer or instruction of the Bank of Latvia of the need for cancellation of financial instruments The Board shall make a decision on cancelation of financial instruments without determined date of cancellation in their characteristics within 5 business days from the issuer's application, information about liquidation of the issuer or instruction of the Bank of Latvia, by stating the date of cancellation of financial instruments in the decision. Depository also sets the date on which the full list of shareholders is compiled and hands over the full list of shareholders to the issuer.

Lithuania: Entries in the accounts are deleted from the depository system after the public company has been liquidated, has changed its status to private company, or other CA takes place from the issuer side (closing of the issue due to merger or takeover with/by the other company).

Iceland: Issuer can request the CSD to deregister equities approved by the Annual General Meeting and Fixed income approval from the bond holders is needed.

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

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

### 64b. If other, please explain:

As a standard practice it may take from 1 day up to 1 week, however in some of the cases removal of securities from the Depository can be executed within 60 days.

Iceland: Information about the removal must be published in the Icelandic Legal Gazette with at least 4 weeks notice.

### 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)

### 65b. Please explain:

Estonia: Except if security as financial instrument still exists after de-registration.

Latvia: the Depository sets the date after which the securities can not be traded and informs about it all the participants of the Depository.

Lithuania: No other type of change of ownership is allowed when the public company is in the process of liquidation, is changing its status to private company, or other CA takes place from the issuer side (closing of the issue due to merger or takeover with/by the other company).

Iceland: No.

### 65c. Be settled?

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

### 65d. Please explain:

Estonia: Except if security as financial instrument still exists after de-registration.

Latvia: the Depository sets the date after which the securities can not be traded and informs about it all the participants of the Depository.

Lithuania: No other type of change of ownership is allowed when the public company is in the process of liquidation, is changing its status to private company, or other CA takes place from the issuer side (closing of the issue due to merger or takeover with/by the other company).

### 65e. Have ownership transferred?

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

### 65f. Please explain:

Estonia: Except if security as financial instrument still exists after de-registration.

Latvia: the Depository sets the date after which the securities can not be traded and informs about it all the participants of the Depository.

Lithuania: No other type of change of ownership is allowed when the public company is in the process of liquidation, is changing its status to private company, or other CA takes place from the issuer side (closing of the issue due to merger or takeover with/by the other company).

## 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:**

The Depository is only liable for any damage, loss or expenses of any kind or nature ("Liabilities") resulting from its negligence, fraud or wilful misconduct.

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

**67a. Indemnification**

- Yes (please answer 67b)
- No
- Other (please answer 67b)
- Not applicable

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

Please see Nasdaq CSD Rulebook, section 2.11 [<https://nasdaqcsd.com/rules-regulations-and-compliance/>]

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

**67d. Insurance**

- Yes (please answer 67e)
- No
- Other (please answer 67e)
- Not applicable

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

Maintaining of insurance is a matter of laws and good business practices as well as NASDAQ Group insurance policy for Financial loss and liability.

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

**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):**

Liabilities are acknowledged within the limits laid down in insurance policy.

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

**67j. Other**

- Yes (please answer 67k)
- No

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

- Yes
- No
- Other (please answer 68a)

### **Security Control**

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

- By direct electronic link
- By receipt of physical account holding statements
- Other (please answer 69a)
- Not applicable

**69a. Please explain:**

The participants of the Depository receive information (view actual settlement of trades, movement of securities on their accounts, etc.) and see the status of their account via the Core CSD system's GUI or (and) messaging.

Entity Name

Latvia Nasdaq CSD SE

**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)

**70c. Please explain:**

The participants of the Depository have access to affect their holdings, including confirming and affirming trades, movement of securities on their accounts via the CSD Core system's GUI and (or) messaging.

**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?**

90 days

**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?** 5 attempts.

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

- Yes (please answer 72a)
- No (please proceed to 74)
- Not applicable (please proceed to 74)
- Other (please answer 72a)

**72a. Please explain:**

Encrypted data exchange with trading system and communication with the central banks' payment systems via SWIFT. In addition the Depository has communication with the local pensions registry and Commercial Registry (in Estonia) and foreign Depositories.

**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 and by whom is the loss covered? (Choose all that apply?)**

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

**76d. Please explain:**

N/A

**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)

**77a. How was the situation resolved? Or if you answered "Other," then please explain:**

Iceland: Participants' exposure is directly with each other, and CSD is not obligated to monitor exposure of each participant. The Icelandic FSA reviews participants on a regular basis and if a participant does not have financial strength to meet its obligation its business is terminated immediately. For the past seven years no participant has become insolvent.

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

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

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

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

**78g. If other, please explain:**

Iceland: According to Art. 21-23 Act.7/2020 " When the cause of a loss can be traced to the activities of a central securities depository or account operator, in accordance with Articles 21 and 23, but it is not clear which of the two parties is responsible for the loss, they may be sued for damages jointly (in solidum). Right of recourse between the plaintiffs shall be subject to the general rules of law. The total guarantee fund of a central securities depository shall never amount to less than ISK 700 million in the form of guarantees or other arrangements" Nasdaq CSD Iceland has Professional Liability Insurance to cover loss in its operation.

**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)

**78l. If other, please explain:**

Iceland: According to Art. 21-23 Act.7/2020 " When the cause of a loss can be traced to the activities of a central securities depository or account operator, in accordance with Articles 21 and 23, but it is not clear which of the two parties is responsible for the loss, they may be sued for damages jointly (in solidum). Right of recourse between the plaintiffs shall be subject to the general rules of law. The total guarantee fund of a central securities depository shall never amount to less than ISK 700 million in the form of guarantees or other arrangements" Nasdaq CSD Iceland has Professional Liability Insurance to cover loss in its operation.

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

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

**79-2: Please provide the risk management framework (attachment, link etc.)**

**URL Link:**

**79a. Please explain other loss or default protections:**

Iceland: In accordance with laws on financial institutions.

**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)

**79h. Please identify and explain:**

Settlement is outsourced to T2S platform. The Depository monitors securities' part.

**79i. Please explain briefly how these work:**

The Depository follows internal procedural layers such as sanctions screening as required by applicable law.

**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 operations facility
- Digital/electronic signing of documentation
- Off-site data storage
- Remote working ability
- Other (please answer 81h)
- Back-up files stored and locked

**81b-1. Please identify the frequency of testing for the following third party:**

**- Depository participants/members**

Annually

**81b-2. Please identify the last date of testing for the following third party:**

**- Depository participants/members**

September 2025

**81c-1. Please identify the frequency of testing for the following third party:**

**- Stock exchange**

Annually

**81c-2. Please identify the last date of testing for the following third party:**

**- Stock exchange**

August 2025

**81d-1. Please identify the frequency of testing for the following third party:**

**- Central bank**

Annually

**81d-2. Please identify the last date of testing for the following third party:**

**- Central bank**

March 2025

**81e-1. Please identify the frequency of testing for the following third party:**

**- Local brokers**

n/a

**81e-2. Please identify the last date of testing for the following third party:**

**- Local brokers**

**81f-1. Please identify the frequency of testing for the following third party:**

**- Any other third party**

n/a

**81f-2. Please identify 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  Longer than 24 hours

4 - 8 hours  Not applicable

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

**84. Will the depository publicly announce any system interruption?**

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

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

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

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

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

**84f. Please explain:**

Depending on system interruption, different communication channels might be chosen.

**84g. If other, please explain:**

Decision would vary depending on the situation.

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

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

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

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

## 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)

### 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. Please confirm whether you maintain insurance policies to cover any liabilities and indemnities that you may incur in connection to the services you provide.

- No insurance
- Insurance to cover losses in the event of Default on settlement commitments by the depository or a participant (please answer 91a)
-

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) (please answer 91b)

Insurance for Operational Errors and Error & Omissions (please answer 91c)

Insurance for the Premises (please answer 91d)

Other type of insurance (please answer 91e)

**91a. What is the amount of the coverage and the amount of deductible? Please also indicate the currency.**

Nasdaq CSD is covered by global insurance policy of Nasdaq Group. Nasdaq CSD treats insurance coverage strictly confidential and does not communicate any limits, deductibles or coverage in detail.

**91b. What is the amount of the coverage and the amount of deductible? Please also indicate the currency.**

Nasdaq CSD is covered by global insurance policy of Nasdaq Group. Nasdaq CSD treats insurance coverage strictly confidential and does not communicate any limits, deductibles or coverage in detail.

**91c. What is the amount of the coverage and the amount of deductible? Please also indicate the currency.**

Nasdaq CSD is covered by global insurance policy of Nasdaq Group. Nasdaq CSD treats insurance coverage strictly confidential and does not communicate any limits, deductibles or coverage in detail.

**91d. What is the amount of the coverage and the amount of deductible? Please also indicate the currency.**

Nasdaq CSD is covered by global insurance policy of Nasdaq Group. Nasdaq CSD treats insurance coverage strictly confidential and does not communicate any limits, deductibles or coverage in detail.

**92. This question was deleted during the 2025-2026 Project.**

**92a - 92c. These questions were deleted during the 2025-2026 Project.**

**93. This question was deleted during the 2025-2026 Project.**

**93a - 93c. These questions were deleted during the 2025-2026 Project.**

**94. This question was deleted during the 2025-2026 Project.**

**94a - 94c. These questions were deleted during the 2025-2026 Project.**

**95. This question was deleted during the 2025-2026 Project.**

**95a - 95c. These questions were deleted during the 2025-2026 Project.**

**96. This question was deleted during the 2025-2026 Project.**

**96a - 96d. These questions were deleted during the 2025-2026 Project.**

**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.**

Nasdaq CSD is covered by global insurance policy of Nasdaq Group. Nasdaq CSD treats insurance coverage strictly confidential and does not communicate any limits, deductibles or coverage in detail.

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

Nasdaq CSD is covered by global insurance policy of Nasdaq Group. Nasdaq CSD treats insurance coverage strictly confidential and does not communicate any limits, deductibles or coverage in detail.

**97b. What is the term of the policy?**

June 1, 2026

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

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

**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:**

**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? (Please "hover" over the below multi-select responses for additional guidance.)**

- 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.nasdaqcsd.com

**99c. Please provide name of contact at depository who has been designated to receive such requests (then please answer 99d).**

Mr. Raitis Vancans, Mrs. Thora Smith

**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)

**99h. What is the preferred e-mail address for such requests:**

csd@nasdaq.com

**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:**

Nasdaq CSD is covered by global cybersecurity policy of Nasdaq Group.

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

Yes

No

**Comments:**

**103. Please confirm what topics are covered by your policy for continuity of business in the event of a large data breach or cyber attack against your organization.**

- IT Asset & Inventory Management
- IT Protective Security Technology
- Cyber Event Detection
- Architecture Management
- Access Management
- Incident Response and Recovery
- Change Management
- Logging, Monitoring, and Alerting
- Other (Please add comments)
- Security Awareness & Training

**Comments:**

Nasdaq CSD is covered by global cybersecurity policy of Nasdaq Group.

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

Yes

No

**Comments:**

Editorial changes

**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:**

Nasdaq CSD is covered by global cybersecurity policy of Nasdaq Group.

**107. How does your organization identify cyber risks to business functions?**

Enterprise Risk Management Framework  Risk and Control Assessments

External Reviews  Other (Please add comments)

**Comments:**

**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:**

External penetration tests are conducted, at least, every 3 years. Internal - on annual basis.

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

- Encryption of data at rest
- Intrusion detection systems
- Patch Management
- Encryption of data in transit
- Intrusion prevention systems
- User Access Controls
- Anti-virus software
- Firewalls
- Other (Please add comments)
- Aniti-malwear software

**Comments:**

**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
- Not applicable as no outsourcing

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

- Incident Response Plan
- Searching for user login patterns
- Logging of IT systems
- Other (please answer 112a)
- Searching for network traffic patterns

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

- 1 - 4 hours
- 8 - 24 hours
- Other (please answer 113a)
- 4 - 8 hours
- Longer than 24 hours

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

- By e-mail
- Public announcement
- Other (please answer 114a)
- By telephone
- Press release

**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:**

**116a. Are the following elements of your cybersecurity framework tested pre deployment of changes?**

- Vulnerability
- Scenario based penetration tests
- Testing of incident response process and technical/business/operations (e.g. table-top exercise)

**116b. Are the following elements of your cybersecurity framework tested post deployment of changes?**

- Vulnerability
- Scenario based penetration tests
- Testing of incident response process and technical/business/operations (e.g. table-top exercise)

**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
- Not applicable as cloud not used

**118. Does your organisation have a cyber threat intelligence programme to understand and protect against a potential threat actor's motives, targets, and attack behaviors?**

- 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:**

**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.**