

**WFC Single Disclosure Report 2025**

**AGC and PFMI answers**

Date submitted
08/01/2026 10:18:04

**General information**

<p>G01Q001 Please indicate the full name of the responding institution:</p>
<p>PFMI: Annex A - CSD disclosure template [CSD name]AGC: 0a</p>
<p>Legal Name: INTERBOLSA - Sociedade Gestora de Sistemas de Liquidação e de Sistemas Centralizados de Valores Mobiliários, S. A (hereinafter referred in this document as Euronext Securities Porto)</p>

<p>G01Q002 Registered address:</p>
<p>PFMI: n/aAGC: 0c</p>
<p>Rua Anibal Cunha 218 4050-047 Porto Portugal</p>

<p>G01Q003 Country of registered address:</p>
<p>PFMI: n/a AGC: 0d</p>
<p>Portugal</p>

<p>G01Q004 Official website of the respondent institution:</p>
<p>PFMI: Annex A - CSD disclosure template [website]AGC: n/a</p>
<p>Porto   euronext.com</p>

<p>G01Q005 The date of this disclosure is:</p>
<p>PFMI: Annex A - CSD disclosure template [date]AGC: n/a</p>
<p>01/01/2026</p>

<p>G01Q006 The WFC, the AGC, CPMI and IOSCO encourage respondents to make their disclosure reports publicly available. Do you agree to make your response publicly available?</p>
<p>PFMI: n/a AGC: 99</p>
<p><input checked="" type="radio"/> Yes, my full response will be publicly available. I agree that my response can be published on the website of the WFC and on the website of the regional CSD association(s) which my CSD is a member of.</p> <p><input type="radio"/> Yes, my response will be public, but only for my answers to AGC questions.</p> <p><input type="radio"/> Yes, my response will be public, but only for my answers to PFMI questions.</p> <p><input type="radio"/> No, I do not wish my response to be publicly available.</p>

<p>G01Q007 How will you be making your answers publicly available?</p>
<p>PFMI: n/a AGC: 99a</p>
<p><input checked="" type="checkbox"/> Website</p> <p><input type="checkbox"/> Upon request</p> <p><input type="checkbox"/> OTHER:</p>

G01Q008

This disclosure can also be found at the following web address(es):

PFMI: Annex A - CSD disclosure template [website URL]AGC: 99b

File repository | Euronext Securities Porto

G01Q009

First and Last Name of the contact person:

PFMI: Annex A - CSD disclosure template [contact details]AGC: 99c

Arlinda Moreira

G01Q010

Email address of the contact person:

PFMI: Annex A - CSD disclosure template [contact details]AGC: 99h

I hereby certify that I am authorised to submit this disclosure report on behalf of my institution.  
amoreira@euronext.com

G01Q011

Telephone number (please include the international country code):

PFMI: n/a AGC: 99e

+351 221 208 006

G01Q012

How do you prefer to be contacted?

PFMI: n/aAGC: 99d

- Telephone  
 Fax  
 mail/air courier  
 e-mail

G01Q013

Fax number

PFMI: n/aAGC: 99f

N/A

G01Q014

What is the preferred street address for mailing requests?

PFMI: n/aAGC: 99g

Rua Anibal Cunha, 218  
4050-047 Porto  
Portugal

G01Q015

Please list the jurisdiction(s) in which the CSD operates:

PFMI: Annex A - CSD disclosure template [list jurisdictions]AGC: n/a

Portugal

G01Q016

Please list the authority(ies) regulating, supervising or overseeing the CSD:

PFMI: Annex A - CSD disclosure template [list authorities]AGC: n/a

National Competent Authority: CMVM - Comissão do Mercado de Valores Mobiliários (The Portuguese Securities Market Commission) Relevant Authority – Banco de Portugal

G01Q017

Executive summary (This section should summarise the key points from the disclosure framework, including a brief overview of the CSD, its participants, its legal and regulatory framework, its primary risks, and its key risk management and other relevant practices.)

PFMI: I.AGC: n/a

INTERBOLSA - Sociedade Gestora de Sistemas de Liquidação e de Sistemas Centralizados de Valores Mobiliários, S.A. (hereinafter as Euronext Securities Porto) is a Central Securities Depositories authorised under Regulation (EU) 909/2014, of 23 July (the CSD Regulation).

Euronext Securities Porto is a wholly owned subsidiary of Euronext Lisbon – Sociedade Gestora de Mercados Regulamentados, S.A. and, therefore, part of the Euronext Group.

Euronext Securities Porto and its activity are specifically governed by the Regulation (EU) 909/2014 of 23 July (the CSD Regulation), the Portuguese legal framework for CSDs, approved by Law 35/2018, of 20 July, the Portuguese Securities Code, the Portuguese Corporate Code, CMVM Regulations, namely CMVM Regulations 5/2018 (CSD's), 14/2000 ("Securities Registration Systems"), and 5/2007 ("Clearing, Central Counterparty and Settlement"), its own Regulations and Interbolsa's by-laws.

Euronext Securities Porto's national competent authority is CMVM – Comissão do Mercado de Valores Mobiliários, the Portuguese Securities Market Commission, which regulates and supervises Euronext Securities Porto.

Euronext Securities Porto is subject to both prudential (focused on financial health and solvency, including systemic risk) and market conduct (focused on the relationship with clients and market agents) supervision of the CMVM.

Euronext Securities Porto relevant authority is Banco de Portugal.

Within the limits of the law and regulations, Euronext Securities Porto, as a CSD, regulates the activities of those systems, issuing operational rules (which are all available in Euronext Securities Porto's website at [Porto | euronext.com](http://Porto.euronext.com)). The operational rules issued by Euronext Securities Porto have to be notified in advance to the CMVM.

The objectives of Euronext Securities Porto are:

- \* To provide infrastructures and highest quality services to all participants of the securities market, namely to the financial intermediaries and issuer companies, that will fulfill all the needs of the market with efficiency, safety and confidence;
- \* To render services for settlement, issue registration, deposit and safekeeping of securities according to the best international practices;
- \* To follow a strategy focused on the continuous improvement of its products and services according to the customers' needs;
- \* To engage continuously with rigor and professionalism in the development and efficiency of the capital market, namely in what concerns the areas of settlement and custody;
- \* To contribute to the development of the capital market by creating competitive conditions, reducing systemic risks and protecting the rights of the investors and other entities involved with the capital market.

In accordance with its corporate object and as required by the CSD Regulation, Euronext Securities Porto carries out a wide range of activities, concentrated in the following main areas:

CORE SERVICES:

- \* Initial recording of securities in a book-entry system (Notary services)
- \* Structuring and managing a Centralised Securities System (Central Maintenance Services)
- \* Management of Securities Settlement Systems (Settlement Services)

NON-BANKING TYPE ANCILLARY SERVICES, mainly:

- \* Assignment and management of ISIN/CFI/ISIN codes as National Number Agency
- \* Management of a Securities Lending Management System (SGE)
- \* Management of an Investment Funds System (SFI)

In general:

- \* Euronext Securities Porto operates a reliable, effective, low risk and efficient centralised securities systems and securities settlement systems.
- \* Euronext Securities Porto has clear and transparent rules and procedures in place to operate its systems, support the needs of the financial system and to monitor, manage and minimise the risks involved.
- \* A clear business continuity plan exists and is tested annually internally and externally.
- \* Euronext Securities Porto's management is strongly committed to maintain a very low risk profile for the activities of Euronext Securities Porto as Centralised Securities Depository (CSD) and as Securities Settlement System (SSS).
- \* The activities of Euronext Securities Porto have a sound legal basis and adequate governance arrangements.

G01Q018

Summary of major changes since the last update of the disclosure (This section should summarise the major changes to the CSD's organisation, services, design, rules, markets served and regulatory environment since its last disclosure. The CSD should note the sections in its disclosure where such changes are reflected.)

PFMI: II.AGC: n/a

In April 2024 Euronext Securities Porto also launched a new platform of Corporate Events to the Portuguese market for debt instruments.

The second phase of this project (scheduled for January 2026) will include in this new platform all other securities registered in the CSD.

The platform will meet market needs for efficient, consistent, and harmonised processes across markets and supporting more automated Corporate Actions(CA) processing ensuring compliance with CA standards, including SCoRE and supporting eligibility in the Eurosystem.

G01Q019

General description of the CSD and the markets it serves (This section should provide basic, concise descriptions of the services offered and functions performed by the CSD? It should also provide an overview of the markets the CSD serves and the role it fulfils within those markets. Further, the section should include basic data and performance statistics on its services and operations. A CSD should provide, for example, basic volume and value statistics by product type, average aggregate intraday exposures of the CSD to its participants, and statistics on the CSD's operational reliability.)

PFMI: III.1.AGC: n/a

In accordance with its corporate object and as required by the CSD Regulation, Euronext Securities Porto carries out a wide range of activities, concentrated in the following main areas:

**CORE SERVICES:**

- \* [Initial recording of securities in a book-entry system](#)
- \* Structuring and managing of a [Centralised Securities System](#)
- \* Management of [Securities Settlement Systems](#)

Explanation:

**A. Initial recording of securities in a book-entry system and Structuring and managing of a Centralised Securities System**

With respect of the **initial registration of securities and the structuring and administration of centralised securities systems** (the Centralised System of Securities or Centralised System), Euronext Securities Porto carries out the following functions:

- \* Registration of securities issues represented in book-entry form and the implementation of the related controls;
- \* Registration of physical securities issues (securities in certificate form), their safekeeping and the implementation of the related controls;
- \* Registration of positions held by Participants in the accounts opened in the centralised systems, which are reflected in the TARGET2-Securities (T2S) platform;
- \* Ensuring the adequate procedures to the exercise of patrimonial rights inherent to the securities registered in its systems, namely changes in the company's share capital, payment of income and redemption.

Issuers, Financial Intermediaries and other entities which, under the terms of the law and the regulations in force, may assume the status of affiliates (custodians), Banco de Portugal and even Euronext Securities Porto, as the controlling entity, participate on the Centralised System.

The Centralised System is composed by an interconnected set of accounts, through which the securities are created and transferred and the control of the quantity of the securities issued and in circulation and of the rights that exist over them.

The main accounts in the Centralised System are the following:

- \* The issue management account opened by each of the Issuers in the Centralised System (which includes some of the data from the issuing account already opened at the Issuer);
- \* The global accounts opened by the Financial Intermediaries in the Centralised System which are reflected in the TARGET2-Securities (T2S) platform. These global accounts correspond, on every moment, to the sum of the individual registry accounts, opened in the name of the investors, in the chosen Financial Intermediary (depository/registrar) chosen by them.

The Financial Intermediaries are entirely responsible for the maintenance and movement of the securities in the individual registry accounts opened in their books, as well as in the global accounts opened in the Centralised System, under the terms of the law and regulations in force, namely the Securities Code, CMVM's Regulation 14/2000 and Interbolsa's Regulation 2/2016.

The Centralised Securities System carries out all the necessary procedures to ensure the exercising of the patrimonial rights, concerning the securities registered in its system.

Euronext Securities Porto, in a perfectly integrated way, together with the Centralised Systems mentioned, also organizes and manages Securities Settlement Systems.

**B. Management of Securities Settlement Systems**

Euronext Securities Porto is responsible for the organization and management of **Securities Settlement Systems** in order to ensure, namely, the transfers of money associated with the transfers of securities or inherent rights and guarantees regarding operations over securities. Since March 2016, Euronext Securities Porto, as a Central Securities Depository (CSD), participates in the TARGET2-Securities (T2S) platform for the provision of securities settlement services to its Participants in central bank money.

Therefore, the Securities Settlement Systems managed by Euronext Securities Porto allow for the:

- \* Settlement of transactions executed in regulated markets, multilateral trading facilities (MTFs) and organised trading facilities (OTFs);
- \* Settlement of over-the-counter (OTC) transactions;
- \* Settlement of transactions in the framework of securities lending transactions through SGE – Sistema de Gestão de Empréstimos, the securities lending management system made available by Euronext Securities Porto to its Participants;
- \* Settlement of free-of-payment (FOP) transfers;
- \* Financial settlement regarding the exercise of rights inherent to the securities registered or deposited in the Central Securities Depository;
- \* Processing of the corresponding financial settlement in the cash accounts of the Participants opened in the T2S platform, for payments in euros and sending of the payment instructions to Caixa Geral de Depósitos - Sistema de Pagamentos em Moeda Estrangeira (SPME – Non-Euro Payment System) for payment in other currencies different from euro.

The Participants in the Securities Settlement Systems are the Financial Intermediaries affiliated to Euronext Securities Porto systems and other entities that, under the terms of the law and the regulations in force, may assume the status of affiliated, which ensure the physical and financial settlement of transactions carried out on a regulated market, in multilateral trading system and organised trading facilities, as well as the operations carried out outside the market.

Since March 29, 2016, Euronext Securities Porto provides settlement services through the Eurosystem's settlement platform, TARGET2-Securities (T2S) for euros. It should also be noted that payments in currencies other than euro, not accepted by the T2S platform, are processed through a commercial bank, the SPME - Non-Euro Payment System, operated by Caixa Geral de Depósitos.

More information and statistics on Euronext Securities Porto's services and operations can be consulted in Euronext Securities Porto's website ([Porto | euronext.com](http://Porto.euronext.com)).

**NON BANKING TYPE ANCILLARY SERVICES, mainly:**

- \* Assignment and management of ISIN/CFI/FISIN codes as National Number Agency
- \* Management of a Securities Lending Management System (SGE)
- \* Management of an Investment Funds System (SFI)

More information and statistics on Euronext Securities Porto's services and operations can be consulted in Euronext Securities Porto's website ([Porto | euronext.com](http://Porto.euronext.com))

G01Q020

General organisation of the CSD (This section should provide an overview of the organisational and governance structure of the CSD? including a description of the CSD's governance policies, governance structure and management structure.)

PFMI: III.2AGC: n/a

Euronext Securities Porto is incorporated under Portuguese Law, and is a wholly-owned subsidiary of Euronext Lisbon – Sociedade Gestora de Mercados Regulamentados, S.A.. Euronext Securities Porto and Euronext Lisbon are part of the Euronext Group.

Euronext Securities Porto's corporate bodies are the General Meeting, the Board of Directors and the Sole Auditor.

The composition of the corporate bodies has to be communicated to CMVM that can oppose to the designation based on good reputation and experience arguments.

The composition of the board is determined by the General Meeting, in the terms established in the by-laws and in the Portuguese Corporate Code. The members designed by the General Meeting are subject to registration within CMVM.

According to the Portuguese law, only those persons who, considering their fitness and professional experience, guarantee that management will be undertaken according with high standards of prudence and efficiency, can become members of the management and supervisory control bodies of Euronext Securities Porto. If in relation to any member of the management and supervisory bodies, the requirement of fitness is no longer met, by a supervening fact or a fact not yet known by CMVM, this entity will notify the managing entity to immediately terminate the functions of the said individuals and, within a pre-established timeframe, promote the respective substitution.

Euronext Securities Porto's internal organization is based on a structure of functional nature established upon a specialization criterion regarding the tasks allocated to the different Departments.

G01Q021

Legal and regulatory framework (This section should provide an overview of the CSD's legal and regulatory framework, including the legal and ownership structure of the CSD, the legal basis for each material aspect of the CSD's activities, and the regulatory, supervisory and oversight framework for the CSD.)

PFMI: III.3AGC: n/a

Interbolsa – Sociedade Gestora de Sistemas de Liquidação e de Sistemas Centralizados de Valores Mobiliários, S.A. (hereinafter referred as Euronext Securities Porto) is a Central Securities Depositories authorised under the CSD Regulation.

Euronext Securities Porto is a wholly owned subsidiary of Euronext Lisbon – Sociedade Gestora de Mercados Regulamentados, S.A. and, therefore, part of the Euronext Group.

Euronext Securities Porto and its activities are specifically governed by the CSD Regulation, the Legal Framework for the CSDs, approved by Law 35/2018, of 20<sup>th</sup> July, the Portuguese Securities Code, the Portuguese Corporate Code, CMVM Regulations, namely CMVM Regulations 5/2018 ("CSD's"), 14/2000 ("Securities Registration Systems"), and 5/2007 ("Clearing, Central Counterparty and Settlement").

Euronext Securities Porto is regulated and supervised by CMVM – Comissão do Mercado de Valores Mobiliários (its competente authority).

Banco de Portugal is Euronext Securities Porto's relevant authority.

G01Q022

System design and operations (This section should explain the CSD's design and operations. It should include a clear description of the typical lifecycle of the transaction process. The information should highlight how the CSD processes a transaction, including the timeline of events, the validation and checks to which a transaction is subjected, and the responsibilities of the parties involved.)

PFMI: III.4AGC: n/a

#### - Centralised Securities Systems -

Registry and control of securities in book-entry form (in materialised/immobilised and dematerialised form)

According to the Portuguese Securities Code and to article 3 of the CSDR, securities can be dematerialised or represented by paper form, and it is mandatory the record of those securities in a CSD, in book-entry form, for the trading of the same in a regulated market or MTF/OTF. Book-entry form can take the form of immobilization or dematerialization. Euronext Securities Porto maintains vaults for the safekeeping of securities in physical form. Those securities are represented by book-entry records and transfers are made by book-entry.

The securities registry in the Centralised Securities Systems managed by Euronext Securities Porto must be requested by the Issuer. The request for the registry of securities in the Central Securities Depository must be accompanied by the documents/information that will characterize/describe the issuer and the securities.

Euronext Securities Porto provides corporate actions processing services to the issuer entities that have their securities integrated in the centralised system managed by Euronext Securities Porto and to the participants that hold those same securities in their securities accounts.

#### - Securities Settlement Systems -

Euronext Securities Porto is responsible for the organization and management of Securities Settlement Systems in order to ensure, namely, the cash transfers associated with the transfers of securities or inherent rights and with guarantees regarding operations over securities.

Since March 2016, Euronext Securities Porto, as a CSD, participates in the T2S platform for the provision of securities settlement services to its participants in central bank money for Euro.

G01Q023

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

### Legal Basis (PFMI Principle 1)

G02Q001

Summary narrative for PFMI Principle 1. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P1AGC: n/a

The AGC questions and a report with only AGC answers will be generated

The PFMI questions and a report with only PFMI answers will be generated

Both the AGC and PFMI questions and a report with answers to both questionnaires will be generated

Interbolsa – Sociedade Gestora de Sistemas de Liquidação e de Sistemas Centralizados de Valores Mobiliários, S.A. ( Euronext Securities Porto) is a Central Securities Depositories authorised under the CSD Regulation.

Euronext Securities Porto is a wholly owned subsidiary of Euronext Lisbon – Sociedade Gestora de Mercados Regulamentados, S.A. and, therefore, part of the Euronext Group.

Euronext Securities Porto and its activities are specifically governed by the CSD Regulation, the Portuguese Legal Framework for CSDs, approved by Law 35/2018, of 20<sup>th</sup> July, the Portuguese Securities Code, the Portuguese Corporate Code, the CMVM Regulations, namely CMVM Regulations 5/2018 ("CSD's"), 14/2000 (" Securities Registration Systems"), and 5/2007 (" Clearing, Central Counterparty and Settlement"), its own Regulations and Euronext Securities Porto By-Laws.

Within the limits of the law and regulations, Euronext Securities Porto, as a CSD recognised and authorised under CSD Regulation, regulates the activities of the centralised securities systems and the securities settlement systems managed by Euronext Securities Porto, issuing operational rules (which are all available in Euronext Securities Porto's website at [Porto | euronext.com](http://Porto.euronext.com)). The operational rules issued by Euronext Securities Porto have to be communicated in advance to the CMVM.

Compliance with these operational rules is ascertained and enforced by Euronext Securities Porto, as the managing entity of the systems, but also by the CMVM (in its capacity of supervisory entity of the securities market).

All Euronext Securities Porto's operational rules are available (in Portuguese and English) at Euronext Securities Porto's website [Porto | euronext.com](http://Porto.euronext.com).

G02Q002

Under what regulation or statute is the CSD established and governed?

PFMI: n/aAGC: 7

The functioning of the CSD is defined in the CSD Regulation and in the related Regulatory Technical Standards and Implementing Technical Standards, as well as in the Portuguese legal framework for CSDs approved by Law 35/2018, of 20 July and in CMVM rules. Euronext Securities Porto is also ruled by its By-Laws and the Portuguese Corporate Code.

The systems operated by Euronext Securities Porto are ruled by the Portuguese Securities Code, by the CMVM rules and by Euronext Securities Porto's rules.

G02Q003

Is the regulation or statute electronically available?

PFMI: n/aAGC: 7a

Yes

No

G02Q004

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

PFMI: n/aAGC: 7b

[Management Reports and By-Laws | Euronext Securities Porto](http://Porto.euronext.com)

G02Q005

filecount - Please supply document(s) here:

PFMI: n/aAGC: 7c

G02Q006

What are the material aspects of the CSD's activities that require a high degree of legal certainty (for example, rights and interests in financial instruments, settlement finality, netting, interoperability, immobilisation and dematerialisation of securities, arrangements for DvP, PvP or DvD, collateral arrangements (including margin arrangements), and default procedures)?

PFMI: Q.1.1.1AGC: n/a

The material aspects of Euronext Securities Porto's activity that require a high degree of legal certainty are mainly the issues related to the settlement service, the settlement finality rules, control and dematerialization of securities, corporate actions rules and procedures. All these topics are covered in Interbolsa's rules.

G02Q007

What are the relevant jurisdictions for each material aspect of the CSD's activities?

PFMI: Q.1.1.2AGC: n/a

The relevant jurisdiction where Euronext Securities Porto provides its activity is Portugal.

Nevertheless, Euronext Securities Porto, in the course of its activity, conducts business in different jurisdictions regarding:

- (i) Issuers/Securities;
- (ii) Participants.

G02Q008

How does the CSD ensure that its legal basis (that is, the legal framework and the CSD's rules, procedures and contracts) provides a high degree of legal certainty for each material aspect of the CSD's activities in all relevant jurisdictions? In particular, how does the CSD ensure that its legal basis supports the immobilisation or dematerialisation of securities and the transfer of securities by book entry? In addition, if the CSD has a netting arrangement, how does the CSD ensure that its legal basis supports the enforceability of that arrangement? Where settlement finality occurs in the CSD, how does the CSD ensure that its legal basis supports the finality of transactions, including those of an insolvent participant? Does the legal basis for the external settlement mechanisms the CSD uses, such as funds transfer or securities transfer systems, also support this finality?

PFMI: Q.1.1.3AGC: n/a

The Portuguese securities market is ruled by the Portuguese Securities Code approved by Decree-Law 486/99, of 13th November 1999, as amended, and by CMVM Regulations.

Laws, regulations, rules and procedures, and contractual provisions governing the systems managed by Euronext Securities Porto, are clearly stated, understandable, public and accessible to all system participants. The legal framework is comprehensive, covering all the aspects related to the activity of the settlement systems and gives legal certainty, confidence and security to the participants on those systems.

Interbolsa's regulations are notified in advance to the CMVM, for which gives confidence and security to the applicability of those rules. Euronext Securities Porto rules are publicly disclosed on Euronext Securities Porto's website.

Euronext Securities Porto maintains in its website, duly updated, a set of documentation, such as the company's by-laws, the rules of the Centralised Securities Systems and of the Securities Settlement Systems managed by Euronext Securities Porto, the price list of Euronext Securities Porto and those rules related to the affiliation in (participation access to) Euronext Securities Porto's systems.

Euronext Securities Porto also maintains updated operational manuals of the Centralised Securities Systems and of the Securities Settlement Systems.

Every amendment to the rules or to the operational manuals is communicated to participants by email, or other technical means of communication and disclosed on Euronext Securities Porto's website.

These documents, together with the Portuguese Securities Code and CMVM rules define the rights and obligations of Euronext Securities Porto's participants. Every applicant signs a participation agreement with Euronext Securities Porto accepting the responsibilities due to the participation and by which the applicant seeking to become a participant assures to accept the above-mentioned documents and rules. The rules and procedures will be maintained in force even in the event of insolvency of Euronext Securities Porto's system participants.

Rules and contracts related to the operation of the Securities Settlement System (SSS) are enforceable in the event of the insolvency of a system participant, of a participant in a linked or interoperable system, of the operator of the system, or of the operator of linked or interoperable systems.

Euronext Securities Porto follows all the European and international discussions and changes regarding harmonization of rules and procedures promoting the implementation of the European and international standards that establish the framework of the post-trade industry, and the rules set forth in the CSD Regulation.

G02Q009

How has the CSD demonstrated that its rules, procedures and contracts are clear and understandable?

PFMI: Q.1.2.1AGC: n/a

According to article 43 (1) (2) of Regulation (EU) 909/2014 (CSDR), Euronext Securities Porto has rules, procedures, and contracts that are clear and understandable for all the securities settlement systems that it operates and all other services that it provides.

Euronext Securities Porto designs its rules, procedures and contracts so that they are enforceable in all relevant jurisdictions, including in case of default of a participant.

The Portuguese securities market is ruled by the Portuguese Securities Code approved by Decree-Law 486/99, of 13th November 1999, as amended, and by the Portuguese Corporate Code. Laws, regulations, rules and procedures, and contractual provisions governing the systems managed by Euronext Securities Porto are clearly stated, understandable, public and accessible to all system participants.

The legal framework is comprehensive, covering all the aspects related to the activity of the securities settlement systems and centralised securities systems and gives legal certainty, confidence and security to the participants on those systems.

Euronext Securities Porto's regulations are notified to the CMVM which gives confidence and security to the applicability of those rules, and are publicly disclosed in Euronext Securities Porto's website.

Euronext Securities Porto maintains in its website, duly updated, a set of documentation that includes the company's by-laws, the rules of the Centralised Securities Systems and of the Securities Settlement Systems managed by Euronext Securities Porto, the fee books of Euronext Securities Porto (both for issuers and financial intermediaries) and those related to the participation in its systems, notices and explanatory texts regarding the functioning of the systems and services managed by Euronext Securities Porto.

Every amendment to the rules or to the operational manuals is communicated to participants by email, or other technical means of communication and disclosed in Euronext Securities Porto's website.

These documents, together with the Portuguese Securities Code and the CMVM rules, define the rights and obligations of Euronext Securities Porto's participants. Every applicant signs a participation agreement with Euronext Securities Porto accepting the responsibilities due to the participation and by which the entity seeking to become a participant assures to accept the above mentioned documents and rules. The rules and procedures will be maintained in force even in the event of insolvency of Euronext Securities Porto's systems participants.

Euronext Securities Porto also maintains updated, operational manuals of the services provided.

The rules and contracts related to the operation of the Securities Settlement System (SSS) are enforceable in the event of the insolvency of a system participant, of a participant in a linked or interoperable system, of the operator of the system, or of the operator of linked or interoperable systems. Article 41 (a) of the Portuguese Securities Code expressly establishes that the law of the State where the management entity of the centralised securities is located governs the transfer of rights and the creation of security on securities integrated into that system.

G02Q010

How does the CSD ensure that its rules, procedures and contracts are consistent with relevant laws and regulations (for example, through legal opinions or analyses)? Have any inconsistencies been identified and remedied?

PFMI: Q.1.2.2AGC: n/a

Euronext Securities Porto's rules are notified in advance to the CMVM which gives confidence and security to the applicability of those rules, which are publicly disclosed in Euronext Securities Porto's website. No inconsistencies were ever detected.

G02Q011

Are the CSD's rules, procedures and contracts reviewed or assessed by external authorities or entities?

PFMI: Q.1.2.2AGC: n/a

Yes. By the Euronext Securities Porto's National Competent Authority: CMVM – Comissão do Mercado de Valores Mobiliários

G02Q012

Do the CSD's rules, procedures and contracts have to be approved before coming into effect? If so, by whom and how?

PFMI: Q.1.2.3AGC: n/a

No. Nevertheless, they need to be notified in advance to the CMVM

G02Q013

How does the CSD articulate the legal basis for its activities to relevant authorities, participants and, where relevant, participants' customers?

PFMI: Q.1.3.1AGC: n/a

Euronext Securities Porto maintains in its website- [Porto | euronext.com](http://Porto.euronext.com) -, duly updated, a set of documentation that includes the company's by-laws, the rules of the Centralised Securities Systems and of the Securities Settlement Systems managed by Euronext Securities Porto, the fee books of Euronext Securities Porto (both for issuers and financial intermediaries) and those related to the affiliation in its systems, notices and explanatory texts regarding the functioning of the systems and services managed by Euronext Securities Porto.

Euronext Securities Porto also maintains updated, operational manuals of the services provided.

Every amendment to the rules or to the operational manuals is communicated to participants by email, or other technical means of communication and are disclosed on Euronext Securities Porto's website.

G02Q014

How does the CSD achieve a high level of confidence that the rules, procedures and contracts related to its operations are enforceable in all relevant jurisdictions identified in PFMI Principle 1 key consideration 1 (for example, through legal opinions and analyses)?

PFMI: Q.1.4.1AGC: n/a

Euronext Securities Porto has rules, procedures, and contracts that are clear and understandable for all the securities settlement systems that it operates and all other services that it provides. Euronext Securities Porto designs its rules, procedures and contracts so that they are enforceable in all relevant jurisdictions, including in case of default of a participant. The Portuguese securities market is ruled by the Portuguese Securities Code approved by Decree -Law 486/99, of 13th November 1999, as amended, and by the Portuguese Corporate Code. Laws, regulations, rules and procedures, and contractual provisions governing the systems managed by Euronext Securities Porto are clearly stated, understandable, public and accessible to all system participants.

The legal framework is comprehensive, covering all the aspects related to the activity of the securities settlement systems and centralised securities systems and gives legal certainty, confidence and security to the participants on those systems.

Euronext Securities Porto's regulations are registered at CMVM, which gives confidence and security to the applicability of those rules, which are publicly disclosed in Euronext Securities Porto's website.

Euronext Securities Porto also maintains updated, operational manuals of the services provided.

If necessary, Euronext Securities Porto may request a legal opinion to clarify any aspects that were considered necessary.

G02Q015

How does the CSD achieve a high degree of certainty that its rules, procedures and contracts will not be voided, reversed or subject to stays? Are there any circumstances in which a CSD's actions under its rules, procedures or contracts could be voided, reversed or subject to stays? If so, what are those circumstances?

PFMI: Q.1.4.2AGC: n/a

Euronext Securities Porto's rules have to be notified in advance to the CMVM which gives confidence and security to the applicability of those rules.

G02Q016

Has a court in any relevant jurisdiction ever held any of the CSD's relevant activities or arrangements under its rules and procedures to be unenforceable?

PFMI: Q.1.4.3AGC: n/a

No

G02Q017  
 If the CSD is conducting business in multiple jurisdictions, how does the CSD identify and analyse any potential conflict-of-laws issues? When uncertainty exists regarding the enforceability of a CSD's choice of law in relevant jurisdictions, has the CSD obtained an independent legal analysis of potential conflict-of-laws issues? What potential conflict-of-laws issues has the CSD identified and analysed? How has the CSD addressed any potential conflict-of-laws issues?

PFMI: Q.1.5.1AGC: n/a

Euronext Securities Porto conducts business in different jurisdictions regarding:

- (i) Issuers/Securities;
- (ii) Participants.

In this context, Euronext Securities Porto takes all reasonable steps to identify and mitigate the risks arising from potential conflicts of law across jurisdictions. The Portuguese legal framework establishes a set of conflicts of law rules, in order to safeguard the certainty in what relates to the issuance of securities and the securities transactions. Euronext Securities Porto evaluates what differences exist between the two jurisdictions in terms of capacity for the securities issue and the representation form of the securities and if the registration in Euronext Securities Porto's systems is feasible. In case of a positive answer Euronext Securities Porto applies to the procedures that enable the integration of the securities issue into its systems. Another aspect that is evaluated refers to corporate actions to be processed through Euronext Securities Porto's systems.

G02Q018  
 filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

**Governance and ownership (PFMI Principle 2)**

G03Q001  
 Summary narrative for PFMI Principle 2. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P2AGC: n/a

Euronext Securities Porto is incorporated under Portuguese Law, and is wholly-owned by Euronext Lisbon – Sociedade Gestora de Mercados Regulamentados, S.A.. Euronext Securities Porto and Euronext Lisbon are part of the Euronext Group. Euronext Securities Porto's corporate bodies are the General Meeting, the Board of Directors and the Sole Auditor. The composition of the corporate bodies has to be communicated to CMVM that will assess the identified members on a fit and proper process. CMVM can oppose to the designation based on good reputation and experience arguments. The composition of the board is approved by the General Meeting, in the terms established in Interbolsa's by-laws and in the Portuguese Corporate Code. The members designed by the General Meeting are subject to registration within CMVM. Euronext Securities Porto 's internal organisation is based on a structure of functional nature established upon a specialisation criterion regarding the tasks allocated to the different Departments.

G03Q002  
 What type of legal entity is the institution?

PFMI: n/aAGC: 3

- Public Company
- Private Company
- Central Bank (or part thereof)
- Stock Exchange (or part thereof)
- OTHER:

G03Q003  
 Is the institution operated as a "for profit" or a "not for profit" organization?"

PFMI: n/aAGC: 4

- For profit
- Not for profit

G03Q004  
 Please provide the names of the owners and their ownership interest percentages.

PFMI: n/aAGC: 5

Euronext Lisbon - Sociedade Gestora de Mercados Regulamentados, S.A. - 100%

G03Q005

What is the date of establishment of the CSD?

Please enter the answer in DD/MM/YYYY format.

If you are filling the survey for more than one organization, please enter the name of each organization in different lines and in front of each one the corresponding date.

PFMI: n/a AGC: 6a

02/04/1993

G03Q006

What is the date that the CSD's operations began?

Please enter the answer in DD/MM/YYYY format.

If you are filling the survey for more than one organization, please enter the name of each organization in different lines and in front of each one the corresponding date.

PFMI: n/a AGC: 6b

16/09/1991

G03Q007

Are participants required to contribute capital to the CSD that would result in ownership of the CSD?

PFMI: n/aAGC: 18

- Yes
- No
- Not applicable

G03Q008

If yes, what fixed amount is required or what formula is used to determine the appropriate contribution level?

PFMI: n/aAGC: 18a.

G03Q009

What are the CSD's objectives, and are they clearly identified?

PFMI: Q.2.1.1AGC: n/a

Euronext Securities Porto has in place clearly defined goals and objectives, such as:

- \* To provide infrastructures and highest quality services to all participants of the securities market, namely to the financial intermediaries and issuer companies, that will fulfil all the needs of the market with efficiency, safety and confidence;
- \* To render services for settlement, issue registration, deposit and safekeeping of securities according to the best international practices;
- \* To follow a strategy focused in the continuous improvement of its products and services according to the customers' needs;
- \* To engage continuously with professionalism in the development and efficiency of the capital market, namely in what concerns the areas of settlement and custody;
- \* To contribute to the development of the capital market by creating competitive conditions, reducing systemic risks and protecting the rights of the investors and other entities involved with the capital market.

To fulfil its mission, Euronext Securities Porto carries out a wide range of activities, guaranteed by a constant care and professionalism, related with the delivering of high standard quality products and services concentrated in the following three main areas, listed in Section A of the Annex of the CSDR:

- \* Initial recording of securities in a book-entry system ('notary service');
- \* Providing and maintaining securities accounts at the top tier level ('central maintenance service'); and
- \* Operating a securities settlement system ('settlement service').

Euronext Securities Porto also performs Non-Banking Type Ancillary Services listed in Section B of the Annex of the CSDR that do not entail credit or liquidity risks.

G03Q010

How does the CSD assess its performance in meeting its objectives?

PFMI: Q.2.1.1AGC: n/a

The performance in meeting the identified objectives is assessed by Euronext Securities Porto's internal controls in place.

G03Q011

How do the CSD's objectives place a high priority on safety and efficiency? How do the CSD's objectives explicitly support financial stability and other relevant public interest considerations?

PFMI: Q.2.1.2AGC: n/a

The identified objectives are assessed by Euronext Securities Porto's internal controls in place in order to guarantee safety, efficiency and to support financial stability.

G03Q012

What are the governance arrangements under which the CSD's board of directors (or equivalent) and management operate? What are the lines of responsibility and accountability within the CSD? How and where are these arrangements documented?

PFMI: Q.2.2.1AGC: n/a

The structure and functioning of Euronext Securities Porto's Board of Directors comply with clear and transparent rules, established in Euronext Securities Porto's by-laws, in Euronext Governance policies and in the Portuguese Corporate Code.

G03Q013

For central bank-operated systems, how do governance arrangements address any possible or perceived conflicts of interest? To what extent do governance arrangements allow for a separation of the operator and oversight functions?

PFMI: Q.2.2.2AGC: n/a

N/A

G03Q014

How does the CSD provide accountability to owners, participants and other relevant stakeholders?

PFMI: Q.2.2.3AGC: n/a

Euronext Securities Porto provides accountability to owners, participants and other relevant stakeholders, through the structures that are in place, namely the General Meeting and the User Committee.

G03Q015

How are the governance arrangements disclosed to owners, relevant authorities, participants and, at a more general level, the public?

PFMI: Q.2.2.4AGC: n/a

For the participants and public in general through Euronext Securities Porto's website. To relevant authorities and to owners, through specific information and reports.

G03Q016

What are the roles and responsibilities of the CSD's board of directors (or equivalent), and are they clearly specified? Please provide details of the structure and composition of your Board together with their industry experience and responsibilities in governing the CSD. What are the qualifications to become a board member?

PFMI: Q.2.3.1AGC: 7d

The Board of Directors is composed of a plurality of members (5), elected for a period of four years, being 2 of them Independent Directors (according to article 27 of CSDR). In compliance with the rules in place the Euronext Securities Porto's Board of Directors is composed of suitable members of sufficiently good reputation with an appropriate mix of skills. The performance of the Board of Directors members is guided by principles of clarity, transparency and independence, in order to maximize the pursuit of the interests of the company in particular and of the capital market in general. The composition of the Board of Directors has to be communicated to CMVM that will assess the identified members on a fit and proper process. CMVM can oppose to the designation based on good reputation and experience arguments.

G03Q017

What are the board's procedures for its functioning, including procedures to identify, address and manage member conflicts of interest? How are these procedures documented, and to whom are they disclosed? How frequently are they reviewed?

PFMI: Q.2.3.2AGC: n/a

The Governance structure of Euronext Securities Porto is established in Euronext Securities Porto's by-laws and in its Code of Ethics and includes the identification of conflicts of interest. Management and staff are aware of the procedures to be adopted and the functionalities and policies in place in order to avoid, identify and report any conflict of interests.

G03Q018

What are the election procedures?

PFMI: Q.2.3.2AGC: 7e

The composition of the Board is determined by the General Meeting, in the terms established in the by-laws and the Portuguese Corporate Companies Act. The Board members designated by the General meeting are subject to no opposition of the CMVM.

G03Q019

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

PFMI: Q.2.3.2AGC: 7f

The duration of the mandate is 4 years, renewable.

G03Q020

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)?

PFMI: Q.2.3.2AGC: 7g

The Board members have equal voting powers except the President that has casting vote (voto de qualidade)

G03Q021

Describe the board committees that have been established to facilitate the functioning of the board. What are the roles, responsibilities and composition of such committees?

PFMI: Q.2.3.3AGC: n/a

Audit Committee, Risk Committee, Remuneration Committee, User Committee.

G03Q022

What are the procedures established to review the performance of the board as a whole and the performance of the individual board members? Who is responsible for regulating the board members?

PFMI: Q.2.3.4AGC: 7h

The performance of Euronext Securities Porto Board of Directors as a whole and the performance of the individual Board members is reviewed every 2 years.

G03Q023

To what extent does the CSD's board have the appropriate skills and incentives to fulfil its multiple roles? How does the CSD ensure that this is the case?

PFMI: Q.2.4.1AGC: n/a

Only those persons who, considering their suitability and professional experience, can be elected as members of the Board of Directors of Euronext Securities Porto. They also have to guarantee to rule their management in accordance with high standards of prudence and efficiency.

Should also be noted that, according to the Portuguese law:

\* The appointment of the members of the Board of Directors must be notified to the CMVM no later than 15 days after its occurrence; also the intention to designate may be communicated to the CMVM, prior to the appointment;

\* The CMVM may, within 30 days of receipt of the communication, oppose the designation (or intention to designate) on the basis of the person's lack of suitability or experience, which cannot start his functions until the period for the abovementioned opposition occurs.

G03Q024

What incentives does the CSD provide to board members so that it can attract and retain members of the board with appropriate skills? How do these incentives reflect the long-term achievement of the CSD's objectives?

PFMI: Q.2.4.2AGC: n/a

Euronext Group has in force a program that creates the ability for the Company to attract and retain high quality staff at all levels.

G03Q025

Does the board include non-executive or independent board members?

PFMI: Q.2.4.3AGC: n/a

 Yes No

G03Q026

If yes, how many?

PFMI: Q.2.4.3AGC: n/a

According to article 27(2) of the CSDR, a CSD shall have a management body of which at least one third, but not less than two of its members, are independent. Currently, Euronext Securities Porto has 2 independent members in its Board of Directors

G03Q027

If the board includes independent board members, how does the CSD define an independent board member? Does the CSD disclose which board member(s) it regards as independent?

PFMI: Q.2.4.4AGC: n/a

Article 27(2) of CSDR provides a definition of the term "independent member". For the purpose of article 27(2) of CSDR "an independent member of the management body means a member of the management board who has no business, family or other relationship that raises a conflict of interests regarding the CSD concerned or its controlling shareholders, its management or its participants, and who has had no such relationship during the five years preceding their membership of the management body.

G03Q028

What are the roles and responsibilities of management, and are they clearly specified?

PFMI: Q.2.5.1AGC: n/a

G03Q029

How are the roles and objectives of management set and evaluated?

PFMI: Q.2.5.2AGC: n/a

The performance of the Management is guided by principles of clarity, transparency and independence, in order to maximize the pursuit of the interests of the company in particular and of the capital market in general.

G03Q030

To what extent does the CSD's management have the appropriate experience, mix of skills and the integrity necessary for the operation and risk management of the CSD? How does the CSD ensure that this is the case?

PFMI: Q.2.5.3AGC: n/a

Euronext Securities Porto's management has sufficiently good reputation and experience and, as such, ensures the sound and prudent management of Euronext Securities Porto.

G03Q031

What is the process to remove management if necessary?

PFMI: Q.2.5.4AGC: n/a

Regarding the removal of members of the management body the Portuguese Corporate Law will apply.

G03Q032

What is the risk management framework that has been established by the board?

PFMI: Q.2.6.1AGC: n/a

The Board of Directors of Euronext Securities Porto has identified and approved the Euronext Securities Porto's risk management framework which comprises risk management policies, procedures, and systems that enable it to identify, measure, monitor and manage risks to which Euronext Securities Porto is/may be exposed.

G03Q033  
How is it documented?

PFMI: Q.2.6.1AGC: n/a

Euronext Securities Porto has approved a risk management framework including the Risk Management Policy and the Risk Appetite Framework

G03Q034  
How does this framework address the CSD's risk tolerance policy, assign responsibilities and accountability for risk decisions (such as limits on risk exposures), and address decision-making in crises and emergencies?

PFMI: Q.2.6.2AGC: n/a

Euronext Securities Porto's risk management framework establishes Euronext Securities Porto's risk tolerance, and assigns responsibilities and accountability for risk decisions.

G03Q035  
What is the process for determining, endorsing and reviewing the risk management framework?

PFMI: Q.2.6.3AGC: n/a

The risk management team develops the risk management framework that is approved by the Euronext Securities Porto Risk Committee, and then addressed by this committee to be approved by Euronext Securities Porto Board of Directors. The risk management framework is reviewed at a minimum on an annual basis.

G03Q036  
What are the roles, responsibilities, authority, reporting lines and resources of the risk management and audit functions?

PFMI: Q.2.6.4AGC: n/a

The roles, responsibilities, authority and reporting lines and resources of risk management are clearly identified in Euronext Securities Porto's documentation.

G03Q037  
How does the board ensure that there is adequate governance surrounding the adoption and use of risk management models? How are these models and the related methodologies validated?

PFMI: Q.2.6.5AGC: n/a

All the governance issues and procedures are well documented.

G03Q038  
How does the CSD identify and take account of the interests of the CSD's participants and other relevant stakeholders in its decision-making in relation to its design, rules, overall strategy and major decisions?

PFMI: Q.2.7.1AGC: n/a

Euronext Securities Porto has a User Committee which includes its participants and relevant stakeholders (in accordance with article 28 of CSDR).

G03Q039  
How does the board consider the views of direct and indirect participants and other relevant stakeholders on these decisions, for example, are participants included on the risk management committee, on user committees such as a default management group or through a public consultation?

PFMI: Q.2.7.2AGC: n/a

Euronext Securities Porto's participants are included in the User Committee.

G03Q040  
How are conflicts of interest between stakeholders and the CSD identified, and how are they addressed?

PFMI: Q.2.7.2AGC: n/a

Euronext Securities Porto has a Conflicts of Interest policy in place to endorse this kind of situation.

G03Q041  
To what extent does the CSD disclose major decisions made by the board to relevant stakeholders and, where appropriate, the public?

PFMI: Q.2.7.3AGC: n/a

When necessary, the Board of Directors can disclose its decisions.

G03042  
filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

**Comprehensive risk management (PFMI Principle 3)**

G04Q001  
Summary narrative for PFMI Principle 3. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P3AGC: n/a

Euronext Securities Porto dedicates a rigorous and permanent attention to the maintenance of a prudent risk profile, balanced and adequate to the experience and the capacity of the organization, preserving the basic objectives of operational stability, solvency, profitability and adequate liquidity.  
Euronext Securities Porto has a Risk Management Framework which describes the procedures and controls to create and preserve value for the Company's stakeholders.

The Enterprise Risk Management Framework is approved by the Euronext Securities Porto 's Board of Directors.

G04Q002  
What types of risk arise in or are borne by the CSD?

PFMI: Q.3.1.1AGC: n/a

Euronext Securities Porto dedicates rigorous and permanent attention to the maintenance of a prudent risk profile, balanced and adequate to the experience and the capacity of the organization, preserving the basic objectives of operational stability, solvency, profitability and adequate liquidity.  
Euronext Securities Porto as CSD is exposed to various risks in relation to the type of its activity and the nature of its institution on the capital market.  
The main risks identified by Euronext Securities Porto are categorized as follows:  
Strategic  
Financial  
Operational including Compliance

G04Q003  
Any direct damages or losses to participants caused by the CSD as a result of force majeure events, acts of God, or political events, etc.?

PFMI: Q.3.1.1AGC: 66x.

Yes

No

Not applicable

G04Q004

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

PFMI: Q.3.1.1AGC: 66y.

- Financial limits are imposed on the amount of liability assumed by the CSD
- The CSD assumes liability for direct losses
- The CSD assumes liability for indirect or consequential losses
- OTHER:

G04Q005

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

PFMI: Q.3.1.1AGC: 66+

- Yes
- No
- Not applicable

G04Q006

Please define the standard of care applied:

PFMI: Q.3.1.1AGC: 66\*

G04Q007

What are the CSD's policies, procedures and controls to help identify, measure, monitor and manage the risks that arise in or are borne by the CSD?

PFMI: Q.3.1.2AGC: n/a

Euronext Securities Porto has a Risk Management Framework which describes the procedures and controls to mitigate risks and to create and preserve value for the Company's stakeholders. It is designed and operated to identify potential events that may affect the Company, assess risk to be within the defined guidelines, manage the risk through control mechanisms, and monitor the risk to understand the evolution.

Risk controls, policies and procedures are approved by the Euronext Securities Porto 's Board of Directors.

G04Q008

What risk management systems are used by the CSD to help identify, measure, monitor and manage its range of risks?

PFMI: Q.3.1.3AGC: n/a

Euronext Securities Porto utilizes the Group risk management tool.

G04Q009

How do these systems provide the capacity to aggregate exposures across the CSD and, where appropriate, other relevant parties, such as the CSD's participants and their customers?

PFMI: Q.3.1.4AGC: n/a

The systems are customised to provide the overall risk exposure of the CSD and other relevant parties.

G04Q010

What is the process for developing, approving and maintaining risk management policies, procedures and systems?

PFMI: Q.3.1.5AGC: n/a

The risk management policies and procedures are developed and maintained by the Risk Chief Officer, and they are reviewed on a yearly basis. The risk framework including the policy and the risk appetite is presented to the Risk Committee and to the Board of Director for approval.

G04Q011

How does the CSD assess the effectiveness of risk management policies, procedures and systems?

PFMI: Q.3.1.6AGC: n/a

Euronext Securities Porto has a set of controls that allow to evaluate the effectiveness of the risk-management system with any amendments subject to regular checks.

[\[UL\]](#) updated

G04Q012

How frequently are the risk management policies, procedures and systems reviewed and updated by the CSD? How do these reviews take into account fluctuation in risk intensity, changing environments and market practices?

PFMI: Q.3.1.7AGC: n/a

A review of risk management policies and procedures is done annually or more frequently should an event (legal, operational, technical, etc) require any adjustments.

G04Q013

What information does the CSD provide to its participants and, where relevant, their customers to enable them to manage and contain the risks they pose to the CSD?

PFMI: Q.3.2.1AGC: n/a

Euronext Securities Porto discloses in its website relevant information (namely rules and procedures) that enable participants to manage and contain the risks. Euronext Securities Porto also answers to the questionnaires sent by customers and participates in the due diligence requested by the customers.

G04Q014

What incentives does the CSD provide for participants and, where relevant, their customers to monitor and manage the risks they pose to the CSD?

PFMI: Q.3.2.2AGC: n/a

G04Q015

How does the CSD design its policies and systems so that they are effective in allowing their participants and, where relevant, their customers to manage and contain their risks?

PFMI: Q.3.2.3AGC: n/a

Euronext Securities Porto 's systems are well-documented and are designed to cover Euronext Securities Porto's operational needs and to help clients manage the operational risks that Euronext Securities Porto faces.

Euronext Securities Porto's IT systems are resilient, including under stressed market conditions; have sufficient capacity to process additional information as a result of increasing settlement volumes; and achieve the service level objectives of Euronext Securities Porto.

G04Q016

How does the CSD identify the material risks that it bears from and poses to other entities as a result of interdependencies? What material risks has the CSD identified?

PFMI: Q.3.3.1AGC: n/a

Euronext Securities Porto as a CSD is exposed to the common industry risks which include operational risks, such as service disruptions or failures by critical service providers, risks linked to participant default and risks related to information security and data integrity. According to Euronext Securities Porto Risk Management Policy a risk profile is presented to the Risk Committee and Board of Directors on a quarterly basis.

Euronext Securities Porto has prepared a Risk Assessment Questionnaire in order to assess the risk posed to the Company by its main participants and its key services providers.

G04Q017

How are these risks measured and monitored? How frequently does the CSD review these risks?

PFMI: Q.3.3.2AGC: n/a

Euronext Securities Porto reviews the main risks on a quarterly basis or more frequently if needed. Moreover, the Company annually analyses the results of the Risk Assessment Questionnaire in order to identify, assess and mitigate the risks posed by clients and providers. Euronext Securities Porto can request from its key participants and critical services providers a detailed description of the contingency procedures implemented, as well as, if necessary, evidences of the measures taken. When needed, Euronext Securities Porto will implement/request appropriate mitigation measures.

G04Q018

What risk management tools are used by the CSD to address the risks arising from interdependencies with other entities?

PFMI: Q.3.3.3AGC: n/a

Euronext Securities Porto monitors the risks with other entities through the analysis of the Risk Assessment Questionnaire results, other documentation provided by main participants and critical services providers and through the contracts with related SLAs and KPIs.

In addition, work is undertaken to ensure that relationships with critical service providers meet DORA requirements, including assessment of third party providers done by risk management, data protection and Information security teams.

G04Q019

How does the CSD assess the effectiveness of these risk management tools? How does the CSD review the risk management tools it uses to address these risks? How frequently is this review conducted?

PFMI: Q.3.3.4AGC: n/a

The review of the processes is conducted at least once a year

G04Q020

How does the CSD identify scenarios that may potentially prevent the CSD from providing its critical operations and services? What scenarios have been identified as a result of these processes?

PFMI: Q.3.4.1AGC: n/a

According to CSD Regulation and its supplementing regulations, Euronext Securities Porto has procedures in place to identify all sources of risks that may impact its on-going functions and takes into consideration the likelihood of potential adverse effects on its revenues or expenses and its level of capital.

As part of its operational resilience framework, Euronext Securities Porto maintains a business continuity plan designed to address scenarios that could prevent the provision of critical operations and services.

The BCP is reviewed and tested at least annually.

G04Q021

How do these scenarios take into account both independent and related risks to which the CSD is exposed?

PFMI: Q.3.4.2AGC: n/a

G04Q022

What plans does the CSD have for its recovery or orderly wind-down?

PFMI: Q.3.4.3AGC: n/a

Building from the wider risk and controls framework, Euronext Securities Porto has developed a Recovery, Restructuring and Orderly Wind-down plan. The plan sets out alternative response strategies to address potential threats to financial viability. The plans are integrated with established processes for risk identification, assessment and analysis, and leverage existing governance and crisis management frameworks.

G04Q023

How do the CSD's key recovery or orderly wind-down strategies enable the CSD to continue to provide critical operations and services?

PFMI: Q.3.4.4AGC: n/a

The key recovery or orderly wind-down strategies contained in Euronext Securities Porto 's recovery plan was designed to enable Euronext Securities Porto to continue to provide critical operations and services.

G04Q024

How are the plans for the CSD's recovery and orderly wind-down reviewed and updated? How frequently are the plans reviewed and updated?

PFMI: Q.3.4.5AGC: n/a

The plans for Euronext Securities Porto 's recovery and orderly wind-down are reviewed and updated at least on an annual basis

G04Q025

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

#### Credit risk (PFMI Principle 4)

G05Q001

Summary narrative for PFMI Principle 4. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P4AGC: n/a

Not applicable

Euronext Securities Porto does not have banking license.

As Euronext Securities Porto does not provide credit facilities to its participants, it has no financial exposure to its participants.

G05Q002

Does the CSD have a banking license?

PFMI: n/aAGC: n/a

Yes

No

G05Q003

Irrespective of whether or not the CSD has a banking license, can it offer cash accounts and/or credit to its participants?

PFMI: n/aAGC: n/a

Yes

No

G05Q004

Please explain:

PFMI: n/aAGC: n/a

G05Q005

What is the CSD's framework for managing credit exposures, including current and potential future exposures, to its participants and arising from its payment, clearing and settlement processes?

PFMI: Q.4.1.1AGC: n/a

G05Q006

How frequently is the framework reviewed to reflect the changing environment, market practices and new products?

PFMI: Q.4.1.2AGC: n/a

G05Q007

How does the CSD identify sources of credit risk? What are the sources of credit risk that the CSD has identified?

PFMI: Q.4.2.1AGC: n/a

G05Q008

How does the CSD measure and monitor credit exposures? How frequently does and how frequently can the CSD recalculate these exposures? How timely is the information?

PFMI: Q.4.2.2AGC: n/a

G05Q009

What tools does the CSD use to control identified sources of credit risk (for example, offering an RTGS or DvP settlement mechanism, limiting net debits or intraday credit, establishing concentration limits, or marking positions to market on a daily or intraday basis)? How does the CSD measure the effectiveness of these tools?

PFMI: Q.4.2.3AGC: n/a

G05Q010

How does the SSS cover its current and, where they exist, potential future exposures to each participant? What is the composition of the CSD's financial resources used to cover these exposures? How accessible are these financial resources?

PFMI: Q.4.3.1AGC: n/a

G05Q011

Does the CSD have a guaranty fund independent of stock exchange or other market guarantees?

PFMI: Q.4.3.1AGC: 78

- Yes
- No
- Not applicable

G05Q012

If yes, please respond to the following questions: What is the size of the fund?

PFMI: Q.4.3.1AGC: 78a.

G05Q013

How is the size of the fund determined?

PFMI: Q.4.3.1AGC: 78b.

- By participant volume
- By asset value
- A fixed amount

G05Q014

How is the fund financed?

PFMI: Q.4.3.1AGC: 78d.

- Contributions from owner
- Contributions from participants
- Funding from retained earnings

G05Q015  
 If so, what is the amount or percentage per owner?

PFMI: Q.4.3.1AGC: 78e.

G05Q016  
 If so, what is the amount or percentage per participant?

PFMI: Q.4.3.1AGC: 78f.

G05Q017  
 Who is covered by the fund?

PFMI: Q.4.3.1AGC: 78h.

Direct CSD participants only

The beneficial owner also

OTHER:

G05Q018  
 When is the guaranty fund used?

PFMI: Q.4.3.1AGC: 78j.

When a broker defaults

When a direct participant defaults

OTHER:

G05Q019  
 To what extent do these financial resources cover the payment system's or SSS's current and potential future exposures fully with a high degree of confidence? How frequently does the payment system or SSS evaluate the sufficiency of these financial resources?

PFMI: Q.4.3.2AGC: n/a

G05Q020  
 If the payment system or SSS is a DNS system in which there is no settlement guarantee, do its participants face credit exposures arising from the payment, clearing and settlement processes? If there are credit exposures in the system, how does the system monitor and measure these exposures?

PFMI: Q.4.3.3AGC: n/a

G05Q021  
 Please confirm whether you maintain insurance policies to cover any liabilities and indemnities that you may incur in connection to the services you provide.

PFMI: Q.4.3.3 AGC: 91

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

OTHER:

G05Q022  
 For insurance of default on settlement, what is the amount of the coverage and the amount of deductible? Please also indicate the currency.

PFMI: Q.4.3.3 AGC: 91a

G05Q023

For Fidelity insurance, what is the amount of the coverage and the amount of deductible? Please also indicate the currency.

PFMI: Q.4.3.3 AGC: 91b

G05Q024

Please explain other loss or default protections:

PFMI: Q.4.3.3AGC: 79a

G05Q025

Does the CSD accept liability (independent of any insurance coverage) for the following: Any direct damages or losses to participants caused by the CSD in its capacity as a central counterparty?

PFMI: Q.4.3.3AGC: 66q.

Yes

No

Not applicable

G05Q026

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

PFMI: Q.4.3.3AGC: 66r.

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

The CSD assumes liability for direct losses

The CSD assumes liability for indirect or consequential losses

OTHER:

G05Q027

If the payment system or SSS is a DNS system in which there is no settlement guarantee and has credit exposures among its participants, to what extent does the payment system's or SSS's financial resources cover, at a minimum, the default of the two participants and their affiliates that would create the largest aggregate credit exposure in the system?

PFMI: Q.4.3.4AGC: n/a

G05Q028

How do the CSD's rules and procedures explicitly address any credit losses it may face as a result of any individual or combined default among its participants with respect to any of their obligations to the CSD? How do the CSD's rules and procedures address the allocation of uncovered credit losses and in what order, including the repayment of any funds a CSD may borrow from liquidity providers?

PFMI: Q.4.7.1AGC: n/a

G05Q029

What are the CSD's rules and procedures on the replenishment of the financial resources that are exhausted during a stress event?

PFMI: Q.4.7.2AGC: n/a

Euronext Securities Porto established rules and procedures on the replenishment of the financial resources that are exhausted during a stress event as: use of surplus cash, obtain a loan from the shareholder and/or open the share capital.

G05Q030

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

#### Collateral (PFMI Principle 5)

G06Q001

Summary narrative for PFMI Principle 5. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P5AGC: 35c

Not applicable.

Euronext Securities Porto does not require any collateral to manage any kind of risks arising from its activity.

If and when Euronext Securities Porto decides to require collateral to manage any kind of risk, it will take into consideration collateral with low credit, liquidity and market risks.

G06Q002

How does the CSD determine whether a specific asset can be accepted as collateral, including collateral that will be accepted on an exceptional basis? How does the CSD determine what qualifies as an exceptional basis? How frequently does the CSD adjust these determinations? How frequently does the CSD accept collateral on an exceptional basis, and does it place limits on its acceptance of such collateral?

PFMI: Q.5.1.1AGC: n/a

G06Q003

How does the CSD monitor the collateral that is posted so that the collateral meets the applicable acceptance criteria?

PFMI: Q.5.1.2AGC: n/a

G06Q004

How does the CSD identify and mitigate possible specific wrong-way risk, for example, by limiting the collateral it accepts (including collateral concentration limits)?

PFMI: Q.5.1.3AGC: n/a

G06Q005

How frequently does the CSD mark its collateral to market, and does it do so at least daily?

PFMI: Q.5.2.1AGC: n/a

G06Q006

To what extent is the CSD authorised to exercise discretion in valuing assets when market prices do not represent their true value?

PFMI: Q.5.2.2AGC: n/a

G06Q007

How does the CSD determine haircuts?

PFMI: Q.5.2.3AGC: n/a

G06Q008

How does the CSD test the sufficiency of haircuts and validate its haircut procedures, including with respect to the potential decline in the assets' value in stressed market conditions involving the liquidation of collateral? How frequently does the CSD complete this test?

PFMI: Q.5.2.4AGC: n/a

G06Q009

How does the CSD identify and evaluate the potential procyclicality of its haircut calibrations? How does the CSD consider reducing the need for procyclical adjustments – for example, by incorporating periods of stressed market conditions during the calibration of haircuts?

PFMI: Q.5.3.1AGC: n/a

G06Q010

What are the CSD's policies for identifying and avoiding concentrated holdings of certain assets in order to limit potential adverse price effects at liquidation? What factors (for example, adverse price effects or market conditions) are considered when determining these policies?

PFMI: Q.5.4.1AGC: n/a

G06Q011

How does the CSD review and evaluate concentration policies and practices to determine their adequacy? How frequently does the CSD review and evaluate these policies and practices?

PFMI: Q.5.4.2AGC: n/a

G06Q012

What are the legal, operational, market and other risks that the CSD faces by accepting cross-border collateral? How does the CSD mitigate these risks?

PFMI: Q.5.5.1AGC: n/a

G06Q013

How does the CSD ensure that cross-border collateral can be used in a timely manner?

PFMI: Q.5.5.2AGC: n/a

G06Q014

What are the primary features of the CSD's collateral management system?

PFMI: Q.5.6.1AGC: n/a

G06Q015

How and to what extent does the CSD track the reuse of collateral and its rights to the collateral provided?

PFMI: Q.5.6.2AGC: n/a

G06Q016

How and to what extent does the CSD's collateral management system accommodate changes in the ongoing monitoring and management of collateral?

PFMI: Q.5.6.3AGC: n/a

G06Q017

To what extent is the collateral management system staffed to ensure smooth operations even during times of market stress?

PFMI: Q.5.6.4AGC: n/a

G06Q018

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

### Liquidity risk (PFMI Principle 7)

G07Q001

Summary narrative for PFMI Principle 7. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P7AGC: n/a

Euronext Securities Porto is authorised under CSDR a CSD without a banking license.

Euronext Securities Porto manages a securities settlement system (SSS) that settles in central bank money in T2S.

Euronext Securities Porto does not provide credit facilities to its participants.

Euronext Securities Porto 's participants have access to a national central bank participating in T2S for the purpose of DvP settlement in T2S. This is also applicable for links between Euronext Securities Porto and other T2S CSDs due to the interoperability of the T2S platform: cross-border DvP settlement for Euro and other T2S eligible currencies takes place in central bank money, through debits and credits done directly in the participants cash accounts (T2S DCAs).

Euronext Securities Porto also manages a non-euro currency Securities Settlement System that settles in commercial bank money (only to support currencies not eligible in T2S platform), through a designated commercial bank, under the threshold established in article 54 (5) of the CSDR. Also, in this case, Euronext Securities Porto does not face any credit or liquidity risk posed by its participants or related to the service provided as the debits and credits are done directly in the participants cash accounts.

Euronext Securities Porto is not exposed to liquidity risk of their participants, except for the payment of Euronext Securities Porto 's invoices. Even in this case the exposure is very limited as 90% of Euronext Securities Porto invoices are charged through T2 accounts at the beginning of the following month.

G07Q002

What is the CSD's framework for managing its liquidity risks, in all relevant currencies, from its participants, settlement banks, nostro agents, custodian banks, liquidity providers and other entities?

PFMI: Q.7.1.1AGC: n/a

G07Q003

What are the nature and size of the CSD's liquidity needs, and the associated sources of liquidity risks, that arise in the CSD in all relevant currencies?

PFMI: Q.7.1.2AGC: n/a

G07Q004

How does the CSD take into account the potential aggregate liquidity risk presented by an individual entity and its affiliates that may play multiples roles with respect to the CSD?

PFMI: Q.7.1.3AGC: n/a

G07Q005

What operational and analytical tools does the CSD have to identify, measure and monitor settlement and funding flows?

PFMI: Q.7.2.1AGC: n/a

G07Q006

How does the CSD use those tools to identify, measure and monitor its settlement and funding flows on an ongoing and timely basis, including its use of intraday liquidity?

PFMI: Q.7.2.2AGC: n/a

G07Q007

How does the payment system or SSS determine the amount of liquid resources in all relevant currencies to effect same day settlement and, where appropriate, intraday or multiday settlement of payment obligations? What potential stress scenarios (including, but not limited to, the default of the participant and its affiliates that would generate the largest aggregate payment obligation in extreme but plausible market conditions) does the payment system or SSS use to make this determination?

PFMI: Q.7.3.1AGC: n/a

G07Q008

What is the estimated size of the liquidity shortfall in each currency that the payment system or SSS would need to cover?

PFMI: Q.7.3.2AGC: n/a

G07Q009

How does the CCP determine the amount of liquid resources in all relevant currencies to settle securities-related payments, make required variation margin payments and meet other payment obligations on time? What potential stress scenarios (including, but not limited to, the default of the participant and its affiliates that would generate the largest aggregate payment obligation in extreme but plausible market conditions) does the CCP use to make this determination?

PFMI: Q.7.4.1AGC: n/a

G07Q010

What is the estimated size of the liquidity shortfall in each currency that would need to be covered, following the default of the participant and its affiliates that would generate the largest aggregate payment obligation to the CCP in extreme but plausible market conditions? How frequently does the CCP estimate this?

PFMI: Q.7.4.2AGC: n/a

G07Q011

Do any of the CCP's activities have a more complex risk profile (such as clearing financial instruments that are characterised by discrete jump-to-default price changes or that are highly correlated with potential participant defaults)? Is the CCP systemically important in multiple jurisdictions?

PFMI: Q.7.4.3AGC: n/a

G07Q012

If the CCP is involved in activities with a more complex risk profile or is systemically important in multiple jurisdictions, has the CCP considered maintaining additional resources sufficient to cover a wider range of stress scenarios that would include the default of the two participants and their affiliates that would generate the largest aggregate payment obligation to the CCP in extreme but plausible market conditions?

PFMI: Q.7.4.4AGC: n/a

G07Q013

What is the size and composition of the CSD's qualifying liquid resources in each currency that is held by the CSD? In what manner and within what time frame can these liquid resources be made available to the CSD?

PFMI: Q.7.5.1AGC: n/a

G07Q014

What prearranged funding arrangements has the CSD established to convert its readily available collateral and investments into cash? How has the CSD established that these arrangements would be highly reliable in extreme but plausible market conditions? Has the CSD identified any potential barriers to accessing its liquid resources?

PFMI: Q.7.5.2AGC: n/a

G07Q015

If the CSD has access to routine credit at the central bank of issue, what is the CSD's relevant borrowing capacity for meeting its minimum liquid resource requirement in that currency?

PFMI: Q.7.5.3AGC: n/a

G07Q016

To what extent does the size and the availability of the CSD's qualifying liquid resources cover its identified minimum liquidity resource requirement in each currency to effect settlement of payment obligations on time?

PFMI: Q.7.5.4AGC: n/a

G07Q017

What is the size and composition of any supplemental liquid resources available to the CSD?

PFMI: Q.7.6.1AGC: n/a

G07Q018

How and on what basis has the CSD determined that these assets are likely to be saleable or acceptable as collateral to obtain the relevant currency, even if this cannot be reliably prearranged or guaranteed in extreme market conditions?

PFMI: Q.7.6.2AGC: n/a

G07Q019

What proportion of these supplemental assets qualifies as potential collateral at the relevant central bank?

PFMI: Q.7.6.3AGC: n/a

G07Q020

In what circumstances would the CSD use its supplemental liquid resources in advance of, or in addition to, using its qualifying liquid resources?

PFMI: Q.7.6.4AGC: n/a

G07Q021

To what extent does the size and availability of the CSD's supplemental liquid resources, in conjunction with its qualifying liquid resources, cover the relevant liquidity needs identified through the CSD's stress test programme for determining the adequacy of its liquidity resources (see key consideration 9)?

PFMI: Q.7.6.5AGC: n/a

G07Q022

Does the CSD use a liquidity provider to meet its minimum required qualifying liquidity resources? Who are the CSD's liquidity providers? How and on what basis has the CSD determined that each of these liquidity providers has sufficient information to understand and to manage their associated liquidity risk in each relevant currency on an ongoing basis, including in stressed conditions?

PFMI: Q.7.7.1AGC: n/a

G07Q023

How has the CSD determined that each of its liquidity providers has the capacity to perform on its commitment in each relevant currency on an ongoing basis?

PFMI: Q.7.7.2AGC: n/a

G07Q024

How does the CSD take into account a liquidity providers potential access to credit at the central bank of issue?

PFMI: Q.7.7.3AGC: n/a

G07Q025

How does the CSD regularly test the timeliness and reliability of its procedures for accessing its liquid resources at a liquidity provider?

PFMI: Q.7.7.4AGC: n/a

G07Q026

To what extent does the CSD currently have, or is the CSD eligible to obtain, access to accounts, payment services and securities services at each relevant central bank that could be used to conduct its payments and settlements and to manage liquidity risks in each relevant currency?

PFMI: Q.7.8.1AGC: n/a

G07Q027

To what extent does the CSD use each of these services at each relevant central bank to conduct its payments and settlements and to manage liquidity risks in each relevant currency?

PFMI: Q.7.8.2AGC: n/a

G07Q028

If the CSD employs services other than those provided by the relevant central banks, to what extent has the CSD analysed the potential to enhance the management of liquidity risk by expanding its use of central bank services?

PFMI: Q.7.8.3AGC: n/a

G07Q029

What, if any, practical or other considerations to expanding its use of relevant central bank services have been identified by the CSD?

PFMI: Q.7.8.4AGC: n/a

G07Q030

How does the CSD use stress testing to determine the amount and test the sufficiency of its liquid resources in each currency? How frequently does the CSD stress-test its liquid resources?

PFMI: Q.7.9.1AGC: n/a

G07Q031

What is the process for reporting on an ongoing basis the results of the CSD's liquidity stress tests to appropriate decision-makers at the CSD? for the purpose of supporting their timely evaluation and adjustment of the size and composition of the CSD's liquidity resources and liquidity risk management framework?

PFMI: Q.7.9.2AGC: n/a

G07Q032

What scenarios are used in the stress tests, and to what extent do they take into account a combination of peak historic price volatilities, shifts in other market factors such as price determinants and yield curves, multiple defaults over various time horizons, simultaneous pressures in funding and asset markets, and a spectrum of forward-looking stress scenarios in a variety of extreme but plausible market conditions?

PFMI: Q.7.9.3AGC: n/a

G07Q033

To what extent do the scenarios and stress tests take into account the CSD's particular payment and settlement structure (for example, real-time gross or deferred net, with or without a settlement guarantee, DVP model 1, 2 or 3 for SSSs), and the liquidity risk that is borne directly by the CSD? by its participants, or both?

PFMI: Q.7.9.4AGC: n/a

G07Q034

To what extent do the scenarios and stress tests take into account the nature and size of the liquidity needs, and the associated sources of liquidity risks, that arise in the CSD to settle its payment obligations on time, including the potential that individual entities and their affiliates may play multiple roles with respect to the CSD?

PFMI: Q.7.9.5AGC: n/a

G07Q035

How frequently does the CSD assess the effectiveness and appropriateness of stress test assumptions and parameters? How does the CSD's stress test programme take into account various conditions, such as a sudden and significant increase in position and price volatility, position concentration, change in market liquidity, and model risk including shift of parameters?

PFMI: Q.7.9.6AGC: n/a

G07Q036

How does the CSD validate its risk management model? How frequently does it perform this validation?

PFMI: Q.7.9.7AGC: n/a

G07Q037

Where and to what extent does the CSD document its supporting rationale for, and its governance arrangements relating to, the amount and form of its total liquid resources?

PFMI: Q.7.9.8AGC: n/a

G07Q038

How do the CSD's rules and procedures enable it to settle payment obligations on time following any individual or combined default among its participants?

PFMI: Q.7.10.1AGC: n/a

G07Q039

How do the CSD's rules and procedures address unforeseen and potentially uncovered liquidity shortfalls and avoid unwinding, revoking or delaying the same day settlement of payment obligations?

PFMI: Q.7.10.2AGC: n/a

G07Q040

How do the CSD's rules and procedures allow for the replenishment of any liquidity resources employed during a stress event?

PFMI: Q.7.10.3AGC: n/a

G06Q041

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

**Settlement finality (PFMI Principle 8)**

G08Q015

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

G08Q001

Summary narrative for PFMI Principle 8. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P8AGC: n/a

Portugal has transposed Directive 98/26/EC of the European Parliament and of the Council of 19 May 1998 on Settlement Finality in Payment and Securities Settlement Systems, as amended, into Portuguese Law (see article 274, 283 and 284 of the Portuguese Securities Code).

The Securities Settlement Systems of Euronext Securities Porto are recognized as a "System" in the meaning of the Settlement Finality Directive.

More recently, article 39 of the CSD Regulation establishes some harmonized principles regarding Settlement Finality.

In a T2S context, Euronext Securities Porto signed the Collective Agreement with the other T2S participating in CSDs and Central Banks, which sets out the rights and obligations of the Parties arising in connection with the harmonized definition of the moment of entry and irrevocability of transfer orders which are subject to matching.

In what concerns, in particular, the functioning of the Securities Settlement Systems managed by Euronext Securities Porto, the moment of entry into the system, the moment of irrevocability and the moment of finality of transfer orders are clearly defined in Interbolsa's regulations.

Article 39 (Settlement Finality) of Interbolsa Regulation 2/2016 expressly refers that:

**- SF1 – Settlement Finality 1 – Moment of entry of transfer orders into the system**

The moment of the entry into the system of settlement instructions, referred to in the Settlement Finality Directive (the designated *Settlement Finality 1*) occurs, for all due and legal purposes, with the validation performed on the T2S platform, according to the T2S rules.

**- SF2 – Settlement Finality 2 – Irrevocability of transfer orders**

The moment of the irrevocability of settlement instructions introduced in the system and properly validated, referred to in the Settlement Finality Directive (the designated *Settlement Finality 2*) occurs, for all due and legal effects, with the matching performed in T2S, and, in accordance with the respective rules, the settlement instructions are insusceptible of unilateral amendment or cancellation by the participants in the operation.

**- SF3 – Settlement Finality 3 – Finality**

The time of settlement finality (the designated *Settlement Finality 3*) occurs, for all due and legal effects, with the settlement processed in T2S.

G08Q002

At what point is the settlement of a payment, transfer instruction or other obligation final, meaning irrevocable and unconditional? Is the point of settlement finality defined and documented? How and to whom is this information disclosed?

PFMI: Q.8.1.1AGC: n/a

Settlement finality moments are, expressly, defined in Euronext Securities Porto's rules (cfr. Article 39 of Interbolsa Regulation 2/2016).

Euronext Securities Porto has an Insolvency Procedures Manual in place, which contains the harmonized procedures adopted by all T2S CSDs and Central Banks.

G08Q003

How does the CSD's legal framework and rules, including the applicable insolvency law(s), acknowledge the discharge of a payment, transfer instruction or other obligation between the CSD and its participants, or between participants?

PFMI: Q.8.1.2AGC: n/a

Settlement finality moments are, expressly, defined in Euronext Securities Porto 's rules (cfr. Article 39 of Interbolsa Regulation 2/2016. Euronext Securities Porto has an Insolvency Procedures Manual in place, which contains the harmonized procedures adopted by all T2S CSDs and Central Banks.

G08Q004

How does the CSD demonstrate that there is a high degree of legal certainty that finality will be achieved in all relevant jurisdictions (for example, by obtaining a well reasoned legal opinion)?

PFMI: Q.8.1.3AGC: n/a

Settlement finality moments are, expressly, defined in Euronext Securities Porto 's rules (cfr. Article 39 of Interbolsa Regulation 2/2016).

Euronext Securities Porto has an Insolvency Procedures Manual in place, which contains the harmonized procedures adopted by all T2S CSDs and Central Banks.

G08Q005

How does the CSD ensure settlement finality in the case of linkages with other CSD?? a) For an SSS, how is consistency of finality achieved between the SSS and, if relevant, the LVPS where the cash leg is settled? b) For a CCP for cash products, what is the relation between the finality of obligations in the CCP and the finality of the settlement of the CCP claims and obligations in other systems, depending on the rules of the relevant CSD/SSS and payment system?

PFMI: Q.8.1.4AGC: n/a

Settlement finality aspects are, expressly, defined in the Portuguese Securities Code and in Euronext Securities Porto's rules (cfr. Interbolsa Regulation 2/2016).

A Collective agreement and common insolvency procedures were adopted by all T2S CSDs and Central Banks.

Euronext Securities Porto has an Insolvency Procedures Manual in place, which contains the harmonized procedures adopted by all T2S CSDs and Central Banks.

G08Q006

Is the CSD designed to complete final settlement on the value date (or same day settlement)? How does the CSD ensure that final settlement occurs no later than the end of the intended value date?

PFMI: Q.8.2.1AGC: n/a

Euronext Securities Porto settles through T2S platform, and according to the harmonized rules and operational procedures in place.

G08Q007

Has the CSD ever experienced deferral of final settlement to the next business day that was not contemplated by its rules, procedures or contracts? If so, under what circumstances? If deferral was a result of the CSD's actions, what steps have been taken to prevent a similar situation in the future?

PFMI: Q.8.2.2AGC: n/a

No

G08Q008

Does the CSD provide intraday or real-time final settlement? If so, how? How are participants informed of the final settlement?

PFMI: Q.8.2.3AGC: n/a

Yes. Real time settlement takes place in T2S platform and settlement occurs according to 's rules (Interbolsa Regulation 2/2016) and operational procedures in place

G08Q009

If settlement occurs through multiple-batch processing, what is the frequency of the batches and within what time frame do they operate? What happens if a participant does not have enough funds or securities at the settlement time? Are transactions entered in the next batch? If so, what is the status of those transactions and when would they become final?

PFMI: Q.8.2.4AGC: n/a

Euronext Securities Porto settles through T2S platform, and according to the harmonized rules and operational procedures in place.

G08Q010

If settlement does not occur intraday or in real time, how has the LVPS or SSS considered the introduction of either of these modalities?

PFMI: Q.8.2.5AGC: n/a

N/A

G08Q011

How does the CSD define the point at which unsettled payments, transfer instructions or other obligations may not be revoked by a participant? How does the CSD prohibit the unilateral revocation of accepted and unsettled payments, transfer instructions or obligations after this time?

PFMI: Q.8.3.1AGC: n/a

Settlement finality aspects are, expressly, defined in the Portuguese Securities Code and in Euronext Securities Porto's rules (cfr. Interbolsa Regulation 2/2016).

Euronext Securities Porto has an Insolvency Procedures Manual in place, which contains the harmonized procedures adopted by all T2S CSDs and Central Banks.

G08Q012  
 Under what circumstances can an instruction or obligation accepted by the system for settlement still be revoked (for example, queued obligations)? How can an unsettled payment or transfer instruction be revoked? Who can revoke unsettled payment or transfer instructions?

PFMI: Q.8.3.2AGC: n/a

Settlement finality aspects are, expressly, defined in the Portuguese Securities Code and in Euronext Securities Porto's rules (cfr. Interbolsa Regulation 2/2016). Euronext Securities Porto has an Insolvency Procedures Manual in place, which contains the harmonized procedures adopted by all T2S CSDs and Central Banks.

G08Q013  
 Under what conditions does the CSD allow exceptions and extensions to the revocation deadline?

PFMI: Q.8.3.3AGC: n/a

Settlement finality aspects are, expressly, defined in the Portuguese Securities Code and in Euronext Securities Porto's rules (cfr. Interbolsa Regulation 2/2016). Euronext Securities Porto has an Insolvency Procedures Manual in place, which contains the harmonized procedures adopted by all T2S CSDs and Central Banks.

G08Q014  
 Where does the CSD define this information? How and to whom is this information disclosed?

PFMI: Q.8.3.4AGC: n/a

Settlement finality aspects are, expressly, defined in the Portuguese Securities Code and in Euronext Securities Porto's rules (cfr. Interbolsa Regulation 2/2016). Euronext Securities Porto has an Insolvency Procedures Manual in place, which contains the harmonized procedures adopted by all T2S CSDs and Central Banks.

**Money settlements (PFMI Principle 9)**

G09Q001  
 Summary narrative for PFMI Principle 9. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P9AGC: n/a

Euronext Securities Porto ensures that all instructions to be settled in Euros are processed only in central bank money, through Target2-Securities (T2S) platform. Euronext Securities Porto has a non-euro currency Settlement System that ensures payment of Corporate Actions (dividends, interests and redemptions) and the settlement of non-guaranteed operations executed in the Euronext Lisbon markets and of OTC operations. The non-euro currency Settlement System managed by Euronext Securities Porto provides settlement in non-euro currency in commercial bank money through a designated credit institution. System participants cannot choose between the two payment systems. Settlement is done according to the currency in cause.

G09Q002  
 How does the CSD conduct money settlements? If the CSD conducts settlement in multiple currencies, how does the CSD conduct money settlement in each currency?

PFMI: Q.9.1.1AGC: n/a

Settlement in Euros is provided in Central Bank Money, through T2S. Non-Euro settlement is provided in Commercial Bank Money, through a commercial bank.

G09Q003  
 Who accepts cash deposits (or makes payment credit accommodations) for CSD transactions?

PFMI: Q.9.1.1 AGC: 31, 31b

CSD  
 Central Bank  
 Banks appointed by CSD  
 Neither or others (e.g. credit lines used)  
 Not applicable  
 OTHER:

G09Q004  
Please indicate the name of the banks appointed by the CSD

PFMI: Q.9.1.1 AGC: 31a

Caixa Geral de Depósitos S.A., only for financial settlement of non-euro currencies.

G09Q005  
Who processes cash clearing (or draws on credit lines, if applicable) for CSD transactions?

PFMI: Q.9.1.1 AGC: 32

CSD

Central Bank

Banks appointed by the CSD

Neither or others (e.g. credit lines used)

Not applicable

OTHER:

G09Q006  
Please name banks appointed by the CSD

PFMI: Q.9.1.1 AGC: 32a

Caixa Geral de Depósitos S.A., only for financial settlement for non-euro currencies.

G09Q007  
Who manages the movement of cash for cash deposits (or draws on credit lines, if applicable)? (Choose all that apply.)

PFMI: Q.9.1.1 AGC: 33, 33b

CSD

Central Bank

Banks appointed by CSD

Neither or others (e.g. credit lines used)

Not applicable

G09Q009  
Who manages the movement of cash for cash clearing (or for draws on credit lines, if applicable)? (Choose all that apply.)

PFMI: Q.9.1.1 AGC: 34, 34b

CSD

Central Bank

Banks appointed by CSD

Neither or others (e.g. credit lines used)

Not applicable

OTHER:

G09Q010  
Please name banks appointed by CSD

PFMI: Q.9.1.1 AGC: 34a

Caixa Geral de Depósitos S.A., only for financial settlement for non-euro currencies.

G09Q011

If the CSD does not settle in central bank money, why is that?

PFMI: Q.9.1.2AGC: n/a

Euronext Securities Porto only does not settle in central bank money for non-Euro currencies not supported by T2S platform.

G09Q012

If central bank money is not used, how does the CSD assess the credit and liquidity risks of the settlement asset used for money settlement?

PFMI: Q.9.2.1AGC: n/a

N/A

G09Q013

If the CSD settles in commercial bank money, how does the CSD select its settlement banks? What are the specific selection criteria the CSD uses?

PFMI: Q.9.2.2AGC: n/a

The commercial bank designated by Euronext Securities Porto was chosen regarding its financial robustness and the fulfilment of the requirements established when the consultation was opened at the time.

G09Q014

How does the CSD monitor the settlement banks adherence to criteria it uses for selection? For example, how does the CSD evaluate the banks regulation, supervision, creditworthiness, capitalisation, access to liquidity and operational reliability?

PFMI: Q.9.3.1AGC: n/a

G09Q015

How does the CSD monitor, manage and limit its credit and liquidity risks arising from the commercial settlement banks? How does the CSD monitor and manage the concentration of credit and liquidity exposures to these banks?

PFMI: Q.9.3.2AGC: n/a

G09Q016

How does the CSD assess its potential losses and liquidity pressures as well as those of its participants if there is a failure of its largest settlement bank?

PFMI: Q.9.3.3AGC: n/a

G09Q017

If an CSD conducts money settlements on its own books, how does it minimise and strictly control its credit and liquidity risks?

PFMI: Q.9.4.1AGC: n/a

G09Q018

Do the CSD's legal agreements with its settlement banks state when transfers occur, that transfers are final when effected, and that funds received are transferable?

PFMI: Q.9.5.1AGC: n/a

Yes

G09Q019

Are funds received transferable by the end of the day at the latest? If not, why? Are they transferable intraday? If not, why?

PFMI: Q.9.5.2AGC: n/a

Yes

G09Q020

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

**Physical deliveries (PFMI Principle 10)**

G10Q001

Summary narrative for PFMI Principle 10. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P10AGC: n/a

The securities in physical form are immobilized in Euronext Securities Porto's system/vault and treated in book-entry form. Actually, and according to the Portuguese Securities Code, securities can be dematerialized or represented by paper form and it is mandatory the record of those securities in a CSD, in book-entry form, for the trading of the same in a regulated market or MTF. Thus, book-entry form can take the form of immobilization or dematerialization.

Euronext Securities Porto maintains vaults for the safekeeping of securities in physical form. Those securities are immobilized in Euronext Securities Porto's vault and represented by book-entry records. Transfers are made by book-entry.

G10Q002

Which asset classes does the CSD accept for physical delivery?

PFMI: Q.10.1.1AGC: n/a

Equities,  
Debt instruments,  
Participation units,  
Participation bonds,  
Convertible bonds,  
Warrants,  
Structured instruments and  
Certificates

G10Q003

How does the CSD define its obligations and responsibilities with respect to the delivery of physical instruments or commodities? How are these responsibilities defined and documented? To whom are these documents disclosed?

PFMI: Q.10.1.2AGC: n/a

Through its regulations, circulars and instructions.

G10Q004

How does the CSD engage with its participants to ensure they have an understanding of their obligations and the procedures for effecting physical delivery?

PFMI: Q.10.1.3AGC: n/a

All procedures are described in the operational documents available at Euronext Securities Porto's website ([Documentation | Euronext Securities Porto](#))

G10Q005

How are eligible securities lodged in the CSD system?

PFMI: Q.10.1.3 AGC: 57, 57a

- A registered certificate in the name of the CSD is delivered to the CSD.
- A participant delivers the security with a valid transfer deed or stock power or other transfer document to the CSD which then effects registration.
- A registrar re-registers the security in the name of the CSD.
- Not applicable
- OTHER:

G10Q006

When are securities lodged into the CSD reflected in a participant's CSD account?

PFMI: Q.10.1.3 AGC: 58, 58a

- Securities are reflected in the participant's CSD account immediately upon delivery to the CSD.
- Securities are re-registered prior to being reflected in the participant CSD account.
- Not applicable
- OTHER:

G10Q007  
How long does it usually take to lodge securities with the CSD?

PFMI: Q.10.1.3 AGC: 59, 59b

- 1 to 2 days
- 3 days to 1 week
- 2 to 4 weeks
- More than 4 weeks
- Not applicable
- Other: 3 days to 1 week for physical securities

G10Q008  
Please specify

PFMI: Q.10.1.3AGC: 59a

G10Q009  
During the process of lodging securities into the CSD, can the securities be traded?

PFMI: Q.10.1.3AGC: 60

- Yes
- No
- Not applicable

G10Q010  
During the process of lodging securities into the CSD, can the securities be settled?

PFMI: Q.10.1.3AGC: 60a

- Yes
- No
- Not applicable

G10Q011  
During the process of lodging securities into the CSD, can the securities have ownership transferred?

PFMI: Q.10.1.3AGC: 60b

- Yes
- No
- Not applicable

G10Q012  
If they cannot be traded, or if you answered other, please explain

PFMI: Q.10.1.3AGC: 60c

G10Q013  
If they cannot be settled, or if you answered other, please explain

PFMI: Q.10.1.3AGC: 60d

Securities cannot be settled during the process of their lodgment with the central securities depository (CSD). Only after the deposit of physical certificates or the crediting of the relevant account within the CSD in the case of dematerialised securities are they eligible for electronic settlement.

G10Q014

If ownership cannot be transferred, or if you answered other, please explain

PFMI: Q.10.1.3AGC: 60e

Securities cannot be transferred during the process of their lodgement with the central securities depository (CSD). The transfer of ownership only occurs through settlement operations after the securities are fully lodged and available in the participant's account.

G10Q015

Are securities immediately available for delivery upon transfer to the CSD?

PFMI: Q.10.1.3 AGC: 61, 61d

- Yes
- No
- Not applicable

G10Q016

If no: Securities are unavailable for

PFMI: Q.10.1.3AGC: 61a

- 1 to 2 days
- 3 days to 1 week
- 2 to 4 weeks
- More than 4 weeks
- Not applicable

G10Q017

If more than 4 weeks, please specify

PFMI: Q.10.1.3AGC: 61b

G10Q018

If not applicable, please explain

PFMI: Q.10.1.3AGC: 61c

G10Q019

What transfer process steps are involved when eligible securities are withdrawn from the CSD for safekeeping?

PFMI: Q.10.1.3 AGC: 63, 63a

- 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 beneficia
- Securities are re-certificated and delivered as bearer instruments.
- Securities are transferred as is any physical delivery in the market.
- Not applicable
- Other: Validation of the withdrawal instruction followed by a withdrawal of fungible certificates from the vault and delivery at the CSD's counter to the participant. In what concerns securities in book-entry form a transfer to another system shall take place: the transfer from a registration system to another should only be considered effective when the integration requirements into the new system are fulfilled and after the former managing entity has certified the exclusion from the system.

G10Q020  
How long does it usually take to remove securities from the CSD?

PFMI: Q.10.1.3 AGC: 64, 64b

- 1 to 2 days
- 3 days to 1 week
- 2 to 4 weeks
- More than 4 weeks
- Not applicable

G10Q021  
If more than 4 weeks, please specify

PFMI: Q.10.1.3AGC: 64a

G10Q022  
While the securities are being removed from the CSD, can they be traded? (Choose one)

PFMI: Q.10.1.3AGC: 65a

- No
- Not applicable
- Yes

G10Q023  
If they cannot be traded please explain

PFMI: Q.10.1.3 AGC: 65b

Withdrawal blocks the withdrawn quantity of securities in the participant' securities account.

G10Q024  
While the securities are being removed from the CSD, can they be settled? (Choose one)

PFMI: Q.10.1.3AGC: 65c

- No
- Not applicable
- Yes

G10Q025  
If they cannot be settled, please explain

PFMI: Q.10.1.3AGC: 65d

Withdrawal blocks the withdrawn quantity of securities in the participant' securities account.

G10Q026  
While the securities are being removed from the CSD, can they have ownership transferred? (Choose one)

PFMI: Q.10.1.3AGC: 65e

- No
- Not applicable
- Yes

G10Q027

If ownership cannot be transferred, please explain

PFMI: Q.10.1.3AGC: 65f

Withdrawal blocks the withdrawn quantity of securities in the participant' securities account.

G10Q028

How does the CSD identify the risks and costs associated with storage and delivery of physical instruments or commodities? What risks and costs has the CSD identified?

PFMI: Q.10.2.1AGC: n/a

G10Q029

What are the vault security procedures for the safekeeping of physical paper?

PFMI: Q.10.2.1AGC: 75

- Not applicable, no vault is maintained
- Electronic keys or combinations
- Dual access control
- Visitor logs
- Vault counts
- Intrusion alarms
- Fire alarms
- Guards
- OTHER: Safekeeping of physical certificates is outsourced to a commercial bank (except for global certificates). The outsourcing contract specifies the security measures that must be adopted.

G10Q030

Please indicate frequency of vault counts:

PFMI: Q.10.2.1AGC: 75a.

G10Q031

Please explain:

PFMI: Q.10.2.1AGC: 75b

Safekeeping of physical certificates is outsourced to a commercial bank (except for global certificates). The outsourcing contract specifies the security measures that must be adopted.

G10Q032

What processes, procedures and controls does the CSD have to monitor and manage any identified risks and costs associated with storage and delivery of physical instruments or commodities?

PFMI: Q.10.2.2AGC: n/a

G10Q033

If an CSD can match participants for delivery and receipt, under what circumstances can it do so, and what are the associated rules and procedures? Are the legal obligations for delivery clearly expressed in the rules and associated agreements?

PFMI: Q.10.2.3AGC: n/a

N/A

G10Q034

How does the CSD monitor its participants' delivery preferences and, to the extent practicable, ensure that its participants have the necessary systems and resources to be able to fulfil their physical delivery obligations?

PFMI: Q.10.2.4AGC: n/a

G10Q035  
filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

**Central Securities Depositories (PFMI Principle 11)**

G11Q001  
Summary narrative for PFMI Principle 11. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P11AGC: n/a

According to the Portuguese Securities Code, securities can be dematerialized or represented by paper form and it is mandatory the record of those securities in a CSD, in book-entry form, for the trading of the same in a regulated market or MTF. Book-entry form can take the form of immobilization or dematerialization. Euronext Securities Porto maintains vaults for the safekeeping of securities in physical form. Those securities are immobilized in Euronext Securities Porto's vault and represented by book entry records. Transfers are made by book-entry. Currently, and according to the Portuguese Securities Code, it is neutral to issue physical or dematerialized securities, but most of the securities integrated in the centralized securities systems managed by Euronext Securities Porto are dematerialized securities.

Holdings and transfers of those securities are carried out, through Euronext Securities Porto's systems, by book-entry records.

Euronext Securities Porto ensures the integrity of the issue, ensuring that the quantity of securities in circulation correspond to the quantity issued.

According to articles 88 and 91 of the Portuguese Securities Code centralized securities systems consist of interlinked groups of accounts, through which the constitution and transfer of securities is processed and which assume control over the amount of securities in circulation, and their inherent rights. The centralized system of Euronext Securities Porto is constituted by the following accounts: (a) Issue accounts, opened by the issuer, according to Article 44(1) of the Portuguese Securities Code; (b) Individual registration accounts, opened by financial intermediaries authorized for this purpose; (c) Issue controlling accounts, opened by each of the issuers with Euronext Securities Porto, according to Article 44(3) (a) of the Portuguese Securities Code; (d) Accounts for the control of individual registration accounts, opened by financial intermediaries with Euronext Securities Porto.

The accounts opened by the financial intermediaries in Euronext Securities Porto are global or individual accounts (depending on the level of segregation required) opened in the name of each one of the entities authorized to manage individual registration accounts, and the sum of the respective totals should be, in relation to each category of securities, equal to the sum of the total of each one of the individual registration accounts opened in their books.

These accounts should separately disclose the amount of securities held by each financial intermediary acting as registering entity and holder.

Specific sub-accounts are opened with the centralized systems of Euronext Securities Porto, relating to pledged securities or securities which may not be transferred or, for any other reason, may not fulfill the requirements of trading on a regulated market.

To address the operational risks related to settlement, safekeeping and custody activities, Euronext Securities Porto has in force some control objectives:

- Adequate information is produced and used to monitor processing integrity; and
- Specific controls and procedures are in place to verify securities balances after all movements occurred in the securities accounts opened with Euronext Securities Porto.

Securities issuing account integrity is the first role of Euronext Securities Porto. All processes are defined to ensure a permanent balance between issuing account and participants' assets that ensures the rights of every stakeholder.

In the case of insolvency of Euronext Securities Porto, insolvency rules will apply and a judge or administrator of insolvency will set up the necessary and adequate procedures, namely how the services are continued and when they are terminated, in order to not prevent Euronext Securities Porto from performing their services, ensuring a smooth transition or transfer of activity to another entity for the benefit of all stakeholders. The same will be ensured in the case of liquidation of Euronext Securities Porto.

G11Q002  
CSD 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. For which of the following security types do you serve as a CSD or clearing system?

PFMI: n/a AGC: 26

- Government securities
- Equities
- Corporate bonds
- Corporate money market
- Not applicable
- OTHER: Participation units / Participation bonds / Convertible bonds / Warrants / Structured instruments / Certificates / Rights

G11Q003  
Please name the other security types:

PFMI: n/aAGC: 26a.

- Participation units
- Participation bonds
- Convertible bonds
- Warrants
- Structured instruments
- Certificates
- Rights

G11Q004

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.)

PFMI: n/a AGC: 27 (part 1), 27c

- Yes by law for all instrument types (please answer 27a)
- Yes by market practice for all instrument types (please answer 27b)
- Yes by law and by market practice, for all instrument types (please answer 27b)
- OTHER: Safekeeping of securities at Euronext Securities Porto is compulsory by law, irrespective of instrument type, for all securities traded in a regulated market, (MTF or OTF) in Portugal. In the other cases it is voluntary.

G11Q004A

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.)

PFMI: n/a AGC: 27 (part 2), 27c

- Yes by law for all instrument types (please answer 27a)
- Yes by market practice for all instrument types (please answer 27b)
- Yes by law and by market practice, for all instrument types (please answer 27b)
- OTHER:

G11Q005

Please list the instrument types for which it is not compulsory by law to: (i) settle in your CSD

PFMI: n/a AGC: 27a. (i)

G11Q006

(ii) safekeep in your CSD:

PFMI: n/a AGC: 27a. (ii)

G11Q007

Please list the instrument types for which it is not compulsory by market practice to: (i) settle in your CSD

PFMI: n/a AGC: 27b. (i)

G11Q008

(ii) safekeep in your CSD:

PFMI: n/a AGC: 27b. (ii)

G11Q009

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

PFMI: n/a AGC: 28 28a

Euronext Securities Porto settles all trades (100%) executed in the markets/systems managed by Euronext Lisbon, irrespective of the instrument type.

G11Q010

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

PFMI: n/a AGC: 28b.

Euronext Securities Porto holds in safekeeping all the securities traded in the markets/systems in Portugal (100%). In addition, Euronext Securities Porto holds also securities not traded in regulated markets/MTF/ OTF

G11Q011

How are the rights of securities issuers and holders safeguarded by the rules, procedures and controls of the CSD?

PFMI: Q.11.1.1AGC: n/a

G11Q012

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: By the participant's clients?

PFMI: Q.11.1.1AGC: 44a

 Yes No

G11Q013

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:

PFMI: Q.11.1.1AGC: 44b

G11Q014

By the intervening authorities controlling insolvency or other proceedings?

PFMI: Q.11.1.1AGC: 44d.

 Yes No

G11Q015

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

PFMI: Q.11.1.1AGC: 44e.

Legally appointed intervening authorities can have access to the accounts by requesting information and instructing transfer operations directly to Euronext Securities Porto.

G11Q016

By the participant's creditors?

PFMI: Q.11.1.1 AGC: 44g, 44i

 Yes No

G11Q017

If yes, please describe briefly under what conditions access would be granted to the participant's creditors:

PFMI: Q.11.1.1AGC: 44h

G11Q018

By the CSD's creditors?

PFMI: Q.11.1.1AGC: 44j.

 Yes No

G11Q019

If yes, please describe briefly under what conditions access would be granted to the CSD's creditors:

PFMI: Q.11.1.1AGC: 44k.

G11Q020  
 What is your document and record retention policy for documents and records described above in this section?  
 PFMI: Q.11.1.1 AGC: 47, 47a

- 6 months or less
- 1 year
- 3 years
- 5 years
- 7 years
- 10 years

G11Q021  
 Does the law protect participant assets from claims and liabilities of the CSD?  
 PFMI: Q.11.1.1AGC: 54

- Yes
- No
- Not applicable

G11Q022  
 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.)  
 PFMI: Q.11.1.1 AGC: 55

- Yes, for proprietary accounts (please answer 55a)
- No
- Yes, for client designated accounts (Please answer 55b)

G11Q023  
 If yes, for what reasons are liens or similar claims imposed for proprietary accounts? (Choose all that apply.)  
 PFMI: Q.11.1.1 AGC: 55a

- Fees and expenses
- Collateralization of overdrafts
- To secure payment for purchased securities
- OTHER:

G11Q024  
 Please describe:  
 PFMI: Q.11.1.1AGC: 55b

G11Q025  
 Please describe highlighting any difference in approach between proprietary and client designated accounts.  
 PFMI: Q.11.1.1 AGC: 55c

G11Q026  
 Please indicate the limits of this lien as indicated below: (Choose all that apply.)  
  
 PFMI: Q.11.1.1 AGC: 55d

- 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)

G11Q027  
 If a lien is placed on a participant's account which has been designated for its clients, will the CSD select certain securities to be subject to the lien?  
  
 PFMI: Q.11.1.1AGC: 55e

- Yes
- No

G11Q028  
 If yes, please indicate whether:  
  
 PFMI: Q.11.1.1 AGC: 55f

- The lien is placed on the most liquid securities in the account
- The lien is placed on the securities with the greatest value in the account
- The lien can only be placed for the securities/trades in question

G11Q029  
 Please explain:  
  
 PFMI: Q.11.1.1AGC: 55g

G11Q030  
 If no, please indicate whether the entire account will be subject to the lien.  
  
 PFMI: Q.11.1.1AGC: 55h

- Yes
- No

G11Q031  
 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?  
  
 PFMI: Q.11.1.1AGC: 55j

- Yes
- No

G11Q032  
 If yes, are the restrictions accomplished by:  
  
 PFMI: Q.11.1.1AGC: 55k

- Contract between the CSD and the participant

G11Q033  
Please explain:  
  
PFMI: Q.11.1.1AGC: 55I

G11Q034  
Transfer of Legal Ownership. Does the CSD have legal authority to transfer title to securities?  
  
PFMI: Q.11.1.1 AGC: 56, 56e

Yes  
 No  
 Not applicable

G11Q035  
When does title or entitlement to CSD securities pass between participants?  
  
PFMI: Q.11.1.1AGC: 56a

At the end of the business day on which the transfer occurs  
 When corresponding money or other consideration is transferred  
 When the transaction is processed on an intra-day basis

G11Q036  
Please describe:  
  
PFMI: Q.11.1.1AGC: 56b

G11Q037  
Where does title or entitlement to CSD securities pass between participants?  
  
PFMI: Q.11.1.1AGC: 56c

On the CSD books  
 On the registrars books

G11Q038  
Please describe:  
  
PFMI: Q.11.1.1AGC: 56d

G11Q039  
How do the CSD's rules, procedures and controls ensure that the securities it holds on behalf of participants are appropriately accounted for on its books and protected from risks associated with the other services the CSD may provide?  
  
PFMI: Q.11.1.2AGC: n/a

G11Q040  
In what form does the CSD maintain records identifying the assets of each participant?  
  
PFMI: Q.11.1.2AGC: 45

Computer file  
 Hard copy  
 OTHER:

G11Q041

In which format is the source data maintained?

PFMI: Q.11.1.2AGC: 45b

G11Q042

How does the CSD ensure that it has robust accounting practices? Do audits review whether there are sufficient securities to satisfy customer rights? How frequently are end-to-end audits conducted to examine the procedures and internal controls used in the safekeeping of securities?

PFMI: Q.11.1.3AGC: n/a

The securities registered within the systems of Euronext Securities Porto are subject to the principle of double-entry accounting, not allowing non-balanced records.

G11Q043

What are the CSD's internal procedures to authorise the creation and deletion of securities? What are the CSD's internal controls to prevent the unauthorised creation and deletion of securities?

PFMI: Q.11.1.4AGC: n/a

Creation and deletion of securities is managed by Euronext Securities Porto operational team.

G11Q044

Does the CSD conduct periodic and at least daily reconciliation of the totals of securities issues in the CSD for each issuer (or its issuing agent)? How does the CSD ensure that the total number of securities recorded in the CSD for a particular issue is equal to the amount of securities of that issue held on the CSD's books?

PFMI: Q.11.1.5AGC: n/a

Yes. Euronext Securities Porto conducts daily reconciliation. Euronext Securities Porto has in place reconciliation measures to verify that the number of securities issues centrally and not centrally maintained recorded in the securities accounts is equal to the sum of securities recorded on the securities accounts of its participants.

G11Q045

If the CSD is not the official registrar of the issues held on its books, how does the CSD reconcile its records with official registrar?

PFMI: Q.11.1.6AGC: n/a

G11Q046

If the securities held with the CSD 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 CSD (e.g., authentication procedures, reconciliation, confirmation of position at registrar)? Please describe:

PFMI: Q.11.1.6AGC: 52i

G11Q047

How does the CSD prevent overdrafts and debit balances in securities accounts?

PFMI: Q.11.2.1AGC: n/a

Securities overdrafts, debit balances or securities creation are not allowed in the systems operated by Euronext Securities Porto.

G11Q048

Are securities issued or maintained in a dematerialised form? What percentage of securities is dematerialised, and what percentage of the total volume of transactions applies to these securities?

PFMI: Q.11.3.1AGC: n/a

Yes

G11Q049

How are CSD eligible securities held by the CSD?

PFMI: Q.11.3.1 AGC: 50, 50a

- In dematerialized form
- In certificated form
- OTHER:

G11Q050

If securities are issued as a physical certificate, is it possible to immobilise them and allow their holding and transfer in a book-entry system? What percentage of securities is immobilised, and what percentage of the total volume of transactions applies to immobilised securities?

PFMI: Q.11.3.2AGC: n/a

Yes. All physical certificates are immobilised in the vault, and they are held and transferred in a book-entry system.

G11Q051

If CSD eligible securities are certificated, can CSD eligible securities be held outside of the CSD?

PFMI: Q.11.3.2AGC: 51

- All eligible securities must be held in the CSD
- Securities may move freely into and out of the CSD
- Once entered into the CSD, eligible securities must remain in the CSD
- Certain designated securities may be held outside the CSD
- Not applicable

G11Q052

If certain designated securities are held outside the CSD, please indicate under which conditions these securities would be held outside the CSD:

PFMI: Q.11.3.2AGC: 51a

G11Q053

If CSD eligible securities are required to be centrally immobilized at the CSD, where and with whom are the certificates safekept? (then please answer 51c)

PFMI: Q.11.3.2AGC: 51b

G11Q054

Are these certificates:

PFMI: Q.11.3.2 AGC: 51c

- Bearer
- Registered
- OTHER:

G11Q055

If registered, how are the CSD eligible securities registered?

PFMI: Q.11.3.2AGC: 51d

- In the name of the CSD
- In the name of the depositing participant or its nominee
- In the name of a separate nominee of the CSD
- OTHER: In the name of the beneficial owner

G11Q056

If in the name of a separate nominee, please identify by name the nominee used:

PFMI: Q.11.3.2AGC: 51f

G11Q057

If CSD eligible securities may be held either in or out of the CSD, are these certificates:

PFMI: Q.11.3.2AGC: 51h

- Bearer
- Registered

G11Q058

What are the control features for receipt of certificates to the CSD (e.g., authentication procedures, re-registration)? Please describe:

PFMI: Q.11.3.2AGC: 51i

Authentication and validation of the certificates and validation of the certificate numbers (and/or securities numbers, if applicable).

Registration of ownership is done in the books of Euronext Securities Porto's participants.

G11Q059

If securities are dematerialized: May dematerialized security positions be re-certificated and held outside the CSD?

PFMI: Q.11.3.2AGC: 52

- Yes
- No
- Not applicable
- Other: Participants may request securities re-certification only for the purpose of trading abroad. Issuers may request the conversion of the whole issue to certificated form.

G11Q060

Are the securities held:

PFMI: Q.11.3.2 AGC: 52a, 52k

- Through book-entry at the CSD
- Through book-entry at a registrar or issuer
- OTHER:

G11Q061

Please identify which types of entities may act as registrars:

PFMI: Q.11.3.2AGC: 52b

- Issuers
- Separate companies that perform registrar functions
- CSD
- OTHER:

G11Q062

If the securities held by the CSD are recorded by book entry at the registrar, are the securities registered only to the CSD, with the CSD providing the function of recording ownership on a centralized basis for the market?

PFMI: Q.11.3.2AGC: 52d

- Yes
- No

G11Q063

If yes, how are securities held at the registrar for the account of the CSD?

PFMI: Q.11.3.2AGC: 52e

- In the name of the CSD
- In the name of a separate nominee of the CSD

G11Q064

Please describe:

PFMI: Q.11.3.2AGC: 52f

G11Q065

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

PFMI: Q.11.3.2AGC: 52g

- The beneficial owner
- A nominee

G11Q066

Please describe:

PFMI: Q.11.3.2AGC: 52h

G11Q067

What incentives, if any, does the CSD provide to immobilise or dematerialise securities?

PFMI: Q.11.3.3AGC: n/a

G11Q068

How do the CSD's rules and procedures protect assets against custody risk, including the risk of loss because of the CSD's negligence, misuse of assets, fraud, poor administration, inadequate recordkeeping or failure to protect participants' interests in their securities?

PFMI: Q.11.4.1AGC: n/a

G11Q069

Does the CSD accept liability (independent of any insurance coverage) for the following: Reconciliation errors with the registrar and/or the issuer that result in direct damages or losses to participants?

PFMI: Q.11.4.1 AGC: 66, 66a, 66d

- No
- Not applicable
- Yes

G11Q070

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

PFMI: Q.11.4.1 AGC: 66b 66c

- Financial limits are imposed on the amount of liability assumed by the CSD
- The CSD assumes liability for direct losses
- The CSD assumes liability for indirect or consequential losses
- OTHER:

G11Q071  
 Theft of securities (either physical certificate or electronically from accounts at the CSD) from the CSD that results in direct damages or losses to participants?

PFMI: Q.11.4.1 AGC: 66e, 66g, 66h

No  
 Yes  
 Not applicable

G11Q072  
 If yes, please check all of the following that apply:

PFMI: Q.11.4.1 AGC: 66f

Financial limits are imposed on the amount of liability assumed by the CSD  
 The CSD assumes liability for direct losses  
 The CSD assumes liability for indirect or consequential losses  
 OTHER:

G11Q073  
 Failure of the CSD's systems that result in direct damages or losses to participants because they cannot use either securities or funds?

PFMI: Q.11.4.1 AGC: 66i, 66l

No  
 Yes  
 Not applicable

G11Q074  
 If yes, please check all of the following that apply:

PFMI: Q.11.4.1 AGC: 66j, 66k

Financial limits are imposed on the amount of liability assumed by the CSD  
 The CSD assumes liability for direct losses  
 The CSD assumes liability for indirect or consequential losses  
 OTHER:

G11Q075  
 Any direct damages or losses to participants caused by the CSD due to its errors, omissions or fraud?

PFMI: Q.11.4.1 AGC: 66m, 66p.

Yes  
 No  
 Not applicable  
 OTHER:

G11Q076  
 If yes, please check all of the following that apply:

PFMI: Q.11.4.1 AGC: 66n.

Financial limits are imposed on the amount of liability assumed by the CSD  
 The CSD assumes liability for direct losses  
 The CSD assumes liability for indirect or consequential losses  
 OTHER:

G11Q077  
How has the CSD determined that those rules and procedures are consistent with the legal framework?

PFMI: Q.11.4.2AGC: n/a

G11Q078  
Is the CSD immune from legal action in its own jurisdiction?

PFMI: Q.11.4.2AGC: 68

Yes

No

G11Q079  
What other methods, if any, does the CSD employ to protect its participants against misappropriation, destruction and theft of securities (for example, insurance or other compensation schemes)?

PFMI: Q.11.4.3AGC: n/a

Insurances

G11Q080  
For Insurance for Operational Errors and Error & Omissions, what is the amount of the coverage and the amount of deductible? Please also indicate the currency.

PFMI: Q.11.4.3 AGC: 91c

This information is not made available to the public.

G11Q089  
For Insurance for the Premises, what is the amount of the coverage and the amount of deductible? Please also indicate the currency.

PFMI: Q.11.4.3 AGC: 91d

This information is not made available to the public.

G11Q096  
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.

PFMI: Q.11.4.3 AGC: 97

1st Layer - Zurich, Liberty - 2nd layer HCC, Liberty, Zurich, Navigators, Generali, Argo

G11Q097  
Who is the insurance carrier's parent company, if applicable? (If inapplicable, simply type n/a.)

PFMI: Q.11.4.3AGC: 97a.

N/A

G11Q098  
What is the term of the policy?

PFMI: Q.11.4.3AGC: 97b.

1 year renewing yearly

G11Q099  
Who does the insurance cover?

PFMI: Q.11.4.3 AGC: 97c, 97d

CSD

Direct CSD participants

Final investors

Not applicable

OTHER:

G11Q100

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:

PFMI: Q.11.4.3AGC: 98

G11Q101

filecount - Upload document here:

PFMI: Q.11.4.3AGC: 98a.

G11Q102

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

PFMI: Q.11.4.3 AGC: 67a, 67b.

 Yes No Not applicable OTHER:

G11Q103

Please explain (then please answer 67c):

PFMI: Q.11.4.3AGC: 67b.

G11Q104

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

PFMI: Q.11.4.3AGC: 67c.

G11Q105

Insurance

PFMI: Q.11.4.3 AGC: 67d.

 Yes No Not applicable OTHER:

G11Q106

Please explain (then please answer 67f):

PFMI: Q.11.4.3AGC: 67e.

Insurance for civil liabilities.

G11Q107

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

PFMI: Q.11.4.3AGC: 67f.

Professional Indemnity & Crime – Purpose of the Policy: (i) PI – Claims arising out of negligence, errors or omissions while rendering services of a professional nature and/or failure to meet contractual obligations in the conduct of its activities. (ii) Crime – Loss resulting directly from one or more dishonest or fraudulent acts (fund embezzlement) committed by an employee or third party

G11Q108

Acknowledgement of liability for losses caused by CSD's own actions.

PFMI: Q.11.4.3AGC: 67g.

- Yes
- No
- Not applicable

G11Q109

Please explain (then please answer 67i):

PFMI: Q.11.4.3AGC: 67h.

G11Q110

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

PFMI: Q.11.4.3AGC: 67i.

G11Q111

Other

PFMI: Q.11.4.3AGC: 67j.

- Yes
- No

G11Q112

Please explain (then please answer 67l):

PFMI: Q.11.4.3AGC: 67k.

G11Q113

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

PFMI: Q.11.4.3AGC: 67l.

G11Q114

What segregation arrangements are in place at the CSD? How does the CSD ensure segregation between its own assets and the securities of its participants? How does the CSD ensure segregation among the securities of participants?

PFMI: Q.11.5.1AGC: n/a

Euronext Securities Porto keeps records and accounts that enable:

- (a) To segregate, at any time and without delay, the securities of a participant from those of any other participant and, if applicable, from its own assets;
  - (b) To segregate the securities of the participant from those of the participant's clients;
  - (c) Participants to hold in one securities account the securities that belong to different clients of that participant (Omnibus Client Segregation);
  - (d) Participants to segregate the securities of any of the participant's clients, if and as required by the participant (Individual Client Segregation).
- Euronext Securities Porto does not hold securities for its own.

G11Q115

Are participants permitted to maintain more than one account at the CSD?

PFMI: Q.11.5.1AGC: 41

- Yes
- No
- Not applicable

G11Q116

If yes, please indicate number:

PFMI: Q.11.5.1 AGC: 41a, 41c

- An unlimited number of accounts
- More than one account
- OTHER:

G11Q117

If more than one account what is the maximum?

PFMI: Q.11.5.1AGC: 41b

G11Q118

Where supported by the legal framework, how does the CSD support the operational segregation of securities belonging to participants' customers from the participants' book? How does the CSD facilitate the transfer from these customers' accounts to another participant?

PFMI: Q.11.5.2AGC: n/a

G11Q119

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

PFMI: Q.11.5.2 AGC: 42

- Yes
- No
- Not applicable
- OTHER:

G11Q120

If yes, is segregation required or simply permitted?

PFMI: Q.11.5.2AGC: 42a

- Required
- Permitted

G11Q121

How does segregation occur?

PFMI: Q.11.5.2 AGC: 42b, 42c

- Omnibus (By separately designated participant accounts.)
- Omnibus with sub account (By sub-accounts within a single participant account.)
- Segregated (By separately designated beneficial owner accounts.)
- OTHER:

G11Q122

Is the nominee account concept being recognised in your market?

PFMI: Q.11.5.2 AGC: 43, 43b

- Yes
- No
- Not applicable

G11Q123

If yes, does the depository permit its participants to open accounts in the participant's own nominee name(s)?

PFMI: Q.11.5.2 AGC: 43a

 Yes No

G11Q125

Does the CSD provide services other than central safekeeping and administration of securities and settlement? If so, what services?

PFMI: Q.11.6.1AGC: n/a

Yes, Non-Banking type ancillary services

G11Q126

Please indicate services you provide.

PFMI: Q.11.6.1AGC: 35

- Own list or: AGC: 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.
- Collateral handling in support of activities including securities lending, overdraft coverage, cash management, repurchase agreements, etc.
- Same day turnaround settlements.
- Information on distribution of new issues (IPO, Privatization).
- Not applicable
- OTHER: Securities registration - Corporate actions processing - Corporate actions control and processing notification/confirmation - Issue control and registration - Securities Lending Management System - Investment Funds Order Routing - Safekeeping of physical securities - Identification of shareholders (to issuer and only for registered securities) - Assignment of ISIN, FISIN and CFI codes for securities and other financial instruments

G11Q127

Automatic securities lending facility is provided for:

PFMI: Q.11.6.1AGC: 35a

- Brokers
- Banks
- Other financial institutions
- OTHER:

G11Q128

If collateral handling, please provide details

PFMI: Q.11.6.1 AGC: 35c

G11Q129

Other, please explain:

PFMI: Q.11.6.1AGC: 35d

- Securities registration
- Corporate actions processing
- Corporate actions notification/confirmation
- Securities Lending Management System
- Investment Funds Order Routing
- Safekeeping of physical securities
- Identification of shareholders (to issuer and only for registered securities)
- Assignment of ISIN, FISIN and CFI codes for securities and other financial instruments

G11Q130

What procedures are in place for the processing of corporate action entitlements?

PFMI: Q.11.6.1AGC: 36

- Credited to the securities account on the day indicated below regardless of whether actually collected by the CSD on the scheduled date.
- Credited to the securities account upon actual receipt by the CSD.
- Corporate action entitlements are handled by an entity separate from the CSD.
- Not applicable
- OTHER: Entitlements are credited to the securities accounts in the overnight batch process (T2S Night-time Settlement – NTS) as a result of the corporate action processing according to the account positions of the underlying security on Record Date or the rights issue or instructions received from the issuer. These entitlements are available in the beginning of the payment date.

G11Q131

Credited to the securities account:

PFMI: Q.11.6.1AGC: 36a

- On pay date.
- On pay date +1.
- On pay date +2.
- OTHER:

G11Q132

Name of entity:

PFMI: Q.11.6.1AGC: 36c

G11Q133

What procedures are in place for the processing of interest and dividends?

PFMI: Q.11.6.1 AGC: 37, 37d.

- Credited to the cash account on the day indicated below regardless of whether actually collected by the CSD on the scheduled date.
- Credited to the cash account upon actual receipt by the CSD.
- Income and dividend collection is handled by an entity separate from the CSD.
- Not applicable
- OTHER: For interest and dividends payments in Euro the cash accounts at T2S (DCAs) are credit at the same time is done the debit in the cash account at T2S (DCAs) of the paying agent, entity designated by the issuer. For income payments in non-Euro the cash accounts at Caixa Geral de Depósitos, the entity that manages the Non-Euro Payment System, are credit at the same time is done the debit in the cash account of the paying agent, entity designated by the issuer, at CGD,

G11Q134

Credited to the cash account:

PFMI: Q.11.6.1AGC: 37a

- On pay date.
- On pay date +1.
- On pay date +2.
- OTHER:

G11Q135

Name of entity:

PFMI: Q.11.6.1AGC: 37c

G11Q136

If the CSD provides services other than central safekeeping and administration of securities and settlement, how does it identify the risks associated with those activities, including potential credit and liquidity risks? How does it measure, monitor and manage these risks, including legally separating services other than safekeeping and administration of securities where necessary?

PFMI: Q.11.6.2AGC: n/a

At 08:30 (WET) on payment date the payment instructions are sent to the TARGET2-Securities platform to debit the cash account (DCA) of the Paying Agent designated by the issuer and the cash accounts (DCAs) of the participants are credited in the T2S platform according to the positions in the securities accounts on record date. In relation with the securities (bonds) denominated in a non-euro currency (namely in USD, JPY, GBP, CHF, AUD and CAD), between 09:30 and 11:00 (WET) on payment date the cash account of the paying agent designated by the issuer is debited and the cash accounts of the participants are credited in Caixa Geral de Depósitos, SA (the entity which runs the non-euro currency payment system), according to the positions in the securities accounts on record date.

G11Q137

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

### Exchange-of-value settlement systems (PFMI Principle 12)

G12Q001

Summary narrative for PFMI Principle 12. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P12AGC: n/a

The securities settlement systems managed by Euronext Securities Porto have in place procedures that facilitate the settlement of transactions on the intended settlement date. According to the legal framework in force, all DVP instructions can only be settled if cash and securities are available. Securities instructions do not settle if the correspondent cash legs do not settle and vice-versa. If the cash and/or securities are not available, the transaction will not be further processed.

The credit and debit in cash and securities takes place at the same time and any failure leads to a pending operation that will be recycled, according to the system rules.

Euronext Securities Porto uses the T2S platform for real time settlement.

In case of settlement in non-euro currency the foreign currency payment system operated by Caixa Geral de Depósitos, S.A., is used instead of Target 2 Securities.

According to the rules and the functioning of the system, settlement will become final when provisional registers on the securities accounts (physical securities) become final, after the information received regarding financial settlement.

G12Q002

How do the CSD's legal, contractual, technical and risk management frameworks ensure that the final settlement of relevant financial instruments eliminates principal risk? What procedures ensure that the final settlement of one obligation occurs if and only if the final settlement of a linked obligation also occurs?

PFMI: Q.12.1.1AGC: n/a

G12Q003

Does the CSD guaranty settlement?

PFMI: Q.12.1.1AGC: 66u.

- No
- Yes
- Not applicable

G12Q004

Please explain how this is accomplished. What are the procedures and safeguards that permit the CSD to guaranty settlement?

PFMI: Q.12.1.1AGC: 66v.

G12Q005

How are the linked obligations settled - on a gross basis (trade by trade) or on a net basis?

PFMI: Q.12.1.2AGC: n/a

On a gross basis (trade by trade).

G12Q006

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.

PFMI: Q.12.1.2 AGC: 48

- Model1  
 Model2  
 Model3  
 Not applicable  
 OTHER:

G12Q007

Please briefly describe your settlement process, including how do your settlement procedures vary from the model chosen above?

PFMI: Q.12.1.3AGC: 48a

Model 1 is used for both OTC settlement and for regulated markets. The transfer of securities and funds is done in the T2S platform.  
 In case of settlement in non-euro currency the foreign currency payment system operated by Caixa Geral de Depósitos, S.A. is used instead of the T2S DCA accounts.

G12Q008

Is the finality of settlement of linked obligations simultaneous?

PFMI: Q.12.1.3AGC: n/a

- Yes  
 No

G12Q009

If not, what is the timing of finality for both obligations? Is the length of time between the blocking and final settlement of both obligations minimised?

PFMI: Q.12.1.3AGC: n/a

G12Q010

Are the cash and security movements simultaneous (i.e. immediately with no time gap)?

PFMI: Q.12.1.3 AGC: 49

- Yes  
 No  
 Not applicable

G12Q011

If cash and security movements are not simultaneous, please indicate the duration of the timing gap

PFMI: Q.12.1.3AGC: 49a

- 1 hour  
 2 hours  
 3 hours  
 4 hours  
 5 hours  
 Overnight  
 2 days  
 Other: For settlement in non-Euro currency Euronext Securities Porto uses the T2S Conditional Securities Delivery (CoSD) functionality.

G12Q012  
filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

### Participant default rules and procedures (PFMI Principle 13)

G13Q001  
Summary narrative for PFMI Principle 13. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P13AGC: n/a

Euronext Securities Porto has in place a "Manual of Insolvency Procedures" ([Euronext Securities Porto](#)) that highlight and list the relevant issues that have to be considered and need to be addressed as well as the procedures to be adopted in case of insolvency of an Euronext Securities Porto participant, namely in a T2S context.

The Manual of Insolvency Procedures addresses the following issues:

- (i) The reception of information by the local authority, in case of insolvency of an Euronext Securities Porto participant;
- (ii) The sharing of information with regulators, market infrastructures, Euronext Securities Porto's participants, other CSDs/NCBs in a T2S context;
- (iii) The decision process within Euronext Securities Porto;
- (iv) The operational procedures to be taken, namely the identification and management of pending transfer orders of the insolvent participant.

Furthermore, and beyond the context of the insolvency of a participant (and the default rules and procedures considered above), Euronext Securities Porto has in place mechanisms to prevent and address settlement fails.

#### A. Measures to prevent settlement fails

- (i) The securities settlement systems managed by Euronext Securities Porto have in place procedures that facilitate the settlement of transactions in financial instruments referred to in article 5(1) of the CSDR on the intended settlement date with a minimum exposure of its participants to counterparty and liquidity risks and a low rate of settlement fails.
- (ii) Euronext Securities Porto also promotes early settlement on the intended settlement date (ISD) through appropriate mechanisms, namely the settlement attempt in the beginning of the business day on ISD that occurs in the Night-time Settlement (NTS) period, that starts at 19:00 WET on the previous calendar day of ISD.
- (iii) Euronext Securities Porto also put in place measures to encourage and incentivise the timely settlement of transactions by its participants and therefore prevent settlement fails, namely:
  - Automated settlement process;
  - Matching and population of settlement instructions;
  - Cancellation facility;
  - Hold and release mechanism;
  - Partial settlement;
  - Partial release;
  - Recycling;
  - Additional facilities and information, as: Allegement; Monitoring tools and reporting; Real-time gross settlement (RTGS) period, that starts after the Night Time Settlement period and a Night Time Settlement period, with two batches (cycles) and several sequences, that starts at 19h00 WET; Technical netting; Optimisation algorithms; Prioritisation; Linked instructions; Auto-collateralisation; Amendment.

#### B. Measures to address settlement fails:

Euronext Securities Porto's rules (Interbolsa Regulation 2/2016), expressly specify the procedures in case of settlement fails.

Euronext Securities Porto complies with the Settlement Discipline regime.

Euronext Securities Porto uses the T2S Penalty Mechanism.

G13Q002  
Do the CSD's rules and procedures clearly define an event of default (both a financial and an operational default of a participant) and the method for identifying a default? How are these events defined?

PFMI: Q.13.1.1AGC: n/a

Yes (see article 283 of the Portuguese Securities Code).

G13Q003  
How do the CSD's rules and procedures address the following key aspects of a participant default: a) the actions that the CSD can take when a default is declared, b) the extent to which the actions are automatic or discretionary, c) changes to normal settlement practices, d) the management of transactions at different stages of processing, e) the expected treatment of proprietary and customer transactions and accounts, f) the probable sequencing of actions, g) the roles, obligations and responsibilities of the various parties, including non-defaulting participants, and h) the existence of other mechanisms that may be activated to contain the impact of a default?

PFMI: Q.13.1.2AGC: n/a

Euronext Securities Porto has an Insolvency Procedures Manual in place, which contains the harmonized procedures adopted by all T2S CSDs and Central Banks related to the insolvency of a CSD/CB participant.

G13Q004

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

PFMI: Q.13.1.2AGC: 77

- Yes
- No
- Not applicable

G13Q005

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

PFMI: Q.13.1.2AGC: 77a

G13Q006

Does the stock exchange have default protections that extend to the CSD, such as the following?

PFMI: Q.13.1.2AGC: 80

- Margin requirements for stock exchange members
- Guaranty fund for stock exchange members
- Financial requirements for stock exchange membership
- No
- Not applicable
- OTHER:

G13Q007

Please explain:

PFMI: Q.13.1.2AGC: 80a

G13Q008

How do the CSD's rules and procedures allow the CSD to promptly use any financial resources that it maintains for covering losses and containing liquidity pressures arising from default, including liquidity facilities?

PFMI: Q.13.1.3AGC: n/a

G13Q009

How do the CSD's rules and procedures address the order in which the financial resources can be used?

PFMI: Q.13.1.4AGC: n/a

G13Q010

Participant Default Protections Resulting from a Participant Failure. If a participant defaults, how is the loss covered? (Choose all that apply?)

PFMI: Q.13.1.4 AGC: 76, 76d

- 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)

G13Q011

Please explain the process:

PFMI: Q.13.1.4AGC: 76a

G13Q012

Please explain the process of how the loss is shared:

PFMI: Q.13.1.4AGC: 76b

- Equally, among participants
- Pro-rata based on participant's volume
- Limited to participants with transactions with failing counterparty

G13Q013

Please explain:

PFMI: Q.13.1.4AGC: 76d

A guaranty fund covers losses of private investors, customers of our participants. Losses are borne by the settlement counterparties that must claim compensation.

G13Q014

How do the CSD's rules and procedures address the replenishment of resources following a default?

PFMI: Q.13.1.5AGC: n/a

G13Q015

Does the CSD's management have internal plans that clearly delineate the roles and responsibilities for addressing a default? What are these plans?

PFMI: Q.13.2.1AGC: n/a

Yes. All relevant aspects related to the treatment of a participant default is expressly referred to in [Euronext Securities Porto's Insolvency Procedures Manual](#)

G13Q016

What type of communication procedures does the CSD have in order to reach in a timely manner all relevant stakeholders, including regulators, supervisors and overseers?

PFMI: Q.13.2.2AGC: n/a

Email, Phone, and [Euronext Securities Porto's website](#)

G13Q017

How frequently are the internal plans to address a default reviewed? What is the governance arrangement around these plans?

PFMI: Q.13.2.3AGC: n/a

On an annual basis

G13Q018

How are the key aspects of the CSD's participant default rules and procedures made publicly available? How do they address: a) the circumstances in which action may be taken, b) who may take those actions, c) the scope of the actions which may be taken, including the treatment of both proprietary and customer positions, funds and assets, d) the mechanisms to address an CSD's obligations to non-defaulting participants, and e) where direct relationships exist with participants' customers, the mechanisms to help address the defaulting participant's obligations to its customers?

PFMI: Q.13.3.1AGC: n/a

In [Euronext Securities Porto's rules](#) and in [Euronext Securities Porto's website](#) ([Euronext Securities Porto](#)).

G13Q019

How does the CSD engage with its participants and other relevant stakeholders in the testing and review of its participant default procedures? How frequently does it conduct such tests and reviews? How are these tests results used? To what extent are the results shared with the board, risk committee and relevant authorities?

PFMI: Q.13.4.1AGC: n/a

Euronext Securities Porto tested with T2S platform and the Portuguese Central Bank the procedures in place to address an insolvency of a CSD participant and of a Central Bank participant. Annually Euronext Securities Porto conducts insolvency tests with the market.

G13Q020

What range of potential participant default scenarios and procedures do these tests cover? To what extent does the CSD test the implementation of the resolution regime for its participants?

PFMI: Q.13.4.2AGC: n/a

The relevant scenarios are covered.

G13Q021

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

#### General business risk (PFMI Principle 15)

G14Q001

Summary narrative for PFMI Principle 15. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P15AGC: n/a

The primary purpose of the core business of Euronext Securities Porto is to manage the securities settlement systems and centralized securities systems and to contribute to the proper functioning and development of the Portuguese capital market, creating competitive conditions, reducing systemic risks and helping to ensure the protection of the rights of all those who act (directly or indirectly) in the market. As such, if Euronext Securities Porto is not capable of executing this service, its business is at risk.

To mitigate risks inherent to the systems managed by Euronext Securities Porto and thus to the business, Euronext Securities Porto has in place rules, contained in regulations, circulars and notices, in which the procedures governing the centralized securities systems and the securities settlement systems are identified and described. Likewise, in order to make its procedures and activities transparent, Euronext Securities Porto has available in its Portal ([Porto1.euronext.com](http://Porto1.euronext.com)) all the rules in force, as well as operational manuals.

In terms of risk control, Euronext Securities Porto pursues the objective of providing settlement, registration, deposit and securities custody services, adopting a strategy based on the continuous improvement of its products and services, choosing the international standards and best practices according to the needs of its Clients.

Euronext Securities Porto provides its clients with high quality services and has infrastructures that respond in an efficient, safe and reliable way to the needs of the market, thus minimizing the operational and systemic risks inherent to its activity.

Euronext Securities Porto has capital requirements for operational, legal and custody risks, investment risks, business risks and for winding-down or restructuring its activities calculated according to article 47 of the Regulation (EU) 909/2014 of the European Parliament and of the Council of 23 July 2014 (CSD Regulation or CSDR) and articles 3 to 7 of the Commission Delegated Regulation (EU) 2017/390 (the RTS).

Euronext Securities Porto has plans to ensure the orderly winding-down or restructuring of its operations and services where Euronext Securities Porto is unable to raise new capital and also has plans for raising of additional capital in its equity capital approach or falling below the requirements laid down in paragraph 1 of article 47 of the Regulation (EU) 909/2014

Euronext Securities Porto has financial audit performed twice a year by KPMG & Associados – SROC, S.A.

G14Q002

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

PFMI: Q.17.2.3AGC: 15

Yes

No

G14Q003

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

PFMI: n/aAGC: 15a.

KPMG & Associados – SROC, S.A.

G14Q004

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

PFMI: n/aAGC: 15b.

30/06/2025

G14Q005

Please list the period that the audit covered:

PFMI: n/a AGC: 15c.

Start date: 01/01/2025

End date: 30/06/2025

G14Q006

How frequently does the financial audit occur?

PFMI: n/aAGC: 15d.

- Two or more times a year
- Annually
- Less than annually

G14Q007

If less than annually, please explain:

PFMI: n/aAGC: 15e.

G14Q008

Please select the statement that most accurately characterizes the results of the last financial audit:

PFMI: n/aAGC: 15g.

- No material exceptions found.
- Minor exceptions found.
- Material exceptions found.

G14Q009

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

PFMI: n/aAGC: 15h.

G14Q010

Has there been any material loss by the CSD during the past three years?

PFMI: n/aAGC: 86

- Yes
- No
- Not applicable

G14Q011

If there has been a loss, please describe the cause, the final impact and the action taken to prevent a recurrence:

PFMI: n/aAGC: 86a.

G14Q012  
 Has the CSD been subject to any litigation involving a participant during the past three years?  
 PFMI: n/aAGC: 87

- Yes
- No
- Not applicable

G14Q013  
 Please explain the circumstances and resolution:  
 PFMI: n/aAGC: 87a.

G14Q014  
 Has the CSD realized revenues sufficient to cover expenses during the past three years?  
 PFMI: n/a AGC: 88, 88a

- 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

G14Q015  
 Has any participant suffered any losses in the past three years due to the CSD's performance?  
 PFMI: n/a AGC: 30, 30m

- Yes
- No
- Not applicable

G14Q016  
 If yes, please select all of the following in which loss has occurred. You will be prompted to enter the number of instances and total loss in USD thereafter.  
 PFMI: n/a AGC: 30a, 30j

- Corporate Action
- Settlement Process - Securities
- Settlement Process - Cash
- System Outage
- OTHER:

G14Q017  
 Corporate Action. Please specify number of instances:  
 PFMI: n/aAGC: 30b.

G14Q018  
 Corporate Action. Please specify total loss in USD:  
 PFMI: n/aAGC: 30c.

G14Q019  
Settlement Process - Securities. Please specify number of instances:

PFMI: n/aAGC: 30d.

G14Q020  
Settlement Process - Securities. Please specify total loss in USD:

PFMI: n/aAGC: 30e.

G14Q021  
Settlement Process - Cash. Please specify number of instances:

PFMI: n/aAGC: 30f.

G14Q022  
Settlement Process - Cash. Please specify total loss in USD:

PFMI: n/aAGC: 30g.

G14Q023  
System Outage. Please specify number of instances:

PFMI: n/aAGC: 30h.

G14Q024  
System Outage. Please specify total loss in USD:

PFMI: n/aAGC: 30i.

G14Q025  
For Other, please specify number of instances:

PFMI: n/aAGC: 30k.

G14Q026  
For Other, please specify total loss in USD:

PFMI: n/aAGC: 30l.

G14Q027  
How does the CSD identify its general business risks? What general business risks has the CSD identified?

PFMI: Q.15.1.1AGC: n/a

The primary purpose of the core business of Euronext Securities Porto is to manage the securities settlement systems and centralized securities systems and to contribute to the proper functioning and development of the Portuguese capital market, creating competitive conditions, reducing systemic risks and helping to ensure the protection of the rights of all those who act (directly or indirectly) in the market. As such, if Euronext Securities Porto is not capable of executing this service, its business is at risk.

G14Q028  
How does the CSD monitor and manage its general business risks on an ongoing basis? Does the CSD's business risk assessment consider the potential effects on its cash flow and (in the case of a privately operated CSD? capital?

PFMI: Q.15.1.2AGC: n/a

To mitigate risks inherent to the systems managed by Euronext Securities Porto and thus to the business, Euronext Securities Porto has in place rules, contained in regulations, circulars and notices, in which the procedures governing the centralized securities systems and the securities settlement systems are identified and described. Likewise, in order to make its procedures and activities transparent, Euronext Securities Porto has available in its Portal ([Porto | euronext.com](http://Porto.euronext.com)) all the rules in force, as well as, operational manuals.

At the IT level, there are several controls and security procedures that aim to protect the systems managed by Euronext Securities Porto.

In terms of risk control, Euronext Securities Porto pursues the objective of providing settlement, registration, deposit and securities custody services, adopting a strategy based on the continuous improvement of its products and services, choosing the international standards and best practices according to the needs of its Clients.

Euronext Securities Porto provides its clients with high quality services and has infrastructures that respond in an efficient, safe and reliable way to the needs of the market, thus minimizing the operational and systemic risks inherent to its activity.

G14Q029

Does the CSD hold liquid net assets funded by equity so that it can continue operations and services as a going concern if it incurs general business losses?

PFMI: Q.15.2.1AGC: n/a

Yes

G14Q030

Does the CSD maintain a reserve for operating losses?

PFMI: Q.15.2.1 AGC: 89, 89b

 Yes No Not applicable

G14Q031

How does the CSD calculate the amount of liquid net assets funded by equity to cover its general business risks?

PFMI: Q.15.2.2AGC: n/a

The business risks amount is calculated in accordance with Article 6 of the Commission Delegated Regulation (EU) 2017/390;

G14Q032

How does the CSD determine the length of time and associated operating costs of achieving a recovery or orderly wind-down of critical operations and services?

PFMI: Q.15.2.2AGC: n/a

The winding-down or restructuring activities are calculated in accordance with Article 7 of the Commission Delegated Regulation (EU) 2017/390.

G14Q033

Please describe and indicate reserve (for operating losses) amount:

PFMI: Q.15.2.2AGC: 89a.

G14Q034

Has the CSD developed a plan to achieve a recovery or orderly wind-down, as appropriate?

PFMI: Q.15.3.1aAGC: n/a

 Yes No

G14Q035

If yes, what does this plan take into consideration (for example, the operational, technological and legal requirements for participants to establish and move to an alternative arrangement)?

PFMI: Q.15.3.1bAGC: n/a

G14Q036

What amount of liquid net assets funded by equity is the CSD holding for purposes of implementing this plan? How does the CSD determine whether this amount is sufficient for such implementation? Is this amount at a minimum equal to six months of the CSD's current operating expenses?

PFMI: Q.15.3.2AGC: n/a

Euronext Securities Porto estimates a time span of six months for winding down or restructuring its activities.

G14Q037

How are the resources designated to cover business risks and losses separated from resources designated to cover participant defaults or other risks covered under the financial resources principles?

PFMI: Q.15.3.3AGC: n/a

Resources are separated

G14Q038

Does the CSD include equity held under international risk-based capital standards to cover general business risks?

PFMI: Q.15.3.4AGC: n/a

No

G14Q039

What is the composition of the CSD's liquid net assets funded by equity? How will the CSD convert these assets as needed into cash at little or no loss of value in adverse market conditions?

PFMI: Q.15.4.1AGC: n/a

Euronext Securities Porto business risk is covered by part of Euronext Securities Porto capital, held in liquid net assets

G14Q040

How does the CSD regularly assess the quality and liquidity of its liquid net assets funded by equity to meet its current and projected operating expenses under a range of scenarios, including in adverse market conditions?

PFMI: Q.15.4.2AGC: n/a

Euronext Securities Porto has in place a recovery plan related to capital requirements, which is annually reviewed.

G14Q041

Has the CSD developed a plan to raise additional equity? What are the main features of the CSD's plan to raise additional equity should its equity fall close to or fall below the amount needed?

PFMI: Q.15.5.1AGC: n/a

Yes

G14Q042

How frequently is the plan to raise additional equity reviewed and updated?

PFMI: Q.15.5.2AGC: n/a

On an annual basis

G14Q043

What is the role of the CSD's board (or equivalent) in reviewing and approving the CSD's plan to raise additional equity if needed?

PFMI: Q.15.5.3AGC: n/a

Euronext Securities Porto's General Meeting must approve the increase of capital

G14Q044

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

#### Custody risk (PFMI Principle 16)

G15Q001  
 Summary narrative for PFMI Principle 16. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P16AGC: n/a

Euronext Securities Porto has established a framework of internal control across its business areas and functions. This framework is based on ethical principles, established procedures and training of the key personnel who are responsible for implementing and overseeing it. The Internal control function as a second line of defense, aims at ensuring, in a permanent manner that identified risks are mitigated by controls, that controls are effective, documented and reported and that internal procedures exist and are updated on a regular basis.

G15Q002  
 If the CSD uses custodians, how does the CSD select its custodians? What are the specific selection criteria the CSD uses, including supervision and regulation of these entities? How does the CSD monitor the custodians' adherence to these criteria?

PFMI: Q.16.1.1AGC: n/a

N/A

G15Q003  
 Are there any settlement/operational activities performed by a third party on behalf of the depository for the depository participants?

PFMI: Q.16.1.1 AGC: 29, 29i

Yes (please answer 29a)  
 No

G15Q003A  
 Select all applicable

PFMI: Q.16.1.1 AGC: 29, 29i

Vaulting of physical securities  
 Registration  
 Entitlement processing  
 OTHER:

G15Q004  
 If third parties are employed, please indicate which services they supply:

PFMI: Q.16.1.1AGC: 29a.

Safekeeping of physical certificates and CSD counter services for attending participants in deposit and withdrawal operations

G15Q005  
 If third parties are employed, does the CSD assume liability for losses incurred by participants as a result of the actions/inactions of the third parties?

PFMI: Q.16.1.1AGC: 29b.

Yes  
 No

G15Q006  
 If you acknowledge responsibility, please indicate whether your responsibility is assumed

PFMI: Q.16.1.1 AGC: 29c, 29e.

regardless of whether such loss was caused by any action or inaction of the agent  
 if such loss was caused by the agent's action or inaction and such action or inaction was deemed to be negligence on the part of the agent  
 if such loss was caused by the agent's action or inaction and such action or inaction was deemed to be gross negligence on the part of the agent  
 if the loss was caused by the willful default or other willful conduct on the part of the agent  
 OTHER:

G15Q007

If you acknowledge responsibility for agents, your responsibility is assumed for losses

PFMI: Q.16.1.1 AGC: 29d, 29h.

- without limit
- which are not consequential losses
- subject to a monetary limit not based on insurance limits
- subject to a monetary limit based on insurance limits
- OTHER:

G15Q008

Please specify limit:

PFMI: Q.16.1.1AGC: 29f.

G15Q009

Please specify limit:

PFMI: Q.16.1.1AGC: 29g.

G15Q010

How does the CSD verify that these entities have robust accounting practices, safekeeping procedures, and internal controls that fully protect its and its participants' assets?

PFMI: Q.16.1.2AGC: n/a

The conditions related to the provision of the services are established in the participation rules and in the agreement signed between the parties, and are assessed by Euronext Securities Porto, when necessary.

Periodically, Euronext Securities Porto conducts supervision actions to its participants.

G15Q011

How has the CSD established that it has a sound legal basis to support enforcement of its interest or ownership rights in assets held in custody?

PFMI: Q.16.2.1AGC: n/a

G15Q012

How does the CSD ensure that it has prompt access to its assets, including securities that are held with a custodian in another time zone or legal jurisdiction, in the event of participant default?

PFMI: Q.16.2.2AGC: n/a

G15Q013

How does the CSD evaluate and understand its exposures to its custodian banks? In managing those exposures, how does it take into account the full scope of its relationship with each custodian bank? For instance, does the CSD use multiple custodians for the safekeeping of its assets to diversify exposure to any single custodian? How does the CSD monitor concentration of risk exposures to its custodian banks?

PFMI: Q.16.3.1AGC: n/a

Euronext Securities Porto does not have exposure to custodian banks

G15Q014

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

PFMI: Q.16.3.1AGC: 62

G15Q015

How does the CSD ensure that its investment strategy is consistent with its overall risk management strategy?

PFMI: Q.16.4.1aAGC: n/a

The general investment policy of Euronext Securities Porto is to invest cash surpluses in money market instruments of short maturities and short durations

G15Q016

How and to whom does the CSD disclose its investment strategy?

PFMI: Q.16.4.1bAGC: n/a

The Euronext Securities Porto's investment strategy is disclosed by request to the Regulator.

G15Q017

How does the CSD ensure on an ongoing basis that its investments are secured by, or are claims on, high-quality obligors?

PFMI: Q.16.4.2AGC: n/a

The Euronext Group has implemented policies and procedures designed to measure, manage, monitor and report risk exposures, which are regularly reviewed by the appropriate management and supervisory bodies.

The Euronext Group's central treasury team is responsible with identifying risk exposures and monitoring and managing such risks on a daily basis.

To the extent necessary and permitted by local regulation, the Euronext Group's subsidiaries centralise their cash investments, report their risks and hedge their exposures in coordination with the Group's central treasury team.

G15Q018

How does the CSD consider its overall exposure to an obligor in choosing investments? What investments are subject to limits to avoid concentration of credit risk exposures?

PFMI: Q.16.4.3AGC: n/a

According to the Investment Policy in force all investments are subject to limits to avoid concentration of credit risk exposures

G15Q019

Does the CSD invest participant assets in the participants' own securities or those of its affiliates?

PFMI: Q.16.4.4AGC: n/a

No

G15Q020

How does the CSD ensure that its investments allow for quick liquidation with little, if any, adverse price effect?

PFMI: Q.16.4.5AGC: n/a

The general investment policy of Euronext Securities Porto is to invest cash surpluses in money market instruments of short maturities and short durations

G15Q021

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

#### Operational risk (PFMI Principle 17)

G16Q001

Summary narrative for PFMI Principle 17. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P17AGC: n/a

Euronext Securities Porto has clearly defined internal procedures to identify and manage operational risk. Management and advisory bodies are responsible for risk identification, the review of the risk criteria and parameters, as well as their control and supervision.

G16Q002

What are the CSD's policies and processes for identifying the plausible sources of operational risks? How do the CSD's processes identify plausible sources of operational risks, whether these risks arise from internal sources (for example, the arrangements of the system itself, including human resources), from the CSD's participants or from external sources?

PFMI: Q.17.1.1AGC: n/a

G16Q003

What sources of operational risks has the CSD identified? What single points of failure in its operations has the CSD identified?

PFMI: Q.17.1.2AGC: n/a

The main sources of Euronext Securities Porto's operational risk stem from system failures and errors in operational processes that are not fully automated.

G16Q004

How does the CSD monitor and manage the identified operational risks? Where are these systems, policies, procedures and controls documented?

PFMI: Q.17.1.3AGC: n/a

Euronext Securities Porto has established a framework of internal control across its business areas and functions. This framework is based on ethical principles, established procedures and training of the key personnel who are responsible for implementing and overseeing it. The Internal control function as a second line of defense, aims at ensuring, in a permanent manner that identified risks are mitigated by controls, that controls are effective, documented and reported and that internal procedures exist and are updated on a regular basis.

G16Q005

What policies, processes and controls does the CSD employ that are designed to ensure that operational procedures are implemented appropriately? To what extent do the CSD's systems, policies, processes and controls take into consideration relevant international, national and industry-level operational risk management standards?

PFMI: Q.17.1.4AGC: n/a

Euronext Securities Porto has in place a risk management framework that includes operational risks.

G16Q006

What are the CSD's human resources policies to hire, train and retain qualified personnel, and how do such policies mitigate the effects of high rates of personnel turnover or key-person risk? How do the CSD's human resources and risk management policies address fraud prevention?

PFMI: Q.17.1.5AGC: n/a

Euronext Group as in force a program that aims to retain qualified personnel. Euronext Securities Porto's employees must comply with and enforcing the law, regulations and the Euronext Securities Porto Code of Ethics, including the Euronext Group Policies, in force at any given time

G16Q007

How do the CSD's change management and project management policies and processes mitigate the risks that changes and major projects inadvertently affect the smooth functioning of the system?

PFMI: Q.17.1.6AGC: n/a

To prevent any risk from a major change in the system, Euronext Securities Porto has a Project area responsible for the management of multidisciplinary projects

Before a major project go alive there are a set of internal tests . In case the changes that have impact on clients, external testing with clients is also performed.

G16Q008

How has the board of directors defined the key roles and responsibilities for operational risk management?

PFMI: Q.17.2.1AGC: n/a

The Board of Directors is responsible for ensuring a suitable design and sustainable implementation of Risk Management and internal control across the Company and defines and allocates risk appetite within the Company. This policy supports compliance with regulatory and legal requirements in the jurisdictions in which Euronext operates, provides assurance to the Managing and Supervisory Boards, Regulators and clients, and facilitates operational and strategic

Key roles and responsibilities for operational risk management are well defined by the Board of Directors .

G16Q009

Does the CSD's board explicitly review and endorse the CSD's operational risk management framework? How frequently does the board review and endorse the CSD's operational risk management framework?

PFMI: Q.17.2.2AGC: n/a

On an annual basis

G16Q010

How does the CSD review, audit and test its systems, policies, procedures and controls, including its operational risk management arrangements with participants? How frequently does the CSD conduct these reviews, audits and tests with participants?

PFMI: Q.17.2.3AGC: n/a

Euronext Securities Porto tests its system with participants once a year

G16Q011

Internal Audit. Is an internal audit undertaken in your CSD?

PFMI: Q.17.2.3AGC: 14

 Yes No

G16Q012

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

PFMI: Q.17.2.3AGC: 14a.

Internal audit covers all areas of Euronext Group, except internal audit of Finance.

G16Q013

Please list the date of your last internal audit and the period that the audit covered:

PFMI: Q.17.2.3 AGC: 14b.

Start date: 01/01/2024

End date: 30/06/2024

Audit date:

G16Q014

How frequently does the internal audit occur?

PFMI: Q.17.2.3AGC: 14c.

 Two or more times a year Annually Less than annually

G16Q015

If less than annually, please explain:

PFMI: Q.17.2.3AGC: 14d.

G16Q016

Are the results of the internal audit publicly available?

PFMI: Q.17.2.3AGC: 14e.

 Yes No

G16Q017  
Please select the statement that most accurately characterizes the results of the last internal audit:

PFMI: Q.17.2.3AGC: 14f.

- No material exceptions found.
- Minor exceptions found.
- Material exceptions found.

G16Q018  
If minor or material exceptions were found, what actions were taken? Please describe:

PFMI: Q.17.2.3AGC: 14g.

G16Q019  
To what extent, where relevant, is the CSD's operational risk management framework subject to external audit?

PFMI: Q.17.2.4AGC: n/a

G16Q020  
Is an operational audit performed by an Audit Firm, Regulatory Authority, or other external party?

PFMI: Q.17.2.4AGC: 16

- Yes
- No

G16Q021  
If yes, please state the name(s) of the entity(ies) who perform the operational audit.

PFMI: Q.17.2.4AGC: 16a.

G16Q022  
Please list the date of your last operational audit performed by an Audit Firm, Regulatory Authority, or other external party:

PFMI: Q.17.2.4AGC: 16b.

G16Q023  
Please list the period that the audit covered:

PFMI: Q.17.2.4 AGC: 16c.

Start date:  
End date:

G16Q024  
How frequently does the operational audit occur?

PFMI: Q.17.2.4AGC: 16d.

- Two or more times a year
- Annually
- Less than annually

G16Q025  
If less than annually, please explain:

PFMI: Q.17.2.4AGC: 16e.

<p>G16Q026 Please select the statement that most accurately characterizes the results of the last operational audit:</p> <p>PFMI: Q.17.2.4AGC: 16g.</p>
<p><input type="radio"/> No material exceptions found.</p> <p><input type="radio"/> Minor exceptions found.</p> <p><input type="radio"/> Material exceptions found.</p>
<p>G16Q027 If minor or material exceptions were found, what actions were taken? Please describe:</p> <p>PFMI: Q.17.2.4AGC: 16h.</p>
<p>G16Q028 What are the CSD's operational reliability objectives, both qualitative and quantitative? Where and how are they documented?</p> <p>PFMI: Q.17.3.1AGC: n/a</p>
<p>G16Q029 How do these objectives ensure a high degree of operational reliability?</p> <p>PFMI: Q.17.3.2AGC: n/a</p>
<p>G16Q030 What are the policies in place that are designed to achieve the CSD's operational reliability objectives to ensure that the CSD takes appropriate action as needed?</p> <p>PFMI: Q.17.3.3AGC: n/a</p>
<p>G16Q031 How does the CSD review, audit and test the scalability and adequacy of its capacity to handle, at a minimum, projected stress volumes? How frequently does the CSD conduct these reviews, audits and tests?</p> <p>PFMI: Q.17.4.1AGC: n/a</p>
<p>G16Q032 How are situations where operational capacity is neared or exceeded addressed?</p> <p>PFMI: Q.17.4.2AGC: n/a</p>
<p>G16Q033 What are the CSD's policies and processes, including change management and project management policies and processes, for addressing the plausible sources of physical vulnerabilities and threats on an ongoing basis?</p> <p>PFMI: Q.17.5.1AGC: n/a</p>
<p>G16Q034 How is access to the physical building controlled?</p> <p>PFMI: Q.17.5.1AGC: 74</p>
<p><input checked="" type="checkbox"/> By guards</p> <p><input checked="" type="checkbox"/> By electronic keys</p> <p><input checked="" type="checkbox"/> personal ID card</p> <p><input checked="" type="checkbox"/> By alarm system</p> <p><input checked="" type="checkbox"/> OTHER: CCTV surveillance, access control system and tourniquetes</p>

G16Q035  
Please explain:

PFMI: Q.17.5.1AGC: 74a.

CCTV surveillance, access control system and tourniquetes

G16Q036  
Do the CSD's policies, processes, controls and testing appropriately take into consideration relevant international, national and industry-level standards for physical security?

PFMI: Q.17.5.2AGC: n/a

Yes, Euronext Securities Porto complies with standards and is audited regularly in this respect.

G16Q037  
What are the CSD's policies and processes, including change management and project management policies and processes, for addressing the plausible sources of information security vulnerabilities and threats on an ongoing basis?

PFMI: Q.17.5.3AGC: n/a

There is a set of change-management processes, including annual review of Business Continuity plan and Recovery Plan.

G16Q038  
Regarding data security: Are passwords used by participants to access their accounts?

PFMI: Q.17.5.3AGC: 71 71a.

Yes

No

Not applicable

G16Q039  
Does each user have a unique user ID?

PFMI: Q.17.5.3AGC: 71c.

Yes

No

Not applicable

G16Q040  
Are passwords regularly changed?

PFMI: Q.17.5.3AGC: 71e.

Yes

No

Not applicable

G16Q041  
How often?

PFMI: Q.17.5.3AGC: 71f.

Annually

G16Q042

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

PFMI: Q.17.5.3AGC: 71h.

- Yes
- No
- Not applicable

G16Q043

How many?

PFMI: Q.17.5.3AGC: 71i.

5 unsuccessful attempts

G16Q044

Do the CSD's policies, processes, controls and testing appropriately take into consideration relevant international, national and industry-level standards for information security?

PFMI: Q.17.5.4AGC: n/a

G16Q045

How and to what extent does the CSD's business continuity plan reflect objectives, policies and procedures that allow for the rapid recovery and timely resumption of critical operations following a wide-scale or major disruption?

PFMI: Q.17.6.1AGC: n/a

Euronext Securities Porto's main commitment in a disaster situation is to protect its employees, assets and the continuity of its business. Euronext Securities Porto has drawn up a Business Continuity Plan and a Disaster Recovery Plan. The recovery point objective (RPO) in all scenarios coincides with the point at which the disruption occurs. The Recovery Time Objective (RTO) in most scenarios is '0' since network, system, connection, etc. redundancies are sufficient to achieve this. In certain instances, the RTO may depend on making certain decisions and manual action, but disruptions will not exceed two hours for critical services, but in wide-scale or major disruption disruptions the Recovery Time Objective (RTO) is not exceed two hours for critical services

G16Q046

How and to what extent is the CSD's business continuity plan designed to enable critical IT systems to resume operations within two hours following disruptive events, and to enable the CSD to facilitate or complete settlement by the end of the day even in extreme circumstances?

PFMI: Q.17.6.2AGC: n/a

The recovery point objective (RPO) in all scenarios coincides with the point at which the disruption occurs. The Recovery Time Objective (RTO) in most scenarios is 0 since network, system, connection, etc. redundancies are sufficient to achieve this. In certain instances, the RTO may depend on making certain decisions and manual action, but in wide-scale or major disruptions the Recovery Time Objective (RTO) is not exceed two hours for critical services.

G16Q047

How quickly can the main system be reactivated in the event of an outage?

PFMI: Q.17.6.2AGC: 82

- 1 - 4 hours
- 4 - 8 hours
- 8 - 24 hours
- Longer than 24 hours
- Not applicable

G16Q048

How is the contingency plan designed to ensure that the status of all transactions can be identified in a timely manner, at the time of the disruption, and if there is a possibility of data loss, what are the procedures to deal with such loss (for example, reconciliation with participants or third parties)?

PFMI: Q.17.6.3AGC: n/a

Euronext Securities Porto assumes a RTO=0

G16Q049

How do the CSD's crisis management procedures address the need for effective communications internally and with key external stakeholders and authorities?

PFMI: Q.17.6.4AGC: n/a

The Business Continuity Plan of Euronext Securities Porto describes all communication and stakeholders that need to be informed in case of an incident that does not allow the access of the participants to Euronext Securities Porto's systems

G16Q050

Will the CSD publicly announce any system interruption?

PFMI: Q.17.6.4AGC: 84

- Yes
- No
- Not applicable

G16Q051

To whom will the CSD disclose any system interruptions?

PFMI: Q.17.6.4AGC: 84a.

- To the CSD regulators
- To all direct participants
- To direct and indirect participants
- To the public via the internet
- In the press
- OTHER: To all its participants and to the Regulators

G16Q052

If so, please list webpage address:

PFMI: Q.17.6.4AGC: 84b.

[Porto1.euronext.com](http://Porto1.euronext.com)

G16Q053

If so, please list all publications:

PFMI: Q.17.6.4AGC: 84c.

G16Q054

Please explain:

PFMI: Q.17.6.4AGC: 84d.

To all its participants and to the Regulators

G16Q055

How will the CSD disclose any system interruptions?

PFMI: Q.17.6.4AGC: 84e.

- By e-mail
- By telephone
- Public announcement
- Press release
- OTHER: Through Euronext Securities Porto's web portal accessible through Internet

G16Q056

Please explain:

PFMI: Q.17.6.4AGC: 84f.

Through Euronext Securities Porto's web portal accessible through Internet

G16Q057

How does the CSD's business continuity plan incorporate the use of a secondary site (including ensuring that the secondary site has sufficient resources, capabilities, functionalities and appropriate staffing arrangements)? To what extent is the secondary site located a sufficient geographic distance from the primary site such that it has a distinct risk profile?

PFMI: Q.17.6.5AGC: n/a

There is a secondary site with the necessary capacity and resources to undertake all relevant functions of in the event of a disaster situation. Primary and secondary sites are double connected through different telecommunication providers.

The primary and secondary Data Processing Centers are located in different cities with different risk profile. There is a high-capacity and high-availability multi-fiber interconnection between them, allowing the Asynchronous data replication of the systems.

G16Q058

If a back-up system exists, how quickly can the back-up system be activated in the event of the main system failing?

PFMI: Q.17.6.5AGC: 83

- 1 - 4 hours
- 4 - 8 hours
- 8 - 24 hours
- Longer than 24 hours
- Not applicable

G16Q059

Has the CSD considered alternative arrangements (such as manual, paper-based procedures or other alternatives) to allow the processing of time-critical transactions in extreme circumstances?

PFMI: Q.17.6.6AGC: n/a

The procedures described in the Contingency Plan consider alternative arrangements, i.e. manual entries and paper-based procedures in extreme circumstances.

G16Q060

How are the CSD's business continuity and contingency arrangements reviewed and tested, including with respect to scenarios related to wide-scale and major disruptions? How frequently are these arrangements reviewed and tested?

PFMI: Q.17.6.7AGC: n/a

The Business Contingency Plan is reviewed at least annually or earlier in the event of a change in operations or systems. It includes a detailed inventory of the technical resources (machines, applications and data) involved in the contingency.

G16Q061

How does the review and testing of the CSD's business continuity and contingency arrangements involve the CSD's participants, critical service providers and linked CSD? as relevant? How frequently are the CSD's participants, critical service providers and linked CSD? involved in the review and testing?

PFMI: Q.17.6.8AGC: n/a

Euronext Securities Porto and some of its Customers take part in the Disaster Recovery Tests conducted by the T2S.

T2S was established the months of May and November, every year, to perform the tests.

Euronext Securities Porto also performs tests with Banco de Portugal. Some of the critical services providers are requested to participate in the tests.

G16Q062

**BUSINESS RECOVERY PLAN.** This section is intended to identify key aspects of the CSD'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. Do you have a formal business recovery plan?

PFMI: Q.17.6.8AGC: 81

Yes

No

G16Q063

Does your Business Recovery Plan include:

PFMI: Q.17.6.8 AGC: 81a, 81h.

- Back-up of all computer files
- Off-site data storage
- Back-up files stored and locked
- Off-site operations facility
- Remote working ability
- Digital/electronic signing of documentation
- OTHER:

G16Q064

Please identify the frequency of testing for the following third party:  
- Depository participants/members

PFMI: Q.17.6.8 AGC: 81b part 1.

G16Q064A

Please identify the last date of testing for the following third party:  
- Depository participants/members

PFMI: Q.17.6.8 AGC: 81b part 2.

G16Q065

Please identify the frequency of testing for the following third party:  
- Stock exchange

PFMI: Q.17.6.8 AGC: 81c part 1.

G16Q065A

Please identify the last date of testing for the following third party:  
- Stock exchange

PFMI: Q.17.6.8 AGC: 81c part 2.

G16Q066

Please identify the frequency of testing for the following third party:  
- Central bank

PFMI: Q.17.6.8 AGC: 81d part 1.

G16Q066A

Please identify the last date of testing for the following third party:  
- Central bank

PFMI: Q.17.6.8 AGC: 81d part 2.

G16Q067

Please identify the frequency of testing for the following third party:  
- Local brokers

PFMI: Q.17.6.8 AGC: 81e part 1.

G16Q067A

Please identify the last date of testing for the following third party:  
- Local brokers

PFMI: Q.17.6.8 AGC: 81e part 2.

G16Q068

Please identify the frequency of testing for the following third party:  
- Any other third party

PFMI: Q.17.6.8 AGC: 81f part 1.

G16Q068A

Please identify the last date of testing for the following third party:  
- Any other third party

PFMI: Q.17.6.8 AGC: 81f part 2.

G16Q069

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

PFMI: Q.17.6.8AGC: 85

- Yes
- No
- Not applicable

G16Q070

If yes, how much time was needed to implement the recovery plan?

PFMI: Q.17.6.8AGC: 85a.

- Less than 1 hour
- 1 - 2 hours
- 2 - 4 hours
- Longer than 4 hours

G16Q071

How much time was needed to recover and restore business to normal operations?

PFMI: Q.17.6.8AGC: 85b.

- 1 - 4 hours
- 4 - 8 hours
- 8 - 24 hours
- Longer than 24 hours

G16Q072

What was the impact to the market?

PFMI: Q.17.6.8 AGC: 85c, 85d.

- All securities settlements took place as scheduled on the same day with good value
- All cash settlements took place as scheduled on the same day with good value
- All securities settlements took place one business day late with good value
- All cash settlements took place one business day late with good value
- All securities settlements took place one business day late with value one day late
- All cash settlements took place one business day late with value one day late
- All securities settlements took place more than one business day late
- All cash settlements took place more than one business day late
- As a result of the system failure, all fines and penalties for late settlements were waived
- Even though there was a system failure, all fines and penalties for late settlements were still assessed
- OTHER:

G16Q073

If no or other, please explain

PFMI: Q.17.7.4 AGC: 40a.

G16Q074

What risks has the CSD identified to its operations arising from its key participants, other CSD, and service and utility providers? How and to what extent does the CSD monitor and manage these risks?

PFMI: Q.17.7.1AGC: n/a

Euronext Securities Porto identifies (reviews and keeps the identification up-to-date), on an ongoing basis, the key participants in its securities settlement systems (SSS) based on the transaction volumes and values.

Euronext Securities Porto created a Risk Assessment Questionnaire in order to assess the risk posed to Euronext Securities Porto by its main participants.

Euronext Securities Porto manages the dependencies with critical utilities providers and critical service providers through adequate contractual and organisational arrangements, as well as through specific provisions in its business continuity policy and disaster recovery plan. In case any service provider further sub-contract any elements of the services provided to Euronext Securities Porto, the contractual arrangements foresee a prior approval by Euronext Securities Porto.

Euronext Securities Porto prepared a Risk Assessment Questionnaire and has sent it to its critical service providers in order to assess the risks posed by each of them. This questionnaire was created based in the assessment methodology for the oversight expectations applicable to critical service providers issued by the CPMI – IOSCO (Committee on Payments and Market Infrastructures and the Board of the International Organization of Securities Commissions).

Euronext Securities Porto ensures that its systems and communication arrangements with other CSDs or market infrastructures are reliable, secure and designed to minimise operational risk. Any arrangements with another CSD or another market infrastructure provides that:

(i) The other CSD or other financial market infrastructure discloses to Euronext Securities Porto any critical service provider on which the other CSD or market infrastructure relies;

(ii) The governance arrangements and management processes in the other CSD or other market infrastructure do not affect the smooth provision of services by Euronext Securities Porto, including the risk management arrangements and the non-discriminatory access conditions.

G16Q075

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?

PFMI: Q.17.7.1 AGC: 39

- Yes
- No
- Not applicable

G16Q076

Please explain

PFMI: Q.17.7.1AGC: 39a

G16Q077

If the CSD has outsourced services critical to its operations, how and to what extent does the CSD ensure that the operations of a critical service provider meet the same reliability and contingency requirements they would need to meet if they were provided internally?

PFMI: Q.17.7.2AGC: n/a

The vault for the deposit of physical certificates is outsourced to a commercial bank (except for global certificates). The outsourcing contract specifies the security measures that must be adopted and the reliability and contingency requirements they would need to provide this service to Euronext Securities Porto.

G16Q078

How and to what extent does the CSD identify, monitor and mitigate the risks it may pose to another FMI?

PFMI: Q.17.7.3AGC: n/a

See question 577 [G16Q074]

G16Q079

To what extent does the CSD coordinate its business continuity arrangements with those of other interdependent CSDs?

PFMI: Q.17.7.4 AGC: n/a

See question 577 [G16Q074]

G16Q080

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

PFMI: Q.17.7.4 AGC: 40

- Yes
- No
- Not applicable
- Other

G16Q081

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

#### Access and participation requirements (PFMI Principle 18)

G17Q001

Summary narrative for PFMI Principle 18. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P18AGC: n/a

Interbolsa Regulation 1/2016 defines the terms and conditions of participation to the securities settlement systems and centralised securities systems (abbreviated as Systems) managed by Euronext Securities Porto.

According to article 1 of Interbolsa Regulation 1/2016, can be participants to the securities settlement systems and to the centralised securities system managed by Euronext Securities Porto, generically designated as affiliates or participants, the entities referred in articles 267 and 268 of the Portuguese Securities Code and in article 2 of CMVM Regulation 14/2000.

The affiliation has to be formally requested by the applicant to the Board of Directors of Euronext Securities Porto. The applicant should indicate in the request the type of participation as well as the systems and services they intend to make use of, namely the direct or indirect connection to the TARGET2-Securities platform. Finally, it also has to prove its capacity to fulfil the requisites foreseen in Interbolsa Regulation 1/2016. Those requirements are considered prerequisites for obtaining and maintaining the position of Euronext Securities Porto's affiliate.

Actually, affiliates must immediately notify Euronext Securities Porto if and when they are aware of any circumstance liable to affect the fulfilment of the requirements for access, or its maintenance, as outlined in Interbolsa Regulation 1/2016, or any other obligation inherent in their position as affiliates, without affecting the competency of Euronext Securities Porto to inspect, at any moment, the respective compliance.

G17Q002

What are the CSD's criteria and requirements for participation (such as operational, financial and legal requirements)?

PFMI: Q.18.1.1AGC: n/a

Interbolsa Regulation 1/2016 defines the terms and conditions of participation to the securities settlement systems and centralised securities systems (abbreviated as Systems) managed by Euronext Securities Porto.

G17Q003

Are prospective participants subject to an initial review and approval process regarding compliance with eligibility requirements?

PFMI: Q.18.1.1AGC: 19

- Yes
- No
- Not applicable

G17Q004

How do these criteria and requirements allow for fair and open access to the CSD's services, including by direct and, where relevant, indirect participants and other CSD?, based on reasonable risk-related participation requirements?

PFMI: Q.18.1.2AGC: n/a

The access criteria and requirements identified by Euronext Securities Porto allow for fair and open access to Euronext Securities Porto's Services.

G17Q005

How are the participation requirements for the CSD justified in terms of the safety and efficiency of the CSD and its role in the markets it serves, and tailored to and commensurate with the CSD's specific risks?

PFMI: Q.18.2.1AGC: n/a

The participation requirements to access Euronext Securities Porto's systems were constructed considering the safety and efficiency of Euronext Securities Porto and its role in the Portuguese market.

G17Q006

Are there participation requirements that are not risk-based but required by law or regulation? If so, what are these requirements?

PFMI: Q.18.2.2AGC: n/a

N/A

G17Q007

What governs the relationship between the CSD and the participants?

PFMI: Q.18.2.2AGC: 20

- Relevant law and regulation
- Standard participation contract
- Established terms and conditions of participation
- By-laws of the CSD
- Rules of the CSD
- Not applicable
- OTHER:

G17Q007A

Provide a link to the rulebook.

AGC: 20b

G17Q008  
Please explain:

PFMI: Q.18.2.2AGC: 20a

Interbolsa Regulation 1/2016 defines the terms and conditions for participation to the securities settlement systems and centralised securities systems (abbreviated as Systems) managed by Euronext Securities Porto.  
The admission as participant shall be established by contract containing general conditions previously registered with CMVM and shall be subject to the presentation of a proof of registration with CMVM, when mandatory.

G17Q009  
Are all classes of participants subject to the same access criteria? If not, what is the rationale for the different criteria (for example, size or type of activity, additional requirements for participants that act on behalf of third parties, and additional requirements for participants that are non-regulated entities)?

PFMI: Q.18.2.3AGC: n/a

Yes

G17Q010  
PARTICIPANTS AND PARTICIPATION. The purpose of this section is to understand issues relating to participation in the CSD, including eligibility requirements, conditions of participation, and supervision of participants. What types of entities are eligible to become participants and how many of each type are there currently?

PFMI: Q.18.2.3 AGC: 17, 17q

- Banks
- Brokers
- Individuals
- Foreign Institutions
- Not applicable
- OTHER: 8 entities

G17Q011  
How many Bank participants are there currently? (then please answer 17b)

PFMI: Q.18.2.3AGC: 17a.

33

G17Q012  
Please select the features included in the eligibility requirements for Banks.

PFMI: Q.18.2.3 AGC: 17b, 17d

- Financial Thresholds
- Regulatory Oversight
- Market Experience
- OTHER: Technical capability

G17Q013  
Please explain:

PFMI: Q.18.2.3AGC: 17d.

To be participant in the systems of Euronext Securities Porto the applicant has to be registered or be recognised by the Portuguese regulator (CMVM). Euronext Securities Porto requests technical capability to connect and to communicate with Euronext Securities Porto's systems and operational capability to use the provided services. Eligible entities should also have, being the case, cash account open in the settlement/payment systems (namely a DCA – Dedicated Cash Account in T2S), either directly or indirectly through a third party.

G17Q014  
How many Broker participants are there currently? (then please answer 17f)

PFMI: Q.18.2.3AGC: 17e.

G17Q015

Please select the features included in the eligibility requirements for Brokers.

PFMI: Q.18.2.3 AGC: 17i, 17h

- Financial Thresholds
- Regulatory Oversight
- Market Experience
- OTHER: Technical capability to connect and to communicate with Euronext Securities Porto's systems and operational capability to use the provided services. Eligible entities should also have, being the case, cash account open in the settlement/payment systems (namely a DCA in T2S), either directly or indirectly, and be registered at CMVM, or obtain the necessary and adequate recognition to operate in Portugal.

G17Q016

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

PFMI: Q.18.2.3AGC: 17i.

G17Q017

Please select the features included in the eligibility requirements for Individual participants.

PFMI: Q.18.2.3AGC: 17j.

- Financial Thresholds
- Regulatory Oversight
- Market Experience
- OTHER:

G17Q018

How many Foreign Institution participants are there currently?

PFMI: Q.18.2.3AGC: 17m.

11

G17Q019

Please select the features included in the eligibility requirements for Foreign Institution participants.

PFMI: Q.18.2.3 AGC: 17n, 17p.

- Financial Thresholds
- Regulatory Oversight
- Market Experience
- OTHER: Technical capability to connect and to communicate with Euronext Securities Porto's systems and operational capability to use the provided services. Eligible entities should also have, being the case, cash account open in the settlement/payment systems (namely a DCA in T2S), either directly or indirectly, and be registered at CMVM, or obtain the necessary and adequate recognition to operate in Portugal.

G17Q020

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

PFMI: Q.18.2.3AGC: 17q.

Banco de Portugal (The Portuguese Central Bank);

Agência de Gestão da Tesouraria e da Dívida Pública – IGCP, E.P.E.(the organisation responsible for the management of Portuguese Government debt);

SII - Sistema de Indemnização aos Investidores (investor compensation system managed by CMVM);

CBOE (CCP);

Euronext Clearing (CCP);

OMIClear - Sociedade de Compensação de Mercados de Energia, SGCCCC, S.A.,

Euronext Lisbon – Sociedade Gestora de Mercados Regulamentados, S.A.Euronext Paris, SA;

Clearstream Banking AG (the German CSD);

Iberclear (the Spanish CSD)

G17Q021  
Indicate how many "Other entities" are currently participants?

PFMI: Q.18.2.3AGC: 17r.

9

G17Q022  
Please select the features included in the eligibility requirements for the participants referred to above as "Other entities".

PFMI: Q.18.2.3 AGC: 17s, 17u

Financial Thresholds

Regulatory Oversight

Market Experience

OTHER: Technical capability to connect and to communicate with Euronext Securities Porto's systems and operational capability to use the provided services. Eligible entities should also have, being the case, cash account open in the settlement/payment systems (namely a DCA in T2S), either directly or indirectly (with the exception of SII, Omiclear, Euronext Lisbon and Euronext Paris) and be registered at CMVM, or obtain the necessary and adequate recognition to operate in Portugal.

G17Q023  
How are the access restrictions and requirements reviewed to ensure that they have the least restrictive access that circumstances permit, consistent with maintaining acceptable risk controls? How frequently is this review conducted?

PFMI: Q.18.2.4AGC: n/a

The access criteria is annually assessed

G17Q024  
How are participation criteria, including restrictions in participation, publicly disclosed?

PFMI: Q.18.2.5AGC: n/a

Interbolsa Regulation 1/2016 defines the Participation criteria and is publicly available on Euronext Securities Porto's website.

G17Q025  
Where can a description of the specific eligibility requirements for Bank participants be found?

PFMI: Q.18.2.5AGC: 17c.

Interbolsa Regulation 1/2016 defines the Participation criteria and is publicly available on Euronext Securities Porto's website.

G17Q026  
Where can a description of the specific eligibility requirements for Broker participants be found?

PFMI: Q.18.2.5AGC: 17g.

Interbolsa Regulation 1/2016 defines the Participation criteria and is publicly available on Euronext Securities Porto's website.

G17Q027  
Where can a description of the specific eligibility requirements for Individual participants be found?

PFMI: Q.18.2.5AGC: 17k.

N/A

G17Q028  
Where can a description of the specific eligibility requirements for Foreign Institution participants be found?

PFMI: Q.18.2.5AGC: 17o.

Interbolsa Regulation 1/2016 defines the Participation criteria and is publicly available on Euronext Securities Porto's website.

G17Q029

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

PFMI: Q.18.2.5AGC: 17f.

G17Q030

How does the CSD notify participants of material changes to the conditions of participation?

PFMI: Q.18.2.5AGC: 22

- By e-mail
- By telephone
- By public announcement
- By press release
- Not applicable
- OTHER: All material changes are published in Euronext Securities Porto's Portal accessible through Internet.

G17Q031

Please explain:

PFMI: Q.18.2.5AGC: 22a.

All material amendments/changes are published on Euronext Securities Porto's website. Information is also sent by email.

G17Q032

How does the CSD monitor its participants' ongoing compliance with the access criteria? How are the CSD's policies designed to ensure that the information it uses to monitor compliance with participation criteria is timely and accurate?

PFMI: Q.18.3.1AGC: n/a

Euronext Securities Porto monitors and supervises its participants in compliance with the access criteria.

G17Q033

Who enforces compliance with the CSD's conditions of participation?

PFMI: Q.18.3.1AGC: 23

- The CSD
- The exchange
- The CSD's regulator
- Not applicable
- OTHER: Banco de Portugal (the Portuguese Central Bank)

G17Q034

Please explain:

PFMI: Q.18.3.1AGC: 23a

Banco de Portugal (the Portuguese Central Bank)

G17Q035  
 Does the depository have forms of oversight management for assessing and monitoring of the following? (Choose all that apply.)

PFMI: Q.18.3.1 AGC: 79

- Participant eligibility requirements
- Participant volumes
- Participant financial strength
- Other loss or default protections the CSD maintains
- Collateral requirements for participants
- Debit caps for participants
- Settlement controls that minimize or eliminate the risk of default by a participant
- Blocking of securities movement before receipt of payment
- Blocking payment until securities are moved
- Not applicable (please answer follow up question)
- OTHER:

G17Q035A  
 Please provide the risk management framework (it can be a link or attachment at the end of this section)

PFMI: Q.18.3.1 AGC: 79

G17Q036  
 Please explain other loss or default protections:

PFMI: Q.18.3.1AGC: 79a

G17Q037  
 Please explain the requirements:

PFMI: Q.18.3.1AGC: 79b

G17Q038  
 Please explain how these debit caps work:

PFMI: Q.18.3.1AGC: 79c

G17Q039  
 What type or types of settlement controls

PFMI: Q.18.3.1AGC: 79d.

- Blocking or freezing of securities positions
- Controlling DVP settlement
- Simultaneous DVP
- OTHER:

G17Q040  
 Please explain:

PFMI: Q.18.3.1AGC: 79e.

G17Q041  
 Please explain:

PFMI: Q.18.3.1AGC: 79f.

Buyer can use the securities after successful payment. If payment is not made the securities remain in the seller's account available for use.

G17Q042  
Please explain:

PFMI: Q.18.3.1AGC: 79g.

Securities transfer is linked with the payment as both are carried out in the same system.

G17Q043  
Please identify and explain:

PFMI: Q.18.3.1AGC: 79h

G17Q044  
Please explain briefly how these work:

PFMI: Q.18.3.1AGC: 79i

G17Q045  
What are the CSD's policies for conducting enhanced surveillance of, or imposing additional controls on, a participant whose risk profile deteriorates?

PFMI: Q.18.3.2AGC: n/a

Interbolsa's Regulation 1/2016 contains the relevant matters related to participants access, surveillance and additional controls.

G17Q046  
What are the CSD's procedures for managing the suspension and orderly exit of a participant that breaches, or no longer meets, the participation requirements?

PFMI: Q.18.3.3AGC: n/a

The procedures for managing the suspension and orderly exit of a participant are contained in Interbolsa's Regulation 1/2016 .

G17Q047  
What enforcement actions are available to the enforcement authority?

PFMI: Q.18.3.3AGC: 24

- Fines
- Restrictions on participation
- Suspension of participation
- Termination of participation
- Not applicable
- OTHER:

G17Q048  
Please explain:

PFMI: Q.18.3.3AGC: 24a

G17Q049  
Has there been any such enforcement actions in the last three years?

PFMI: Q.18.3.3AGC: 25

- Yes
- No

G17Q050

If yes, please explain, including information relative to any suspensions of CSD participants:

PFMI: Q.18.3.3AGC: 25a.

G17Q051

How are the CSD's procedures for managing the suspension and orderly exit of a participant disclosed to the public?

PFMI: Q.18.3.4AGC: n/a

Through Euronext Securities Porto' website

G17Q052

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

### Tiered participation (PFMI Principle 19)

G18Q001

Summary narrative for PFMI Principle 19. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P19AGC: n/a

Euronext Securities Porto does not organize tiered participation arrangements in its systems. Contractual relationships exist only with direct participants. Euronext Securities Porto allows its participants to open as much securities accounts as they need in order to provide segregation to its clients.

Nevertheless, Euronext Securities Porto can assess material dependencies between direct participants and participants' clients, where the clients are known to Euronext Securities Porto. In this case, Euronext Securities Porto conducts a risk exercise in order to identify the participants' clients that are known to Euronext Securities Porto whose transactions, based on their volumes and values, are significant in relation to the respective participant's risk management capacity.

G18Q002

Does the CSD have any tiered participation arrangements? If so, describe these arrangements.

PFMI: Q.19.1.1AGC: n/a

G18Q003

How does the CSD gather basic information about indirect participation? Which information is collected and how frequently is it updated?

PFMI: Q.19.1.2AGC: n/a

G18Q004

How does the CSD evaluate its risks arising from these arrangements?

PFMI: Q.19.1.3AGC: n/a

G18Q005

What material risks to the CSD arising from tiered participation arrangements has the CSD identified? How has it mitigated these risks?

PFMI: Q.19.1.4AGC: n/a

G18Q006

How does the CSD identify material dependencies between direct and indirect participants that might affect the CSD?

PFMI: Q.19.2.1AGC: n/a

G18Q007

Has the CSD identified (a) the proportion of activity that each direct participant conducts on behalf of indirect participants in relation to the direct participants' capacity, (b) direct participants that act on behalf of a material number of indirect participants, (c) indirect participants responsible for a significant proportion of turnover in the system, and (d) indirect participants whose transaction volumes or values are large relative to the capacity of the direct participant through which they access the CSD to manage risks arising from these transactions?

PFMI: Q.19.3.1AGC: n/a

G18Q008

What risks to the CSD arise, and how does the CSD manage these risks arising from key indirect participants?

PFMI: Q.19.3.2AGC: n/a

G18Q009

What are the CSD's policies for reviewing its rules and procedures in order to mitigate risks to the CSD arising from tiered participation? How frequently is this review conducted?

PFMI: Q.19.4.1AGC: n/a

G18Q010

What criteria does the CSD use to determine when mitigating actions are required? How does the CSD monitor and mitigate its risks?

PFMI: Q.19.4.2AGC: n/a

G18Q011

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

#### Links (PFMI Principle 20)

G19Q001

Summary narrative for PFMI Principle 20. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P20AGC: n/a

Euronext Securities Porto (as Investor CSD) has CSD links established with Euroclear France and Euroclear Nederland, and Clearstream Banking AG (CBF) in T2S. Euronext Securities Porto also established a relayed link with NBB-SSS, through the link with Euroclear France. With these links Euronext Securities Porto allows its participants to hold in their securities accounts debt instruments originally registered at the referred CSDs, that are eligible as collateral by the ECB and tax exempted.

Euronext Securities Porto has an Issuer CSD link with Iberclear and with Clearstream Banking AG (CBF).

LuxCSD, has an Investor relayed CSD link, with Euronext Securities Porto through CBF

The ICSDs have indirect links with the Portuguese market (Euronext Securities Porto as issuer CSD) through custody arrangements with custodians which are participants in Euronext Securities Porto's systems.

G19Q002

What process is used to identify potential sources of risk (such as, legal, credit, liquidity, custody and operational risks) arising from prospective links? How does this affect the CSD's decision whether to establish the link?

PFMI: Q.20.1.1AGC: n/a

G19Q003

What links have been established with other CSD? How does the CSD identify, monitor and manage the risks arising from an established link on an ongoing basis?

PFMI: Q.20.1.2AGC: n/a

Euronext Securities Porto (as Investor CSD) has CSD links with Euroclear France and Euroclear Nederland, and Clearstream Banking AG (CBF) in T2S. Euronext Securities Porto also established a relayed link with NBB-SSS, through the link with Euroclear France.

Euronext Securities Porto has an Issuer CSD link with Iberclear and with Clearstream Banking AG (CBF).

LuxCSD has an Investor relayed CSD link, with Euronext Securities Porto through CBF.

G19Q004

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).

PFMI: Q.20.1.2 AGC: 38

There are 3 direct investor-CSD links set up with Euroclear France and Euroclear Nederland and Clearstream Banking AG (CBF) which currently are used only for ECB eligible debt instruments.

Euronext Securities Porto has a relayed investor-CSD link set up with NBB-SSS, through Euroclear France, also for ECB eligible debt instruments.

Euronext Securities Porto has Issuer CSD links with Iberclear and CBF LuxCSD has an Investor relayed CSD link, with Euronext Securities Porto through CBF.

G19Q005

How does the CSD ensure that link arrangements are designed so that it is able to remain observant of the other principles? How frequently is this analysis conducted?

PFMI: Q.20.1.3AGC: n/a

G19Q006

In which jurisdictions has the CSD established links? What are the relevant legal frameworks supporting the established links?

PFMI: Q.20.2.1AGC: n/a

G19Q007

How does the CSD ensure that its links have a well founded legal basis that support its design and provide it with adequate protection in all relevant jurisdictions? How does the CSD ensure that such protections are maintained over time?

PFMI: Q.20.2.2AGC: n/a

G19Q008

What processes are in place to measure, monitor and manage credit and liquidity risks arising from any established links?

PFMI: Q.20.3.1AGC: n/a

G19Q009

If a CSD extends credit to a linked CSD, what processes exist to ensure that credit extensions to the linked CSD are fully covered by high-quality collateral and that credit limits are appropriate?

PFMI: Q.20.3.2AGC: n/a

G19Q010

Are provisional transfers of securities allowed across the link? If so, what arrangements make provisional transfers necessary, and is the retransfer of these securities prohibited until the first transfer is final?

PFMI: Q.20.4.1AGC: n/a

G19Q011

For any established link, how has the investor CSD determined that the rights of its participants have a high level of protection?

PFMI: Q.20.5.1AGC: n/a

Euronext Securities Porto ensures that the foreign CSD with which it holds the securities offers a sound asset protection regime through the signed agreements and its terms and conditions.

G19Q012

How frequently is reconciliation of holdings conducted by the entities holding the securities in custody?

PFMI: Q.20.5.2AGC: n/a

On a daily basis.

G19Q013

How does the investor CSD provide a high-level of protection for the rights of its participants (including segregation and portability arrangements and asset protection provisions for omnibus accounts)?

PFMI: Q.20.5.3AGC: n/a

G19Q014

If the CSD uses an intermediary to operate a link, what are the criteria used by the CSD to select the intermediary or intermediaries? Are these criteria risk-based?

PFMI: Q.20.6.1AGC: n/a

G19Q015

What are the respective liabilities of the two linked CSDs and the intermediaries?

PFMI: Q.20.6.2AGC: n/a

G19Q016

What processes exist to measure, monitor and manage the risks arising from use of the intermediary?

PFMI: Q.20.6.3AGC: n/a

G19Q017

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

### Efficiency and effectiveness (PFMI Principle 21)

G20Q001

Summary narrative for PFMI Principle 21. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P21AGC: n/a

Euronext Securities Porto has in place a Users Committee.

Euronext Securities Porto performs annually a client satisfaction survey, led by an independent entity

The objectives of Euronext Securities Porto as far as the effectiveness of its operations is concerned are :

- \* To provide infrastructures and highest quality services to all participants of the securities market, namely to the financial intermediaries and issuer companies, that will fulfil all the needs of the market with efficiency, safety and confidence;
- \* To render services for settlement, issue registration, deposit and safekeeping of securities according to the best international practices;
- \* To follow a strategy focused in the continuous improvement of its products and services according to the customers' needs;
- \* To engage continuously with rigor and professionalism in the development and efficiency of the capital market, namely in what concerns the areas of settlement and custody;
- \* To contribute to the development of the capital market by creating competitive conditions, reducing systemic risks and protecting the rights of the investors and other entities involved with the capital market.

G20Q002

How does the CSD determine whether its design (including its clearing and settlement arrangement, its operating structure, its delivery systems and technologies, and its individual services and products) is taking into account the needs of its participants and the markets it serves?

PFMI: Q.21.1.1AGC: n/a

Euronext Securities Porto has in place a User Committee.

G20Q003

How does the CSD determine whether it is meeting the requirements and needs of its participants and other users and continues to meet those requirements as they change (for example, through the use of feedback mechanisms)?

PFMI: Q.21.1.2AGC: n/a

Euronext Securities Porto performs annually a client satisfaction survey, led by an independent entity

G20Q004

What are the CSD's goals and objectives as far as the effectiveness of its operations is concerned?

PFMI: Q.21.2.1AGC: n/a

The objectives of Euronext Securities Porto are:

- \* To provide infrastructures and highest quality services to all participants of the securities market, namely to the financial intermediaries and issuer companies, that will fulfil all the needs of the market with efficiency, safety and confidence;
- \* To render services for settlement, issue registration, deposit and safekeeping of securities according to the best international practices;
- \* To follow a strategy focused in the continuous improvement of its products and services according to the customers' needs;
- \* To engage continuously with rigor and professionalism in the development and efficiency of the capital market, namely in what concerns the areas of settlement and custody;
- \* To contribute to the development of the capital market by creating competitive conditions, reducing systemic risks and protecting the rights of the investors and other entities involved with the capital market.

G20Q005

How does the CSD ensure that it has clearly defined goals and objectives that are measurable and achievable?

PFMI: Q.21.2.2AGC: n/a

G20Q006

To what extent have the goals and objectives been achieved? What mechanisms does the CSD have to measure and assess this?

PFMI: Q.21.2.3AGC: n/a

G20Q007

What processes and metrics does the CSD use to evaluate its efficiency and effectiveness?

PFMI: Q.21.3.1AGC: n/a

G20Q008

How frequently does the CSD evaluate its efficiency and effectiveness?

PFMI: Q.21.3.2AGC: n/a

G20Q009

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

#### Communication (PFMI Principle 22)

G21Q001  
 Summary narrative for PFMI Principle 22. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P22AGC: n/a

The communication between Euronext Securities Porto and its affiliates are done either through SWIFT or through STD – Sistema de Transferência de Dados (Data Transfer System). For core settlement systems Euronext Securities Porto has SWIFT messages according to ISO 15022 or 20222 standards and following international standards. SWIFT ISO 20022 messages are used in the communication with T2S and SWIFT ISO 15022 messages are available to all participants, but it is not mandatory. Euronext Securities Porto has developed and provides to its participants a proprietary channel for the communication with its participants: the STD. STD is a software application made accessible to the participants by Euronext Securities Porto, which enables data transfer between users and Euronext Securities Porto, through messages and files. The adopted proprietary message structure was designed to be compatible and convertible to ISO messages. A message conversion prototype was developed to ease up the change to ISO 15022 messages via a straight-through-processing. The two channels, SWIFT and STD, are compatible - the information received from the participants is stored in the same format and in the same databases, regardless of the input channel used; the information sent to the participants has a common origin, regardless of the output channel selected. Therefore, Euronext Securities Porto uses in its communication with participants and market infrastructures "international open communication procedures and standards", according to the requirements established in article 35 of the CSDR. In what refers to the communication between the non-euro currency settlement system managed by Euronext Securities Porto, this is processed through STD, according to the connection agreement signed between Euronext Securities Porto and Caixa Geral de Depósitos, S.A. (as the operator of the SPME – Non-Euro Payment System)

G21Q002  
 Does the CSD use an internationally accepted communications procedure and, if so, which one(s)? If not, how does the CSD accommodate internationally accepted communication procedures?

PFMI: Q.22.1.1AGC: n/a

Yes, ISO standards

G21Q003  
 Security Control. How do participants receive information (view actual settlement of trades, movement of securities on their accounts, etc.) and see the status of their accounts?

PFMI: Q.22.1.1AGC: 69

By direct electronic link  
 By receipt of physical account holding statements  
 Not applicable  
 OTHER:

G21Q004  
 Please explain:

PFMI: Q.22.1.1AGC: 69a.

G21Q005  
 Do participants have access to affect their holdings, including confirming and affirming trades, movement of securities on their accounts, etc.?

PFMI: Q.22.1.1AGC: 70

Yes  
 No  
 Not applicable

G21Q006  
 How is access given to participants?

PFMI: Q.22.1.1AGC: 70a.

By direct electronic link  
 OTHER:

G21Q007  
Please select type of electronic link:  
  
PFMI: Q.22.1.1AGC: 70b.

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

G21Q008  
Please explain:  
  
PFMI: Q.22.1.1AGC: 70c.

G21Q009  
Does the CSD communicate with other market entities such as stock exchanges, payment systems, clearing houses, etc., by secured linkages?  
  
PFMI: Q.22.1.1AGC: 72

- Yes
- No
- Not applicable

G21Q010  
Please explain:  
  
PFMI: Q.22.1.1AGC: 72a

Private communication network and SWIFT communications network.

G21Q011  
How does the CSD communicate with Stock Exchanges?  
  
PFMI: Q.22.1.1 AGC: 73 73a

- Dial-up modem
- Secured, leased, dedicated telephone line
- Internet
- Fax
- Paper
- other
- Not applicable
- OTHER:

G21Q012  
How does the CSD communicate with Payment Systems?  
  
PFMI: Q.22.1.1 AGC: 73b

- Dial-up modem
- Secured, leased, dedicated telephone line
- Internet
- Fax
- Paper
- other
- Not applicable
- OTHER:

G21Q013  
 How does the CSD communicate with Clearing Houses?  
 PFMI: Q.22.1.1 AGC: 73c

- Dial-up modem
- Secured, leased, dedicated telephone line
- Internet
- Fax
- Paper
- other
- Not applicable
- OTHER:

G21Q014  
 How does the CSD communicate with Registrars?  
 PFMI: Q.22.1.1 AGC: 73d

- Dial-up modem
- Secured, leased, dedicated telephone line
- Internet
- Fax
- Paper
- other
- Not applicable
- OTHER:

G21Q015  
 If the CSD engages in cross-border operations, how do the CSD's operational procedures, processes and systems use or otherwise accommodate internationally accepted communication procedures for cross-border operations?  
 PFMI: Q.22.1.2AGC: n/a

Euronext Securities Porto uses ISO 20022 messages to communicate with T2S for the settlement of cross-border operations and ISO 15022/ISO 20022 messages for Corporate Actions.

G21Q016  
 Does the CSD use an internationally accepted communications standard and, if so, which one(s)? If not, how does the CSD accommodate internationally accepted communication standards?  
 PFMI: Q.22.1.3AGC: n/a

Yes, ISO standards

G21Q017  
 If the CSD engages in cross-border operations, how do the CSD's operational procedures, processes and systems use or otherwise accommodate internationally accepted communication standards for cross-border operations?  
 PFMI: Q.22.1.4AGC: n/a

G21Q018  
 If no international standard is used, how does the CSD accommodate systems that translate or convert message format and data from international standards into the domestic equivalent and vice versa?  
 PFMI: Q.22.1.5AGC: n/a

G21Q019  
 filecount - Add relevant appendices for this group.  
 PFMI: n/a AGC: n/a

**Transparency and disclosure (PFMI Principle 23)**

G22Q001

Summary narrative for PFMI Principle 23. Please provide a summary narrative disclosure with sufficient detail and context, as well as any other appropriate supplementary information, to enable readers to understand the CSD's approach to or method for observing the principle. Please use the following questions as guidance for the points of focus and level of detail it is expected to convey in the disclosure. Cross references to publicly available documents should be included, where relevant, to supplement the discussion.)

PFMI: Annex A - CSD disclosure template - IV.P23AGC: n/a

Euronext Securities Porto's rules and procedures are included, respectively, in Regulations /Circulars/Instruction/Notices and in Manuals. These documents are publicly available on Euronext Securities Porto's website.

Euronext Securities Porto has available in its website Manuals that contain system's design and operations relevant information.

More detailed information can be provided to Euronext Securities Porto's national competent authority.

G22Q002

What documents comprise the CSD's rules and procedures? How are these documents disclosed to participants?

PFMI: Q.23.1.1AGC: n/a

Euronext Securities Porto's rules and procedures are included, respectively, in Regulations /Circulars/Instruction/Notices and in Manuals. These documents are publicly available on Euronext Securities Porto's website.

G22Q003

How does the CSD determine that its rules and procedures are clear and comprehensive?

PFMI: Q.23.1.2AGC: n/a

Euronext Securities Porto's rules are registered within CMVM, for legality control and conformity with the rules, which gives confidence and security to the applicability of those rules. Euronext Securities Porto rules are publicly disclosed on Euronext Securities Porto's website.

G22Q004

What information do the CSD's rules and procedures contain on the procedures it will follow in non-routine, though foreseeable, events?

PFMI: Q.23.1.3AGC: n/a

G22Q005

How and to whom does the CSD disclose the processes it follows for changing its rules and procedures?

PFMI: Q.23.1.4AGC: n/a

The process to change rules and procedures follow an internal approval and the assessment and approval from the regulator (CMVM – Comissão do Mercado de Valores Mobiliários).

G22Q006

How does the CSD disclose relevant rules and key procedures to the public?

PFMI: Q.23.1.5AGC: n/a

Through its website.

G22Q007

What documents comprise information about the system's design and operations? How and to whom does the CSD disclose the system's design and operations?

PFMI: Q.23.2.1AGC: n/a

Euronext Securities Porto has available in its website Manuals that contain system's design and operations relevant information. More detailed information can be provided to Euronext Securities Porto's national competent authority.

G22Q008

How and to whom does the CSD disclose the degree of discretion it can exercise over key decisions that directly affect the operation of the system?

PFMI: Q.23.2.2AGC: n/a

G22Q009

What information does the CSD provide to its participants about their rights, obligations and risks incurred through participation in the CSD?

PFMI: Q.23.2.3AGC: n/a

Euronext Securities Porto provides to its participants in its rules, manuals and other information available in its website, information related to their rights and obligations that enable them to assess the risks incurred.

G22Q010

How does the CSD facilitate its participants' understanding of the CSD's rules, procedures and the risks associated with participating?

PFMI: Q.23.3.1AGC: n/a

Explanation of the services provided and the procedures in place (available on Euronext Securities Porto's website), testing of new functionalities.

G22Q011

Is there evidence that the means described above enable participants' understanding of the CSD's rules, procedures and the risks they face from participating in the CSD?

PFMI: Q.23.3.2AGC: n/a

G22Q012

In the event that the CSD identifies a participant whose behaviour demonstrates a lack of understanding of the CSD's rules, procedures and the risks of participation, what remedial actions are taken by the CSD?

PFMI: Q.23.3.3AGC: n/a

Direct information to be provided.

G22Q013

Does the CSD publicly disclose its fees at the level of its individual services and policies on any available discounts? How is this information disclosed?

PFMI: Q.23.4.1AGC: n/a

Yes

G22Q014

How does the CSD notify participants and the public, on a timely basis, of changes to services and fees?

PFMI: Q.23.4.2AGC: n/a

By email and through Euronext Securities Porto's website.

G22Q015

Does the CSD provide a description of its priced services? Do these descriptions allow for comparison across similar CSD??

PFMI: Q.23.4.3AGC: n/a

Yes

G22Q016

Does the CSD disclose information on its technology and communication procedures, or any other factors that affect the costs of operating the CSD?

PFMI: Q.23.4.4AGC: n/a

Yes

G22Q017

When did the CSD last complete the PFMI Disclosure framework for financial market infrastructures? How frequently is it updated? Is it updated following material changes to the CSD and its environment and, at a minimum, every two years?

PFMI: Q.23.5.1AGC: n/a

G22Q018

What quantitative information does the CSD disclose to the public? How often is this information updated?

PFMI: Q.23.5.2AGC: n/a

Euronext Securities Porto discloses public information in its website.

G22Q019

What other information does the CSD disclose to the public?

PFMI: Q.23.5.3AGC: n/a

Euronext Securities Porto discloses to the public its annual, semi-annual and quarterly financial information.

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G22Q020

Capital. Are annual financial statements publicly disclosed?

PFMI: Q.23.5.3AGC: 13

 Yes No

G22Q021

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

PFMI: Q.23.5.3AGC: 13a.

 Yes No

G22Q022

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

PFMI: Q.23.5.3AGC: 13b.

G22Q023

filecount - If more than one document for 13b, please upload the additional document here:

PFMI: Q.23.5.3AGC: 13c.

G22Q024

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

PFMI: Q.23.5.3AGC: 13d.

G22Q025

If no, and annual report and/or financial statements are not disclosed, please state your share capital, reserves, and retained earnings (or equivalents as determined under local accounting standards). Share Capital (then please answer 13f):

PFMI: Q.23.5.3AGC: 13e.

G22Q026

Reserves (then please answer 13g):

PFMI: Q.23.5.3AGC: 13f.

G22Q027  
Retained Earnings:

PFMI: Q.23.5.3AGC: 13g.

G22Q028  
How does the CSD disclose this information to the public? In which language(s) are the disclosures provided?

PFMI: Q.23.5.4AGC: n/a

This information is available at Euronext Securities Porto website.

G22Q029  
AGC members from time to time receive requests from their direct investor-clients for an informational copy of a CSD's completed questionnaire. Such requests typically lead to interactions between personnel at the CSD 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 AGC members delivering a copy of your completed questionnaire to the member's direct client in response to the client's request?

PFMI: Q.23.5.4AGC: 100

Yes

No

G22Q030  
Are the results of the financial audit publicly available?

PFMI: Q.23.5.4 AGC: 15f

Yes

No

G22Q031  
Are the results of the operational audit publicly available?

PFMI: Q.23.5.4AGC: 16f

<https://www.euronext.com/pt/csd/porto/sobre-nos/relatorios-de-contas-estatutos>

Yes

No

G22Q032  
List of publicly available resources. Please list publicly available resources, including those referenced in the disclosure, that may help a reader understand the CSD and its approach to observing each applicable PFMI Principle.

PFMI: Annex A - CSD disclosure template - V.AGC: n/a

G22Q033  
filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

**Compliance with SEC Rule 17f-7**

G23Q001

Rule 17f-7, by reference to Rule 17f-4, requires that, for a CSD to be eligible to hold securities of U.S. registered investment companies (such depositories hereinafter referred to as "Eligible Securities Depositories"), the CSD 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?

PFMI: n/a AGC: 1

- Yes
- No

G23Q002

Please explain

PFMI: n/aAGC: 1a

G23Q003

Rule 17f-7 also requires that an Eligible Securities CSD "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:

PFMI: n/aAGC: 2

- Act as or operate a system for the central handling of securities or equivalent book-entries in the country where it is incorporated?
- Act as or operate a transnational system for the central handling of securities or equivalent book-entries?
- Act in another capacity with respect to the handling of securities or equivalent book-entries?
- Not applicable
- OTHER:

G23Q004

Please explain:

PFMI: n/aAGC: 2a.

G23Q005

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:

PFMI: n/aAGC: 2b.

Euronext Securities Porto accepts fungible securities in physical or in dematerialized form. The type of securities can be:

Equities:

- Shares (in registered or bearer form)
- Participation units (closed or open-end funds)
- Rights issues
- Warrants
- Certificates
- Structured instruments

Debt instruments:

- Corporate bonds
- Public debt
- Participation bonds
- Convertible bonds
- Commercial paper

G23Q006

Rule 17f-7 requires that an Eligible Securities Depository regulated by a foreign financial regulatory authority as defined under section 2(a)(50) of the Act, with section 2(a)(50) establishing that z '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 CSD?

PFMI: n/aAGC: 8

- 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:

G23Q007

Please explain:

PFMI: n/aAGC: 8a.

G23Q008

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

PFMI: n/aAGC: 9

~CMVM - Comissão do Mercado de Valores Mobiliários (The Portuguese Securities Market Commission)

G23Q009

Rule 17f-7 requires that an Eligible Securities Depository is subject to periodic examination by regulatory authorities or independent accountants. Is the CSD subject to periodic examination by:

PFMI: n/aAGC: 10

- Regulatory authorities?
- Independent accountants?
- OTHER:

G23Q010

Please explain:

PFMI: n/aAGC: 10a

G23Q011

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

PFMI: n/aAGC: 11

CMVM - Comissão do Mercado de Valores Mobiliários (The Portuguese Securities Market Commission)

G23Q012

What enforcement actions are available to regulatory authority #1 for breach of applicable statute or regulatory requirements?

PFMI: n/aAGC: 11a.

- Fines
- Restrictions on CSD activities.
- Suspension of CSD activities.
- Termination of CSD activities.
- OTHER:

G23Q013

Please explain:

PFMI: n/aAGC: 11b.

G23Q014  
 What enforcement actions are available to regulatory authority #2 for breach of applicable statute or regulatory requirements?  
 PFMI: n/a AGC: 11c.

- Fines
- Restrictions on CSD activities.
- Suspension of CSD activities.
- Termination of CSD activities.
- OTHER:

G23Q015  
 Please explain:  
 PFMI: n/a AGC: 11d.

G23Q016  
 Has there been any use of such enforcement actions in the last three years?  
 PFMI: n/aAGC: 12

- Yes
- No
- OTHER:

G23Q017  
 If yes, please explain:  
 PFMI: n/aAGC: 12a.

G23Q018  
 Has the regulatory body with oversight responsibility for the CSD issued public notice that the CSD is not in current compliance with any capital, solvency, insurance or similar financial strength requirements imposed by such regulatory body?  
 PFMI: n/aAGC: 90

- Yes
- No
- Not applicable

G23Q019  
 Please describe:  
 PFMI: n/aAGC: 90a.

G23Q020  
 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 CSD?  
 PFMI: n/aAGC: 90b.

- Yes
- No

G23Q021  
 If yes, please describe:  
 PFMI: n/aAGC: 90c.

G23Q022  
If no, why not?

PFMI: n/aAGC: 90d.

G23Q023

Rule 17f-7 requires that an Eligible Securities Depository holds assets for the custodian that participates in the system on behalf of the Fund under safekeeping conditions no less favorable than the conditions that apply to other participants. Please confirm that assets of foreign investors held by custodians as participants in the CSD are held under safekeeping conditions no less favorable than the conditions that apply to other participants.

PFMI: n/a AGC: 21

- Yes
- No
- Not applicable

G23Q024

If no, other or not applicable, please explain:

PFMI: n/aAGC: 21a.

G23Q025

Please confirm the basis for the arrangements you have 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.

PFMI: n/a AGC: 21b, 21c.

- Relevant Law and Regulation
- Standard participation contract
- Established terms and conditions of participation
- By-laws of the CSD
- Rules of the CSD
- OTHER:

G23Q027

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

PFMI: n/aAGC: 21d

The Portuguese Law applies to all financial intermediaries that exercise financial intermediation activities in the Portuguese Market, not applying different rules or having discriminatory treatment:

Article 293 of the Portuguese Securities Code (regarding Financial Intermediaries) establishes that:

1. Financial intermediaries of financial instruments are:

- a) Credit institutions and investment firms authorized to exercise financial intermediation activities in Portugal;
- b) Managing entities of collective investment undertakings authorized to exercise this activity in Portugal;
- c) Entities with functions correspondent to those described in the previous paragraphs that are authorized to exercise any financial intermediation activities in Portugal;
- d) Securities investment companies and real estate investment companies.

2. Investment firms of financial instruments are:

- a) Broker companies;
- b) Broker-dealer companies;
- c) Asset managing companies;
- d) The intermediary firms of money markets and foreign exchange markets;
- e) The investment advice firms;
- f) The management entities of MTFs;
- g) Others that are defined as such by law, or that, not being credit institutions, are persons whose regular and professional business consists of providing investment services to third parties or in carrying out investment activities.

The rules regarding the safekeeping of the assets apply to all custodians (financial intermediaries or other entities) and all the assets safekept under Portuguese Law receive the same level of protection (regarding the safeguarding of client assets, please see article 306 of the Portuguese Securities Code, that establishes as general rule that: (1) "In all acts performed, as well as in accounting and operations records, the financial intermediary" (considering the definition of article 293 above) "should maintain a clear distinction between its assets and the assets of each one of its clients". (2) The opening of proceedings for the insolvency, recovery of the company or reorganization of the financial intermediary does not have effects on actions carried out by the financial intermediary on behalf of its clients"

Finally, we should refer that Euronext Securities Porto does not apply different eligibility criteria to domestic or foreign entities that become affiliates of Euronext Securities Porto - Cfr. *Interbolsa Regulation 1/2016 – articles 4, 5 and 6*

G23Q028  
 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 CSD make available periodic safekeeping reports to participants, including notices of transfers to or from the participant's account?

PFMI: n/aAGC: 46

Yes  
 No

G23Q029  
 If no or other, please explain

PFMI: n/aAGC: 46a.

G23Q030  
 If yes, please indicate the scheduled frequency:

PFMI: n/a AGC: 46b, 46c.

Real time  
 Daily  
 Weekly  
 Monthly  
 Quarterly  
 Annually  
 Upon request  
 OTHER:

G23Q031  
 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 CSD maintain records that identify the assets of each participant and segregate the system's own assets from the assets of participants?

PFMI: Q.11.5.2 AGC: 53

Yes  
 No  
 Not applicable  
 OTHER:

G23Q031A  
 If answer to question 'G23Q031' is other or not applicable, please explain

PFMI: Q.11.5.2 AGC: 53a

G23Q032  
 filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

**Relevant RSSS recommendations**

G24Q001  
 Confirmation of trades between direct market participants should occur as soon as possible after trade execution, but no later than trade date (T+0). Where confirmation of trades by indirect market participants (such as institutional investors) is required, it should occur as soon as possible after trade execution, preferably on T+0, but no later than T+1.

PFMI: 2 - Trade confirmationAGC: n/a

N/A

G24Q002

Rolling settlement should be adopted in all securities markets. Final settlement should occur no later than T+3. The benefits and costs of a settlement cycle shorter than T+3 should be evaluated.

PFMI: 3 - Settlement cyclesAGC: n/a

Euronext Securities Porto complies with article 5 of the CSD Regulation (final settlement occurs in T+2).

G24Q003

Securities lending and borrowing (or repurchase agreements and other economically equivalent transactions) should be encouraged as a method for expediting the settlement of securities transactions. Barriers that inhibit the practice of lending securities for this purpose should be removed.

PFMI: 5 - Securities lendingAGC: n/a

G24Q004

Securities should be immobilised or dematerialised and transferred by book entry in CSDs to the greatest extent possible.

PFMI: 6 - Central securities depositories (CSDs)AGC: n/a

Euronext Securities Porto complies with article 3 of the CSD Regulation (Book-entry form).

G24Q005

Entities holding securities in custody should employ accounting practices and safekeeping procedures that fully protect customers' securities. It is essential that customers' securities be protected against the claims of a custodian's creditors.

PFMI: 12 - Protection of customers' securitiesAGC: n/a

Euronext Securities Porto complies with article 38 of the CSD Regulation (Protection of securities of participants and those of their clients).

G24Q006

filecount - Add relevant appendices for this group.

PFMI: n/a AGC: n/a

### Cyber Security

G25Q001

Does your organization have a documented cyber security policy in place?

PFMI: n/a AGC: 101

Yes

No

Euronext Cyber & Information Security Policy, approved by Euronext Group CISO, consolidates all Information Security Standards in place at Group level

G25Q002

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

PFMI: n/a AGC: 102

Yes

No

Cyber & Information security policy are published on Euronext's intranet and publicly available. During onboarding sessions an Information Security Policies Booklet is shared with all new joiners. Specific trainings, part of Euronext Info Security Awareness program, also cover this point.

G25Q003  
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.

PFMI: n/a AGC: 103

- IT Asset & Inventory Management
- Architecture Management
- Change Management
- Security Awareness & Training
- IT Protective Security Technology
- Access Management
- Logging, Monitoring, and Alerting
- Cyber Event Detection
- Incident Response and Recovery
- OTHER:

G25Q004  
In the last 12 months have there been any changes to the policy?

PFMI: n/a AGC: 104

- Yes
  - No
- The annual review of Information Security Policies was performed.

G25Q005  
Please advise how often you review the policy.

PFMI: n/a AGC: 105

- Annually
- Semi-annually
- Other

G25Q006  
filecount - Please provide (as an attachment) a diagram showing where your cyber security function resides and who it reports to.

PFMI: n/a AGC: 106

G25Q007  
How does your organization identify cyber risks to business functions?

PFMI: n/a AGC: 107

- Enterprise Risk Management Framework
- External Reviews
- Risk and Control Assessments
- OTHER:

G25Q008  
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?

PFMI: n/a AGC: 108

- Yes
- No

G25Q009  
What technological controls and protections are in place for your systems and networks?  
PFMI: n/a AGC: 109

- Encryption of data at rest
- Encryption of data in transit
- Anti-virus software
- Anti-malware software
- Intrusion detection systems
- Intrusion prevention systems
- Firewalls
- Patch Management
- User Access Controls
- OTHER:

G25Q010  
Does your organization use multi-factor authentication  
PFMI: n/a AGC: 110

- Yes
- No

G25Q011  
Where your organization has outsourced activities or functions to a third-party provider, is your cyber risk exposure documented?  
PFMI: n/a AGC: 111

- Yes
- No
- Not applicable as no outsourcing

G25Q012  
What measures does your organization have to ensure early detection of a cyber attack?  
PFMI: n/a AGC: 112

- Incident Response Plan
- Logging of IT systems
- Searching for network traffic patterns
- Searching for user login patterns
- OTHER:

G25Q013  
What is the agreed resumption time for critical operations following a cyber attack?  
PFMI: n/a AGC: 113

- 1 - 4 hours
- 4 - 8 hours
- 8 - 24 hours
- Longer than 24 hours
- OTHER:

G25Q014

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

PFMI: n/a AGC: 114

- By e-mail
- By telephone
- Public announcement
- Press release

G25Q015

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.

PFMI: n/a AGC: 115

- Yes
- No

G25Q016

Are the following elements of your cybersecurity framework tested pre deployment of changes?

PFMI: n/a AGC: 116a

- Vulnerability assessment
- Scenario based penetration tests
- Testing of incident response process and technical/business/operations (e.g. table-top exercise)
- OTHER: Euronext has Change management process that shall be followed for any change. It considers 3 types of changes (standard, normal and emergency). Normal changes require a definition of rollback plans, identification of risks and require a formal approval from CAB

G25Q016A

Are the following elements of your cybersecurity framework tested post deployment of changes?

PFMI: n/a AGC: 116b

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

G25Q017

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

PFMI: n/a AGC: 117

- Yes
- No
- Not applicable as cloud not used

G25Q018

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

PFMI: n/a AGC: 118

- Yes
- No

G25Q019

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

PFMI: n/a AGC: 119

Yes

No

G25Q020

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

PFMI: n/a AGC: 120

Yes

No

**Appendices**

G26Q001

filecount - Add relevant appendices

PFMI: n/a AGC: n/a