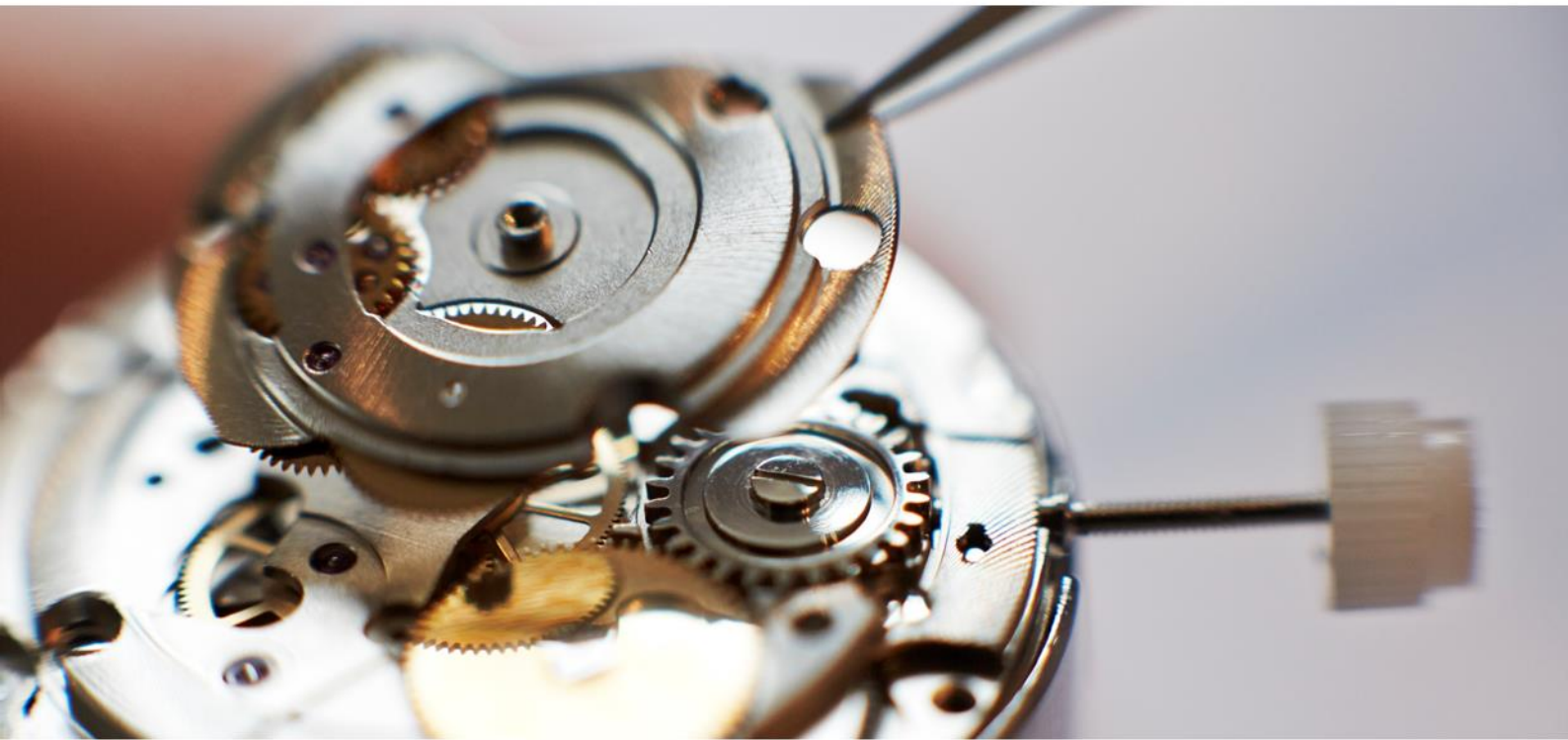




Disclosure of SIX SIS AG regarding the CPMI-
IOSCO principles for FMI
in accordance with "Disclosure framework and Assessment
methodology", December 2012

August 2025





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1. Executive summary

SIX SIS AG (hereafter referred to as "SIX SIS") is a wholly-owned subsidiary of SIX Securities Services AG (SIX Securities Services), which itself is a wholly-owned subsidiary of SIX Group AG (SIX). SIX operates Switzerland's and Spain's financial market infrastructure and offers comprehensive services in the areas of securities trading, clearing and settlement. The company is an unlisted public limited company domiciled in Zurich and owned by its users (around 120 national and international financial institutions of various size and orientation).

SIX SIS is a stock corporation with its registered domicile in Olten, Switzerland. As of 31 December 2024, SIX is operationally divided into four business units, active in the following fields of business:

- Business Unit Securities & Exchanges (BXS): Operation of the Swiss and Spanish Stock Exchange for trading of Swiss securities, listing and trading of both Swiss and foreign equities, bonds, exchange-traded funds (ETFs), exchange-traded products (ETPs), funds and structured products as well as of Aquis, a pan-european multilateral trading facility based in London
- Business Unit Securities Services (BSS): Securities services (securities clearing, settlement, custody) and operation of the Swiss and Spanish CSD (Central Securities Depository)
- Business Unit Banking Services (BBS): Electronic, automated billing (services in acquiring billers and recipients for e-invoicing in the B2B market) and interbank clearing
- Business Unit Financial Information (BFI): Financial information (reference and market data)

The Corporate Function Finance & Services (CFO) is mainly responsible for the provision of centralized services such as accounting, controlling, tax & finance international, strategic projects, treasury, procurement, and logistics, while the Corporate Function IT (CIT) is the Group's IT facilitator. The Corporate Function Risk, Security & Compliance (CRO) delivers an independent monitoring of the overall risk situation, as well as advice and support in compliance and IT security affairs. Other Corporate Functions are Legal & Regulatory (CLE), Marketing & Communications (CMC) and Human Resources (CHR).

Through its subsidiaries, in particular SIX SIS, SIX Securities Services covers the entire post-trade transaction lifecycle including clearing, settlement, securities custody and administration. It provides the Swiss financial center and international markets with an efficient and largely automated infrastructure. SIX SIS is licensed as systemically important Financial Market Infrastructure (FMI) subject to the supervision of the Swiss



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Financial Market Supervisory Authority (FINMA). Pursuant to the National Bank Act, SIX SIS is also supervised by the Swiss National Bank (SNB).

SIX SIS offers, as a CSD and global custodian, settlement, custody and asset servicing to clients all around the world. SIX SIS is both an issuer and an investor CSD, the operator of the securities settlement system (SSS) SECOM, and a provider of a wide range of CSD and global custodian services, including safekeeping, custody and banking-type services. As a CSD, SIX SIS is also a member of the European Central Securities Depositories Association (ECSDA) which represents about 40 national and international CSDs across Europe aiming to contribute to an efficient and risk-averse infrastructure for European financial markets.

The Principles for Financial Market Infrastructures (PFMI) set out international standards to foster effective risk management, strong governance and oversight of FMIs. As a systemically important CSD and operator of a securities settlement system, SIX SIS has to comply with all PFMI that are addressed to CSDs and SSSs respectively. Through the publication of this document, SIX SIS discloses the relevant information in order to enable the participants, authorities and the broader public to better understand SIX SIS' approach to fulfilling the PFMI. The present disclosure basically provides:

1. a summary of the major changes since the last update of the disclosure (section 2);
2. a description of SIX SIS' services and markets, its organization and legal framework (section 3);
3. a comprehensive narrative disclosure for each applicable principle to enable the reader to understand SIX SIS' approach to fulfilling the PFMI (section 4);
4. a list of publicly available sources that may help the reader to better understand the narrative disclosure (section 5)

The cut-off date for the data used in this disclosure report is 30 June 2025.

2. Major changes since the last disclosure update

This is the sixth issue of SIX SIS' assessment regarding the disclosure framework based on the CPMI-IOSCO Principles for Financial Market Infrastructures (PFMI 2012). It replaces the earlier version of 2023.

In 2024 SIX SIS introduced the browser-based Custody Cockpit platform, which offers various functionalities to increase processing efficiency on the client side. The first module, "Settlement", was introduced in June 2024. As a second step, SIX SIS is planning to further enhance Custody Cockpit with new functionalities such as a corporate actions module, a funds module and Secure Swiss Finance Network (SSFN) eligibility.



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Moreover, SIX SIS improved its processing times and system availability in SECOM in 2024. The start of EOD processing has been moved from 22:00 CET to 23:15 CET Monday to Thursday and from 22:00 CET on Friday to 02:15 CET on Saturday. With the shift of EOD and EOM deadlines in SECOM, instructions and status messages are accepted and processed during these extended processing windows.

Updates regarding the Risk Management Framework are reflected in the answers to the respective principles. Furthermore, the disclosure has been slightly adjusted to improve readability and comprehensiveness.

3. General background on SIX SIS

3.1 General description of SIX SIS and its services

SIX SIS is the national CSD of the Swiss financial market and a global custodian, providing complete services for the settlement and custody of national and international securities. It operates one of the worlds few online real-time settlement systems (SECOM) allowing market participants to settle their transactions via a single technical interface.

Domestic Custody

SIX SIS provides its clients comprehensive custody services for the Swiss market. It offers custody services including settlement, issuer services, asset servicing, repo, Swiss fund processing, queries and reporting, and tax services.

With respect to real-time online settlement, SIX SIS covers a range of activities including locked-in processing of stock exchange trades, order matching and settlement of Over-The-Counter (OTC) transactions, real-time status intimations, standing instructions and cash settlement in CHF and foreign currencies in a single comprehensive solution.

International Custody

SIX SIS covers over 50 markets with its international custody services. Ranging from direct access to T2S and several European CSDs such as Clearstream Germany, Clearstream Luxembourg, Euroclear Belgium, Euroclear France, Euroclear Nederland, Iberclear Spain, VP Denmark, National Bank of Belgium, Keler Hungary, Oekb Austria and VPS Oslo, Norway, to covering all asset classes, as well as its cross-border realignment service and the de-linked account model, SIX SIS can offer international settlement services to its clients.

Within its international custody services, SIX SIS offers its clients beside the cross-border settlement a wide range of services including asset servicing, cash management, integrated exchange and settlement services as well as advanced tax services.



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With respect to asset servicing, SIX SIS provides information management and processing through to rights trading, instruction flow and deadline management, to market claims, proxy voting and market information management. Its cash management services support SIX SIS' clients in Foreign Exchange (FX) conversions, payment management, reporting or five-day cash planning through a single-account approach to cross-border payments.

Securities Finance

Securities Finance's offering called CO:RE (Collateral & Repo) consists of securities lending & borrowing (SLB), Repo and Triparty Collateral Management (TCM) as well as the Triparty Agent (TPA) service. With the Triparty Agent (TPA) and the integrated Collateral Cockpit, traders and collateral managers are able to manage their assets in one system. The solution offers an integrated collateral management service for small and mid-sized banks. While executing trading strategies, clients are offered liquidity for short positions.

SIX SIS is the exclusive provider of repo services for the SNB, including General Collateral (GC), multicurrency, special and special-rate repos in its repo product portfolio. The repo transaction (Repo) is the most important type of transaction between banks and the SNB. The SNB buys securities from a commercial bank and when purchasing them, agrees that the bank will repurchase the securities later on. This enables the bank to receive liquidity from the SNB. The SNB demands interest on this loan, which is known as repo interest. SIX SIS, as the sole provider of this service for Switzerland, provides an optimal platform for this type of transaction and offers the automated settlement of repo transactions. As repos are traded and settled via the proven Swiss Value Chain (SIX Repo AG – SIX SIS – SNB), straight-through processing is guaranteed. Settlement is conducted on a trade-by-trade basis and is irrevocable. In addition to CHF repo transactions, it is also possible to carry out repo transactions in EUR, USD, GBP, CAD, JPY, AUD, NZD, SEK, NOK, DKK, HUF, CZK and PLN.

For the term of a repo transaction, SIX SIS provides comprehensive and fully automated risk management. All outstanding debts and liabilities are assessed several times a day to offset any net exposures by automatically carrying out a margin transfer. This provides a maximum level of risk mitigation.

In principle, SIX SIS' clients may use all securities deposited with SIX SIS for repo trading. SIX SIS also offers a General Collateral Selection Mechanism (GCselect), through which the system can identify and automatically assign repo collateral securities of a specified quality that have been released for repo trading.

SIX SIS' settlement-fails-driven offering, SLB, automatically draws assets from a centralized lending pool. The assets to be used exist in a special safe custody account of the lender – this ensures that there is never a shortfall in securities and that trades settle on time. Settlement-driven SLB is a popular service offered by SIX SIS, where



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clients act as either lenders or borrowers. The positions agreed for securities lending are transferred to a separate lending account, from which SIX SIS creates a virtual lending pool. Clients with short positions can then borrow the securities they require for settlement from this pool. As the principal, SIX SIS acts for its own account. It borrows the securities provided by the lender and passes them immediately on to the borrower.

Featuring real-time exposure coverage and collateral substitution, as well as full integration with other securities financing products, SIX SIS' TCM offering can be used to define a range of criteria for a client's specific collateral requirements. Once done, the rest is automatic – including matching for all parties – and features straight-through processing. With TCM, SIX SIS assumes responsibility for administering exposures and collateralizing them using assets of the same value (securities and cash). All pledged collateral positions are administered by SIX SIS acting as the pledge holder for the parties. The exposure is constantly checked to ensure it is covered by sufficient collateral. If there is a shortfall against the exposure, valid collateral is automatically drawn from the pool account of the collateral provider and transferred to the TCM account where the collateral is deposited. If there is excess coverage, collateral is booked back into the pool account.

Tax Services

SIX SIS offers a tax reclaim service in all major markets subject to receiving all necessary documents and information. SIX SIS offers Relief at Source, Quick- or Standard Refund either through omnibus or segregated accounts. After receipt of the tax amount reclaimed, SIX SIS credits the amount to the client's account. In the case of relief at source, the correct deductions are made as of distribution date.

SIX SIS also offers a pro-active tax reclaim service (Advanced Tax Services) for eligible beneficial owners and assists when clients are submitting reclaims on behalf of beneficial owners themselves. In this case, SIX SIS will check the forms, attach additional documents such as tax vouchers where needed and/or add such information directly on the reclaim forms. With this Advanced Tax Services, SIX SIS has an end-to-end tax service provision. Banks can then offer their clients reclaim excess withholding taxes paid on dividends and interest. Clients access the service online and submit all relevant information through the innovative, web-based ATS Portal. SIX SIS then coordinates all necessary steps with the relevant custodian or tax authorities. Clients can benefit from the service irrespective of whether the assets are held in custody at SIX SIS or not.

Funds Services

SIX SIS offers a centralized trading, settlement and custody service of all global funds. It is a single source for all fund processing needs and covers transfer, subscription and redemption, corporate action and trailer fee activities. SIX SIS' Multi-Provider Strategy



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ensures an optimized market coverage. Global Fund Services (GFS) is facilitating the client access and participation to distribution agreements and enabling clients to generate trailer fees for their end-clients. Our fund expert team and its specialist knowledge as well as the personal contact and provided support to clients ensure a high level of service quality.

3.2 General organization of SIX SIS

SIX SIS governance

As part of the Business Unit Securities Services, SIX SIS is a company incorporated under Swiss Law. Its governance structure consists of a Board of Directors (BoD) and the Management Committee. The BoD comprises two representatives of the SIX Executive Board – herein representing the integration of SIX SIS within the SIX organization –, two external / independent Board Members and one representative of the SIX Group BoD who will also act as the Chairman of the BoD of SIX SIS. The tasks of the BoD arise from the law (e.g. code of obligations), the Articles of Incorporation, the Competency Rules and specific regulations for SIX SIS, in particular the Financial Market Infrastructure Act (FMIA). The Management Committee consists of the Head SIX SIS acting as the CEO and Chair, the CFO, the CRO, the Head Sales & RM and the Head International Custody Operations. The CEO of SIX SIS is member of the Securities Services Management Committee and primarily responsible for managing SIX SIS within the framework of the Group's strategy as well as the specifications of the SIX BoD and the ExB.

SIX SIS, as is the case for all units of SIX, has established high standards of professional conduct that direct its ongoing activities. These standards are formalized in the form of policies and procedures applicable to employees, senior management and directors.

SIX SIS is transparent on its financial performance, governance structures, relying on media releases and the regular publication of financial statements. All relevant information is found on the website of SIX and SIX Securities Services.

Wherever possible, SIX SIS uses the services of other affiliated companies of SIX. SIX SIS outsources the operation and maintenance of its data center to SIX Group Services AG (SIX Group Services). This outsourcing arrangement is governed by Service Level Agreements (SLA) in compliance with FINMA regulations. Staff members of SIX Group Services are required to maintain FMI secrecy.

Risk Framework

A "three lines of defense" governance model forms the basis of the risk governance framework. The SIX-wide standardized framework combined with the integrated risk management organization regulates the positioning of the Risk Management function



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at SIX and systematically defines responsibilities, methods, processes and reporting of the risks faced by SIX.

Senior executives of SIX SIS, as the first line of defense, are accountable for managing the specific risks faced by business management. They maintain effective processes and manage their risk properly, including comprehensive controls and documented procedures.

The second line of defense is a Group-wide unified organization consisting of a central Risk Management function headed up by the Group Chief Risk Officer (CRO), together with dedicated Risk Management teams and a dedicated CRO for SIX SIS who has a solid reporting line to the CEO SIX SIS and functionally reports into the Group CRO organization. The functionally structured central Risk Management teams deal with financial and non-financial risks, Group-wide risk reporting, risk analysis and the central insurance portfolio. In addition, the risk management teams in the business areas address the business-specific risks in each area. Primary risks within SIX SIS include strategic and business risks, reputational risks, operational risks, credit risks (counterparty risks, default risks), liquidity risks, market risks, interest rate risks and financial crime risks.

The BoD and the internal and external auditors constitute the third line of defense. They are responsible for independently monitoring and controlling the risk management organization and the risks faced by the companies of SIX.

Further details can be found in the annual reports.

Risk policy

The scope of SIX SIS's risk policy is determined by the risk policy of SIX, in which the principles and philosophy applied to various risks are set out. The risk policy precisely defines the organization, structures, competencies and responsibilities and provides the basis for dealing with different kinds of risk as well as outlining the readiness to assume risk. The risk policy constitutes the central framework for regulations and directives of the individual companies and for the risk categories.

Risk appetite

The Group-wide framework for risk management at SIX clearly defines the risk appetite of SIX, its business united and FMIs. The risk management concept sets limits for risk appetite and risk tolerance within the organization, monitors compliance with the defined thresholds and shows how the company's risk profile changes over time.



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3.3 Legal and regulatory framework

SIX SIS as the Swiss CSD has to comply with the following regulatory and supervisory structures, thereby providing a high degree of legal certainty.

SIX SIS is authorized as a systemically important Financial Market Infrastructure (FMI) by the Swiss Financial Market Supervisory Authority (FINMA) and is subject to the Federal Act on Financial Market Infrastructures and Market Conduct in Securities and Derivatives Trading (Financial Market Infrastructure Act, FMIA) and the corresponding ordinance on Financial Market Infrastructures and Market Conduct in Securities and Derivatives Trading (Financial Market Infrastructure Ordinance, FMIO).

In addition to the aforementioned regulation and supervision by FINMA, SIX SIS, being a systemically important FMI, is also - according to art. 83 (1) FMIA and art. 19 Swiss Federal Act on the Swiss National Bank (NBA) - subject to oversight by the SNB. The SNB-relevant regulation is outlined in the National Bank Ordinance (NBO), stating various minimum requirements SIX SIS has to comply with (art. 21a (2) NBO), e.g. regarding the contractual framework (art. 23 NBO). The latter defines, among other things:

- the participation requirements as well as the criteria for the suspension and exclusion of a participant;
- the rights and obligations of SIX SIS and its participants;
- the rules and procedures for operation;
- the rules and procedures in the event of a participant's default; and
- the reciprocal rights and obligations arising from links with other FMIs: links to other CSDs and foreign sub-custodians.

The custody of certificated and uncertificated securities by custodians and their transfer is regulated by the Swiss Federal Intermediated Securities Act (FISA), ensuring also the protection of property rights of investors (art. 1 FISA).

Relevant jurisdictions:

The most relevant legal jurisdiction of SIX SIS' activities is Switzerland. Whenever possible, SIX SIS concludes agreements under Swiss law. Where connections with foreign parties or foreign securities exist and foreign jurisdictions and the respective laws might be applicable, SIX SIS seeks, where necessary, advice from local external lawyers to assess the legal risks and measures for mitigation.



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4. Principle-by-principle summary narrative disclosure

4.1 Principle 1: Legal basis

An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.

4.1.1 Key Consideration 1

The legal basis should provide a high degree of certainty for each material aspect of an FMI's activities in all relevant jurisdictions.

SIX SIS is a Swiss company and as such organized and regulated primarily in accordance with Swiss law. It is an authorized Financial Market Infrastructure (FMI) and mainly regulated by the Financial Market Infrastructure Act (FMIA) and the respective ordinance (FMIO). According to art. 4 and 83 (1) FMIA as well as art. 19 NBA, SIX SIS is supervised by the Swiss Financial Market Supervisory Authority (FINMA) and due to its systemic importance in Switzerland also subject to oversight by the Swiss National Bank (SNB). The SNB-relevant regulation is outlined in the NBO. FMIA as well as FMIO and NBO state various requirements SIX SIS has to comply with. E.g. art. 23 NBO defines requirements regarding the contractual framework that have been implemented by SIX SIS as follows:

- the participation requirements as well as the criteria for the suspension and exclusion of a participant are governed by sec. 1 seq. General Terms and Conditions of SIX SIS (GTC SIX SIS), which are published on the website of SIX SIS;
- the rights and obligations of SIX SIS and its participants are primarily defined in the service contracts, further individual agreements and the GTC SIX SIS;
- the rules and procedures for operation are reflected in the overall body of rules of SIX SIS. The primary operative rules are listed under the definition of "Rules and Regulation" in sec. 10 GTC SIX SIS;
- the rules and procedures in the event of a participant's default are defined in sec. 2 GTC SIX SIS. A distinction must be made between cases where a termination of participation is mandatory and cases where SIX SIS has a certain discretion;
- the reciprocal rights and obligations arising from links with other financial market infrastructures: links to other CSDs and foreign sub-custodians e.g. have to fulfil clear legal and operative criteria. There are also other links, for instance to central counterparties (CCPs) and trading platforms.

SIX SIS regularly reviews the effectiveness and enforceability of the aforementioned contractual framework in all relevant jurisdictions and takes the necessary measures to limit any legal risks (see art. 23 (2) NBO).

Regarding settlement finality please refer to Principle 8.



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The legal basis should provide a high degree of certainty for each material aspect of an FMI's activities in all relevant jurisdictions.

Apart from the aforementioned relevant FINMA regulation as a first element and regulation in connection with the SNB as a second element, there is, as a third element, the regulation of certificated and uncertificated securities, which is important for a Swiss CSD. The custody of certificated and uncertificated securities by custodians and their transfer is regulated by the Swiss Federal Intermediated Securities Act (FISA), which also ensures the protection of property rights of investors (art. 1 FISA).

The immobilization or dematerialization of securities and the transfer of securities by book entry is governed by FISA, in particular art. 6 seqq. FISA. SIX SIS is bound by such cogent legislation. The GTC SIX SIS are in line with FISA. The creation, conversion, and extinction of intermediated securities at SIX SIS and the disposition of securities positions are governed in more detail by sec. 23 seqq. and sec. 34a seqq. GTC SIX SIS.

Under this mainly three-folded robust regulation, SIX SIS may hold deposits in cash and financial instruments on behalf of its participants and extend credit to its participants as well as provide further services in connection with settlement and custody.

Relevant jurisdictions:

The most relevant legal jurisdiction of SIX SIS activities is Switzerland. Whenever possible, SIX SIS concludes agreements under Swiss law. However, if – from a Swiss perspective – connections with foreign parties or foreign securities exist, it may be the case that foreign jurisdictions have to be considered as well and their laws might be applicable. In such constellations, SIX SIS seeks, where necessary, advice from local external lawyers to get a better understanding of possible legal risks and possible measures for mitigation.

4.1.2 Key Consideration 2

An FMI should have rules, procedures, and contracts that are clear, understandable, and consistent with relevant laws and regulations.

SIX SIS ensures that its rules, procedures and contractual arrangements are clear, comprehensive, in writing and in compliance with Swiss as well as all other applicable regulatory and supervisory requirements. It is in constant ongoing contact with its regulators. For instance, the regulators may examine the legal structures of a service or SIX SIS may want to discuss the implementation / alteration of a service before it comes into effect. In addition, internal and external audit may review the rules and regulation of SIX SIS.

SIX SIS's compliance function has the responsibility to detect any risk of non-compliance with the obligations under relevant regulation by SIX SIS and its employees.

SIX SIS' rules, procedures, contractual arrangements, and any accompanying material are accurate and up-to-date. Where certain expertise or technical means are not



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An FMI should have rules, procedures, and contracts that are clear, understandable, and consistent with relevant laws and regulations.

available internally, they may be obtained by the involvement of third parties outside SIX.

Certain documents, such as the GTC SIX SIS, are publicly available via the website of SIX SIS; others are available for participants only and can be found in the participant section on the website. The Swiss regulators have access to all documents.

SIX SIS identifies and analyses the soundness of its rules, procedures and contractual arrangements on an ongoing basis.

SIX SIS has adequate rules in place to make amendments to its GTC. Each participant has the right to object to amendments. The steps to be taken after an objection depend on the individual circumstances of the case. Discussions will then take place with the respective participants to get this issue resolved.

4.1.3 Key Consideration 3

An FMI should be able to articulate the legal basis for its activities to relevant authorities, participants, and, where relevant, participants' customers, in a clear and understandable way.

Please refer to Key Consideration 1.2.

SIX SIS provides information on its company profile and governance, regulatory framework, products and services, financials and relevant developments/changes on its website.

4.1.4 Key Consideration 4

An FMI should have rules, procedures, and contracts that are enforceable in all relevant jurisdictions. There should be a high degree of certainty that actions taken by the FMI under such rules and procedures will not be voided, reversed, or subject to stays.

SIX SIS has rules, procedures, and contracts in place that are enforceable in all relevant jurisdictions. To become a participant of SIX SIS, potential participants have to submit themselves to Swiss law (see sec. 12 service contract and sec. 49 GTC SIX SIS).

Whenever possible, SIX SIS acts under Swiss law. If, from a Swiss perspective, foreign law is applicable, SIX SIS obtains, where necessary, legal opinions from local lawyers of the relevant jurisdiction (see also Key Consideration 1.1).

4.1.5 Key Consideration 5

An FMI conducting business in multiple jurisdictions should identify and mitigate the risks arising from any potential conflict of laws across jurisdictions.



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A key objective of SIX SIS is to ensure the safety and integrity of financial markets. It is fully aware of the risks arising from any potential conflict of laws across jurisdictions. Subsequently, SIX SIS identifies and mitigates those risks to the extent possible. When SIX SIS receives an indication of potential conflicts of law issues, the identified issues are analyzed. If necessary, SIX SIS contacts local law firms to provide legal opinions and take further steps based on these legal opinions (see also Key Consideration 1.1).

4.2 Principle 2: Governance

An FMI should have governance arrangements that are clear and transparent, promote the safety and efficiency of the FMI, and support the stability of the broader financial system, other relevant public interest considerations, and the objectives of relevant stakeholders.

4.2.1 Key Consideration 1

An FMI should have objectives that place a high priority on the safety and efficiency of the FMI and explicitly support financial stability and other relevant public interest considerations.

SIX SIS is incorporated under Swiss Law and is a wholly-owned subsidiary of SIX Securities Services, which itself is a wholly-owned subsidiary of SIX Exchange Group which is wholly owned by SIX Group AG. The latter's shares are owned by a large number of the users of its services at SIX SIS. The Board of the holding company (SIX) is composed of members drawn from these users. Therefore users' interests and sensitivities are reflected in the activities of SIX SIS.

The vital interest of the users is manifest by the mandate of the Group BoD. As the Swiss CSD, the settlement of securities transactions as well as the custody and administration of securities are the main focus of SIX SIS. Particularly being a systemically important financial infrastructure for the Swiss market, safety, reliability, stability, and efficiency are essential to these activities of SIX SIS.

In addition, the participants of SIX SIS are involved in various bodies on strategic, operative, and technical levels.

4.2.2 Key Consideration 2

An FMI should have documented governance arrangements that provide clear and direct lines of responsibility and accountability. These arrangements should be disclosed to owners, relevant authorities, participants, and, at a more general level, the public.

The current governance structure of SIX is presented on its website. SIX SIS' governance requirements are mainly set out in the Swiss Code of Obligations (art. 698 seqq.), FMIA (art. 8) and FMIO (art. 7 seq). Internal documents such as the Articles of Association and the organizational rules are in line with these regulations. SIX SIS has



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An FMI should have documented governance arrangements that provide clear and direct lines of responsibility and accountability. These arrangements should be disclosed to owners, relevant authorities, participants, and, at a more general level, the public.

in place adequate processes for ensuring accountability to all its stakeholders (shareholders, regulators, members and other clients).

Art. 9 (2) FMIA prescribes that the members of the BoD, containing also non-executive directors, and senior management have an impeccable reputation and possess the experience and skills to perform their mandate. FINMA has to give its consent to the members of both bodies (art. 10 (1) FMIO) and has done so.

SIX SIS and SIX publish relevant governance information via media releases and on the website of SIX, including the annual reports with their chapters on organization and responsibilities. SIX SIS publishes essential information within the meaning of art. 21 FMIA / art. 19 lit. c FMIO.

Please refer to the information under Key Consideration 2.1.

4.2.3

Key Consideration 3

The roles and responsibilities of an FMI's BoD (or equivalent) should be clearly specified, and there should be documented procedures for its functioning, including procedures to identify, address, and manage member conflicts of interest. The board should review both its overall performance and the performance of its individual board members regularly.

According to art. 716a (1) Swiss Code of Obligations, the BoD has the following non-transferable and inalienable duties:

- the overall management of the company and the issuing of all necessary directives;
- determination of the company's organization;
- the organization of the accounting, financial control and financial planning systems as required for the management of the company;
- the appointment and dismissal of persons entrusted with managing and representing the company;
- overall supervision of the persons entrusted with managing the company, in particular with regard to compliance with the law, articles of association, operational regulations and directives;
- compilation of the annual report, preparation for the general meeting and implementation of its resolutions; and
- notification of the court in the event that the company is over indebted.

Furthermore, the BoD is responsible for an appropriate risk and control environment and an effective Internal Control System (ICS). It appoints and monitors the internal audit, commissions the regulatory audit firm and assesses its reports.



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The roles and responsibilities of an FMI's BoD (or equivalent) should be clearly specified, and there should be documented procedures for its functioning, including procedures to identify, address, and manage member conflicts of interest. The board should review both its overall performance and the performance of its individual board members regularly.

According to the articles of association, the management of the business of SIX SIS and the execution of resolutions taken by the BoD are incumbent on the senior management (see art. 716a (2), 716b (1) Swiss Code of Obligations).

The members of the BoD and third parties engaged in managing the company's business, e.g., the senior management, must perform their duties with all due diligence and safeguard the interests of the company in good faith (art. 717 (1) Swiss Code of Obligations). Conflicts of interest are to be avoided and can lead to liability claims against the corresponding member of the BoD or senior management (see art. 754 Swiss Code of Obligations). The Legal & Compliance departments have to intervene in cases of (potential) conflicts of interest.

SIX SIS has established the following rules and procedural guidelines for its corporate governance and administration:

- Articles of association
- Organizational rules
- Order of competences
- Intercompany and Service Level Agreements (SLAs) with SIX Group Services AG, SIX Securities Services and SIX x-clear

In general SIX has established high standards of professional conduct which shall direct the ongoing activities of its units. These standards are formalized in the Group Code of conduct and in various policies and procedures applicable to directors, senior management and employees across the Group. The BoD of SIX SIS has its performance regularly assessed by external audit (see art. 8 (3) FMIO).

4.2.4 Key Consideration 4

The board should contain suitable members with the appropriate skills and incentives to fulfil its multiple roles. This typically requires the inclusion of non-executive board member(s).

According to art. 698 sec 2 (2) Swiss code of obligations, the shareholders' meeting, i.e. the representative of SIX as the sole shareholder, appoints the members of the BoD of SIX SIS. As of June 2025 the composition of the BoD of SIX SIS is as follows: two Executive Board Members, two external/independent Board Members, one representative of the SIX Group BoD who will also act as the Chairman of the BoD of SIX SIS. Therefore, users' interests and sensitivities are duly reflected in the management of SIX SIS.



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The board should contain suitable members with the appropriate skills and incentives to fulfil its multiple roles. This typically requires the inclusion of non-executive board member(s).

As mentioned under Key Consideration 2.2, art. 9 (2) FMIA prescribes that the members of the BoD, containing also non-executive directors, and senior management members have an impeccable reputation and possess the experience and skills to perform their mandate. Additionally, they need to provide the guarantee of irreproachable business conduct (art. 9 (1) FMIA) and FINMA has to give its consent to the members of both bodies (art. 10 (1) FMIO) and has done so.

4.2.5 Key Consideration 5

The roles and responsibilities of management should be clearly specified. An FMI's management should have the appropriate experience, a mix of skills, and the integrity necessary to discharge their responsibilities for the operation and risk management of the FMI.

As outlined in Key Consideration 2.4, the management of SIX SIS is in full compliance with the Swiss law, especially regarding the guarantee of irreproachable business conduct and the reputation and qualifications needed for the respective function. SIX SIS operates under a two-tiered structure comprising a BoD and a management committee. A CEO has been appointed by the BoD and chairs the management committee.

According to the articles of association, the management of the business of SIX SIS and the execution of resolutions taken by the BoD are incumbent on the senior management (see art. 716a (2), 716b (1) Swiss Code of Obligations).

The members of the BoD and third parties engaged in managing the company's business, e.g., the senior management, must perform their duties with all due diligence and safeguard the interests of the company in good faith (art. 717 (1) Swiss Code of Obligations).

4.2.6 Key Consideration 6

The board should establish a clear, documented risk-management framework that includes the FMI's risk-tolerance policy, assigns responsibilities and accountability for risk decisions, and addresses decision making in crises and emergencies. Governance arrangements should ensure that the risk- management and internal control functions have sufficient authority, independence, resources, and access to the board.

Risk management

The normative, methodical and organizational principles of the risk policy are predefined on the level of SIX Group. The risk management of SIX Group AG and its subsidiaries is executed in line with this policy under the functional responsibility of



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the CRO of the Group. He/she reports regularly to the BoD, in particular to its Risk committee.

The BoD of SIX SIS AG bears the ultimate legal responsibility for the supervision of the overall risk situation of SIX SIS and regulates the basic principles of risk management. The board thus

- acknowledges and supervises risk governance, organization and management and
- approves the adequacy of the internal control system
- approves the SIX risk policy and any other relevant policies
- acknowledges the risk appetite methodology and approves risk appetite limits
- acknowledges the overall risk situation based on risk reporting from the CRO
- acknowledges risk-based capital and liquidity requirements

The integrated risk management approach is organized along three lines of defense:

- The first line of defense is represented by the business, incl. operational risk units, which are the owners of the risks and are responsible for managing the risks on a day-to-day basis.
- The second line of defense is comprised of the Risk Management unit on SIX level, which are responsible for defining systems, processes, standards and controls. They serve as an independent control of processes and systems and challenge and check risk assessments and control definitions.
- The third line of defense is exercised through Internal and External Audit, which report directly to the BoD. Internal and External Audit are responsible for an assessment of the adequacy and effectiveness of the ICS.

Internal Control System (ICS)

The ICS which, inter alia, ensures compliance with statutory, regulatory and internal company rules and regulations is based on systematic risk analysis. It documents all business-relevant processes, risks, systems and controls. It ensures that all identified risks are controlled according to the defined risk appetite and the defined risk tolerance and consequently are eliminated or are at least mitigated.

The tasks in connection with internal controls are executed by the following bodies:

- BoD of SIX SIS (see above)



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The board should establish a clear, documented risk-management framework that includes the FMI's risk-tolerance policy, assigns responsibilities and accountability for risk decisions, and addresses decision making in crises and emergencies. Governance arrangements should ensure that the risk- management and internal control functions have sufficient authority, independence, resources, and access to the board.

- Senior management of SIX SIS (see above). The senior management prepares reports for the BoD and, if necessary, provides information to it on an ad hoc basis.
- Compliance – for reasons of independence, the Compliance function has been delegated to the Compliance department run by SIX Group Services, another company of SIX. They ensure that internal rules and proceedings are in accordance with regulatory requirements and that management and employees are informed and adhere to these rules. In case of infringements or conflicts, Compliance intervenes and supports management in solving the situation. Compliance maintains an inventory of legal and regulatory risks.
- Internal audit at SIX is independent from the senior management of SIX SIS and reports directly to the Chairman and the Risk Committee of the BoD of SIX. It is equipped with sufficient resources and has an unlimited right of review as well as unrestricted access to all documentation, data carriers and information processing systems (see art. 9 (6) FMIO). The internal audit team cooperates with external audit. There is a coordinated schedule for the audits, audit reports are exchanged and, if necessary, ad hoc notifications of special findings are made.

SIX's internal control functions have qualified personnel and sufficient resources to fulfil their tasks. Compliance and Internal Audit have an unlimited right of review and unrestricted access to all documentation, data carriers, and information processing systems in accordance with requirements of statutory law and best practice. Internal Audit coordinates (audit schedule) and shares its work (reports and ad hoc findings) with the external auditors. It takes a risk-based approach in defining specific areas to be audited.

4.2.7 Key Consideration 7

The board should ensure that the FMI's design, rules, overall strategy, and major decisions reflect appropriately the legitimate interests of its direct and indirect participants and other relevant stakeholders. Major decisions should be clearly disclosed to relevant stakeholders and, where there is a broad market impact, the public.

SIX SIS is an affiliate company of SIX. The latter's shares are owned by a majority of its users of the services of SIX SIS. The Board of the holding company (SIX) is composed of members drawn from these users. Therefore users' interests and sensitivities are reflected in the activities of SIX SIS.

SIX SIS continuously enhances its products and services in line with client requirements and market opportunities. The participants of SIX SIS are involved in



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The board should ensure that the FMI's design, rules, overall strategy, and major decisions reflect appropriately the legitimate interests of its direct and indirect participants and other relevant stakeholders. Major decisions should be clearly disclosed to relevant stakeholders and, where there is a broad market impact, the public.

various bodies on strategic, operative and technical levels. In addition, SIX SIS is part of various working groups such as the Swiss Security Post-Trade Council (Swiss SPTC), Swiss Commission for Financial Standardization (SCFS), Swiss Bankers Association, International Capital Market Association (ICMA) and various bodies related to T2S. SIX SIS has mechanisms in place that allow participants' needs with regard to services provided by it to be surveyed (see art. 8 (5) FMIO).

Major decisions or changes to the regulatory framework are communicated to

- owners (user shareholders) through the "Notice to Shareholders" for the annual general meeting and for each extraordinary general meeting. They are communicated to the users (participants) via the commercial account officers and through various publications (i.e. newsletters).
- to the public via media releases and publication on the public part of the website of SIX SIS and/or the website of SIX; and to participants via messages and/or publication on the participant section of the website of SIX SIS.

4.3 Principle 3: Framework for the comprehensive management of risks

An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.

4.3.1 Key Consideration 1

An FMI should have risk-management policies, procedures, and systems that enable it to identify, measure, monitor, and manage the range of risks that arise in or are borne by the FMI. Risk-management frameworks should be subject to periodic review.

The leading document of SIX SIS with regard to risk management is currently the SIX Risk Policy (SRP). It defines the types of risk specific to SIX Group as a whole and the risk management principles for each risk type. SIX SIS has adopted the relevant passages for its own use (approved by the BoD of SIS) and is fully aligned with SIX Group Risk Management regarding risk types, methods and tools. SIX SIS uses the Three Lines of Defense as governance approach to ensure effective risks management.

In addition, SIX SIS has implemented and maintains a Risk Appetite Framework, which establishes the strategic, organizational, methodological and behavioral basis for managing risk. The Risk Appetite Framework contains the main statements of SIX SIS's risk strategy, which are further specified through appropriate metrics (Key Risk



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Indicators & Information Only Indicators) and consistently operationalized by applying respective limits (Risk Appetite, Risk Tolerance & Risk-bearing Capacity).

In its capacity as a settlement agent, SIX SIS is exposed to credit risk, market risk and liquidity risk arising out of its product and service offerings. Operational risks and strategic risks are also borne and managed by SIX SIS. Further information regarding the various risk types can be found in the respective responses to Principles 4, 5, 7, 15, 16 and 17.

Credit Risk: The operative credit risk management is embedded within the customized SECOM system, which ensures that exposures are only taken up to the maximum approved limits per counterparty. Oversteppings require prior approval in accordance with the competence regulations and can only be processed under the four-eye principle. While limits are defined at the entity level, SECOM provides an aggregated view across entities that are part of a larger financial group.

Liquidity and Market Risk: the policies and procedures of SIX SIS ensure the availability of sufficient liquid resources to meet all payment obligations in the relevant currency on a day-to-day basis as well as under extreme but plausible market conditions. They also support prudent management of SIX SIS's exposures to fluctuations in FX rates, interest rates, and security prices.

Reporting processes are aligned with the Risk Appetite Framework creating a transparent information basis for business decisions and risk steering.

The primary accountability for risk management policies lies with the BoD of SIX SIS, which approves the risk policies and (central) directives and ensures that procedures and systems are implemented correctly and effectively. The BoD is kept informed through regular reporting.

SIX SIS is a separate legal entity with its own BoD. SIX SIS has a Risk Committee that advises the Management Committee on matters as described in Key Consideration 6 of Principle 2.

Risk management policies are reviewed on a regular basis, at least annually, and are updated when necessary. The effectiveness of the risk management procedures and parameters is assessed through regular back-testing, sensitivity analysis, stress-testing and testing of the default management procedures. Additionally, risk methodologies are reviewed on an ongoing basis.

4.3.2 Key Consideration 2

An FMI should provide incentives to participants and, where relevant, their customers to manage and contain the risks they pose to the FMI.

SIX SIS enables participants to manage and contain their risks through online access to the SECOM system with a suite of reports available to monitor exposures and collateral. Participants are able to monitor, manage and reduce the risk they pose to SIX SIS through extensive real-time information about settlement transactions, cash



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and securities positions, credit facilities available as well as the value of collateral available to secure credit lines.

Documentation and on-site training encourages SIX SIS's participants to use the online access to SECOM and thereby manage risk in the best way possible.

Moreover, SIX SIS provides risk incentives to the participants in the following ways:

- Collateral requirements of the participants are directly proportionate to exposures (credit limit utilizations) brought to SIX SIS
 - Credit limits are granted to the participants based on a risk equivalent methodology assigning a conservative loss assumption ("risk equivalent") to each credit exposure type. I.e. the amount of credit granted to a participant differs in respect of the credit exposure type chosen by the participant.
 - The aggregated amount of limits and oversteppings granted to a given participant is capped by the maximum risk appetite defined by the Board of Directors.
 - Collateral haircuts and hence the level of collateralization (in market values) through the participants depends on the quality of the collateral provided by the participants.
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4.3.3

Key Consideration 3

An FMI should regularly review the material risks it bears from and poses to other entities (such as other FMIs, settlement banks, liquidity providers, and service providers) as a result of interdependencies and develop appropriate risk-management tools to address these risks.

SIX SIS continuously assesses the legal, credit, liquidity, general business and operational risks that it bears and poses to other entities. In particular, SIX SIS ensures that credit exposures from all participants are adequately collateralized and applies a risk-based approach to managing its risks.

Pro-cyclicality is also reduced through conservatively defined collateral haircuts, which help prevent collateral values becoming inadequate during periods of market volatility and create an additional buffer for participants.

The risk management tools used to measure, monitor, and manage risks from interdependencies also include liquidity risk management techniques, business continuity arrangements that allow for rapid recovery and resumption of critical operations and services in the event of disruptions, as well as a recovery and wind-down plan.

SIX SIS establishes direct settlement links with an increasing number of other FMIs in order to reduce risks associated with cross-border settlements.



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4.3.4 Key Consideration 4

An FMI should identify scenarios that may potentially prevent it from being able to provide its critical operations and services as a going concern and assess the effectiveness of a full range of options for recovery or orderly wind-down. An FMI should prepare appropriate plans for its recovery or orderly wind-down based on the results of that assessment. Where applicable, an FMI should also provide relevant authorities with the information needed for purposes of resolution planning.

In line with art. 24 of the Financial Market Infrastructure Act (FMIA) and art. 26 NBO SIX SIS annually conducts a dependency risk analysis and defines threshold values for recovery indicators, which set out the recovery objectives for the business processes necessary for maintaining operations. In its recovery plan, SIX SIS assessed various stress scenarios, going beyond those applied in business-as-usual risk management, specifically targeting risk indicators related to regulatory capital (e.g., fulfilment ratio) and liquidity (e.g., stressed liquidity balance of SIX SIS and SIX Securities Services). In addition to SIX SIS specific stress scenarios, such as the default of a placement bank or a custodian, the plan analyzes the impact of cybercrime, the sequential default of several mid-sized banks, and the simultaneous default of major clients of SIX SIS and SIX x-clear as part of a combined SIX Securities Services scenario.

The goal of the recovery plan is to ensure the continued provision of critical operations in the event of financial resources falling close to being depleted or their viability otherwise being threatened. The recovery strategy therefore contributes to maintaining the operations of systemically important services for the Swiss financial market. It comprises several recovery options that allow SIX SIS to recover from potentially severe crisis scenarios. Options foreseen by the recovery plan, such as raising capital by SIX or third parties, suspending dividends, reducing costs, increasing fees, reducing risk-weighted assets through reverse repos, and allocating losses to participants, serve to strengthen SIX SIS's capital position. Other measures, such as the cancellation of customer credit lines and the suspension of pre-financing corporate actions, support the coverage of potential liquidity shortfalls.

The recovery plan is reviewed and submitted to FINMA on a regular basis (art. 24 FMIA / art. 26 NBO) and is subject to regulatory approval.

4.4 Principle 4: Credit risk

An FMI should effectively measure, monitor, and manage its credit exposures to participants and those arising from its payment, clearing, and settlement processes. An FMI should maintain sufficient financial resources to cover its credit exposure to each participant fully with a high degree of confidence. In addition, a CCP that is involved in activities with a more complex risk profile or that is systemically important in multiple jurisdictions should maintain additional financial resources sufficient to cover a wide range of potential stress scenarios that should include, but not be limited to, the default of the two participants and their affiliates that would



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potentially cause the largest aggregate credit exposure to the CCP in extreme but plausible market conditions. All other CCPs should maintain additional financial resources sufficient to cover a wide range of potential stress scenarios that should include, but not be limited to, the default of the participant and its affiliates that would potentially cause the largest aggregate credit exposure to the CCP in extreme but plausible market conditions.

4.4.1 Key Consideration 1

An FMI should establish a robust framework to manage its credit exposures to its participants and the credit risks arising from its payment, clearing, and settlement processes. Credit exposure may arise from current exposures, potential future exposures, or both.

The SIX Credit Risk policy contains the principles and guidelines that establish the general framework applicable to the management of credit risk and counterparty risk at SIX. Together with the corresponding work instructions, it governs all existing rules and procedures for limit applications, counterparty risk assessments, , credit approvals, and the monitoring of counterparty risks.

The Credit Risk Policy adopts a risk-based approach, whereby the frequency of regular review depends on the level of credit risk a counterparty poses to SIX SIS. In addition to scheduled limit reviews, credit exposures are monitored on an ongoing basis to ensure that events which could adversely affect a counterparty's ability to meet its financial obligations towards SIX SIS are identified at an early stage.

Generally, any short-term interim financing at SIX SIS is fully collateralized by cash or marketable securities. Credit extensions are subject to approval by an authority independent from the risk manager preparing the credit application. The approval process follows a clearly defined hierarchy based on the level of credit exposure.

A four-eyes principle is applied throughout the credit extension process. All credit limits granted by SIX SIS are monitored to ensure that the associate risk profile remains in line with SIX SIS's Risk Appetite. The monitoring procedures applied are commensurate with the level of credit risk posed by the participant.

The Credit Risk policy, and the work instructions governing credit risk management are reviewed annually, and on an ad hoc basis when deemed necessary or imperative. They are approved by the respective governing bodies.

4.4.2 Key Consideration 2

An FMI should identify sources of credit risk, routinely measure and monitor credit exposures, and use appropriate risk-management tools to control these risks.

SIX SIS's lending activities are limited to extremely short-term interim financing (one business day) of cash or securities, solely for the purpose of ensuring the efficient processing of transactions. SIX SIS is exposed to credit risk arising from the potential



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An FMI should identify sources of credit risk, routinely measure and monitor credit exposures, and use appropriate risk-management tools to control these risks.

failure of a participant to fulfill its repayment obligations as contractually agreed. In order to mitigate this risk, SIX SIS grants credit limits for settlement purposes only against pledged collateral in the form of cash or high-quality marketable securities.

SIX SIS performs treasury activities with a selected number of financial institutions. Although the selection criteria for credit counterparties are strict, these activities inherently involve counterparty risk. This risk arises when the treasury department:

- performs overnight money market placements to earn interest income overnight;
- enters into forex transactions to convert foreign currency payments in the spot market;
- or performs repo transactions with other banks to either invest excess cash against collateral or obtain securities to meet collateral obligations.

Forex and placement limits are managed on an uncollateralized basis and are assumed to carry the full default risk of the respective counterparty. This risk is mitigated by requiring a high-grade minimum credit rating and by applying nominal exposure limits. Counterparty risk from repo transactions is mitigated through the receipt of highly liquid and highly rated securities from the cash taker.

The Enterprise risk framework incorporates a risk equivalent approach. The primary metric for measuring credit exposure is a conservative estimate of potential credit loss the event of counterparty default, factoring in collateral and other mitigants.

The credit exposure is measured and monitored in a real-time basis through the automated credit facility system SECOM. The collateral is revalued at least daily. In addition, various stress tests are conducted, simulating movements in collateral values under numerous stress scenarios.

SIX SIS has adopted a risk-based monitoring process for its participants. This includes daily monitoring of CDS spread and equities prices..

SIX SIS operates a Real-Time Gross Settlement system (RTGS). A Delivery-versus-Payment (DVP) mechanism is in place for Swiss francs payments processed through participants' Swiss Interbank Clearing (SIC) accounts. In such cases, credit risk is eliminated, as transactions are processed only if sufficient funds are available in the account. For the cross-border business, and for participants using the SIX SIS SIC account, SIX SIS offers trade pre-financing services exclusively on a covered basis. For such trades, the received securities (RVP) or funds (DVP) corresponding to the pre-advanced leg are held in a suspense account in favor of SIX SIS. Any residual exposure is secured by collateral, subject to conservative haircuts. In addition, under the GTC of SIX SIS, the institution holds a lien and foreclosure right over all securities in custody or booked to the participant's account as the participant's own holdings.



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4.4.3 Key Consideration 3

A payment system or SSS should cover its current and, where they exist, potential future exposures to each participant fully with a high degree of confidence using collateral and other equivalent financial resources (see Principle 5 on collateral). In the case of a DNS payment system or DNS SSS in which there is no settlement guarantee but where its participants face credit exposures arising from its payment, clearing, and settlement processes, such an FMI should maintain, at a minimum, sufficient resources to cover the exposures of the two participants and their affiliates that would create the largest aggregate credit exposure in the system.

SIX SIS does not operate a DNS payment system and is not exposed to any other credit risk not already described in Key Consideration 4.2.

4.4.4 Key Consideration 4

A CCP should cover its current and potential future exposures to each participant fully with a high degree of confidence using margin and other prefunded financial resources (see Principle 5 on collateral and Principle 6 on margin). In addition, a CCP that is involved in activities with a more- complex risk profile or that is systemically important in multiple jurisdictions should maintain additional financial resources to cover a wide range of potential stress scenarios that should include, but not be limited to, the default of the two participants and their affiliates that would potentially cause the largest aggregate credit exposure for the CCP in extreme but plausible market conditions. All other CCPs should maintain additional financial resources sufficient to cover a wide range of potential stress scenarios that should include, but not be limited to, the default of the participant and its affiliates that would potentially cause the largest aggregate credit exposure for the CCP in extreme but plausible market conditions. In all cases, a CCP should document its supporting rationale for, and should have appropriate governance arrangements relating to, the amount of total financial resources it maintains.

Key Consideration 4.4 is not applicable to SIX SIS because it is not a CCP.

4.4.5 Key Consideration 5

A CCP should determine the amount and regularly test the sufficiency of its total financial resources available in the event of a default or multiple defaults in extreme but plausible market conditions through rigorous stress testing. A CCP should have clear procedures to report the results of its stress tests to appropriate decision makers at the CCP and to use these results to evaluate the adequacy of and adjust its total financial resources. Stress tests should be performed daily using standard and predetermined parameters and assumptions. On at least a monthly basis, a CCP should perform a comprehensive and thorough analysis of stress testing scenarios, models, and underlying parameters and assumptions used to ensure they are appropriate for determining the CCP's required level of default protection in light of current and evolving market conditions. A CCP should perform this analysis of stress testing more frequently when the products cleared or markets served



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display high volatility, become less liquid, or when the size or concentration of positions held by a CCP's participants increases significantly. A full validation of a CCP's risk-management model should be performed at least annually.

Key Consideration 4.5 is not applicable to SIX SIS because it is not a CCP.

4.4.6 Key Consideration 6

In conducting stress testing, a CCP should consider the effect of a wide range of relevant stress scenarios in terms of both defaulters' positions and possible price changes in liquidation periods. Scenarios should include relevant 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.

Key Consideration 4.6 is not applicable to SIX SIS because it is not a CCP.

4.4.7 Key Consideration 7

An FMI should establish explicit rules and procedures that address fully 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 FMI. These rules and procedures should address how potentially uncovered credit losses would be allocated, including the repayment of any funds an FMI may borrow from liquidity providers. These rules and procedures should also indicate the FMI's process to replenish any financial resources that the FMI may employ during a stress event, so that the FMI can continue to operate in a safe and sound manner.

SIX SIS has developed comprehensive default management procedures, which ensure that SIX SIS can continue to operate and meet its obligations to non-defaulting participants in the event of a participant's default.

Generally, the risk that SIX SIS faces through substantial credit losses as a result of a participant default is minimized by granting credit lines on a covered basis (with the exception of uncovered treasury activities). In case of a default of a treasury counterparty, the resulting credit losses have to be borne by SIX SIS. In such a case, the credit risk is mitigated by high-grade minimum rating requirements and conservative nominal limits limited in size in relation to SIX SIS's capital.

4.5 Principle 5: Collateral

An FMI that requires collateral to manage its or its participants' credit exposure should accept collateral with low credit, liquidity, and market risks. An FMI should also set and enforce appropriately conservative haircuts and concentration limits.



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4.5.1 Key Consideration 1

An FMI should generally limit the assets it (routinely) accepts as collateral to those with low credit, liquidity, and market risks.

The acceptance of a specific asset as collateral is governed by the lending norms of SIX SIS. In principle, SIX SIS only accepts collateral in the form of cash in selected highly liquid currencies and securities mentioned in the list of collateral eligible for SNB repos (SNB GC basket). Such securities fulfil stringent requirements with regard to credit rating and liquidity.

To avoid wrong-way-risk, commercial bank guarantees and any security of which the issuer is a bank or other credit institution is in principle not accepted as collateral. However, bonds issued by supranational banks or development banks as well as covered bonds that have a low default correlation with the issuing bank may on a case-by-case basis be accepted as collateral. Moreover, SIX SIS does not allow its members to provide their own issues as collateral. The lending norms of SIX SIS provide further details on eligible collateral and haircuts. They are reviewed at on an annual basis.

Collateral assets are considered at their lending value (market value minus a conservative haircut according to the collateral type). SIX SIS has the right to recall the collateral eligibility of any single asset at any time even though the respective asset belongs to a generally eligible collateral type.

To ensure sufficient diversification of the collateral and thus allow its liquidation without significant market impact, SIX SIS has established maximum concentration limits with regard to the issue volume of bonds.

4.5.2 Key Consideration 2

An FMI should establish prudent valuation practices and develop haircuts that are regularly tested and take into account stressed market conditions.

The collateral revaluations (mark-to-market) are performed automatically multiple times a day in SIX SIS's collateral management system. SIX SIS has the discretion to decide which assets may be deposited as collateral and that certain assets may be excluded as collateral. So when – in the opinion of SIX SIS – market prices do not represent the true value of the respective collateral, SIX SIS is authorized to declare such assets as non-eligible or to set higher haircuts for them. SIX SIS has the right to change its haircuts at any time and with immediate effect.

The haircuts of SIX SIS are validated on a daily basis to test whether the haircuts applied by SIX SIS are sufficient even considering stressed market conditions in the look-back-period as well as potential market illiquidity.



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4.5.3 Key Consideration 3

In order to reduce the need for procyclical adjustments, an FMI should establish stable and conservative haircuts that are calibrated to include periods of stressed market conditions, to the extent practicable and prudent.

The haircuts of SIX SIS consider stressed market conditions and are oriented towards the standard supervisory haircuts determined by FINMA in margin nos. 208-211 of the Circular 2017/7 Credit risk – banks.

The haircut calibration methodology of SIX SIS consists of an exponentially weighted moving average (EWMA) VaR model on one hand, and a historical as well as hypothetical stress testing framework on the other. The inclusion of stressed market conditions in the calibration methodology ensures an adequate handling of procyclicality issues. Before setting the final haircuts in the lending norms, the calibrated haircut values are backtested against historical prices and a VaR measure, which includes a 25% stressed VaR component, in order to ensure that the set haircuts are conservative enough to withstand stressed market conditions and to comply with regulatory requirements. Additionally, the potential procyclicality of the haircuts is evaluated by means of a regular haircut validation. The results of these validations have shown that the haircuts of SIX SIS are very conservative so that the issue of procyclicality is avoided.

4.5.4 Key Consideration 4

An FMI should avoid concentrated holdings of certain assets where this would significantly impair the ability to liquidate such assets quickly without significant adverse price effects.

In order to ensure that the collateral of SIX SIS remains sufficiently diversified to allow its liquidation without a significant market impact, SIX SIS has established issue-specific maximum concentration limits. Such concentration limits are applicable for all bond collaterals. They are based on the face value of a bond and set as a percentage of the respective outstanding amount.

Collateral exceeding a concentration limit has to be replaced by the respective participant such that the concentration limit is met after the replacement.

The risk policies and procedures applicable to SIX SIS, including those for collateral management, are reviewed on a yearly basis.

4.5.5 Key Consideration 5

An FMI that accepts cross-border collateral should mitigate the risks associated with its use and ensure that the collateral can be used in a timely manner.

In relation to cross-border collateral, SIX SIS is exposed to market risk, country risk, issuer risk and legal risk. The collateral of SIX SIS participants are directly held at SIX



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An FMI that accepts cross-border collateral should mitigate the risks associated with its use and ensure that the collateral can be used in a timely manner.

SIS. However, SIX SIS accepts collateral denominated in foreign currencies or collateral whose issuer is established abroad.

According to its lending norms, SIX SIS only accepts securities denominated in jurisdictions with low country risks. In addition there is no obstacle to the availability and the timely currency conversion of the collateral. The potential foreign-exchange risk of collateral positions is taken into account through the application of adequate haircut increments.

SIX SIS has defined high standards when it comes to the choice of their sub-custodians. As part of the risk assessment SIX performs a financial analysis by use of a risk scorecard to determine a credit rating. As a minimum selection criterion, a custodian has to have a minimum credit rating of A-, whenever possible.

While a detailed risk assessment is performed for all new custodian relationships, SIX applies a risk-based approach when reviewing the risk profile of existing sub-custodians. For this purpose, each sub-custodian is allocated to one of two exposure categories A (low exposure) or B (high exposure). The classification ensures that sub-custodians with higher exposure for SIX are reviewed and monitored more frequently in order to ensure that any evolving risks are identified at an early stage.

4.5.6

Key Consideration 6

An FMI should use a collateral management system that is well-designed and operationally flexible.

Collateral management system design

The scope of the collateral management system of SIX SIS comprises the connection to participants and external collateral locations, the assessment of collateral in relation to acceptance criteria, the deposit and substitution of collateral, the application of concentration limits, the automated computation and validation of collateral requirements, collateral valuation, and collateral inadequacy notices. Furthermore, the collateral management system tracks the extent of reuse of collateral (both cash and non-cash).

Operational flexibility

The monitoring and management of collateral positions is conducted in near-real time by the processing system (SECOM), the functionality of which accommodates the timely deposit, withdrawal, substitution, and liquidation of collateral.

The collateral management is monitored by Risk Management Operations, whose staffing levels are regarded as adequate even in times of market stress.



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4.6 Principle 6: Margin

A CCP should cover its credit exposures to its participants for all products through an effective margin system that is risk-based and regularly reviewed.

Principle 6 does not apply to SIX SIS because it is not a CCP.

4.7 Principle 7: Liquidity risk

An FMI should effectively measure, monitor, and manage its liquidity risk. An FMI should maintain sufficient liquid resources in all relevant currencies to effect same-day and, where appropriate, intraday and multiday settlement of payment obligations with a high degree of confidence under a wide range of potential stress scenarios that should include, but not be limited to, the default of the participant and its affiliates that would generate the largest aggregate liquidity obligation for the FMI in extreme but plausible market conditions.

4.7.1 Key Consideration 1

An FMI should have a robust framework to manage its liquidity risks from its participants, settlement banks, nostro agents, custodian banks, liquidity providers, and other entities.

SIX SIS manages its liquidity risks according to its liquidity concept, which determines the procedures and tools to identify, measure and manage liquidity risks. The liquidity concept defines relevant liquidity risks, available resources, monitoring tools and escalation procedures in case of liquidity stress phases including the default of the participant causing the largest payment obligation for SIX SIS.

Liquid resources and liquidity demands are measured and monitored on a daily basis through SECOM and by a liquidity risk module. The monitoring comprises all nostro positions at sub-custodians and cash correspondent banks in all currencies, liquid securities collateral as well as the prospective liquidity demand arising from securities settlements. SIX SIS also monitors all vostro positions from its participants including cash collateral placements in all currencies. SIX SIS applies conservative haircuts on the liquidity positions in order to account for liquidity outflows in stress scenarios. The resulting liquidity position is monitored on a daily basis and measured against a pre-defined risk appetite limit and risk tolerance limit in order to be able to always have sufficient liquidity available to effect payments when due.

The selection of liquidity stress scenarios is not only based on the regulatory requirements, as stated in Principle 7 PFMI and Art. 29 NBO, but also on a risk inventory that aims to provide a systematic and consistent reflection of the external counterparties the default of whom may potentially impose liquidity risks on SIX SIS.

Liquidity stress test scenarios include the default of the participant or participant group causing the largest payment obligation for SIX SIS under stressed but plausible



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market conditions as well as the default of the major liquidity providers in several currencies.

4.7.2 Key Consideration 2

An FMI should have effective operational and analytical tools to identify, measure, and monitor its settlement and funding flows on an ongoing and timely basis, including its use of intraday liquidity.

The conceptual liquidity framework of SIX SIS is supported by an operational liquidity planning tool at the Treasury department and a liquidity risk module governed by the risk management department.

The liquidity planning tool allows SIX SIS to monitor nostro cash positions at correspondent banks and settlement agents in real time. The same applies to vostro cash positions of its participants. Moreover, the liquidity planning tool supports the tracking of projected / planned cash flows up to t+4, allowing SIX SIS to conduct proactive and efficient cash management. The main cash flows at SIX SIS are related to settlements, corporate action payments, and repo transactions. The liquidity planning tool can thereby identify liquidity shortfalls in day-to-day business at an early stage. The monitoring is not only limited to end-of-day liquidity, but is also performed on an intraday basis. The Treasury department monitors cash accounts on an ongoing basis, ensuring sufficient settlement liquidity in all markets. The management of cash deadlines and settlement windows is key in this process.

The liquidity risk module used by the risk department performs daily liquidity stress testing to ensure sufficient resources are available to cover extreme but plausible market scenarios. The liquidity module also enables SIX SIS to assess the value of its available liquid assets, taking into account appropriate haircuts on those assets.

4.7.3 Key Consideration 3

A payment system or SSS, including one employing a DNS mechanism, should maintain sufficient liquid resources in all relevant currencies to effect same-day settlement, and where appropriate intraday or multiday settlement, of payment obligations with a high degree of confidence under a wide range of potential stress scenarios that should include, but not be limited to, the default of the participant and its affiliates that would generate the largest aggregate payment obligation in extreme but plausible market conditions.

SIX SIS has various viable liquidity resources which may be used to cover its short-term liquidity requirements under extreme but plausible stress scenarios. Besides its own liquid resources such as cash funded by equity, settlement cash, settled suspense cash and collateral for secured credit lines, SIX SIS may conclude repo transactions (for SNB GC eligible securities collateral) and foreign currency swap transactions under prearranged and reliable funding arrangements. Moreover, SIX, as Grandparent



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Company of SIX SIS, has committed itself to provide additional resources in case of a liquidity shortfall.

The sizing of the liquidity resources – to ensure the liquidity is sufficient at all times to cover the payment obligations of SIX SIS when they fall due – is based on a rigorous stress testing framework in all currencies across settlement cycles. As part of this, extreme but plausible market conditions are assumed, such as:

- the default of the participant (including its affiliates) creating the largest aggregate payment obligation for SIX SIS
- the default of SIX SIS' largest liquidity provider

In addition, liquidity stress tests are conducted under very conservative supplementary assumptions considering liquidity outflow factors.

4.7.4 Key Consideration 4

A CCP should maintain sufficient liquid resources in all relevant currencies to settle securities related payments, make required variation margin payments, and meet other payment obligations on time with a high degree of confidence under a wide range of potential stress scenarios that should include, but not be limited to, 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. In addition, a CCP that is involved in activities with a more-complex risk profile or that is systemically important in multiple jurisdictions should consider maintaining additional liquidity resources sufficient to cover a wider range of potential stress scenarios that should include, but not be limited to, 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.

Key Consideration 7.4 is not applicable to SIX SIS because it is not a CCP.

4.7.5 Key Consideration 5

For the purpose of meeting its minimum liquid resource requirement, an FMI's qualifying liquid resources in each currency include cash at the central bank of issue and at creditworthy commercial banks, committed lines of credit, committed foreign exchange swaps, and committed repos, as well as highly marketable collateral held in custody and investments that are readily available and convertible into cash with prearranged and highly reliable funding arrangements, even in extreme but plausible market conditions. If an FMI has access to routine credit at the central bank of issue, the FMI may count such access as part of the minimum requirement to the extent it has collateral that is eligible for pledging to (or for conducting other appropriate forms of transactions with) the relevant central bank. All such resources should be available when needed.

The main liquidity resources of SIX SIS encompass cash received from its participants in the form of settlement liquidity, collateral pledged to cover for multi-currency



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For the purpose of meeting its minimum liquid resource requirement, an FMI's qualifying liquid resources in each currency include cash at the central bank of issue and at creditworthy commercial banks, committed lines of credit, committed foreign exchange swaps, and committed repos, as well as highly marketable collateral held in custody and investments that are readily available and convertible into cash with prearranged and highly reliable funding arrangements, even in extreme but plausible market conditions. If an FMI has access to routine credit at the central bank of issue, the FMI may count such access as part of the minimum requirement to the extent it has collateral that is eligible for pledging to (or for conducting other appropriate forms of transactions with) the relevant central bank. All such resources should be available when needed.

secured cash credit lines and its equity capital. Cash positions cover all major currencies in the context of SIX SIS's business activities.

All major liquidity positions are either held at the central bank or at creditworthy commercial banks (e.g., sub-custodians). SIX SIS invests excess liquidity in short-term reverse repos.

In respect of securities collateral, SIX SIS only accepts highly liquid securities with low credit and market risk (detailed in the lending norms of SIX SIS), which are mentioned in the list of collateral eligible for SNB repos, and which would hence further qualify for a timely swap into liquidity on the repo market and at the central bank.

In its recovery plan, SIX SIS outlines further liquidity recovery options to bridge any liquidity gap which might arise in extreme stress scenarios.

4.7.6 Key Consideration 6

An FMI may supplement its qualifying liquid resources with other forms of liquid resources. If the FMI does so, then these liquid resources should be in the form of assets that are likely to be saleable or acceptable as collateral for lines of credit, swaps, or repos on an ad hoc basis following a default, even if this cannot be reliably prearranged or guaranteed in extreme market conditions. Even if an FMI does not have access to routine central bank credit, it should still take account of what collateral is typically accepted by the relevant central bank, as such assets may be more likely to be liquid in stressed circumstances. An FMI should not assume the availability of emergency central bank credit as a part of its liquidity plan.

The liquidity concept of SIX SIS considers a re-use of securities collateral for repos or credit facilities to cover any liquidity need identified by the liquidity stress scenarios.

As mentioned above in Key Consideration 7.5, SIX SIS applies a conservative collateral regime, allowing participants only to pledge highly liquid collateral with low market and credit risk, which also qualifies as SNB repo collateral.

In general, supplemental liquidity resources will only be drawn in very extreme scenarios, i.e. where the liquidity demand cannot be sufficiently covered by the cash reserves of SIX SIS.



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An FMI may supplement its qualifying liquid resources with other forms of liquid resources. If the FMI does so, then these liquid resources should be in the form of assets that are likely to be saleable or acceptable as collateral for lines of credit, swaps, or repos on an ad hoc basis following a default, even if this cannot be reliably prearranged or guaranteed in extreme market conditions. Even if an FMI does not have access to routine central bank credit, it should still take account of what collateral is typically accepted by the relevant central bank, as such assets may be more likely to be liquid in stressed circumstances. An FMI should not assume the availability of emergency central bank credit as a part of its liquidity plan.

The availability of emergency central bank credit is not considered in the liquidity stress test of SIX SIS.

4.7.7 Key Consideration 7

An FMI should obtain a high degree of confidence, through rigorous due diligence, that each provider of its minimum required qualifying liquid resources, whether a participant of the FMI or an external party, has sufficient information to understand and to manage its associated liquidity risks, and that it has the capacity to perform as required under its commitment. Where relevant to assessing a liquidity provider's performance reliability with respect to a particular currency, a liquidity provider's potential access to credit from the central bank of issue may be taken into account. An FMI should regularly test its procedures for accessing its liquid resources at a liquidity provider.

The qualifying liquidity available to SIX SIS originates from its participants, posting cash for settlement purposes or in the form of liquid credit facility collateral. As a supplemental means for receiving liquidity in multiple currencies, prearranged funding arrangements with external counterparties are maintained to perform foreign currency swap transactions. All such counterparties are also participants of SIX SIS which undergo initial assessments and regular reviews. Moreover, SIX SIS regularly tests the prearranged funding arrangements for accessing liquidity at the respective liquidity providers.

In addition, SIX SIS has direct access to a central bank facility at the SNB. This arrangement allows SIX SIS to pledge SNB GC collateral with the central bank and receive liquidity in return, should the repo market be unavailable for any reason.

4.7.8 Key Consideration 8

An FMI with access to central bank accounts, payment services, or securities services should use these services, where practical, to enhance its management of liquidity risk.

Practically all inhouse transactions of SIX SIS are settled in central bank money via SIC (SNB),. For cross-border transactions, SIX SIS uses its direct CSD-connections, sub-custodians or cash correspondent banks.



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4.7.9 Key Consideration 9

An FMI should determine the amount and regularly test the sufficiency of its liquid resources through rigorous stress testing. An FMI should have clear procedures to report the results of its stress tests to appropriate decision makers at the FMI and to use these results to evaluate the adequacy of and adjust its liquidity risk-management framework. In conducting stress testing, an FMI should consider a wide range of relevant scenarios. Scenarios should include relevant 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. Scenarios should also take into account the design and operation of the FMI, include all entities that might pose material liquidity risks to the FMI (such as settlement banks, nostro agents, custodian banks, liquidity providers, and linked FMIs), and where appropriate, cover a multiday period. In all cases, an FMI should document its supporting rationale for, and should have appropriate governance arrangements relating to, the amount and form of total liquid resources it maintains.

SIX SIS assesses the adequacy of its liquidity resources (liquidity waterfall) in all currencies by means of daily liquidity stress testing. As part of this, SIX SIS assumes the default of the participant (including its affiliates) causing the highest aggregate liquidity demand under extreme but plausible market conditions. The stressed liquidity demand is calculated based on net RVP-settlements of the defaulting participant per security, currency and settlement day, mainly originating from the cross-border business.

Early warning indicators as well as limits and subsequent escalation procedures have been put in place. Breaches of early warning indicators are immediately escalated in accordance with procedures to respective decision makers, including a reassessment of the level of liquidity resources. The results of the daily liquidity stress tests are reported on a monthly basis being a part of the regulatory reporting to the SNB and FINMA and a part of the management reporting to decision makers such as the management committee and the risk committee of SIX SIS.

A periodical risk inventory aims to provide a systematic and consistent reflection of the stress events that may potentially impose liquidity stress on SIX SIS. In this context, SIX SIS has considered some other stress scenarios (than participant default scenarios) that might possibly threaten the viability of SIX SIS in respect of liquidity. However, such other stress scenarios are of minor relevance and do not involve a level of liquidity risk that would justify a daily monitoring and the implementation of corresponding daily liquidity stress tests respectively.



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4.7.10 **Key Consideration 10**

An FMI should establish explicit rules and procedures that enable the FMI to effect same-day and, where appropriate, intraday and multiday settlement of payment obligations on time following any individual or combined default among its participants. These rules and procedures should address unforeseen and potentially uncovered liquidity shortfalls and should aim to avoid unwinding, revoking, or delaying the same-day settlement of payment obligations. These rules and procedures should also indicate the FMI's process to replenish any liquidity resources it may employ during a stress event, so that it can continue to operate in a safe and sound manner.

SIX SIS has established internal default procedures outlining the plan of actions in a default event as well as the respective responsibilities. This also includes the establishment of contact with the national regulators.

The default procedures address any unforeseen liquidity shortfall aiming to avoid an unwinding, revoking, or delaying of payment obligations. The default procedures are regularly tested and assessed via test cases. Further information can be found in the answers to Principle 13.

In the event of uncovered liquidity shortfalls the recovery plan of SIX SIS sets forth the procedures and measures to address such shortfalls and for replenishing the liquidity resources (e.g. make use of instruments for receiving additional liquidity etc.).

The established rules and procedures enable SIX SIS to fulfil its payment obligations at all times when they are due, even in times of market stress scenarios, so that it can continue to operate in a safe and sound manner.

4.8 **Principle 8: Settlement finality**

An FMI should effectively measure, monitor, and manage its liquidity risk. An FMI should provide clear and certain final settlement, at a minimum by the end of the value date. Where necessary or preferable, an FMI should provide final settlement intraday or in real time.

4.8.1 **Key Consideration 1**

An FMI's rules and procedures should clearly define the point at which settlement is final.

The settlement procedure is Simultaneous Final and Irrevocable Delivery Versus Payment (SFIDVP) and executed in real time. This process involves the rapid, secure and properly recorded transfer of a securities position from the seller to the buyer with simultaneous payment from the buyer to the seller. The booking of orders on a trade-by-trade basis serves to significantly enhance efficiency.

SIX SIS settles transactions on a true DVP basis in their own SECOM system and in T2S. Trades only settle if both securities and cash are available. Cash and securities are booked simultaneously and irrevocably. Real-time online processing is a matter of



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An FMI's rules and procedures should clearly define the point at which settlement is final.

providing real-time notifications on trade status to participants. These status intimations provide participants with information reflecting the most current status of the transactions.

Regarding securities kept in final custody outside of Switzerland, revocability depends on the relevant market. If and as long as SIX SIS can revoke vis-à-vis a CSD or a sub-custodian, the participant can instruct a revocation. In markets where settlement finality exists, the revocation of instructions is no longer possible when settlement is final.

Regarding settlement finality, the legal set-up is as follows (see also art. 62 lit. 4 and 5 FMIA): Relevant for the finality of instructions regarding securities in the relation of SIX SIS to its participant are sec. 34c GTC SIX SIS and the information of the security settlement system SECOM and T2S. The transfer of securities positions effected due to an instruction is completed when a custody account has been credited accordingly. The transfer is final with the credit; the disposing participant loses its rights to the intermediated security that was disposed of (sec. 34c lit. a GTC SIX SIS).

The revocability of instructions regarding Swiss intermediated securities is governed by art. 88 FMIA in conjunction with art. 27 Swiss Banking Act, art. 20 FISA as well as sec. 34 lit. a and b GTC SIX SIS. An instruction of a participant shall be legally binding and effective against third parties even in the event of winding-up proceedings against the instructing participant, provided that the instruction was accepted by SIX SIS's system before the commencement of such proceedings or it was accepted by SIX SIS's system after the commencement of such proceedings and carried out on the day of commencement, if SIX SIS can prove that it was not aware, nor should have been aware, of the commencement of such proceedings (sec. 34b lit. b GTC SIX SIS repeating art. 20 Federal Intermediated Securities Act). Art. 20 FISA (and sec. 34b lit. b GTC SIX SIS) correlates with art. 6 EU Directive 98/26 on Settlement Finality in Payment and Securities Settlement Systems.

Regarding instructions concerning securities kept in final custody outside of Switzerland, the revocability depends on the relevant market. If and as long as SIX SIS can revoke vis-à-vis a CSD or a sub-custodian, the participant can instruct a revocation (see sec. 34b lit. c GTC SIX SIS).

Finality and revocability regarding money instructions are governed by sec. 38 lit. e and f GTC SIX SIS: Payment instructions issued by a participant become irrevocable as soon as the payment amount has been debited to the instructing participant's account. When the payment amount is credited to the account of the payee participating in SIX SIS, the payment becomes final.

The GTC SIX SIS are publicly available on the website of SIX SIS.



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4.8.2 Key Consideration 2

An FMI should complete final settlement no later than the end of the value date, and preferably intraday or in real time, to reduce settlement risk. An LVPS or SSS should consider adopting RTGS or multiple-batch processing during the settlement day.

The Swiss market is a T+2 market. All securities tradable on SIX Swiss Exchange and SIX Structured Products Exchange and settling through SIX SIS follow this cycle. Although the settlement cycle for off-exchange trades is freely negotiable, most trades follow the standard T+2 cycle. This means the Swiss settlement cycle is harmonized with other major European markets while SIX SIS has been processing settlements in T2S since June 2015.

The settlement day in T2S begins on S-1 in the evening. All transactions that have been matched and released at this time are sent for settlement. There is a "night time settlement" and a "real-time settlement". The "night time settlement" takes place in several cycles. Within each cycle there are several sequences. Participants that communicate directly with T2S (DCP) receive reports with the settlement confirmations or status intimations after each sequence. With "real-time settlement", the reports are sent in real time after they have been successfully settled by T2S.

As the Swiss market is highly automated with a settlement rate of nearly 100%, SIX SIS does not process any manual interventions. Incorrect transactions are rejected in real time and a SWIFT message with the reason for the rejection will be sent to the participant at the same time.

SIX SIS has not experienced any deferral of final settlement to the next business day that was not covered by its rules, procedures or contracts.

SIX SIS provides real-time notifications on the trade status to participants. Final settlement is confirmed by MT544/545/546/547 in real time.

4.8.3 Key Consideration 3

An FMI should clearly define the point after which unsettled payments, transfer instructions, or other obligations may not be revoked by a participant.

The participant can revoke instructions sent to SIX SIS until the moment at which SIX SIS debits the participant's custody account pursuant to the instruction. If the participant revokes an instruction after the custody account has been debited, SIX SIS shall not respond to this revocation (see sec. 10 and sec. 34a GTC SIX SIS).

SIX SIS does not allow unilateral cancellation after the matched status has been reached. Deletions after matching have to be instructed by both parties (bilateral cancellation).



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4.9 Principle 9: Money settlements

An FMI should conduct its money settlements in central bank money where practical and available. If central bank money is not used, an FMI should minimise and strictly control the credit and liquidity risks arising from the use of commercial bank money.

4.9.1 Key Consideration 1

An FMI should conduct its money settlements in central bank money, where practical and available, to avoid credit and liquidity risks.

In its home market of Switzerland, SIX SIS settles payments in CHF via sight deposits with the SNB. Transactions in foreign currencies processed "inhouse" by SIX SIS in its role as a CSD are settled via commercial bank money accounts of the participants with SIX SIS. Transaction in T2S settle via the T2S dedicated cash account (DCA) of SIX SIS or via the direct DCA of the participant (EUR only).

Securities transactions with international custodians are covered over a network of CSD-links and depository banks. Cash settlements for such transactions in foreign currencies are therefore mainly conducted through cash accounts with correspondent banks.

SIX SIS settles in central bank money where access to the central bank is available and commercially reasonable.

4.9.2 Key Consideration 2

If central bank money is not used, an FMI should conduct its money settlements using a settlement asset with little or no credit or liquidity risk.

For international settlements, SIX SIS uses commercial bank money held with CSDs and custodians that are themselves regulated and subject to strict selection criteria, as well as regular creditworthiness checks conducted by SIX SIS.

For further information about the international custodian links, please refer to the replies to Principle 16.

4.9.3 Key Consideration 3

If an FMI settles in commercial bank money, it should monitor, manage, and limit its credit and liquidity risks arising from the commercial settlement banks. In particular, an FMI should establish and monitor adherence to strict criteria for its settlement banks that take account of, among other things, their regulation and supervision, creditworthiness, capitalisation, access to liquidity, and operational reliability. An FMI should also monitor and manage the concentration of credit and liquidity exposures to its commercial settlement banks.



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Before selecting a custodian, an initial credit review is performed by SIX SIS. The custodians are subject to regular credit verification procedures.

To avoid cluster risks in the daily business, large cash balances remaining at the end of the day can be divided up into smaller amounts and deposited overnight with selected banks (cash sweep instructions). These banks are also subject to strict credit assessments. The granting of the respective investment limits is conducted according to the treasury regulation of SIX SIS.

According to sec. 43 lit. b GTC SIX SIS, every participant of SIX SIS shall bear a proportional share of the effects of economic and legal consequences on the total balances of SIX SIS in the country of the currency in question or the investments as a result of official measures. Hence, SIX SIS may pass on potential losses to its participants if there is a failure of any of its settlement banks.

4.9.4 Key Consideration 4

If an FMI conducts money settlements on its own books, it should minimise and strictly control its credit and liquidity risks.

SIX SIS manages its credit and liquidity risks by carefully selecting and monitoring its custodians and avoiding cluster risk. In order to conduct crossborder settlements, the participants of SIX SIS have to deposit the necessary cash amounts with the respective custodian or correspondent bank of SIX SIS first. In addition, the cross border settlements of the participants are subject to a settlement line, which limits the amount of settlements. In case of a lack of funds on the settlement day, the corresponding counter legs of the transaction are booked into a suspense account, therefore eliminating credit risk for SIX SIS.

4.9.5 Key Consideration 5

An FMI's legal agreements with any settlement banks should state clearly when transfers on the books of individual settlement banks are expected to occur, that transfers are to be final when effected, and that funds received should be transferable as soon as possible, at a minimum by the end of the day and ideally intraday, in order to enable the FMI and its participants to manage credit and liquidity risks.

The legal agreements with the custodians of SIX SIS contain provisions about the timing of money settlements and the laws of the relevant jurisdictions support the conduct of transfers and finality (Settlement Finality Directive, Insolvency Law).

Provisions about the timing of money settlements are primarily governed by local market practice and the rules of the payment system in the respective jurisdictions.

Within the opening times of the various national payment systems, the money transfers of SIX SIS can basically be conducted at any time, i.e. except for the effect of time zone differences, money transfers can always be conducted intraday.



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4.10 Principle 10: Physical deliveries

An FMI should clearly state its obligations with respect to the delivery of physical instruments or commodities and should identify, monitor, and manage the risks associated with such physical deliveries.

4.10.1 Key Consideration 1

An FMI's rules should clearly state its obligations with respect to the delivery of physical instruments or commodities.

SIX SIS defines the guidelines and all operational aspects for the settlement of national and international securities transactions in its Operational Market Guides. The GTC of SIX SIS contain rules about the issuance, condition, and deliverability of physical instruments (sec. 14 seqq.).

SIX SIS's internal control processes and work procedures define the process of remittance and withdrawal of physical instruments as well as the process of ownership transfer.

4.10.2 Key Consideration 2

An FMI should identify, monitor, and manage the risks and costs associated with the storage and delivery of physical instruments or commodities.

SIX SIS has strict internal controls in place to ensure the four-eyes principle is applied to all processes associated with the storage and delivery of physical instruments. Regular inventory inspections and reconciliations take place to ensure the integrity and physical verification of securities held in the vault. Internal Audit regularly reviews and assesses these processes.

SIX SIS has insurance policies in place to cover losses of physical securities.

4.11 Principle 11: Central securities depositories

A CSD should have appropriate rules and procedures to help ensure the integrity of securities issues and minimise and manage the risks associated with the safekeeping and transfer of securities. A CSD should maintain securities in an immobilised or dematerialised form for their transfer by book entry.



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4.11.1 Key Consideration 1

A CSD should have appropriate rules, procedures, and controls, including robust accounting practices, to safeguard the rights of securities issuers and holders, prevent the unauthorised creation or deletion of securities, and conduct periodic and at least daily reconciliation of securities issues it maintains.

SIX SIS administers Swiss securities in Switzerland and abroad according to art. 973a Swiss Code of Obligations:

- SIX SIS holds fungible certificated securities of different participants in custody together with other participants' holdings, except if the participant explicitly requests separate safekeeping of its certificated securities.
- When a participant delivers fungible certificated securities (own and client holdings) to SIX SIS for collective custody, the participant or its client on whose behalf the custody account is held acquires a right of co-ownership over all certificated securities of the same kind held in collective custody. The participant's interest shall be proportional to the nominal value or, failing such value, to the quantity of the securities deposited by the participant.

According to art. 973b Swiss Code of Obligations, SIX SIS handles global certificates as follows: A global certificate deposited by a participant and held in safe custody at SIX SIS is a certificated security of the same kind as the rights it represents. The depositors (the participant's clients or the participant with respect to its own holdings) have a co-ownership interest in the global certificate in proportion to their respective interests.

SIX SIS maintains a well-defined and comprehensive system of internal controls and procedures to avoid operational risks of fraud and negligence. SIX SIS is a FMI under Swiss legislation and therefore internal audits in terms of operational risks are requested and are part of regular reviews of the ICS by the Internal Audit department. All physical vault inventories are checked and reconciled with client accounts by Internal Control. Reconciliations are reported to Senior Management and Group Internal Audit and audited by external audit annually. Certificates received physically are cross-checked against the database of SIX Financial Information prior to crediting the client's safekeeping account. Should the crosscheck reveal any stolen or lost securities, SIX SIS immediately informs the respective clients. The vault tracking and bookkeeping system is separated from the participants' bookkeeping system and is reconciled daily.

4.11.2 Key Consideration 2

A CSD should prohibit overdrafts and debit balances in securities accounts.

SIX SIS in its function as the Swiss CSD does not allow uncovered short positions in securities accounts. Transfer instructions remain pending until sufficient cover is provided in the money or custody account. If a security position can be partially delivered, SIX SIS may make a partial delivery where this is permitted in the relevant



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market (partial settlement). SIX SIS reports unexecuted or partially executed instructions immediately to the participant concerned. Non-executable or partially executable instructions that have been transmitted to SIX SIS via a stock exchange or a clearing agent shall be reported to the stock exchange or the clearing agent in accordance with the applicable regulation or practice.

4.11.3 Key Consideration 3

A CSD should maintain securities in an immobilised or dematerialised form for their transfer by book entry. Where appropriate, a CSD should provide incentives to immobilise or dematerialise securities.

More than 98% of the Swiss securities market is dematerialized. As per 1 January 2010, the FISA became effective, introducing intermediated securities ("Bucheffekten"). Intermediated securities refer to rights which arise from the credit of securities to a securities account with SIX SIS or any other intermediary. Intermediated securities are created by

- depositing certificates of securities (global certificates, collectively deposited securities); or
- registering uncertificated securities ("Wertrechte") as underlying instruments and simultaneously crediting such intermediated securities to a securities account. The uncertificated securities are (completely dematerialised) securities to be evidenced otherwise than by a certificate (they must be registered by the issuer in the so-called main register maintained by SIX SIS or another intermediary in order to create intermediate securities).

Physical certificates can be immobilized and transferred to SECOM. Physical holdings stored with SIX SIS could be delivered in physical form, although this is not market practice since the Swiss market is mostly dematerialized. Certificates are transferable and physical deliveries are carried out within 24 hours. Only certain companies offer the physical issuance of certificates. It depends on the company whether the shareholder has already been registered or not.

Issuers do not need to bear the cost of physical issuing (printing) when immobilizing or dematerializing the securities. Deferred or relinquished printing will release companies from the obligation to print physical share certificates and deliver them to shareholders in every single case. The share register therefore only prints and delivers securities upon request of the shareholder. In the case of relinquished printing, the company no longer prints and delivers securities regardless of any requests to do so from shareholders. Registered shares accepted for custody by SIX SIS can only be transferred by assignment.



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4.11.4 Key Consideration 4

A CSD should protect assets against custody risk through appropriate rules and procedures consistent with its legal framework.

SIX SIS's vault is a high security area with access restricted to authorized SIX employees. SIX's Legal & Compliance oversees the consistency of rules and procedures within the legal framework. SIX SIS has concrete directives to comply with the corresponding legal framework.

Furthermore, SIX SIS has accounting rules and internal controls in place which properly separate assets. Regular reconciliation ensures the correct safekeeping and swift resolution of any mismatches between inventories.

Physical access, compliance with guidelines and legislation, and state-of-the-art security standards are validated through regular audits across SIX.

4.11.5 Key Consideration 5

A CSD should employ a robust system that ensures segregation between the CSD's own assets and the securities of its participants and segregation among the securities of participants. Where supported by the legal framework, the CSD should also support operationally the segregation of securities belonging to a participant's customers on the participant's books and facilitate the transfer of customer holdings.

SIX SIS operates a fully automated securities vault system and does not hold any of its own assets in its vault. SIX SIS holds fungible certificated securities of different participants in custody together with other participants' holdings, except if a participant explicitly requests separate safekeeping of its certificated securities (see art. 973a (1) Swiss code of obligations). Therefore, client assets can be physically segregated if requested. At the depository level, participants' assets are held in an omnibus account, segregated from the assets of other clients of the depository in accordance with local legal and regulatory requirements.

SIX SIS offers so-called "Separate Safekeeping EVA" as a service for the remittance of items. Service details are decided individually with clients. Remittances and withdrawals can be sent to clients and, on request, to third parties. SIX SIS can digitize documentation and make it digitally accessible to depositors.

Assets belonging to different participants are properly segregated through SIX SIS's bookkeeping system in book-entry form. Client assets are segregated on dedicated vostro accounts. Clients can open multiple vostro accounts to reflect their inhouse segregation needs directly within the SIX SIS bookkeeping system. Transfers of holdings between customers/participants can be done via simple transfer instructions by the participants. Transfers take place gross, simultaneously in cash and securities, in finality, in realtime and in central bank money. Participants receive realtime status intimations as well as daily reconciliation reports of securities and cash positions as well as transactions.



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4.11.6 Key Consideration 6

A CSD should identify, measure, monitor, and manage its risks from other activities that it may perform; additional tools may be necessary in order to address these risks.

SIX SIS provides custody services for clients in Switzerland and abroad. SIX SIS is the national CSD of the Swiss financial market and part of the Swiss Value Chain and Global Custodian, providing complete services for the settlement and custody of national and international securities. No other than the aforementioned core activities is being performed.

4.12 Principle 12: Exchange-of-value settlement systems

If an FMI settles transactions that involve the settlement of two linked obligations (for example, securities or foreign exchange transactions), it should eliminate principal risk by conditioning the final settlement of one obligation upon the final settlement of the other.

4.12.1 Key Consideration 1

An FMI that is an exchange-of-value settlement system should eliminate principal risk by ensuring that the final settlement of one obligation occurs if and only if the final settlement of the linked obligation also occurs, regardless of whether the FMI settles on a gross or net basis and when finality occurs.

The settlement of securities transactions involves a cash component and a securities component. The settlement system used to settle these transactions (SECOM and T2S) ensures DVP. SECOM supports realtime-gross-settlement only. For each single transaction, cash and securities must be available otherwise the DVP will not settle. In case of central bank money involved, securities are blocked on the deliverers' account before sending the cash-settlement to the cash-clearing-system. Once cash-settlement is confirmed, securities are transferred to the buyer. There is no principal risk for SIX SIS.

T2S has different settlement cycles where different settlement-methods are applied. Night-time settlement supports netting whereas daytime has realtime settlement at gross level only. For both, DVP method assures settlement finality on cash and securities side at same time. There is no principal risk for SIX SIS.

The finality of settlement of linked obligations is simultaneous (see Principle 8).

4.13 Principle 13: Participant default rules and procedures

An FMI should have effective and clearly defined rules and procedures to manage a participant default. These rules and procedures should be designed to ensure that the FMI can take timely action to contain losses and liquidity pressures and continue to meet its obligations.



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4.13.1 Key Consideration 1

An FMI should have default rules and procedures that enable the FMI to continue to meet its obligations in the event of a participant default and that address the replenishment of resources following a default.

SIX SIS' default rules and procedures define certain events which are the trigger points to set a participant in default leading to a suspension or termination of participation. The events are defined in sec. 2 GTC SIX SIS, which are publicly available on its website. As can be seen by these definitions, some of these events lead to an automatic default, e.g. a withdrawal of a license of a participant by the corresponding supervisory authority (sec. 2.2 lit. c GTC SIX SIS), while in other cases SIX SIS has discretion in deciding whether an event of default has occurred or not. Trades accepted by SIX SIS' systems before suspension or termination of the participation or before the notice of termination of the participation takes effect will be settled. No new transactions may be instructed after the suspension or termination of participation (sec. 2.2 lit. h GTC SIX SIS).

The determination of a default and the handling of cases of default are governed by a SIX-internal work instruction which particularly governs the organization and competences of the corresponding people, the decision taking and the steps in all phases of a default procedure.

To cover any losses, SIX SIS may rely on the realization of assets/collateral being pledged according to its GTC and the respective pledge agreement. A main goal is the minimization of possible market value losses exceeding haircuts.

4.13.2 Key Consideration 2

An FMI should be well prepared to implement its default rules and procedures, including any appropriate discretionary procedures provided for in its rules.

The SIX Default Management Process defines the responsibilities and roles to be taken in the event of a default of a counterparty. This is of particular importance for the business functions that involve systematically important processes. SIX SIS reviews and tests the default rules and procedures at least annually (see art. 21a (2) in conjunction with 24a (3) NBO).

If a participation expires, SIX SIS informs its regulators FINMA and SNB as well as, within the framework of its contractual obligations, stock exchanges of all types, recognized clearing houses and CSDs with which SIX SIS cooperates (sec. 2.2 lit. j GTC SIX SIS, being publicly available on its website).



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4.13.3 Key Consideration 3

An FMI should publicly disclose key aspects of its default rules and procedures.

Sec. 2.2. lit. h and i of GTC SIX SIS, which are publicly available on its website, give a general outline about the treatment of open transactions and information obligations for SIX SIS. Liens, rights of retention, and rights of set-off, which allow SIX SIS to cover its exposure in the event of a default of a participant, are governed by sec. 48a to 48c GTC SIX SIS.

4.13.4 Key Consideration 4

An FMI should involve its participants and other stakeholders in the testing and review of the FMI's default procedures, including any close-out procedures. Such testing and review should be conducted at least annually or following material changes to the rules and procedures to ensure that they are practical and effective.

SIX SIS does not test its default procedures with its participants and other stakeholders because most of the procedures to be tested are internal procedures and the interactions with participants are limited to communications with the appointed insolvency administrators of the relevant defaulted participants. These administrators are generally persons or entities external to a defaulted participant and as they are never known in advance of a default and only appointed at the time after a default, testing with these persons and entities is unfeasible.

SIX SIS reviews and tests the internal part of the default rules and procedures at least annually (see art. 21a (2) in conjunction with 24a (3) NBO).

Moreover, over the years SIX SIS has dealt with several bankruptcy / insolvency cases of participants which allowed SIX SIS to put in practice its participant default procedures. The internal procedures have proven to be adequate.

4.14 Principle 14: Segregation and portability

A CCP should have rules and procedures that enable the segregation and portability of positions of a participant's customers and the collateral provided to the CCP with respect to those positions.

Principle 14 does not apply to SIX SIS because it is not a CCP.

4.15 Principle 15: General business risk

An FMI should identify, monitor, and manage its general business risk and hold sufficient liquid net assets funded by equity to cover potential general business losses so that it can continue operations and services as a going concern if those losses materialise. Further, liquid net assets should at all times be sufficient to ensure a recovery or orderly wind-down of critical operations and services.



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4.15.1 Key Consideration 1

An FMI should have robust management and control systems to identify, monitor, and manage general business risks, including losses from poor execution of business strategy, negative cash flows, or unexpected and excessively large operating expenses.

General business risk (GBR) is understood at SIX as the potential for losses resulting from ineffective execution of business strategy, unanticipated or sustained negative cash flows, or significant unplanned increases in operating expenses. These risks may stem from both internal and external factors, such as adverse macroeconomic developments, shifts in the competitive landscape, regulatory or political changes, as well as internal strategic missteps or operational inefficiencies. Consequently, General Business Risks encompass a wide range of strategic, legal, investment, custody and operational risks.

All risks at SIX, including GBR are part of the Risk Appetite Statement (RAS) that defines the risk profile that SIX considers acceptable. SIX explicitly defines the types and level of risk it is willing to assume to achieve its business objectives. Risks taken must be in adequate relation to the business model and its expected revenues and within the capacity and capability to absorb and handle unexpected adverse developments. SIX Risk Policy defines the boundaries within which management is expected to operate when pursuing the business strategy.

Within the RAS framework, SIX defines its risk-bearing capacity, sets qualitative and quantitative limits on key financial and operational indicators, establishes metrics to monitor material risk categories, and, where applicable, sets thresholds to detect and manage significant changes in its risk profile.

The Risk Management Cycle for GBR includes risk identification, assessment, control, monitoring, and reporting.

To support this process, SIX SIS uses several tools and methods, including:

- The SIX ERM tool, which documents each identified risk, including scenario analysis, probability, and impact on P&L and liquidity—both before and after mitigation.
- Scenario analysis and stress testing to evaluate potential adverse developments.
- Key Risk Indicators (KRIs) tailored to GBR, which help monitor risk levels and detect changes.
- Business impact assessments integrated into budgeting and strategic planning.
- Thresholds and metrics defined within the Risk Appetite Statement (RAS) to guide acceptable risk levels.
- Business continuity planning and testing to ensure operational resilience.
- Internal and external audits and supervisory reviews for independent assurance of risk management effectiveness.



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An FMI should have robust management and control systems to identify, monitor, and manage general business risks, including losses from poor execution of business strategy, negative cash flows, or unexpected and excessively large operating expenses.

- Insurance.

4.15.2 Key Consideration 2

An FMI should hold liquid net assets funded by equity (such as common stock, disclosed reserves, or other retained earnings) so that it can continue operations and services as a going concern if it incurs general business losses. The amount of liquid net assets funded by equity an FMI should hold should be determined by its general business risk profile and the length of time required to achieve a recovery or orderly wind-down, as appropriate, of its critical operations and services if such action is taken.

Swiss regulations require SIX SIS to hold sufficient equity and liquid net assets to cover losses from business risks (see art. 66 FMIA) taking into account the costs of a voluntary cessation of business or restructuring which must be at least sufficient to cover ongoing operation expenditure for six months (art. 56 (2) FMIO in conjunction with art. 48 (3) FMIO).

SIX SIS exceeds the regulatory requirements and holds sufficient equity and net liquid assets to be able to continue operations and services as a going concern if it incurs general business losses.

Further details can be found in SIX SIS's annual report.

4.15.3 Key Consideration 3

An FMI should maintain a viable recovery or orderly wind-down plan and should hold sufficient liquid net assets funded by equity to implement this plan. At a minimum, an FMI should hold liquid net assets funded by equity equal to at least six months of current operating expenses. These assets are in addition to resources held to cover participant defaults or other risks covered under the financial resources principles. However, equity held under international risk based capital standards can be included where relevant and appropriate to avoid duplicate capital requirements.

SIX SIS has established a recovery plan. The objective of the recovery plan is to ensure the survival of SIX SIS and that the FMI is able to continue to provide its critical processes and services. Recovery options were evaluated in terms of feasibility and the financial, regulatory, operational, and external impact of the options in order to identify potential barriers that could prevent SIX SIS from successfully implementing the respective recovery option in a crisis situation. SIX SIS identified a number of options which are deemed feasible in respect of the timing of implementation and the impact they pose. The options include strengthening the capital base as well as options to improve the liquidity position of SIX SIS.



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An FMI should maintain a viable recovery or orderly wind-down plan and should hold sufficient liquid net assets funded by equity to implement this plan. At a minimum, an FMI should hold liquid net assets funded by equity equal to at least six months of current operating expenses. These assets are in addition to resources held to cover participant defaults or other risks covered under the financial resources principles. However, equity held under international risk based capital standards can be included where relevant and appropriate to avoid duplicate capital requirements.

In its recovery plan, SIX SIS outlines that it holds sufficient liquid net assets to cover at least six months of operating expenses.

4.15.4 Key Consideration 4

Assets held to cover general business risk should be of high quality and sufficiently liquid in order to allow the FMI to meet its current and projected operating expenses under a range of scenarios, including in adverse market conditions.

SIX SIS's capital is primarily held as cash at the SNB or invested in reverse repo transactions against SNB GC collateral. Its investment guidelines are outlined in SIX-internal regulations. The minimum requirements refer to a minimum credit rating and eligibility as central bank basket collateral. This enables SIX SIS to receive liquidity at any time via the Interbank Repo market or via the SNB in case of extreme market events.

The investment criteria are reviewed on a regular basis.

4.15.5 Key Consideration 5

An FMI should maintain a viable plan for raising additional equity should its equity fall close to or below the amount needed. This plan should be approved by the BoD and updated regularly.

Please refer to the replies under Key Considerations 3.4 and 15.3.

4.16 Principle 16: Custody and investment risks

An FMI should safeguard its own and its participants' assets and minimize the risk of loss on and delay in access to these assets. An FMI's investments should be in instruments with minimal credit, market, and liquidity risks.

4.16.1 Key Consideration 1

An FMI should hold its own and its participants' assets at supervised and regulated entities that have robust accounting practices, safekeeping procedures, and internal controls that fully protect these assets.



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SIX has governance documents in place to describe the selection procedure, under which a provider is selected for all or some services in connection with securities settlement and/or cash transactions, custody and asset servicing, and ensure its uniform application in line with objective quality standards and benchmarks in all cases. The selection procedure is executed in stages pursuant to internal guidelines. Changes to the custodian selection criteria need the approval of the Swiss Financial Market Supervisory Authority (FINMA).

SIX SIS applies strict internal processes and uses diligence when selecting and reviewing its custodians and cash correspondent banks. In the selection and review process, SIX SIS especially but not exclusively examines legal, financial, and operational criteria, such as the financial standing of the custodian, asset protection in case of bankruptcy, compliance with AML standards, Business Continuity Management (BCM) requirements, or the quality of the custody services.

Regular due diligence reviews, including on-site visits, take place in order to ensure that the custodian adheres to these quality standards set out in contractually binding custody agreements.

4.16.2 Key Consideration 2

An FMI should have prompt access to its assets and the assets provided by participants, when required.

For securities kept in final custody outside of Switzerland, revocability depends on the relevant market. If and as long as SIX SIS can revoke vis-à-vis a sub-custodian, the participant can instruct a revocation. In the unlikely case of the custodian's bankruptcy, assets in the client's account(s) would be recognized as client assets and would not form part of the liquidation portfolio. Under this main account, segregated sub-accounts are opened on a relationship level, thus client assets are not only segregated from the custodian's own assets but also from assets of other customers.

4.16.3 Key Consideration 3

An FMI should evaluate and understand its exposures to its custodian banks, taking into account the full scope of its relationships with each.

The operational settlement system which SIX SIS uses allows a close-to-real-time view of the risk exposure which SIX SIS faces to any counterparty, including custodian banks, be it in the role of a custodian or be it in the role of a settlement participant or a correspondent bank for overnight cash deposits.

SIX SIS diversifies its custodians in order to avoid concentration risks and has more than 50 local depositories worldwide. In certain markets, assets might even be split between more than one local custodian.



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4.16.4 Key Consideration 4

An FMI's investment strategy should be consistent with its overall risk-management strategy and fully disclosed to its participants, and investments should be secured by, or be claims on, high quality obligors. These investments should allow for quick liquidation with little, if any, adverse price effect.

SIX SIS' investment regulation is consistent with its conservative risk management approach and only allows investments in securities with a low credit, market, and liquidity risk. As a general rule and to ensure that liquidity can be received against these securities at any time, they must be central bank eligible, i.e. part of the SNB GC basket.

Cash is held either at the central bank or is diversified over several highly creditworthy financial institutions. In order to minimize counterparty risk from cash deposits at financial institutions, SIX SIS uses reverse Repos.

The investment criteria are reviewed on a regular basis.

4.17 Principle 17: Operational risk

An FMI should identify the plausible sources of operational risk, both internal and external, and mitigate their impact through the use of appropriate systems, policies, procedures, and controls. Systems should be designed to ensure a high degree of security and operational reliability and should have adequate, scalable capacity. Business continuity management should aim for timely recovery of operations and fulfilment of the FMI's obligations, including in the event of a wide-scale or major disruption.

4.17.1 Key Consideration 1

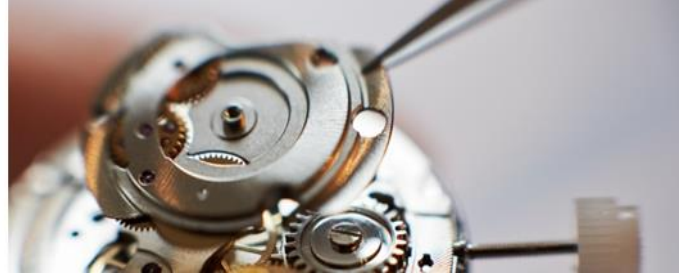
An FMI should establish a robust operational risk-management framework with appropriate systems, policies, procedures, and controls to identify, monitor, and manage operational risks.

The operational risks at SIX SIS are identified according to the Basel Framework definition and structured accordingly. There are no 'single points of failure' identified. Any potential single point of failure would be eliminated through mitigating actions.

SIX SIS has a conservative approach to operational risk management outlined in an operational risk framework with clearly specified principles, roles and responsibilities. The operational risk Framework defines the operational risk management at SIX SIS according to the 'SIX Risk Policy'. The risk appetite statement and risk limits on SIX SIS level are approved by the ExB and the BoD of SIX SIS in coordination with SIX Group.

The operational risk framework considers international standards, such as

- CPMI-IOSCO – Principles for FMIs



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An FMI should establish a robust operational risk-management framework with appropriate systems, policies, procedures, and controls to identify, monitor, and manage operational risks.

- Basel Committee of Banking Supervision – Principles for the Sound Management of Operational Risk
- ECB/CESR – Recommendations for securities settlement systems and recommendations for CCPs in the European Union

Risks posing a potential threat to SIX SIS are periodically identified and (re-)evaluated in a systematic process, or may be triggered through an event (e.g., significant changes, new products, incidents, audit results or information obtained from supervisory authorities). Risk identification is proactively performed along the processes within the responsible organizational unit and considers internal and external incidents, fraudulent or unlawful activities as well as violations of regulations. Particular attention is paid to risks with a potentially severe impact ('Material Risks').

In a systematic review, risks are identified in line with the business processes within the responsible organizational unit. Processes and controls are constantly reviewed for potential weaknesses or deficiencies that might pose a possible risk on SIX SIS. The results of the identification and review process are documented in the Risk Inventory.

The Internal Control System (ICS) of SIX SIS documents all business-relevant processes, risks, systems, and controls and ensures the adequacy and effectiveness of controls via at least yearly ICS Control Assessments. The ICS is periodically reviewed and updated in a systematic process or triggered through an event (e.g. significant changes, new products, risk incidents or audit results). Please also refer Key Consideration 2.6 for further details regarding the ICS.

The monitoring and supervision of operational risk management is performed through reporting along the following instruments that address the need for a proactive management:

- Risk Inventory
- Operational risk Event database
- Key Risk Indicators
- Internal Control System (ICS)
- Business Continuity Management (BCM)

4.17.2 Key Consideration 2

An FMI's BoD should clearly define the roles and responsibilities for addressing operational risk and should endorse the FMI's operational risk-management framework. Systems, operational policies, procedures, and controls should be reviewed, audited, and tested periodically and after significant changes.

The BoD exercises oversight through regular reviews and approvals of the operational risk framework to ensure the safety and solidity of the legal entities. Specifically, this



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An FMI's BoD should clearly define the roles and responsibilities for addressing operational risk and should endorse the FMI's operational risk-management framework. Systems, operational policies, procedures, and controls should be reviewed, audited, and tested periodically and after significant changes.

includes the definition of risk appetite and tolerance limits on FMI level, the principles of operational risk management, roles and responsibilities and key processes.

The operational risk framework is regularly reviewed and adjusted in a timely manner in case of significant changes of the risk situation or in case of changes of markets, economic environment, new products, new activities or new systems. The operational risk framework as well as all respective policies and procedures are reassessed, updated and tested on a regular basis .

The operational risk framework is subject to the following periodical events:

- Internal and external audit reviews
- Assessments of all operational risks
- Assessments of the ICS
- Reviews of the adequacy and effectiveness of internal controls
- Assessments of the operational risk status
- External reviews in accordance with the SNB.

4.17.3 Key Consideration 3

An FMI should have clearly defined operational reliability objectives and should have policies in place that are designed to achieve those objectives.

The core systems of SIX SIS are fully automated. Their guaranteed recovery times in case of a site disaster according to the Business Impact Analysis of SIX are less than two hours and cover the full workload capacity as well. SIX SIS operates redundant processing systems to guarantee high availability of services in the case of disaster. In this context, SIX SIS also operates a warm (ready-to-use) contingency site. The full workload capacity is covered at both sites.

The different services offered by SIX SIS are classified in terms of business-criticality (documented in the BIA and in the SLAs). This classification serves as the basis for the respective reaction and recovery times. The SLAs contain values specifying the agreed level of availability of a service at a particular time. If a malfunction occurs in a system or infrastructure relevant to production, the response time starts as soon as the malfunction is detected.

All critical locations and business functions have been identified and contingency arrangements are in place. SIX SIS ensures that its services operate in accordance with their availability objectives. For services with very high availability requirements, the organizational and technical prerequisites are put in place according to the Business Continuity Strategy of SIX to ensure their availability even in emergency and crisis situations.



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The BCM of SIX, where SIX SIS is included, is regulated in a SIX-internal regulation.

4.17.4 Key Consideration 4

An FMI should ensure that it has scalable capacity adequate to handle increasing stress volumes and to achieve its service-level objectives.

The Corporate Function IT (CIT) at SIX guarantees the capacity as required by the business units. For projects, capacity requirements are defined between the business unit and the IT department. If the capacity utilization is close to the limit, additional capacity is agreed between the business unit and the IT department at the regularly scheduled service meetings.

4.17.5 Key Consideration 5

An FMI should have comprehensive physical and information security policies that address all potential vulnerabilities and threats.

SIX has established a Physical Security Policy, which covers the protection of people, rooms, buildings, perimeters and supply systems as well as the corresponding assets. Compliance with the protection of business secrets and personal data is laid down and verified in cooperation with the Group Compliance Officer.

The protection of SIX staff and customers on SIX premises is robust. In the event of an incident, intervention would be immediate and appropriate. The SIX emergency organization is well established and exercised.

At SIX, standardized security processes, methods, architecture and solutions are implemented based on good practice industry frameworks.

The Information Security regulation and its annexes as established by SIX cover all relevant areas of information security such as:

- Risk management
 - Use of IT services, end-user guidelines etc.
 - Data classification
 - Authorization and authentication
 - Security for the development and operations of IT systems
-



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4.17.6 Key Consideration 6

An FMI should have a business continuity plan that addresses events posing a significant risk of disrupting operations, including events that could cause a wide-scale or major disruption. The plan should incorporate the use of a secondary site and should be designed to ensure that critical information technology (IT) systems can resume operations within two hours following disruptive events. The plan should be designed to enable the FMI to complete settlement by the end of the day of the disruption, even in case of extreme circumstances. The FMI should regularly test these arrangements.

SIX operates a Business Continuity Management (BCM) program, which makes a significant contribution to the stability, reliability and availability of SIX SIS' services. BCM is designed for extreme events, such as natural disasters (e.g. earthquake, flooding), technology-related disasters (e.g. black out, explosion, systems malfunction) or man-made, society-related disasters (e.g. sabotage, cyber-attack, pandemic).

These types of events all have in common that they provoke incapacitation or even the loss of critical resources such as buildings (e.g. data centers, production facilities, administration and office buildings), staff (e.g. single key persons, all workforce), systems/IT (e.g. IT, telephony, building technology/services) and service providers / suppliers (e.g. IT providers, telecommunication providers, utilities providers, outsourcing partners).

SIX regards IT Service Continuity Management (ITSCM) as an separate, complementary discipline due to its subject-specific characteristics and complexity. The BCM and ITSCM lifecycles are closely interlinked. ITSCM is based on the requirements that are identified in the BIA. While BCM considers business-related workarounds for an IT failure, ITSCM focuses on scenarios of unavailability of data centers.

SIX operates redundant production data centers at different locations, designed to act as mutual fallbacks, to guarantee high availability of SIX SIS services in case of a disaster. All data is mirrored in real time on a 24-hour basis, 7 days a week. This setup ensures that the full range of services offered by SECOM can continue to be provided. SNB has approved the SIX SIS contingency concept and locations. Tests are conducted yearly with industry participants and the SNB is informed about the results.

The BCM framework of SIX covers all elements of the generic model as suggested by:

- BS EN ISO 22301:2019 and BS EN ISO 22313:2014;
- the BCI Good Practice Guidelines (GPG), 2018;
- the Standard of Good Practice for Information Security (ISF), 2020.

The primary goal of SIX BCM (where SIS is included) is to protect time-critical processes and functions from negative impacts (i.e. prevention), to alleviate the consequences of negative impacts and to allow recovery of the business (i.e. preparedness) in case of a disaster. SIX SIS takes all actions necessary to ensure that legal and contractual obligations are fulfilled and that reputational damage is minimized.



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An FMI should have a business continuity plan that addresses events posing a significant risk of disrupting operations, including events that could cause a wide-scale or major disruption. The plan should incorporate the use of a secondary site and should be designed to ensure that critical information technology (IT) systems can resume operations within two hours following disruptive events. The plan should be designed to enable the FMI to complete settlement by the end of the day of the disruption, even in case of extreme circumstances. The FMI should regularly test these arrangements.

In the Business Impact Analysis (BIA), the criticality of the SIX SIS business processes and their resources (e.g. applications needed) is determined. This classification serves as the basis for the respective reaction and recovery times. In the Business Continuity Strategy, the business continuity options for restarting time-critical SIS processes are described; risk mitigation measures for all loss scenarios are implemented where necessary.

To be able to react quickly and consistently in the case of a disaster, SIX SIS is embedded in the SIX-wide response structure (emergency and crisis management organization) and is incorporated in the BC plan of SIX as well as in the IT disaster recovery plans and the IT Disaster Recovery Overall Coordination Plan to support SIX-wide outages.

SIX Emergency and crisis management forms a central part of the response structure and executes the plans created in BCM and ITSCM when an event occurs. So, if one of the systems within SIX SIS fails and Incident Management is not sufficient to remedy the fault, the matter will be escalated via the emergency and crisis organization. SIX SIS will initiate the necessary measures, and further steps will be defined within the Emergency and Crisis Organization. In the event of an exceptional situation or crisis, SIX SIS immediately notifies its customers and business partners. This information process is subject to the defined Crisis Management guidelines and processes. Customers are also notified of individual service disruptions in accordance with a defined severity and impact classification.

In order to ensure successful execution of the BC plan and IT Disaster Recovery Plan in the event of a disaster, critical staff and managers of SIX SIS as well as the emergency and crisis management organization are trained. Additionally, the functionality of the plans is validated through tests and exercises (plan reviews, table top/simulation/full exercises, emergency/crisis management exercises, unit tests, end-to-end tests), as this is an essential part of the recovery response. The exercises and tests are carried out under realistic conditions.



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4.17.7 Key Consideration 7

An FMI should identify, monitor, and manage the risks that key participants, other FMIs, and service and utility providers might pose to its operations. In addition, an FMI should identify, monitor, and manage the risks its operations might pose to other FMIs.

Potential risks caused by key participants are mainly due to operational problems of the key participants themselves and have no significant impact on SIX SIS but may pose significant risks to their counterparts and may pose risks to the efficiency of the settlement system, e.g. the settlement ratio. Risks caused by key participants are mitigated through the following:

- Clear criteria for admission and maintaining participation with SIX SIS
- Technical and operational requirements that must be met
- Continuous monitoring of system usage and the settlement ratio
- Detailed Market Guides documenting the established rules for participants
- Strong failed settlement regime to encourage participants to ensure a high settlement ratio
- Offering the option between a proprietary messaging system or SWIFT
- Clear release notes for system changes with client impact and the possibility of front-to-back testing in the integration system.

Potential risks caused by other FMIs or sub-custodians and correspondent banks are explained under Principle 20.

Wherever possible, SIX SIS uses the services of other affiliated companies of SIX. The risk management 2nd line of defense is performed by SIX Group Services in the CRO department whereas the operational management of collateral in SECOM is retained in SIX SIS. The operation and maintenance of the data center has been outsourced to SIX Group Services. The respective arrangement is governed by SLAs in compliance with FINMA regulations. Staff members of SIX Group Services are obligated to maintain banking secrecy.

The risk inherent in relying on information technology (IT) is addressed by SIX SIS's BCM, a segregation of duties represented in access rights and in control mechanisms within the systems, IT general controls and through a system design that ensures a high degree of security and operational reliability and an adequate, scalable capacity.

SIX SIS provides infrastructure services to national and international participants in the Swiss financial center and abroad. The impact that a potential risk may pose to its participants or to other FMIs is part of the risk assessment in the process of risk management.

SIX SIS is represented in the national interbank alarm and crisis organization and in national working groups regarding BCM. It participates actively in exercises of the



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An FMI should identify, monitor, and manage the risks that key participants, other FMIs, and service and utility providers might pose to its operations. In addition, an FMI should identify, monitor, and manage the risks its operations might pose to other FMIs.

alarm and crisis organizations. The BCM at SIX is coordinated closely across all legal entities with a specific focus on the FMIs.

4.18 Principle 18: Access and participation requirements

An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.

4.18.1 Key Consideration 1

An FMI should allow for fair and open access to its services, including by direct and, where relevant, indirect participants and other FMIs, based on reasonable risk-related participation requirements.

SIX SIS grants non-discriminatory and open access to its services and is obliged to do so by art. 18 FMIA. The participation requirements are governed by sec. 1 GTC SIX SIS. There are various categories of participants for which the participation requirements may vary to a certain extent due to the different legal backgrounds of the participants and the requested services. Within a category, all participants are treated in the same equal way subject to reasonable justifiable differentiation.

Participants of SIX SIS may be natural persons or legal entities commercially active in securities trading or settlement for third parties as listed in sec. 1.1 GTC SIX SIS:

- a) Banks in accordance with the Swiss Banking Law, as amended;
- b) Foreign banks that are subject to an adequate degree of regulation and supervision as well as adequate money laundering regulations and supervision at the time of their admission as participants and during their period of participation;
- c) Securities traders as defined by the provisions of the Swiss Law on Stock Exchanges and Securities Trading of 24 March 1995 (Stock Exchange Law, as amended);
- d) Foreign securities traders that are subject to an adequate degree of regulation and supervision as well as adequate money laundering regulations and supervision at the time of their admission as participants and during their period of participation;
- e) Clearing houses recognized as such in accordance with the law of their countries of domicile as well as central securities depositories (CSD) which are subject to an adequate degree of regulation and supervision as well as adequate money laundering regulations and supervision at the time of their admission and for the entire duration of their participation;



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An FMI should allow for fair and open access to its services, including by direct and, where relevant, indirect participants and other FMIs, based on reasonable risk-related participation requirements.

For Collateral Management and Securities Financing Services and related services, SIX SIS can also admit as participants natural persons or legal entities as listed in sec. 1.2 GTC SIX SIS:

- a) Institutions pursuant to the Swiss Law on Occupational Retirement, Survivors' and Disability Pension Plans (LOB).
- b) Collective investment schemes as defined in the Swiss Law on Collective Investment Schemes (CISA) and foreign collective investment schemes (e.g. pursuant to UCITS or AIFMD).
- c) Insurance companies.
- d) Foreign state funds and other institutions governed by public law.
- e) Custodians of collective investment schemes (limited to SIX SIS's services in connection with transactions on off-exchange markets operated by SIX Repo AG or Eurex Zurich Ltd).

In line with art. 21 (1b) FMIA the participation conditions are regularly published on the website of SIX SIS.

Further requirements for participation comprise:

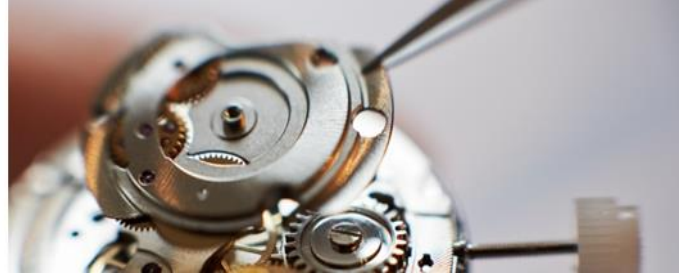
- a) Signing of the SIX SIS services contract.
- b) Membership of SIC, maintenance of a CHF account with SIX SIS and/or a correspondent institution that is a SIC member to enable settlement of the money side of securities transactions in case of CHF money settlement.
- c) Confirmation that technical and operational requirements are being met at the time of admission as well as, without interruption, during the period of participation.

4.18.2 Key Consideration 2

An FMI's participation requirements should be justified in terms of the safety and efficiency of the FMI and the markets it serves, be tailored to and commensurate with the FMI's specific risks, and be publicly disclosed. Subject to maintaining acceptable risk control standards, an FMI should endeavor to set requirements that have the least-restrictive impact on access that circumstances permit.

The requirements for participation mentioned under Key Consideration 18.1 are justified in terms of safety and aim to limit specific risks, including financial, operational, and legal risks. They have to be fulfilled by all participants.

The request for admission as participant must be submitted in written form. In addition, each member must comply with various quantitative and qualitative requirements related to hardware, software and the overall system. Necessary



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information to assess the member have to be provided regularly to fulfil the information duties outlined in the GTC SIX SIS.

Potential participants need to demonstrate their ability to comply with the SIX SIS requirements. Every applicant also has to comply with the technical and operational requirements as prescribed and set out in the Rules and Regulations (see also sec. 10 GTC SIX SIS). They must also prove that they have the necessary facilities, equipment, operational capability, personnel, hardware, software, communication systems, and IT links to SIX SIS, which enable them to perform their business as a participant.

Every participant demonstrates and warrants from the first day of the participation and on a continuous basis throughout the duration of its participation that it meets all of the participation criteria.

4.18.3 Key Consideration 3

An FMI should monitor compliance with its participation requirements on an ongoing basis and have clearly defined and publicly disclosed procedures for facilitating the suspension and orderly exit of a participant that breaches, or no longer meets, the participation requirements.

SIX SIS monitors compliance with the participation requirements on an ongoing basis (see art. 21a (2) in conjunction of 24 (4) NBO). The state of participants is reviewed regarding legal, financial and operational aspects. A main point of this review are the business activities and continuance of a participant and raising the question whether the participant can meet its obligations vis-à-vis SIX SIS in future. It is also a condition of participation that a participant continues to meet the requirements on an ongoing basis. If compliance is doubtful, SIX SIS takes the required and suitable measures to re-establish compliance with the requirements. Where appropriate, SIX SIS is entitled to suspend participation if there are indications that the participant no longer fulfils the requirement for participation. In some cases, even termination might be an adequate measure. The principles for participation and its suspension and termination are governed by sec. 1 and 2 GTC SIX SIS.

4.19 Principle 19: Tiered participation arrangements

An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.



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4.19.1 Key Consideration 1

An FMI should ensure that its rules, procedures, and agreements allow it to gather basic information about indirect participation in order to identify, monitor, and manage any material risks to the FMI arising from such tiered participation arrangements.

SIX SIS has a contractual relationship only with its participants. Business partners settling securities transactions through SECOM are known as "participants". Participants normally operate a securities and/or money account in SECOM, in which they keep securities and/or cash and settle securities transactions.

Indirect participants (Assigned Business Partners/ABPs) are banks who do not hold their own money and securities account with SIX SIS. An ABP uses the money or securities account of a participant (BP), which decides which services the ABP may use and enters into a contractual relationship with the ABP. There is no contractual relationship between an ABP and SIX SIS as long as the former keeps neither a safe custody nor a money account with SIX SIS.

SIX SIS does not gather information about ABPs. Risks (such as AML, credit, liquidity, market or operational risk) are monitored and assessed at the level of the participant.

4.19.2 Key Consideration 2

An FMI should identify material dependencies between direct and indirect participants that might affect the FMI.

SIX SIS has no formal procedure in place to evaluate any dependencies between participants and ABPs. SIX SIS only maintains a contractual relationship with the participant and risks are monitored and assessed at the level of the participant.

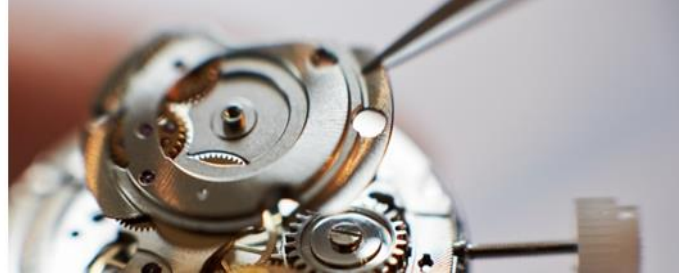
4.19.3 Key Consideration 3

An FMI should identify indirect participants responsible for a significant proportion of transactions processed by the FMI and indirect participants whose transaction volumes or values are large relative to the capacity of the direct participants through which they access the FMI in order to manage the risks arising from these transactions.

SIX SIS reviews the activity levels of its participants on a regular basis to identify whether there is a material concentration of activity but does not do so on the level of ABPs in relation to the direct participants' capacity. ABP activity is not under review at all because risks are monitored and assessed at the level of the participant.

4.19.4 Key Consideration 4

An FMI should regularly review risks arising from tiered participation arrangements and should take mitigating action when appropriate.



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SIX SIS mitigates risks arising from tiered participations through monitoring and assessing risks at the level of the participant.

4.20 Principle 20: FMI links

An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.

4.20.1 Key Consideration 1

Before entering into a link arrangement and on an ongoing basis once the link is established, an FMI should identify, monitor, and manage all potential sources of risk arising from the link arrangement. Link arrangements should be designed such that each FMI is able to observe the other principles in this report.

With respect to new links and FMI providers, SIX has set in place directives and procedures for the selection of FMI's as service providers and to fulfil its risk and quality standards. Therefore when establishing a new link to an FMI or a local custodian, stringent selection guidelines are applied to ensure that the counterparty risks stemming from SIX SIS's custodian network are well contained. In the Request for Proposal (RFP) process, a detailed risk assessment of the new relationship is performed based on a detailed due diligence questionnaire that considers the CPMI-IOSCO principles. It is coordinated by Network Management with input from Risk Management, Legal & Compliance, Client Support and Operations departments.

4.20.2 Key Consideration 2

A link should have a well-founded legal basis, in all relevant jurisdictions, that supports its design and provides adequate protection to the FMIs involved in the link.

SIX SIS offers direct technical links to various other international custodians, T2S and CSDs (e.g. ESES markets, Clearstream, Banking Frankfurt, OeKB, VP Securities Denmark, Keler, NBB Belgium etc.).

Thanks to these direct links, participants of SIX SIS benefit from efficient and cost-effective straight-through processing across national borders and systems.

The relevant CPMI-IOSCO principles are selection criteria as well as compliance with market standards – both technically and businesswise. The legal basis is questioned in the RFP process too. If and when necessary, SIX SIS seeks advice in the relevant local markets resp. asks for a legal opinion. The link agreements thus create a robust contractual basis.



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4.20.3 Key Consideration 3

Linked CSDs should measure, monitor, and manage the credit and liquidity risks arising from each other. Any credit extensions between CSDs should be covered fully with high-quality collateral and be subject to limits.

SIX SIS applies the same standards for managing credit and liquidity risks against other CSDs as it applies to its participants. Limits apply and credit is given only against collateral, which needs to fulfil the quality criteria defined in the lending norms.

For further information, refer to Principles 4 and 5.

4.20.4 Key Consideration 4

Provisional transfers of securities between linked CSDs should be prohibited or, at a minimum, the retransfer of provisionally transferred securities should be prohibited prior to the transfer becoming final.

In cases where securities transfers are provisional, the received securities are blocked by SIX SIS until a transfer is final.

4.20.5 Key Consideration 5

An investor CSD should only establish a link with an issuer CSD if the arrangement provides a high level of protection for the rights of the investor CSD's participants.

The selection of sub-custodians take place in line with internal guidelines (sec. 25 lit. b GTC SIX SIS).

The initial selection process for the opening of a market link is primarily based on the existence of adequate protection of participants' assets under the local market standards and legal framework.

SIX SIS entrusts the safe custody of certificated securities, global certificates, uncertificated securities or intermediated securities to suitable sub-custodians it chooses abroad. The participant's consent is not required. The participant's explicit consent is nonetheless required where the foreign sub-custodian is not subject to adequate regulatory supervision (sec. 25 lit. a GTC SIX SIS mirroring art. 9 FISA). If the custody of securities with a foreign sub-custodian is not governed by the FISA, the arrangement confers upon the participant rights that are at least equal to the rights acquired by SIX SIS with the sub-custodian (sec. 26 lit. b GTC SIX SIS mirroring art. 10 (2) FISA).

To protect the rights of its participants and ensure operational efficiency, SIX SIS reconciles its own transactions (daily) and balances (monthly) electronically against the statements of the CSD or local custodian. Any break is recorded, identified and allocated to the responsible unit. All breaks are monitored and reported to Operational Risk Management until resolved.



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4.20.6 **Key Consideration 6**

An investor CSD that uses an intermediary to operate a link with an issuer CSD should measure, monitor, and manage the additional risks (including custody, credit, legal, and operational risks) arising from the use of the intermediary.

Please see Key Consideration 20.1.

4.20.7 **Key Consideration 7**

Before entering into a link with another CCP, a CCP should identify and manage the potential spill-over effects from the default of the linked CCP. If a link has three or more CCPs, each CCP should identify, assess, and manage the risks of the collective link arrangement.

Key Consideration 20.7 is not applicable to SIX SIS because it is not a CCP.

4.20.8 **Key Consideration 8**

Each CCP in a CCP link arrangement should be able to cover, at least on a daily basis, its current and potential future exposures to the linked CCP and its participants, if any, fully with a high degree of confidence without reducing the CCP's ability to fulfil its obligations to its own participants at any time.

Key Consideration 20.8 is not applicable to SIX SIS because it is not a CCP.

4.20.9 **Key Consideration 9**

A TR should carefully assess the additional operational risks related to its links to ensure the scalability and reliability of IT and related resources.

Key Consideration 20.9 is not applicable to SIX SIS because it is not a TR.

4.21 **Principle 21: Efficiency and effectiveness**

An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.

4.21.1 **Key Consideration 1**

An FMI should be designed to meet the needs of its participants and the markets it serves, in particular, with regard to choice of a clearing and settlement arrangement; operating structure; scope of products cleared, settled, or recorded; and use of technology and procedures.

SIX and thus SIX SIS are owned by a majority of their users (see ownership structure on the SIX website) and all user groups are represented throughout the SIX governance bodies and user groups. This allows SIX SIS users to define and design the



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An FMI should be designed to meet the needs of its participants and the markets it serves, in particular, with regard to choice of a clearing and settlement arrangement; operating structure; scope of products cleared, settled, or recorded; and use of technology and procedures.

services SIX SIS offers according to their needs. It allows them to establish monitoring facilities and processes to guarantee the effectiveness and efficiency of these services.

SIX SIS interacts with its users through formal panels on three decision levels to ensure proper service provision and alignment: strategic, operational, and technical. All panels are jointly comprised of representatives from SIX SIS and its owner banks, providing design, communication, and feedback channels for users.

- Strategic: The Swiss Securities Post-Trade Council (SPTC) is an independent body in the securities industry that consists of representatives of the banks, the issuers/SwissHoldings and the infrastructure provider SIX Securities Services. The Swiss SPTC and its members are involved in post-trade securities issues in the Swiss market and are a competent point of contact. SIX is part of this committee, which discusses market developments & requirements and initiates implementations.
- Operational: User Groups (comprised of operational representatives from both sides) serve as the means for technical reconciliation, project coordination, service quality assurance, and the resolution of technical questions.
- Technical: Technical working groups (comprised of subject matter experts) for the definition and elaboration of details and definitions.

These panels guarantee the effectiveness and efficiency of SIX SIS' functions and that their design meets user requirements and needs. SIX SIS relationship or account managers meet with participants on a regular basis in order to get feedback on service aspects and additional needs.

The Management Committee of SIX SIS bears overall responsibility for meeting user requirements.

4.21.2 Key Consideration 2

An FMI should have clearly defined goals and objectives that are measurable and achievable, such as in the areas of minimum service levels, risk-management expectations, and business priorities.

SIX SIS's goals and objectives are part of the overall business strategy of SIX, and are reflected in a clearly defined strategy for SIX SIS set up by its BoD. SIX SIS monitors its performance delivery through an extensive system of Key Performance Indicators (KPIs) against its goals and objectives.

SIX SIS's core settlement and clearing system SECOM has a target availability of 99.8%, which has been exceeded consistently throughout the past years. SIX SIS's SWIFT



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An FMI should have clearly defined goals and objectives that are measurable and achievable, such as in the areas of minimum service levels, risk-management expectations, and business priorities.

interface availability target is 99% and its actual availability has consistently been exceeded throughout the past years.

The core and peripheral systems' reliability is monitored by the Service Management of SIX SIS on a regular basis. In addition, IT and physical security are ensured with a cyber-security monitoring team working around the clock.

SIX SIS processes are reviewed periodically both internally and externally (e.g., by the SNB).

4.21.3 Key Consideration 3

An FMI should have established mechanisms for the regular review of its efficiency and effectiveness.

See Key Consideration 21.1 and Key Consideration 21.2.

SIX SIS has implemented the directive for ICS to ensure effective controls and efficient processes, which are reviewed periodically by internal and external audit.

The ICS is based on a systematic risk analysis. It documents all business-related processes, risks, systems and controls, and thus ensures the adequacy and effectiveness of controls. The ICS promotes and facilitates the analysis of dependencies between processes, risks and controls. It supports the reliability of financial reporting and protection of SIX SIS' assets. It also aims to mitigate all identified risks according to the defined risk appetite and the defined risk tolerance. The ICS is an integral part of daily business and ensures compliance with all relevant internal and external regulations. Internal audit reviews the effectiveness of measures taken in the business areas and assesses the effective operation of the ICS.

The ICS also includes the internally outsourced functions/processes and continuously monitors the observance of the specifications and directives imposed on the internal service providers.

Additionally, the efficiency and effectiveness of the services are measured at different levels. SIX SIS uses a balanced scorecard approach to measure quantitative and qualitative topics such as financial performance, customer satisfaction, project performance, strategy, and risk exposure. The senior management's remuneration is linked to the balanced scorecard.

SIX SIS has implemented performance management processes which align overarching company goals and operative KPIs on all levels with individual and function-specific performance goals.



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4.22 Principle 22: Communication procedures and standards

An FMI should use, or at a minimum accommodate, relevant internationally accepted communication procedures and standards in order to facilitate efficient payment, clearing, settlement, and recording.

4.22.1 Key Consideration 1

An FMI should use, or at a minimum accommodate, internationally accepted communication procedures and standards.

For the implementation of its FMI services, SIX SIS uses as guidelines the globally accepted and proven market practices of the Securities Market Practice Group (SMPG).

Whenever possible and in line with the SMPG guidelines, SIX SIS employs the international standards that constitute the foundation of the business processes of its FMI services, in particular, the financial services reference data standards owned by ISO/TC 68/SC 8 (e.g. ISIN, CFI, MIC, LEI, BIC, UTI, etc.) as well as the information exchange standards owned by ISO/TC 68/SC 9 (e.g. ISO 15022, ISO 20022).

For the communications with its business partners, both clients and services providers, SIX SIS offers two alternative options, the SWIFT-Network and the Secure Swiss Finance Network (SSFN), the latter via a computer-to-computer-interface including a web-based GUI frontend. Market and client demand drive the implementation of ISO 20022 standards. Proprietary messages are constrained to specific niche purposes such as share register-registration.

4.23 Principle 23: Disclosure of rules, key procedures, and market data

An FMI should have clear and comprehensive rules and procedures and should provide sufficient information to enable participants to have an accurate understanding of the risks, fees, and other material costs they incur by participating in the FMI. All relevant rules and key procedures should be publicly disclosed.

4.23.1 Key Consideration 1

An FMI should adopt clear and comprehensive rules and procedures that are fully disclosed to participants. Relevant rules and key procedures should also be publicly disclosed.

SIX SIS publicly discloses key aspects of all information relating to its services as CSD on a regular basis and in accordance with art. 21 FMIA and art. 19 FMIO and standards set by other relevant international bodies (see art. 19 lit. i FMIO).

Such disclosure includes information regarding its design and operation as a CSD (see art. 21 FMIA). SIX SIS and its parent company SIX each publish an annual report. These reports mirror the essential activities of SIX SIS and the relevant Group companies.

Information regarding the offered and ancillary services is available on the website of



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An FMI should adopt clear and comprehensive rules and procedures that are fully disclosed to participants. Relevant rules and key procedures should also be publicly disclosed.

SIX, for instance under the categories "Settlement and Custody" and "Securities Finance".

Information regarding the organizational structure of SIX SIS (see art. 21 (1) lit. a FMIA) can be found in its annual reports. These reports particularly include information concerning the financial situation of the company as well as the principles of its risk management.

The rights and obligations of the participants (see art. 21 (1) lit c FMIA) are generally governed in the GTC SIX SIS, being part of the service contract every participant has to subscribe. Sec. 10 GTC SIX SIS refers to further documents with binding characters, the so called "Rules & Regulations". These include the Market Guides containing general and market-specific operational duties. For specific services, tailor-made contracts exist.

Upon request, interested parties and potential new participants receive the service contract, the GTC SIX SIS and further documents.

Based on feedback from regulators, its own participants and other business partners, SIX SIS considers its rules and procedures as clear and comprehensive.

The process for changing the GTC SIX SIS or its "Rules & Regulations" is included in sec. 50 and sec. 10.2 lit. d GTC SIX SIS, respectively. Participants are notified of changes.

Please also refer to Principle 1.

4.23.2 Key Consideration 2

An FMI should disclose clear descriptions of the system's design and operations, as well as the FMI's and participants' rights and obligations, so that participants can assess the risks they would incur by participating in the FMI.

Please refer to Key Consideration 23.1 and Principle 1.

4.23.3 Key Consideration 3

An FMI should provide all necessary and appropriate documentation and training to facilitate participants' understanding of the FMI's rules and procedures and the risks they face from participating in the FMI.

(New) participants receive introductions and training. A test system is provided so that operational procedures may be tested before going live. Participants can contact the relationship management of SIX SIS with any query they might have.

Further teams in the organization provide second- and third-level support for participants.



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An FMI should provide all necessary and appropriate documentation and training to facilitate participants' understanding of the FMI's rules and procedures and the risks they face from participating in the FMI.

Due to the constant contact with the participants, the involvement of participants in various bodies and as owners of SIX (see Key Consideration 2.1), it is ensured that the participants have a good understanding of their participation at SIX SIS. Their feedback is appreciated and integrated in the development of new products and services.

Should SIX SIS notice problems in operational processes of its participants, SIX SIS will provide training to such a participant in a way that is most appropriate.

4.23.4 Key Consideration 4

An FMI should publicly disclose its fees at the level of individual services it offers as well as its policies on any available discounts. The FMI should provide clear descriptions of priced services for comparability purposes.

SIX SIS discloses its prices and fees for its services, including its conditions for discounts, on its website (see art. 21 lit. b FMIO).

4.23.5 Key Consideration 5

An FMI should complete regularly and disclose publicly responses to the CPMI-IOSCO disclosure framework for financial market infrastructures. An FMI also should, at a minimum, disclose basic data on transaction volumes and values.

As mentioned above (Key Consideration 23.1), SIX SIS publicly discloses key aspects of all information relating to its services as CSD on a regular basis and in accordance with FMIA and FMIO and the standards set by the relevant international bodies (see art. 21 FMIA and art. 19 FMIO).

Quantitative information (e.g., the aggregate transaction volumes and deposit volumes) is published in the annual reports of SIX SIS and SIX (see art. 19 lit. g and h FMIO).

SIX SIS publishes its updated CPMI-IOSCO disclosure every second year or earlier if material parts of the disclosure change.

Please refer to Key Consideration 23.1 for further information that is disclosed.

4.24 Principle 24: Disclosure of market data by trade repositories

A TR should provide timely and accurate data to relevant authorities and the public in line with their respective needs.

Principle 24 is not applicable to SIX SIS because it is not a TR.



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5. References

GTC SIX SIS

<https://www.six-group.com/dam/download/securities-services/custody-and-settlement/info-center/clients/gtc/mg-general-agb-220201.pdf>

Pricing of SIX SIS

<https://www.six-group.com/en/products-services/the-swiss-stock-exchange/post-trade/settlement-and-custody/info-center.html#scrollTo=pricing>

SIX Governance

<https://www.six-group.com/en/company/governance.html>

SIX ownership structure

<https://www.six-group.com/en/company/governance.html#scrollTo=ownership>

SIX Securities Services website

<https://www.six-group.com/en/products-services/the-swiss-stock-exchange/post-trade.html>

SIX SIS Annual Reports

<https://www.six-group.com/en/products-services/securities-services/download-center.html>

SIX SIS website

<https://www.six-group.com/en/products-services/the-swiss-stock-exchange/post-trade/settlement-and-custody.html>

SIX website

<http://www.six-group.com/en/home.html>

SNB web page on FMI oversight

<https://www.snb.ch/en/the-snb/mandates-goals/financial-stability/financial-market-infrastructure>

Please note that references to external sources, e.g. to websites or links of third parties, are provided solely for information purposes and do not imply any recommendations whatsoever. SIX SIS AG has neither provided nor processed the contents of the sources in question. Furthermore, SIX SIS AG has not verified, reviewed or updated the contents of these sources and therefore disclaims all liability for the information contained therein.



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6. Glossary

ABP	Assigned Business Partner
AML	Anti Money Laundering
BAU	Business As Usual
BC	Business Continuity
BCM	Business Continuity Management
BIA	Business Impact Analysis
BoD	Board of Directors
CCP	Central Counter Party
CDS	Credit Default Swap
CEO	Chief Executive Officer
CFO	Chief Financial Officer
CISA	Collective Investment Schemes
CIT	Corporate Information Technology
CPMI	Committee on Payment and Market Infrastructure
CRO	Chief Risk Officer
CSD	Central Securities Depository
DCA	Dedicated Cash Account
DVP	Delivery Versus Payment
EU	European Union
EWMA	Exponentially Weighted Moving Average
FINMA	Swiss Financial Market Supervisory Authority
FISA	Swiss Federal Intermediated Securities Act
FMI	Financial Market Infrastructure
FMIA	Financial Market Infrastructure Act
FMIO	Financial Market Infrastructure Ordinance
FX	Foreign Exchange
GBR	General Business Risk
GC	General Collateral
GPG	BCI Good Practice Guidelines
GTC SIX SIS	General Terms and Conditions of SIX SIS
GUI	Graphical User Interface
ICS	Internal Control System
IOSCO	International Organization of Securities Commissions
ISF	Standard of Good Practice for Information Security
ISIN	International Securities Identification Number
ITSCM	IT Service Continuity Management
KPI	Key Performance Indicator
LOB	Swiss Law on Occupational Retirement, Survivors' and Disability Pension Plans
NBA	National Bank Act
NBO	National Bank Ordinance
Repo	Repurchase Agreement



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RFP	Request for Proposal
RMS	Risk Management System
RTGS	Real-Time Gross Settlement System
RVP	Receive Versus Payment
SCFS	Swiss Commission for Financial Standardization
SECOM	Settlement Communication System
SIC	SIX Interbank Clearing AG
SIX	SIX Group AG
SIX Group Services	SIX Group Services AG
SIX Securities Services	SIX Securities Services AG
SIX SIS	SIX SIS AG
SIX x-clear	SIX x-clear AG
SLA	Service Level Agreement
SLB	Securities Lending and Borrowing
SMPG	Securities Market Practice Group
SNB	Swiss National Bank
SPTC	Securities Post-Trade Council
T2S	TARGET2-Securities
TCM	Triparty Collateral Management
VaR	Value at Risk

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