Turkey

This document provides citations of the relevant legislation, regulation, policy and guidance, and notes explaining the assigned ratings for all relevant Principles of a given jurisdiction, by FMI type. It is a direct download of all the information for one jurisdiction that is included in the online CPMI-IOSCO PFMI implementation database (www.bis.org/committees/cpmi/pfmi/l2-database and www.iosco.org/about/?subsection=cpmi_iosco).

It includes all Principles and all key considerations: for the ones where gaps were identified the last column provides details on key conclusions and recommendations. The online CPMI-IOSCO PFMI implementation database allows to search information by Principle across different jurisdictions.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	1.0	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.		• CMB Decision No. 10/328 (23 March 2016) (also referred to as “CMB Policy Statement No.10/328”) • Capital Markets Law No. 6362 • (New) General Regulation on the Establishment and Operating Principles of Central Clearing Institutions (CMB General By-law on CCI) • CMB By-law on Central Counterparty Regulation of Istanbul Clearing, Settlement and Custody Bank Inc. (CMB By-law on Takasbank CCP services) • CBM By-law on Istanbul Clearing, Settlement and Custody Bank Inc. Central Clearing and Settlement Regulation (CMB By-law on Takasbank Clearing Services) • Market Directives (Takasbank) (as approved by CMB) • Turkish Civil Code No. 4721 • Turkish Code of Obligations No. 6098 • Turkish Commercial Code No.6102 • Execution and Bankruptcy Law No. 2004 • Takasbank Articles of Association. (Approved by CMB) • Banking Law No. 5411 • Law on Payment and Securities Settlement Systems, Payment Services and Electronic Money Institutions No. 6493 • CMB Communiqué on Information Systems Management (VII-128.9) • CMB Communiqué on Independent Audit of Information Systems (III-62.2)	Consistent	The gaps or shortcomings identified have no material impact on completeness or consistency.
CCP	1.1	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	The legal basis should provide a high degree of certainty for each material aspect of an FMI’s activities in all relevant jurisdictions.	CMB Policy Statement No.10/328 • Capital Markets Law No. 6362-Article 77- 78- 79, 103/1. • CMB General By-law on the Establishment and Operating Principles of Central Clearing Institutions (CMB General By-law on CCI) (Whole Regulation)- • CMB By-law on Istanbul Clearing, Settlement and Custody Bank Inc. Central Clearing and Settlement Regulation (CMB By-law on Takasbank Clearing Services) (Whole Regulation) • CMB By-law on Central Counterparty Regulation of Istanbul Clearing, Settlement and Custody Bank Inc. (CMB By-law on Takasbank CCP services) (Whole Regulation)	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	1.2	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	An FMI should have rules, procedures, and contracts that are clear, understandable, and consistent with relevant laws and regulations.	CML No. 6362. Art 17 Par 1 and 2, Article 36 Par 2, Article 73 Paragraph (Par) 2, Article 77, Article 78, Article 79 Par 1. - CMB Policy Statement No.10/328. - Takasbank Articles of Association. (Approved by CMB) - Banking Law No. 5411. - Law on Payment and Securities Settlement Systems, Payment Services and Electronic Money Institutions No. 6493. - CMB General By-Law on CCI. - CMB By-Law on Takasbank CCP Services. Article 5/10 - CMB By-Law on Takasbank Clearing Services.	Broadly consistent	The CMB may consider making explicit in the law that rules should be clear and understandable.
CCP	1.3	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	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.	CML No. 6362. - CMB Policy Statement No.10/328 - Takasbank Articles of Association. - Banking Law No. 5411. - Law on Payment and Securities Settlement Systems, Payment Services and Electronic Money Institutions No. 6493. - CMB General By-Law on CCI. - CMB By-Law on Takasbank CCP Services. - CMB By-Law on Takasbank Clearing Services.	Broadly consistent	The CMB may consider making explicit and publicly disclosing the interplay between the different pieces of regulation. The interplay between the different pieces of regulation (CML, Bylaws and other documents) as well as their approval procedures could be publicly disclosed for all stakeholders to understand them clearly.
CCP	1.4	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	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.	• Capital Markets Law No. 6362-Article 79/1 CMB Policy Statement No.10/328 • CMB General By-Law on CCI, Article 21/1-2 • CMB By-Law on Takasbank CCP Services, Articles 7-16	Consistent	
CCP	1.5	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	An FMI conducting business in multiple jurisdictions should identify and mitigate the risks arising from any potential conflict of laws across jurisdictions.	Not Applicable	Not applicable	Takasbank is not providing services in multiple jurisdictions, only in Turkey.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	2.0	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.		• CMB Policy Statement 10/328 • Capital Markets Law No. 6362 • (New) CMB General Regulation on the Establishment and Operating Principles of Central Clearing Institutions • CMB By-law on Takasbank CCP Services, • Turkish Commercial Code No.6102 • Takasbank Articles of Association • Banking Law. No. 5411- Part III: Corporate Governance, Section I: Management • Law on Payment and Securities Settlement Systems, Payment Services and Electronic Money Institutions No. 6493 • (Banking Regulation and Supervision Agency - BRSA/BDDK) Regulation on Corporate Governance Principles of Banks	Consistent	The gaps or shortcomings identified have no material impact on completeness or consistency.
CCP	2.1	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.	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.	• Capital Markets Law No. 6362, Articles 77, 78, 79, 128 • CMB By-law on Takasbank CCP Services Art 5 Par 10 • CMB Policy Statement No.10/328 • (new) CMB General By-law on CCI, Articles 10/1a-1d-1h	Consistent	
CCP	2.2	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.	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.	• Turkish Commercial Code No.6102 • Capital Markets Law No. 6362, Article 17, 36/2 • CMB Policy Statement No.10/328 • Banking Law. No. 5411- Part III: Corporate Governance, Section I: Management • Law on Payment and Securities Settlement Systems, Payment Services and Electronic Money Institutions No.6493, Article 14/6 • (Banking Regulation and Supervision Agency – BRSA/BDDK) Regulation on Corporate Governance Principles of Banks (Official Gazette dated 1 November, 2006))	Consistent	
CCP	2.3	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.	The roles and responsibilities of an FMI's board of directors (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.	• Turkish Commercial Code No.6102, Articles 374, 375, 393, 395, 396 • (new) CMB General By-law on CCI, Article 13 • Takasbank Articles of Association (approved by CMB), Article 9, Article 12 • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	2.4	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.	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).	• Banking Law. No. 5411, Articles 23, 25 • (new) CMB General By-Law on CCI, Article 12 • CMB Policy Statement No.10/328	Consistent	
CCP	2.5	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.	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.	• (new) CMB General By-Law on CCI, Articles 15, 16 • CMB Policy Statement No.10/328	Consistent	
CCP	2.6	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.	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.	• Capital Markets Law No. 6362, Article 78/5 • Articles 16, 16/A, 16/C and 33 of the (new) CMB General By-Law on CCI. • CMB By-law on Takasbank CCP Services, Articles 40-48 • CMB Policy Statement No.10/328	Partly consistent	The CMB may consider establishing a unified high-level risk management framework, that would map all the risks that the CCP is exposed to and applicable policies and procedures (together with those described in the KC). CMB General Bylaw on CCI, Articles 16A and 16C on risk committee and audit committee arrangements fulfil the second part of the KC on authority, independence, resources and access to the board. Regarding the first part of the KC, there is no reference to the establishment of a risk management "framework" in a unified document. Article 16C indicates that "the CCI must have written policies, procedures, and systems in place which will allow for identification, management, quantification, monitoring, and control of all risks that the CCI is exposed to."
CCP	2.7	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.	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.	• Capital Markets Law No. 6362, Article 77/2-4, Article 78/4-5-6-7 • (new) CMB General By-Law on CCI, Article 10/1a-b-ç-e-f-g-ğ-h-ı, 10/2 and 10/3. and Article 33/1 • CMB Policy Statement No.10/328	Consistent	
CCP	3.0	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.		• CMB Policy Statement 10/328 • Capital Markets Law No. 6362 • (new) CMB General By-Law on CCIs • CMB By-law on Takasbank CCP Services • CMB By-Law on Takasbank Clearing Services • Law on Payment and Securities Settlement Systems, Payment Services and Electronic Money Institutions No. 6493	Broadly consistent	The CMB may consider the measure that is mentioned under KC 4.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	3.1	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	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.	• Capital Markets Law No. 6362, Article 78/4-5-6-7 • (new) CMB General By-Law on CCIs, Article 9 Par 2 , Article 16/B(1)-(3) and (6), Article 16/C. • CMB By-law on Takasbank CCP Services, Articles 40-47 • CMB Policy Statement No.10/328	Consistent	
CCP	3.2	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	An FMI should provide incentives to participants and, where relevant, their customers to manage and contain the risks they pose to the FMI.	• Article 14, 15, 43 and 44 of CMB By-Law on Takasbank CCP Services • Articles 31, 55-60 of the CMB By-Law on Takasbank Clearing Services • CMB Policy Statement No.10/328	Consistent	
CCP	3.3	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	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.	• Capital Markets Law No. 6362, Article 78/5-6 • Paragraph 6 of Article 16/B of (new) CMB General By-law on CCI. • CMB Policy Statement No.10/328	Consistent	
CCP	3.4	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	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.	• Par 1/e of Article 35/B, Article 40/A of the (new) CMB General By-Law on CCI. • Par 2/ç of Article 5 of the Law on Payment and Securities Settlement Systems, Payment Services and Electronic Money Institutions No. 6493. • CMB Policy Statement No.10/328	Partly consistent	The CMB may consider the following: legally require CCPs to set up a specific recovery and orderly wind-down plan according to the PFMI and recovery plan (see also KC 15.3).

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	4.0	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 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.		• Capital Markets Law No. 6362, Article 78/4-5 • By-law on Takasbank CCP Services, Article 5/10, Articles 40-48, • CMB Policy Statement No.10/328) • (new) CMB General By-law on CCI.	Broadly consistent	The CMB may consider strengthening the applicable legal framework with a view to making it explicit how the PFMI are implemented for Principle 4.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	4.1	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 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.	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.	• Par 6 of Article 16/B, Par 1 of Article 33 of the (new) CMB General By-Law on CCI. • Article 5/10 of the CMB By-Law on Takasbank CCP Services • CMB Board Decision (Policy Statement) No: 10/328. • CMB Board Decision 16/557 • CMB Board Decision 31/1221	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	4.2	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 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.	An FMI should identify sources of credit risk, routinely measure and monitor credit exposures, and use appropriate risk-management tools to control these risks.	• Par 6 of Article 16/B of the (new) CMB General By-Law on CCI. • Article 5/10 of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	4.4	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 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.	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.	• Article 33/6-7 of the (new) CMB General By-law on CCI. • Article 5/10 of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Broadly consistent	The CMB may consider clarifying, in the applicable legal provisions, what a stress testing framework should be, incorporating the need for various historic and hypothetical scenarios. There is an obligation to perform stress testing, but no details are given, even in the board decisions.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	4.5	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 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.	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 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.	• CMB By-law on Takasbank CCP Services, Article 5/10, Article 40 • Par 6 and 7 of Article 33 of the (new) CMB General By-Law on CCI. • Board Decision 31/1221 • CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB implements the second part of the KC.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	4.6	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 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.	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.	• CMB By-law on Takasbank CCP Services, Article 40 • Margins Par 2 of Article 33 of the (new) CMB General-By-Law on CCI. • Percentage. Par 3 of Article 33 of the (new) CMB General By-Law on CCI. • Time horizon for the calculation for historical volatility. Par 3 of Article 33 of the (new) CMB General By-Law on CCI. • Time horizons for the liquidation period on CCI. Par 3 of Article 33 of the (new) CMB General By-Law on CCI. • Portfolio margining. -Par 5 and 6 of Article 20 of the CMB By-Law on Takasbank CCP Services. • Procyclicality. The last sentence of Par 4 of Article 33 of the (new) CMB General By-Law on CCI. • Board Decision 31/1221 • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	4.7	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 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.	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.	• Article 31/B of the (new) CMB General By-Law on CCI. • Article 5/10 and Article 36 of the CMB By-Law on Takasbank CCP Services. • CMB Policy Statement No.10/328	Broadly consistent	The CMB may consider making explicit the framework for the replenishment of resources. The General Regulation on the Establishment and Operating Principles of Central Clearing Institutions (New - CMB General Bylaw on CCI) provides for an allocation of losses. On replenishment, the reference to additional contributions is very high level (Art 31/B(1)e).
CCP	5.0	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.		CMB Policy Statement 10/328 (new) CMB General By-Law on CCI CMB By-Law on Takasbank CCP Services Market Directives (as officially approved by the Board)	Broadly consistent	The CMB may consider the measures mentioned under KC 1 and KC 6.
CCP	5.1	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.	An FMI should generally limit the assets it (routinely) accepts as collateral to those with low credit, liquidity, and market risks.	• Article 25/A and 34/A(1) of the (new) CMB General By-Law on CCI. • Article 19/(1), (2) and (3) of CMB By-Law on Takasbank CCP Services. • CMB Policy Statement No.10/328	Broadly consistent	The CMB may propose in the regulations a definition of "low credit, liquidity and market risk collateral" and revise the list accordingly. The assets accepted as collateral are limited. It seems from the examples provided by the CMB that in practice, collateral accepted in the CCP is stricter than foreseen in the law and subject to strong haircuts when considered not secure enough. Furthermore, there is no definition for the terms "low credit, liquidity or market risk" and no standardised process of evaluation.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	5.2	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.	An FMI should establish prudent valuation practices and develop haircuts that are regularly tested and take into account stressed market conditions.	• Article 33/(7) and (8) of the (new) CMB General By-Law on CCI. • Article 44 of the CMB By-Law on Takasbank CCP Services. • Market Directives (as officially approved by the Board) • CMB Policy Statement No.10/328	Consistent	
CCP	5.3	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.	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 last sentence of Paragraph 4 of Article 33 of the (new) CMB General By-Law on CCI • Article 44 of the CMB By-Law on Takasbank CCP Services. • CMB Policy Statement No.10/328	Consistent	
CCP	5.4	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.	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.	• Article 34/A of the (new) CMB General By-Law on CCI. • CMB By-law on Takasbank CCP services, Article 43 • CMB Policy Statement No.10/328	Consistent	
CCP	5.5	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.	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.	Not Applicable	Not applicable	Takas Istanbul does not accept any security as collateral which is classified as cross-border collateral.
CCP	5.6	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.	An FMI should use a collateral management system that is well-designed and operationally flexible.	(new) CMB General By-law on CCI, Article 25/A • Article 5/10 of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Broadly consistent	The CMB may consider a more precise definition of the requirements applying to the collateral management systems, in the regulations applying to CCPs.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	6.0	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.		• CMB By-law on Takasbank CCP Services, Article 5/10, Article 43/1 CMB Policy Statement 10/328 (new) CMB General By-Law on CCI, (Takasbank) OTC Market Directive Takasbank Debt Securities Market Directive Takasbank Securities Lending Market Directive Takasbank Directive on Borsa İstanbul Money Market Takasbank Directive on Borsa Istanbul Equity Market Takasbank Directive on Borsa Istanbul Futures and Options Market Takasbank Directive on Borsa Istanbul Swap Market	Consistent	
CCP	6.1	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.	A CCP should have a margin system that establishes margin levels commensurate with the risks and particular attributes of each product, portfolio, and market it serves.	• Article 33 of the (new) CMB General By-Law on CCI. • CMB By-law on Takasbank CCP Services, Article 18, 20 and 21. • CMB Policy Statement No.10/328	Consistent	
CCP	6.2	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.	A CCP should have a reliable source of timely price data for its margin system. A CCP should also have procedures and sound valuation models for addressing circumstances in which pricing data are not readily available or reliable.	• Article 33, 40/2, 40/3 of the (new) CMB General By-Law on CCI. • Article 18/4 of CMB By-Law on Takasbank CCP Services (Takasbank) OTC Market Directive, Article 27/4, Article 28/4, Article 37/4. • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	6.3	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.	A CCP should adopt initial margin models and parameters that are risk-based and generate margin requirements sufficient to cover its potential future exposure to participants in the interval between the last margin collection and the close out of positions following a participant default. Initial margin should meet an established single-tailed confidence level of at least 99 percent with respect to the estimated distribution of future exposure. For a CCP that calculates margin at the portfolio level, this requirement applies to each portfolio's distribution of future exposure. For a CCP that calculates margin at more-granular levels, such as at the subportfolio level or by product, the requirement must be met for the corresponding distributions of future exposure. The model should (a) use a conservative estimate of the time horizons for the effective hedging or close out of the particular types of products cleared by the CCP (including in stressed market conditions), (b) have an appropriate method for measuring credit exposure that accounts for relevant product risk factors and portfolio effects across products, and (c) to the extent practicable and prudent, limit the need for destabilising, procyclical changes.	• Article 33 of the (new) CMB General By-Law on CCI. • CMB By-law on Takasbank CCP Services - Article 5/10, Articles 18, 20 and 21. • CMB Policy Statement No.10/328	Consistent	
CCP	6.4	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.	A CCP should mark participant positions to market and collect variation margin at least daily to limit the build-up of current exposures. A CCP should have the authority and operational capacity to make intraday margin calls and payments, both scheduled and unscheduled, to participants.	• Article 33/2 of the (new) CMB General By-Law on CCI. • Article 18/3-4, Article 21 of the CMB By-Law on Takasbank CCP services. • Takasbank Debt Securities Market Directive - Article 31 • Takasbank Securities Lending Market Directive - Article 22 • Takasbank Directive on Borsa İstanbul Money Market - Article 20 • Takasbank Directive on Borsa Istanbul Equity Market- Article 32/4 • Takasbank Directive on Borsa Istanbul Futures And Options Market - Article 23/2 • Takasbank Directive on Borsa Istanbul Swap Market - Article 22 • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	6.5	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.	In calculating margin requirements, a CCP may allow offsets or reductions in required margin across products that it clears or between products that it and another CCP clear, if the risk of one product is significantly and reliably correlated with the risk of the other product. Where two or more CCPs are authorised to offer cross-margining, they must have appropriate safeguards and harmonised overall risk-management systems.	• Article 5/10 and Par 5 and 6 of Article 20 of the CMB By-Law on Takasbank CCP Services. • CMB Policy Statement No.10/328	Consistent	
CCP	6.6	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.	A CCP should analyse and monitor its model performance and overall margin coverage by conducting rigorous daily backtesting and at least monthly, and more-frequent where appropriate, sensitivity analysis. A CCP should regularly conduct an assessment of the theoretical and empirical properties of its margin model for all products it clears. In conducting sensitivity analysis of the model's coverage, a CCP should take into account a wide range of parameters and assumptions that reflect possible market conditions, including the most-volatile periods that have been experienced by the markets it serves and extreme changes in the correlations between prices.	• Article 33 of the (new) CMB General By-Law on CCI. • Article 5/10 and Article 45 of CMB By-Law on Takasbank CCP services. • CMB Policy Statement No.10/328	Consistent	
CCP	6.7	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.	A CCP should regularly review and validate its margin system.	• Par 6 of Article 33 of the (new) CMB General By-law on CCI. • Article 40 of CMB By-law on Takasbank CCP Services. • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	7.0	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.		CMB Policy Statement 10/328 CML No.6362 (new) CMB General By-Law on CCI CMB By-Law on Takasbank CCP Services Takasbank Borsa Istanbul Debt Securities Market Directive Takasbank Securities Lending Market Directive Takasbank Borsa İstanbul Money Market Directive Takasbank Borsa Istanbul Equity Market Directive Takasbank Borsa Istanbul Futures and Options Market Directive Takasbank Swap Market Directive CMB Board Decision 31/1221 Directive of the Central Bank of the Republic of Turkey (CBRT) on Turkish Lira Transactions- whole document regulates the rules regarding lines of credit in CBRT (available only in Turkish) CMB By-Law on Takasbank Clearing Services	Broadly consistent	The CMB may consider strengthening and clarifying the framework applying to liquidity stress testing. Takasbank is a bank with access to the central bank, however having a banking licence is not an explicit requirement for a CCP to operate in Turkey (although the CMB has indicated that there is no possibility of having a new national CCP in the near/medium term).
CCP	7.1	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.	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.	•Par 3 of Article 16/C of the (new) CMB General By-Law on CCI. Exposure management •Par 1 of Article 33 of the (new) CMB General By-Law on CCI. •Assessment of liquidity risk. Par 6 of Article 16/B of the (new) CMB General By-Law on CCI. •Concentration risk/limits. Par 5 of Article 34/A of the (new) CMB General By-Law on CCI. •Access to liquidity. Par 6 of Article 16/B of the (new) CMB General By-Law on CCI. Par 2 of Article 31/B of the (new) CMB General By-Law on CCI •Articles 19 (2), 39, 42 and 43 of the CMB By-Law on Takasbank CCP Services. • Article 5 (10) of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	7.2	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.	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.	•Art 79 of CML No.6362. •Article 22, Article 28, Article 33 Paragraphs 9 and 10 of the (new) CMB General By-Law on CCI. • Par 6, 7 and 8 of Article 35 of the CMB By-Law on Takasbank CCP Services. • CMB By-Law on Takasbank Clearing Services, Article 27 • CMB Policy Statement No.10/328	Broadly consistent	Takasbank may use the central bank facilities for intraday liquidity management. However, no precise elements were given on Takasbank's management of intraday liquidity (ie planning, analysis of the possible inflows and outflows etc). The CMB may consider that such planning becomes a requirement for CCPs. The CMB may also consider making it a requirement for the CCP to assess its liquidity position on a near to real time basis. The performance of monthly liquidity stress tests is not enough.
CCP	7.4	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.	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.	• Par 6 of Article 16/B of the (new) CMB General By-Law on CCI. •Article 34/A, paragraph 5 of the (new) CMB General By-Law on CCI . • CMB By-Law on Takasbank CCP Services - Article 19 (2), 39 and 42 (2). • Article 5 (10) of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	7.5	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.	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.	• Article 34/A of the (new) CMB General By-Law on CCI. • CMB Policy Statement No.10/328	Broadly consistent	The CMB may consider specifying the conditions for an asset to be considered liquid. The framework remains very high level. Examples by the CMB show that in practice the authorities require Takasbank to invest cash in "government banks or central bank where credit default rate is zero or almost zero". However, no elements were given on the securities received as collateral.
CCP	7.6	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.	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.	Not Applicable	Not applicable	(there are no other forms of liquid resources (all available assets fall under the scope of PFMI 7.5)

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	7.7	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.	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.	• (new) CMB General By-Law on CCI- Article 16/C-3 • Article 5 (10) of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Consistent	
CCP	7.8	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.	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.	• CMB Policy Statement No.10/328	Broadly consistent	The CMB may consider undertaking an analysis on whether settlement in central bank money would be feasible, in order to ensure complete implementation of this KC. Takasbank has access to the central bank and may use it for liquidity management purposes. However, Takasbank performs settlement in its own accounts.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	7.9	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.	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.	• (new) CMB General By-Law on CCI- Article 33/3, Article 33/4, Article 33/6, Article 33/7(b), Article 33/7(c), Article 33/7(ç), • CMB By-Law on Takasbank CCP Services - Article 5 (10), Article 40 • Board Decision 31/1221 • CMB Policy Statement No.10/328	Consistent	
CCP	7.10	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.	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.	• (new) CMB General By-Law on CCI- Article 24 (2), CCI- Article 40/A-1, • Takasbank Borsa Istanbul Debt Securities Market Directive - Article 17 • Takasbank Securities Lending Market Directive- Article 14 • Takasbank Borsa İstanbul Money Market Directive - Article 12 • Takasbank Borsa Istanbul Equity Market Directive - Article 17 • Takasbank Borsa Istanbul Futures And Options Market Directive - Articles 20-26 • Takasbank Swap Market Directive - Article 12 • CMB Policy Statement 10/328 • CMB Board Decision 31/1221	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	8.0	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.		CMB Policy Statement 10/328 Capital Markets Law No.6362 CMB By-Law on Borsa Istanbul A.S. Principles Relating to Exchange Activities Takasbank OTC Derivatives Market Directive	Consistent	
CCP	8.1	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.	An FMI's rules and procedures should clearly define the point at which settlement is final.	• Capital Markets Law No.6362, Article 79 • (new) CMB General By-Law on CCI, Article 28 • CMB By-Law on Takasbank Clearing Services - Article 27 • CMB Policy Statement 10/328	Consistent	
CCP	8.2	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.	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.	• Article 24, Article 33 Paragraph 10 of the (new) CMB General By-Law on CCI. • Article 18 of the CMB By-Law on Takasbank Clearing Services • Takasbank Borsa Istanbul Debt Securities Market Directive - Article 17 • Takasbank Securities Lending Market Directive - Article 15 • Takasbank Equity Market Directive - Article 17 • Takasbank Borsa Istanbul Swap Market Directive - Article 12 • Takasbank Money Market Directive - Article 12 • CMB Policy Statement No.10/328	Consistent	
CCP	8.3	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.	An FMI should clearly define the point after which unsettled payments, transfer instructions, or other obligations may not be revoked by a participant.	• Capital Markets Law No.6362, Article 79 • For exchange transactions; Article 33 of the CMB By-Law on Borsa Istanbul A.S. Principles Relating to Exchange Activities • For OTC transactions; Article 18 of the Takasbank OTC Derivatives Market Directive (approved by CMB) • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	9.0	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 risk arising from the use of commercial bank money.		CMB Policy Statement 10/328 (new) CMB General By-law on CCI CMB By-law on Takasbank CCP Services Takasbank Debt Securities Market Directive Takasbank Securities Lending Market Directive Takasbank Borsa İstanbul Money Market Directive Takasbank Borsa Istanbul Inc. Equity Market Directive Takasbank Borsa Istanbul Futures and Options Market Directive Takasbank Borsa Istanbul Swap Market Directive	Partly consistent	The CMB may consider undertaking an analysis on whether settlement in central bank money would be feasible, in order to ensure complete implementation of this KC (although the CMB has explained that there are no plans to have a new national CCP in the near/medium future).
CCP	9.1	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 risk arising from the use of commercial bank money.	An FMI should conduct its money settlements in central bank money, where practical and available, to avoid credit and liquidity risks.	• CMB Policy Statement 10/328	Partly consistent	
CCP	9.2	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 risk arising from the use of commercial bank money.	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.	• (new) CMB General By-law on CCI- Article 33/9 • CMB By-law on Takasbank CCP Services - Article 19 • Takasbank Debt Securities Market Directive - Articles 16-24 • Takasbank Securities Lending Market Directive- Article 11 • Takasbank Borsa İstanbul Money Market Directive - Article 16 • Takasbank Borsa Istanbul Inc. Equity Market Directive - Articles 16-25 • Takasbank Borsa Istanbul Futures and Options Market Directive - Articles 15-16 • Takasbank Borsa Istanbul Swap Market Directive - Article 17 • CMB Policy Statement No.10/328	Partly consistent	The CMB may consider undertaking an analysis on whether settlement in central bank money would be feasible, in order to ensure complete implementation of this KC. Takasbank has access to the central bank and may use it for liquidity management purposes. However, Takasbank performs settlement in its own accounts.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	9.3	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 risk arising from the use of commercial bank money.	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.	CMB Policy Statement 10/328	Partly consistent	
CCP	9.4	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 risk arising from the use of commercial bank money.	If an FMI conducts money settlements on its own books, it should minimise and strictly control its credit and liquidity risks.	• (new) CMB General By-law on CCI - Article 16/C-5 • CMB By-law on Takasbank CCP Services - Article 42, Article 43 • CMB Policy Statement No.10/328	Consistent	
CCP	9.5	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 risk arising from the use of commercial bank money.	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.	CMB Policy Statement 10/328	Partly consistent	
CCP	10.0	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.		CMB Policy Statement 10/328 (new) CMB General By-law on CCI CMB By-law on Takasbank CCP Services Takasbank Borsa Istanbul Futures and Options Market Directive	Consistent	
CCP	10.1	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.	An FMI's rules should clearly state its obligations with respect to the delivery of physical instruments or commodities.	• (new) CMB General By-law on CCI - Article 22 (1) and (2) • CMB By-law on Takasbank CCP Services- Article 27, Article 33. • Takasbank Borsa Istanbul Futures and Options Market Directive - Articles 20-39-40. • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	10.2	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.	An FMI should identify, monitor, and manage the risks and costs associated with the storage and delivery of physical instruments or commodities.	• Takasbank Borsa Istanbul Futures and Options Market Directive - Article 20 (5) and Article 38. • CMB Policy Statement No.10/328	Consistent	
CCP	12.0	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.		(new) CMB General By-law on CCI CMB By-law on Takasbank CCP Services Takasbank Borsa Istanbul Debt Securities Market Directive – Takasbank Borsa İstanbul Money Market Directive Takasbank Borsa Istanbul Equity Market Directive Takasbank Borsa Istanbul Swap Market Directive Takasbank Borsa Istanbul Futures and Options Market Directive CMB Policy Statement 10/328	Consistent	
CCP	12.1	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.	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.	• (new) CMB General By-law on CCI - Article 33/10 • CMB By-law on Takasbank CCP Services - Article 21 • Takasbank Borsa Istanbul Debt Securities Market Directive - Article 21 • Takasbank Borsa İstanbul Money Market Directive - Article 15 • Takasbank Borsa Istanbul Equity Market Directive - Article 21 • Takasbank Borsa Istanbul Swap Market Directive- Article-16 • Takasbank Borsa Istanbul Futures and Options Market Directive - Article 20 • CMB Policy Statement No.10/328	Consistent	
CCP	13.0	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.		CML No. 6362 (new) CMB General By-law on CCI CMB By-law on Takasbank CCP Services CMB Policy Statement 10/328	Consistent	The gaps or shortcomings identified have no material impact on completeness or consistency. The CMB may consider the measure that is mentioned under KC 4.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	13.1	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.	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.	• Article 78/3 of the CML No. 6362 (new) CMB General By-law on CCI Articles 31/A and 31/B • CMB By-law on Takasbank CCP Services- Articles between 34-37 • In addition to these documentation, each market directive (https://www.takasbank.com.tr/en/rules-and-regulations/directives)) includes the Default Management section which regulates the market specific issues. • Article 41/5-6-7-8 of the Takasbank on Borsa Istanbul Futures and Options Market Directive • CMB Policy Statement No.10/328	Consistent	
CCP	13.2	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.	An FMI should be well prepared to implement its default rules and procedures, including any appropriate discretionary procedures provided for in its rules.	• Default rules are specified in the CMB By-Laws. In this context Article 31/A and Par 7 of Article 31/B of the (new) CMB General By-Law on CCI and Articles 34-37 of the CMB By-law on Takasbank CCP Services. • In addition to this documentation, each market directive (https://www.takasbank.com.tr/en/rules-and-regulations/directives) • CMB Policy Statement No.10/328	Consistent	
CCP	13.3	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.	An FMI should publicly disclose key aspects of its default rules and procedures.	• (new) CMB General By-law on CCI Article 38/A(1)-b • CMB Policy Statement No.10/328	Consistent	
CCP	13.4	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.	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.	•Article 16/B(1) of the (new) CMB General By-Law on CCI •Article 16/B(3) of the (new) CMB General By-Law on CCI •Article 31/B(7) of the (new) CMB General By-Law on CCI •Article 33/6 of the (new) CMB General By Law on CCI •Article 33/7-b of the (new) CMB General By-Law on CCI • Article 5/10 of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Broadly consistent	The CMB may ensure that clear requirements are in so that the testing and review of default management procedures is also carried out after material changes of the CCP rules and procedures.
CCP	14.0	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.		CMB Policy Statement 10/328 Capital Markets Law No. 6362 (new) CMB General By-Law on CCI CMB By-law on Takasbank CCP Services CMB By-law on Takasbank Clearing Services	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	14.1	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.	A CCP should, at a minimum, have segregation and portability arrangements that effectively protect a participant's customers' positions and related collateral from the default or insolvency of that participant. If the CCP additionally offers protection of such customer positions and collateral against the concurrent default of the participant and a fellow customer, the CCP should take steps to ensure that such protection is effective.	• Capital Markets Law No. 6362-Article 78/2, Article 46/4-5-6 • Article 25/B, of the (new) CMB General By-Law on CCI • CMB By-law on Takasbank CCP Services – Article 20, Article 25, Article 26, Article 32 (2) and Article 35 (2) • CMB By-law on Takasbank Clearing Services, Article 42 • CMB Policy Statement No.10/328	Consistent	
CCP	14.2	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.	A CCP should employ an account structure that enables it readily to identify positions of a participant's customers and to segregate related collateral. A CCP should maintain customer positions and collateral in individual customer accounts or in omnibus customer accounts.	• Capital Markets Law No. 6362-Article 78/4 • CMB By-law on Takasbank CCP Services - Article 20 and Article 25 • CMB Policy Statement No.10/328	Consistent	
CCP	14.3	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.	A CCP should structure its portability arrangements in a way that makes it highly likely that the positions and collateral of a defaulting participant's customers will be transferred to one or more other participants.	• CMB By-law on Takasbank CCP Services - Article 26, Article 37 • CMB Policy Statement No.10/328	Consistent	
CCP	14.4	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.	A CCP should disclose its rules, policies, and procedures relating to the segregation and portability of a participant's customers' positions and related collateral. In particular, the CCP should disclose whether customer collateral is protected on an individual or omnibus basis. In addition, a CCP should disclose any constraints, such as legal or operational constraints, that may impair its ability to segregate or port a participant's customers' positions and related collateral.	• CMB By-law on Takasbank CCP Services- Article 5/10 Article 25, Article 26 • CMB Policy Statement No.10/328	Consistent	
CCP	15.0	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.		CMB Policy Statement 10/328 (new) CMB General By-Law on CCI CMB By-law on Takasbank CCP Services	Broadly consistent	The CMB may consider the measures that are mentioned under KC 3 and KC 5.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	15.1	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.	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.	• Article 16/C(2) of the (new) CMB General By-Law on CCI • Article 30/3(b)-3 of the (new) CMB General By-Law on CCI • 30/C(1)-c of General By-law on CCI • CMB By-law on Takasbank CCP Services - Article 39 • Article 5/10 of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Consistent	
CCP	15.2	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.	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.	• (new) CMB General By-law on CCI- Article 30- 3 (b) • CMB By-law on Takasbank CCP Services - Article 39 • Article 5/10 of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Consistent	
CCP	15.3	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.	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.	• (new) CMB `General By-law on CCI- Article 30- 3-b •Article 31/B(7) of the (new) CMB General By-Law on CCI Article 40/A of the (new) CMB General By-Law on CCI • CMB By-law on CCP Services of Takasbank- Article 39 • Article 5/10 of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Partly consistent	The CMB may consider including legal requirements for CCPs to set up a specific recovery and orderly wind-down plan according to the PFMI and recovery plan.
CCP	15.4	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.	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.	• (new) CMB General By-law on CCI- Article 30-/3(b) • CMB By-law on Takasbank CCP Services - Article 39 • Article 5/10 of the By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	15.5	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.	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 board of directors and updated regularly.	• Article 31/2 of the (new) CMB General By-Law on CCI • CMB By-law on Takasbank CCP Services - Articles 36/6-7 and 48/1 • Article 5/10 of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Partly consistent	The CMB may consider requiring CCPs to hold a viable plan for raising equity (approved by their Board).
CCP	16.0	An FMI should safeguard its own and its participants' assets and minimise 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.		CMB Policy Statement 10/328 Capital Markets Law No. 6362 (new) CMB General By-law on CCI CMB By-Law on Takasbank CCP Services	Consistent	
CCP	16.1	An FMI should safeguard its own and its participants' assets and minimise 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.	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.	• Capital Markets Law No. 6362- Article 73/2 • (new) CMB General By-law on CCI Article 34/A • Article 5/10 of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Consistent	
CCP	16.2	An FMI should safeguard its own and its participants' assets and minimise 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.	An FMI should have prompt access to its assets and the assets provided by participants, when required.	• Capital Markets Law No. 6362- Article 79/3 •Article 34/A(3)-(4) of the (new) CMB General By-Law on CCI • CMB Policy Statement No.10/328	Consistent	
CCP	16.3	An FMI should safeguard its own and its participants' assets and minimise 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.	An FMI should evaluate and understand its exposures to its custodian banks, taking into account the full scope of its relationships with each.	• Par 6 of Article 16/B of the (new) CMB General By-Law on CCI • CMB Policy Statement No.10/328	Consistent	
CCP	16.4	An FMI should safeguard its own and its participants' assets and minimise 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.	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.	• Article 34/A of the (new) CMB General By-Law on CCI • CMB By-law on Takasbank CCP Services - Article 22 • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	17.0	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.		CMB Policy Statement 10/328 Capital Markets Law No. 6362 (new) CMB General By-Law on CCI CMB By-Law on Takasbank CCP Services CMB Communiqué on the Management of Information Systems (Serial No. VII-128.9)	Consistent	
CCP	17.1	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.	An FMI should establish a robust operational risk-management framework with appropriate systems, policies, procedures, and controls to identify, monitor, and manage operational risks.	Capital Markets Law No. 6362- Article 78/4-5 • Article 16/C-1-2-4of the (new) CMB General By-Law on CCI • Article 5/10 of CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Consistent	
CCP	17.2	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.	An FMI's board of directors 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.	• (new) CMB General By-law on CCI- Article 13- 1/e, h, ı, Article 16/B(3), Article 16/C- 1, 2, 4 • Article 5/10 of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	17.3	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.	An FMI should have clearly defined operational reliability objectives and should have policies in place that are designed to achieve those objectives.	• Article 10 of the (new) CMB General By-Law on CCI • Article 13/ı of the (new) CMB General By-Law on CCI • Article 5/10 of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Consistent	
CCP	17.4	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.	An FMI should ensure that it has scalable capacity adequate to handle increasing stress volumes and to achieve its service-level objectives.	• (new) CMB General By-law on CCI- Article 16/C(6) • Article 5/10 of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Consistent	
CCP	17.5	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.	An FMI should have comprehensive physical and information security policies that address all potential vulnerabilities and threats.	• (new) CMB General By-Law on CCI - Article 16/C(6)-(7) • Article 6 and 12 of the CMB Communiqué on the Management of Information Systems (Serial No. VII-128.9) • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	17.6	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.	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.	• (new) CMB General By-law on CCI-Article 40/A • CMB Policy Statement No.10/328	Consistent	
CCP	17.7	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.	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.	• (new) CMB General By-law on CCI Articles 16/B(6), 33/1 and 33/B(1) and 35/B(1)-f • Article 5/10 of the CMB By-Law on Takasbank CCP Services • CMB Policy Statement No.10/328	Consistent	
CCP	18.0	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.		CMB Policy Statement 10/328 Capital Markets Law No. 6362 (new) CMB General By-law on CCI CMB By-law on Takasbank CCP Services CMB By-law on Takasbank Clearing Services (TaKasbank) Market Directives (as approved by CMB)	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	18.1	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.	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.	• Capital Markets Law No. 6362- Article 77/2 and 78/4 • (new) CMB General By-law on CCI-Article 9/ 2,7 and Article 10/ 1-e • CMB By-law on Takasbank CCP Services - Articles 7 CMB By-law on Takasbank Clearing Services, Article 9 • In addition to this documentation, each market directive (all approved by CMB) • CMB Policy Statement No.10/328	Consistent	
CCP	18.2	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.	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 endeavour to set requirements that have the least-restrictive impact on access that circumstances permit.	• (new) CMB General By-law on CCI - Article 9/ 2, 7 and Article 10/ 1-a , 1-e, and Article 19 • CMB By-law on Takasbank CCP Services - Articles 7- 8-11 • In addition to these documentation, each market directive approved by CMB contains regulations on the issue • CMB Policy Statement No.10/328	Consistent	
CCP	18.3	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.	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.	• CMB By-law on Takasbank CCP Services - Articles 14-15 • In addition to this documentation, each market directive contains regulations on the issue) • CMB Policy Statement No.10/328	Consistent	
CCP	19.0	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.		CMB Policy Statement 10/328 (new) CMB General By-Law on CCI CMB By-law on Takasbank CCP Services Market Directives (TaKasbank) (as approved by CMB)	Partly consistent	It is recommended that the CMB addresses any gaps, including by having relevant rules to properly address the risks arising from tiered participation. This recommendation would complement the CMB Policy Statement that is applicable to CCPs, which requires "all FMIs operating in Turkish capital markets either currently or in the future […] to pay due care and diligence in complying with CPMI-IOSCO PFMI".
CCP	19.1	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	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.	• (new) CMB General By-law on CCI - Articles 10/1(ç), and Article 21. • CMB By-law on Takasbank CCP Services – Articles 12 and Article 16 CMB Policy Statement 10/328	Partly consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	19.2	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	An FMI should identify material dependencies between direct and indirect participants that might affect the FMI.	• CMB By-law on Takasbank CCP Services - Article 16 Market Directives CMB Policy Statement 10/328	Partly consistent	
CCP	19.3	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	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.	• CMB By-law on Takasbank CCP Services - Article 16 • Market Directives CMB Policy Statement 10/328	Partly consistent	
CCP	19.4	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	An FMI should regularly review risks arising from tiered participation arrangements and should take mitigating action when appropriate.	• Article 16/C Par 2 and 3 of the (new) CMB General By-Law on CCI • CMB By-law on Takasbank CCP Services - Article 10/3 and Article 16 • Market Directives CMB Policy Statement 10/328	Partly consistent	
CCP	20.0	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.		CMB Policy Statement 10/328 (new) CMB General By-law on CCI	Consistent	
CCP	20.1	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	• (new) CMB General By-law on CCI- Article 33/B1-a and B1-b • CMB Policy Statement No.10/328	Consistent	
CCP	20.2	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	• (new) CMB General By-Law on CCI Article 33/A • CMB Policy Statement No.10/328	Consistent	
CCP	20.7	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	• (new) CMB General By-law on CCI - Article 33 B/ (1)-c and B(4) • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	20.8	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	• (new) CMB General By-law on CCI – Article 33, Article 33/A(3)-b, Article 33/B1- a, c and ç • CMB Policy Statement No.10/328	Consistent	
CCP	21.0	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.		CMB Policy Statement 10/328 (new) CMB General By-law on CCI	Consistent	
CCP	21.1	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.	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.	• (new) CMB General By-law on CCI - Article 10/ 1, Article 40/A • CMB Policy Statement No.10/328	Consistent	
CCP	21.2	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.	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.	• (new) CMB General By-law on CCI - Article 10/1-e, Article 13(ı)-ı • CMB Policy Statement No.10/328	Consistent	
CCP	21.3	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.	An FMI should have established mechanisms for the regular review of its efficiency and effectiveness.	• (new CMB General By-law on CCI Article 16/C-(1)-(4) • CMB Policy Statement No.10/328	Consistent	
CCP	22.0	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.		(new) CMB General By-law on CCI - Article 16/C(6), Article 30/Ç(4) and Ç(d) CMB Policy Statement No.10/328	Consistent	
CCP	22.1	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.	An FMI should use, or at a minimum accommodate, internationally accepted communication procedures and standards.	• (new) CMB General By-law on CCI - Article 16/C(6), Article 30/Ç(4) and Ç(d) • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	23.0	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.		CMB Policy Statement No.10/328 (new) CMB General By-Law on CCI CMB By-law on Takasbank CCP services CMB By-law on Takasbank Clearing Services	Consistent	
CCP	23.1	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.	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.	• (new) CMB General By-law on CCI Article 10/2, Article 38/A. and Article 35 • CMB By-law on Takasbank CCP services • CMB Policy Statement No.10/328	Consistent	
CCP	23.2	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.	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.	• CMB By-law on Takasbank CCP services • Articles 35 and 38/A of the new) CMB General By-Law on CCI • CMB Policy Statement No.10/328	Consistent	
CCP	23.3	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.	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.	• CMB By-law on Takasbank Clearing Services, Article 55-60 • CMB By-law on Takasbank CCP services • Articles 35 and 38/A of the (new) CMB General By-Law on CCI • CMB Policy Statement No.10/328	Consistent	
CCP	23.4	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.	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.	• Article 35, Article 38/A and Article 10/1(i) of the (new) CMB General By-Law on CCI • CMB Policy Statement No.10/328	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CCP	23.5	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.	An FMI should complete regularly and disclose publicly responses to the CPSS-IOSCO Disclosure framework for financial market infrastructures. An FMI also should, at a minimum, disclose basic data on transaction volumes and values.	• CMB Policy Statement No.10/328 • Article 5/10 of the CMB By-Law on Takasbank CCP Services • Article 38/A of the (new) CMB General By-Law on CCI.	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	1.0	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.		CMB Decision No. 10/328 (23 March 2016), also known as CMB Policy Statement 10/328. Capital Markets Law (CML) No 6362 - Article 13 “Dematerialisation of capital market instruments” Article 17 “Corporate governance principles” Article 80 “Central securities depositories” Article 81 “Central Registry Agency” Article 103/1 “Actions Requiring Administrative Fine” Regulation on the Establishment, Operation, Conduct And Audit Principles of the Central Securities Depository (CMB MKK Regulation), Article 8 “Qualifications shareholders, managers and specialist staff must possess” Article 9 “Duties and authorities of the MKK” Article 10 “Terms of Operation” Article 11 “Operation rules and principles” Article 13 “Board of Directors” Article 14 “Duties and authorities of the Board of Directors in compliance with the capital market Legislation” Article 15 “Meeting and decision quorums” Article 16 “General manager and Vice general managers” Article 17 “MKK organization and staff” Article 20 “MKK participants” Article 21 “Membership terms” Article 22 “Acceptance to membership” Article 23 “Leaving membership” Article 24 “Temporary suspension or revocation of membership” Article 25 “Participant's responsibilities, operation principles and measures to be applied” Article 33 “Disciplinary penalties” Article 35 “Corporate governance principles” CMB Communiqué on The Procedures And Principals for The Book-Keeping of Dematerialized Capital Market Instruments (The Dematerialization Communiqué) Article 5 “Keeping records” Article 6 “Accounts” Article 17 “Recording trading transactions” CMB Communiqué on Management of Information Systems (VII-128.9) Article 5 “Establishment and Implementation of Management of Information Systems” Article 6 “Information Security Policy” Article 7 “Supervision and Responsibility of Senior Management” Article 8 “Information Systems Risk Management” Article 9 “Establishment and Management of Information Systems Controls” Article 26 “Continuity of Information Systems” CMB Communiqué on Corporate Governance (II-17.1) Annex 1 Article 3 Paragraphs 3.1.1, 3.1.2, 3.1.3, 3.1.4, 3.1.5 Article 4 Paragraphs 4.1.1, 4.2.3, 4.2.4, 4.5.1 4.5.12	Broadly consistent	Given that CMB Policy Statement 10/328 is the only implementation measure for certain Principles and/or KCs and the lack of supervisory evidence that would help the AT to understand the application of CMB Policy Statement 10/328, it is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	1.1	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	The legal basis should provide a high degree of certainty for each material aspect of an FMI's activities in all relevant jurisdictions.	CMB Decision No. 10/328 (23 March 2016), also known as CMB Policy Statement 10/328. CML Article 13 "Dematerialization of Capital Markets Instruments" Article 80 "Central Securities Depository" Article 81 "Merkezi Kayit Kurulusu" Article 103/1 "Actions Requiring Administrative Fine" CMB MKK Regulation Article 8 "Qualifications shareholders, managers and specialist staff must possess" Article 9 "Duties and authorities of the MKK" Article 10 "Terms of Operation" Article 11 "Operation rules and principles" Article 13 "Board of Directors" Article 14 "Duties and authorities of the Board of Directors in compliance with the capital market Legislation" Article 15 "Meeting and decision quorums" Article 16 "General manager and Vice general managers" Article 17 "MKK organization and staff" Article 20 "MKK participants" Article 21 "Membership terms" Article 22 "Acceptance to membership" Article 23 "Leaving membership" Article 24 "Temporary suspension or revocation of membership" Article 25 "Participant's responsibilities, operation principles and measures to be applied" Article 33 "Disciplinary penalties" Article 35 "Corporate governance principles" The Dematerialization Communiqué Article 5 "Keeping records" Article 6 "Accounts" Article 17 "Recording trading transactions" CMB Communiqué on Management of Information Systems (VII-128.9) Article 5 "Establishment and Implementation of Management of Information Systems" Article 6 "Information Security Policy" Article 7 "Supervision and Responsibility of Senior Management" Article 8 "Information Systems Risk Management" Article 9 "Establishment and Management of Information Systems Controls" Article 26 "Continuity of Information Systems" CMB Communiqué on Corporate Governance (II-17.1)Annex 1 Article 3 Paragraphs 3.1.1, 3.1.2, 3.1.3, 3.1.4, 3.1.5 Article 4 Paragraphs 4.1.1, 4.2.3, 4.2.4, 4.5.1 4.5.12	Broadly consistent	It is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	1.2	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	An FMI should have rules, procedures, and contracts that are clear, understandable, and consistent with relevant laws and regulations.	CMB Policy Statement No.10/328 CML Article 13 "Dematerialization of Capital Markets Instruments" Article 80 "Central Securities Depository" Article 81 "Merkezi Kayit Kurulusu" CMB MKK Regulation Article 11 "Operation rules and principles" Dematerialization Communiqué Article 5 “Keeping records” Article 6 “Accounts” Article 17 “Recording trading transactions”	Broadly consistent	It is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	1.3	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	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.	CMB Policy Statement No.10/328 CML Article 13 "Dematerialization of Capital Markets Instruments" Article 80 "Central Securities Depository" Article 81 "Merkezi Kayit Kurulusu" CMB MKK Regulation Article 8 "Qualifications shareholders, managers and specialist staff must possess" Article 9 "Duties and authorities of the MKK" Article 10 "Terms of Operation" Article 11 "Operation rules and principles" Article 13 "Board of Directors" Article 14 "Duties and authorities of the Board of Directors in compliance with the capital market Legislation" Article 15 "Meeting and decision quorums" Article 16 "General manager and Vice general managers" Article 17 "MKK organization and staff" Article 20 "MKK participants" Article 21 "Membership terms" Article 22 "Acceptance to membership" Article 23 "Leaving membership" Article 24 "Temporary suspension or revocation of membership" Article 25 "Participant's responsibilities, operation principles and measures to be applied" Article 33 "Disciplinary penalties" Article 35 "Corporate governance principles" Dematerialization Communiqué Article 5 "Keeping records" Article 6 "Accounts" Article 17 "Recording trading transactions" CMB Communiqué on Management of Information Systems Article 5 "Establishment and Implementation of Management of Information Systems" Article 6 "Information Security Policy" Article 7 "Supervision and Responsibility of Senior Management" Article 8 "Information Systems Risk Management" Article 9 "Establishment and Management of Information Systems Controls" Article 26 "Continuity of Information Systems" CMB Communiqué on Corporate Governance Annex 1 Article 3 Paragraphs 3.1.1, 3.1.2, 3.1.3, 3.1.4, 3.1.5 Article 4 - Paragraphs 4.1.1, 4.2.3, 4.2.4, 4.5.1, 4.5.12	Consistent	
CSD	1.4	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	1.5	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	An FMI conducting business in multiple jurisdictions should identify and mitigate the risks arising from any potential conflict of laws across jurisdictions.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	2.0	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.		CMB Policy Statement No.10/328 CMB MKK Regulation Article 8 "Qualifications shareholders, managers and specialist staff must possess" Article 9 "Duties and authorities of MKK" Article 11 "Operation rules and principles" Article 13 "Board of Directors" Article 14 "Duties and authorities of the Board of Directors in compliance with the capital market legislation" Article 15 "Meeting and decision quorums" Article 16 "General manager and Vice general managers" Article 17 "MKK organization and staff" Article 35 "Corporate governance principles" CML Article 17 "Corporate governance principles" CMB Communiqué on Corporate Governance (II-17.1) Annex 1 Article 3 “Stakeholders” Paragraphs 3.1.1, 3.1.2, 3.1.3, 3.1.4, 3.1.5 Article 4 "Board of Directors"	Broadly consistent	It is recommended that a mechanism be adopted for the sharing of governance arrangements with the CMB. It is recommended that the CMB ensures the introduction of implementation measures for the review of the performances of individual Board members, and to identify, address and manage conflicts of interest.
CSD	2.1	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.	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.	CMB Policy Statement No.10/328 CMB MKK Regulation Article 9 "Duties and authorities of MKK" Article 11 "Operation rules and principles"	Consistent	
CSD	2.2	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.	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.	CMB Policy Statement No.10/328 CML Article 17 "Corporate governance principles" CMB MKK Regulation Article 35 "Corporate governance principles"	Consistent	It is recommended that a mechanism be adopted for the sharing of governance arrangements with the CMB.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	2.3	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.	The roles and responsibilities of an FMI's board of directors (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.	CMB Policy Statement No.10/328 CMB MKK Regulation, Article No:13 "Board of Directors" Article No:14 "Duties and authorities of the Board of Directors in compliance with the capital market legislation" Article No:15 "Meeting and decision quorums" CMB Communiqué on Corporate Governance (II-17.1) Annex 1, Article 4 "Board of Directors"	Broadly consistent	It is recommended that the CMB ensures the introduction of implementation measures for the review of the performances of individual Board members, and to identify, address, and manage conflicts of interest.
CSD	2.4	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.	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).	CMB Policy Statement No.10/328 CMB MKK Regulation, Article 8 "Qualifications shareholders, managers and specialist staff must possess" Article 13 "Board of Directors"	Consistent	
CSD	2.5	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.	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.	CMB Policy Statement No.10/328 CMB MKK Regulation, Article 8 "Qualifications shareholders, managers and specialist staff must possess" Article 14 "Duties and authorities of the Board of Directors in compliance with the capital market legislation" Article 16 "General manager and Vice general managers" Article 17 "MKK organization and staff"	Consistent	
CSD	2.6	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.	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.	CMB Policy Statement No.10/328 CMB Communiqué on Corporate Governance (II-17.1) Annex 1 Article 4 Paragraph 4.1.1 Paragraph 4.2.3 Paragraph 4.2.4 Paragraph 4.5.1 Paragraph 4.5.12	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	2.7	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.	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.	CMB Policy Statement No.10/328 CMB MKK Regulation Article 11 "Operation rules and principles" Article 14 "Duties and authorities of the Board of Directors in compliance with the capital market legislation" CMB Communiqué on Corporate Governance (II-17.1) Annex 1 Article: 3. Stakeholders Paragraph 3.1.1 Paragraph 3.1.2 Paragraph 3.1.3 Paragraph 3.1.4 Paragraph 3.1.5 Article, 4. Board of Directors Paragraph 4.2.3	Consistent	
CSD	3.0	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.		CMB Policy Statement No.10/328 CMB MKK Regulation Article 9 "Duties and authorities of MKK" Article 10 "Terms of Operation" Article 21 "Membership terms" Article 24 "Temporary suspension or revocation of membership" Article 25 "Participant's responsibilities, operation principles and measures to be applied" CMB Communiqué on Management of Information Systems (VII-128.9) Article 8 "Information Systems Risk Management" Article 9 "Establishment and Management of Information Systems Controls"	Partly consistent	Given that CMB Policy Statement 10/328 is the only implementation measure for certain Principles and/or KCs and the lack of supervisory evidence that would help the AT to understand the application of CMB Policy Statement 10/328, it is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	3.1	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	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.	CMB Policy Statement No.10/328 CMB MKK Regulation Article 10, "Terms of Operation", Paragraph 1 CMB Communiqué on Management of Information Systems (VII-128.9) Article 8 "Information Systems Risk Management" Article 9 "Establishment and Management of Information Systems Controls"	Consistent	
CSD	3.2	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	An FMI should provide incentives to participants and, where relevant, their customers to manage and contain the risks they pose to the FMI.	CMB Policy Statement No.10/328 CMB MKK Regulation Article 9 "Duties and authorities of the MKK", Paragraph 1(b). Article 21 "Membership terms", Paragraph 1(b). Article 25 "Participant's responsibilities, operation principles and measures to be applied" Paragraph 2(c), Paragraph 3. Article 24 "Temporary suspension or revocation of membership", Paragraph 2(g).	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	3.3	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	3.4	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	10.0	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.		Not Applicable	Not applicable	MKK is responsible for the custody of dematerialised capital markets instruments therefore the principle on physical securities was marked as not applicable.
CSD	10.1	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.	An FMI's rules should clearly state its obligations with respect to the delivery of physical instruments or commodities.	Not Applicable	Not applicable	MKK is responsible for the custody of dematerialised capital markets instruments therefore the principle on physical securities was marked as not applicable.
CSD	10.2	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.	An FMI should identify, monitor, and manage the risks and costs associated with the storage and delivery of physical instruments or commodities.	Not Applicable	Not applicable	MKK is responsible for the custody of dematerialised capital markets instruments therefore the principle on physical securities was marked as not applicable.
CSD	11.0	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.		CMB Policy Statement No.10/328 CML Article 13 "Dematerialisation of capital market instruments" Article 46 "Guarantees, investor assets and utilization principles" Dematerialization Communiqué CMB MKK Regulation Article 9 "Duties and authorities of MKK"	Partly consistent	Given that CMB Policy Statement 10/328 is the only implementation measure for certain Principles and/or KCs and the lack of supervisory evidence that would help the AT to understand the application of the CMB Policy Statement 10/328, it is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	11.1	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.	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.	CMB Policy Statement No.10/328 CML Article 13 "Dematerialisation of capital market instruments" Paragraph 1. Dematerialization Communiqué Article 5 “Keeping records” Paragraph 1 CMB MKK Regulation Article 9 “Duties and authorities of the MKK” Paragraph 1 (b)	Consistent	
CSD	11.2	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.	A CSD should prohibit overdrafts and debit balances in securities accounts.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	11.3	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.	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.	CMB Policy Statement No.10/328 CML Article 13 "Dematerialisation of capital market instruments"	Consistent	
CSD	11.4	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.	A CSD should protect assets against custody risk through appropriate rules and procedures consistent with its legal framework.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	11.5	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.	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.	CMB Policy Statement No.10/328 CML Article 13 "Dematerialisation of capital market instruments" Article 46 "Guarantees, investor assets and utilization principles" Dematerialization Communiqué Article 5 "Keeping records" Article 17 "Recording trading transactions"	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	11.6	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.	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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	13.0	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.		Not Applicable	Not applicable	MKK, as a CSD only responsible for the settlement and custody of securities, do not carry any risks related to cash clearing and settlement activities such as credit, liquidity or collateral management. Furthermore, as the fails management mechanism is conducted by Takasbank, the CCP, MKK will not be subject to any liabilities in case of a member default or resolution.
CSD	13.1	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.	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.	Not Applicable	Not applicable	MKK, as a CSD only responsible for the settlement and custody of securities, do not carry any risks related to cash clearing and settlement activities such as credit, liquidity or collateral management. Furthermore, as the fails management mechanism is conducted by Takasbank, the CCP, MKK will not be subject to any liabilities in case of a member default or resolution.
CSD	13.2	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.	An FMI should be well prepared to implement its default rules and procedures, including any appropriate discretionary procedures provided for in its rules.	Not Applicable	Not applicable	MKK, as a CSD only responsible for the settlement and custody of securities, do not carry any risks related to cash clearing and settlement activities such as credit, liquidity or collateral management. Furthermore, as the fails management mechanism is conducted by Takasbank, the CCP, MKK will not be subject to any liabilities in case of a member default or resolution.
CSD	13.3	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.	An FMI should publicly disclose key aspects of its default rules and procedures.	Not Applicable	Not applicable	MKK, as a CSD only responsible for the settlement and custody of securities, do not carry any risks related to cash clearing and settlement activities such as credit, liquidity or collateral management. Furthermore, as the fails management mechanism is conducted by Takasbank, the CCP, MKK will not be subject to any liabilities in case of a member default or resolution.
CSD	13.4	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.	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.	Not Applicable	Not applicable	MKK, as a CSD only responsible for the settlement and custody of securities, do not carry any risks related to cash clearing and settlement activities such as credit, liquidity or collateral management. Furthermore, as the fails management mechanism is conducted by Takasbank, the CCP, MKK will not be subject to any liabilities in case of a member default or resolution.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	15.0	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.		CMB Policy Statement No.10/328 CMB MKK Regulation Article 10 "Terms of Operation" Article 11 "Operation rules and principles" Article 27 "Budget and staff positions" Article 28 "Revenues, fees and commissions"	Partly consistent	Given that CMB Policy Statement 10/328 is the only implementation measure for certain Principles and/or KCs and the lack of supervisory evidence that would help the AT to understand the application of CMB Policy Statement 10/328, it is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	15.1	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.	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.	CMB Policy Statement No.10/328 CMB MKK Regulation Article 6 “Share ownership and articles of association” Article 10 "Terms of Operation" Article 11 "Operation rules and principles" Article 27 "Budget and staff positions" Article 28 "Revenues, fees and commissions"	Partly consistent	The provisions of the CMB MKK Regulation that are mentioned for this KC refer to operational risks rather than general business risk and therefore CMB Policy Statement 10/328 would be the only implementation measure for this KC. It is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	15.2	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.	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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	15.3	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.	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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	15.4	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.	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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	15.5	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.	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 board of directors and updated regularly.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	16.0	An FMI should safeguard its own and its participants' assets and minimise 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.		CMB Policy Statement No.10/328	Partly consistent	Given that CMB Policy Statement 10/328 is the only implementation measure for certain Principles and/or KCs and the lack of supervisory evidence that would help the AT to understand the application of CMB Policy Statement 10/328, it is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	16.1	An FMI should safeguard its own and its participants' assets and minimise 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.	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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	16.2	An FMI should safeguard its own and its participants' assets and minimise 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.	An FMI should have prompt access to its assets and the assets provided by participants, when required.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	16.3	An FMI should safeguard its own and its participants' assets and minimise 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.	An FMI should evaluate and understand its exposures to its custodian banks, taking into account the full scope of its relationships with each.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	16.4	An FMI should safeguard its own and its participants' assets and minimise 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.	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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	17.0	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.		CMB Policy Statement No.10/328 CMB MKK Regulation Article 9 "Duties and authorities of MKK" Article 10 "Terms of Operation" Article 11 "Operation rules and principles" CMB Communiqué on Management of Information Systems (VII-128.9)	Partly consistent	Given that CMB Policy Statement 10/328 is the only implementation measure for certain Principles and/or KCs and the lack of supervisory evidence that would help the AT to understand the application of CMB Policy Statement 10/328, it is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation. It is recommended that the CMB considers measures in relation to resumption of operations within two hours following disruptive events and complete settlement by the end of the day of the disruption, even in the event of a wide-scale or major disruption.
CSD	17.1	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.	An FMI should establish a robust operational risk-management framework with appropriate systems, policies, procedures, and controls to identify, monitor, and manage operational risks.	CMB Policy Statement No.10/328	Consistent	
CSD	17.2	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.	An FMI's board of directors 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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	17.3	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.	An FMI should have clearly defined operational reliability objectives and should have policies in place that are designed to achieve those objectives.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	17.4	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.	An FMI should ensure that it has scalable capacity adequate to handle increasing stress volumes and to achieve its service-level objectives.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	17.5	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.	An FMI should have comprehensive physical and information security policies that address all potential vulnerabilities and threats.	CMB Policy Statement No.10/328 CMB MKK Regulation Article 9 "Duties and authorities of the MKK" Article 10 "Terms of Operation" Article 11 "Operation rules and principles" CMB Communiqué on Management of Information Systems (VII-128.9) Article 5 "Establishment and Implementation of Management of Information Systems" Paragraph 2 Article 6 "Information Security Policy"	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	17.6	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.	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.	CMB Policy Statement No.10/328 CMB Communiqué on Management of Information Systems (VII-128.9) Article 7 "Supervision and Responsibility of Senior Management" Paragraph 6 Article 26 "Continuity of Information Systems"	Partly consistent	It is recommended that the CMB considers requirements in relation to the resumption of operations within two hours following disruptive events and to complete settlement by the end of the day of the disruption, even in the event of a wide-scale or major disruption.
CSD	17.7	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.	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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures the implementation of the CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	18.0	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.		CMB Policy Statement No.10/328 CML Article 13 "Dematerialisation of capital market instruments" CMB MKK Regulation Article 20 "MKK participants" Article 21 "Membership terms" Article 22 "Acceptance to membership" Article 23 "Leaving membership" Article 24 "Temporary suspension or revocation of membership" Article 25 "Participant's responsibilities, operation principles and measures to be applied" Dematerialization Communiqué	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	18.1	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.	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.	CMB Policy Statement No.10/328 CML Article 13 "Dematerialisation of capital market instruments" CMB MKK Regulation Article 20 “MKK participants” Article 21 "Membership terms" Article 22 “Acceptance to membership” Article 23 “Leaving membership” Article 24 "Temporary suspension or revocation of membership" Article 25 "Participant's responsibilities, operation principles and measures to be applied” Dematerialization Communiqué Article 6	Consistent	
CSD	18.2	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.	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 endeavour to set requirements that have the least-restrictive impact on access that circumstances permit.	CMB Policy Statement No.10/328 CML Article 13 "Dematerialisation of capital market instruments" CMB MKK Regulation Article 20 “MKK participants” Article 21 "Membership terms" Article 22 “Acceptance to membership” Article 23 “Leaving membership” Article 24 "Temporary suspension or revocation of membership" Article 25 "Participant's responsibilities, operation principles and measures to be applied" Dematerialization Communiqué Article 6	Consistent	
CSD	18.3	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.	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.	CMB Policy Statement No.10/328 CMB MKK Regulation Article 24 "Temporary suspension or revocation of membership" Article 25 "Participant's responsibilities, operation principles and measures to be applied" Article 33 "Disciplinary penalties"	Consistent	
CSD	19.0	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.		CMB Policy Statement No.10/328	Partly consistent	Although indirect participation is not defined in the regulation for CSDs, indirect participation is not forbidden under the applicable regulatory framework. It is recommended that the CMB addresses any gaps, including by having relevant rules to properly address the risks arising from tiered participation. This would complement the CMB Policy Statement that is applicable to CSDs, which requires “all FMIs operating in Turkish capital markets either currently or in the future […] to pay due care and diligence in complying with CPMI-IOSCO PFMI”.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	19.1	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	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.	CMB Policy Statement No.10/328	Partly consistent	
CSD	19.2	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	An FMI should identify material dependencies between direct and indirect participants that might affect the FMI.	CMB Policy Statement No.10/328	Partly consistent	
CSD	19.3	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	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.	CMB Policy Statement No.10/328	Partly consistent	
CSD	19.4	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	An FMI should regularly review risks arising from tiered participation arrangements and should take mitigating action when appropriate.	CMB Policy Statement No.10/328	Partly consistent	
CSD	20.0	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.		CMB Policy Statement No.10/328	Partly consistent	Given that CMB Policy Statement 10/328 is the only implementation measure for certain Principles and/or KCs and the lack of supervisory evidence that would help the AT to understand the application of the CMB Policy Statement 10/328, it is recommended that the CMB ensures implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	20.1	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	20.2	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	20.3	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	20.4	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	20.5	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	CMB Policy Statement No.10/328	Partly consistent	It is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	20.6	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	Not Applicable	Not applicable	MKK do not have any indirect links with FMIs.
CSD	21.0	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.		CMB Policy Statement No.10/328	Partly consistent	Given that CMB Policy Statement 10/328 is the only implementation measure for certain Principles and/or KCs and the lack of supervisory evidence that would help the AT to understand the application of CMB Policy Statement 10/328, it is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	21.1	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.	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.	CMB Policy Statement No.10/328 CMB MKK Regulation Article 10 "Terms of Operation" Article 11 "Operation rules and principles"	Consistent	
CSD	21.2	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.	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.	CMB Policy Statement No.10/328	Partly consistent	CMB is recommended to ensure implementation of the CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	21.3	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.	An FMI should have established mechanisms for the regular review of its efficiency and effectiveness.	CMB Policy Statement No.10/328	Partly consistent	CMB is recommended to ensure implementation of the CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	22.0	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.		CMB Policy Statement No.10/328	Partly consistent	Given that CMB Policy Statement 10/328 is the only implementation measure for this Principle and considering the lack of supervisory evidence that would help the AT to understand the application of CMB Policy Statement 10/328 in relation to this principle, it is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	22.1	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.	An FMI should use, or at a minimum accommodate, internationally accepted communication procedures and standards.	CMB Policy Statement No.10/328	Partly consistent	CMB is recommended to ensure implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	23.0	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.		CMB Policy Statement No.10/328	Partly consistent	Given that CMB Policy Statement 10/328 is the only implementation measure for certain Principles and/or KCs and the lack of supervisory evidence that would help the AT to understand the application of CMB Policy Statement 10/328, it is recommended that the CMB ensures the implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	23.1	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.	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.	CMB Policy Statement No.10/328	Partly consistent	CMB is recommended to ensure implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
CSD	23.2	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.	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.	CMB Policy Statement No.10/328	Partly consistent	CMB is recommended to ensure implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	23.3	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.	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.	CMB Policy Statement No.10/328	Partly consistent	CMB is recommended to ensure implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	23.4	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.	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.	CMB Policy Statement No.10/328	Partly consistent	CMB is recommended to ensure implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.
CSD	23.5	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.	An FMI should complete regularly and disclose publicly responses to the CPSS-IOSCO Disclosure framework for financial market infrastructures. An FMI also should, at a minimum, disclose basic data on transaction volumes and values.	CMB Policy Statement No.10/328	Partly consistent	CMB is recommended to ensure implementation of CMB Policy Statement 10/328 by developing a clear and comprehensive oversight framework allowing the CMB to assess supervised FMIs against PFMIs and induce change supporting PFMI implementation.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	1.0	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.		Law on Payment and Securities Settlement Systems, Payment Services and Electronic Money Institutions No 6493 -Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	The Law on Payment and Securities Settlement Systems, Payment Services and Electronic Money Institutions (Law No 6493) and secondary regulations, such as Regulation on Oversight of Payment and Securities Settlement Systems, Regulation on Operations of Payment and Securities Settlement systems, the Communiqué on Information Systems used in Payment and Securities Settlement Systems and the Oversight framework for payment and securities settlement systems provide a clear legal basis for oversight, regulation and supervision of payment systems by CBRT. The payment systems law provides for various powers of the CBRT to regulate and supervise such institutions, including, among others, the granting of operating licences to the system operator, termination of operating licences, oversight powers of CBRT over such systems, netting of transfer orders, collateral management, powers to make secondary legislation, the imposition of penalties for violations of directions and regulations etc. The two Regulations broadly cover all the important activities of the payment system operators.
PS	1.1	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	The legal basis should provide a high degree of certainty for each material aspect of an FMI's activities in all relevant jurisdictions.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	1.2	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	An FMI should have rules, procedures, and contracts that are clear, understandable, and consistent with relevant laws and regulations.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	1.3	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	1.4	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	Currently there are no cross-border operations. The CBRT as regulator and overseer to ensure consistently applying the KC as and when such a decision for cross-border operations is taken.
PS	1.5	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	An FMI conducting business in multiple jurisdictions should identify and mitigate the risks arising from any potential conflict of laws across jurisdictions.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	Currently there are no cross-border operations. The CBRT as regulator and overseer to ensure consistently applying the KC as and when such decision for cross-border operations is taken.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	2.0	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.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	The Objectives and policies of the CBRT regarding payment systems, which is the overarching policy document, and the Oversight framework for payment and SSS mandate the payment systems to ensure that the systems are operated in compliance with the PFMIs. The Objectives and policies of the CBRT regarding payment systems provides that the CBRT's main objective regarding payment and securities settlement systems and its oversight activities, is to ensure the safe, uninterrupted, efficient and effective functioning of the systems.
PS	2.1	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	2.2	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	2.3	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.	The roles and responsibilities of an FMI’s board of directors (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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	2.4	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.	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).	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	2.5	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	2.6	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	The CBRT may consider implementing measures to address the gaps about inclusion of information relating to the specific contents of policies/guidance issued by CBRT providing detailed information about requirements of a risk management framework, such as providing for risk appetite/risk tolerance policies, roles and responsibilities of the Board and other risk committees and senior management, risk management models, internal audit control functions etc.
PS	2.7	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	3.0	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	The gaps or shortcomings identified have no material impact on completeness or consistency.
PS	3.1	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	The CBRT may consider implementing measures to address gaps pertaining to specifying the frequency of review of the risk management framework.
PS	3.2	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	An FMI should provide incentives to participants and, where relevant, their customers to manage and contain the risks they pose to the FMI.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	3.3	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	3.4	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	Though the critical payment systems are presently being operated by CBRT, the CBRT may consider the implementing measures in general as part of the policy including addressing gaps in requiring identification by the system operators of scenarios that may potentially prevent them providing their critical operations as a going concern and preparation for an orderly wind-down.
PS	4.0	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 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.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	4.1	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 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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	4.2	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 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.	An FMI should identify sources of credit risk, routinely measure and monitor credit exposures, and use appropriate risk-management tools to control these risks.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	4.3	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 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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	4.7	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 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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	5.0	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.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	The gaps or shortcomings identified have no material impact on completeness or consistency.
PS	5.1	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.	An FMI should generally limit the assets it (routinely) accepts as collateral to those with low credit, liquidity, and market risks.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	5.2	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.	An FMI should establish prudent valuation practices and develop haircuts that are regularly tested and take into account stressed market conditions.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	The CBRT may consider implementing measures to address gaps pertaining to regular testing and consideration of stressed market conditions for haircut rates.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	5.3	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	The CBRT may consider implementing measures to address gaps pertaining to the application of conservative haircuts which are calibrated to include periods of stressed market conditions.
PS	5.4	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	Although the critical payment systems are being operated by the CBRT, as part of forward-looking future scenarios and changes, the CBRT may consider implementing measures to address gaps pertaining to the acceptance of eligible collateral and the avoidance of concentrated holdings of illiquid assets as collateral.
PS	5.5	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	The CBRT may consider addressing the gap in the implementation of measures pertaining to risks associated with the acceptance of cross-border collateral and its usage in a timely manner. This is to plan for any eventuality and circumstances in which cross-border collaterals would be accepted.
PS	5.6	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.	An FMI should use a collateral management system that is well-designed and operationally flexible.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	7.0	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.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	The gaps or shortcomings identified have no material impact on completeness or consistency.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	7.1	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	7.2	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	7.3	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	7.5	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	7.6	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	7.7	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	The CBRT may consider implementing measures to address gaps pertaining to regular testing of FMIs' procedures for accessing its liquid resources from a liquidity provider.
PS	7.8	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	7.9	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	7.10	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	8.0	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.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems -Law On Payment And Securities Settlement Systems, Payment Services and Electronic Money Institutions	Consistent	The CBRT may consider implementing measures to address gaps pertaining to the provision of final settlement intraday or in real time.
PS	8.1	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.	An FMI's rules and procedures should clearly define the point at which settlement is final.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems -Law On Payment And Securities Settlement Systems, Payment Services and Electronic Money Institutions	Consistent	
PS	8.2	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	8.3	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.	An FMI should clearly define the point after which unsettled payments, transfer instructions, or other obligations may not be revoked by a participant.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	9.0	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 risk arising from the use of commercial bank money.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	9.1	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 risk arising from the use of commercial bank money.	An FMI should conduct its money settlements in central bank money, where practical and available, to avoid credit and liquidity risks.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	9.2	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 risk arising from the use of commercial bank money.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	9.3	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 risk arising from the use of commercial bank money.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	9.4	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 risk arising from the use of commercial bank money.	If an FMI conducts money settlements on its own books, it should minimise and strictly control its credit and liquidity risks.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	9.5	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 risk arising from the use of commercial bank money.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	12.0	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.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	The CBRT may consider implementing measures to address gaps pertaining to settlement risk arising from two interlinked obligations.
PS	12.1	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	The CBRT may consider implementing measures to address gaps pertaining to settlement risk arising from two interlinked obligations.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	13.0	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.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	13.1	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	13.2	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.	An FMI should be well prepared to implement its default rules and procedures, including any appropriate discretionary procedures provided for in its rules.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	13.3	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.	An FMI should publicly disclose key aspects of its default rules and procedures.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	13.4	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	15.0	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.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	The gaps or shortcomings identified have no material impact on completeness or consistency.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	15.1	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	15.2	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	15.3	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	15.4	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	15.5	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.	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 board of directors and updated regularly.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	Though the Regulation on Operations of Payment and Securities Settlement Systems provide for the preparation of a recovery plan by the FMI, the CBRT may consider implementing measures to address gaps pertaining to the prescription of broad details about the structure of recovery plan and/or living will or orderly wind down document. We advise a forward-looking approach as the area of payments change quickly due to both advancements in technology and policy developments. The current framework applies to CBRT. If/when the situation changes in the future, the framework may not be adequate. That may be relevant as there may be a need to assess other payment systems not managed by the CBRT.
PS	16.0	An FMI should safeguard its own and its participants' assets and minimise 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.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	16.1	An FMI should safeguard its own and its participants' assets and minimise 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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	16.2	An FMI should safeguard its own and its participants' assets and minimise 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.	An FMI should have prompt access to its assets and the assets provided by participants, when required.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	16.3	An FMI should safeguard its own and its participants' assets and minimise 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.	An FMI should evaluate and understand its exposures to its custodian banks, taking into account the full scope of its relationships with each.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	16.4	An FMI should safeguard its own and its participants' assets and minimise 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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	17.0	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.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	17.1	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.	An FMI should establish a robust operational risk-management framework with appropriate systems, policies, procedures, and controls to identify, monitor, and manage operational risks.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	17.2	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.	An FMI's board of directors 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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	17.3	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.	An FMI should have clearly defined operational reliability objectives and should have policies in place that are designed to achieve those objectives.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	17.4	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.	An FMI should ensure that it has scalable capacity adequate to handle increasing stress volumes and to achieve its service-level objectives.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	17.5	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.	An FMI should have comprehensive physical and information security policies that address all potential vulnerabilities and threats.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	17.6	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	17.7	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	18.0	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	18.1	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	18.2	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.	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 endeavour to set requirements that have the least-restrictive impact on access that circumstances permit.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	18.3	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	19.0	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	Though the Regulation on Operations of Payment and Securities Settlement Systems provide for the determination of rules of participation in the system, the CBRT may consider implementing measures to address gaps pertaining to participation of indirect members in the system.
PS	19.1	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	Though the Regulation on Operations of Payment and Securities Settlement Systems provide for the determination of rules of participation in the system, the CBRT may consider implementing measures to address gaps pertaining to participation of indirect members in the system.
PS	19.2	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	An FMI should identify material dependencies between direct and indirect participants that might affect the FMI.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	At the moment there are no indirect participants in the system. However, to the extent the payments landscape changes, the CBRT is advised to take into consideration of future requirements of providing access to indirect participants, FMIs, whatsoever. Therefore, the CBRT may consider reviewing and take adequate measures to address this.
PS	19.3	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	At the moment there are no indirect participants in the system. However, to the extent the payments landscape changes, the CBRT is advised to take into consideration of future requirements of providing access to indirect participants, FMIs, whatsoever. Therefore, the CBRT may consider reviewing and take adequate measures to address this.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	19.4	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	An FMI should regularly review risks arising from tiered participation arrangements and should take mitigating action when appropriate.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	21.0	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	The gaps or shortcomings identified have no material impact on completeness or consistency.
PS	21.1	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	Though the Regulation on Operations of Payment and Securities Settlement Systems provide for determination of rules of participation in the system, the CBRT may consider implementing measures to address gaps pertaining to participation of indirect members in the system.
PS	21.2	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	21.3	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.	An FMI should have established mechanisms for the regular review of its efficiency and effectiveness.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Oversight Of Payment And Securities Settlement Systems	Consistent	
PS	22.0	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.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
PS	22.1	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.	An FMI should use, or at a minimum accommodate, internationally accepted communication procedures and standards.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	23.0	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.		Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems --Law On Payment And Securities Settlement Systems, Payment Services and Electronic Money Institutions	Consistent	The gaps or shortcomings identified have no material impact on completeness or consistency.
PS	23.1	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	23.2	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Law On Payment And Securities Settlement Systems, Payment Services and Electronic Money Institutions -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
PS	23.3	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	Though the Regulation on Operations of Payment and Securities Settlement Systems provide for disclosure of the related system rules and procedures to the participants before the system contract is concluded between them, the CBRT may consider implementing measures to address gaps pertaining to the provision of training to system participants about the FMI's rules and procedures.
PS	23.4	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.	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.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems -Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	Though the Regulation on Operations of Payment and Securities Settlement Systems provide for public disclosure of pricing principles by an FMI, the CBRT may consider implementing measures to address gaps pertaining to disclosure of fees and discounts, if any, at the level of individual services an FMI offers.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
PS	23.5	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.	An FMI should complete regularly and disclose publicly responses to the CPSS-IOSCO Disclosure framework for financial market infrastructures. An FMI also should, at a minimum, disclose basic data on transaction volumes and values.	Oversight Framework for Payment and Securities Settlement Systems -Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	1.0	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	Article 6 of the Public Finance and Debt Management Act, empowers the undersecretary of the Treasury to conclude with the CBRT, the means and process for dematerialisation and rematerialisation of public debt securities. Accordingly, there has been a decision by the Undersecretary under which all government securities have been dematerialised. It is recommended that the CBRT appropriately make public the relevant provisions/agreements under which the CSD is operated by the CBRT. The CBRT Policy Statement on Objectives and policies of the CBRT regarding payment systems and Oversight framework for payment and securities settlement systems to be appropriately amended to include the CSD within the regulatory and oversight framework of CBRT.
SSS	1.1	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	The legal basis should provide a high degree of certainty for each material aspect of an FMI's activities in all relevant jurisdictions.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	The authorities are recommended to appropriately make public the relevant provisions/agreements under which the CSD is operated by the CBRT.
SSS	1.2	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	An FMI should have rules, procedures, and contracts that are clear, understandable, and consistent with relevant laws and regulations.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	The authorities are recommended to appropriately make public the relevant provisions/agreements under which the CSD is operated by the CBRT.
SSS	1.3	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	The authorities are recommended to appropriately make public the relevant provisions/agreements under which the CSD is operated by the CBRT.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	1.4	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	The authorities are recommended to appropriately make public the relevant provisions/agreements under which the CSD is operated by the CBRT.
SSS	1.5	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	An FMI conducting business in multiple jurisdictions should identify and mitigate the risks arising from any potential conflict of laws across jurisdictions.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	The authorities are recommended to appropriately make public the relevant provisions/agreements under which the CSD is operated by the CBRT.
SSS	2.0	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.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	2.1	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	2.2	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	2.3	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.	The roles and responsibilities of an FMI's board of directors (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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	2.4	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.	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).	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	2.5	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
SSS	2.6	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
SSS	2.7	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	3.0	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
SSS	3.1	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	3.2	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	An FMI should provide incentives to participants and, where relevant, their customers to manage and contain the risks they pose to the FMI.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	3.3	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
SSS	3.4	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	4.0	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 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.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	4.1	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 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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	4.2	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 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.	An FMI should identify sources of credit risk, routinely measure and monitor credit exposures, and use appropriate risk-management tools to control these risks.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	4.3	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 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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	4.7	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 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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	5.0	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.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	5.1	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.	An FMI should generally limit the assets it (routinely) accepts as collateral to those with low credit, liquidity, and market risks.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	5.2	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.	An FMI should establish prudent valuation practices and develop haircuts that are regularly tested and take into account stressed market conditions.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	5.3	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	5.4	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	5.5	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	5.6	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.	An FMI should use a collateral management system that is well-designed and operationally flexible.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	7.0	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.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	7.1	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	7.2	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	7.3	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	7.5	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	7.6	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	7.7	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	7.8	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	7.9	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs.
SSS	7.10	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	8.0	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.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems -Law On Payment And Securities Settlement Systems, Payment Services and Electronic Money Institutions	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	8.1	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.	An FMI's rules and procedures should clearly define the point at which settlement is final.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems -Law On Payment And Securities Settlement Systems, Payment Services and Electronic Money Institutions	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	8.2	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	8.3	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.	An FMI should clearly define the point after which unsettled payments, transfer instructions, or other obligations may not be revoked by a participant.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs.
SSS	9.0	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 risk arising from the use of commercial bank money.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	9.1	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 risk arising from the use of commercial bank money.	An FMI should conduct its money settlements in central bank money, where practical and available, to avoid credit and liquidity risks.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	9.2	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 risk arising from the use of commercial bank money.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	9.3	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 risk arising from the use of commercial bank money.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	9.4	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 risk arising from the use of commercial bank money.	If an FMI conducts money settlements on its own books, it should minimise and strictly control its credit and liquidity risks.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	9.5	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 risk arising from the use of commercial bank money.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs
SSS	10.0	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.		NOT APPLICABLE	Not applicable	NOT APPLICABLE In ESTS, securities are dematerialised and processed in book-entry form

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	10.1	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.	An FMI's rules should clearly state its obligations with respect to the delivery of physical instruments or commodities.	NOT APPLICABLE	Not applicable	NOT APPLICABLE In ESTS, securities are dematerialised and processed in book-entry form
SSS	10.2	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.	An FMI should identify, monitor, and manage the risks and costs associated with the storage and delivery of physical instruments or commodities.	NOT APPLICABLE	Not applicable	NOT APPLICABLE In ESTS, securities are dematerialised and processed in book-entry form
SSS	12.0	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.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs.
SSS	12.1	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	NOT APPLICABLE for CSDs according to Annex E of PFMIs.
SSS	13.0	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.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	13.1	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	13.2	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.	An FMI should be well prepared to implement its default rules and procedures, including any appropriate discretionary procedures provided for in its rules.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	13.3	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.	An FMI should publicly disclose key aspects of its default rules and procedures.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	13.4	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	15.0	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.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
SSS	15.1	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	15.2	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	15.3	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
SSS	15.4	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	15.5	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.	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 board of directors and updated regularly.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	16.0	An FMI should safeguard its own and its participants' assets and minimise 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.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	16.1	An FMI should safeguard its own and its participants' assets and minimise 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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	16.2	An FMI should safeguard its own and its participants' assets and minimise 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.	An FMI should have prompt access to its assets and the assets provided by participants, when required.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	16.3	An FMI should safeguard its own and its participants' assets and minimise 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.	An FMI should evaluate and understand its exposures to its custodian banks, taking into account the full scope of its relationships with each.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	16.4	An FMI should safeguard its own and its participants' assets and minimise 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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	17.0	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.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	17.1	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.	An FMI should establish a robust operational risk-management framework with appropriate systems, policies, procedures, and controls to identify, monitor, and manage operational risks.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
SSS	17.2	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.	An FMI's board of directors 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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	17.3	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.	An FMI should have clearly defined operational reliability objectives and should have policies in place that are designed to achieve those objectives.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	17.4	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.	An FMI should ensure that it has scalable capacity adequate to handle increasing stress volumes and to achieve its service-level objectives.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	17.5	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.	An FMI should have comprehensive physical and information security policies that address all potential vulnerabilities and threats.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	17.6	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	17.7	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	18.0	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
SSS	18.1	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
SSS	18.2	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.	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 endeavour to set requirements that have the least-restrictive impact on access that circumstances permit.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	18.3	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	19.0	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	19.1	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	19.2	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	An FMI should identify material dependencies between direct and indirect participants that might affect the FMI.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	19.3	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	19.4	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	An FMI should regularly review risks arising from tiered participation arrangements and should take mitigating action when appropriate.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
SSS	20.0	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	This Principle has been examined as applicable to CSD as per footnote 155 of the PFMI. Article 6 of the Public Finance and Debt Management Act, empowers the Undersecretary of the Treasury to conclude with the CBRT, the means and process for dematerialisation and rematerialisation of public debt securities. There was accordingly a decision by the undersecretary, as a result of which all government securities are dematerialised. Recommendations The authorities are recommended to appropriately make public the relevant provisions/agreements under which the CSD is operated by the CBRT. The CBRT Policy Statement on Objectives and policies of the CBRT regarding payment systems and Oversight framework for payment and securities settlement systems to be appropriately amended to cover the CSD under the regulatory and oversight framework of CBRT.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	20.1	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	The authorities are recommended to appropriately make public the relevant provisions/agreements under which the CSD is operated by the CBRT.
SSS	20.2	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	The authorities are recommended to appropriately make public the relevant provisions/agreements under which the CSD is operated by the CBRT.
SSS	20.3	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	The authorities are recommended to appropriately make public the relevant provisions/agreements under which the CSD is operated by the CBRT.
SSS	20.4	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	The authorities are recommended to appropriately make public the relevant provisions/agreements under which the CSD is operated by the CBRT.
SSS	20.5	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Not applicable	
SSS	20.6	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Not applicable	
SSS	21.0	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	21.1	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	21.2	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	21.3	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.	An FMI should have established mechanisms for the regular review of its efficiency and effectiveness.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Oversight Of Payment And Securities Settlement Systems	Consistent	
SSS	22.0	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.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	22.1	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.	An FMI should use, or at a minimum accommodate, internationally accepted communication procedures and standards.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	23.0	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.		Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems --Law On Payment And Securities Settlement Systems, Payment Services and Electronic Money Institutions	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
SSS	23.1	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems --Law On Payment And Securities Settlement Systems, Payment Services and Electronic Money Institutions	Consistent	
SSS	23.2	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems -Law On Payment And Securities Settlement Systems, Payment Services and Electronic Money Institutions Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
SSS	23.3	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	
SSS	23.4	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.	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.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems Regulation On Operations Of Payment and Securities Settlement Systems	Consistent	
SSS	23.5	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.	An FMI should complete regularly and disclose publicly responses to the CPSS-IOSCO Disclosure framework for financial market infrastructures. An FMI also should, at a minimum, disclose basic data on transaction volumes and values.	Oversight Framework for Payment and Securities Settlement Systems Objectives and Policies of the CBRT Regarding Payment Systems	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
TR	1.0	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.		CMB Decision No. 10/328 (23 March 2016) (also referred to as “CMB Policy Statement No.10/328”) Capital Markets Law (CML) No. 6362 CMB Regulation on the Operation, Conduct and Audit Principles of the Trade Repository (CMB TR Regulation) CMB Communique on Principles Regarding Reporting to Trade Repository (CMB TR Communique)	Consistent	The CMB may consider the measure that is mentioned under KC 2.
TR	1.1	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	The legal basis should provide a high degree of certainty for each material aspect of an FMI’s activities in all relevant jurisdictions.	CMB Board Decision (Policy Statement) no.10/328 Capital Markets Law (CML) No. 6362, Article No: 87 (2) "Trade Repositories" CMB Regulation on the Operation, Conduct And Audit Principles of the Trade Repository (CMB TR Regulation) - Article No: 6 "The duties and Powers of TRs" - Article No:5 (6-7) "Operation Terms of establishment and operation of TRs" CMB Communique on Principles Regarding Reporting to Trade Repository (CMB TR Communique), ARTICLE 6 - (1)	Consistent	
TR	1.2	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	An FMI should have rules, procedures, and contracts that are clear, understandable, and consistent with relevant laws and regulations.	CMB Board Decision (Policy Statement) no.10/328 CML Article No: 87 CMB Regulation on the Operation, Conduct And Audit Principles of the Trade Repository (CMB TR Regulation) - ARTICLES 5 (1)-(3-a) AND Article 7 CMB Communique on Principles Regarding Reporting to Trade Repository (CMB TR Communique) - ARTICLE 6 Regulation on Preparing Legislation Article 4	Consistent	Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under the CMB’s supervision to pay due care and diligence in complying with the PFMI, the Capital Markets Board may consider implementing measures to address gaps pertaining to explicit provision of framing and formulation of rules, procedures and contracts that are clear, understandable and consistent with relevant laws and regulations.
TR	1.3	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	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.	Capital Markets Law (CML), Article No: 87 CMB Board Decision (Policy Statement) no.10/328 CMB Communique on Principles Regarding Reporting to Trade Repository (CMB TR Communique), Articles 5, 8 and 9 CMB TR Regulation, Article 7 (1-i)	Consistent	
TR	1.4	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	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.	Not Applicable	Not applicable	Presently TR performs its operations only within the geographical borders of Turkey and does not perform any functions in foreign jurisdictions. As such, this KC is not applicable at present.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
TR	1.5	An FMI should have a well-founded, clear, transparent, and enforceable legal basis for each material aspect of its activities in all relevant jurisdictions.	An FMI conducting business in multiple jurisdictions should identify and mitigate the risks arising from any potential conflict of laws across jurisdictions.	Not Applicable	Not applicable	Presently TR performs its operations only within the geographical borders of Turkey and does not perform any functions in foreign jurisdictions. As such, this KC is not applicable at present.
TR	2.0	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.		CMB Board Decision (Policy Statement) no.10/328 CML CMB TR Regulation CMB Communiqué on Information Security Management System CMB Communique on Corporate Governance	Consistent	The CMB may consider the measure that is mentioned under KC 7.
TR	2.1	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.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation Article No:6 "The Duties and Powers of TRs" Article No:7 "Operation rules and principles" ARTICLE 5 (3) (C) CMB Communiqué on Information Security Management System, - Article No:5	Consistent	
TR	2.2	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.	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.	CMB Board Decision (Policy Statement) no.10/328 CML Article No:17 (1) - Corporate Governance Principles Article No:36 (2) "Common provisions" CMB COMMUNIQUE ON CORPORATE GOVERNANCE - ARTICLE 1; ANNEX 1 OF COMMUNIQUE ARTICLE 4.1, 4.2, 4.5, 2.1 AND 2.2 . CMB TR Regulation Article No:7 (1-h-i)	Consistent	
TR	2.3	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.	The roles and responsibilities of an FMI's board of directors (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.	CMB Board Decision (Policy Statement) no.10/328 CML Article No:17 (1) II-17.1 CMB Communiqué on Corporate Governance - ARTICLE 1; ANNEX 1 OF COMMUNIQUE ARTICLE 4.1, 4.2, 4.5, 2.1 AND 2.2.	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
TR	2.4	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.	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).	CMB Board Decision (Policy Statement) no.10/328 CML Article No:17 (1)- CMB Communiqué on Corporate Governance ARTICLE 1; ANNEX 1 OF COMMUNIQUE ARTICLE 4.1, 4.2, 4.3, 4.5, 2.1 AND 2.2	Consistent	
TR	2.5	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.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation ARTICLE 5 (3) (b) ÖPERATION TERMS OF ESTAB - Article No:8 "Organization and staff" Article No:9 "Confidentiality obligation" Article No:10 "Prohibitions"	Consistent	
TR	2.6	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.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation Article No:5 (3-b) and 5(9) "Operation Terms of establishment and operation of TRs" CML Article No:17 (1) II-17.1 CMB Communiqué on Corporate Governance - ARTICLE 1; ANNEX 1 OF COMMUNIQUE ARTICLE 4.1, 4.2, 4.5.1, 4.5.12	Consistent	
TR	2.7	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.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation Article No: 7 "Operation rules and principles" CMB Communiqué on Corporate Governance (II-17.1) – Annex 1 - Principles of corporate governance 3.2 "Stakeholders"	Broadly consistent	Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under the CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address gaps pertaining to consideration of interests of direct and indirect participants in the TR's design, rules, overall strategy and major decisions.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
TR	3.0	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.		CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation CMB TR Communiqué CMB Communiqué on Information Systems Management (VII-128.9) CMB Communiqué on Independent Audit of Information Systems (III-62.2)	Partly consistent	The implementation measures only provide for having risk management systems established by TRs, but do not seem to cover the review of material risks and the development of appropriate risk management tool by the TRs for risks which they pose to other entities and also which arise due to interdependencies. The implementation measures do not provide for the preparation of a recovery plan or wind-down plan by TRs indicating the potential scenarios preventing them continuing as a going concern and the options available for their recovery. The CMB may consider implementing measures to address gaps pertaining to review of material risks born by TRs, for risks which they pose to other entities as a result of interdependencies and develop appropriate risk management tools to address these risks. The CMB may also consider requiring TRs to identify scenarios that may potentially prevent them from being able to provide their critical operations and services as a going concern, and accordingly prepare a recovery and resolution plan.
TR	3.1	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	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.	CMB Board Decision (Policy Statement) no.10/328 . CMB TR Regulation Article No:5 (3-b)"Operation Terms of establishment and operation of TRs" CMB Communiqué on Information Systems Management (VII-128.9) Article No:8 "Information Systems Risk Management" Article No:9 "Establishment and Management of Information Systems Controls" CMB Communiqué on Independent Audit of Information Systems (III-62.2) - Article No:30 (1) "Obligations and Exemptions"	Consistent	
TR	3.2	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	An FMI should provide incentives to participants and, where relevant, their customers to manage and contain the risks they pose to the FMI.	CMB Board Decision (Policy Statement) no.10/328. CMB TR Regulation Article No: 13 (1), Article No:15 CMB TR Communiqué, Article No:9	Partly consistent	Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under the CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address gaps pertaining to providing incentives by TRs to its participants and their customers to manage and contain the risks they pose to the TR.
TR	3.3	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	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.	CMB Board Decision (Policy Statement) no.10/328 . CMB TR Regulation - ARTICLE 5 (3) (b)	Partly consistent	Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address gaps pertaining to review of material risks born by TRs, which it poses to other entities as a result of interdependencies and develop appropriate risk management tools to address these risks.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
TR	3.4	An FMI should have a sound risk-management framework for comprehensively managing legal, credit, liquidity, operational, and other risks.	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.	CMB Board Decision (Policy Statement) no.10/328.	Partly consistent	The implementation measures do not cover the formulation of a recovery plan and/or wind-down plan or a resolution plan by TRs. Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address gaps pertaining to mandating TRs to identify scenarios that may potentially prevent it from being able to provide its critical operations and services as a going concern and accordingly prepare a recovery and resolution plan.
TR	15.0	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.		CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation	Partly consistent	The implementation measures only provide for having risk management systems established by TRs, but do not explicitly focus on the types of risks that the TRs should identify, monitor and manage – including general business risks, losses arising from poor execution of business strategy, and unexpected and excessively large operating expenses. The implementation measures do not provide for holding liquid net assets funded by equity for continuing its operations on a going-concern basis, which should also be factored into the preparation of a recovery plan. The CMB may consider implementing measures to address gaps pertaining to identification, monitoring and management of various types of risks by the TRs, including general business risks, losses arising from poor execution of business strategy, and unexpected and excessively large operating expenses. The CMB may also consider addressing gaps pertaining to holding liquid net assets funded by equity by TRs for continuing its operations on a going-concern basis, which should also be factored into the preparation of a recovery plan.
TR	15.1	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.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation Article No: 5 (3) (b-c) and Article 7(1-a)	Partly consistent	Though the CMB TR Regulation requires TRs to establish internal controls and risk management systems and ensure its operability, there is no provision about the requirements of TRs in respect of the identification, monitoring and management of general business risks, losses from poor execution of business strategy or large operating expenses. Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under the supervision of the CMB to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above gaps pertaining to the management of general business risks.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
TR	15.2	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.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation Article No:5 (1) (c-d), 3 (a-b), Article No:7 (1) (a, f)	Partly consistent	The implementation measures do not require TRs to hold liquid net assets funded by equity (such as common stock, disclosed reserves or other retained earnings) so that they can continue operations and services as a going concern if it incurs general business losses. Although the CMB Policy Statement No 10/328 provides a general requirement for FMIs under the CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above gaps.
TR	15.3	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.	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.	CMB Board Decision (Policy Statement) no.10/328	Partly consistent	The implementation measures do not provide for putting in place a recovery plan and wind-down plan by the TRs and also to hold sufficient liquid net assets equivalent to six months of operating expenses. Although the CMB Policy Statement No 10/328 provides a general requirement for FMIs under the CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above gaps pertaining to recovery plans and wind-down plans by TRs.
TR	15.4	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.	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.	CMB Board Decision (Policy Statement) no.10/328	Partly consistent	The implementation measures do not require TRs to have high quality liquid assets so as to cover general business risks under a range of scenarios including adverse market conditions. Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above gaps.
TR	15.5	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.	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 board of directors and updated regularly.	CMB Board Decision (Policy Statement) no.10/328	Partly consistent	The implementation measures do not provide for maintaining a viable plan by the TRs for raising additional equity in case of possible reduction in its equity to or below the amount needed. Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under the CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above gaps.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
TR	17.0	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.		CMB Board Decision (Policy Statement) no.10/328 CML CMB TR Regulation CMB Communiqué on Information Systems Management (VII-128.9) CMB COMMUNIQUE ON CORPORATE GOVERNANCE	Broadly consistent	The implementation measures provide for putting in place a risk management system and conducting TR services in an effective, reliable and uninterrupted manner with necessary data processing systems and technological infrastructure established, and with a business continuity plan. However, those measures do not cover management of operational risk, including governance structure for operational risk. Nor do they provide for a high degree of certainty for ensuring management of risks posed by the participants of TRs and other FMIs in their operations, or risks posed by the TR to other FMIs. Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above gaps.
TR	17.1	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.	An FMI should establish a robust operational risk-management framework with appropriate systems, policies, procedures, and controls to identify, monitor, and manage operational risks.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation Article No:5 (3) (b) "Operation Terms of establishment and operation of TRs"	Broadly consistent	Article 5(3)(b) of CMB TR Regulation only mentions establishing a risk management framework by the TRs. However, the implementation measures do not provide for putting in place a robust operational risk management framework by the TRs. Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above gaps.
TR	17.2	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.	An FMI's board of directors 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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR regulation - article 5 (3) (b) CMB communique on corporate governance - principle Nos. 4.2.3, 4.2.4, 4.5.1 AND 4.5.12 OF annex 1 of communique	Broadly consistent	The implementation measures do not specifically provide for putting in place a robust operational risk management framework by the TRs, which clearly defines the roles and responsibilities for addressing operational risk. Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above gaps.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
TR	17.3	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.	An FMI should have clearly defined operational reliability objectives and should have policies in place that are designed to achieve those objectives.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation ARTICLE 5 (3) (c) "Operation Terms Of Establishment And Operation Of TRs Article No:7 "Operation rules and principles"	Consistent	
TR	17.4	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.	An FMI should ensure that it has scalable capacity adequate to handle increasing stress volumes and to achieve its service-level objectives.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulations - Article 5 (3) (c) "Operation Terms Of Establishment And Operation Of TRs"	Consistent	
TR	17.5	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.	An FMI should have comprehensive physical and information security policies that address all potential vulnerabilities and threats.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation Article No:7 (1) (a, f)"Operation rules and principles" CML - ARTICLE 128 CMB Communiqué on Information Systems Management (VII-128.9) - ARTICLE 1 AND 6	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
TR	17.6	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.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB Communiqué on Information Systems Management (VII-128.9) Article No:7 (6), Article No:26	Consistent	Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, CMB is recommended to implement measures to address the gaps pertaining to putting in place a secondary site by the TR, which should be designed for the resumption of operations of critical IT systems within two hours of a disruptive event. There should be a mechanism for testing such arrangements.
TR	17.7	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.	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.	CMB Board Decision (Policy Statement) no.10/328	Partly consistent	The implementation measures do not provide for a high degree of certainty for ensuring management of risks posed by the participants of TRs and other FMIs on its operations, as well as relating to those which are posed by the TR to other FMIs. Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above gaps.
TR	18.0	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.		CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation CMB TR Communiqué	Consistent	
TR	18.1	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation Article No: 7 (1) (g), Articles No:11-15	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
TR	18.2	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.	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 endeavour to set requirements that have the least-restrictive impact on access that circumstances permit.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation - Articles 11-15 CMB TR Communiqué Article 6 (1-2)	Consistent	
TR	18.3	An FMI should have objective, risk-based, and publicly disclosed criteria for participation, which permit fair and open access.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation Article No:7 (1-b)"Operating rules and principles", Article No: 14 "Temporary suspension or cancellation of membership" Article No:15 "Member responsibilities and operating principles" CML Article No: 81 "Central Registry Agency"	Consistent	
TR	19.0	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.		CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation	Partly consistent	It is recommended that the CMB addresses any gaps, including by having relevant rules to properly address the risks arising from tiered participation. This would complement the CMB Policy Statement that is applicable to TRs, which requires "all FMIs operating in Turkish capital markets either currently or in the future […] to pay due care and diligence in complying with CPMI-IOSCO PFMI".
TR	19.1	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR regulation - articles 11, 12, AND 13	Partly consistent	
TR	19.2	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	An FMI should identify material dependencies between direct and indirect participants that might affect the FMI.	CMB Board Decision (Policy Statement) no.10/328 CMB TR regulation - articles 11, 12, AND 13	Partly consistent	
TR	19.3	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR regulation - articles 11, 12, AND 13	Partly consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
TR	19.4	An FMI should identify, monitor, and manage the material risks to the FMI arising from tiered participation arrangements.	An FMI should regularly review risks arising from tiered participation arrangements and should take mitigating action when appropriate.	CMB Board Decision (Policy Statement) no.10/328 CMB TR regulation - articles 11, 12, AND 13	Partly consistent	
TR	20.0	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.		CMB Board Decision (Policy Statement) no.10/328	Partly consistent	The implementation measures do not provide for any instructions on assessment of interlinkages between FMIs and identification and management of link-related risks. Although the CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above-mentioned gaps.
TR	20.1	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	CMB Board Decision (Policy Statement) no.10/328	Partly consistent	The implementation measures do not provide for any instructions on assessment of interlinkages between FMIs and identification and management of link-related risks. Although the CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above-mentioned gaps.
TR	20.2	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	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.	CMB Board Decision (Policy Statement) no.10/328	Partly consistent	The implementation measures do not provide for any instructions on assessment of interlinkages between FMIs and identification and management of link-related risks. Although the CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above-mentioned gaps.
TR	20.9	An FMI that establishes a link with one or more FMIs should identify, monitor, and manage link-related risks.	A TR should carefully assess the additional operational risks related to its links to ensure the scalability and reliability of IT and related resources.	CMB Board Decision (Policy Statement) no.10/328	Partly consistent	The implementation measures do not provide for any instructions on assessment of interlinkages between FMIs and identification and management of link-related risks. Although the CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above-mentioned gaps.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
TR	21.0	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.		CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation CMB Communique On Corporate Governance	Broadly consistent	The implementation measures provide for taking for taking into account the opinions of stakeholders with respect to the significant decisions of capital market institutions, but it does not focus on meeting 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. Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above-mentioned gaps.
TR	21.1	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation Article 6 (1) (a-b), 7 (1) (a-b, g-h) CMB Communique On Corporate Governance - Principle NO. 3.2 Of Annex 1 Of Communique	Broadly consistent	The implementation measures provide for taking into account the opinions of stakeholders with respect to the significant decisions of capital market institutions, but it does not focus on meeting 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. Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above gaps.
TR	21.2	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation - Article 5 (3) (c), 6 and 7	Broadly consistent	Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above gaps pertaining to the definition of goals and objectives for TRs.
TR	21.3	An FMI should be efficient and effective in meeting the requirements of its participants and the markets it serves.	An FMI should have established mechanisms for the regular review of its efficiency and effectiveness.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation Article 5 (3) (b), 5 (3) (c) and 7	Broadly consistent	Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the gaps relating to putting in place mechanisms by TRs for reviewing their efficiency and effectiveness on a regular basis.
TR	22.0	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.		CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation CMB Communique On Corporate Governance	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
TR	22.1	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.	An FMI should use, or at a minimum accommodate, internationally accepted communication procedures and standards.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation - Articles 6 AND 7 CMB Communique On Corporate Governance - Principles No. 2.1 AND 2.2	Consistent	
TR	23.0	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.		CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation	Broadly consistent	The implementation measures require TRs to regularly disclose to the public, through TRs' websites, the prices of trade repository services, and the regulations and principles regarding the provision of services. They also require TRs to publicly disclose data relating to trade transactions. However, the implementation measures do not provide clear requirements about publishing to the public the FMI rules or the system designs, and rights and responsibilities of its participants. Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the gap relating to requirements to publish, by the TRs, the rules, system designs, and rights and responsibilities of its participants to the public.
TR	23.1	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.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation Article 6 and 7	Broadly consistent	Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the gap relating to instructing the TRs to clearly publish the TR rules for the benefit of its members and general public.
TR	23.2	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.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation - Article 7 and 15	Partly consistent	The implementation measures do not require TRs to disclose the description of the system's design and operations, or participants' rights, for the benefit of participants. Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under the CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above gaps.

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
TR	23.3	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.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation Article7	Partly consistent	The implementation measures do not require TRs to 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. Although CMB Policy Statement No 10/328 provides a general requirement for FMIs under CMB's supervision to pay due care and diligence in complying with the PFMI, the CMB may consider implementing measures to address the above gaps.
TR	23.4	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.	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.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation - Article 7	Consistent	
TR	23.5	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.	An FMI should complete regularly and disclose publicly responses to the CPSS-IOSCO Disclosure framework for financial market infrastructures. An FMI also should, at a minimum, disclose basic data on transaction volumes and values.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation Article 7	Consistent	
TR	24.0	A TR should provide timely and accurate data to relevant authorities and the public in line with their respective needs.		CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation	Consistent	
TR	24.1	A TR should provide timely and accurate data to relevant authorities and the public in line with their respective needs.	A TR should provide data in line with regulatory and industry expectations to relevant authorities and the public, respectively, that is comprehensive and at a level of detail sufficient to enhance market transparency and support other public policy objectives.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation - Articles 6, 17 & 18 & 19	Consistent	
TR	24.2	A TR should provide timely and accurate data to relevant authorities and the public in line with their respective needs.	A TR should have effective processes and procedures to provide data to relevant authorities in a timely and appropriate manner to enable them to meet their respective regulatory mandates and legal responsibilities.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation - Article 17 (3)	Consistent	

FMI Type	Principle or Type key consideration ID	Principle	Key consideration	Implementation measures	Principle rating	Assessment comments (ie key conclusions and recommendations)
TR	24.3	A TR should provide timely and accurate data to relevant authorities and the public in line with their respective needs.	A TR should have robust information systems that provide accurate current and historical data. Data should be provided in a timely manner and in a format that permits it to be easily analysed.	CMB Board Decision (Policy Statement) no.10/328 CMB TR Regulation - Articles 5 (3-a,b,c) and 6 (1-c) CMB TR Communique, Provisional Clause 1 (TR Communique)	Consistent	