

# Audit report - Financial market infrastructures

Version 11/2023

## Base data

Institut

Audit firm

Lead auditor

Start of audit year

End of audit year

Financial market infrastructure type

Level

Additional audit(s)

- Trading venue
- Central counterparty
- Central securities depository
- Trade repository
- Payment system

- Only-single-entity level
- Single-entity and consolidated level (parent company structure)
- Only group-level (holding structure /atypical structure)

Yes  No

Recipients of the report

## 1. General conditions of the audit

This section lists the general conditions for the audit in accordance with FINMA Circular 13/3.

General conditions of the audits / audit execution:

Audit scope/mandate, general audit procedure

Confirmation that no particular difficulties were encountered during the conduct of the audit.

Yes  No

e.g. absence of parties responsible for making decisions

Explanation:

Confirmation that the supervised entity has provided all necessary information in a timely manner and in the required quality.

Yes  No

incl. its internal audit department

Explanation:

Confirmation that the audit was conducted in accordance with the audit strategy approved by the supervisory authority.

Yes  No

Deviations from the approved audit strategy must be justified.

Explanation:

Confirmation that the work was carried out in accordance with the standard audit programmes specified by FINMA.

- Yes
- No
- n.a.

Explanation:

Period of the audit procedures

Planning from:

Planning until:

Execution of basic audit  
from:

Execution of basic audit up  
to:





Execution of additional audit from:

Execution of additional audit up to:

Designation of additional audit:




Execution of additional audit from:

Execution of additional audit up to:

Designation of additional audit:




Preparation of reporting from:

Preparation of reporting up to:



A list of the key people involved in the audit (persons with management and coordination roles as well as specialists involved in the areas of IT, taxes, valuation, etc.), including the hierarchy or function level (e.g. partners, managers, etc.).

Function	Surname / Given name	Level
<input type="text"/>	<input type="text"/>	<input type="text"/>
* Designation		* Designation
<input type="text"/>		<input type="text"/>
Function	Surname / Given name	Level
<input type="text"/>	<input type="text"/>	<input type="text"/>
* Designation		* Designation
<input type="text"/>		<input type="text"/>

Information on the use of the work of Internal Audit, of another auditor (including Group companies), of an expert, or of other third parties.

Have any works by third parties been used?

- Yes
- No

Works from	Description
<input type="text"/>	<input type="text"/>

Audit area / audit field	
Content / scope / result	
Assessment by the audit firm	
Works from	Description
Audit area / audit field	
Content / scope / result	
Assessment by the audit firm	

## 2. Independence of the audit firm

We confirm that we complied with the independence provisions of the Swiss Code of Obligations, the Auditor Oversight Act and the Auditor Oversight Ordinance, the Financial Market Auditing Ordinance and the supplementary provisions on regulatory audits with reference to the reporting year.

- Yes
- No
- n.a.

Reasons in case of "no" or "n.a.":

## 3. Other mandates of the audit firm with the supervised entity

The audit firm enumerates any other mandates with the supervised entity and with group companies that are part of the consolidated supervision.

In the period relevant to the report, we provided additional services for the audited institution and any group companies that are part of the consolidated supervision.

- Yes
- No

Other services provided
Explanation:
Other services provided

Explanation:

#### 4. Summary of audit results / irregularities and recommendations

The audit firm explains all irregularities and recommendations of the reporting year and of the preceding audit period, in each case with a deadline and measures to be taken or that have been taken, as well as the status of implementation or results of the subsequent audit with regard to restoring compliance with regulatory law (only those irregularities or recommendations shall be addressed for which the audit firm had planned its own audit procedures in accordance with the audit strategy). Irregularities are not deemed to have been settled until the subsequent audits have been completed.

The irregularities and recommendations must be classified in accordance with no. 75.2ff FINMA Circular 13/3 "Auditing".

##### 4.1 Irregularities

In accordance with our audit strategy, in our audit procedures we have found irregularities for the reporting period.

Yes  No

Designation		
<input style="width: 100%; height: 20px;" type="text"/>		
Audit area / audit field		
<input style="width: 100%; height: 20px;" type="text"/>		
Classification <input type="radio"/> low <input type="radio"/> medium <input type="radio"/> high	Status <input type="radio"/> implemented/completed <input type="radio"/> pending/partially implemented <input type="radio"/> overdue	Deadline <input style="width: 100%; height: 20px;" type="text"/>
Description, incl. measures to be taken or that have been taken, status of implementation, results of the subsequent audit, etc.		
<input style="width: 100%; height: 20px;" type="text"/>		
The supervised entity accepts the irregularity <input type="radio"/> Yes <input type="radio"/> No		Recurring irregularity <input type="radio"/> Yes <input type="radio"/> No
Statement from institution		
<input style="width: 100%; height: 20px;" type="text"/>		
Designation		
<input style="width: 100%; height: 20px;" type="text"/>		
Audit area / audit field		
<input style="width: 100%; height: 20px;" type="text"/>		
Classification <input type="radio"/> low <input type="radio"/> medium <input type="radio"/> high	Status <input type="radio"/> implemented/completed <input type="radio"/> pending/partially implemented <input type="radio"/> overdue	Deadline <input style="width: 100%; height: 20px;" type="text"/>

Description, incl. measures to be taken or that have been taken, status of implementation, results of the subsequent audit, etc.

The supervised entity accepts the irregularity

Yes  No

Recurring irregularity

Yes  No

Statement from institution

## 4.2 Recommendations

In accordance with our audit strategy, in our audit procedures we have found recommendations for the reporting period.

Yes  No

Designation

Audit area / audit field

Classification

low  
 medium  
 high

Status

implemented/completed  
 pending/partially implemented  
 overdue

Deadline

Description, incl. measures to be taken or that have been taken, status of implementation, results of the subsequent audit, etc.

The supervised entity accepts the recommendation

Yes  No

Recurring recommendation

Yes  No

Statement from institution

Designation

Audit area / audit field

Classification

low  
 medium  
 high

Status

implemented/completed  
 pending/partially implemented  
 overdue

Deadline

Description, incl. measures to be taken or that have been taken, status of implementation, results of the subsequent audit, etc.

The supervised entity accepts the recommendation

Yes  No

Recurring recommendation

Yes  No

Statement from institution

### 4.3 Irregularities mentioned in the last audit report

Irregularities were pointed out in the last audit report.

Yes  No

Mentioned for the first time in the reporting year	Designation		
<input type="text"/>	<input type="text"/>		
Audit area / audit field			
<input type="text"/>			
Classification	Status	Current deadline	The original deadline has been extended
<input type="radio"/> low <input type="radio"/> medium <input type="radio"/> high	<input type="radio"/> implemented/completed <input type="radio"/> pending/partially implemented <input type="radio"/> overdue	<input type="text"/>	<input type="radio"/> Yes <input type="radio"/> No
Description, including reason for non-implementation, measures to be taken or that have been taken, status of implementation, results of the subsequent audit, reason for any extensions of deadlines.			
<input type="text"/>			

  

Mentioned for the first time in the reporting year	Designation		
<input type="text"/>	<input type="text"/>		
Audit area / audit field			
<input type="text"/>			
Classification	Status	Current deadline	The original deadline has been extended
<input type="radio"/> low <input type="radio"/> medium <input type="radio"/> high	<input type="radio"/> implemented/completed <input type="radio"/> pending/partially implemented <input type="radio"/> overdue	<input type="text"/>	<input type="radio"/> Yes <input type="radio"/> No
Description, including reason for non-implementation, measures to be taken or that have been taken, status of implementation, results of the subsequent audit, reason for any extensions of deadlines.			
<input type="text"/>			

### 4.4 Recommendations mentioned in the last audit report

Recommendations were made in the last audit report.

Yes  No

Mentioned for the first time in the reporting year	Designation
<input type="text"/>	<input type="text"/>
Audit area / audit field	
<input type="text"/>	

Classification <input type="radio"/> low <input type="radio"/> medium <input type="radio"/> high	Status <input type="radio"/> implemented/completed <input type="radio"/> pending/partially implemented <input type="radio"/> overdue	Current deadline <input type="text"/>	The original deadline has been extended <input type="radio"/> Yes <input type="radio"/> No
Description, including reason for non-implementation, measures to be taken or that have been taken, status of implementation, results of the subsequent audit, reason for any extensions of deadlines. <input type="text"/>			

Mentioned for the first time in the reporting year <input type="text"/>	Designation <input type="text"/>
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Audit area / audit field

Classification <input type="radio"/> low <input type="radio"/> medium <input type="radio"/> high	Status <input type="radio"/> implemented/completed <input type="radio"/> pending/partially implemented <input type="radio"/> overdue	Current deadline <input type="text"/>	The original deadline has been extended <input type="radio"/> Yes <input type="radio"/> No
Description, including reason for non-implementation, measures to be taken or that have been taken, status of implementation, results of the subsequent audit, reason for any extensions of deadlines. <input type="text"/>			

#### 4.5 Confirmation of FINMA and/or SNB recommendations and rulings

The audit firm records its audit opinion on compliance here, with the recommendations and legally binding orders of FINMA valid in the reporting period, stating the depth of the audit applied.

For the reporting period there are recommendations and/or rulings of FINMA and/or SNB

Yes  No

Designation / Subject <input type="text"/>	Audit depth applied <input type="radio"/> Critical assessment <input type="radio"/> Audit <input type="radio"/> n.a.
Source / Document, date from <input type="text"/>	Were these adhered to? <input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> n.a.
Audit area / audit field <input type="text"/>	
Description <input type="text"/>	

Designation / Subject <input type="text"/>	Audit depth applied <input type="radio"/> Critical assessment <input type="radio"/> Audit <input type="radio"/> n.a.
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Source / Document, date from	Were these adhered to?
<input style="width: 95%; height: 20px;" type="text"/>	<input type="radio"/> Yes <input type="radio"/> No <input type="radio"/> n.a.
Audit area / audit field	
<input style="width: 95%; height: 20px;" type="text"/>	
Description	
<input style="width: 95%; height: 20px;" type="text"/>	

#### 4.6 Summary of further audit findings

##### 4.6.1 Audit report from the prior period

Confirmation that the board of directors or the audit committee has discussed the audit report with the lead auditor.

Yes  No

Explanation

##### 4.6.2 Material weaknesses from other mandates / services

Under this heading, the audit firm addresses any material weaknesses identified in the course of further own mandates and not in connection with audit procedures in accordance with the audit strategy (including a brief assessment of the weaknesses and any impact on the risk assessment).

There are material weaknesses identified in the other mandates under Chapter 3.

Yes  No

Mandate / Service	
<input style="width: 95%; height: 20px;" type="text"/>	
Description of mandate / service	
<input style="width: 95%; height: 20px;" type="text"/>	
Description of weakness	
<input style="width: 95%; height: 20px;" type="text"/>	
Short description/measures taken by the institution	
<input style="width: 95%; height: 20px;" type="text"/>	
Assessment by the audit firm, including any effects on risk assessment	
<input style="width: 95%; height: 20px;" type="text"/>	
Status	Deadline
<input style="width: 95%; height: 20px;" type="text"/>	<input style="width: 95%; height: 20px;" type="text"/>
Mandate / Service	
<input style="width: 95%; height: 20px;" type="text"/>	
Description of mandate / service	
<input style="width: 95%; height: 20px;" type="text"/>	

Description of weakness	
Short description/measures taken by the institution	
Assessment by the audit firm, including any effects on risk assessment	
Status	Deadline

**4.6.3 Material weaknesses raised by third parties**

Under this heading, the audit firm addresses any material weaknesses raised by third parties (including Internal Audit) which had not been adopted by the audit firm in the context of its own audit procedures as irregularities or recommendations in accordance with the audit areas in the audit strategy (including a brief assessment of the weaknesses and any effects on risk assessment).

Material weaknesses identified by third parties exist for the reporting period.

Yes  No

Third party	Designation of weakness
Short description/measures taken by the institution	
Assessment by the audit firm, including any effects on risk assessment	
Status	Deadline

Third party	Designation of weakness
Short description/measures taken by the institution	
Assessment by the audit firm, including any effects on risk assessment	
Status	Deadline

**4.7 Overall assessment of the audit firm**

**4.7.1 Guarantee of proper business conduct**

Confirmation that no findings were made in the course of the audit procedures which would call into question the assurance of proper business conduct by the governing bodies and by parties holding a qualified participation.

Yes  No

Subject

Description, incl. measures to be taken or that have been taken, status of implementation.

Are FINMA measures necessary?

Yes  No

#### **4.7.2 Licensing requirements**

Confirmation that the audit procedures did not reveal any facts that would call into question the licensing requirements.

Yes  No

Subject

Description (incl. measures to be taken or that have been taken, status of implementation, etc.)

Are FINMA measures necessary?

Yes  No

## **5. Important information on the audited institution / presentation of significant changes**

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### **5.1 Business model and customer structure**

The audit firm briefly explains the business area(s) of the supervised entity or the group, as well as the client segments and markets addressed, and any changes in these during the reporting year.

### **5.2 Group structure and ownership structure / relationships with other companies**

The audit firm briefly explains the structure of the group, the parties holding a qualified participation and significant relationships and dependencies with other companies or stakeholders (economically significant contracts, intra-group cooperation, etc.) Changes in this regard are addressed and, where applicable, their impact on the consolidated supervision assessed.

### **5.3 Operational and organisational structure**

The audit firm briefly explains the general organisation and any corresponding changes.

### **5.4 Any other significant changes at the supervised entity**

The audit firm present significant changes in the supervised entity, in particular with respect to ownership, governing bodies, business model, relationships with other entities and strategic direction. If the changes have already been explained in sufficient detail elsewhere in this report, the audit firm may limit itself in the following the mentioning the change and providing a reference to the corresponding item.

### **5.5 Future challenges**

The audit firm briefly explains any future challenges for the supervised entity (institution-specific) - if not already listed in this report.

## 6. Audit results - Trading venue

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### 6.1 Minimum capital, capital adequacy and risk diversification

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had the minimum capital required.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.2 Trading: self-regulation and supervision

Intervention

- Audit
- Critical Assessment
- None

Confirmation that the supervised entity had an independent appropriate regulatory and supervisory organisation in place commensurate with its operations.

- Yes
- No
- n.a.

Confirmation that the trading supervisory body had adequate processes, controls, systems and resources in place to monitor trading in such a way as to identify and report the use of insider information, price and market manipulation as well as other legal and regulatory violations.

- Yes
- No
- n.a.

Confirmation that the persons responsible for its administration and management have a guarantee of irreproachable business conduct, enjoy a good reputation, possess the requisite professional qualifications and have been approved by FINMA.

- Yes
- No
- n.a.

Confirmation that the management body responsible for the admission of securities appropriately represents issuers and investors.

- Yes
- No
- n.a.

Confirmation that there were appropriate regulations approved by FINMA to ensure fair, orderly and transparent trading.

- Yes
- No
- n.a.

Confirmation that those bodies that fulfil the regulatory and supervisory tasks of the trading venue were independent of the business management of the trading venue.

- Yes
- No
- n.a.

Confirmation of sufficient organisational, personnel and financial resources at the self-regulatory bodies.

- Yes
- No
- n.a.

Confirmation that, as a minimum requirement, the following independent self-regulatory bodies were in place: a body that fulfils regulatory tasks, a trading supervisory body, a body responsible for the admission of securities to trading, an independent appeal body.

- Yes
- No
- n.a.

Confirmation that the collaboration between the trading supervisory bodies was appropriately regulated or organised and the data received were used for their respective tasks.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### **6.3 Trade - organisation and guarantee of orderly and transparent trading**

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has adopted organisational measures to ensure orderly and transparent trading.

- Yes
- No
- n.a.

Confirmation that the supervised entity has kept chronological records of all orders and transactions.

- Yes
- No
- n.a.

Confirmation that the supervised entity has implemented appropriate organisational measures to ensure pre-trade transparency.

- Yes
- No
- n.a.

Confirmation that the supervised entity has implemented appropriate organisational measures to ensure post-trade transparency.

- Yes
- No
- n.a.

Confirmation that the supervised entity has set transparent and fair rules and procedures for orderly trading and objective criteria for the execution of orders.

- Yes
- No
- n.a.

Confirmation that the supervised entity had effective systems, procedures and arrangements to ensure its trading facility guarantees orderly trading.

- Yes
- No
- n.a.

Confirmation of written agreements with all participants holding a special function (market-making strategy) and that systems and procedures were maintained that ensure that these participants comply with the regulations.

- Yes
- No
- n.a.

Confirmation that the supervised entity adopted appropriate organisational measures to identify, manage and monitor algorithmic trading and high-frequency trading.

- Yes
- No
- n.a.

Confirmation that the supervised entity had appropriate organisational measures in place to ensure and disclose the suspension of trading in a security.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### 6.4 Admission of participants

Intervention

- Audit
- Critical assessment
- None

Confirmation of fair and open access to services.

- Yes
- No
- n.a.

Confirmation that potential participants were subjected to an appropriate due diligence process with regard to access restrictions.

- Yes
- No
- n.a.

Confirmation of appropriate regulation governing the admission, rights, obligations and exclusion of participants.

- Yes
- No
- n.a.

Confirmation that adherence to the regulations is monitored and that contractual sanctions were imposed in the event of infringements.

- Yes
- No
- n.a.

Confirmation that instruments were provided and incentives created so that participants can continuously manage and limit the risks arising for themselves or for the financial market infrastructure.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.5 Admission of securities

Intervention

- Audit
- Critical assessment
- None

Confirmation of appropriate regulations conforming to international standards on the admission of securities to trading by a stock exchange, particularly as regards the listing of securities.

- Yes
- No
- n.a.

Confirmation of appropriate regulations on the admission of securities to trading by a multilateral trading facility.

- Yes
- No
- n.a.

Confirmation that adherence to the regulations is monitored and that contractual sanctions were imposed in the event of infringements.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.6 Specific requirements related to the provision of ancillary services

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity only operated one financial market infrastructure as a legal entity (with the exception of the operation of a multilateral trading facility by a stock exchange).

- Yes
- No
- n.a.

Confirmation of a corresponding licence or authorisation for the provision of ancillary services requiring a licence or authorisation under financial infrastructure laws and confirmation that the additional authorisation requirements were met.

- Yes
- No
- n.a.

Confirmation that FINMA's requirements were complied with for the provision of those ancillary services not contingent on any licence or authorisation under financial infrastructure laws.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.7 Other risks from the legal, litigation and compliance area

Intervention

- Audit
- Critical assessment
- None

Confirmation that the legal, litigation and compliance area applied appropriate methods/processes to identify, measure, manage and monitor the risks and that these methods/processes were applied effectively.

- Yes
- No
- n.a.

Confirmation that appropriate requirements were contractually stipulated.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.8 General rules of conduct

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has fulfilled the requirements of the documentation and retention duties.

- Yes
- No
- n.a.

Confirmation that effective organisational measures have been implemented to identify, prevent, settle and monitor conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the supervised entity ensured the publication of essential information.

- Yes
- No
- n.a.

Confirmation that the requirements of FINMA Circular 2017/6 have been appropriately implemented.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.9 Corporate governance

Intervention

- Audit
- Critical assessment
- None

Confirmation that the requirements, principles and standards incumbent on the management body and the executive management have been complied with.

- Yes
- No
- n.a.

Confirmation that the body for governance, supervision and control sets out the basic risk management principles and determines the risk tolerance of the financial market infrastructure.

- Yes
- No
- n.a.

Confirmation that an appropriate institution-wide risk management framework has been developed and signed off.

- Yes
- No
- n.a.

Confirmation that the supervised entity had an appropriate, documented internal control system based on specifications, processes and systems.

- Yes
- No
- n.a.

Confirmation that the supervised entity has transparently disclosed the principles and structures on the basis of which the institution is directed and controlled.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### 6.10 Qualitative requirements for the management of operational risks

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has observed the qualitative requirements (principles) pertaining to the management of operational risks.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### 6.11 Risk control function

Intervention

- Audit
- Critical assessment
- None

Confirmation that the organisational set-up of this function and the incentive system did not involve any conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the independent body had sufficient resources and competencies to perform its duties and meet its responsibilities effectively and that access to the governing body or its risk committee was assured for the impartial body.

- Yes
- No
- n.a.

Confirmation that the impartial body had unrestricted information, access and inspection rights.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.12 Compliance Function

Intervention

- Audit
- Critical assessment
- None

Confirmation that the organisational set-up of this function and the incentive system did not involve any conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the independent body had sufficient resources and competencies to perform its duties and meet its responsibilities effectively and that access to the governing body or its risk committee was assured for the impartial body.

- Yes
- No
- n.a.

Confirmation that the impartial body had unrestricted information, access and inspection rights.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.13 Internal audit function

Confirmation that the supervised entity has established an internal audit function which has met the applicable subordination and organisational requirements.

- Yes
- No
- n.a.

Confirmation that the technological and personnel resources of internal audit function were adequate.

- Yes
- No
- n.a.

Confirmation that the internal audit function had the required professional competencies.

- Yes
- No
- n.a.

Confirmation that there was appropriate cooperation/coordination with the internal audit function.

- Yes
- No
- n.a.

Confirmation that access to the internal audit function's reports was guaranteed.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### 6.14 IT

Element covered	Intervention
<input style="width: 100%; height: 100%;" type="text"/>	<input type="radio"/> Audit <input type="radio"/> Critical assessment

Confirmation that the "IT" area was adequately designed (based on the knowledge of the elements covered).

- Yes
- No
- n.a.

Confirmation that the institution complied with the stricter requirements ordered by FINMA.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### 6.15 Outsourcing

Element covered	Intervention
<input style="width: 100%; height: 100%;" type="text"/>	<input type="radio"/> Audit <input type="radio"/> Critical assessment

Confirmation that the outsourcing requirements and principles have been generally met (based on the findings of the elements covered).

- Yes
- No
- n.a.

Confirmation that the requirements and principles regarding new outsourcing agreements have been met.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### 6.16 BCM (business continuity management)

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had an approved and appropriate BCM strategy.

- Yes
- No
- n.a.

Confirmation that the supervised entity had prepared an appropriate business impact analysis.

- Yes
- No
- n.a.

Confirmation that the supervised entity has determined appropriate options for the recovery of the business processes and data necessary for operations.

- Yes
- No
- n.a.

Confirmation that the supervised entity had appropriate procedures to ensure that participants' assets and positions can be transferred or settled immediately in the event of the withdrawal or return of authorisation.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### 6.17 Compliance with reporting duties

Intervention

- Audit
- Critical assessment
- None

Confirmation that appropriate organisational measures have been taken to comply with reporting duties.

- Yes
- No
- n.a.

Confirmation that reporting duties were complied with.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.18 Compliance with obligations relating to the additional operation of an organised trading facility

Intervention

- Audit
- Critical assessment
- None

Confirmation that where organised trading facilities are operated appropriate organisational measures have been taken to guarantee orderly trading and that it has been ensured that effective measures have been taken to prevent disruptions to the trading facility.

- Yes
- No
- n.a.

Confirmation that the operator of organised trading facilities ensures that client interests are comprehensively protected and has taken appropriate measures to avoid conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the organised trading facility was operated separately from the other business activities.

- Yes
- No
- n.a.

Confirmation that the operator of organised trading facilities has met trading transparency requirements.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.19 Corporate governance at group level

Confirmation that the requirements and principles pertaining to corporate governance were complied with at group level.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.20 Group functions for risk control and risk mitigation

Intervention

- Audit
- Critical assessment
- None

Confirmation that the technological and personnel resources of the compliance function were adequate and that they carried out their responsibilities effectively.

- Yes
- No
- n.a.

Confirmation that the technological and personnel resources of the risk control function were sufficient and that they carried out their responsibilities effectively.

- Yes
- No
- n.a.

Confirmation that the organisational set-up of these functions does not result in any conflict of interest.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.21 Group internal audit

Confirmation that the technological and personnel resources of internal audit function were adequate.

- Yes
- No
- n.a.

Confirmation that the internal audit function had the required professional competencies.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.22 Group-wide measures to ensure compliance with capital adequacy and risk diversification requirements

Intervention

- Audit
- Critical assessment
- None

Confirmation that adequate organisational measures have been taken to comply with capital adequacy and risk diversification requirements at group level.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.23 Intra-group financing structures and contingent liabilities

Intervention

- Audit
- Critical assessment
- None

Confirmation that intra-group positions and structures were correctly approved, contractually agreed and monitored.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.24 Compliance with capital adequacy and risk diversification requirements

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had the minimum capital required at consolidated level.

- Yes
- No
- n.a.

Confirmation that the determination and calculation of the eligible capital were carried out correctly at consolidated level.

- Yes
- No
- n.a.

Confirmation that the determination and calculation of the minimum capital adequacy requirement were carried out correctly at consolidated level.

- Yes
- No
- n.a.

Confirmation that the supervised entity complied with the minimum capital adequacy requirements in accordance with the CAO at consolidated level.

- Yes
- No
- n.a.

Confirmation that the supervised entity had a plan approved by the body for governance, supervision and control at consolidated level that sets out how further capital is to be procured if the capital no longer fulfils the requirements.

- Yes
- No
- n.a.

Confirmation that the supervised entity has maintained appropriate directives, processes, controls and reporting schedules to monitor its capital adequacy requirements at consolidated level.

- Yes
- No
- n.a.

Confirmation that the supervised entity has appropriately monitored credit risks vis-à-vis single counterparty or group of associated counterparties at consolidated level based on the calculation principles set out in the CAO.

- Yes
- No
- n.a.

Confirmation that any specific obligations related to capital adequacy or risk diversification were observed by the supervised entity at consolidated level.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.25 Compliance with consolidated reporting duties

Intervention

- Audit
- Critical assessment
- None

Confirmation that appropriate organisational measures have been taken to comply with reporting duties.

- Yes
- No
- n.a.

Confirmation that reporting duties were complied with.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.26 Supplementary elements

If there is a parent company structure: the audit firm shall specify those group companies from which the material business risks (credit, market, operational and other risks) originate and summarise how these audit areas were covered during the reporting year (if other group companies with material business risks exist in addition to the company shown at individual level).

If there is a holding or atypical structure: the audit firm shall specify those group companies from which the material business risks (credit, market, operational and other risks) originate and summarise how these audit areas were covered during the reporting year.

## 6. Audit results - Central counterparty

---

### 6.1 Minimum capital, capital adequacy and risk diversification

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had the minimum capital required.

- Yes
- No
- n.a.

Confirmation that the determination and calculation of the eligible capital were carried out correctly.

- Yes
- No
- n.a.

Confirmation that the determination and calculation of the minimum capital adequacy requirement were carried out correctly.

- Yes
- No
- n.a.

Confirmation that the disclosure requirements for qualitative and quantitative information were complied with.

- Yes
- No
- n.a.

Confirmation that the supervised entity complied with the minimum capital adequacy requirements in accordance with the CAO.

- Yes
- No
- n.a.

Confirmation that the supervised entity could access its dedicated capital (skin in the game).

- Yes
- No
- n.a.

Confirmation that the supervised entity held further capital in order to cover the costs of a voluntary cessation of business or restructuring.

- Yes
- No
- n.a.

Confirmation that the supervised entity had a plan approved by the body for governance, supervision and control that sets out how further capital is to be procured if the capital no longer fulfils the requirements.

- Yes
- No
- n.a.

Confirmation that the supervised entity has maintained appropriate directives, processes, controls and reporting schedules to monitor its capital adequacy requirements.

- Yes
- No
- n.a.

Confirmation that the supervised entity has appropriately monitored credit risks vis-à-vis single counterparty or group of associated counterparties.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.2 Liquidity

Intervention

- Audit
- Critical assessment
- None

Confirmation that the execution of the supervised entity's services and activities was guaranteed.

- Yes
- No
- n.a.

Confirmation that fulfilment of payment obligations was guaranteed.

- Yes
- No
- n.a.

Confirmation that the financial resources were held solely in cash or invested in liquid financial instruments with a low market and credit risk.

- Yes
- No
- n.a.

Confirmation that the supervised entity has performed appropriate stress tests, including accounting for the default of two participants that would trigger the largest payment obligations.

- Yes
- No
- n.a.

Confirmation that the supervised entity's investment strategy is in line with its risk management strategy and that concentration risk is adequately managed.

- Yes
- No
- n.a.

Confirmation that the supervised entity has maintained appropriate directives, processes, controls and reporting schedules to monitor its liquidity requirements.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.3 Admission of participants

Intervention

- Audit
- Critical assessment
- None

Confirmation of fair and open access to services.

- Yes
- No
- n.a.

Confirmation that potential participants were subjected to an appropriate due diligence process with regard to access restrictions.

- Yes
- No
- n.a.

Confirmation that instruments were provided and incentives created so that participants can continuously manage and limit the risks arising for themselves or for the financial market infrastructure.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.4 Admission of participants: financial conditions

Intervention

- Audit
- Critical assessment
- None

Confirmation of minimum participant creditworthiness requirements.

- Yes
- No
- n.a.

Confirmation that the participants underwent regular creditworthiness checks.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.5 Collateral and margin management: process recovery and management

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had suitable measures to ensure an appropriate composition and valuation of collateral and margins.

- Yes
- No
- n.a.

Confirmation that own collateral and assets plus the collateral and assets of participants were held with creditworthy third parties which, insofar as possible, are subject to supervision.

- Yes
- No
- n.a.

Confirmation that the supervised entity disclosed to the participant any use of the collateral provided by the participant for other purposes.

- Yes
- No
- n.a.

Confirmation that the supervised entity demanded appropriate collateral, particularly in the form of initial margins, variation margins and contributions to the default fund.

- Yes
- No
- n.a.

Confirmation of appropriate monitoring and management of current and potential credit risks (stress testing – default fund) and backtesting of initial margins.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.6 Risk models collateral and margin management incl. stress models, haircut, etc.

Intervention

- Audit
- Critical assessment
- None

Confirmation that the models and parameters on which risk management is based have been appropriately reviewed and reported.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.7 Default management process

Intervention

- Audit
- Critical assessment
- None

Confirmation that an appropriate default management process is in place.

- Yes
- No
- n.a.

Confirmation that the rules and procedures were tested at least once a year.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.8 Segregation and portability

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has ensured the contractual, legal and operational segregation and portability of assets, receivables and liabilities.

- Yes
- No
- n.a.

Confirmation, that the supervised entity has taken appropriate organisational measures to ensure that, in the event of a participant's default, collateral, receivables and obligations (positions) held by the participant on behalf of an indirect participant could be transferred to another participant indicated by the indirect participant.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.9 Settlement

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has taken appropriate organisational measures to ensure the proper and lawful settlement of securities transactions.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.10 Specific requirements related to the provision of ancillary services

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has only operated one financial market infrastructure as a legal entity.

- Yes
- No
- n.a.

Confirmation of a corresponding licence or authorisation for the provision of ancillary services requiring a licence or authorisation under financial infrastructure laws and confirmation that the additional authorisation requirements were met.

- Yes
- No
- n.a.

Confirmation that FINMA's requirements were complied with for the provision of those ancillary services not contingent on any licence or authorisation under financial infrastructure laws.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.11 Other risks from the legal, litigation and compliance area

Intervention

- Audit
- Critical assessment
- None

Confirmation that the legal, litigation and compliance area applied appropriate methods/processes to identify, measure, manage and monitor the risks and that these methods/processes were applied effectively.

- Yes
- No
- n.a.

Confirmation that appropriate requirements were contractually stipulated.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.12 General rules of conduct

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has fulfilled the requirements of the documentation and retention duties.

- Yes
- No
- n.a.

Confirmation that effective organisational measures have been implemented to identify, prevent, settle and monitor conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the supervised entity ensured the publication of essential information.

- Yes
- No
- n.a.

Confirmation that the requirements of FINMA Circular 2017/6 have been appropriately implemented.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.13 Corporate governance

Intervention

- Audit
- Critical assessment
- None

Confirmation that the requirements, principles and standards incumbent on the management body and the executive management have been complied with.

- Yes
- No
- n.a.

Confirmation that an appropriate institution-wide risk management framework has been developed and signed off.

- Yes
- No
- n.a.

Confirmation that the supervised entity had an appropriate, documented internal control system based on specifications, processes and systems.

- Yes
- No
- n.a.

Confirmation that the supervised entity has transparently disclosed the principles and structures on the basis of which the institution is directed and controlled.

- Yes
- No
- n.a.

Confirmation that the supervised entity has appointed a risk committee with representatives of the participants, of the indirect participants and members of the board.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.14 Qualitative requirements for the management of operational risks

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has observed the qualitative requirements (principles) pertaining to the management of operational risks.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

**6.15 Risk control function**

Intervention

- Audit
- Critical assessment
- None

Confirmation that the organisational set-up of this function and the incentive system did not involve any conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the impartial body had sufficient resources and competencies to perform its duties and meet its responsibilities effectively and that access to the governing body or its risk committee was assured for the impartial body.

- Yes
- No
- n.a.

Confirmation that the impartial body had unrestricted information, access and inspection rights.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

**6.16 Compliance function**

Intervention

- Audit
- Critical assessment
- None

Confirmation that the organisational set-up of this function and the incentive system did not involve any conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the impartial body had sufficient resources and competencies to perform its duties and meet its responsibilities effectively and that access to the governing body or its risk committee was assured for the impartial body.

- Yes
- No
- n.a.

Confirmation that the impartial body had unrestricted information, access and inspection rights.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.17 Internal audit function

Confirmation that the supervised entity has established an internal audit function which has met the applicable subordination and organisational requirements.

- Yes
- No
- n.a.

Confirmation that the technological and personnel resources of internal audit function were adequate.

- Yes
- No
- n.a.

Confirmation that the internal audit function had the required professional competencies.

- Yes
- No
- n.a.

Confirmation that there was appropriate cooperation/coordination with the internal audit function.

- Yes
- No
- n.a.

Confirmation that access to the internal audit function's reports was guaranteed.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.18 IT

Element covered	Intervention
<input type="text"/>	<input type="radio"/> Audit <input type="radio"/> Critical assessment

Confirmation that the "IT" area was adequately designed (based on the knowledge of the elements covered).

- Yes
- No
- n.a.

Confirmation that the institution complied with the stricter requirements ordered by FINMA.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.19 Outsourcing

Element covered	Intervention
<input type="text"/>	<input type="radio"/> Audit <input type="radio"/> Critical assessment

Confirmation that the outsourcing requirements and principles have been generally met (based on the findings of the elements covered).

- Yes
- No
- n.a.

Confirmation that the requirements and principles regarding new outsourcing agreements have been met.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.20 BCM (business continuity management)

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had an approved and appropriate BCM strategy.

- Yes
- No
- n.a.

Confirmation that the supervised entity had prepared an appropriate business impact analysis.

- Yes
- No
- n.a.

Confirmation that the supervised entity has determined appropriate options for the recovery of the business process and data necessary for operations.

- Yes
- No
- n.a.

Confirmation that the supervised entity had appropriate procedures to ensure that participants' assets and positions can be transferred or settled immediately in the event of the withdrawal or return of authorisation.

- Yes
- No
- n.a.

Confirmation that the supervised entity has procedures, capacity planning and sufficient capacity reserves in place to allow the systems to process all outstanding transactions before the close of trading in the event of a disruption.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.21 Compliance with money laundering regulations and other supervisory regulations

Intervention

- Audit
- Critical assessment
- None

Confirmation that client relationships were opened properly (incl. identification of client, determining the beneficial owner).

- Yes
- No
- n.a.

Confirmation that client relationships with PEPs were managed correctly.

- Yes
- No
- n.a.

Confirmation that client relationships with increased risks were managed correctly.

- Yes
- No
- n.a.

Confirmation that the supervised entity had appropriate systems for monitoring high-risk transactions.

- Yes
- No
- n.a.

Confirmation that high-risk transactions were managed correctly.

- Yes
- No
- n.a.

Confirmation that – based on the audit procedures performed – the other provisions of the AMLA were complied with.

- Yes
- No
- n.a.

Confirmation that – based on findings from the audit procedures performed – the provisions governing the treatment of contactless and dormant accounts were complied with.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.22 Compliance with reporting duties

Intervention

- Audit
- Critical assessment
- None

Confirmation that appropriate organisational measures have been taken to comply with reporting duties.

- Yes
- No
- n.a.

Confirmation that reporting duties were complied with.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.23 Corporate governance at group level

Confirmation that the requirements and principles pertaining to corporate governance were complied with at group level.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### 6.24 Group function for risk control and risk mitigation

Intervention

- Audit
- Critical assessment
- None

Confirmation that the technological and personnel resources of the compliance function were adequate and that it effectively carried out its responsibilities.

- Yes
- No
- n.a.

Confirmation that the technological and personnel resources of the risk control function were sufficient and that it effectively carried out its responsibilities.

- Yes
- No
- n.a.

Confirmation that the organisational arrangement of these functions does not result in any conflict of interest.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### 6.25 Group internal audit

Confirmation that the technological and personnel resources of internal audit function were adequate.

- Yes
- No
- n.a.

Confirmation that the internal audit function had the required professional competencies.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### 6.26 Group-wide measures to combat money laundering and comply with Swiss and foreign supervisory regulations

Intervention

- Audit
- Critical assessment
- None

Confirmation that appropriate organisational measures have been taken to comply with and monitor supervisory requirements in Switzerland and abroad.

- Yes
- No
- n.a.

Confirmation that all Swiss group companies have complied with Swiss anti-money laundering regulations.

- Yes
- No
- n.a.

Confirmation that foreign group companies were not used to circumvent domestic law.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.27 Group-wide liquidity management measures

Intervention

- Audit
- Critical assessment
- None

Confirmation the management of liquidity risks at group level was adequate.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.28 Group-wide measures to ensure compliance with capital adequacy and risk diversification requirements

Intervention

- Audit
- Critical assessment
- None

Confirmation that adequate organisational measures have been taken to comply with capital adequacy and risk diversification requirements at group level.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.29 Intra-group financing structures and contingent liabilities

Intervention

- Audit
- Critical assessment
- None

Confirmation that intra-group positions and structures were correctly approved, contractually agreed and monitored.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.30 Compliance with capital adequacy and risk diversification requirements

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had the minimum capital required at consolidated level.

- Yes
- No
- n.a.

Confirmation that the determination and calculation of the eligible capital were carried out correctly at consolidated level.

- Yes
- No
- n.a.

Confirmation that the determination and calculation of the minimum capital adequacy requirement were carried out correctly at consolidated level.

- Yes
- No
- n.a.

Confirmation that the supervised entity complied with the minimum capital adequacy requirements in accordance with the CAO at consolidated level.

- Yes
- No
- n.a.

Confirmation that the supervised entity had a plan approved by the body for governance, supervision and control at consolidated level that sets out how further capital is to be procured if the capital no longer fulfils the requirements.

- Yes
- No
- n.a.

Confirmation that the supervised entity has maintained appropriate directives, processes, controls and reporting schedules to monitor its capital adequacy requirements at consolidated level.

- Yes
- No
- n.a.

Confirmation that the supervised entity has appropriately monitored credit risks vis-à-vis single counterparty or group of associated counterparties at consolidated level based on the calculation principles set out in the CAO.

- Yes
- No
- n.a.

Confirmation that any specific obligations related to capital adequacy or risk diversification were observed by the supervised entity at consolidated level.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.31 Compliance with consolidated reporting duties

Intervention

- Audit
- Critical assessment
- None

Confirmation that appropriate organisational measures have been taken to comply with reporting duties.

- Yes
- No
- n.a.

Confirmation that reporting duties were complied with.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.32 Supplementary elements

If there is a parent company structure: the audit firm shall specify those group companies from which the material business risks (credit, market, operational and other risks) originate and summarise how these audit areas were covered during the reporting year (if other group companies with material business risks exist in addition to the company shown at individual level).

If there is a holding or atypical structure: the audit firm shall specify those group companies from which the material business risks (credit, market, operational and other risks) originate and summarise how these audit areas were covered during the reporting year.

## 6. Audit results - Central securities depository

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### 6.1 Minimum capital, capital adequacy and risk diversification

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had the minimum capital required.

- Yes
- No
- n.a.

Confirmation that the determination and calculation of the eligible capital were carried out correctly.

- Yes
- No
- n.a.

Confirmation that the determination and calculation of the minimum capital adequacy requirement were carried out correctly.

- Yes
- No
- n.a.

Confirmation that the disclosure requirements for qualitative and quantitative information were complied with.

- Yes
- No
- n.a.

Confirmation that the supervised entity complied with the minimum capital adequacy requirements in accordance with the CAO.

- Yes
- No
- n.a.

Confirmation that the supervised entity held further capital in order to cover the costs of a voluntary cessation of business or restructuring.

- Yes
- No
- n.a.

Confirmation that the supervised entity had a plan approved by the body for governance, supervision and control that sets out how further capital is to be procured if the capital no longer fulfils the requirements.

- Yes
- No
- n.a.

Confirmation that the supervised entity has appropriately monitored credit risks vis-à-vis single counterparty or group of associated counterparties.

- Yes
- No
- n.a.

Confirmation that the supervised entity has maintained appropriate directives, processes, controls and reporting schedules to monitor its capital adequacy requirements.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.2 Liquidity

Intervention

- Audit
- Critical assessment
- None

Confirmation that the execution of the supervised entity's services and activities was guaranteed.

- Yes
- No
- n.a.

Confirmation that the supervised entity had appropriate organisational measures to enable the settlement of payments in connection with securities held in custody or recorded with it.

- Yes
- No
- n.a.

Confirmation that the supervised entity has performed appropriate stress tests, including accounting for the default of the participant / of the two participants that would trigger the largest payment obligations.

- Yes
- No
- n.a.

Confirmation that the financial resources were held solely in cash or invested in liquid financial instruments with a low market and credit risk.

- Yes
- No
- n.a.

Confirmation that the supervised entity's investment strategy is in line with its risk management strategy and that concentration risk is adequately managed.

- Yes
- No
- n.a.

Confirmation that the supervised entity has maintained appropriate directives, processes, controls and reporting schedules to monitor its liquidity requirements.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.3 Admission of participants

Intervention

- Audit
- Critical assessment
- None

Confirmation of fair and open access to services.

- Yes
- No
- n.a.

Confirmation that potential participants were subjected to an appropriate due diligence process with regard to access restrictions.

- Yes
- No
- n.a.

Confirmation that instruments were provided and incentives created so that participants can continuously manage and limit the risks arising for themselves or for the financial market infrastructure.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.4 Admission of participants: financial conditions

Intervention

- Audit
- Critical assessment
- None

Confirmation of minimum participant creditworthiness requirements.

- Yes
- No
- n.a.

Confirmation that the participants underwent regular creditworthiness checks.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### **6.5 Collateral and margin management: process recovery and management**

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had suitable measures to ensure an appropriate composition and valuation of collateral and margins.

- Yes
- No
- n.a.

Confirmation that own collateral and assets plus the collateral and assets of participants were held with creditworthy third parties which, insofar as possible, are subject to supervision.

- Yes
- No
- n.a.

Confirmation that the supervised entity disclosed to the participant any use of the collateral provided by the participant for other purposes.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### **6.6 Risk models collateral and margin management incl. stress models, haircut, etc.**

Intervention

- Audit
- Critical assessment
- None

Confirmation that the models and parameters on which risk management is based have been appropriately reviewed and reported.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.7 Default management process

Intervention

- Audit
- Critical assessment
- None

Confirmation that an appropriate default management process is in place.

- Yes
- No
- n.a.

Confirmation that the rules and procedures were tested at least once a year.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.8 Segregation and portability

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has ensured the contractual, legal and operational segregation and portability of assets and securities.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.9 Settlement

#### Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has taken appropriate processes and defined settlement deadlines to ensure the proper recording and transfer of securities.

- Yes
- No
- n.a.

Confirmation that the supervised entity has specified the time after which a securities transfer order is irrevocable and may no longer be changed and when a securities transfer is settled.

- Yes
- No
- n.a.

Confirmation that securities are transferred in real time, but at the latest at the end of the value day.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.10 Custody function

#### Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has defined appropriate organisational measures to ensure the proper and lawful custody of securities.

- Yes
- No
- n.a.

Confirmation that the supervised entity has ensured on a daily basis and through appropriate organisational measures that its participants cannot overdraw their securities accounts for securities held in central custody with it.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.11 Specific requirements related to the provision of ancillary services

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has only operated one financial market infrastructure as a legal entity.

- Yes
- No
- n.a.

Confirmation of a corresponding licence or authorisation for the provision of ancillary services requiring a licence or authorisation under financial infrastructure laws and confirmation that the additional authorisation requirements were met.

- Yes
- No
- n.a.

Confirmation that FINMA's requirements were complied with for the provision of those ancillary services not contingent on any licence or authorisation under financial infrastructure laws.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

**6.12 Other risks from the legal, litigation and compliance area**

Intervention

- Audit
- Critical assessment
- None

Confirmation that the legal, litigation and compliance area applied appropriate methods/processes to identify, measure, manage and monitor the risks and that these methods/processes were applied effectively.

- Yes
- No
- n.a.

Confirmation that appropriate requirements were contractually stipulated.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

**6.13 General rules of conduct**

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has fulfilled the requirements of the documentation and retention duties.

- Yes
- No
- n.a.

Confirmation that effective organisational measures have been implemented to identify, prevent, settle and monitor conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the supervised entity ensured the publication of essential information.

- Yes
- No
- n.a.

Confirmation that the requirements of FINMA Circular 2017/6 have been appropriately implemented.

- Yes
- Nein
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.14 Corporate governance

Intervention

- Audit
- Critical assessment
- None

Confirmation that the requirements, principles and standards incumbent on the management body and the executive management have been complied with.

- Yes
- No
- n.a.

Confirmation that an appropriate institution-wide risk management framework has been developed and signed off.

- Yes
- No
- n.a.

Confirmation that the supervised entity had an appropriate, documented internal control system based on specifications, processes and systems.

- Yes
- No
- n.a.

Confirmation that the supervised entity has transparently disclosed the principles and structures on the basis of which the institution is directed and controlled.

- Yes
- No
- n.a.

Confirmation that the supervised entity has set up a user committee for every securities settlement system operated by it, on which issuers and participants are represented.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.15 Qualitative requirements for the management of operational risks

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has observed the qualitative requirements (principles) pertaining to the management of operational risks.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.16 Risk control function

Intervention

- Audit
- Critical assessment
- None

Confirmation that the organisational set-up of this function and the incentive system did not involve any conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the independent body had sufficient resources and competencies to perform its duties and meet its responsibilities effectively and that access to the governing body or its risk committee was assured for the impartial body.

- Yes
- No
- n.a.

Confirmation that the independent body had unrestricted information, access and inspection rights.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.17 Compliance function

Intervention

- Audit
- Critical assessment
- None

Confirmation that the organisational set-up of this function and the incentive system did not involve any conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the independent body had sufficient resources and competencies to perform its duties and meet its responsibilities effectively and that access to the governing body or its risk committee was assured for the impartial body.

- Yes
- No
- n.a.

Confirmation that the independent body had unrestricted information, access and inspection rights.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.18 Internal audit function

Confirmation that the supervised entity has established an internal audit function which has met the applicable subordination and organisational requirements.

- Yes
- No
- n.a.

Confirmation that the technological and personnel resources of internal audit function were adequate.

- Yes
- No
- n.a.

Confirmation that the internal audit function had the required professional competencies.

- Yes
- No
- n.a.

Confirmation that there was appropriate cooperation/coordination with the internal audit function.

- Yes
- No
- n.a.

Confirmation that access to the internal audit function's reports was guaranteed.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.19 IT

Element covered	Intervention
<input type="text"/>	<input type="radio"/> Audit <input type="radio"/> Critical assessment

Confirmation that the "IT" area was adequately designed (based on the knowledge of the elements covered).

- Yes
- No
- n.a.

Confirmation that the institution complied with the stricter requirements ordered by FINMA.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.20 Outsourcing

Element covered	Intervention
<input type="text"/>	<input type="radio"/> Audit <input type="radio"/> Critical assessment

Confirmation that the outsourcing requirements and principles have been generally met (based on the findings of the elements covered).

- Yes
- No
- n.a.

Confirmation that the requirements and principles regarding new outsourcing agreements have been met.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.21 BCM (business continuity management)

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had an approved and appropriate BCM strategy.

- Yes
- No
- n.a.

Confirmation that the supervised entity had prepared an appropriate business impact analysis.

- Yes
- No
- n.a.

Confirmation that the supervised entity has determined appropriate options for the recovery of the business process and data necessary for operations.

- Yes
- No
- n.a.

Confirmation that the supervised entity had appropriate procedures to ensure that participants' assets and positions can be transferred or settled immediately in the event of the withdrawal or return of authorisation.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.22 Compliance with money laundering regulations and other supervisory regulations

Intervention

- Audit
- Critical assessment
- None

Confirmation that client relationships were opened properly (incl. verification of the identity of the customer, establishing the identity of the beneficial owner).

- Yes
- No
- n.a.

Confirmation that client relationships with PEPs were managed correctly.

- Yes
- No
- n.a.

Confirmation that client relationships with increased risks were managed correctly.

- Yes
- No
- n.a.

Confirmation that the supervised entity had appropriate systems for monitoring transactions with higher risks.

- Yes
- No
- n.a.

Confirmation that transactions with higher risks were managed correctly.

- Yes
- No
- n.a.

Confirmation that – based on the audit procedures performed – the other provisions of the AMLA were complied with.

- Yes
- No
- n.a.

Confirmation that – based on findings from the audit procedures performed – the provisions governing the treatment of contactless and dormant accounts were complied with.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.23 Compliance with reporting duties

Intervention

- Audit
- Critical assessment
- None

Confirmation that appropriate organisational measures have been taken to comply with reporting duties.

- Yes
- No
- n.a.

Confirmation that reporting duties were complied with.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### 6.24 Corporate governance at group level

Confirmation that the requirements and principles pertaining to corporate governance were complied with at group level.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### 6.25 Group function for risk control and risk mitigation

Intervention

- Audit
- Critical assessment
- None

Confirmation that the technological and personnel resources of the compliance function were adequate and that it effectively carried out its responsibilities.

- Yes
- No
- n.a.

Confirmation that the technological and personnel resources of the risk control function were sufficient and that it effectively carried out its responsibilities.

- Yes
- No
- n.a.

Confirmation that the organisational set-up of these functions does not result in any conflict of interest.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### 6.26 Group internal audit

Confirmation that the technological and personnel resources of internal audit function were adequate.

- Yes
- No
- n.a.

Confirmation that the internal audit function had the required professional competencies.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### **6.27 Group-wide measures to combat money laundering and comply with Swiss and foreign supervisory regulations**

Intervention

- Audit
- Critical assessment
- None

Confirmation that appropriate organisational measures have been taken to comply with and monitor supervisory requirements in Switzerland and abroad.

- Yes
- No
- n.a.

Confirmation that all Swiss group companies have complied with Swiss anti-money laundering regulations.

- Yes
- No
- n.a.

Confirmation that foreign group companies were not used to circumvent domestic law.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### **6.28 Group-wide liquidity management measures**

Intervention

- Audit
- Critical assessment
- None

Confirmation the management of liquidity risks at group level was adequate.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.29 Group-wide measures to ensure compliance with capital adequacy and risk diversification requirements

Intervention

- Audit
- Critical assessment
- None

Confirmation that adequate organisational measures have been taken to comply with capital adequacy and risk diversification requirements at group level.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.30 Intra-group financing structures and contingent liabilities

Intervention

- Audit
- Critical assessment
- None

Confirmation that intra-group positions and structures were correctly approved, contractually agreed and monitored.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.31 Compliance with capital adequacy and risk diversification requirements

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had the minimum capital required at consolidated level.

- Yes
- No
- n.a.

Confirmation that the determination and calculation of the eligible capital were carried out correctly at consolidated level.

- Yes
- No
- n.a.

Confirmation that the determination and calculation of the minimum capital adequacy requirement were carried out correctly at consolidated level.

- Yes
- No
- n.a.

Confirmation that the supervised entity complied with the minimum capital adequacy requirements in accordance with the CAO at consolidated level.

- Yes
- No
- n.a.

Confirmation that the supervised entity had a plan approved by the body for governance, supervision and control at consolidated level that sets out how further capital is to be procured if the capital no longer fulfils the requirements.

- Yes
- No
- n.a.

Confirmation that the supervised entity has maintained appropriate directives, processes, controls and reporting schedules to monitor its capital adequacy requirements at consolidated level.

- Yes
- No
- n.a.

Confirmation that the supervised entity has appropriately monitored credit risks vis-à-vis single counterparty or group of associated counterparties at consolidated level based on the calculation principles set out in the CAO.

- Yes
- No
- n.a.

Confirmation that any specific obligations related to capital adequacy or risk diversification were observed by the supervised entity at consolidated level.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.32 Compliance with consolidated reporting duties

Intervention

- Audit
- Critical assessment
- None

Confirmation that appropriate organisational measures have been taken to comply with reporting duties.

- Yes
- No
- n.a.

Confirmation that reporting duties were complied with.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.33 Supplementary elements

If there is a parent company structure: the audit firm shall specify those group companies from which the material business risks (credit, market, operational and other risks) originate and summarise how these audit areas were covered during the reporting year (if other group companies with material business risks exist in addition to the company shown at individual level).

If there is a holding or atypical structure: the audit firm shall specify those group companies from which the material business risks (credit, market, operational and other risks) originate and summarise how these audit areas were covered during the reporting year.

## 6. Audit results - Trade repository

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### 6.1 Minimum capital, capital adequacy and risk diversification

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had the minimum capital required.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.2 Admission of participants

Intervention

- Audit
- Critical assessment
- None

Confirmation of fair and open access to services.

- Yes
- No
- n.a.

Confirmation that potential participants were subjected to an appropriate due diligence process with regard to access restrictions.

- Yes
- No
- n.a.

Confirmation that instruments were provided and incentives created so that participants can continuously manage and limit the risks arising for themselves or for the financial market infrastructure.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.3 Data management

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has fulfilled the requirements of the documentation and retention duties.

- Yes
- No
- n.a.

Confirmation that the supervised entity has fulfilled the requirements concerning the publication of data.

- Yes
- No
- n.a.

Confirmation that the supervised entity has ensured data access for Swiss and foreign authorities.

- Yes
- No
- n.a.

Confirmation that the trade repository has fulfilled the requirements of data transmission to private individuals.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.4 Specific requirements related to the provision of ancillary services

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has only operated one financial market infrastructure as a legal entity.

- Yes
- No
- n.a.

Confirmation of a corresponding licence or authorisation for the provision of ancillary services requiring a licence or authorisation under financial infrastructure laws and confirmation that the additional authorisation requirements were met.

- Yes
- No
- n.a.

Confirmation that FINMA's requirements were complied with for the provision of those ancillary services not contingent on any licence or authorisation under financial infrastructure laws.

- Yes
- No
- n.a.

Confirmation that the trade repository kept its ancillary services operationally segregated from its essential services.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.5 Other risks from the legal, litigation and compliance area

Intervention

- Audit
- Critical assessment
- None

Confirmation that the legal, litigation and compliance area applied appropriate methods/processes to identify, measure, manage and monitor the risks and that these methods/processes were applied effectively.

- Yes
- No
- n.a.

Confirmation that appropriate requirements were contractually stipulated.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.6 General rules of conduct

Intervention

- Audit
- Critical assessment
- None

Confirmation that effective organisational measures have been implemented to identify, prevent, settle and monitor conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the supervised entity ensured the publication of essential information.

- Yes
- No
- n.a.

Confirmation that the requirements of FINMA Circular 2017/06 have been appropriately implemented.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.7 Corporate governance

Intervention

- Audit
- Critical assessment
- None

Confirmation that the requirements, principles and standards incumbent on the management body and the executive management have been complied with.

- Yes
- No
- n.a.

Confirmation that the body for governance, supervision and control sets out the basic risk management principles and determines the risk tolerance of the financial market infrastructure.

- Yes
- No
- n.a.

Confirmation that an appropriate institution-wide risk management framework has been developed and signed off.

- Yes
- No
- n.a.

Confirmation that the supervised entity had an appropriate, documented internal control system based on specifications, processes and systems.

- Yes
- No
- n.a.

Confirmation that the supervised entity has transparently disclosed the principles and structures on the basis of which the institution is directed and controlled.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.8 Qualitative requirements for the management of operational risks

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has observed the qualitative requirements (principles) pertaining to the management of operational risks.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.9 Risk control function

Intervention

- Audit
- Critical assessment
- None

Confirmation that the organisational set-up of this function and the incentive system did not involve any conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the impartial body had sufficient resources and competencies to perform its duties and meet its responsibilities effectively and that access to the governing body or its risk committee was assured for the impartial body.

- Yes
- No
- n.a.

Confirmation that the impartial body had unrestricted information, access and inspection rights.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.10 Compliance function

Intervention

- Audit
- Critical assessment
- None

Confirmation that the organisational set-up of this function and the incentive system did not involve any conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the impartial body had sufficient resources and competencies to perform its duties and meet its responsibilities effectively and that access to the governing body or its risk committee was assured for the impartial body.

- Yes
- No
- n.a.

Confirmation that the impartial body had unrestricted information, access and inspection rights.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.11 Internal audit function

Confirmation that the supervised entity has established an internal audit function which has met the applicable subordination and organisational requirements.

- Yes
- No
- n.a.

Confirmation that the technological and personnel resources of internal audit function were adequate.

- Yes
- No
- n.a.

Confirmation that the internal audit function had the required professional competencies.

- Yes
- No
- n.a.

Confirmation that there was appropriate cooperation/coordination with the internal audit function.

- Yes
- No
- n.a.

Confirmation that access to the internal audit function's reports was guaranteed.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.12 IT

Element covered	Intervention
<input type="text"/>	<input type="radio"/> Audit <input type="radio"/> Critical assessment

Confirmation that the "IT" area was adequately designed (based on the knowledge of the elements covered).

- Yes
- No
- n.a.

Confirmation that the institution complied with the stricter requirements ordered by FINMA.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.13 Outsourcing

Element covered	Intervention
<input type="text"/>	<input type="radio"/> Audit <input type="radio"/> Critical assessment

Confirmation that the outsourcing requirements and principles have been generally met (based on the findings of the elements covered).

- Yes
- No
- n.a.

Confirmation that the requirements and principles regarding new outsourcing agreements have been met.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.14 BCM (business continuity management)

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had an approved and appropriate BCM strategy.

- Yes
- No
- n.a.

Confirmation that the supervised entity had prepared an appropriate business impact analysis.

- Yes
- No
- n.a.

Confirmation that the supervised entity has determined appropriate options for the recovery of the business process and data necessary for operations.

- Yes
- No
- n.a.

Confirmation that the supervised entity had appropriate procedures to ensure that participants' assets and positions can be transferred or settled immediately in the event of the withdrawal or return of authorisation.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.15 Compliance with reporting duties

Intervention

- Audit
- Critical assessment
- None

Confirmation that appropriate organisational measures have been taken to comply with reporting duties.

- Yes
- No
- n.a.

Confirmation that reporting duties were complied with.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.16 Corporate governance at group level

Confirmation that the requirements and principles pertaining to corporate governance were complied with at group level.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.17 Group functions for risk control and risk mitigation

Intervention

- Audit
- Critical assessment
- None

Confirmation that the technological and personnel resources of the compliance function were adequate and that it effectively carried out its responsibilities.

- Yes
- No
- n.a.

Confirmation that the technological and personnel resources of the risk control function were sufficient and that it effectively carried out its responsibilities.

- Yes
- No
- n.a.

Confirmation that the organisational arrangement of these functions does not result in any conflict of interest.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.18 Group internal audit

Confirmation that the technological and personnel resources of internal audit function were adequate.

- Yes
- No
- n.a.

Confirmation that the internal audit function had the required professional competencies.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.19 Group-wide liquidity management measures

Intervention

- Audit
- Critical assessment
- None

Confirmation that sufficient organisational measures were taken to steer and manage liquidity at group level.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.20 Intra-group financing structures and contingent liabilities

Intervention

- Audit
- Critical assessment
- None

Confirmation that intra-group positions and structures were correctly approved, contractually agreed and monitored.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.21 Compliance with capital adequacy and risk diversification requirements

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had the minimum capital required at consolidated level.

- Yes
- No
- n.a.

Confirmation that the determination and calculation of the eligible capital were carried out correctly at consolidated level.

- Yes
- No
- n.a.

Confirmation that the determination and calculation of the minimum capital adequacy requirement were carried out correctly at consolidated level.

- Yes
- No
- n.a.

Confirmation that the supervised entity complied with the minimum capital adequacy requirements in accordance with the CAO at consolidated level.

- Yes
- No
- n.a.

Confirmation that the supervised entity had a plan approved by the body for governance, supervision and control at consolidated level that sets out how further capital is to be procured if the capital no longer fulfils the requirements.

- Yes
- No
- n.a.

Confirmation that the supervised entity has maintained appropriate directives, processes, controls and reporting schedules to monitor its capital adequacy requirements at consolidated level.

- Yes
- No
- n.a.

Confirmation that the supervised entity has appropriately monitored credit risks vis-à-vis single counterparty or group of associated counterparties at consolidated level based on the calculation principles set out in the CAO.

- Yes
- No
- n.a.

Confirmation that any specific obligations related to capital adequacy or risk diversification were observed by the supervised entity at consolidated level.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.22 Compliance with consolidated reporting duties

Intervention

- Audit
- Critical assessment
- None

Confirmation that appropriate organisational measures have been taken to comply with reporting duties.

- Yes
- No
- n.a.

Confirmation that reporting duties were complied with.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.23 Supplementary elements

If there is a parent company structure: the audit firm shall specify those group companies from which the material business risks (credit, market, operational and other risks) originate and summarise how these audit areas were covered during the reporting year (if other group companies with material business risks exist in addition to the company shown at individual level).

If there is a holding or atypical structure: the audit firm shall specify those group companies from which the material business risks (credit, market, operational and other risks) originate and summarise how these audit areas were covered during the reporting year.

## 6. Audit results - Payment system

---

### 6.1 Minimum capital, capital adequacy and risk diversification

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had the minimum capital required.

- Yes
- No
- n.a.

Confirmation that the supervised entity held sufficient capital to implement the plan in the event of a voluntary cessation of business, with a minimum requirement of covering ongoing operating expenditure for six months.

- Yes
- No
- n.a.

Confirmation that any specific duties related to capital adequacy or risk diversification were observed by the supervised entity.

- Yes
- No
- n.a.

Confirmation that the supervised entity has appropriately monitored credit risks vis-à-vis single counterparty or group of associated counterparties.

- Yes
- No
- n.a.

Confirmation that the supervised entity has maintained appropriate directives, processes, controls and reporting schedules to monitor its capital adequacy requirements.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.2 Liquidity

Intervention

- Audit
- Critical assessment
- None

Confirmation that the execution of the supervised entity's services and operations was guaranteed.

- Yes
- No
- n.a.

Confirmation that the supervised entity had appropriate models and methods in place to fulfil its payment obligations in all currencies under extreme but plausible market conditions, even in the event of the default of the participant to which it has its greatest exposure.

- Yes
- No
- n.a.

Confirmation that the financial resources were held solely in cash or invested in liquid financial instruments with a low market and credit risk.

- Yes
- No
- n.a.

Confirmation that the supervised entity's investment strategy is in line with its risk management strategy and that concentration risk is adequately managed.

- Yes
- No
- n.a.

Confirmation that the supervised entity has maintained appropriate directives, processes, controls and reporting schedules to monitor its liquidity requirements.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.3 Admission of participants

Intervention

- Audit
- Critical assessment
- None

Confirmation of fair and open access to services.

- Yes
- No
- n.a.

Confirmation that potential participants were subjected to an appropriate due diligence process with regard to access restrictions.

- Yes
- No
- n.a.

Confirmation that instruments were provided and incentives created so that participants can continuously manage and limit the risks arising for themselves or for the financial market infrastructure.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### **6.4 Collateral and margin management: process recovery and management**

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had suitable measures to ensure an appropriate composition and valuation of collateral and margins.

- Yes
- No
- n.a.

Confirmation that own collateral and assets plus the collateral and assets of participants were held with creditworthy third parties which, insofar as possible, are subject to supervision.

- Yes
- No
- n.a.

Confirmation that the supervised entity disclosed to the participant any use of the collateral provided by the participant for other purposes.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### **6.5 Risk models collateral and margin management incl. stress models, haircut etc.**

Intervention

- Audit
- Critical assessment
- None

Confirmation that the models and parameters on which risk management is based have been appropriately reviewed and reported.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.6 Settlement

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has taken appropriate organisational measures to ensure fulfilment of the participants' payment obligations.

- Yes
- No
- n.a.

Confirmation that the supervised entity has taken appropriate organisational measures to ensure the proper and lawful clearing and settlement of payment obligations.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.7 Specific requirements related to the provision of ancillary services

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has only operated one financial market infrastructure as a legal entity.

- Yes
- No
- n.a.

Confirmation of a corresponding licence or authorisation for the provision of ancillary services requiring a licence or authorisation under financial infrastructure laws and confirmation that the additional authorisation requirements were met.

- Yes
- No
- n.a.

Confirmation that FINMA's requirements were complied with for the provision of those ancillary services not contingent on any licence or authorisation under financial infrastructure laws.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.8 Other risks from the legal, litigation and compliance area

Intervention

- Audit
- Critical assessment
- None

Confirmation that the legal, litigation and compliance area applied appropriate methods/processes to identify, measure, manage and monitor the risks and that these methods/processes were applied effectively.

- Yes
- No
- n.a.

Confirmation that appropriate requirements were contractually stipulated.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.9 General rules of conduct

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has fulfilled the requirements of the documentation and retention duties.

- Yes
- No
- n.a.

Confirmation that effective organisational measures have been implemented to identify, prevent, settle and monitor conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the supervised entity ensured the publication of essential information.

- Yes
- No
- n.a.

Confirmation that the requirements of FINMA Circular 2017/6 have been appropriately implemented.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.10 Corporate governance

Intervention

- Audit
- Critical assessment
- None

Confirmation that the requirements, principles and standards incumbent on the management body and the executive management have been complied with.

- Yes
- No
- n.a.

Confirmation that the body for governance, supervision and control sets out the basic risk management principles and determines the risk tolerance of the financial market infrastructure.

- Yes
- No
- n.a.

Confirmation that an appropriate institution-wide risk management framework has been developed and signed off.

- Yes
- No
- n.a.

Confirmation that the supervised entity had an appropriate, documented internal control system based on specifications, processes and systems.

- Yes
- No
- n.a.

Confirmation that the supervised entity has transparently disclosed the principles and structures on the basis of which the institution is directed and controlled.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.11 Qualitative requirements for the management of operational risks

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity has observed the qualitative requirements (principles) pertaining to the management of operational risks.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.12 Risk control function

Intervention

- Audit
- Critical assessment
- None

Confirmation that the organisational set-up of this function and the incentive system did not involve any conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the independent body had sufficient resources and competencies to perform its duties and meet its responsibilities effectively and that access to the governing body or its risk committee was assured for the impartial body.

- Yes
- No
- n.a.

Confirmation that the independent body had unrestricted information, access and inspection rights.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.13 Compliance function

#### Intervention

- Audit
- Critical assessment
- None

Confirmation that the organisational set-up of this function and the incentive system did not involve any conflicts of interest.

- Yes
- No
- n.a.

Confirmation that the independent body had sufficient resources and competencies to perform its duties and meet its responsibilities effectively and that access to the governing body or its risk committee was assured for the impartial body.

- Yes
- No
- n.a.

Confirmation that the independent body had unrestricted information, access and inspection rights.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

#### 6.14 Internal audit function

Confirmation that the supervised entity has established an internal audit function which has met the applicable subordination and organisational requirements.

- Yes
- No
- n.a.

Confirmation that the technological and personnel resources of internal audit function were adequate.

- Yes
- No
- n.a.

Confirmation that the internal audit function had the required professional competencies.

- Yes
- No
- n.a.

Confirmation that there was appropriate cooperation/coordination with the internal audit function.

- Yes
- No
- n.a.

Confirmation that access to the internal audit function's reports was guaranteed.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.15 IT

Element covered	Intervention
<input type="text"/>	<input type="radio"/> Audit <input type="radio"/> Critical assessment

Confirmation that the "IT" area was adequately designed (based on the knowledge of the elements covered).

- Yes
- No
- n.a.

Confirmation that the institution complied with the stricter requirements ordered by FINMA.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.16 Outsourcing

Element covered	Intervention
<input type="text"/>	<input type="radio"/> Audit <input type="radio"/> Critical assessment

Confirmation that the outsourcing requirements and principles have been generally met (based on the findings of the elements covered).

- Yes
- No
- n.a.

Confirmation that the requirements and principles regarding new outsourcing agreements have been met.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.17 BCM (business continuity management)

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had an approved and appropriate BCM strategy.

- Yes
- No
- n.a.

Confirmation that the supervised entity had prepared an appropriate business impact analysis.

- Yes
- No
- n.a.

Confirmation that the supervised entity has determined appropriate options for the recovery of the business process and data necessary for operations..

- Yes
- No
- n.a.

Confirmation that the supervised entity had appropriate procedures to ensure that participants' assets and positions can be transferred or settled immediately in the event of the withdrawal or return of authorisation.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.18 Compliance with money laundering regulations and other supervisory regulations

Intervention

- Audit
- Critical assessment
- None

Confirmation that client relationships were opened properly (incl. verification of the identity of the customer, establishing the identity of the beneficial owner).

- Yes
- No
- n.a.

Confirmation that client relationships with PEPs were managed correctly.

- Yes
- No
- n.a.

Confirmation that client relationships with increased risks were managed correctly.

- Yes
- No
- n.a.

Confirmation that the supervised entity had appropriate systems for monitoring transactions with higher risks.

- Yes
- No
- n.a.

Confirmation that transactions with higher risks were managed correctly.

- Yes
- No
- n.a.

Confirmation that – based on the audit procedures performed – the other provisions of the AMLA were complied with.

- Yes
- No
- n.a.

Confirmation that – based on findings from the audit procedures performed – the provisions governing the treatment of contactless and dormant accounts were complied with.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.19 Compliance with reporting duties

Intervention

- Audit
- Critical assessment
- None

Confirmation that appropriate organisational measures have been taken to comply with reporting duties.

- Yes
- No
- n.a.

Confirmation that reporting duties were complied with.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.20 Corporate governance at group level

Confirmation that the requirements and principles pertaining to corporate governance were complied with at group level.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.21 Group functions for risk control and risk mitigation

Intervention

- Audit
- Critical assessment
- None

Confirmation that the technological and personnel resources of the compliance function were adequate and that it effectively carried out its responsibilities.

- Yes
- No
- n.a.

Confirmation that the technological and personnel resources of the risk control function were sufficient and that it effectively carried out its responsibilities.

- Yes
- No
- n.a.

Confirmation that the organisational set up of these functions does not result in any conflict of interest.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.22 Group internal audit

Confirmation that the technological and personnel resources of internal audit function were adequate.

- Yes
- No
- n.a.

Confirmation that the internal audit function had the required professional competencies.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

### 6.23 Group-wide measures to combat money laundering and comply with Swiss and foreign supervisory regulations

Intervention

- Audit
- Critical assessment
- None

Confirmation that appropriate organisational measures have been taken to comply with and monitor supervisory requirements in Switzerland and abroad.

- Yes
- No
- n.a.

Confirmation that all Swiss group companies have complied with Swiss anti-money laundering regulations.

- Yes
- No
- n.a.

Confirmation that foreign group companies were not used to circumvent domestic law.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

**6.24 Group-wide liquidity management measures**

Intervention

- Audit
- Critical assessment
- None

Confirmation the management of liquidity risks at group level was adequate.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

**6.25 Group-wide measures to ensure compliance with capital adequacy and risk diversification requirements**

Intervention

- Audit
- Critical assessment
- None

Confirmation that adequate organisational measures have been taken to comply with capital adequacy and risk diversification requirements at group level.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.26 Intra-group financing structures and contingent liabilities

Intervention

- Audit
- Critical assessment
- None

Confirmation that intra-group positions and structures were correctly approved, contractually agreed and monitored.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.27 Compliance with capital adequacy and risk diversification requirements

Intervention

- Audit
- Critical assessment
- None

Confirmation that the supervised entity had the minimum capital required at consolidated level.

- Yes
- No
- n.a.

Confirmation that the determination and calculation of the eligible capital were carried out correctly at consolidated level.

- Yes
- No
- n.a.

Confirmation that the determination and calculation of the minimum capital adequacy requirement were carried out correctly at consolidated level.

- Yes
- No
- n.a.

Confirmation that the supervised entity complied with the minimum capital adequacy requirements in accordance with the CAO at consolidated level.

- Yes
- No
- n.a.

Confirmation that the supervised entity had a plan approved by the body for governance, supervision and control at consolidated level that sets out how further capital is to be procured if the capital no longer fulfils the requirements.

- Yes
- No
- n.a.

Confirmation that the supervised entity has maintained appropriate directives, processes, controls and reporting schedules to monitor its capital adequacy requirements at consolidated level.

- Yes
- No
- n.a.

Confirmation that the supervised entity has appropriately monitored credit risks vis-à-vis single counterparty or group of associated counterparties at consolidated level based on the calculation principles set out in the CAO.

- Yes
- No
- n.a.

Confirmation that any specific obligations related to capital adequacy or risk diversification were observed by the supervised entity at consolidated level.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.28 Compliance with consolidated reporting duties

Intervention

- Audit
- Critical assessment
- None

Confirmation that appropriate organisational measures have been taken to comply with reporting duties.

- Yes
- No
- n.a.

Confirmation that reporting duties were complied with.

- Yes
- No
- n.a.

Summary of the audit procedures performed

Explanation of audit confirmations answered with "n.a."

## 6.29 Supplementary elements

If there is a parent company structure: the audit firm shall specify those group companies from which the material business risks (credit, market, operational and other risks) originate and summarise how these audit areas were covered during the reporting year (if other group companies with material business risks exist in addition to the company shown at individual level).

If there is a holding or atypical structure: the audit firm shall specify those group companies from which the material business risks (credit, market, operational and other risks) originate and summarise how these audit areas were covered during the reporting year.

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## 7. Additional audits

Additional rows can be added to the table as needed.

Audit field / topic	Specific requirements
Legal basis	Audit depth
	<input type="radio"/> Critical assessment <input type="radio"/> Audit
Summary of audit results	
Audit field / topic	Specific requirements
Legal basis	Audit depth
	<input type="radio"/> Critical assessment <input type="radio"/> Audit
Summary of audit results	

## 8. Other remarks

### 8.1 Events after the end of the audit period

In the following, the audit firm describes all significant events identified in the period between the completion of the audit procedures and the submission of the audit report.

Were significant events identified between the completion of the audit procedures and the delivery of the audit report?

Yes  No

Designation
Description, including any measures to be taken or that have been taken

Status of implementation
Assessment of the impact on risk analysis
Designation
Description, including any measures to be taken or that have been taken
Status of implementation
Assessment of the impact on risk analysis

### 8.2 Supplementary remarks / information

The audit firm's further comments/information are intended to supplement the issues listed above. Where the audit firm deems it necessary, it should serve to round the overall picture of the supervisory audit report (e.g. supplementary reporting). They may not be formulated in a way which diminishes the statements made by auditors in this report or in the individual audit programmes.

Other remarks

## 9. Signatures / confirmations of the audit firm

This audit report must present the results of the audit in a comprehensive, unambiguous and objective manner. The lead auditor together with another auditor with signatory powers have to confirm this with their signatures (qualified electronic signature) on the report (PDF), which they submit as an attachment to the electronic survey via the FINMA survey platform.

If it is not possible to sign the report electronically in a qualified manner, it must be printed out, signed by hand and submitted to FINMA by post in addition to the electronic submission of the survey via the FINMA survey platform.

Signature of lead auditor

Signature of additional person

## 10. Appendix

The following documents must be submitted with the audit report

- The "Risk analysis" and "Presentation of audit strategy" forms, if they differ in any way from the original versions (at company and, if applicable, group level)
- A comprehensive report to the board of directors of the supervised entity in accordance with Article 728b para. 1 of the Swiss Code of Obligations
- A graphic representation of the group structure including participation structures (taking account of additional information on consolidated supervision)
- Organisational chart(s) (as a minimum with details of the people responsible for each division and/or department)

Additional Documents:

Document:
<input type="text"/>
Document:
<input type="text"/>