

The Association of Global Custodians - Questionnaire 2025 - 2026

Entity Name	Ukraine National Bank of Ukraine		
Contact Name	Mr Andrii Suprun, Head of the Office for Corporate Rights and NBU CSD Services		
Address	9, Instytutska Street, Kyiv, 01601		
Country	Ukraine		
Phone	+38 044 254-06-16	Fax	+38 044 253 7750 or +38 044 230 2033
Email			
Web Site	https://bank.gov.ua/en/		

Welcome to the Depository-Information Gathering Project.

Before beginning, we suggest that you print the entire document for review on paper and review the Glossary of Terms. Each will assist you with answering the questions. For help, contact: Robin D. Truesdale, Baker & McKenzie LLP (202) 835-1664; e-mail:

Robin.Truesdale@bakermckenzie.com.

Note

- * When reviewing/updating your prior year's responses in the questionnaire, please ensure that the sub-questions are reviewed/updated as well.
- * Please deselect/uncheck any responses in the sub-questions where those responses are no longer applicable.
- * Please note: Any text in the “other” and/or “please explain/describe” questions should be deleted before deselecting the response. In this regard, note that deselecting a response with written text does not delete the information, it only hides the information from view.* Any responses that appear in open text boxes should be deleted if the information is no longer applicable.

SCOPE, STRUCTURE, OWNERSHIP, CAPITAL, REGULATION AND AUDIT

The purpose of this section is to understand the ownership structure and financial strength of your institution, as well as the level of regulatory and operational supervision to which it is subject.

Response Necessary/Eligibility Question

1. Rule 17f-7, by reference to Rule 17f-4, requires that, for a depository to be eligible to hold securities of U.S. registered investment companies (such depositories hereinafter referred to as “Eligible Securities Depositories”), the depository must be a “system for the central handling of securities where all securities of any particular class or series of any issuer deposited within the system are treated as fungible and may be transferred or pledged by bookkeeping entry without physical delivery of the securities.”

Are all securities of a particular class or series of any issuer that are deposited in your institution treated as fungible, and can they be transferred or pledged by bookkeeping entry without physical delivery of the securities?

- ☒ Yes
- ☐ No (please answer 1a)
- ☐ Other (please answer 1a)

1a. Please explain:

Response Necessary/Eligibility Question

2. Rule 17f-7 also requires that an Eligible Securities Depository “acts as or operates a system for the central handling of securities or equivalent book-entries in the country where it is incorporated,” or “acts as or operates a transnational system for the central handling of securities or equivalent book-entries.” Does your institution: (Choose all that apply.)

- ☒ Act as or operate a system for the central handling of securities or equivalent book-entries in the country where it is incorporated? (please answer 2b)
- ☐ Act as or operate a transnational system for the central handling of securities or equivalent book-entries? (please answer 2b)
- ☐ Act in another capacity with respect to the handling of securities or equivalent book-entries? (please answer 2a)
- ☐ Not applicable (please answer 2a)
- ☐ Other (please answer 2a)

2b. Please specify the types of securities for which you act as or operate a system for the central handling of securities or equivalent book-entries:

In its role of the CSD, the National Bank of Ukraine services all types of government securities.

3. What type of legal entity is the institution? (Choose all that apply.)

- ☐ Public Company
- ☐ Private Company
- ☒ Central Bank (or part thereof)
- ☐ Stock Exchange (or part thereof)
- ☐ Other (please answer 3a)

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

- ☐ For profit
- ☒ Not for profit
- ☐ Other (please answer 4a)

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

100% state-owned.

6. Please answer the following:

6a. What is the date of establishment of the depository? 16/07/1996

6b. What is the date that the depository's operations began? 16/07/1996

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

- Law of Ukraine 'On the National Bank of Ukraine'
- Law of Ukraine 'On Depository System of Ukraine'
- Law of Ukraine 'On Capital Markets and Organized Commodity Markets'
- Regulation on Depository and Clearing Activity, and Settlement of Securities Transactions by the National Bank of Ukraine, approved by the NBU Board Resolution No.140 as of 21.12.2017

7a. Is the regulation or statute electronically available?

- ☒ Yes (please answer 7b)
- ☐ No

7b. If regulation or statute is electronically available, please supply web address(es) here or upload document(s) in question 7c.

- Law of Ukraine 'On the National Bank of Ukraine'
- <https://zakon.rada.gov.ua/laws/show/679-14#Text> (UKR version)
- https://bank.gov.ua/en/legislation/Law_NBU (ENG version)

- Law of Ukraine 'On Depository System of Ukraine'
<http://zakon5.rada.gov.ua/laws/show/5178-17> (UKR version)
- Law of Ukraine 'On Capital Markets and Organized Commodity Markets'
<https://zakon.rada.gov.ua/laws/show/3480-15#Text> (UKR version)
- Regulation on Depository and Clearing Activity, and Settlement of Securities Transactions by the National Bank of Ukraine, approved by the NBU Board Resolution No.140 as of 21.12.2017
https://bank.gov.ua/en/legislation/Regulation_21122017_140 (ENG version)
<https://zakon.rada.gov.ua/laws/show/v0140500-17#Text> (UKR version)

7c. Please supply document(s) here:

**7d. Please provide details of the structure and composition of your Board together with their industry experience and responsibilities in governing the depository.
What are the qualifications to become a board member?**

Current information is available in Section III (Organisation and Structure of the NBU) of the Law of Ukraine 'On the National Bank of Ukraine'.
To become a member of NBU Board the candidate shall be a citizen of Ukraine permanently residing in Ukraine and having full higher education in economics, finance or law, or academic degree in these fields as well as experience of work of not less than 10 years in the legislative bodies or in managerial positions in other state authorities and the state agencies ensuring implementation of the state financial, economic or legal policies, or in managerial positions in international financial organizations, or in managerial positions in a bank, or scientific research experience in the field of finance, economics or laws, and shall be able to hold this position due to his/her business, moral qualities and state of health, provided there is no information about such a person in the Unified State Register of Persons Who Have Committed Corruption or Corruption-Related Offenses.
A person cannot be appointed to the NBU Board, if such person has a representation mandate or is a (former) head of a public authority, other government body, Chairperson or a member of the NBU Council (other than NBU Governor), if the person left office less than a year ago; or is a public servant, or a leader of a political party or a member of the governing body of a political party, or is an employee of a legal entity, including its head or a member of the governing body of the legal entity (except for the NBU and other legal entities where the participation of NBU representative in governing bodies is required by the law or some shares (stakes) are owned by the NBU), or owns directly or indirectly shares (stakes) of a legal entity subject to the NBU’s regulation and supervision. During their tenure the NBU Board members shall suspend membership in any political party.
A person also cannot be a member of the NBU Board if:
1) by a court decision, the person has been declared incapacitated or has limited civil capacity
2) according to a court verdict that has entered into force, the person has been deprived of the right to engage in activities related to the performance of state functions, or to hold certain positions
3) the person has been held criminally liable by court for a corruption criminal offense
4) the person has a criminal record that has not been expunged or removed in accordance with the procedure established by law, for committing criminal offenses against property, in the sphere of economic activities, in the sphere of official activities and professional activities related to the provision of public services, regardless of their severity, as well as for committing other intentional criminal offenses, if such offenses have been classified as crimes of medium gravity, serious or especially serious crimes (except for corruption criminal offenses)
5) the person has been a qualifying holder in a financial institution for at least a year during the two years before the date of the decision by the authorized body (on its initiative) on declaring such financial institution insolvent, or revoking (cancelling) the license, or cancelling the state registration, or liquidation of such financial institution, or before the date as of which the court declared such financial institution bankrupt or adopted the decision to liquidate it
6) the person has been a member of a management body of a financial institution (except for a bridge bank established as part of insolvent bank resolution procedure) who held the office for at least six months during one year before the date of the decision by the authorized body (on its initiative) on declaring such financial institution insolvent, or revoking (cancelling) the license, or cancelling the state registration, or liquidation of such financial institution
7) the person has been a member of a management body of a financial institution and held the office for at least six months during one year before the date on which the court declared such financial institution bankrupt or adopted the decision to liquidate it
8) the person has been a member of a financial institution’s (except for a bridge bank established as part of insolvent bank resolution procedure) collegial body that has been delegated the right to make decisions on the issues related to lending and management of assets and liabilities of the financial institution, or he/ she held the office of the chief accountant, or the head of the internal audit unit, or the chief risk officer, or financial monitoring officer in the financial institution for at least six months during one year before the date of the decision by the authorized body (on its initiative) on declaring such financial institution insolvent, or revoking (cancelling) the license, or cancelling the state registration, or liquidation of such financial institution
9) the person has been a member of a financial institution’s collegial body that has been delegated the right to make decisions on the issues related to lending and management of assets and liabilities of the financial institution, or he/ she held the office of the chief accountant, or the head of the internal audit unit, or the chief risk officer, or financial monitoring officer in the financial institution for at least six months during one year before the date on which the court declared such financial institution bankrupt or adopted the decision to liquidate it
10) in respect of such person, the financial institution at the request of the NBU has taken measures to terminate the powers of such person or to replace them, or the NBU suspended such person from office as a corrective measure
11) an insolvency proceeding has been opened against such person
12) the person has been expelled from the professional association (union) of legal professionals (including lawyers), auditors, accountants for identified violations or the information about such person was excluded from the relevant registers or records were made in said registers prohibiting such persons to engage in certain activities for the detected violations
13) the person has been enforced by a court decision to pay taxes, duties, and other mandatory charges during the last two years, if the total outstanding amount equals or exceeds 100 minimum monthly wages established by Ukrainian law for the period, when the enforcement was executed
14) the person has arrears of child support, the total amount of which exceeds the amount of the relevant payments for twelve months from the date when the enforcement

7e. What are the election procedures?

Current information is available in Section III (Organisation and Structure of the NBU) of the Law of Ukraine 'On the National Bank of Ukraine'.
The NBU Board is a joint body consisting of seven members: the NBU Governor, the first deputy governor, and deputy governors. The NBU Governor shall be nominated by the President of Ukraine and appointed by the Verkhovna Rada of Ukraine for the period of seven years. The NBU Governor cannot serve more than two consecutive terms. All NBU deputy governors are appointed and dismissed by the NBU Council at the suggestion of the NBU Governor. NBU deputy governors shall be appointed for seven years. The NBU deputy governors should be appointed and dismissed in a way to ensure the NBU Board quorum at all times, as set forth in Article 17, part 3 of this Law. NBU deputy governors cannot serve more than two consecutive terms.

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

The NBU Governor shall be nominated by the President of Ukraine and appointed by the Verkhovna Rada of Ukraine for the period of seven years. The NBU Governor cannot serve more than two consecutive terms. All NBU deputy governors are appointed and dismissed by the NBU Council at the suggestion of the NBU Governor. NBU deputy governors shall be appointed for seven years. The NBU deputy governors should be appointed and dismissed in a way to ensure the NBU Board quorum at all times, as set forth in Article 17, part 3 of this Law. NBU deputy governors cannot serve more than two consecutive terms.

7g. How are the voting powers distributed amongst the board members (i.e. does each board member have one vote or do certain members have additional voting power)?

NBU Board decisions are taken by a simple majority vote. Each Board member has one vote. When the votes are equally divided, the NBU Governor may cast the deciding vote. Four Board members constitute a quorum.

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

Current information is available in Sections II-III, IX of the Law of Ukraine 'On the National Bank of Ukraine'.
The NBU Council shall assess the NBU Board progress in implementation of the Monetary Policy Guidelines and in other areas where decisions are binding for the NBU Board. The NBU shall be accountable to the President of Ukraine and the Verkhovna Rada of Ukraine within their constitutional authority.
The accountability shall mean the following:
1) the NBU Governor is nominated by the President of Ukraine and appointed and dismissed by Verkhovna Rada of Ukraine;
2) a half of the NBU Council members is appointed and dismissed by the President of Ukraine;
3) a half of the NBU Council members is appointed and dismissed by the Verkhovna Rada of Ukraine;
4) the NBU Governor presents to the Verkhovna Rada of Ukraine a report about the NBU’s activities annually, no later than on 1 May;
5) submission to the President of Ukraine and the Verkhovna Rada of Ukraine of an annual report on the monetary policy implementation for the previous year.

Response Necessary/Eligibility Question

8. Rule 17f-7 requires that an Eligible Securities Depository “is regulated by a foreign financial regulatory authority as defined under section 2(a)(50) of the Act”, with section 2(a)(50) establishing that “‘foreign financial regulatory authority’ means any (A) foreign securities authority, (B) other governmental body or foreign equivalent of a self-regulatory organization empowered by a foreign government to administer or enforce its laws relating to the regulation of fiduciaries, trusts, commercial lending, insurance, trading in contracts of sale of a commodity for future delivery, or other instruments traded on or subject to the rules of a contract market, board of trade or foreign equivalent, or other financial activities, or (C) membership organization a function of which is to regulate the participation of its members in activities listed above.”

Who regulates the activities of the depository? (Choose all that apply.)

- ☒ A governmental body or regulatory organization empowered to administer or enforce laws related to securities matters.
- ☐ A governmental body or self-regulatory organization empowered to administer or enforce laws related to other financial activities.
- ☐ A membership organization which regulates the participation of its members in securities matters or other financial activities.
- ☐ Other (please answer 8a)

9. Please provide the name of regulatory authority(ies) identified in question 8:

1) the National Bank of Ukraine; 2) the National Securities and Stock Market Commission

The National Bank of Ukraine is a self-regulatory authority. The National Securities and Stock Market Commission is empowered to regulate securities market, but it has no enforcement tools to be applied to NBU as a depository. Still, the Commission approves the NBU Depository Regulation that stipulates peculiarities of the NBU’s depository activity. The Commission can also send NBU CSD bidding orders or requests to take measures, including cancellation of certain decisions, termination of certain actions exercised by NBU CSD or termination of the NBU CSD’s inactivity, which are sent to eliminate violations of relevant legislation and reduce such violations’ negative consequences.

Response Necessary/Eligibility Question

10. Rule 17f-7 requires that an Eligible Securities Depository “is subject to periodic examination by regulatory authorities or independent accountants.”

Is the depository subject to periodic examination by: (Choose all that apply.)

- ☐ Regulatory authorities?
- ☐ Independent accountants?
- ☒ Other (please answer 10a)

10a. Please explain:

The NBU is empowered by law to act as a CSD for all types of government securities. The NBU CSD is subject to periodic examination of the internal audit of NBU. NBU CSD is also subject to regular oversight conducted by dedicated structural unit of NBU. NBU in its role of the Central Bank is empowered by law to conduct oversight of Financial Market Infrastructures (FMIs) that exercise functions of the Central Securities Depository, Central Counterparty, Trade Repository, and Securities Settlement System. The oversight is conducted to assess FMI’s compliance with Principles for Financial Market Infrastructures in order to provide for FMI’s efficient and reliable operation as well as its business continuity. NBU in its role of the Central Bank is also subject to regular external independent audit.

11. What enforcement actions are available to the regulatory authority(ies) for breach of applicable statute or regulatory requirements? (Choose all that apply.)
Name of Authority #1 (please answer 11a):

the National Bank of Ukraine (the NBU)

11a.

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

11b. Please explain:

The NBU may impose disciplinary sanctions on NBU employees for improper fulfillment of their obligations resulting in violations of the Depository Operations Regulation requirements. Following the NBU assessment of NBU CSD’s compliance with the Principles for Financial Market Infrastructure (PFMI), the NBU may provide recommendations to the NBU CSD on improving its activity to meet requirements of PFMI. Internal auditors provide recommendations following the results of periodic examination.

Name of Authority #2 (please answer 11c):

11c.

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

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

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

Capital

13. Are annual financial statements publicly disclosed?

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

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

- ☒ Yes (please answer 13b)
No (if no, please send a copy of the annual report to the Washington office of Baker & McKenzie, 815 Connecticut Ave., NW,Washington, DC 20006, Attn: Robin Truesdale)

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

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

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

<https://bank.gov.ua/en/news/all/konsolidovana-finansova-zvitnist-ta-konsolidovaniy-zvit-pro-upravlinnya-za-rik-scho-zakinchivsy-a-31-grudnya-2024-roku>

Internal Audit

14. Is an internal audit undertaken in your depository?

- ☒ Yes (please answer 14a)
- ☐ No (please proceed to 15)

14a. If yes, what areas does the audit cover (financials, operations, etc.) and which department in your depository handles it?

Operational and IT Audit by the Audit Department of the NBU

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

18/04/2022

Please list the period that the audit covered:

29/08/2019 to 28/12/2021

14c. How frequently does the internal audit occur? (Choose one.)

- ☐ Two or more times a year (please answer 14e)

- ☐ Annually (please answer 14e)
- ☒ Less than annually (please answer 14d)

14d. If less than annually, please explain:

According to the NBU's internal regulation, there is no obligation to conduct the operational internal audit annually.

When the NBU conducts an internal audit the risk-based approach is used. The Internal Audit Department provides the annual plan of the internal audit, which defines the scope of the audit as well as the list of departments subject to audit, for the approval of the NBU Board. The plan can be changed in case substantial risks were identified.

14e. Are the results of the internal audit publicly available? If Yes provide a link or Share.

- ☐ Yes
- ☒ No

14f. Please select the statement that most accurately characterizes the results of the last internal audit: (Choose one.)

- ☒ No material exceptions found.
- ☐ Minor exceptions found. (please answer 14g)
- ☐ Material exceptions found. (please answer 14g)

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

- ☒ Yes (please answer 15a)
- ☐ No (please proceed to 16)

15a. If yes, please state the name(s) of the entity(ies) who perform the financial audit.

Ernst & Young Audit Services LLC

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

06/04/2025

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

01/01/2024 to 31/12/2024

15d. How frequently does the financial audit occur? (Choose one.)

- ☐ Two or more times a year (please answer 15f)
- ☒ Annually (please answer 15f)
- ☐ Less than annually (please answer 15e)

15f. Are the results of the financial audit publicly available? If yes, provide link or share.

- ☒ Yes

Link: <https://bank.gov.ua/en/news/all/konsolidovana-finansova-zvitnist-ta-konsolidovaniy-zvit-pro-upravlinnya-za-rik-scho-zakinchivsya-31-grudnya-2024-roku>
- ☐ No

15g. Please select the statement that most accurately characterizes the results of the last financial audit: (Choose one.)

- ☒ No material exceptions found.
- ☐ Minor exceptions found. (please answer 15h)
- ☐ Material exceptions found. (please answer 15h)

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

- ☐ Yes (please answer 16a)

☒ No (please proceed to 17)

PARTICIPANTS AND PARTICIPATION

The purpose of this section is to understand issues relating to participation in the depository, including eligibility requirements, conditions of participation, and supervision of participants.

17. What types of entities are eligible to become participants and how many of each type are there currently? (Choose all that apply.)

- ☒ Banks (please answer 17a)
- ☐ Brokers (please answer 17e)
- ☐ Individuals (please answer 17i)
- ☒ Foreign Institutions (please answer 17m)
- ☒ Other entities (please answer 17q)
- ☐ Not applicable

17a. How many Bank participants are there currently? (then please answer 17b)

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17b. Please select the features included in the eligibility requirements for Banks. (Choose all that apply.)

- ☐ Financial Thresholds (please answer 17c)
- ☒ Regulatory Oversight (please answer 17c)
- ☐ Market Experience (please answer 17c)
- ☒ Other (please answer 17d)

17c. Where can a description of the specific eligibility requirements for Bank participants be found?

Licensing requirements for exercising professional activity on the capital markets (depository activity) approved by Resolution No.114 of the National Securities and Stock Market Commission as of February 10, 2022; Procedure of issuance, suspension and revocation of licenses for exercising professional activities on the capital markets approved by Resolution No.982 of the National Securities and Stock Market Commission as of October 21, 2021; Regulation on organization of activity by banks and their separate units while exercising professional activity on the stock market approved by Resolution No.1708 of the National Securities and Stock Market Commission as of December 16, 2014; Regulation on Depository and Clearing Activity, and Settlement of Securities Transactions by the National Bank of Ukraine, approved by the NBU Board Resolution No.140 as of 21.12.2017.

17d. Please explain:

Software and IT-security requirements according to Regulation on Depository and Clearing Activity, and Settlement of Securities Transactions by the National Bank of Ukraine, approved by the NBU Board Resolution No.140 as of 21.12.2017.

17f. Please select the features included in the eligibility requirements for Brokers. (Choose all that apply.)

- ☐ Financial Thresholds (please answer 17g)
- ☐ Regulatory Oversight (please answer 17g)
- ☐ Market Experience (please answer 17g)
- ☐ Other (please answer 17h)

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

1 ICSD (as of 16/10/2025)

17n. Please select the features included in the eligibility requirements for Foreign Institution participants. (Choose all that apply.)

- ☐ Financial Thresholds (please answer 17o)
- ☒ Regulatory Oversight (please answer 17o)
- ☐ Market Experience (please answer 17o)
- ☐ Other (please answer 17p)

17o. Where can a description of the specific eligibility requirements for Foreign Institution participants be found?

The Law of Ukraine 'On Depository System of Ukraine', Regulation on Depository and Clearing Activity, and Settlement of Securities Transactions by the National Bank of Ukraine, approved by the NBU Board Resolution No.140 as of 21.12.2017.

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

In addition to banks, non-bank depository institutions are eligible to become participants of the NBU CSD.

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

28 (as of 16/10/2025)

17s. Please select the features included in the eligibility requirements for the participants referred to above as "Other entities". (Choose all that apply.)

- ☐ Financial Thresholds (please answer 17t)
- ☒ Regulatory Oversight (please answer 17t)
- ☐ Market Experience (please answer 17t)
- ☒ Other (please answer 17u)

17t. Where can a description of the specific eligibility requirements for participants described above as "Other entities" be found?

Licensing requirements for exercising professional activity on the capital markets (depository activity) approved by Resolution No.114 of the National Securities and Stock Market Commission as of February 10, 2022; Procedure of issuance, suspension and revocation of licenses for exercising professional activities on the capital markets approved by Resolution No.982 of the National Securities and Stock Market Commission as of October 21, 2021.
Regulation on Depository and Clearing Activity, and Settlement of Securities Transactions by the National Bank of Ukraine, approved by the NBU Board Resolution No.140 as of 21.12.2017.

17u. If other, please explain:

Software and IT-security requirements according to Regulation on Depository and Clearing Activity, and Settlement of Securities Transactions by the National Bank of Ukraine, approved by the NBU Board Resolution No.140 as of 21.12.2017

18. Are participants required to contribute capital to the depository that would result in ownership of the depository?

- ☐ Yes (please answer 18a)
- ☒ No
- ☐ Not applicable
- ☐ Other (please answer 18b)

19. Are prospective participants subject to an initial review and approval process regarding compliance with eligibility requirements?

- ☒ Yes
- ☐ No

- ☐ Not applicable
- ☐ Other (please answer 19a)

Conditions of Participation

20. What governs the relationship between the depository and the participants? (Choose all that apply.)

- ☒ Relevant law and regulation
- ☒ Standard participation contract
- ☐ Established terms and conditions of participation
- ☒ By-laws of the depository
- ☒ Rules of the depository
- ☐ Other (please answer 20a)
- ☐ Not applicable

20b. Please provide a link to the rulebook.

https://bank.gov.ua/en/legislation/Regulation_21122017_140 Additionally, the NBU CSD participants can find guidelines as well as manuals on the technical interaction with the NBU CSD within the NBU CSD proprietary automated depository system.

Response Necessary/Eligibility Question

21. Rule 17f-7 requires that an Eligible Securities Depository “holds assets for the custodian that participates in the system on behalf of the Fund under safekeeping conditions no less favorable than the conditions that apply to other participants.”

Please confirm that assets of foreign investors held by custodians as participants in the depository are held under safekeeping conditions no less favorable than the conditions that apply to other participants.

- ☒ Yes (please answer 21b)
- ☐ No (please answer 21a)
- ☐ Not applicable (please answer 21a)
- ☐ Other (please answer 21a)

21b. Please confirm the basis for the arrangements in place to ensure that the assets you hold for custodians receive the same level of safekeeping protection as the assets held for other categories of participants. (Choose all that apply.)

- ☒ Relevant Law and Regulation (please answer 21d)
- ☐ Standard participation contract (please answer 21d)
- ☐ Established terms and conditions of participation (please answer 21d)
- ☒ By-laws of the depository (please answer 21d)
- ☐ Rules of the depository (please answer 21d)
- ☐ Other (please answer 21c)

21d. For each item in Question 21b that you checked, please briefly supply references or citations to the law(s), regulation(s), or depository rule(s), participation condition(s), or participant contract provision(s), as applicable.

The Law of Ukraine 'On Depository System of Ukraine' and Regulation on Depository and Clearing Activity, and Settlement of Securities Transactions by the National Bank of Ukraine, approved by the NBU Board Resolution No.140 as of 21.12.2017 do not stipulate any peculiarities on opening and servicing of foreign investors' accounts. All participants are treated equally and receive the same level of safekeeping protection.

22. How does the depository notify participants of material changes to the conditions of participation? (Choose all that apply.)

- ☒ By e-mail
- ☐ By telephone
- ☒ By public announcement
- ☒ By press release
- ☐ Other (please answer 22a)
- ☐ Not applicable

Governance of Participants

23. Who enforces compliance with the depository's conditions of participation? (Choose all that apply.)

- ☒ The depository
- ☐ The exchange
- ☐ The depository's regulator
- ☐ Other (please answer 23a)
- ☐ Not applicable

23a. Please explain:

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

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

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

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

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

According to the contractual arrangements, the NBU has the right to fine the customers for overdue payment for NBU CSD services.

When the martial law was imposed in Ukraine, the NBU CSD cancelled its fees for provided services for the period from March 17, 2022 to May 24, 2023. Therefore, there were no customers that have been fined throughout the mentioned period for overdue payment. Affter resumption of fees calculation by the NBU CSD in 2023, one customer systemically failed to pay for rendered services and its participation was terminated.

25b. If other, please explain:

DEPOSITORY FUNCTIONALITY AND SERVICES; USE OF AGENTS

Certain functionalities and services reduce risk to an investor if provided in an efficient manner. The purpose of this section is to identify those functionalities that may potentially be offered by depositories and clearing systems around the world, and ascertain whether they are offered by your institution.

26. For which of the following security types do you serve as a depository or clearing system? (Choose all that apply.)

- ☒ Government securities
- ☐ Equities
- ☐ Corporate bonds
- ☐ Corporate money market instruments
- ☐ Others (please answer 26a)
- ☐ Not applicable

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

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

27-1b. Please list the instrument types for which it is not compulsory by market practice to:
(i) settle in your depository

NBU CSD settles and safekeeps only government securities, all other types of securities are settled and safekept by the National Depository of Ukraine. Settlement and safekeeping of government securities by NBU CSD is compulsory by law and by market practice.

(ii) safekeep in your depository:

NBU CSD settles and safekeeps only government securities, all other types of securities are settled and safekept by the National Depository of Ukraine. Settlement and safekeeping of government securities by NBU CSD is compulsory by law and by market practice.

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

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

27-2b. Please list the instrument types for which it is not compulsory by market practice to:
(i) settle in your depository

NBU CSD settles and safekeeps only government securities, all other types of securities are settled and safekept by the National Depository of Ukraine. Settlement and safekeeping of government securities by NBU CSD is compulsory by law and by market practice.

(ii) safekeep in your depository:

NBU CSD settles and safekeeps only government securities, all other types of securities are settled and safekept by the National Depository of Ukraine. Settlement and safekeeping of government securities by NBU CSD is compulsory by law and by market practice.

28. Settlement and Safekeeping Percentages

28a. Please list by instrument type the percentage of the total market in your jurisdiction (either volume or value) settled within your depository, exclusive of your links with third parties. (e.g. 60% of all bonds in the total market is settled within your depository, whereas 40% is settled outside of your depository.)

All government securities (100%) are settled within NBU CSD.

28b. Please list by instrument type the percentage of the total market in your jurisdiction (either volume or value) safekept within your depository, exclusive of your links with third parties. (e.g. 60% of all bonds in the total market is safekept within your depository, whereas 40% is safekept outside of your depository.)

All government securities (100%) are held in safekeeping within NBU CSD.

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

- ☐ Yes (please answer 29a)
- ☒ No

29i. If other, please explain:

30. Has any participant suffered any losses in the past three years due to the depository's performance?

- ☐ Yes (please answer 30a)
- ☒ No
- ☐ Not applicable
- ☐ Other (please answer 30m)

30c. Corporate Action. Please specify total loss in USD:

30e. Settlement Process - Securities. Please specify total loss in USD:

30g. Settlement Process - Cash. Please specify total loss in USD:

30i. System Outage. Please specify total loss in USD:

30k. For Other, please specify number of instances:

30l. For Other, please specify total loss in USD:

30m. If other, please explain:

Other Services

31. Who accepts cash deposits (or makes payment credit accommodations) for depository transactions? (Choose all that apply.)

- ☐ Depository
- ☐ Central Bank
- ☐ Banks appointed by depository (please answer 31a)
- ☒ Neither/others (e.g. credit lines used please answer 31b)

☐ Not applicable

31b. If neither/others, please explain:

Securities transactions are settled on DVP/RVP/DVD or FOP basis.

DVP can be conducted in two ways depending on the institution responsible for settling the cash leg of the securities transaction – the Settlement Center (SC) or the NBU CSD.

1. When cash leg of the DVP (OTC and on-exchange) securities transactions is settled by the SC, all assets are fully prefunded before the trade execution (with the exception of repo transactions with government bonds, which are settled in 'repo with risk control' mode and 'FX swap with risk control mode', when SC holds and manages margin of the parties to the transaction). Securities are blocked in NBU CSD depository system, funds are prefunded in the cash account of the clearing institution (SC), opened with the NBU (Central Bank). An accounting with respect to these funds is provided by the clearing institution in its record-keeping system. NBU CSD and a clearing institution provide for simultaneous settlement of both legs of a securities transaction. DVP Model 1 and Model 3 are used. This model is close to settlement in central bank money as all the funds are prefunded in the account of the SC with the Central Bank.

SC holds NBU license for conducting currency transactions, which allows it to settle government bonds denominated in foreign currency in their currency of denomination. In this case, settlement is performed in commercial bank money.

2. When cash leg of the OTC DVP securities transactions is settled by the NBU CSD, settlement is also executed through blocking of securities in the seller's account until the moment of cash remittance from the buyer's banking account. Funds are transferred between the buyer's and seller's banking accounts in NBU's RTGS system. DVP Model 1 is used. This model provides for settlement in Central Bank money as the cash leg settlement is performed in NBU's RTGS system. Securities leg is settled only after NBU CSD receives confirmation on cash settlement from NBU RTGS system.

RVP settlement is executed by the NBU CSD through NBU RTGS system upon government securities placement. Funds are transferred by the banks which service parties to the securities transaction based on the information on the transaction provided by NBU CSD. This model provides for settlement in Central Bank money as the cash leg settlement is performed in NBU's RTGS system.

DVD settlement is executed by the NBU CSD through the NBU RTGS system upon government securities placement by means of a switch auction (replacement of the outstanding government bonds that are already in circulation with the newly issued government bonds). Funds are transferred by the banks which service parties to the securities transaction based on the information on the transaction provided by NBU CSD. The transfer of the cash difference in values of the newly placed and outstanding domestic government bonds (if necessary) occurs via NBU's RTGS system prior to the switch of government bonds (the newly issued government bonds are blocked in the recipient's account until the cash leg settlement is completed). This model provides for settlement in Central Bank money as the cash leg settlement is performed in NBU's RTGS system.

In April 2023, ISO 20022 was implemented for the NBU payment system (RTGS system). In this connection, a cash leg of the RVP/DVD securities transactions (upon government securities placement/replacement) as well as DVP securities transactions (in cases when NBU CSD settles a cash leg) is settled with application of ISO 20022.

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

- ☒ Depository
- ☐ Central Bank
- ☐ Banks appointed by depository (please answer 32a)
- ☒ Neither/others (please answer 32b)
- ☐ Not applicable

32b. If others, please explain:

NBU CSD processes cash clearing upon the initial placement of government bonds; NBU CSD clears obligations of the participants of placement with the coupon/redemptions obligations of the issuer.

In case of DVP securities transactions with government securities on the secondary market, the cash clearing is processed by the Settlement Centre (in cases when a cash leg of the transaction is settled by the Settlement Center) or by NBU CSD (in cases when a cash leg of the transaction is settled by NBU CSD).

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

- ☐ Depository
- ☐ Central Bank
- ☐ Banks appointed by depository (please answer 33a)
- ☒ Neither/others (Please answer 33b)
- ☐ Not applicable

33b. If others, please explain:

The Settlement Center manages the movement of cash for cash deposits (in cases when a cash leg of the DVP securities transaction is settled by the Settlement Center). NBU payment system manages cash transfers for RVP/DVD transactions through RTGS upon initial placement/replacement of government securities (no cash deposits in this case). NBU payment system also manages cash transfers for DVP transactions in cases when a cash leg of the DVP securities transaction is settled by the NBU CSD.

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

- ☒ Depository
- ☐ Central Bank
- ☐ Banks appointed by depository. (please answer 34a)
- ☒ Neither/others (please answer 34b)
- ☐ Not applicable

34b. If others, please explain:

NBU CSD manages the movement of cash for cash clearing for transactions through the payment system of the National Bank of Ukraine (upon initial placement of government securities); the Settlement Center manages the movement of cash for cash clearing for DVP securities transactions (in cases when a cash leg of the DVP securities transaction is settled by the Settlement Center).

35. Please indicate services you provide. (Choose all that apply.)

- ☐ Information in advance on corporate (annual or special) meetings in order that owners can vote.
- ☐ Tax assistance where foreign holders may be entitled to tax relief at source or through a claim.
- ☐ In order to avoid fails, an automatic securities lending facility - if requested - is provided for. (please answer 35a)
- ☐
- Collateral handling in support of activities including securities lending, overdraft coverage, cash management, repurchase agreements, etc. Please provide details. (please answer 35c)
- ☒ Same day turnaround settlements.
- ☒ Information on distribution of new issues (IPO, Privatization).
- ☒ Other (please answer 35d)
- ☐ Not applicable

35d. If other services, please explain:

Cash clearing for issuer's operations

36. What procedures are in place for the processing of corporate action entitlements? (Choose all that apply.)

- ☐ Credited to the securities account on the day indicated below regardless of whether actually collected by the depository on the scheduled date. (please answer 36a)
- ☒ Credited to the securities account upon actual receipt by the depository.
- ☐ Corporate action entitlements are handled by an entity separate from the depository. (please answer 36c)
- ☐ Not applicable
- ☐ Other (please answer 36d)

37. What procedures are in place for the processing of interest and dividends?(Choose all that apply.)

- ☐ Credited to the cash account on the day indicated below regardless of whether actually collected by the depository on the scheduled date. (please answer 37a)
- ☒ Credited to the cash account upon actual receipt by the depository.
- ☐ Income and dividend collection is handled by an entity separate from the depository. (please answer 37c)
- ☐ Not applicable
- ☐ Other (please answer 37d)

Linkages With Other Central Securities Depositories (CSD) or International Central Securities Depositories (ICSD)

38. Please list all depositories or settlement systems to which you have an electronic link (note: this excludes institutions where you only hold accounts without further system linkage).

Clearstream Banking S.A.

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

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

40. Has a business interruption recovery plan been developed in the event the linkages should become inoperable for any reason?

- ☐ Yes
- ☐ No (please answer 40a)
- ☐ Other (please answer 40a)
- ☒ Not applicable

ACCOUNT STRUCTURES AND RECORDKEEPING

The purpose of this section is to identify the nature of accounts; the naming convention is employed, the level of segregation achieved, accessibility in the event of bankruptcy and the frequency of reporting generated from them.

41. Are participants permitted to maintain more than one account at the depository?

- ☒ Yes (please answer 41a)
- ☐ No
- ☐ Not applicable
- ☐ Other (please answer 41d)

41a. If yes, please indicate number: (Choose one.)

- ☒ An unlimited number of accounts.
- ☐ More than one account (please answer 41b and indicate how many)
- ☐ Other (e.g. subaccounts) (please answer 41c)

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

- ☒ Yes (please answer 42a)
- ☐ No
- ☐ Not applicable
- ☐ Other (please answer 42d)

42a. If yes, is segregation required or simply permitted?

- ☒ Required (please answer 42b)
- ☐ Permitted (please answer 42b)
- ☐ Other (please answer 42e)

42b. How does segregation occur? (Choose all that apply.)

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

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

- ☒ Yes
- ☐ No

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

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

44. In the event a participant's single or main account is blocked for any reason (e.g., insolvency, penalties, violations, liens), would securities held in any account or accounts on behalf of the participant's clients be accessible:

44a. By the participant's clients?

- ☒ Yes (please answer 44b)
- ☐ No
- ☐ Other (please answer 44c)

44b. If yes, please describe briefly how clients of participants would access their securities and whether there would be any delay in their ability to do so:

Securities held in any account or accounts on behalf of the participant's clients will be accessible for their transfer to the client's account opened with another participant. The possible delays might take place during the process of transferring clients' assets to another custodian.

In case of insolvency when a failing custodian does not have a successor, assets are accessible for clients after databases transfer to the Authorized Safekeeping Agency (National Depository of Ukraine). Such participant's client should open an account with another custodian, and the latter should give an instruction to the Authorized Safekeeping Agency to transfer the securities to the client's account.

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

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

44e. If yes, please describe briefly under what conditions access would be granted to the intervening authorities:

DGF has access to participant's client account in order to perform insolvency proceedings. Other authorities can have access to participant's client account due to respective court decision or in other cases in compliance with the applicable laws of Ukraine. NSSMC has powers to appoint administrator for insolvent participant to provide for due insolvency proceedings, such administrator operates the participant's account.

44g. By the participant's creditors?

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

44j. By the depository's creditors?

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

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

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

45b. In which format is the source data maintained?

ORACLE 12c Database

Response Necessary/Eligibility Question

46. Rule 17f-7 requires that an Eligible Securities Depository “provides periodic reports to its participants with respect to its safekeeping of assets, including notices of transfers to or from any participant's account.”

Does the depository make available periodic safekeeping reports to participants, including notices of transfers to or from the participant's account?

- ☒ Yes (please answer 46b)
- ☐ No (please answer 46a and then proceed to 48)
- ☐ Other (please answer 46a)

46b. If yes, please indicate the scheduled frequency.

- ☐ Real time
- ☐ Quarterly
- ☐ Daily
- ☐ Annually
- ☐ Weekly
- ☐ Upon request
- ☐ Monthly
- ☒ Other (please answer 46c)

46c. If other, please explain:

Reports are generated by participants independently in the NBU CSD automated depository system. Participants can generate the respective report at any time after execution of a securities transaction. The reports can be provided by the NBU CSD in hard copy upon the participant's request.

47. What is your document and record retention policy for documents and records described above in this section? (Choose one.)

- ☐ 6 months or less
- ☐ 7 years
- ☐ 1 year
- ☐ 10 Years
- ☐ 3 years
- ☐ Other (please answer 47a)
- ☒ 5 years

SETTLEMENTS

The purpose of this section is to identify the model of settlement employed, the relationship between cash and securities, and the basis on which participants meet their obligations.

48. The Committee on Payment and Settlement Systems of the Bank for International Settlements (BIS) has identified three

common structural approaches or models for linking delivery and payment in a securities settlement system. Please indicate which model your procedures most closely resemble (Please refer to details on the models within the "Help" section located below this question): (Choose all that apply.)

- ☒ Model 1 - Gross, Simultaneous Settlements of Securities and Funds Transfers. (please answer 48a)
- ☐ Not applicable
- ☐ Model 2 - Gross Settlements of Securities Transfers Followed by Net Settlement of Funds Transfers. (please answer 48a)
- ☐ Other (please answer 48b)
- ☒ Model 3 - Simultaneous Net Settlement of Securities and Funds Transfers. (please answer 48a)

48a. Please briefly describe your settlement process, including how your settlement procedures may vary from the model chosen above (and as described below in the Help section)?

The Settlement Center performs settlement of on-exchange and OTC securities transactions based on DVP Model 1 and Model 3. DVP Model 1 settlement is performed by the NBU CSD on the OTC market and upon government securities replacement via a switch auction, when outstanding government bonds are replaced with the newly issued government bonds, and there is a cash difference in values of the outstanding and replacing government bonds (primary market, settlement is performed on the DVD basis). On the primary market NBU CSD performs gross securities settlements and net cash payments (settlement is performed on the RVP basis).

Question 48 Help:

Model 1 - Gross, Simultaneous Settlements of Securities and Funds Transfers. These systems settle transfer instructions for both securities and funds simultaneously on a trade-by-trade (gross) basis, with final (irrevocable and unconditional) transfer of securities from the seller to the buyer (delivery) occurring at the same time as final transfer of funds from the buyer to the seller (payment). The securities settlement system maintains securities accounts and funds accounts for participants. Transfer of securities and cash are made by bookentry.

Model 2 - Gross Settlements of Securities Transfers Followed by Net Settlement of Funds Transfers. These systems settle securities transfer instructions on a trade-for-trade (gross) basis, with final transfer of securities from the seller to the buyer (delivery) occurring throughout the processing cycle, but settle funds transfer instruction on a net basis, with final transfer of funds from the buyer to the seller (payment) occurring at the end of the processing cycle.

The securities settlement system maintains securities accounts for participants, but funds accounts are usually held by another entity (often a commercial bank or the central bank). Securities are transferred by book-entry, such transfer being final at the instant the entries are made on the securities settlement system's books. The corresponding funds transfers are irrevocable, but not final. During the processing cycle, the system calculates running balances of funds debits and credits, the balance being settled at the end of the processing cycle when the net debit and net credit positions are posted on the books of the commercial bank or central bank that maintains the funds accounts. Settlement of funds accounts may occur once a day or several times a day.

Model 3 - Simultaneous Net Settlement of Securities and Funds Transfers. These systems settle transfer instructions for both securities and funds on a net basis, with final transfer of both occurring at the end of the processing cycle. Settlement may occur once a day or several times a day. The securities settlement system maintains securities accounts for participants. Funds accounts may be maintained by another entity, either a commercial bank or the central bank. During a processing cycle, running balances of debits and credits to funds and securities accounts are calculated. All funds and securities transfers are provisional until the end of the processing cycle, at which time book-entry transfer of securities take place. If and only if all participants have sufficient balances of funds and securities, final transfers of the net securities balances and net funds balances are executed.

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

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

49c. If other, please explain:

On the primary market (upon auctions of domestic government bonds denominated in foreign currency) cash and securities movements are not simultaneous as foreign currency is transferred by participants by means of cross-border payments via corresponding banking.

OWNERSHIP OF SECURITIES

The purpose of this section is to determine how ownership of securities is represented, the ways the depository maintains ownership or control of securities held in the depository, and the extent to which ownership of assets held by the depository is separated from the proprietary assets of the depository.

50. How are depository eligible securities held by the depository?

- ☒ Securities in the depository are held in dematerialized form.
- ☐ Securities in the depository are held in certificated form.
- ☐ Other (please answer 50a)

51. If depository eligible securities are certificated, can depository eligible securities be held outside of the depository?

- ☐ All eligible securities must be held in the depository. (please answer 51b)
- ☐ Securities may move freely into and out of the depository. (please answer 51h)
- ☐ Once entered into the depository, eligible securities must remain in the depository. (please answer 51b)
- ☐ Certain designated securities may be held outside the depository. (please answer 51a)
- ☒ Not applicable
- ☐ Other (please answer 51k)

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

- ☐ Yes (please answer 52a)
- ☒ No (please answer 52a)
- ☐ Not applicable
- ☐ Other (please answer 52j)

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

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

52d. If the securities held by the depository are recorded by book entry at the registrar, are the securities registered only to the depository, with the depository providing the function of recording ownership on a centralized basis for the market? (Choose all that apply.)

- ☐ Yes (please answer 52e)
- ☐ No (please answer 52g)
- ☒ Other (please answer 52l)

52i. If the securities held with the depository are recorded by book-entry at the registrar, what are the control features at the registrar for transfer of registrar positions to and from the depository (e.g., authentication procedures, reconciliation, confirmation of position at registrar)? Please describe:

Not applicable

52l. If other, please explain:

Not applicable

Response Necessary/Eligibility Question

53. Rule 17f-7 requires that an Eligible Securities Depository “maintains records that identify the assets of each participant and segregate the system's own assets from the assets of participants.”

Does the depository maintain records that identify the assets of each participant and segregate the system's own assets from the assets of participants?

- ☒ Yes
- ☐ No
- ☐ Not applicable (please answer 53a)
- ☐ Other (please answer 53a)

54. Does the law protect participant assets from claims and liabilities of the depository?

- ☒ Yes
- ☐ No
- ☐ Not applicable
- ☐ Other (please answer 54a)

55. Can the depository assess a lien on participant accounts? (A lien would entitle the depository to take and hold or sell the securities of the participant in payment of a debt.) (Choose all that apply.)

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

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

Not applicable. No liens are applied by the NBU CSD.

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

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

55e. If a lien is placed on a participant's account which has been designated for its clients, will the depository select certain securities to be subject to the lien?

- ☐ Yes (please answer 55f)
- ☐ No (please answer 55h)
- ☒ Other (please answer 55n)

55g. Please explain:

Liens on participants accounts can also be imposed based on an authorized state agency desicion.

55i. If other, please describe:

55j. For accounts designated as client accounts, do procedures exist to restrict the placement of liens only to obligations arising from safe custody and administration of those accounts?

- ☐ Yes (please answer 55k)
- ☐ No
- ☒ Other (please answer 55m)

55l. Please explain:

55m. If other, please explain:

Liens can be imposed on a certain client’s account upon respective court decision.

55n. If other, please explain:

Not applicable. Liens on participants accounts are only imposed based on a court or authorized state agency desicion.

56. Transfer of Legal Ownership
Does the depository have legal authority to transfer title to securities?

- ☐ Yes (please answer 56a)
- ☒ No
- ☐ Not applicable
- ☐ Other (please answer 56e)

56e. If other, please explain:

Legal authority to transfer title to securities pertains to depository institutions (participants of NBU CSD) or depository institutions' clients, which opened nominee accounts.

HANDLING OF SECURITIES OUTSIDE THE DEPOSITORY ENVIRONMENT
The purpose of this section is to consider the process (and any risk inherent within such a process) that involves the safekeeping of client assets while they are being removed from a depository and being lodged into a depository.

57. How are eligible securities lodged (that is, placed) in the depository system? (Choose all that apply.)

- ☒ A registered certificate in the name of the depository is delivered to the depository.

- ☒ A participant delivers the security with a valid transfer deed or stock power or other transfer document to the depository which then effects registration.
- ☐ A registrar re-registers the security in the name of the depository.
- ☒ Other (please answer 57a)
- ☐ Not applicable

57a. Please describe:

Government bonds are lodged in the depository system as a result of an auction. A participant (that is a government bonds primary dealer) enters into the agreement on the government bonds purchase, afterwards securities are placed on the participant's account.

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

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

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

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

60. During the process of lodging securities into the depository, can the securities: Be traded?

- ☒ Yes
- ☐ No (please answer 60c)
- ☐ Not applicable
- ☐ Other (please answer 60c)

60a. During the process of lodging securities into the depository, can the securities: Be settled?

- ☒ Yes
- ☐ No (please answer 60d)
- ☐ Not applicable
- ☐ Other (please answer 60d)

60b. During the process of lodging securities into the depository, can the securities: Have ownership transferred?

- ☐ Yes
- ☒ No (please answer 60e)
- ☐ Not applicable
- ☐ Other (please answer 60e)

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

Government bonds can be circulated after settlement of government bonds (resulting from the auction) is finalized.

61. Are securities immediately available for delivery upon transfer to the depository?

- ☐ Yes

- ☐ No (please answer 61a)
- ☒ Not applicable
- ☐ Other (please answer 61d)

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

Not applicable

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

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

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

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

**65. While the securities are being removed from the depository, can they:
65a. Be traded? (Choose one)**

- ☐ No (please answer 65b)
- ☒ Not applicable
- ☐ Yes
- ☐ Other (please answer 65b)

65c. Be settled?

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

65e. Have ownership transferred?

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

STANDARD OF CARE

The purpose of this section is to understand the responsibility and liability that the depository has in providing services to its participants/members in the settlement and clearing of securities and/or cash, and to understand what type of protections exist for participants in the event of a participant failure/default.

Depository Liability

66. Does the depository accept liability (independent of any insurance coverage) for the following:

66a. Reconciliation errors with the registrar and/or the issuer that result in direct damages or losses to participants?

- ☐ No
- ☐ Not applicable
- ☒ Yes (please answer 66b)
- ☐ Other (please answer 66d)

66b. If yes, please check all of the following that apply:

- ☐ Financial limits are imposed on the amount of liability assumed by the depository
- ☒ The depository assumes liability for direct losses
- ☐ The depository assumes liability for indirect or consequential losses
- ☐ Other (please answer 66c)

66e. Theft of securities (either physical certificate or electronically from accounts at the depository) from the depository that result in direct damages or losses to participants?

- ☐ No
- ☒ Yes (please answer 66f)
- ☐ Not applicable
- ☐ Other (please answer 66h)

66f. If yes, please check all of the following that apply:

- ☐ Financial limits are imposed on the amount of liability assumed by the depository
- ☒ The depository assumes liability for direct losses
- ☐ The depository assumes liability for indirect or consequential losses
- ☐ Other (please answer 66g)

66i. Failure of the depository's systems that result in direct damages or losses to participants because they cannot use either securities or funds?

- ☐ No
- ☒ Yes (please answer 66j)
- ☐ Not applicable
- ☐ Other (please answer 66l)

66j. If yes, please check all of the following that apply:

- ☐ Financial limits are imposed on the amount of liability assumed by the depository
- ☒ The depository assumes liability for direct losses
- ☐ The depository assumes liability for indirect or consequential losses
- ☐ Other (please answer 66k)

66m. Any direct damages or losses to participants caused by the depository due to its errors, omissions or fraud?

- ☐ No
- ☒ Yes (please answer 66n)
- ☐ Not applicable

☐ Other (please answer 66p)

66n. If yes, please check all of the following that apply:

- ☐ Financial limits are imposed on the amount of liability assumed by the depository
- ☒ The depository assumes liability for direct losses
- ☐ The depository assumes liability for indirect or consequential losses
- ☐ Other (please answer 66o)

66q. Any direct damages or losses to participants caused by the depository in its capacity as a central counterparty?

- ☐ No
- ☒ Not applicable
- ☐ Yes (please answer 66r)
- ☐ Other (please answer 66t)

66u. Does the depository guaranty settlement?

- ☐ No
- ☒ Yes (please answer 66v)
- ☐ Not applicable
- ☐ Other (please answer 66w)

66v. Please explain how this is accomplished. What are the procedures and safeguards that permit the depository to guaranty settlement?

The NBU CSD guarantees settlement of both cash and securities legs in cases when a cash leg of a DVP/RVP/DVD securities transaction is executed through the NBU's payment system (RTGS). In cases when cash leg settlement of the DVP securities transactions is guaranteed by the Settlement Centre the NBU CSD guarantees settlement of a securities leg only.

The NBU CSD provides for RVP OTC settlement on the primary market upon the government securities placement. In this case, the NBU CSD clears obligations of the participants of placement with the coupon/redemptions obligations of the issuer. Once primary dealers’ applications for government securities placement have been approved by the issuer, the NBU CSD transfers securities to the primary dealers’ securities accounts and unconditionally blocks securities. The NBU CSD then sends by means of NBU RTGS a payment information to the bank that services the primary dealer with the information on the securities deal. The bank transfers the funds outstanding and sends the respective information back to the NBU CSD by means of NBU RTGS. Once the NBU CSD has received information on the funds transfer, it unblocks securities on the primary dealer’s account. If the primary dealer has failed to pay, the securities are transferred back to the issuer's account. The RVP settlement cycle is executed on the T+1 basis.

The NBU CSD provides for DVD OTC settlement on the primary market upon government securities replacement, which takes place via a switch auction (replacement of the outstanding government bonds with the newly issued government bonds). In this case, the depository institution (primary dealer) that is participant of a switch auction blocks the outstanding securities to be redeemed as a result of the auction on its account with the NBU CSD. Once primary dealers’ applications for government securities replacement have been approved by the issuer, NBU CSD transfers newly issued securities in exchange of the outstanding securities to the primary dealers’ securities accounts and unconditionally blocks these securities. The NBU CSD then sends by means of NBU RTGS payment information to the bank that services the primary dealer with the amount on cash difference in values of the newly placed and outstanding domestic government bonds (if any). To have the newly issued securities unblocked, primary dealers via its servicing banks have to pay the cash difference. The banks transfer the indicated amount and send the respective information back to the NBU CSD by means of NBU RTGS. Once the NBU CSD has received information on the funds transfer, it unblocks the newly issued securities on the primary dealer’s account and debits the blocked outstanding securities from the primary dealer's securities account to the issuer's securities account for further redemption and cancellation. If the primary dealer has failed to pay the cash difference, the newly issued securities are transferred back to the issuer's account. The DVD settlement cycle is executed on the T+5 basis.

The NBU CSD also provides for DVP OTC settlement on the secondary market. In this case, once counterparties' instructions are matched, the NBU CSD blocks securities on a securities account of the depository institution which services the seller. The NBU CSD then sends a payment information by means of NBU RTGS to the bank that services the buyer with the information on the transaction. The buyer's bank transfers the funds outstanding and sends the respective information back to the NBU CSD by means of NBU RTGS. Simultaneously with receipt of information that the funds have been debited from the account of the buyer, the NBU CSD transfers securities from a securities account of the depository institution, which services the seller to the securities account of the depository institution, which services the buyer. If the buyer has failed to pay, the securities are unconditionally unblocked on the account of the depository institution, which services the seller at the end of the operational day. The DVP settlement cycle is executed intraday.

66x. Any direct damages or losses to participants caused by the depository as a result of force majeure events, acts of God, or political events, etc.?

- ☒ No
- ☐ Yes (please answer 66y)
- ☐ Not applicable
- ☐ Other (please answer 66-1)

66-2. In all cases where the depository assumes responsibility for direct or indirect or consequential losses, is the depository's liability limited by a standard of care determination?

- ☐ No
- ☐ Yes (please answer 66*)
- ☒ Not applicable
- ☐ Other (please answer 66!)

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

67a. Indemnification

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

67d. Insurance

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

67g. Acknowledgement of liability for losses caused by depository's own actions.

- ☒ Yes (please answer 67h)
- ☐ No
- ☐ Other (please answer 67h)
- ☐ Not applicable

67h. Please explain (then please answer 67i):

The agreement between the NBU CSD and its participants stipulates that the NBU CSD bears liability for the failure to take actions, for untimely or negligent actions that resulted in direct loss of a participant. NBU CSD assumes responsibility only for the direct loss that is proven by the respective documents.

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

The information is provided in the Unified agreement on bank servicing and provision of other services by the National Bank of Ukraine.

67j. Other

- ☐ Yes (please answer 67k)
- ☒ No

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

- ☐ Yes

- ☒ No
- ☐ Other (please answer 68a)

Security Control

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

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

Entity Name	Ukraine National Bank of Ukraine
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70. Do participants have access to affect their holdings, including confirming and affirming trades, movement of securities on their accounts, etc.?

- ☒ Yes (please answer 70a)
- ☐ No
- ☐ Other (please answer 70d)
- ☐ Not applicable

70a. How is access given to participants? (Choose all that apply.)

- ☒ By direct electronic link (please answer 70b)
- ☒ Other (please answer 70c)

70b. Please select type of electronic link:

- ☐ Dial-up modem
- ☐ Secured, leased, dedicated telephone line
- ☒ Internet
- ☐ Fax

70c. Please explain:

Receipt/delivery of statements, instructions etc in hard copy

71. Regarding data security:

71a. Are passwords used by participants to access their accounts?

- ☐ Yes
- ☐ No
- ☐ Not applicable
- ☒ Other (please answer 71b)

71b. If other, please explain:

To access accounts with the NBU CSD participants use their private SSL keys of the National Bank of Ukraine's Accredited Certification Authority.

71c. Does each user have a unique user ID?

- ☒ Yes
- ☐ No
- ☐ Not applicable
- ☐ Other (please answer 71d)

71e. Are passwords regularly changed?

- ☐ Yes (please answer 71f)
- ☐ No
- ☐ Not applicable
- ☒ Other (please answer 71g)

71g. If other, please explain:

To access accounts with the NBU CSD participants use their private SSL keys of the National Bank of Ukraine’s Accredited Certification Authority. The SSL keys are changed once a year.

71h. Is there a user lock-out after a pre-set number of unsuccessful User ID attempts?

- ☐ Yes (please answer 71i)
- ☐ No
- ☐ Not applicable
- ☒ Other (please answer 71j)

71j. If other, please explain:

To access accounts with the NBU CSD participants use their private SSL keys of the National Bank of Ukraine’s Accredited Certification Authority. Input of user passwords to access the storage of/token with the private SSL key as well as user lock-outs is defined and regulated by the participant's internal information security policy.

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

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

72a. Please explain:

The NBU CSD communicates with the NBU’s payment system (RTGS system) and a clearing institution by means of the software developed by the NBU CSD.

73. How does the depository communicate with other market entities?

73a. Stock Exchanges (Choose all that apply.)

- ☐ Dial-up modem
- ☐ Secured, leased, dedicated telephone line
- ☐ Internet
- ☐ Fax
- ☐ Paper/other
- ☒ Not applicable

73b. Payment Systems (Choose all that apply.)

- ☐ Dial-up modem
- ☐ Secured, leased, dedicated telephone line
- ☒ Internet
- ☐ Fax
- ☒ Paper/other
- ☐ Not applicable

73c. Clearing Houses (Choose all that apply.)

- ☐ Dial-up modem
- ☐ Secured, leased, dedicated telephone line

- ☒ Internet
- ☐ Fax
- ☐ Paper/other
- ☐ Not applicable

73d. Registrars (Choose all that apply.)

- ☐ Dial-up modem
- ☐ Secured, leased, dedicated telephone line
- ☐ Internet
- ☐ Fax
- ☐ Paper/other
- ☒ Not applicable

74. How is access to the physical building controlled? (Choose all that apply.)

- ☒ By guards
- ☒ By electronic keys/personal ID card
- ☒ By alarm system
- ☐ Other (please answer 74a)

75. What are the vault security procedures for the safekeeping of physical paper? (Choose all that apply.)

- ☐ Not applicable no vault is maintained
- ☒ Electronic keys/combinations
- ☒ Dual access control
- ☒ Visitor logs
- ☐ Vault counts (please answer 75a)
- ☒ Intrusion alarms
- ☒ Fire alarms
- ☒ Guards
- ☐ Other (please answer 75b)

Participant Default Protections Resulting from a Participant Failure

76. If a participant defaults, how and by whom is the loss covered? (Choose all that apply?)

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

76d. Please explain:

Assets under custody of the insolvent participant are transferred to the successor or an Authorized Safekeeping Agency. Losses resulting from the insolvency are covered due to the bankruptcy proceedings and in keeping with regulations of the National Securities and Stock Market Commission.

In cases when the Settlement Center is responsible for the cash leg settlement, failure of the participant to deliver securities for the DVP settled transactions is prevented by the mechanism of full prefunding of assets (cash and securities) before the trade execution. The exception is a part of repo transactions with government bonds, which are settled in "repo with risk control" mode and service 'FX swap with risk control'. In these cases, SC collects and manages margin of the parties to transaction. If one of the party defaults, SC transfers compensation in the amount of prefunded margin in prefunded type of asset (e.g. national or foreign currency, government bonds etc.) to the non-defaulting party without taking any obligation on its part. In any case, SC does not take any risk of non-fulfilment of obligations by the parties to transactions.

In cases when the NBU CSD is responsible for the cash leg settlement, DVP settlement is only performed OTC on the gross basis, T+0, therefore in case of the buyer's failure to pay for securities, the securities are unblocked on the seller's account.

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

- ☐ Yes (please answer 77a)
- ☒ No
- ☐ Not applicable
- ☐ Other (please answer 77a)

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

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

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

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

78h. Who is covered by the fund? (Choose all that apply.)

- ☐ Direct depository participants only
- ☐ The beneficial owner also
- ☐ Other (please answer 78i)

78j. When is the guaranty fund used? (Choose all that apply.)

- ☐ When a broker defaults
- ☐ When a direct participant defaults
- ☐ Other (please answer 78k)

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

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

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

Risk management and risk mitigation mechanisms that are applied upon securities transactions settlement are stipulated by the Regulation on Depository and Clearing Activity, and Settlement of Securities Transactions by the National Bank of Ukraine, approved by the NBU Board Resolution No. 140 as of 21.12.2017
https://bank.gov.ua/en/legislation/Regulation_21122017_140

URL Link: https://bank.gov.ua/en/legislation/Regulation_21122017_140

79d. What type or types of settlement controls (Choose all that apply.)

☒ Blocking or freezing of securities positions (please answer 79e)

☒ Controlling DVP settlement (please answer 79f)

☒ Simultaneous DVP (please answer 79g)

☐ Other (please answer 79h)

79e. Please explain:

In cases when the Settlement Center is responsible for the cash leg settlement of DVP securities transactions, to execute a DVP securities transaction, a buyer/seller shall make a 100% prefunding by blocking securities and/or cash prior to the transaction.

In cases when the NBU CSD is responsible for the cash leg settlement of DVP securities transactions, the NBU CSD blocks securities on the securities account of the participant that services the seller.

79f. Please explain:

To execute a DVP securities transaction, a buyer/seller shall fully prefund securities and/or cash prior to the transaction.

The NBU CSD controls sufficiency of securities on the participant's securities account. In cases when the NBU CSD is responsible for the cash leg settlement of the DVP securities transactions, NBU CSD also controls transfer of funds by the buyer through the NBU's payment system (RTGS system).

79g. Please explain:

Securities are moved/released immediately after receipt of the information on cash transfers from the Settlement Center or the NBU's payment system.

80. Does the stock exchange have default protections that extend to the depository, such as the following? (Choose all that apply.)

☐ Margin requirements for stock exchange members

☐ Guaranty fund for stock exchange members

☐ Financial requirements for stock exchange membership

☒ Other (please answer 80a)

☐ No

☐ Not applicable

80a. Please explain:

Most on-exchange securities transactions are settled on a DVP basis. Before executing the trade a stock exchange member is obliged to make 100% blocking of securities and/or funds required for the trade in the Settlement Centre.

BUSINESS RECOVERY PLAN

This section is intended to identify key aspects of the depository's Business Recovery Plan (BRP), including testing requirements and past results, expected recovery time periods, and the independent review and validation (if any) of the BRP.

81. Do you have a formal business recovery plan?

☒ Yes (please answer 81a)

☐ No

☐ Other (please 81g)

81a. Does your Business Recovery Plan include: (Choose all that apply.)

☒ Back-up of all computer files ☒ Off-site operations facility ☒ Digital/electronic signing of documentation

☒ Off-site data storage ☒ Remote working ability ☐ Other (please answer 81h)

☒ Back-up files stored and locked

81b-1. Please identify the frequency of testing for the following third party:
- Depository participants/members

Testing with participants is performed by the NBU CSD at the moment of opening an account for the participant and the first customer installation. NBU CSD also performs testing of RVP/DVP settlement cycles with banks which service a cash leg of the transaction and send the respective information on payment to the RTGS system. The NBU CSD performs the following testing with participants and the Settlement Center ad hoc when the depository or payment system is upgraded.

81b-2. Please identify the last date of testing for the following third party:
- Depository participants/members

September 25, 2025 (within the framework of BCP testing)

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

Not applicable

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

N/A

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

Not applicable

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

N/A

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

Not applicable

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

N/A

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

The NBU CSD performs testing for the Settlement Centre ad hoc when the NBU CSD's or Settlement Centre's system is upgraded.

81f-2. Please identify the last date of testing for the following third party:
- Any other third party

September 25, 2025 (within the framework of BCP testing)

82. How quickly can the main system be reactivated in the event of an outage? (Choose one.)

- ☒ 1 - 4 hours
- ☐ Longer than 24 hours
- ☐ 4 - 8 hours
- ☐ Not applicable
- ☐ 8 - 24 hours
- ☐ Other (please answer 82a)

83. If a back-up system exists, how quickly can the back-up system be activated in the event of the main system failing? (Choose one.)

- ☒ 1 - 4 hours
- ☐ Longer than 24 hours
- ☐ 4 - 8 hours
- ☐ Not applicable
- ☐ 8 - 24 hours
- ☐ Other (please answer 83a)

84. Will the depository publicly announce any system interruption?

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

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

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

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

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

84f. Please explain:

Via NBU CSD's Depository System

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

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

PERFORMANCE, INSURANCE, AND LOSS

This section is intended to identify the level of insurance maintained by the depository, and the extent to which coverage would extend to financial loss incurred by participants and their clients, including but not limited to losses resulting from operating performance, security breaches, and

employee negligence or misconduct.

86. Has there been any material loss by the depository during the past three years?

- ☐ Yes (please answer 86a)
- ☒ No
- ☐ Other (please answer 86b)
- ☐ Not applicable

87. Has the depository been subject to any litigation involving a participant during the past three years?

- ☐ Yes (please answer 87a)
- ☒ No
- ☐ Other (please answer 87b)
- ☐ Not applicable

88. Has the depository realized revenues sufficient to cover expenses during the past three years? (Choose one.)

- ☐ Yes for all three years
- ☐ Yes for two of the last three years
- ☐ Yes for one of the last three years
- ☐ None of the last three years
- ☐ Not applicable
- ☒ Other (please answer 88a)

88a. If other, please explain:

Yes for all three years. However, after the russia's launch of the full-scale invasion of Ukraine NBU CSD temporarily suspended accrual of its fees for provided services to domestic participants for the period from March 17, 2022 to May 24, 2023. Therefore, NBU CSD's revenues were significantly lower for the mentioned period. Moreover, all operations within the NBU CSD books with government securities issued by the Ministry of Finance of Ukraine to support the Defense Forces of Ukraine during the russian-Ukrainian war (with the so-called War Bonds) have always been and continue to be serviced by NBU CSD free of charge.

89. Does the depository maintain a reserve for operating losses?

- ☐ Yes (please answer 89a)
- ☐ No
- ☐ Not applicable
- ☒ Other (please answer 89b)

89b. If other, please explain:

The NBU CSD is a department of the Central Bank and does not maintain a separate balance sheet.

90. Has the regulatory body with oversight responsibility for the depository issued public notice that the depository is not in current compliance with any capital, solvency, insurance or similar financial strength requirements imposed by such regulatory body?

- ☐ Yes (please answer 90a)
- ☐ No
- ☒ Not applicable
- ☐ Other (please answer 90f)

90b. In the case of such a notice having been issued, has such notice been withdrawn, or, has the remedy of such noncompliance been publicly announced by the depository?

- ☐ Yes (please answer 90c)
- ☐ No (please answer 90d)
- ☐ Other (please answer 90e)

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

- ☒ No insurance
- ☐ Insurance to cover losses in the event of Default on settlement commitments by the depository or a participant (please answer 91a)
- ☐ Fidelity insurance (that is, insurance to cover loss of securities or money resulting, for example, from acts such as forgery, theft, fraud and/or employee dishonesty) (please answer 91b)
- ☐ Insurance for Operational Errors and Error & Omissions (please answer 91c)
- ☐ Insurance for the Premises (please answer 91d)
- ☐ Other type of insurance (please answer 91e)

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

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

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

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

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

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

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

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

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

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

97. Who is the insurance carrier? If more than one insurance carrier, please list each carrier here and provide your responses to questions 97a and 97b in corresponding order.

Not applicable

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

Not applicable

97b. What is the term of the policy?

Not applicable

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

- ☐ Depository
- ☐ Direct depository participants

- ☐ Final investors
- ☐ Other (please answer 97d)
- ☒ Not applicable

98. If you feel that you would like to provide additional details on any of the given answers, feel free to provide any additional comments here (maximum of 5,000 characters) or prepare an additional document identifying the question(s) you are commenting on and upload the document under 98a:

98a. Upload document here:

PUBLIC AVAILABILITY

99. The AGC encourages respondents/depositories to make their answers to this questionnaire publicly available. Will you be making your response publicly available? (Please "hover"over the below multi-select responses for additional guidance.)

- ☒ Yes (please answer 99a)
- ☐ No

99a. If yes, how will you be making it publicly available: (Choose all that apply.)

- ☒ Web site (please answer 99b)
- ☐ By individual request with depository (please answer 99c)
- ☐ Other (please answer 99i)

99b. Please provide web site address of publicly available questionnaire:

https://bank.gov.ua/files/Depository/AGC_NBU_Questionnaire.pdf

99d. How would they prefer to be contacted? (Choose all that apply.)

- ☐ Telephone (please answer 99e)
- ☐ Facsimile (please answer 99f)
- ☐ By mail/air courier (please answer 99g)
- ☐ By e-mail (please answer 99h)

100. Association members from time to time receive requests from their direct investor-clients for an informational copy of a depository's completed questionnaire. Such requests typically lead to interactions between personnel at the depository in question and member personnel or client personnel, or both. Those interactions take time and impose costs on both members and depositories.
Do you approve of Association members delivering a copy of your completed questionnaire to the member's direct client in response to the client's request?

- ☒ Yes
- ☐ No

101. Does your organization have a documented cybersecurity policy in place? If so, please provide a copy or overview.

- ☒ Yes
- ☐ No

Comments:

One of the NBU’s functions according to the Law of Ukraine ‘On the National Bank of Ukraine’ is determining the procedure, requirements, and measures of cyber security and information security in Ukraine’s financial markets, which activities are regulated and supervised by NBU, as well as for parties subject to funds transfers, exercising control over their implementation; establishing the Cyber Security Centre of the National Bank of Ukraine, ensuring operation of the cyber security system in Ukraine's financial markets. There is an IT security policy in NBU and a number of issue related polices (incident management, IT resources access, cryptographic protection, remote access to the NBU's information resources, authentication within NBU's information resources, network security, vulnerabilities management etc). The internal team conducts regular vulnerability management that envisages periodical scanning of all IT resources aimed at discovering vulnerabilities, weak configurations, and provision of recommendations to eliminate thereof. Regular external audit is conducted, which poses a stringent requirement to technical support team to have the respective ethical hackers certificates (EC-Council, Offensive Security etc). There are the Computer Security Incident Response Team in NBU (CSIRT-NBU) and Security Operation Center (SOC), which provide continuous search and analysis of cyberthreats (vulnerability management, exploits testing, investigations of malicious code examples, attacks analysis, drafting of recommendations, etc).

Strategic cybersecurity measures are included into the National Bank of Ukraine’s Strategy and envisage implementation of a number of initiatives aimed at reaching the goals ‘Implementation of Legislative and Regulatory Requirements to Strengthen Control Over Cyber Resilience, Information Security, Digital Operational Resilience of the Financial Sector’s Critical Infrastructure with Consideration of EU Legislation on Digital Operational Resilience for the Financial Sector (DORA)’, ‘Development of the NBU's Cyber Security Center’ and ‘Provision for the Cyber Resilience of the National Bank of Ukraine’. The Information Security Policy has been effective in the National Bank of Ukraine since 2016. This year, a new version of the information security policy was adopted. The issue of cybersecurity for banks, including the procedure for exchanging information on cyber threats is envisaged in the Regulation on Organizing Cybersecurity in the Banking System of Ukraine. This Regulation, in particular, stipulates functioning of the National Bank of Ukraine’s dedicated website, which was set-up as an open source MISP software (a solution for banks to access the system for collecting, processing, storage and sharing of information related to technical and organizational measures in the real-time mode and with consideration of confidentiality requirements). Ethical hacking as an instrument to assess the National Bank of Ukraine’s information resources security and detection of its potential vulnerabilities is used on a yearly basis by means of performing a technical audit and penetration testing.

The initial certification audit of the NBU's information security management system (ISMS) for compliance with the ISO 27001 standard is currently underway.

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

- ☒ Yes
- ☐ No

Comments:

NBU IT- security specialists take regular skill improvement trainings related to cybersecurity including ethical hacking.

All NBU employees undergo periodic training on information security and pass relevant tests. The tests results are used to adjust and plan further trainings.

Additionally, technical experts from the NBU regularly take part in interdepartmental and international cyber training, such as "Hackwave," "National Cybersecurity Preparedness: Grid NetWars" to enhance their knowledge and skills in detecting and responding to cyberattacks. These training sessions also focus on evaluating preparedness for potential cyber threats.

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

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

Comments:

The policy of business continuity management of the National Bank defines approaches to the business continuity management to ensure performance of functions influenced by the negative factors. The main tool for business continuity planning is the analysis of the impact of negative factors on the activities and continuous operation of units. RTO, RPO are defined for all critical information systems. The General Plan for Ensuring Continuity of Activities, plans for restoration of information resources and procedures for support of engineering systems that ensure continuity of critical processes, reserve places for key employees, etc. have been prepared and tested. Depending on the scenario of negative factors, the National Bank takes measures to respond to the existent negative factors (implementation of actions according to the General Plan, plans for recovery of information resources, etc).

Other topics that are covered by NBU’s business continuity policy: IT resources access, cryptographic protection, remote access to the NBU's information resources, authentication within NBU's information resources, network security, vulnerabilities management.

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

- ☒ Yes
- ☐ No

Comments:

In 2025, a new information security policy was adopted:

1) the legal framework for the functioning of the ISMS was comprehensively regulated in accordance with the ISO/IEC 27001:2022 standard;

2) the goals and principles of information security in the NBU were clarified;

3) the general structure of the ISMS and the principles of its construction, the roles and responsibilities of the NBU structural units in the field of information security, the powers of the owners of information resources were determined;

4) the scope of the ISMS (units, processes, information systems, geographical locations) and exclusions from the scope of the ISMS were established.

New policies have been developed for network security; information security in the NBU's relations with ICT service providers. New versions of the policy for protection against malicious code, authentication within NBU's information resources have been developed. Changes have been made to the information security risk management policy.

105. Please advise how often you review the policy.

- ☐ Semi-Annually
- ☒ Annually
- ☐ Other

Comments:

In order to keep the Policy updated, it is reviewed on a regular basis, usually once a year.

106. Please provide (as an attachment) a diagram showing where your cybersecurity function resides and who it reports to.

Comments:

The coordinator of information security in the National Bank of Ukraine is the Governor.

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

- ☒ Enterprise Risk Management Framework
- ☒ Risk and Control Assessments
- ☐ External Reviews
- ☒ Other (Please add comments)

Comments:

A scenario assessment of operational risks, as well as information security risks (and cyber risks, which are components of information security risks) is conducted.

108. Do you conduct ongoing testing and monitoring processes to ensure that all internal and external connectivity and system configurations are not at risk of cybersecurity breaches? If yes, please provide details and indicate frequency.

- ☒ Yes
- ☐ No

Comments / frequency:

Regular monitoring of information resources that play a crucial role in the National Bank of Ukraine's critical processes is conducted in alignment with the specific threats and risks associated with their execution. Scans of information systems for vulnerabilities are carried out constantly.

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

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

Comments:

The National Bank of Ukraine adheres to technological control standards defined by ISO 27001, NIST 800, and recommendations from CIS, OWASP, and ISSAF. To ensure compliance with the information security policy, the National Bank of Ukraine operates information protection systems of the National Bank of Ukraine: information security accident analysis systems; endpoint protection and antivirus protection systems; data leakage prevention systems; attack detection and prevention systems; attack detection and warning systems for wireless networks; content filtering system when providing access to the Internet; systems of control of privileged users actions; email protection systems; web application protection systems.

110. Does your organization use multi-factor authentication?

- ☒ Yes
- ☐ No

Comments:

The National Bank uses multi-factor authentication in keeping with the Regulation on authentication within NBU's information resources.

111. Where your organization has outsourced activities or functions to a third-party provider, is your cyber risk exposure documented?

- ☐ Yes
- ☐ No
- ☒ Not applicable as no outsourcing

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

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

112a. Other There is a Computer Security Incident Response Team in NBU (CSIRT-NBU), which provides continuous search and analysis of cyberthreats (vulnerability management, exploits testing, investigations of malicious code examples, attacks analysis, drafting of recommendations, etc.). The National Bank of Ukraine has entered into memoranda with other national and international cyber defense centers for the exchange of information on cyber threats to facilitate early detection of cyberattacks. Also, the Security Operation Center was established in 2025 in NBU.

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

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

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

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

114a. Other

The information will be made available through official communication channels (in particular, publications on the official website).

115. In the last 12 months has your organization been subject to a cyber attack that impacted the service you provide to us? If yes, please provide details.

☒ Yes

☐ No

Comments:

Ukraine as a whole and the NBU in particular have been under cyber attacks since February 24, 2022. Herewith, NBU services have not been ipmacted as a result of cyber attacks, and all services have been provided in a usual mode.

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

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

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

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

117. For cloud technology and associated cybersecurity risks, please confirm:

(i) that you have procedures and controls in place to protect our information from mishandling or theft;

(ii) how these procedures and controls tie back to your record retention policy

☐ Yes

☐ No

☒ Not applicable as cloud not used

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

☒ Yes

☐ No

Comments:

119. Is your organization aware of SWIFT’s Customer Security Program (CSP)?

- ☒ Yes
- ☐ No

Comments:

120. Does your organization ensure compliance with SWIFT’s CSP controls?

- ☒ Yes

Comments:

You have reached the end of the questionnaire. Please be sure your contact details are updated. Your contact information is located in the first section of Part One of the questionnaire.