

The Association of Global Custodians - Questionnaire

Finland- Euroclear Finland Ltd

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Welcome to the Depository- Information Gathering Project. Before beginning, we suggest that you: print the entire document for review on paper; 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.

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.

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."

In particular, 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

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)

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:

Equities, bonds, money market instruments.

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

Private Company

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

Other (please answer 4a)

4a. If other, please explain:

Euroclear Finland is a for profit organization. However, the fees Euroclear Finland charges as a book-entry register have to be reasonable and equal with regard to all account operators and issuers, Section 10a(4) of the Act on the Book-Entry System.

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

Euroclear Finland is a wholly owned subsidiary of Euroclear Sweden, which is wholly owned by NCS Holding company. The holding company was acquired by Euroclear SA as of 31 October, 2008.

6. Please answer the following:

6a. What is the date of establishment of the depository?

31/Dec/1995

6b. What is the date that the depository's operations began?

01/Jan/1997

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

Act on Book-entry System (No 826/1991 as amended), Act on Book-entry Accounts (no 827/1991 as amended), Securities Market Act (Chapter 4a, No 321/1998), Netting Act (no1084/1999) and Euroclear Finland's Rules on home page www.euroclear.eu

7a. Is the regulation or statute electronically available?

Yes (please answer 7b)

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

www.finlex.fi/en

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?

Knowledge on securities market, not in bankruptcy, not convicted on securities market crimes.

7e. What are the election procedures?

They are elected by Euroclear Finland's AGM.

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

No limitations.

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

Finnish Financial Supervisory Authority (FIN-FSA), Ministry of Finance.

7h. What is the extent of their voting powers?

Each member has one vote.

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.

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

Financial Supervisory Authority of Finland (FIN-FSA). In accordance with the Act on Bank Of Finland the central bank has a general duty to attend for its part to the reliability and efficiency of the payment system and financial system. Bank of Finland has thus a role in the general oversight of Euroclear Finland. Additionally, the Ministry of Finance has the power to grant and withdraw Euroclear Finland's licence to operate as a central securities depository in accordance with the section 12 of the Act on the Book-entry System and, respectively, Euroclear Finland's licence to operate as the clearing organisation in accordance with Chapter 4a, Sections 2 and 3 of the Securities Markets Act. Furthermore, the Ministry of Finance ratifies Euroclear Finland's Rules and amendments thereto.

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?

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):

Ministry of Finance

11a.

Restrictions on depository activities., Termination of depository activities.

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

Financial Supervisory Authority

11c.

Fines, Suspension of depository activities., Other (please answer 11d)

11d. Please explain:

Pursuant to the Act on Financial Supervisory Authority (No 878/2008), the authority may issue a public objection for breach of regulations by a supervised entity unless the case warrants more severe sanctions. If such misconduct is repeated or continuous, the authority may issue a public warning as a stricter measure.

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

No

Capital

13. Are annual financial statements publicly disclosed?

Yes (please answer 13a)

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

Yes (please answer 13b)

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:

www.euroclear.eu

Internal Audit

14. Is an internal audit undertaken in your depository?

Yes (please answer 14a)

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

Financials and operations, Group Internal Audit

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

Two or more times a year (please answer 14d)

14d. Are the results of the internal audit publicly available?

No (please answer 14e)

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

No material exceptions found.

14g. Please list the date of your last internal audit performed by internal auditors and the period that the audit covered:

Euroclear Finland does not disclose this information.

15. Is a financial audit performed by an external party? If yes, which type of entity? (Choose all that apply.)

Yes - Audit firm (please answer 15a)

15a. If yes, please state name(s) of organization(s) who undertake the financial audit.

PricewaterhouseCoopers

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

Two or more times a year (please answer 15e)

15e. Are the results of the financial audit publicly available?

No (please answer 15g)

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

No material exceptions found.

15j. Please list the date of your last financial audit performed by independent external auditors and the period that the audit covered:

Euroclear Finland does not disclose this information.

16. Is an operational audit performed by an external party? If yes, which type of entity? (Choose all that apply.)

Yes - Audit firm (please answer 16a), Yes - Regulatory authority (please answer 16a)

16a. If yes, please state name(s) of organization(s) who undertake the operational audit.

Ernst & Young, Financial Supervisory Authority

16b. How frequently does the operational audit occur? (Choose one.)

Two or more times a year (please answer 16d)

16d. Are the results of the operational audit publicly available?

No (please answer 16e)

16e. Please select the statement that most accurately characterizes the results of the last operational audit: (Choose one.)

No material exceptions found.

16i. Please list the date of your last operational audit performed by independent accountants and the period that the audit covered:

Euroclear Finland does not disclose this information.

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)

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

17

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)

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

Euroclear Finland Rules, Act on Book-entry System, Chapter 4a of the Securities Market Act

17e. How many Broker participants are there currently? (then please answer 17f)

0 (as direct participants)

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)

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

Euroclear Finland Rules, Act on Book-entry System, Chapter 4a of the Securities Market Act

17i. How many Individual participants are there currently? (then please answer 17j)

approximately 70000

17j. Please select the features included in the eligibility requirements for Individual participants. (Choose all that apply.)

Other (please answer 17l)

17l. If other, please explain:

Euroclear Finland has the obligation to open a book-entry account to anyone who undertakes to comply with the account agreement and pay the fees and perform the other liabilities relating to the book-entry account.

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

8

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)

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

Act on the Book-entry System, Euroclear Finland Rules

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

State Treasury, Bank of Finland, a stock exchange, a derivatives exchange

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

8

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

Other (please answer 17u)

17u. If other, please explain:

The access of these other institutions is regulated in Section 7 of the Act on Book-entry System and in Chapter 4a, Section 8 of the Securities Markets Act. State of Finland, Bank of Finland, a stock exchange and a derivatives exchange can act as account operators and as clearing parties without any specific further eligibility requirements.

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

No

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

Yes

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, Rules of the depository

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

21b. Please briefly describe the approaches you take and the arrangements you have in place to ensure that the assets you hold for custodians receive the same level of safekeeping protection as the assets held for other categories of participants.

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

By e-mail, By public announcement, Other (please answer 22a)

22a. Please explain:

The Rules and amendments thereto are published on Euroclear Finland's website www.euroclear.eu.

Governance of Participants

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

The depository, The depository's regulator, Other (please answer 23a)

23a. Please explain:

Euroclear Finland's Disciplinary Board in accordance with Euroclear Finland's Rules.

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

Fines, Suspension of participation, Termination of participation, Other (please answer 24a)

24a. Please explain:

The Disciplinary Board may issue Reprimands, Cautions and impose Disciplinary Fees.

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

Other (please answer 25b)

25b. If other, please explain:

Disciplinary Board has issued reprimands to market participants in certain cases. The Disciplinary Board has also ordered at least in one case the payment of the disciplinary fee.

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)

26a. Please name the other security types:

Depository receipts

27. Is the use of the depository in your market compulsory by law or compulsory by market practice for the settlement or safekeeping of all instrument types in your market (e.g. equities, government securities, corporate bonds, money market instruments, warrants, derivatives etc). (Choose all that apply.)

Yes by law for settlement, but not for all instrument types (please answer 27a), Yes by law for safekeeping, but not for all instrument types (please answer 27b)

27a. Please list the instrument types for which it is not compulsory by law to:

(i) settle in your depository

Bonds and money market instruments, funds, cooperatives, guarantee shares

(ii) safekeep in your depository:

Bonds and money market instruments, funds, cooperatives

27b. Please list the instrument types for which it is not compulsory by market practice to:

(i) settle in your depository

N/A

(ii) safekeep in your depository:

N/A

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 institution, exclusive of your links with third parties.

100 % of listed equities Money market instruments and bonds: not available

28b. Please list by instrument type the percentage of the total market in your jurisdiction (either volume or value) held in safekeeping within your institution.

100 % of listed equities Money market instruments and bonds: not available

29. Are there any activities performed by a third party on behalf of the depository for the depository participants (e.g., vaulting of physical securities, registration, entitlement processing, etc.)?

No

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

No

Other Services

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

Depository, Central Bank

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

Depository, Central Bank

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

Depository, Central Bank

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

Depository, Central Bank

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., 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)

35c. Collateral Handling: please provide details:

Euroclear Finland's debt market system (RM system) includes a facility for automatic collateral handling. A special purpose book-entry account is used as a collateral management account. The collateral value of the account is monitored with the help of the RM system on the basis of an agreement concluded between the pledgee and Euroclear Finland. The opening and pledging of the account shall be agreed on between the account holder and the pledgee. Within the framework of the pledge agreement, the account holder shall have the right, without the specific consent of the pledgee, to use and transfer the book-entries and money in the account if the measure does not result in non-compliance with the collateral requirement of the account. The service is used by the Bank of Finland and the EMCF as CCP.

35d. If other services, please explain:

Euroclear Finland acts as the sole registrar/transfer agent in Finland. Annual general meeting services, shareholder information and insider register services.

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)

36a. Credited to the securities account: (Choose all that apply.)

On pay date.

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)

37a. Credited to the cash account: (Choose all that apply.)

On pay date.

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.

Euroclear France, Clearstream Frankfurt, Euroclear Sweden, Eesti Väärpaperikeskus (Estonian CSD)

39. Are procedures and controls (firewalls) in place to avoid systemic collapse or contamination if one of the linked entities should experience business interruptions for whatever reason?

Yes (please answer 39a)

39a. Please explain:

Euroclear Finland does not disclose this information.

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

Yes

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)

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

An unlimited number of accounts.

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

Yes (please answer 42a)

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

Required (please answer 42b)

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

By separately designated participant accounts., By separately designated beneficial owner accounts.

43. Does the depository permit its participants to open accounts in the participant's own nominee name(s)?

No

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

44a. By the participant's clients?

Yes (please answer 44b)

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:

The fact that an account is a custodial nominee account must be expressly stated in the account (account type). This statement creates a legal presumption for the benefit of the owners behind the account holder. In accordance with the section 5a(1) of the Act on Book-entry Accounts the securities held in a custodial nominee account do not belong to the account holder or to its successors or creditors. The account holder is not able to have a pledge registered for his own benefit in an account held in his own name.

Thus the custodian can not enforce a lien to the securities in a custodial nominee account (at least not in Finland). In case of a bankruptcy or insolvency of a foreign custodian, the book-entries would not be delivered directly to the bankruptcy estate of the account holder to satisfy the claims of the custodian's creditors. Instead Euroclear Finland would act in accordance with the foreign law and the instructions of the receiver to safeguard the rights of the investors. Thus the investors must be considered to have proprietary rights in respect of the securities instead of a mere contractual claims against the custodian.

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

No

44g. By the participant's creditors?

No

44j. By the depository's creditors?

No

45. In what form does the depository maintain records identifying the assets of each participant? (Choose all that apply. Please refer to "Help" for clarification.)

Computer file (please answer 45b), Hard copy (please answer 45b), Computer tape (please answer 45b)

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

Computer file

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)

46b. If yes, please indicate the scheduled frequency: (Choose one.)

Daily

47. What is your document retention policy for documents described in previous question? (Choose one.)

Other (please answer 47a)

47a. If other, please explain:

At least 10 years.

SETTLEMENTS

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)

48a. How do your settlement procedures vary from the model chosen above?

-

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 book-entry.

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?

Yes

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.

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

Not applicable

52. If securities are dematerialized:

May dematerialized security positions be re-certificated and held outside the depository?

No (please answer 52a)

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

Through book-entry at the depository

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.)

No (please answer 52g)

52g. If the securities held with the depository are recorded by book-entry at the registrar but are not registered exclusively to the depository, may they be registered to:

Other (please answer 52h)

52h. Please describe:

Euroclear Finland acts as the sole registrar in Finland. Changes in ownership update simultaneously lists of owners and debtors.

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:

N/A

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

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

Yes

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.)

Yes (please answer 55a)

55a. If yes, for what reasons are liens or similar claims imposed? (Choose all that apply.)

To secure payment for purchased securities

55c. Please indicate the limits of this lien as indicated below: (Choose one.)

The lien may extend to settled client positions. (please answer 55d)

55d. Please explain:

In accordance with the Securities Market Act the clearing house (Euroclear Finland) has a statutory lien on securities deposited in a commission account if Euroclear Finland has taken the responsibility of the settlement or paid the delivery. However, in HEXClear Euroclear Finland does not take responsibility of the settlement and does not pay the delivery.

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?

No (please answer 55h)

55h. If no, please indicate whether the entire account will be subject to the lien.

Yes

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)

55k. If yes, are the restrictions accomplished by:

Other procedures (please answer 55l)

55l. Please explain:

Book-entry account agreement

56. Transfer of Legal Ownership

Does the depository have legal authority to transfer title to securities?

Yes (please answer 56a)

56a. When does title or entitlement to depository securities pass between participants? (Choose one.)

When the transaction is processed on an intra-day basis. (please answer 56c)

56c. Where does title or entitlement to depository securities pass between participants? (Choose one.)

On the depository books

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 in the depository system? (Choose all that apply.)

Not applicable

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

Other (please answer 58a)

58a. Please explain:

Not applicable, Euroclear Finland handles only dematerialised securities. The securities cannot be withdrawn from the depository after dematerialisation.

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

Not applicable

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

Be traded?

Not applicable

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

Be settled?

Not applicable

60b. During the process of lodging securities into the depository, can the securities:

Have ownership transferred?

Not applicable

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

Not applicable

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.

63. How are eligible securities removed from the depository? (Choose one.)

Not applicable.

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

Not applicable

65. While the securities are being removed from the depository, can they:

65a. Be traded? (Choose one)

Not applicable

65c. Be settled?

Not applicable

65e. Have ownership transferred?

Not applicable

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?

Yes (please answer 66b)

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

Other (please answer 66c)

66c. If other, please explain:

Euroclear Finland maintains a Registration Fund that is used in the case an account operator cannot compensate all damages incurred by an account holder. Euroclear Finland is not itself liable for the damages.

66e. Theft of securities (either physical certificate or electronically from accounts at the depository) from the depository?

Yes (please answer 66f)

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

The depository assumes liability for direct losses

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

Yes (please answer 66j)

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

The depository assumes liability for direct losses

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

Yes (please answer 66n)

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

The depository assumes liability for direct losses

66q. The depository acting as the central counterparty?

Not applicable

66u. Does the depository guaranty settlement?

No

66x. Force majeure events, acts of God, or political events, etc.?

No

66+. 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?

Yes (please answer 66*)

66*. Please define the standard of care applied:

Euroclear assumes liability of direct damages only when its caused by wilful or negligent breach of Euroclear Finland's Rules and decisions issued by the Managing Director.

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

No

67d. Insurance

No

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

Yes (please answer 67h)

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

Euroclear Finland shall be liable for direct damage which its personnel has wilfully or by negligence caused to an account operator or clearing party by breaching the Rules, Regulations or Decisions issued thereunder. With regard to operations forming the object of the agreement, Euroclear Finland shall be liable only for direct damage to an account operator or a clearing party caused wilfully or through negligence by Euroclear Finland or its employee as well as wilfully or through negligence by a third party engaged in the provision of services relating to the operations forming the object of the agreement on the basis of an agreement concluded with Euroclear Finland or a person employed by it. Euroclear Finland shall not be liable for loss of interest, lost profits, damage arisen from other contractual relations or for other indirect damage to an account operator or a clearing party. Euroclear Finland shall not be liable for damage caused by the operation of payment systems maintained by the Bank of Finland or by other banks.

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

Euroclear Finland's Rules 1.6.4

67j. Other

No

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

No

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

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)

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

By direct electronic link (please answer 70b)

70b. Please select type of electronic link:

Secured, leased, dedicated telephone line, Internet, Fax

71. Regarding data security:

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

Yes

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

Yes

71e. Are passwords regularly changed?

Yes (please answer 71f)

71f. How often?

Monthly

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

Yes (please answer 71i)

71i. How many?

3

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)

72a. Please explain:

SWIFT

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

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

Secured, leased, dedicated telephone line, Internet, Fax

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

Secured, leased, dedicated telephone line

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

Secured, leased, dedicated telephone line

73d. Registrars (Choose all that apply.)

Not applicable

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

By electronic keys/personal ID card, By alarm system

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

Not applicable; no vault is maintained

Participant Default Protections Resulting from a Participant Failure

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

The depository guaranty fund covers the loss

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

No

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

Yes (please answer 78a)

78a. If yes, please respond to the following questions:

What is the size of the fund (then please answer 78b)?

EUR 20 million

78b. How is the size of the fund determined? (Choose one.)

Other (please answer 78c)

78c. If other, please explain:

The minimum size of the fund is regulated in Section 18 of the Act on the Book-Entry System. In principle, the size of the fund shall be determined by asset value and participant volume. Nevertheless, the minimum size of the fund is always EUR 20 million.

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

Other (please answer 78g)

78g. If other, please explain:

The fund consists of collateral payments provided by the participants (account operators) and the fund receives some funding from retained earnings.

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

Direct depository participants only, The beneficial owner also

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

When a direct participant defaults

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

Participant eligibility requirements, Participant volumes, Participant financial strength, Settlement controls that minimize or eliminate the risk of default by a participant (please answer 79d), Blocking of securities movement before receipt of payment, Blocking payment until securities are moved

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

Simultaneous DVP (please answer 79g)

79g. Please explain:

Euroclear Finland's both settlement systems, RM and HEXClear, operate RTGS, continuous and real-time DVP systems. Both systems fulfil the Lamfalussy-Recommendations using BIS – DVP model 1. A transaction is cleared and settled on the settlement date as soon as the seller has the book-entries subject to the transaction in his book-entry account available for settlement and when the payment needed in settlement has been deposited in the respective cash memorandum account by the buyer. Settlement occurs with finality by registering the transfer with a debit from the seller's book-entry securities account and a credit to the buyer's account and by entering a transfer between the respective cash memorandum accounts in an incessant and simultaneous process.

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

Financial requirements for stock exchange membership

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)

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

Back-up of all computer files, Off-site data storage, Back-up files stored and locked, Off-site operations facility

81b. Please identify both the frequency and the last date of testing for the following third party:

Depository participants/members

The changing over from primary systems to back-up facilities is tested at least once a year either with or without participants.

81c. Please identify both the frequency and the last date of testing for the following third party:

Stock exchange

81d. Please identify both the frequency and the last date of testing for the following third party:

Central bank

This information will not be disclosed.

81e. Please identify both the frequency and the last date of testing for the following third party:

Local brokers

The changing over from primary systems to back-up facilities is tested at least once a year either with or without participants.

81f. Please identify both the frequency and the last date of testing for the following third party:

Any other third party

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

1 - 4 hours

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

84. Will the depository publicly announce any system interruption?

Yes (please answer 84a)

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

To the depository regulators, To all direct participants, In the press (please answer 84c)

84b. If so, please list webpage address:

84c. If so, please list all publications:

In case of very serious and large scale interruptions, the most important financial publications might be informed.

84d. Please explain:

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

By e-mail, By telephone

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

No

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?

No

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

No

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

Yes for all three years

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

No

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?

No

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?

91. Does the depository have insurance for Default?

Yes (please answer 91a)

91a. What is the amount of the coverage?

EUR 40 million

91b. What is the amount of the deductible?

EUR 1 million

92. Does the depository have insurance for Fidelity?

Yes (please answer 92a)

92a. What is the amount of the coverage?

EUR 40 million

92b. What is the amount of the deductible?

EUR 1 million

93. Does the depository have insurance for Operational Errors?

Yes (please answer 93a)

93a. What is the amount of the coverage?

EUR 40 million

93b. What is the amount of the deductible?

EUR 1 million

94. Does the depository have insurance for Errors and Omissions?

Yes (please answer 94a)

94a. What is the amount of the coverage?

EUR 40 million

94b. What is the amount of the deductible?

EUR 1 million

95. Does the depository have insurance for Computer Fraud?

Yes (please answer 95a)

95a. What is the amount of the coverage?

EUR 40 million

95b. What is the amount of the deductible?

EUR 1 million

96. Does the depository have insurance for the Premises?

No

97. Does the depository have any other insurance?

No

98. Who is the insurance carrier? If more than one insurance carrier, please list each carrier here and provide your responses to questions 98a and 98b in corresponding order.

The insurance has been acquired from the market based on quotes. The details of the insurers will not be disclosed here.

98a. Who is the insurance carrier's parent company, if applicable? (If inapplicable, simply type n/a.)

98b. What is the term of the policy?

98c. Who does the insurance cover? (Choose all that apply.)

99. 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 99a:

The responses provided here and especially in respect of Euroclear Finland's liability regime provide only a general description of certain matters relating to Euroclear Finland and its operating environment and should not be relied upon as a complete disclosure of such matters. Comments in respect of specific questions: 17s State of Finland and Bank of Finland can act as account operators by law. They do not have any specific requirements for participation. Handling of securities outside the depository environment: Euroclear Finland handles only dematerialised securities. 78 Euroclear Finland's registration Fund is EUR 20 million.

99a. Upload document here:

PUBLIC AVAILABILITY

100. The AGC encourages respondents/depositories to make their answers to this questionnaire publicly available. Will you be making your response publicly available? (For additional guidance, please review the help feature to this

question.)

Yes (please answer 100a)

100a. If yes, how will you be making it publicly available: (Choose all that apply.)

Other (please answer 100i)

100b. Please provide web site address of publicly available questionnaire:

100i. If other, please describe how you will be making the questionnaire publicly available:

Our website www.euroclear.eu

100j. Please be sure your contact details are updated. Your contact information is located in the first section of Part One within this questionnaire.

You have reached the end of the questionnaire. Please be sure to print your responses and review them prior to changing Datasheet Progress to "Completed" under Part Two. (To print, select the printer friendly link at the top of the questionnaire.) When you are prepared to submit your answers, please return to Part One and Part Two of the questionnaire and change Datasheet Progress to "Completed". The members of The Association of Global Custodians thank you for your time and for your helpful response.

Please provide any comments you have regarding the questionnaire.