

THE ASSOCIATION OF GLOBAL CUSTODIANS

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**ASSOCIATION OF GLOBAL CUSTODIANS COMPLETES THE 22<sup>nd</sup> ANNUAL  
DEPOSITORY INFORMATION-GATHERING PROJECT**

June 14, 2022

On January 31, 2022, the Association of Global Custodians (“Association”) completed its 22<sup>nd</sup> annual Depository Information-Gathering Project (“DIGP”) with the publication of “2021-2022 Depository Information-Gathering Project: A Report for Clients and Participating Depositories.” As in previous years, the Association has made an electronic copy of this report available to the industry media and other interested persons on its web site: [www.theagc.com](http://www.theagc.com).

The AGC again conducted its DIGP questionnaire process in parallel with the World Forum of CSDs (WFC) Single Disclosure online tool. The online tool contains all of the AGC DIGP questions as well as questions pertaining to the CPMI-IOSCO Principles for Financial Market Infrastructures disclosure framework. The AGC encouraged CSDs to make use of the WFC tool as an alternative method to address the AGC DIGP questions. The responses to the AGC questions submitted via the WFC tool were transmitted to the AGC, thus the completion of both DIGP questionnaire and questions on the WFC online tool was not required.

Since its inception in 2000, the Project has grown steadily in the number of depositories and jurisdictions included in the Project. In the first year of operation, for example, the questionnaire was sent to 131 depositories in 81 jurisdictions, while this past year, it was sent to 165 depositories in over 100 jurisdictions.

Deborah Mercer-Miller, Chair of the Association of Global Custodians and Director at Citibank, N.A. notes, “The Association is pleased to report that this year’s DIGP represents the 22<sup>nd</sup> consecutive year of DIGP reporting and approximately a 25% increase in the number of depositories and jurisdictions covered since the inception of the Project in 2001.” Ms. Mercer-Miller adds that, “This centralized Project continues to enable Association members to maintain strong working relationships with representatives of depositories and depository associations. These interactions supplement the work of individual member banks’ due diligence teams, enabling coordination with key professionals across the securities depository community.”

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“DIGP serves the Association’s members by systematically gathering current and valuable information from securities depositories regarding risk and operational issues and housing the information in one central location; it also provides a platform for those securities depositories to communicate essential up-to-date information to the Association’s member banks. These capabilities enable members to deliver up-to-date risk analysis to their investor clients” says Michael Perkins, Vice President, State Street Global Process Delivery at State Street Bank and Trust Company, and Chair of the 2021-2022 DIGP Committee.

The Association launched the DIGP in an effort to assist Association members in meeting regulatory compliance requirements under Investment Company Act Rule 17f-7. This Rule details how U.S. mutual funds may hold securities through foreign depositories and requires the ongoing monitoring of depositories. In addition, the Rule requires funds to receive an analysis of the custody risks associated with maintaining assets with a foreign depository. The member banks of the Association gather a common set of depository information that is ultimately pooled in the Project’s central database and/or the WFC Tool, believing that this joint approach produces a high response rate from depositories and reduces the number of different information requests depositories receive from individual members. The members of the Association are: BNP Paribas, BNY Mellon, Brown Brothers Harriman, Citibank, N.A., Deutsche Bank, HSBC Securities Services, JPMorgan Chase Bank, N.A., Northern Trust, RBC Investor & Treasury Services, Skandinaviska Enskilda Banken, Standard Chartered Bank and State Street Bank and Trust Company.

In devising the DIGP, the Association evaluated and clarified the types of information members need to enable each bank individually to prepare the risk analyses required by Rule 17f-7. This needed information, which is obtained through the project questionnaire, falls into 9 broad areas of inquiry:

- Scope, structure, ownership, capital, regulation, and audit oversight.
- Participant identification and eligibility criteria.
- Functionality and services, including the use of agents.
- Account structures and recordkeeping.
- Settlement processes.
- Ownership of securities held in the depository.
- Standard of care, loss prevention, and asset recovery methods.
- Business recovery mechanisms.

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- Cross-depository linkages.

Project questionnaires are distributed electronically to the universe of depositories through a secure extranet site designed by Baker McKenzie IT and WFC professionals and administered and coordinated through the firm and the WFC. Baker McKenzie serves as counsel and secretariat to the Association.

Details regarding the Association members, as well as the objectives and results of DIGP can be found in the report or online at [www.theagc.com](http://www.theagc.com). For more information, please contact the Association's counsel, John J. Conroy, Jr. at 312/861-8171; fax 312/698-2107; e-mail: [John.Conroy@bakermckenzie.com](mailto:John.Conroy@bakermckenzie.com) or Juan C. Gonzalez at 312/861-7976; fax 312/698-2337; e-mail: [Juan.Gonzalez@bakermckenzie.com](mailto:Juan.Gonzalez@bakermckenzie.com).

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